

**maryott, kyle**

---

**From:** [REDACTED]  
**Sent:** 25 June 2018 08:31  
**To:** futuremedway  
**Subject:** Policy T4 comments

**Categories:** Blue Category

Dear sir

With regards to question T7 concerning Policy T4

There should be an option for the closure of Rochester airport entirely this would free up a significant portion of land which could be used for redevelopment. There is a need for an additional 29,500 (possibly 37,000) homes in the area and the land freed up could, in part, be used to accommodate some of these additional homes as well as the proposed Rochester Airport Technology Park or for additional medical facilities to help relive the pressure on existing services.

M. Langston

[REDACTED]

**maryott, kyle**

---

**From:** [REDACTED]  
**Sent:** 25 June 2018 08:40  
**To:** futuremedway  
**Subject:** Consultation response

**Categories:** Blue Category

Good morning,

My response to the far too many new properties being built in the little place of Hoo, will probably fall on deaf ears but hear goes.

I have recently had a baby and now I worry for the already lack of Doctors appointments.

I worry for places in the local schools and how many children will be crammed into one class.

I worry for the amount of new properties will have to be social housing and the potential of trouble it will bring to the area.

I worry for the amount of extra heavy traffic through Hoo.

My response to the greedy people agreeing to all these new estates, is to LISTEN to the community and put in a Doctors surgery and build a new school. I can only assume nothing gets approved where you live and don't have to fight.

Our green land is disappearing and it's awful to see.

Thank you for reading, although like I said I'm sure it will fall in deaf ears but least I can feel like I contributed.

Regards  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 25 June 2018 08:47  
**To:** futuremedway  
**Subject:** Allhallows local plan

**Categories:** Blue Category

I am writing to you to explain my reasons for being against development in the village of Allhallows in the local plan.

1. There is insufficient doctors facilities in the area with a part time surgery currently. This already struggles to get a gp in on the sessions it is open and regularly has to have last minute closures. As someone that works in a surgery I know it's not building the facilities that are the problem but getting qualified staff.
2. Public transport is constantly being reduced and we only have on average one bus an hour. This then contributes to more cars on the roads.
3. The main road currently into the village already struggles with the amount of traffic in the summer that is increased due to the popularity of Haven holiday park. Both the roads were actually blocked in the winter for 3 days due to snowdrifts. It is very common to have vehicles in ditches on the road due to poor road conditions. This would only get worse with more cars. It is also a very popular bike route which causes cars to overtake on the wrong side of a windy road, again if the traffic increases this will result in a number of accidents.
4. The plan will not only reduce an amazing view for a number of residents but will double the size of the village. The village has a lovely community feel and this will be greatly reduced by it increasing in size.
5. The volume of traffic by the developers will also be a major impact on the lanes into the village.

Thank you for taking the time to read my views.

Regards

Louisa Harris  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 25 June 2018 09:00  
**To:** futuremedway  
**Subject:** Medway Council Local Plan consultation  
  
**Categories:** Blue Category

To whom it may concern,

As a Hoo resident we are emailing to state our opposition to Medway Council's local plan.

Whilst we appreciate that there is a need for more housing to meet the growing population in Medway, we are concerned about the number of new houses that are being proposed. At present the village does not have the infrastructure to support this expansion in homes. The village has two GP surgeries and both of these are already full. We only have one primary and secondary school. There are insufficient amenities, such as shops and leisure facilities, to serve an increased population. We commute to work everyday and the traffic is already very heavy at the Wainscott bypass due to this being the only main road in and out of the village. The village would simply not be able to cope with the increased traffic and there is no train station.

We moved to Hoo a year ago as we wanted to live somewhere more rural. We were both tired of living in a busy town where there was too much traffic, insufficient parking, high crime rates and everything else that goes with overcrowding people in busy towns. When we came to Hoo we immediately fell in love with how quiet it is and the beautiful views of the fields from our home. My partner is a keen golfer and having the golf course on our door step was another attraction. We are therefore very disappointed that the Golf course is likely to be going and that Hoo will be turned into another urban sprawl that we were so keen to get out of. After only a year of living in a home we are beginning to explore other areas to move to as it is no longer going to be the village that we fell in love with.

We strongly oppose the plan and hope that the views of Hoo residents will be taken into account.

Yours faithfully,

Dr Nicola Reynolds and Bryan Church



**maryott, kyle**

---

**From:** [REDACTED]  
**Sent:** 25 June 2018 09:06  
**To:** futuremedway  
**Subject:** Planning Team - Hoo Peninsula  
  
**Categories:** Blue Category

Good Morning,

I am writing to give my thoughts on the plans in place for housing in the Hoo Peninsula.

I feel that this would diminish the village that we currently live in and we would lose all character as a community.

The infrastructure in Hoo at the moment is not sufficient enough, having recently experienced a long delay in trying to join either local Doctors surgeries in the village with major waiting lists and some even closed books.

By adding more houses to the community without even thinking about improving and bettering the infrastructure that we currently have, I feel that this is thoughtless and unfair to all current villagers who experience struggles within the village.

Many Thanks,

Sent from my iPhone

**maryott, kyle**

---

**From:** [REDACTED]  
**Sent:** 25 June 2018 09:07  
**To:** futuremedway  
**Subject:** Response - Local plan

**Categories:** Blue Category

Hello

Please can you add my views below to the consultation:

Hoo Peninsula is being over burdened by this plan. Hoo does not have the infrastructure to support the incredible number of houses proposed. There has already been months of chaos caused by the collapse of the road due to building in the Bells Lane area. Incidences such as this will increase if this plan is to go ahead. Hoo Peninsula is accessed by one Road. If this plan goes ahead it may be impossible to get on and off the Peninsula. Plans should include new roads, transport links such as railways and also schools and GP surgeries. This plan achieves none of this. And provided extremely limited investment in the area. The amount of houses proposed are unsustainable in the current infrastructure, particularly sewers and drains.

I strongly object to the plan in the current state and wish this to be noted.

Regards,

Kate Morrissey

[REDACTED]  
[REDACTED]  
[REDACTED]

**maryott, kyle**

---

**From:** [REDACTED]  
**Sent:** 25 June 2018 09:22  
**To:** futuremedway  
**Subject:** Medway local plan

**Categories:** Blue Category

To whom it may concern,

I wish to register my objection to Medway Councils proposed further development of the Hoo Peninsula. As a resident of Hoo, I am all too aware of the existing strain being placed on our schools, doctors, roads and other vital community services, by the constant housing development that has already occurred here over the last few years. Wholesale development of the Peninsula, seemingly without any consideration to vital social infrastructure, will turn this area into a dysfunctional ghetto. The road network alone should prevent further housing; Four Elms roundabout, the only viable route to access/egress the Peninsula, is already a congestion and pollution nightmare. Whilst I recognise the necessity for further housing development, please have consideration for those of us who already chosen to make Medway our home and do not destroy what is a totally unique and special part of the country.

Yours Sincerely,

Sean Clarke

Sent from my iPad



**MEDWAY COUNCIL LOCAL PLAN 2012-2035  
DEVELOPMENT STRATEGY  
REGULATION 18 CONSULTATION  
RESPONSE TO PUBLIC CONSULTATION ON  
BEHALF OF HOMES ENGLAND**

JUNE 2018

## Contents

1. INTRODUCTION.....	1
2. HOMES ENGLAND'S ROLE AND OBJECTIVES IN RELATION TO LODGE HILL .....	4
3. THE CORE CASE FOR ALLOCATING LODGE HILL FOR UP TO 2,000 HOMES TO FACILITATE IT'S COMPREHENSIVE REGENERATION AS PART OF THE HOO RURAL TOWN.....	6
4. LOCAL PLANNING POLICY AND REGENERATION CONTEXT FOR LODGE HILL .....	14
5. EXISTING AND EMERGING NATIONAL PLANNING POLICY.....	26
6. RESPONSE TO SECTION 3 OF THE LPDS – THE SCALE OF GROWTH AND HOO PENINSULA RURAL TOWN .....	34
7. RESPONSE TO SECTION 3 OF THE LPDS – THE DISTRIBUTION OF DEVELOPMENT AND DEVELOPMENT STRATEGY SCENARIOS .....	43
8. RESPONSE TO SECTIONS 4-12 OF THE LPDS – DRAFT POLICY APPROACHES .....	59
9. RESPONSE TO ALTERNATIVE SITES WITHIN MEDWAY .....	94
10. RESPONSE TO THE LPDS SUSTAINABILITY APPRAISAL (SA) .....	99
11. OVERALL CONCLUSIONS .....	105

## Appendices

Appendix 1	Lodge Hill site boundary and Homes England's land ownership
Appendix 2	Letter from MACC International dated 27 March 2018
Appendix 3	Homes England's Outline Biodiversity Conservation Strategy
Appendix 4	The Lodge Hill Housing Trajectory
Appendix 5	Lodge Hill Benefits Statement

Status: Final

Date: 25 JUNE 2018

For and on behalf of GVA Grimley Limited

# 1. INTRODUCTION

## I. PURPOSE OF THESE REPRESENTATIONS

- 1.1 These representations have been prepared by GVA on behalf of Homes England in response to Medway Council's (MC) Local Plan Development Strategy (Regulation 18) Consultation (LPDS, March 2018). Homes England's principal interest in the development strategy relates to the future of Chattenden Barracks and Lodge Hill Training Camp (referred to as 'Lodge Hill'). This former defence land, in military use for some 141 years, is now owned by Homes England (see Location and Ownership Plan, Appendix 1).
- 1.2 These representations complement those submitted by the Hoo St Werburgh Consortium, a consortium of land owners/promoters with sites located in the vicinity of Hoo St Werburgh and Chattenden, who have agreed to collaborate to jointly promote their respective land interests through the emerging Medway Local Plan. Homes England is one of five consortium members; the others are:
- Dean Lewis Estates;
  - Gladman Developments;
  - Taylor Wimpey; and
  - The Church Commissioners for England.
- 1.3 The Consortium has a shared vision for the expansion of Hoo St Werburgh and Chattenden into a sustainable rural town delivering around 7,000 new homes together with supporting infrastructure (Lodge Hill would deliver up to 2000 of these dwellings). The Consortium has prepared a document, the 'Hoo Development Framework', which was submitted in support of the Local Plan Development Options Consultation (LPDO, May 2017) and outlines the vision, key principles and preliminary strategy for delivery agreed by the Consortium. The latest Regulation 18 representations from the Consortium supplement and update this framework. MC is in the process of appointing consultants to prepare a development framework of its own for the Hoo Peninsula Rural Town (HPRT), work that will feed into the Regulation 19 Local Plan.
- 1.4 Homes England is preparing a vision document specifically for Lodge Hill that builds on the principles in the emerging Hoo Development Framework. This will be finalised once the Council's proposals become clearer. In the meantime, these representations draw upon this initial work and a detailed evidence base in relation to the Lodge Hill site.

- 1.5 It is in this submission document that Homes England provides its response to the LPDS. These representations also, where appropriate, provide comments on the supporting evidence base to the emerging Development Strategy, including available information on alternative sites (the Strategic Land Availability Assessment 2018 update was not available at the time of writing) and the updated Local Plan Sustainability Appraisal (SA) 2018.

## II. PURPOSE OF THE LPDS

- 1.6 It was between January and February 2016 that MC consulted on the Local Plan Issues and Options document under Regulation 18. This consultation did not set out policies or identify specific development sites; instead it invited comments on contextual matters and broad approaches that could form part of the new Local Plan Strategy. MC subsequently consulted (again under Regulation 18) in early 2017 on its Local Plan Development Options (LPDO). This set out a draft vision and strategic objectives for the area and highlighted four potential development options available to meet Medway's identified needs over the Plan period (2012-2035).
- 1.7 The current LPDS consultation (under Regulation 18) builds on the LPDO by outlining a draft Spatial Development Strategy (Policy DS2) which broadly focuses upon regeneration of brownfield sites and the creation of a new 'Rural Town' on the Hoo Peninsula. This draft Spatial Strategy puts forward four 'scenarios' for comments:
- Scenario 1 – Meeting Objectively Assessed Need;
  - Scenario 2 – Investment in infrastructure to unlock growth;
  - Scenario 3 – Meeting the Government's proposed calculation of local housing need; and
  - Scenario 4 – Consideration of development within Lodge Hill SSSI.
- 1.8 Scenarios 1, 2 and 3 include development within the Lodge Hill site, but outwith the SSSI, amounting to c.550 homes. Scenario 4 is the only one that assumes the 'optimum' or higher capacity scale of development sought by Homes England of up to 2000 homes. This approach is a major concern for Homes England and constitutes a significant component of the response in this submission.
- 1.9 The LPDS also identifies a set of draft policy approaches upon which Homes England comments. Responses are also provided to the evidence based documents, namely the available information relating to currently available Strategic Land Availability Assessment (SLAA) and the updated Sustainability Appraisal (SA).

### III. CONTENT OF HOMES ENGLAND'S REPRESENTATIONS

1.10 These representations are structured as follows:

- Section 2 – Homes England's Role and Objectives in relation to Lodge Hill.
- Section 3 – The Case for a Higher Capacity Lodge Hill Allocation (up to 2,000) homes as part of the Hoo Peninsula Rural Town (HPRT).
- Section 4 – Local Planning Policy and Regeneration Context for Lodge Hill.
- Section 5 - Existing and emerging National Planning Policy.
- Section 6 – Response to Section 3 of the LPDS – The Scale of Growth and Hoo Peninsula Rural Town (HPRT).
- Section 7 - Response to Section 3 of the LPDS – The Distribution of Development and Development Strategy Scenarios.
- Section 8 – Comments on Sections 4 to 12 of the LPDS – draft Policy Approaches.
- Section 9 - Response to Alternative Sites within Medway.
- Section 10 – Response to the Sustainability Appraisal (SA).
- Section 11 – Overall conclusions.



## 2. HOMES ENGLAND'S ROLE AND OBJECTIVES IN RELATION TO LODGE HILL

- 2.1 Homes England is the Government's National Housing, Land and Regeneration agency for England with responsibility for inter alia:
- Improving the supply and quality of housing in England;
  - Securing the regeneration or development of land or infrastructure in England;
  - Contributing to the achievement of sustainable development and good design in England with a view to meeting the needs of its people; and
  - Helping to stimulate local economic growth by using land and investment, attracting private sector investment in local areas.
- 2.2 Lodge Hill is a large previously developed publicly owned site, which has specific challenges, but offers significant potential for new housing in an area of substantial housing need. The future of the site falls squarely within Homes England's regeneration remit.
- 2.3 In January 2018, the site was transferred to Homes England from the Defence Infrastructure Organisation (DIO). This move reflects the Government's view that Homes England is the only organisation with the expertise, powers, capacity to address the issues raised by the site.
- 2.4 As the new national housing delivery vehicle, Homes England is charged with bringing together its existing planning and development expertise with land buying powers to secure land for new homes, in particular, vacant and underused brownfield sites in public ownership. This will be critical if the Government's housing target of c.300,000 homes per annum is to be met by the mid 2020's. Homes England is entirely committed to bringing forward new homes at Lodge Hill in line with the Government's policy to use surplus public land to speed up housing delivery, but in a manner that acknowledges the need to address other key issues, including nature conservation and regeneration issues.
- 2.5 Lodge Hill is a unique site and it brings with it technical challenges that the market alone will not fix (the withdrawal of Land Securities from its development partnership with DIO in 2015 confirms this point). Project affordability; development viability and the resolution of environmental issues are priority considerations. Homes England is the single organisation that has been set up by Government to resolve this type of problem head-on and is committed to finding (with partners) an appropriate solution to provide a long term and sustainable future for Lodge Hill.

- 2.6 In these circumstances, 'do-nothing' or 'do-minimum' is not an option for Homes England. Something radical must be done and within the current plan period, to ensure that the site can be a resource that meets housing delivery and other important objectives and will not continue to be a neglected area, which is likely to deteriorate; an ongoing risk to human health and safety and a significant drain on the public finances.
- 2.7 Homes England has taken on Lodge Hill to ensure that, in line with historic planning policy, it is regenerated and a positive re-use solution agreed. This solution must be underpinned by a bespoke spatial planning strategy enshrined within the Medway Local Plan which, in itself, has regeneration of the Borough at its core. This strategic approach will ensure the orderly and proper planning of both this site and the wider Hoo St Werburgh Rural Town strategic allocation. It is recognised however, that the impact of development must be balanced alongside other important interests, especially community health and safety, nature conservation and heritage. Homes England has undertaken a significant amount of technical work to create the best possible evidence base; evaluate relevant impacts and draw up proportionate mitigation and compensation strategies, where necessary, in accordance with the NPPF and best technical practices.
- 2.8 The case in favour of the early and comprehensive regeneration and re-use of Lodge Hill is, in Homes England's view, compelling. The role of the site as an integral component of the HPRT, reinforces this contention. It is for the Medway Local Plan to grasp this nettle from a planning perspective, and for Homes England (working with partners) to deliver the appropriate investment and development solution. Homes England is the only organisation capable of managing the risks and achieving this objective at the pace and with the scale demanded. In the following section the case for the allocation of Lodge Hill in the Local Plan is set out in further detail.

### **3. THE CORE CASE FOR ALLOCATING LODGE HILL FOR UP TO 2,000 HOMES TO FACILITATE IT'S COMPREHENSIVE REGENERATION AS PART OF THE HOO RURAL TOWN**

- 3.1 In these representations Homes England has highlighted some of the principal concerns it has identified in relation to the Regulation 18 Consultation Development Strategy. The case for the comprehensive regeneration of Lodge Hill as an integral component of the Hoo Peninsula Rural Town (HPRT) is compelling. This view has shaped the representations and is informed by a robust and up to date evidence base and analysis of the site's opportunities and constraints. This work has created a firm foundation for the emerging regeneration proposals. It is Homes England's contention that if the Medway Local Plan is to "plan positively" as required by the NPPF, then it is essential it provides for the regeneration of Lodge Hill in this spatial plan and that the proposals are delivered effectively and in a viable form. A decision on the allocation of Lodge Hill cannot be delayed without prejudicing plan delivery and creating a significant financial burden for the public sector.
- 3.2 To assist in the Council's understanding of Homes England's case for a Local Plan allocation for up to 2,000 dwellings at Lodge Hill, the principal propositions in support of the allocation are outlined below. These are in summary form, but can be expanded through discussions with the Council if this would be helpful.

#### **Proposition 1 - Lodge Hill is a Key Element of the HPRT**

- 3.3 The comprehensive regeneration of the Lodge Hill site is a Government priority. It has been identified as a significant brownfield development opportunity for a number of years in local and regional plans. The emerging vision and masterplan demonstrates that in terms of place-making the site will provide an innovative, well-designed and high quality development that is integral to the design, development and delivery of the Hoo Rural Town, providing an unrivalled opportunity for the provision of ecological mitigation and compensation and of a high quality environment. The emerging Medway Local Plan, if it is to be "positively prepared" (NPPF paragraph 182), must provide a clear vision and strategy (supported by policy) for the regeneration of Lodge Hill. Its development as part of the HPRT provides an opportunity for a comprehensive plan for the strategic development of the area, providing for the regeneration of a large contaminated

brownfield site and a high quality environment for the new town. Failure to include it would compromise the delivery of all of those aims.

## **Proposition 2 - No Development at Lodge Hill is not an Option**

- 3.4 At some 325 hectares, Lodge Hill is one of the largest brownfield sites in the South-East. Since the Ministry of Defence declared the site surplus to requirements, it has lain vacant and unused. Government policy is to re-purpose surplus public land, primarily for housing, where possible. The detailed technical investigations by Homes England have shown that this is entirely possible at Lodge Hill. At present, Lodge Hill is a totally unproductive resource that is placing an increasing burden on the public purse. It would fly in the face of Government policy not to take the opportunity to facilitate the reuse and regeneration of the site. Development is necessary to achieve positive re-use and Homes England has been given the task of implementing this Government priority.

## **Proposition 3 – There is an Extensive Evidence Base Supporting the Allocation of the Site**

- 3.5 Since becoming involved in the site, Homes England has instigated a complete review of the evidence base and associated technical analyses. As a result Homes England's knowledge and understanding of the opportunities and constraints presented is up to date and in considerable depth. This technical work is comprehensive covering, inter alia, ground conditions and contamination (in particular unexploded ordnance - UXO), ecology, transport, heritage, economic impacts and property market considerations. In the light of this information, Homes England is confident that Lodge Hill can, and should, be developed. This will facilitate its comprehensive regeneration in a sustainable manner. Financial receipts from private sector residential led mixed use development will contribute significantly towards delivery of this plan.

## **Proposition 4 - The Development Plan has a central role to play in the regeneration of the site**

- 3.6 Paragraph 12 of the NPPF confirms that *"the development plan is the starting point for decision making"* and it follows that the emerging Local Plan should be the primary vehicle for allocating and setting the parameters for the regeneration of Lodge Hill. Homes England attaches significant weight to the need to ensure that the proposed regeneration of Lodge Hill takes place as a properly planned component of the HPRT and a core element of the emerging Plan. The site should be planned as an integral part of the HPRT and a development framework prepared by the Council in conjunction with

Homes England and the Hoo Consortium, to ensure appropriate integration and phasing of both development and supporting infrastructure.

### **Proposition 5 – The Site has a Key Role to Play in Achieving Sustainable Development in the District**

- 3.7 The Local Plan “must be prepared with the objective of contributing to the achievement of sustainable development” and it “should be consistent with the principles and policies set out in [the NPPF] including presumption in favour of sustainable development” (NPPF, paragraph 151). Local planning authorities should use their local plans “to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three” (NPPF, paragraph 152).
- 3.8 The detailed work done by Homes England has demonstrated that the development of the site, with up to 2,000 houses, represents the most sustainable option to deliver the necessary level of housing in the District. The Lodge Hill site has the largest capacity of any of the component ownerships within the Hoo Strategic Development Area. It is critical to the delivery of the HPRT and will make a significant material contribution to housing needs in Medway Borough. In so doing it will enable the implementation of a comprehensive regeneration project, involving substantial economic, social and environmental gains at national, regional and local levels. Alternative sites may be proposed to replace the (up to 2,000) homes at Lodge Hill, but none of these, either singly, or in combination, will provide the scale of benefits or a more sustainable way of contributing towards meeting local housing need than the proposals for Lodge Hill, a site that has, for a long period, been identified by Medway Council and regional bodies as suitable for residential development.
- 3.9 The proposal will provide much needed housing and will meet the three dimensions of sustainability and the need to plan positively as per the NPPF. On this basis, the Council should allocate Lodge Hill for a residential led mixed use regeneration scheme.

### **Proposition 6 – the Local Plan Must Plan Positively for Development in the Area**

- 3.10 The NPPF (paragraph 157) makes it clear that local plan should;
- “plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework”.
- 3.11 This is an important test in determining the ‘soundness’ of a plan (NPPF paragraph 182). In Homes England’s view the failure to put forward a cogent and effective policy for

Lodge Hill, in the emerging Local Plan, could result in the plan being found to be unsound by virtue of having failed to plan for the regeneration of such a large brownfield site within a strategic development location in the Plan.

### **Proposition 7 – The Development of the Site will Make a Significant Contribution to Meeting Local Housing Needs**

- 3.12 Medway is a Council that faces challenging housing delivery targets. Planning policy requires that there is a step change in delivery and the emerging Local Plan will be the principal vehicle to deliver this radical change. Homes England, as the Government's National Regeneration Agency, seeks to develop up to 2,000 homes as a key element of the comprehensive regeneration scheme. This contribution of circa 1,500 market and 500 affordable homes, will make a material contribution to meeting the housing need in Medway, a contribution the Council can ill-afford to ignore, given the scale of housing pressures locally.

### **Proposition 8 – The Proposal from Homes England Provides Certainty of Housing Delivery in a Sustainable Manner**

- 3.13 Homes England has the regeneration and development of brownfield land at the heart of its purpose. It is the one organisation nationally that has the powers, skills, capacity and resources to deliver the regeneration strategy for Lodge Hill. This means that the Council can be confident that the proposed 2,000 homes will be brought forward within the Plan period as per the housing trajectory accompanying this submission (refer to Appendix 4) with the significant benefits which are outlined in this section. Homes England, however, requires the support of a positive spatial planning policy to facilitate implementation. Without this, Lodge Hill will not be brought forward for development and substantial negative connotations will flow from this decision as outlined below.
- 3.14 Homes England has undertaken a thorough technical review of the Lodge Hill site and associated issues of delivery, and the agency is confident that it can bring forward a comprehensive and timely regeneration scheme as per its emerging vision and master planning proposals.
- 3.15 This development will be phased to enable the implementation of an innovative Nature Conservation Strategy for the site and parallel remediation works to address UXO and contamination concerns. Investment in this site improvement as a direct consequence of development will not only provide much needed homes, but also a long term and sustainable future for important nature conservation interests. No other realistic scenario would secure this enduring certainty of delivery.

- 3.16 Homes England's analysis of the alleged impacts of the regeneration of Lodge Hill demonstrates that they are proportionate and can be suitably mitigated and, in the case of nightingale, will be subject to carefully considered compensation measures as part of a comprehensive biodiversity strategy (refer to Appendix 3). These will accord with advice in the NPPF (paragraph 152).
- 3.17 Homes England can confirm that following transfer of the land to its ownership from the MoD, there are no legal constraints to site development. Equally, analysis of the policy context reveals that all salient policy requirements can be satisfied in line with advice in the NPPF.

### **Proposition 9 – Development of Lodge Hill will have Substantial Material Benefits which Are Not Otherwise Achievable**

- 3.18 The implementation of a scheme to regenerate Lodge Hill will deliver material benefits at national, regional and local levels and across a number of important areas. These include:-

#### **National**

- Construction of up to 2,000 homes on surplus public sector land, a national planning policy priority.
- A significant financial receipt to help fund the regeneration of the site.
- Delivery of a long term and comprehensive nature conservation strategy that will provide net environmental gains of national importance, including provision of Nightingale Compensation Land.

#### **Regional**

- The regeneration and remediation of a strategic, underused and derelict brownfield site for development which aligns with longstanding regional/ sub-regional spatial planning policy in the Thames Gateway regeneration area.
- The potential improvement of several woodland habitats across Kent and adjoining areas to facilitate nightingale population growth (these would complement the provision of Nightingale Compensation Land).

#### **District**

- **Economic** - The provision of significant direct and indirect employment in the construction phase (c.6,024 jobs) and c.200-350 permanent jobs in retail, employment and school uses on site. The new residents will provide increased retail spend (circa £48

million) and housing provision will contribute to job growth and hence local economic growth.

- **Social** - In addition to new housing, the proposals will provide a primary school, local services/ facilities and elderly person's accommodation. The facilities will substantially improve services provision available in the village of Chattenden.
- **Environmental** - The proposals will include around 48 hectares of net residential developable area (14.7% of the site) which will enable the provision of circa 259 hectares of open space and nature conservation areas on nearly 80% of the site. In addition, off site there will be proportionate areas of Nightingale Compensation Land provided in perpetuity, as well as appropriate woodland management sites (temporal lag sites) to reduce short term impacts on the bird population. No ancient woodland would be lost and any loss of protected grassland will be mitigated/ through direct replacement on site.

3.19 Homes England believes that these benefits are both significant and compelling in the context of the emerging Local Plan.

## **Proposition 10 - No Development at Lodge Hill would Lead to Material Harm**

3.20 Homes England contends that a decision to either reject development of Lodge Hill and/ or delay development, will lead to material harm for the following reasons:-

- Homes England would have no alternative, but to reconsider its involvement in promoting the site for regeneration, public infrastructure investment and vitally important new homes.
- This large brownfield site would continue to deteriorate and remain unused. As surplus public sector land, this would be a severely underutilised resource and contrary to national policy in that such land should be disposed of for beneficial re-use.
- In the absence of a beneficial re-use strategy, there would be a substantial ongoing liability including unaffordable management and security costs to the Exchequer.
- Expert opinion confirms that the site is a continuing risk to human health and safety as a direct result of the presence of UXO, contaminated land, hazardous substances and dangerous structures. This requires comprehensive and costly remediation. Without such work public access to the site will have to be controlled carefully in the interests of public safety and the site will not make a positive contribution to the well-



being of the surrounding local community and new residents of the HPRT (refer to Appendix 2).

- In the absence of funding to deliver much needed long term and ongoing environmental management, the nightingale habitat will be adversely affected due to the effects of urbanisation of the area through development associated with the HPRT. The lack of funding for management will also mean that the bird's favoured scrub thicket will become unsuitable and the species-rich grassland degraded. The Lodge Hill proposals will address these issues within a comprehensive strategy for nature conservation enhancement relating to the Lodge Hill and Chattenden Woods SSSI (refer to Appendix 3).
- In the absence of development, it will not be feasible to deliver and implement an appropriate mitigation and compensation strategy to protect and enhance, as far as practicable, the SSSI. This strategy, whilst incorporating a long term on-site management strategy, also proposes costly compensation and mitigation measures off-site to address identified impacts and provide overall net environmental gains in line with the Government's 25 year Environmental Plan.
- A failure to provide up to 2,000 homes proposed at Lodge Hill will have significant adverse implications for the effectiveness of the Local Plan Housing Delivery Strategy.
- A failure in the emerging Local Plan to identify a viable and deliverable solution to support the comprehensive regeneration of Lodge Hill would be contrary to the objective of achieving the proper planning of the Hoo Strategic Development Area, which, given its core role in the Council's housing strategy, should be at the heart of delivering a positively prepared and, hence, sound local plan.
- It is important to note that the Regulation 18 Local Plan scenarios (save for Scenario 4) propose a "do minimum" housing allocation at Lodge Hill. This allocation would be too small (and capital returns too low) to fund the management regime necessary to secure the long term future of the site.

## Conclusion - The Overall Balance

- 3.21 The NPPF makes it clear that local plans must be prepared with the objective of contributing to the achievement of sustainable development and should seek opportunities to achieve each of the three dimensions of sustainable development, and net gains across all three (paragraphs 151 and 152). Following a wide ranging evaluation, Homes England has concluded that there will be significant economic, social and environmental benefits arising from the proposed development. These will derive from a regeneration scheme of exemplar design that will contribute hugely to the place-making

quality of the HPRT of which Lodge Hill is an integral component. In the absence of the project, Medway Council will have to identify sites for an additional (up to) 2,000 homes, a highly challenging task in the light of local environmental and infrastructure constraints, and another source of funding will need to be found to underpin the regeneration of the site and ongoing management, to maintain its nature conservation status. This in practice, is highly unlikely, mindful of the substantial pressure on the public purse. Homes England can, however, only deliver its ambitious and visionary proposals with the full support of Medway Council and appropriate policies in its emerging Local Plan. It is concluded that, having regard to the Development Plan and other material considerations, the overall balancing exercise is firmly in favour of an allocation at Lodge Hill for residential-led mixed use, development of up to 2,000 homes, together with supporting uses and infrastructure.

## 4. LOCAL PLANNING POLICY AND REGENERATION

### CONTEXT FOR LODGE HILL

#### I. INTRODUCTION AND BACKGROUND

- 4.1 This section sets out the planning and regeneration context for the allocation of Lodge Hill, Chattenden for a regeneration scheme of up to 2,000 homes together with local retail and employment uses, open space and supporting green and highways infrastructure. The boundary of the Lodge Hill site proposed for a residential allocation is shown on the Plan at Appendix 1 edged with a red line. The Lodge Hill site amounts to c.325ha in total of which c. 47.8ha would be the net developable area.
- 4.2 Early in 2018 the Lodge Hill Training Area and Chattenden Barracks were transferred from the Defence Infrastructure Organisation (DIO) to Homes England's ownership. This brought to an end some 141 years of military use, with the site used continuously over this period for munitions storage and associated training. Inevitably, this use has resulted in there being significant constraints to any future alternative use(s) including the presence of unexploded ordnance, chemical contamination, dangerous structures and deep water bodies. These site conditions will require extensive remediation prior to development and to enable any form of public access to the site. Resolving this challenging military legacy will be a key influence on the shape of any future regeneration strategy for the site, alongside other factors, including environmental considerations, the need to address a significant local housing shortage and project funding /viability.
- 4.3 Paragraphs 3.52 and 3.61 of the LPDS outline the latest position with respect to the Lodge Hill site. This provides a reasonable summary and for sake of brevity, it is not proposed to repeat this contextual information here.
- 4.4 The purpose of Homes England's submission to this Local Plan Regulation 18 consultation is to ensure that the Lodge Hill higher capacity option of up to 2,000 homes is incorporated into the Council's Regulation 19 preferred development scenario. To this end, the main components of Homes England's hybrid preferred development scenario (which draws on all four scenarios identified by MC) have been set out in Homes England's representations in response to consultation Question DS1 later in this document. A smaller development (e.g. c.550 homes) would not have the potential funding credentials or wider benefits that the larger scheme would provide and would consequently not trigger the comprehensive regeneration process that Lodge Hill requires.

## II. IDENTIFICATION OF THE NEED FOR DEVELOPMENT AND HISTORIC PLANNING POLICY

4.5 Lodge Hill being located within Medway district falls within the Thames Gateway sub-region which since the mid-1990's has been seen by Government as a priority for investment and growth. The potential of the site to contribute towards the delivery of necessary growth through the accommodation of a new freestanding settlement has long been recognised by planning policy documents at regional and local levels as indicated below:

- RPG9a (1995) recognised that Lodge Hill could allow a more sustainable relationship to be created on the Hoo Peninsula in terms of the balance between residential and employment uses.
- The Kent and Medway Structure Plan (1996) identified Lodge Hill as a major development opportunity outside the urban boundary.
- The Thames Gateway Inter Regional Planning Statement (2004) referred, in the medium to long-term, to a mixed new community at Lodge Hill.
- Creating Sustainable Communities: Delivering the Thames Gateway (ODPM 2005) explicitly referred to the site as one of six major housing development locations within the Medway Strategic Development Location.
- The Thames Gateway Interim Plan Development Prospectus (2006) identified the capacity of the site to deliver over 5,000 new homes.
- The Kent and Medway Structure Plan (2006) allocated Lodge Hill as a Strategic Development Location to provide a new village scale mixed-use community in the period to 2016 and beyond. It referred to it as being the only substantial area of previously developed land outside the urban area that could support development on such a scale. The Structure Plan Panel Report (2005) concluded, in the context of the alternative locations before them, that the site was an appropriate location for the delivery of a new settlement, in part by virtue of it having been previously developed (by comparison with the greenfield alternatives).
- The South East Plan (RS) 2009 articulated a number of objectives including the accommodation of major new communities, and the community infrastructure required by the sub-region. The supporting text explicitly identified the site as a major regeneration location (specifically on 'MoD land at Chattenden') within the supporting text to Policy KTG1 (RS paragraph 19.5) to accommodate new dwellings, employment and services.

4.6 Whilst the historic policy position predates the designation of the majority of the Lodge Hill site as a SSSI, it underscores the strategic regeneration opportunity provided by all or part of this large brownfield site. The emerging Local Plan proposal for the HPRT essentially

- builds upon this historic strategic development policy, which identified this area for strategic development.
- 4.7 The adopted Development Plan comprises the saved policies of the Medway Local Plan (2003). It recognises that the site has long term development potential for business, educational and residential uses and clarified that this would be considered through the first review of the Medway Local Plan. Subsequently Lodge Hill was proposed as a location for development in the Medway LDF Core Strategy. However, in November 2013 this plan was withdrawn following Natural England's confirmation of a SSSI notification earlier that month. MC also prepared a development brief for Lodge Hill (Dec 2011) which sprang from Core Strategy Policy CS33 which proposed the site for a new settlement prior to abandonment of the Core Strategy by the Council and is now out of date.
- 4.8 The growth and regeneration of the Thames Gateway (including Medway) remains a Government priority. This regeneration area is a core component of wider regional development and investment planning through the Thames Estuary Growth Commission, South East Enterprise Partnership (SE LEP) and supporting partnerships. The SE LEP has secured three rounds of local growth funding from Government based on its 2014 Strategic Economic Plan and locally, MC participates in the Thames Gateway Kent Partnership which has major ambitions for successful growth.
- 4.9 Medway's ambitious agenda for growth is reflected in key policy documents referenced in the LPDS including the following:
- Medway Council Plan 2016-2021;
  - Thames Gateway Kent Plan for Growth 2014-2020; and
  - Medway 2035: Waterfront City, Connecting innovation, people and place.
- 4.10 This analysis of past planning policy emphasises the point that the primary policy drivers for the regeneration of Lodge Hill remain as critical as ever. Indeed, with the emergence of the HPRT, the strategic policy imperative has increased. The sole reason for potentially rejecting this approach has been the designation of the extended SSSI on the site. Although clearly important, this designation needs to be weighed in the balance in relation to other material planning considerations, including the presumption in favour of sustainable development; local housing need and public safety considerations.
- 4.11 Historically, MoD uncertainty over the availability of the site has held up regional and local regeneration ambitions for development. Critically, this uncertainty has, with the Government's involvement of Homes England, been entirely removed. The Government's remit to the agency is to facilitate the early regeneration of the site with

- inter alia new homes bringing together money, land, expertise and planning powers to accelerate the supply of new homes and address affordability issues. The emerging spatial planning framework should reflect this strategic objective and enable delivery of this important investment as far as practicable.
- 4.12 The emerging Medway Local Plan is being prepared within the context of this focus on regeneration and growth. As indicated above, previous stages of consultation on the Local Plan made reference to the possible use of land at Lodge Hill for a new settlement on the Hoo Peninsula. An outline planning application for Lodge Hill was submitted by the Defence Infrastructure Organisation/Land Securities in February 2014 for mixed use including some 5,000 dwellings, employment and retail uses and supporting infrastructure. This replacement application involved development of former military land designated as a SSSI. Medway Council resolved to support this application with a resolution to approve in 4<sup>th</sup> September 2014, but on 13<sup>th</sup> February 2015 it was Called-in by the Secretary of State. Following further survey and evaluation work by DIO/Homes England, in September 2017 the outline planning application for proposed development at Lodge Hill was withdrawn and the public inquiry cancelled.
- 4.13 In late January 2018, land at Lodge Hill was transferred from MoD ownership to Homes England. Prior to this date, Homes England carried out a substantial amount of fresh survey and evaluation work to provide a detailed understanding of the site. It is utilising this information to assess the impact of potential development on the environmental interests of the site and concerns regarding unexploded ordnance and contamination. Homes England is preparing a much changed and fresh development proposal for land at Lodge Hill based on this new analysis of the site. The new proposals are significantly reduced in scale from the withdrawn Outline Planning Application, reflecting a new strategy to address nature conservation, human health and safety and public access issues on the site. Whilst seeking to minimise impacts on the SSSI, the higher capacity proposal (up to 2000 homes) does involve some development on land designated as an SSSI.
- 4.14 Homes England is looking at a radically different strategy that secures net biodiversity gains, in perpetuity, and aims to address concerns with respect to public safety as a consequence of unexploded ordnance and other dangers. This would be funded through development returns provided by other parts of the site. Site remediation will be costly and potentially unaffordable to the public purse without a significant injection of funds from private sector investment. It is vital therefore that the proposals for the site are both achievable and viable. In considering new proposals for the site, Homes England is collaborating closely with Natural England in compiling its evidence base and assessing

- its emerging approach for the management and development of Lodge Hill. Discussions have also been held with the RSPB.
- 4.15 The SSSI at Chattenden Woods and Lodge Hill Training Area not only affects the Homes England land ownership, but also the northern part of the Council owned Deangate Ridge Golf Course site. There will be other sites owned by other private sector developers in the vicinity of Lodge Hill whose proposals may affect the SSSI interests, directly or indirectly, and potentially on a cumulative basis. As part of the Local Plan process in evaluating Lodge Hill and the Hoo Rural Town allocation, Medway Council will need to assess these cumulative (and in combination) impacts in a thorough way using a consistent method of evaluation (please refer to NPPG on Environmental Impact Assessment - Paragraph: 024 Reference ID: 4-024-20170728). Homes England is well advanced in its evaluation of impacts on the SSSI and this bespoke approach (which has Natural England's broad approval) could inform analysis of these wider implications to ensure a common methodology is devised to inform the Local Plan process. Initial discussions with MC indicate a willingness to adopt this approach. Further details of Homes England's proposals are provided below.

### III. THE REGENERATION IMPERATIVE FOR LODGE HILL AND ADDRESSING MEDWAYS LOCAL HOUSING NEED

- 4.16 Chattenden Barracks and Lodge Hill Training Area were used operationally by the Ministry of Defence from 1875 to 2016 when the site was vacated by the military. This long history of military use has resulted in a significant legacy which, in the public interest, must now be addressed.
- 4.17 The use of the site by the War Office began following its purchase in 1875. Magazines to store gunpowder were built and a barracks was also constructed to accommodate personnel to guard the site. The magazine compound and barracks were linked to naval storage facilities at Upnor on the River Medway by a narrow gauge railway. In 1899, the development of the adjoining Lodge Hill site enabled the entire facility to become a Royal Navy Ordnance Depot, where munitions storage and preparation took place. Chattenden and Lodge Hill continued to be used for ammunition storage through both World Wars until 1961. Thereafter, the site was used as extensive barracks and training facilities for the Joint Service Bomb Disposal School which moved here in 1966.
- 4.18 Prior to its closure, Lodge Hill Camp was the home of 33 Engineer Regiment (EOD); the Defence Explosive Ordnance Disposal School (DEODS) and subsequently the combined Ministry of Defence/Home Office sponsored National Search Centre (NSC).

- 4.19 The site provided training grounds for these organisations, including explosive search training, and live explosive demolitions, bridge-building and other engineering training also took place, along with a specialist diver training facility.
- 4.20 Inevitably, as a consequence of some 141 years of defence use associated with explosives storage and training, the site suffers from a significant legacy centred upon the presence of a range of inert and live bombs, weapons and other munitions. Such items could be found anywhere within the site (many purposefully hidden), although some areas such as the former Lodge Hill Training Area are likely to contain a greater density of munitions than areas around Chattenden Barracks, for example. Some degree of search and unexploded ordnance (UXO) clearance has been undertaken, but this has not been carried out on a systematic or recorded basis.
- 4.21 Homes England has taken advice from Specialist Consultants, MACC International Ltd, who have undertaken a UXO risk assessment of the site and provided advice on future clearance strategy. They have provided a letter dated 27th March 2018 that summarises the position (see Appendix 2). Attention is drawn to paragraph 2.2 of this letter which states '*...that the level of risk to human safety and well-being on this site from an uncontrolled encounter with unexploded ordnance is significant and a higher risk than that normally encountered on former MoD training establishments of this type...*'. Paragraph 3.1 goes on to state, '*Although some parts of the site are currently fenced off, the potential risk associated with public access to potential danger areas cannot be overstated mindful that UXO poses a significant risk to public safety. The proposal for a Hoo Rural Town of c.7,500 homes, which includes this site, will exacerbate the level of risk because of the increased population in the vicinity, making site regeneration a significant priority in order to protect public safety.*'
- 4.22 Paragraph 5.1 (under site clearance and mitigation) states 'Regardless of the eventual use of the site, and whether or not development takes place; it remains apparent that given the known UXO risks on site, the land cannot reasonably be left in its current state given major health and safety concerns.' Paragraph 5.4 concludes 'If UXO mitigation were to take place based on a reasonable and practicable approach with reliance certification in place post mitigation, then it is considered by MACC International Limited that the phased remediation of the Lodge Hill area, coupled with the provision of significant housing to contribute towards local housing needs in Medway district is wholly achievable. Such remediation could also be designed to limit disruption to important habitats, enabling an appropriate balance to be achieved between critically important site regeneration and housing development, and the protection of key conservation interests.'



- 4.23 The advice from the experts at MACC International is unequivocal. The site cannot be left in its current state without there being significant health and safety concerns with respect to unrestricted access to the site by members of the local community, an issue that can only be exacerbated by the proposal for a Hoo Rural Town of perhaps 7,000 homes directly adjacent.
- 4.24 The potential Local Plan allocation site at Lodge Hill according to a recent (2018) detailed landscape inspection remains roughly 33% brownfield in character based on the NPPF definition of 'previously developed land' (refer Annex 2 Glossary). A number of these areas contain former MoD operational structures/sites that will require demolition/remediation to be rendered safe/free from contamination.
- 4.25 At around 325ha (803 acres), Lodge Hill is one of the largest previously developed sites in the South East. For a number of years planning policy has identified the site as a key opportunity for regeneration in the Thames Gateway Regeneration Area. The emerging Local Plan Strategy for brownfield regeneration reinforces this focus. Whilst the nature conservation interests associated with the SSSI designation are clearly important, these will need to be balanced against the wider benefits that a comprehensive and sensitively planned regeneration solution could bring, including an overall net gain to the environment and biodiversity. Ultimately, however, Homes England recognises that it will be necessary for the proposals to be demonstrated to be sustainable development in accordance with advice in the NPPF if the site is to be allocated in the emerging local plan.
- 4.26 It is evident that the presence of UXO and other contamination, confirmed by the MACC International risk assessment, means that the legacy of military use needs to be remediated as a matter of urgency. In the absence of remediation, the site will remain a major risk to human health and safety and the need to manage and secure the site and prevent public access using costly security measures will become a growing drain on the public purse. The public sector, including the landowner and Local Authority, cannot afford this proposition.
- 4.27 It is for this reason that the Government has required Homes England, the National Regeneration Agency, to acquire the site from the MoD. Homes England is uniquely placed to address the issues arising from this complex site, but can only do so with a positive strategic planning regime in place guided by the emerging Local Plan. Two matters are therefore clear, first, these risks to human health and safety cannot be left for the next Local Plan to resolve and, secondly, to translate the site into a regeneration opportunity, will take considerable resources and commitment. This means a spirit of compromise and significant public and private investment is needed if an appropriate outcome between all competing interests is to be achieved.

---

ADDRESSING MEDWAY'S HOUSING NEED

- 4.28 One of the priorities for Medway Council is identifying sufficient housing land through the Local Plan process to meet its Objectively Assessed Housing Need. The genesis of Medway's approach to defining its development needs is set out in the LPDS consultation report (page 24) and is not repeated here. The main issue arises from the Council's decision to base three of its development scenarios on its 2015 'Strategic Housing Market Assessment' (Scenarios 1, 2 & 4); only scenario 3 responds to the Government's proposed 'Standard Method'. The Council expresses major concerns in the LPDS about the impacts of adopting the 'Standard Method' figure on the Borough in relation to impacts on infrastructure delivery and environmental capacity. The Council will have to provide a very robust argument not to use this approach, in the light of Government policy guidance which requires demonstration of 'exceptional' circumstances. This matter is discussed further in paragraphs 7.10 and 7.19
- 4.29 Against this background, the provision of up to 2,000 homes at Lodge Hill would not only ensure the delivery of a comprehensive and viable regeneration scheme, but will also go some way towards reducing the housing delivery deficit in the Borough. Equally, up to 2,000 homes would constitute roughly 26% of the total difference between the Council's Objectively Assessed Need figure and that flowing from the 'Standard Method'. This substantial contribution in helping Medway to satisfy local housing needs, alongside a deliverable regeneration strategy that will secure the beneficial re-use of Lodge Hill, including extensive land remediation and the retention/enhancement of nature conservation assets (supported by a comprehensive mitigation and compensation package), must surely be considered fully, as a key component of the Regulation 19 Local Plan Development Strategy.

## IV. DESCRIPTION OF THE EMERGING REGENERATION PROPOSALS

- 4.30 Homes England has accepted fully that the previous Land Securities scheme for up to 5,000 homes could not be justified in technical terms and that the site evidence base was partial and required a comprehensive update to provide a more nuanced understanding to inform site proposals. This work has been largely completed, including the formulation of bespoke impact modelling to assess the potential implications of development at Lodge Hill and part of the HPRT on the nightingale population at Lodge Hill.
- 4.31 The new proposals for up to 2,000 homes show a significant reduction in scale from the previous withdrawn planning application for up to 5,000 homes. There will be, however, some elements of development within the SSSI designation, though, proposals have sought to avoid core areas of nightingale and grassland interest (the ancient woodland

would also not be affected). These proposals should be seen within the context of the wider regeneration of the site, coupled with the delivery of a comprehensive net gain biodiversity conservation strategy and the need to fund and deliver an appropriate scheme.

- 4.32 Homes England is looking to achieve a new approach that, in balancing up the key drivers, secures the key environmental interests of the site in perpetuity and, at the same time, resolves important concerns about public access and site safety resulting from UXO. This critically important strategy will be delivered by resources realised through financial contributions from development on other parts of the site. The evidence base and these fresh proposals have been shared with Natural England by Homes England and discussions are ongoing about the emerging approach to assessing impacts and the management and development of land at Lodge Hill. The outcome of these discussions has been constructive and bodes well for a progressive dialogue with respect to the future of the site. Discussions have also taken place with the RSPB.
- 4.33 Significant new ecological survey and evaluation work has helped to shape the new proposal that seeks to direct development to the western and southern parts of the site, around Chattenden Barracks and Lodge Hill Camp. All of the ancient woodland and land to the north-east of the site would remain undeveloped, subject to wide buffer protection, and managed for its long term conservation value. A strategy is being prepared to enable a parallel process of contamination/UXO remediation, sensitive, as far as practicable, to retaining long term environmental interests, but recognising that health and safety concerns are a significant material consideration in planning terms.
- 4.34 The emerging Homes England proposal involves the delivery of a residential led scheme of up to 2,000 homes as a part of the wider strategic development of the HPRT. It would incorporate land for a primary school, over 31ha of public open space, and a mixed use 'hub' containing community uses, small retail units and employment land. The ecologically led masterplan essentially concentrates development around two areas – expanding the existing Chattenden Village and a new complementary village at Lodge Hill Camp. As the LPDS consultation document confirms, development of an expanded Chattenden would aim to integrate sensitively with the extant village as well as possible development that may come forward on adjacent land (e.g. Gladman's land to the east and Deangate Ridge Golf Course) as part of the Hoo St Werburgh strategic growth location. A major benefit of this planned approach is that the existing village of Chattenden has a limited range of facilities/ services and this new development would help address these concerns as part of a balanced and sustainable plan for an expanded village.

- 4.35 Homes England is preparing a vision document containing an investable masterplan concept for Lodge Hill. This will promote an innovative, well designed and high quality development that will align with the Council's HPRT masterplan and the Hoo Consortium's Development Framework. In Homes England's view its thinking on scheme visioning is robust and supported by a detailed and up to date evidence base. The 'Vision' will describe a direction of travel that will very clearly give the HPRT, including Lodge Hill, the bright and sustainable future it deserves.
- 4.36 A large part of the resource applied to Lodge Hill by Homes England has been invested in ecology. The NPPF (and draft revised NPPF) provides a high level of protection from development that would result in significant harm to land designated as a SSSI and Homes England recognises fully the need to respond in detail to mitigate/compensate for this harm in terms of creating a balanced case for regeneration. The NPPF, in the first instance, directs local planning authorities to seek to avoid development likely to have an adverse effect on special interest features within a SSSI. The one exception is in circumstances where the benefit accrued by the development would clearly outweigh the impacts on the features of the site, and any broader impacts on the network of SSSI's (para 118 NPPF). If significant harm resulting from a development cannot be avoided, then adequate mitigation measures and, if necessary, compensation measures can be considered (NPPF Para 152; draft NPPF para 173).
- 4.37 Homes England has drawn up a comprehensive nature conservation strategy and mitigation and compensation package (refer to Appendix 3). This addresses in terms, the potential impacts on the three main features of the SSSI designation namely, nightingale, ancient woodland and MG5 grassland. Impacts on the latter two features can be avoided/mitigated within/adjacent to the sites. In contrast the impacts on nightingale can be partially addressed within the site, but will require compensation land to be provided off-site in order to ensure that an biodiversity net gain is achieved overall. This work has utilised a bespoke evaluation framework to assess potential impacts on nightingale and sets out deliverable mitigation and compensation proposals. This package is probably unique in terms of its ambition and purpose. In this regard, it is important to note that the Lodge Hill site is c.325ha, and of this area c.47.8ha will form the net developable area in the emerging masterplan. This means that up to c.259ha will be allocated for nature conservation purposes, open space and green infrastructure. Hence, around 80% of the Lodge Hill site will be managed for conservation/open space purposes and just c.14.7% utilised for net residential development, a compelling statistic in the planning balance debate.
- 4.38 Homes England has also drawn up a Sustainability Appraisal (SA) specifically in relation to the Lodge Hill site. This complements the nature conservation and mitigation

compensation package and has informed the development of the emerging Vision and Masterplan.

- 4.39 The above proposals are not yet finalised but the information submitted demonstrates a clear direction of travel and a robust commitment from Homes England to do what is necessary to provide a balanced, deliverable and sustainable regeneration concept for Lodge Hill. This proposition of comprehensive regeneration and re-purposing of the site is overwhelmingly superior to the idea of Lodge Hill remaining derelict and neglected, with no reasonable prospect of a comprehensive regeneration scheme being either affordable or deliverable in a certain or timely manner.

#### V. PUBLIC BENEFITS ARISING FROM THE REGENERATION OF LODGE HILL

- 4.40 It is evident that the regeneration of Lodge Hill will result in a range of significant economic, social and environmental benefits. These will need to be weighed in the balance alongside any identified harm to the Chattenden Woods and Lodge Hill SSSI and the wider network of SSSI's as per NPPF guidance.
- 4.41 Work by Homes England (including the Lodge Hill SA) concludes that the economic, social and wider environmental benefits from the scheme will combine to provide a sustainable development. Harm to environmental features will be avoided, mitigated or addressed through proportionate compensation measures (principally Nightingale Compensation Land). The Nature Conservation Strategy at Appendix 3 sets out this approach in detail. Further evidence is provided in the Benefits Statement relating to the proposals found at Appendix 5. This confirms that there will be substantial economic gains including:

##### Construction Phase

- 2,400 jobs (direct employment)
- 3,624 jobs (indirect/induced employment)

##### Operational Phase

- C. £52m gross annual income to scheme occupiers
- C. £48m additional leisure / retail spend
- 200 – 350 total jobs in employment, retail, primary school

- 4.42 To these important benefits, should be added the key social benefits arising from the development. These will primarily include up to 2,000 market and affordable homes to be built in an area where there is a current and persistent local housing need meaning the site could play a key part in enabling Medway Council to meet its housing need

requirement. Social benefits will also arise from the additional infrastructure being brought to the area including provision of a new primary school, services associated with new retail and employment facilities and the potential provision of elderly persons accommodation much needed in the area. These services will enhance local provision at Chattenden Village in a significant way, given the dearth of facilities currently present, adding to the social benefits accruing to the project.

#### SUMMARY

4.43 This section demonstrates that:

- First, the Lodge Hill site has been identified for a number of years in regional and local spatial plans as a strategic regeneration opportunity.
- Secondly, comprehensive regeneration of the site is essential to ensure that it is not a severely underutilised resource and that UXO and contamination can be remediated in a timely manner to address public health and safety concerns.
- Thirdly, 2,000 homes at Lodge Hill will make a material contribution to satisfying Medway's housing need, particularly in the context of application of the 'Standard Method' of calculating OAHN.
- Fourthly, Homes England's proposal includes a comprehensive nature conservation and biodiversity strategy, involving proportionate mitigation and compensation measures.
- Finally, there will be significant public benefits arising from the proposals in terms of economic, social and environmental net gains.

## 5. EXISTING AND EMERGING NATIONAL PLANNING POLICY

5.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how they are expected to be applied. It provides a framework within which local planning authorities and local people can produce their own local plans which reflect the needs and priorities of their communities.

5.2 The emerging Medway Local Plan is subject to the policy guidance set out in the current NPPF (2012) and, in particular, those policies set out in the section on 'Plan Making' (paragraphs 150 to 185). Para 151 states:

"Local plans must be prepared with the objective of contributing to the achievement of sustainable development"

5.3 Paragraph 152 goes on to say:

"Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate."

5.4 Paragraph 182 of the NPPF highlights the tests of soundness for a local plan, namely, it should be:

- Positively prepared;
- Justified;
- Effective; and,
- Consistent with national policy.

5.5 In addition, paragraph 47 is relevant. This requires local planning authorities to ensure their local plan meets the full, objectively assessed needs for market and affordable housing (bullet point one) and in bullet point two, underlines the need to identify a supply of specific deliverable sites to provide five years' worth of housing. The word 'deliverable' is defined in Footnote 11. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a 'realistic prospect' that housing will be delivered in five years and development viable. The

reference to a 'realistic prospect' of delivery has been subject to debate over whether or not a site is properly 'deliverable' i.e. 'certain' or 'probable' of delivering housing within five years. This is a key issue for the Medway Local Plan and the Government has sought to tighten up this definition in the draft NPPF (see below).

## **POLICIES IN THE DRAFT NPPF**

- 5.6 On 5<sup>th</sup> March 2018, the Government published the 'draft revised NPPF' for public consultation. The consultation closed on 10<sup>th</sup> May 2018. There are some key changes from the extant NPPF and, although the revised NPPF is still in draft, it is likely that the Medway Local Plan will be examined against the policy requirements of the new NPPF<sup>1</sup>. Homes England would encourage MC to have regard to the thrust of emerging NPPF policy requirements in considering representations resulting from this Regulation 18 Consultation and as it starts to prepare the Regulation 19 plan.
- 5.7 It is on this basis that Homes England wishes to shine a light on specific key policies in the draft NPPF that are likely to help shape the Council's response to the Regulation 18 responses and its preparation of the Regulation 19 draft Local Plan.
- 5.8 The following concentrates on new or amended policy requirements that will be important in influencing the drawing up of the Regulation 19 draft Local Plan. To ensure consistency, much of the first half of the analysis builds upon the submission prepared by the Hoo Consortium of which Homes England is a member. There are, however, additional elements inserted to ensure that the specific issues raised by Lodge Hill are properly covered as a context to the subsequent representations. The references to draft policies relate to the following topics:
- Section 2 – Achieving sustainable development;
  - Section 3 – Plan making;
  - Section 5 – Delivering a sufficient supply of houses;
  - Section 8 – Promoting healthy and safe communities;
  - Section 11 – Making effective use of land; and,
  - Section 15 – Conserving and enhancing the natural environment.

### **I. ACHIEVING SUSTAINABLE DEVELOPMENT**

- 5.9 The draft NPPF re-confirms that the purpose of the planning system is "achieving sustainable development" (para. 7). Para. 8 goes on to explain that:

---

<sup>1</sup> Para 209 of the draft NPPF states that "policies in the previous framework will apply for the purposes of examining plans where those plans are submitted on or before [six months after the date of publication]". The Government has indicated that it is aiming to publish the Final Revised NPPF in summer 2018. Therefore it is very likely to be in force for the anticipated submission of the Medway Local Plan in March 2019.



“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across the different objectives)”

5.10 Para. 8 goes on to broadly define the scope of the three objectives: economic, social and environmental.

5.11 With regard to the three sustainable development objectives, Para. 9 states that:

“These objectives should be delivered through the preparation and implementation of plans and the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”

5.12 The ‘*presumption in favour of sustainable development*’ is set out at Para. 11. For plan making this means:

“a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic plans should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

## II. PLAN MAKING

5.13 A notable change in the draft NPPF is that ‘Plan Making’ has been promoted from the back to the front of the document. In terms of content the draft NPPF is now making a distinction between ‘strategic’ policies and ‘local’ policies, with this approach carried through into Section 3.

5.14 There is a continued focus on sustainably meeting development needs, with a particular focus on housing. To this end Para. 24 states:

"They should have a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. They should, as a minimum, plan for and allocate, sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be met more appropriately through other mechanisms, such as brownfield registers or local policies)".

- 5.15 Para. 34 defines a site-specific approach to viability and developer contributions, including levels of affordable housing:

"Plans should set out the contributions expected in association with particular sites and types of development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, green and digital infrastructure). Such policies should not make development unviable, and should be supported by evidence to demonstrate this. Plans should also set out any circumstances in which further viability assessment may be required in determining individual applications."

- 5.16 Paragraph 35 references a renewed emphasis on sustainability appraisals. It also references the approach to addressing significant adverse impacts:

"Strategic and local plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."

- 5.17 Para. 36 sets out the revised test of soundness:

- a) "Positively prepared – provides a strategy which will, as a minimum, meet as much as possible of the area's objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enables the delivery of sustainable development in accordance with the policies in this Framework."

### III. DELIVERING A SUFFICIENT SUPPLY OF HOMES

5.18 Para. 60 re-emphasises the Government's objective of 'significantly boosting the supply of homes'.

5.19 Para. 61 introduces the heavily trailed requirement to use the 'standard method' to calculate objectively assessed housing need:

"In determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals." (underlining added)

5.20 Para. 68 includes the previous requirement that strategic plans identify a supply of "specific, deliverable sites for years 1-5" and "specific, developable sites or broad locations for growth for years 6-10 and where possible 11-15 of the plan".

5.21 Paragraph 73 emphasises the Government's support for large scale development as a means of supplying large numbers of new homes, including:

'...new settlements or significant extensions to existing villages or towns.'

5.22 Para. 74 includes the requirement to set out an anticipated delivery trajectory over the plan period, and the requirement to identify on an ongoing basis a minimum of five years supply against their housing requirement. The five year land supply calculation should include a buffer (moved forward from later in the plan period) of:

"a) 5% to ensure choice and competition in the market for land; or

b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or

c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply"

- 5.23 Paragraph 75 refers to a five year supply of 'deliverable' housing sites... Importantly, the Government has adopted a different approach to the definition of 'deliverable' in the draft NPPF. The footnote has gone and in the glossary at the back of the document, an entirely new definition is set out; one that is much dearer and more realistic. The definition is now worded so that only sites for which there is a 'presumption of inclusion' are; small sites, and sites with detailed planning permission. For all others, including sites with outline planning permission, the draft wording presumes against their inclusion unless *'there is clear evidence that housing completions will begin on site within five years'*. This is the opposite to the current approach which assumes that all sites with planning consent and all allocations are to be included in the five year supply (as well as SHLAA sites, where appropriate). This is a critical policy change and one that Homes England believes will help to introduce greater clarity and certainty into the planning process.

#### **IV. PROMOTING HEALTHY AND SAFE COMMUNITIES**

- 5.24 Paragraph 96 requires planning policies and decisions to promote 'public safety'.

#### **V. MAKING EFFECTIVE USE OF LAND**

- 5.25 This part of the draft NPPF brings a significant focus to bear upon making as much use as possible of previously developed or 'brownfield' land' (except where this would conflict with other policies in the framework).
- 5.26 Paragraph 118 adds further details stating that planning policies and decisions should:
- "a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access;
  - c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated and unstable land;"

- 5.27 Paragraph 119 highlights the need for local planning authorities to take a pro- active role in bringing forward *'land that may be suitable for meeting development needs, such as sites...held in public ownership.'*

#### **VI. CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT**

- 5.28 Paragraph 168 indicates that planning policies would contribute to, and enhance, the natural and local environment by:

"d) minimising impacts and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

- 5.29 Paragraph 173 specifically mentions the principles to adopt when determining planning applications which may affect a SSSI:

"b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;"

- 5.30 This approach reflects the current NPPF (para 118) and the principles lying behind this policy are clearly relevant in the context of development at Lodge Hill, albeit within the context of an emerging local plan.

- 5.31 Paragraph 176 addresses planning policies pertinent to ground conditions and pollution. In this regard they should ensure:

"a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);

b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and

c) adequate site investigation information, prepared by a competent person, is available to inform these assessments."

## VII. IMPLICATIONS FOR THE EMERGING MEDWAY LOCAL PLAN

- 5.32 The current NPPF requirements for local plan preparation have been well rehearsed elsewhere, but it is evident that the draft revised NPPF is likely to result in specific policy changes which will have substantial implications for the next stage of preparation of the Medway Local Plan.

- 5.33 The most far reaching of these changes are largely related to boosting the supply of homes, a Government (and Homes England) priority. The most notable of these revisions will:
- Establish the use of the 'Standard Method' for calculation of Objectively Assessed Need (as per the Chief Planner's letter to Medway Council dated 30 January 2018). This matter is discussed later in these representations and goes directly to the soundness of the plan.
  - Place greater emphasis on early viability testing of plan allocations and on developer contributions being addressed through the Plan Making process. This will entail increased reliance on ensuring a robust, properly costed Infrastructure Delivery Plan forming a key component of the evidence base.
  - Introduce a change to the definition of housing 'delivery' to ensure that a more certain or probable outcome is achieved. This will have important ramifications for the evaluation of the robustness of the Council's SLAA.
  - Continue to ensure that the focus of Plan Making will be upon achieving sustainable development (noting a more explicit linkage between Sustainability Appraisal and soundness). This means that the paragraph 11b) test will be a foremost consideration in determining whether or not, as a minimum, objectively assessed need can be accommodated.
- 5.34 A further notable thread in the draft NPPF is the requirement to make as much use as possible of brownfield land and for local authorities to take a pro-active role in bringing forward land for development held in public ownership. This is clearly material to the planning status of Lodge Hill.
- 5.35 Finally, the draft NPPF policy in relation to development within, or outside, an SSSI and which is likely to have an adverse effect on it, follows that set out in the current NPPF, namely that development should not normally be permitted where an adverse effect on the site's notified special interest features is likely. The only exception is where the benefits of the development would clearly outweigh the harm. Where significant harm is unavoidable, mitigation is required, with compensatory measures being delivered if adequate mitigation cannot be secured. This advice has been critical in shaping Homes England's planning strategy aimed at achieving the sustainable and comprehensive regeneration of the Lodge Hill site.
- 5.36 The national planning policies discussed in this section have informed Homes England's responses to the questions highlighted in the LPDS document.

## 6. RESPONSE TO SECTION 3 OF THE LPDS – THE SCALE OF GROWTH AND HOO PENINSULA RURAL TOWN

6.1 In this section Homes England responds to Consultation Questions 1 and DS1:

### QUESTION 1

When developing the local Plan, what things do you think the Council should consider about the scale of the development needed to support Medway's growth and provide sustainable development?

6.2 Homes England believes that Medway Council (MC) has highlighted most of the key factors that will guide Medway's scale of growth and influence discussions on sustainable development in the Consultation Development Strategy, subject to the responses outlined in relation to Question DS1 below. Homes England supports the adoption of the 'Standard Method' of calculating objectively assessed housing need (OAHN) (see below). It is acknowledged however, that MC meeting the 'Standard Method' housing target (as required by the Chief Planner's letter of 30<sup>th</sup> January 2018 and draft NPPF) consistent with achieving sustainable development and delivering appropriate and timely investment in supporting infrastructure and services upgrades, will be a challenge for the Authority. The Council will need to strike a difficult balance between developing a scenario that meets objectively assessed housing needs and protecting the character and key environmental assets of the Borough and seeking net biodiversity gains. Homes England would encourage MC to attach substantial weight to the significant need for all types of housing (including affordable homes) in Medway on sites that are both available and deliverable in order to address a real and persistent problem of undersupply of houses in Medway.

### QUESTION DS1

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

6.3 In responding to this question, Homes England has taken on board the representations of the Hoo Consortium of landowners/developers, of which the agency is a member.

6.4 Homes England, like the Consortium, is pleased to see that the LPDS has placed significant weight behind the principle of the 'Hoo Peninsula Rural Town' (HPRT) as sustainable development. Homes England views the regeneration of the Lodge Hill site supported by up to 2,000 homes as a core component of this proposal, if a comprehensive development strategy is to be implemented, which will secure the

sustainable and proper planning of this area. This scale of development is necessary if an appropriate level of funding is to be secured to deliver both the extensive site regeneration proposals and off-site compensation land to address nature conservation impacts. Hence, whilst Homes England supports the inclusion of the HPRT as a key element of the spatial development strategy for Medway as set out in the Policy DS2, it would also wish to see reference made to the comprehensive regeneration of Lodge Hill in this policy. A revised policy should reflect the following:

“...outside of the urban regeneration areas, the Council will support the development of a small rural town based around Hoo St Werburgh that is designed to the highest standards and sensitivity to respect its countryside setting; secures the comprehensive regeneration of the Lodge Hill former defence site and is supported by significant infrastructure investments. The development will be in accordance with a masterplan to secure the balance of land uses, attractive and effective green infrastructure, phasing to reflect the delivery of improvements required to ensure the remediation and improvement of the Lodge Hill site and delivery of a range of services and infrastructure....”

(new amended text underlined)

- 6.5 Homes England considers that it is entirely appropriate that HPRT (including Lodge Hill) should form a key component of the spatial development strategy as it is in accordance with national planning policy. The agency agrees with the robust justification for incorporating HPRT in the spatial development strategy as described in paragraph 3.26, but with a minor amendment (underlined) as follows:

“In reviewing the options available to positively prepare a plan for Medway’s sustained growth, the development of a rural town on the Hoo Peninsula was assessed to potentially provide a core component of the strategy. This would support and complement the urban regeneration dimension, providing for a wide range of development. The rural town would also provide a basis for enhancing the sustainability of the peninsula, through a strengthened economic and social offer and investments in the wider environment.”

- 6.6 Given the emphasis in the NPPF on local plans securing ‘sustainable development,’ (reinforced in the draft NPPF), a summary rationale confirming the belief that the HPRT comprises sustainable development, is provided below. Reference is also made to the technical work being undertaken by the Consortium and Homes England to ensure that the Council’s ambitions (reflected in the draft Development Strategy) will be realised.



## I. SUSTAINABLE DEVELOPMENT

6.7 The Hoo Development Framework Document (HDFD) submitted in support of the LPDS representations provided an evidence base that demonstrates that HPRT comprises sustainable development. As the Hoo Consortium's submission says, the HDFD is largely still relevant, although there has been a significant reduction in the scale of development at Lodge Hill to take into account a new evidence base and concerns about the potential environmental impacts, which will be addressed as part of the latest proposals from Homes England which involve a substantial mitigation and compensation package of measures. The Lodge Hill position is addressed in more detail in Section 6. As regards the remainder of the Hoo Rural Town, the Hoo Development Framework Document (HDFD) demonstrates that from an environmental perspective, the following strategic environmental considerations will need to be taken on board:

- The Consortium's land is not subject to any national landscape designations such as AONB or National Park;
- The Consortium's land is not within the Green Belt;
- Save for part of the Lodge Hill site that falls within the Chattenden Woods and Lodge Hill SSSI, the land to be developed within the Consortium's ownership is not the subject of any international, national or local nature conservation designations. It is noted, however, that potential indirect impacts on the SSSI will need to be evaluated in an objective manner.
- The southern parcel of land within Consortium ownership is located within the Tower Hill to Cockham Wood SSSI, albeit the proposed development area is stepped back from this designation. The cumulative impact on the SSSI elements is likely to be tackled through Local Plan policy adopting for example, the development of strategic green infrastructure across the Rural Town, careful access management to, and within the network of SSSI's, and tailored green infrastructure proposals as part of each development to limit recreational pressures on the designated sites funded via developer contributions.
- The Consortium's land does, however, lie within 4kms of the Medway Estuary and Marshes SPA, Ramsar and SSSI as does the Thames Estuary and Marshes SPA, Ramsar and SSSI. The cumulative (in combination) impacts on the SPA/Ramsar elements will be captured through targeted access management measures (already identified across the Hoo Peninsula) and would be funded through the Strategic Access Mitigation and Management Plan (SAMM's) and bespoke greenspace mitigation.
- The Consortium's land proposed for development is not within Flood Zone 3.

- 6.8 It is evident from the above that the majority of the Consortium land is not adversely affected by strategic environmental constraints. Where such constraints exist, they can be largely addressed through avoidance of sensitive locations or appropriate mitigation of impacts.
- 6.9 The proposed ecological strategy in respect of Lodge Hill is based on a thorough understanding and assembly of a robust evidence base. This technical work has thrown significant light on the complex set of factors that will influence the comprehensive regeneration of this important site and the balance that needs to be struck between the provision of much needed homes and protecting/ensuring the long term attractiveness of the site as an environmental benefit, with respect to the international significance of the SSSI designation. To this end, Homes England has devised a robust mitigation and compensation strategy to address ecological impacts with a view to generating a net biodiversity gain in line with NPPF para 9 which seeks "*net gains for nature*".
- 6.10 Following a dialogue with Natural England, this technical work has also identified a further issue for discussion in that whilst the Homes England proposals will clearly have an impact upon the Chattenden Woods and Lodge Hill SSSI, notwithstanding wider greenspace and green network provision in the Hoo Development Framework as indicated earlier, there will also be direct and indirect cumulative effects stemming from the development of other sites within the Consortium's land ownership. These cumulative disturbance/urbanisation/recreational effects will need to be evaluated in a consistent manner as part of the emerging Local Plan process. Further work will be required to create a strategic framework that will enable the scope, zone of influence, method of assessment and implications for each development site to be defined. This will then feed into a mitigation/compensation package that will help determine the extent to which Consortium members would have to contribute to implement this package. Homes England has advised both MC and the Hoo Consortium of this issue and it is understood that MC will facilitate an early discussion on how this matter should be addressed as part of the Local Plan Regulation 19 preparation and publication process.
- 6.11 Homes England is continuing its dialogue with Natural England on this subject and is seeking to gain their agreement to a bespoke strategic evaluation framework in relation to the Lodge Hill SSSI, which can then be rolled out to inform the wider impact assessment of the Hoo Rural Town proposals. The next stage will be to discuss the scope and context of the emerging evaluation framework with Medway Council and other relevant stakeholders.

## SUSTAINABLE DEVELOPMENT – STRATEGIC OPPORTUNITIES PROVIDED BY THE HOO RURAL TOWN (INCORPORATING LODGE HILL)

6.12 As the Consortium's representations (and HDFS) confirm, the HPRT will provide the opportunity to secure net gains across all three dimensions of sustainable development as set out in NPPF (paragraph 7) and draft NPPF (paragraph 8).

### ECONOMIC

6.13 Significant housing development at HPRT must be accompanied by an appropriate quantum and mix of economic activity. In this regard, it will be important to optimise the proximity of Hoo St Werburgh to the sub-regionally important employment site at 'Kingsnorth' (also known as London Medway Commercial Park) and ensure that opportunities for local employment are fully realised. The proposal to expand the village to create a sustainable rural town has the potential to contribute directly towards facilitating economic opportunities in Medway in several ways:

- **Enhanced connectivity** – The scale of development proposed would be sufficient to deliver better connectivity from Hoo St Werburgh to the urban area, including new highways infrastructure and frequent public transport links. These improvements would enhance accessibility to the employment area, increasing its attractiveness to business.
- **Local employment and housing opportunities** – construction of the HPRT will provide a number of jobs for local people, increasing the economic output of the area. Its construction will also provide the opportunity for a significant increase in the local labour pool and skills base, thereby enhancing the attractiveness of the Peninsula (and Kingsnorth in particular) as a business location.
- **Complementary mixed uses and services** – Importantly, the Rural Town (including Lodge Hill) will diversify the mix of uses and services in Hoo St Werburgh including a wider range of shops, community and leisure facilities and open space. These facilities will provide a variety of local jobs for new residents, as well as ensuring that the rural town would become an attractive place for potential employees of businesses at Kingsnorth, thereby helping to encourage businesses to relocate to the area.

### SOCIAL

6.14 Medway is an area that, for several reasons, has failed to deliver sufficient housing to meet its objectively assessed housing needs, a topic that is discussed elsewhere in this submission. As alluded to above, it is critical to Medway's future economic success, that the authority meets, in full, its housing targets in order to address its acute need for both market and affordable homes. The HPRT proposal is of sufficient scale to provide the

broad range of housing sizes and types required to accord with the NPPF. This development will be supported by a broad range of social and community infrastructure commensurate with the size of this new town, including schools, medical centres and sports facilities. Lodge Hill as the largest site within the HPRT will provide an appropriate share of these facilities, namely a primary school; local retail and services centre and employment hub (These services will improve facilities with Chattenden village which is poorly served at present). It will also provide a permanent nature conservation facility of regional (if not national) importance.

## ENVIRONMENT

6.15 The impacts of the HPRT upon strategic environmental constraints have been discussed earlier. Where constraints have been identified these can be addressed properly through avoidance, mitigation and/or compensation. Nevertheless, inevitably as the Consortium notes in its submissions, the HPRT will change the character and environment of Hoo St Werburgh and its surrounding rural environs. This is an inevitable result of development in order to meet an acute local shortage of homes.

6.16 Homes England concurs with the views of the Consortium in its support for the Council's aspirations as described in the LPDS (para 3.28):

"The greatest care and attention needs to be given to sensitively planning growth around Hoo St Werburgh to respect the countryside setting and links to the wider estuary."

6.17 This sentiment is further underscored in Policy DS2 Spatial Development Strategy (LPDS page 36).

6.18 Homes England has collaborated closely with the other members of the Hoo Consortium to prepare the strategic landscape and visual assessment in the HDFD. This assimilates the Homes England draft masterplan work for Lodge Hill to create an updated master plan for the strategic development area ensuring that sensitive views and landscapes are protected as part of the proposed 'Green Framework.' Further work is required on the emerging plan to ensure that this Green Framework can contribute towards mitigation of ecological impacts on, inter alia, Lodge Hill SSSI and other designations as well as acting as a new environmental resource for recreation for existing and new residents of the HPRT. This was a key output from the MC facilitated workshop held on Thursday 24<sup>th</sup> May 2018. Homes England notes that the Hoo Consortium has taken on board the principles discussed at the workshop and has updated the original development framework. The latest version is appended to the Hoo Consortium representations. Homes England endorses this updated masterplan, which includes the Lodge Hill proposals and land use budget.

- 6.19 In the light of these net gains it is Homes England's view that the HPRT (including Lodge Hill) is sustainable development and its inclusion in the LPDS will ensure that the plan will comply with the tests of soundness and the presumption in favour of sustainable development.
- 6.20 The eastern expansion is a long term strategy and as such Homes England would strongly advise MC to focus upon the delivery of the required housing trajectory for the first 5 years of the plan as part of the HPRT 'core' proposal. Mindful of advice in the current and draft NPPF, this must be a priority for the Council to ensure the soundness of the Plan at Examination.

## II. EVOLVING MASTERPLAN

- 6.21 Homes England and the other Consortium members have worked in partnership to build up the evidence base and draw up the initial masterplanning presented in the HDFD. As a result of ongoing liaison with the Council and other key stakeholders, the plan has evolved to create a more refined masterplan for the HPRT which reflects MC's ambitions highlighted in the LPDS. This plan has taken on board the latest thinking for the Lodge Hill masterplan which has been informed by the detailed evidence base amassed by Homes England following ongoing surveys and technical evaluations. It is understood that MC intends to appoint a consultant to prepare its own masterplan for the HPRT. Homes England strongly advises MC to ensure that this work has full regard to the latest HDFD and Lodge Hill proposals.
- 6.22 The key areas of the HDFD where important progress has been made are described in the Consortium's representations (Section 5). It is not intended to repeat this information here other than to say that Homes England would endorse the comment (para 5.19) that *'as far as possible services and facilities are brought forward alongside housing development, and infrastructure planning will be set out as part of the Infrastructure Delivery Plan.'* Homes England will ensure that as part of the comprehensive regeneration plan for Lodge Hill, all physical infrastructure, supporting uses, land remediation and provision of green infrastructure are phased to ensure an appropriate balance between early delivery of homes and effective environmental protection/enhancement. The delivery strategy will also complement phasing of site development in the wider strategic allocation to ensure a coherent approach across the entire HPRT.
- 6.23 The Consortium's representations also discuss the potential eastern expansion of the HPRT in the direction of a new passenger rail line. Homes England is broadly supportive of this proposal but would endorse the comments at paragraph 5.31 of the Consortium's submission. Simply put, given the deliverability of the Consortium's 'core' rural town

proposals, the further technical work needed to confirm the feasibility of the eastern expansion should not delay the Local Plan process. The most appropriate approach would be to bring this proposal forward (when fully evaluated) through an early review of the Plan, when there will be greater certainty around development delivery.

### III. SUMMARY

- 6.24 In response to Question DS1, Homes England (which is a member of the Consortium) welcomes the general support for the HPRT provided in the LPDS and in Policy D2 specifically. Homes England is committed to protecting and preserving a viable habitat alongside much needed housing and would contend that, if the Council is to ensure the proper planning of the HPRT, then the Lodge Hill development option of up to 2,000 homes must be integral to this strategic development proposal. Failure to support this proposal will rule out the bringing forward of a comprehensive and viable regeneration strategy for Lodge Hill; a site that badly requires remediation and positive re-use, but at the same time could deliver up to 2,000 homes in an area of acute housing shortage.
- 6.25 Homes England would endorse the view articulated by the Consortium in its representations that the HPRT (including Lodge Hill) will deliver net gains in the context of meeting all three sustainable development objectives (refer draft NPPF para 8), i.e. economic, social and wider environmental benefits, and as a consequence demonstrably comprises sustainable development. It is accepted by Homes England that the regeneration of Lodge Hill will impact directly on part of the SSSI, but this should be seen in context of the significant public benefits that this project will deliver, including net biodiversity gains through avoidance, mitigation or appropriate compensation measures coupled with improvements to public safety, that will outweigh any harm. The planning case for Lodge Hill has been outlined in Section 3.
- 6.26 Homes England is of the view that the identification of the HPRT (including Lodge Hill) as a key component of the spatial development strategy, alongside the urban regeneration focus, provides an appropriate strategic balance in the emerging Local Plan. This approach will ensure that the plan will accord with the tests of soundness (NPPF para 182 and draft NPPF para 36) and the presumption in favour of sustainable development (NPPF para 14 and para 11b draft NPPF).
- 6.27 Working with the Landowners' Consortium and MC, Homes England is keen to develop further, a detailed masterplan and Infrastructure Delivery Plan (IDP) for the HPRT, within which the Lodge Hill (up to 2,000 homes) proposal will be a core element (It is noted that a brief to appoint a masterplanner has been published by MC). It is considered that the emerging proposals put forward by Homes England and the Consortium are in accordance with the Council's emerging requirements set out in the LPDS (para 3.27).

- 6.28 Homes England looks forward to continuing to collaborate with MC and other stakeholders such as Natural England, to align both the Lodge Hill and wider HPRT proposals, as far as possible, with the emerging Local Plan in advance of the preparation and publication of the Regulation 19 Draft Plan. Part of Homes England's remit is to '*significantly boost*' the pace and scale of housing delivery in Medway, alongside other authorities in the region, and wishes to build on the current positive dialogue with the Council, to achieve this nationally important objective.

## 7. RESPONSE TO SECTION 3 OF THE LPDS – THE DISTRIBUTION OF DEVELOPMENT AND DEVELOPMENT STRATEGY SCENARIOS

### DEFINING DEVELOPMENT NEEDS (PAGE 24)

7.1 In this section, Homes England responds to consultation Question DS1, parts (b) and (c):

- **Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?**
- **What do you consider would represent a sound alternative growth strategy for the Medway Local Plan.**

7.2 Homes England, has in the earlier section, indicated its support in principle for the proposal from MC for the HPRT as a key plank of its spatial development strategy (Policy DS2). In considering the 'distribution of development' in the Borough, the LPDS puts forward four development 'scenarios' as follows:

- Scenario 1 – Meeting objectively assessed need;
- Scenario 2 – Investment in infrastructure to unlock growth;
- Scenario 3 – Meeting Government's proposed calculation of Local Housing Need; and
- Scenario 4 – Consideration of development within Lodge Hill SSSI

7.3 Homes England has previously made clear its view that the comprehensive regeneration of the Lodge Hill site must be incorporated into the HPRT proposal as a principal element of the Local Plan Spatial Development Strategy. Dialogue with MC has indicated that the four development scenarios are not mutually exclusive, rather, it is likely that the preferred development strategy will comprise a combination of different elements from more than one of these scenarios. With this in mind later in this section, the broad thrust of Homes England's preferred development scenario is described for MC's consideration. In addition, a response is furnished to the main differentiating elements that distinguish between the scenarios, followed by a more focused evaluation of the four scenarios themselves.

7.4 The main differentiating elements discussed are as follows:

- Identifying alternative development approaches;



- Making the most effective use of land;
- Calculating Objectively Assessed Housing Need (integral to the soundness of the local plan);
- Funding of much needed infrastructure delivery;
- The development potential of Lodge Hill; and
- Accommodating some residential growth in the small Hoo Peninsula villages.

## **I. IDENTIFYING ALTERNATIVE DEVELOPMENT APPROACHES**

7.5 Homes England recognises that MC has followed an iterative process of assessing land availability and sustainability within the Borough which has fed into the latest SLAA to support the preparation of the Local Plan (it is noted that at the time of writing the SLAA 2018 update was not published). This work has informed (and has been informed by) the Sustainability Appraisal (SA) and HRA.

7.6 Homes England has evaluated the latest information available in relation to potential alternative sites and has identified a number of concerns about the outcomes of this technical work, particularly that none of the alternatives scenarios could deliver a sufficient number of dwellings to meet the Standard Method housing requirement without the inclusion of a 2,000-dwelling allocation at Lodge Hill. These comments are set out in Section 8 of this submission. Comments on the SA are provided in Section 9.

## **II. MAKING THE MOST EFFECTIVE USE OF LAND**

7.7 Homes England welcomes the Council's approach that places regeneration of brownfield sites at the core of Medway's Development Plan. This accords with advice in the extant NPPF (para 111) and draft NPPF (para 117), both of which place an emphasis on the re-use of such land for development. Making the most effective use of land means that the Local Plan should contain policies which create a positive framework that encourages the appropriate re-use of all contaminated under-used and despoiled land in the district –both urban and rural- with the proviso that the proposals are suitable, deliverable and likely to be economically viable. Homes England also recognises that the bringing forward of a major site such as Lodge Hill will need to demonstrate compliance with sustainability criteria.

7.8 Homes England is confident that this case can be made in support of Lodge Hill as the benefits from a sustainable regeneration scheme will outweigh the disbenefits and can provide an allocation for sustainable development. In this context, it is critical to look at the bigger picture rather than focus upon interests in isolation. The regeneration of Lodge Hill will inevitably bring with it technical, delivery and resource issues that will need to be resource. In Homes England's view, these issues are capable of resolution and the project

will deliver material long term benefits for the Borough in line with the Local Plan vision and strategy for growth and will directly address the strategic objectives of the Plan (as well as 'Medway 2035').

- 7.9 Lodge Hill is a significant publicly owned brownfield site, therefore a Government priority for development and regeneration. This Local Plan is the appropriate vehicle through which to promote a positive sustainable future for this important site. The promotion of the HPRT provides an excellent context within which to address the future of Lodge Hill in a coherent and sustainable manner; it cannot be left to deteriorate further. It is in the public interest to make effective use of this site and Homes England is committed to this important task as required by Government.

### III. CALCULATING OBJECTIVELY ASSESSED HOUSING NEED

- 7.10 Homes England supports the broad thrust of the emerging Local Plan vision and objectives, together with the four principal components identified to deliver growth in Medway, based around; urban regeneration, establishment of the HPRT, a lesser scale of suburban/rural village expansion and provision of supporting infrastructure and services. The Agency has concerns however, about MC's approach to determining local housing need and hence the scale of growth.
- 7.11 In Section 4 of these representations, reference is made to a key change highlighted in the draft NPPF which is the requirement to use the Government's 'Standard Method' to calculate Objectively Assessed Housing Need (OAHN). The Chief Planners letter of 30<sup>th</sup> January 2018 to MC affirms this point. This requirement seeks to deliver on the NPPF (para 47) (and draft NPPF) advice that local planning authorities should '*boost significantly the supply of housing*' and also consider the use of an additional buffer to ensure choice and competition in the market for land over and above their 5 years' supply of housing.
- 7.12 As MC confirms (LPDS page 33; Table following para 3.51) the Standard Method OAHN figure for Medway is 37,143 homes over the plan period which equates to 1665 homes per annum. The Council's Strategic Housing Market Assessment (2015 SHMA) gives a figure of 1281 homes per annum, so use of the Standard Method results in a large increase. That said, Government policy advice is clear and failure to comply potentially raises a major issue in terms of the soundness of the emerging plan. This deficiency applies to three of the four development scenarios (1, 2 and 4). Scenario 3 seeks to satisfy this target, but remains short by some 1,182 homes. Homes England therefore, must express its concern that bearing in mind that the Regulation 19 draft Local Plan, is scheduled for publication in late 2018, the 'Standard Method' OAHN figure appears simply as an 'option' in this Regulation 18 consultation, and not as a 'policy thread' throughout all of the scenarios.

- 7.13 In line with the views expressed by the Hoo Consortium, Homes England believes that MC must accept fully the Standard Method calculation and adopt this as a starting point. The Council should aim to satisfy this requirement as far as possible, consistent with achieving sustainable development. It would not be appropriate for MC to seek to justify an alternative OAHN for the reasons set out below.
- 7.14 As indicated in Section 2, paragraph 61 of the draft NPPF is unequivocal in that the 'Standard Method' should be used unless there are 'exceptional circumstances' evident that justify a different approach. Although what is meant by 'exceptional circumstances' in this context is not defined, the term has clear resonance with its use in national Green Belt policy. On this basis the arguments in favour will need to get over a very high bar.
- 7.15 Homes England accepts that the policy directive provided in the Chief Planners' letter was published during preparation of the LPDS, but the thrust of the strategy appears to dismiss the Standard Method figure in favour of the lower 2015 SHMA calculation. If this alternative approach is to be adopted, then it will be necessary to demonstrate 'exceptional circumstances' or run the risk of the Local Plan being found unsound.
- 7.16 Paragraph 3.9 of the LPDS outlines MC's stance on the Borough's ability to meet the local housing need. This states:
- "It is recognised that areas may have important constraints, such as environmental designations, Green Belt, or physical constraints that restrict the ability to meet the needs in full. If this is robustly and soundly assessed, the plan may promote a housing target lower than the Local Housing Need figure. However, the council will be required to explore other options for meeting its area's housing needs, such as providing more land in a neighbouring borough."
- 7.17 Homes England does not believe that the above constitutes an 'exceptional circumstances' argument for an alternative OAHN methodology. Instead, this paragraph outlines the reasons why the OAHN cannot be met. It follows that this relates to the Local Plan development 'strategy' and the tests of soundness (NPPF para 182 and draft NPPF para 36) and the presumption in favour of Sustainable Development (NPPF 14 and draft NPPF Para II) and not the OAHN methodology.
- 7.18 Homes England would strongly encourage MC to accept the Standard Method figure as a clear benchmark and then consider whether or not there are demonstrable reasons why this cannot be accommodated having regard to the 'Presumption' in paragraph 11 b) (draft NPPF). If MC concludes that there are 'exceptional circumstances' that explain why the Standard Method figure cannot be accommodated without the '*adverse impacts of doing so significantly and demonstrably outweighing the benefits*' (draft NPPF

para 11 b) ii), then the evidence for this argument must be set out as part of the SA and SLAA.

- 7.19 In conclusion, Homes England concurs with the views expressed by the Hoo Consortium in relation to the use of the Standard Method figure. It would be inappropriate to seek to use an alternative approach to calculating the OAHN because it is the Council's view that the borough is environmentally constrained. The Standard Method should be adopted and subsequently a robust case made for 'exceptional circumstances' to justify a reduction in the figure. Homes England has a very clear remit from Government which is to contribute towards '*significantly boosting the supply of housing*' (NPPF para 47 and draft NPPF para 60) and, to this end, it will collaborate closely with the Council to help achieve this strategic growth objective in Medway.

#### **IV. DELIVERY OF INFRASTRUCTURE**

- 7.20 Homes England welcomes the Council's commitment to integration of the development scenarios with parallel delivery of necessary infrastructure and services. Timely investment in delivery of infrastructure will be central to the Council's growth ambitions and Homes England is willing to work in partnership with MC to facilitate this process where this is appropriate.

- 7.21 The criticality of infrastructure delivery is described in LPDS paragraph 3.39 which states:

"The scale and scope of potential growth requires significant investments in infrastructure to increase the capacity of transport networks, utilities and wider services to meet the needs of the area's growing population. The timely and effective delivery of infrastructure is critical to achieving the sustainable development of the rural town. Developers will be required to contribute to the funding of key infrastructure. The planning and phasing of delivery of the proposed strategic development allocation is informed by critical stages of infrastructure upgrades."

- 7.22 Homes England concurs with this statement and is engaging closely with MC, the Hoo Consortium and other key stakeholders to ensure that a robust and deliverable Infrastructure Delivery Plan (IDP) is put in place to underpin the HPRT allocation and Lodge Hill regeneration. Homes England looks forward to contributing towards the drawing up of the IDP as part of the preparation of the Regulation 19 Plan, mindful that addressing the costs of infrastructure delivery will be central to the deliverability of the Local Plan. In accordance with the representations made by the Hoo Consortium, it is recognised that, notwithstanding that the full extent and costs of infrastructure improvements required to bring forward the HPRT are unknown at this stage, it is considered that the bulk of the rural town can be delivered without Government

- funding. The possible exception is the Lodge Hill site which, because of its complex challenges may initially require public funding to facilitate its comprehensive regeneration, albeit this public investment will lever in significant private investment in development. This is one of the key reasons why Homes England, the Government's National Regeneration Agency, is seeking to regenerate the site because, uniquely, it has the powers, capacity and resources to speed up the delivery of new homes, in a manner that is sensitive to important environmental considerations.
- 7.23 In the context of this topic, Homes England notes that MC has sought 'additional' (Government) funding '*to invest in the improvements needed for strategic infrastructure to support growth over the plan period*' (para 3.40). The LDPS outlines the broad nature of the infrastructure improvements for which funding is sought, which incorporates improvements to the highway network (the Four Elms roundabout and widening of the A228) and the '*potential use of the Grain Freight Line for passenger traffic*' (LPDS para 3.42). Homes England notes that the latter forms part of a Housing Infrastructure Fund (HIF) bid to the Agency.
- 7.24 In general terms, Homes England, working with MC and the Hoo Consortium, would welcome the opportunity to investigate how timely investment in infrastructure may enhance the scale and pace of housing delivery within the HPRT allocation mindful, in particular, of real concerns about the capacity of the Four Elms stretch of the A228. As a note of caution, however, bearing in mind the very tight programme that the Council has proposed for the Local Plan, Homes England would encourage the Council to take a wholly realistic view on the timing and duration of the strategic infrastructure funding process. Fundamentally, this process should not hold up unnecessarily the delivery of the Regulation 19 Local Plan, given the priority attached to housing delivery and economic development, locally and nationally. This may require MC to consider the merits of bringing forward an early partial review of the Local Plan to address infrastructure led strategic development not capable of being finalised at this point in time.
- V. LODGE HILL**
- 7.25 The description of the current position appertaining to Lodge Hill in the LPDS is a reasonable summary. As the LPDS indicates, since becoming involved in the regeneration of Lodge Hill and, subsequently as owners, Homes England has updated the site evidence base and, based on this, prepared a masterplan which provides for up to 2,000 homes, a new primary school, commercial hub and very significant open space and green infrastructure. The plan is to regenerate this large brownfield site on a comprehensive basis, with the housing development contributing towards the bringing forward of an extensive remediation programme to address significant health and safety concerns associated with the military legacy of unexploded ordnance. In parallel, it is

- also the intention to implement a far reaching biodiversity conservation strategy aimed at minimising and where necessary mitigating and offsetting harm to the Chattenden Woods and Lodge Hill SSSI, restoring degraded and undermanaged habitats to favourable condition and ensuring delivery of an overall net biodiversity gain. This strategy is the result of extensive technical survey work and expert evaluation and, in the view of Homes England, represents the most appropriate means of delivering regeneration of the site, a Government priority. Further details are provided later in this section.
- 7.26 Homes England notes the comments of the Hoo Consortium in paragraphs 3.26 to 3.30 of their representations. The Agency concurs with the views expressed that Lodge Hill is a well located brownfield site, the regeneration of which would complement, and integrate, with the wider proposals for the expansion of Hoo St Werburgh. The reference to the substantial contribution Lodge Hill would make towards meeting the (standard method) OAHN for the Borough (the site at up to 2,000 homes is the largest within the HPRT allocation) is welcomed.
- 7.27 In addition, the Consortium discusses the proposals to include the development of some land designated as a SSSI which is subject to high level protection in national policy (relevant to LPDS Scenario 4 only). Reference is made to the preparation of a robust Biodiversity Conservation Strategy by Homes England to avoid, mitigate and compensate for any harm to the SSSI and ensure that **net gains** are delivered in relation to the wider SSSI network. This is correct, and further details are provided in Section 4 of these representations.
- 7.28 Subject to the resolution of these ecology issues to the Council's satisfaction. The consortium supports the allocation of Lodge Hill as complementary to delivery of the Rural Town.
- 7.29 This support from the Consortium is welcomed; Homes England believes however that the Lodge hill site is integral to the delivery of the HPRT. Whilst Homes England accepts that the wider HPRT proposals may not be physically 'dependent' upon infrastructure or services provided by Lodge Hill, it would be entirely inappropriate for the future spatial planning of the HPRT Local Plan allocation to not include this site. For many years, the brownfield Lodge Hill site has been identified in regional and local development plans as a strategic development opportunity<sup>2</sup>. The extension of the Chattenden Woods and Lodge Hill SSSI (on a site significantly constrained with UXO/Contamination issues) has complicated this picture, but the basic facts remain; namely that regeneration of this site can deliver a significant contribution to local housing needs and, at the same time,

---

<sup>2</sup> Including the Thames Gateway Interim Plan Development Prospectus (2006); The Kent and Medway Structure Plan (2006); The South East Plan (RS) 2009; and 'saved' policies of the Medway Local Plan (2003)

provide long term and sustainable solutions to challenging land remediation and nature conservation issues. Against this background, Homes England believes that there is no alternative but to promote a long term and sustainable solution for Lodge Hill through the emerging Local Plan. This approach will;

(a) Ensure that the Local Plan is 'positively prepared' in relation to the strategic development area;

(b) Establish Lodge Hill as an entirely integrated and complementary development within the wider HPRT proposals; and,

(c) Will ensure that the site's allocation will make a substantial contribution towards HPRT infrastructure funding.

7.30 The latter is a key driver given serious concerns expressed by MC in the LPDS regarding infrastructure funding to deliver the Local Plan strategic allocations, including HPRT.

7.31 It follows that, in the judgement of Homes England, the regeneration proposal for Lodge Hill, should form a key component of the HPRT strategic allocation. Its omission in a form and at a scale, that would be capable of delivering a comprehensive solution, would be detrimental to the orderly and proper planning of the area. For this reason, Homes England intends to promote vigorously its proposals for Lodge Hill as a sustainable development through the emerging Local Plan process.

7.32 Homes England's role is to accelerate development, wherever feasible. Equally, MC is seeking early delivery of housing to help remedy its housing shortfall. In these circumstances, Homes England will be aiming to demonstrate that the proposals for LH will constitute sustainable development as part of its case at the Local Plan examination. Furthermore, it will be seeking a proportion of the housing to be delivered within years 1-10 of the housing trajectory (importantly years 1-5 as well) facilitated by appropriate public funding, if necessary (refer to Appendix 4 Housing Trajectory).

7.33 Homes England looks forward to working in partnership with key statutory consultees, MC and the Hoo Consortium in order to agree and implement these challenging, but exciting proposals, which will provide a positive future for the re-use and regeneration of Lodge Hill.

## **VI. PROPOSED GROWTH IN SUBURBAN LOCATIONS AND IN THE SMALLER PENINSULA VILLAGES**

7.34 It is noted that Policy DS2 indicates that:

"The Council will consider a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and the villages of High

Halstow, Lower Stoke, Allhallows, Grain and Haling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure can the environment can be avoided."

- 7.35 Homes England notes this draft policy text and would invite MC to (a) take a clear view on the availability and deliverability of these sites in line with the new Deliverability Test in the draft NPPF (refer para 68 (a) and (b) and definition of 'deliverable and developable' Annex 2 Glossary) and (b) consider the 'actual' contribution these sites will make to sustainability.
- 7.36 In this regard, as the Consortium representations indicate, the HPRT will make an important 'net gain' to sustainability from a 'social' perspective in terms of the creation of a new enhanced service and employment centre, which will meet the social needs and requirements of rural town residents and of those living in the wider Hoo Peninsula.
- 7.37 Homes England endorses the approach suggested by the Consortium that it will be important that infrastructure across the Peninsula is comprehensively planned to ensure that provision within the core rural town complements provision within the smaller villages and urban extensions. MC is invited to consider this matter and, importantly, require these new development locations to contribute toward the delivery of this wider infrastructure through an appropriate policy mechanism (potential revisions to the S106 pooling arrangements could assist in this direction).

#### SPECIFIC COMMENTS ON THE FOUR DEVELOPMENT SCENARIOS

- 7.38 Drawing upon the analyses of the key differentiating elements above, more detailed comments are provided on the development scenarios below. These comments are concluded with a view from Homes England as to its preferred alternative growth strategy, which reflects the 'optimum' or higher capacity Lodge Hill proposal of up to 2,000 homes.

#### SCENARIO 1: MEETING OBJECTIVELY ASSESSED NEED

- 7.39 Homes England broadly welcomes the strategy in Scenario 1 which, firstly, directs growth to brownfield urban sites, whilst complementing this urban regeneration focus with the proposed development of a rural town and some suburban village expansions. The proportion of growth which is split over half to urban sites/rural town and around one third to village expansion is noted, but will require substantial further testing in relation to:
- The deliverability, availability and viability of the sites identified by the Council in their SLAA having regard to the new 'Housing Delivery Test' in the draft NPPF (para 68).



- The potential to mitigate impacts through appropriate and timely infrastructure provision (information on the strategy for infrastructure delivery is limited in the consultation document).
- The absence of the 'optimum' or higher capacity Lodge Hill development of up to 2,000 homes which would add around 1,500 homes to this scenario as an integral part of the strategic allocation around Hoo St Werburgh.

7.40 Fundamentally, however, Homes England objects to this scenario because it is based upon an Objectively Assessed Need prepared in 2015 of 29,463 homes over the plan period. As discussed earlier in this submission, Government policy is that the Authority should adopt the 'Standard Method' of assessment in its Local Plan preparation (reference letter from the Chief Planner, January 2018). This would mean a housing need of 37,143, some 7,680 higher than that adopted in this scenario (and assuming no additional 'buffer' of up to 20% to address past poor performance in housing delivery).

7.41 It follows that Scenario 1 as it stands, may not be considered 'sound' as it has not been positively prepared or justified and is not consistent (in the absence of further information on 'exceptional circumstances') with national policy.

#### SCENARIO 2: INVESTMENT IN INFRASTRUCTURE TO UNLOCK GROWTH

7.42 It is noted that this scenario would follow the development strategy set out in Scenario 1, but explicitly considers the implication for planning, site capacity and pace of delivery that would result from significant investment in a new passenger rail service and stations and strategic highway improvements.

7.43 Given the close alignment of this scenario to Scenario 1, similar deficiencies regarding the failure to meet Government policy on adoption of the 'Standard Method' and incorporate the 'optimum' Lodge Hill (2,000 homes) proposal remain. The housing deficit would be smaller (6,110 as opposed to 7,680 homes), but Homes England's principal objection still stands.

7.44 Scenario 2, however raises a new issue which is critical to delivery of the Local Plan housing allocations, namely the timely provision of strategic infrastructure. Here, the Council has assumed that funding of infrastructure will be partially achieved through public funding (in particular through an application to the Government under the Housing Infrastructure Fund (HIF)). On the basis that Homes England is currently responsible for evaluating HIF bids, no further comments in this regard are provided.

- 7.45 In general terms however, Homes England is supportive of the Council's initiative to secure Government and other funding to deliver infrastructure to unlock development such as the eastern extension to the HPRT. As indicated earlier, Homes England would urge the Council to guard against the process of technical evaluation and/or funding approval unnecessarily delaying the Local Plan process or subsequent implementation of development. It is evident that the ambitious nature and scale of the rail proposals and eastern expansion to the HPRT will require a large amount of technical work to demonstrate deliverability. The uncertainty associated with this work could be a significant risk to the current Local Plan Programme. If timing does become an issue then, in the interim, the HPRT proposal could proceed with a focus on the 'core' rural town (including Lodge Hill), with necessary highway upgrades and improvements to bus services. This would ensure that the Local Plan could be progressed in accordance with the LDS and not held up by infrastructure delivery constraints.
- 7.46 There is an additional concern that if Scenario 2 were to come forward as envisaged, this would generate a different development typology from the 'small rural town' concept formulated to date. For example, the development locations and different land-uses would be reconfigured around the station and there are questions over whether the higher densities referenced under this scenario would be delivered by the market in this semi-rural location or would be appropriate in land-use planning terms. This will require further evaluation in the light of the proposals for the eastern extension to the Rural Town.
- 7.47 So, in conclusion, although Homes England supports the principle of infrastructure led growth in Medway, it has major reservations in relation to the speed at which such a radical and ambitious rail led project could be delivered, with consequent implications for the current Local Plan programme and hence early delivery of homes. For this, and the above reasons, the agency has concerns that Scenario 2 may not be considered 'sound' as it has not been positively prepared or justified and is not consistent with national policy.

#### SCENARIO 3: MEETING THE GOVERNMENT'S PROPOSED CALCULATION OF HOUSING NEED

- 7.48 This scenario aims to comply with the Government's 'Standard Method' and for this reason is supported in principle by Homes England. It is noted, however, that the housing supply figures (following paragraph 3.51) are still some 1,182 homes short of the calculated figure of 37,143 (assuming no 'buffer' requirement). This deficit could be addressed by including the higher capacity (2000 homes) Lodge Hill site, which again is omitted from this scenario.
- 7.49 Medway clearly has significant worries about how it could plan to deliver this scale of growth over the plan period without exacerbating issues of infrastructure provision and

concerns about environmental capacity. Homes England recognises that delivery of these increased housing numbers will be challenging and would invite the Council to furnish detailed analyses of the likely impacts on infrastructure and environmental capacity to demonstrate the extent of infrastructure provision and environmental mitigation needed not only in relation to impacts from Lodge Hill, but from other landholdings, where indirect pressures would likely affect the Chattenden Woods and Lodge Hill SSSI. The Sustainability Appraisal would be an appropriate vehicle for this analysis (See Section 9).

- 7.50 In terms of Local Plan soundness criteria, of the four options, Scenario 3 is the closest to being considered 'sound', albeit there is a deficit as regards housing delivery numbers in the context of application of the Standard Method, which results in a concern with respect to consistency with national policy.

#### SCENARIO 4: CONSIDERATION OF DEVELOPMENT WITHIN LODGE HILL SSSI

- 7.51 Scenario 4 is the only option in the LPDS which incorporates the higher capacity (up to 2,000) homes allocation at Lodge Hill. Scenario 1, 2 and 3 include a lower capacity proposal (outside of the SSSI) of c. 550 homes but, in the view of Homes England, the latter would not facilitate comprehensive regeneration of the scale needed. In contrast, the higher capacity option on Lodge Hill will meet the Government's key objective, namely the comprehensive regeneration of the Lodge Hill site as part of delivery of the HPRT strategic allocation. Homes England believes that Lodge Hill has the potential to achieve an exemplar scheme of regeneration within the context of providing a high quality environment for the HPRT. In this regard, Homes England notes, and would endorse, the Council's approach in the LPDS which is to include the proposal for development on land designated as a SSSI '*so that a transparent and objective assessment*' of the development impacts can be made as part of the Medway Local Plan consultation process. This will enable the determining issues to be defined and an appropriate balance decided in the light of the available evidence.
- 7.52 The regeneration benefits of the proposed development at Lodge Hill are provided within Section 4 and support the case for allocating up to 2,000 homes on Lodge Hill which include addressing health and safety issues, seeking a solution that delivers a funded outcome, and bringing forward new homes alongside obtaining an overall biodiversity net gain.
- 7.53 The (larger) development at Lodge Hill would replace the need to release greenfield sites at Lower Stoke and south of Shawstead Road in the Capstone Valley. Save for these sites and the enlarged potential development area at Lodge Hill, all other components of land supply in Scenario 4 are the same as outlined in Scenario 1. This means that the

total number of homes would amount to 30,569, still some 6,574 homes short of the 'Standard Method' requirement of 37,143. On this basis, Homes England's comments on Scenario 1 as regards compliance with the tests for soundness, equally apply to Scenario 4.

#### HOMES ENGLAND'S PREFERRED LPDS SCENARIO

- 7.54 Consideration of the above issues has led Homes England to conclude that whilst the broad thrust of the Local Plan Development Strategy is appropriate, the approach taken to determining the scale and distribution of development is not the most sustainable strategy for managing Medway's growth. On this basis, Homes England does not believe that any of the four development scenarios identified in the consultation document can be considered as entirely 'sound'. The agency considers that the Preferred Development Scenario in the draft Local Plan must comprise a 'hybrid' option that takes elements of each of the four scenarios in order to furnish a sustainable and above all, deliverable development strategy. The main components of this proposal are outlined in the response to the last part of Question DS1 below.

#### Question DS1

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

- 7.55 Paragraph 182 of the NPPF sets out the tests to determine Local Plan soundness, and the draft NPPF (para 36) modifies these tests, but taking the current guidance, in summary, they are as follows:
- Positively prepared – Meets objectively assessed development and infrastructure requirements.
  - Justified – the most appropriate strategy when considered against reasonable alternatives.
  - Effective – deliverable and based on joint working.
  - Consistent with national policy – should enable the delivery of sustainable development in accordance with NPPF policies.
- 7.56 Mindful of this advice, Homes England contends that the preferred Local Plan Development Strategy should incorporate the primary components identified below:
- The development strategy should meet the objectively assessed need for housing of 37,143 over the plan period derived from the Standard Method. Any lower figure

should demonstrate 'exceptional circumstances' to justify an alternative approach having regard to infrastructure or environmental capacity concerns.

- The strategy should direct growth to brownfield urban/rural sites (where they would comprise sustainable development) to realise the potential of regeneration (around half of the proposed growth).
- Development of the rural town at Hoo St Werburgh, should incorporate the larger capacity Lodge Hill proposal (up to 2,000 homes), enabling the delivery of a long term and sustainable regeneration solution for this huge and available brownfield site.
- There should be a focus upon securing the delivery of homes in the first 5 year period of the Plan in order to boost local housing supply. The potential contribution from Lodge Hill is highlighted in the Housing Trajectory at Appendix 4.
- The rural town, together with some village expansions, would provide around one – third of the housing land needed, but should contribute funding to wider infrastructure/services provision as appropriate.
- Around 10% of the growth would be allocated to suburban areas such as parts of Capstone Valley and north and east of Rainham, subject to further evaluation of land availability/deliverability issues, mitigation of transport and environmental impacts and appropriate contributions toward infrastructure delivery.
- The growth locations should be largely supported by critical infrastructure and services, primarily funded by the strategic allocations (such as the Hoo Rural Town) and, if appropriate, public investments.
- Further technical works should be undertaken on the potential railway led infrastructure up grade to serve a station at Hoo St Werburgh as a catalyst for additional development in this location. This ambitious proposal should not, however, delay progress of the emerging local plan or the delivery of development to meet Medway's housing needs. If this is the case, then its consideration through an early, partial review of the Local Plan may be necessary.

7.57 The table below outlines the main elements that would make up the land supply in this 'hybrid' scenario:

Component of Land Supply	Number of dwellings
Pipeline sites (completions and permissions)	10,121
Potential allocation capacity on identified sites	23,955
Windfall allowance (17 years)	3,332

Total 37	,408
Standard Method Local housing need	37,143
'Buffer' +	265

7.58 The figures in the above table are based on those in Scenario 3, incorporating the larger capacity (up to 2,000 homes) option at Lodge Hill. This option shows a small surplus in housing numbers. The scale of the 'buffer' will need further evaluation to reflect local factors (e.g. site availability) and the outcome of the application of the Housing Delivery Test criteria set out in the draft NPPF.

7.59 Given the concerns raised with housing delivery of alternative sites (see Section 8) the proposed hybrid option would seem to be Medway Council's best opportunity to get close to this 'Standard Method' figure given the need to ensure a suitable buffer, and that sites are available and deliverable in the plan period.

#### SUMMARY

7.60 Homes England believes that the development scenarios identified by MC have helpfully enabled principal components of the LPDS to be tested and responded to. Having evaluated the scenarios Homes England would make the following recommendations:

- i. The absence of a published 2018 update to the SLAA has hampered an assessment of the alternative site options and the published Local Plan Sustainability Appraisal.
- ii. Homes England contends that the emerging Local Plan should contain policies that encourage the positive re-use of all brownfield sites in Medway for sustainable development or risk these sites remaining unproductive and continuing to deteriorate.
- iii. The Council should accept the Standard Method OAHN and not attempt to justify an alternative approach. Homes England accepts that this may be challenging, but MC should seek to meet as much of the OAHN as practically deliverable and consistent with achieving sustainable development.
- iv. In line with the Hoo Consortiums' comments, it is contended that the plan should be progressed on the assumption that infrastructure improvements necessary to deliver the 'core' HPRT proposals will be funded by the developers/landowners.

- v. The programme for the Local Plan (specifically at the Regulation 19 Stage) should not be delayed either to enable feasibility work on the eastern extension to the Rural Town and/or pending the outcome of the funding bid to Government for, inter alia, strategic rail infrastructure.
- vi. The Lodge Hill site should be an integral part of the core Rural Town, given the priority attached to its comprehensive regeneration and importance to place-making within the strategic development area.
- vii. It will be important that infrastructure across the Peninsula is comprehensively planned to ensure that provision within the 'core' HPRT (including Lodge Hill) complements provision within the smaller villages and urban extensions.
- viii. Homes England has concerns about the soundness of all four of the development scenarios, albeit Scenario 3 is the nearest to be considered 'sound', because it seeks to adopt the 'Standard Method' of calculating Objectively Assessed Housing Need.
- ix. In this context, Homes England has formulated a 'preferred development scenario' which draws upon all four Local Plan scenarios. This includes the Lodge Hill (upto 2,000 homes proposal) which will make a material contribution towards meeting the OAHN.

## 8. RESPONSE TO SECTIONS 4-12 OF THE LPDS – DRAFT POLICY APPROACHES

8.1 The table below provides responses from Homes England to the questions posed on the draft policy approaches.

Response to Medway Regulation 18 Local Plan	Homes England Comment
<b>Section 4. Housing</b>	
<b>Policy H1: Housing Delivery</b>	
Thinking about the Housing section of the Development Strategy, please answer the following question: Question 2 When developing the Local Plan what things do you think the Council should consider to meet Medway's housing needs?	<p>For Homes England comments please refer to the responses to the housing policies below, particularly H1 which, inter alia, raises the following matters:</p> <p>Medway Council should adopt the Government's proposed Standard Method for calculating Housing Need in the context of housing delivery in Medway, to ensure the plan is positively prepared and that sites allocated are both viable and deliverable over the plan period. Maximising the reuse of underused and vacant, publically owned land in sustainable locations and where environmental impacts can be suitably mitigated/compensated.</p> <p>The affordable housing targets should be sufficiently flexible to accommodate the emerging national policy approach (i.e. at least 10%), and should take into account relevant viability guidance. That self/custom housebuilding is encouraged, subject to the scale and pace of house building not being unduly impacted by plots being set aside for self-build which remain unused.</p> <p>Homes England advise Medway Council to consider linkages between the Government's proposed Standard Method of calculating housing need and any consequential impact on the need for additional employment land at emerging Policy E1. Medway Council have a situation where a significant increase in housing need would arguably result in a need for more employment land in Medway. Where additional regeneration sites are identified for housing development (particularly in Scenario 3), it is important to ensure this does not detrimentally impact delivery of employment sites and weaken the potential to deliver employment sites in the three potential employment opportunity areas in Strood, Chatham and Gillingham (See Figure 5.1 page 64 of MLP Regulation 18 consultation).</p>
Question H1 – Housing Delivery H1a Does the proposed policy for housing delivery represent a sound approach? (Yes/No) H1b Please explain why you do / don't think the proposed policy for housing delivery represent a sound approach H1c Would you suggest an alternative approach?	<p>H1a – Homes England is broadly supportive of this emerging policy with comments. Policy H1 as it stands is a statement of intent and will need more detail, including on strategic housing allocations; specific policies will be required for the larger housing allocations including</p> <p>As the Hoo Peninsular Rural Town (HPRT) is in all options - the proposals for Hoo Rural Town (including Lodge Hill) warrants a separate policy.</p> <p>H1b and H1c Medway Council is not currently able to specify the exact housing need requirement that should be adopted in the emerging Medway Local Plan. This is reflected in the four Development Scenarios proposed in Section 3, as three (Scenarios 1, 2 and 4) seek to comply with the Council's (2015) Strategic Housing and Economic Needs Assessment of</p>



Response to Medway Regulation 18 Local Plan	Homes England Comment
	<p>29,463 homes, and only one (Scenario 3) seeks to fulfil the Government's proposed Standard Methodology housing target of 37,143 homes, over the plan period to 2035 (albeit some 1,182 homes short). This is a critical matter for the Medway Local Plan to address, given the need to ensure a sound approach to meeting housing need in Medway is adopted. Homes England recognises local concerns, regarding a further increase in housing numbers arising from the 'standard method', but would encourage the Council to underpin its concerns with specific evidence on infrastructure and environmental impacts.</p> <p>Whilst broadly supportive of the emerging policy, which seeks to determine a "relevant housing need figure dependent on the latest relevant information", Homes England notes that the Government has confirmed its expectations that local planning authorities should apply the Standard Method where emerging Local Plans have not yet been submitted for independent Examination before the revised Framework is published (please refer to letter to all local authorities from the Chief Planner of the Ministry of Housing, Communities &amp; Local Government, dated 30 January 2018). Given the current programme for the Medway Local Plan with Submission of the Plan anticipated in March 2019 (page 5 of Regulation 18 document) this will likely to be the case for Medway Council, and thus the higher figure of 37,143 homes over the plan period to 2035 represents the "latest relevant information", at the point of the publication of the Medway Local Plan Regulation 18 Consultation version (March 2018).</p> <p>Whilst acknowledging this is a significant increase, in the absence of 'exceptional circumstances' being demonstrated (see below) the Standard Method housing target should be adopted in the context of housing delivery in Medway, to ensure the plan is positively prepared and that it complies with Government policy.</p> <p>Homes England notes that Paragraph 61 of the Draft NPPF (March 2018) states that 'exceptional circumstances' are required to 'justify an alternative approach' to the Standard Method. In establishing this figure, any [unmet housing] needs that cannot be met within neighbouring areas, (i.e. in adjoining authorities such as Gravesham), should also be taken into account.</p> <p>As indicated the Council will need to provide robust evidence which demonstrates why the Standard Method housing target cannot be accommodated. Demonstrating 'exceptional circumstances' is a high bar is clear and this is reflected in paragraph 11b which requires any adverse impact as to 'significantly and demonstrably outweigh the benefits'.</p> <p>Please refer to Homes England's comments in section 4 (Para 4.10 – 4.19) of this report which corresponds with this response.</p> <p>Whilst it is recognised that there will be infrastructure and environmental capacity constraints to growth, these issues will need to be very clearly articulated together with proposals for mitigation, if the argument against use of the Standard Method is to be found sound. It is important that such evidence is published promptly to allow this to be tested by objectors.</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
	<p>Homes England's additional comments:</p> <p>The emerging policy states that "Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period." Homes England agrees that specific site allocations should be determined, but queries the establishment of "broad locations for development" when the plan should seek to allocate specific sites to deliver housing. Homes England seek clarity on the purpose of identifying 'broad locations for housing development' and would wish to see substantially more information on the proposed sites that make up the assumed land supply.</p> <p>Homes England acknowledges the emerging policy support for "Development of a strategic allocation for a rural town on the Hoo Peninsula will be in accordance with the Council's development framework for Hoo." Homes England is working closely with the Hoo Consortium members and supports the development of a Hoo Rural Town incorporating Lodge Hill as a integral component of this new sustainable development. The proposed Hoo Rural Town has the potential to provide significant contribution to meet Medway's housing needs with Lodge Hill responsible for the largest contribution within the allocation of up to 2,000 homes.</p>
Policy H2: Housing Mix	
<p>Question H2:</p> <p>H2a Does the proposed policy for housing mix represent a sound approach? (Yes/No)</p> <p>H2b Please explain why you do / don't think the proposed policy for housing mix represent a sound approach.</p> <p>H2c Would you suggest an alternative approach?</p>	<p>H2a – Homes England supports, in principle, this policy approach relating to housing mix.</p> <p>H2b – The recognition at Paragraph 4.8 that not all sites will be able to accommodate the "full range of [housing] types needed" highlights the importance of (appropriately phased) larger sites coming forward which have a greater opportunity to "encourage a sustainable mix of market housing to address local requirements". Given the potential development quantum at Lodge Hill and Greater Hoo, this presents an opportunity to provide "a variety of housing types and sizes... to achieve balanced and sustainable communities." Homes England considers that this approach is consistent with NPPF para 50 which seeks delivery of "a wide choice of high quality homes... and [to] create sustainable, inclusive and mixed communities."</p> <p>Due to the large scale of development proposed at Lodge Hill and the wider Hoo Rural Town, there is an opportunity to provide a wide range of site sizes, housing types and mix of tenures, which will meet the wider social and demographic needs of the local communities at Chattenden and Hoo.</p>
Policy H3: Affordable Housing	
<p>Question H3:</p> <p>H3a Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision? (Agree/Disagree)</p> <p>H3b Please explain why you agree / disagree with threshold for contributions for affordable housing and the percentage requirements for its provision.</p> <p>H3c What do you consider would represent an effective</p>	<p>H3a – Homes England support with comments.</p> <p>H3b</p> <p>Homes England is supportive of the policy approach to affordable housing, however recommends that emerging policy H3 is amended to acknowledge that affordable housing provision should be considered on a site-by-site basis. A variable percentage requirement for affordable housing in the "urban and rural" areas fails to recognise that other factors may impact upon the ability of a site to meet or exceed the proposed requirement, for example the Draft NPPF (Paragraph 34) states that affordable housing should be set having regard to viability and infrastructure contributions. This is particularly important for previously developed sites which could be in urban and rural locations. Lodge Hill is</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
alternative approach?	<p>a case in point. It is a rural brownfield site with the need for substantial clean-up to address clearance of contamination and unexploded ordnance. It is suggested that if a variable proportion of affordable housing is to be adopted then this should fall between 'greenfield' and 'brownfield' sites to reflect differences in development viability between these categories of site.</p> <p>In addition, Paragraph 65 of the Draft NPPF also states that where major housing development is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.</p> <p>Whilst Homes England supports the principle of an affordable housing target for developments over 15 units for up to 30%, the policy should be sufficiently flexible to accommodate the emerging national policy approach (i.e. at least 10%) as referenced above, and should take into account relevant viability guidance (NPPG Paragraph: 019 Reference ID: 10-019-20140306).</p> <p>H1c Homes England suggests that the policy should acknowledge the need to consider affordable housing on a site-by-site basis and that provision should take into account viability, and potential for the application of the Vacant Building Credit (VBC) in appropriate circumstances. This will provide a degree of flexibility supported by the spirit of the emerging policy requirements when considering the level of affordable housing provision.</p> <p>Emerging NPPF paragraph 65 highlights certain cases where exemptions should apply to provision of affordable housing which includes (criterion b and c) "specialist accommodation for a group of people with specific needs or... [development] by people who wish to build or commission their own homes". The draft policy should acknowledge that certain housing types will be exempt from the proposed affordable housing provision requirement in the circumstances highlighted by national policy.</p> <p>As indicated the emerging policy proposes different affordable housing contributions for the urban and rural areas, but it does not clearly define these areas. If the Council intends to continue with this approach, Homes England suggests a map is provided to define the urban and rural areas to ensure the policy can be correctly interpreted. This could be linked to the ALC plan on page 67 which identifies urban areas in Medway.</p> <p>Typographical error: Final paragraph of emerging policy H3: "Where affordable housing is to be provided offsite, the council's preferred position is for developers to directly provide affordable dwellings on an alternative site"</p>
Question H4: What do you consider would represent an effective split of tenures between affordable rent and intermediate in	Homes England seeks a flexible approach to be adopted by Medway Council on affordable housing tenure mix. The current mix sought by the council of 60% affordable rent and 40% intermediate affordable housing (including shared ownership) will be reviewed following a greater demand for affordable rent. Homes England reserves the right to

Response to Medway Regulation 18 Local Plan	Homes England Comment
delivering affordable housing?	comment on the proposed revised affordable housing tenure mix.
Policy H4: Supported Housing, Nursing Homes and Older Persons Accommodation	
<p>Question H5:</p> <p>H5a Do you agree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation? (Agree/Disagree)</p> <p>H5b Please explain why you agree or disagree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation.</p>	<p>Refer to the response to H2 'housing mix' above, particularly in relation to this type of housing provision being 'exempt' from affordable housing provision, in line with emerging NPPF paragraph 65 b). Homes England notes that that emerging proposals at Lodge Hill include provision for an assisted living facility, as part of an approach aimed at creating a choice of accommodation within a new sustainable community at Lodge Hill and the wider Hoo Rural Town.</p>
<p>Question H6:</p> <p>H6a Do you consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs? (Yes/No)</p> <p>H6b Please explain why you do / don't consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs</p>	<p>No Homes England comment.</p>
<p>Question H7:</p> <p>H7a Do you consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme? (Yes/No)</p> <p>H7b Please explain why you do / don't consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme</p>	<p>H7a - Homes England supports in principle large developments containing a wide choice of housing (including provision for specialist and supported housing) but this should not be prescriptive; flexibility is needed.</p> <p>H7b – Flexibility is required to reflect factors including scheme viability; different locations (i.e. some sites with lower access to public transport may be unsuitable for such specialist housing) and commercial market demand.</p>
Policy H5: Student Accommodation	
<p>Question H8:</p> <p>Do you agree with the proposed policy for student accommodation? Would you</p>	<p>No Homes England comment.</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
propose an alternative approach?	
<b>Policy H6: Mobile Home Parks</b>	
Question H9: Do you agree with the proposed policy for mobile home parks? Would you propose an alternative approach?	No Homes England comment.
<b>Policy H7: Houseboats</b>	
Question H10: Do you agree with the proposed policy for houseboats? Would you propose an alternative approach?	No Homes England comment.
<b>Policy H8: Houses of multiple occupation</b>	
Question H11: Do you agree with the policy approach for HMOs?	No Homes England comment.
Question H12: Do you consider that the council should set locational criteria for HMOs, such as consideration neighbouring uses and proximity to other HMOs?	No Homes England comment.
Question H13: Should the council make use of Article 4 Directions to restrict the ability to convert properties to HMOs?	No Homes England comment.
<b>Policy H9: Self-build and Custom Housebuilding</b>	
Question H14: H14a Do you agree with the self-build and custom housebuilding approaches taken above? (Agree/Disagree) H14b Please explain why you agree or disagree with the self-build and custom housebuilding approaches taken above	<p>Homes England strongly agrees and supports the policy for self-build plots, in line with the NPPF (para 159) to address the need for all types of housing. It is noted that Medway Council set up its register in April 2016. Whilst anticipated demand has been calculated over the plan period at c.600 plots (para 1.53), this should be monitored via the Council's register to ensure that the wider scale and pace of house building in Medway is not unduly impacted by plots being set aside for self-build which remain unused.</p> <p>In addition, it is noted from the emerging draft NPPF para 65 c) that self-build should be exempt from affordable housing provision.</p>
Question H15: H15a Do you think that the	Please refer to Homes England response to H14 above. Homes England has no, in principle, objection to the allocation of specific sites for

Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>council should allocate specific sites for self/custom housebuilding development? (Yes/No)</p> <p>If so, do you have any sites suitable for this use that you wish to promote for us to consider?</p> <p>H15b Please explain why you agree or disagree that the council should allocate specific sites for self/custom housebuilding development</p>	<p>self/custom housebuilding subject to the scale and pace of house building not being unduly impacted by plots being set aside for self-build which remain unused.</p>
<p>Question H16:</p> <p>H16a Do you agree with the approach set above? (Yes/No)</p> <p>H16b Please explain why you agree or disagree with the approach set above</p> <p>H16c? If yes, what proportion of the allocated site do you agree is an acceptable percentage to be sold and built out before the remaining plots could be offered to the council/housing association or other non self/custom builders?</p> <p>H16d After what further period of time of unsuccessful marketing do you feel it would be acceptable to offer the remaining plots on to the council/housing association or other non self/custom builders?</p>	<p>H16a and b – Homes England agree that offering unused/untaken self/custom build plots to the open market would be acceptable following a fair period of marketing.</p> <p>H16c – Homes England considers that flexibility should be incorporated into any policy in relation to acceptable percentage to be sold, as it will depend on take up of self/custom-build plots as yet unknown.</p> <p>H16d – Homes England considers that a period of 6-12 months marketing, would be sufficient to justify offering the plot(s) to the council/housing association, before being allowed to build out on the plot themselves or sell to a non self/custom builder /developer.</p>
<p>Question H17:</p> <p>H17a Do you agree that sites over a certain size should offer a percentage of the plots to self/custom builders? (Yes/No)</p> <p>If yes, do you agree with the proposed 5% share of plots for self/custom build and the threshold of sites at 400 dwellings and over?</p> <p>H17b Please explain why you agree or disagree that sites over a certain size should offer a percentage of the plots to self/custom builders</p>	<p>H17a and b – Whilst Homes England agrees with the principle of allowing self/custom-build plots, Homes England disagrees with a requirement that sites should give a specific 5% share of plots for self/custom build and the adoption of a 400 and over dwellings threshold, unless provision can be included within 'affordable housing' provision. Homes England consider that there should be greater flexibility incorporated in this policy as it has potential to slow down the rate of housing coming forward in Medway, an area that desperately requires to speed up the pace and scale of housing delivery to meet its growth targets.</p>
<p>Question H18:</p> <p>H18a Following on from the question above, if a plot has been marketed (to the satisfaction of the council) for</p>	<p>H18a and b – Homes England considers that a period of 6-12 months marketing would be sufficient to justify offering the plot(s) to the council/housing association, before being allowed to build out on the plot themselves or sell to a non self/custom builder /developer. A shorter period of time would reduce the potential for any potential delay to</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>12 months and not sold, we propose that it can then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market. Do you agree with this approach outlined above? (Yes/No)</p> <p>H18b Please explain why you agree or disagree with this approach</p>	<p>housing delivery in Medway.</p>
<p>Question H19:</p> <p>H19a With regards to these large sites of 400 dwellings or over, in order to prevent the completion of the overall site from being drawn out, exposing existing residents to extended periods of construction by their neighbours, we propose that if a plot is purchased by a self or custom builder, the dwelling must be built within 3 years of the date of sale, before being offered to other applicants on the self- build register to purchase. If there is no interest, then it may then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market. The onus would be on the developer to advise the council when each plot had been sold in order to monitor the development. Do you agree with this approach outlined above? (Yes/No)</p> <p>H19b Please explain why you agree or disagree with this approach</p>	<p>H19a and b – Homes England agrees with the proposed approach.</p>
<p>Policy H10: Gypsy, Traveller and Travelling Showpersons</p>	
<p>Question H20:</p>	<p>No Homes England comment.</p>



Response to Medway Regulation 18 Local Plan	Homes England Comment
Does this represent a sound approach to planning for gypsy, traveller and travelling showpeople's accommodation needs?	
Question H21: Do you consider that the council should identify site allocations for new gypsy and traveller, and travelling showpeople in the Local Plan?	No Homes England comment.
Section 5. Employment	
Q5 When developing the Local Plan what things do you think the council should consider to meet Medway's economic needs?	Please refer below to Questions E1 to E5 for Homes England's comments on emerging Employment policies.
Policy E1: Economic Development	
Question E1: E1a Do you consider that this is an effective approach to securing and strengthening Medway's economy? (Yes/No) E1b Please explain why you think that this is / is not an effective approach to securing and strengthening Medway's economy	<p>Homes England recommend that the employment land needs should be reviewed in light of the potential increases of housing provision under the Standard Method for calculating housing need, which indicates an increase of 7,680 homes. It is imperative for Medway Council to consider any consequential impact of this increase on employment land needs. Where additional regeneration sites are identified for housing development (particularly in Scenario 3), this likely to impact delivery of employment sites and weaken the potential to deliver employment sites in the three potential employment opportunity areas in Strood, Chatham and Gillingham (See Figure 5.1, page 64, of MLP Regulation 18 consultation). Any increase in housing numbers will need to be reflected in appropriate provision of employment land.</p> <p>It is suggested that more detail on the Employment Opportunity Areas (Figure 5.1) will be required in a policy, with more detail on the location of these areas and the mix and quantum of development anticipated in the plan period and beyond.</p>
Question E2: Which locations do you consider are the most appropriate for employment growth?	<p>Homes England notes that "secure sustainable employment uses are identified for the strategic sites at Grain and Kingsnorth." It is noted that the proposed Hoo Rural Town, including development at Lodge Hill, is located close to these two large employment expansion areas. In this context, it is important to generate more sustainable patterns of commuting which will avoid the need to travel by private car in Medway. It is important that housing is located close to employment growth, as highlighted in para 55 of the NPPF, which should include employment meeting local needs where appropriate.</p> <p>The Hoo Rural Town and the Lodge Hill site, in particular, will include a mixed use hub containing some employment land which will make a contribution towards Medway's employment needs, whilst also making the proposed development more sustainable.</p>
Question E3: E3a Do you agree with the proposed approach to	No Homes England comment.



Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>assessing GVA with planning applications for employment uses? (Yes/No)</p> <p>E3b Please explain why you agree or disagree with the proposed approach to assessing GVA with planning applications for employment uses</p>	
<p>Question E4:</p> <p>E4a Do you support the proposed approach for higher value jobs in Medway? (Yes/No)</p> <p>E4b Please explain why you support / do not support the proposed approach for higher value jobs in Medway</p>	No Homes England comment.
<p>Question E5:</p> <p>E5a Do you consider that there is demand for further serviced office accommodation in Medway? (Yes/No)</p> <p>E5b Please explain why you consider / do not consider that there is demand for further serviced office accommodation in Medway</p>	No Homes England comment.
<b>Policy E2: Rural Economy</b>	
<p>Question E6:</p> <p>E6a Do you agree with the proposed policy approach for the rural economy? (Yes/No)</p> <p>E6b Please explain why you agree / disagree with the proposed policy approach for the rural economy</p> <p>E6c What alternative approaches would you propose?</p>	No Homes England comment.
<b>Policy E3: Tourism</b>	
<p>Question E7:</p> <p>E7a Do you agree with the proposed policy approach towards tourism? (Yes/No)</p> <p>E7b Please explain why you agree or disagree with the proposed policy approach towards tourism</p> <p>E7c Would you suggest an alternative policy approach?</p>	No Homes England comment.
<b>Policy E4: Visitor accommodation</b>	
Question E8:	No Homes England comment.

Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>E8a Do you agree with the proposed policy approach towards tourism? (Yes/No)</p> <p>E8b Please explain why you agree or disagree with the proposed policy approach for visitor accommodation</p> <p>E8c Would you suggest an alternative policy approach?</p>	
Section 6. Retail and Town Centres	
Q8 When developing the Local Plan what things do you think the council should consider to meet Medway's retail and town centre needs?	For Homes England comments please refer to Retail and Town Centre policies below.
Policy RTC1: Retail hierarchy	
<p>Question RTC1:</p> <p>RTC1a Do you consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway? (Yes/No)</p> <p>RTC1b Please explain why you consider / don't consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway</p>	<p>RTC1a – RTC1b. The approach set out within RTC1 is supported in principle by Homes England. Recognition of the need to introduce additional retail provision in Hoo St Werburgh rural town in order to serve the needs of the existing and population in this area is justified; this will be required in order to meet future quantitative need in this area whilst also remedying existing qualitative deficiencies which are evident from the shopping patterns recorded by the North Kent SHENA - Retail and Commercial Leisure Assessment 2016. It is important that the wording within RTC1 III remains sufficiently flexible so as to ensure that retail requirements can be planned relative to the scale of development which will be realised in this area. This should recognise the ability of development at Lodge Hill to provide retail facilities of an appropriate scale, in order to meet the day-to-day needs of residents, in addition to other facilities in the wider rural town area. It is recommended that a plural form of wording be incorporated for the purpose of RTC1 III, thereby enabling retail requirements to be delivered across more than one site / local centre if required. The scale of convenience and comparison retail floorspace provided as part of any planned development at Lodge Hill and/or within the Hoo Wider Rural Town will be proportionate, so as to avoid jeopardising the wider retail hierarchy.</p>
<p>Question RTC2:</p> <p>RTC2a Do you agree with the definition of Chatham as the primary centre at the top of the hierarchy? (Agree/Disagree)</p> <p>RTC2b Please explain why you agree or disagree with the definition of Chatham as the primary centre at the top of the hierarchy</p>	<p>RTC2a – RTC2b. It is agreed that Chatham be defined as the primary centre within the retail hierarchy. This is borne out by the shopping patterns identified by the Retail and Commercial Leisure Assessment 2016, which demonstrate the significant role and function of Chatham town centre as a comparison goods shopping destination. This will remain the position in planning for appropriate, smaller-scale retail provision at Lodge Hill and the Hoo Wider Rural Town, whose delivery will ensure that residents' day-to-day needs are met without giving rise to significant adverse impacts on Chatham town centre or indeed any other defined centre within the retail hierarchy.</p>
<p>Question RTC3:</p> <p>RTC3a Do you agree with the identified district centres? (Agree/Disagree)</p> <p>RTC3b Please explain why you agree or disagree with the identified district centres</p>	<p>RTC3a – RTC3b. Homes England agree that the identified district centres within the retail hierarchy are appropriate and would not be subject to any significant adverse impacts as a result of proportionate retail facilities being delivered as part of development at Lodge Hill and Hoo Wider Rural Town.</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
Question RTC4: How do you consider that Dockside should be recognised in Medway's retail hierarchy?	No Homes England comment.
Question RTC5: Would you propose any alternative approaches to Medway's retail hierarchy?	Whilst Homes England do not propose an alternative approach to the retail hierarchy, comments made in respect of Policy RTC1 III, namely the need for recognition that retail requirements emerging at Lodge Hill and the Hoo Wider Rural Town could be delivered through more than one local centre, should be reflected in the policy wording.
Policy RTC2: Sequential Assessment	
Question RTC6: RTC6a Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres? (Yes/No) RTC6b Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres RTC6c Do you agree with the proposed sequential approach? Would you propose alternative approaches? (Yes/No) RTC6d Please explain why you agree or disagree with the proposed sequential approach RTC6e Would you propose alternative approaches?	<p>RTC6a – RTC6b. The application of the sequential test prescribed by draft Policy RTC2 accords with the approach set out in paragraph 24 of the NPPF and is also consistent with paragraph 87 of the draft NPPF (March 2018).</p> <p>RTC6c – RTC6e. Notwithstanding the above, the creation of new local centres to support sustainable growth at Lodge Hill and the wider Hoo St Werburgh rural town should be expressly recognised within the policy wording. It is recommended that Policy RTC2(IV) is amended to this effect:</p> <p>"...Local centre or edge of centre, including any planned local centre, whichever is better connected and able to support 1, 2 or 3 listed above."</p> <p>The proposed amendment ensures that there is a robust plan-led approach to accommodating new retail and associated town centre uses within planned areas of growth, which are proportionate in scale so as to protect the wider retail hierarchy.</p>
Policy RP3: Impact Assessments	
Question RTC7: RTC7a Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres? (Yes/No) RTC7b Please explain why you consider / don't consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres	RTC7a – RTC7b. The application of the impact test prescribed by draft Policy RP3 accords with the approach set out in paragraph 26 of the NPPF and is also consistent with paragraph 90 of the draft NPPF (March 2018). The proposed floorspace threshold of 2,500 sq m for testing the impact of town centre uses which would not be located within a defined centre is considered appropriate and justified against the findings of the North Kent SHENA - Retail and Commercial Leisure Assessment 2016.
Question RTC8: RTC8a Do you agree with the proposed approach to impact	RTC8a – RTC8b. The approach is considered robust for the reasons set out in response to RTC7a – RTC7b.

Response to Medway Regulation 18 Local Plan	Homes England Comment
assessments? (Yes/No) RTC8b Please explain why you agree or disagree with the proposed approach to impact assessments	
Question RTC9: RTC9a What do you consider would represent an appropriate size threshold for developments to undertake an impact assessment? RTC9b Would you propose alternative approaches?	RTC9a – RTC9b. The proposed threshold accords with the default position prescribed through the NPPF and draft NPPF; and is robustly evidenced through the findings and recommendations provided by the North Kent SHENA – Retail and Commercial Leisure Assessment 2016. This will enable an appropriate degree of flexibility to be applied in planning for suitable retail facilities to support growth at Lodge Hill and the wider Hoo St Werburgh rural town; namely ensuring that convenience retail provision will be of a sufficient size to meet residents' day-to-day needs and therefore reduce the dependency on unsustainable car-based travel to other stores and facilities within the wider area.
Policy RTC4: Frontages	
Policy RTC5: Role, Function and management of uses in centres – Frontage	
Question RTC10: Do you agree that this proposed approach represents an effective approach to planning for the city and district centres in Medway?	No Homes England comment.
Question RTC11: Do you consider that changes are required to the town centre boundaries as defined in the figures 5a to 5f above?	No Homes England comment.
Question RTC12: Do you agree with the classification of primary and secondary shopping frontages as shown in figures 5a to 5f above?	No Homes England comment.
Question RTC13: Do you consider that there are alternative approaches to manage this aspect of Medway's main centres?	No Homes England comment.
Policy RTC6: Temporary uses	
Question RTC14: Do you agree that this proposed approach represents an effective approach to planning for temporary uses in centres in Medway? Would you propose alternative approaches?	No Homes England comment.

Response to Medway Regulation 18 Local Plan	Homes England Comment
<b>RTC7: Supporting Sustainable and Healthy centres</b>	
Question RTC15: Do you agree that development of specific uses should be restricted where it could result in an unhealthy and unsustainable overconcentration of premises in one area?	No Homes England comment.
Question RTC16: The council considers such specific uses to include 'high energy density food' outlets, which sell foods high in fat and/or sugar; betting shops; gaming centres; and premises selling alcohol, particularly for off licence sales. Do you agree with this definition? Do you think that the list should be amended?	No Homes England comment.
Question RTC17: Do you think that the council should introduce a maximum percentage for units in an area that are allowed for use by the specific businesses noted above?	No Homes England comment.
Question RTC18: Do you think that such uses should be restricted near schools and youth facilities?	No Homes England comment.
Question RTC19: Do you think that the council should not set policy in this area, but rather consider proposals for such uses on a case by case basis?	No Homes England comment.
<b>RTC8: Hempstead Valley District Centre</b>	
Question RTC20: Do you consider this is the appropriate approach to planning for Hempstead Valley shopping centre?	No Homes England comment.
Question RTC21: Do you think that further	No Homes England comment.

Response to Medway Regulation 18 Local Plan	Homes England Comment
developments at Hempstead Valley should be restricted, so that greater priority is given to retail and leisure in the main town centres in Medway?	
<p>Question RTC22:</p> <p>RTC22a Do you support a policy approach that seeks to achieve a balance of uses across all centres in Medway? (Yes/No)</p> <p>RTC22b Please explain why you support / don't support a policy approach that seeks to achieve a balance of uses across all centres in Medway</p>	No Homes England comment.
<p>Question RTC23:</p> <p>Do you support a policy approach that recognises the family leisure role of Dockside?</p>	No Homes England comment.
<p>Question RTC24:</p> <p>RTC24 What do you think is the appropriate approach to further growth? Should policy only allow a small amount of new 'convenience' retail, or support a wider range of services and shops to develop its role as a local centre?</p>	No Homes England comment.
<p>Question RTC25:</p> <p>Do you consider that this is an appropriate approach to planning for Medway Valley Leisure Park?</p>	No Homes England comment.
<p>Question RTC26:</p> <p>Do you think that there should be a specific policy to manage the development of Medway Valley Leisure Park, or if proposals should only be determined by use of wider retail policies?</p>	No Homes England comment.
<p>Policy RTC10: Healthy sustainable communities</p>	
<p>Question RTC27:</p> <p>RTC27a Do you agree with this proposed approach to sustainable communities? (Agree/Disagree)</p> <p>RTC27b Please explain why</p>	<p>RTC27a – RTC27b. Homes England are supportive of the proposed approach to sustainable communities, namely provision of a range of services and facilities in accessible locations to meet residents' day to day needs. To ensure the longer-term sustainability of defined centres, in particular the local centres that would support strategic growth at Lodge Hill and the Hoo St Werburgh rural town, it is imperative that a</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>you agree or disagree with this proposed approach to sustainable communities</p> <p>RTC27c What alternative approaches would you suggest?</p>	<p>sufficient degree of interchangeability is permitted to allow uses to change and evolve so as to respond to market requirements. Supporting the diversification and changes of use within defined centres is a key facet of the approach towards achieving vital and viable town centres which is set out in paragraph 86(g) of the draft NPPF. It is recommended that this position is reflected within the wording of draft Policy RTC10.</p>
<p>RTC11: Local Centres and shopping parades</p>	
<p>Question RTC28:</p> <p>RTC28a Do you consider that this is the appropriate approach to planning for small retail areas? (Yes/No)</p> <p>RTC28b Please explain why you consider / don't consider that this is the appropriate approach to planning for small retail areas</p> <p>RTC28c Do you think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis? (Yes/No)</p> <p>RTC28d Please explain why you think / don't think that it would be better if there were no specific policy for local centres and shopping parades, and development proposals were considered on a case by case basis</p>	<p>RTC28a – RTC28b. Whilst Homes England are supportive in principle of the uses identified for the core function of local centres, reference within the wording of draft Policy RTC11 to convenience retail needs to be expanded to capture main-food shopping requirements potentially arising. This will be especially pertinent in the proposed areas of growth at Lodge Hill and the Hoo St Werburgh rural town, where it will be necessary for ensure that residents' residents are served by food shopping provision which is of a sufficient scale to meet their day-to-day needs, whilst ensuring that the hierarchy of defined centres within the Borough is maintained.</p> <p>RTC28c – RTC28d. The retention of draft Policy RTC11 is supported, subject to the aforesaid amendment; and that a greater degree of flexibility is inscribed in the policy wording so as to ensure that uses can be interchangeable without being subject to onerous constraints. In terms of planned new local centres to support growth at Lodge Hill and Hoo St Werburgh rural town, such flexibility may be enabled through an appropriate condition of the planning permission.</p>
<p>Policy RTC12: Retail Parks</p>	
<p>Question RTC29:</p> <p>Do you consider that this is a effective approach to planning for retail parks?</p> <p>Would you suggest alternative policies for planning of development in retail parks?</p>	<p>No Homes England comment.</p>
<p>Section 7. Natural Environment and the Green Belt</p>	
<p>Q11 When developing the Local Plan what things do you think the council should consider to support conservation and enhancement of the environment in Medway?</p>	<p>For Homes England comments please refer to the responses to the Natural Environment and Green Belt policies below.</p>
<p>Policy NE 1: Sites of international importance for nature conservation</p>	



Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>Question NE1: NE1a Do you consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats? (Yes/No) NE1b Please explain why you consider / don't consider that this is an effective approach to managing the internationally important habitats in the designated SPA and SAC habitats NE1c What alternative approaches would you recommend to secure the favourable condition of these areas?</p>	<p>Homes England has in principle support for the policy. The policy is based on an effective strategic approach which has involved several North Kent Authorities as well as numerous statutory and non-statutory agencies and consultees, which has required critical evaluation and an extensive evidence base to effectively address urbanisation and recreational pressures on European sites within North Kent.</p> <p>The proposed development at Lodge Hill would be compliant with this policy in relation to SAMMS contributions and will incorporate sufficient greenspace provision (including bespoke mitigation in the form of on-site dog-walking provision within and around the Site) and delivers an access management strategy to help offset recreational pressures on SPA/Ramsar sites. It is noted that the potential for adverse effects upon SAC sites (both alone and in combination) in relation to development at Lodge Hill will be based on a screening assessment of air quality data and given the distance from the site (c.1.1 km), it is likely that this impact pathway will be screened out.</p>
Policy NE2: Conservation and Enhancement of the Natural Environment	
<p>Question NE2: NE2a Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment? (Yes/No) NE2b Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing Medway's natural environment NE2c What alternative approaches would you recommend to secure the favourable condition of these areas?</p>	<p>Homes England generally supports the thrust of this draft policy, but for the reasons outlined earlier in this submission (notably the response to questions DS1a,b and c), would encourage the council to ensure that this policy is sufficiently flexible to accommodate sites such as Lodge Hill to ensure greater consistency with national policy.</p> <p>Homes England therefore objects to the wording of the policy as proposed and suggest the following amendments:</p> <p>"The council recognises the hierarchy of sites designated for their importance for nature conservation. In addition to the sites of international importance set out in Policy NE1, Medway includes Sites of Special Scientific Interest (SSSI), Local Nature Reserves, Local Wildlife Sites and a Marine Conservation Zone. The council will promote nature conservation by pursuing opportunities to improve the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas biodiversity sites through the adoption of avoidance, mitigation and compensation measures (as outlined in the NPPF) and also by pursuing opportunities to strengthen biodiversity networks. In this context development in or adjacent to an SSSI will need to demonstrate that it constitutes sustainable development and can show that demonstrable net environmental gains can be achieved and the SSSI network can be strengthened."</p> <p>The proposed changes to this policy remove the term 'restricting development' which could potentially result in an outcome that undermines Medway's objective to: Meet its objectively assessed need target; and, The ability to follow "an exception... [which] should only be made where the benefits of the development, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of</p>



Response to Medway Regulation 18 Local Plan	Homes England Comment
	<p>special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest" (see NPPF para 118).</p> <p>Homes England would refer the reader to Section 4 of this submission where, the approach at Lodge Hill is outlined with reference to national policy and the comprehensive nature conservation strategy and mitigation and compensation package (at Appendix 3). This addresses in terms, the potential impacts on the three main features of the SSSI designation namely, nightingale, ancient woodland and MG5 grassland.</p> <p>Homes England is therefore seeking to minimise as far as practicable impacts upon the Chattenden Woods and Lodge Hill SSSI. The bespoke approach to assessing the impacts of development on the lodge Hill SSSI has wider application and could be used in appraising the cumulative impacts of the Hoo Rural Town proposals on the SSSI in the context of the Local Plan programme. This method would ensure greater consistency in the appraisal process and has the broad support of Natural England. Further details are provided in Appendix 3 to this submission.</p> <p>Homes England's approach at Lodge Hill provides a unique opportunity to both comprehensively regenerate the site and provide benefits at a county/regional/national scale to enhance biodiversity through the delivery of an off-site compensation strategy (and the delivery of a package of sites and potential strengthening of the SSSI network).</p>
Policy NE3: Kent Downs Area of Outstanding Natural Beauty	
<p>Question NE3:</p> <p>NE3a Do you consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB? (Yes/No)</p> <p>NE3b Please explain why you consider / don't consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB</p> <p>NE3c What alternative approaches would you recommend to secure the components of natural beauty?</p>	<p>Homes England has in principle support for the proposed policy.</p> <p>Homes England notes that the Lodge Hill Site is located over 5km NE from the Kent Downs AONB at its nearest point. This north-eastern boundary of the Kent Downs AONB follows the M2 motorway. Views in the direction of Lodge Hill site are likely to be screened by multiple layers of tree cover and undulation in terrain, including Great Chattenden Wood and Round Top Hill, located directly to the west of the proposed development site. Draft Zone of Theoretical Visibility models have shown no intervisibility between the proposed development and the Kent Downs AONB, hence it is considered unlikely that the proposed development would have any likely visual influence on the AONB or its setting.</p>
Policy NE4: Landscape	
<p>Question NE4:</p> <p>NE4a Do you consider that this is an effective approach to landscape policy in Medway?</p> <p>NE4b Please explain why you consider / don't consider that this is an effective approach to landscape policy in Medway</p> <p>NE4c What alternative approaches would you</p>	<p>Homes England has in principle support for the proposed policy and is a continuation of existing policy and good practice in the industry.</p> <p>Homes England agree that in principle the submission and adoption of an updated Landscape Character Assessment and Green Infrastructure framework will provide a basis for determining acceptability of development proposals as assessed in detail in an LVIA prepared in accordance with GLVIA3.</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
recommend?	
Policy NE5: Securing strong Green Infrastructure	
<p>Question NE5:</p> <p>NE5a Do you consider that this is an effective approach to securing effective and healthy green infrastructure in Medway?</p> <p>NE5b Please explain why you consider / don't consider that this is an effective approach to securing effective and healthy green infrastructure in Medway</p> <p>NE5c What alternative approaches would you recommend to secure effective and healthy green infrastructure in Medway?</p>	<p>Homes England supports in principle the proposed policy.</p> <p>Homes England would like to see the terminology used clearly defined in the Green Infrastructure Framework (open space assets; landscape buffers; green infrastructure zones; and Local Green Spaces), in order that developers can ensure their compliance with the Policy NE5 as part of the masterplanning process, and set out their GI strategy and how the development complies with Policy NE5 as part of the Design and Access Statement.</p> <p>In principle the adoption of an updated Landscape Character Assessment and Green Infrastructure Framework will provide a sound basis for determining the acceptability of development proposals, however without these documents available to review it is difficult to discuss their potential effectiveness. It is hoped that the Landscape Character Assessment and Green Infrastructure guidance can illustrate future aspirations clearly enough to be instructive for developers in their masterplanning process, and that these requirements will be considered in the planning consent process.</p> <p>A major challenge to the landscape of Medway comes from urbanisation of the countryside through piecemeal development of proposals, including the large scale housing proposals associated with the Hoo Consortium, and other developments. If meaningful enhancement of landscapes (as defined by the Landscape Character Areas described in the updated Medway Landscape Character Assessment) and Green Infrastructure is going to become part of the development process, it would be advised that developers on adjoining sites work together from an early stage in the design process, and that applications are reviewed in a coordinated manner. Through coordinated design efforts, the costs and benefits associated with landscape protection and enhancement can be shared out fairly among relevant sites and communities.</p>
Policy NE6: Green Belt	
<p>Question NE6:</p> <p>NE6a Do you agree with the proposed policy for Green Belt? (Agree/Disagree)</p> <p>NE6b Please explain why you agree or disagree with the proposed policy for Green Belt</p> <p>NE6c Do you consider that the exceptional circumstances exist to justify the review of the Green Belt boundary? (Yes/No)</p> <p>NE6d Please explain why you consider / don't consider that the exceptional circumstances exist to justify the review of the Green Belt boundary</p> <p>NE6e Do you have suggestions</p>	<p>Homes England supports in principle the policy which essentially acknowledges the importance of the Green Belt in managing urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.</p> <p>Homes England note that the Council has reviewed the Green Belt and is giving 'broad consideration' and "testing if the exceptional circumstances exist that would justify a revision to the Green Belt Boundary in Medway" (Para 7.27, MLP Reg 18). Whilst there does not appear to be any formal Green Belt review in the Council's evidence base (under "Natural Environment and Green Belt") it will be important the evidence is shared to ensure a transparent and robust approach is taken by Medway Council, particularly as it is understood that no Green Belt sites are proposed to be released as part of the current Regulation 18 consultation document scenarios.</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
for alternative approaches to Green Belt policy?	
Policy NE7: Flood and Water Management	
<p>Question NE7:</p> <p>NE7a Do you agree with the proposed policy for flood and water management?</p> <p>NE7b Please explain why you agree or disagree with the proposed policy for flood and water management?</p> <p>NE7c Do you have suggestions for alternative approaches for this policy area?</p>	<p>Homes England agrees that the proposed policy is reasonable and would make the following comments:</p> <p>It may be beneficial to add reference to permeable paving, swales, attenuation ponds and filter drains as these should be considered to aim to improve the water quality before being discharged into watercourses.</p> <p>It is noted that the formatting of paragraph 7.37 on page 109 needs reviewing as there may be missing text.</p> <p>The proposed built development at Lodge Hill is located within Flood Zone 1, although a small area within the current red line boundary around Four Elms Roundabout falls within Flood Zone 2, but this would not affect the proposed masterplan scheme.</p>
Policy NE 8: Air Quality	
<p>Question NE8:</p> <p>NE8a Do you agree with the proposed policy for air quality?</p> <p>NE8b Please explain why you agree or disagree with the proposed policy for air quality?</p> <p>NE8c Do you have suggestions for alternative approaches for this policy area?</p>	No Homes England comments.
Section 8. Built Environment	
Q14 Thinking about the built environment section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to support sustainable development and high quality design in Medway?	For Homes England comments please refer to the responses to the Built Environment policies below.
Policy BE1: Promoting High Quality Design	
<p>Question BE1:</p> <p>BE1a Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan? (Yes/No)</p> <p>BE1b Please explain why you think that the proposed policy for high quality design do / don't represent the most appropriate approach for the Medway Local Plan</p> <p>BE1c What do you consider</p>	<p>BE1a - Homes England agrees in principle with the policy approach for housing design.</p> <p>BE1b - It is important that Medway Council has appropriate tools and processes for assessing and improving the design of development (draft NPPF para 128). The emerging draft NPPF para 128 states that this could include: "design advice and review arrangements, which should be used as early as possible in the evolution of schemes. Other tools include assessment frameworks, such as Building for Life, and design workshops. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels." Homes England support the policy approach to encourage the use of 'Building for Life 12' to guide the</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?</p>	<p>design of buildings. The proposed Lodge Hill scheme is, in principle, compliant with BFL12 and able to meet a BREEAM standard of 'Very Good' for non-residential uses.</p> <p>BE1c - The policy encourages compliance with Lifetime Homes. This standard has now been superseded by the national technical housing standards (Building Regulations M4). Homes England does not have any particular concern regarding the reference to Lifetime Homes as this is not specified as mandatory. However Homes England's policy position in relation to energy efficiency in buildings requires compliance with the Building Regulations.</p> <p>Homes England supports the need for developments to "create a safe environment" not just in the operational phase of the development, but also in providing opportunities to ensure brownfield sites are fully remediated to an appropriate standard suitable for subsequent re-use. In the case of Lodge Hill this means that the site should have a strategy which would facilitate, if necessary, the clearance of hazards, including any contamination or unexploded ordnance, prior to construction and/or public access. This remediation programme could be phased to reflect nature conservation considerations as appropriate.</p>
Policy BE2: Sustainable Design	
<p>Question BE2: BE2a Does the proposed policy for sustainable design represent the most appropriate approach for the Medway Local Plan? (Yes/No) BE2b Please explain why you think the proposed policy for sustainable design does / doesn't represent the most appropriate approach for the Medway Local Plan BE2c What do you consider would represent a sound alternative approach towards sustainable design in the Medway Local Plan?</p>	<p>Homes England supports high standards of sustainable design and construction to be integrated into new developments, where feasible.</p>
Policy BE3: Housing Design	
<p>Question BE3: BE3a Does the proposed policy for housing design represent the most appropriate approach for the Medway Local Plan? (Yes/No) BE3b Please explain why you think the proposed policy for housing design does / doesn't represent the most appropriate approach for the Medway Local Plan BE3c What do you consider would represent a sound alternative approach for</p>	<p>Homes England supports the policy and the reference to the Government's Nationally Described Space Standards, which new accommodation should meet as a minimum and acknowledge the scope in the policy to allow any 'updated' Government standards to be adequately reflected in future decision making.</p> <p>The Medway Housing Design Standard references standards from the Interim edition of the London Housing Design Guide. This has since been superseded and some standards vary from the Nationally Described Space Standards (e.g. minimum floor to ceiling 2.5m whereas NDSS is 2.3m), many housebuilders would not achieve this with their standard house-type ranges. However, in practice given that as the Draft Local Plan only references specific sections of the standards, which don't include these variations then, Homes England is supportive of these proposals in principle. The proposed Lodge Hill scheme will accord with</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
housing design in the Medway Local Plan?	these standards.
Policy BE4: Housing Density Approach	
<p>Question BE4:</p> <p>BE4a Does the proposed policy for housing density represent the most appropriate approach for the Medway Local Plan?</p> <p>BE4b Please explain why you think the proposed policy for housing density does / doesn't represent the most appropriate approach for the Medway Local Plan</p> <p>BE4c Is there an alternative way to express optimum net residential density, e.g. habitable rooms per hectare?</p> <p>BE4d What do you consider would represent a sound alternative approach for housing density in the Medway Local Plan?</p>	<p>Homes England concurs with the need to "support developments at higher densities in appropriate locations" and the approach to "consider varying attitudes to density on a case by case basis in developing masterplans and development briefs for regeneration sites." This thinking should also be applied to developing masterplans for the Greater Hoo Development Option (including Lodge Hill) where the density of development should clearly reflect the character, accessibility environmental impacts and infrastructure capacity of the area.</p> <p>The draft NPPF Para 123 advises the following in relation to density: Plans should contain policies to optimise the use of land in Medway and meet as much of the identified need for housing as possible. The use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas Local planning authorities should refuse applications which they consider fail to make efficient use of land. This is particularly important in the context of housing need "where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site." (para 123, draft NPPF). This is considered relevant in the context of Medway but flexibility to reflect local circumstances is critical, including market conditions and ability to access public transport modes.</p>
Policy BE5: Historic Environment	
Policy BE6: Managing development in the historic environment	
<p>Question BE5:</p> <p>BE5a Do the proposed policies for the historic environment represent the most appropriate approach for the Medway Local Plan?</p> <p>BE5b Please explain why you think the proposed policies for the historic environment do / don't represent the most appropriate approach for the Medway Local Plan</p> <p>BE5c What do you consider would represent a sound alternative approach towards planning for the historic environment in the Medway Local Plan?</p>	<p>Homes England supports in principle Heritage Policies BE5 and BE6 subject to the following comments.</p> <p>Policy BE5: Historic Environment</p> <p>Homes England suggest a number of tracked changes for consistency with National Policy, noting that the local plan should not simply restate NPPF policies:</p> <p>This will be achieved through:</p> <ul style="list-style-type: none"> <li>Restricting development that could have an unacceptable impact on a designated heritage asset and/or its setting;</li> <li>Ensuring that new development contributes to local distinctiveness and character;</li> <li>Encouraging development that makes sensitive use of historic assets, particularly where they are under-used or redundant;</li> <li>Promoting the conservation of historic buildings considered to be 'at risk';</li> <li>Resisting demolition or destruction of heritage assets without substantial justification that clearly demonstrates that public benefit outweighs the harm or loss resulting from the demolition or destruction;</li> <li>Working with stakeholders on heritage initiatives, including bids for</li> </ul>

Response to Medway Regulation 18 Local Plan	Homes England Comment
	<p>funding.</p> <p>The penultimate bullet point is queried as it merely restates the relevant NPPF provision (para 133)</p> <p>In Para 8.32 the paraphrase of s66 of Planning Act 1990, as amended is not accurate and should be amended as follows "In making decisions regarding a Listed Building, the council must have particular regard to the importance of preserving the building, its setting or any features that are of special architectural or historic interest."</p> <p>Policy BE6: Managing development in the historic environment Homes England observes that the emboldened text below appears unduly onerous. Effectively any structure can be understood as a heritage asset, and this restates the NPPF tests for the most designated heritage assets, applying them to all heritage assets. Suggest insertion of wording to make it clear that justification for demolition/loss would be proportionate to the significance of the heritage asset.</p> <p>'The demolition or other loss of a heritage asset will not be permitted unless it can be demonstrated that there are exceptional and overriding reasons; and that methods of preserving the asset have been investigated proportionate to the significance of the asset. In the circumstances where the loss of a heritage asset can be fully and robustly justified, the developer must make information about the heritage asset and its significance available to the council, along with making it possible for any materials and features to be salvaged.'</p>
Section 9. Health and Communities	
Q17 When developing the Local Plan what things do you think the council should consider to help improve the quality of life for Medway's residents?	For Homes England's comments please refer to the responses to the policies below.
Policy HC1: Promoting Health and Wellbeing	
Question HC1: Does the proposed policy for Health and Wellbeing represent the most appropriate approach to planning for health improvements in Medway?	<p>Homes England agrees in principle with this approach and the need for new developments to be "sustainably located with access to local health facilities". The proposed Lodge Hill masterplan incorporates sufficient mixed-use provision to be able to incorporate healthcare provision within the layout, subject to on site need requirements, wider provision relating to Hoo Rural Town and a provider expressing interest in this at a later stage.</p> <p>The Greater Hoo Development Scenario will seek to incorporate suitable health infrastructure and reference to this should be made in the Infrastructure Delivery Plan. Homes England will explore means by which the proposed development may support the overall sustainability of development on the Hoo Peninsula. Homes England highlights the contribution Lodge Hill will make in providing for the recreational needs of the community, and potential linkages with the wider green infrastructure strategy, in order to promote healthy lifestyles.</p>
Question HC2: Do you agree with the	No Homes England comment.



Response to Medway Regulation 18 Local Plan	Homes England Comment
proposed threshold for HIAs?	
Question HC3: Do you agree with the council's proposed approach to managing Hot Food Takeaways?	No Homes England comment.
Question HC4: What do you consider would represent a sound alternative approach towards planning for health in the Medway Local Plan?	No Homes England comment.
Policy HC2: Community Facilities	
Question HC5: HC5a Does the proposed policy for Community Facilities represent the most appropriate approach to planning for this aspect of social needs in Medway? (Yes/No) HC5b Please explain why you think the proposed policy for Community Facilities does / doesn't represent the most appropriate approach to planning for this aspect of social needs in Medway HC5c Do you agree with the proposed approach to addressing the presumption against loss of community facilities? (Yes/No) HC5d Please explain why you agree or disagree with the proposed approach to addressing the presumption against loss of community facilities HC5e What do you consider would represent a sound alternative approach towards planning for community facilities in the Medway Local Plan?	<p>Homes England supports the approach that "large scale residential developments will be required to provide community facilities to meet the needs of new residents and seek opportunities to support integration with existing communities" provided that appropriate demand can be evidenced and the proposals are financially viable. This would contribute towards the plan being positively prepared in accordance with NPPF paragraph 70. The Infrastructure Delivery Plan and emerging local plan policy should indicate clearly the Council's reasonable expectations for delivery of community facilities in connection with the Council's preferred development scenario.</p> <p>The proposed development at Lodge Hill includes provision for a community facility and local shops, which would provide the basis of a community hub. The historic and current uses at the site have prevented public access to the majority of the site area. The new residential-led mixed-use settlement proposed for Lodge Hill will open up this area to offer employment floorspace, high quality public realm, community uses, and market and affordable housing that will combine to bring a new mixed use community to Medway District. Together with the social infrastructure created as part of the Hoo Rural Town the proposed development will provide opportunities for greater social interaction between residents, workers, visitors and the wider community.</p> <p>The proposed on-site community facilities at Lodge Hill will fit well with the demands arising from the proposed development and the proposals have been designed to ensure it can provide maximum flexibility which can address changing demands over time.</p>
Section 10. Infrastructure	
Q20 Thinking about the infrastructure section of the Development Strategy, please answer the following question. When developing the Local	For Homes England's comments please refer to the responses to the Infrastructure policies below.

Response to Medway Regulation 18 Local Plan	Homes England Comment
Plan what things do you think the council should consider to help improve Medway's infrastructure?	
Policy I1: Infrastructure Planning and Delivery	
<p>Question I1:</p> <p>I1a Does the proposed policy for Infrastructure planning and delivery represent the most appropriate approach to planning for infrastructure improvements in Medway? (Yes/No)</p> <p>I1b Please explain why you think the proposed policy for Infrastructure planning and delivery does / doesn't represent the most appropriate approach to planning for infrastructure improvements in Medway</p> <p>I1c What do you consider would represent a sound alternative approach towards planning for infrastructure in the Medway Local Plan?</p>	<p>Homes England agrees, in principle with this policy approach but would highlight that the Infrastructure Delivery Plan needs to be progressed rapidly, as it is a key component of the plan, and is required by landowners/developers to underpin their delivery assumptions and viability appraisals. Equally it would be helpful to understand the extent to which infrastructure proposals are aligned with the development scenarios. Homes England would welcome the opportunity for ongoing engagement to discuss potential mechanisms to fund and deliver this strategic infrastructure both for Lodge Hill and the Hoo Rural Town with Medway Council.</p> <p>Significant new infrastructure will be needed to support the Council's preferred scenario, particularly in the context of the Government's Standard Method for calculating housing need and this will need to be evaluated carefully as regards potential impacts as part of the sustainability process. The phasing and timing of delivery are critical considerations alongside funding. Homes England can potentially play a key role, particularly in unlocking the regeneration of Lodge Hill. It will be critical to ensure that the emerging Infrastructure Delivery Plan is coordinated to ensure that it encapsulates the requirements of the overall quantum of development proposed at Lodge Hill and the wider development at Hoo St Werburgh to ensure the necessary infrastructure is provided in a timely manner.</p> <p>Policy I1 includes reference to the Local Plan identifying land for safeguarding for the provision of future infrastructure – no details are provided at this stage but any such proposals should be appraised as part of the SA to avoid risk of a challenge;</p> <p>Homes England suggest adding the words 'up to date': Development coming forward in Medway will be expected to contribute to the delivery of new and improved infrastructure, in line with the council's up to date evidence base and policy for infrastructure contributions from developers.</p>
Policy I2: Developer Contributions	
<p>Question I2:</p> <p>I2a Does the proposed policy for developer contributions represent the most appropriate approach? (Yes/No)</p> <p>I2b Please explain why you think the proposed policy for developer contributions does / doesn't represent the most appropriate approach</p> <p>I2c What do you consider would represent a sound</p>	<p>Homes England support this policy approach in broad terms and notes the possible implementation of CIL alongside the existing arrangements in the Council's "Guide to Developer Contributions (2014)". Homes England is supportive of the appropriate delivery of infrastructure, however objects to the requirement that all "infrastructure is delivered ahead of the development being occupied" as, in some instances, it may be more appropriately phased throughout the development of a scheme to have regard to funding and technical issues.</p> <p>Homes England's representations on the Medway Developer Contributions and Obligations Document (Published January 2018) outline the need to ensure all proposed changes to the contributions sought are fully justified by the available evidence. It is suggested that</p>



Response to Medway Regulation 18 Local Plan	Homes England Comment
alternative approach for developer contributions in the Medway Local Plan?	Policy I2 should make reference to the possible utilisation of CIL contributions as per paragraph 10.7.
Policy I3: Education	
<p>Question I3:</p> <p>I3a Does the proposed policy for Education represent the most appropriate approach for planning for education facilities? (Yes/No)</p> <p>I3b Please explain why you think the proposed policy for Education does / doesn't represent the most appropriate approach for planning for education facilities</p> <p>I3c What do you consider would represent a sound alternative approach for planning for education facilities in the Medway Local Plan?</p>	Homes England is supportive of the policy which aims to ensure sufficient provision and choice of school places, a key element in achieving sustainable development.
Policy I4: Communications Technology	
<p>Question I4:</p> <p>Does the proposed policy for Communications represent the most appropriate approach for the Local Plan?</p> <p>What do you consider would represent a sound alternative approach for planning for communications infrastructure in the Medway Local Plan?</p>	No Homes England comment.
Policy I5: Utilities	
<p>Question I5:</p> <p>Does the proposed policy for Utilities represent the most appropriate approach for the Local Plan?</p> <p>What do you consider would represent a sound alternative approach for planning for utilities infrastructure in the Medway Local Plan?</p>	<p>Homes England agrees with the general policy approach.</p> <p>In the context of progressing the Infrastructure Delivery Plan (and particularly if the 'Standard Method' is adopted), Homes England notes that more information on phasing of proposed developments and anticipated timescales will assist utility companies being able to plan more proactively for future utility infrastructure upgrades and reinforcement works. This would assist in providing more certainty on utility strategy, securing of the required service capacity and provision of cost estimates for the service infrastructure.</p>
Policy I6: Open Space and Sports Facilities	
Policy I7: New Open Space Provision	
Policy I8: New Playing Pitches	
<p>Question I6:</p> <p>I6a Do the proposed policies</p>	Homes England support the principle of the emerging policy, however has specific comments in relation to the proposed open space on

Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>for open spaces, sports facilities and playing pitches represent the most appropriate approach for the Local Plan? (Yes/No)</p> <p>I6b Please explain why you think that the proposed policies for open spaces, sports facilities and playing pitches do / don't represent the most appropriate approach for the Local Plan</p> <p>I6c What do you consider would represent a sound alternative approach for planning for open spaces, sports facilities and playing pitches in the Medway Local Plan?</p>	<p>Lodge Hill.</p> <p>Whilst the draft policy is that no existing open space or sports facilities are to be built on, the policy acknowledges scope for alternative provision, i.e. unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, which does provide an element of flexibility.</p> <p>Homes England notes Sport England's comment that "No sites, including playing fields, should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field" unless in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions. This includes exception 4 which states "the area of playing field to be lost will be replaced, prior to the commencement of development by a new area of playing field or fields of equivalent or greater quality or quantity, in a suitable location and subject to equivalent or better access arrangements."</p> <p>Homes England considers that the broad thrust of policies I6 and I7 is appropriate.</p> <p>It is noted that the 'Lodge Hill Recreation Ground' is highlighted in Table 11.1 as potentially affected by the Lodge Hill allocation (also known as Swinton Avenue playing fields). In the current masterplan, the playing fields south of Swinton Avenue would be lost, however these have not been used for in excess of five years, probably closer to ten years. As a consequence of this time period Sports England would not be a statutory consultee in any planning application and so any comments they make on the Local Plan allocation at Lodge Hill must be seen in the wider context of the regeneration of the site.</p> <p>The NPPF paragraph 74 states that, existing open space or sports area should not be built on unless they would be replaced by equivalent or better provision in terms of quality and quantity. The loss of this open space should be seen in the light of :</p> <p>The piecemeal location and configuration of the site, originally related to the military barracks, but now no longer used. This location would prejudice the delivery of comprehensive masterplan for the Lodge Hill site.</p> <p>The significant oversupply of other types of public open space within the Lodge Hill masterplan, amounting to c.31ha plus a further 230ha in Homes England's ownership. There is scope to re-profile the future use of some of this open space to address local needs categories.</p> <p>The provision of around 1.2ha of playing fields attached to the proposed primary school which will be designated as a dual use facility to benefit both the school and the local community.</p> <p>Given the oversupply of certain types of open space at Lodge Hill and environmental considerations, it is proposed that residents will be given access to playing fields delivered in other, more appropriate, parts of the Hoo Rural Town. Homes England would seek to make appropriate financial contributions towards the building and upkeep of these facilities under draft Local Plan Policy I2.</p>
Policy I9: Gillingham Football Club	
Question I7:	No Homes England comment.

Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>Do you agree with the proposed policy for Gillingham Football Club?</p> <p>Do you support the relocation of Gillingham Football Club to a new stadium in Medway?</p> <p>Where do you consider would be a suitable location for a relocated stadium?</p>	
<p>Question I8: What uses would you expect to see come forward as part of any new stadium proposals?</p>	<p>No Homes England comment.</p>
<p>Section 11. Transport</p>	
<p>Policy T1: Promoting sustainable transport</p>	
<p>Q23 Thinking about the transport section of the Development Strategy, please answer the following question. When developing the Local Plan what things do you think the council should consider to support a sustainable and effective transport network in Medway?</p>	<p>It is acknowledged that transport modelling work has been carried out by Medway Council to underpin the likely impacts from development.</p> <p>Given that this work did not include the proposed “up to 2,000 homes” development at Lodge Hill, Homes England has undertaken transport modelling work in conjunction with MC’s consultants, to determine the impacts of a up to 2,000 scheme.</p> <p>Homes England report that the modelling undertaken by Medway’s consultants supports the case for Lodge Hill development of up to 2000 dwellings. It is noted that even with:</p> <p>(1) No account for the reduction in vehicular trips associated with future sustainable transport measures across all the Local Plan development sites;</p> <p>(2) No account for peak spreading resulting in overinflated peak hour trips; and,</p> <p>(3) No Local Plan Growth associated physical highways improvements.</p> <p>It is still considered reasonable to suggest that development traffic impacts as a result of up to 2,000 homes at Lodge Hill could be accommodated within the highway network, with appropriate improvement schemes implemented to mitigate its impact.</p> <p>In reality the level of peak hour traffic flows ultimately reported will be less than that shown within the current robust Aimsun modelling work, which adds weight to an allocation of up to 2,000 homes at Lodge Hill.</p> <p>It is suggested that the required highways mitigation measures could be considered with a degree of certainty in regards of their deliverability due to both the available open land abutting the key junctions and historical context of mitigation measures in the vicinity of these impacts. It is therefore considered that there is no reason in terms of traffic and transportation impact to preclude the Lodge Hill development option (up to 2000 dwellings) from being included within the Local Plan options.</p>
<p>Question T1: T1a Do you agree that this approach offers an appropriate strategic approach to transport planning in Medway?</p>	<p>T1a. Homes England agrees in principle with the policy approach with the following comments. Whilst the overarching principles set out appear logical we do have a comment regarding the modelling work undertaken to date to define the impact of the four scenarios. The four scenarios modelled have been reduced to one, and based on solely trip generation, this simplistic approach could potentially have flaws,</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>(Agree/Disagree)</p> <p>T1b Please explain why you agree or disagree that this approach offers an appropriate strategic approach to transport planning in Medway</p> <p>T1c What do you consider would represent a sound alternative approach towards sustainable transport in the Medway Local Plan?</p>	<p>given that it takes no account of the relative impact on the network of all four scenarios in terms of spatial impact and the level of improvements required for each scenario. It is noted that time constraints may have resulted in this process, but nevertheless this potential flaw needs to be addressed if the modelling work is to properly inform the spatial planning process.</p> <p>T1b. The modelling approach appears to have prematurely refined the scenarios to scenario 3 based on total trip generation alone. This approach is considered to potentially be short sighted as it takes no account of the ability to physically improve the highway network, or the different impacts in different areas that each scenario would have on the highway network. Importantly it is noted that the modelling work undertaken lacks pre and post peak periods and as such falsely assumes that the growth in traffic within the peak hour will not result in peak spreading. This artificially inflates the peak hour traffic flows and is considered to not be as representative as possible at this stage. The model would benefit from having pre and post peak periods to allow traffic to build and peak spread within the peak period to ensure that the residual peak hour trips are reflective and more robust.</p> <p>Homes England supports the need to enable "sustainable transport" and the requirement for Transport Assessments and Transport Statements to mitigate the impacts of new development. This approach appears consistent with national policy. Homes England support the need to "plan for strategic road and rail improvements" but also underlines the importance of aligning the spatial strategy of the Local Plan with infrastructure delivery (draft NPPF para 105, b, see also NPPF para 31). In addition, Homes England supports compliance with the Medway Local Transport Plan (2011-26).</p> <p>T1c. Better recognition of the effect that high frequency bus services and cycle infrastructure can play to increase sustainable travel for areas of development outside of town centres.</p>
<p>Policy T2: Integrating Land Use and Transport Planning</p>	
<p>Question T2:</p> <p>T2a Do you agree/disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway? (Agree/Disagree)</p> <p>T2b Please explain why you agree or disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway</p>	<p>T2a. Homes England agrees in principle with the policy however note that the lack of reference to acceptable cycling distances or accessibility to high frequency bus services (e.g. a 10 minute service) could be deemed as making this policy unduly town centre focussed.</p> <p>T2b. This limits the opportunity to harness sustainable sites outside of walking distance to Rail Stations. Acknowledgment of the important role that high frequency bus services can have when linked to key destinations (rail stations / town centres) where there is limited car parking alongside accessible cycle routes (where cycle parking is provided) can play to reduce single car person trips. Whilst it is noted that a hierarchy could be in place for these modes, the lack of reference to high frequency public transport and cycling accessibility is considered a potential failing in this policy aimed at integrating land-use and transport.</p> <p>Homes England thus propose that support is also given to higher densities in locations in close proximity to high frequency bus routes and appropriate higher densities in relation to distance to bus stops and not just railway stations.</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
<p>Question T3:</p> <p>T3a Research has demonstrated the non-linear relationship between housing density and public transport use. However, in principle, do you agree/disagree that densification is more likely to increase the viability of additional and/or improved public transport services? (Agree/Disagree)</p> <p>T3b Please explain why you agree or disagree that densification is more likely to increase the viability of additional and/or improved public transport services</p>	<p>T3a. The indicators for higher densification are set out as being within set walking distances to key rail stations and as such these shall rightly be a benefit to the sustainability of the rail services. These may not however directly correlate to an increased use of public transport given the walkable core within reach of the high density developments. Bus route sustainability is increased through low delay routes with maximum patronage along the route, such as, for example, that proposed by the Hoo Peninsula extension of the 192 service, upgraded to a 10 minute high frequency bus provision which shall connect a large number of patronage to key locations such as Strood, Chatham and Rochester. So whilst densification has a part to play in increasing the sustainability of public transport services in terms of both rail and bus services, high frequency, low delay routes through large built up areas are also key factors to delivering sustainable bus services. Evidently appropriate car parking charges at key destinations support the attractiveness of bus routes.</p> <p>T3b. A key parameter to providing sustainable transport is providing bus routes which are relatively free flowing and routes which benefit from patronage along the vast majority of their route. Suitable parking constraints at key destinations along with priority routes for buses can also assist at congested interchanges via targeted bus lanes / gates.</p>
<p>Question T4:</p> <p>T4a The optimum densities set out at Table 11.1 are likely to be achieved in the absence of this policy due to their central locations. Is it appropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs? (Yes/No)</p> <p>T4b Please explain why you think it is appropriate / inappropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs</p> <p>T4c For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare? (Yes/No)</p> <p>T4d Please explain why, for peripheral areas, you think it is appropriate / inappropriate to require a minimum of 35 dwellings per hectare?</p> <p>T4e Would it be appropriate to include Cuxton and Halling stations in Table 11.1?</p> <p>T4f Please explain why you think it would be appropriate / inappropriate to include Cuxton and Halling stations in</p>	<p>T4 a, b, c and d:</p> <p>Homes England consider that density has an important part to play in securing optimum and effective use of land. This is particularly relevant in circumstances "where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site." (draft NPPF 123). Homes England thus support the minimum density of 35dph in peripheral areas, given the overall housing need position, however would propose some flexibility in the density figure to reflect local circumstances particularly in locations in close proximity to high frequency public transport.</p> <p>T4e and f: No Homes England comment.</p>

Response to Medway Regulation 18 Local Plan	Homes England Comment
Table 11.1	
Question T5: What do you consider would represent a sound alternative approach towards the integration of land use and transport planning in Medway?	Akin to the response to T2a and b, Homes England proposes that recognition is also given to the potential for higher densities in locations in close proximity to high frequency bus routes and appropriate higher densities in relation to distance to bus stops and not just railway stations or Chatham Waterfront Bus interchange.
Policy T3: Hoo Peninsula rail connection	
Question T6: T6a Do you support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight? (Yes/No) T6b Please explain why you support / do not support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight T6c The council welcomes responses indicating areas of land to be safeguarded. This information could be considered in a business case, subject to funding. T6d What alternative approaches would you suggest?	<p>T6a: Homes England agrees in principle that a rail upgrade to the Grain freight line could be helpful to the delivery of housing and economic growth on the Hoo Peninsula, however has concerns that the proposal should not delay the Local Plan Programme, given the large amount of technical work outstanding on this project.</p> <p>T6b. Whilst we acknowledge that a rail upgrade serving the Grain freight line to enable passenger services would be helpful to growth, in the event that this is not deliverable given the national constraints of limited rolling stock / capital investment / line capacity then it will be important to ensure that Medway Council has a fall-back position should the rail upgrade be deemed unviable or delayed given the need to facilitate the proposed development scenarios. It is suggested that the fall-back position could be a high quality frequent bus or partial rapid bus transit service to serve the HPRT linking to local railway stations and other public transport hubs. This would be more deliverable with significant benefits to modal shift which would ensure that proposed development on the Hoo Peninsular could still be considered a sustainable location for growth (para 11.22). Homes England suggests an amendment to the text, to provide recognition that a high frequency bus route is a suitable alternative to reducing car commuting to key destinations from the Hoo Rural Town.</p> <p>As regards areas of land to be safeguarded, it is not possible given that the technical work is only at an early stage to indicate which areas of land should be safeguarded. The reasons for safeguarding of relevant land parcels will need to be justified and subject to consultation in line with statutory procedures. This information will need to be reflected in the emerging Local plan (or review thereof) when appropriate.</p> <p>Homes England note the Council's expression of interest bid in response to the government's Housing and Infrastructure Fund (HIF). Given that one of the development scenarios (2) is based on the potential for the HIF bid to support increased infrastructure, Homes England make the following observations: The need for Medway Council to build in sufficient flexibility/ provision to enable development scenarios to be delivered regardless of the outcome of the HIF bid.</p> <p>T6c: No Homes England comment.</p> <p>T6d: No Homes England comment.</p>
Policy T4: Rochester Airport	
Question T7: Do you agree with the	No Homes England comment.

Response to Medway Regulation 18 Local Plan	Homes England Comment
proposed policy for aviation in Medway? What alternative approach would you propose for planning policy for aviation in Medway?	
Policy T5: Riverside Infrastructure	
Question T8: Do you agree with the proposed policy for riverside infrastructure in Medway?	No Homes England comment.
Question T9: Do you consider the flexible approach to Chatham Docks to be appropriate?	No Homes England comment.
Question T10: What alternative approach would you propose for planning policy for riverside infrastructure in Medway?	No Homes England comment.
Policy T6 – Medway Riverside Path	
Question T11: Do you agree with the proposed policy for a riverside path in Medway? What alternative approach would you propose for planning policy in Medway?	No Homes England comment.
Policy T7: Marinas and moorings	
Question T12: Do you agree with the proposed policy for marinas and moorings in Medway? What alternative approach would you propose?	No Homes England comment.
Policy T8: Urban Logistics	
Question T13: Do you agree with the proposed policy for planning for logistics in Medway? This is believed to be the first local planning policy of its kind. It has been prepared in response to recent sector articles calling for planning policy interventions. The council would welcome responses to refine or develop an alternative policy to	No Homes England comment.



Response to Medway Regulation 18 Local Plan	Homes England Comment
support the growth of this sector in Medway. What alternative approach would you propose for planning for the logistics sector and managing associated transport in Medway?	
Policy T9: Connectivity and Permeability	
Question T14: Do you agree with the proposed policy for connectivity and permeability in Medway? What alternative approach would you propose for planning for the logistics sector and managing associated transport in Medway?	No Homes England comment.
Policy T10: Vehicle Parking	
Policy T11: Cycle parking and storage	
Policy T12: Managing the transport impact of development	
Question T15: T15a Do you agree with the proposed policy approaches for managing the transport impacts of development and provision for parking? (Agree/Disagree) T15b Please explain why you agree or disagree with the proposed policy approaches for managing the transport impacts of development and provision for parking T15c There may be opportunities to secure a 'dockless' bike sharing scheme in Medway, however this is likely to be initiated by the market. This may be appropriate for specific routes, such as to/from Chatham rail station and the university campuses. Would it be prudent to seek to manage this through planning policy? T15d Please explain why you think it would / wouldn't be prudent to seek to manage this through planning policy T15e What alternative	<p>T15a. Homes England agrees in principle with the policy.</p> <p>T15b. Homes England supports the policy which reflects the national requirements for Transport Assessment and Travel Plans to support applications that generate significant amounts of movement. There also needs to be a joined up approach with the identification and delivery of transport infrastructure alongside the Council's chosen development scenario to enable implementation and inform viability. At present the level of information on infrastructure delivery associated with the emerging local plan is limited. The early publication of additional information is encouraged by Homes England.</p> <p>T15c. No Homes England comment.</p> <p>T15d. No Homes England comment.</p> <p>T15e. No Homes England comment.</p>



Response to Medway Regulation 18 Local Plan	Homes England Comment
approaches would you propose for policy in the new Medway Local Plan?	
Section 12. Minerals, Waste and Energy	
Policy MWE1: Minerals Supply	
Policy MWE2: Land-won extraction of sands and gravels	
Policy MWE3: Land-won minerals: chalk and clay	
Policy MWE4: Minerals wharves and railheads	
Policy MWE5: Minerals infrastructure	
Question MWE1: Do the proposed policies MWE1-MWE5 represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway? What do you consider would represent a sound alternative strategy for minerals planning in the Medway Local Plan?	No Homes England comment.
Policy MWE6: Waste Management	
Policy MWE7: New Waste Management Facilities	
Policy MWE8: Existing Waste Management Facilities	
Policy MWE9: Waste disposal to land	
Policy MWE10: Waste Water Treatment Works	
Question MWE2: Do the proposed policies MWE6-MWE10 represent the most sustainable approach to managing Medway's waste? What do you consider would represent a sound alternative strategy for waste management in the Medway Local Plan?	No Homes England comment.
Policy MWE11: Energy and Renewables	
Policy MWE12: Low Carbon Development	
Question MWE3: Do the proposed policies MWE11- MWE12 represent the most sustainable approach to	No Homes England comment.

Response to Medway Regulation 18 Local Plan	Homes England Comment
planning for energy in Medway? What do you consider would represent a sound alternative strategy for energy in the Medway Local Plan?	

## 9. RESPONSE TO ALTERNATIVE SITES WITHIN MEDWAY

- 9.1 Following a review of the evidence-based documentation published to date by the Council in respect of the sites identified for each of the four development scenarios, it is noted that the proportion of capacity intended to be derived from allocated sites varies between the scenarios as currently identified. This is set out below:

Scenario 1 – Meeting Objectively Assessed Need	16,497
Scenario 2 – Investment in Infrastructure to Support Growth	17,580
Scenario 3 – Meeting Government's Proposed Calculation of Local Housing Need	22,508
Scenario 4 – Consideration of Development Within Lodge Hill SSSI	17,116

### INTERIM OBSERVATIONS

- 9.2 It is noted that other elements of supply making up the total requirements for each scenario, namely pipeline sites (completions and permissions) and windfall allowances, are consistent. The variation in the total capacity figures identified across the scenarios is attributed to both the number of sites being identified and, in respect of Scenario 2, an assumption that densities on some urban sites can be increased.
- 9.3 At the time of preparing these representations, site-specific information made available by the Council in order to inform consultation into the Development Strategy is comprised of the Strategic Land Availability Assessment (SLAA) 2017, the Annual Monitoring Report (AMR) 2017 – setting out the position on site availability at 31st March 2017 – and the Habitat Regulations Assessment 2018.
- 9.4 It is understood that the '2018' SLAA is in the process of being updated, whose evidence will be purportedly used to inform the site options identified within each of the scenarios. In the absence of this information, our review of potential alternatives to a 2,000-dwelling allocation at Lodge Hill is thus far predicated upon evidence seen to date. From the outset, there are a number of matters warranting further clarification.
- 9.5 In the first instance, there are a number of sites identified for each of the scenarios that are referenced within the HRA but not in the 2017 SLAA; in the absence of more up-to-date information being available, it is unclear how the availability and suitability of the sites has been assessed. This includes reference to site areas and indicative capacities; to address this we have made assumptions, where necessary, to inform an understanding of likely delivery across the sites during the plan period (see below).

- 9.6 Scenario 3, as currently identified, appears to be almost solely reliant on sites whose availability is unconfirmed (e.g. those outlined in blue) making up the increased housing requirement when the Government's proposed Standard Methodology is applied. From the evidence available, it is not possible to ascertain whether the sites are suitable for development in principle, or indeed whether they could deliver the required quantum of development at an appropriate density to ensure that the uplifted housing requirement is met.
- 9.7 Two sites which appear within each of the scenarios – refs. 0818 ('J7, Chatham Maritime) and 0820a ('Interface Land, Chatham Maritime – Northern Parcel) are identified as employment sites in the 2017 SLAA; the absence of information for the proposed change to residential allocation calls into question the suitability and deliverability of such sites in forming part of the housing land supply.
- 9.8 A number of the sites whose size and indicative capacity is identified in the 2017 SLAA appear inconsistent with the information recorded by the 2017 AMR. For example, site refs. 1088 ('Manor Farm, Parsonage Lane, Rochester') and 090 ('Strood Riverside') are recorded as having capacity for 375 and 394 dwellings respectively in the 2017 SLAA, as opposed to 250 and 190 dwellings identified by the 2017 AMR.
- 9.9 Furthermore, the 2017 SLAA, whilst having purportedly assessed all sites using a 6-stage methodology (outlined on p.9), and measuring performance against specified suitability criteria (p.10-17), provides no detailed breakdown of how sites have been scored. Moreover, a number of sites identified as potential allocations under all four scenarios have been assigned 'red' ratings which denote a lack of availability and/or suitability.
- 9.10 The Council will need to ensure that both the SLAA and AMR are updated in parallel so that their findings are aligned. This will be necessary to ensure that the forecast housing trajectories for the sites are consistent. The 2018 version of the SLAA should be aided by a comprehensive site matrix which sets out transparently how each site has been assessed against the suitability criteria.
- 9.11 As the Local Plan is progressed to the 'Preferred Option' stage, its proposed allocation sites will need to be informed by a robust and up-to-date SLAA which is aligned with the findings set out in the Sustainability Appraisal, such that the policies are justified against robust evidence and can be found sound.
- 9.12 Based upon the existing evidence, it is clear that none of the scenarios would deliver sufficient development which would achieve the Government's Standard Method of calculated need for Medway (37,143 dwellings for the plan period). Notwithstanding this, there are eight potential allocation sites identified within the draft Local Plan in respect of

- Scenarios 1, 2 and 3 which do not appear alongside the 2,000-dwelling allocation option for Lodge Hill in Scenario 4.
- 9.13 Based upon the existing evidence, it is clear that none of the scenarios would deliver sufficient development which would achieve the Government's Standard Method of calculated need for Medway (37,143 dwellings for the plan period). Notwithstanding this, there are eight potential allocation sites identified within the draft Local Plan in respect of Scenarios 1, 2 and 3 which do not appear alongside the 2,000-dwelling allocation option for Lodge Hill in Scenario 4. These include sites 0783c ('Capstone Valley, East Hill – Southern Parcel'), three sites at Rainham (Refs. 814, 1170 and 847) and one unnamed site.
- 9.14 At this stage, the Council's rationale for exclusion of the aforesaid sites alongside a 2,000-dwelling allocation at Lodge Hill is not clear. Taken collectively as part of a hybrid scenario, the total number of dwellings that could potentially be achieved (subject to site areas and capacities being confirmed) would exceed the Standard Method housing requirement, albeit by a relatively small margin of approximately 318 dwellings (this being the balance of 1,500 additional dwellings added to the supply table provided in respect of Scenario 3 on p.33 of the draft Local Plan.
- 9.15 Whilst the above represents a very high-level view based on the information available, it is important to note that it is unclear as to the extent to which that some larger strategic sites currently identified by MC (including those at Capstone Valley) could be developed and indeed the rate at which dwellings could be delivered during the plan period in order to address local housing need.
- 9.16 The Council will be aware that an important facet of the plan-making process, effected by paragraphs 47 and 49 of the NPPF, is the need to ensure that local plans meet the full objectively assessed needs for housing in the Housing Market Area (HMA) and a deliverable five-year housing land supply.
- 9.17 This approach is similarly transposed into the draft NPPF, with greater stringency applied through the proposed application of the Housing Delivery Test. One of the new requirements of the Test, as proposed, is that the presumption in favour of sustainable development will apply to planning applications where delivery against the housing requirement established by a local plan falls below 85% for the preceding three-year period.
- 9.18 The effect of the above will compound the need for Local Plans to be realistic as to the deliverability of sites for new housing, with greater onus placed on local planning authorities to ensure assumptions underpinning their housing land trajectories are realistic. In this context, the Council needs to give careful and informed consideration of site

deliverability based on the following principles which are not sufficiently addressed at present:

- 9.19 Net developable area – the proportion of a site that can be realistically developed will need careful consideration. This will need to take into account any demonstrable physical constraints i.e. retention of easements associated with utilities, landscape buffers either existing or proposed in order to mitigate the visual impacts of development upon sensitive settings and views, and how infrastructure and other open space requirements can be met (aided through a land use budget). Based upon initial review of larger sites identified for potential allocation, including for example the north and south parcels of land at Capstone Valley (Ref. 0783c), a cautious estimate of 50% net developable area means that resultant capacities will be somewhat lower than those that would ordinarily be achieved on more urban and less environmentally constrained sites. This needs to be expressly recognised within the Local Plan, as it will compound the shortfall already arising when the Standard Method housing requirement is applied.
- 9.20 Appropriate densities: densification of peripheral sites will need to take into account landscape and other environmental constraints. Table 11.1 of the draft Local Plan refers to a minimum density of 35 dwellings per hectare (dph) being applied to development on peripheral sites under Scenarios 2 and 3. The Council is reliant on a large number of peripheral sites potentially delivering across the Borough in order to help meet the requirements set out in the various scenarios. It is, however, unclear whether some of the peripheral sites identified for potential allocation could achieve this density level, in the absence of sufficient information relating to environmental effects and physical constraints.
- 9.21 Delivery trajectories: the Local Plan will need to incorporate a robust delivery trajectory which is informed by, where possible, developer-led assumptions on sales outlets and rates for each site. This will be necessary in to demonstrate a deliverable five-year housing land supply, and that sites can deliver in full against their assigned capacities.
- 9.22 In considering the above, the Council must be clear in its approach as to how previous shortfall should be captured, and make provision for an appropriate buffer within the total supply to minimise the risk of non/under-delivery of both strategic and non-strategic allocation sites within the plan period.
- 9.23 The alternatives, as currently presented, are not informed by robust delivery trajectory information to provide a prospective Inspector with reassurance that the sites identified can cumulatively achieve either the SHENA-derived objectively assessed housing need for the plan period, or indeed that applied through the Standard Methodology. This will need to be robustly addressed through future iterations of the draft Local Plan.

- 9.24 Based upon the information available, none of the alternatives could deliver a sufficient number of dwellings to meet the Standard Method housing requirement without the inclusion of a 2,000-dwelling allocation at Lodge Hill. As discussed in detail within the preceding sections of this report, the Council needs to devise a new development scenario to ensure the housing need can be fully met within the plan period.

## 10. RESPONSE TO THE LPDS SUSTAINABILITY APPRAISAL (SA)

10.1 Wood Environment and Infrastructure Solutions UK Ltd (Wood) has undertaken a review of the Sustainability Appraisal (SA) that accompanies the Regulation 18 consultation document on behalf of Homes England. It is recognised that this is an interim SA that does not need to be fully compliant with the SEA Directive (European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment) and enabling Regulations but it is hoped that the following comments will be helpful in assisting the Council to move towards a compliant report as the Local Plan progresses. The comments are structured around the following matters:

- Consideration of reasonable alternatives
- The appraisal of the scenarios
- Other reporting matters
- Consideration of Reasonable Alternatives

10.2 Reflecting the content of the Local Plan the SA considers four scenarios, three based on 29,463 homes and one on 37,143 homes (Scenario 3). Section 4 of these representations highlights that the number of dwellings identified under Scenario 3 falls short of the Government's 'Standard Method' requirement for 37,143 dwellings (there is a shortfall of some 1,182 homes). Therefore, as it stands the SA has not appraised options that meet this requirement. An obvious omission in terms of demonstrating the consideration of all reasonable alternatives is consideration of a scenario where Lodge Hill contributes 2,000 dwellings towards meeting the need for 37,143 homes over the plan period, which would effectively address the shortfall identified under Scenario 3. Options that will meet the requirement for 37,143 homes will need to be addressed in later iterations of the SA and technical work associated with the Local Plan. If MC wish to run an 'exceptions case' to demonstrate why the standard method housing target cannot be met, then the SA will need to be revisited in the light of these alternative scenarios to clearly show the objective evidence underpinning this argument.

10.3 There is no consideration of alternatives relating to the provision of employment land, e.g. would the provision of additional and/or replacement employment land be warranted under Scenario 3, to reflect the higher housing numbers?

10.4 Scenario 3 is partly met through the release of employment land for residential development but are there other alternative sites available that could be developed for housing instead (or provide replacement employment land);?



## THE APPRAISAL OF THE SCENARIOS

- 10.5 The four scenarios are appraised in Section 5 of the SA. There is no comparative analysis of the scenarios, which might reasonably be expected. Table One at the end of this response takes the scores from the four tables in the SA Report and presents them by objective for each scenario, providing the basis for a comparative analysis of the scenarios and a review of how Scenario 3 performs in comparison with the other scenarios.
- 10.6 Key points are:
- Scenario 3 performs less well than other scenarios against the following SA objectives:
    - 1 'Education and skills' – is scored as uncertain on the basis that the “scenario does not plan for additional infrastructure despite proposing a large number of houses to be developed over the plan period.” This seems an odd conclusion as it could reasonably be anticipated that additional infrastructure would need to be provided to reflect planned growth, otherwise the plan would not be found sound. All other scenarios are scored '+' against this objective in the medium and long terms;
    - Scenario 3 performs relatively poorly against SA objectives 2 and 3 relating to employment and the economy. It scores a significant negative effect in relation to both objectives in the long term, with other scenarios scoring positive and significant positive in the long term. The scoring for Scenario 3 is on the basis that additional housing growth would involve the reallocation of employment sites and a higher ratio of housing to employment sites would make local employment opportunities less accessible, increase rates of out commuting and remove growth and competitiveness from the Medway economy;
    - An uncertain effect is identified in relation to SA objective 12 'social inclusion' on the basis that loss of employment sites and increased out commuting could impact on sense of place;
    - All other scenarios score positively against SA objective 13 relating to the reduction of crime and fear of crime, however scenario 3 scores 'no impact' on the basis that inclusive communities would be more effective in ensuring this. The SA seems to be suggesting that the loss of employment opportunities might impact on social inclusion with a consequential impact on crime rates, but this is not made explicit.
    - Scenario 3 only scores minor positive against SA objective 14 'housing' because it falls 1,400 homes short of the associated target. This is despite the fact that the scenario would provide more housing than the other scenarios, which all score significant positive. It is suggested that Scenario 3 should score '++' given that the

amount of housing provided exceeds that provided in other scenarios and as such is much closer to satisfying the Government's 'standard method' housing target.

- The appraisal of scenarios against objective 4 'Town Centres' appears inconsistent. Scenario 2 scores minor negative on the basis that the new Hoo Rural Town may increase competitiveness (sic) for other established town centres. Other scenarios, which also include the Hoo Rural Town are scored differently as follows:
  - Scenario 1 scores '+' in the medium and long term, despite also including the Hoo Rural Town;
  - Scenario 3 score uncertain despite the fact that the SA states that "an increase in the number of residents in Medway may have positive impacts on town centres due to increased footfall, however the full effect is unknown."
  - Scenario 4 scores '+' in the short term and medium term and '?' in the long term on the basis that "the scale of the proposed rural town with Lodge Hill and Chattenden Village may increase competition between town centres and decrease footfall from Chat ham, which is a prioritised town centre for growth". This conclusion appears at odds with the conclusions of the Council's recent retail study which found that by limiting the scale of retail in the HPRT to serve local needs, then wider retail impacts would be limited. MC is invited to reconsider this scoring outcome.

10.7 Overall, it would appear that Scenario 3 is scored down relative to the other options but it also emphasises the need for the Local Plan to plan positively to meet the implications of additional housing growth, associated employment land and infrastructure. In the light of clear advice from Government aimed at boosting Medway's housing supply.

10.8 The appraisal of Scenario 4 (which includes 2,000 dwellings at Lodge Hill) takes into account the potential for positive as well as negative effects, e.g. in relation to biodiversity (SA objective 6 and cultural heritage (SA objective 9)). This is supported, but it will be important that other sites are appraised on the same basis in the SA.

#### OTHER REPORTING MATTERS

10.9 Whilst it is acknowledged that this is an interim SA Report the following matters are suggested as areas of the SA Report that will need addressing (references relate to the SEA Directive). MC may have these matters in hand but they go to the technical 'soundness' of the plan and consequently bear repeating. The next iteration of the SA should:

- include a Non-Technical Summary (Annex 1 (j));

- confirm when consultation on the scope of the SA took place, correcting the reference to the Scoping Report being published in 2016 (it was published in 2017) and include a summary of the comments received and a response to those (Article 8 of the SEA Directive);
- include an outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes (Annex I (a));
- summarise the evolution of the baseline in the absence of the plan for all topics in the SA report, which does not appear to be the case at the moment (Annex I (b));
- include a section on relevant plans and programmes and their objectives and how these have been taken into account in formulating the Local Plan. Appendix A of the Scoping Report identified relevant objectives from other plans and programmes and the implications for the Local Plan and SA, however the April 2018 report does not draw on this information, instead selected plans and programmes are referenced in Section 3 of the SA Report. (Annex I (e));
- include a comparative analysis of the scenarios (Annex I (f));
- include a discussion of the potential significant effects (positive and negative) associated with housing and employment sites and safeguarded land for infrastructure proposals. This should include consideration of the potential for cumulative effects (Annex I (f));
- include an outline of the reasons for selecting the alternatives dealt with (scenarios and sites) (Article I (h));
- confirm whether or not any difficulties were encountered in undertaking the SA (Article I (h)); and
- include an analysis of the proposed monitoring framework for the Local Plan and the extent to which it aligns with the topics in the SEA Directive. Clearly this is dependent on the monitoring framework being available (Annex I (j)).

10.10 In addition to the above, Planning Practice Guidance includes the following in relation to the role of the SA and it will be a key element of the report (Paragraph: 018 Reference ID: 11-018-20140306):

"The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan."

- 10.11 It is noted that the SA Framework has been revised. We would recommend that this is augmented with additional criteria relating specifically to the SA of sites in order to enable sites to be appraised on a consistent basis.

## Medway Council Scoring of SA Development Scenarios

	1. Education & Skills				2. Employment				3. Economy				4. Town Centres				5. Green & Open Spaces				6. Biodiversity				7. Climate change & pollution				8. Climate change adaptation & mitigation				9. Historic assets				10. Material assets				11. Health & wellbeing				12. Social inclusion				13. Crime				14. Housing				
Objective	Scenario	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4												
	ST	0	+	?	0	0	+	-	0	+	+	-	+	+	-	?	+	0	?	?	0	0	?	?	-	+	-	-	-	-	?	?	?	?	0	-	-	0	+	+	+	+	+	?	+	+	+	0	+	+	++	++	++				
	MT	+	+	?	+	+	+	-	+	+	+	-	+	+	-	?	+	0	?	?	0	0	?	?	-	+	-	-	-	-	?	?	?	?	0	-	-	0	+	+	+	+	+	?	+	+	+	0	+	+	++	++	++				
	LT	+	+	?	+	+	+	-	+	+	+	-	+	+	-	?	?	0	?	?	0	0	?	?	-	+	-	-	-	-	?	?	?	?	0	-	-	0	+	+	+	+	+	?	+	+	+	0	+	++	++	++	++				

Significant positive	++
Minor positive	+
Neutral	0
Unknown	?
Minor negative	-
Significant negative	--

## 11. OVERALL CONCLUSIONS

- 11.1 To sum up, as the NPPF (para 14) makes clear, there is a presumption in favour of sustainable development. In order for Medway Council to propose an allocation of up to 2,000 homes at Lodge Hill as part of a comprehensive regeneration scheme, the Authority must be persuaded that the proposals will contribute to the achievement of sustainable development and should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three (NPPF paras 151 and 152).
- 11.2 Lodge Hill, as will be evident from these representations, is a unique site and as such demands a bespoke response in terms of spatial planning. The military legacy and planning context make its circumstances challenging, but this should not be a reason to delay finding a solution that will provide an enduring and sustainable future for the site.
- 11.3 Now that Lodge Hill is owned by Homes England, the Government has put its full weight behind the site's comprehensive regeneration, but in a way that has regard to other important national planning policies, including the protection, and where practicable, enhancement of important environment and heritage assets. Lodge Hill's development potential is constrained but, equally, it provides, as one of the largest brownfield sites in the South-East, a huge opportunity as recognised for many years by regional and local development plans. Homes England, mindful of its statutory role, is the one organisation that has the powers, capacity and funding to realise the goal of comprehensive regeneration, working in partnership with key stakeholders, including MC.
- 11.4 Homes England has invested heavily in securing a substantial amount of survey material and evaluation work. This has demonstrated that without a significant remediation programme to address UXO and other contamination, the site will remain a major risk to human health and safety. These risks will increase with the bringing forward of the proposed Hoo Peninsular Rural Town (HPRT). Unless, and until, these remediation works are undertaken, large parts of the site will not be open public access without supervision.
- 11.5 It is simply not a realistic prospect to expect the public sector to retain a disused, operational site of c.325 ha, keep it secure and maintain it in perpetuity. The drain on the public purse would be too great; the costs would be unaffordable. There needs to be a compromise solution identified that can be delivered in a viable manner, but which seeks, as far as possible, to limit harm to the Chattenden Woods and Lodge Hill SSSI and the wider SSSI network in line with guidance in the NPPF. Homes England's proposal to use the delivery of a viable housing scheme to enable the comprehensive regeneration of the entire site (incorporating new homes, site remediation and a major new nature

conservation reserve) is the only means available to resolve the challenges provided by Lodge Hill.

- 11.6 MC has not been able to demonstrate a 5-year supply of deliverable housing sites for a number of years. Pressure on the Council has increased as a result of the proposed introduction of the Government's 'Standard Method' of calculating local housing need in relation to the emerging local plan. Lodge Hill, as the largest site (up to 2,000 homes) in the HPRT allocation, would make a substantial contribution to satisfying this figure, including some 500 affordable homes.
- 11.7 Turning to the sustainability of the proposed Lodge Hill development, this is discussed below in relation to the three dimensions of sustainability:
- 11.8 **Economic** – the proposals will result in significant direct and indirect employment in the construction phase and permanent jobs in the retail, employment and school uses on the site. The new residents will provide increased retail spend and the provision of housing will contribute to job growth and hence local economic growth. These benefits will accrue largely to Medway and, to some degree, more widely. Given that the site is currently unused and derelict, there would be no economic dis-benefit.
- 11.9 **Social** – Medway has, in recent years suffered a substantial shortfall of affordable and market housing against identified need. The Lodge Hill scheme will make a significant contribution towards meeting housing need in the Borough, a major social benefit. The proposals will also provide a primary school, local services and facilities in the village 'hub' and elderly persons accommodation. These facilities will enhance services provision available in Chattenden Village which is poorly served at present there would be a significant contribution to the social dimension of sustainability.
- 11.10 **Environmental** – Homes England's proposals will result in c.80% of the site being used for open space and nature conservation areas. This is a remarkably high figure. Nevertheless, the biggest challenge faced by the regeneration of Lodge Hill is the proposal to build on part of the SSSI. This is necessary to facilitate the delivery of a scheme that can fund and catalyse the comprehensive regeneration of the site. A more limited scheme as suggested in three of the Council's Regulation 18 Local Plan development scenarios will not meet this objective.
- 11.11 The SSSI has been designated for three primary features; nightingale, ancient woodland and MG5 grassland. A comprehensive nature conservation strategy has been drawn up to address any harm to the SSSI that will stem directly and/or indirectly from the proposals. All of the ancient woodland will be retained and buffered; any designated grassland affected will be replaced within the site and impacts mitigated accordingly. The strategy will limit, as far as practicable, impacts on the nightingale, but the

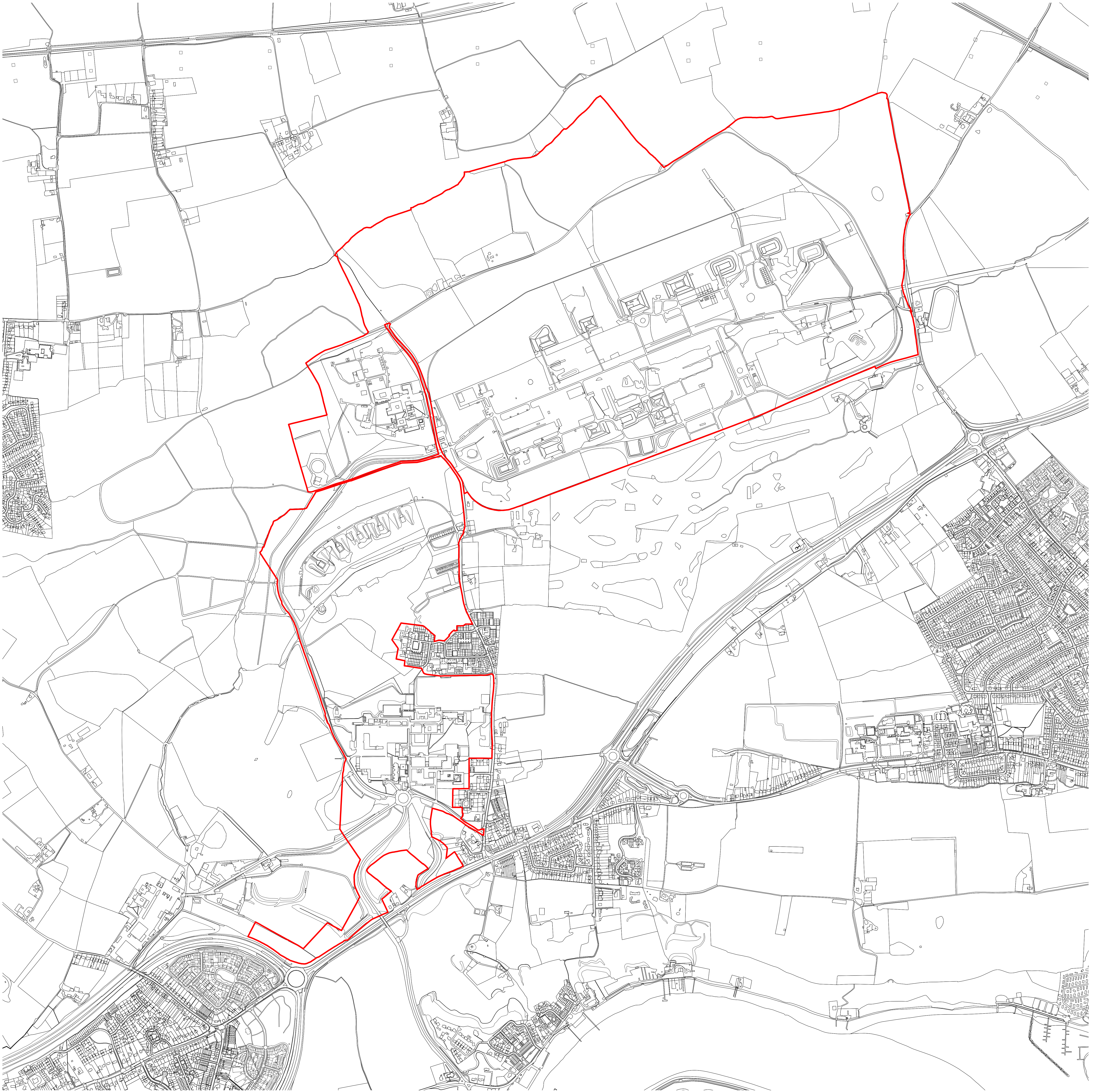
- urbanisation effects will result in the loss of some of the population. These impacts have been evaluated and discussed with Natural England. To mitigate this loss, new nightingale habitat will be provided adjoining the existing areas, together within the proportionate provision of off-site Nightingale Compensation Land within the bird's core range in the UK. Homes England believes that this approach would reflect NPPF policy and whilst clearly, there will be adverse impacts on the SSSI, overall, there will be an biodiversity net gain in the longer term.
- 11.12 In terms of **place-making**, a key objective of the emerging Local Plan, it is inconceivable that the HPRT could proceed without Lodge Hill forming a key component of the allocation. To ignore the early regeneration of the site would be contrary to the orderly and proper planning of the area. Homes England has drawn up a draft Vision and Masterplan to demonstrate how Lodge Hill could come forward as an integral part of the HPRT, which will reflect the Council's proposed Hoo Rural Town Development Framework. These proposals are compelling, particularly when the alternative is considered, namely a deteriorating and unproductive site, which is a health and safety hazard to the local community and would cost the public sector significant funds to maintain and keep secure in perpetuity.
- 11.13 It is Homes England's contention that the allocation of Lodge Hill in the emerging Local Plan for up to 2,000 homes as part of a comprehensive regeneration scheme would be sustainable development overall, and net gains will result across each of the three dimensions; economic, social and environmental.
- 11.14 Homes England is committed to the regeneration of the site and believes that to facilitate this process, it is critical that Lodge Hill is included within the Council's Regulation 19 Local Plan as an integral part of the HPRT allocation. Homes England intends to collaborate fully with Medway Council and other key stakeholders to ensure that this Government priority is progressed at pace and with the scale necessary to achieve the objective of comprehensive regeneration that Lodge Hill badly requires.
- 11.15 It is considered that having regard to the Development Plan and other material considerations, the overall balancing exercise is firmly in favour of a Local Plan allocation at Lodge Hill for up to 2,000 homes, together with supporting uses and infrastructure.



# Appendix I

## Lodge Hill Site Boundary and Homes England Ownership



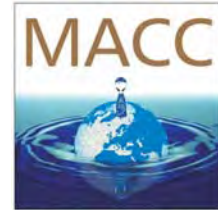


Map Key:  
Site boundary



## Appendix II

### Letter from MACC International



MACC International Ltd, Camilla Court, Nacton, Ipswich, Suffolk, IP10 0EU, UK

To: Jason Hobbs  
Senior Specialist  
Strategic Land Team  
Homes England  
Eastbrook,  
Shaftsbury Road, Cambridge CB2 8BF

Your Reference:

Our Reference: 4969/18

Dated: 27th March 2018

**Re: Addressing Risks Associated with Unexploded Ordnance (UXO) at Lodge Hill Camp/Training Area and Environs**

**1. Brief Site History**

- 1.1. The 'Site' has been in use by the military since 1875 when a barracks and magazines were constructed linked to the military site at Upnor by a narrow-gauge railway. It was subsequently a Naval Munitions Storage and Preparation Area before being used as a training facility for the Royal Engineers and other agencies. Prior to its closure, Lodge Hill Camp (LHC) was the home of 33 Engineer Regiment (EOD), the Defence Explosive Ordnance Disposal School (DEODS) and in later years the combined Ministry of Defence/Home Office sponsored National Search Centre (NSC).
- 1.2. During its active lifetime, Lodge Hill Training Area (LHTA), was used for a wide range of training and purposes including live explosive demolitions.
- 1.3. It is known that a large number of inert bombs, weapons and other munitions were positioned across the Lodge Hill Training Area and Lodge Hill Camp (including within ponds and buildings) for use in EOD/Search training exercises. Some items were purposefully hidden to be difficult to find. Several were buried at significant depth (c.a. 7.0m) for use in deep bomb detection training particularly within the fence of Lodge Hill Camp. Some of the items used in testing and training were 'live'. It is also known that highly inflammable items named - Number 76 Self Igniting Phosphorus Grenades were stored on the site following the Second World War. It is these objects that provide the primary dangers to visitors. This legacy, together with other forms of contamination, will require significant remediation prior to development being carried out and/or public access permitted to the site.

**2. Previous site UXO Clearance**

- 2.1. It is acknowledged that some degree of search was completed previously by the military. However, UXO Clearance Certificates were not provided for the land that was searched and no other records exist to verify the locations of munitions etc. within the site. Although some items were removed, this was not undertaken on a systematic or recorded basis.

## **Level of Risk**

- 2.2. It is considered by MACC International Limited, that further to the historical information gleaned and the subsequent walkover surveys carried out by MACC International Limited, that the level of risk to human safety and well-being on this site from an uncontrolled encounter with unexploded ordnance is significant and a higher risk than that normally encountered on former MOD training establishments of this type.

### **3. Risk to The General Public (Including Tenants & Licensees)**

- 3.1. Although some parts of the site are currently fenced off, the potential risk associated with public access to potential danger areas cannot be overstated mindful that UXO poses a significant risk to public safety. The proposal for a Hoo Rural Town of c.7,500 homes, which includes this site, will exacerbate the level of risk because of the increased population in the vicinity, making site regeneration a significant priority in order to protect public safety.

### **4. Risk to Statutory Providers & Construction Personnel**

- 4.1. Construction methodologies utilised during development are expected to be varied, with the envisaged need to carry out extensive high impact geotechnical, demolition of structures, enabling and main construction excavation works.
- 4.2. UXO by its very nature has the potential to explode if subjected to one or more stimuli including handling; and therefore, the risk to construction teams is again significant and will be subject to a strict set of procedures

### **5. Site Clearance and Mitigation**

- 5.1. Regardless of the eventual use of the site, and whether or not development takes place; it remains apparent that given the known UXO risks on site, the land cannot reasonably be left in its current state given major health and safety concerns
- 5.2. Therefore, adequate risk mitigation, in line with current guidelines and safety legislation on UXO should be carried out.
- 5.3. Methodologies of UXO clearance are varied but it is expected that a combination of visual clearance and inspection, Non – intrusive UXO survey, and watching brief elements are likely to be needed. Pre-clearance to reduce the current risk level and the need to provide certification prior to any planned development should be considered as essential.
- 5.4. If UXO mitigation were to take place based on a reasonable and practicable approach with reliance certification in place post mitigation, then it is considered by MACC International Limited that the phased remediation of the Lodge Hill area, coupled with the provision of significant housing to contribute towards local housing needs in Medway district is wholly achievable. Such remediation could also be designed to limit disruption to important habitats, enabling an appropriate balance to be achieved between critically important site regeneration and housing development, and the protection of key conservation interests.



Carl Percival  
Support Manager  
MACC International Ltd

# Appendix III

## Homes England Outline Nature Conservation Strategy

### Including Figures



Homes  
England

wood.

Lodge Hill, Chattenden

# Outline Biodiversity Conservation Strategy



# Contents

---

<b>1.</b>	<b>Introduction</b>	<b>4</b>
1.1	Purpose of this report	4
1.2	Core principles	5
<b>2.</b>	<b>Chattenden Woods &amp; Lodge Hill SSSI</b>	<b>6</b>
2.1	Reasons for SSSI designation	6
2.2	Current SSSI restoration and maintenance works	7
2.3	SSSI management plan	7
2.4	Grazing regime	8
<b>3.</b>	<b>An ecologically influenced masterplan</b>	<b>9</b>
<b>4.</b>	<b>On-site habitat creation and mitigation</b>	<b>10</b>
4.1	Habitat creation proposals	10
4.2	Nightingale mitigation strategy	10
4.3	Grassland improvement strategy	11
4.4	Woodland access management strategy	12
<b>5.</b>	<b>Strategic approach to mitigation</b>	<b>14</b>
5.1	Hoo Rural Town and the SSSI network	14
5.2	Strategic nightingale mitigation strategy	15
<b>6.</b>	<b>Off-site nightingale habitat compensation</b>	<b>16</b>
6.1	Determining site suitability	16
6.2	NCL delivery strategy	17
6.3	Early habitat establishment to address temporal lag	18
<b>7.</b>	<b>Biodiversity net gain</b>	<b>19</b>
7.2	Biodiversity impact accounting metric	19
7.3	Net Gain Objectives and Opportunities	20
	Objectives	20
	Opportunities	20

**Figures:**

Figure 2.1	Chattenden Woods & Lodge Hill SSSI	After Page 6
Figure 2.2	SSSI grassland restoration strategy	After Page 7
Figure 2.3	Chattenden Woods & Lodge Hill SSSI – Site units	After Page 8
Figure 4.1	Habitat creation proposals	After Page 9
Figure 4.2	Woodland access management strategy	After Page 10
Figure 5.1	Hoo Rural Town allocations and SSSI network	After Page 12

# 1. Introduction

## 1.1 Purpose of this report

- 1.1.1 Homes England is proposing to submit a planning application for the construction of up to 2,000 homes at Lodge Hill, Chattenden (hereafter referred to as the Lodge Hill site). The development will also include a new primary school and extensive green infrastructure. The delivery of the proposed Lodge Hill development will include the implementation of an extensive remediation programme to address the significant health and safety concerns associated with the military legacy of unexploded ordnance and hazardous substances. The proposed development will also include the delivery of an Outline Biodiversity Conservation Strategy, which is the subject of this report. The Strategy has been prepared on behalf of Homes England in response to Medway Council's (MC's) Local Plan Development Strategy (LPDS) Regulation 18 Consultation (March 2018).
- 1.1.2 The Strategy addresses the direct and indirect effects of the proposed Lodge Hill development on biodiversity conservation interests, chiefly the Chattenden Woods & Lodge Hill Site of Special Scientific Interest (SSSI).
- 1.1.3 The Strategy comprises the following chapters:
- **Chapter 2: SSSI restoration and management** – this chapter outlines the strategy for advance habitat restoration works on the Chattenden Woods & Lodge Hill SSSI and the development of a long term SSSI management plan.
  - **Chapter 3: Ecologically influenced masterplan** –this chapter outlines the ecological design principles and assumptions relating to the proposed Lodge Hill development, which have informed the preparation of the masterplan.
  - **Chapter 4: On-site habitat creation and mitigation** – this chapter outlines the habitat creation proposals and strategies for mitigating the effects of the proposed development to SSSI interest features, namely nightingale, grassland and ancient woodland.
  - **Chapter 5: Strategic approach to mitigation** – this chapter outlines proposals for addressing cumulative effects to the wider SSSI network across the Hoo peninsula as well as, effects to Chattenden Wood & Lodge Hill SSSI.
  - **Chapter 6: Off-site nightingale habitat compensation** – this chapter outlines the process for identifying suitable 'nightingale compensation land' (NCL), securing those NCL sites that are needed to compensate for the loss of nightingale habitat at Lodge Hill and early habitat establishment on these sites.
  - **Chapter 7: Biodiversity net gain** – this chapter outlines biodiversity offsetting and biodiversity net gain objectives and opportunities.

## 1.2 Core principles

1.2.1

The core principles that underpin the outline Biodiversity Conservation Strategy that is set out in this document, are as follows:

- Ensure that all management and enhancement opportunities within the SSSI are identified and implemented through the development of an SSSI management plan, such that interest features can, wherever possible, be restored to favourable condition.
- Ensure the application of the following mitigation hierarchy with respect to development proposals within the SSSI:
  - Where possible, avoid damage to areas of high nature conservation interest, chiefly SSSI interest features and protected species.
  - Where adverse direct and indirect effects to features cannot be avoided, appropriate and effective mitigation will minimise detrimental effects to interest features.
  - Where residual effects cannot be fully mitigated, compensatory measures equivalent in type and condition will be adopted to offset effects.
- Ensure that risks and uncertainty relating to the delivery of compensatory offsets are appropriately addressed, through the application of robust evaluation, good practice and expert opinion.
- Deliver a measurable net gain legacy through long term benefits both on and off-site, contributing towards nature conservation priorities at local, regional and national levels.

## 2. Chattenden Woods & Lodge Hill SSSI

### 2.1 Reasons for SSSI designation

2.1.1 Chattenden Woods and Lodge Hill SSSI (Figure 2.1) lies on the Hoo Peninsula in north Kent, north-east of Rochester. The site comprises a mosaic of habitats, including long-established semi-natural woodland (areas of which are recorded as ancient semi-natural woodland), dense scrub and neutral grassland. The area of Lodge Hill and Chattenden Woods SSSI is 351 ha.

2.1.2 The full notification<sup>1</sup> of the SSSI is as follows:

*Chattenden Woods and Lodge Hill SSSI comprises a mosaic of habitats, including ancient and other long-established semi-natural woodland, scrub, and neutral grassland. It is a nationally important site specifically by reason of the following biological features of special interest that occur within and are supported by the wider habitat mosaic: ancient and long-established semi-natural woodlands, predominantly of the National Vegetation Classification (NVC) type W10 pedunculate oak *Quercus robur* - bracken *Pteridium aquilinum* - bramble *Rubus fruticosus* woodland; unimproved neutral grassland of the nationally scarce NVC type MG5 crested dog's-tail *Cynosurus cristatus* - common knapweed *Centaurea nigra* grassland; and breeding nightingales *Luscinia megarhynchos*.*

Specific reference to the importance of the SSSI for nightingales is as follows:

*The SSSI supports a nationally important number of nightingales *Luscinia megarhynchos* during the breeding season. Nightingales use scrub and coppice woodland throughout the SSSI. The extensive areas of woodland and scrub within the site will help to ensure that there is always sufficient area of habitat at a suitable stage of maturity to support breeding nightingales in nationally important numbers.*

*The SSSI comprises a mix of habitat types. In summary, Chattenden Woods comprises an area of largely mature deciduous woodland. Most of the ex-MOD land is a complex mosaic of scrub of different ages and species composition, scattered wet depressions, pockets of mature deciduous woodland, and areas of both hardstanding and sandy-based substrates that are an artefact of previous military training operations. A belt of MG5 grassland separates this vegetated area from dense scrub and deciduous woodland on a northward-facing slope at Rough Shaw and adjacent wooded areas. The habitat characteristics are described in more detail below, as per SSSI citation.*

*Woodland: The extensive woodland represents one of the best examples of coppice-with-standards woodland on the London Clay, though most of the area has not been recently worked as active coppice. The woodland is largely comprised of pedunculate oak *Quercus robur* standards with ash *Fraxinus excelsior* coppice of varying age structure. Other trees include field maple *Acer campestre*, hornbeam *Carpinus betulus* and wild cherry *Prunus avium*. The non-native sweet chestnut *Castanea sativa* is infrequent across the site.*

*The shrub layer is varied with hazel *Corylus avellana* and hawthorn *Crataegus monogyna* generally predominant but with other species such as silver birch *Betula pendula*, aspen *Populus tremula*, willow *Salix* spp., wayfaring-tree *Viburnum lantana* and the scarce wild service-tree *Sorbus torminalis* also present. The field layer of the woodland is dominated by bluebells *Hyacinthoides non-scripta*, with bramble *Rubus fruticosus* and other climbers, particularly dog-rose *Rosa canina* and honeysuckle *Lonicera periclymenum*. Several scarce plants are present including the early-purple orchid *Orchis mascula*, broad-leaved helleborine *Epipactis helleborine* and stinking iris *Iris foetidissima*.*

<sup>1</sup> <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/2000764.pdf>

*Grassland: Rough Shaw is an area of dense and scattered scrub of hawthorn, gorse Ulex europaeus and brambles on a north facing slope, with tall-herb neutral grassland along its upper margin. The tall-herb neutral grassland includes stands of unimproved neutral grassland. Typical herbaceous species present and that are typical of this grassland type include lady's bedstraw Galium verum, common knapweed Centaurea nigra, common bird's-foot-trefoil Lotus corniculatus, meadow vetchling Lathyrus pratensis, agrimony Agrimonia eupatoria and red clover Trifolium pratense. Three fields in the north of the Lodge Hill Training Area include more extensive areas of unimproved neutral grassland of a similar nature to the stands at Rough Shaw. These areas represent semi-natural grassland on base-rich London Clay. A notable occurrence in all three fields is dyer's greenweed Genista tinctoria, a species associated with unimproved meadows, pastures and heaths*

- 2.1.3 In addition to the 'reasons for notification' described above, the site also supports a range of woodland and scrub breeding birds, bats, reptiles, great crested newts and invertebrates.

## 2.2 Current SSSI restoration and maintenance works

- 2.2.1 Due to the fact that most of the Chattenden Woods & Lodge Hill SSSI (under Homes England's ownership) has not had any meaningful management for a significant length of time, Homes England has applied to Natural England to secure assent for restoring under-managed habitats (chiefly lowland grassland) to favourable condition. To this end, vigorous regeneration of thorny scrub is being cleared from under-managed areas of MG5<sup>2</sup> grassland through a programme of grass-topping and cattle grazing (Figure 2.2). Nightingale habitat enhancement opportunities are currently being explored with Natural England; prescriptions are discussed in Section 2.2.
- 2.2.2 Homes England has also begun a programme of essential estate management grounds maintenance, which has included vegetation clearance around security buildings, perimeter fencing etc. All vegetation clearance works have been screened for ecological constraints and where necessary works have been undertaken under the supervision of an ecological clerk of works.

## 2.3 SSSI management plan

- 2.3.1 An SSSI management plan is being developed by Homes England in consultation with Natural England. The aim will be to establish a management regime for all areas of SSSI under Homes England's ownership. The design of this regime will be informed by a single overarching management plan, which outlines the objectives, management actions and commitments that apply to all landowners across the eight habitat units that make up the SSSI (i.e. not only Homes England). Currently there are two existing management documents prepared by other SSSI landowners: a Site Management Statement prepared for land within Chattenden Wood under the ownership of Chattenden Syndicate Ltd; and a Woodland Management Plan prepared for Berry Court Wood under the ownership of Bridge Woods Field Archery Club.
- 2.3.2 Management proposals for Home's England's SSSI land are being designed with the objective of ensuring that the SSSI's grassland and woodland will be restored and enhanced wherever possible and that habitat creation and management opportunities will be delivered across the SSSI with the objective of increasing the nightingale population.
- 2.3.3 Management measures will be broadly the same type as those outlined in Natural England's *Views about Management for Chattenden Woods & Lodge Hill SSSI*<sup>3</sup>. However, in addition, opportunities

<sup>2</sup> As classified under the National Vegetation Classification (NVC).

<sup>3</sup> <https://designatedsites.naturalengland.org.uk/PDFsForWeb/VAM/2000764.pdf>

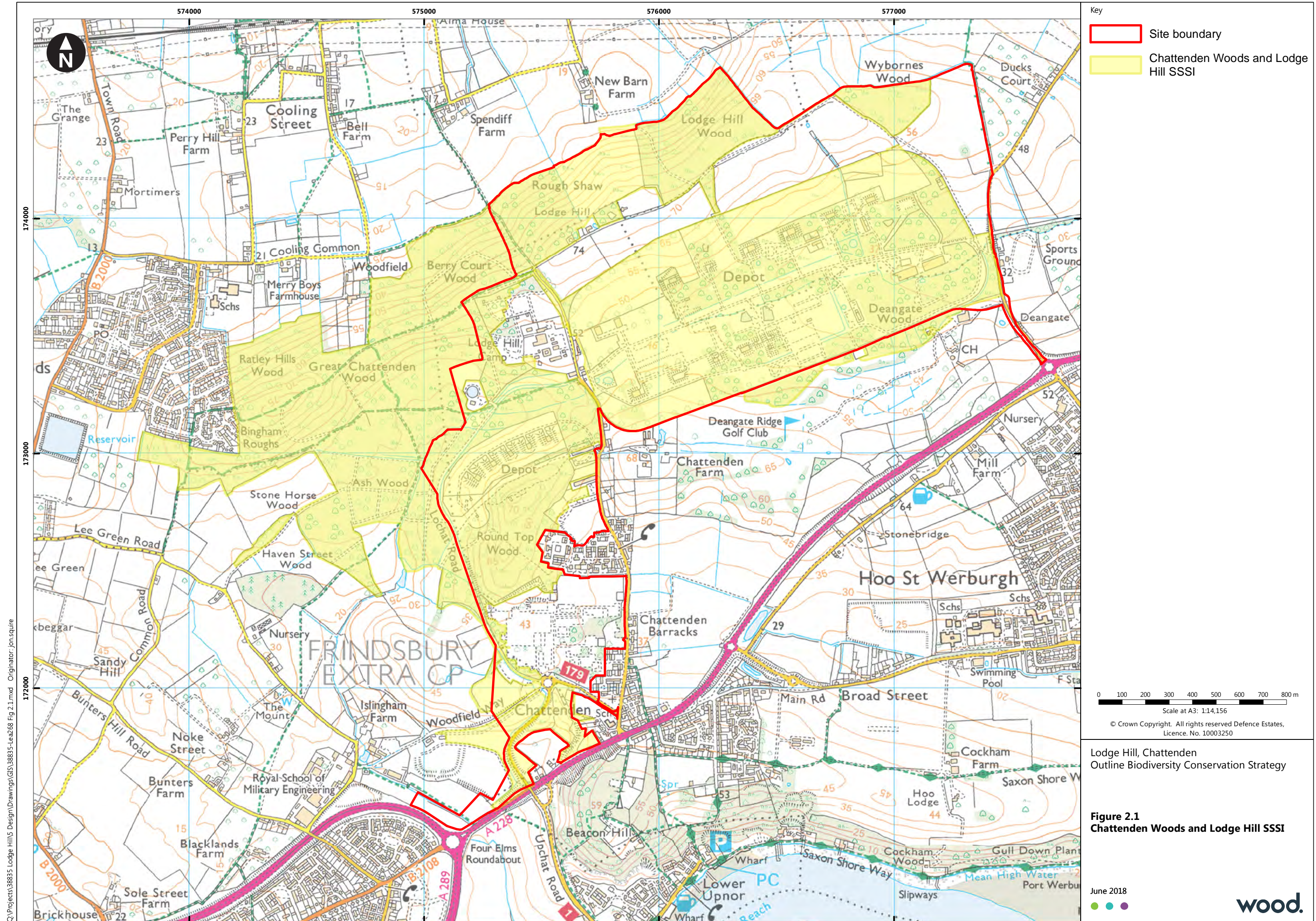
will be explored to enhance SSSI condition above and beyond what's included in this strategy document.

- 2.3.4 SSSI Units (Figure 2.3) have been evaluated based on their conservation interest, and management aims and objectives will be set based on the interest features within each unit.
- 2.3.5 The SSSI Units will then be broken down into manageable-sized compartments where, subject to the habitat types and objectives set, specific management actions will be delivered. Proposals are likely to incorporate a combination of initial restoration management and longer term on-going management and maintenance, subject to development of a compatible UXO clearance strategy:
- Programme of grassland restoration (clearance of bramble, thorny scrub and creeping thistle);
  - Sward diversification by spreading species-rich green hay;
  - Mulching/opening up young plantations to allow scrub regeneration;
  - Woodland re-wetting – creation of foot-drains and drain-blocking,
  - Sensitive management of ancient woodland – thinning, scalloping, reinstatement of coppicing, glade creation and opening corridors;
  - Development of access management strategies, particularly in Chattenden Woods.
  - Maintenance of dense scrub and habitat mosaics, and sensitive grading of scrubby edges with rotational coppicing and layering to allow continuous provision of nightingale habitat;
  - Maintenance of high value brownfield land comprising built areas, including spoil and imported substrates.

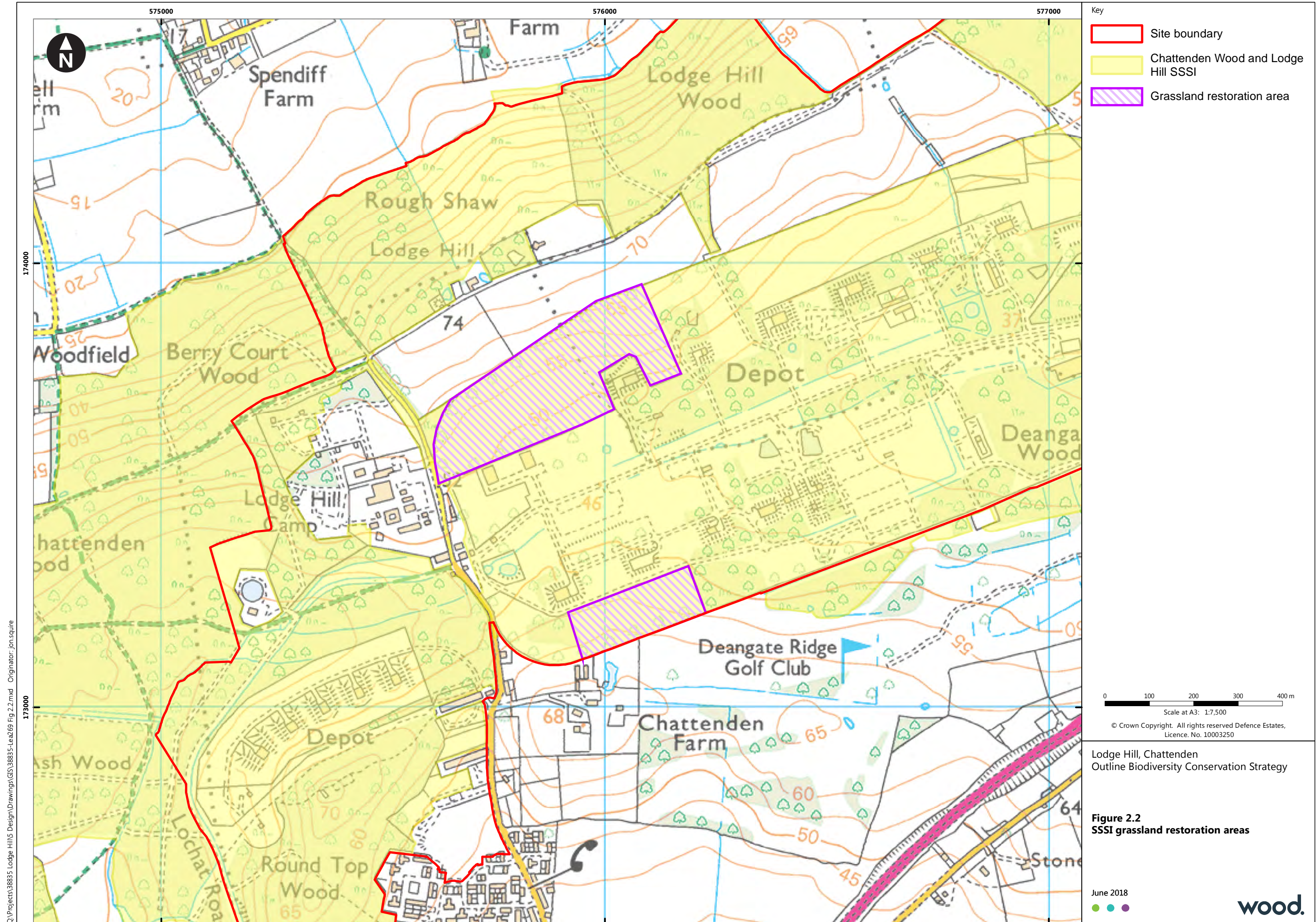
## 2.4 Grazing regime

- 2.4.1 Coupled with the management proposals outlined above, the long-term aspiration is to establish extensively managed cattle grazing across the enclosed areas in order to maintain the Chattenden Woods & Lodge Hill SSSI's complex grassland and scrub dynamic.
- 2.4.2 The primary objective of the grazing would be to manage the land for biodiversity enhancement conservation purposes. The choice of livestock for conservation grazing across the site is being considered, but could involve traditional, hardy breeds of sheep, goats, cattle and ponies. The choice of breeds and stocking density will be important in maintaining a mosaic of habitat across the site, with an appropriate balance of scrub expansion and maintenance of open grassland swards.
- 2.4.3 A separate grazing regime may be necessary across areas of MG5 grassland, which may require hay meadow management (with a hay cut typically in early July) and late summer/autumn aftermath grazing); or pasture management by cattle.
- 2.4.4 Consultation with Natural England on the development of a grazing strategy for the site is ongoing.

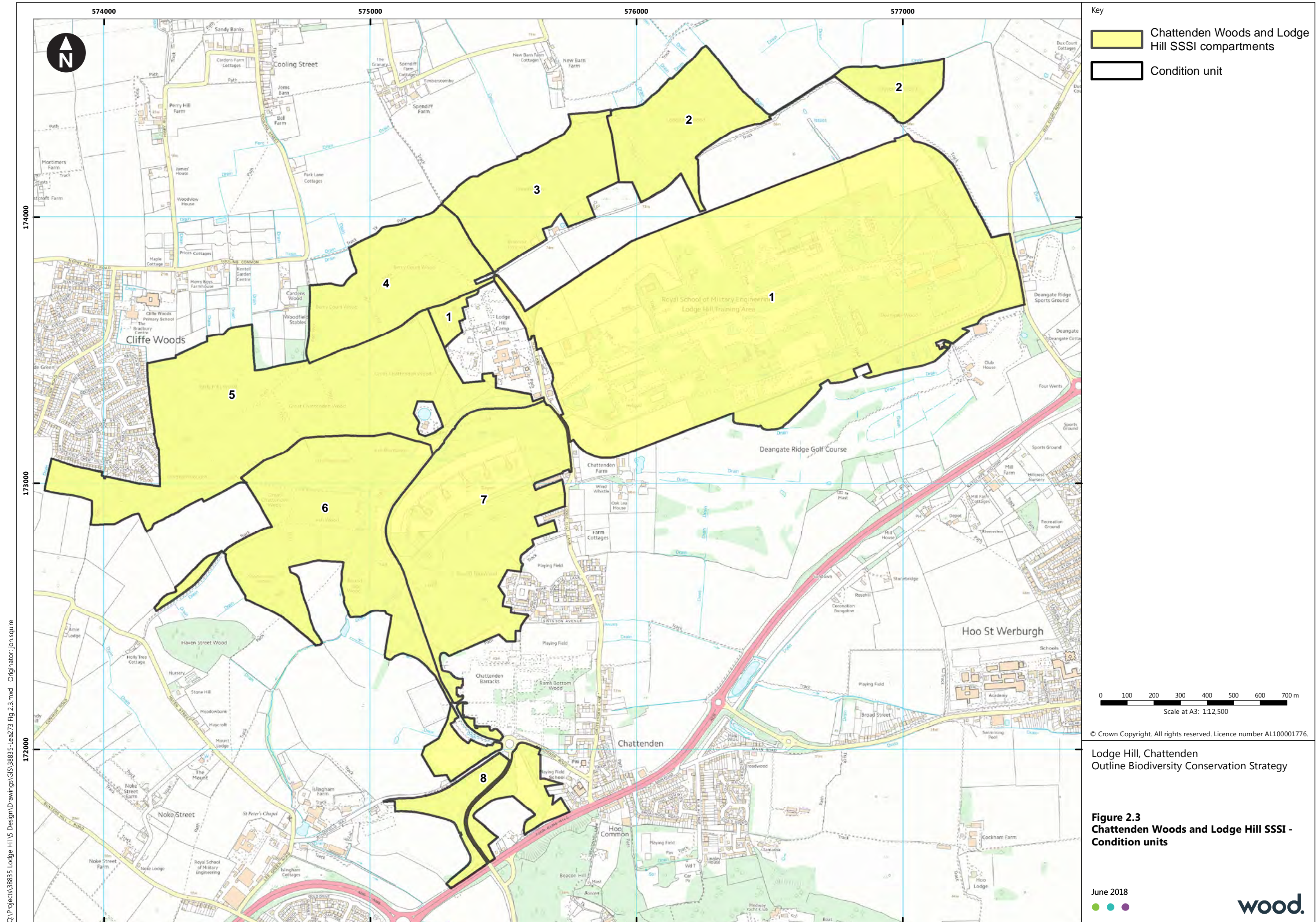














### 3. An ecologically influenced masterplan

- 3.1.1 The development of the Lodge Hill masterplan has been informed by a detailed evidence base collected by Homes England following an extensive baseline survey programme and initial impact assessment modelling. This information has been used to assess the implications of the potential development on the ecological interests feature of the site, which reflects a new strategy to address biodiversity conservation.
- 3.1.2 Key considerations and assumptions regarding the design and implementation of the proposed development comprise the following:
- All land outside the development footprint to the east of Lodge Hill Lane (including SSSI and non-SSSI land) will be secured as a 'conservation area' in perpetuity, designed to enhance nightingale habitat, enhance other SSSI features and benefit protected and notable species.
  - Robust exclusion fencing incorporating appropriately designed overhangs will be installed around the conservation area to exclude access to the public as well as cats. Regular inspection and maintenance will be vital to ensure continued exclusion of cats in the long term, as well as from a health and safety perspective until UXO clearance has been completed.
  - All ancient woodland will be retained and managed stand-off areas will be provided.
  - Development within core areas of nightingale interest has been avoided.
  - SSSI grassland fields will be retained restored within the conservation area and/or will be incorporated as natural greenspace.
  - Boundary treatments will incorporate sensitive lighting and landscape design and effective naturalised screening.
  - Landscape and lighting strategies will incorporate green corridors, which will remain dark, and bolster tree lines and site boundaries, which will deliver effective wildlife commuting corridors within and around the Lodge Hill site.
  - Core habitats and foraging areas for protected or notable species will be retained and opportunities for habitat enhancement will be implemented; this would take into account the temporal lag between habitats being cleared and the growth of new/replacement habitats.
  - An access management strategy will be developed for the Lodge Hill site and immediate environs. The content of this strategy will be guided by ecologically-informed masterplanning and sensitive management proposals, with the aim of reducing recreational pressure in areas of biodiversity value, notably SSSI/ancient woodland areas.
  - Replacement bat habitat (for example purpose-built structures, and/or provision of bat-friendly access points within new buildings) will be provided within areas close to roosts lost to development. They will be designed to emulate the characteristics of the roosts that will be lost.
  - Water bodies and terrestrial habitat for great crested newt will be protected wherever possible. Additional waterbodies and terrestrial habitat will be created on non-SSSI land with the objective of ensuring the maintenance of the favourable conservation status of great crested newt.
  - High value invertebrate habitat will, where possible, be retained or if necessary translocated, with habitats that are lost being recreated within nearby non-SSSI land, with the objective of maintaining and, where possible, enhancing the invertebrate value of the site.

## 4. On-site habitat creation and mitigation

### 4.1 Habitat creation proposals

4.1.1 An on-site habitat creation and mitigation strategy is being developed across two areas (Figure 4.1):

- Approximately 48 ha of non-SSSI land (currently pasture fields) located to the north of the ex-training area, which will help offset direct and indirect effects to SSSI features (nightingale and MG5 grassland), as well as providing a complex of habitats that strengthens connectivity for bats, birds, great crested newt, reptiles, badgers and invertebrates.
- Land within Islingham Farm is being considered for ecological mitigation and enhancement, which (subject to the approval of the Royal School of Military Engineering [RSME] and the Defence Infrastructure Organisation [DIO]) could provide habitat creation and enhancement areas for a variety of protected and notable species such as great crested newt, reptiles, invertebrates and bats.

4.1.2 The current outline strategy involves the following:

- Creation of up to 12ha of MG5 grassland;
- Creation of up to 4ha of MG5 grassland/scrub mosaic;
- Creation of up to 18ha of dense scrub thicket and scrub/grassland mosaic;
- Creation of up to 4 – 6ha of damp rush/tussocky grassland;
- Creation of up to 1,000m of new hedgerow and bolstering existing gappy hedgerows;
- Creation of a complex of waterbodies and field drains;
- Translocation of brownfield substrates and spoil from the development footprint; and
- Enhancement of existing shelterbelts and the creation of new vegetated corridors, which are designed to merge sensitively with existing habitats.

### 4.2 Nightingale mitigation strategy

4.2.1 A nightingale mitigation strategy has been developed, which acknowledges the adverse effect of the proposed Lodge Hill development on the SSSI's nightingale population. The primary aim is to ensure that a viable population of nightingale will be retained within the SSSI, whilst maintaining or, where possible, enhancing other important biodiversity features (e.g. ancient woodland, neutral grassland, protected and notable species etc.).

4.2.2 The key objective is to improve existing habitats through management and create additional high-quality nightingale habitat by planting hedgerows, creating foot-drains and enabling natural regeneration. This will strengthen connectivity between core nightingale clusters (in the ex-training area and Rough Shaw), as well as providing enhanced opportunities for habitat creation for nightingale across the rest of the Lodge Hill site.

4.2.3 The retention of a viable nightingale population will also rely on the following measures:

- Sensitive development phasing;

- A long term rotational strategy for UXO clearance within the enclosed conservation area<sup>4</sup>;
- Installation of cat-proof exclusion fencing around the retained conservation area;
- Development of access management strategies and the provision of suitable alternative natural greenspace to encourage visitor use away from the SSSI;
- Development of woodland management measures; and
- Development of appropriate nightingale-specific habitat management across the SSSI.

4.2.4 All such measures will be necessary to enable a core of nightingale territories to persist and act as a stimulus for other territories to establish in adjacent habitats within non-SSSI land.

4.2.5 The predicted residual effect of the proposed Lodge Hill development on the SSSI nightingale population, will be determined with reference to modelling of nightingale territory losses and assessment of the extent of combined direct and indirect habitat losses. A comprehensive assessment of these implications will be informed by the following:

- Confirmation of masterplan design assumptions;
- Confirmation of nightingale habitat creation and mitigation proposals;
- Confirmation of a long term rotational UXO clearance strategy; and
- Clarification as to the scope of developments that are likely to contribute to cumulative indirect pressures (See Section 5.2).

4.2.6 On completion of these elements of work, assessments will be undertaken to determine the full requirement for off-site compensatory land, based on the sites identified as part of the Nightingale Compensation Land Delivery Strategy (see Section 7.1).

### 4.3 Grassland improvement strategy

4.3.1 A programme of grassland restoration is being implemented (see Section 2.1).

4.3.2 Once the masterplan design assumptions are confirmed, the full extent of grassland predicted to be lost or retained will be calculated. The extent of habitat creation and/or translocation to compensate for the areas that will be lost will also be calculated. The latter measures will be designed to ensure that there is no net loss of the overall grassland resource.

4.3.3 A grassland improvement strategy is currently being developed, with the core objective of ensuring that a net gain of SSSI quality MG5 grassland is provided within the Lodge Hill site:

- Masterplan design has ensured that the majority (~17ha) of MG5 grassland can be avoided and retained outside the development footprint, within the retained conservation area;
- Some areas (~6.4ha) of MG5 grassland will be retained within the development footprint as publicly accessible open greenspace;

<sup>4</sup> A rotational strategy for UXO clearance, if undertaken sensitively and in accordance with prescribed recommendations, could offer an opportunity to align clearance with conservation management of the SSSI. This could be achieved by defined areas of scrub being earmarked for UXO clearance at an appropriate time so as to fit with the timing of required conservation management that is designed to improve habitat for nightingales in particular parts of the site. This would need to be undertaken on a gradual basis over an extended period of years in order to ensure continuity of suitable nightingale habitat, thereby maximising the chances of retaining a core population of nightingales.

- All areas (23.4ha) of MG5 grassland within the SSSI are being restored from unfavourable to favourable condition. An SSSI management plan will incorporate a programme of appropriate ongoing grassland management;
- New MG5 grassland (~12ha) will be created within the mitigation area (Figure 4.1) to the north of the ex-training area, to compensate for the potential loss or degradation of grassland within the development footprint. This area (the donor site) has been screened as suitable for creating MG5.
- Habitat creation techniques would include a combination of standard approaches, for example seeding and/or spreading green hay. A full grassland creation and implementation strategy is being developed, which sets out a method of green hay collection, ground preparation and management techniques.
- Early (pre-development) creation of MG5 grassland will allow for site preparation and grassland establishment to be carried out at an early stage, with the objective of delivering a net gain in MG5 grassland within a five to ten-year period.
- In addition, a sensitive phasing strategy will allow construction activity to be concentrated towards the later stages of the Local Plan period (2012 - 2035), ensuring any temporal lag in habitat loss or degradation in quality would be reduced through the establishment of new MG5 grassland in advance of the loss of areas of existing grassland.

## 4.4 Woodland access management strategy

4.4.1 Based on the assumption that all land outside the development footprint to the east of Chattenden Lane will be secured through a perimeter exclusion fence, the scope of an Access Management Strategy will include the following woodland blocks (Figure 4.2), which are likely to be subject to increased recreational pressure as a result of the proposed development:

- Round Top Wood;
- Berry Court Wood;
- Ratley Hills Wood and Bingham Roughts;
- Great Chattenden Wood; and
- Ash Wood, Stone Horse Wood and Ash Plantation.

4.4.2 Management options for these woodlands will be informed by studies of existing recreational use to identify the types and locations of activities that are carried out, frequency of use etc. The data obtained will be necessary to inform appropriate targeting of management activities to different areas of woodland. The scope of such a recreational use (visitor) survey is likely to cover the following:

- the factors which make woodlands at Lodge Hill particularly attractive to different user groups, e.g. is it convenience, accessibility, the landscape, the wildlife, its informality etc;
- an understanding of how different user groups access the woodland, e.g. how they travel (by car, on foot, bike or by horse) and where they enter, e.g. car parks, gated access points, via footpaths etc;
- an understanding of how, when and how frequently different routes are used for different activities, including whether this varies according to the time of year; and

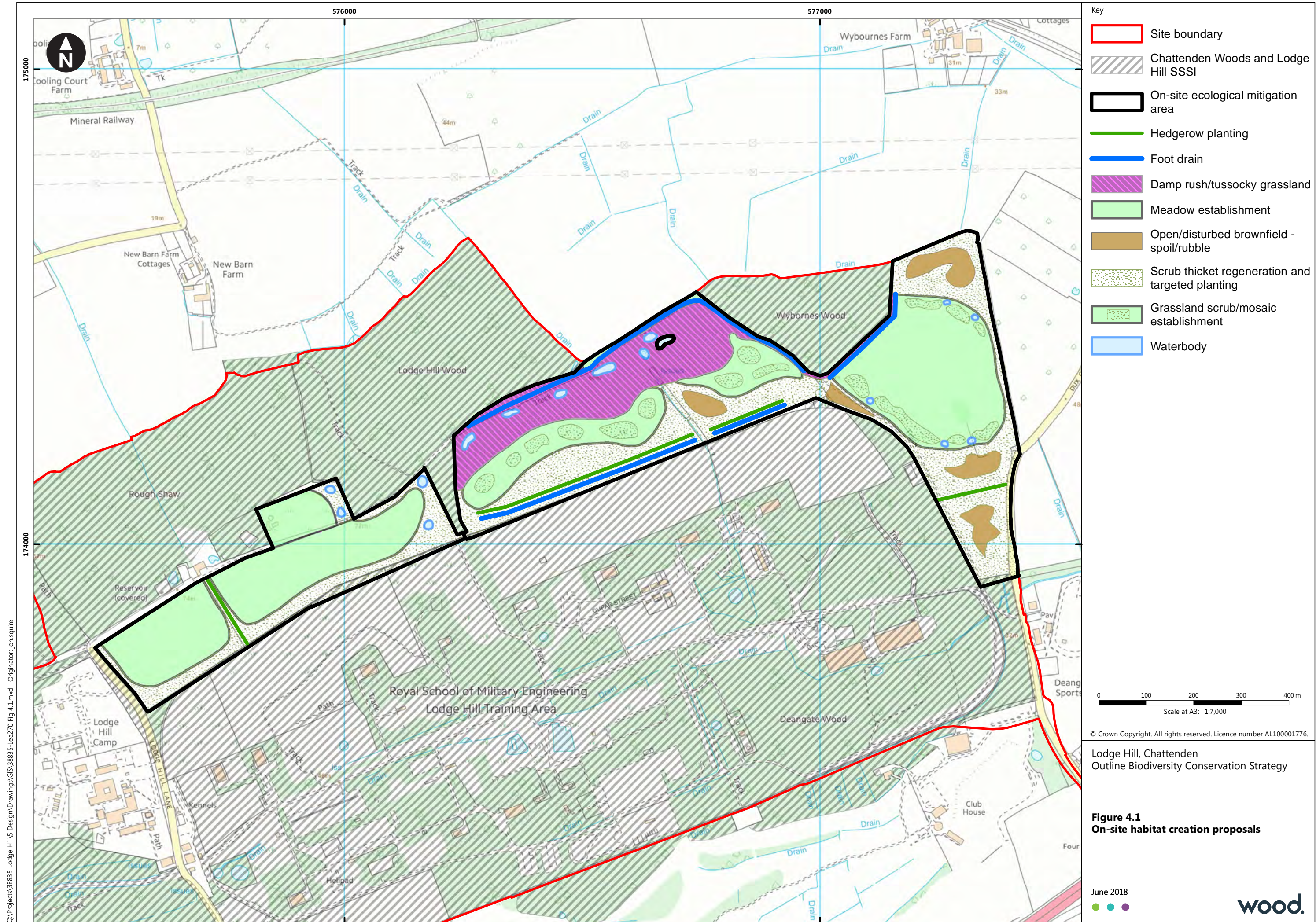
- the origin of both authorised and unauthorised recreational users - for example are the users from the immediate locality and could they therefore, be engaged through local community channels, or are they visitors from further afield in which case different approaches to communication would be needed.

4.4.3 Once a better understanding of recreational use has been established and data have been correlated to observe where key pressures and sensitivities are most apparent, then appropriate management approaches and actions can be devised.

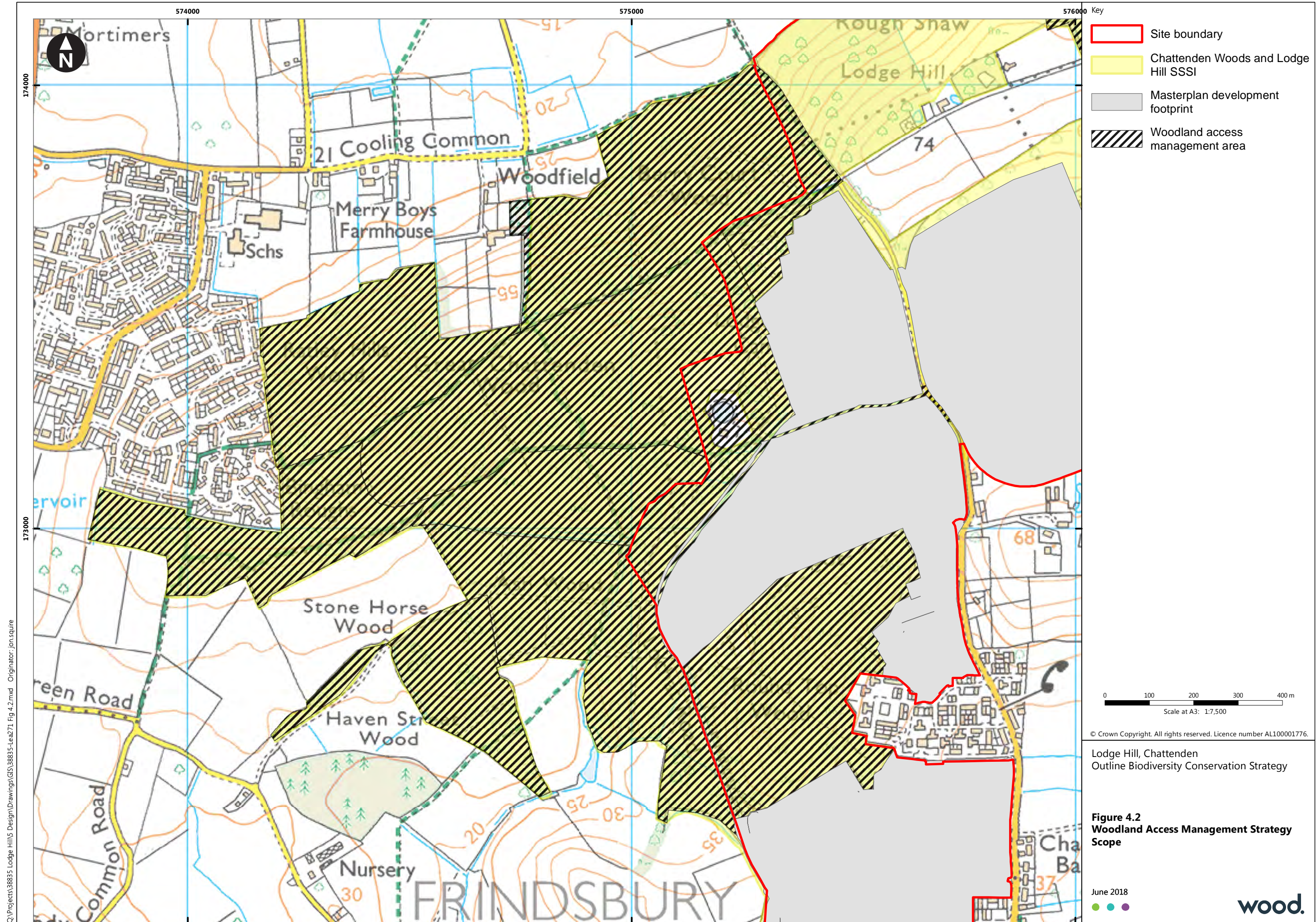
4.4.4 At this stage, based on anecdotal evidence for recreational use and observed effects to the woodland, the following options are likely to require further consideration:

- Create an overall 'Access Management Strategy' to draw together the results of ecological and recreational studies and monitoring, and to set out management measures. Such a document would provide a vehicle for consultation with stakeholders/user groups etc and a mechanism to plan and record actions and monitoring results;
- Identify and liaise with Natural England to ensure that any management interventions are compatible with SSSI requirements and condition monitoring;
- Identify landowners (such as Chattenden Syndicate, Bridge Woods Field Archery Club and the Ministry of Defence) with responsibility for managing the woodland and SSSI interests.
- Involve local residents, users and community groups to increase understanding of the national importance of the site and how proposals for the site can benefit the wider community.
- Establish strategically located access points using signage or interpretation and way-marked routes to divert users away from the most sensitive woodland compartments;
- Provide well-managed woodland areas, which improve the condition of the woodland, and provide attractive and accessible spaces;
- Provide natural greenspace within the development footprint, which diverts users away from SSSI woodland and reduces recreational pressure within the woodland;
- Use dead-hedging and managed regeneration of fast growing vegetation to block routes. Effective measures are coppice re-growth or thorny scrub;
- Provide leaflets and on-line publications about access routes, including the promotion of alternative locations for riding and cycling;
- Provide wardens supported by 'friends of' groups to help monitor the situation and liaise with the police and user groups.
- Design and implement an ecological monitoring programme to measure progress towards the successful restoration of the woodlands' ground flora.











## 5. Strategic approach to mitigation

### 5.1 Hoo Rural Town and the SSSI network

- 5.1.1 The proposals for the development of the Hoo Rural Town involve a number of proposed strategic allocations (Figure 5.1). These will generate a considerable number of additional homes and residents to the area, resulting in a cumulative increase in urbanisation effects and recreational pressures, thereby impacting on the Chattenden Wood and Lodge Hill SSSI and other SSSI's located in the vicinity. To this end, Homes England has begun a dialogue with MC with a view to working together over the development of a strategic framework to address the impact that additional housing development will have on the SSSI network in the vicinity of the proposed Hoo Rural Town.
- 5.1.2 A strategic approach is required to deliver a series of measures to avoid or mitigate adverse effects on the interest features of the SSSIs that make up the network, caused primarily by increasing numbers of recreational visitors. This approach would involve the following:
- Development of a shared understanding of the sensitivities of the nature conservation sites across the Hoo Peninsula;
  - Development of a common evidence base for ensuring standardisation of ecological assessments and of avoidance/mitigation proposals;
  - Development of a strategic approach to green infrastructure across the Hoo Rural Town, building on emerging strategic masterplan designs from applicants of all allocated sites. Tailored green infrastructure proposals need to be developed in tandem with access management strategies that are needed to limit recreational pressures on the SSSI network.
  - Development of a strategic approach to mitigation, which promotes collaborative working and ensures effective joined-up proposals.
- 5.1.3 As a first step, proposals have been made for the agreement of a common standardised evidence base for the local Hoo Rural Town, upon which evaluations and assessments relating to recreational and urbanisation pressures to the SSSI network<sup>5</sup> for each development proposal might be based. This approach should allow for data/information sharing between different developers and the possibility for sharing the costs of data collection.
- 5.1.4 The following scope should be determined and agreement sought between all parties:
- Which developments are likely to result in indirect effects on SSSIs;
  - Which SSSIs should be subject to assessment?
  - Agree requirements for a defined evidence base:
    - ▶ Nightingale data for Chattenden Woods & Lodge Hill SSSI (2012 – 2018);
    - ▶ Nightingale impact assessment approach;
    - ▶ Air quality modelling data;
    - ▶ Traffic modelling data; and

<sup>5</sup> The primary focus would be anticipated to be Lodge Hill and Chattenden Woods SSSI, Tower Hill to Cockham Woods SSSI and Northward Hill SSSI.

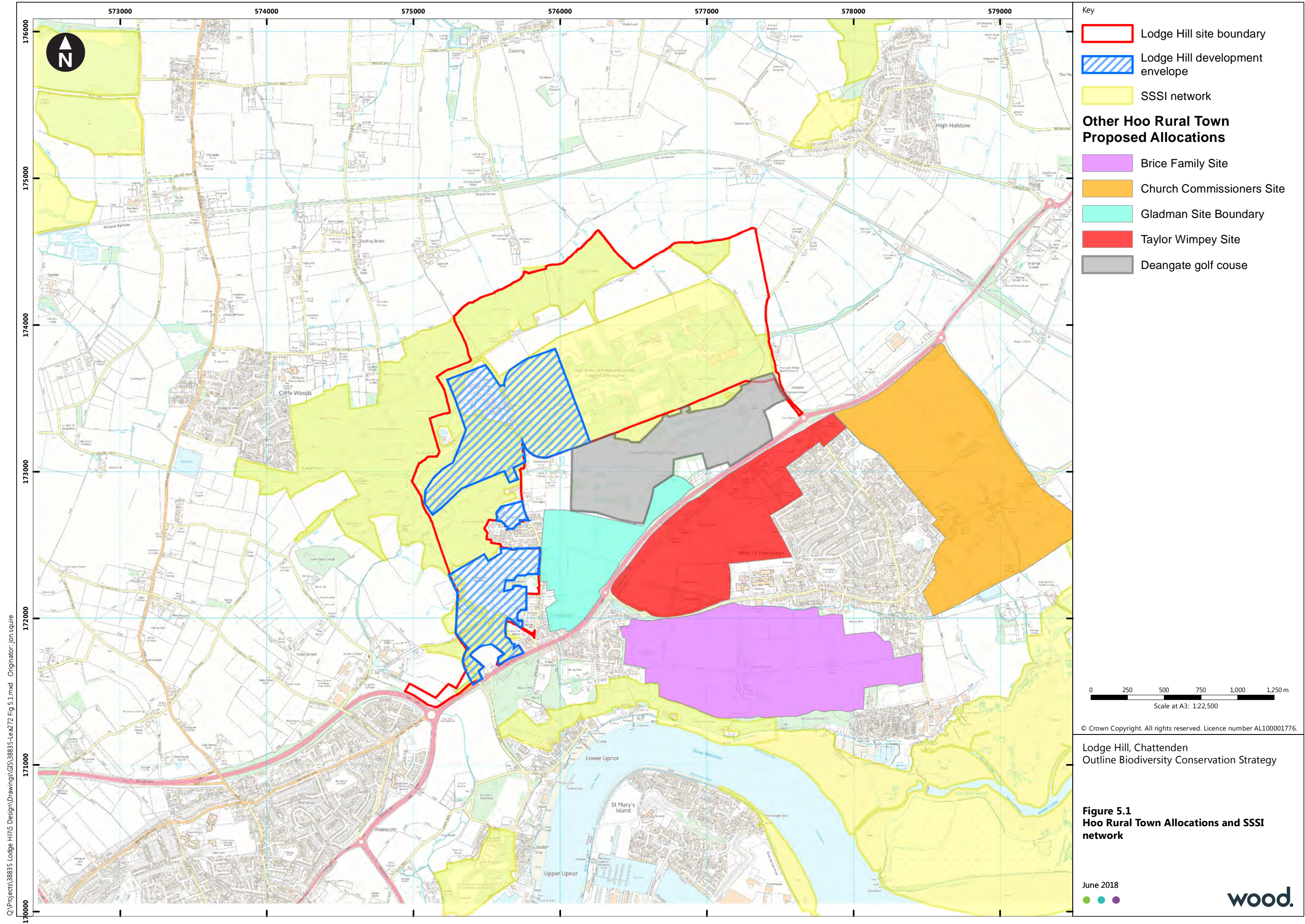
► Visitor survey data

- 5.1.5 Following agreement on the above, it can then be determined what data are currently available, whether they are robust and up to date, and whether new or refreshed data may be required.
- 5.1.6 The above information should be the starting point from which potential cumulative effects to the SSSI network can be assessed, reflecting a process of strategic masterplan design, a strategic approach to mitigation and/or the development of effective compensation.

## 5.2 Strategic nightingale mitigation strategy

- 5.2.1 Several strategic allocations within the proposed Hoo Rural Town lie close to the Chattenden Woods & Lodge Hill SSSI, which supports a nationally important nightingale population.
- 5.2.2 The SSSI and the nightingale population that it supports are likely to be affected by a combination of direct habitat loss (specifically within the Lodge Hill part of the SSSI), as well as indirect pressures associated with increasing urbanisation within the wider area. For instance, each successful planning application is likely to result in an increase (to varying degrees) in urbanisation effects such as cat predation, recreational disturbance, noise and/or light disturbance.
- 5.2.3 On this basis, a strategic approach should be taken with regard to the assessment of effects on the SSSI nightingale population, whereby, for each application within the proposed Hoo Rural Town, consideration should be given to the likely effects on nightingale and an attempt should be made to avoid or reduce them through appropriate design.
- 5.2.4 It is anticipated that sites within the Hoo Rural Town allocated area will be required to evaluate and assess direct and/or indirect pressures of their development proposals on the SSSI's nightingale population both in isolation and cumulatively, and demonstrate that effects can be either avoided or adequately mitigated.
- 5.2.5 This approach will help determine the significance of cumulative pressures on the SSSI, which will inform the need to develop a Strategic Avoidance and Mitigation Strategy to addresses these issues.







## 6. Off-site nightingale habitat compensation

### 6.1 Determining site suitability

6.1.1 Based on the need to deliver appropriate off-site nightingale habitat in order to compensate for the loss of on-site SSSI habitat (both directly and indirectly), an extensive and targeted search has been undertaken to identify nightingale compensation land (NCL) sites.

6.1.2 The following list of site suitability criteria is based upon the criteria that were developed by the BTO (2012)<sup>6</sup> with refinements added by the Wood team (including Chas Holt and Rob Fuller) with respect to the identification of sites suitable for maintaining or restoring nightingale habitats, or creating new habitat designed to attract increased numbers of breeding nightingale:

- **NCL sites should be within the core UK nightingale breeding range:**  
This covers Kent, Essex, East Sussex and West Sussex).
- **NCL sites should be close to an existing population of nightingale:**  
Being in close proximity would serve both as a potential stimulus for migrating birds to settle in a particular area and as an aid to recruitment through audio-connectivity.
- **NCL sites should incorporate the following intrinsic characteristics:**
  - ▶ The NCL should be at low altitude, lower than 40m and ideally below 20m.
  - ▶ Soil moisture content, nutrient level and the presence of 'wet' habitats are important in determining a site's potential to support nightingale habitat and a sufficient biomass of food for nightingale.
  - ▶ The presence of 'wet' habitats or of water bodies, such as ponds and marshy areas, and drainage features such as streams and ditches should positively contribute towards on-site habitat diversity and foraging opportunities for nightingale.
  - ▶ The presence on site (or in the vicinity) of one or more of willow, elder, nettle, blackthorn, bramble and hawthorn is notable because of their association with habitats that can be attractive to nightingales.
- **The NCL should be designed to reflect negative and positive effects associated with adjacent land**
  - ▶ Avoid taking forward NCL sites that are located close to housing developments, which could contribute towards disturbance and predation (notably by cats), with adverse effects on the nightingale population. Alternatively, design the NCL to be buffered from housing developments by land that is not being enhanced for nightingale.
  - ▶ The presence of woody vegetation adjacent to NCL sites (dense hedges, woodland, dense scrub, standard trees or other woody vegetation) is likely to increase the speed at which good quality nightingale habitat develops on NCL sites, by acting both as habitat features that are used by nightingale and sources of seeds for future natural regeneration.
- **Extent of NCL sites**
  - ▶ Larger sites will be prioritised given the advantages relating to:

<sup>6</sup> See Hewson, C.M. & Fuller R.J. [2012]. Factors potentially affecting the viability and success of biodiversity offsetting to compensate for nightingale habitat loss. The BTO, Thetford.

- *Con-specific attraction* i.e. the presence of nightingales already occupying an area could act as an indicator of suitable habitat;
  - *The consideration of edge effects* – smaller habitat areas may exhibit more pronounced edge effects leading to an increased threat of disturbance, predation and fragmentation when compared with a larger area.
  - *Site productivity for nightingales* - it is considered that reproductive output (e.g. pairing success of males) is higher where more birds are present; and
  - *Population sources/sinks considered against a trend of declining numbers* – larger sites in close proximity to population sources offer the greatest opportunities for colonisation, particularly in the context of national population decline.
- **NCL long term management**
    - ▶ NCL should be secured and managed in perpetuity, with the chief purpose to deliver conservation value for nightingale.

## 6.2 NCL delivery strategy

6.2.1 The NCL delivery strategy incorporates the following assumptions:

- A comprehensive suite of potential NCL sites is being considered as potentially contributing towards a final package of NCL. Analyses are currently being undertaken to determine the optimal configuration of the NCL package, which involves assessing 1.) the extent of NCL that can be provided by each site; 2.) intrinsic site quality as determined by expert opinion; and 3.) the risk and uncertainty associated with the length of time for suitable nightingale habitats to establish and for nightingale to colonise.
- Each of the suite of NCL sites that is being progressed is being tested against the site suitability criteria that are listed above, with the objective of identifying the area of land within each site that is suitable for nightingale habitat creation (recognising that only a proportion of each site will be suitable). The sum of the areas of land delivered by each NCL site will equal the total quantum of NCL that is taken forward as part of the strategy.
- Extensive baseline surveys have been undertaken at each NCL site that is being taken forward, including breeding nightingale surveys, extended Phase 1 surveys, winter bird surveys and protected species surveys (where necessary).
- Detailed management plans are being prepared, incorporating illustrative establishment phase (1 – 5 year) plans and long term (5+ year) management plans that could be adapted in response to the findings of site monitoring.
- Land owners of NCL sites are currently involved in negotiations with Homes England. The current approach involves securing options over as many sites as possible, primarily through short term 3-5 year option agreements, enabling a flexible approach to selecting the right combination of sites to meet the NCL requirement.
- Confirmation of the final NCL package will be determined following the completion of the following tasks or the confirmation of assumptions relating to these tasks:
  - ▶ Confirmation of all pertinent assumptions outlined within this Nature Conservation Strategy.
  - ▶ Comprehensive nightingale impact assessment (following confirmation of mitigation proposals, UXO clearance strategy and assumptions relating to cumulative impact from nearby developments).

- ▶ Confirmation that a standardised approach to nightingale impact assessment is being progressed for other developments within the Hoo Rural Town, with (where appropriate) the developers making financial contributions towards strategies outlined within this document.
- ▶ Completion of environmental and operational constraints' screening for each potential NCL site;
- ▶ Prediction of NCL site quality, based on expert opinion, will inform the conclusion about which NCL sites will be short-listed (this will be informed by the risks or uncertainties associated with establishing nightingale populations on these sites – recruitment risk, temporal lag etc.)
- ▶ Biodiversity Impact Accounting calculations (Section 7.2 provides further commentary) will then be applied to Lodge Hill and all NCL sites to provide a basis for determining the quantum of NCL that is required to offset the loss of SSSI.
- All sites identified within the final NCL package will then be secured through long term management agreements.

### 6.3 Early habitat establishment to address temporal lag

6.3.1 One of the key considerations regarding habitat loss and the provision of compensatory habitat is the time lag between loss of habitat at Lodge Hill and the provision of new on-site or off-site nightingale habitat if development proceeds.

6.3.2 The following measures provide excellent opportunities to minimise the lag period and consequently speed up the opportunity for grassland establishment on-site and for nightingales to colonise both retained habitats within the Lodge Hill site and off-site compensatory land:

- Sensitive phasing/clearance strategy – within the development footprint, UXO clearance and construction activity would, where appropriate be concentrated later in the Plan period, allowing habitat establishment in the short and medium term.
- Early (pre-consent and pre-development) management of SSSI habitats through the development of an SSSI management plan in consultation with Natural England – targeted management within the SSSI (subject to implementation of a rotational UXO clearance strategy – see Section 4.2) could include restoration of low value plantation woodland, which will maximise on-site habitat niches for nightingale in the short term.
- Early (pre-consent and pre-development) habitat creation will be undertaken on land owned by Homes England that is outside the-SSSI – development and implementation of a habitat creation strategy will provide early biodiversity gains for a number of protected/notable species and neutral grassland.
- Early (pre-development) restoration of undermanaged woodland within NCL sites and SSSI sites with strong nightingale populations, where targeted management will allow best address temporal lag issues in terms of the provision of nightingale habitat in the short term.

## 7. Biodiversity net gain

7.1.1 The Government recently introduced a 25 Year Plan to Improve the Environment (Defra, 2018)<sup>7</sup>. This promotes an 'environmental net gain' principle for new development, including housing and infrastructure, which accords with the Government's policy in the National Planning Policy Framework (NPPF) to provide net gains in biodiversity where possible.

7.1.2 This is a key principle when considering the planning balance with regard to the Lodge Hill proposals. The remainder of this chapter outlines how net gain will be calculated and sets out a series of net gain objectives and opportunities, which will build on emerging government policy and promote conservation-focussed initiatives.

### 7.2 Biodiversity impact accounting metric

7.2.1 In order for the Lodge Hill development proposals to demonstrate net gain, the outline Biodiversity Conservation Strategy incorporates an evaluation of biodiversity loss and gain through development. This is achieved through the calculation of habitat loss within the SSSI against the delivery of a biodiversity offset scheme (the nightingale habitat creation strategy), utilising a Biodiversity Impact Accounting Metric (BIAM).

7.2.2 The biodiversity metric approach was designed by Natural England and introduced by the Department for Environment, Food and Rural Affairs (Defra) in 2012 as the main component in Government pilot schemes set up to test 'biodiversity offsetting' delivery systems. These schemes examined whether such off-site compensation – creating or restoring new wildlife habitat in a different place to where it was lost – was an effective way of ensuring biodiversity loss was properly compensated for. Since then, local planning authorities (LPAs), developers and consultants across the country have increasingly used metrics as an accounting tool for assessing the impacts of development.

7.2.3 The metric calculates the scale of habitat loss (in this case the direct or indirect loss of SSSI at Lodge Hill) and the scale of enhancement (in this case the creation of off-site nightingale habitat) by multiplying the area (hectares), distinctiveness (habitat type) and condition (quality) of each habitat parcel.

- When losses of SSSI habitat are assessed (i.e. where effects to SSSI habitat will occur) the calculation provides a negative score. For the Lodge Hill development, calculations will be based on robust impact assessment modelling (of direct and indirect habitat loss) developed by experts in the field.
- When gains are assessed (i.e. where habitats are enhanced or created on the SSSI, or on off-site NCL sites) a similar calculation is made but risk factors that account for evaluation of site scale and quality, versus risk and uncertainty, and temporal delays are also applied. The score will be positive where gains are being delivered. Habitats that are more difficult to restore or that will take a long time to reach a set target condition, will score lower. These generate fewer credits and therefore a larger area is required to deliver a sufficient offset.
- When on-site gains do not outweigh on-site losses and a net biodiversity loss is calculated, this net loss becomes an offset requirement.

<sup>7</sup> Defra (2018). 25 Year Plan to Improve the Environment. HM Government.



- 7.2.4 This approach, which works in tandem with the expert-led nightingale site selection work, aims to deliver robust ecological accountability for the development proposals and is in accordance with the ten principles set out in the *Biodiversity Net Gain: Good practice principles for development*<sup>8</sup> developed by CIRIA, CIEEM and IEMA.

## 7.3 Net Gain Objectives and Opportunities

- 7.3.1 The outline Biodiversity Conservation Strategy for Lodge Hill should be considered in the context of the following achievable net gain objectives and opportunities:

### Objectives

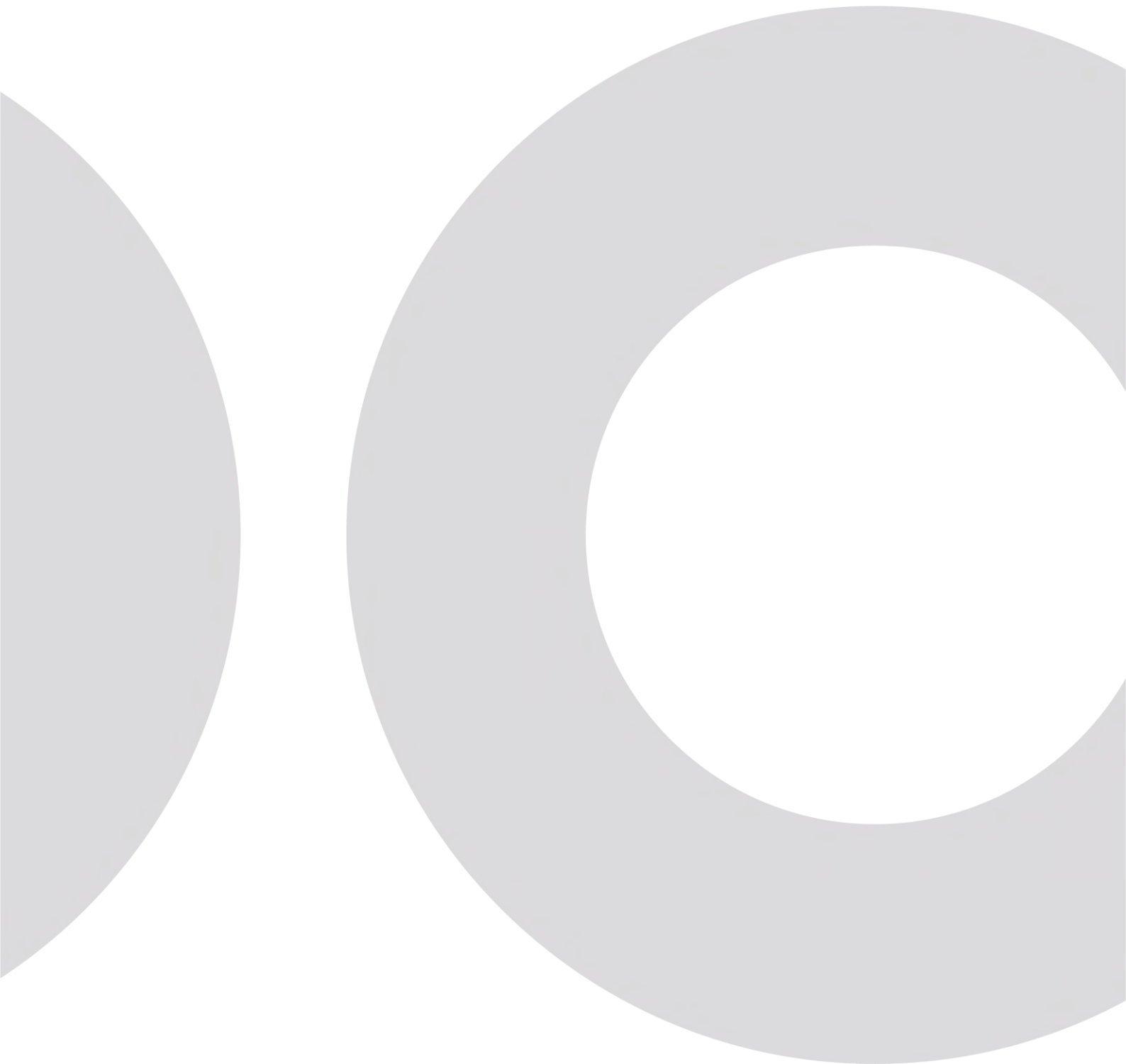
- To demonstrate with a sufficient degree of certainty that a net gain to the national nightingale population can be achieved through the long-term retention and maintenance of a viable population on Chattenden Woods & Lodge Hill SSSI, combined with strengthening of populations through creation of high quality habitat on NCL sites over the long term.
- To deliver significant biodiversity gain by creating a 'coherent ecological network' of well-connected NCL sites in core areas (these being existing sites of value for nightingale, in some cases SSSIs themselves) to maximise benefits for nightingale and ensure, insofar as is possible, the likely colonisation of these sites.
- To deliver what would be the largest habitat creation exercise of its kind ever in the UK for a single species, providing additional long-term biodiversity benefits to a variety of protected and/or notable species (over and above the benefits for nightingale).
- To create a new nationally important nightingale population through the delivery of one or more high quality NCL sites in proximity to or contiguous with a site with a strong existing nightingale population, leading to one or more SSSIs having nightingale as an interest feature, which would in turn strengthen the regional and/or national SSSI network.

### Opportunities

- To work with Government agencies to kick-start a National Nightingale Conservation Strategy based on habitat enhancement proposals and strategies developed through the Lodge Hill scheme, that addresses government aspirations to improve and incentivise conservation-focussed land management.
- To work collaboratively with nature conservation groups such as the RSPB and the Wildlife Trusts (Kent, Essex and Sussex), Buglife and others to support the conservation of local habitat and species priorities where habitat creation sites can deliver substantial additional biodiversity benefits for nationally declining species.
- To work collaboratively with universities and other research or academic institutions to develop research programmes, based on the extensive habitat creation proposals, which could offer a major opportunity to develop conservation-focussed outcomes.

<sup>8</sup> CIEEM, CIRIA, IEMA (2016). Biodiversity Net Gain: Good practice principles for development.

wood.



## Appendix IV

### Lodge Hill Housing Trajectory

## Homes England – Lodge Hill Simplified Housing Trajectory for Indicative 2,000 Dwellings

---

### Key Assumptions

#### Assumed Local Plan Programme

Regulation 19 Consultation	Nov/Dec 2018
Local Plan Submission to SoS	March 2019
Medway Local Plan adoption	2020

### Site Assumptions

Total site area	325.23ha
Net developable area (ha)	47.8
Density residential area (excluding Local Centre)	c.38.7dph
No. of residential dwellings	2,000

Anticipated dates	Completions	Cumulative total
2020 0		0
2021	0	0
2022 8	0	80
2023	120	200
2024 1	20	320
2025	140	460
2026 1	40	600
2027	140	740
2028 1	70	910
2029	170	1080
2030 1	70	1250
2031	173	1423
2032 1	70	1593
2033	170	1763
2034 1	57	1920
2035	80	2000
<b>Total 200</b>	<b>0</b>	<b>2000</b>

#### Assumptions

1. The housing total assumed in the above trajectory of 2,000 homes is indicative and may change.
2. The delivery rates include units for private market sale and affordable housing. The level of affordable housing is not specifically defined and will vary depending on factors such as scheme viability.
3. Site assumptions are currently under review as the site masterplan is firmed up.

**GVA**  
**June 2018**



## Appendix V

### Lodge Hill Benefit Statement

# Lodge Hill – A key component of the proposed Hoo Rural Town

“Towards an Integrated and Sustainable Community.”

Economic, Environmental and Social  
Benefits Statement

June 2018

## The Proposal

Up to 2,000 new homes  
25% affordable homes  
New primary school  
Local centre – commercial, retail

## Operational Phase



5,000 economically active population  
**£51.92** million gross annual income



**£48.14** million additional consumer spending



**200-350 Total Jobs** (mixed-use employment, retail, primary school)

## Construction Phase

c.171 FTE jobs per annum  
Direct employment



c.258 FTE jobs per annum  
Supply chain Jobs  
Indirect and induced Jobs



## Fiscal Benefits



**£3.64m** million annual  
Council Tax revenue



**£21.76m** New Homes  
Bonus payments (over  
a 6-year period)

NPPF para 19:

*“Planning should operate to encourage and not act as an impediment to sustainable economic growth. There significant weight should be placed upon the need to support economic growth through the planning system.”*



Undeveloped area reserved and enhanced for nature conservation purposes c.228 hectares;



Protection, and enhancement as far as practicable, of the ecological assets on the site, and where losses occur, comprehensive mitigation and compensation measures put forward to provide a net gain to biodiversity;



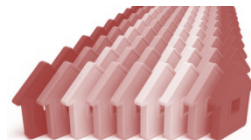
Protection and enhancement of the ancient monument and listed buildings within the site; and



Clearance, remediation and redevelopment of a previously developed, publically owned site in line with government policy which will provide a significant housing contribution to meet Medway's needs.

# Lodge Hill: Social Benefits

Providing up to 2,000 dwellings in Medway, making a substantial contribution to meeting the Borough's housing needs;



An affordable housing contribution of up to 25%, (c.500 dwellings), subject to viability considerations, making an important contribution towards addressing housing need;

Provision of c. 30ha of open and recreational space ("social infrastructure"), including access to open space previously inaccessible to the public;



Significant physical infrastructure improvements, including enhancement of existing roads and provision of a road network throughout the site;

Providing a long-term and enduring solution to address any potential threats to human health and safety through extensive site remediation and, critically, the removal of any potentially dangerous ordnance present within the site; and



Provision of a new Primary School within the development footprint.



# Economic Benefits: Calculation Method

## Construction Phase

### Direct Employment - Construction Phase

- The House Builders Federation (HBF) produced evidence in 2015 (The Economic Footprint of UK House Building, HBF and NLP, March 2015) highlighting studies that have sought to quantify the number of direct jobs created by house building activity across the UK. This included, Professor Michael Ball's report on behalf of the HBF and Construction Skills (2005) which found that volume builders (> 500 units p.a.) created around 1.2 direct full time jobs per dwelling, compared to an industry average of 1.5 full time jobs ("The Economic Footprint of UK House Building", March 2015).
- Based on the HBF's research, assuming a volume housebuilder develops the site, the delivery of up to 2000 dwellings would create c. 2,400 direct full time equivalent (FTE) construction-based jobs or c.171 FTE jobs per annum over the 14 year construction period.

### Indirect jobs

- In addition to direct construction job creation, there will be an indirect effect through the supply chain and the expenditure of wages in the local economy.
- The HBF's report identifies a range of multipliers which may be used to calculate indirect supply chain jobs. For the purposes of this calculation, we have used the CEBR report for NHF 2013, which identifies a supply chain multiplier of 1.78. This suggests that 1 construction job supports 0.78 jobs elsewhere in the supply chain. When applied in respect of the proposed development the following jobs in the supply chain could be supported, potentially offering opportunities to local businesses. The development of the site (see illustrative masterplan and land use budget) would deliver c.1,872 indirect jobs as a result of the 2,400 jobs created in the construction phase by volume housebuilders.

### Indirect and Induced Jobs

- When taking into account induced employment effects which includes employment supported by the wage spending of construction and supply chain workers in shops, services and other businesses throughout the UK economy - a range of higher 'combined' employment multiplier figures can be identified.
- For the purposes of this calculation we have used CEBR's report for the NHF which identifies a multiplier of 2.51. This indicates that for every 1 construction job, 1.51 indirect and induced jobs are created elsewhere in the supply chain and wider UK economy.
- The development of the site would deliver c.3,624 induced and indirect jobs as a result of the 2,400 jobs created in the construction phase by volume housebuilders or c.258 FTE jobs per annum over the 14 year construction period.

## Operational Phase

- The 2011 Census reveals that the average household size in Medway is 2.48; if this is applied in the context of Lodge Hill, the development of 2,000 dwellings would equate to a total estimated resident population of 4,960.
- If it assumed that 64% of the Borough's population are of working age (NOMIS, 2016), applying this to Lodge Hill would result in the development generating a working-age population of 3,174. When the Census-derived economic activity rate of 80% is applied, 2,539 residents would be economically active (NOMIS, 2016).
- The Census-derived proportion of those employed (75.3%) would, if applied to the development at Lodge Hill, result in 1,912 residents who are in employment (NOMIS, 2016). Applying the Borough-wide proportion of employees in the 'Major Group 1-3' category of the Office Labour Market Statistics (40.5%), approximately 774 residents would be employed in higher-skilled and professional occupations (NOMIS, 2016).
- In 2017, the average gross income in the Borough was £27,154 (NOMIS, 2017). Applied to the development at Lodge Hill, there would be an uplift in the gross annual income of new residents of £51.92m. This in turn would help to generate increases in household expenditure into the local economy, as illustrated below:
  - Convenience Goods Retail: Experian data (indexed to 2017 prices) forecasts that households in the Borough will spend an average of £4,793 on convenience (e.g. food) goods at 2034 (e.g. when the full resident population would be expected to be achieved at Lodge Hill). On this basis, residents of the development would generate approximately £9.59m of additional convenience goods expenditure per annum, which would be available to support retail facilities in the Borough.
  - Comparison Goods Retail: On the basis of forecast average household spend on comparison goods in the Borough (£12,479 at 2034), residents of the development would generate approximately £24.96m of additional expenditure per annum to support retail facilities in the Borough.
  - Leisure Goods: Forecast average household spend on leisure goods and services at 2034 is £6,795. When applied in the context of Lodge Hill, the development would generate approximately £13.59m of additional leisure spend which would be available to support businesses in the Borough.
- Employment - Mixed use Employment Floorspace proposed as part of the development 1 ha (2.5 acres) 6,500sqm (69,695 sqft) (medium- long term benefits). The Homes England (formerly HCA) Employment Densities Guide 3rd Edition (March 2015) provides an indication of likely employment generated per use class. Assuming that the mixed use element incorporates Small Business Workplace comprising B1a and B1b a standard of 30-60sqm is required per employee. In this case circa. 108-217 jobs would thus be created in the medium-long term.
- Retail - Retail Provision -within the site. 1,365 sqm (14,693 sqft) (medium- long term benefits). Assuming this is equivalent to A1 Retail foodstore, the HE guide outlines between 15-20sqm per employee which would result in c.68-91 jobs created in the medium-long term.
- Primary School - In relation to the proposed primary school, it is understood that average school pupil teacher ratios and pupil adult ratios are 21.1 and 11 respectively (for Local Authority Maintained Primary Schools in 2016). Assuming c.485 pupils this would provide 23-44 new jobs in the long term.

## Fiscal Benefits

- On the basis of 2,000 dwellings being delivered, the average level of Council Tax Receipt anticipated to be generated per annum for Medway would be £3.64m (assuming a mid-point of Band E at 2016/17).
- The anticipated level of New Homes Bonus payment generated by the development and made available to Medway over a 6-year period would be £21.76m (derived from the New Homes Bonus Calculator at 2016/17).

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

**BY EMAIL**

26978/A3/MH/BB  
25<sup>th</sup> June 2018

Dear Sir / Madam,

**MEDWAY COUNCIL LOCAL PLAN - DEVELOPMENT STRATEGY CONSULTATION  
REPRESENTATIONS ON BEHALF OF M&G REAL ESTATE LTD**

We have been instructed by our client, M&G Real Estate Ltd, to make representations on the Medway Local Plan Development Strategy published for consultation in March 2018.

Our client is the freehold owner of Medway Valley Leisure Park ('the Leisure Park') which is situated immediately east of the M2 motorway and HS1 train line beneath the Medway Viaduct, and immediately south of the Strood / Cuxton rail line. The Leisure Park is a popular and established leisure destination which offers a range of facilities including a multiplex cinema, bowling alley and bingo alongside food and drink outlets, a gym and hotel.

We support the Council's recognition of the role of the Leisure Park as a family leisure destination under proposed Policy RTC9. We would also welcome the Council's support for proposals which enhance current provision on the Leisure Park, subject to compliance with the sequential approach and (where relevant) impact assessment policy tests required under the NPPF. In reference to the proposed policy approach to these tests as set out within the draft Development Strategy document, we would comment as follows:

**Policy RTC2: Sequential Approach**

The NPPF requires Local Planning Authorities to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up to date plan. Main town centre uses should be located in town centres; then in edge of centre locations; and only if suitable sites are not available should out of centre sites be considered.

There is no provision within the NPPF to apply a hierarchical approach to in-centre locations and as such the Council's proposed approach to prefer Chatham above other centres is not in accordance with the NPPF and is not therefore sound.

It is part and parcel of the application of the sequential test that consideration be given to the likely catchment area that the proposed development will serve. Whilst it would be considered best practice to



Registered in England  
Number: OC342692

Barton Willmore LLP  
Registered Office:  
The Blade  
Abbey Square  
Reading  
RG1 3BE  
F/ +44 (0)118 943 0001

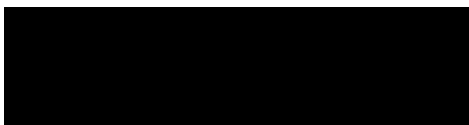
agree a catchment area with the Local Authority as part of pre-application discussions, we consider the inclusion of this as a policy requirement to be unduly onerous. It should instead be 'encouraged'.

### **Policy RTC3: Impact Assessments**

The proposed policy approach to impact assessments needs to be simplified and should accord with the tests set out within the NPPF. For example, there is no provision within the NPPF to apply additional impact tests i.e. impact on the strategy.

We trust these comments will be duly considered as part of the plan making process. If you have any queries, please do not hesitate to contact either myself or Susie Stephen at this office

Yours sincerely



**MARK HARRIS**  
Director

WE/ARS/CS/PD8901

email [REDACTED]

25 June 2018

Local Plan Development Strategy Consultation  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
ME4 4TR

Dear Sir or Madam

**MEDWAY COUNCIL LOCAL PLAN DEVELOPMENT STRATEGY CONSULTATION (MARCH 2018) – REPRESENTATIONS  
FORMER DICKENS WORLD, CHATHAM MARITIME, LEVIATHAN WAY, CHATHAM, ME4 4LL**

On behalf of our client, Schroder UK Property Fund c/o Schroder Property Investment Management Ltd, we write to submit representations to Medway Council in respect of the Local Plan Development Strategy Consultation (March 2018). Schroder Property Investment Management Ltd are the freeholders of the long term leaseholder of the former Dickens World, Chatham Maritime, Leviathan Way.

**Context for Representations**

The new Local Plan will replace the 2003 Medway local Plan and cover the period up to 2035. Following the initial Issues and Options and Development Options stages, the Local Plan Development Strategy has been published for consultation.

The Development Strategy consultation document sets out the ambitions for the Plan, options for how Medway could grow and draft policies for management development. This consultation will inform the next stage which will be the draft Local Plan.

At this Reg 18 stage in the Local Plan making process our comments are focussed on strategic issues. We reserve our position to comment on more detailed matters at the Reg 19 stage.

**Former Dickens World and Chatham Maritime**

The former Dickens World is a two storey leisure building, the ground floor of which has been subdivided into a number of smaller units including Prezzo, Nandos, Subway and Pizza Hut. Pure Gym occupy part of the first floor level. The Dickens World attraction closed in 2016 and has remained vacant since.

Following closure of the Dickens World experience Schroders have been looking to identify new leisure tenants for the building. As a consequence of this, the site is located within the Chatham Maritime Area as outlined in the current Medway Local Plan 2003.

The site is subject to a live planning application (ref: MC/18/1522) which seeks full planning permission for the following:

*“Reconfiguration of former Dickens World floor space to allow for the creation of two new D2 units and change of use of part of first floor level to restaurant (use class A3) in order to extend the existing Nando’s restaurant below together with external alterations to the building.”*

As part of Schroders ongoing asset management of the site, we set out our representations in response to the Local Plan Development Strategy documentation.

### **Background and Current Policy**

As detailed above, the site is located within the Chatham Maritime Area which is identified in the current Medway Local Plan.

Policy S8 of the current Medway Local Plan (2003) establishes the land use planning context for the Chatham Maritime Area. The policy encourages the mixed use redevelopment of this area and specifically states that development within this area will include a factory outlet centre (retail), Class B1 offices, a hotel, land and water-based leisure uses and housing. The policy goes on to state that tourist facilities and Class A3 uses of a scale commensurate with their location will also be appropriate.

Whilst Policy S8 positively reflects the established land use within the Chatham Maritime Area, there is an inherent tension between this policy and Policy L2 of the Medway Local Plan (2003). Policy L2 looks to direct new leisure facilities falling within use Classes D1 and D2 towards town centre or edge of centre locations. The site does not fall within Chatham town centre and therefore is considered an out of centre location.

### **Retail Policies and Chatham Maritime Allocation**

We consider that the new Local Plan affords opportunity of addressing this policy conflict.

Moving forward, we are generally supportive of the Local Plan vision which places regeneration at the heart of Medway's development strategy.

Policy RTC1 of the Development Strategy document identifies Chatham as the primary centre at the top of the hierarchy with a focus on this to be the main location for comparison retail, community uses, leisure, culture and tourism. We support the continued promotion of Chatham town centre as the focus for retail uses which aligns with the current adopted Local Plan.

It is important to note that since the Local Plan adoption in 2003, Chatham Maritime has become well established as a mixed use destination in its own right, including leisure uses and the factory outlet centre. Therefore, we consider the new Local Plan should recognise this position and how if managed properly would allow the area to perform complementary to the town centre.

We therefore welcome the Development Strategy's inclusion of Chatham Maritime as one of the major regeneration sites identified in Chatham. Within Chatham, one of the aims is a greater diversification of land use in the centre which in turn will promote an enhanced range of leisure opportunities to boost the daytime and evening economy. In line with adopted Policy S8, allocation of Chatham Maritime within the Local Plan will ensure that this mixed use area can continue to serve as a leisure destination which complements the adjacent Chatham town centre. This will ensure that a mix of leisure and certain appropriately controlled retail uses can continue to be directed at this location where appropriate but the focus of retail will still remain within Chatham town centre. Therefore, we request that Chatham Maritime is continued to be promoted as a major regeneration site with an allocation for mixed use leisure led development to come forward in the draft Local Plan.

### **Conclusions**

In summary, we broadly support the overarching objectives set by the Local Plan Development Strategy and feel the Dickens World site can play an important part in meeting these.

We strongly recommend that an allocation for the Chatham Maritime area be included in the Local Plan.

We trust these comments are useful at this consultation stage. We look forward to viewing the statutory publication of the draft Local Plan and hope that this addresses our comments. Should you require any clarification of the issues raised in this letter, please do not hesitate to contact Will Edmonds, Anna Russell-Smith or Chloe Saunter at this office.



Yours faithfully



**MONTAGU EVANS LLP**

**maryott, kyle**

---

**From:** [REDACTED]  
**Sent:** 25 June 2018 09:35  
**To:** futuremedway  
**Subject:** Building at Hoo  
  
**Categories:** Blue Category

I fail to see how any one in there right mind would contemplate building more houses at Hoo It is difficult to get down four elms hill now let alone hundreds more properties and industrial units using what is a single main road off the Hoo peninsular As one of your councillors live on the Hoo Peninsular he must know how difficult it is ie Phillip Filmer Sent from my iPad

**From:** [REDACTED]  
**Sent:** 23 June 2018 10:43  
**To:** smith, catherine  
**Subject:** Local Plan response

Response to the Local Plan consultation from Frindsbury Extra Parish Council

The major concern that Frindsbury Extra parish councillors have relates to the pressure on roads and traffic movements within the parish.

The proposed increase in development on the Hoo Peninsula, especially residential, will greatly exacerbate the pressure already experienced at Four Elms roundabout, the Sans Pareil roundabout and at the Medway Tunnel/Medway City Estate roundabout. Although a proposal to create a slip road at the Four Elms roundabout to enable traffic for the Peninsula to avoid the roundabout itself, this will do nothing to help traffic coming off the Peninsula. In addition, not all traffic will be using the A289 for access to and from the London direction. Some will want to use the Medway Tunnel and some will want to go into Strood either for shopping or to use the rail station. All 3 routes pass through the parish. Extra traffic will encourage the use of side streets as "rat runs", which is already happening.

The Parish Council asks that the road infrastructure is considered and implemented as soon as possible and certainly before any development takes place. Members would like to see phased traffic lights on all 3 roundabouts and the promised construction of a footbridge over the A289 near Four Elms roundabout to assist pedestrians walking between Frindsbury Extra and Hoo, who currently take their lives in their hands by crossing the dual carriageway roads close to the roundabout.

Roxana Brammer  
Parish Clerk

Planning Policy, Regeneration, Culture, Environment and Transformation  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent  
M34 4TR

**Date:** 25 June 2018

**Our ref:** 04051/03/NT/SIN/15779858v5

Dear Sir / Madam

**Future Medway Local Plan 2012 to 2035: Development Strategy Consultation:  
Representations on Behalf of Bourne Leisure Ltd.**

On behalf of our client, Bourne Leisure Ltd., please find below representations on the Future Medway Local Plan 2012 to 2035 – Development Strategy Regulation 18 Consultation Report (March 2018), published for consultation until 25 June 2018. Bourne Leisure has previously commented on several Medway Local Plan consultations, the most recent of which was the Development Options Regulation 18 Consultation Report by way of representations dated 23 February 2017.

We now set out comments on the Medway Local Plan Development Strategy Report in response to the policy approaches proposed in relation to:

- 1 Vision and Strategic Objectives;
- 2 Spatial Development Strategy;
- 3 Economic Development;
- 4 Nature and Environment;
- 5 Built Environment;
- 6 Infrastructure; and,
- 7 Minerals, Waste and Energy.

By way of background to these representations, Bourne Leisure operates over 50 holiday sites in the form of holiday parks, hotels, and family entertainment resorts in Great Britain and is therefore a significant contributor to the national tourist economy, as well as local visitor economies. Within Medway, Bourne Leisure operates Allhallows Leisure Park.

For the company to continue to attract customers and to respond to changing market conditions, Bourne Leisure needs to invest regularly in order to provide new and improved facilities and accommodation.

**For many of Bourne Leisure's** holiday parks, improvements often necessitate the expansion of sites in order to decrease densities improve the quality and amount of accommodation, and increase the range of facilities in order to extend the holiday season to provide more of a year-round attraction (notwithstanding the seasonal occupancy restrictions in place).

Nationally, many of Bourne Leisure's sites are located in rural and/or coastal areas, often adjacent to, or incorporating environmentally and ecologically sensitive sites. The Company also has significant experience of taking into account the need for protection and enhancement of such sites as part of day-to-day operations and when drawing up development proposals.

Please see below Bourne Leisure's response to various policy approaches which respond to the questions as set out in the online survey.

## **Response to Policy Approaches**

### **Vision and Strategic Objectives**

Bourne Leisure owns and operates Allhallows Leisure Park within the Local Plan area. Therefore the Company endorses the Council's recognition of Allhallows Leisure Park as a major tourism destination and the contribution static caravan accommodation makes to Medway's tourism economy in particular.

Paragraphs 23 and 28 of the National Planning Policy Framework (NPPF) promote tourism in both town centre and rural locations respectively, to support competitive towns and the rural economy. However, the Company considers that the vision for 2035 (p.19) needs to include the wider role of tourism, specifically to highlight that tourism is a key activity in Medway that should be supported to continue to make a significant contribution to economic growth. This is particularly important as, at present, there is an inconsistency between the Council's draft Vision and its wider strategies elsewhere in the emerging Development Strategy document.

Under the Strategic Objective of "*A place that works well*" (p.22), a further bullet point should be included to set out the need to support and enhance the role of tourism in the Borough and its contribution to economic growth in order for it to be consistent with national policy. Bourne Leisure suggests adding the following additional point to the draft Objective:

*"To promote the role of the tourist sector in the Borough, by supporting tourism-related businesses to maintain and enhance their offer, in recognition of the contribution tourism makes to the Medway economy"*

### **Spatial Development Strategy**

#### **Policy DS1 (Sustainable Development)**

Bourne Leisure endorses the flexible approach to determining applications in the context of sustainable development as set out in draft Policy DS1. This is compliant with the NPPF, whereby paragraph 14 sets out a presumption in favour of sustainable development for both plan-making and decision-taking.

#### **Policy DS2 (Spatial Development Strategy)**

Bourne Leisure considers that draft Policy DS2 does not represent a positive approach to managing Medway's growth as it does not consider the role of the tourism industry and its contribution to economic growth. As owner and operator of Allhallows Leisure Park, Bourne Leisure must continually review its offer to ensure that the facilities provided respond to the continuous changes in the market and guest expectations for high quality accommodation and facilities. This is not particular to Bourne Leisure and reflects the demands upon the sector as a whole. Without the inclusion of reference to the tourism industry in this emerging policy, draft Policy DS2 is not compliant with paragraph 14 of the NPPF and the requirement for "*local planning authorities should positively seek opportunities to meet the development needs of their area*".



Bourne Leisure therefore recommends that the Council amends draft Policy DS2 to ensure that the needs of the tourism sector are an integral part of the spatial strategy for Medway. The Company suggests that the policy highlights the contribution the tourism industry makes to the local economy and encourages that these uses are maintained and enhanced to meet the tourism demand in the Borough.

## **Economic Development**

### **Policy E1 (Economic Development)**

Bourne Leisure considers that in order to set out an effective approach to securing and strengthening **Medway's economy, tourism should** be referenced in draft Policy E1 as a strength of its economy, reflecting **the Council's evidence base and supporting** paragraph 5.10. This will ensure that the emerging policy highlights the key contributors to the local economy and provides a basis for decision making in the future.

The NPPF requires that local plans promote a strong rural economy through supporting sustainable rural tourism, and this should include supporting the provision and expansion of tourist facilities in appropriate locations where there is an identified need (paragraph 28). For consistency with the NPPF, Bourne Leisure recommends that draft Policy E1 be amended to make reference to tourism as one of the strengths of **Medway's economy**.

Bourne Leisure employs 16,000 staff across the UK, for which skills development and training opportunities are provided. It can be considered that employment at Allhallows Leisure Park can assist in supporting the actions to raise skills levels and local labour opportunities, and promote the **diversification of Medway's** economic base.

Bourne Leisure suggests the following text be inserted into draft Policy E1:

*"The Council will support actions to:*

...

- **Ensure the tourism sector in Medway is supported to continue to deliver economic growth**"

### **Policy E2 (Rural Economy)**

Bourne Leisure endorses draft Policy E2 as it supports sustainable rural tourism, which would include Allhallows Leisure Park as tourist accommodation outside the settlement boundary of Allhallows. This draft policy is consistent with the NPPF, in particular paragraph 28 which seeks to support sustainable rural tourism as part of promoting a strong rural economy. The Company would not suggest any alternative policy approach.

### **Policy E3 (Tourism)**

Bourne Leisure endorses draft Policy E3 for its flexible and positive approach to tourism development in the Borough. In particular, the Company endorses the positive approach to development proposals in terms of encouraging economic development in rural areas, subject to avoiding negative environmental impacts. The approach set out in draft Policy E3 is consistent with paragraphs 23 and 28 of the NPPF and the economic **contribution of Allhallows Leisure Park's is recognised at** paragraph 5.37 of the supporting text. Therefore, Bourne Leisure does not seek an alternative policy approach.

## Policy E4 (Visitor accommodation)

Bourne Leisure recognises the importance of setting out the requirements for retaining and providing visitor accommodation in Medway. The Company notes the five criteria set out in draft Policy E4 as requirements for development proposals for visitor accommodation. Bourne Leisure suggests that greater clarity is provided in the emerging policy to recognise that not all criteria will be relevant to every proposal for visitor accommodation.

Changing the format of the emerging policy to allow for development proposals to be considered against the criteria where they are relevant would provide a clearer steer for applicants on how each of them should be applied. Paragraphs 23 and 28 of the NPPF provide support for Local Plans to include consideration for the provision for tourism needs in both town centre and rural locations. This amendment would therefore be consistent with national policy in not limiting tourism development by location or only where there a need is identified.

To this end, Bourne Leisure considers the policy should be separated out so that the first three criterion are **'OR'** requirements for development proposals to meet, ensuring the policy does not limit otherwise sustainable development from coming forward. The last two criteria would be relevant to all proposals and should allow for mitigation to be provided where possible.

The Company, therefore, suggests the following amendments to draft Policy E4 (new wording in underline and in bold):

***"The retention and provision of visitor accommodation is encouraged in accordance with the principles set out below:***

- **Where it meets a proven need, particularly those sectors of the market where evidence indicates unmet demand, such as a high quality boutique hotel in Rochester, and quality self-catering accommodation;**  
**or***
- **Development enhances the quality and offer of existing visitor accommodation and its setting;**  
**or***
- **Where the proposal contributes to the vibrancy, vitality and viability of town centres and the sustainability of wider settlements.***

**In addition, proposals should seek to meet the following criteria:**

- ~~**Where**~~ **The proposal avoids negative impacts on the environment, is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic and natural environment, avoids siting in areas of high flood risk and intrusion into the landscapes of open countryside. Where these requirements cannot be met, it should be demonstrated that suitable mitigation will be delivered as part of the proposal.***
- **Maximises opportunities for sustainable travel in accessible locations and minimises traffic generation, wherever possible.***

## Nature and Environment

Bourne Leisure considers that an additional policy which seeks to avoid adverse impacts from noise should be included in the emerging Local Plan. Whilst paragraph 7.34 advocates that noise management is considered as early as possible in the planning process as currently drafted there is no specific policy that addresses this. Such a policy should ensure that development proposals consider the protection of amenity of neighbouring and nearby sites, with particular regard for the nature of those sites.

Paragraph 109 of the NPPF states that both new and existing development will be prevented from being adversely affected by unacceptable levels of noise pollution. Therefore this additional policy is required to ensure the Local Plan is compliant with the NPPF and has the necessary local planning policy to address all issues that could arise from development proposals and with specific regard to protecting sensitive neighbouring uses, including tourist accommodation.

## Policy NE1

Bourne Leisure acknowledges that development proposals should have no adverse impacts upon designated ecological sites. However, the Company considers that draft Policy NE1 is too restrictive in that it does not recognise that adverse impacts can often be effectively mitigated and in this regard is not consistent with national policy.

Paragraph 118 of the NPPF states that in determining planning applications, LPAs should aim to conserve and enhance biodiversity, and apply certain principles including of relevance to SPA and Ramsar sites: *“if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”*.

Allhallows Leisure Park adjoins the Thames Estuary & Marshes SPA and Ramsar to the south. Many of **Bourne Leisure’s sites are located in rural and/or coastal areas, and incorporating** or adjacent to environmentally and ecological sensitive sites. The Company has significant experience of operating within and adjacent to such locations and takes the need for environmental conservation and enhancement fully into account – both in day-to-day operations and when preparing development proposals for sites. In order to contribute to meeting the objectives that are set out in the emerging Local Plan with regard to economic growth, there is a need for draft policy NE1 to take a more positive approach to development within or adjacent to these designated sites.

Bourne Leisure suggests the policy is reworded as follows (new wording in underline and bold):

*“The estuaries and marshes of the Thames, Medway and Swale are designated Special Protection Areas (SPAs) and Ramsar sites in recognition of their international importance as wetland habitats. There is a Special Area of Conservation in the North Downs woodland near north Halling. These sites require the highest level of protection from development that could damage the features of the designated areas. No development will be permitted which may have an adverse effect on the integrity of an SAC, SPA or Ramsar site, ~~alone or in combination with other plans or projects,~~ **unless appropriate mitigation measures are provided to address this impact, as such development** ~~it would not be in~~ **accordance with the Habitat Regulations 2010 (as amended), would not be consistent with national planning policy and would not be in accordance with** the aims and objectives of this emerging Local Plan.*

*The council will work in collaboration with local planning authorities in north Kent to contribute to the delivery of a strategic access management and monitoring scheme to address potential damage from population increases on the designated SPA and Ramsar 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 Strategic Access Management and Monitoring Strategy (SAMMS) Project Board.*

*The council will consider the potential for adverse impacts on the Special Areas of Conservation arising from development, either alone or in combination with other plans and projects. If the assessment shows that there is a potential for adverse impacts, steps will be taken to restrict or mitigate development.”*

## **Policy NE2**

Bourne Leisure considers that draft Policy NE2 should adopt a more flexible approach in its wording to ensure that development can come forward, unless it would have an unacceptable adverse impact upon the SSSIs.

Allhallows Leisure Park adjoins South Thames Estuary and Marshes SSSI to the south. Paragraph 118 of the NPPF sets out that proposed development on land outside a SSSI (which would include Allhallows Leisure Park) likely to have an adverse effect on the designation should not normally be permitted. However, the paragraph recognises that an exception should be made where the benefits of the development clearly outweigh the impacts on the features of the designation and any broader impacts to the wider SSSI network.

The Company recommends that, in order to be consistent with national policy, the Council should better reflect Paragraph 118 of the NPPF in draft Policy NE2 by including reference to development proposals where benefits outweigh the impacts on the SSSI and SSSI network.

Bourne Leisure suggests the following additional wording be included to the draft policy text (new wording underlined and in bold):

*“...pursuing opportunities to strengthen biodiversity networks.*

**Where development proposals can show that the benefits of the development outweigh the impacts on the features of the SSSI designation and any broader impacts on the wider national SSSI network, development shall be permitted.”**

## **Policy NE5**

Bourne Leisure recognises the importance of protecting and providing green infrastructure to enhance the wider green infrastructure network and ensuring that through this Medway continues to be an attractive place for visitors. However, the Company suggests that the emerging policy should provide a more flexible approach with the criteria applied to each application on a case-by-case basis. The requirements should also be proportionate to the development proposed. This change would allow due consideration of the aims and objectives of the policy without overly restricting development proposals that contribute to meeting emerging strategic priorities, particularly in relation to tourism and economic growth.

Paragraph 114 of the NPPF requires LPAs to “*set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure*”. In order for draft Policy NE5 to be consistent with national policy it needs to incorporate a more positive approach to the planning of green infrastructure.

Bourne Leisure suggests the following text is added to the policy:

**“Each application will be considered on a case-by-case basis, proportionately reflecting the nature and context of the development proposed.”**

## **Policy NE7**

Bourne Leisure understands the importance of flood management, as Allhallows Leisure Park is located partly within Flood Zone 2 and adjoining Flood Zone 3 and is also located in a tidal flood risk area in the northern area of the Park. The Company considers that the section ‘*Flood Risk Management*’ under draft

Policy NE7 should be more flexible to allow for a development proposal to mitigate any impact it may have on the effectiveness of flood defences. At present the policy can be considered to be too restrictive on otherwise acceptable proposals coming forward and is not consistent with paragraph 94 of the NPPF which requires LPAs to adopt proactive strategies to mitigate and adapt to climate change, including taking account of flood risk considerations.

In addition, Bourne Leisure considers that under the heading *‘Adaption to Climate Change’* draft Policy NE7 should be amended so that the six criteria listed are provided as possible measures to be included. Their inclusion should be considered on a case-by-case basis in consideration of what a development proposes and the viability for that development to deliver the measures listed in the draft policy. Paragraph 99 of the NPPF requires Local Plans to take account of climate change over the longer term and specifically highlights that new development should be planned to avoid an increased vulnerability to the range of impacts (including flood risk, water supply and biodiversity) arising from climate change. Improving the flexibility of the policy will still allow it to be compliant with national policy, while still ensuring that development is not restricted when it is otherwise acceptable. Restricting or prohibiting the growth of existing facilities that are located **within areas of flood risk could stall investment in the local area and could undermine Medway’s ability to meet the emerging Vision and Objectives.**

Considering the above, Bourne Leisure suggests the following changes are made to the sections *‘Flood Risk Management’* and *‘Adaption to Climate Change’* (new wording is underlined and in bold).

#### *“Flood Risk Management*

- *Ensuring that development has a positive or nil impact on flood risk management interests*
- *Development that would harm the effectiveness of existing flood defences or prejudice their maintenance or management will not be permitted, **unless it can be suitably mitigated***
- *...”*

#### *“Adaption to Climate Change*

*Development will be required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of adaptation measures, **where possible**. These **measures could** include:*

*...”*

### **Policy NE8**

Bourne Leisure endorses draft Policy NE8 as it supports the use of acceptable and effective mitigation measures. However, the Company is concerned that the emerging policy does not clearly state that where there are adverse unacceptable air quality impacts upon sensitive neighbouring uses that cannot be effectively mitigated, that the proposed development will not be acceptable. Careful consideration of the impacts of changes to air quality upon sensitive neighbouring uses should be undertaken to ensure that uses such as tourist accommodation can continue to attract new and repeat visitors to Medway.

The NPPF sets out a requirement under paragraph 109 to ensure that both new and existing development does not contribute to or be put at risk of unacceptable levels of air pollution.

For consistency with national policy, Bourne Leisure suggests the following amendments are made (new wording underlined and in bold):



*“...The guidance also advocates mitigation measures for all development. Where mitigation is not integrated into a scheme, the council will require this through a planning condition(s). If on site mitigation is not possible, then the council may seek contribution to wider air quality mitigation measures through a planning obligation **but this approach will not be acceptable where there remains an adverse impact upon sensitive neighbouring uses.**”*

## Built Environment

### Policy BE2

Bourne Leisure supports the Council’s commitment to addressing the causes of climate change and endorses the approach to achieve high levels of sustainable design and construction. However, the Company notes that paragraph 8.11 of the supporting text of draft Policy BE2 requires non-residential development to meet the ‘Very Good’ BREEAM standard for energy and water efficiency. It should be recognised that not all development proposals will be able to meet this requirement and flexibility should be included within the supporting text of this emerging policy to reflect these circumstances.

Bourne Leisure suggests that the requirement for non-residential development to meet the BREEAM ‘Very Good’ standards should only apply where it would be appropriate to do so. Bourne Leisure considers that the current wording is too restrictive to allow otherwise welcome development which supports the growth of tourism in the Borough to come forward. Such a restriction would have the potential to undermine the ability of the Local Plan to meet its overarching strategic objectives. Paragraph 8.11 also needs to recognise that it is not always financially viable or technically feasible to reach this BREEAM level, and the paragraph should provide a clear statement that this is the case. Paragraph 95 of the NPPF supports energy efficiency improvements but does not categorically require them. The proposed amendments would be consistent with national policy.

Bourne Leisure suggests that paragraph 8.11 of the supporting text of draft Policy BE2 should state (rewording underlined and in bold):

*“The Building Research Establishment Environmental Assessment Methodology (BREEAM) provides a nationally-recognised standard for the sustainable design of non-residential development. Non-residential development should meet a ‘Very Good’ BREEAM standard in terms of both energy efficiency and water efficiency **where appropriate.**”*

### Policy BE3

Bourne Leisure endorses draft Policy BE3 as it ensures that housing developments must be designed to minimise disturbance to occupants of nearby land uses from noise, vibration and pollution. Land to the south of Allhallows Leisure Park is currently allocated as a possible residential development (ref. SO9), therefore this emerging policy is important to Bourne Leisure to ensure that the Park can continue to be a popular and viable destination and that the amenity of guests is not compromised in the long-term. Paragraph 109 of the NPPF requires that both new and existing development is prevented from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution. This draft policy is therefore consistent with national policy.

## Infrastructure

### Policy I2

Bourne Leisure recognises the importance of developer contributions when bringing development forward to ensure that any infrastructure shortfalls that the development proposal will require are also delivered.

Bourne Leisure also endorses the flexible approach draft Policy I2 has to meeting these contribution requirements where viability is an issue. However, the Company would like there to be greater clarity where the emerging policy addresses that in the event that a developer considers that contributions would make a proposal unviable, the Council would require an ‘open book’ approach. Bourne Leisure considers that this emerging policy needs to make a clear statement that an ‘open book’ approach would be used, while accepting that some elements of the assessment should remain confidential, for example, certain sensitive commercial aspects.

Bourne Leisure suggests that draft Policy I2 is amended to state the following (rewording underlined and in bold):

*“...Where developers consider that providing or contributing towards the infrastructure requirement would have serious implications for the viability of a development, the council will require an ‘open book’ approach and, where necessary, will operate the policy flexibly. **Where the ‘open book’ approach is required, it will be carried out at the council’s discretion and ensured that sensitive information which could compromise the applicant’s operations in any way will remain confidential.**”*

## Policy I4

Bourne Leisure endorses draft Policy I4 as it requires proposals which involve the development of communications installations to have regard to the impact of that development on the surrounding area (including visual amenity, character and appearance). This emerging policy is consistent with paragraph 43 of the NPPF which sets out that Local Plans should ensure that where new radio and telecommunications masts are needed, equipment should be sympathetically designed and camouflaged where appropriate. It is important that the adverse impacts of any such development are suitably mitigated so that there is no adverse impact upon the ability for tourism operators to attract new and repeat visitors to Medway.

Therefore, Bourne Leisure does not have an alternative suggestion for an approach to planning for communications infrastructure in the Medway Local Plan.

## Policy I6

Bourne Leisure recognises the importance of retaining open space, recreational and sports facilities in Medway. However, the Company considers that draft Policy I6 needs to provide a clear statement that it refers to public open space and not all open space. **The glossary of the NPPF defines open space as ‘all open space of public value’.** Draft Policy I6 needs to clearly set this out for consistency with national policy. Such an approach will provide clarity in the interpretation of the policy with respect to the determination of future planning applications.

Bourne Leisure suggests that draft Policy I6 is amended to state the following (new wording underlined and in bold):

*“Policy I6: **Public** Open Space and Sports Facilities*

*Existing **public** open space, sports and recreational buildings and land...”*

## Minerals, Waste and Energy

### Policy MWE2

Although Bourne Leisure understands that there is a requirement to extract sands and gravels to meet local and regional needs, the Company requests that draft Policy MWE2 has consideration for the impact that an

extraction proposal may have on an existing land uses on or near to the site. Allhallows Leisure Park adjoins a proposed search area, to the south.

Paragraph 143 of the NPPF includes that Local Plans should set out environmental criteria, against which applications would be assessed to ensure there are no unacceptable adverse impacts on the natural and historic environment or human health, including from noise, dust and visual intrusion, among other factors. Bourne Leisure therefore considers that in order to be compliant with national policy, Policy MWE2 must include these considerations within the emerging policy, and in addition should specifically set out in the supporting text that where tourism accommodation uses are located on or adjoining a potential or proposed minerals site, extraction proposals would not be acceptable where the development would give rise to any adverse impacts upon the existing accommodation.

In addition and for the same reason, the Minerals Area of Search Map (included on p.173 of the consultation document) should include a suitably effective buffer between the boundary of the search area and the Park.

Bourne Leisure suggests that draft Policy MWE2 and the supporting text is amended as follows (new wording underlined and in bold):

***“Proposals for the extraction of sand and gravel will be permitted within the identified areas of search when:***

...

- The proposed development has demonstrated that there will be no adverse impact on the built and natural environment, or to human health. This shall include in relation to noise, dust and visual intrusion, among other considerations as set out in paragraph 143 of the National Planning Policy Framework”***

A further paragraph of supporting text for Policy MWE2 should also be inserted which states:

***“Where a potential or proposed minerals site is located on or adjoins a tourist accommodation use, extraction proposals will be refused where they would give rise to adverse impacts that cannot be mitigated.”***

### **Policy MWE9**

Bourne Leisure has significant concerns regarding the Disposal to Land Resource Areas map (included on p.180 of the consultation document) which shows Allhallows Leisure Park partially within the Disposal to Land Resource Area. A proposal for the disposal of non-inert or hazardous waste would conflict significantly with the existing operations at Allhallows and therefore the Company considers that the holiday park should be removed.

Furthermore, the criteria listed under draft Policy MWE9 should be reworded to ensure that any waste disposal proposals that come forward for consideration under this policy must have no adverse impact on the amenity of visitors and employees at Allhallows and not only upon nearby residential amenity. This is important because this type of development may have adverse impacts upon neighbouring uses which could in turn prevent Allhallows (and other tourist providers in the area) continuing to attract new and repeat visitors to Medway which would have an adverse impact upon the local economy. It is also important that the amenity of employees is also protected. The draft policy is not consistent with national policy as paragraph 143 of the NPPF sets out that Local Plans should ensure that planning applications for permitted operations do not have unacceptable adverse impacts on human health including through noise, dust and visual intrusion.

Bourne Leisure suggests the following rewording of draft Policy MWE9 is made (rewording underlined and in bold):

- “Other local impacts, including on residential, **visitor and employee** amenity, being acceptable; ...”

Bourne Leisure also requires that Allhallows Leisure Park is removed from the Disposal to Land Resource Area and a suitably effective buffer between the Park and the identified area is provided.

## Summary

We trust these representations are clear and will be considered and reflected fully within the drafting of the Future Medway Local Plan. Please do not hesitate to contact me or my colleague Sophie Innes should you require any further clarification on any of the points made. We would also be grateful if you could confirm receipt of these representations and keep us informed in the future of any further consultation stages on the Local Plan and any other emerging local development documents.

Yours faithfully,



**Margaret Baddeley**  
Planning Director

**maryott, kyle**

---

**From:** [REDACTED]  
**Sent:** 25 June 2018 09:50  
**To:** futuremedway  
**Cc:** [REDACTED]  
**Subject:** [REDACTED]  
**Attachments:** ATT00003.txt; ATT00004.txt

**Categories:** Blue Category

my ref ELL-191 date Sunday 24 june 2018  
L Ellison [REDACTED]

Helping you - ( Medway Council ) - in Serving US.

comments on the proposals in the Development Strategy document  
Responding to new policy T4 and question T7 , Answer is NO

sent by my friends email as I have no real UK address to send a letter with these comments too.

Being only a very un-qualified person in Airports, I hope the reader of these comments will understand that I may not have all the facts correct, but I have tried to only state what I have found out after a lot of searches and experiences with the airport over the last 50 years. Also my experience from the air is limited to my last flight to Jersey (channel Islands) in 1975.

policy T4

comments on

Draft Medway Local Plan  
future of Rochester Airport (or if renamed, Medway Airport)  
Note the Airport as named is in fact only classed as an Aerodrome.

Question T7

I do not agree with the proposed plan

Reasons closing the 16/34 runway is a move that would prove Medway council to be full of councillors, either crazy, or un-knowledgeable in the matter of airports, I prefer to believe its the second.  
In fact the 16/34 should remain open with the runway to close being the 02/20 if any runway is to close.  
reasons as follows

1/

Aircraft landing and taking off, Im told by RAA that it is the responsibility of the pilot to fly within the rules of RAA. seems many break these rules without any telling off.

(a)

Pilots are not to enter the glide slope under 500ft, this rule is broken so many times as I've seen them below 200ft heading towards my house turning onto 20/02 with engines roaring as they turn.

(b)  
Pilots are expected to use the PPAI to be correct on the glide slope, so many of them come in too low, ignoring the red lights shining at them.

The problem is pilots follow the terrain of the land, and do not realise they are well below the height that the start of the runway is stated, so have to go into full power over the houses to attain altitude and miss hitting the roof of houses in city way.

(c)  
The 02/20 runway is the shorter of the 2 runways so why close the longer runway.

(d)  
The 16/34 runway causes less overflying of the dense residential housing

(e)  
In all of southern England there seems to be no other Approved Airfield that points aircraft over such dense populated area, this surely cannot be sensible.

(f) RAA say the winds are mainly along the 02/20, yet over the last year the 02/20 has been used when the winds are 90 degrees offset, So what's the problem with the 16/34 again.

2/  
Noise from Aircraft  
Do people understand noise, I very much doubt it.

Sunday 24 June

8:00 am by my rear door  
Sound levels min 33 dbc max 53 dbc  
noise from crows squarking and pigeons hooting

1:00 pm by my rear door min 40 dbc max 54 dbc  
no planes

1:10 pm by my rear door 57 dbc  
Jet flying from Heathrow overhead high.

1:15 pm by my rear door 94dbc  
one of many small planes today taking off over me from 02/20  
with sound levels between 73 and 96 dbc.

12:00 Indoors, window and doors, shut 18dbc.  
TV Turned on, normal sound 50 dbc  
back door opened plane flying over 88dbc  
meter positioned 10ft from TV 10ft from open door.  
Unable to hear sound from TV as plane passes.

Last year a helicopter gave me a meter reading by my rear door of 115 dbc and he was not even overhead.

The sound levels over my house above are in fact over 10 dbc quieter than the reading I get by the houses in Marconi way, if my meter reads 93 here it reads 105dbc in Marconi way with the same plane.

3/ Having lived here for 30 years the planes get louder and more continuous  
the loudest plane when I moved in was the plane from Southend to Jersey



and always came in at a regular time during the week so did not frighten us.  
It seemed to be about 90 db, no louder than the small aircraft flying out today.

4/

Flying from the airport was restricted at weekends with normally no flights on Sundays, flying would finish on a saturday early in the afternoon. No such luck nowadays with flights starting at weekends from about 8:30am to 6:30 pm. On the bright side I dont have to suffer the neighbours with their outdoor barbecues anymore as it is no more any fun under the perpetual plane noise. Sunday which were the quietest day now are now the most noisy.

5/

Total madness, last year 1 aug 2017 9:40am a plane flew in at a estimated speed of 137mph and at a calculated height of only 80 ft It had NO IDENT so I was unable to report it.

6/

I may be slightly off but on the May day bank hoilday I reckon that there were more than 160 planes flying ove my head, Oh what a horrible day.

Sunny days and Sundays always get me down.

7/

Building the technology park as suggested means all people working there will have to arrive by car as there is no bus service there and its impossible to walk from davis estate to it across the airfield. build the inovation park on the 02/20 as there is already an entrance at davis estate by homebase and the infrastructure is already there for it. people will be able to move to davis estate and Horsted park to live and then walk to work, are we are trying to help the enviroment ,or dont you care.

8/

There is so much talk about the airport which Councillor A Jarret is so keen on or I might say fanatical about, with the innovation centre being so good for the area, but as I understand there have been no innovations at the innovation centre, in fact it would seems that medway council are using it as council offices. What a waste of council money.

9/ Attached 2 Videos

Vid01 showing how much the airfield has been built on since its conception and housing added under the flight path since 1939.

Vid02 A glance at my view of the aircraft flying over me one sunday a year ago.

12/

Having worked at BAE systems in the towers many years ago overlooking the airfield I'm surprised how many accidents i have seen , but have gone unreported anywhere, all kept very quiet. The plane that would have ploughed into marconi way if not for the bank. the plane wheels that hit a chimney stack over on the house at the top of city way. The plane that had a collapsed wheel. the plane that had parts fall from it onto the car park, the plane that ended up on the motorway, the plane that run out of runway onto the

rochester road, the plane I saw down city way way in the girls school field (where Friston house is now built) they are the ones  
I'm aware of , there must be many more over the years. I daresay the way the planes are taking risk at the moment, many more  
to come, lets hope nobody dies.

13/  
I have to wear ear plugs in my back garden when I know the planes are flying a lot like today , when there are no flights ,I get taken  
unaware when a loud plane flys in from nowhere with no warning loud and fast. Not surprisingly I suffer from tinnitus (ringing in the ears) at times.

14/  
I feel I deserve a reduction in my rates as the council impose more and more planes over my head and with stated 40,000 a year flying  
over my head I will have to have words with a friend.  
How many people are likely to get compensation I wonder, the planes are annoying all the way down to chatham, especially the gyrocoptors.

15/  
Scary Things

- (a) Spilling tea over my chest with a shock today as the light of my room went out  
for a split second as a plane passed between my window and the sun.
- (b) Today again a plane taking off not yet having passed overhead, spluttered its engine  
was it going to keep going, fortunately it did.
- (c) Planes will cut out completely sometimes in their flight, I am always relieved when I  
hear the engine roar up again, sometime it stays quiet, I have to assume they are ok  
, what could I possibly do, but I still have to wonder.
- (d) Sometimes Planes are very loud in the sky at a very steep climb angles,  
they are almost stationary in the sky and about to fall backwards,  
I suppose that is part of pilot training.  
But why do it over populated parts of Chatham.

16/  
To Re'cap,  
  
I say close 02/20 runway and keep 16/34 runway open.  
  
But do we need aviation in medway at all, my answer NO.  
  
Air flights just seems to be one big fairground ride for the rich.

Its really hot and sunny today, and im sitting indoors writing this proposal, taken several hours of my day, as im told you require it tomorrow. With the sun now pouring in the window , which is shut because im getting a headache from all those noisy plane today.  
On the other hand I can now hear Elain Page singing a love song on the radio,  
"You must love me?".

Regards L Ellison

[Futuremedway@medway.gov.uk](mailto:Futuremedway@medway.gov.uk)

19.06.2018

**Future Medway Local Plan 2012 to 2035**

We have reviewed the development strategy consultation documents; the plan seeks to deliver an enormous increase in housing numbers to respond to the projected growth in population in Medway

As a small/medium housebuilding enterprise we support the projected housing growth, this we hope will provide opportunities to support the growth of our business as Medway is part of our plans to significantly grow our company.

However, we have concerns over the delivery and allocation of housing land that would support / assist SME's to deliver the Local Plan housing numbers. The output required with the lack of housing completions in the first 6 years of the plan now means an annual delivery of approximately 1568 new homes every year. It is noted that large areas of land have been identified to deliver housing numbers, an example being the growth of Hoo St Werburgh which is significantly concentrated on land in two ownerships will not offer the opportunity of delivering large numbers unless the planning authority can find a mechanism to ensure that these larger tracks are constructed by several developers.

We would welcome smaller housing land allocations being targeted at SME's to deliver homes as we feel that the larger national housebuilders will fail to deliver the housing numbers required to meet the Housing delivery targets. It is therefore incumbent on Medway to have a strategy to secure housing delivery which we feel can be met by encouraging SME's to build homes in Medway.

Can the planning authority condition delivery by phased consents with strict timescales to start construction so that multiple phases are commenced on the larger sites which might force the sale of land to several housebuilders including SME's.

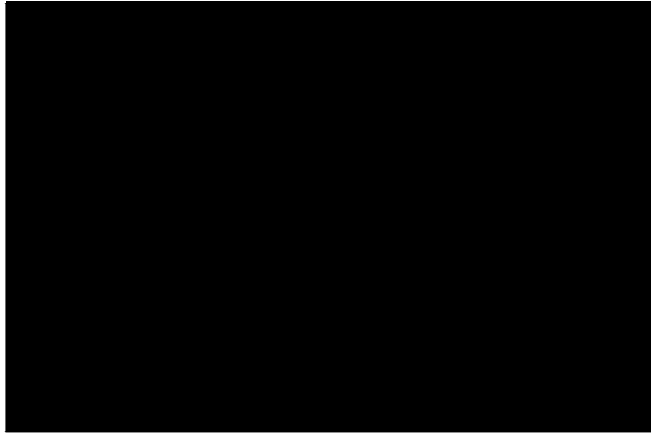
Having discussed the housing delivery we must ensure that the infrastructure to support increasing housing numbers is delivered in advance of housing occupations with regards to increased transport links / services, such as passenger railway service on to the Hoo Peninsula. Schools to be provided in timescales to meet need as it increases, as should other services such as doctor's surgeries. But it is not just about infrastructure it also requires skilled staff to deliver services. In health care it is the recruitment of trained doctors that is more critical as Medway has a significant shortage which is affecting the health of Medway's population.

It is understood that Medway have applied for an infrastructure grant from Central Government in the sum of approximately £170 million whilst this is welcomed it is felt this will leave a shortfall to

deliver infrastructure to support the plan. How will the shortfall in funding be addressed early to meet need, section 106 payment are very much geared to completions of homes this is too late. The plan must set out how infrastructure will be delivered and funded in advance of requirement.

Yours Sincerely

Chris Sparks



**maryott, kyle**

---

**From:** [REDACTED]  
**Sent:** 25 June 2018 10:11  
**To:** futuremedway  
**Categories:** Blue Category

To the Planning Team, Medway Council

I would like you to consider what you are doing and I don't doubt intend to do, to what once was a great community and great place to live - HOO ST WERBURGH.

When we moved here in the late 60's we had TWO policemen living in the village, they knew nearly everyone. I know this can never happen again but just a sighting of one occasionally would be a deterrent for some of the hooligans and drug dealers in the village. I would never go to the shops in the evenings now.

I have seen the village grow out of all proportion to the services available, and you STILL want to build on the very few amenities left. You cannot go on dumping housing on every available piece of land here. Even the golf course is well under threat, another amenity that could be a useful exercise area for the growing (girthwise as well) population of Medway.

I am disabled and with so many people in the village now find it often impossible to park to go shopping, there are no disabled parking spaces so I resort to the double yellow lines, which I know annoys all the extra car drivers. Who, by the way, do not have driveway parking in their newly built homes.

I cannot understand why you find it impossible to get your heads round the fact that suitable amenities should have been put in place first, doctors, better bus service, etc.

There are so many empty industrial sites in Medway that could be cleared and used for housing, but it's the old one isn't it, cost too much, too much effort - let's use green fields (don't worry about underground streams etc or that we are using the land at the moment to provide food) just let's meet our target in building.

Maureen Bryant  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 25 June 2018 09:34  
**To:** futuremedway  
**Subject:** Local plan for house development on the Hoo Peninsula  
  
**Categories:** Blue Category

To whom it may concern,

I was born in Hoo and grew up in what seemed to be very much a village with local people, small amenities and a community. I moved away for some time when I reached adulthood. 5 years ago I chose to move back to the village which had grown some large housing estates on the orchards I used to walk through as a child but the village seemed to cope with the growth and the proximity to countryside still made the place appealing to buy in to.

I am very concerned about the plans for development of additional housing on Hoo Peninsula and particularly in Hoo village. The village is already becoming difficult to get around with too many houses and too many cars and not enough space to park. Cars litter the pavements and block main through roads (Main Road and Bells Lane). The local council seems to pay no attention to adding parking restrictions so that residents can drive safely in and out of the village. Further development can only exacerbate this problem.

I work in London and have to drive back on to the Hoo Peninsula each evening. The traffic converging on the Four Elms Hill Roundabout is already far too heavy with the existing residents. Again, what will become of this when more people live on the Hoo Peninsula?

My family and I are registered with the Hoo St Werbergh Medical Practice and we can never get an urgent appointment and to book in for a consultation requires booking a month in advance. I fear any of us needing to visit the doctor and know that we will likely end up having to use an out of hours service out of the village to get seen.

Hoo is already populated enough for its existing infrastructure and adding more housing will turn what is barely still a pleasant place to live into a village people only want to move out of. I am worried about the value of my house over the coming years as the village becomes overcrowded, under cared for and unappealing.

Kelly Donovan  
Resident of Hoo



**Kelly Stanley**  
Senior Trade Finance Officer

**SOCAR Trading (UK) Limited**  
[REDACTED]



Any information transmitted by means of this e-mail (and any of its attachments) is intended exclusively for the addressee or addressees and for those authorized by the addressee or addressees to read this message. Any use by a party other than the addressee or addressees is prohibited. The information contained in this e-mail (or any of its attachments) may be confidential in nature and fall under a duty of non-disclosure. SOCAR Trading shall not be liable for damages resulting from the use of electronic means of communication, including -but not limited to- damages resulting from failure or delay in delivery of electronic communications, interception or manipulation of electronic communications by third parties or by computer programs used for electronic communications and transmission of viruses and other malicious code.

**From:** [REDACTED]  
**Sent:** 25 June 2018 10:10  
**To:** futuremedway  
**Cc:** [REDACTED]  
**Subject:** medway local plan

**Categories:** Blue Category

We wish to object to the plans for a further massive expansion of housing in Hoo. Our reasons for this are:

the village has seen more than its fair share of housing development over the last 20 years with large new housing estates being built to the east of the village without any increase in amenities.

there is already a total inadequacy of medical facilities in the village, such that it is almost impossible to get a quick doctor's appointment and waits of 3 - 4 weeks are not unusual. The plans do not appear to insist that developers provide additional medical/health facilities.

the current road infrastructure is totally inadequate to support any significant increase in traffic, evidenced by the two recent, separate, month-long closures of Bells Lane this year which caused queues of traffic in Main Road in busy periods (which was undergoing roadworks at the same time) leading to increased air pollution in the area. The plans do not appear to indicate any major road infrastructure improvements to deal with the increased traffic.

Unfortunately it appears that Hoo has been selected for such major housing development as it is 'out of sight and out of mind' and all this development is totally unacceptable.

M & P White  
[REDACTED]

**maryott, kyle**

---

**From:** [REDACTED]  
**Sent:** 25 June 2018 10:12  
**To:** futuremedway  
**Cc:** [REDACTED]  
**Subject:** Re:- Development Strategy Public consultation public feedback  
**Categories:** Blue Category

**Please can you acknowledge our email.**

**Dear futuremedway@medway.gov.uk**

**We wish to comment on specific proposals affecting Rochester Airport that are contained in Medway Council's development strategy document regarding the new Policy T4 for Rochester Airport :-**

**"Policy T4: Rochester Airport**

**Rochester Airport will be safeguarded to provide an enhanced aviation facility for business, public service, training, heritage and leisure uses, and support the development of a strategic gateway and an economic hub.**

**Proposals will need to demonstrate how any impacts will be mitigated, including air quality, noise, traffic, and amenity"**

**Question T7:**

**Do you agree with the proposed policy for aviation in Medway?**

**What alternative approach would you propose for planning policy for aviation in Medway?**

**Our response:-**

**We do not agree with the proposed policy for aviation as currently published .**

**My wife and I are very concerned that the closure of the 16/34 cross runway will be extremely dangerous for local residents, users of the high speed railway, the M2 motorway and those using the airport without any independent public safety risk assessment report being undertaken and implemented.**

**The recently approved funding from SELEP of £4.4 million to provide new hangars, control tower, fuelling, parking etc etc and the reduction to one runway will very significantly intensify the numbers of aircraft departing and landing resulting in the local area being burdened with noise and endanger lives.**

**The removal of the cross runway does not give pilots safety related choices to land hence it is critically important that an independent public safety report is carried out and implemented. It is our understanding that the CAA are not responsible for public safety.**

**I attended the recent SELEP meeting and saw the changes that Medway Council made in their reapplication to the South East Local Enterprise Partnership for £4.4 million of government funding. The Medway Council's reapplication for clarity in reading our email stated:-**

***“4.36 Under the revised project proposals the number of flights undertaken will be dependent upon the weather conditions, as is currently the case. As the revised planning application will not incorporate any changes to the runway infrastructure, it is expected (subject to confirmation from a planning consultant) that the requirement to further investigate the impact on public safety and the environment will be removed from the planning process. However, these factors will continue to be monitored through other mechanisms including the CAA (safety) and Medway Council (air quality)”.***

**We are extremely worried that despite changing the format of the airport ( ie closing one of the two runways ) that Medway Council are seeking not to have an independent public safety study being carried out, completed and its results being implemented despite proposing to close the cross runway, keeping the runway which flies over densely populated residential communities, schools and businesses open .**

**How will Medway Council mitigate any impact as stated in the draft Local Plan T4 policy (above) if they do not commission or require to be commissioned a public safety report.**

**Medway Council have not yet sought nor has it been given a mandate from the public for the current aviation policy and specifically the changes to Rochester Airport.**

**Why has the option to close Rochester Airport and redevelop the entire site been omitted from the revised Rochester Airport Technology Park business case given that it is important to ensure Value for Money is delivered from publically funded projects and that:-**

- Public consultation on the Rochester Airport redevelopment returned 908 responses, 90% opposed the plan and 80% said scrap it.
- The airport operator has shown it is unwilling to pay for the very recent overrun of costs for the paved runway which Medway council's planning authority had been told was required to mitigate the additional noise the increased number of flights will cause and to provide increased safety for pilots, however the paved runway is now not included in the airport's redevelopment plan.
- The airport reconfiguration (ie loss of the second runway ) has not been proven to be safe for the public nor the pilots using the new arrangements.
- The 25 year airport lease contains a deed of revocation which permits the airport operator to walk away from the contract with no penalty;
- The adopted Medway Local Plan and saved policies do not safeguard the airport or continuation of flying at the Rochester airport site;
- The adopted Medway Local Plan and saved policies permit the airport land to be used for a Technology Park without limitation on the scope or size of development;
- The airport has no national heritage or official historic status;
- Rochester airport is one of two general aviation sites in Medway so leisure and sports flying will be retained in the area should Rochester airport be closed and redeveloped;
- Greater social, economic and environment value for money could be achieved by the full use of the site without an airport;

#### AND THAT

- The closure of the cross runway and the continuation of flying at Rochester airport has been expertly proven to increase noise impact to local residents;
- The mitigation of risk and environmental impact attributed by Medway Council and Rochester Airport Limited to a paved runway is no longer applicable;
- There is no business model for the revised airport investment which evidences financial viability of the site as a long term operational airport with or without out a paved runway.

Please do not publish our address or names.

Thank you,

[REDACTED]

[REDACTED]

25/6/18

**From:** [REDACTED]  
**Sent:** 25 June 2018 10:12  
**To:** futuremedway  
**Subject:** Local plan for house development on the Hoo Peninsula  
  
**Categories:** Blue Category

To whom it may concern,

I am very concerned about the plans for development of additional housing on Hoo Peninsula and particularly in Hoo village. The village is already becoming difficult to get around with too many houses and too many cars and not enough space to park. Cars litter the pavements and block main through roads (Main Road and Bells Lane). The local council seems to pay no attention to adding parking restrictions so that residents can drive safely in and out of the village. Further development can only exacerbate this problem.

I work in London and have to drive back on to the Hoo Peninsula each evening. The traffic converging on the Four Elms Hill Roundabout is already far too heavy with the existing residents. Again, what will become of this when more people live on the Hoo Peninsula?

My family and I are registered with the local doctor's surgery and to book in for a consultation requires booking a month in advance. I fear any of us needing to visit the doctor and know that we will likely end up having to use an out of hours service out of the village to get seen.

Hoo is already populated more than enough for its existing infrastructure and adding more housing will turn what is barely still a pleasant place to live into a village people only want to move out of.

Regards,

Lee Donovan.  
[REDACTED]



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

BY EMAIL TO [FUTUREMEDWAY@MEDWAY.GOV.UK](mailto:FUTUREMEDWAY@MEDWAY.GOV.UK)

29011/A3/GW/SS  
25 June 2018

Dear Sir / Madam,

MEDWAY COUNCIL LOCAL PLAN - DEVELOPMENT STRATEGY CONSULTATION  
REPRESENTATIONS ON BEHALF OF ROPEMAKER PROPERTIES LTD

We have been instructed by our client, Ropemaker Properties Ltd to make representations on the Medway Local Plan Development Strategy published for consultation in March 2018.

Our client is the freehold owner of Strood Retail Park ('the Retail Park') which sits alongside Strood District Centre. It has long been recognised that the Retail Park performs an important role (alongside the foodstores located to the south and west) in drawing trade to the District Centre and supporting its on-going vitality and viability. As noted within the North Kent SHENA, it *'has a functional relationship with the district centre, and indeed offers an opportunity for the vitality and viability of the wider centre to be improved'* (para 5.69). Similar observations concerning the role of the Retail Park alongside the District Centre are also made at paras 8.5, 10.35 and 10.41 (North Kent SHENA, 2016).

Given the above, it is therefore surprising that the North Kent SHENA goes on to *'strongly advise that Strood Retail Park and the edge-of-centre foodstores are not included within the district centre boundary'* (Para 10.41). This is entirely **at odds with the Council's** objective to strengthen the role of Strood district centre and its on-going vitality and viability which, on the Council's own evidence, is reliant on the success of the Retail Park. It is therefore fundamental that the retail strategy for protecting and strengthening Strood gives due consideration to the contribution made by Retail Park and that the defined centre boundary is extended to include the Retail Park so that it may not be unduly prejudiced against delivering sustainable enhancements to its retail offer that will serve to benefit the district centre to which it so clearly relates.

**We would also make the following observations on the Council's proposed approach to the following:**

Policy RTC2: Sequential Approach

The NPPF requires Local Planning Authorities to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up to date plan. Main town centre uses should be located in town centres; then in edge of centre locations; and only if suitable sites are not available should out of centre sites be considered.



Registered in England  
Number: OC342692

Barton Willmore LLP  
Registered Office:  
The Blade  
Abbey Square  
Reading  
RG1 3BE  
F/ +44 (0)118 943 0001

There is no provision within the NPPF to apply a hierarchical approach to in-centre locations and as such the **Council's proposed approach to prefer Chatham above the district centres (including Stood)** is not in accordance with the NPPF and therefore not sound.

It is part and parcel of the application of the sequential test that consideration be given to the likely catchment area that the proposed development will serve. Whilst it would be considered best practice to agree a catchment area with the Local Authority as part of pre-application discussions, we consider the inclusion of this as a policy requirement to be unduly onerous. **It should instead be 'encouraged'.**

#### Policy RTC3: Impact Assessments

The proposed policy approach to impact assessments needs to be simplified and should accord with the tests set out within the NPPF. For example, there is no provision within the NPPF to apply additional impact tests i.e. impact on the strategy - and this should therefore be removed.

#### Defined Centre Boundaries

The Council has imitated at paragraph 6.23 that the centre boundaries as defined in the 2003 Medway Local Plan may require review as part of the new Local Plan. We would agree that this be the case and, as highlighted above, in respect of Strood due recognition should be given to the role of the Retail Park in supporting the vitality and viability of the district centre by way of its inclusion in the defined centre boundary. This is clearly **substantiated by the Council's retail evidence and to exclude the Retail Park would be to hamper** the key objective to protect and strengthen the vitality and viability of the district centre.

#### Policy RTC12: Retail Parks

There is no provision within the NPPF to plan for retail development within out-of-centre locations and this policy is not therefore sound. Furthermore, in respect of Strood Retail Park, the Retail Park is unique in terms of its clearly acknowledged role in contributing to the health, vitality and viability of Strood district centre. It should therefore be duly included as part of the district centre for the reasons highlighted above.

We trust these comments will be duly considered as part of the plan making process. If you have any queries, please do not hesitate to contact either myself or Susie Stephen at this office

Yours Sincerely



GRAEME WARRINER  
Planning Director

**From:** [REDACTED]  
**Sent:** 25 June 2018 10:16  
**To:** futuremedway  
**Subject:** Development Strategy

**Categories:** Blue Category

To Catherine Smith  
Planning Manager – Policy

Development Strategy Section 2  
Vision & Strategic Objectives.

2.2 As quoted births may have outnumbered deaths, but much of Medway's growth has come from outside Medway, making it harder for the indigenous population seeking housing. London has more than enough land for their housing needs, and has many thousand planning permissions outstanding.

2.6 Why LONDON in the title of Medway Commercial Park at Kingsnorth? Duty to cooperate taken to the extreme!

2.7 For all the reasons in this paragraph, the Council should inform the Government in no uncertain terms that the housing figure that they expect Medway to build is far too high. The Localism Bill appears meaningless if the Government can enforce numbers on an area; exacerbates all the problems people are experiencing now.

As stated in 2.4 there are marked inequalities in health, with life expectancy shorter for residents of Medway. Surely this must be a sign the area is overpopulated already, with all that entails ! 2.16 Hope the Health & Social Care Plan will help.

2.9 As answered in the " Development Options Reg. 18 consultation " I do consider Frindsbury & Wainscott have lost much of the Character of the area through the many homes built; it would be a shame if Hoo lose their distinct sence of place also.

Thames Gateway Kent Plan for Growth 2014-2020.

2.19 3rd Bullet point. --- where the benefits of development and investment are shared by the WHOLE community. Would be nice if those businesses who benefitted by the Wainscott by- pass could contribute towards a Pedestrian Bridge, to reinstate the walk in Stonehorse Lane. Would help fulfil the last bullet point in the 4 strategic priorities in 2.21. Wellbeing.

2.19 4th bullet point. A growing student population is I feel a mixed blessing. When the University was first discussed in the late 90's it was said most students would come from local inhabitants. Now it seems student numbers are affecting housing provision.

Development Strategy Section 3.  
Defining Development Needs.

3.4 Why ? when Medway is already one of the largest urban areas in the south east is it expected to take such a high house build figure, ie 29.463 in a span of 23 years, when 2006-

2026 ( 20yrs ) Medway had a requirement figure of 16,280 homes; this was a combination of Kent Thames Gateway area and part of the rest lying in Medway south of the M2.

Published in March 2018 it is stated The Housing, Communities & Local Government carried out a consultation on housing need . They worked out Medway would need to build between 730-1410 properties a year. Maybe the lower figure is more correct as population growth has slowed down in recent years ( 3.6 ). Government should take a leaf out of Mr Shaun Spiers book “ How to build houses & save the Countryside “

3.7 Government should think again about the Methodology used for this area, evidently it is not a fair system. Numbers quoted of 37,143 should be strongly resisted by the Council. The Standard Method seems more simple to understand, until c) when I don't agree with the Governments statement ie. “ Affordability of new homes is the best evidence that supply is not keeping up with demand”. The house prices are high because many have been bought by Executives and people from London; although prices are high they are still cheaper in Medway than can be purchased in the Capital. Not sufficient affordable houses have been built.

3.42/3 Transport solutions, I agree as was suggested at the workshop meeting on the 20th June 2018, that the Grain railway line makes sense to connect to Strood station, could serve local needs also further afield.

3.52/3 Appears to be mixed messages concerning Lodge Hill. In Scenario 4 it states the scheme does involve elements of development on designated SSSI land. And at 3.18 Scenario 1” Meeting Objectively Assessed Need.” It states there is no development proposed on land designated as SSSI at Lodge Hill or Deangate, and buffers to land protected for its environmental importance are recognised. I support Mr I Burt's MCF representation on Lodge Hill and request removal of Lodge Hill from the Local plan.

Medway 2035

Transforming Medway's Waterfront.

Disappointed with Temple Waterfront so far. Trust Rochester will be better.

Strood Waterfront.

Aveling & Porter building was a nice Gateway to Strood from the South. So do hope what is planned will be a worthy replacement.

Chatham Waterfront.

I was unable to respond to this planning proposal. It would have been nice to have kept the open aspect, so do hope it is developed with some views over the River for the public as well as residents.

Medway 2035 Draft Regeneration delivery.

It states on page 51- Medway 2035 is a flexible working document ready to respond rapidly to emerging intelligence in the pursuit of HEALTH and prosperity for ALL. Also states Medway Council has a strong track record of delivering major projects. PLEASE remember the small projects also ie. Promised Stonehorse Lane Pedestrian Bridge in the pursuit of health & wellbeing. It was stated at the time of the Inquiry in 2000 that when funds were available it could be built outside the Local Plan.

Habitats Regulations Assessment.

I am pleased most proposed policies do not have implications for the HRA ; but I cannot understand by charging a tariff how this will mitigate. Where implications are involved would hope the “ Green Infrastructure “ and “ Air Quality “ Policies will safeguard. Trust the Habitat Regulations will be safeguarded also.

I have read the the Sustainable Appraisal of Development Scenarios & Draft Policies but with the time I have had available am unable to make meaningful comments . Just hope the purpose of the SA is carried out and Development in the area is SUSTAINABLE.

Judith Masey  
FWCA Mem. Sec.

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

Date: 25<sup>th</sup> June 2018

## Richard MacDonald Bridge

Dear Sirs

### Local Area Plan

I have attended a number of presentations on the above, and have some serious concerns about the process as currently promulgated.

The first and underlying basic issue is political. The constraints that drive many of the approaches to the draft plan are political – matters of political will and funding. Yet there is no nod even to the possibility that the political control of Medway Council may change in 2019, or that the Westminster parliament may become controlled by the Labour Party in (probably) 2020. I will expand somewhat on this. Many proposals are conditioned by the need for the private sector to build houses, and indeed to fund necessary infrastructure provisions. That in turn means that the private sector needs to build in areas of higher property prices, and incredible that it may seem, that includes Medway. That is why the central government demands such a huge amount of housing provision to be in Medway – high prices, entrepreneur profit, contributions can be extracted to fund (or of) infrastructure.

But if the local authority is controlled by the Labour party the will will be there (if funding can be found) to provide proper council housing. There might be ways to find or increase funding. And if central government becomes controlled by the Labour Party then it is a carrot to Lombard Street that restrictions on councils funding social housing will hugely relax, and indeed central government funding for local councils will most probably vastly increase. Then housing, on a comparable timescale to that of the draft Local Area Plan, will or at least may be materially, perhaps overwhelmingly (at least at the level of social housing) provided by local or central government. And housing provision would not need to be concentrated in areas of higher prices. And the increase in provision might very well lower prices: a virtuous circle. This would put a wholly different complexion on Medway housing. The possibility or possibilities should be addressed.

Now, assuming that either the lower or the higher figure (from the draft) of housing provision is not reduced by the possibilities canvassed above there are two questions. One is where to put the new houses for the people. Houses for the wealthy are not such a problem. There are fewer. The private market can and will (for profit) provide. The second is how to provide services for them and their occupants. The latter influences the former.

There have in the past been (I gather) several failures to ensure that money provided or allocated for infrastructure development was spent on that specific infrastructure. That must be (and has not been) addressed. The example I hear most often raised is the A228. A road with fairly suitable capacity (for current housing and industry) has been built as far as the roundabout after (going out of the Medway Towns) Angel Farm. Thereafter the roads outwards are somewhat but not much better than minor country roads. But the better roads from the A289 to Angel farm will be inadequate for more housing (and industry) and the minor roads will be impossible. A lot of money was wasted on an entirely unnecessary flyover – which in turn is a bottleneck to rail service enhancement. Roads must be funded and put in place in advance of need.

If there is to be significant housebuilding on the Peninsula, there are several things needed.

Jobs. Where are plans to create jobs, not just Mcjobs, but serious jobs on the Peninsula? This will become much more urgent as Brexit (if proceeding) impoverishes the country. It will impact more severely the areas



that depend most on the EU. These fall into two camps: those nearest the EU (including Medway) and those most subsidised by the EU. Who will provide worker intensive businesses in Grain and in Hoo? Then there are commuter (using the term broadly) jobs. How can people travel from the Peninsula to Medway or to London? The A228/289 junction is a deathtrap at high traffic times. Traffic approaches mostly at motorway speeds or close – to standing traffic. What about rail? Buses from the Peninsula to the Medway Towns are a theftuous disgrace.

Road: - Are there plans for a sliproad from the A289 (from London) to 4 Elms Hill? How will it get under the Army bridge? Will it stead go round the old army housing and land to join up with the A289 near the junction for Kingsnorth, or at Christmas Lane, or at Fenn Bell Corner? What about a link more directly from the Medway tunnel? The mere fact that I am asking these questions indicates that they have not properly been addressed. What about road links for any increased building near Lordswood? What about the increasing traffic jams near Strood bridge?

Rail: - How can the rail link from Hoo Junction (from Gravesend) to the peninsula be expanded? There are width problems in many places.

Not only are there apparently no plans for improved road and rail and bus transport – there is no illumination of how to lock in funding, nor, mirabile dictu, of how to ensure that provision is in place before people move into houses.

Then there are other aspects of infrastructure provision. Where are there to be schools? Not private provision of academies, but real schools? Where are there to be GP surgeries and other access points to healthcare? There appears to be no plan to ensure that these are timely in place before the existing services are overwhelmed (a brink on which they are at present teetering). What about water? Medway is I gather an area of water stress – with pressures on the ability to supply drinking water. And there are several areas where it is shatteringly obvious that foul drainage (and rainwater runoff) are simply inadequate. This goes unaddressed.

So far the plans seem to be to give the private sector power to make enough money to provide houses on the peninsula for people with no children, no cars, and no health problems. For these reasons approach 2 (for a townscape in Hoo) is foolish.

So, having looked at the inadequacies of plans to put houses on the Peninsula – why is the Peninsula being singled out? Could it be that hardly any Medway Councillors live there? Why are houses in urban areas planned to be crammed into flood plains and how will they be insurable?

This brings me to Approach 3. It has some virtue – diversity. But its folly (and that of approach 1) is the absence of any mandatory floodproofing. That and the demolition of existing satisfactory housing to make space for yuppie highrises that will do nothing at all for local needs.

I therefore assert that none of scenarios 1, 2, 3, or 4 make sufficient sense. A greater effort to find brownfield land that is not susceptible to flooding, and for which infrastructure can AND MUST be provided would be the only sensible way forward.

Yours, etc

**Richard MacDonald Bridge, B.A, B.Sc., retired solicitor.**



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

**By Email only:** [futuremedway@medway.gov.uk](mailto:futuremedway@medway.gov.uk); [catherine.smith@medway.gov.uk](mailto:catherine.smith@medway.gov.uk)

25 June 2018

Dear Ms Smith

### **Consultation on the Medway Council Local Plan Development Strategy 2012 – 2035**

---

The RSPB is grateful for the opportunity to contribute to the Development Strategy consultation as part of the process of preparing the Medway Council Local Plan 2012-2035 ("the Consultation"). We remain committed to trying to help Medway Council secure a sound Local Plan, for the benefit of all.

Please note that, as with previous consultations on the Medway Plan, some of our comments concern several points and therefore do not fit easily within the specific questions set out in the Consultation. In addition, we do not have comments on all the issues in the Consultation. Therefore, we are responding by letter rather than by using the online form. However, as before, we have sought to structure our response in a format that is consistent with the way the consultation is set out in order to make it clear to which parts of the document we are responding. Please note that our response should be read in conjunction with letters sent to Medway Council during the consultation period, namely letters dated 5 April 2018, 16 April 2018 and 11 May 2018, which we have included as appendices to our Consultation response.

**South East England  
Regional Office**

1st Floor, Pavilion View  
19 New Road  
Brighton  
BN1 1UF



[rspb.org.uk](http://rspb.org.uk)



The RSPB is part of BirdLife International,  
a partnership of conservation organisations  
working to give nature a home around the world.

**Patron:** Her Majesty the Queen **Chairman of Council:** Kevin Cox **President:** Miranda Krestovnikoff  
**Chief Executive:** Dr Mike Clarke **Regional Director:** Nic Scothern

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

### 1. The RSPB's interests in Medway

The RSPB is a significant landowner and land manager in Medway Council's area. We have nature reserves at Cliffe Pools, Northward Hill, Nor Marsh and Motney Hill (857 ha in total). The northern part of the Council's area lies within the Greater Thames, a national priority landscape for the work of the RSPB. This is one of our highest priority places in the UK for the promotion of conservation at a landscape-scale, adopting the principles advocated by the Lawton Report *Making Space for Nature* (2010), which recommended (in simple terms) more, bigger, better and more joined up protected areas.

A substantial part of the Council's area is subject to statutory nature conservation designations. This includes the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site, the Medway Estuary and Marshes SPA and Ramsar site, the North Downs Woodlands Special Area of Conservation (SAC), the Medway Estuary Marine Conservation Zone (MCZ) and a number of Sites of Special Scientific Interest (SSSIs). Among the SSSIs is the large (351 ha) Chattenden Woods and Lodge Hill SSSI, which is designated for supporting a nationally important population of the red-listed nightingale, along with rare grasslands. Indeed, the site has been identified as holding *the* most important population of nightingales nationally<sup>1</sup>, and is the only site designated specifically for them. The RSPB regards the protection and enhancement of the SPAs and their underpinning SSSIs, along with the protection of the Chattenden Woods and Lodge Hill SSSI, as being among the highest priorities for our work nationally.

### 2. Section 2: Vision and Strategic Objectives for the Local Plan

The RSPB **welcomes** and **supports** the Vision set out on page 19 of the Consultation: *"By 2035 Medway will be a leading University waterfront city of 330,000 people, noted for its revitalised urban centres, its stunning natural and historic assets and countryside."*

We **strongly support** the commitment to the conservation and enhancement of the natural environment through coordinated working at a landscape scale, set out in para. 2.27, including the work of the Strategic Access Management and Monitoring Scheme (SAMMS). We **welcome** the recognition of the Council's custodial duty to conserve and enhance the natural environment, in particular designated habitats and landscapes, as set out in para. 2.40. ***However, this custodial duty would be fundamentally undermined by any allocation of development that led to damage, directly or indirectly, to the Chattenden Woods and Lodge Hill SSSI.***

We **broadly support** the Strategic Objectives set out in para. 2.43.

---

<sup>1</sup> Hewson CM, Miller M, Johnston A, Conway GJ, Saunders R, Marchant JH, Fuller RJ. 2018. *Estimating national population sizes: Methodological challenges and applications illustrated in the common nightingale, a declining songbird in the UK*. Journal of Applied Ecology; Vol 55(4): 2008–2018

### 3. Section 3: Development Strategy

#### **Comments on the Council's overall approach to allocation of land for development**

The Consultation presents four alternative development scenarios, largely focused on the spatial distribution of housing land. The way this section is presented represents some improvement over the corresponding section in the Development Options consultation (2017), insofar as the information on Component of Land Supply and total Number of dwellings for each scenario is clearer, although in the absence of a revised Strategic Land Availability Assessment (SLAA), or at the least an update report, it is not clear how these totals were arrived at, which is a considerable barrier to understanding the options and comparing their merits. We welcome the fact that the status of the Lodge Hill site as a SSSI is this time acknowledged, rather than previously when it was not mentioned.

However, we remain **deeply concerned** about the approach adopted with regard to compatibility with the National Planning Policy Framework (NPPF) and the principles of sustainable development on or adjacent to nationally and/or internationally important sites for nature conservation. In particular, it still does not appear that the Avoid, Mitigate, Compensate hierarchy has been followed, as was made clear by the previous Local Plan inspector, and which we and many others have flagged previously. We set out our concerns in detail below.

#### ***Unexplained major anomaly within screening process***

In the RSPB's response to the previous Development Options consultation, dated 13 April 2017, we drew attention to the inconsistent application of the criteria for screening potential housing development sites. In particular, Stage 3 of the SLAA screening process, which removed sites if they had environmental designations such as SSSIs, SACs, SPAs, Ramsar, Area of Outstanding Natural Beauty and ancient woodland, was applied inconsistently. Chattenden Woods and Lodge Hill SSSI ("the SSSI") was allowed to proceed to Stage 4, in contrast to other potential sites with heritage designations being screened out, along with other areas of land without designation. This remains unexplained, and inexplicable. We refer you to our arguments in previous rounds of consultation (attached), which remain unchanged.

#### ***Implications of NPPF for SSSIs***

The RSPB acknowledges the challenge faced by the Council in identifying sustainable locations for the delivery of housing supply adequate to meet Objectively Assessed Need (OAN). Clearly, this challenge is more acute if the aim is to meet the Government's proposed Standard Method calculation of Local Housing Need. Notwithstanding these considerations, the starting point for considering scenarios for the delivery of housing (and other development) is the NPPF and, in the context of the Council's custodial duty to conserve and enhance the natural environment, the provisions in paragraph 118 thereof.

Paragraph 118 states:

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

Each of the four alternative Scenarios presented in this section would include housing development in close proximity to (and indeed directly abutting) the boundary of the Chattenden Woods and Lodge Hill SSSI and in the case of Scenario 4 the construction of a substantial number of dwellings directly within the SSSI. The provisions of paragraph 118 are accordingly of the utmost importance in assessing the acceptability or otherwise of each Scenario.

We have set out our specific comments on each Scenario below, but there are a number of common themes. Because nightingales are a ground nesting (or near-ground nesting) species that is vulnerable to all manner of urban disturbance, any allocation for housing development right next to the SSSI is extremely likely to be highly damaging to the nightingale population, and could not be considered to be sustainable development (a point we expand upon in Section 1212 below), nor to have met the tests set out in the NPPF.

Accordingly, the first sentence of paragraph 118 is very pertinent: *“Proposed development on land within or outside a SSSI likely to have an adverse effect....should not normally be permitted.”* Given the likely impacts arising from development we would therefore expect to see a considerable land gap between any allocation boundary and the boundary of the SSSI, the precise size of which should be determined through collaborative discussion between expert parties. We would also expect to see a simple policy statement in the Local Plan that explains this, and the factors that developers need to take into consideration when proposing development in proximity to the SSSI.

We have reviewed the *Interim Consideration of the Implications of Development Strategy Scenarios on European Sites* (Arup, March 2018), hereafter referred to as the Habitats Regulations Assessment (“the HRA”) and the *Medway Local Plan Sustainability Appraisal* (Arup, April 2018) (“the SA”) and our detailed comments on the latter are contained in a separate section below. We have where appropriate made reference to them in our specific comments on the development scenarios.

### ***Housing targets***

We know that Medway Council has made it very clear in Cabinet meetings and public statements that the Council does not accept the Government's Standard Methodology, yet we also understand that the government expects the Standard Methodology to be followed. This makes it is very difficult as a consultee to know whether the four options presented are true options, or whether the three using Medway's preferred methodology are going to prove to be a false choice. We also note that if the Council is required to apply the Government's Standard Methodology the approach that it has adopted in this consultation document means that it is effectively not consulting on alternative scenarios as only one of the scenarios considers this situation. It would have been helpful to have provided some guidance as to how that uncertainty should be dealt with.

### **Comments on the four Development Scenarios**

#### ***Scenario 1: Meeting Objectively Assessed Need***

This Scenario seeks to meet the Objectively Assessed Need for the provision of 29,463 dwellings over the plan period, identified in the 2015 North Kent Strategic Housing and Economic Needs Assessment (SHENA).

Whilst the Scenario does not envisage direct land take from the SSSI in the form of development within its boundary (which we welcome), it would entail extensive housing provision in immediate proximity to the boundary. Accordingly, from experience with other sites where development has occurred close by, we consider that the SSSI would be the subject of significant urbanising effects, including disturbance, lighting,

and an increase in the level of predation by domestic cats on ground nesting birds, including breeding nightingales, the key interest feature of the SSSI.

Notwithstanding these considerations, the SA concludes with regard to Objective 6: *To protect and enhance biodiversity features* that the overall impact of the Scenario is 'neutral' (paragraphs 5.1.1.2 and Table 37, pages 32-33). This conclusion is incomprehensible, as we cannot see how it can be anything but negative or double negative. It strongly infers that the authors of the SA did not take appropriate account of the implications of development in close proximity to the SSSI. We explore our concerns with the SA's conclusions in Section 11 - Sustainability Appraisal below.

### ***Scenario 2: Investment in infrastructure to unlock growth***

Like Scenario 1, this Scenario seeks to meet the Objectively Assessed Need for 29,463 dwellings, whilst accelerating the delivery of a slightly higher number of homes than in Scenario 1 (delivering 31,033 dwellings over the plan period rather than 29,950).

It does not envisage direct land take from the SSSI but the same considerations outlined above about Scenario 1 apply concerning urbanising effects from housing proposed immediately adjacent to the boundary of the SSSI.

The SA concludes with regard to Objective 6 that the overall impact of the Scenario is 'unknown' because of uncertainties about strategies for ecological gain or mitigation against ecological loss associated with management of greenspace or the expansion of the rail network and related infrastructure. Whilst there are indeed uncertainties about these matters, the delivery of such strategies would not itself mitigate or remove the negative impacts of development in close proximity to the SSSI upon breeding nightingales located within the SSSI, and therefore we believe that at the very least the impact of this would be negative. We explore our concerns with the SA's conclusions in Section 11 - Sustainability Appraisal below.

### ***Scenario 3: Meeting Government's proposed calculation of local housing need***

This Scenario addresses the projected housing need arrived at through the government's proposed Standard Method, which leads to a calculated need for 37,143 homes during the plan period. As noted above, it is the only scenario which considers the provision of 37,143 homes, which renders it distinct from the other scenarios.

It does not envisage land take from the SSSI but the same considerations apply concerning urbanising effects to those outlined above regarding Scenarios 1 and 2. The fact that it is able to suggest providing an additional 7,193 dwellings without the need to consider building houses on the Chattenden Woods and Lodge Hill SSSI is of particular importance for Scenario 4 below.

The SA concludes with regard to Objective 6 that the overall impact of the Scenario is 'unknown', for reasons that parallel those mentioned in relation to Scenario 2. We would add a similar proviso about impacts on the SSSI interest features to that mentioned above and we believe that at the very least the impact of this would be negative. We explore our concerns with the SA's conclusions in Section 11 - Sustainability Appraisal below.

Levels of residential development of this magnitude inevitably raise questions about the possible increases in recreational disturbance to the Thames Estuary and Marshes and/or Medway Estuary and Marshes SPAs and the ability of the current strategies in place to mitigate for such increases. We would expect to see these questions directly addressed and solutions found, but we are not convinced that this issue has been



satisfactorily addressed by the Habitats Regulations Assessment (*Interim Consideration of the Implications of Development Strategy Scenarios on European Sites* (March 2018)).

#### **Scenario 4: Consideration of development within Lodge Hill**

This Scenario seeks to deliver the Objectively Assessed Need, but in contrast to each of the other Scenarios it is predicated upon the development of up to 2,000 homes within and immediately adjacent to the boundary of the SSSI, in addition to those in other allocations directly adjacent to the SSSI boundary from the other scenarios. This would probably represent the largest direct loss of a SSSI, by definition a nationally important wildlife site, to development in the UK for at least 20 years. As set out in our general comments above, such a loss would be directly contrary to the guidance in the NPPF and thus contrary to Government policy, unless the derogation in the second sentence of paragraph 118 could be invoked.

The RSPB strongly believes that there are no grounds for departure from the underlying principle of paragraph 118. In our view the benefits would demonstrably **not** outweigh the impacts, as there would be a catastrophic loss of a large part of a nationally important wildlife site and almost certainly a devastating negative impact on a nationally important breeding population of the red-listed nightingale<sup>2</sup>.

In paragraph 3.58 the Council itself acknowledges the weight of the policy:

*“National policy provides **the highest level of protection from development** that would result in significant harm to land designated as a SSSI. The NPPF directs local planning authorities to seek to avoid development likely to have an adverse effect on a SSSI, with the only exception being that the benefits of the development clearly outweigh the impacts on the features of the site, and any broader impacts on the network of SSSIs. **Only where development can not be avoided**, should mitigation and compensation measures be considered.”* (emphasis added)

We have seen nothing within the draft Local Plan that shows that development at that site cannot be avoided. Indeed, we note that Scenario 3 envisages a further 7,193 dwellings within Medway during the plan period **without** recourse to development at Lodge Hill. Given the Council acknowledges the level of protection conferred on the site and the apparent lack of need for this site in order to meet the Council's Objectively Assessed Need we would expect to see compelling evidence justifying a scenario that envisaged potential harm to this site. We have been unable to find any such information within the draft Local Plan or its supporting documentation. There are also demonstrably alternatives to development within the SSSI. Three such alternatives are set out in Scenarios 1-3, albeit that in their current formulation they present indirect negative impacts, as described above. We are not convinced that the inclusion of this scenario constitutes the “transparent and objective assessment of the impacts” that the Council suggests in paragraph 3.59.

We note the Council's assertion in the draft Plan that “A key feature of Medway is the extent of areas that are designated of international or national importance for their biodiversity and landscape value. These indicate areas where development should be restricted in order to protect their special characteristics as outlined above” (paragraph 7.6). We consider that there is a clear tension between this statement and the Council's approach to the inclusion of the Lodge Hill site in Scenario 4. We further note that the Council highlights potential sites which may not need to be released if Lodge Hill is developed in paragraph 3.60. However, given the acknowledged extent of protection conferred upon this site, we consider it is

---

<sup>2</sup> Birds of Conservation Concern 4 (Eaton *et al.* (2014)):  
<https://www.rspb.org.uk/globalassets/downloads/documents/birds-and-wildlife/birds-of-conservation-concern-4--the-population-status-of-birds-in-the-united-kingdom-channel-islands-and-the-isle-of-man.pdf>

inappropriate and potentially misleading to consultees to present Lodge Hill as an alternative to the development of undesignated sites elsewhere in Medway. Additionally, as highlighted in the previous paragraph above, it appears that there are other sites that could come forward as viable alternatives to Lodge Hill.

The SA concludes that Scenario 4 would have minor negative impacts on biodiversity (paragraph 5.1.5.2, page 36) but goes on to say that *“this could be improved through an approach which commits to a comprehensive monitoring strategy that would identify adverse impacts in a timely manner to allow further remediation or mitigation to take place”*. It is difficult to understand how comprehensively monitoring the inevitable decline, possibly to near extinction, of the remaining nightingale population will facilitate *“further remediation or mitigation”*. We also cannot see how the largest direct loss of SSSI in a generation, anywhere in the country, can be classified as a 'minor negative' impact rather than a 'significant negative' impact. We set out our detailed concerns about this in Section 11 below.

We note that removal of unexploded ordnance is cited as a benefit of the proposed scheme (e.g. paragraphs 3.54 and 3.57) but consider that this overstates the level of risk posed as the site is currently closed to the public and by implication the risks are therefore managed appropriately (a point that is actually acknowledged in the SA). In the event that there is an unacceptable risk to the public outside the Lodge Hill site from unexploded ordnance within the site, we consider that this is a matter that needs to be addressed independently of any considerations of potential development on the site. However, if it is safe to leave the unexploded ordnance on the site until planning permission has been granted and implemented then we respectfully suggest that this risk is being overstated – if it is not safe then it should be dealt with now, irrespective of any future development, rather than exposing the public to the continued risk.

The consultation document says that *“Ecological survey work has informed a new proposal for the site that directs development to the western and southern areas, around Chattenden Barracks and Lodge Hill Camp”*. Given that the proposal would take out, by our estimate (based on 2012 baseline survey), 16% of the nightingale territories directly beneath the built footprint, with a total of 73% of the nightingale territories within an additional 400m and 100% of nightingale territories within just 1km of the boundary of the proposal (see illustrative map in Appendix 4), and hence subject to at least some indirect effects, it is difficult to see how ecological survey work can have informed such a proposal, and it is concerning that no background information has been given to consultees to support this statement.

Also, section 3.57 says

*“Homes England has outlined an initial nature conservation strategy based on the ecology surveys and assessments carried out in and around Lodge Hill. The strategy consists of both on-site and off-site measures, with land management for conservation interests, sensitive clearance of unexploded ordnance to secure site safety, and establishment of compensatory habitat for nightingale habitat to address negative impacts arising from potential development. **The nature conservation strategy informs both the location of potential development land and its phasing.**”* (emphasis added)

Given that this makes it clear that the plans presented in the consultation have been based on a strategy, we are concerned that this strategy has not been shared, despite our requests.

### **Conclusions on Section 3**

The Development Strategy set out in this section presents four scenarios for delivery of housing need in Medway. Scenario 4 entails the construction of up to 2,000 dwellings within and immediately adjacent to

land that is designated as the Chattenden Woods and Lodge Hill SSSI, in addition to undefined numbers of dwellings on other allocations directly adjacent to the SSSI, leading to the direct loss of and major indirect impacts to a nationally important wildlife site. This fundamentally conflicts with the guidance set out in paragraphs 117 and 118 of the NPPF. Furthermore, as we have highlighted above, it is demonstrably the case that housing need in Medway, whether based on OAN or on the Government's proposed Standard Method calculation of local housing need, can be delivered without development within the SSSI, as the consultation presents three scenarios that do not include such development.

Also, we note that the proposed allocations in the 2018 Regulation 18 consultation have changed since those in the 2017 Regulation 18 consultation, removing several areas of proposed allocation on non-designated land, yet we can find no clear explanation within the consultation documentation as to why this is the case, and on what grounds these changes have been made. We consider it essential that the changes must be fully explained and justified.

The three Scenarios that exclude development within the SSSI also raise critical issues of indirect impacts upon the interest features of the SSSI which have not been satisfactorily addressed by the consultation document. They are consequently unacceptable as currently presented. Delivery of housing based on any of these Scenarios would require the incorporation of adequate buffer zones (i.e. zones left undeveloped or containing less damaging forms of non-residential development) around the SSSI, and there is no information indicating whether such buffers would have an impact upon the housing numbers anticipated for these neighbouring sites and whether it would impact on either the deliverability of these sites or have an impact on the overall housing numbers.

#### **4. Section 4: Housing**

Our comments on the delivery of housing need in Medway are incorporated into our section 3 comments above.

The RSPB has noticed a slight variance between the text in paragraph 4.43 on houseboats and the wording of policy H7: Houseboats. Paragraph 4.43 includes the wording:

*"Medway's river and estuary are designated for their environmental importance. Opportunities to upgrade facilities and amenities will be supported where there will be no adverse environmental impacts. Particular regard needs to be given to the health of the designated marine and supporting habitats of the estuaries and river."*

However, we can identify nothing in the policy wording beyond the phrases *"in order to minimise impact"* (2<sup>nd</sup> bullet point) and *"to deliver improvements that benefit the local amenity and environment"* (final bullet point) which could reflect this text. In particular there is no reference to *"upgrading facilities and amenities"*, nor is there a clear reference to the health of the environment. We recommend that an additional bullet point is added to the following effect:

- Potential developments will only be supported where there are no adverse environmental impacts upon the health of the designated marine and supporting habitats of the estuaries and rivers.

#### **5. Section 5: Employment**

The RSPB does not have a strong view on the allocation of new employment development, subject to any such developments respecting environmental sensitivities, in particular the network of nature conservation

designations within the Council's boundaries. In this respect we support the conclusions of the HA set out in paragraph 6.2.1.3 (page 50). We note also that the HRA, in paragraph 7.2.3 Mitigation Measures (page 42) refers to the boundary of the Medway Commercial Park requiring revision to prevent encroachment onto the Medway Estuary and Marshes SPA/Ramsar site, which we strongly support (we assume that this apparent encroachment is the result of a mapping error).

## **6. Section 6: Retail and Town Centres**

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

## **7. Section 7: Natural Environment and Green Belt**

The RSPB **supports** the overall approach taken in this section to the protection of the natural heritage of Medway. In particular, we welcome the recognition in paragraph 7.3 of the national and international wildlife designations that apply to about one third of the land area of Medway.

We note the references in paragraphs 7.10 and 7.11 to the potential tensions between increased coastal access and disturbance to the interest features of the three SPAs and Ramsar sites, notably over-wintering and breeding bird species. The RSPB is actively involved in implementing the Strategic Access Management and Monitoring Scheme (SAMMS) for the Thames, Medway and Swale (being a member of both the Steering Group and the Project Board) and we strongly support the Council's intention, set out in paragraph 7.12, to include a policy relating to SAMMS in the new Local Plan.

We **support** the approaches set out in boxes NE 1 (Sites of international importance for nature conservation), NE 2 (Conservation and Enhancement of the Natural Environment) and NE 5 (Securing strong Green Infrastructure). We look forward to continuing to work closely with the Council on delivering the benefits deriving from a robust and extensive network of "green" spaces, including the RSPB's own landholdings at and adjoining Northward Hill and Cliffe Pools.

In our response to Scenario 4 we have highlighted several statements within the draft Plan that reflect government policy towards protecting SSSIs and have highlighted that we consider that the proposal to allow development that would damage the Chattenden Woods and Lodge Hill SSSI would not be appropriate. We consider that the inclusion of this scenario marks a clear contradiction with the policy statements regarding the natural environment set out elsewhere in the draft Plan, and in particular the statements made in this section.

## **8. Section 8: Built Environment; Section 9: Health and Communities; Section 10: Infrastructure**

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

## **9. Section 11: Transport**

The RSPB is committed to the aims of sustainable development, and it is critical that major new development is supported by realistic transport infrastructure, with a focus on air quality and green transport options.

While we recognise that, as the Council says, *"planning policies must relate to the development and use of land, while other strategies, including the Local Transport Plan, will directly deliver improvements to transport"*, the Council's proposals do include what appears to be a doubling of the housing on the Hoo

Peninsula, accessed by one major road that is already a congestion hotspot and Air Quality Management Area (AQMA).

In Section 11.6, the Council says that *"The council has commissioned a Strategic Transport Assessment (STA) as a key component of the evidence base. It is used to assess the existing situation and determine the transport implications of potential site allocations, providing an understanding of the cumulative and site specific impacts in terms of the capacity of the road network and the associated safety issues. The STA will inform strategic and specific mitigation requirements for sites allocated for development in the Local Plan."*

As **Policy T1: Promoting sustainable transport** says, *"The council will work with the relevant authorities and transport providers to...ensure development is located and designed to enable sustainable transport"*.

As it stands, it is impossible as a consultee to tell whether the development allocations being proposed are indeed located in places that enable sustainable transport systems, and whether the infrastructure required will actually pose further impacts on the SSSI and SPA protected sites network. For example, the Lodge Hill masterplan appears to have just one dead-end road leading to the major new development. We question whether this is sustainable, or whether added transport infrastructure is required, in which case the implications for the SSSI are even more severe.

In order to present scenarios that set out spatial options we would have expected to see some technical work which would have identified what transport infrastructure needs these scenarios might have and the likelihood that they could be funded and delivered in a sufficiently timely manner to enable key housing sites to be delivered. We have not seen such a document, and as we have highlighted, we are aware of at least one area where a potential transport bottleneck exists. There are also associated issues around air pollution – we have noted above that there is already an AQMA on the Hoo Peninsula, and its potential implications for future increases in housing numbers and hence vehicle traffic and attendant air pollution needs to be taken into account. Without a clear evaluation of the transport infrastructure needs and potential air pollution constraints at this stage we consider that the deliverability, and hence the soundness, of the options as they stand must be in question.

## **10. Section 12: Minerals, Waste and Energy**

The RSPB has no comments on this section.

## **11. Sustainability Appraisal**

The latest iteration of the Sustainability Appraisal (SA) was published on 27 April 2018 and provides a useful overview of the implications of the proposed Development Strategy against a wide range of objectives. It rightly points out in paragraph 1.2.1.1 that *"Local Plans should not propose policy that contradicts legislation, and they should seek to fulfil obligations set out in policy which sits above local plans (i.e. national policy guidelines and priorities)." A key example of the latter is the NPPF.*

We have significant concerns about how the various objectives have been evaluated within the SA. The assessment of Scenario 4 (pages 36-37) concludes that the implications for Objective 6 are 'minor negative', a conclusion which we strongly refute, as the direct loss of a substantial area of SSSI that would result from this Scenario we would contend can only be a 'significant negative'. The suggestion that *"This could be improved through an approach which commits to a comprehensive monitoring strategy that would identify adverse impacts in a timely manner, to allow further remediation or mitigation to take place"* is fundamentally flawed. Where the destruction of a large part of a SSSI is concerned, no monitoring strategy,

however comprehensive, is capable of reversing the adverse impacts that this would have on the site and its interest features.

Our concerns relate in particular to Objective 6, set out in the SA, *“to protect and enhance biodiversity features.”* This Objective has a set of nine ‘Guideline Questions’ against which to assess this Objective. However, no guidance appears to be provided on how, if at all, these individual Guideline Questions are weighted, and looking at the way that various elements of the plan have been evaluated forces us to conclude that there has been little, if any, weighting of the answers to reflect their comparative importance in both law and national planning policy: in essence each consideration is treated as being equally important by the SA – which leads to incorrect conclusions. For example, Question 1 is *“Will it protect and enhance international, national and locally designated wildlife sites including Natura 2000 sites and SSSIs, including avoiding indirect impacts?”* Does this have equal weighting with Question 8, *“Will it result in greater community engagement with biodiversity?”* The latter is a highly laudable aim, which the RSPB fully supports, but the consequences of failing to achieve community engagement with biodiversity are incomparably lower than of failing to achieve the protection of a statutory protected site. If the answer to Question 1 is ‘no’ but the answer to the other eight questions is ‘yes’, does that result in a positive assessment? The RSPB consider that there is no legal or policy justification which would support these two issues being given identical weight. Indeed, we consider that doing so is contrary to Medway’s own SA.

A key element of the SA, and one which we consider has not been properly taken into account is Table 2: *The assessment criteria used to assess the local plan against the sustainability objectives.* We quote the text from the **Significant negative** entry:

*“Likely to affect the whole, or large areas of Medway and neighbouring areas. Also applies to effects on nationally significant or internationally important assets. The effects are likely to be direct, irreversible and permanent and/or affecting areas or assets with high sensitivity to change. The magnitude of the predicted effects will also be major.”*

We consider that Sites of Special Scientific Interest would logically and inescapably fall within the definition of “nationally significant”.

The entry in Table 2 for **Minor negative** reads:

*“Minor negative effects are likely to be limited to small areas within Medway, or limited to small groups of people and receptors and or those with low sensitivity to change. The effects can be direct or indirect, temporary or reversible. The importance of the receptor is likely to be minor as is the magnitude of the predicted effect.”*

Given the potential significance of the SA conclusions to the Council’s views on (amongst other things) the appropriateness of development within the Chattenden Woods and Lodge Hill SSSI, we would be grateful for an explanation of the approach to balancing these Guideline Questions. In addition, we would like a clear explanation as to why combining the results of all of the questions has enabled an impact that qualifies, under the Council’s own criteria set out above, as a significant negative one to be combined with others and downplayed so that the overall impact is identified as a minor negative one – a conclusion that entirely fails to reflect a key finding which should have been reached within the SA. We would strongly make the case that, if a Natura 2000 site or SSSI is not protected and enhanced, including taking account of indirect impacts, then no matter what other positives are achieved in the Plan, the only conclusion possible is of significant negative impact. We consider that this is the only possible approach that would properly reflect the steer set out in paragraphs 117 and 118 of the National Planning Policy Framework.



Overall, we were disappointed that the Council was not able to answer a number of our questions in our letter of 11 May 2018, which we felt were essential to understanding the Sustainability Appraisal, namely:

- the process the Sustainability Appraisal followed to reach its conclusions
- the area of SSSI that would be allocated for development
- the area of land proposed for allocation for development within 400 metres of the SSSI boundary.
- the lack of reference to ‘buffers’ in Scenarios 2, 3 and 4 with regard to SSSIs

The RSPB raised these concerns so shortly after the SA was published because we hoped to give the Council the opportunity to answer them and for us to reflect those answers in our response to this consultation. If the Council had done so it is possible a number of the points that we have raised above could have been dealt with satisfactorily. We urge the Council to ensure that, insofar as they are pertinent to the Regulation 19 consultation, these questions are answered in the supporting documentation that accompanies these responses.

## 12. The Soundness of the Plan

Despite the changes made in the current version, the RSPB continues to have serious concerns about the soundness of the emerging plan. In our response to the 2017 Regulation 18 consultation we considered the soundness of the plan, viewed through the lens of paragraph 182 of the NPPF. We consider that it would be helpful to repeat that exercise to reflect the changes that Medway Council have made to the draft plan in the intervening year.

For ease of reference we set out paragraph 182 below:

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

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

The RSPB is concerned that despite the changes since the 2017 version the current plan fails to comply with a number of these requirements.

**i. Legal and procedural requirements:** As set out above we are profoundly concerned that there have yet again been significant deficiencies in the consultation on the plan: given the problems the Council experienced in supplying supporting documentation for the consultation in 2017 we find it hard to comprehend how the Council can have found itself in a similar situation over the production of the Sustainability Appraisal in 2018. We consider that the Council needs to consider carefully whether the Inspector at the future examination of the Plan could decide that this consultation has been procedurally

deficient. Such deficiencies cannot be rectified at the examination stage, and as with a failure to comply with the Duty to Cooperate, the Inspector would have no option but to reject the Plan. We are keen to ensure that the Council avoids this outcome.

**ii. Positively prepared:** The RSPB notes the reliance on the Lodge Hill site to deliver housing in Scenario 4, despite the clear statements from the Core Strategy Inspector that it should not be relied upon. We note that this approach is being undertaken by the Council in the clear knowledge that it runs counter to national policy. We question how a document which takes such an approach can be considered to be positively prepared.

**iii. Justified:** The RSPB has highlighted, as we did at the previous Core Strategy examination, that based on the Council's own figures Lodge Hill is not required to meet the Council's housing needs. The RSPB notes in particular that Scenario 3 is capable of delivering 7,193 more dwellings than scenarios 1 and 2 – both of which exclude Lodge Hill. Consequently Scenario 4 could easily dispense with the Lodge Hill allocation. The RSPB considers that the Council has not presented any evidence that the sites it has presented within the options are not available or suitable. Consequently, a strategy that will lead to the destruction of a significant proportion of a SSSI when other options are available cannot be considered to be the most appropriate.

**iv. Effective:** There are clear uncertainties over the delivery of housing at the Lodge Hill site, due to its inconsistency with national planning policy. We return to this point in the next paragraph. We consider that relying upon an allocation which national policy says should not be developed due to its protected status is likely to end up with any development proposal being called in by the Secretary of State if the Council were minded to approve it: this is the antithesis of a Plan that is deliverable over its period.

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

It is also important to consider the extent to which the Plan that the Council is preparing is sustainable, as that reflects a number of key policy stipulations within the NPPF. The Ministerial foreword to the NPPF states:

*“The purpose of planning is to help achieve sustainable development.*

*Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations.”*

It continues *“Sustainable development is about change for the better ...”. “Our natural environment is essential to our wellbeing ... opened to people to experience it, to the benefit of body and soul.”* The RSPB consider that the survival of Lodge Hill and its nightingale population represents a key test for Medway Council. The loss of Lodge Hill would prejudice future generations and their ability to enjoy the song of this rare bird.

The NPPF makes it clear that *“to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.”* (NPPF, paragraph 8). The RSPB

considers that this means that any potential trade-offs, in particular harm to protected sites with the promise of measures elsewhere, are not likely to deliver on this expectation.

*“Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment ...”* (NPPF, paragraph 9). The RSPB does not consider that proposals to build housing at Lodge Hill will achieve such positive improvements.

Paragraph 14 (and footnote 9) of the NPPF makes it clear that sustainable development requires that development should be restricted for sites that are designated as SSSIs. Inclusion of a scenario within the plan that includes development within the SSSI is highly unlikely to accord with this provision, and we consider that the Council has failed to advance evidence which would justify such development.

*“Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.”* (NPPF, paragraph 151) The RSPB considers that allocation of Lodge Hill would not meet this requirement.

*“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. **Significant adverse impacts on any of these dimensions should be avoided, and wherever possible, alternative options which reduce or eliminate such impacts should be pursued.** Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible compensatory measures may be appropriate.”* (NPPF, paragraph 152) (emphasis added) As we have highlighted above, the information provided in Scenarios 1 to 3 makes it clear that Lodge Hill is not required to deliver the Council’s objectively assessed housing need. Consequently it would be appropriate to avoid harm to this SSSI by dropping Scenario 4.

*“In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.”* (NPPF, paragraph 197) The logical and inevitable implication of this statement, given the consideration above, is that Medway Council would be expected to refuse any planning application which threatened to harm the Chattenden Woods and Lodge Hill SSSI. So any allocation at Lodge Hill is extremely unlikely to be deliverable. Consequently we recommend that the Council does not consider Scenario 4 any further and focuses its efforts on meeting its housing numbers away from Lodge Hill.

### 13. Conclusions

- The RSPB **strongly supports** the Vision that, *“by 2035 Medway, will be noted for its stunning natural assets and countryside”*.
- The RSPB **welcomes** the approach taken in the HRA with regard to Special Protection Areas.
- The RSPB is **concerned** about the presentation of four scenarios that vary in whether they are to achieve the OAN or the Standard Methodology.
- The RSPB is **pleased** that, in contrast to the 2017 consultation on the Development Options, Medway Council has included three Scenarios (1–3) for allocation of land for development that do not include direct land take from the Chattenden Woods and Lodge Hill SSSI.
- However, one of the four Scenarios entails direct land take from a SSSI, which is contrary to the Council's own stated methodology for screening sites, and whose 'Significant Negative' impact is

not recognised appropriately in the SA, is contrary to the NPPF and its obligations to biodiversity, and would lead to a devastating impact on the nation's best site for the red-listed nightingale.

- Also, **all** the Scenarios presented would involve significant development (we understand this to be in the order of 3000 houses in or adjacent to Lodge Hill as well as further housing at Deangate, although in the absence of a revised SLAA this is not possible to verify) in close proximity to the boundary of the SSSI. These, too, would have consequent serious adverse impacts on the interest features of the site, notably breeding nightingales, and this needs to be recognised and the Avoid-Mitigate-Compensate hierarchy followed accordingly.

We therefore consider that **all** the Scenarios as currently presented **cannot be justified** within the Avoid/Mitigate/Compensate hierarchy as required under NPPF.

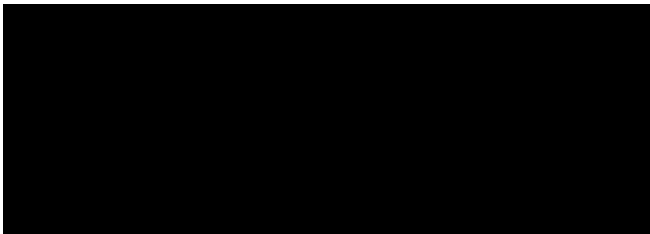
We recommend that Scenario 4 is withdrawn from the draft Local Plan, as it has been shown that there is an alternative (i.e. it can be avoided).

We also consider that the other three Scenarios would require a land buffer between the SSSI and development land, the precise size of which to be determined by adopting expert advice, and we would very much welcome being part of that discussion.

We continue to have **deep reservations** about the sustainability of the Plan as it currently stands in the absence of clearer information, in particular with regard to transport.

The RSPB looks forward to continuing to work with the Council towards the adoption of a sound Local Plan, and to help achieve a sustainable vision for Medway.

Yours sincerely



Steve Gilbert

Senior Conservation Officer

Email:



## Appendix 1: Letter from RSPB to Medway Council dated 5 April 2018



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

By Email only: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) ; [catherine.smith@medway.gov.uk](mailto:catherine.smith@medway.gov.uk)

Dear Ms Smith

05 April 2018

### **Request for clarification on the publication of the Sustainability Appraisal and an extension to the consultation period with respect to Medway Local Plan Development Strategy consultation**

---

Further to our telephone conversation on 3 April, I note that the Sustainability Appraisal to support the draft Medway Local Plan Development Strategy is still not available, despite the fact that the consultation on the draft Strategy has now been open for almost three weeks. I would be very grateful if we could receive clarification about when this important document will be published. We are unable to formulate an informed response to the consultation in its absence.

Whilst in principle we would have preferred the consultation to run to its originally proposed timetable, we feel that an extension is the only appropriate course of action for the benefit of everyone taking part, as currently no one has all the information in front of them to make properly formulated representations.

Accordingly, we request an extension to the consultation period, such that it closes six weeks after publication of the Sustainability Appraisal.

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

Kind regards

Steve Gilbert  
Senior Conservation Officer  
Email: [REDACTED]

#### **South East England Regional Office**

1st Floor, Pavilion View  
19 New Road  
Brighton  
BN1 1UF

[REDACTED]  
[REDACTED]  
[rspb.org.uk](http://rspb.org.uk)

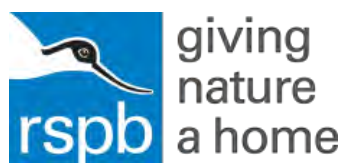


The RSPB is part of BirdLife International,  
a partnership of conservation organisations  
working to give nature a home around the world.

**Patron:** Her Majesty the Queen **Chairman of Council:** Kevin Cox **President:** Miranda Krestovnikoff  
**Chief Executive:** Dr Mike Clarke **Regional Director:** Nic Scothern

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

## Appendix 2: Letter from RSPB to Medway Council dated 16 April 2018



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

By Email only: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) ; [catherine.smith@medway.gov.uk](mailto:catherine.smith@medway.gov.uk)

Dear Ms Smith

16 April 2018

### **Request for clarification on the publication of the Sustainability Appraisal and an extension to the consultation period with respect to Medway Local Plan Development Strategy consultation**

---

With regard to my letter of 5 April and your interim reply the following day, I note that the Sustainability Appraisal has still not been published. As you will appreciate, we (along with other interested parties) are unable to formulate meaningful representations in the absence of this key document.

The consultation states (Section 1, paragraph 1.21) that the "Development Options consultation document is **informed** by a... Sustainability Appraisal" (emphasis added) but it is difficult to understand how this can be the case when the Sustainability Appraisal is still not available some four weeks after publication of the Development Strategy.

I would appreciate an update and confirmation that the consultation period will be extended to run for six weeks from the date of publication of the Sustainability Appraisal.

Kind regards

Steve Gilbert  
Senior Conservation Officer  
Email [REDACTED]

#### South East England Regional Office

1st Floor, Pavilion View  
19 New Road  
Brighton  
BN1 1UF

[REDACTED]  
[REDACTED]  
[rspb.org.uk](http://rspb.org.uk)



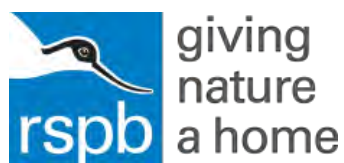
The RSPB is part of BirdLife International,  
a partnership of conservation organisations  
working to give nature a home around the world.

**Patron:** Her Majesty the Queen **Chairman of Council:** Kevin Cox **President:** Miranda Krestovnikoff  
**Chief Executive:** Dr Mike Clarke **Regional Director:** Nic Scothern

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654



## Appendix 3: Letter from RSPB to Medway Council dated 11 May 2018



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

By Email only: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk) ; [catherine.smith@medway.gov.uk](mailto:catherine.smith@medway.gov.uk)

Dear Ms Smith

11 May 2018

### Consultation on the Medway Council Local Plan Development Strategy 2012 – 2035

---

Thank you for confirming the extension to the consultation period on the Medway Council Local Plan Development Strategy, following the publication of the latest iteration of the Sustainability Appraisal (SA).

The RSPB will submit a full response prior to the close of the consultation on 25 June.

However, on an initial reading of the SA we feel that important information is lacking in a number of areas, making it very difficult to formulate considered comments. I thought it would be helpful if I raise these points now, in the hope that you may be able to provide clarification before we finalise our response to the consultation as a whole, and ideally ahead of the proposed meeting with conservation organisations.

1. Scenario 4 includes significant direct land take from the Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI), which is by definition a nationally important wildlife site. This would represent probably the largest direct loss of SSSI to development in the UK for at least 20 years. We find it inconceivable that this could be assessed as anything other than a 'double negative' **Major Impact** on a nationally important site. Yet this is not the conclusion reached in the SA. In order for us to consider this adequately, could you please share the details of the process followed by Arup that led them to their conclusion? In particular, what area of the SSSI would be allocated for development under this Scenario? This information is particularly important in understanding the reasoning behind Arup's conclusions in relation to this site.

#### South East England Regional Office

1st Floor, Pavilion View  
19 New Road  
Brighton  
BN1 1UF

[rspb.org.uk](http://rspb.org.uk)



The RSPB is part of BirdLife International,  
a partnership of conservation organisations  
working to give nature a home around the world.

**Patron:** Her Majesty the Queen **Chairman of Council:** Kevin Cox **President:** Miranda Krestovnikoff  
**Chief Executive:** Dr Mike Clarke **Regional Director:** Nic Scothern

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

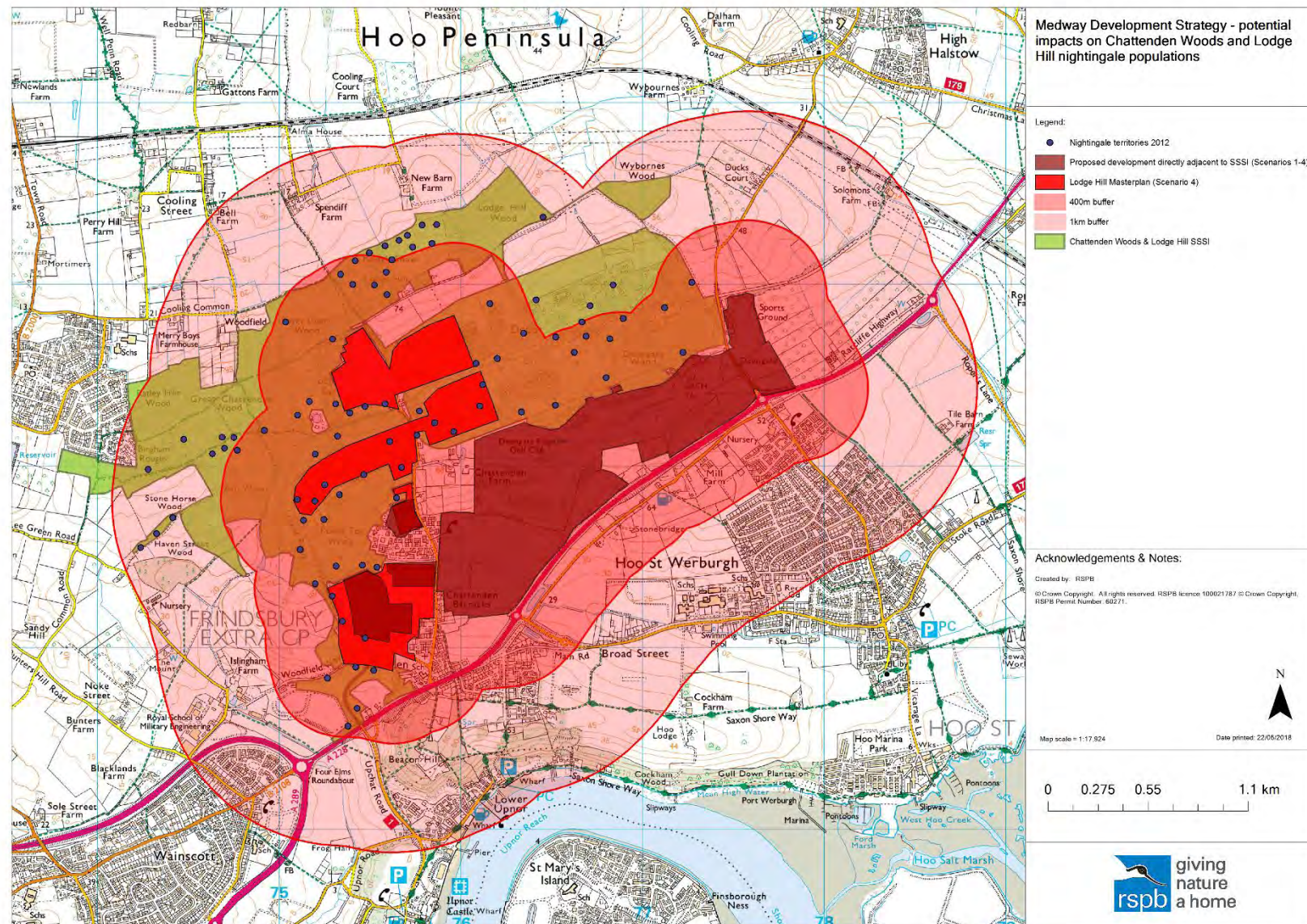
2. All four Scenarios would allocate extensive areas of land for development within 400 metres of the SSSI boundary, with significant development directly adjacent to the SSSI. The urban effects of such development, such as light, noise, disturbance and incursion by cats, are well understood and documented and are likely to have serious negative impacts on breeding nightingales, an interest feature of the SSSI, and the reason why the SSSI was extended to cover most of the Lodge hill site. One would accordingly have expected this to be assessed as a 'double negative' **Major Impact** on a nationally important site. However, the SA does not come to this conclusion and indeed Scenario 1 is assessed as having 'neutral effect'. On the information available to us we are unable to understand how this conclusion was reached. It would be helpful to have the details of the process followed by Arup that led them to this conclusion including confirmation of the amount of land proposed for allocation for development within 400 metres of the SSSI boundary.
3. The Development Strategy refers, in Scenario 1, to the inclusion of 'buffers to protected land'. Does this apply to the Chattenden Woods and Lodge Hill SSSI, and if so what form might such 'buffers' take? Will they cover the whole of the SSSI or only parts of it? Why is there no reference to 'buffers' in any of the other Scenarios, although Scenarios 2 and 3 also exclude development on the SSSI?
4. The Development Strategy states, with reference to the SSSI, that 'the new proposal is significantly reduced in scale from the withdrawn outline planning application, **reflecting a new strategy for nature conservation on the site**' (emphasis added). Could you possibly share that strategy with us? In the absence of an understanding of the scope of such a strategy, it is difficult to make a meaningful response, particularly as this strategy still involves a significant land take from the SSSI.

I hope that it is useful to raise these interim points at this stage, and hope that you will be able to provide us with the further information requested above to allow us to make a fully informed response to the Development strategy consultation.

Kind regards

Steve Gilbert  
Senior Conservation Officer  
Email [REDACTED]

## Appendix 4: Map illustrating the potential impacts of the Medway Development Strategy on Chattenden Woods and Lodge Hill SSSI Nightingale Populations





## **Medway Council Local Plan 2012 – 2035**

### **Development Strategy Regulation 18 Consultation Report**

#### **Representation on Behalf of Location 3 Properties Ltd**

##### **Introduction**

On behalf of our client, Location 3 Properties Limited, we are instructed to submit the following representations in respect of the above consultation draft of your emerging Local Plan. Our client has an interest in land at Plot 1, Anthony's Way, Medway City Estate which is subject of a current planning application with your authority. In addition, the same site is also subject to an appeal (ref. APP/A2280/W/18/3196850) which is scheduled to be heard at a Public Inquiry commencing in November 2018.

We set out our representations by reference to the questions raised in your consultation document.

##### **Policy RTC1: Retail Hierarchy**

###### ***Question RTC1 – Do you consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway?***

As an overarching comment, we are concerned that Policy RTC1 as currently drafted is overly wordy and lacks clarity and precision. Whilst we do not object to the fundamental principle of the policy which identifies Chatham as Medway's principal shopping centre followed by the other centres of Strood, Gillingham, Rainham, Rochester and Hempstead Valley we consider that, as currently drafted, the policy includes narrative that would be better placed within the supporting explanatory and therein the policy made more explicit and precise in what it seeks to achieve. The policy, as drafted, also mixes the use of the terms 'the Council' and 'the authority'. One or other should be adopted and used consistently to assist understanding and clarity.

The sentence defining the role of Local Centres is grammatically poor and therein difficult to understand. The following commentary on the potential for new centres is not an actual sentence and therein is again difficult to understand. Throughout Policy RTC1, the drafting should be simplified into clear easily understood sentences.

As a more specific point, we would question why proposals that fall within one of the defined centres, and are of an appropriate scale to that centre, require, under the final paragraph of the policy '*robust justification taking into account the existing provision, character and scale of the area and demographics*'. There should not be a requirement to provide '*robust justification*' for in-centre proposals that, in essence, are wholly consistent with the strategy and indeed the NPPF.

###### ***Question RTC2 – Do you agree with the definition of Chatham as the primary centre at the top of the hierarchy?***

Yes we agree that Chatham should appear at the top of the hierarchy but, as detailed below, we would question the designation of the next tier of centres as district centres.

### ***Question RTC3 – Do you agree with the identified district centres?***

Whilst we would agree that Strood, Gillingham, Rainham, Rochester and Hempstead Valley comprise the next level of centre in the retail hierarchy as compared to Chatham, we would suggest that they are better designated as 'other town centres' with Chatham defined as the 'primary town centre'. This reflects the reality of the situation on the ground and the role each perform, save, perhaps Hempstead Valley. Definition as 'other town centres' would also accord with the public's commonly held view of these centres. They are known and referred to as town centres rather than district centres.

## **Policy RTC2: Sequential Assessment**

### ***Question RTC6 – Do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?***

Whilst we support, in principle, the sequential approach, as enshrined in the NPPF, we consider Policy RTC2 introduces an unnecessary and unacceptable hierarchy between the defined centres of Chatham, Strood, Gillingham, Rainham, Rochester and Hempstead Valley. Consequently, as drafted a proposal for a town centre site in, for example, Gillingham, which was to serve the needs of Gillingham, could be said to fail the sequential test of RTC2 if there were another available site with Chatham Town Centre. Similarly, there is no justification to set Hempstead Valley at a lower position in the sequential test, as RTC2 currently does, than Strood, Gillingham, Rainham and Rochester. The NPPF (paragraph 24) does not require or support a ranking of centres when applying the sequential test. Its requirement is that the sequential test should be applied to proposals that are not within a defined centre.

On the detailed wording of RTC2's sequential test (second paragraph) the wording '*and where not in accordance with any part of the retail and main town centres uses strategy*' goes beyond the advice of the NPPF. The policy should simply adopt the NPPF's wording from paragraph 24 namely; '*not in accordance with an up-to-date Local Plan*'.

Although beyond our client's direct concern, the policy's comments in respect of large-scale leisure proposals and the requirement that they be accessible by sustainable means and not have a negative impact on traffic goes beyond anything required in the NPPF.

Equally, we do not support the narrative in the policy that deals with ancillary development. It is again overly prescriptive, not consistent with the NPPF and, in our opinion, is inappropriate for inclusion within the policy itself. If any such narrative is to be included, and we would question whether it is justified, it would be better placed within the explanatory text.

## **Policy RTC3: Impact Assessments**

### ***Question RTC7 – Do you consider the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres?***

No, we object to the policy. In the absence of a clearly supported and justified lower threshold the policy approach for the requirement of impact assessments should only be for proposals involving 2,500m<sup>2</sup> or more

retail floorspace. If the Local Plan is going to seek a lower threshold, which it may under the NPPF, it should specify and justify that threshold at this juncture so that it can be tested through the plan making process.

The requirements of criterion (b) go well beyond what is required by the NPPF. The first and last bullet points should be omitted to bring the policy in line with the NPPF's guidance. Impact on a development plan strategy is not part of the retail impact test of the NPPF (paragraph 26) and could be used to frustrate retail proposals that are otherwise compliant with the NPPF. Equally, the NPPF does not require, in impact terms, a consideration of the cumulative impact of a proposal and this has been confirmed by the Secretary of State in recent appeal decisions (for example, Scotch Corner).

The final bullet of criterion (b) should be omitted as it is vague and meaningless and does not provide an objective test against which a proposal might be judged.

## **Policy RTC12: Retail Park**

### ***Question RTC29 – Do you consider that this policy is an effective approach to planning for retail parks?***

No. First, the policy as drafted only allows for retail warehouse development within the existing retail parks. It provides no policy basis for the assessment of new retail warehouse development beyond the established retail parks. The policy should be omitted in its entirety and replaced with an appropriate policy dealing with out-of-centre development which reflects the policy requirements of the NPPF.

Notwithstanding this, as currently drafted, the criteria to Policy RTC12 go well beyond anything required in the NPPF. For example, in bullet point 3 the impact test suggests that a proposal should have 'no impact' on a defined centre. The NPPF's test, the appropriate test, is one of significant adverse impact. Inevitably, an out-of-centre proposal will have some impact on an existing centre or centres. On the policy's current drafting that would be sufficient to justify refusal of consent notwithstanding the proposal might deliver significant other benefits including extending customer choice, rebalancing shopping provision and job creation. If an impact test is to form part of any redrafted policy, it should be the NPPF's test of 'significant adverse impact'.

Similarly, the third criterion 'no significant impact on the transport network and parking' goes beyond the NPPF's requirements. It is not one of the NPPF's tests against which out-of-centre retail proposals should be judged. Likewise a requirement for good public realm and linkages is unnecessary and goes beyond national policy requirements.

The policy is, as we say, wholly unacceptable in its current drafting and should be redrafted afresh to reflect the NPPF's guidance.





## **Medway Council Local Plan 2012 – 2035**

### **Development Strategy Regulation 18 Consultation Report**

#### **Representation on Behalf of Location 3 Properties Ltd**

##### **Introduction**

On behalf of our client, Location 3 Properties Limited, we are instructed to submit the following representations in respect of the above consultation draft of your emerging Local Plan. Our client has an interest in land at Plot 1, Anthony's Way, Medway City Estate which is subject of a current planning application with your authority. In addition, the same site is also subject to an appeal (ref. APP/A2280/W/18/3196850) which is scheduled to be heard at a Public Inquiry commencing in November 2018.

We set out our representations by reference to the questions raised in your consultation document.

##### **Policy T1: Promoting Sustainable Transport**

###### **Question T1 – Do you agree that this approach offers an appropriate strategic approach to transport planning in Medway?**

We do not object to Policy T1 but do note that it at paragraph 11.83 commits the Council to exploring the need for and, if required, the location of park and ride facilities in Medway. Any such work in that regard should be set in the context of the failure to secure a park and ride facility across Medway notwithstanding that the existing local plan's long held commitment to deliver a park and ride including the allocation of a site under existing Policy T17. The existing allocated site under Policy T17 has benefitted from several planning consents for a park and ride facility over many years, however, all have failed to come to fruition. Moreover, the only other park and ride facility within Medway (Horsted) was closed and subsequently sold by the Council. None of this suggests a park and ride facility is realistic or deliverable.