

From: [REDACTED]
Sent: 25 June 2018 11:03
To: futuremedway
Cc: [REDACTED]
Subject: Future Medway Local Plan - Development Strategy Consultation Response

Categories: Blue Category

Dear Sir/Madam,

On behalf of our client Sainsbury's Supermarkets Limited, please find a series of responses below, made to questions posed within the Development Strategy Document.

Response to Question RTC6:

The current wording of this policy is not consistent with NPPF because it specifies a sequence for consideration of sequential test. This is not appropriate because it could jeopardise development (for example of the edge of one of the lower order centres) simply because a sequentially preferable site is available in a higher order centre. The reference to the 'sequence' of town centres is unnecessary and adds a layer of complexity to the sequential assessment that is not advocated by NPPF.

Response to Question RTC8:

No, we do not agree with policy RTC3 because it is inconsistent with NPPF. The first bullet point of RTC3 b) should be removed because the reference to 'Impact on the strategy' is not an appropriate test, and the policy is not consistent with national planning policy. The correct application of the impact test, in conjunction with the sequential test, will naturally protect the 'strategy'.

Response to Question RTC9:

We suggest that the nationally recognised threshold for retail impact assessments would be appropriate – 2,500sqm. Applying a lower threshold places an unnecessary burden on the planning system. The centres in Medway are of a sufficient size such that they would be likely to be able to absorb the impacts from developments below 2,500sqm, particularly as it will be spread around a wide, and expanding catchment population.

Response to Question RTC11:

The Strood Retail Park should be included within the district centre boundary for Strood as it functions as an integral part of the town's retail offer. The boundary of Retail Designation 5b should be amended accordingly.

We look forward to receiving confirmation of receipt of these comments in due course but in the meantime, should you require any further information, please let us know.

Kind Regards,

John Shakespear
Town Planner

WYG

90 Victoria Street, Bristol, BS1 6DP

Tel: [REDACTED]

www.wyg.com

WYG Environment Planning Transport Limited. Registered in England number: 3050297.
Registered Office: Arndale Court, Otley Road, Headingley, Leeds, West Yorkshire LS6 2UJ. VAT No: 431-0326-08.



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One Chapel Place
London
W1G 0BG

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

██████████
██████████
Your ref:
Our ref:

By E-mail Only: futuremedway@medway.gov.uk

28 March 2018

Dear Sir or Madam,

MEDWAY LOCAL PLAN – DEVELOPMENT STRATEGY REGULATION 18 CONSULTATION

I am writing on behalf of our client National Grid and these representations are written in the context of their substantial landholding at the Isle of Grain. The site is owned by Thamesport Interchange Limited (TIL), which is wholly owned and managed by National Grid.

These representations follow our previous submissions to the Council at the Issues and Options stage in February 2016 and the Development Option stage in May 2017.

The existing Medway Local Plan (2003) shows that the site is allocated for employment purposes and part of the landholding has planning permission (MC/09/1628) for:

“the development for up to 464,685 sqm of built employment space for (Use Classes B1(c), B2 and B8 – including open storage), and up to 245 sqm of floorspace for a business park management centre (Class B1(a) and retail unit(s) (Classes A1, A3 and A5), with associated infrastructure, landscaping, car parking and access.”

In addition, the first phase reserved matters for this site (MC/15/1051) was approved in July 2015.

The site was previously an old oil refinery and this rich industrial heritage has been continued with a number of nationally significant energy users on the site. Two examples include Grain LNG, which has the ability to provide up to 20% of the UK's forecast gas demand and the BritNed interconnector, which operates the electricity link between the UK and the Netherlands.

Our representations below are made with the above context in mind and are set out in the same order as the issues raised in the Development Strategy document. It should be noted that our representations only address those issues considered relevant to National Grid and its interests at TIL site on the Isle of Grain.

Question E1

We are supportive of the approach being taken by the Council to secure and strengthen Medway's economy. Diversification in terms of the range of jobs on offer will help ensure employment for workers at all skill levels. Acknowledging the need to work together with stakeholders across business, industry and investment, the public sector, the education sector and others will help deliver a more joined up way of thinking about economic growth that is more responsive to business needs and wider economic challenges. This will need to be supported in the Local Plan through the careful management of land uses to ensure there is sufficient land available for employment uses in the right location for the type of employment proposed.

We note that Policy ED1 makes specific reference to securing sustainable employment uses for the strategic site at Grain to achieve value from its location offer and its access to water and rail. We are glad the Council acknowledges these unique traits but feel that specific reference should be made to its potential for developing further energy generation and storage facilities. National Grid's facilities, wharves and the LNG pipeline already make significant contributions to the national energy network and the Grain site can further support, expand and add new facilities to these leading to an energy hub of national strategic importance. This would enhance a sector that many local authorities will not have in their economic mix giving Medway a significant lead in the energy sector. We also believe that the site at Grain could complement other existing businesses on the wider Hoo Peninsula including the aggregates sector which would also benefit from the site's easy access to water and rail. There is also the opportunity to use the existing infrastructure at the TIL site including the jetties in order to make increased use of Medway's historic river port services thereby making them more viable and re-establishing the river as a key transport artery.

Question E2

The TIL site at Grain represents an appropriate location for employment growth. This is evidenced by the extant permission for 464,685 sqm of employment floorspace and it is important this land remains protected and designated for employment uses. However, any future allocation should recognise the site is suitable not only for spaces in the B1(c), B2 and B8 use classes but also for uses associated with the energy industry. There are numerous nationally significant energy providers on the site and there is huge potential for these providers to continue and expand on the site as well as the opportunity for new providers to come to the site. These energy uses come with a number of skilled jobs particularly in the engineering sector and would complement the Universities at Medway Engineering School and the Council's desire to boost the size of Medway's skilled workforce.

The existing adopted Medway Local Plan (2003) specifically identifies the site for a wide range of uses including B1(c), B2 and B8 uses, special industrial uses and industrial uses not in a use class. We believe that this broad range of uses should be retained in the new Local Plan, to maintain flexibility on this regionally and nationally significant site.

This flexibility will ensure that the site reaches its full development potential in terms of industry, energy provision, employment space and creation of jobs in the local area.

Question E3

Whilst we are supportive of the Council's goal of increasing Medway's GVA greater clarity needs to be provided on how planning applications for employment uses will be assessed for their GVA contributions and what weight this would have in determining such applications. Planning applications for employment uses can bring a range of benefits and employment opportunities which may not be accurately represented if there is a reliance on solely assessing GVA contributions.

We agree it is appropriate for the Council to use the Local Plan to designate specific employment sites as suitable for higher value employment and suggest it should be on these sites where planning applications

are assessed for their GVA contributions. Alternatively applications across Medway could have to exceed certain thresholds before their GVA contributions are assessed.

We believe there also needs to be discussion as to what site characteristics and locational offers the Council considers to be better suited for particular employment uses. Whilst this should not be a rigid list some further guidance would be helpful for prospective developers.

Question E4

We support the Council's approach for securing more high value jobs in Medway and these should indeed include elements such as making the most of regeneration in Medway and other major projects outside Medway, working with education providers and supporting opportunities to develop qualifications and skills and ensuring there is adequate infrastructure for the modern business environment such as high speed broadband.

Question MWE3

We agree that the proposed policies MWE11-MWE12 represent the most sustainable approach to planning for energy in Medway. Policy MWE11 is suitably supportive of new energy developments with acceptable reasoning for those scenarios where the Council would not be minded to grant planning permission.

We support the Council's acknowledgement, in paragraphs 12.30-12.35, of the significant role the energy sector has in Medway and are glad to see Medway's contribution to the sector will be a strategic priority for the new Local Plan. Future opportunities for the creation of new energy generation and storage facilities should be supported by the Council particularly at Grain where there is significant commercial interest in these facilities. As per our representations above with regards to Medway's economic development, new energy proposals can help support the Council's aim of increasing the number of highly skilled jobs and boosting opportunities for developing skills and training in areas such as engineering.

To further support the energy sector in Medway, we suggest that any specific allocation for the TIL site includes reference to the suitability of the site for energy uses alongside other employment uses.

We would also take this opportunity to promote the potential integration of energy uses on Hoo Peninsula. There are clear synergies between Grain LNG and other power generators such as the existing heat pipe which would result in the more efficient and environmentally friendly generation of power at reduced cost all of which would be beneficial to the wider South East region which is a major consumer of energy.

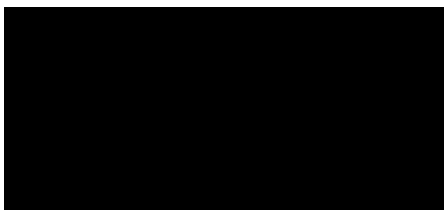
Conclusion

Overall, we are supportive of the approach being taken by the Council in preparing its new Local Plan. However, we continue to believe it is vital the Council recognises the strategic importance of the TIL site at the Isle of Grain in the new Local Plan. The potential for employment generating, energy related uses and links to existing port related activities are extremely important to Medway from a strategic perspective and these uses need to be protected and actively promoted in the new Local plan to ensure that these opportunities are fully exploited.

I trust you find the above comments to be helpful at this stage. However, please do not hesitate to contact me should you wish to discuss further.

In the meantime, I would be grateful if you could continue to keep me informed of progress of the Local Plan.

Yours faithfully



Alister Henderson
Partner



One Chapel Place
London
W1G 0BG

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

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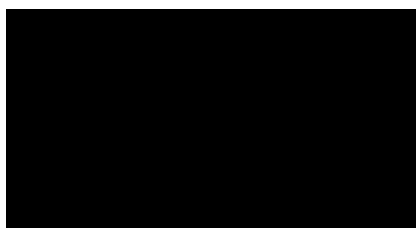
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In the meantime, I would be grateful if you could continue to keep me informed of progress of the Local Plan.

Yours faithfully



Alister Henderson
Partner







Rehman Chishti MP

Member of Parliament for Gillingham and Rainham

House of Commons
London SW1A 0AA

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

25 June 2018

Dear Sirs,

Re: Comments on Medway Council's Development Strategy

In March 2017, in my capacity as the Member of Parliament for Gillingham and Rainham, I submitted my views on Medway Council's Future Development Strategy Consultation, previously named the Local Plan.

I would like to once again submit representations on matters concerning Medway's Development Strategy. Further to my previous representations which are listed below, please see the additional points I would like to raise in bold.

Housing:

I fully understand the need to build more houses due to an ever increasing population, however Gillingham and Rainham Constituency already represents the most densely populated of the 5 principal towns which make up Medway Unitary Authority. I once again emphasise that where possible, development should take place on brownfield sites. In addition, all development should be conditional on appropriate supporting infrastructure (specific consideration needs to be given to the overcapacity of the A2 in Rainham taking into account existing and further developments proposed), whether that be transport, schools, health provision or any other local amenities. Once again, I urge the local authority to fully take into account the wishes of local residents when developing the strategy.

Having previously made strong representations to the Government, I was pleased to see that Medway has been shortlisted for £170 million from the Government's Housing Infrastructure Fund and I urge Medway Council to complement any additional housing with the necessary supporting infrastructure, stressing that where possible the key focus for housing development should be on brownfield sites.

Additionally, I understand that the Local Authority is conducting a review of parking zones in Gillingham and I ask that Medway Council does all it can to take into account the views of local residents to ensure the system is as fair as possible .



Medway Maritime Hospital and other health facilities:

I urge the local authority to fully take into account the wishes of the residents of Gillingham and Rainham Constituency, and develop the strategy in partnership with all other stakeholders to ensure that the hospital, acute services, along with primary care and community care is appropriate for the various needs of all local residents, again taking into account the ever increasing population. I pay tribute to the excellent work of the staff and the leadership at the hospital, as well as other health providers in the area, for the work they do to help local residents. The capacity for accident and emergency services at the hospital has benefitted considerably from the extra £18m invested in it, and the Hospital has also benefitted from the partnership with Guy's and St Thomas' Hospital. We need to ensure that the Hospital is always provided with the resources it needs to address capacity, as well as ensure the adequacy of transport links in and out of the hospital.

I previously made representations for a Hyper Acute Stroke Unit (HASU) and fully support the Local Authority's efforts for a HASU in Medway.

Faith Provision:

I urge Medway Council to take into account the views and representations of all faith groups who respond to the consultation across Gillingham and Rainham, to ensure that all residents have sufficient provision for a place of worship including vital supporting infrastructure such as parking and an appropriate level of burial space. This will ensure that our faith communities at the heart of our local community life, are able to go from strength to strength.

Having previously made representations to Medway Council and having engaged with faith communities across the community, it is my strongly held view that the various faith communities should have a provision of free parking at their area of worship for up to 4 hours on their specific day of worship.

Education:

In considering the education provision for Gillingham and Rainham at a nursery, primary and secondary level, I urge Medway Council to take into account the representations of residents who respond to the consultation, as well as the representations submitted by schools and other educational stakeholders. This will ensure that the additional provision serves the local community, taking into account an increased population in years to come by doing what some local schools have agreed to do and set an admissions criteria which gives preference to local residents, such as Rainham Mark Grammar School.

I also urge the Local Authority to work with our excellent local Further Education MidKent College, Universities and University Technical College, to ensure that they have the appropriate support they need to provide excellent education in their sector to local residents.

I understand that the EFA is looking at a new secondary school in Gillingham and Rainham constituency to cater for an increased number of students. Previously, a site had been identified in Hempstead for education purposes and I support the views of



Councillors in this area and in neighbouring wards that the new secondary school should be on the new Hempstead site.

Finally, I would ask the Local Authority to ensure that an adequate educational provision for all children with different educational needs are fully met, now and in in future when planning and addressing the educational needs of the local area.

Transport infrastructure:

With an ever-increasing local population, I strongly urge Medway Council to fully take into account the views and wishes of local residents in setting the transport strategy for the future, on key transport issues such as: road connectivity, the proposed Lower Thames Crossing, cycle lanes, parking facilities in the local area and an increased capacity on our trains and buses. Due to the overcapacity of the A2 through Rainham, consideration needs to be given to the extra pressure which will follow as a result of existing developments and the further developments proposed.

High Streets:

I urge Medway Council to fully take into account the views of local residents and shops in Gillingham and Rainham, in the regeneration strategy of our local high streets and shopping centres. As someone who has grown up and lived nearly all their life in Gillingham and Rainham, having used the local high street shops as a customer and hosted countless MP surgeries on the high streets, the regeneration of the high streets and shopping centres is often raised. Further to my previous representations on this matter to the Medway Council Executive, it is crucial that we do all we can to regenerate our local shopping centres across Gillingham and Rainham (Gillingham & Rainham High Streets, Parkwood Shopping Centre, Twydall Shopping Centre, Watling Shopping Centre and Hempstead Valley Shopping Centre).

I have previously made strong representations to the Local Authority on the need for the regeneration of our local high streets (such as Gillingham High Street) and I once again urge the Local Authority to address this on an urgent basis.

Green Spaces:

Out of the 5 principal towns that make up Medway Unitary Authority, Gillingham and Rainham has very little green space available, due to the dense population of the towns. I would therefore urge the Local Authority to fully take into account the wishes of local residents in protecting our local green spaces across the constituency.

Sports and Leisure:

The Local Development Strategy should take into account representations from residents, sports clubs and other stakeholders to ensure that the area continues to have excellent support and provision in the local area for sporting activity.

With regard to Gillingham Football Club, I understand that the Mill Hill site remains an ambition for the club as a location for significant dynamic development, which could see increased capacity as well as both residential and commercial development.



As the MP for Gillingham, it remains my view that Gillingham FC should remain in Gillingham, and I urge the Local Authority to consider this, also taking into account the views of local residents and other stakeholders.

Yours faithfully,

A solid black rectangular box used to redact the signature of the Member of Parliament.

Rehman Chishti MP,

Member of Parliament for Gillingham and Rainham

Declaration of interest re Gillingham FC: I am a proud fan and supporter of my local football team Gillingham FC, and have attended events and matches in my capacity as the MP for Gillingham and Rainham as declared in the register of interests in accordance with parliamentary rules.

REPRESENTATIONS TO MEDWAY COUNCIL
LOCAL PLAN
2012 – 2035

Development Strategy
Consultation Document

Submitted on Behalf Of
Redrow Homes (South East)

June 2018

**REPRESENTATIONS TO MEDWAY COUNCIL
LOCAL PLAN
2012 – 2035**

**DEVELOPMENT STRATEGY
CONSULTATION DOCUMENT**

**SUBMITTED ON BEHALF OF
REDROW HOMES (SOUTH EAST)**

June 2018

Project Ref:	23486/A5/HH
Status:	Final
Issue/Rev:	01
Date:	25 June 2018
Prepared by:	Hardeep Hunjan
Checked by:	Andrew Wilford
Authorised by:	Andrew Wilford

Barton Willmore LLP
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

Ref: 23486/A5/HH/kf
Date: 25 June 2018

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APPENDICES

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1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Redrow Homes (South East) in response to Medway Council's Local Plan 2012 – 2035 Development Strategy Consultation Document (MCDSCD) published in March 2018. As a landowner within Medway, Redrow Homes has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 1.2 These representations focus on promoting Redrow Homes' site known as 'The North Field, Halling' (The Site). A Site Location Plan is included at **Appendix 1**. The Site comprises an agricultural greenfield site approximately 6.84ha and is bound by residential development to the north, west and south. The A228 runs directly to the east of the site. The Site currently lies within the Green Belt.
- 1.3 The Site forms part of the wider St. Andrew's Park redevelopment which nearing completion by Redrow Homes (hybrid planning application reference: MC/12/1791) for 385 dwellings and associated mix of uses.
- 1.4 The Site is identified in the Medway SLAA 2014, 2015 and SLAA 2017 (site reference 352). A site-specific review and assessment of constraints was undertaken as part of the SLAA 2015. The SLAA 2017 concludes that the site is unsuitable for allocation principally due to its Green Belt status.
- 1.5 The Site itself is currently an unmanaged, sloping field with land rising from east to west, comprising a block of woodland in the southern corner adjoining the A228 and an area of scrub/woodland to the south-western corner adjoining Pilgrims Way/Road. A low voltage (33kv) overhead powerline crosses from west to east on the southern edge of the Site.
- 1.6 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework [NPPF] (March 2012) and National Planning Practice Guidance [NPPG] (March 2014). Additionally, reference has been made to the Draft Revised NPPF (March 2018) and Draft NPPG (March 2018) which recently underwent consultation and is expected to come into force Summer 2018.
- 1.7 The MCDSCD forms a third stage in the Local Plan's preparation (under Regulation 18 of the Local Plan Regulations). Representations were previously submitted to Medway Council's Local Plan Development Options Consultation (under Regulation 18) in March 2017 and the Council's Issues and Options Consultation in February 2016, copies of which are included at **Appendix 2**.

1.8 These representations focus on relevant matters relating to the release of the Site from the Green Belt for residential dwellings and address the following:

- Section 2 – National Planning Policy;
- Section 3 – Vision and Strategic Objectives;
- Section 4 – Delivering Sustainable Development – Options;
- Section 5 – North Field, Halling.

i) Previous Representations

1.9 Representations were submitted in March 2017 to the Local Plan Development Options Consultation (January 2017). A copy can be found at **Appendix 2**.

1.10 Representations were also submitted in February 2016 to the Local Plan Issues and Options Consultation (February 2016). A copy can be found in **Appendix 3**. Appendix 3 includes representations from Barton Willmore Research critique of the published SHENA entitled Objectively Assessed Housing Need Medway Unitary Authority and a Landscape Appraisal and Green Belt Review.

1.11 In respect of Green Belt, the Report provides a Landscape and Visual Appraisal of the Site and assesses the Site's contribution to the purposes of the Green Belt, in-line with National and Local planning policy. It concluded that the site was suitable to accommodate development and be removed from the Green Belt.

1.12 In respect of the OAN housing target, previous representations considered that a higher housing figure of 1,489 dwellings per annum should be pursued.

1.13 Overall, it was concluded that there was a need to meet a higher housing target and that there were suitable Green Belt sites that can meet that Housing requirement.

1.14 Since these representations, in September 2017, the Government released a draft standardised methodology for calculating housing need. This was further reinforced under proposals set out within the Draft Revised NPPF and Draft NPPG (March 2018). For Medway, the Standardised method sets out a figure of 37,143 homes over the Plan period until 2035 (1,665 dwellings per annum). This is an increase from the figure Barton Willmore suggested in its previous representations.

ii) Current Evidence Base

1.15 As part of the current consultation, Medway Council has released a number of relevant pieces of Evidence Base, namely:

- Sustainability Appraisal;
- Green Belt Assessment;
- SLAA 2018.

1.16 The Green Belt Assessment was released on xxx, only xx before the close of the consultation window. Notwithstanding, these representations have taken into account this evidence base and an updated Green Belt appraisal has been prepared.

2.0 NATIONAL PLANNING POLICY

i) National Policy & Plan Making

2.1 The NPPF (March 2012) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

(Para. 8)

2.2 The presumption in favour of sustainable development, as set out in the NPPF should be seen as a golden thread, running through both plan-making and decision-taking. For plan-making this means that:

- Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted.

(Para. 14).

2.3 LPAs should 'submit a plan for examination which it considers is "sound" – namely that 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 NPPF.
- (Para. 182).

2.4 The NPPF considers that Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified. (Para. 157).

2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. (Para. 158).

ii) National Policy & Housing Need

- 2.6 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, 'Objectively Assessed Needs' (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.
- 2.7 LPAs should plan for a housing mix which takes into account "housing demand and the scale of housing supply necessary to meet this demand." Household and population projections should also be a key consideration, taking into account of migration and demographic change. (Para. 159).
- 2.8 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

(Reference ID: 2a-015-20140306)

- 2.9 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

(Reference ID: 2a-015-20140306)

iii) National Policy & the Green Belt

- 2.10 Section 9 of the NPPF considers the protection of Green Belt land, in that its fundamental aim is to prevent urban sprawl by keeping land permanently open in order to maintain the essential Green Belt character of openness and their permanence. The NPPF (para 80) states that the Green Belt is intended to serve five purposes:

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

2.11 The NPPF (para 83) states that Green Belt boundaries, once established, should only be altered in exceptional circumstances, through the preparation or review of Local Plans. At that time, LPAs should consider the Green Belt boundaries having regard to their intended permanence to ensure they are capable of enduring beyond the plan period. LPAs should take account of the need to promote sustainable patterns of development and should consider channelling development towards urban areas, towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (para 84).

2.12 Para 85 of the NPPF considers that LPAs, when defining Green Belt boundaries, should:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green belt, in order to meet longer-term development needs stretching well beyond the plan period;
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

2.13 This is supported by the PPG, which states:

The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
(Reference ID: 3-044-20141006)

- 2.14 In September 2012, the Secretary of State for Communities issued a Ministerial Statement covering housing and growth. The Statement, amongst other matters, recognises the importance of protecting the Green Belt against urban sprawl whilst also acknowledging that LPAs can review local designations through plan-making, where appropriate to do so, to promote growth. The Statement notes that:

“We encourage councils to use the flexibilities set out in the National Planning Policy Framework to tailor the extent of Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered in reviewing or drawing up local plans, we will support councils to move quickly through the process by prioritising their Local Plan examinations... There is considerable previously developed land in many Green Belt areas, which could be put to more productive use. We encourage councils to make best use of this land, whilst protecting the openness of the Green Belt in line with the requirements in the National Planning Policy Framework.”

- 2.15 The Government recognises that Green Belt reviews can support growth under local circumstances.

iv) Duty to Co-operate

- 2.16 The ‘Duty to Co-operate’ between LPAs is a clear requirement of National planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to ‘strategic priorities’ as set out in para. 156. (Para. 178).
- 2.17 In addition, para. 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged. (Para. 180). LPAs are required to demonstrate how they have met the requirements of the ‘Duty to Co-operate during the plan-making process. (Para. 181).

v) Fixing Our Broken Housing Market (February 2017)

- 2.18 The recent Housing White Paper ‘Fixing our broken housing market’ (February 2017) reaffirms the Government’s commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.

- 2.19 Paragraph 1.29 states that plans should put in place policies to allow a good mix of sites to come forward for development to support small and medium sized sites, and thriving rural communities. Ensuring there is choice for consumers and that places can grow in ways that are sustainable.
- 2.20 Furthermore, paragraph 1.33 confirms the Government are seeking to amend the NPPF to expect local planning authorities to identify opportunities for villages to thrive. This has been carried through to the Draft Revised NPPF (March 2018), Rural Housing section.

a) Draft Revised NPPF (March 2018)

- 2.21 The Draft Revised NPPF was published for consultation in March 2018 and incorporates policy proposals previously consulted on in the Housing White Paper. The consultation closed on 10 May 2018. Whilst the revised NPPF is still in draft, it is anticipated¹ that the Medway Local Plan will be examined against the policy requirements of the new NPPF. It is thereby essential that MC has regard to the emerging NPPF policy requirements as it prepares the Regulation 19 Draft Plan.
- 2.22 The Draft Revised NPPF maintains a focus on the presumption in favour of sustainable development for plan-making and decision taking. Plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. Furthermore, 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 policies within the Framework that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development in the Plan area; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken a whole.
- 2.23 The Draft Revised NPPF retains its emphasis on significantly boosting the supply of homes, indicating that planning policies and decisions should help a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. (Para. 60).

¹ 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. Thereby this is very likely to be fully in force for the anticipated submission of the Medway Local Plan in March 2019.

- 2.24 Furthermore, in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method included within the draft Planning Practice Guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In establishing this figure, any needs that cannot be met within neighbouring areas should also be taken into account. (Para. 61)
- 2.25 Para. 75 notes that for applications which include housing, paragraph 11d of the Framework will apply if the LPA cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer), or where the Housing Delivery Test indicates that delivery of housing has been substantially (below 75% of the housing requirement) below the housing requirement over the previous three years.
- 2.26 Para. 79 sets out that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Furthermore, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Additionally, Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. (Para. 80).
- 2.27 In respect of Green Belt, the Draft Revised NPPF recognises that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or updating of plans. Furthermore, additional text is proposed, noting that Strategic plans should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period (Para. 135).
- 2.28 Furthermore, before concluding that exceptional circumstance exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This includes a strategy which; makes as much use as possible of suitable brownfield sites and underutilised land; optimises the density of development; and has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development (Para 136).
- 2.29 Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. (Para. 137)

- 2.30 A new chapter, 'Making effective use of land' encourages planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Furthermore, the Draft Revised NPPF considers that planning policies, and decisions need to reflect changes in the demand for land which should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Planning decisions should promote and support the development of under-utilised land and buildings, particularly where available sites could be used more effectively. (Para. 118) Support shall be provided for development that makes effective use of land through achieving appropriate densities and ensuring that developments make optimal use of the potential of each site.
- 2.31 As detailed above and in respect of the Site, the draft revised NPPF is likely to introduce some policy changes which will have significant implications for the ongoing preparation of the Medway Local Plan.

b) Draft Planning Practice Guidance (March 2018)

- 2.32 Alongside the Draft Revised NPPF, the Ministry of Housing Communities and Local Government (MHC&LG) undertook a consultation on draft updates to planning practice guidance.
- 2.33 The draft NPPG includes changes to Housing Delivery. The NPPF and Guidance requires Local Planning Authorities to have an identified five-year housing land supply at all points during the Plan period. The draft NPPG suggests the monitoring of a five-year land supply through an annual position statement. Moreover, LPA's should demonstrate that a five-year supply of deliverable housing sites, with the appropriate buffer, can be shown where it has been established in a recently adopted plan, or in a subsequent annual position statement. The starting point for calculating the five-year land supply should be housing requirement figures in local and strategic plans. However, where the plan is more than five years old and the housing figure needs revising, the starting point will be local housing need using the standard method.
- 2.34 The draft NPPG also sets out how the standard method for assessing Objectively Assessed Housing Need will be calculated.

3.0 DEVELOPMENT STRATEGY

Question DS1: 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?

- 3.1 Section 3 of the MCDSCD sets out four development scenarios for consultation based on different growth targets and associated spatial distribution of housing land with common approaches to employment and retail land within the strategy. This can be broadly summarised as identified within the table below:

Scenario		Locational Strategy	Estimated Capacity (Units)
1	Meeting Objectively Assessed Need	<ul style="list-style-type: none"> Strategy based on firstly directing growth to brownfield sites, proposed development of rural town at Hoo and some suburban expansion; Based on North Kent Strategic Housing and Economic Needs Assessment (2015) OAN figure of 29,463 homes over the Plan period. 	29,950
2	Investment in Infrastructure to unlock growth	<ul style="list-style-type: none"> Development at a faster pace on Hoo Peninsula supported by passenger rail service, upgrade capacity of highway networks. 	31,033
3	Meeting government's proposed calculation of Local Housing Need	<ul style="list-style-type: none"> Development on Hoo Peninsula; Land in the Capstone Valley and north and east of Rainham would be considered as potential allocations for development; development of the urban opportunity areas and achieving high densities on sites; Based on government's proposed standardised methodology which calculates a need for 37,143 homes over the Plan period. However this scenario still leaves a shortfall of 1,182 homes when compared against the Standard Method figure of 37,143 homes. 	35,961

Scenario		Locational Strategy	Estimated Capacity (Units)
4	Consideration of development within Lodge Hill SSSI	<ul style="list-style-type: none"> Incorporates emerging proposals by Homes England for a revised scheme at Lodge Hill for up to 2000 homes as part of a wider strategic development of the wider Hoo rural town. 	30,569

- 3.2 We recognise that scenario 3 seeks to deliver the highest quantum of growth from the above scenarios. However, it still falls short of meeting the Government's proposed Standardised Methodology for calculating housing need. The Draft Revised NPPF is clear that LPAs should meet their housing needs in full, and therefore MC needs to provide for the full Standard Method figure for Medway of 37,143 homes. **We recommend that MC seek to address this matter going forwards.**
- 3.3 Policy DS2: Spatial Development Strategy directs that the Council will consider a lesser scale of development in defined sites in suburban locations and also villages including Halling, where the principles of sustainable development can be met and where unacceptable impacts on infrastructure and the environment can be avoided.
- 3.4 The Scenarios assess a number of strategies across the Plan period. However, none of the scenarios assess a scenario that considered a minor review of the Green Belt. Whilst there is a relatively small proportion of designated Green Belt in the District, a de-minimus Green Belt release at appropriate locations is considered to be able to deliver sustainable development and potentially more suitable locations than other non-Green Belt locations.
- 3.5 By way of example, Scenarios 1, 3 and 4 propose a strategic allocation at Manor Farm, Marsh Road, Halling (SLAA ref. 1105). This recognises that Halling is an appropriate location for growth.
- 3.6 However, Site 1105 was assessed as 'Suitable' and Available' by Medway Council as part of the Strategic Land Availability Assessment (January 2017). This potential strategic allocation is located to the east of Halling Railway Station and comprises 1.11 hectares. The Medway SLAA 2015 Site Assessment Proforma (November 2015) indicates that the site has the potential to accommodate 32 dwellings; 11, 045 m2 of office land use; 4,420 m2 of land use; and 4,420 m2 of storage land use. The assessment concludes that the site is unsuitable for employment uses and mixed use unless the identified constraints can be addressed. We understand that the site is being actively promoted by the landowner for redevelopment for housing and as such is considered to be an 'Available' site.

- 3.7 The assessment however recognises that the site ref. 1105 has poor access to services and facilities; is situated outside of the built-up area, within an area of locally valued landscape of the Halling Marshes and development has been assessed by the Council to have a detrimental impact upon locally valued local landscapes.
- 3.8 In respect of the site's suitability for housing use, it is recognised that part of the site is subject to a high level of flood risk but considered albeit it is suggested this could be resolved and the site would pass the sequential test for flood risk. Development of this site could potentially pose a risk to SSSI as set out in Natural England guidance (Impact Risk Zones) and further assessment of the potential impacts of development upon designated habitats.
- 3.9 Site 1105 has considerable environmental constraints, some of which could be fundamental to its development. Further technical work is clearly required to assess its deliverability. The Site subject to these representations has no such environmental constraints and significantly less impact on the natural environment. The only main constraint is that of a policy constraint, namely Green Belt. It is not an environmentally sensitive site.
- 3.10 The Site is located adjacent to the recently constructed St. Andrew's Park development and would serve to complement this existing development, providing a similar character area. Development at the Site, in conjunction with St. Andrew's Park, would offer a mix of uses, supporting the residential development and benefiting the wider area. Furthermore, the St. Andrew's development will provide a range of community infrastructure facilities, supporting a thriving rural community. There are strong benefits that bringing forward a residential scheme at the Site would have on the sustainable growth and continuing vitality of Halling as a village over the plan period. These benefits have been largely overlooked due to the Site's location within the Green Belt.
- 3.11 In this respect, the spatial strategy scenarios have failed to adequately assess the suitability of minor Green Belt release in suitable locations such as Halling. This should be addressed in future consultation and these representations provide for a suitable evidence base to justify why minor Green Belt review in this location is entirely appropriate. Given the scale of housing required to be delivered (see answer below), it is likely that additional sites will be required to meet the housing target.
- 3.12 **RECOMENDATION: REVIEW SPATIAL OPTIONS TO INCLUDE OPPORTUNITY FOR MINOR GREEN BELT REVIEW AND TO MEET THE FULL GOVERNEMENTS STANDARDISED HOUSING NEED FIGURE.**

4.0 HOUSING

Question H1: Does the proposed policy for housing delivery represent a sound approach? Would you suggest an alternative approach?

- 4.1 In the light of our comments relating to the previous section, we consider that an alternative approach is required to deliver a sound plan. This includes increasing the housing requirement to meet the recognised standard needs and undertake appropriate Green Belt review.
- 4.2 Whilst we support and welcome the notion that the plan recognises that unidentified development would be supported that is of a lesser scale in rural areas (such as Halling), the Plan should seek to proactively address how it intends to meet the housing requirement with identified sites where they exist. We consider that a pragmatic approach to development within villages needs to be taken.
- 4.3 The development strategy should consider limited Green Belt release from areas that do not serve to fulfil the 5 key functions of the Green Belt. We have addressed this test within section 5 of these reps and **Appendix 4** but note that the Council only released its Green Belt report in the last week of the consultation window. Whilst it is acknowledged that comments will be received on this document after the close of the consultation, it is disappointing and frustrating that this report was not released in a more timely manner.
- 4.4 Notwithstanding, it is recognised that growth is needed in villages to promote vitality and we support that the Plan recognises the role that villages can play to meet the housing requirement. We note that three of the four development scenarios include a potential site allocation at Manor Farm, Marsh Road, Halling, but in the light of the need to find additional housing sites, and some concerns over the environmental impact the Manor Farm site could have, it is considered necessary that additional sites should be considered in Halling to make the Plan sound. Additional development in Halling would help to maintain and enhance the vitality of existing services and facilities located in the village and complement the under construction St Andrews Park which is establishing and expanding a new community in Halling. Additional housing sites would also mean that not all 'eggs are in one basket' for Halling as if for whatever reason the Manor Farm site did not come forward, this would result in Halling receiving no growth whatsoever. Additional allocations spreads this risk and provides for flexibility in the delivery of the plan.

i) Calculating Objectively Assessed Housing Need

- 4.5 As noted in Section 2 above, a key change emerging from the Draft NPPF is the requirement use the Government's 'standard methodology' to calculate Objectively Assessed Need (OAN).
- 4.6 The standard method OAN figure for Medway is 37,143 over the Plan period, which equates to 1,665 dwellings per annum. Whilst it is recognised this is a large uplift, it is considered that this target is achievable and that sites are available to meet this target. It would be a critical failure of the plan if it did not, as a starting point, seek to determine how it could meet this figure. The plan does not presently undertake this exercise and therefore the plan is unsound in this respect. To not seek to meet this target would be a fundamental failure of the Council to proactively tackle meeting its own housing needs and indeed play its part in meeting the wider housing crisis.
- 4.7 It is disappointing that the MCDSCD has not endorsed the full standard methodology OAN figure for Medway when both the Housing White paper and draft revised NPPF both direct LPAs to meet the standardised housing target in full.
- 4.8 MC must fully accept the standard method figure as a starting point and should seek to meet this requirement, as is consistent with achieving sustainable development. MC should not seek to promote and justify an alternative OAN.
- 4.9 Paragraph 61 of the draft NPPF is clear that the standard methodology should be used unless there are 'exceptional circumstance' that justify an alternative approach. Whilst these 'exceptional circumstances' are not defined in the draft NPPF, with its echoes of well-established Green Belt policy, it is clear that this is a very high bar.
- 4.10 Whilst the MCDSCD appears to indicate that an alternative OAN figure may be preferred going forward (namely the 2015 SHMA figure), the consultation document fails to set out the necessary 'exceptional circumstances' which would be required to justify the alternative approach. We consider that in the absence of a robust exceptional circumstances justification the Local Plan is unsound.
- 4.11 It is however noted that the consultation document states at paragraph 3.9 that:

"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."

- 4.12 We note that this is not an exceptional circumstances justification for alternative OAN methodology. Rather this is an explanation for why the OAN cannot be met. This thereby relates to the Local Plan 'strategy' and the tests of Soundness (Para. 36) and the Presumption in Favour of Sustainable Development (Para. 11), rather than OAN methodology.
- 4.13 We consider that the Council must accept the standard method figure and work back from this to assess if this can be accommodated in accordance with the Presumption (Para. 11b). Whilst there may be evidence that the full standard method OAN cannot be accommodated without the *"adverse impacts of doing so significantly and demonstrably outweighing the benefits"*, this must be clearly set out through the SLAA and SA.

Q.H2: Does the proposed policy for housing mix represent a sound approach? Would you suggest an alternative approach?

- 4.14 We agree with the approach taken to housing mix and the principle that the mix should be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.
- 4.15 We are concerned that Draft Policy H2 states that large development schemes meeting the criteria set out at draft Policy H9: Self-build and Custom Housebuilding, must demonstrate that sufficient consideration has been given to custom and self-build plots as part of the housing mix. There are challenges that need to be recognised with the inclusion of self-build plots on large sites. These challenges include the design of self-build plots could be out of character with the rest of the development; the build programme for such units would likely be more protracted; and the inclusion of self-build plots could present health and safety issues with other uncontrolled parties on large sites.

Question H3: Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision? What do you consider would represent an effective alternative approach?

- 4.16 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012 – 2037), the Local Plan period (2012 – 2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744dpa), which would constitute 58% of MC's identified OAN figure of 1,281dpa. The PPG advises that an increase in the total Local Plan housing figure should be considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).

- 4.17 The need for affordable housing nevertheless, should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *“the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”* (Para. 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing when taking account of the normal cost of development and mitigation, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 4.18 We acknowledge that the Draft Revised NPPF takes a different approach to viability, considering that this should be assessed at the Plan making stage and the use of viability assessment at the decision-making stage should not be necessary. Furthermore there are changes to the guidance on the methodology for assessing viability. Further guidance is required as to how this will work in practice.
- 4.19 We acknowledge that the Draft Revised NPPF takes a different approach to viability, considering that this should be assessed at the Plan making stage and the use of viability assessment at the decision-making stage should not be necessary. Furthermore there are changes to the guidance on the methodology for assessing viability. Further guidance is required as to how this will work in practice.
- 4.20 We would consider that in light of the highlighted need for affordable housing provision as identified in the North Kent SHMA (November 2015), seeking the provision of up to 25% affordable housing is appropriate although, further viability evidence, in line with the draft revised NPPF is required to robustly assess the proportion of affordable housing provision for both rural and urban areas, given the Plan-led approach to viability.

Question H4: What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

- 4.21 We consider that MC should develop policies related to affordable housing with reference to the draft revised NPPF, with flexibility to take into account the changes to the definition of affordable housing including the merging of social rented housing and affordable rented housing into one definition of affordable housing for rent, also encompassing Build to Rent schemes.

5.0 NATURAL ENVIRONMENT AND GREEN BELT

Question NE2: Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment?

What alternative approaches would you recommend to secure the favourable condition of these areas?

- 5.1 We support the Council's aspiration to promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks.

Question NE4: Do you consider that this is an effective approach to landscape policy in Medway?

What alternative approaches would you recommend?

- 5.2 We support the notion that new development should provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment.

Question NE6: Do you agree with the proposed policy for Green Belt?

Do you consider that the exceptional circumstances exist to justify the review of the Green Belt boundary?

- 5.3 We consider that exceptional circumstances do exist for a minor review of the Green Belt boundary within Medway. We understand that MC are currently working on producing a Green Belt Assessment to provide supporting evidence as to whether a review of the Green Belt within Medway needs to be undertaken. At the time of writing the document had not been published and consequently this has not been reviewed as part of these representations. We would like the opportunity to review and comment on this evidence base document when it is published.
- 5.4 We consider that it would have been useful to publish Green Belt evidence base studies as part of the Local Plan and included a scenario setting out potential Green Belt release. Without such a scenario the Plan has not considered all reasonable options and assessed those options through the Sustainability Appraisal.

- 5.5 The Draft Revised NPPF contains proposals for meeting further requirements to justify that exceptional circumstances exist for the release of Green Belt. Before concluding that exceptional circumstances justify the amendment of Green Belt boundaries, Local Planning Authorities “should have examined fully all other reasonable options for meeting [their] identified need for development” (para 136); reasonable options include consideration of whether the strategy ‘makes as much use as possible’ of suitable brownfield sites and underutilised land, optimises density of development, and demonstrates discussion with neighbouring authorities about unmet need accommodation (through the statement of common ground).
- 5.6 Furthermore, where the need for changes to the Green Belt boundary have been demonstrated by exceptional circumstances, “plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.” (Para.137) The Site meets this requirement as it is considered to be relatively well served by public transport including by local bus routes and Halling railway station is located approximately 850 metres to the south of the Site. Pedestrian access to the railway station will be via the pedestrian footbridge, delivered as part of the St. Andrew’s Park development.
- 5.7 The Draft Revised NPPF considers that when defining Green Belt boundaries, plans should (amongst other matters) define boundaries clearly using physical features that are readily recognisable and likely to be permanent (para. 138). The release of the Site from the Green Belt offers the potential to consolidate the settlement pattern and redefine the boundary of the Green Belt to a more appropriate boundary feature that is already perceived as the settlement edge (i.e. the built development along Pilgrims Road / Way). The land beyond Pilgrims Road / Way to the west is formed of well-wooded (including ASNW), steeply rising escarpment that would form a robust and defensible boundary likely to be of permanence.

i) Green Belt Review and Exceptional Circumstances: Case Law

- 5.8 As previously set out, Green Belt boundaries should only be altered in “exceptional circumstances”.
- 5.9 The Court of Justice case between Calverton Parish Council and Nottingham City Council and Others remains relevant, providing case law on Green Belt considerations in plan-making with detailed consideration of “exceptional circumstances.” Mr Justice Jay observed at paragraph 51:

In a case such as the present, it seems to me that, having undertaken the first-stage of the Hunston approach (sc. assessing objectively assessed need), the planning judgements involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:

- (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important);
- (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
- (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

5.10 Based on the above, the following provides an assessment of "exceptional circumstances" for the release of Green Belt land within the emerging Local Plan.

(i) The Acuteness/Intensity of the OAN (matters of degree may be important)

5.11 The Council should be seeking to meet the Government's standard method for calculating housing need and should address this particular point, ensuring that there are sufficient housing sites allocated to meet the full OAN.

(ii) The Inherent Constraints on Supply/Availability of Land Prima Facie Suitable for Sustainable Development

(iii) The Consequent Difficulties in Achieving Sustainable Development Without Impinging on the Green Belt

5.12 In regards to point ii and iii above, as noted in Section 4, a considerable area of Medway is covered by environmental designations where development should be restricted, including Ramsar, Special Protection Area and SSSI designations. Further areas are restricted by the presence of the AONB and areas at high risk of flooding. There is therefore an inherent constraint on the supply/availability of sites for sustainable development.

5.13 Draft Medway Local Plan Policy DS2: Spatial Development Strategy sets out that the Council will consider a lesser scale of development in defined sites in suburban locations and the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of

sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided. Furthermore, development scenarios 1, 3 and 4 propose a strategic allocation in South Halling (although this is not located within the Green Belt).

- 5.14 It is acknowledged that Halling is predominantly within the Green Belt, with land outside the Green Belt in Halling being significantly constrained due to flood risk. We consider that Halling has the potential for further sustainable growth.
- 5.15 In order to allow sustainable growth of Halling it is necessary to allow low level Green Belt release through the Local Plan.

(iv) The Nature and Extent of the Harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed)

- 5.16 The Green Belt covers wide areas of land in the Medway Valley and to the west of Strood. The release of the Site from the Green Belt is of de minimis scale in relation to the overall extent of the Green Belt, therefore resulting in only a minor change to the Green Belt boundary.

(v) The Extent to Which the Consequent Impact on the Purposes of the Green Belt may be Ameliorated or Reduced to the Lowest Reasonably Practicable Extent

- 5.17 It is demonstrated below, and in Section 7 of the supporting Landscape Appraisal and Green Belt Review (**Appendix 4**), that release of the Site from the Green Belt would have a limited impact upon the purposes of the Green Belt and serve to rationalise the Green Belt boundary.

ii) Landscape Appraisal and Green Belt Review

- 5.18 As noted above, we consider that the Site is suitable for minor and localised Green Belt release and demonstrates potential for development. An updated Landscape Appraisal and Green Belt Review has been carried out by Barton Willmore's Landscape Team as part of these representations and included at **Appendix 4**. The Report provides a Landscape and Visual Appraisal of the Site to assess the Site's contribution to the purposes of the Green Belt, in-line with National and Local planning policy.
- 5.19 The Site is set within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is bounded by residential properties to the north, west and south, with Formby Road located adjacent to the east of the Site. It is acknowledged that the Site is within the Green Belt, however, it is not subject to any other landscape-related or planning policy designations.

- 5.20 The Visual Appraisal concludes that “overall the Site is considered to be of low sensitivity as it is of low landscape value and it has a very localised visual envelope to the north, west and south due to the surrounding landform and landcover (vegetation and built form). Whilst the visual envelope to the east is more extended, the Site interior is only partially visible from certain locations, and where visible it is seen in conjunction with the adjacent existing residential and industrial development. The visual character is one of a semi-developed, urbanised landscape.” (Para. 5.15)
- 5.21 Furthermore, the Site is considered to be “inherently open due to it comprising an open field with areas of scrub and woodland. However, it is pertinent that the Site is physically adjoined on three sides by built development, with the existing development on Pilgrims Road / Way falling within the Green Belt designation (i.e. 'washed over' by the designated area). Despite the physical reduction in openness that would occur should the Site be developed, the perceived reduction would be limited. Any development will appear as a coherent extension to the existing settlement pattern and would be in keeping with the urbanised nature of the surrounding valley floor landscape. Moreover, the Site is contained by dense boundary vegetation and woodlands, which would serve to visually contain built forms and thus further diminish any potential perceived sense of sprawl.” (Para. 8.6)
- 5.22 The review of the Green Belt functions of the Site, as set out in the NPPF, indicates that the Site makes no contribution to checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns; makes a limited contribution to assisting in safeguarding the countryside from encroachment; and would not prejudice derelict land coming forward in future for development. (Table 7.1). In this case, we would consider that a localised review of the Green Belt is wholly justified bearing in mind the analysis of the merits of Green Belt functions as set out in the NPPF.
- 5.23 The Report concludes that releasing land from the Green Belt in this area would not cause any significant harm to Green Belt purposes and serve to rationalise the Green Belt boundary. Furthermore, by undertaking a Landscape and Visual Appraisal of the Site, the Report concludes that sympathetic development within the Site would be acceptable in landscape and visual terms and would result in limited to no effect on the function of the Green Belt.
- 5.24 Currently, the whole Site lies within designated Green Belt land and we consider that a robust case has been made to release the Site from the Green Belt, creating a logical extension of St Andrews Park as well as establishing a green wedge between the settlements, maintaining their separation.

6.0 TRANSPORT

Question T4: 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? For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare? Would it be appropriate to include Cuxton and Halling stations in Table 11.1?

- 6.1 We consider that it would be appropriate to include Cuxton and Halling railway stations within table 11.1 which demonstrates optimum net residential densities for core, primary, secondary and periphery locations. There is considered to be strong potential for future growth within these areas to enhance the continued vitality of villages. The Site is located approximately 850m from Halling railway station and falls largely within the 'primary' zone category (within a 10 minute/800m walk).

7.0 SITE SUITABILITY

i) Sustainable Development

- 7.1 The Site is located within a sustainable location, adjacent to the St. Andrew's Park development which is delivering a range of infrastructure and services. The Site is accessible, located adjacent to the local road network with access proposed directly onto the A228 and also served by local bus routes. Furthermore, the Site is located in close proximity to the strategic highway network and railway with the M2 located approximately 1 mile to the north of the Site and Halling railway station approximately 850 metres to the south of the Site. Pedestrian access to the railway station will be via the pedestrian footbridge, delivered as part of the St. Andrew's Park development.
- 7.2 The development would meet the three elements of sustainable development, as set out in the NPPF (para 7). Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has deliverable potential to contribute towards much needed housing within rural Medway and would deliver a mix of housing types, including an element of affordable housing.
- 7.3 The Site meets the NPPF's three dimensions of Sustainable Development and performs:
- *a social role*: by delivering housing that is of a suitable mix and quality including affordable to meet the need;
 - *an economic role*: in bringing forward employment opportunities during the construction phases, increased in labour force to the area, additional expenditure to the local economy by future residents and New Homes Bonus; and
 - *an environmental role*: in being well located to existing facilities and services as well as public transport routes. It will also provide for new areas of public open space and enhance biodiversity.
- 7.4 Furthermore, the development would help to enhance and maintain the vitality of the rural community of Halling, in line with Paragraph 55 of the NPPF.
- 7.5 The proposed provision of a green wedge to the northern part of the Site (as shown on the Site Location Plan at Appendix 1) would enable further ecological enhancements, as well as landscaping delivered in line with potential development of the Site.

- 7.6 We consider that release of the Site from the Green Belt is appropriate and logical as assessed within the accompanying Green Belt review. Furthermore, the Site is considered 'deliverable' in that it meets the requirements of footnote 11 of the NPPF and it has been demonstrated that the Site is currently available for development, will offer a suitable location for development and has a realistic prospect of housing being delivered on the Site within five years and that development of the Site is viable.
- 7.7 Furthermore, the Site is in single ownership and has/is being promoted for residential development. It is therefore 'available' for development.
- 7.8 The Site can be delivered in the first 5 years of the plan period and there are no overriding technical constraints to delivery. It is therefore 'achievable'.

8.0 CONCLUSIONS

- 8.1 These representations are submitted on behalf of Redrow Homes who has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 8.2 These representations focus on promoting Redrow Homes' site known as 'The North Field, Halling'. The Site forms part of the wider St. Andrew's Park Development which is currently being built out by Redrow Homes. The Site currently lies within the Green Belt.
- 8.3 The representations are supported by technical reports in respect of a Landscape Assessment and Green Belt review.
- 8.4 We recognise that scenario 3 seeks the greatest level of growth but it is likely to be considered unsound as it does not meet the Government's proposed Standardised Methodology for calculating housing need in full. We **recommend** that MC seek to address this matter going forwards.
- 8.5 Presently we consider that the Plan is **unsound** as set out within the NPPF, for the following reasons:
- Positively prepared – The MCDSCD does not seek to meet the full OAN set out within the Government's Standard Method figure for Medway of 37,143 homes in any development scenario. MC should be seeking to meet the standard method figure as a starting point.
 - Justified – The MCDSCD has not taken into account all reasonable options as it has not taken into consideration the MC Green Belt Assessment as part of a proportionate evidence base, to include a scenario setting out potential Green Belt release. Without such a scenario the Plan has not considered all reasonable options and assessed those options through the Sustainability Appraisal.
 - Effective – In order to meet the Government's Standard Method OAN, the Plan should ensure that enough housing sites are allocated to achieve a Plan that is deliverable. The Site would make a valuable contributions to meeting this need.
 - Consistent with national policy – It is very likely that the Plan will be examined under the new planning regime being brought forward through the draft revised NPPF which is expected to come into force during Summer 2018. It is critical that the next iteration of the Plan takes into account changes to the NPPF and is aligned with its policy direction.

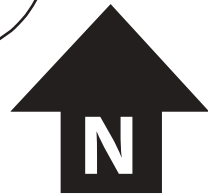
- 8.6 We maintain that the Site represents an appropriate location for residential development, which has been shown to be suitable for release from the Green Belt under a localised Green Belt review. Furthermore, “exceptional circumstances” exist to allow amendment to the Green Belt boundary through the Local Plan process. Development of the Site would form a logical extension to the under construction St Andrews Park, while maintaining separation between Halling and North Halling.

APPENDIX 1

North Field, Halling Site Location Plan



A2



0 50m 100m
(1:1250)

NOTES

Permission is granted to scale from this drawing for the purpose of Local Authority Planning Approval only. In all other circumstances DO NOT scale from this drawing, please contact this office for any additional information required.
Contractors, Sub Contractors and Suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.
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REV	DESCRIPTION	DATE	AUTHOR	CHK'D
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KEY

- Site boundary
- Land also owned by applicant
- Location of residential development
- Site access
- Proposed planting
- Existing trees

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PROJECT
Former Cemex Site - North Field
Halling, Kent
For: Redrow Homes South East

DRAWING
Location Plan - 01

SCALE	DATE	AUTHOR	CHK'D
1:1250 @ A2	02/04/14	RB/AW	RB

JOB NO.	DRAWING NO.	REV
REDR131007	LP-01	-

APPENDIX 2

**Representations to Medway Council Local Plan Development Options Consultation
(March 2017)**

REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN 2012 – 2035

Development Options Consultation Document

Submitted on Behalf Of
Redrow Homes (South East)

March 2017

**REPRESENTATIONS TO MEDWAY COUNCIL
LOCAL PLAN
2012 – 2035**

**DEVELOPMENT OPTIONS
CONSULTATION DOCUMENT**

**SUBMITTED ON BEHALF OF
REDROW HOMES (SOUTH EAST)**

Project Ref:	23486/A5/JM
Status:	Final
Issue/Rev:	01
Date:	29 March 2017
Prepared by:	Joshua Mellor
Checked by:	Andrew Wilford
Authorised by:	Andrew Wilford

Barton Willmore LLP
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

Ref: 23486/A5/JM/kf
Date: 29 March 2017

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APPENDICES

Appendix 1:	North Field, Halling Site Location Plan
Appendix 2:	Representation to Medway Council Local Plan Issues & Options (Barton Willmore, February 2016)
Appendix 3:	SLAA Site 352 - North Field, Halling - Assessment Proforma

1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Redrow Homes (South East) in response to Medway Council's Local Plan 2012 – 2035 Development Options Consultation Document (MCD OCD) published in January 2017. As a landowner within Medway, Redrow Homes has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 1.2 These representations focus on promoting Redrow Homes' site known as 'The North Field, Halling' (The Site). A Site Location Plan is included at **Appendix 1**.
- 1.3 The Site forms part of the wider St. Andrew's Park Development which is currently being built out by Redrow Homes (hybrid planning application reference: MC/12/1791) for 385 dwellings and associated mix of uses. The Site currently lies within the Green Belt.
- 1.4 The Site is identified as SLAA site reference 352 in the Medway SLAA 2015 and 2017 (site reference 352). The SLAA 2017 concludes that the site is unsuitable for allocation. The Site comprises 6.84ha and is bound by residential development to the north, west and south. The A228 runs directly to the east of the site.
- 1.5 The Site itself is currently an unmanaged, sloping field with land rising from east to west, comprising a block of woodland in the southern corner adjoining the A228 and an area of scrub/woodland to the south-western corner adjoining Pilgrims Way/Road. A low voltage (33kv) overhead powerline crosses from west to east on the southern edge of the Site.
- 1.6 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework [NPPF] (March 2012) and National Planning Practice Guidance [NPPG] (March 2014).
- 1.7 The MCD OCD forms the first formal stage in the Local Plan's preparation (under Regulation 18 of the Local Plan Regulations). Representations were previously submitted to Medway Council's Local Plan Issues and Options Consultation in February 2016, a copy of which are included in **Appendix 2**.
- 1.8 These representations focus on relevant matters relating to the release of the Site for residential dwellings and address the following:

- Section 2 – National Planning Policy
- Section 3 – Vision and Strategic Objectives
- Section 4 – Delivering Sustainable Development - Options
- Section 5 – North Field, Halling

i) Previous Representations

- 1.9 Representations were submitted in February 2016 to the Local Plan Issues and Options Consultation (February 2016). A copy can be found in **Appendix 2**. These representations included a Barton Willmore Research critique of the published SHENA entitled Objectively Assessed Housing Need Medway Unitary Authority.
- 1.10 The representations also included a Landscape Appraisal and Green Belt Review. The Report provides a Landscape and Visual Appraisal of the Site and assess the Site's contribution to the purposes of the Green Belt, in-line with National and Local planning policy.
- 1.11 The previous representations outlined concerns with the identified OAN housing target and that a higher housing figure should be pursued and that there were suitable sites that can meet the Housing requirements to be released from the Green Belt.
- 1.12 These representations maintain the position that the OAN should be higher for Medway, and that a Green Belt Review should be undertaken to establish the minor Green belt release of this site in Halling.
- 1.13 The release of the Site will provide housing to be delivered in this rural part of Medway and sit alongside recently constructed development that will complement the St. Andrew's Park development and contribute to the character of Medway in this location.

2.0 NATIONAL PLANNING POLICY

i) National Policy & Plan Making

2.1 The NPPF (March 2012) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:-

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

(Para. 8)

2.2 The presumption in favour of sustainable development, as set out in the NPPF should be seen as a golden thread, running through both plan-making and decision-taking. For plan-making this means that:

- Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted.

(Para. 14).

2.3 LPAs should 'submit a plan for examination which it considers is "sound" – namely that 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 NPPF.
- (Para. 182).

2.4 The NPPF considers that Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified. (Para. 157).

2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. (Para. 158).

ii) National Policy & Housing Need

- 2.6 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, 'Objectively Assessed Needs' (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.
- 2.7 LPAs should plan for a housing mix which takes into account "housing demand and the scale of housing supply necessary to meet this demand." Household and population projections should also be a key consideration, taking into account of migration and demographic change. (Para. 159).
- 2.8 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

(Reference ID: 2a-015-20140306)

- 2.9 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

(Reference ID: 2a-015-20140306)

iii) National Policy & the Green Belt

- 2.10 Section 9 of the NPPF considers the protection of Green Belt land, in that its fundamental aim is to prevent urban sprawl by keeping land permanently open in order to maintain the essential Green Belt character of openness and their permanence. The NPPF (para 80) states that the Green Belt is intended to serve five purposes:

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

2.11 The NPPF (para 83) states that Green Belt boundaries, once established, should only be altered in exceptional circumstances, through the preparation or review of Local Plans. At that time, LPAs should consider the Green Belt boundaries having regard to their intended permanence to ensure they are capable of enduring beyond the plan period. LPAs should take account of the need to promote sustainable patterns of development and should consider channelling development towards urban areas, towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (para 84).

2.12 Para 85 of the NPPF considers that LPAs, when defining Green Belt boundaries, should:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green belt, in order to meet longer-term development needs stretching well beyond the plan period;
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

2.13 This is supported by the PPG, which states:

The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
(Reference ID: 3-044-20141006)

iv) Duty to Co-operate

- 2.14 The 'Duty to Co-operate' between LPAs is a clear requirement of National planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in para. 156. (Para. 178).
- 2.15 In addition, para. 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged. (Para. 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-operate' during the plan-making process. (Para. 181).

v) Fixing our Broken Housing Market (February 2017)

- 2.16 The recent Housing White Paper 'Fixing our broken housing market' (February 2017) reaffirms the Government's commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.
- 2.17 Paragraph 1.29 states that plans should put in place policies to allow a good mix of sites to come forward for development to support small and medium sized sites, and thriving rural communities. Ensuring there is choice for consumers and that places can grow in ways that are sustainable.
- 2.18 Furthermore, paragraph 1.33 confirms the Government are seeking to amend the NPPF to expect local planning authorities to identify opportunities for villages to thrive.

3.0 VISION AND STRATEGIC OBJECTIVES

- 3.1 Section 2 of the MCDOCD sets out the context within the Local Plan will operate, identifying a projected 20% population increase in the District over the life of the plan. Paragraph 2.8 notes that a key task for the Local Plan is to manage growth to achieve development which delivers benefits for local people, including housing, new services and facilities.
- 3.2 As confirmed by paragraph 2.31 of the MCDOCD the Local Plan is an opportunity to establish a positive strategy to guide Medway's development over the next 18 years. The MCDOCD sets out a vision for 2035 which identifies, among other points, that new development in Medway's towns and villages will have responded positively to the character of the surrounding environment and the needs of existing communities.
- 3.3 Paragraph 2.39 identifies the Strategic Objectives underpinning the Local Plan to deliver the development and infrastructure needs of the District, whilst protecting and enhancing the natural, built and historic environment, including to provide for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs. Furthermore, the objectives seek to strengthen the role of Medway's town, neighbourhood and village centres to secure a range of accessible services and facilities for local communities.
- 3.4 We **support** the vision and strategic objectives identified by the Council.
- 3.5 Residential development on the Site at North Field, Halling, would help to deliver growth in a location where there is very limited capacity for development, due to constraints such as the AONB and lack of alternative available land. Development in Halling would help to maintain and enhance the vitality of existing services and facilities located in the village and complement the under construction St Andrews Park which is establishing and expanding a new community in Halling.

3.0 DELIVERING SUSTAINABLE DEVELOPMENT - OPTIONS

i) Objectively Assessed Need

- 4.1 The North Kent Strategic Housing and Economic Needs Assessment (SHENA, March 2015), jointly produced between Medway Council and Gravesham Borough Council, identifies a need for 29,463 homes in Medway Council area over the plan period (or 1,281 dwellings per annum), as acknowledged in Section 3 of the MCDOD. This is the same evidence base as consulted on in Medway Council's Local Plan Issues and Options Consultation (MCIOD, February 2016).
- 4.2 We maintain the concerns raised in our previous representations to the Local Plan Issues and Options Consultation, included in **Appendix 2**, and do not consider that the housing needs calculated for Medway over the plan period have been appropriately assessed.
- 4.3 In summary, the Report critiques the OAN of 1,281 dpa derived from Medway Council and does not consider it to represent an accurate representation of the full OAN for Medway over the Plan period (2012 – 2035) for the following reasons:
- There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position, based on the 2012-based CLG household projection is for provision of 1,323 dwellings per annum, 2012-2035;
 - The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The North Kent SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are 'positively prepared' an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;
 - The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very minimum projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;

- The North Kent SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The North Kent SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined above we believe to be inappropriate;
- The North Kent SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The North Kent SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south-east region, and the national average. The North Kent SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the North Kent SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The North Kent SHENA and MCDOCD identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the North Kent SHENA does not address the significant affordable housing need in Medway.

- 4.4 The Report confirms that the starting point estimate and once other factors are taken into consideration could be as high as **1,489 dwellings per annum**.
- 4.5 Furthermore, since the previous consultation and production of the Report, new 2014-based CLG household projections have been released which identify an increase in household projection by approximately 5.4% from the 2012-based projects. As such, the full OAN could be in excess of that identified in the Report based on the more up-to-date 2014 projections.
- 4.6 Therefore, we **do not** consider that the assessed housing need, as calculated by Medway Council is "sound" or in line with National planning policy. The Council will need to address this and ensure there are sufficient housing sites allocated to meet the full OAN.

ii) Identified Supply of Development Land

4.7 Paragraph 3.7 of the MCDOD sets out the Council's current anticipated supply of development land, as shown below in Table 4.1.

Table 4.1: Medway's Current Supply of Development Land

	Status	Number of Dwellings
A	Completions 2012-2016	2,180
B	Sites with planning permission	6,251
C	Medway Local Plan 2003 Allocations	356
D	SLAA Pipeline sites	8,813
E	Windfalls (Years 3-5 only)	606
F	Total	18,206

4.8 The Annual Monitoring Report (AMR) 2016 (Volume 2, Section 8) provides the list of SLAA residential pipeline sites, totalling 8,813 units for the Plan period. This list includes a number of Medway Local Plan 2003 Allocations, which are however listed as a separate source of supply above (Row C). As a result, it appears that such sites (i.e. Medway Local Plan 2003 Allocations) are accounted for as both a separate source of supply and a SLAA pipeline site i.e. have been double counted in the overall supply (Row F).

4.9 It is recommended that the Council revisits the inclusion of Medway Local Plan 2003 Allocations to ensure such sites are only accounted for once, to ensure MC's position is robust.

4.10 It is also noted that the January 2017 SLAA only identifies a potential capacity of 5,980 dwellings on sites deemed to be suitable, available and achievable for residential development; thereby conflicting with MC's figure of 8,813 units (Row D), published in the MCDOD at the same time of the SLAA's release.

4.11 The 2016 AMR list of SLAA pipeline sites also includes Lodge Hill for 5,000 dwellings in the Plan period. This conflicts with the MCDOD position (para 3.39) in which the development site is phased in the second half of the Plan period (2025-2035) given the present uncertainty. This will allow for consideration of the outcome of the Public Inquiry and allow time for alternative sources of land supply to be planned, if required.

- 4.12 The reliance of Lodge Hill for 5,000 units in the Plan period (in Row D) is not considered to be appropriate or realistic. It is contrary to the content and intentions of the MCDOCD to address future uncertainties by phasing development after the Plan period. Notwithstanding the site's continued uncertainty, it is also wholly unrealistic to anticipate 5,000 dwellings to be delivered in 2025-2035, which would require 500 dwellings to be built per annum.
- 4.13 The total supply of SLAA pipeline sites should be amended to be in accordance with the MCDOCD's position, which will significantly reduce the total supply of current development land in Medway. Additional land is therefore required to provide an identified supply of land to meet the development needs of circa 30,000 dwellings for the Plan period.
- 4.14 Furthermore, additional sources of supply may be required to address the potential exclusion of Lodge Hill.

iii) Options for Growth

- 4.15 The Council acknowledge, in paragraph 3.9, that it is unlikely that the full range of development needs will be met solely in identified regeneration areas on brownfield land. Therefore, greenfield sites in the suburban and rural areas may have to form a part of the Local Plan development strategy. However, the greenfield land should be free from environmental constraints, of lesser value for landscape and agricultural purposes, and well related to services and infrastructure. We **support** this position in Principle.
- 4.16 A considerable area of Medway is covered by environmental designations where development should be restricted, including wide swathes of the Hoo Peninsula, covered by Ramsar, Special Protection Area and Site of Special Scientific Interest designations. Furthermore, land in the Medway Valley and to the south of the urban area is in the Kent Downs Area of Natural Beauty. Additionally, the metropolitan Green Belt covers land in the Medway Valley and to the west of Strood. The MCDOCD acknowledges these constraints, as well as acknowledging the high risk of flooding across parts of the district, where inappropriate development, including housing, should be avoided.
- 4.17 The Medway Integrated Growth Needs Assessment (November 2015) identifies that while there is a need to reinvigorate town centres and deliver sustainable development in locations that maximise existing infrastructure, the results of the Housing Needs Survey have indicated a desire for access to housing in rural areas. Furthermore, rural areas should be allowed to grow and diversify, through the provision of a range of property types, including some smaller units, helping to underpin their wider offer. The North Kent Strategic Housing Mark Assessment (November 2015) identifies that the main rural wards in Medway are Cuxton, Halling, Peninsula and Strood Rural. Growth in these main rural wards should be supported.

- 4.18 The MCDOCD identifies a range of scenarios demonstrating potential development patterns for the district, seeking to ensure sustainable growth, including offering access to services and facilities, while respecting the different aspects of the areas' environment.
- 4.19 All 4No. potential scenarios include incremental expansions of villages, as shown on the maps included in Appendix 1B-1E of the MCDOCD, including Halling, Cuxton, Cliffe Woods, Cliffe, High Halstow, Allhallows, Grain and Lower Stoke. We support the recognition that the Villages should be supported with development growth in order to maintain their vitality and viability.
- 4.20 Scenario 1 (Maximising the potential of urban regeneration) seeks to maximise development on brownfield sites, including redevelopment of employment sites at Medway City Estate and Chatham Docks. Appendix 1B of the MCDOCD identifies that there would be challenges associated with the delivery of large scale regeneration, including land assembly and impacts on transport networks. The scenario also identifies up to 7,000 dwellings being delivered across suburban and rural growth areas.
- 4.21 Scenario 2 (Suburban expansion) includes potential urban extensions around Rainham, Capston and Strood, as well as the delivery of up to 3,000 dwellings at Lodge Hill and 2,000 dwellings at Hoo St Werburgh. Appendix 1C of the MCDOCD identifies that for this option a particular issue is the consideration of the review of the Green Belt boundary to bring forward development land. Furthermore, it notes that the consultation and ongoing work will determine if there is a need to release land in the Green Belt or if provision for development needs can be met in other areas. The scenario identifies growth of villages to deliver 900 homes.
- 4.22 Scenario 3 (Rural focus) identifies potential for significant expansion of Hoo St Werburgh into a small town, including development of up to 6,500 dwellings, alongside up to 3,000 dwellings at Lodge Hill and 2,600 dwellings across the villages of Cliffe, Cliffe Woods, High Halstow, Lower Stoke, Allhallows and Grain. As noted in Appendix 1D, the scale of growth proposed in this scenario would require significant infrastructure investment. The scenario also identifies wider rural development to provide for a choice of sites, including 180 dwellings in the Medway Valley.
- 4.23 Scenario 4 (Urban regeneration and rural town) also identifies potential for significant growth in Hoo St Werburgh, for up to 6,500 dwellings, alongside the urban regeneration at Chatham Docks, Medway City Estate, Chatham and Strood waterfront and central areas, Mill Hill, and estate renewal in Tywdall to deliver 6,500 dwellings. The issues identified in Scenario 1 and 3 relating to the delivery of large scale regeneration and significant infrastructure investment

are re-iterated for this scenario. The scenario identifies the provision of 650 dwellings across villages through incremental growth.

- 4.24 Paragraph 4.5 of the MCD OCD confirms that further work and supporting technical studies will be undertaken to help determine the capacity for areas to accommodate development and the most sustainable locations for growth. However, given the constraints to development within Medway Council area, and the identified shortfall between housing requirements and identified supply, we consider that a combination of the proposed scenarios will need to be considered to meet the growth requirements.
- 4.25 As part of the further work being undertaken by Medway Council we **would support** a review of the Green Belt boundary in Halling to assess the development potential of land that no longer meets the five purposes of the Green Belt as set out in the NPPF. This is especially in the light of the required housing numbers.
- 4.26 As noted above, any strategy for growth will need to have consideration to the desire for an increased access to housing in rural areas, which should be allowed to grow and diversify. The final growth strategy for Medway will include the growth of villages, including those in the Medway Valley, to meet the identified range of development needs for the district.
- 4.27 The Site, at North Field, Halling, would support the growth scenarios as set out in the MCD OCD, allowing for incremental growth of the village of Halling. Furthermore, as demonstrated in Section 5 of these representations the Site is suitable for localised Green Belt release. As such, the Site is put forward for allocation for residential development to help deliver Medway's housing need.

5.0 NORTH FIELD, HALLING

i) Previous Site Assessment

5.1 The Site at North Field, Halling, was put forward to Medway Council's 'call for sites' Strategic Land Availability Assessment (SLAA) in May 2014. The Site previously formed part of the wider 'Former Cement Works' which was identified (also as SLAA site reference 352) as being a Potential Housing Site for 525 dwellings in the SLAA 2010.

5.2 The SLAA 2015, and subsequent 2017 update, set out to identify sites with development potential for allocation as part of the emerging Local Plan. As part of the SLAA 2015, the methodology undertaken enabled Medway Council to carry out Stage 1 (Site Identification) and Stage 2 (Site Assessment) of the Planning Policy Guidance methodology. The Stage 1 process enabled a number of sites to be excluded for further assessment should they be constrained by a restrictive designation, although sites within the Green Belt were not excluded at this stage. As the Site was not excluded at Stage 1 it was therefore assessed at Stage 2.

5.3 In regards to Green Belt sites, the SLAA 2015 recognises at paragraph 4.20 that:

"given the scale of development needs that Council must accommodate over the Plan Period, it was considered appropriate and robust that Green Belt land should be subject to detailed assessment at stage 2. However, whilst Green Belt land has been assessed at stage 2, this does not comprise a Green Belt Review. The Council intends to undertake a Green Belt review separately as part of the Local Plan evidence base; this will specifically consider whether land performs Green Belt functions and meets Green Belt purposes, rather than simply whether a site is suitable for development." (2015;13)

5.4 Stage 2 (Site Assessment) of the SLAA 2015 identified the overall suitability of sites based on a number of criteria, assessed through a Site Assessment Proforma (November 2015, **Appendix 3**) providing an assessment of each site's suitability utilising a 'traffic light' methodology, with Green equating to unconstrained, Yellow being constraints that can be resolved and Red equalling unresolvable constraints.

5.5 In regards to whether a site is suitable the SLAA 2015 concludes at paragraph 4.111 that:

"A site was considered suitable for development on the basis that no unresolvable constraints had been identified in respect of any of the individual criteria i.e. a site had received no Red RAG Ratings. One or more Red RAG Ratings means the site is

considered unsuitable for the purposes of this assessment”
(2015;31)

- 5.6 The Stage 2 assessment and Proforma for the Site concluded that the site is subject to some potential development constraints, however it is considered that these could be resolved. The Site received no 'Red ratings and as such. However, despite the definition of a suitable site detailed above, the Site was identified as unsuitable site in Appendix vi of the SLAA 2015.
- 5.7 An updated SLAA (January 2017) has been produced as part of the current consultation which updated some aspects of the methodology and considered additional information regarding sites. The updated SLAA confirms that the Site meets the criteria for Stage 1, 2, 3 and 3a (Screening) in that it is not a completed site, does not have an existing planning permission, is not located within a National or International environment designation (such as AONB) and is not located in a high flood risk area. However, the SLAA 2017 concludes that the Site does not meet the criteria for Stage 4 (Suitability). No proforma is included with the SLAA 2017, therefore no detail provided regarding the aspects of 'suitability' the Site failed to meet.
- 5.8 The SLAA 2017 Stage 4 criteria includes, ecological potential, designated habitats, highway network capacity, noise, residential amenity, open space, employment land, proximity to centres, education facilities, open spaces, transport, site access, landscape and environment, heritage, flood risk, air quality, contamination and agricultural land. No clarification is provided as to whether sites have been excluded at this stage due to their location in the Green Belt.
- 5.9 At this time, no Green Belt review has been undertaken by the Council as part of the evidence to support this consultation. However it is acknowledged that paragraph 1.8 of the MCDODD states a Green Belt review is being undertaken as part of the evidence base to inform the Local Plan. We **support** this review. Furthermore, we consider it appropriate that when such a review of the Green Belt is undertaken to meet OAN requirements, the SLAA would be updated to reflect this changing circumstance.

ii) Green Belt Review and Exceptional Circumstances

- 5.10 As identified in Section 2, Green Belt boundaries should only be altered in “exceptional circumstances”. The recent Court of Justice case between Calverton Parish Council and Nottingham City Council and Others¹ provides the most recent case law on Green Belt

¹ *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council* [2015] EWHC 1078 (Admin)

considerations in plan-making and provides the most detailed consideration of “exceptional circumstances”. Mr Justice Jay observed at paragraph 51:

In a case such as the present, it seems to me that, having undertaken the first-stage of the Hunston approach (sc. assessing objectively assessed need), the planning judgements involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:

- (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important);**
- (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;**
- (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;**
- (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and**
- (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.**

5.11 Based on the above, the following provides an assessment of “exceptional circumstances” for the release of Green Belt land within the emerging Local Plan.

i) The Acuteness/Intensity of the OAN (matters of degree may be important)

5.12 As identified in Section 4, the OAN Critical Review identifies that the Council's OAN figure/housing provides an underestimate of housing need for the district. In addition, new data releases have been published since the production of housing evidence work, which provide a new starting point for assessing housing need. The Council need to address this and ensure there are sufficient housing sites allocated to meet the full OAN.

ii) The Inherent Constraints on Supply/Availability of Land Prima Facie Suitable for Sustainable Development

iii) The Consequent Difficulties in Achieving Sustainable Development Without Impinging on the Green Belt

5.13 In regards to point ii and iii above, as noted in Section 4, a considerable area of Medway is covered by environmental designations where development should be restricted, including Ramsar, Special Protection Area and SSSI designations. Further areas are restricted by the

presence of the AONB and areas at high risk of flooding. There is therefore an inherent constraint on the supply/availability of sites for sustainable development.

- 5.14 The growth scenarios contained within the MCD OCD, as well as the housing evidence underpinning this, support sustainable incremental growth of villages, including the village of Halling. Halling is predominately in the Green Belt, with land outside of the Green Belt in Halling being significantly constrained due to flood risk.
- 5.15 In order to allow sustainable growth of Halling it is necessary to allow low level Green Belt release.

iv) The Nature and Extent of the Harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed)

- 5.16 The Green Belt covers wide areas of land in the Medway Valley and to the west of Strood. The release of the Site from the Green Belt is of de minimis scale in relation to the overall extent of the Green Belt, therefore resulting in only a minor change to the Green Belt boundary.

v) The Extent to Which the Consequent Impact on the Purposes of the Green Belt may be Ameliorated or Reduced to the Lowest Reasonably Practicable Extent

- 5.17 It is demonstrated below, and in Section 7 of the supporting Landscape Appraisal and Green Belt Review (**Appendix 2**), that release of the Site from the Green Belt would have a limited impact upon the purposes of the Green Belt and serve to rationalise the Green Belt boundary.

iii) Landscape Appraisal and Green Belt Review

- 5.18 As noted above, we consider that the Site is suitable for localised Green Belt release and demonstrates potential for development. A Landscape Appraisal and Green Belt Review has been carried out by Barton Willmore's Landscape Team as part of the representations submitted previously and included at **Appendix 2**. The Report provides a Landscape and Visual Appraisal of the Site to assess the Site's contribution to the purposes of the Green Belt, in-line with National and Local planning policy.
- 5.19 The Site is set within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is bounded by residential properties to the north, west and south, with Formby Road located adjacent to the east of the Site. It is

acknowledged that the Site is within the Green Belt, however, it is not subject to any other landscape-related or planning policy designations.

- 5.20 The Visual Appraisal of the Site demonstrates that the Site is “partially visible from its immediate surroundings, however, views are typically filtered by intervening vegetation. More open views into the Site are obtained from land to the east of the River Medway, however, where these views are obtained, the Site is seen in an urbanised context of the lower slopes of the Medway Valley, beyond which land rises to form a predominantly wooded backdrop to the views.” (Para. 8.6).
- 5.21 The review of the Green Belt functions of the Site, as set out in the NPPF, indicates that “the Site makes no contribution to checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns; makes a limited contribution to assisting in safeguarding the countryside from encroachment; and would not prejudice derelict land coming forward in future for development.” (Para. 8.8). In this case, we would consider that a localised review of the Green Belt is wholly justified bearing in mind the analysis of the merits of Green Belt functions as set out in the NPPF.
- 5.22 The Report concludes that releasing land from the Green Belt in this area would not cause any significant harm to Green Belt purposes and serve to rationalise the Green Belt boundary. Furthermore, by undertaking a Landscape and Visual Appraisal of the Site, the Report concludes that sympathetic development within the Site would be acceptable in landscape and visual terms and would result in limited to no effect on the function of the Green Belt.
- 5.23 Currently, the whole Site lies within designated Green Belt land and we consider that a robust case has been made to release the Site from the Green Belt, creating a logical extension of St Andrews Park as well as establishing a green wedge between the settlements, maintaining their separation.

iv) Sustainable Development

- 5.24 The Site is located within a sustainable location, adjacent to the St. Andrew's Park development which is delivering a range of infrastructure and services. The Site is accessible, located adjacent to the local road network with access proposed directly onto the A228 and also served by local bus routes. Furthermore, the Site is located in close proximity to the strategic highway network and railway with the M2 located approximately 1 mile to the north of the Site and Halling railway station approximately 850 metres to the south of the Site.

Pedestrian access to the railway station will be via the pedestrian footbridge, delivered as part of the St. Andrew's Park development.

- 5.25 The development would meet the three elements of sustainable development, as set out in the NPPF (para 7). Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has deliverable potential to contribute towards much needed housing within rural Medway and would deliver a mix of housing types, including an element of affordable housing.
- 5.26 Furthermore, the development would help to enhance and maintain the vitality of the rural community of Halling, in line with Paragraph 55 of the NPPF. Paragraph 10.15 of the MCDOD acknowledges that this is particular issue, with rural communities being particularly vulnerable to the loss of community facilities.
- 5.27 The proposed provision of a green wedge to the northern part of the Site would enable further ecological enhancements, as well as landscaping delivered in line with potential development of the Site.
- 5.28 We therefore conclude that the Site should not be precluded from progressing beyond Stage 4 of the SLAA 2017, as there are no unresolvable constraints which exist on the Site, subject to the Green Belt review. Furthermore, the Site is considered 'deliverable' in that it meets the requirements of footnote 11 of the NPPF and it has been demonstrated that the Site is currently available for development, will offer a suitable location for development and has a realistic prospect of housing being delivered on the Site within five years and that development of the Site is viable.

6.0 CONCLUSIONS

- 6.1 These representations are submitted on behalf of Redrow Homes who has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 6.2 These representations focus on promoting Redrow Homes' site known as 'The North Field, Halling'. The Site forms part of the wider St. Andrew's Park Development which is currently being built out by Redrow Homes. The Site currently lies within the Green Belt.
- 6.3 The representations are supported by technical reports in respect of Objectively Assessed Needs and a Green Belt review.
- 6.4 We do not consider that the OAN target of 1,281dpa is sound. It falls short of the starting point estimate and once other factors are taken into consideration, could be in excess of 1,489dpa. This matter should be addressed by the Council who need to ensure that there are sufficient housing sites allocated to meet the full OAN.
- 6.5 We consider the Site represents an appropriate location for residential development, which has been shown to be suitable for release from the Green Belt under a localised Green Belt review. Furthermore, "exceptional circumstances" exist to allow amendment to the Green Belt boundary through the Local Plan process. Development of the Site would form a logical extension to the under construction St Andrews Park, while maintaining separation between Halling and North Halling.

APPENDIX 1

North Field, Halling Site Location Plan



NOTES

Permission is granted to scale from this drawing for the purpose of Local Authority Planning Approval only. In all other circumstances DO NOT scale from this drawing, please contact this office for any additional information required.

Contractors, Sub Contractors and Suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.

Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

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REV	DESCRIPTION	DATE	AUTHOR	CHK'D
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KEY

Site boundary

Land also owned by applicant

Location of residential development

Site access

Proposed planting

Existing trees

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PROJECT

Former Cemex Site - North Field

Halling, Kent

For: Redrow Homes South East

DRAWING

Location Plan - 01

SCALE	DATE	AUTHOR	CHK'D
1:1250 @ A2	02/04/14	RB/AW	RB

JOB NO.	DRAWING NO.	REV
REDR131007	LP-01	-

APPENDIX 2

Representations to Medway Local Plan Issues & Options (Barton Willmore, February 2016)

Representations to Medway Council Local Plan

Issues & Options 2012 – 2035 Consultation Document

SUBMITTED ON BEHALF OF
REDROW HOMES (SOUTH EAST)

February 2016

REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN

ISSUES & OPTIONS

2012 – 2035

CONSULTATION DOCUMENT

**SUBMITTED ON BEHALF OF
REDROW HOMES (SOUTH EAST)**

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Prepared by:	Hardeep Hunjan
Checked by:	Andrew Wilford
Authorised by:	Andrew Wilford

Barton Willmore LLP
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

Ref: 23486/A5/HH/AW/kf/mg
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APPENDICES

Appendix 1:	North Field, Halling Site Location Plan
Appendix 2:	Objective Assessment of Housing Need: Critical Review (Barton Willmore, February 2016)
Appendix 3:	Barton Willmore The North Field, Halling: Landscape Appraisal and Green Belt Review (Barton Willmore, February 2016)

1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Redrow Homes (South East) in response to Medway Council's Local Plan Issues and Options 2012 – 2035 Consultation Document (MCIOCD) published in January 2016. As a landowner within Medway, Redrow Homes has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 1.2 These representations focus on promoting Redrow Homes' site known as 'The North Field, Halling' (The Site). A Site Location Plan is included at **Appendix 1**.
- 1.3 The Site forms part of the wider St. Andrew's Park Development which is currently being built out by Redrow Homes (hybrid planning application reference: MC/12/1791) for 385 dwellings and associated mix of uses. The Site currently lies within the Green Belt.
- 1.4 The Site is identified in the Medway SLAA 2015 (site reference 352) with the potential to deliver up to 50 dwellings. The Site comprises 6.84ha and is bound by residential development to the north, west and south. The A228 runs directly to the east of the site.
- 1.5 The Site itself is currently an unmanaged, sloping field with land rising from east to west, comprising a block of woodland in the southern corner adjoining the A228 and an area of scrub/woodland to the south-western corner adjoining Pilgrims Way/Road. A low voltage (33kv) overhead powerline crosses from west to east on the southern edge of the Site.
- 1.6 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework [NPPF] (March 2012), National Planning Practice Guidance [NPPG] (March 2014), the Consultation on Proposed Changes to National Planning Policy [CPCNPP] (December 2015) and The Rural Productivity Plan [RPP] (August 2015).
- 1.7 The MCIOCD advises that the current consultation is in advance of the preparation of a new Local Plan, and therefore is not a formal Regulation stage under the Town and Country Planning (Local Planning) Regulation 2012 ('the Local Planning Regulations'). The Local Development Scheme 2015 – 2018 (November 2015) anticipates that a "Preferred Options" consultation will be undertaken in January to February 2017, forming the first formal stage in the Local Plan's preparation (under Regulation 18 of the Local Plan Regulations).

- 1.8 Whilst the consultation is welcomed, it should be recognised that the MCIOCD does not contain any detailed policies or identify specific development sites (excluding reference to the unknown outcome of Lodge Hill) that can be assessed, and therefore due to the “broad” nature of the questions posed, the benefit of the consultation responses to MC will be limited in this regard.
- 1.9 In addition, the MCIOCD has not been accompanied by a suite of Evidence base documents that should inform the production of a new Local Plan. Indeed, the Strategic Housing and Economic Needs Assessment (SHENA) was not made publicly available until 19 February 2016, i.e. 6-weeks from the start of the consultation period, and 1 week from its close.
- 1.10 These representations focus on relevant matters and/or specific questions relating to the release of the Site for residential dwellings and address the following chapters:
- Housing (MCIOCD Questions 4 – 14);
 - Environment (MCIOCD Questions 30 - 32);
 - Rural Issues (MCIOCD Questions 38 – 42)
 - Deliverability (MCIOCD Questions 76 - 79);
 - Development Strategy (MCIOCD Questions 80 – 87).
- 1.11 We recognise that this consultation document is at the early stages of the Local Plan preparation and therefore further evidence and consultation will provide for greater clarity on a number of areas.
- 1.12 Alongside the Consultation Document, Medway Council has prepared a number of supporting Evidence Base documents. We do not seek to assess each one in detail, but draw upon:
- North Kent SHENA (March 2016)
 - The SLAA (November 2015)
 - Authority Monitoring Report (December 2015) which sets out how MC will fulfil its ‘Duty to Co-operate with neighbouring LPAs and Public Bodies.
 - North Kent SHMA (November 2015)

i) Barton Willmore Supporting Evidence

- 1.13 In addition to commenting on specific questions, these representations are supported by technical reports that demonstrate that the release of the Site from the Green Belt is appropriate and that there is a requirement to undertake a Green Belt review in order to meet the full OAN housing target.

- 1.14 Barton Willmore Research has undertaken a critique of the published SHENA entitled *Objectively Assessed Housing Need Medway Unitary Authority* (included at **Appendix 2**). It is a standalone document and assesses the housing requirements put forward within the MCIOCD and determines the soundness of the objectively assessed needs within Medway.
- 1.15 Barton Willmore Landscape Planning and Design has prepared a *Landscape Appraisal and Green Belt Review* (included at **Appendix 3**). The Report provides a Landscape and Visual Appraisal of the Site and assess the Site's contribution to the purposes of the Green Belt, in-line with National and Local planning policy.
- 1.16 The supporting Reports demonstrate that there are concerns with the identified OAN housing target and that a higher housing figure should be pursued as at present it is considered that this is unsound. In any event, there is a need for a Green Belt review (notwithstanding the required uplift) and the supporting information demonstrates that the Site is appropriate to be released as part of a small scale Green Belt review in this location.
- 1.17 The release of the Site will provide housing to be delivered in this rural part of Medway and sit alongside recently constructed development that will complement the St. Andrew's Park development and contribute to the character of Medway in this location.

2.0 NATIONAL PLANNING POLICY

i) National Policy & Plan Making

2.1 The NPPF (March 2012) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:-

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

(Para. 8)

2.2 The presumption in favour of sustainable development, as set out in the NPPF should be seen as a golden thread, running through both plan-making and decision-taking. For plan-making this means that:

- Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted.

(Para. 14).

2.3 LPAs should 'submit a plan for examination which it considers is "sound" – namely that 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 NPPF.
(Para. 182).

2.4 The NPPF considers that Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified. (Para. 157).

- 2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. (Para. 158).

ii) National Policy & Housing Need

- 2.6 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, 'Objectively Assessed Needs' (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.
- 2.7 LPAs should plan for a housing mix which takes into account "housing demand and the scale of housing supply necessary to meet this demand." Household and population projections should also be a key consideration, taking into account of migration and demographic change. (Para. 159).
- 2.8 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

(Reference ID: 2a-015-20140306)

- 2.9 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

(Reference ID: 2a-015-20140306)

- 2.10 The Consultation on Proposed Changes to National Planning Policy (CPCNPP) (December, 2015) reaffirms the Government's commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.

iii) Duty to Co-operate

- 2.11 The 'Duty to Co-operate' between LPAs is a clear requirement of National planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in para. 156. (Para. 178).
- 2.12 In addition, para. 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged. (Para. 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-operate during the plan-making process. (Para. 181).

iv) Government guidance on Green Belt

- 2.13 In September 2012, the Communities Secretary of State issued a Ministerial Statement covering housing and growth. The Statement, amongst other matters, recognises the importance of protecting the Green Belt against urban sprawl whilst also acknowledging that LPAs can review local designations through plan-making, where appropriate to do so, to promote growth. The Statement notes that:

"We encourage councils to use the flexibilities set out in the National Planning Policy Framework to tailor the extent of Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered in reviewing or drawing up local plans, we will support councils to move quickly through the process by prioritising their Local Plan examinations... There is considerable previously developed land in many Green Belt areas, which could be put to more productive use. We encourage councils to make best use of this land, whilst protecting the openness of the Green Belt in line with the requirements in the National Planning Policy Framework."

- 2.14 The Government recognises that Green Belt reviews can support growth under local circumstances.

3.0 HOUSING

"Q.4 Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?"

- 3.1 We do not consider that the approach and conclusions derived from MCIOCD, assessing the housing needs calculated for Medway over the plan period have been appropriately assessed. We do not consider that the assessed housing need, as calculated by MC is "sound" and in line with National planning policy.
- 3.2 The NPPF directs LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of sites. (Para 159).
- 3.3 MC has jointly produced a North Kent SHENA (March 2015) with Gravesham Borough Council and a North Kent SHMA (November 2015).
- 3.4 The North Kent SHENA identifies the OAN for Medway as being 1,281 dwellings per annum (dpa) over the period 2012-2037 based on the result of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates. This level of housing need has been taken forward in MCIOCD to cover the period 2012-2035.
- 3.5 An assessment of MCs objectively assessed need housing figure has been carried out by Barton Willmore's Research Team and is included at **Appendix 2**.
- 3.6 The Report has been prepared in accordance with the requirements of the NPPF, to ensure that the Local Plan of each Local Planning Authority meets the full, objectively assessed needs for market and affordable housing in the housing market area.
- 3.7 In summary, the Report critiques the OAN of 1,281 dpa derived from MC and does not consider it to represent an accurate representation of the full OAN for Medway over the Plan period (2012 – 2035) for the following reasons:
 - There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dwellings per annum, 2012-2035;

- The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The North Kent SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are 'positively prepared' an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;
- The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very minimum projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;
- The North Kent SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The North Kent SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined above we believe to be inappropriate;
- The North Kent SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The North Kent SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The North Kent SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the North Kent SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The North Kent SHENA and MCIOCD identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the North Kent SHENA does not address the significant affordable housing need in Medway.

- 3.8 The MCIOCD identifies an OAN of 29,463 dwellings over the period 2012-2035. This figure is below the level of need identified by the CLG 2012-based household projections which identifies 30,429 dwellings over the same period. The PPG states that the CLG figure should be used as the 'starting point' estimate of need. The 'starting point' usually requires adjustment to address suppressed household formation and suppressed migration trends.
- 3.9 In addition, the CPCNPP indicates that CLG are intending to amend National planning policy to ensure appropriate action is taken where there is a significant shortfall between the homes provided for in Local Plans and the houses being constructed. A housing delivery test is proposed (as outlined in the Spending Review and Autumn Statement 2015) (HM Treasury, November 2015). It is envisaged that this approach would compare the number of homes that LPAs set out to deliver in their Local Plan against the net additions in housing supply within the LPA area. Consequently, LPAs shall have to ensure that OAN figures are suitably robust and achievable in line with current National planning policy and the emphasis that is being placed on delivery rates with the CPCNPP. (Para. 30).
- 3.10 The CPCNPP considers that continued significant under-delivery of housing, identified over a sustained period should be addressed by appropriate action. The CPCNPP considers that one approach to address under-delivery rates could be to identify additional sustainable sites if it has been shown that the existing approach is not delivering the housing required. Such sites would need to be in sustainable locations, with appropriate infrastructure available and which can be demonstrated as deliverable. To deliver such an approach, it is recognised that collaboration between developers and local communities, undertaking appropriate consultations would be required to undertake policy reviews, enabling additional land in sustainable locations to come forward. (Paras. 31 – 33).
- 3.11 Overall, it is considered that the MCIOCD does not seek to meet the Full OAN for Medway which is considered to be in the region of **1,489dpa**. This matter should be addressed in the next iteration of the Local Plan as the current position is considered to be unsound.

"Q.5 What do you consider to be the appropriate housing market area for Medway?"

- 3.12 The SHMA (November 2015) defines the Housing Market Area to comprise Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling.
- 3.13 MC should seek to work collaboratively under the 'Duty to Co-operate' to address the housing needs of neighbouring authorities and how housing can be delivered in part of the HMA that are influenced by neighbouring Districts.

"Q.6 Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?"

- 3.14 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012 – 2037), the Local Plan period (2012 – 2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744dpa), which would constitute 58% of MC's identified OAN figure of 1,281dpa. The PPG advises that an increase in the total Local Plan housing figure should be considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).
- 3.15 The need for affordable housing nevertheless, should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."* (Para. 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing when taking account of the normal cost of development and mitigation, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 3.16 We would consider that in light of the highlighted need for affordable housing provision as identified in the North Kent SHMA (November 2015), seeking the provision of up to 25% affordable housing is appropriate.

Q.7 – 14 – No comments

4.0 RURAL ISSUES

Q. 38 -39 – No comment.

"Q.40 How should the Local Plan address the need to maintain and improve access to services in rural areas?"

- 4.1 It is acknowledged that rural areas face a number of challenges including accessibility to services. We consider that new development within rural areas should provide some form of contribution to maintaining and improving rural areas, where appropriate. The LPA should identify services in rural areas that are in need of improvement in order to facilitate future development needs.

"Q.41 What consideration should be given to strategic infrastructure and development in rural Medway?"

- 4.2 The PPG recognises that *"A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities."* (Reference ID: 50-001-20140306)
- 4.3 Improving strategic infrastructure and development in rural Medway is considered to be vital to support sustainable rural communities. Development in rural areas faces a number of barriers which are either unique to rural locations or experienced to a greater extent than development in other areas of Kent and Medway. Emerging local planning policy should ensure that the ongoing viability of rural areas is maintained with the provision of sufficient infrastructure including public transport and educational facilities to support future growth.
- 4.4 We consider that MC should work closely with key stakeholders to develop appropriate policy to support the vitality of rural areas.
- 4.5 The Department for Environment Food & Rural Affairs published The Rural Productivity Plan (RPP) in August 2015. Amongst other matters, it highlights the Government's intention to provide more housing in rural areas. The Plan notes that *"through the right combination of measures, the government wants to ensure that any village in England has the freedom to expand in an incremental way, subject to local agreement."* (Pg 6)

- 4.6 This indicates that strong local policy support for the location of new development and related infrastructure should be provided in line with Government guidance and within the context of the identified local requirement.

"Q 42 How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?"

- 4.7 Delivery of new homes within rural areas of Kent and Medway presents a further challenge. Historically, assessment of housing need in rural areas has been identified by MC as a key issue and MC has previously identified localised needs through parish Housing Need Surveys, undertaken by the Kent rural housing enabler. Where local needs are identified, this leads to a process of identifying land to deliver affordable rural housing. But there are significant issues with delivery and the costs involved tend to be higher than development in other areas.
- 4.8 The Site, in conjunction with the development at St. Andrew's Park, would offer a mix of uses, supporting the residential development on the Site and benefiting the wider area. Furthermore, the St. Andrew's development will provide a range of community infrastructure facilities, supporting a thriving rural community. The development would also serve to meet the needs of other housing market areas, supporting MCs 'duty to co-operate' with neighbouring LPAs.
- 4.9 The RPP states that *"the government will make it easier for villages to establish neighbourhood plans and allocate land for new homes, including the use of rural exception sites to deliver Starter Homes."* (Para. 8)
- 4.10 In February 2016, Government issued a Rural Planning Review: Call for Evidence (RPRCFE) following on from the RPP. It recognises the importance of ensuring the sustainability of rural areas and sets out to investigate evidence in practice regarding the effectiveness of the current planning system for businesses in the rural context.
- 4.11 Both the RPP and RPRCFE set out the Government's intention to promote sustainable growth and ensure the viability of rural areas.

5.0 DELIVERABILITY

Q.76, 78 – 79 – No comment

"Q.77 Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?"

- 5.1 We consider that it is appropriate to set different rates of affordable housing and CIL contributions to take into account differing viability between areas of Medway.
- 5.2 The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."* (Para. 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing when taking account of the normal cost of development and mitigation, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

6.0 DEVELOPMENT STRATEGY – OVERARCHING

Q.80, 83, 85 – 87 – No comment.

"Q.81 Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?"

- 6.1 We consider that a range of development types, as outlined within MCIOCD should be utilised in meeting Medway's growth requirements. This should be based on an overarching vision of sustainable development, as underpinned by National and Local planning policy. When selecting development types, it is important to consider the aspirations of National and Local policy.
- 6.2 The NPPF encourages LPAs in plan-making to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Whilst planning for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, LPAs should identify the range of housing that is required in particular locations. (Para. 50).
- 6.3 Furthermore, we refer to our Clients Site located in Halling, which is classified as a rural area within the settlement hierarchy. National policy supports sustainable development in rural areas, encouraging housing to be located where it will enhance or maintain the vitality of rural communities. Additionally, the NPPF directs that LPAs should be responsive to local circumstances and plan housing development to reflect local needs. (Para. 54 - 55).
- 6.4 The CPCNPP considers that *"building new homes on small sites, whether in rural or urban locations, can deliver a range of economic and social benefits."* Amongst other matters, this includes creating local jobs and sustaining local growth, particularly in rural areas and making effective use of developable land. (Para. 23).

7.0 DEVELOPMENT STRATEGY – GREEN BELT REVIEW

"Q.84 Should the green belt boundary be reviewed?"

- 7.1 We would support a review of the Green Belt boundary to assess the development potential of land that does not meet the five purposes of the Green Belt as set out in the NPPF. This is especially in the light of the required housing numbers.
- 7.2 The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. There are five key purposes of the Green Belt, including: -
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- (Paras 79-80)
- 7.3 The NPPF considers that LPAs with Green Belts in their area should establish Green Belt boundaries in their Local Plans, setting the framework for Green Belt and settlement policy. It is recognised that Green Belt boundaries that have been established should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. LPAs should take a long term view of the permanence of Green Belt boundaries beyond the plan period.
- 7.4 The NPPF states that LPAs should take into account the need to promote sustainable patterns of development when reviewing Green Belt boundaries. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Inappropriate development within the Green Belt is considered harmful and should not be approved except in very special circumstances. This includes the construction of buildings unless they meet certain criteria which do not have a harmful impact on the openness of the Green Belt. (Paras. 79 - 92)

- 7.5 As previously stated, our Client is promoting the release of the Site from the Green Belt with the potential to develop the southern section of the Site for residential development (as shown on **Appendix 1**). It is intended that a 'green wedge' could be created to the northern section, maintaining a separation between the settlement boundaries of Halling and North Halling. A Landscape Appraisal and Green Belt Review has been carried out by Barton Willmore's Landscape Team and is included at **Appendix 3**. The Report provides a Landscape and Visual Appraisal of the Site to assess the Site's contribution to the purposes of the Green Belt, in-line with National and Local planning policy.
- 7.6 The Site is set within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is bounded by residential properties to the north, west and south, with Formby Road located adjacent to the east of the Site. It is acknowledged that the Site is within the Green Belt, however, it is not subject to any other landscape-related or planning policy designations.
- 7.7 A small localised release of Green Belt land is proposed and allocation for residential development on part of the Site.
- 7.8 A Visual Appraisal of the Site was undertaken which demonstrates that the Site is *"partially visible from its immediate surroundings, however, views are typically filtered by intervening vegetation. More open views into the Site are obtained from land to the east of the River Medway, however, where these views are obtained, the Site is seen in an urbanised context of the lower slopes of the Medway Valley, beyond which land rises to form a predominantly wooded backdrop to the views."* (Para. 8.6).
- 7.9 The review of the Green Belt functions of the Site, as set out in the NPPF, indicates that *"the Site makes **no contribution** to checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns; makes a **limited contribution** to assisting in safeguarding the countryside from encroachment; and **would not prejudice** derelict land coming forward in future for development."* (Para. 8.8). In this case, we would consider that a localised review of the Green Belt is wholly justified bearing in mind the analysis of the merits of Green Belt functions as set out in the NPPF.
- 7.10 The Report concludes that releasing land from the Green Belt in this area would not cause any significant harm to Green Belt purposes and serve to rationalise the Green Belt boundary. Furthermore, by undertaking a Landscape and Visual Appraisal of the Site, the Report concludes that sympathetic development within the Site would be acceptable in landscape and visual terms and would result in limited to no effect on the function of the Green Belt.

8.0 OPEN SPACE

Q.49 -52, 53 – No comment.

"Q.52 Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?"

- 8.1 We consider that open space provision for new development should take a balance between the two approaches. The provision of on-site open space should be considered within the context of each development site, assessing the potential feasibility of a development site to provide for on-site open space provision or whether contributions towards maintaining and enhancing the existing estate is deemed more appropriate.

9.0 ENVIRONMENT

"Q.30 What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?"

- 9.1 We would consider that one of the ways in which MC could strike a balance between securing and strengthening Medway's environment and addressing the area's development needs would be to review those areas of land within Medway that do not serve the functions of the Green Belt as outlined with the NPPF (para. 80) and that do not have a detrimental impact on the environment.
- 9.2 This would prioritise sustainable development on appropriate land throughout Medway and can include Green Belt land as this may have benefits over other environmentally sensitive designations.
- 9.3 In this instance, a localised review of the Green Belt for the Site is considered to fulfil this sustainability credential.

Q.31 – 32 – No comment

10.0 SITE SUITABILITY

10.1 The Site was put forward to MC's 'call for sites' Strategic Land Availability Assessment in May 2014. The SLAA sets out to identify sites with development potential and the methodology undertaken enabled MC to carry out Stage 1 (Site Identification) and Stage 2 (Site Assessment) of the Planning Policy Guidance methodology. As part of the Stage 1 process, a number of sites were excluded for further assessment if they were constrained by a range of restrictive designations as identified within the NPPF (Footnote 9). This included sites within the Green Belt, resulting in North Field, Halling being one such site which was excluded and deemed unsuitable for development due to its Green Belt designation.

10.2 The SLAA recognises that;

"given the scale of development needs that Council must accommodate over the Plan Period, it was considered appropriate and robust that Green Belt land should be subject to detailed assessment at stage 2. However, whilst Green Belt land has been assessed at stage 2, this does not comprise a Green Belt Review. The Council intends to undertake a Green Belt review separately as part of the Local Plan evidence base; this will specifically consider whether land performs Green Belt functions and meets Green Belt purposes, rather than simply whether a site is suitable for development." (2015;13)

10.3 We would consider it appropriate that when such a review of the Green Belt is undertaken to meet OAN requirements, the SLAA would be updated to reflect this changing circumstance.

10.4 We consider that the Site is suitable for localised Green Belt release and demonstrates potential for development. Currently, the whole Site lies within designated Green Belt land and we consider that a robust case has been made to release the Site from the Green Belt, creating a logical extension of St Andrews Park as well as establishing a green wedge between the settlements, maintaining their separation.

10.5 The Site is located within a sustainable location, adjacent to the St. Andrew's Park development which will deliver a range of infrastructure and services. The Site is accessible, located adjacent to the local road network with access proposed directly onto the A228 and also served by local bus routes. Furthermore, the Site is located in close proximity to the strategic highway network and railway with the M2 located approximately 1 mile to the north of the Site and Halling railway station approximately 850 metres to the south of the Site. Pedestrian access to the railway station will be via the pedestrian footbridge, delivered as part of the St. Andrew's Park development.

- 10.6 The development would meet the three elements of sustainable development, as set out in the NPPF (para 7). Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has deliverable potential to contribute towards much needed housing within rural Medway and would deliver a mix of housing types, including an element of affordable housing.
- 10.7 The proposed provision of a green wedge to the northern part of the Site would enable further ecological enhancements, as well as landscaping delivered in line with potential development of the Site.
- 10.8 The Site is considered 'deliverable' in that it meets the requirements of footnote 11 of the NPPF and it has been demonstrated that the Site currently available for development, will offer a suitable location for development and has a realistic prospect of housing being delivered on the Site within five years and that development of the Site is viable.

11.0 CONCLUSIONS

- 11.1 These representations are submitted on behalf of Redrow Homes who has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 11.2 These representations focus on promoting Redrow Homes' site known as 'The North Field, Halling'. The Site forms part of the wider St. Andrew's Park Development which is currently being built out by Redrow Homes. The Site currently lies within the Green Belt.
- 11.3 The representations are supported by technical reports in respect of Objectively Assessed Needs and a Green Belt review.
- 11.4 We do not consider that the OAN target of 1,281dpa is sound. It falls short of the starting point estimate and once other factors are taken into consideration, could be as high as 1,489dpa. This matter should be addressed during the next iteration of the Local Plan and ensure that there are sufficient housing sites allocated to meet the Full OAN.
- 11.5 We consider the site is suitable to be released from the Green Belt under a localised Green Belt review in this location. It would form a logical extension to the under construction St Andrews Park and would maintain separation between Halling and North Halling. Furthermore, development in this location would serve to deliver houses in this rural part of Medway that has other Housing Market Area influences upon it (from Tonbridge and Malling and Maidstone).
- 11.6 In addition to the above, we have responded to specific questions. A summary of responses is set out in Table 11.1 below.

Table 11.1 Summary of Responses to Specific Questions.

Housing	
<i>"Q.4 Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?"</i>	We do not agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period and consider that this has not been appropriately assessed. This is based on the conclusions derived from the BW report which indicates that the OAN of 1,281 dpa derived from MC is not considered to represent an accurate representation of the full OAN for Medway over the Plan period (2012 – 2035).

<p><i>"Q.5 What do you consider to be the appropriate housing market area for Medway?"</i></p>	<p>We do not outline specific housing market areas for Medway that would be considered appropriate but instead wish to highlight that rural parts of Medway (including the Site) have an influence on other housing market areas such as Tonbridge & Malling and Maidstone and therefore these housing market needs should be suitably addressed under the 'duty to co-operate'.</p>
<p><i>"Q.6 Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?"</i></p>	<p>We would consider that in light of the highlighted need for affordable housing provision that the suggested provision of affordable housing (25%) is appropriate.</p>
<p><i>Environment</i></p>	
<p><i>"Q.30 What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?"</i></p>	<p>We would consider that one of the ways in which MC would strike a balance between securing and strengthening Medway's environment and addressing the area's development needs would be to review those areas of land within Medway that do not serve the functions of the Green Belt as outlined in the NPPF and do not have a detrimental impact on the environment.</p>
<p><i>Rural Issues</i></p>	
<p><i>"Q.40 How should the Local Plan address the need to maintain and improve access to services in rural areas?"</i></p>	<p>We consider that the Local Plan should specifically address the need to maintain and improve access to services in rural areas and identify such services to support the continued viability of such areas. Contributions to address such identified need, where appropriate, should be sought from development.</p>
<p><i>"Q.41 What consideration should be given to strategic infrastructure and development in rural Medway?"</i></p>	<p>We consider that the need for strategic infrastructure and development should be appropriately assessed in relation to local needs. Emerging local planning policy should ensure that the ongoing viability of rural areas is maintained.</p>

<i>"Q 42 How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?"</i>	We consider that MC should work closely with key stakeholders, including Neighbourhood Plan creating bodies to develop appropriate policy to support the vitality of rural areas.
<i>Open Space</i>	
<i>"Q.52 Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?"</i>	We consider that open space provision should take a balance between the two approaches, based on individual site context.
<i>Deliverability</i>	
<i>"Q.77 Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?"</i>	We consider that it is appropriate to set different rates of affordable housing and CIL contributions to take into account differing viability areas within Medway.
<i>Development Strategy</i>	
<i>"Q.81 Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?"</i>	We consider that a range of development types should be utilised in meeting Medway's growth requirements, based on the local context.
<i>"Q.84 Should the green belt boundary be reviewed?"</i>	We would support a review of the Green Belt boundary to assess the development potential of land that does not meet the five purposes of the Green Belt as set out in the NPPF, especially in the light of meeting increased housing numbers.

- 11.6 In the light of the above, we consider that the Site represents a suitable location for future allocation that has been appropriately tested and subjected to a Green Belt review as the Local Plan advances.

Appendix 1

North Field, Halling Site Location Plan



A2

N

0

50m

100m

(1:1250)

NOTES

Permission is granted to scale from this drawing for the purpose of Local Authority Planning Approval only. In all other circumstances DO NOT scale from this drawing, please contact this office for any additional information required.
Contractors, Sub Contractors and Suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.
Where applicable this drawing is to be read in conjunction with the Consultants' drawings.
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REV	DESCRIPTION	DATE	AUTHOR	CHK'D
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KEY

Site boundary

Land also owned by applicant

Location of residential development

Site access

Proposed planting

Existing trees

TETLOW KING®

ARCHITECTS : URBAN DESIGNERS : SUSTAINABILITY CONSULTANTS

Building 300, The Grange, Romsey Road, Michelmersh, Romsey, Hampshire, SO51 0AE
Tel: 01794 517333 Fax: 01794 515517 Web: www.tetlowking.co.uk

PROJECT

Former Cemex Site - North Field
Halling, Kent
For: Redrow Homes South East

DRAWING

Location Plan - 01

SCALE	DATE	AUTHOR	CHK'D
1:1250 @ A2	02/04/14	RB/AW	RB

JOB NO.	DRAWING NO.	REV
REDR131007	LP-01	-

Appendix 2

Objective Assessment of Housing Need: Critical Review (Barton Willmore, February 2016)

MEDWAY COUNCIL

OBJECTIVE ASSESSMENT OF HOUSING
NEED

CRITICAL REVIEW

Prepared on behalf of Redrow Homes (South East)

February 2016

MEDWAY COUNCIL
OBJECTIVE ASSESSMENT OF HOUSING NEED
CRITICAL REVIEW
Prepared on behalf of Redrow Homes (South East)
February 2016

Project Ref:	23486/A5/DU/DM
Status:	Final
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Prepared by:	DM DU
Checked by:	DU DM
Authorised by:	AW

Barton Willmore LLP
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

Tel:
Fax:
Email:

Ref: 23486/A5/DU/DM/kf
Date: 29 February 2016

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1.0 INTRODUCTION

- 1.1 This Technical Note has been prepared by Barton Willmore on behalf of Redrow Homes (South East), in order to review the Objectively Assessed Housing Need (OAN) determined for Medway Council as set out in the Council's Strategic Housing and Economic Needs Assessment (SHENA). The SHENA has been prepared in partnership with Gravesham Borough Council, however in this review we focus on the OAN for Medway only.
- 1.2 The review presented here has been undertaken in the context of the policies of the National Planning Policy Framework (NPPF) and the supporting Planning Practice Guidance (PPG) requirements that a full, unconstrained OAN is prepared.
- 1.3 The review is structured as follows:

Section 2 provides an outline of the relevant National Planning Policy Framework (NPPF), the supporting Planning Practice Guidance (PPG), and Local Planning Policy.

Section 3 reviews the latest official demographic evidence for Medway, including:

- Latest ONS population and CLG household projections;
- ONS mid-year population estimates and past migration trends.

Section 4 provides a review of the SHENA in the context of the requirements of PPG's Housing and Economic Development Needs Assessment guidance (ID2a).

Section 5 summarises our critique of the SHENA to recommend an appropriate way forward in assessing overall housing need for Medway.

2.0 PLANNING POLICY CONTEXT

A) NATIONAL PLANNING POLICY

i) Introduction

- 2.1 The National Planning Policy Framework (NPPF, 27 March 2012) and the accompanying Planning Practice Guidance (PPG, 06 March 2014) set out the requirements within which local planning authorities should be setting their overall housing targets as part of a full objective assessment of overall need. These requirements are summarised below.

ii) National Planning Policy Framework (27 March 2012)

- 2.2 NPPF sets out the Government's planning policies for England and how these are expected to be applied. NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the Country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).
- 2.3 In respect of delivering a wide choice of high quality homes, NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).
- 2.4 Furthermore, it states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (paragraph 50).
- 2.5 With regard to plan-making, local planning authorities are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156).
- 2.6 NPPF states that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework (paragraph 157).
- 2.7 Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of and strategies for housing and employment uses, taking full account of relevant market and economic signals (paragraph 158).

- 2.8 For plan-making purposes, local planning authorities are required to clearly understand housing needs in their area. To do so they should:

“prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries; The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

meets household and population projections, taking account of migration and demographic change;

addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).”¹

iii) Planning Practice Guidance (PPG, 06 March 2014)

- 2.9 PPG was issued as a web based resource on 6th March 2014. Guidance on the assessment of housing development needs (PPG ID: 2a) includes the SHMA requirement set out in NPPF and supersedes all previous published SHMA practice guidance (CLG, 2007).
- 2.10 The primary objective of the housing development needs assessment (the SHMA) is to identify the future quantity of housing needed, including a breakdown by type, tenure and need (PPG ID2a 002)
- 2.11 Housing need refers to the scale of housing likely to be needed in the housing market area over the plan period, should cater for the housing demand in the area and identify the scale of housing supply necessary to meet that demand. (PPG ID2a 003)
- 2.12 The assessment of need is an objective assessment based on facts and unbiased evidence and constraints should not be applied (PPG ID2a 004).
- 2.13 Use of the PPG methodology for assessing housing need is strongly recommended, to ensure that the assessment is transparent (ID2a 005). The area assessed should be the housing market area (ID2a 008), reflecting the key functional linkages between places where people live and work (ID2a 010).

¹ Paragraph 159, National Planning Policy Framework, 27 March 2012;

PPG methodology for assessing housing need

- 2.14 The full methodology is set out at ID 2a 014 to 029 (overall housing need at ID2a 015 to 020), and is introduced as an assessment that should be based predominately on secondary data (ID2a 014).

Starting point estimate of need

- 2.15 The methodology states that the starting point for assessing overall housing need should be the household projections published by the Department for Communities and Local Government, but that they are trends based and may require adjustment to reflect factors, such as unmet or suppressed need, not captured in past trends (ID2a 015).

"The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing." (2a-015) (Our emphasis)

Adjusting for demographic evidence

- 2.16 The PPG methodology advises that plan makers may consider testing alternative assumptions in relation to the underlying demographic projections and household formation rates. It also states that 'account should be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates' (2a-017).

Adjusting for likely change in job numbers

- 2.17 In addition to taking into account demographic evidence the methodology states that job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).

"Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns ... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems." (2a-018)

- 2.18 The PPG also confirms the importance of ensuring sufficient growth in the working age population (16-64), at paragraph 2a-018 and 2a-21:

“Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area.” (2a-018)

“When considering future need for different types of housing, plan makers will need to consider whether they plan to attract a different age profile e.g. increasing the number of working age people.” (2a-021)

Adjusting for market signals

- 2.19 The final part of the methodology regarding overall housing need is concerned with market signals and their implications for housing supply (2a-019:020).

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.” (2a-019)

- 2.20 Assessment of market signals is a further test intended to inform whether the starting point estimate of overall housing need (the household projections) should be adjusted upwards. Particular attention is given to the issue of affordability (2a-020).

“The more significant the affordability constraints ... and the stronger other indicators of high demand ... the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be.” (2a-020)

Overall housing need

- 2.21 An objective assessment of overall housing need can be summarised as a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b) the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.

- 2.22 The extent of any adjustment should be based on the extent to which it passes each test. That is:

- It will at least equal the housing need number implied by the latest demographic evidence,
- It will at least accommodate projected job demand; and,
- On reasonable assumptions, it could be expected to improve affordability.

Affordable housing need assessment

- 2.23 The methodology for assessing affordable housing need is set out at 2a-022 to 029 and is largely unchanged from the methodology it supersedes (SHMA 2007). In summary, total affordable need is estimated by subtracting total available stock from total gross need. Whilst it has no bearing on the assessment of overall housing need, delivering the required number of affordable homes can be used to justify an increase in planned housing supply (2a-029).

"The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments ... An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes." (2a-029) (our emphasis)

B) LOCAL PLANNING POLICY**i) Medway Council Local Plan – Issues and Options 2012-2035 (January 2016)**

- 2.24 The Medway Council Local Plan Issues and Options Plan (draft Plan) represents the first formal stage of the Local Plan process, and sets out a strategy for development in Medway up to 2035.
- 2.25 In respect of the OAN for Medway, the Plan states the following:

"The Government requires Local Planning Authorities to determine the objectively assessed needs (OAN) for housing in their strategic housing market areas. Work carried out for the North Kent Strategic Housing and Economic Needs Assessment (SHENA) in 2015 has analysed demographic, economic and market signal information to assess the quantity and types of housing that will be needed to meet the projected growth in households over the plan period. This concludes that the Local Plan needs to make provision for up to 29,463 new homes by 2035."²

- 2.26 The OAN determined by the Strategic Housing and Economic Needs Assessment (SHENA) equates to 1,281 dwellings per annum over the period 2012-2037, not the plan period (2012-2035). The Plan states how the Council is committed to planning positively to meet the development needs of Medway.
- 2.27 The study Barton Willmore presents here provides a full critique of the SHENA to evaluate whether the OAN is positively prepared in line with the requirement of the NPPF.

² Paragraph 7.8, page 21, Medway Council Issues and Options Consultation Document, January 2016

2.28 The Issues and Options Plan also identifies Medway as a major economic hub within the South East region and Medway's location within the Thames Gateway offers excellent opportunities to stimulate business growth.

2.29 A key issue for the Local Plan will be:

"To secure a successful economic base in Medway, providing a range of jobs for residents and securing sustainable growth without exacerbating the need to travel to access high quality job opportunities."³

2.30 Furthermore, the Issues and Options Plan outlines the scale of economic growth forecast for Medway as follows:

"To forecast the scale and nature of economic growth anticipated in Medway over the plan period, calculations have been carried out based on an assessment of the population growth projections, the strengths of the local economic, knowledge of growth sectors, and impacts of major strategic developments such as London Paramount. The research has forecast a growth of around 17,200 new jobs in Medway up to 2037. Over half of these jobs are expected in non-B class activities, such as retail and healthcare."⁴

C) SUMMARY

2.31 The NPPF and PPG requires that in planning for future levels of housing, local authorities should boost significantly the supply of housing in their area that meets in full, the objectively assessed need for market and affordable housing. In doing so local authorities should;

- identify a scale of housing that meets household and population projections;
- account for migration and demographic change in formulating housing requirements;
- ensure that assessment of, and strategies for, housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals; and
- work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing.

³ Paragraph 8.18, page 32, Medway Council Issues and Options Consultation Document, January 2016

⁴ Paragraph 8.19, page 32, Medway Council Issues and Options Consultation Document, January 2016

- 2.32 The following sections of this report provide an analysis of the starting point in objectively assessing overall housing need according to PPG – official ONS and CLG projections and estimates – and a full review of the SHENA and the OAN it determines for Medway. This will enable us to reach a conclusion as to whether the SHENA provides for full OAN.

3.0 HOUSEHOLD DEMOGRAPHICS

- 3.1 The PPG advises that the starting point for estimating overall housing need should be the latest household projections produced by the Department for Communities and Local Government (CLG) and that account should be taken of the most recent demographic evidence, including Office for National Statistics (ONS) population estimates.
- 3.2 This section reviews the latest official ONS demographic and CLG household data for Medway. Comparisons are made alongside the South East region and the national average.
- 3.3 To align with the assessment of housing need in the Council's draft Plan and the SHENA, we provide our analysis in this section (where possible) based on the 23-year period 2012-2035.

i) Historic population growth – ONS Mid-Year Population Estimates

- 3.4 Medway is currently estimated to have a population of 274,000 according to the ONS 2014 Mid-Year Population Estimates. Since 2001 Medway's population has grown by 24,300 which is equivalent to a rate of 9.7%. Medway's rate of population growth is slightly lower than the national average (9.8%) and lower than the regional average (10.6%) as shown in Table 3.1.

Table 3.1: Historic population change (2001-2014)

	2001	2014	2001-2014 change	
			No.	%
Medway	249,700	274,000	24,300	9.7%
South East	8,023,400	8,873,800	850,400	10.6%
England	49,449,700	54,316,600	4,866,900	9.8%

Source: Mid-Year Population Estimates, Office for National Statistics

All figures have been individually rounded to the nearest one hundred and may not sum

Percentages have been calculated using unrounded numbers

- 3.5 Population changes as a result of net migration and natural change. Table 3.2 provides the detailed components of change for Medway.

Table 3.2: Components of population change – Medway

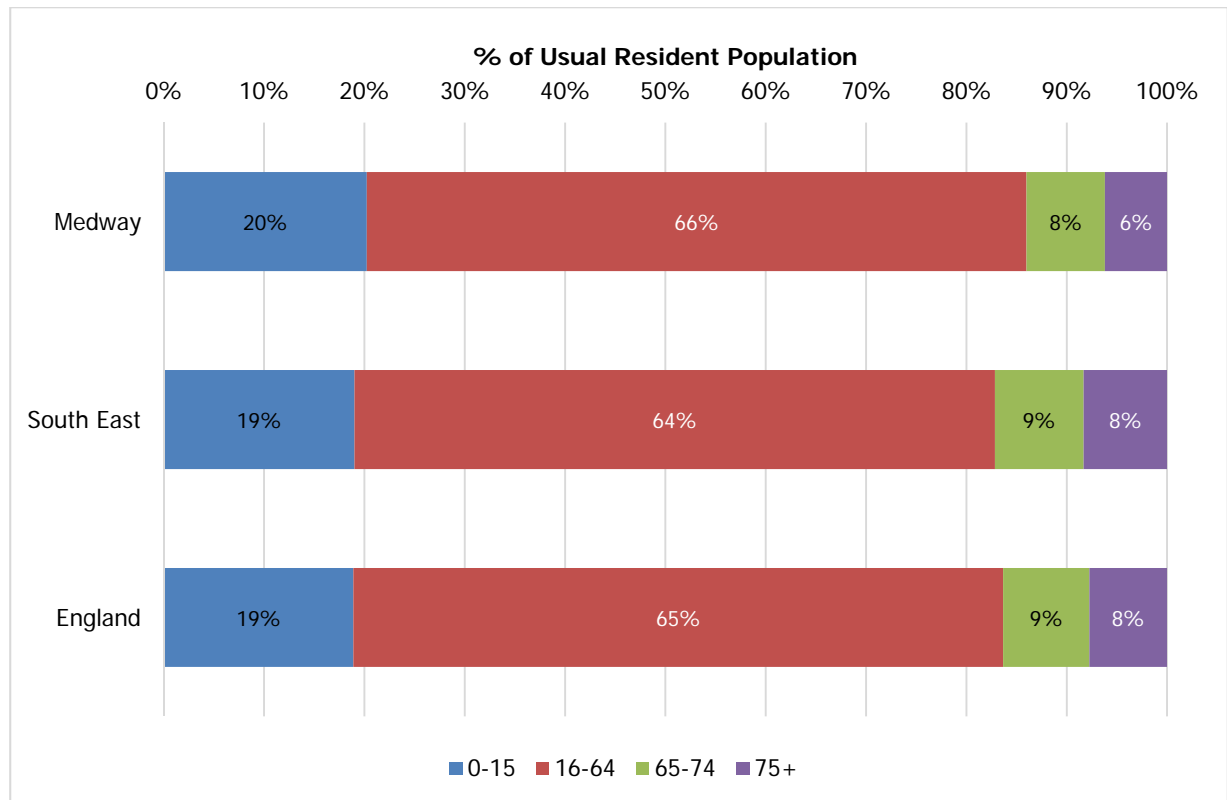
	Natural change	Net Migration	Other changes	Total change
2001/02	879	-250	-71	558
2002/03	1046	-270	121	897
2003/04	988	-782	94	300
2004/05	1,030	-691	300	639
2005/06	1,033	115	232	1,380
2006/07	1,247	969	130	2,346
2007/08	1,304	998	98	2,400
2008/09	1,383	374	249	2,006
2009/10	1,450	776	282	2,508
2010/11	1,539	652	-44	2,147
2011/12	1,546	1,793	-6	3,333
2012/13	1,452	1,280	155	2,887
2013/14	1,510	1,296	104	2,910
Average 2001/14	1,262	482	126	1,870
Average 2007/12	1,444	919	116	2,479
Average 2009/14	1,499	1,159	98	2,757
Average 2004/14	1,349	756	150	2,256

Source: Mid-Year Population Estimates, Office for National Statistics

- 3.6 At the start of the decade Medway experienced net outward migration. However, since 2005 net migration to Medway has been positive meaning that more people have moved to Medway than moved out.
- 3.7 Medway has also experienced positive natural change (more births than deaths) which has increased between 2001 and 2014. In addition there is positive 'other' change (change that is not possible to identify as either migration or natural change) equating to 1,640 people, or an average of 130 people per annum over the period 2001-2014.
- 3.8 Over the period 2001 and 2014, population change in Medway has largely been as a result of natural change (67%). However more recent trends reflect a shift in the components of population change as a result of net migration increasing considerably since 2011.

- 3.9 Medway has a younger age profile than the regional and national averages, with a larger proportion of the population aged 0-15 years and 16-64 years, as shown in Figure 3.1.

Figure 3.1: Age profile, 2011



Source: 2011 Census

ii) Office for National Statistics (ONS) population projections

- 3.10 The ONS produces population projections for all local authority areas in England. These are referred to as the Sub National Population Projections (SNPP) and are published by the ONS usually every two years.
- 3.11 The ONS SNPP are trend-based projections. That is, they project forward past demographic trends in births, deaths and migration. They do not take account of any future changes to government policy which may affect these past trends.
- 3.12 Table 3.3 sets out the official ONS SNPP in chronological order from the 2008-based series to the most recent 2012-based SNPP (29 May 2014). The 'interim' 2011-based SNPP and 2012-based SNPP take account of findings from the 2011 Census of the population. Growth is considered over the period 2012-2033 (2008-based) and 2012-2037 (2012-based). However, in line with the Medway Plan period, growth has also been considered over the period 2012-2035. The shorter period presented in respect of the 2008-based series is due to the projections finishing in 2033.

Table 3.3: ONS Population Projection series for Medway

Series	2012	2021	2033/35	2037		2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012-based	268,200	290,500	322,700*	326,800		22,300 (2,480)	54,500 (2,370)	58,600 (2,340)
2011-based (interim)	267,300	290,300				23,000 (2,560)		
2008-based	257,600	269,700	286,300**			12,100 (1,340)	28,700 (1,370)	

Source: Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding

*2035; **2033.

- 3.13 The latest 2012-based SNPP project significantly higher population growth than the previous full 25-year projection series (the 2008-based SNPP) and marginally higher growth than the interim 2011-based series. This is expected given the analysis presented earlier in this chapter which shows net migration to Medway increasing in recent years.
- 3.14 Despite the 2012-based SNPP projecting the highest population growth, it is important to note that the 2012-based SNPP are underpinned by trends captured over the 2007-2012 period. This period was characterised by an economic recession and for this reason, resulted in atypical migration trends in some areas.
- 3.15 From reference to the 2012-based ONS SNPP components of change, the 2012-based ONS SNPP is underpinned by average net in-migration of 840 people per annum, 2012-2035. However, analysis of net migration trends from the period 2007-2012 from which the 2012-based SNPP trends are drawn puts average net migration at 919 people per annum. This compares to the most recent long-term trend (2004/5-2013/14) of 760 people per annum and the most recent 5-year trend (2009/10-2013/14) of 1,160 people per annum.
- 3.16 The analysis of migration trends for Medway therefore suggests a short-term trend in Medway is a prudent base from which to plan. However, whilst the most recent 5-year migration trend suggests higher net migration to Medway (largely influenced by the three most recent years) than the 2012-based SNPP, it is not possible to say with any certainty whether Medway will see a continued rise in migration. On this basis, the 2012-based SNPP are considered to provide a reasonable demographic projection for Medway.
- 3.17 However, the 2012-based SNPP are considered to represent the very minimum of future population growth in Medway given the 2012-based SNPP are considered to be conservative due to the national projections which underpin them. The 2012-based SNPP are constrained to the 2012 National Projections published in 2013. The national projection is based on an

assumption of 165,000 net international migrants coming into the UK per annum, and this assumption is projected forward per annum over the full 25 years of the 2012-based SNPP period. However net international migration of 165,000 people per annum conflicts significantly with the latest migration statistics report by the ONS, which shows net international migration of 336,000 people in the year ending June 2015, over double the 2012-based SNPP assumption.

- 3.18 The ONS appear to have noted this significant increase in net international migration, recently publishing the 2014 National Projections and assuming 185,000 net international migrants per annum. However this remains significantly lower than has been seen in the recent past. Although the forthcoming 2014-based ONS SNPP (expected May 2016) will project higher population growth across the country on the basis of these revised 2014-based National Projections, the assumption of 185,000 net international migrants per annum remains a very conservative estimate on the basis of recently recorded trends.
- 3.19 In this context the 2012-based SNPP are considered to be underpinned by assumptions which lead to a minimum level of population growth over the Plan period (2012-2035). Therefore the projected population growth presented in Table 3.3 is very likely to be conservative given that Medway is historically a net receiver of international migrants.
- 3.20 It is important to be aware of the issues related to the SNPP because the CLG household projections underpinned by the 2012-based SNPP. The household projections are derived by applying household representative rates to the ONS population projections. Household projections will be discussed in the next section.
- 3.21 The 2012-based ONS SNPP project the working age population to grow at a much slower rate than the population as a whole as is shown in Table 3.4. Given the extension of State Pension Age, there will be an increasing number of people working beyond the age of 64 years and therefore it is also important to consider the projected growth of the 65-74 year old population.

Table 3.4: Working Age Population Change, 2012-2035

Age Group	Medway
16-64	18,050 (10.3%)
65-74	11,900 (53.5%)
Total (16-74 years)	29,950 (15.2%)
Total (all ages)	57,800 (21.8%)

Source: 2012-based SNPP, Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding. Percentages calculated using unrounded numbers.

- 3.22 It is evident from Table 3.4 that the growth in the working age population (16-74 years) in Medway is heavily driven by the growth in the population aged 65-74 years (53.5% growth). Realistic assumptions need to be applied as to how greatly people over the age of 65 years can contribute to the resident labour force.
- 3.23 The PPG states 'where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns' (PPG, ID2a, 018). Whilst the 2012-based SNPP do project an increase in the working age population in Medway, further work is required in order to determine whether the level of workforce growth is sufficient to support the projected level of job growth.

iii) Communities and Local Government (CLG) household projections

- 3.24 Table 3.5 sets out the official CLG household projections in chronological order from the 2008-based series to the most recent 2012-based series (27 February 2015).

Table 3.5: CLG Household Projections for Medway

Series	2012	2021	2033/35	2037	2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012-based	108,190	120,470	137,640*	139,950	12,280 (1,360)	29,450 (1,280)	31,760 (1,270)
2011-based (interim)	107,970	119,320			11,350 (1,260)		
2008-based	107,470	116,090	125,890**		8,620 (960)	18,420 (880)	

Source: (CLG) Communities and Local Government (rounded to nearest 100) Note: Figures may not sum due to rounding

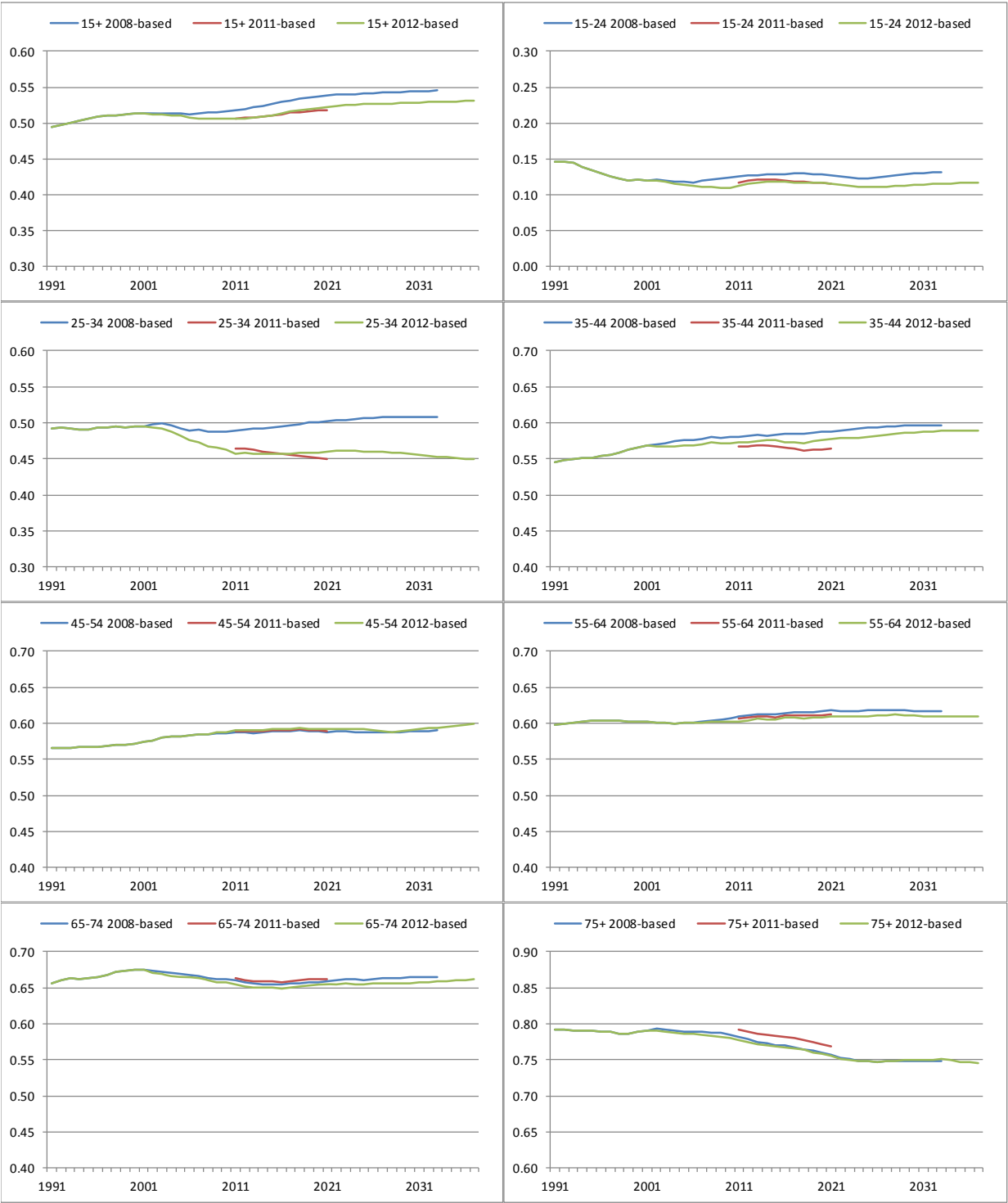
*2035; **2033

- 3.25 As the PPG states the CLG projections should form the 'starting point estimate' only of overall housing need as part of a full objective assessment of need. The latest CLG 2012-based household projections show growth of 1,280 households per annum in Medway over the Plan period (2012 and 2035). To reach a dwelling requirement, account needs to be taken of vacant and second homes. For Medway this rate is 3.27%⁵ resulting in a dwelling projection of 1,323 dwellings per annum, 2012 to 2035.
- 3.26 The growth projected by the CLG 2012-based household projections is higher than the growth projected by the previous two series of household projections (the 'interim' 2011 and 2008-based series), but this is expected given the 2012-based SNPP projected higher population growth than the other two series.

⁵ CLG, CTB 2014 (Second Homes); CLG Live Table 125/615 (Vacant)

- 3.27 However, like the 2012-based SNPP, the 2012-based household projections are also underpinned by recessionary trends in relation to household formation, whereas the 2008-based projections are underpinned by trends gathered prior to the recession and are therefore higher in terms of projected household formation, particularly in younger age groups.
- 3.28 The CLG have published household formation data for the 2012-based household projections (household formations rates by age and gender). The rates show that household formation in the 2012-based projection still projects a declining household formation rate trend in the 25-34 and 35-44 age groups (see Figure 3.2 below) when compared with the interim 2011-based and 2008-based projections.
- 3.29 The interim 2011-based household projections were widely regarded to project forward very low household formation in younger age groups. This was due to the trends underpinning the projections covering the period just prior to and including the recessionary period, when housing became rapidly less affordable for people in the younger age groups due to a lack of supply.
- 3.30 Figure 3.2 illustrates that the 2012-based rates for Medway follow a similar trajectory to that of the interim 2011-based projections before them. After 2025 the 2012-based projection shows a declining trend which results in the gap between the 2008 and 2012-based rates increasing, and suppression in the 2012-based rate worsening.

Figure 3.2: Household Formation Rates, Medway



Source: CLG

- 3.31 The trend for declining household formation in the 25-44 age group is likely to be caused in part by worsening affordability. Planning for housing on the basis of a continuation of these suppressed household formation rates is not supported by PPG which recommends adjustments to households formation rates to reflect factors not captured in past trends (ID 2a-015).
- 3.32 Furthermore, planning on the basis of the 2012-based household formation rates is not considered to be in accordance with the principles of positive planning, and would likely place significant pressure on housing supply. Recent Planning Inspectorate decisions concur with this view.⁶
- 3.33 In this context, and given that the 2012-based projections show slightly lower household formation particularly for 25-44 year olds than the pre-recessionary 2008-based projections, it is considered that an adjustment needs to be made to comply with the National Planning Policy Framework's (NPPF) clear policy to 'boost significantly' the supply of housing, 'promote economic growth' and 'positively prepare' Local Plans.
- 3.34 How this adjustment should be applied has been subject of much debate, and there is not considered to be one correct answer, as it is a matter of judgement. However Barton Willmore would suggest a blended approach whereby the 2012-based HFRs are applied in all age groups, as published, with the exception of the 25-44 age group. In this age group it is considered that a gradual return to the projected 2008-based HFRs by the end of the Plan period is applied. This is considered to comply with the NPPF requirement to ensure that Local Plans are positively prepared, and a significant boost is made to housing supply.

iv) Housing Completions

- 3.35 A lack of housing completions can have a significant impact on the ability for people to move into an area to live, and for existing residents to have the opportunity to purchase their own property. A lack of housebuilding can lead to existing residents having to migrate out of the area. Table 3.6 sets out net completions for Medway over the past 10 years.

⁶ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

Table 3.6: Net Completions, Medway

Year	Net Completions	Plan Target	Surplus/Deficit
05/06	562	700	-138
06/07	591	815	-224
07/08	761	815	-54
08/09	914	815	+99
09/10	972	815	+157
10/11	657	815	-158
11/12	809	1,000	-191
12/13	565	1,000	-435
13/14	579	1,000	-421
14/15	483	1,000	-517
Total	6,893	8,775	-1,882

Source: Annual Monitoring Report

- 3.36 As Table 3.6 shows, since 2005/06 the number of completions has consistently fallen below Development Plan targets, with the exception of two years (08/09 and 09/10). This has resulted in a deficit of -1,882 dwellings over 10 years, representing 20% of planned supply.
- 3.37 Furthermore when compared against the official CLG household projections set out above in Table 3.6, the starting point estimate of need has been at least 1,260 per annum, which suggests under-delivery has been even worse than the comparison against Plan targets.
- 3.38 Notwithstanding this it is considered that this persistent under-delivery in Medway will have had a significant impact on the propensity of people to migrate into the area over the last 10 years. The net-migration trends can therefore be considered to have been constrained by a lack of delivery.

v) Summary

- 3.39 In summary, this section has considered the most up-to-date official population and household projections published by CLG and ONS. The key headlines from this section are as follows:
- The PPG emphasises that CLG household projections should only form the 'starting point' in an objective assessment of the overall housing need, and that sensitivity testing based on alternative demographic and household formation assumptions may be considered;

- This 'starting point estimate' is currently growth of 1,281 households per annum in Medway, using the latest 2012-based CLG household projections over the period 2012-2035 (Medway's plan period). Applying a household/dwelling adjustment (to account for vacancy and second home rates) the overall housing need is 1,323 dwellings per annum;
- However, Barton Willmore consider that growth of 1,323 dwellings per annum could represent an underestimate of demographic-led housing need for a number of reasons:
- The 2012-based household projections are based on household formation rate trends observed over the recessionary period, when affordability worsened significantly. There remains suppression in the household formation rates for 25-34 year olds in Medway. PPG states that adjustments may be required to the household projection estimate of need if rates have suppressed historically (paragraph 15). An adjustment in Medway is considered necessary in the 25-34 age group to address this suppression;
- Analysis of net housing completions has highlighted that annual completions have consistently fallen below the level of need required by consecutive Development Plans, and below official CLG household projections, inhibiting the propensity of people to migrate into Medway. This would have directly influenced the net migration trends underpinning the 2012-based ONS SNPP and the 2012-based CLG household projection;
- The 2012-based ONS SNPP are also considered a conservative projection in respect of the international migration assumption they are underpinned by (165,000 people per annum). This is less than half the most recent trend data from ONS shows (336,000 people per annum).
- Analysis of migration trends has concluded that the 2012-based SNPP provide a reasonable basis on which to assess demographic-led need in Medway at this point in time. However, for the reasons set out above the 2012-based SNPP should be considered a very minimum and if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase, then an updated short term migration should be considered.

3.40 This section identifies how the starting point estimate of OAN (1,323 dpa, 2011-2031) for Medway should be considered a very minimum.

3.41 The following section of this study considers the evaluation of official ONS and CLG data in the context of the Council's OAN evidence.

4.0 REVIEW AND CRITIQUE OF THE STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

A) INTRODUCTION

- 4.1 The Strategic Housing and Economic Needs Assessment (SHENA) dated November 2015 provides the evidence base to support the Council's determination of Objectively Assessed Need (OAN) for housing in Medway. The report has been prepared by Bilfinger GVA.
- 4.2 In the context of our assessment of demographic data in the previous section of this study, the following section provides an analysis and evaluation of the SHENA's approach to OAN in Medway. The analysis we present follows the methodological requirements of section ID2a – 'Housing and Economic Development Need Assessments' (HEDNA) to determine whether the Council's proposed housing target (1,281 dwellings per annum) represents full, unconstrained OAN.
- 4.3 It is important to note that the SHENA has assessed OAN over the period 2012-2037 which is the time period considered by the latest 2012-based projection series. However, the draft Local Plan covers the period 2012-2035.

B) NORTH KENT STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

- 4.4 The 2015 SHENA seeks to establish the OAN for Medway following the methodology outlined in PPG. We would comment on the SHENA as follows:

i) Housing Market Area (HMA)

- 4.5 The SHENA begins with an assessment of the appropriate HMA in which to assess housing needs for Medway as required by PPG (ID 2a-010-20140306). The assessment's analysis draws on research published by CLG in 2010 titled 'Geography of Housing Market Areas'. In essence this research is based on work undertaken by the Centre for Urban & Regional Development Studies (CURDS) at Newcastle University.
- 4.6 The CURDS analysis is correctly presented by the SHENA as identifying Medway as falling within the London Strategic Housing Market Area which contains over 70 local authority areas. The SHENA considers this HMA definition is unmanageable and impractical (paragraph 2.9). Barton Willmore concurs with this conclusion.

- 4.7 For this reason, the SHENA also considers travel to work and migration patterns, and house price data and concludes that Medway has strong relationships with a number of neighbouring local authority areas. On this basis, the SHENA identifies a wider HMA which includes: Medway; Gravesham; Swale; Maidstone; and Tonbridge & Malling. The housing needs of the wider HMA are assessed in the SHENA
- 4.8 Barton Willmore consider the HMA definition applied in the SHENA to be inconsistent with the approach adopted in several of the authorities included within the definition. For example, Swale's housing needs were considered in isolation at the recent (November 2015) Local Plan Examination after the evidence base suggested Swale formed a HMA on its own. Similarly, Maidstone Borough are assessing their housing needs in isolation. Although Maidstone's SHMA identifies functional relationships between Maidstone and Medway, the Maidstone SHMA concludes that there is justification to distinguish Maidstone from Medway in market terms⁷. On this basis, the Maidstone SHMA considers Maidstone represents a HMA on its own.
- 4.9 On the basis of Maidstone Council and Swale Council both assessing their needs in isolation, Barton Willmore, for the purposes of this critique, consider Medway's needs in isolation.

ii) Starting point estimate

- 4.10 The SHENA gives detailed consideration to the latest 2012-based ONS Sub National Population Projections (SNPP) and CLG household projections as representing the 'starting point' estimate of need. Growth of 1,270 households per annum over the period 2012-2037 is correctly presented. However, it is important to note that over the period covered by the draft Local Plan (as presented in the current Issues and Options consultation as being 2012-2035) growth is 1,280 households per annum. The SHENA does not present this.

iii) Demographic adjustments

- 4.11 The PPG (paragraph ID2a-017) states how plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest ONS population estimates.

⁷ Paragraph 2.39, page 29, Maidstone Strategic Housing Market Assessment – Maidstone Borough Council, Final report, January 2014, GL Hearn

Adjustment to household formation rates

- 4.12 The SHENA does not undertake any sensitivity testing in relation to household formation.
- 4.13 The analysis presented in Chapter 3 of this report has shown clear suppression in household formation for those people aged 25-44 years, which Barton Willmore considers should be addressed through making an adjustment to the rates.
- 4.14 The danger of planning on this basis of the 2012-based household formation rates would be to exacerbate this suppression over a 23-year Plan period, adding to the trend of worsening affordability in Medway, and the inability of first time buyers to form their own households. This is not considered to comply with the NPPF requirement to positively prepare Development Plans.
- 4.15 Recent appeal decisions⁸ have agreed that there remains an element of suppression in the 2012-based household formation rates. A more positive approach to household formation in this age group would increase the starting point estimate above 1,270 households per annum (2012-2037)/ 1,280 households per annum (2012-2035).

Adjustment to the demographic projections

- 4.16 The SHENA presents three sensitivity scenarios with regards to the underlying population projections as an alternative to the published 2012-based ONS SNPP.
- 4.17 The **first** demographic sensitivity scenario included by GVA incorporates the 2013 and 2014 Mid-Year Population Estimates (MYPE), published by the ONS after the 2012-based SNPP were published. Despite the 2013 and 2014 MYPE projecting higher population growth than projected in the 2012-based SNPP, the effect of the SHENA incorporating the 2013 and 2014 MYPE into the 2012-based SNPP is to reduce household growth from 1,270 to 1,235 households per annum (2012-2037).
- 4.18 This seems counterintuitive (a point which the SHENA also raises at paragraph 5.38). However, the SHENA states that the reduction in household growth is due to the different age/ gender profile applied as a result of taking account of the 2013 and 2014 MYPE. This requires further investigation through bespoke modelling to establish whether this statement is correct.

⁸ Coalville and Cornwall

- 4.19 The **second** is a long-term (2005-2014) net-migration scenario which results in household growth of 1,148 households per annum – again lower than the ‘starting point’ estimate for 1,270 households per annum (2012-2037) as indicated by the 2012-based CLG household projections. This scenario projects household growth that is 10% lower than the starting point estimate.
- 4.20 Lower household growth is the result of lower projected population. The long-term trend (2005-2014) projects lower population growth because net migration is assumed to be lower (756 net migrants per annum) compared to the average net migration assumption of the 2012-based ONS SNPP (840 people per annum based on trends from the period 2007-2012).
- 4.21 At paragraph 5.39 the SHENA states that the later years of the inter-Census period (2001-2011), and the last three years since the 2011 Census (2012-2014) show the highest levels of population growth in Medway since 2001. The SHENA then goes on to state how the 2012-based CLG household projections are underpinned by trends drawn “principally from this period of high growth”⁹, and it is therefore appropriate to consider longer term trends from 2004-2014.
- 4.22 In this regard the latest Planning Advisory Service (PAS) guidance on OAN summarises the problems of using the 2007-2012 period as follows:

“The base period used in the latest official projections, 2007-12, is especially problematic. The period covers all of the last recession, in which migration was severely suppressed as many households were unable to move due to falling incomes and tight credit. Therefore the official projections may underestimate future migration - so that they show too little population growth for the more prosperous parts of the country, which have been recipients of net migration in the past. If so, by the same token the projections will also overestimate population growth for areas with a history of net out-migration.”¹⁰

- 4.23 Whilst Barton Willmore do not disagree with the consideration of longer term trends, the PPG supports adjustments to the ‘starting point’ estimate of need in relation to the underlying demographic projections and household formation rates. However, PPG states that any local changes would need to be clearly explained and justified on the basis of the established sources of robust evidence (ID 2a-017-20140306). In this instance, consideration of longer term trends does not seem appropriate for Medway as analysis of components of population change (see

⁹ Paragraph 5.39, page 93, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

¹⁰ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

Table 3.2 presented in Chapter 3 of this report and Figure 29 of the SHENA) clearly identifies net migration to Medway increasing since 2011. Therefore to consider a level of net in-migration lower than the 2012-based ONS SNPP in Medway is considered to wholly contradict the advice of the PAS Guidance.

- 4.24 GVA have chosen not to analyse a more recent 5-year trend, a decision Barton Willmore do not consider to be justified.
- 4.25 Analysis of migration trends, presented in Chapter 3 of this report, has illustrated that a more recent 5-year migration trend (2009/10 – 2013/14), which incorporates the last few years of recession, and the recent economic upturn, suggests net migration of 1,159 per annum. This is higher than the assumptions which underpins the 2012-based SNPP (840 migrants per annum) based on trends from the period 2007-2012.
- 4.26 However, there is not sufficient data at this point in time to say with any certainty whether Medway is experiencing a reversal of trend in terms of net migration. For this reason, despite a more recent 5-year trend showing higher net migration than the 2012-based SNPP, it is considered that the 2012-based SNPP provide the most reasonable demographic projection at this point in time. However, the 2012-based SNPP should provide the very minimum projection of population growth given the issues highlighted in Chapter 3 of this report. Furthermore, we reserve the right to amend this approach if subsequent releases of Mid-Year Population Estimates indicate that net migration to Medway is continuing to increase.
- 4.27 A **third** sensitivity scenario is the long-term net-migration scenario (2005-2014) including the ‘unattributable population change’ (UPC) recorded by ONS for Medway. The UPC is an element of population change which the ONS cannot account for. There is the possibility that it may be due to under recorded levels of international migration, but it could equally be due to other reasons.
- 4.28 The effect of including UPC within the long-term migration trend scenario is to reduce household growth to 1,124 households per annum (compared to growth of 1,148 households per annum excluding UPC) over the period 2012-2037.
- 4.29 Barton Willmore’s approach is to exclude UPC from demographic modelling scenarios. This is based on the following:
- ONS’ confirmation that UPC has been excluded from the calculation of the 2012-based ONS SNPP;

- Advice sent by email from ONS to Barton Willmore that it would be 'sensible' to exclude UPC from the calculation of net-migration trends;
- The ONS statement that if UPC was due to international migration, its effect would have been in the first half of the decade, after which the recording of international migration was improved;
- Local Plan Examination decisions where UPC has been excluded (Aylesbury Vale, Eastleigh, Arun). In the case of the most recent decision in Arun (February 2016), UPC was significant, yet the Inspector noted that if UPC were to be attributed to migration, errors would have been earlier in the 2001-2011 period;
- The ONS' statement that UPC is only applicable to the 2001-2011 period and does not introduce a bias that will continue in future projections.

4.30 The UPC scenario is therefore not considered to be a robust scenario for growth in Medway.

4.31 The SHENA presents demographic-led need in Medway to be between 1,124 and 1,270 households per annum over the period 2012-2037 based on the results of the two long-term migration trend scenarios. Once an allowance for vacancy has been applied this results in dwelling growth of between 1,167 and 1,317 dwellings per annum.

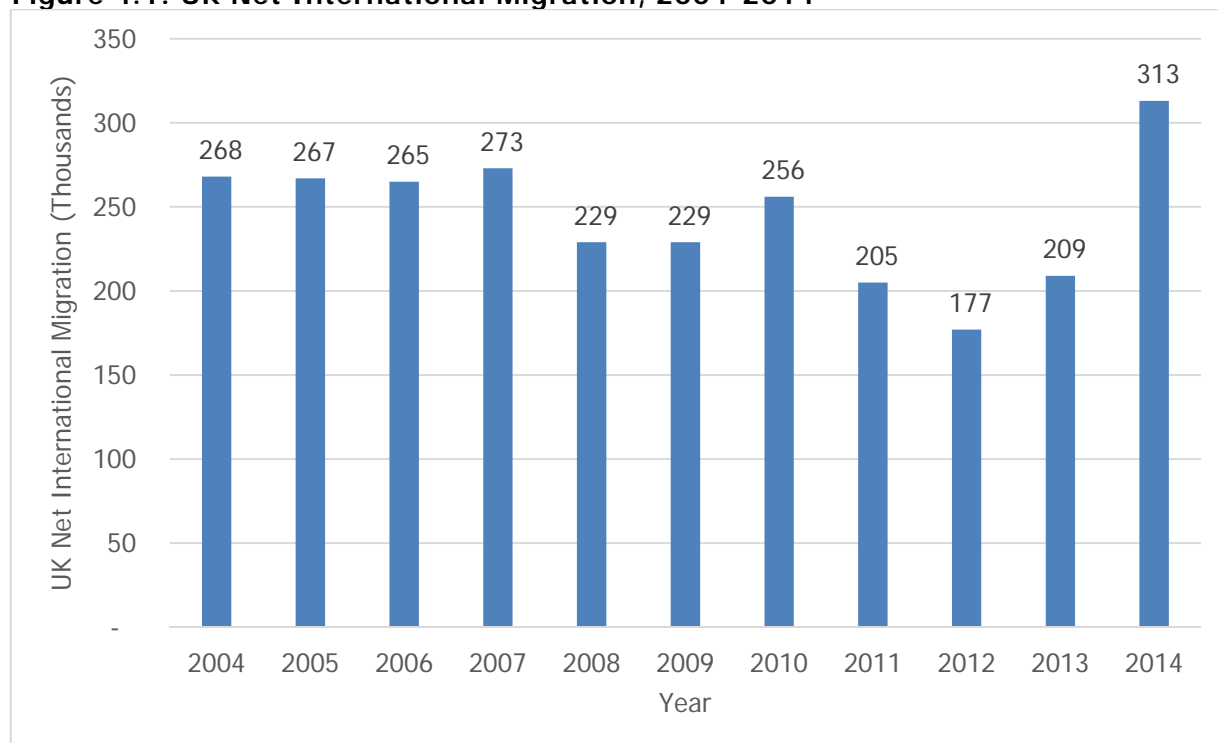
4.32 However, the SHENA acknowledges that due to the uncertainty of UPC, it is appropriate to consider an average of the two long-term migration scenarios (including and excluding UPC)¹¹. This results in growth of 1,136 households (1,179 dwellings) per annum over the period 2012-2037.

4.33 Barton Willmore consider that OAN of less than the 2012-based CLG household projection should not be considered, for the following reasons:

4.34 First, the 2012-based ONS SNPP were underpinned by net migration trends between 2007 and 2012, and as this analysis shows, they are underpinned by three years (2008-2011) when net in-migration fell significantly below two of the years prior to the 2007-2012 period. This contradicts GVA's statement that the later years of the 2001-2011 period show the highest levels of growth. This statement by GVA is not considered to be justified.

¹¹ Paragraph 5.47, Page 95, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

- 4.35 The **second point** concerns the assumption of net international migration in the 2012-based ONS National Projections, which underpin the 2012-based ONS SNPP. The 2012-based ONS national population projections are based on net international migration of 165,000 people per annum continuing every year up to 2037.
- 4.36 The assumption of net international migration in the ONS 2012-based national projections is considered by Barton Willmore to be a significant underestimate. This view is based on more recent evidence from ONS which shows how international net-migration was 336,000 people in the most recently recorded year (ending June 2015) – over double the 2012-based ONS national projection assumption. The 10-year average has also been circa 240,000 people per annum (see Figure 4.1 below).
- 4.37 On this basis alone, it is considered the 2012-based ONS SNPP, and therefore the 2012-based CLG household projections, are based on conservative assumptions and for this reason should be considered a minimum projection of future growth.
- 4.38 This is emphasised further by the more recent 2014-based national projections (29 October 2015) which have increased the assumption to 185,000 people per annum. The effect of this increase will be seen in the 2014-based SNPP, which are due for release in the first half of 2016.
- 4.39 A further effect on in-migration is the delivery of housing. Table 3.6 in this study has shown how delivery has fallen below planned targets in all but two of the past ten years. The cumulative effect has been for a deficit in delivery of 1,882 dwellings (20% lower than planned supply). This will have constrained in-migration to Medway, and trends would have been higher if planned housing targets had been met and the homes were there to be filled.

Figure 4.1: UK Net International Migration, 2004-2014

Source: Migration Statistics Quarterly Report, November 2015

4.40 Finally it is considered the past three years net in-migration to Medway (1,280, 1,293, and 1,793 people per annum respectively) highlight how the 2012-based SNPP and CLG projections are based on a conservative net in-migration assumption of only 840 people per annum.

4.41 However, given there is no degree of certainty as to whether Medway is experiencing a reversal of trend in relation to net migration, it is considered that the 2012-based SNPP at the very least should provide the minimum projection of future population growth. On this basis, for the Medway SHMA to favour the long-term migration trend approach (which projects lower population growth) is considered inappropriate.

4.42 In summary, it is not considered justified to project lower population or housing growth than the starting point estimate.

iv) Adjustments to support economic growth

4.43 The approach applied by GVA in the SHENA to economic-led OAN is generally considered robust, save for the assumptions in respect of job growth forecasts. GVA use a single source, Experian Economics, from quarter 1 of 2015. Experian is considered a robust source of job growth forecasts, however it is Barton Willmore's view that an average forecast should be taken from three sources; Experian Economics, Cambridge Econometrics, and Oxford Economics. This view has been taken following criticism of the use of using a single source in some Local Plan

examinations, given the fluctuation in forecasts, which are often published on a quarterly basis. This triangulated approach was supported by the South Worcestershire Local Plan Inspector¹².

- 4.44 In terms of unemployment assumptions, Barton Willmore's approach would be to assume a return to pre-recessionary rates of unemployment over the first ten years of the Plan period. This is a similar approach to the GVA method although they do differ slightly.
- 4.45 Economic activity rate assumptions must also be entered into demographic modelling software to generate the labour force growth required to fill jobs. GVA's approach is to use the Kent County Council 'Technical Paper Activity Rate Projections to 2036' paper (October 2011). This is the same source used by Barton Willmore, and is considered to be a robust independent method which provides unbiased assumptions of how economic activity will increase in older age groups over the next 25 years. However it should be noted that a more recent (November 2014) paper is available and this should be used in preference to the October 2011 edition.
- 4.46 The SHENA also undertakes a sensitivity test of economic activity which incorporates assumptions from Experian's Report 'Employment Activity and the Ageing Population' which has the effect of increasing economic activity of women in line with past trends from 1981, along with significantly increase economic activity for older people.
- 4.47 The commuting ratio is the final assumption which can have a significant effect on economic-led housing need. GVA's approach is to use the 2011 Census ratio of 1.28, and for this to remain static over the Plan period. This is considered a robust approach to apply.
- 4.48 The SHENA considered three economic scenarios but only presented the results of two – the Sector Based Growth scenario and the Sector Based & London Paramount Indirect Scenario. Housing need to support both economic scenarios increases above the baseline demographic needs (1,179 dwellings per annum as indicated by the mid-point of the two long-term migration trends) if KCC economic activity rates are applied; to support the Sector Based Growth scenario 1,197 dwellings per annum are required and to support the London Paramount Indirect scenario a total of 1,213 dwellings per annum are required.
- 4.49 If Experian's economic activity rates are applied, housing need to support both economic scenarios is below the baseline demographic need (1,020 dpa required to support Sector Growth scenario and 1,036 dpa to support the London Paramount scenario).

¹² Stage 1 of the Examination of the South Worcestershire Development Plan; Inspector's Further Interim Conclusions on the Outstanding Stage 1 Matters, 31 March 2014

- 4.50 It is important to note that the level of housing need identified from both economic scenarios and both economic sensitivity tests, is below the 'starting point' estimate of 1,270 households/1,317 dwellings per annum (2012-2037) as indicated by the CLG 2012-based household projections.

v) Market signals adjustment

- 4.51 The GVA report provides a summary of median **house price** increases in Medway between 2000 and 2013. The source used by GVA in obtaining this information (CLG) is considered robust. As GVA summarise, between 2000 and 2013, values in Medway increased by 128.6%; the second fastest rate observed out of seven authorities analysed. The rate also exceeded inflation in the south east region as a whole (96%).¹³
- 4.52 The SHENA's summary of rental prices shows a significant worsening in the lower quartile **rental prices** in Medway. Over the short period analysed (2010-2014), lower quartile rents increased by 10%; the second highest of the seven authorities analysed. This represents an increase of double that experienced in the south east region (4.3%), and triple the increase across England (3.3%). There is a clear affordability problem in respect of lower quartile rents in Medway when compared to surrounding areas.
- 4.53 The change in the **affordability ratio** is often the most crucial of market signals indicators, and the GVA report provides a summary of the lower quartile and median affordability ratios in Medway, compared to seven Kent authorities, the south east region, and nationally. The GVA report highlights how the lower quartile affordability ratio in Medway had increased by 65% between 2000 and 2013, and that this increase represents a more acute increase than the region (51%) and nationally (65%).¹⁴ This highlights how affordability has significantly worsened in Medway over the thirteen years analysed.
- 4.54 This study (section 3) identifies how household formation is suppressed in the 25-34 age group in the most recent 2012-based CLG household projections. The result of assuming the formation rates as published, and planning for growth based on them, will be a failure to address the significant increase in **concealed households** in Medway between the 2001 and 2011 Censuses. This increase across the country has been due to the significant worsening affordability of housing, leading to two or more adult households living with one another rather than forming their own households.

¹³ Paragraph 5.90, SHENA

¹⁴ Paragraph 5.97, SHENA

- 4.55 This trend is evidenced in Medway by the 68% increase in concealed households between the 2001 and 2011 Census'. This is broadly comparable to the regional and national averages (71%) although the SHENA states that concealment is not deemed to be worsening at a significant rate. However, the rate of increase in Medway is higher than in Canterbury (66%), Sevenoaks (56%), and Tonbridge and Malling (54%).
- 4.56 Furthermore the SHENA acknowledges a 13.03% increase in concealed households in the under 25 age group (13%). This is higher than the national average (12.76%) and several other Kent local authorities (Canterbury, Dartford, Maidstone, and Swale).¹⁵ Despite this, the SHENA concludes that the market signals information in respect of concealed families does not provide strong evidence of supply led pressures in Medway¹⁶. Barton Willmore disagree and a response in establishing the OAN for Medway is needed to alleviate this worsening trend.
- 4.57 The **rate of development** is also considered as a market signal, with the PPG stating how future supply should be increased to reflect the likely under-delivery of a Plan, if the rate of development has been lower than the planned number. A meaningful period must be assessed in line with PPG, and as this study has shown (Chapter 3), delivery in Medway has been 20% lower than the planned number over the past 10 years.
- 4.58 The GVA report also identifies this lack of delivery, but over the intercensal period (2001-2011) rather than the last 10 years considered in this study (2005-2014). Notwithstanding this difference, GVA identify growth in Medway's housing stock of 7.3%; lower than the sub-regional, regional, and national averages. Furthermore GVA identify how completions have exceeded planned targets in only three of the 12-year period between 2001/02 and 2012/13¹⁷.
- 4.59 In summary, it is important to note the PPG, which states the following in respect of market signals:

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings." ¹⁸

"Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections." ¹⁹
(Our emphasis)

¹⁵ Table 51, SHENA

¹⁶ Paragraph 5.108, SHENA

¹⁷ Paragraph 5.118, SHENA

¹⁸ ID2a-019, Housing and Economic Development Needs Assessments, PPG

¹⁹ ID2a-020, Housing and Economic Development Needs Assessments, PPG

- 4.60 In the context of the PPG, and the analysis set out by GVA, it is clear that an upward adjustment to the CLG household projection for Medway is required. Failure to do so will only serve to exacerbate the conditions which have led to the affordability problems experienced in Medway over the past 10 to 15 years.
- 4.61 The PPG does not quantify the market signals uplift, other than to say how “plan makers should set this adjustment at a level that is reasonable” and “on reasonable assumptions could be expected to improve affordability.”²⁰ Local Plan Examination decisions are the only source in which market signals adjustments have been quantified. At the Eastleigh Local Plan Examination, the Inspector recommended a 10% uplift to demographic-led projections in order to alleviate market pressure considered as “modest”. This level of uplift was considered “cautious” by the Inspector.²¹ The same level of uplift was also considered applicable by the Uttlesford Local Plan Inspector.
- 4.62 An equally cautious uplift of 10% to the 2012-based CLG household projection in Medway would result in an increase to at least **1,456 dwellings per annum**.
- 4.63 The SHENA considers the level of uplift the economic-led scenarios with KCC economic activity rates applied would make to the baseline demographic level of need (mid-point between the two long term migration trends). This is presented as between a 1.5% and 2.9% uplift which is not considered sufficient to respond to the local market signals.²² Barton Willmore agree.
- 4.64 As an alternative, the SHENA also considers the level of uplift the CLG 2012-based household projections, updated to take account of the 2013 and 2014 MYPE, provides to the mid-point of the two long-term migration trends. This is presented as being equivalent to an 8.6%, which the SHENA considers a significant uplift.²³
- 4.65 On this basis the **SHENA concludes on OAN for Medway of 1,281 dwellings per annum** (2012-2037) as indicated by the CLG 2012-based household projections updated to take account of the 2013 and 2014 MYPE.
- 4.66 Barton Willmore do not consider the market signals uplift applied in the SHENA to be sufficient. The SHENA’s ‘uplift’ is applied to the SHENA’s long-term migration trend which is already below the starting point estimate according to PPG. Therefore even applying the market signals ‘uplift’ results in OAN that is still below the starting point estimate (1,281 dpa compared to 1,323 dpa).

²⁰ ID2a-020, Housing and Economic Development Needs Assessments, PPG

²¹ Paragraphs 39-41, Eastleigh Borough Local Plan, Inspector’s Report, February 2015

²² Paragraph 5.129, SHENA

²³ Paragraph 5.130, SHENA

vi) Affordable housing need

- 4.67 As stated in the NPPF, LPAs are required to ensure their local plans meet OAN for both market and affordable housing. The Satnam v Warrington BC High Court Judgment provides useful guidance on the proper exercise that needs to be undertaken to assess affordable need as part of OAN. That is:

“(a) having identified OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes; (our emphasis)

(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPG, paragraphs 14 and 47.”²⁴

- 4.68 The ELM Park v Kings Lynn and West Norfolk BC High Court Judgment (July 2015) provides a more recent judgement on the role of affordable housing need within OAN, determining that affordable need did not have to be met in full when determining OAN but rather:

“This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA “addresses” these needs in determining the FOAN. They should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area.”²⁵

- 4.69 It is therefore clear that where there is significant affordable housing need, although it is not required to be met in full, an increase should be considered.

- 4.70 In the context of this, the Council's draft Plan states the following in respect of affordable housing need in Medway:

“The Strategic Housing Market Assessment (SHMA) carried out in 2015 for Medway identified a high level of demand for affordable housing, at 17,112 over the plan period. The Local Plan needs to be deliverable, and must demonstrate that the policies are viable. Initial analysis indicates that a percentage of 25% affordable housing would be deliverable on developments of over 15 units, taking into account land values and development costs.”²⁶ (our emphasis)

²⁴ Paragraph 43 (iv) (a) and (b), High Court Judgement CO/4055/2014, Satnam Millennium Limited v Warrington Borough Council, 19/02/2015

²⁵ Paragraph 33, page 11, High Court Judgement CO/914/2015, Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government, ELM Park Holdings Ltd, 09/07/2015

²⁶ Paragraph 7.12, page 21, Medway Council Issues and Options Consultation Document, January/February 2016

- 4.71 This is a significant level of affordable housing need, equating to 744 affordable dwellings per annum. To deliver this level of affordable housing in full, at provision of 25%, would require full OAN of circa 3,000 dwellings per annum, 2012-2035. It is accepted that 3,000 dwellings per annum is unrealistic, but a figure in excess of the Council's existing target would help to meet some of this affordable need.

vii) Summary

- 4.72 In summary, the SHENA identifies OAN for Medway as being 1,281 dwellings per annum over the period 2012-2037 based on the results of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates.
- 4.73 This level of housing need has been taken forward in the draft Local Plan to represent need over the period 2012-2035.
- 4.74 OAN of 1,281 dwellings per annum is not considered to represent full OAN for Medway over the plan period (2012-2035) for the following reasons:
- There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dwellings per annum, 2012-2035;
 - The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The GVA SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are 'positively prepared' an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;
 - The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very minimum projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;

- The GVA SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined above we believe to be inappropriate;
- The GVA SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The GVA SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 This review of the Strategic Housing and Economic Needs Assessment (SHENA) has considered the objectively assessed need (OAN) for housing over the period 2012-2037 which has been taken forward in the Medway Council Plan Issues and Options document which is planning for housing needs over the period 2012-2035. **Full OAN is presented in as being 1,281 dwellings per annum over the period 2012-2035.**
- 5.2 In short it is considered the OAN presented in the SHENA plans for very low levels of demographic growth over the Plan period, and does not represent a positively prepared OAN. From the outset, it is important to note how the level of OAN presented in the SHENA is below the PPG's starting point estimate of need – the latest CLG household projection (1,323 dpa, 2012-2035).
- 5.3 The SHENA's OAN conclusion is underpinned by applying 2012-based household formation rates to their preferred population projection (a revised 2012-based ONS SNPP scenario to reflect 2013 and 2014 ONS Mid-Year Population estimates). The 2012-based CLG household projection projects suppressed household formation for those aged 25-44 years of age; those most likely to represent concealed households and first time buyers. Barton Willmore consider it necessary to apply an adjustment to address this suppression and positively prepare the Local Plan, an exercise which has not been undertaken in the SHENA. This approach is supported by recent Planning Inspectorate decisions, which note continuing suppression in the 2012-based CLG projections.²⁷
- 5.4 Notwithstanding that the starting point estimate of OAN (1,323 dpa, 2012-2035) is higher than the Council's proposed level of provision, the starting point estimate should be considered a very minimum for a number of reasons.
- 5.5 The 2012-based CLG household projection is underpinned by the 2012-based Sub National Population Projections (SNPP) which assume very low net international migration to the UK (165,000 people per annum) compared with more recent trends (336,000 people in the last recorded year), an assumption which filters down to local authority level and has been identified by recent Local Plan Inspector's decisions²⁸. PAS Guidance also identifies how the net migration of the 2012-based ONS SNPP may well be an underestimate²⁹.

²⁷ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁸ Paragraph 1.12, page 3, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁹ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

- 5.6 Furthermore, analysis of migration trends has identified that the net migration assumptions of the 2012-based SNPP (840 net migrants per annum, 2012-2037) is low in the context of a more recent 5-year trend given that net migration to Medway has increased over recent years.
- 5.7 However, because it cannot be said with any certainty whether Medway is experiencing a reversal of trend in respect of migration, it is considered reasonable to use the 2012-based SNPP as the most appropriate demographic population projection at this point in time. However, if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase then it would be considered appropriate to change this approach.
- 5.8 With the above points in mind, it is considered that the 2012-based SNPP should provide the very minimum projection of population growth in Medway.
- 5.9 The approach to assessing an uplift for economic growth is considered to be broadly sound. However it is considered that the use of only one forecast is a weak approach. Given the fluctuation of job growth forecasts, Barton Willmore would recommend an average of the three leading forecasting houses; Experian Economics, Cambridge Econometrics, and Oxford Economics. This approach was endorsed by the South Worcestershire Local Plan Inspector.
- 5.10 The SHENA does not suggest a direct uplift to account for worsening market signals. The SHENA acknowledges that some market signals in Medway have worsened to a greater extent than neighbouring local authorities, the south east region, and the national average. The PPG states that an upward adjustment to the demographic starting point should be applied in the event that any of the market signals indicators show a worsening trend. The SHENA considers the level of uplift the economic scenarios provide to be insufficient, however, the 8.6% uplift provided by the CLG 2012-based household projections (adjusted to take account of the 2013 and 2014 MYPE) is considered by the SHENA to provide a significant uplift.
- 5.11 Barton Willmore do not agree. The level of uplift considered by the SHENA is considered in the context of a baseline demographic level of need that is already 10% below the starting point estimate (1,136 compared to 1,270 households per annum) over the period 2012-2037. In effect, the uplift considered by the SHENA still falls below the starting point estimate of need as indicated by the CLG 2012-based household projections, and which Barton Willmore consider to provide a conservative projection of future housing need.
- 5.12 The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local

Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

Way Forward

- 5.13 The PPG states how the OAN should be an unconstrained assessment. The SHENA's approach to OAN is not considered to comply with the PPG in this regard, and sets an OAN below the PPG's starting point estimate. Adjustments for household formation suppression, more recent migration trends, worsening market signals, and affordable housing need indicate a requirement for OAN significantly higher than the starting point estimate of OAN, 1,323 dwellings per annum (2012-2035). The OAN suggested by the SHENA is considered to be wholly inappropriate and not positively prepared, as required by paragraph 182 of the NPPF.

Appendix 3

**Barton Willmore The North Field, Halling: Landscape Appraisal and Green Belt Review
(Barton Willmore, February 2016)**

The North Field, Halling: Landscape Appraisal and Green Belt Review

Prepared on behalf of Redrow Homes Ltd

February 2016

The North Field, Halling: Landscape Appraisal and Green Belt Review

Prepared on behalf of Redrow Homes Ltd

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Barton Willmore LLP
7 Soho Square
London
W1D 3QB



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ILLUSTRATIVE MATERIAL

Figure 1: Site Context Plan

Figure 2: Site Appraisal Plan

Site Appraisal Photographs (to be read in conjunction with Figure 2)

Site Context Photographs (to be read in conjunction with Figure 1)

1.0 INTRODUCTION

- 1.1 Barton Willmore Landscape LLP (BWLLP) were commissioned by Redrow Homes Ltd to undertake a Landscape and Visual Appraisal of land adjoining North Halling, west of the A228 (Formby Road / Rochester Road) with the purpose of identifying its suitability for residential development and subsequent release from the Green Belt.
- 1.2 The extent of the Site, is illustrated within Figure 1: Site Context Plan. Figure 2: Site Appraisal Plan illustrates an aerial view of the Site.
- 1.3 The Landscape and Visual Appraisal of the Site has been undertaken to:
 - i) Establish the landscape and visual sensitivity of the Site;
 - ii) To assess the Site's contribution to the purposes of the Green Belt, as stated in the National Planning Policy Framework (NPPF) and locally; and
 - iii) Inform any future development of a masterplan for residential development on the Site.

2.0 THE SITE, ITS LOCATION AND CONTEXT

- 2.1 The Site is located within Halling, Kent, on the western slope of the shallow valley formation of the River Medway, which extends northwards, to meet the River Thames at Rochester.
- 2.2 Land use along the western side of the River Medway within the vicinity of the Site and Halling is mixed, and includes industrial buildings, marinas, and residential development. The A228 and Pilgrims Road / Way (west of the Site) provide connectivity to the residential settlements and various land uses along the valley. Beyond this to the west, land rises more steeply, forming a backdrop that is primarily wooded with exposed chalk scarps.
- 2.3 Land use on the eastern side of the River Medway is less urbanised, and comprises primarily agricultural fields and scattered farmsteads. This land is within the Kent Downs AONB.
- 2.4 The Site is adjoined by residential properties on three sides; namely to the north, west and south, accessed from either the A228 or Pilgrims Way / Road.
- 2.5 The Site is approximately 6.8 hectares in area. The Site is an unmanaged, sloping field which falls from 35m AOD in the south-west to 5m AOD in the south-east. It comprises a block of woodland in the southern corner adjoining the A228 and an area of scrub / woodland the south-westernmost corner adjoining Pilgrims Road. Pylons extend along the southern boundary of the Site, beyond which is the recently constructed residential development to the south of the Site ("St Andrews Park").
- 2.6 With regards to relevant landscape and planning policy designations, the Site and / or the surroundings are subject to the following:
- The Site is within the Green Belt;
 - The Kent Downs Area of Outstanding Natural Beauty extends east-west across Kent, however, the River Medway and the urbanised land to the west of the River Medway (which includes Halling and the Site) are excluded from the Kent Downs AONB;
 - The River Medway and the land east of the A228, east of the Site are designated Strategic Gap. The Site is not included within this designation;
 - Much of the woodland which forms the steep wooded slopes to the west of the Site and Halling is designated as ancient woodland. There are no areas of ancient woodland within the Site;
 - The Site is not within or adjoined by a Special Landscape Area / Area of Local Landscape Importance as identified within the Medway Local Plan 2003;
 - There are no listed buildings within the Site or adjoining the Site; and
 - There are no Scheduled Ancient Monuments within the Site or adjoining the Site.

- 2.7 With regards to Public Rights of Way (PRoW), PRoW RS220 extends along the northern boundary of the Site, between the Site and residential properties to the north. Other PRoWs within the vicinity of the Site include PRoW RS201 which extends westwards from Pilgrims Way up the wooded scarp to the south-west of the Site from where elevated views across the River Medway can be obtained, and MR 1 along the eastern bank of the River Medway.
- 2.8 As demonstrated by the above, the Site is located within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is within the Green Belt, however, is surrounded by residential properties on 3 sides (including recent residential development to the south of the Site). With the exception of its Green Belt designation, the Site is not subject to any other landscape-related or planning policy designations.

3.0 RELEVANT PLANNING POLICY

- 3.1 The Site is within the Green Belt, as identified within the Medway Local Plan 2003 (saved Policy BNE 30). The preamble to saved Policy BNE 30 states that:

“In Kent, the Metropolitan Green Belt has helped to preserve the open countryside between the edge of Greater London and the urban areas of Medway, Maidstone, Tunbridge Wells, Sevenoaks and Tonbridge. At a more local level, it has helped maintain the open area between Medway and Gravesend.”

- 3.2 Under National Planning Policy Framework (2012), Green Belt is a functional designation, its purpose being to prevent urban sprawl by keeping land permanently open and as such the essential characteristics of Green Belts are their openness and permanence. Refer to Section 7 ‘Green Belt Review’ for further details.
- 3.3 To the east of the Site (east of the A228) is land designated as Strategic Gap (saved Policy BNE 31). The aim of this policy is, amongst other things, to prevent development that would result in the degradation of the open character or separating function of the land specifically included within the Strategic Gap. Due to the fact that the Site is not within the Strategic Gap, development on the Site would not affect the ability of land within the Strategic Gap to fulfil its function.

4.0 LANDSCAPE CHARACTER

National Landscape Character

Natural England's National Character Area Profile 119: North Downs

4.1 The Site lies within the North Downs Landscape Character Area (LCA), which extends from Guildford to Dover. Key characteristics identified on page 8 include:

- *"...A distinctive chalk downland ridge...*
- *... Chalk soils are predominant across the NCA...*
- *The area is cut by the deep valleys of the Stour, Medway, Darent, Wey and Mole...which contrast with the steep scarp slope...*
- *Woodland is found primarily on the steeper slopes... Well wooded hedgerows and shaws are an important component of the field boundaries, contributing strongly to a wooded character...*
- *Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern... "*

4.2 Key Landscape opportunities within NCA Profile 119 identified on page 54 include:

- *"Protect, conserve, an appropriately manage the highly distinctive chalk cliff coastline...*
- *Protect, conserve and enhance the character of much of the downland landscape devoid of development and urban intrusions... .*
- *...restoring, significantly expanding and relinking the wetland habitats of the Medway Gap...*
- *Manage, conserve, enhance and restore the characteristic pattern of thick well-treed hedgerows and shaws, forming a predominantly irregular field pattern."*

County Landscape Character

Kent County Council's Landscape Assessment of Kent 2004: Kent Downs – Medway, Western and Eastern Scarp.

4.3 The Site lies within the Kent Downs – Medway, Western and Eastern Scarp LCA, and is characterised by:

- Gently undulating arable farmland;
- Quarries;
- Open and wild character on eastern slopes with wide views; and
- Sparse remnant hedges leading up to wooded ridges with wide views from open and wild eastern slopes.

- 4.4 The LCA is described as a generally incoherent landscape of poor condition in which features do not reflect or enhance the landform, and that there are many visual detractors. The Medway Valley is described as having a significant landform, however, the lower slopes are described as unremarkable when considered in isolation. The LCA describes the landscape as open with moderate visibility, and states that hedged field boundaries and woodland are limited. With regard to the sensitivity of the landscape, the LCA describes this as low.
- 4.5 The Landscape Actions described within the LCA include the creation of a landscape framework to provide an urban edge arable fields and other farmland and the creation of shaws or wide hedgerows as enclosure and to provide a network of semi-natural habitats.

Borough Landscape Character

Medway Borough Council's Landscape Character Assessment March 2011: Character Area 39: Halling Quarries

- 4.6 The Site is located within Character Area 39: Halling Quarries. The Landscape Type is Rural Fringe, sub-type Rural fringe with urban/industrial influences. Characteristics are as follows:
- *“Scarp floor with rolling arable fields, interspersed with small settlements, disused quarries, industrial heritage and Peter’s Pit development infrastructure works*
 - *Heavily wooded disused pits fragment character but screen visual interruption*
 - *Blue Lake to south west of Halling Cement Works forms distinctive landscape feature; overhead pylons and cement works are detracting features*
 - *Southern part of character area extends into Tonbridge and Malling”*
- 4.7 The LCA is described as being of moderate condition, with some detracting features and moderate sensitivity. ‘Issues’ identified on page 105 include the new development proposals for Halling Cemex (south of the Site), and loss of rural character from new developments. ‘Guidance’ includes ensuring the use of appropriate native planting to screen new development from footpaths, roads, existing settlements and rural areas.
- 4.8 The substantial housing development that has been constructed within LCA 39 represents a substantial change to the character area. This residential development is not reflected within LCA 39, which was produced prior to the construction of the development.

Localised Appraisal of the Site and its context

- 4.9 The published landscape character assessments describe a predominantly chalk landscape, cut by deep valleys including the Medway Valley, where the upper slopes are typically well wooded. More locally, the Medway Valley is described as an incoherent landscape with wide,

open views, and of poor condition. Guidelines include the creation of a strong landscape framework incorporating wide hedgerows and shaws to provide a network of semi-natural habitats, and screening development with appropriate native planting from footpaths, roads, existing settlements and rural areas.

- 4.10 The published assessments broadly reflect the local landscape character of the western edge of the River Medway, which is incoherent and of low sensitivity. At a site specific level, the Site is unmanaged and overgrown, however, does comprise two woodland blocks which should be retained and enhanced as part of any proposed development in accordance with the published guidelines. The guidelines were written prior to the construction of the recent residential development to the south of the Site, which replaced former employment uses.

5.0 VISUAL APPRAISAL

- 5.1 A visual appraisal to ascertain the visibility of the Site in the wider landscape was undertaken in November 2015.
- 5.2 Figure 1: Site Context Plan sets out the viewpoint locations and the extent of visibility of the Site, to be read in conjunction with Site Context Photographs 1 - 10.
- 5.3 Site Context Photograph 1 is taken from the A228 (Formby Road / Rochester Road) looking west towards the north-eastern corner of the Site. The dense boundary vegetation along the A228 largely screens views from this fast moving, heavily trafficked road.
- 5.4 Site Context Photograph 2 is taken from PRoW RS220 which adjoins the northern boundary of the Site. PRoW RS220 is a narrow path, enclosed to the north by close boarded fencing of the adjoining residential properties and to the south by the scrub and trees which form the northern boundary of the Site. The Site and the recent residential development beyond this are visible, partially screened by the boundary vegetation.
- 5.5 Site Context Photograph 3 is taken from Pilgrims Road, west of the Site at the junction with PRoW RS220. The Site is not visible from this location, screened by a block of intervening woodland, the eastern edge of which forms part of the boundary to the Site.
- 5.6 Site Context Photograph 4 is taken from the westernmost edge of the Site, where part of the Site (that comprises a block of woodland) adjoins Pilgrims Road. Due to the dense woodland structure, only a limited part of the rest of the Site is visible from this location.
- 5.7 Site Context Photograph 5 is taken from PRoW RS201, south-west of the Site, on elevated land overlooking the Medway Valley. The recently constructed residential development to the south of the Site is visible, beyond which is the River Medway and associated industrial land uses. The woodland blocks within the Site are partially visible from this location.
- 5.8 Site Context Photograph 6 is taken from the A228 south of the Site, within proximity of the recently constructed residential development. The woodland blocks and boundary vegetation along the southern and eastern edges of the Site are visible, screening views into the Site.
- 5.9 Site Context Photographs 7 to 10 are taken from footpaths and roads to the east of the River Medway, looking across the River Medway. Existing development is prominent along the lower slopes of the Medway Valley, beyond which, land rises substantially, forming a backdrop to the view comprising woodland, scattered fields and chalk scarp. The Site is visible from these locations, seen in the context of residential properties to the west (visible above the Site), north and recently constructed properties to the south.

Summary:

- 5.10 The photographs demonstrate that the Site is partially visible from its immediate surroundings, however, views are typically filtered by intervening vegetation. More open views into the Site are obtained from land to the east of the River Medway, however, where these views are obtained, the Site is seen in an urbanised context of the lower slopes of the Medway Valley, beyond which land rises to form a predominantly wooded backdrop to the views.

6.0 OPPORTUNITIES AND CONSTRAINTS

6.1 The following landscape opportunities and constraints should be considered when developing a masterplan for residential development on the Site:

- Existing vegetation structure should be retained, reinforced and enhanced. Implement effective landscape management to ensure thinning, selective felling and replanting to achieve a varied age structure comprising locally indigenous species;
- Development should incorporate tree planting along the contours throughout the scheme, including along roads and within public open spaces within the Site to mitigate views from across the River Medway, in order to reduce the perception of the built form within the Site;
- Built form should follow the contours of the Site to reduce the cut and fill requirements;
- The amenity value of PRow RS220 along the northern edge of the Site should be enhanced, as currently it is a narrow corridor route, separated from the Site by scrub and scattered trees. Pockets of open space and more open views into the Site and the River Medway to the east should be introduced, with the potential for play areas incorporated within a parkland setting along this route; and
- The wider pedestrian connectivity locally should be enhanced, by introducing pedestrian connections between Pilgrims Way to the west of the Site and PRow RS220 to the north of the Site, through the Site.

7.0 GREEN BELT REVIEW

7.1 As illustrated on Figure 1: Site Context Plan much of the undeveloped land to the west of the River Medway, including the Site, is designated as Green Belt land. The Green Belt designation excludes land to the north and south of the Site (which comprises residential development), however, indiscriminately washes over residential properties adjoining the western edge of the Site, and other properties along Pilgrims Way.

7.2 Under National Planning Policy Framework (2012), Green Belt is a functional designation, its purpose being to prevent urban sprawl by keeping land permanently open and as such the essential characteristics of Green Belts are their openness and permanence. More specifically Green Belt serves the following five purposes:

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

7.3 The NPPF states that the key characteristics of the Green Belt are ‘their openness and their permanence,’ (paragraph 79).

7.4 The Site has been assessed in terms of the five purposes set out within the NPPF. In evaluating the contribution of the land to the Green Belt, the Green Belt function of the Site has been ranked within a series of levels or categories, indicating a gradation from none to significant. These thresholds are set out in Table 1 below, while Table 2 sets out an assessment of the Green Belt function of the Site.

Table 1: Contribution of Green Belt function categories

Table Heading	Assessment
Significant	Significant landscape and visual contribution towards purpose of Green Belt
Some	Some landscape and visual contribution towards purpose of Green Belt
Limited	Limited landscape and visual contribution towards purpose of Green Belt
Small	Small landscape and visual contribution towards purpose of Green Belt
None	No landscape and visual contribution towards purpose of Green Belt

- 7.5 An assessment has been made of the openness of the Green Belt in this particular location and to what extent the removal of the Site would have on the perception of openness in the remaining designated area.

Definitions

- 7.6 When considering the ability of the Site to meet each of the purposes of the Green Belt, the following definitions should be considered.

Sprawl

- 7.7 Disorganised and unattractive extension to developed area (perhaps lacking defensible boundary), spread out over a large area in an untidy or irregular way. This takes into account the local settlement pattern.

Encroachment

- 7.8 The gradual advancement of development beyond an acceptable or established limit. This takes into account the condition of the land within the Site and the value it contributes to Green Belt (countryside).

Defensible boundaries

- 7.9 The NPPF states that, when choosing boundaries, 'local authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent,' (paragraph 85).

Table 2: The Site's Contribution to the Purposes of the Green Belt

Green Belt Function	Assessment	Green Belt Contribution (None / Very Small / Limited / Some / Significant)
To check the unrestricted sprawl of large built-up areas	<p>The Site is enclosed and adjoined by residential development to the north, west and south and the A228 to the east, and therefore development on the Site would not result in sprawl, as is contained by development that surrounds it.</p> <p>There is an opportunity to reinforce the existing landscape structure through the enhancement of the landscape buffers around the Site, comprising native species hedgerows and trees, which would provide a defined edge to the development, whilst also contributing positively to local landscape character.</p> <p>Therefore, it is considered that the Site has the ability to absorb development without contributing to an increase in the extent of unrestricted sprawl of the</p>	None

Green Belt Function	Assessment	Green Belt Contribution (None / Very Small / Limited / Some / Significant)
	existing settlement pattern.	
To prevent neighbouring towns merging into one another	<p>Due to the urbanised nature of the lower valley slopes on the western side of the River Medway, there is no clear distinction between settlements locally.</p> <p>Policy BNE 30 of the Medway Local Plan states that the Metropolitan Green Belt has helped to maintain the open area between Medway and Gravesend, and the open area between London and other urban areas of Medway, Maidstone, Tunbridge Wells, Sevenoaks and Tonbridge. The geographic location of the Site is not applicable to these functions and cannot be described as 'open countryside'.</p>	None
To assist in safeguarding the countryside from encroachment	<p>The variety of land uses lead to an incoherent character locally with strong urban fringe characteristics, and as demonstrated in the visual appraisal section, visibility into the Site is limited and filtered due to intervening vegetation and built form, with the exception of the longer views from the east of the River Medway, from which the strong urban fringe character of this location is evident.</p> <p>As a result the contribution the Site makes to the 'openness' of Green Belt is limited.</p> <p>Furthermore, the perception of 'countryside' is further reduced by the presence of the fast-moving A228 road adjoining the eastern edge of the Site which is audibly intrusive.</p> <p>The introduction of development would result in the replacement of a field with built form, however, the effect would be perceived within a limited visual envelope, constrained by local topography, intervening vegetation and built form, and seen in the context of the Site's urbanised surroundings.</p>	Limited
To preserve the setting and special character of historic towns	The Site is not within, or visible from any historic towns, and is not within or visible from any Conservation Area. Therefore, the development of the Site would have no effect on the setting or character of any historic towns.	None

7.10 The fifth NPPF Green Belt function to assist in urban regeneration is not a landscape and visual consideration. Should the Site be brought forward for redevelopment, this would not prejudice derelict land coming forward in the future.

7.11 The above demonstrates that due to the urbanised context of the Site's surroundings, the Site makes little to no contribution to the purposes of Green Belt, and therefore that the Site could be released from the Green Belt, and residential development accommodated within the Site.

8.0 SUMMARY AND CONCLUSION

The Site and Context

- 8.1 The Site is located within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is within the Green Belt, however, is surrounded by residential properties on 3 sides including recent residential development to the south of the Site. The A228 and Pilgrims Road / Way provide connectivity to the residential settlements and various land uses along the valley. Beyond this to the west, land rises more steeply, forming a backdrop that is primarily wooded with exposed chalk scarps.
- 8.2 With the exception of being within the Green Belt, the Site is not subject to landscape-related or planning policy designations.
- 8.3 The Site is approximately 6.8 hectares in area. The Site is an unmanaged, sloping field which falls from 35m AOD in the south-west to 5m AOD in the south-east. It comprises a block of woodland in the south-eastern corner adjoining the A228 and an area of scrub / woodland the south-westernmost corner adjoining Pilgrims Road / Way. Pylons extend along the southern boundary of the Site, beyond which is the recently constructed residential development to the south of the Site ("St Andrews").

Landscape Character

- 8.4 The published landscape character assessments describe a predominantly chalk landscape, cut by deep valleys including the Medway Valley, where the upper slopes are typically well wooded. More locally, the Medway Valley is described as an incoherent landscape with wide, open views, and of poor condition. Guidelines include the creation of a strong landscape framework incorporating wide hedgerows and shaws to provide a network of semi-natural habitats, and screening development with appropriate native planting from footpaths, roads, existing settlements and rural areas.
- 8.5 The published assessments broadly reflect the local landscape character of the western edge of the River Medway, which is incoherent and of low sensitivity. At a site specific level, the Site is unmanaged and overgrown, however, does comprise two woodland blocks which should be retained and enhanced as part of any proposed development in accordance with the published guidelines. The guidelines were written prior to the construction of the recent residential development to the south of the Site, which replaced former employment uses.

Visual Appraisal

- 8.6 The Site Context Photographs which accompany this Appraisal demonstrate that the Site is partially visible from its immediate surroundings, however, views are typically filtered by intervening vegetation. More open views into the Site are obtained from land to the east of the River Medway, however, where these views are obtained, the Site is seen in an urbanised context of the lower slopes of the Medway Valley, beyond which land rises to form a predominantly wooded backdrop to the views.

Opportunities and Constraints

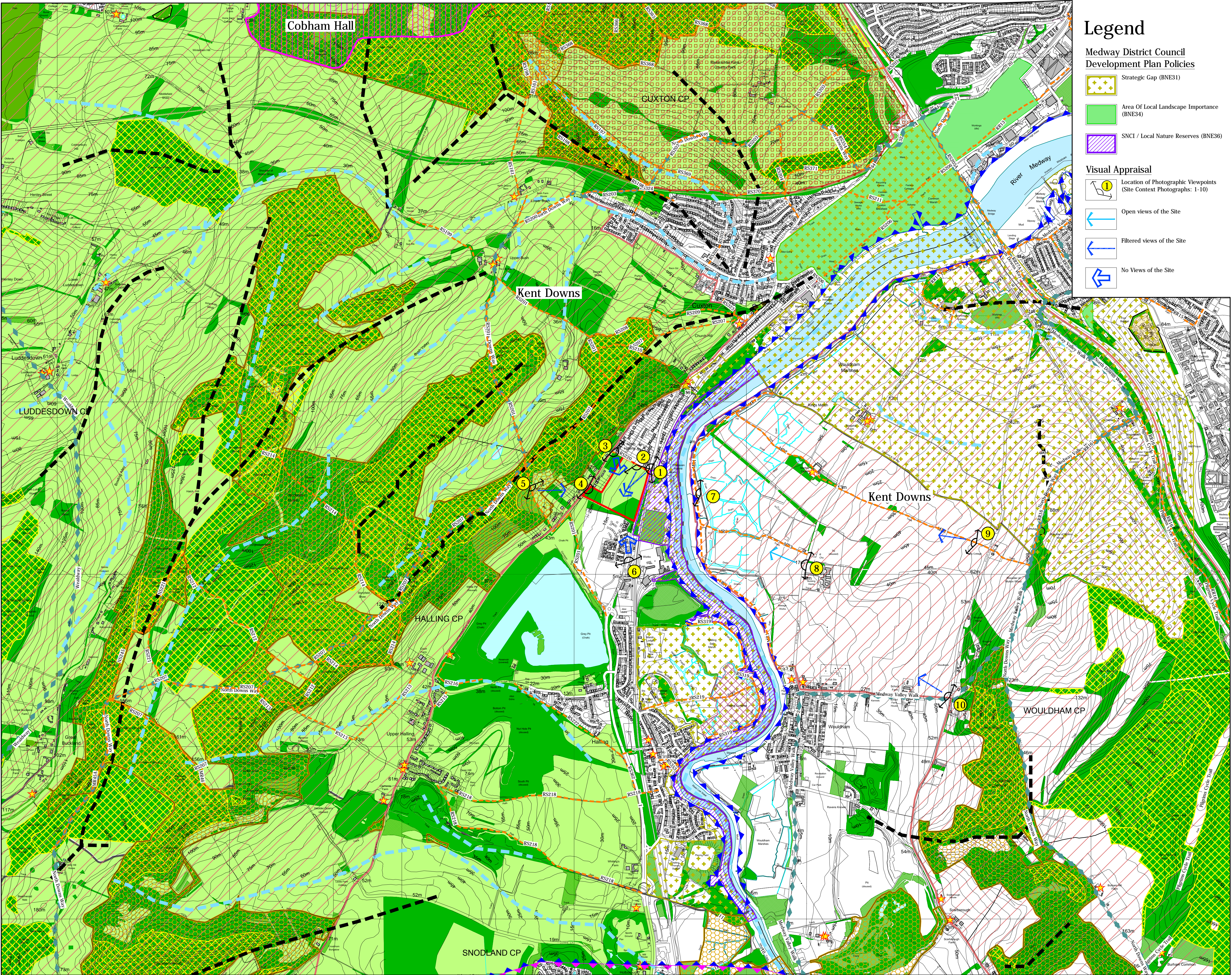
- 8.7 The following landscape opportunities and constraints should be taken into consideration when developing a masterplan for development on the Site, to help assimilate the development into the Site and its context:
- Retain and enhance existing vegetation including the woodland blocks within the Site to enhance visual amenity and biodiversity;
 - Incorporate tree planting throughout the scheme to reduce the perception of built form within the Site, particularly from the eastern side of the River Medway and ensure that development follows the contours of the Site;
 - Enhance the amenity value of the footpath (PRoW RS220) which adjoins the northern edge of the Site by introducing new pockets of open space and along the route and managing the vegetation to allow more open views towards the River Medway; and
 - Enhance local pedestrian connectivity, by incorporating new pedestrian routes through the Site from Pilgrims Road / Way in the south-west to PRoW RS220 in the north.

Green Belt Review

- 8.8 The Site has been assessed in terms of the five purposes set out within the NPPF. As demonstrated within the table in Section 7 of this Appraisal, the Site makes **no contribution** to checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns); makes a **limited contribution** to assisting in safeguarding the countryside from encroachment; and **would not prejudice** derelict land coming forward in future for development.
- 8.9 The above demonstrates that the Site could be released from the Green Belt, and residential development accommodated within the Site.

Conclusion

- 8.10 As a result of the above considerations it is concluded that sympathetic development within the Site would be acceptable in landscape and visual terms and would result in limited to no effect on the function of the Green Belt. The Site could successfully accommodate residential development, assimilated into the existing development pattern of its urbanised surroundings, which includes residential development on 3 sides of the Site.



Legend

Medway District Council Development Plan Policies

- Strategic Gap (BNE31)
- Area Of Local Landscape Importance (BNE34)
- SNCI / Local Nature Reserves (BNE36)

Visual Appraisal

- Location of Photographic Viewpoints (Site Context Photographs: 1-10)
- Open views of the Site
- Filtered views of the Site
- No Views of the Site

- The scaling of this drawing cannot be assured
- Revision Date Dm Ckd
- Site Boundary
- Existing Woodlands, Copses and Tree Belts ^
- Existing Water Courses and Features ^
- Contours/Spot Heights (Metres AOD) ^
- Ridgelines
- Valleys
- Public Rights of Way *
- Distance Walks #
- Listed Buildings ~
- Scheduled Monument ~
- Registered Parks and Gardens
Cobham Hall
- Ancient Woodland #
- Area of Outstanding Natural Beauty
Kent Downs
- Green Belt ^^
- Countryside Rights of Way Access Areas
- Sites of Special Scientific Interest
- Country Park
- National Character Area Profiles #
- 119: North Downs
(The Site is within this NCA)
- 120: Wealden Greensand

Sources:

- GIS Mapping
- Natural England GIS Data Set
- Historic England National Monument Record GIS Data Set
- Medway Deftable Map
- Sustrans National Cycle Network GIS Data
- Department for Communities and Local Government GIS Data

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

Figure 1

Project
North Field,
Halling, Kent
Drawing Title
Site Context Plan

Date 08.12.2015	Scale 1:10,000 @A1 1:20,000 @A3	Drawn by ZR	Check by ET
Project No 23486	Drawing No L1		Revision -



The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-

LEGEND

Site Boundary

Existing Water Courses and Features ^

Contours/Spot Heights (Metres AOD) ^

Public Rights of Way *

Location of Photographic Viewpoints (Site Appraisal Photographs: A-C)

Sources:

^

 OS Mapping

*

 Meadway Definitive Map

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

Figure 2

Project
North Field,
Halling, Kent
Drawing Title
Aerial Plan of Site

Date	Scale	Drawn by	Check by
08.12.2015	1:2,000 @A3	ZR	ET
Project No	Drawing No	Revision	
23486	L2	-	

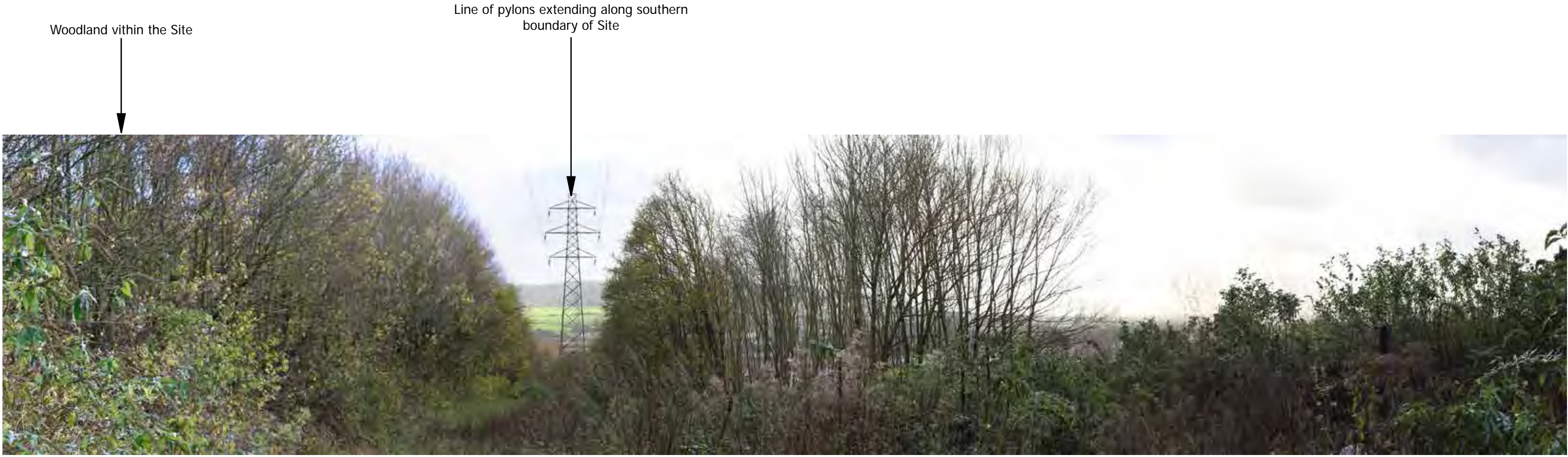
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SITE APPRAISAL PHOTOGRAPH A : VIEW FROM SOUTH-WESTERN PART OF SITE, LOOKING SOUTH-EAST

Date Taken: November 2015



SITE APPRAISAL PHOTOGRAPH B : VIEW SOUTH FROM SITE TOWARDS FORMER CEMENT WORKS AND ADJOINING RESIDENTIAL DEVELOPMENT (DURING CONSTRUCTION)

Date Taken: March 2014



SITE APPRAISAL PHOTOGRAPH C : VIEW FROM THE NORTHERN BOUNDARY OF THE SITE, LOOKING SOUTH-EAST

Date Taken: March 2015

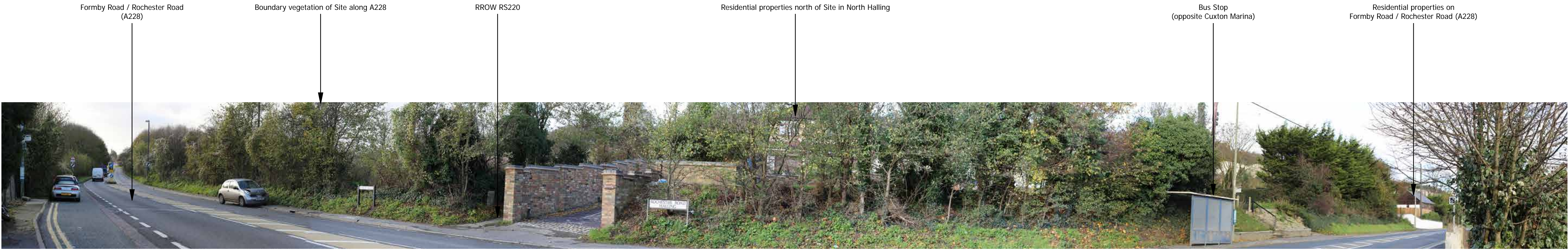
**NORTH FIELD,
HALLING, KENT**

**SITE APPRAISAL
PHOTOGRAPHS: A - C**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

PROJECT NUMBER: 23486

**BARTON
WILLMORE**



SITE CONTEXT PHOTOGRAPH 1: VIEW FROM ROCHESTER ROAD/ FORMBY ROAD (A228), LOOKING WEST

Distance: 19m



SITE CONTEXT PHOTOGRAPH 2: VIEW FROM PROW RS220

Distance: 2m



SITE CONTEXT PHOTOGRAPH 3: VIEW FROM PILGRIMS ROAD / WAY, LOOKING SOUTH-EAST

Distance: 71m

**NORTH FIELD,
HALLING, KENT**

**SITE CONTEXT
PHOTOGRAPHS: 1 - 3**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

DATE TAKEN: NOV 2015

PROJECT NUMBER: 23486

**BARTON
WILLMORE**



SITE CONTEXT PHOTOGRAPH 4: VIEW FROM PILGRIMS ROAD / WAY, LOOKING EAST

Distance: 5m



SITE CONTEXT PHOTOGRAPH 5: VIEW FROM PROW RS201, LOOKING EAST

Distance: 310m



SITE CONTEXT PHOTOGRAPH 6: VIEW FROM FORMBY ROAD / ROCHESTER ROAD (A228), LOOKING NORTH

Distance: 240m

**NORTH FIELD,
HALLING, KENT**

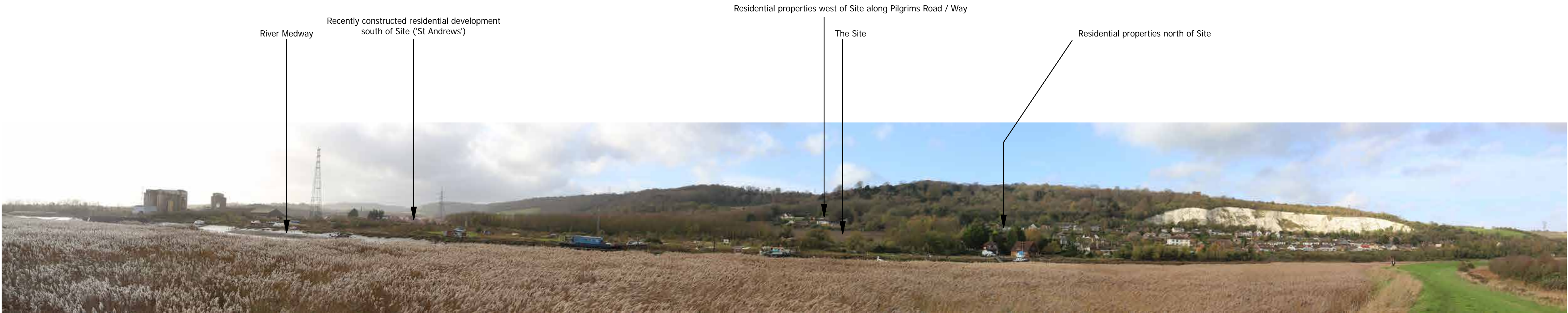
**SITE CONTEXT
PHOTOGRAPHS: 4 - 6**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

DATE TAKEN: NOV 2015

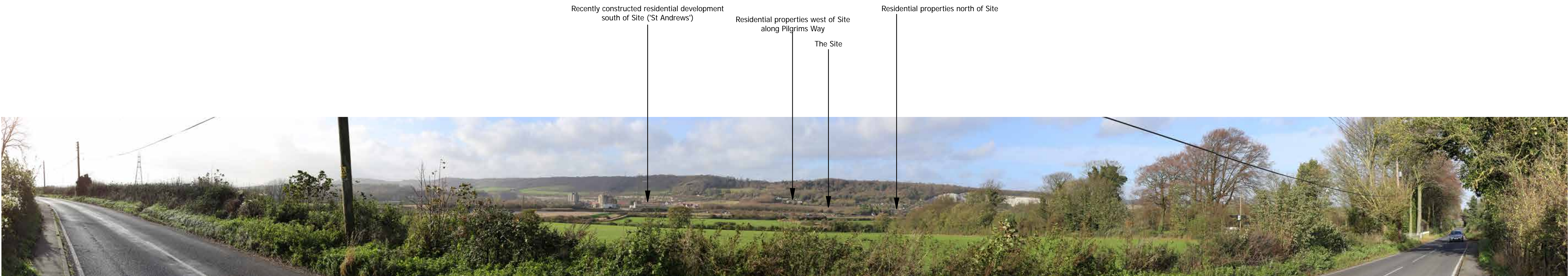
PROJECT NUMBER: 23486

**BARTON
WILLMORE**



SITE CONTEXT PHOTOGRAPH 7: VIEW FROM AONB (KENTS DOWNS), LOOKING WEST

Distance: 327m



SITE CONTEXT PHOTOGRAPH 8: VIEW FROM WOULDHAM ROAD, LOOKING NORTH-WEST

Distance: 1.03km



SITE CONTEXT PHOTOGRAPH 9: VIEW FROM PROW/MR2, LOOKING WEST

Distance: 1.95km

**NORTH FIELD,
HALLING, KENT**

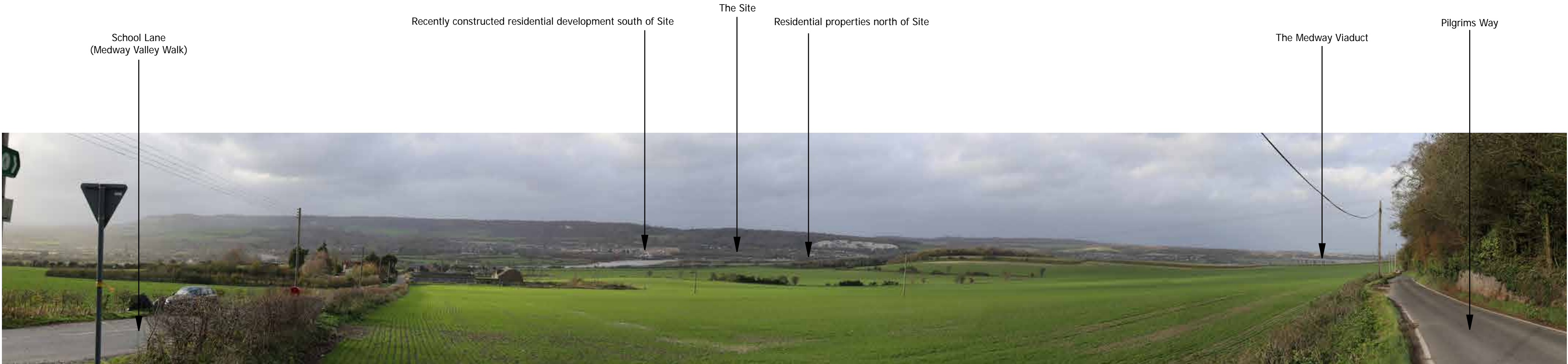
**SITE CONTEXT
PHOTOGRAPHS: 7 - 9**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

DATE TAKEN: NOV 2015

PROJECT NUMBER: 23486

**BARTON
WILLMORE**




SITE CONTEXT PHOTOGRAPH 10: VIEW FROM PILGRIMS WAY, LOOKING NORTH-WEST
Distance: 2.1m

APPENDIX 3

SLAA Extract

**North Field, Halling – Site Proforma
(Medway Council, November 2015)**

Site	
Reference	352
Address	North Field, Halling
Description	Site is located adjacent to the new housing development of St Andrews Park and is identified within the planning application for St Andrews Park as an area of open space. The site slopes gently to the south-east and is bounded by a number of mature trees. Much of the site is overgrown. Access could be created through the St Andrews Park development or onto Formby Road.
Size (ha)	6.65 (part of wider site 80.79 with Planning Permission)
Relevant policy guidance	-
Location Plan	

Development Potential		
Residential (units)	193	
Employment (m ²)	Office	66,500
	Industrial	26,600
	Storage	26,600
Main Town Centre Uses (m ²)		
Other Uses		

Suitability - General		
Facilities & Services Accessibility	Site has moderate access to services and facilities.	
Public Transport	Site has moderate access to public	

Suitability - General		
Accessibility	transport opportunities.	
Highway Network Capacity	<p>Access to the strategic highway network (M2/A2), and around the Medway urban distributor network generally, is likely to be constrained by a number of identified congestion hotspots.</p> <p>Whilst it is possible that strategic infrastructure upgrades may address these congestion issues, improving capacity on the network, there are no upgrades planned or identified at present.</p> <p>Further detailed assessment would need to be undertaken (as part of the Local Plan or development management process) to demonstrate how traffic generated by the development could be accommodated on the network.</p> <p>Developer contributions may be required to fund any infrastructure upgrades necessary to address network capacity constraints.</p>	
Site Access	<p>It is likely a suitable vehicular access could be created on to Formby Road, which is directly adjacent to the site.</p> <p>Notwithstanding the above, the suitability of the prospective access would need to be further investigated through the Development Management Process.</p>	
Ecological Potential	<p>An ecological survey of the site has not been investigated as part of this high level assessment and as such the presence or absence of protected species and/or habitats cannot be established at this stage.</p> <p>Further assessment would therefore need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.</p>	
Designated Habitats	Natural England guidance (Impact Risk Zones) indicates that development of this site poses a potential risk to a SSSI.	

Suitability - General		
	Further assessment of the potential impacts of development upon designated habitats would therefore need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.	
Landscape	<p>Whilst the site is situated outside of the built up area, the landscape is considered less sensitive and to have some potential to accommodate change.</p> <p>Further assessment of the potential impacts of development upon the local landscape would need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.</p>	
Heritage	Development is unlikely to have an impact upon any designated heritage assets.	
Air Quality	Site is unlikely to be constrained by air pollution.	
Contamination	Contamination is not suspected on the site.	
Site Developability	The site is free from known development 'abnormals'.	
Agricultural Land	Site is on the edge of a built up area and development would not result in the loss of any agricultural land.	
Open Space	Site is not designated open space, however it has been identified in planning application MC/12/1791 (neighbouring development) as an informal open space, trim trail and pedestrian footpaths.	

Suitability – Housing		
Flood Risk	Site is at low risk of flooding.	
Noise	Noise pollution may affect the site, but it is likely that this could be mitigated.	
Amenity/Overlooking	<p>The site has the potential to impact upon amenity of nearby residential properties.</p> <p>Whilst this is likely to be resolvable through sensitive design, it is likely this would have implication for site capacity.</p>	
Employment Land	Site is not designated employment land.	

Overall	Whilst the site is subject to some potential development constraints, it is considered that these could be resolved, subject to further assessment.	
----------------	--	--

Suitability – Economic Development

Flood Risk	Level of flood risk on the site is considered acceptable for commercial uses.	
Noise	The site may be affected by noise pollution, but it is likely that this could be mitigated for commercial uses.	
Amenity	Mainly residential with few commercial uses.	
Overall	Whilst the site is subject to some potential development constraints, it is considered that these could be resolved, subject to further assessment.	

Suitability – Mixed Use

Overall	Whilst the site is subject to some potential development constraints, it is considered that these could be resolved, subject to further assessment.	
----------------	--	--

Availability

Landowner is actively promoting the site for redevelopment.	
A SLAA submission has been received for the site – housing.	

APPENDIX 3

Representations to Medway Council Local Plan Issues and Options Consultation (February 2016)

Representations to Medway Council Local Plan

Issues & Options 2012 – 2035 Consultation Document

SUBMITTED ON BEHALF OF
REDROW HOMES (SOUTH EAST)

February 2016

REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN

ISSUES & OPTIONS

2012 – 2035

CONSULTATION DOCUMENT

**SUBMITTED ON BEHALF OF
REDROW HOMES (SOUTH EAST)**

Project Ref:	23486/A5/HH
Status:	Final
Issue/Rev:	02
Date:	29 February 2016
Prepared by:	Hardeep Hunjan
Checked by:	Andrew Wilford
Authorised by:	Andrew Wilford

Barton Willmore LLP
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

Tel: [REDACTED]
Fax: [REDACTED]
E-mail: [REDACTED]

Ref: 23486/A5/HH/AW/kf/mg
Date: 29 February 2016

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APPENDICES

Appendix 1:	North Field, Halling Site Location Plan
Appendix 2:	Objective Assessment of Housing Need: Critical Review (Barton Willmore, February 2016)
Appendix 3:	Barton Willmore The North Field, Halling: Landscape Appraisal and Green Belt Review (Barton Willmore, February 2016)

1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Redrow Homes (South East) in response to Medway Council's Local Plan Issues and Options 2012 – 2035 Consultation Document (MCIOCD) published in January 2016. As a landowner within Medway, Redrow Homes has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 1.2 These representations focus on promoting Redrow Homes' site known as 'The North Field, Halling' (The Site). A Site Location Plan is included at **Appendix 1**.
- 1.3 The Site forms part of the wider St. Andrew's Park Development which is currently being built out by Redrow Homes (hybrid planning application reference: MC/12/1791) for 385 dwellings and associated mix of uses. The Site currently lies within the Green Belt.
- 1.4 The Site is identified in the Medway SLAA 2015 (site reference 352) with the potential to deliver up to 50 dwellings. The Site comprises 6.84ha and is bound by residential development to the north, west and south. The A228 runs directly to the east of the site.
- 1.5 The Site itself is currently an unmanaged, sloping field with land rising from east to west, comprising a block of woodland in the southern corner adjoining the A228 and an area of scrub/woodland to the south-western corner adjoining Pilgrims Way/Road. A low voltage (33kv) overhead powerline crosses from west to east on the southern edge of the Site.
- 1.6 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework [NPPF] (March 2012), National Planning Practice Guidance [NPPG] (March 2014), the Consultation on Proposed Changes to National Planning Policy [CPCNPP] (December 2015) and The Rural Productivity Plan [RPP] (August 2015).
- 1.7 The MCIOCD advises that the current consultation is in advance of the preparation of a new Local Plan, and therefore is not a formal Regulation stage under the Town and Country Planning (Local Planning) Regulation 2012 ('the Local Planning Regulations'). The Local Development Scheme 2015 – 2018 (November 2015) anticipates that a "Preferred Options" consultation will be undertaken in January to February 2017, forming the first formal stage in the Local Plan's preparation (under Regulation 18 of the Local Plan Regulations).

- 1.8 Whilst the consultation is welcomed, it should be recognised that the MCIOCD does not contain any detailed policies or identify specific development sites (excluding reference to the unknown outcome of Lodge Hill) that can be assessed, and therefore due to the “broad” nature of the questions posed, the benefit of the consultation responses to MC will be limited in this regard.
- 1.9 In addition, the MCIOCD has not been accompanied by a suite of Evidence base documents that should inform the production of a new Local Plan. Indeed, the Strategic Housing and Economic Needs Assessment (SHENA) was not made publicly available until 19 February 2016, i.e. 6-weeks from the start of the consultation period, and 1 week from its close.
- 1.10 These representations focus on relevant matters and/or specific questions relating to the release of the Site for residential dwellings and address the following chapters:
- Housing (MCIOCD Questions 4 – 14);
 - Environment (MCIOCD Questions 30 - 32);
 - Rural Issues (MCIOCD Questions 38 – 42)
 - Deliverability (MCIOCD Questions 76 - 79);
 - Development Strategy (MCIOCD Questions 80 – 87).
- 1.11 We recognise that this consultation document is at the early stages of the Local Plan preparation and therefore further evidence and consultation will provide for greater clarity on a number of areas.
- 1.12 Alongside the Consultation Document, Medway Council has prepared a number of supporting Evidence Base documents. We do not seek to assess each one in detail, but draw upon:
- North Kent SHENA (March 2016)
 - The SLAA (November 2015)
 - Authority Monitoring Report (December 2015) which sets out how MC will fulfil its ‘Duty to Co-operate with neighbouring LPAs and Public Bodies.
 - North Kent SHMA (November 2015)

i) Barton Willmore Supporting Evidence

- 1.13 In addition to commenting on specific questions, these representations are supported by technical reports that demonstrate that the release of the Site from the Green Belt is appropriate and that there is a requirement to undertake a Green Belt review in order to meet the full OAN housing target.

- 1.14 Barton Willmore Research has undertaken a critique of the published SHENA entitled *Objectively Assessed Housing Need Medway Unitary Authority* (included at **Appendix 2**). It is a standalone document and assesses the housing requirements put forward within the MCIOCD and determines the soundness of the objectively assessed needs within Medway.
- 1.15 Barton Willmore Landscape Planning and Design has prepared a *Landscape Appraisal and Green Belt Review* (included at **Appendix 3**). The Report provides a Landscape and Visual Appraisal of the Site and assess the Site's contribution to the purposes of the Green Belt, in-line with National and Local planning policy.
- 1.16 The supporting Reports demonstrate that there are concerns with the identified OAN housing target and that a higher housing figure should be pursued as at present it is considered that this is unsound. In any event, there is a need for a Green Belt review (notwithstanding the required uplift) and the supporting information demonstrates that the Site is appropriate to be released as part of a small scale Green Belt review in this location.
- 1.17 The release of the Site will provide housing to be delivered in this rural part of Medway and sit alongside recently constructed development that will complement the St. Andrew's Park development and contribute to the character of Medway in this location.

2.0 NATIONAL PLANNING POLICY

i) National Policy & Plan Making

2.1 The NPPF (March 2012) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:-

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

(Para. 8)

2.2 The presumption in favour of sustainable development, as set out in the NPPF should be seen as a golden thread, running through both plan-making and decision-taking. For plan-making this means that:

- Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted.

(Para. 14).

2.3 LPAs should 'submit a plan for examination which it considers is "sound" – namely that 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 NPPF.
(Para. 182).

2.4 The NPPF considers that Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified. (Para. 157).

- 2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. (Para. 158).

ii) National Policy & Housing Need

- 2.6 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, 'Objectively Assessed Needs' (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.
- 2.7 LPAs should plan for a housing mix which takes into account "housing demand and the scale of housing supply necessary to meet this demand." Household and population projections should also be a key consideration, taking into account of migration and demographic change. (Para. 159).
- 2.8 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.

(Reference ID: 2a-015-20140306)

- 2.9 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

(Reference ID: 2a-015-20140306)

- 2.10 The Consultation on Proposed Changes to National Planning Policy (CPCNPP) (December, 2015) reaffirms the Government's commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.

iii) Duty to Co-operate

- 2.11 The 'Duty to Co-operate' between LPAs is a clear requirement of National planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in para. 156. (Para. 178).
- 2.12 In addition, para. 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged. (Para. 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-operate during the plan-making process. (Para. 181).

iv) Government guidance on Green Belt

- 2.13 In September 2012, the Communities Secretary of State issued a Ministerial Statement covering housing and growth. The Statement, amongst other matters, recognises the importance of protecting the Green Belt against urban sprawl whilst also acknowledging that LPAs can review local designations through plan-making, where appropriate to do so, to promote growth. The Statement notes that:

"We encourage councils to use the flexibilities set out in the National Planning Policy Framework to tailor the extent of Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered in reviewing or drawing up local plans, we will support councils to move quickly through the process by prioritising their Local Plan examinations... There is considerable previously developed land in many Green Belt areas, which could be put to more productive use. We encourage councils to make best use of this land, whilst protecting the openness of the Green Belt in line with the requirements in the National Planning Policy Framework."

- 2.14 The Government recognises that Green Belt reviews can support growth under local circumstances.

3.0 HOUSING

"Q.4 Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?"

- 3.1 We do not consider that the approach and conclusions derived from MCIOCD, assessing the housing needs calculated for Medway over the plan period have been appropriately assessed. We do not consider that the assessed housing need, as calculated by MC is "sound" and in line with National planning policy.
- 3.2 The NPPF directs LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of sites. (Para 159).
- 3.3 MC has jointly produced a North Kent SHENA (March 2015) with Gravesham Borough Council and a North Kent SHMA (November 2015).
- 3.4 The North Kent SHENA identifies the OAN for Medway as being 1,281 dwellings per annum (dpa) over the period 2012-2037 based on the result of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates. This level of housing need has been taken forward in MCIOCD to cover the period 2012-2035.
- 3.5 An assessment of MCs objectively assessed need housing figure has been carried out by Barton Willmore's Research Team and is included at **Appendix 2**.
- 3.6 The Report has been prepared in accordance with the requirements of the NPPF, to ensure that the Local Plan of each Local Planning Authority meets the full, objectively assessed needs for market and affordable housing in the housing market area.
- 3.7 In summary, the Report critiques the OAN of 1,281 dpa derived from MC and does not consider it to represent an accurate representation of the full OAN for Medway over the Plan period (2012 – 2035) for the following reasons:
 - There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dwellings per annum, 2012-2035;

- The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The North Kent SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are 'positively prepared' an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;
- The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very minimum projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;
- The North Kent SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The North Kent SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined above we believe to be inappropriate;
- The North Kent SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The North Kent SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The North Kent SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the North Kent SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The North Kent SHENA and MCIOCD identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the North Kent SHENA does not address the significant affordable housing need in Medway.

- 3.8 The MCIOCD identifies an OAN of 29,463 dwellings over the period 2012-2035. This figure is below the level of need identified by the CLG 2012-based household projections which identifies 30,429 dwellings over the same period. The PPG states that the CLG figure should be used as the 'starting point' estimate of need. The 'starting point' usually requires adjustment to address suppressed household formation and suppressed migration trends.
- 3.9 In addition, the CPCNPP indicates that CLG are intending to amend National planning policy to ensure appropriate action is taken where there is a significant shortfall between the homes provided for in Local Plans and the houses being constructed. A housing delivery test is proposed (as outlined in the Spending Review and Autumn Statement 2015) (HM Treasury, November 2015). It is envisaged that this approach would compare the number of homes that LPAs set out to deliver in their Local Plan against the net additions in housing supply within the LPA area. Consequently, LPAs shall have to ensure that OAN figures are suitably robust and achievable in line with current National planning policy and the emphasis that is being placed on delivery rates with the CPCNPP. (Para. 30).
- 3.10 The CPCNPP considers that continued significant under-delivery of housing, identified over a sustained period should be addressed by appropriate action. The CPCNPP considers that one approach to address under-delivery rates could be to identify additional sustainable sites if it has been shown that the existing approach is not delivering the housing required. Such sites would need to be in sustainable locations, with appropriate infrastructure available and which can be demonstrated as deliverable. To deliver such an approach, it is recognised that collaboration between developers and local communities, undertaking appropriate consultations would be required to undertake policy reviews, enabling additional land in sustainable locations to come forward. (Paras. 31 – 33).
- 3.11 Overall, it is considered that the MCIOCD does not seek to meet the Full OAN for Medway which is considered to be in the region of **1,489dpa**. This matter should be addressed in the next iteration of the Local Plan as the current position is considered to be unsound.

"Q.5 What do you consider to be the appropriate housing market area for Medway?"

- 3.12 The SHMA (November 2015) defines the Housing Market Area to comprise Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling.
- 3.13 MC should seek to work collaboratively under the 'Duty to Co-operate' to address the housing needs of neighbouring authorities and how housing can be delivered in part of the HMA that are influenced by neighbouring Districts.

"Q.6 Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?"

- 3.14 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012 – 2037), the Local Plan period (2012 – 2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744dpa), which would constitute 58% of MC's identified OAN figure of 1,281dpa. The PPG advises that an increase in the total Local Plan housing figure should be considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).
- 3.15 The need for affordable housing nevertheless, should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."* (Para. 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing when taking account of the normal cost of development and mitigation, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 3.16 We would consider that in light of the highlighted need for affordable housing provision as identified in the North Kent SHMA (November 2015), seeking the provision of up to 25% affordable housing is appropriate.

Q.7 – 14 – No comments

4.0 RURAL ISSUES

Q. 38 -39 – No comment.

"Q.40 How should the Local Plan address the need to maintain and improve access to services in rural areas?"

- 4.1 It is acknowledged that rural areas face a number of challenges including accessibility to services. We consider that new development within rural areas should provide some form of contribution to maintaining and improving rural areas, where appropriate. The LPA should identify services in rural areas that are in need of improvement in order to facilitate future development needs.

"Q.41 What consideration should be given to strategic infrastructure and development in rural Medway?"

- 4.2 The PPG recognises that *"A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities."* (Reference ID: 50-001-20140306)
- 4.3 Improving strategic infrastructure and development in rural Medway is considered to be vital to support sustainable rural communities. Development in rural areas faces a number of barriers which are either unique to rural locations or experienced to a greater extent than development in other areas of Kent and Medway. Emerging local planning policy should ensure that the ongoing viability of rural areas is maintained with the provision of sufficient infrastructure including public transport and educational facilities to support future growth.
- 4.4 We consider that MC should work closely with key stakeholders to develop appropriate policy to support the vitality of rural areas.
- 4.5 The Department for Environment Food & Rural Affairs published The Rural Productivity Plan (RPP) in August 2015. Amongst other matters, it highlights the Government's intention to provide more housing in rural areas. The Plan notes that *"through the right combination of measures, the government wants to ensure that any village in England has the freedom to expand in an incremental way, subject to local agreement."* (Pg 6)

- 4.6 This indicates that strong local policy support for the location of new development and related infrastructure should be provided in line with Government guidance and within the context of the identified local requirement.

"Q 42 How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?"

- 4.7 Delivery of new homes within rural areas of Kent and Medway presents a further challenge. Historically, assessment of housing need in rural areas has been identified by MC as a key issue and MC has previously identified localised needs through parish Housing Need Surveys, undertaken by the Kent rural housing enabler. Where local needs are identified, this leads to a process of identifying land to deliver affordable rural housing. But there are significant issues with delivery and the costs involved tend to be higher than development in other areas.
- 4.8 The Site, in conjunction with the development at St. Andrew's Park, would offer a mix of uses, supporting the residential development on the Site and benefiting the wider area. Furthermore, the St. Andrew's development will provide a range of community infrastructure facilities, supporting a thriving rural community. The development would also serve to meet the needs of other housing market areas, supporting MCs 'duty to co-operate' with neighbouring LPAs.
- 4.9 The RPP states that *"the government will make it easier for villages to establish neighbourhood plans and allocate land for new homes, including the use of rural exception sites to deliver Starter Homes."* (Para. 8)
- 4.10 In February 2016, Government issued a Rural Planning Review: Call for Evidence (RPRCFE) following on from the RPP. It recognises the importance of ensuring the sustainability of rural areas and sets out to investigate evidence in practice regarding the effectiveness of the current planning system for businesses in the rural context.
- 4.11 Both the RPP and RPRCFE set out the Government's intention to promote sustainable growth and ensure the viability of rural areas.

5.0 DELIVERABILITY

Q.76, 78 – 79 – No comment

"Q.77 Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?"

- 5.1 We consider that it is appropriate to set different rates of affordable housing and CIL contributions to take into account differing viability between areas of Medway.
- 5.2 The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."* (Para. 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing when taking account of the normal cost of development and mitigation, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

6.0 DEVELOPMENT STRATEGY – OVERARCHING

Q.80, 83, 85 – 87 – No comment.

"Q.81 Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?"

- 6.1 We consider that a range of development types, as outlined within MCIOCD should be utilised in meeting Medway's growth requirements. This should be based on an overarching vision of sustainable development, as underpinned by National and Local planning policy. When selecting development types, it is important to consider the aspirations of National and Local policy.

- 6.2 The NPPF encourages LPAs in plan-making to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Whilst planning for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, LPAs should identify the range of housing that is required in particular locations. (Para. 50).

- 6.3 Furthermore, we refer to our Clients Site located in Halling, which is classified as a rural area within the settlement hierarchy. National policy supports sustainable development in rural areas, encouraging housing to be located where it will enhance or maintain the vitality of rural communities. Additionally, the NPPF directs that LPAs should be responsive to local circumstances and plan housing development to reflect local needs. (Para. 54 - 55).

- 6.4 The CPCNPP considers that *"building new homes on small sites, whether in rural or urban locations, can deliver a range of economic and social benefits."* Amongst other matters, this includes creating local jobs and sustaining local growth, particularly in rural areas and making effective use of developable land. (Para. 23).

7.0 DEVELOPMENT STRATEGY – GREEN BELT REVIEW

"Q.84 Should the green belt boundary be reviewed?"

- 7.1 We would support a review of the Green Belt boundary to assess the development potential of land that does not meet the five purposes of the Green Belt as set out in the NPPF. This is especially in the light of the required housing numbers.
- 7.2 The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. There are five key purposes of the Green Belt, including: -
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- (Paras 79-80)
- 7.3 The NPPF considers that LPAs with Green Belts in their area should establish Green Belt boundaries in their Local Plans, setting the framework for Green Belt and settlement policy. It is recognised that Green Belt boundaries that have been established should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. LPAs should take a long term view of the permanence of Green Belt boundaries beyond the plan period.
- 7.4 The NPPF states that LPAs should take into account the need to promote sustainable patterns of development when reviewing Green Belt boundaries. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Inappropriate development within the Green Belt is considered harmful and should not be approved except in very special circumstances. This includes the construction of buildings unless they meet certain criteria which do not have a harmful impact on the openness of the Green Belt. (Paras. 79 - 92)

- 7.5 As previously stated, our Client is promoting the release of the Site from the Green Belt with the potential to develop the southern section of the Site for residential development (as shown on **Appendix 1**). It is intended that a 'green wedge' could be created to the northern section, maintaining a separation between the settlement boundaries of Halling and North Halling. A Landscape Appraisal and Green Belt Review has been carried out by Barton Willmore's Landscape Team and is included at **Appendix 3**. The Report provides a Landscape and Visual Appraisal of the Site to assess the Site's contribution to the purposes of the Green Belt, in-line with National and Local planning policy.
- 7.6 The Site is set within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is bounded by residential properties to the north, west and south, with Formby Road located adjacent to the east of the Site. It is acknowledged that the Site is within the Green Belt, however, it is not subject to any other landscape-related or planning policy designations.
- 7.7 A small localised release of Green Belt land is proposed and allocation for residential development on part of the Site.
- 7.8 A Visual Appraisal of the Site was undertaken which demonstrates that the Site is *"partially visible from its immediate surroundings, however, views are typically filtered by intervening vegetation. More open views into the Site are obtained from land to the east of the River Medway, however, where these views are obtained, the Site is seen in an urbanised context of the lower slopes of the Medway Valley, beyond which land rises to form a predominantly wooded backdrop to the views."* (Para. 8.6).
- 7.9 The review of the Green Belt functions of the Site, as set out in the NPPF, indicates that *"the Site makes **no contribution** to checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns; makes a **limited contribution** to assisting in safeguarding the countryside from encroachment; and **would not prejudice** derelict land coming forward in future for development."* (Para. 8.8). In this case, we would consider that a localised review of the Green Belt is wholly justified bearing in mind the analysis of the merits of Green Belt functions as set out in the NPPF.
- 7.10 The Report concludes that releasing land from the Green Belt in this area would not cause any significant harm to Green Belt purposes and serve to rationalise the Green Belt boundary. Furthermore, by undertaking a Landscape and Visual Appraisal of the Site, the Report concludes that sympathetic development within the Site would be acceptable in landscape and visual terms and would result in limited to no effect on the function of the Green Belt.

8.0 OPEN SPACE

Q.49 -52, 53 – No comment.

"Q.52 Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?"

- 8.1 We consider that open space provision for new development should take a balance between the two approaches. The provision of on-site open space should be considered within the context of each development site, assessing the potential feasibility of a development site to provide for on-site open space provision or whether contributions towards maintaining and enhancing the existing estate is deemed more appropriate.

9.0 ENVIRONMENT

"Q.30 What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?"

- 9.1 We would consider that one of the ways in which MC could strike a balance between securing and strengthening Medway's environment and addressing the area's development needs would be to review those areas of land within Medway that do not serve the functions of the Green Belt as outlined with the NPPF (para. 80) and that do not have a detrimental impact on the environment.
- 9.2 This would prioritise sustainable development on appropriate land throughout Medway and can include Green Belt land as this may have benefits over other environmentally sensitive designations.
- 9.3 In this instance, a localised review of the Green Belt for the Site is considered to fulfil this sustainability credential.

Q.31 – 32 – No comment

10.0 SITE SUITABILITY

10.1 The Site was put forward to MC's 'call for sites' Strategic Land Availability Assessment in May 2014. The SLAA sets out to identify sites with development potential and the methodology undertaken enabled MC to carry out Stage 1 (Site Identification) and Stage 2 (Site Assessment) of the Planning Policy Guidance methodology. As part of the Stage 1 process, a number of sites were excluded for further assessment if they were constrained by a range of restrictive designations as identified within the NPPF (Footnote 9). This included sites within the Green Belt, resulting in North Field, Halling being one such site which was excluded and deemed unsuitable for development due to its Green Belt designation.

10.2 The SLAA recognises that;

"given the scale of development needs that Council must accommodate over the Plan Period, it was considered appropriate and robust that Green Belt land should be subject to detailed assessment at stage 2. However, whilst Green Belt land has been assessed at stage 2, this does not comprise a Green Belt Review. The Council intends to undertake a Green Belt review separately as part of the Local Plan evidence base; this will specifically consider whether land performs Green Belt functions and meets Green Belt purposes, rather than simply whether a site is suitable for development." (2015;13)

10.3 We would consider it appropriate that when such a review of the Green Belt is undertaken to meet OAN requirements, the SLAA would be updated to reflect this changing circumstance.

10.4 We consider that the Site is suitable for localised Green Belt release and demonstrates potential for development. Currently, the whole Site lies within designated Green Belt land and we consider that a robust case has been made to release the Site from the Green Belt, creating a logical extension of St Andrews Park as well as establishing a green wedge between the settlements, maintaining their separation.

10.5 The Site is located within a sustainable location, adjacent to the St. Andrew's Park development which will deliver a range of infrastructure and services. The Site is accessible, located adjacent to the local road network with access proposed directly onto the A228 and also served by local bus routes. Furthermore, the Site is located in close proximity to the strategic highway network and railway with the M2 located approximately 1 mile to the north of the Site and Halling railway station approximately 850 metres to the south of the Site. Pedestrian access to the railway station will be via the pedestrian footbridge, delivered as part of the St. Andrew's Park development.

- 10.6 The development would meet the three elements of sustainable development, as set out in the NPPF (para 7). Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has deliverable potential to contribute towards much needed housing within rural Medway and would deliver a mix of housing types, including an element of affordable housing.
- 10.7 The proposed provision of a green wedge to the northern part of the Site would enable further ecological enhancements, as well as landscaping delivered in line with potential development of the Site.
- 10.8 The Site is considered 'deliverable' in that it meets the requirements of footnote 11 of the NPPF and it has been demonstrated that the Site currently available for development, will offer a suitable location for development and has a realistic prospect of housing being delivered on the Site within five years and that development of the Site is viable.

11.0 CONCLUSIONS

- 11.1 These representations are submitted on behalf of Redrow Homes who has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 11.2 These representations focus on promoting Redrow Homes' site known as 'The North Field, Halling'. The Site forms part of the wider St. Andrew's Park Development which is currently being built out by Redrow Homes. The Site currently lies within the Green Belt.
- 11.3 The representations are supported by technical reports in respect of Objectively Assessed Needs and a Green Belt review.
- 11.4 We do not consider that the OAN target of 1,281dpa is sound. It falls short of the starting point estimate and once other factors are taken into consideration, could be as high as 1,489dpa. This matter should be addressed during the next iteration of the Local Plan and ensure that there are sufficient housing sites allocated to meet the Full OAN.
- 11.5 We consider the site is suitable to be released from the Green Belt under a localised Green Belt review in this location. It would form a logical extension to the under construction St Andrews Park and would maintain separation between Halling and North Halling. Furthermore, development in this location would serve to deliver houses in this rural part of Medway that has other Housing Market Area influences upon it (from Tonbridge and Malling and Maidstone).
- 11.6 In addition to the above, we have responded to specific questions. A summary of responses is set out in Table 11.1 below.

Table 11.1 Summary of Responses to Specific Questions.

Housing	
<i>"Q.4 Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?"</i>	We do not agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period and consider that this has not been appropriately assessed. This is based on the conclusions derived from the BW report which indicates that the OAN of 1,281 dpa derived from MC is not considered to represent an accurate representation of the full OAN for Medway over the Plan period (2012 – 2035).

<p><i>"Q.5 What do you consider to be the appropriate housing market area for Medway?"</i></p>	<p>We do not outline specific housing market areas for Medway that would be considered appropriate but instead wish to highlight that rural parts of Medway (including the Site) have an influence on other housing market areas such as Tonbridge & Malling and Maidstone and therefore these housing market needs should be suitably addressed under the 'duty to co-operate'.</p>
<p><i>"Q.6 Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?"</i></p>	<p>We would consider that in light of the highlighted need for affordable housing provision that the suggested provision of affordable housing (25%) is appropriate.</p>
<p><i>Environment</i></p>	
<p><i>"Q.30 What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?"</i></p>	<p>We would consider that one of the ways in which MC would strike a balance between securing and strengthening Medway's environment and addressing the area's development needs would be to review those areas of land within Medway that do not serve the functions of the Green Belt as outlined in the NPPF and do not have a detrimental impact on the environment.</p>
<p><i>Rural Issues</i></p>	
<p><i>"Q.40 How should the Local Plan address the need to maintain and improve access to services in rural areas?"</i></p>	<p>We consider that the Local Plan should specifically address the need to maintain and improve access to services in rural areas and identify such services to support the continued viability of such areas. Contributions to address such identified need, where appropriate, should be sought from development.</p>
<p><i>"Q.41 What consideration should be given to strategic infrastructure and development in rural Medway?"</i></p>	<p>We consider that the need for strategic infrastructure and development should be appropriately assessed in relation to local needs. Emerging local planning policy should ensure that the ongoing viability of rural areas is maintained.</p>

<i>"Q 42 How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?"</i>	We consider that MC should work closely with key stakeholders, including Neighbourhood Plan creating bodies to develop appropriate policy to support the vitality of rural areas.
<i>Open Space</i>	
<i>"Q.52 Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?"</i>	We consider that open space provision should take a balance between the two approaches, based on individual site context.
<i>Deliverability</i>	
<i>"Q.77 Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?"</i>	We consider that it is appropriate to set different rates of affordable housing and CIL contributions to take into account differing viability areas within Medway.
<i>Development Strategy</i>	
<i>"Q.81 Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?"</i>	We consider that a range of development types should be utilised in meeting Medway's growth requirements, based on the local context.
<i>"Q.84 Should the green belt boundary be reviewed?"</i>	We would support a review of the Green Belt boundary to assess the development potential of land that does not meet the five purposes of the Green Belt as set out in the NPPF, especially in the light of meeting increased housing numbers.

- 11.6 In the light of the above, we consider that the Site represents a suitable location for future allocation that has been appropriately tested and subjected to a Green Belt review as the Local Plan advances.

Appendix 1

North Field, Halling Site Location Plan



A2



0 50m 100m
(1:1250)

NOTES

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REV	DESCRIPTION	DATE	AUTHOR	CHK'D
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KEY

- Site boundary
- Land also owned by applicant
- Location of residential development
- Site access
- Proposed planting
- Existing trees

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PROJECT
Former Cemex Site - North Field
Halling, Kent
For: Redrow Homes South East

DRAWING
Location Plan - 01

SCALE	DATE	AUTHOR	CHK'D
1:1250 @ A2	02/04/14	RB/AW	RB
JOB NO.	DRAWING NO.	REV	
REDR131007	LP-01	-	

Appendix 2

Objective Assessment of Housing Need: Critical Review (Barton Willmore, February 2016)

MEDWAY COUNCIL

OBJECTIVE ASSESSMENT OF HOUSING
NEED

CRITICAL REVIEW

Prepared on behalf of Redrow Homes (South East)

February 2016

MEDWAY COUNCIL
OBJECTIVE ASSESSMENT OF HOUSING NEED
CRITICAL REVIEW
Prepared on behalf of Redrow Homes (South East)
February 2016

Project Ref:	23486/A5/DU/DM
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Checked by:	DU DM
Authorised by:	AW

Barton Willmore LLP
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

Tel:
Fax:
Email:

Ref: 23486/A5/DU/DM/kf
Date: 29 February 2016

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1.0 INTRODUCTION

- 1.1 This Technical Note has been prepared by Barton Willmore on behalf of Redrow Homes (South East), in order to review the Objectively Assessed Housing Need (OAN) determined for Medway Council as set out in the Council's Strategic Housing and Economic Needs Assessment (SHENA). The SHENA has been prepared in partnership with Gravesham Borough Council, however in this review we focus on the OAN for Medway only.
- 1.2 The review presented here has been undertaken in the context of the policies of the National Planning Policy Framework (NPPF) and the supporting Planning Practice Guidance (PPG) requirements that a full, unconstrained OAN is prepared.
- 1.3 The review is structured as follows:

Section 2 provides an outline of the relevant National Planning Policy Framework (NPPF), the supporting Planning Practice Guidance (PPG), and Local Planning Policy.

Section 3 reviews the latest official demographic evidence for Medway, including:

- Latest ONS population and CLG household projections;
- ONS mid-year population estimates and past migration trends.

Section 4 provides a review of the SHENA in the context of the requirements of PPG's Housing and Economic Development Needs Assessment guidance (ID2a).

Section 5 summarises our critique of the SHENA to recommend an appropriate way forward in assessing overall housing need for Medway.

2.0 PLANNING POLICY CONTEXT

A) NATIONAL PLANNING POLICY

i) Introduction

- 2.1 The National Planning Policy Framework (NPPF, 27 March 2012) and the accompanying Planning Practice Guidance (PPG, 06 March 2014) set out the requirements within which local planning authorities should be setting their overall housing targets as part of a full objective assessment of overall need. These requirements are summarised below.

ii) National Planning Policy Framework (27 March 2012)

- 2.2 NPPF sets out the Government's planning policies for England and how these are expected to be applied. NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the Country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).
- 2.3 In respect of delivering a wide choice of high quality homes, NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).
- 2.4 Furthermore, it states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (paragraph 50).
- 2.5 With regard to plan-making, local planning authorities are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156).
- 2.6 NPPF states that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework (paragraph 157).
- 2.7 Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of and strategies for housing and employment uses, taking full account of relevant market and economic signals (paragraph 158).

- 2.8 For plan-making purposes, local planning authorities are required to clearly understand housing needs in their area. To do so they should:

“prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries; The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

meets household and population projections, taking account of migration and demographic change;

addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).”¹

iii) Planning Practice Guidance (PPG, 06 March 2014)

- 2.9 PPG was issued as a web based resource on 6th March 2014. Guidance on the assessment of housing development needs (PPG ID: 2a) includes the SHMA requirement set out in NPPF and supersedes all previous published SHMA practice guidance (CLG, 2007).
- 2.10 The primary objective of the housing development needs assessment (the SHMA) is to identify the future quantity of housing needed, including a breakdown by type, tenure and need (PPG ID2a 002)
- 2.11 Housing need refers to the scale of housing likely to be needed in the housing market area over the plan period, should cater for the housing demand in the area and identify the scale of housing supply necessary to meet that demand. (PPG ID2a 003)
- 2.12 The assessment of need is an objective assessment based on facts and unbiased evidence and constraints should not be applied (PPG ID2a 004).
- 2.13 Use of the PPG methodology for assessing housing need is strongly recommended, to ensure that the assessment is transparent (ID2a 005). The area assessed should be the housing market area (ID2a 008), reflecting the key functional linkages between places where people live and work (ID2a 010).

¹ Paragraph 159, National Planning Policy Framework, 27 March 2012;

PPG methodology for assessing housing need

- 2.14 The full methodology is set out at ID 2a 014 to 029 (overall housing need at ID2a 015 to 020), and is introduced as an assessment that should be based predominately on secondary data (ID2a 014).

Starting point estimate of need

- 2.15 The methodology states that the starting point for assessing overall housing need should be the household projections published by the Department for Communities and Local Government, but that they are trends based and may require adjustment to reflect factors, such as unmet or suppressed need, not captured in past trends (ID2a 015).

"The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing." (2a-015) (Our emphasis)

Adjusting for demographic evidence

- 2.16 The PPG methodology advises that plan makers may consider testing alternative assumptions in relation to the underlying demographic projections and household formation rates. It also states that 'account should be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates' (2a-017).

Adjusting for likely change in job numbers

- 2.17 In addition to taking into account demographic evidence the methodology states that job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).

"Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns ... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems." (2a-018)

- 2.18 The PPG also confirms the importance of ensuring sufficient growth in the working age population (16-64), at paragraph 2a-018 and 2a-21:

“Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area.” (2a-018)

“When considering future need for different types of housing, plan makers will need to consider whether they plan to attract a different age profile e.g. increasing the number of working age people.” (2a-021)

Adjusting for market signals

- 2.19 The final part of the methodology regarding overall housing need is concerned with market signals and their implications for housing supply (2a-019:020).

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.” (2a-019)

- 2.20 Assessment of market signals is a further test intended to inform whether the starting point estimate of overall housing need (the household projections) should be adjusted upwards. Particular attention is given to the issue of affordability (2a-020).

“The more significant the affordability constraints ... and the stronger other indicators of high demand ... the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be.” (2a-020)

Overall housing need

- 2.21 An objective assessment of overall housing need can be summarised as a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b) the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.

- 2.22 The extent of any adjustment should be based on the extent to which it passes each test. That is:

- It will at least equal the housing need number implied by the latest demographic evidence,
- It will at least accommodate projected job demand; and,
- On reasonable assumptions, it could be expected to improve affordability.

Affordable housing need assessment

- 2.23 The methodology for assessing affordable housing need is set out at 2a-022 to 029 and is largely unchanged from the methodology it supersedes (SHMA 2007). In summary, total affordable need is estimated by subtracting total available stock from total gross need. Whilst it has no bearing on the assessment of overall housing need, delivering the required number of affordable homes can be used to justify an increase in planned housing supply (2a-029).

"The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments ... An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes." (2a-029) (our emphasis)

B) LOCAL PLANNING POLICY**i) Medway Council Local Plan – Issues and Options 2012-2035 (January 2016)**

- 2.24 The Medway Council Local Plan Issues and Options Plan (draft Plan) represents the first formal stage of the Local Plan process, and sets out a strategy for development in Medway up to 2035.
- 2.25 In respect of the OAN for Medway, the Plan states the following:

"The Government requires Local Planning Authorities to determine the objectively assessed needs (OAN) for housing in their strategic housing market areas. Work carried out for the North Kent Strategic Housing and Economic Needs Assessment (SHENA) in 2015 has analysed demographic, economic and market signal information to assess the quantity and types of housing that will be needed to meet the projected growth in households over the plan period. This concludes that the Local Plan needs to make provision for up to 29,463 new homes by 2035."²

- 2.26 The OAN determined by the Strategic Housing and Economic Needs Assessment (SHENA) equates to 1,281 dwellings per annum over the period 2012-2037, not the plan period (2012-2035). The Plan states how the Council is committed to planning positively to meet the development needs of Medway.
- 2.27 The study Barton Willmore presents here provides a full critique of the SHENA to evaluate whether the OAN is positively prepared in line with the requirement of the NPPF.

² Paragraph 7.8, page 21, Medway Council Issues and Options Consultation Document, January 2016

2.28 The Issues and Options Plan also identifies Medway as a major economic hub within the South East region and Medway's location within the Thames Gateway offers excellent opportunities to stimulate business growth.

2.29 A key issue for the Local Plan will be:

"To secure a successful economic base in Medway, providing a range of jobs for residents and securing sustainable growth without exacerbating the need to travel to access high quality job opportunities."³

2.30 Furthermore, the Issues and Options Plan outlines the scale of economic growth forecast for Medway as follows:

"To forecast the scale and nature of economic growth anticipated in Medway over the plan period, calculations have been carried out based on an assessment of the population growth projections, the strengths of the local economic, knowledge of growth sectors, and impacts of major strategic developments such as London Paramount. The research has forecast a growth of around 17,200 new jobs in Medway up to 2037. Over half of these jobs are expected in non-B class activities, such as retail and healthcare."⁴

C) SUMMARY

2.31 The NPPF and PPG requires that in planning for future levels of housing, local authorities should boost significantly the supply of housing in their area that meets in full, the objectively assessed need for market and affordable housing. In doing so local authorities should;

- identify a scale of housing that meets household and population projections;
- account for migration and demographic change in formulating housing requirements;
- ensure that assessment of, and strategies for, housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals; and
- work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing.

³ Paragraph 8.18, page 32, Medway Council Issues and Options Consultation Document, January 2016

⁴ Paragraph 8.19, page 32, Medway Council Issues and Options Consultation Document, January 2016

- 2.32 The following sections of this report provide an analysis of the starting point in objectively assessing overall housing need according to PPG – official ONS and CLG projections and estimates – and a full review of the SHENA and the OAN it determines for Medway. This will enable us to reach a conclusion as to whether the SHENA provides for full OAN.

3.0 HOUSEHOLD DEMOGRAPHICS

- 3.1 The PPG advises that the starting point for estimating overall housing need should be the latest household projections produced by the Department for Communities and Local Government (CLG) and that account should be taken of the most recent demographic evidence, including Office for National Statistics (ONS) population estimates.
- 3.2 This section reviews the latest official ONS demographic and CLG household data for Medway. Comparisons are made alongside the South East region and the national average.
- 3.3 To align with the assessment of housing need in the Council's draft Plan and the SHENA, we provide our analysis in this section (where possible) based on the 23-year period 2012-2035.

i) Historic population growth – ONS Mid-Year Population Estimates

- 3.4 Medway is currently estimated to have a population of 274,000 according to the ONS 2014 Mid-Year Population Estimates. Since 2001 Medway's population has grown by 24,300 which is equivalent to a rate of 9.7%. Medway's rate of population growth is slightly lower than the national average (9.8%) and lower than the regional average (10.6%) as shown in Table 3.1.

Table 3.1: Historic population change (2001-2014)

	2001	2014	2001-2014 change	
			No.	%
Medway	249,700	274,000	24,300	9.7%
South East	8,023,400	8,873,800	850,400	10.6%
England	49,449,700	54,316,600	4,866,900	9.8%

Source: Mid-Year Population Estimates, Office for National Statistics

All figures have been individually rounded to the nearest one hundred and may not sum

Percentages have been calculated using unrounded numbers

- 3.5 Population changes as a result of net migration and natural change. Table 3.2 provides the detailed components of change for Medway.

Table 3.2: Components of population change – Medway

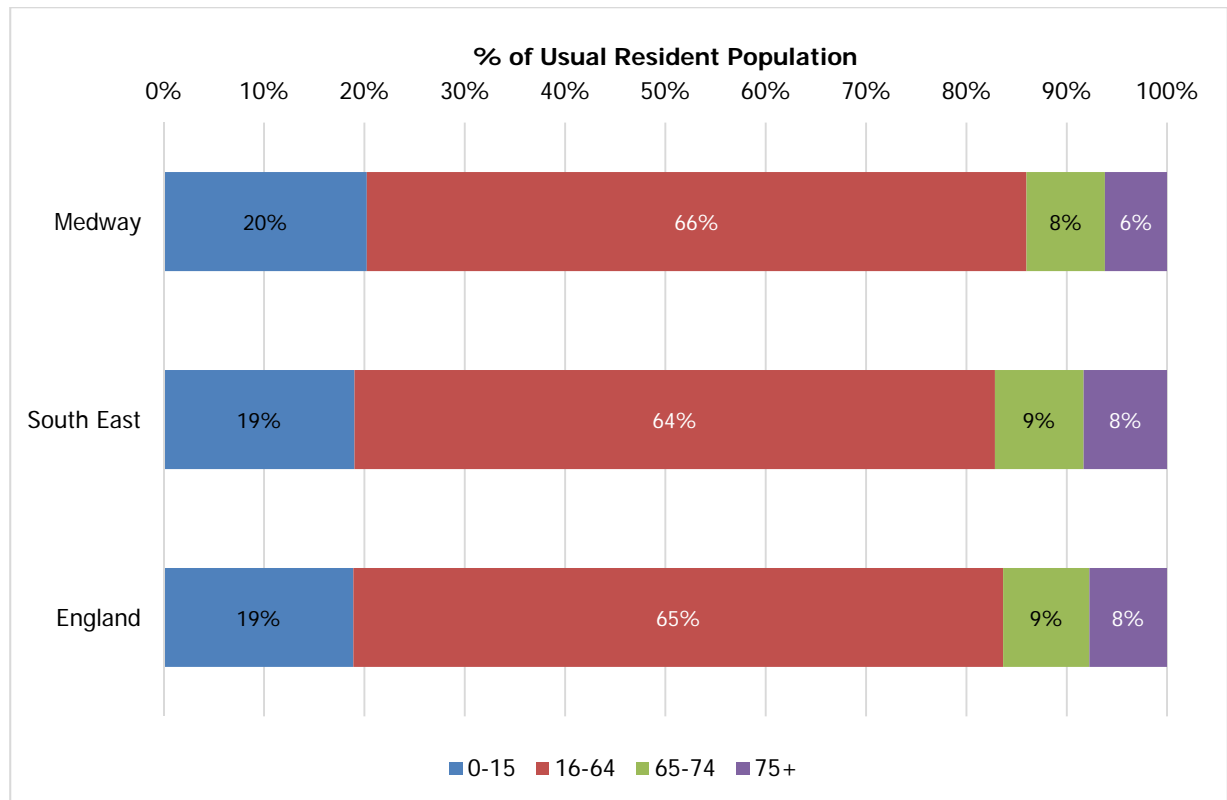
	Natural change	Net Migration	Other changes	Total change
2001/02	879	-250	-71	558
2002/03	1046	-270	121	897
2003/04	988	-782	94	300
2004/05	1,030	-691	300	639
2005/06	1,033	115	232	1,380
2006/07	1,247	969	130	2,346
2007/08	1,304	998	98	2,400
2008/09	1,383	374	249	2,006
2009/10	1,450	776	282	2,508
2010/11	1,539	652	-44	2,147
2011/12	1,546	1,793	-6	3,333
2012/13	1,452	1,280	155	2,887
2013/14	1,510	1,296	104	2,910
Average 2001/14	1,262	482	126	1,870
Average 2007/12	1,444	919	116	2,479
Average 2009/14	1,499	1,159	98	2,757
Average 2004/14	1,349	756	150	2,256

Source: Mid-Year Population Estimates, Office for National Statistics

- 3.6 At the start of the decade Medway experienced net outward migration. However, since 2005 net migration to Medway has been positive meaning that more people have moved to Medway than moved out.
- 3.7 Medway has also experienced positive natural change (more births than deaths) which has increased between 2001 and 2014. In addition there is positive 'other' change (change that is not possible to identify as either migration or natural change) equating to 1,640 people, or an average of 130 people per annum over the period 2001-2014.
- 3.8 Over the period 2001 and 2014, population change in Medway has largely been as a result of natural change (67%). However more recent trends reflect a shift in the components of population change as a result of net migration increasing considerably since 2011.

- 3.9 Medway has a younger age profile than the regional and national averages, with a larger proportion of the population aged 0-15 years and 16-64 years, as shown in Figure 3.1.

Figure 3.1: Age profile, 2011



Source: 2011 Census

ii) Office for National Statistics (ONS) population projections

- 3.10 The ONS produces population projections for all local authority areas in England. These are referred to as the Sub National Population Projections (SNPP) and are published by the ONS usually every two years.
- 3.11 The ONS SNPP are trend-based projections. That is, they project forward past demographic trends in births, deaths and migration. They do not take account of any future changes to government policy which may affect these past trends.
- 3.12 Table 3.3 sets out the official ONS SNPP in chronological order from the 2008-based series to the most recent 2012-based SNPP (29 May 2014). The 'interim' 2011-based SNPP and 2012-based SNPP take account of findings from the 2011 Census of the population. Growth is considered over the period 2012-2033 (2008-based) and 2012-2037 (2012-based). However, in line with the Medway Plan period, growth has also been considered over the period 2012-2035. The shorter period presented in respect of the 2008-based series is due to the projections finishing in 2033.

Table 3.3: ONS Population Projection series for Medway

Series	2012	2021	2033/35	2037		2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012-based	268,200	290,500	322,700*	326,800		22,300 (2,480)	54,500 (2,370)	58,600 (2,340)
2011-based (interim)	267,300	290,300				23,000 (2,560)		
2008-based	257,600	269,700	286,300**			12,100 (1,340)	28,700 (1,370)	

Source: Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding

*2035; **2033.

- 3.13 The latest 2012-based SNPP project significantly higher population growth than the previous full 25-year projection series (the 2008-based SNPP) and marginally higher growth than the interim 2011-based series. This is expected given the analysis presented earlier in this chapter which shows net migration to Medway increasing in recent years.
- 3.14 Despite the 2012-based SNPP projecting the highest population growth, it is important to note that the 2012-based SNPP are underpinned by trends captured over the 2007-2012 period. This period was characterised by an economic recession and for this reason, resulted in atypical migration trends in some areas.
- 3.15 From reference to the 2012-based ONS SNPP components of change, the 2012-based ONS SNPP is underpinned by average net in-migration of 840 people per annum, 2012-2035. However, analysis of net migration trends from the period 2007-2012 from which the 2012-based SNPP trends are drawn puts average net migration at 919 people per annum. This compares to the most recent long-term trend (2004/5-2013/14) of 760 people per annum and the most recent 5-year trend (2009/10-2013/14) of 1,160 people per annum.
- 3.16 The analysis of migration trends for Medway therefore suggests a short-term trend in Medway is a prudent base from which to plan. However, whilst the most recent 5-year migration trend suggests higher net migration to Medway (largely influenced by the three most recent years) than the 2012-based SNPP, it is not possible to say with any certainty whether Medway will see a continued rise in migration. On this basis, the 2012-based SNPP are considered to provide a reasonable demographic projection for Medway.
- 3.17 However, the 2012-based SNPP are considered to represent the very minimum of future population growth in Medway given the 2012-based SNPP are considered to be conservative due to the national projections which underpin them. The 2012-based SNPP are constrained to the 2012 National Projections published in 2013. The national projection is based on an

assumption of 165,000 net international migrants coming into the UK per annum, and this assumption is projected forward per annum over the full 25 years of the 2012-based SNPP period. However net international migration of 165,000 people per annum conflicts significantly with the latest migration statistics report by the ONS, which shows net international migration of 336,000 people in the year ending June 2015, over double the 2012-based SNPP assumption.

- 3.18 The ONS appear to have noted this significant increase in net international migration, recently publishing the 2014 National Projections and assuming 185,000 net international migrants per annum. However this remains significantly lower than has been seen in the recent past. Although the forthcoming 2014-based ONS SNPP (expected May 2016) will project higher population growth across the country on the basis of these revised 2014-based National Projections, the assumption of 185,000 net international migrants per annum remains a very conservative estimate on the basis of recently recorded trends.
- 3.19 In this context the 2012-based SNPP are considered to be underpinned by assumptions which lead to a minimum level of population growth over the Plan period (2012-2035). Therefore the projected population growth presented in Table 3.3 is very likely to be conservative given that Medway is historically a net receiver of international migrants.
- 3.20 It is important to be aware of the issues related to the SNPP because the CLG household projections underpinned by the 2012-based SNPP. The household projections are derived by applying household representative rates to the ONS population projections. Household projections will be discussed in the next section.
- 3.21 The 2012-based ONS SNPP project the working age population to grow at a much slower rate than the population as a whole as is shown in Table 3.4. Given the extension of State Pension Age, there will be an increasing number of people working beyond the age of 64 years and therefore it is also important to consider the projected growth of the 65-74 year old population.

Table 3.4: Working Age Population Change, 2012-2035

Age Group	Medway
16-64	18,050 (10.3%)
65-74	11,900 (53.5%)
Total (16-74 years)	29,950 (15.2%)
Total (all ages)	57,800 (21.8%)

Source: 2012-based SNPP, Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding. Percentages calculated using unrounded numbers.

- 3.22 It is evident from Table 3.4 that the growth in the working age population (16-74 years) in Medway is heavily driven by the growth in the population aged 65-74 years (53.5% growth). Realistic assumptions need to be applied as to how greatly people over the age of 65 years can contribute to the resident labour force.
- 3.23 The PPG states 'where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns' (PPG, ID2a, 018). Whilst the 2012-based SNPP do project an increase in the working age population in Medway, further work is required in order to determine whether the level of workforce growth is sufficient to support the projected level of job growth.

iii) Communities and Local Government (CLG) household projections

- 3.24 Table 3.5 sets out the official CLG household projections in chronological order from the 2008-based series to the most recent 2012-based series (27 February 2015).

Table 3.5: CLG Household Projections for Medway

Series	2012	2021	2033/35	2037	2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012-based	108,190	120,470	137,640*	139,950	12,280 (1,360)	29,450 (1,280)	31,760 (1,270)
2011-based (interim)	107,970	119,320			11,350 (1,260)		
2008-based	107,470	116,090	125,890**		8,620 (960)	18,420 (880)	

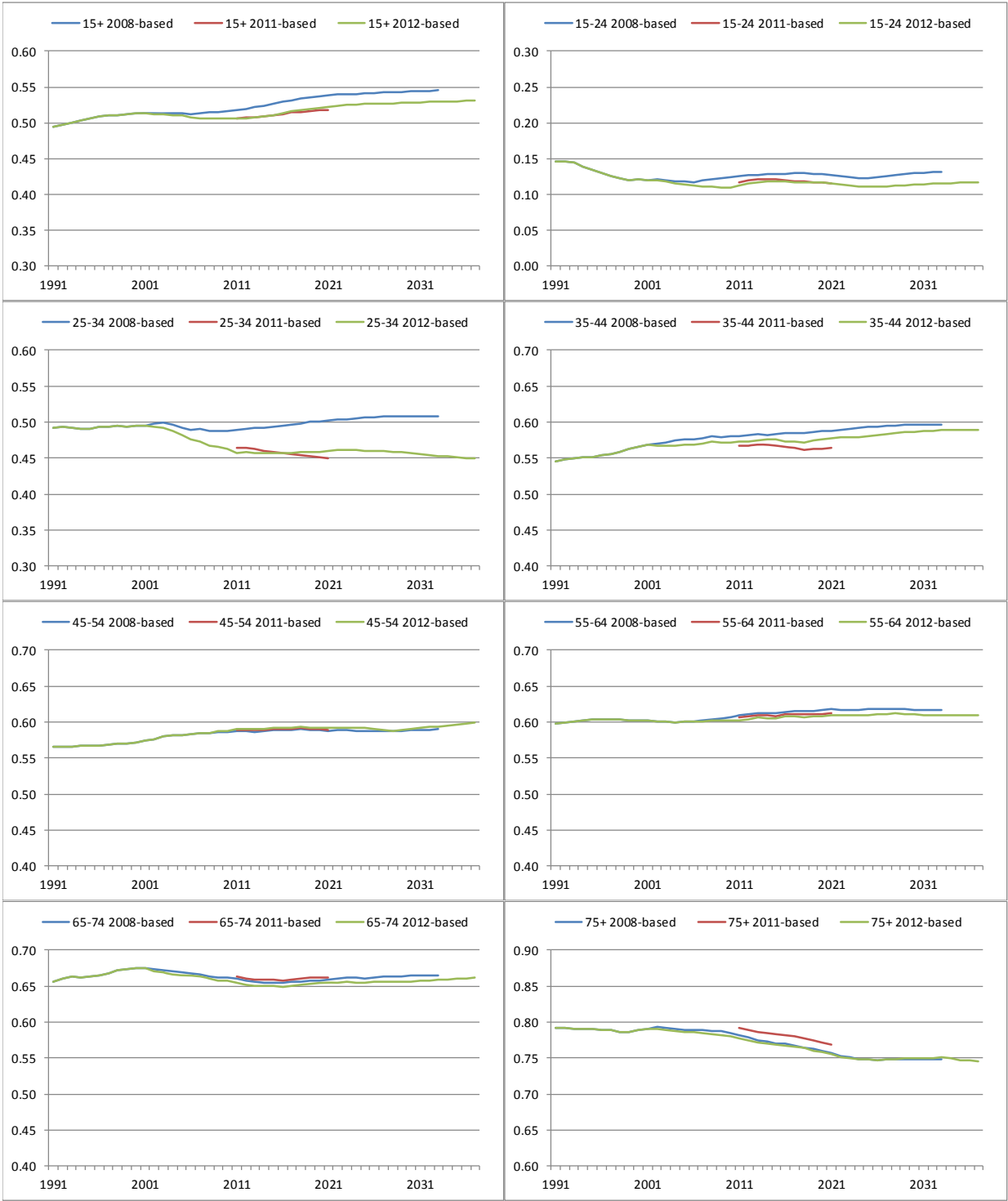
Source: (CLG) Communities and Local Government (rounded to nearest 100) Note: Figures may not sum due to rounding
 *2035; **2033

- 3.25 As the PPG states the CLG projections should form the 'starting point estimate' only of overall housing need as part of a full objective assessment of need. The latest CLG 2012-based household projections show growth of 1,280 households per annum in Medway over the Plan period (2012 and 2035). To reach a dwelling requirement, account needs to be taken of vacant and second homes. For Medway this rate is 3.27%⁵ resulting in a dwelling projection of 1,323 dwellings per annum, 2012 to 2035.
- 3.26 The growth projected by the CLG 2012-based household projections is higher than the growth projected by the previous two series of household projections (the 'interim' 2011 and 2008-based series), but this is expected given the 2012-based SNPP projected higher population growth than the other two series.

⁵ CLG, CTB 2014 (Second Homes); CLG Live Table 125/615 (Vacant)

- 3.27 However, like the 2012-based SNPP, the 2012-based household projections are also underpinned by recessionary trends in relation to household formation, whereas the 2008-based projections are underpinned by trends gathered prior to the recession and are therefore higher in terms of projected household formation, particularly in younger age groups.
- 3.28 The CLG have published household formation data for the 2012-based household projections (household formations rates by age and gender). The rates show that household formation in the 2012-based projection still projects a declining household formation rate trend in the 25-34 and 35-44 age groups (see Figure 3.2 below) when compared with the interim 2011-based and 2008-based projections.
- 3.29 The interim 2011-based household projections were widely regarded to project forward very low household formation in younger age groups. This was due to the trends underpinning the projections covering the period just prior to and including the recessionary period, when housing became rapidly less affordable for people in the younger age groups due to a lack of supply.
- 3.30 Figure 3.2 illustrates that the 2012-based rates for Medway follow a similar trajectory to that of the interim 2011-based projections before them. After 2025 the 2012-based projection shows a declining trend which results in the gap between the 2008 and 2012-based rates increasing, and suppression in the 2012-based rate worsening.

Figure 3.2: Household Formation Rates, Medway



Source: CLG

- 3.31 The trend for declining household formation in the 25-44 age group is likely to be caused in part by worsening affordability. Planning for housing on the basis of a continuation of these suppressed household formation rates is not supported by PPG which recommends adjustments to households formation rates to reflect factors not captured in past trends (ID 2a-015).
- 3.32 Furthermore, planning on the basis of the 2012-based household formation rates is not considered to be in accordance with the principles of positive planning, and would likely place significant pressure on housing supply. Recent Planning Inspectorate decisions concur with this view.⁶
- 3.33 In this context, and given that the 2012-based projections show slightly lower household formation particularly for 25-44 year olds than the pre-recessionary 2008-based projections, it is considered that an adjustment needs to be made to comply with the National Planning Policy Framework's (NPPF) clear policy to 'boost significantly' the supply of housing, 'promote economic growth' and 'positively prepare' Local Plans.
- 3.34 How this adjustment should be applied has been subject of much debate, and there is not considered to be one correct answer, as it is a matter of judgement. However Barton Willmore would suggest a blended approach whereby the 2012-based HFRs are applied in all age groups, as published, with the exception of the 25-44 age group. In this age group it is considered that a gradual return to the projected 2008-based HFRs by the end of the Plan period is applied. This is considered to comply with the NPPF requirement to ensure that Local Plans are positively prepared, and a significant boost is made to housing supply.

iv) Housing Completions

- 3.35 A lack of housing completions can have a significant impact on the ability for people to move into an area to live, and for existing residents to have the opportunity to purchase their own property. A lack of housebuilding can lead to existing residents having to migrate out of the area. Table 3.6 sets out net completions for Medway over the past 10 years.

⁶ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

Table 3.6: Net Completions, Medway

Year	Net Completions	Plan Target	Surplus/Deficit
05/06	562	700	-138
06/07	591	815	-224
07/08	761	815	-54
08/09	914	815	+99
09/10	972	815	+157
10/11	657	815	-158
11/12	809	1,000	-191
12/13	565	1,000	-435
13/14	579	1,000	-421
14/15	483	1,000	-517
Total	6,893	8,775	-1,882

Source: Annual Monitoring Report

- 3.36 As Table 3.6 shows, since 2005/06 the number of completions has consistently fallen below Development Plan targets, with the exception of two years (08/09 and 09/10). This has resulted in a deficit of -1,882 dwellings over 10 years, representing 20% of planned supply.
- 3.37 Furthermore when compared against the official CLG household projections set out above in Table 3.6, the starting point estimate of need has been at least 1,260 per annum, which suggests under-delivery has been even worse than the comparison against Plan targets.
- 3.38 Notwithstanding this it is considered that this persistent under-delivery in Medway will have had a significant impact on the propensity of people to migrate into the area over the last 10 years. The net-migration trends can therefore be considered to have been constrained by a lack of delivery.

v) Summary

- 3.39 In summary, this section has considered the most up-to-date official population and household projections published by CLG and ONS. The key headlines from this section are as follows:
- The PPG emphasises that CLG household projections should only form the 'starting point' in an objective assessment of the overall housing need, and that sensitivity testing based on alternative demographic and household formation assumptions may be considered;

- This 'starting point estimate' is currently growth of 1,281 households per annum in Medway, using the latest 2012-based CLG household projections over the period 2012-2035 (Medway's plan period). Applying a household/dwelling adjustment (to account for vacancy and second home rates) the overall housing need is 1,323 dwellings per annum;
- However, Barton Willmore consider that growth of 1,323 dwellings per annum could represent an underestimate of demographic-led housing need for a number of reasons:
- The 2012-based household projections are based on household formation rate trends observed over the recessionary period, when affordability worsened significantly. There remains suppression in the household formation rates for 25-34 year olds in Medway. PPG states that adjustments may be required to the household projection estimate of need if rates have suppressed historically (paragraph 15). An adjustment in Medway is considered necessary in the 25-34 age group to address this suppression;
- Analysis of net housing completions has highlighted that annual completions have consistently fallen below the level of need required by consecutive Development Plans, and below official CLG household projections, inhibiting the propensity of people to migrate into Medway. This would have directly influenced the net migration trends underpinning the 2012-based ONS SNPP and the 2012-based CLG household projection;
- The 2012-based ONS SNPP are also considered a conservative projection in respect of the international migration assumption they are underpinned by (165,000 people per annum). This is less than half the most recent trend data from ONS shows (336,000 people per annum).
- Analysis of migration trends has concluded that the 2012-based SNPP provide a reasonable basis on which to assess demographic-led need in Medway at this point in time. However, for the reasons set out above the 2012-based SNPP should be considered a very minimum and if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase, then an updated short term migration should be considered.

3.40 This section identifies how the starting point estimate of OAN (1,323 dpa, 2011-2031) for Medway should be considered a very minimum.

3.41 The following section of this study considers the evaluation of official ONS and CLG data in the context of the Council's OAN evidence.

4.0 REVIEW AND CRITIQUE OF THE STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

A) INTRODUCTION

- 4.1 The Strategic Housing and Economic Needs Assessment (SHENA) dated November 2015 provides the evidence base to support the Council's determination of Objectively Assessed Need (OAN) for housing in Medway. The report has been prepared by Bilfinger GVA.
- 4.2 In the context of our assessment of demographic data in the previous section of this study, the following section provides an analysis and evaluation of the SHENA's approach to OAN in Medway. The analysis we present follows the methodological requirements of section ID2a – 'Housing and Economic Development Need Assessments' (HEDNA) to determine whether the Council's proposed housing target (1,281 dwellings per annum) represents full, unconstrained OAN.
- 4.3 It is important to note that the SHENA has assessed OAN over the period 2012-2037 which is the time period considered by the latest 2012-based projection series. However, the draft Local Plan covers the period 2012-2035.

B) NORTH KENT STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

- 4.4 The 2015 SHENA seeks to establish the OAN for Medway following the methodology outlined in PPG. We would comment on the SHENA as follows:

i) Housing Market Area (HMA)

- 4.5 The SHENA begins with an assessment of the appropriate HMA in which to assess housing needs for Medway as required by PPG (ID 2a-010-20140306). The assessment's analysis draws on research published by CLG in 2010 titled 'Geography of Housing Market Areas'. In essence this research is based on work undertaken by the Centre for Urban & Regional Development Studies (CURDS) at Newcastle University.
- 4.6 The CURDS analysis is correctly presented by the SHENA as identifying Medway as falling within the London Strategic Housing Market Area which contains over 70 local authority areas. The SHENA considers this HMA definition is unmanageable and impractical (paragraph 2.9). Barton Willmore concurs with this conclusion.

- 4.7 For this reason, the SHENA also considers travel to work and migration patterns, and house price data and concludes that Medway has strong relationships with a number of neighbouring local authority areas. On this basis, the SHENA identifies a wider HMA which includes: Medway; Gravesham; Swale; Maidstone; and Tonbridge & Malling. The housing needs of the wider HMA are assessed in the SHENA
- 4.8 Barton Willmore consider the HMA definition applied in the SHENA to be inconsistent with the approach adopted in several of the authorities included within the definition. For example, Swale's housing needs were considered in isolation at the recent (November 2015) Local Plan Examination after the evidence base suggested Swale formed a HMA on its own. Similarly, Maidstone Borough are assessing their housing needs in isolation. Although Maidstone's SHMA identifies functional relationships between Maidstone and Medway, the Maidstone SHMA concludes that there is justification to distinguish Maidstone from Medway in market terms⁷. On this basis, the Maidstone SHMA considers Maidstone represents a HMA on its own.
- 4.9 On the basis of Maidstone Council and Swale Council both assessing their needs in isolation, Barton Willmore, for the purposes of this critique, consider Medway's needs in isolation.

ii) Starting point estimate

- 4.10 The SHENA gives detailed consideration to the latest 2012-based ONS Sub National Population Projections (SNPP) and CLG household projections as representing the 'starting point' estimate of need. Growth of 1,270 households per annum over the period 2012-2037 is correctly presented. However, it is important to note that over the period covered by the draft Local Plan (as presented in the current Issues and Options consultation as being 2012-2035) growth is 1,280 households per annum. The SHENA does not present this.

iii) Demographic adjustments

- 4.11 The PPG (paragraph ID2a-017) states how plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest ONS population estimates.

⁷ Paragraph 2.39, page 29, Maidstone Strategic Housing Market Assessment – Maidstone Borough Council, Final report, January 2014, GL Hearn

Adjustment to household formation rates

- 4.12 The SHENA does not undertake any sensitivity testing in relation to household formation.
- 4.13 The analysis presented in Chapter 3 of this report has shown clear suppression in household formation for those people aged 25-44 years, which Barton Willmore considers should be addressed through making an adjustment to the rates.
- 4.14 The danger of planning on this basis of the 2012-based household formation rates would be to exacerbate this suppression over a 23-year Plan period, adding to the trend of worsening affordability in Medway, and the inability of first time buyers to form their own households. This is not considered to comply with the NPPF requirement to positively prepare Development Plans.
- 4.15 Recent appeal decisions⁸ have agreed that there remains an element of suppression in the 2012-based household formation rates. A more positive approach to household formation in this age group would increase the starting point estimate above 1,270 households per annum (2012-2037)/ 1,280 households per annum (2012-2035).

Adjustment to the demographic projections

- 4.16 The SHENA presents three sensitivity scenarios with regards to the underlying population projections as an alternative to the published 2012-based ONS SNPP.
- 4.17 The **first** demographic sensitivity scenario included by GVA incorporates the 2013 and 2014 Mid-Year Population Estimates (MYPE), published by the ONS after the 2012-based SNPP were published. Despite the 2013 and 2014 MYPE projecting higher population growth than projected in the 2012-based SNPP, the effect of the SHENA incorporating the 2013 and 2014 MYPE into the 2012-based SNPP is to reduce household growth from 1,270 to 1,235 households per annum (2012-2037).
- 4.18 This seems counterintuitive (a point which the SHENA also raises at paragraph 5.38). However, the SHENA states that the reduction in household growth is due to the different age/ gender profile applied as a result of taking account of the 2013 and 2014 MYPE. This requires further investigation through bespoke modelling to establish whether this statement is correct.

⁸ Coalville and Cornwall

- 4.19 The **second** is a long-term (2005-2014) net-migration scenario which results in household growth of 1,148 households per annum – again lower than the ‘starting point’ estimate for 1,270 households per annum (2012-2037) as indicated by the 2012-based CLG household projections. This scenario projects household growth that is 10% lower than the starting point estimate.
- 4.20 Lower household growth is the result of lower projected population. The long-term trend (2005-2014) projects lower population growth because net migration is assumed to be lower (756 net migrants per annum) compared to the average net migration assumption of the 2012-based ONS SNPP (840 people per annum based on trends from the period 2007-2012).
- 4.21 At paragraph 5.39 the SHENA states that the later years of the inter-Census period (2001-2011), and the last three years since the 2011 Census (2012-2014) show the highest levels of population growth in Medway since 2001. The SHENA then goes on to state how the 2012-based CLG household projections are underpinned by trends drawn “principally from this period of high growth”⁹, and it is therefore appropriate to consider longer term trends from 2004-2014.
- 4.22 In this regard the latest Planning Advisory Service (PAS) guidance on OAN summarises the problems of using the 2007-2012 period as follows:

“The base period used in the latest official projections, 2007-12, is especially problematic. The period covers all of the last recession, in which migration was severely suppressed as many households were unable to move due to falling incomes and tight credit. Therefore the official projections may underestimate future migration - so that they show too little population growth for the more prosperous parts of the country, which have been recipients of net migration in the past. If so, by the same token the projections will also overestimate population growth for areas with a history of net out-migration.”¹⁰

- 4.23 Whilst Barton Willmore do not disagree with the consideration of longer term trends, the PPG supports adjustments to the ‘starting point’ estimate of need in relation to the underlying demographic projections and household formation rates. However, PPG states that any local changes would need to be clearly explained and justified on the basis of the established sources of robust evidence (ID 2a-017-20140306). In this instance, consideration of longer term trends does not seem appropriate for Medway as analysis of components of population change (see

⁹ Paragraph 5.39, page 93, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

¹⁰ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

Table 3.2 presented in Chapter 3 of this report and Figure 29 of the SHENA) clearly identifies net migration to Medway increasing since 2011. Therefore to consider a level of net in-migration lower than the 2012-based ONS SNPP in Medway is considered to wholly contradict the advice of the PAS Guidance.

- 4.24 GVA have chosen not to analyse a more recent 5-year trend, a decision Barton Willmore do not consider to be justified.
- 4.25 Analysis of migration trends, presented in Chapter 3 of this report, has illustrated that a more recent 5-year migration trend (2009/10 – 2013/14), which incorporates the last few years of recession, and the recent economic upturn, suggests net migration of 1,159 per annum. This is higher than the assumptions which underpins the 2012-based SNPP (840 migrants per annum) based on trends from the period 2007-2012.
- 4.26 However, there is not sufficient data at this point in time to say with any certainty whether Medway is experiencing a reversal of trend in terms of net migration. For this reason, despite a more recent 5-year trend showing higher net migration than the 2012-based SNPP, it is considered that the 2012-based SNPP provide the most reasonable demographic projection at this point in time. However, the 2012-based SNPP should provide the very minimum projection of population growth given the issues highlighted in Chapter 3 of this report. Furthermore, we reserve the right to amend this approach if subsequent releases of Mid-Year Population Estimates indicate that net migration to Medway is continuing to increase.
- 4.27 A **third** sensitivity scenario is the long-term net-migration scenario (2005-2014) including the 'unattributable population change' (UPC) recorded by ONS for Medway. The UPC is an element of population change which the ONS cannot account for. There is the possibility that it may be due to under recorded levels of international migration, but it could equally be due to other reasons.
- 4.28 The effect of including UPC within the long-term migration trend scenario is to reduce household growth to 1,124 households per annum (compared to growth of 1,148 households per annum excluding UPC) over the period 2012-2037.
- 4.29 Barton Willmore's approach is to exclude UPC from demographic modelling scenarios. This is based on the following:
- ONS' confirmation that UPC has been excluded from the calculation of the 2012-based ONS SNPP;

- Advice sent by email from ONS to Barton Willmore that it would be 'sensible' to exclude UPC from the calculation of net-migration trends;
- The ONS statement that if UPC was due to international migration, its effect would have been in the first half of the decade, after which the recording of international migration was improved;
- Local Plan Examination decisions where UPC has been excluded (Aylesbury Vale, Eastleigh, Arun). In the case of the most recent decision in Arun (February 2016), UPC was significant, yet the Inspector noted that if UPC were to be attributed to migration, errors would have been earlier in the 2001-2011 period;
- The ONS' statement that UPC is only applicable to the 2001-2011 period and does not introduce a bias that will continue in future projections.

4.30 The UPC scenario is therefore not considered to be a robust scenario for growth in Medway.

4.31 The SHENA presents demographic-led need in Medway to be between 1,124 and 1,270 households per annum over the period 2012-2037 based on the results of the two long-term migration trend scenarios. Once an allowance for vacancy has been applied this results in dwelling growth of between 1,167 and 1,317 dwellings per annum.

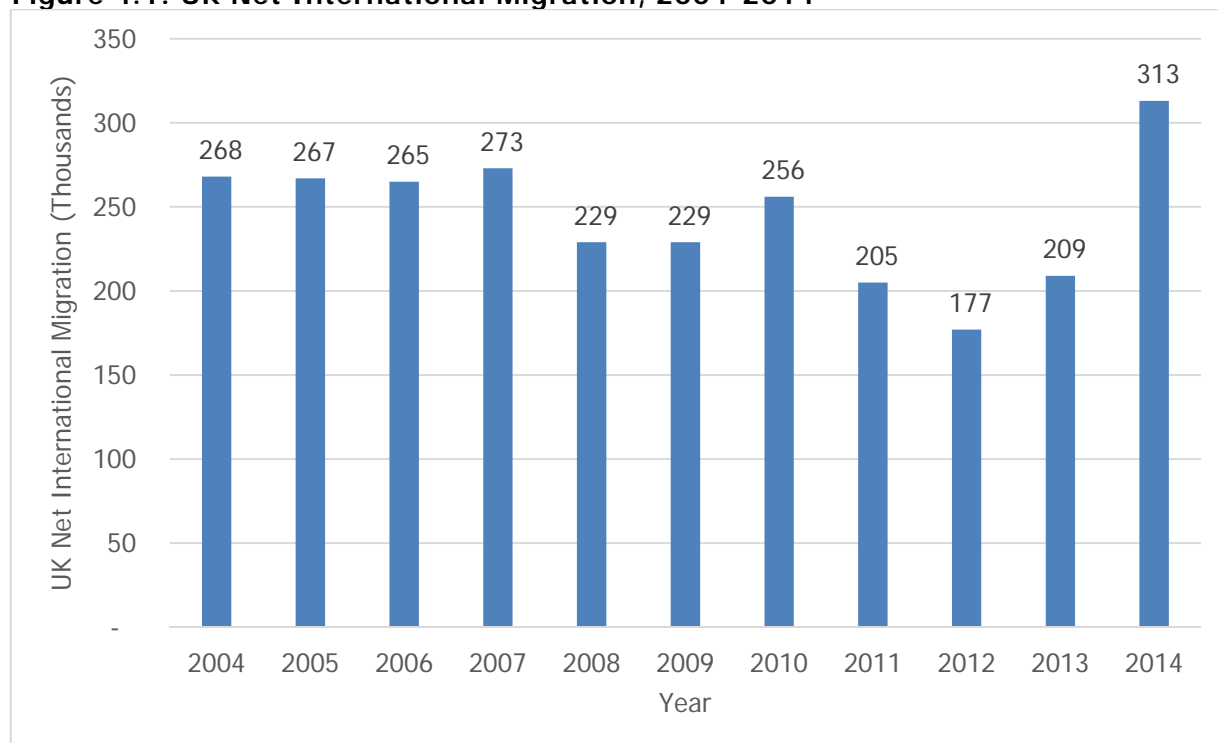
4.32 However, the SHENA acknowledges that due to the uncertainty of UPC, it is appropriate to consider an average of the two long-term migration scenarios (including and excluding UPC)¹¹. This results in growth of 1,136 households (1,179 dwellings) per annum over the period 2012-2037.

4.33 Barton Willmore consider that OAN of less than the 2012-based CLG household projection should not be considered, for the following reasons:

4.34 First, the 2012-based ONS SNPP were underpinned by net migration trends between 2007 and 2012, and as this analysis shows, they are underpinned by three years (2008-2011) when net in-migration fell significantly below two of the years prior to the 2007-2012 period. This contradicts GVA's statement that the later years of the 2001-2011 period show the highest levels of growth. This statement by GVA is not considered to be justified.

¹¹ Paragraph 5.47, Page 95, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

- 4.35 The **second point** concerns the assumption of net international migration in the 2012-based ONS National Projections, which underpin the 2012-based ONS SNPP. The 2012-based ONS national population projections are based on net international migration of 165,000 people per annum continuing every year up to 2037.
- 4.36 The assumption of net international migration in the ONS 2012-based national projections is considered by Barton Willmore to be a significant underestimate. This view is based on more recent evidence from ONS which shows how international net-migration was 336,000 people in the most recently recorded year (ending June 2015) – over double the 2012-based ONS national projection assumption. The 10-year average has also been circa 240,000 people per annum (see Figure 4.1 below).
- 4.37 On this basis alone, it is considered the 2012-based ONS SNPP, and therefore the 2012-based CLG household projections, are based on conservative assumptions and for this reason should be considered a minimum projection of future growth.
- 4.38 This is emphasised further by the more recent 2014-based national projections (29 October 2015) which have increased the assumption to 185,000 people per annum. The effect of this increase will be seen in the 2014-based SNPP, which are due for release in the first half of 2016.
- 4.39 A further effect on in-migration is the delivery of housing. Table 3.6 in this study has shown how delivery has fallen below planned targets in all but two of the past ten years. The cumulative effect has been for a deficit in delivery of 1,882 dwellings (20% lower than planned supply). This will have constrained in-migration to Medway, and trends would have been higher if planned housing targets had been met and the homes were there to be filled.

Figure 4.1: UK Net International Migration, 2004-2014

Source: Migration Statistics Quarterly Report, November 2015

4.40 Finally it is considered the past three years net in-migration to Medway (1,280, 1,293, and 1,793 people per annum respectively) highlight how the 2012-based SNPP and CLG projections are based on a conservative net in-migration assumption of only 840 people per annum.

4.41 However, given there is no degree of certainty as to whether Medway is experiencing a reversal of trend in relation to net migration, it is considered that the 2012-based SNPP at the very least should provide the minimum projection of future population growth. On this basis, for the Medway SHMA to favour the long-term migration trend approach (which projects lower population growth) is considered inappropriate.

4.42 In summary, it is not considered justified to project lower population or housing growth than the starting point estimate.

iv) Adjustments to support economic growth

4.43 The approach applied by GVA in the SHENA to economic-led OAN is generally considered robust, save for the assumptions in respect of job growth forecasts. GVA use a single source, Experian Economics, from quarter 1 of 2015. Experian is considered a robust source of job growth forecasts, however it is Barton Willmore's view that an average forecast should be taken from three sources; Experian Economics, Cambridge Econometrics, and Oxford Economics. This view has been taken following criticism of the use of using a single source in some Local Plan

examinations, given the fluctuation in forecasts, which are often published on a quarterly basis. This triangulated approach was supported by the South Worcestershire Local Plan Inspector¹².

- 4.44 In terms of unemployment assumptions, Barton Willmore's approach would be to assume a return to pre-recessionary rates of unemployment over the first ten years of the Plan period. This is a similar approach to the GVA method although they do differ slightly.
- 4.45 Economic activity rate assumptions must also be entered into demographic modelling software to generate the labour force growth required to fill jobs. GVA's approach is to use the Kent County Council 'Technical Paper Activity Rate Projections to 2036' paper (October 2011). This is the same source used by Barton Willmore, and is considered to be a robust independent method which provides unbiased assumptions of how economic activity will increase in older age groups over the next 25 years. However it should be noted that a more recent (November 2014) paper is available and this should be used in preference to the October 2011 edition.
- 4.46 The SHENA also undertakes a sensitivity test of economic activity which incorporates assumptions from Experian's Report 'Employment Activity and the Ageing Population' which has the effect of increasing economic activity of women in line with past trends from 1981, along with significantly increase economic activity for older people.
- 4.47 The commuting ratio is the final assumption which can have a significant effect on economic-led housing need. GVA's approach is to use the 2011 Census ratio of 1.28, and for this to remain static over the Plan period. This is considered a robust approach to apply.
- 4.48 The SHENA considered three economic scenarios but only presented the results of two – the Sector Based Growth scenario and the Sector Based & London Paramount Indirect Scenario. Housing need to support both economic scenarios increases above the baseline demographic needs (1,179 dwellings per annum as indicated by the mid-point of the two long-term migration trends) if KCC economic activity rates are applied; to support the Sector Based Growth scenario 1,197 dwellings per annum are required and to support the London Paramount Indirect scenario a total of 1,213 dwellings per annum are required.
- 4.49 If Experian's economic activity rates are applied, housing need to support both economic scenarios is below the baseline demographic need (1,020 dpa required to support Sector Growth scenario and 1,036 dpa to support the London Paramount scenario).

¹² Stage 1 of the Examination of the South Worcestershire Development Plan; Inspector's Further Interim Conclusions on the Outstanding Stage 1 Matters, 31 March 2014

- 4.50 It is important to note that the level of housing need identified from both economic scenarios and both economic sensitivity tests, is below the 'starting point' estimate of 1,270 households/1,317 dwellings per annum (2012-2037) as indicated by the CLG 2012-based household projections.

v) Market signals adjustment

- 4.51 The GVA report provides a summary of median **house price** increases in Medway between 2000 and 2013. The source used by GVA in obtaining this information (CLG) is considered robust. As GVA summarise, between 2000 and 2013, values in Medway increased by 128.6%; the second fastest rate observed out of seven authorities analysed. The rate also exceeded inflation in the south east region as a whole (96%).¹³
- 4.52 The SHENA's summary of rental prices shows a significant worsening in the lower quartile **rental prices** in Medway. Over the short period analysed (2010-2014), lower quartile rents increased by 10%; the second highest of the seven authorities analysed. This represents an increase of double that experienced in the south east region (4.3%), and triple the increase across England (3.3%). There is a clear affordability problem in respect of lower quartile rents in Medway when compared to surrounding areas.
- 4.53 The change in the **affordability ratio** is often the most crucial of market signals indicators, and the GVA report provides a summary of the lower quartile and median affordability ratios in Medway, compared to seven Kent authorities, the south east region, and nationally. The GVA report highlights how the lower quartile affordability ratio in Medway had increased by 65% between 2000 and 2013, and that this increase represents a more acute increase than the region (51%) and nationally (65%).¹⁴ This highlights how affordability has significantly worsened in Medway over the thirteen years analysed.
- 4.54 This study (section 3) identifies how household formation is suppressed in the 25-34 age group in the most recent 2012-based CLG household projections. The result of assuming the formation rates as published, and planning for growth based on them, will be a failure to address the significant increase in **concealed households** in Medway between the 2001 and 2011 Censuses. This increase across the country has been due to the significant worsening affordability of housing, leading to two or more adult households living with one another rather than forming their own households.

¹³ Paragraph 5.90, SHENA

¹⁴ Paragraph 5.97, SHENA

- 4.55 This trend is evidenced in Medway by the 68% increase in concealed households between the 2001 and 2011 Census'. This is broadly comparable to the regional and national averages (71%) although the SHENA states that concealment is not deemed to be worsening at a significant rate. However, the rate of increase in Medway is higher than in Canterbury (66%), Sevenoaks (56%), and Tonbridge and Malling (54%).
- 4.56 Furthermore the SHENA acknowledges a 13.03% increase in concealed households in the under 25 age group (13%). This is higher than the national average (12.76%) and several other Kent local authorities (Canterbury, Dartford, Maidstone, and Swale).¹⁵ Despite this, the SHENA concludes that the market signals information in respect of concealed families does not provide strong evidence of supply led pressures in Medway¹⁶. Barton Willmore disagree and a response in establishing the OAN for Medway is needed to alleviate this worsening trend.
- 4.57 The **rate of development** is also considered as a market signal, with the PPG stating how future supply should be increased to reflect the likely under-delivery of a Plan, if the rate of development has been lower than the planned number. A meaningful period must be assessed in line with PPG, and as this study has shown (Chapter 3), delivery in Medway has been 20% lower than the planned number over the past 10 years.
- 4.58 The GVA report also identifies this lack of delivery, but over the intercensal period (2001-2011) rather than the last 10 years considered in this study (2005-2014). Notwithstanding this difference, GVA identify growth in Medway's housing stock of 7.3%; lower than the sub-regional, regional, and national averages. Furthermore GVA identify how completions have exceeded planned targets in only three of the 12-year period between 2001/02 and 2012/13¹⁷.
- 4.59 In summary, it is important to note the PPG, which states the following in respect of market signals:

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings." ¹⁸

"Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections." ¹⁹
(Our emphasis)

¹⁵ Table 51, SHENA

¹⁶ Paragraph 5.108, SHENA

¹⁷ Paragraph 5.118, SHENA

¹⁸ ID2a-019, Housing and Economic Development Needs Assessments, PPG

¹⁹ ID2a-020, Housing and Economic Development Needs Assessments, PPG

- 4.60 In the context of the PPG, and the analysis set out by GVA, it is clear than an upward adjustment to the CLG household projection for Medway is required. Failure to do so will only serve to exacerbate the conditions which have led to the affordability problems experienced in Medway over the past 10 to 15 years.
- 4.61 The PPG does not quantify the market signals uplift, other than to say how “plan makers should set this adjustment at a level that is reasonable” and “on reasonable assumptions could be expected to improve affordability.”²⁰ Local Plan Examination decisions are the only source in which market signals adjustments have been quantified. At the Eastleigh Local Plan Examination, the Inspector recommended a 10% uplift to demographic-led projections in order to alleviate market pressure considered as “modest”. This level of uplift was considered “cautious” by the Inspector.²¹ The same level of uplift was also considered applicable by the Uttlesford Local Plan Inspector.
- 4.62 An equally cautious uplift of 10% to the 2012-based CLG household projection in Medway would result in an increase to at least **1,456 dwellings per annum**.
- 4.63 The SHENA considers the level of uplift the economic-led scenarios with KCC economic activity rates applied would make to the baseline demographic level of need (mid-point between the two long term migration trends). This is presented as between a 1.5% and 2.9% uplift which is not considered sufficient to respond to the local market signals.²² Barton Willmore agree.
- 4.64 As an alternative, the SHENA also considers the level of uplift the CLG 2012-based household projections, updated to take account of the 2013 and 2014 MYPE, provides to the mid-point of the two long-term migration trends. This is presented as being equivalent to an 8.6%, which the SHENA considers a significant uplift.²³
- 4.65 On this basis the **SHENA concludes on OAN for Medway of 1,281 dwellings per annum** (2012-2037) as indicated by the CLG 2012-based household projections updated to take account of the 2013 and 2014 MYPE.
- 4.66 Barton Willmore do not consider the market signals uplift applied in the SHENA to be sufficient. The SHENA’s ‘uplift’ is applied to the SHENA’s long-term migration trend which is already below the starting point estimate according to PPG. Therefore even applying the market signals ‘uplift’ results in OAN that is still below the starting point estimate (1,281 dpa compared to 1,323 dpa).

²⁰ ID2a-020, Housing and Economic Development Needs Assessments, PPG

²¹ Paragraphs 39-41, Eastleigh Borough Local Plan, Inspector’s Report, February 2015

²² Paragraph 5.129, SHENA

²³ Paragraph 5.130, SHENA

vi) Affordable housing need

- 4.67 As stated in the NPPF, LPAs are required to ensure their local plans meet OAN for both market and affordable housing. The Satnam v Warrington BC High Court Judgment provides useful guidance on the proper exercise that needs to be undertaken to assess affordable need as part of OAN. That is:

“(a) having identified OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes; (our emphasis)

(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPG, paragraphs 14 and 47.”²⁴

- 4.68 The ELM Park v Kings Lynn and West Norfolk BC High Court Judgment (July 2015) provides a more recent judgement on the role of affordable housing need within OAN, determining that affordable need did not have to be met in full when determining OAN but rather:

“This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA “addresses” these needs in determining the FOAN. They should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area.”²⁵

- 4.69 It is therefore clear that where there is significant affordable housing need, although it is not required to be met in full, an increase should be considered.

- 4.70 In the context of this, the Council's draft Plan states the following in respect of affordable housing need in Medway:

“The Strategic Housing Market Assessment (SHMA) carried out in 2015 for Medway identified a high level of demand for affordable housing, at 17,112 over the plan period. The Local Plan needs to be deliverable, and must demonstrate that the policies are viable. Initial analysis indicates that a percentage of 25% affordable housing would be deliverable on developments of over 15 units, taking into account land values and development costs.”²⁶ (our emphasis)

²⁴ Paragraph 43 (iv) (a) and (b), High Court Judgement CO/4055/2014, Satnam Millennium Limited v Warrington Borough Council, 19/02/2015

²⁵ Paragraph 33, page 11, High Court Judgement CO/914/2015, Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government, ELM Park Holdings Ltd, 09/07/2015

²⁶ Paragraph 7.12, page 21, Medway Council Issues and Options Consultation Document, January/February 2016

- 4.71 This is a significant level of affordable housing need, equating to 744 affordable dwellings per annum. To deliver this level of affordable housing in full, at provision of 25%, would require full OAN of circa 3,000 dwellings per annum, 2012-2035. It is accepted that 3,000 dwellings per annum is unrealistic, but a figure in excess of the Council's existing target would help to meet some of this affordable need.

vii) Summary

- 4.72 In summary, the SHENA identifies OAN for Medway as being 1,281 dwellings per annum over the period 2012-2037 based on the results of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates.
- 4.73 This level of housing need has been taken forward in the draft Local Plan to represent need over the period 2012-2035.
- 4.74 OAN of 1,281 dwellings per annum is not considered to represent full OAN for Medway over the plan period (2012-2035) for the following reasons:
- There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dwellings per annum, 2012-2035;
 - The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The GVA SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are 'positively prepared' an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;
 - The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very minimum projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;

- The GVA SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined above we believe to be inappropriate;
- The GVA SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The GVA SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 This review of the Strategic Housing and Economic Needs Assessment (SHENA) has considered the objectively assessed need (OAN) for housing over the period 2012-2037 which has been taken forward in the Medway Council Plan Issues and Options document which is planning for housing needs over the period 2012-2035. **Full OAN is presented in as being 1,281 dwellings per annum over the period 2012-2035.**
- 5.2 In short it is considered the OAN presented in the SHENA plans for very low levels of demographic growth over the Plan period, and does not represent a positively prepared OAN. From the outset, it is important to note how the level of OAN presented in the SHENA is below the PPG's starting point estimate of need – the latest CLG household projection (1,323 dpa, 2012-2035).
- 5.3 The SHENA's OAN conclusion is underpinned by applying 2012-based household formation rates to their preferred population projection (a revised 2012-based ONS SNPP scenario to reflect 2013 and 2014 ONS Mid-Year Population estimates). The 2012-based CLG household projection projects suppressed household formation for those aged 25-44 years of age; those most likely to represent concealed households and first time buyers. Barton Willmore consider it necessary to apply an adjustment to address this suppression and positively prepare the Local Plan, an exercise which has not been undertaken in the SHENA. This approach is supported by recent Planning Inspectorate decisions, which note continuing suppression in the 2012-based CLG projections.²⁷
- 5.4 Notwithstanding that the starting point estimate of OAN (1,323 dpa, 2012-2035) is higher than the Council's proposed level of provision, the starting point estimate should be considered a very minimum for a number of reasons.
- 5.5 The 2012-based CLG household projection is underpinned by the 2012-based Sub National Population Projections (SNPP) which assume very low net international migration to the UK (165,000 people per annum) compared with more recent trends (336,000 people in the last recorded year), an assumption which filters down to local authority level and has been identified by recent Local Plan Inspector's decisions²⁸. PAS Guidance also identifies how the net migration of the 2012-based ONS SNPP may well be an underestimate²⁹.

²⁷ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁸ Paragraph 1.12, page 3, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁹ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

- 5.6 Furthermore, analysis of migration trends has identified that the net migration assumptions of the 2012-based SNPP (840 net migrants per annum, 2012-2037) is low in the context of a more recent 5-year trend given that net migration to Medway has increased over recent years.
- 5.7 However, because it cannot be said with any certainty whether Medway is experiencing a reversal of trend in respect of migration, it is considered reasonable to use the 2012-based SNPP as the most appropriate demographic population projection at this point in time. However, if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase then it would be considered appropriate to change this approach.
- 5.8 With the above points in mind, it is considered that the 2012-based SNPP should provide the very minimum projection of population growth in Medway.
- 5.9 The approach to assessing an uplift for economic growth is considered to be broadly sound. However it is considered that the use of only one forecast is a weak approach. Given the fluctuation of job growth forecasts, Barton Willmore would recommend an average of the three leading forecasting houses; Experian Economics, Cambridge Econometrics, and Oxford Economics. This approach was endorsed by the South Worcestershire Local Plan Inspector.
- 5.10 The SHENA does not suggest a direct uplift to account for worsening market signals. The SHENA acknowledges that some market signals in Medway have worsened to a greater extent than neighbouring local authorities, the south east region, and the national average. The PPG states that an upward adjustment to the demographic starting point should be applied in the event that any of the market signals indicators show a worsening trend. The SHENA considers the level of uplift the economic scenarios provide to be insufficient, however, the 8.6% uplift provided by the CLG 2012-based household projections (adjusted to take account of the 2013 and 2014 MYPE) is considered by the SHENA to provide a significant uplift.
- 5.11 Barton Willmore do not agree. The level of uplift considered by the SHENA is considered in the context of a baseline demographic level of need that is already 10% below the starting point estimate (1,136 compared to 1,270 households per annum) over the period 2012-2037. In effect, the uplift considered by the SHENA still falls below the starting point estimate of need as indicated by the CLG 2012-based household projections, and which Barton Willmore consider to provide a conservative projection of future housing need.
- 5.12 The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local

Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

Way Forward

- 5.13 The PPG states how the OAN should be an unconstrained assessment. The SHENA's approach to OAN is not considered to comply with the PPG in this regard, and sets an OAN below the PPG's starting point estimate. Adjustments for household formation suppression, more recent migration trends, worsening market signals, and affordable housing need indicate a requirement for OAN significantly higher than the starting point estimate of OAN, 1,323 dwellings per annum (2012-2035). The OAN suggested by the SHENA is considered to be wholly inappropriate and not positively prepared, as required by paragraph 182 of the NPPF.

Appendix 3

**Barton Willmore The North Field, Halling: Landscape Appraisal and Green Belt Review
(Barton Willmore, February 2016)**

The North Field, Halling: Landscape Appraisal and Green Belt Review

Prepared on behalf of Redrow Homes Ltd

February 2016

The North Field, Halling: Landscape Appraisal and Green Belt Review

Prepared on behalf of Redrow Homes Ltd

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Checked by:	ET
Authorised by:	MDC

Barton Willmore LLP
7 Soho Square
London
W1D 3QB

Tel: [REDACTED]
Fax: [REDACTED]
Email: [REDACTED]

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ILLUSTRATIVE MATERIAL

Figure 1: Site Context Plan

Figure 2: Site Appraisal Plan

Site Appraisal Photographs (to be read in conjunction with Figure 2)

Site Context Photographs (to be read in conjunction with Figure 1)

1.0 INTRODUCTION

- 1.1 Barton Willmore Landscape LLP (BWLLP) were commissioned by Redrow Homes Ltd to undertake a Landscape and Visual Appraisal of land adjoining North Halling, west of the A228 (Formby Road / Rochester Road) with the purpose of identifying its suitability for residential development and subsequent release from the Green Belt.
- 1.2 The extent of the Site, is illustrated within Figure 1: Site Context Plan. Figure 2: Site Appraisal Plan illustrates an aerial view of the Site.
- 1.3 The Landscape and Visual Appraisal of the Site has been undertaken to:
 - i) Establish the landscape and visual sensitivity of the Site;
 - ii) To assess the Site's contribution to the purposes of the Green Belt, as stated in the National Planning Policy Framework (NPPF) and locally; and
 - iii) Inform any future development of a masterplan for residential development on the Site.

2.0 THE SITE, ITS LOCATION AND CONTEXT

- 2.1 The Site is located within Halling, Kent, on the western slope of the shallow valley formation of the River Medway, which extends northwards, to meet the River Thames at Rochester.
- 2.2 Land use along the western side of the River Medway within the vicinity of the Site and Halling is mixed, and includes industrial buildings, marinas, and residential development. The A228 and Pilgrims Road / Way (west of the Site) provide connectivity to the residential settlements and various land uses along the valley. Beyond this to the west, land rises more steeply, forming a backdrop that is primarily wooded with exposed chalk scarps.
- 2.3 Land use on the eastern side of the River Medway is less urbanised, and comprises primarily agricultural fields and scattered farmsteads. This land is within the Kent Downs AONB.
- 2.4 The Site is adjoined by residential properties on three sides; namely to the north, west and south, accessed from either the A228 or Pilgrims Way / Road.
- 2.5 The Site is approximately 6.8 hectares in area. The Site is an unmanaged, sloping field which falls from 35m AOD in the south-west to 5m AOD in the south-east. It comprises a block of woodland in the southern corner adjoining the A228 and an area of scrub / woodland the south-westernmost corner adjoining Pilgrims Road. Pylons extend along the southern boundary of the Site, beyond which is the recently constructed residential development to the south of the Site ("St Andrews Park").
- 2.6 With regards to relevant landscape and planning policy designations, the Site and / or the surroundings are subject to the following:
- The Site is within the Green Belt;
 - The Kent Downs Area of Outstanding Natural Beauty extends east-west across Kent, however, the River Medway and the urbanised land to the west of the River Medway (which includes Halling and the Site) are excluded from the Kent Downs AONB;
 - The River Medway and the land east of the A228, east of the Site are designated Strategic Gap. The Site is not included within this designation;
 - Much of the woodland which forms the steep wooded slopes to the west of the Site and Halling is designated as ancient woodland. There are no areas of ancient woodland within the Site;
 - The Site is not within or adjoined by a Special Landscape Area / Area of Local Landscape Importance as identified within the Medway Local Plan 2003;
 - There are no listed buildings within the Site or adjoining the Site; and
 - There are no Scheduled Ancient Monuments within the Site or adjoining the Site.

- 2.7 With regards to Public Rights of Way (PRoW), PRoW RS220 extends along the northern boundary of the Site, between the Site and residential properties to the north. Other PRoWs within the vicinity of the Site include PRoW RS201 which extends westwards from Pilgrims Way up the wooded scarp to the south-west of the Site from where elevated views across the River Medway can be obtained, and MR 1 along the eastern bank of the River Medway.
- 2.8 As demonstrated by the above, the Site is located within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is within the Green Belt, however, is surrounded by residential properties on 3 sides (including recent residential development to the south of the Site). With the exception of its Green Belt designation, the Site is not subject to any other landscape-related or planning policy designations.

3.0 RELEVANT PLANNING POLICY

- 3.1 The Site is within the Green Belt, as identified within the Medway Local Plan 2003 (saved Policy BNE 30). The preamble to saved Policy BNE 30 states that:

“In Kent, the Metropolitan Green Belt has helped to preserve the open countryside between the edge of Greater London and the urban areas of Medway, Maidstone, Tunbridge Wells, Sevenoaks and Tonbridge. At a more local level, it has helped maintain the open area between Medway and Gravesend.”

- 3.2 Under National Planning Policy Framework (2012), Green Belt is a functional designation, its purpose being to prevent urban sprawl by keeping land permanently open and as such the essential characteristics of Green Belts are their openness and permanence. Refer to Section 7 ‘Green Belt Review’ for further details.
- 3.3 To the east of the Site (east of the A228) is land designated as Strategic Gap (saved Policy BNE 31). The aim of this policy is, amongst other things, to prevent development that would result in the degradation of the open character or separating function of the land specifically included within the Strategic Gap. Due to the fact that the Site is not within the Strategic Gap, development on the Site would not affect the ability of land within the Strategic Gap to fulfil its function.

4.0 LANDSCAPE CHARACTER

National Landscape Character

Natural England's National Character Area Profile 119: North Downs

4.1 The Site lies within the North Downs Landscape Character Area (LCA), which extends from Guildford to Dover. Key characteristics identified on page 8 include:

- *"...A distinctive chalk downland ridge...*
- *... Chalk soils are predominant across the NCA...*
- *The area is cut by the deep valleys of the Stour, Medway, Darent, Wey and Mole...which contrast with the steep scarp slope...*
- *Woodland is found primarily on the steeper slopes... Well wooded hedgerows and shaws are an important component of the field boundaries, contributing strongly to a wooded character...*
- *Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern... "*

4.2 Key Landscape opportunities within NCA Profile 119 identified on page 54 include:

- *"Protect, conserve, an appropriately manage the highly distinctive chalk cliff coastline...*
- *Protect, conserve and enhance the character of much of the downland landscape devoid of development and urban intrusions... .*
- *...restoring, significantly expanding and relinking the wetland habitats of the Medway Gap...*
- *Manage, conserve, enhance and restore the characteristic pattern of thick well-treed hedgerows and shaws, forming a predominantly irregular field pattern."*

County Landscape Character

Kent County Council's Landscape Assessment of Kent 2004: Kent Downs – Medway, Western and Eastern Scarp.

4.3 The Site lies within the Kent Downs – Medway, Western and Eastern Scarp LCA, and is characterised by:

- Gently undulating arable farmland;
- Quarries;
- Open and wild character on eastern slopes with wide views; and
- Sparse remnant hedges leading up to wooded ridges with wide views from open and wild eastern slopes.

- 4.4 The LCA is described as a generally incoherent landscape of poor condition in which features do not reflect or enhance the landform, and that there are many visual detractors. The Medway Valley is described as having a significant landform, however, the lower slopes are described as unremarkable when considered in isolation. The LCA describes the landscape as open with moderate visibility, and states that hedged field boundaries and woodland are limited. With regard to the sensitivity of the landscape, the LCA describes this as low.
- 4.5 The Landscape Actions described within the LCA include the creation of a landscape framework to provide an urban edge arable fields and other farmland and the creation of shaws or wide hedgerows as enclosure and to provide a network of semi-natural habitats.

Borough Landscape Character

Medway Borough Council's Landscape Character Assessment March 2011: Character Area 39: Halling Quarries

- 4.6 The Site is located within Character Area 39: Halling Quarries. The Landscape Type is Rural Fringe, sub-type Rural fringe with urban/industrial influences. Characteristics are as follows:
- *“Scarp floor with rolling arable fields, interspersed with small settlements, disused quarries, industrial heritage and Peter’s Pit development infrastructure works*
 - *Heavily wooded disused pits fragment character but screen visual interruption*
 - *Blue Lake to south west of Halling Cement Works forms distinctive landscape feature; overhead pylons and cement works are detracting features*
 - *Southern part of character area extends into Tonbridge and Malling”*
- 4.7 The LCA is described as being of moderate condition, with some detracting features and moderate sensitivity. ‘Issues’ identified on page 105 include the new development proposals for Halling Cemex (south of the Site), and loss of rural character from new developments. ‘Guidance’ includes ensuring the use of appropriate native planting to screen new development from footpaths, roads, existing settlements and rural areas.
- 4.8 The substantial housing development that has been constructed within LCA 39 represents a substantial change to the character area. This residential development is not reflected within LCA 39, which was produced prior to the construction of the development.
- ### **Localised Appraisal of the Site and its context**
- 4.9 The published landscape character assessments describe a predominantly chalk landscape, cut by deep valleys including the Medway Valley, where the upper slopes are typically well wooded. More locally, the Medway Valley is described as an incoherent landscape with wide,

open views, and of poor condition. Guidelines include the creation of a strong landscape framework incorporating wide hedgerows and shaws to provide a network of semi-natural habitats, and screening development with appropriate native planting from footpaths, roads, existing settlements and rural areas.

- 4.10 The published assessments broadly reflect the local landscape character of the western edge of the River Medway, which is incoherent and of low sensitivity. At a site specific level, the Site is unmanaged and overgrown, however, does comprise two woodland blocks which should be retained and enhanced as part of any proposed development in accordance with the published guidelines. The guidelines were written prior to the construction of the recent residential development to the south of the Site, which replaced former employment uses.

5.0 VISUAL APPRAISAL

- 5.1 A visual appraisal to ascertain the visibility of the Site in the wider landscape was undertaken in November 2015.
- 5.2 Figure 1: Site Context Plan sets out the viewpoint locations and the extent of visibility of the Site, to be read in conjunction with Site Context Photographs 1 - 10.
- 5.3 Site Context Photograph 1 is taken from the A228 (Formby Road / Rochester Road) looking west towards the north-eastern corner of the Site. The dense boundary vegetation along the A228 largely screens views from this fast moving, heavily trafficked road.
- 5.4 Site Context Photograph 2 is taken from PRow RS220 which adjoins the northern boundary of the Site. PRow RS220 is a narrow path, enclosed to the north by close boarded fencing of the adjoining residential properties and to the south by the scrub and trees which form the northern boundary of the Site. The Site and the recent residential development beyond this are visible, partially screened by the boundary vegetation.
- 5.5 Site Context Photograph 3 is taken from Pilgrims Road, west of the Site at the junction with PRow RS220. The Site is not visible from this location, screened by a block of intervening woodland, the eastern edge of which forms part of the boundary to the Site.
- 5.6 Site Context Photograph 4 is taken from the westernmost edge of the Site, where part of the Site (that comprises a block of woodland) adjoins Pilgrims Road. Due to the dense woodland structure, only a limited part of the rest of the Site is visible from this location.
- 5.7 Site Context Photograph 5 is taken from PRow RS201, south-west of the Site, on elevated land overlooking the Medway Valley. The recently constructed residential development to the south of the Site is visible, beyond which is the River Medway and associated industrial land uses. The woodland blocks within the Site are partially visible from this location.
- 5.8 Site Context Photograph 6 is taken from the A228 south of the Site, within proximity of the recently constructed residential development. The woodland blocks and boundary vegetation along the southern and eastern edges of the Site are visible, screening views into the Site.
- 5.9 Site Context Photographs 7 to 10 are taken from footpaths and roads to the east of the River Medway, looking across the River Medway. Existing development is prominent along the lower slopes of the Medway Valley, beyond which, land rises substantially, forming a backdrop to the view comprising woodland, scattered fields and chalk scarp. The Site is visible from these locations, seen in the context of residential properties to the west (visible above the Site), north and recently constructed properties to the south.

Summary:

- 5.10 The photographs demonstrate that the Site is partially visible from its immediate surroundings, however, views are typically filtered by intervening vegetation. More open views into the Site are obtained from land to the east of the River Medway, however, where these views are obtained, the Site is seen in an urbanised context of the lower slopes of the Medway Valley, beyond which land rises to form a predominantly wooded backdrop to the views.

6.0 OPPORTUNITIES AND CONSTRAINTS

6.1 The following landscape opportunities and constraints should be considered when developing a masterplan for residential development on the Site:

- Existing vegetation structure should be retained, reinforced and enhanced. Implement effective landscape management to ensure thinning, selective felling and replanting to achieve a varied age structure comprising locally indigenous species;
- Development should incorporate tree planting along the contours throughout the scheme, including along roads and within public open spaces within the Site to mitigate views from across the River Medway, in order to reduce the perception of the built form within the Site;
- Built form should follow the contours of the Site to reduce the cut and fill requirements;
- The amenity value of PRow RS220 along the northern edge of the Site should be enhanced, as currently it is a narrow corridor route, separated from the Site by scrub and scattered trees. Pockets of open space and more open views into the Site and the River Medway to the east should be introduced, with the potential for play areas incorporated within a parkland setting along this route; and
- The wider pedestrian connectivity locally should be enhanced, by introducing pedestrian connections between Pilgrims Way to the west of the Site and PRow RS220 to the north of the Site, through the Site.

7.0 GREEN BELT REVIEW

7.1 As illustrated on Figure 1: Site Context Plan much of the undeveloped land to the west of the River Medway, including the Site, is designated as Green Belt land. The Green Belt designation excludes land to the north and south of the Site (which comprises residential development), however, indiscriminately washes over residential properties adjoining the western edge of the Site, and other properties along Pilgrims Way.

7.2 Under National Planning Policy Framework (2012), Green Belt is a functional designation, its purpose being to prevent urban sprawl by keeping land permanently open and as such the essential characteristics of Green Belts are their openness and permanence. More specifically Green Belt serves the following five purposes:

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

7.3 The NPPF states that the key characteristics of the Green Belt are ‘their openness and their permanence,’ (paragraph 79).

7.4 The Site has been assessed in terms of the five purposes set out within the NPPF. In evaluating the contribution of the land to the Green Belt, the Green Belt function of the Site has been ranked within a series of levels or categories, indicating a gradation from none to significant. These thresholds are set out in Table 1 below, while Table 2 sets out an assessment of the Green Belt function of the Site.

Table 1: Contribution of Green Belt function categories

Table Heading	Assessment
Significant	Significant landscape and visual contribution towards purpose of Green Belt
Some	Some landscape and visual contribution towards purpose of Green Belt
Limited	Limited landscape and visual contribution towards purpose of Green Belt
Small	Small landscape and visual contribution towards purpose of Green Belt
None	No landscape and visual contribution towards purpose of Green Belt

- 7.5 An assessment has been made of the openness of the Green Belt in this particular location and to what extent the removal of the Site would have on the perception of openness in the remaining designated area.

Definitions

- 7.6 When considering the ability of the Site to meet each of the purposes of the Green Belt, the following definitions should be considered.

Sprawl

- 7.7 Disorganised and unattractive extension to developed area (perhaps lacking defensible boundary), spread out over a large area in an untidy or irregular way. This takes into account the local settlement pattern.

Encroachment

- 7.8 The gradual advancement of development beyond an acceptable or established limit. This takes into account the condition of the land within the Site and the value it contributes to Green Belt (countryside).

Defensible boundaries

- 7.9 The NPPF states that, when choosing boundaries, 'local authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent,' (paragraph 85).

Table 2: The Site's Contribution to the Purposes of the Green Belt

Green Belt Function	Assessment	Green Belt Contribution (None / Very Small / Limited / Some / Significant)
To check the unrestricted sprawl of large built-up areas	<p>The Site is enclosed and adjoined by residential development to the north, west and south and the A228 to the east, and therefore development on the Site would not result in sprawl, as is contained by development that surrounds it.</p> <p>There is an opportunity to reinforce the existing landscape structure through the enhancement of the landscape buffers around the Site, comprising native species hedgerows and trees, which would provide a defined edge to the development, whilst also contributing positively to local landscape character.</p> <p>Therefore, it is considered that the Site has the ability to absorb development without contributing to an increase in the extent of unrestricted sprawl of the</p>	None

Green Belt Function	Assessment	Green Belt Contribution (None / Very Small / Limited / Some / Significant)
	existing settlement pattern.	
To prevent neighbouring towns merging into one another	<p>Due to the urbanised nature of the lower valley slopes on the western side of the River Medway, there is no clear distinction between settlements locally.</p> <p>Policy BNE 30 of the Medway Local Plan states that the Metropolitan Green Belt has helped to maintain the open area between Medway and Gravesend, and the open area between London and other urban areas of Medway, Maidstone, Tunbridge Wells, Sevenoaks and Tonbridge. The geographic location of the Site is not applicable to these functions and cannot be described as 'open countryside'.</p>	None
To assist in safeguarding the countryside from encroachment	<p>The variety of land uses lead to an incoherent character locally with strong urban fringe characteristics, and as demonstrated in the visual appraisal section, visibility into the Site is limited and filtered due to intervening vegetation and built form, with the exception of the longer views from the east of the River Medway, from which the strong urban fringe character of this location is evident.</p> <p>As a result the contribution the Site makes to the 'openness' of Green Belt is limited.</p> <p>Furthermore, the perception of 'countryside' is further reduced by the presence of the fast-moving A228 road adjoining the eastern edge of the Site which is audibly intrusive.</p> <p>The introduction of development would result in the replacement of a field with built form, however, the effect would be perceived within a limited visual envelope, constrained by local topography, intervening vegetation and built form, and seen in the context of the Site's urbanised surroundings.</p>	Limited
To preserve the setting and special character of historic towns	The Site is not within, or visible from any historic towns, and is not within or visible from any Conservation Area. Therefore, the development of the Site would have no effect on the setting or character of any historic towns.	None

7.10 The fifth NPPF Green Belt function to assist in urban regeneration is not a landscape and visual consideration. Should the Site be brought forward for redevelopment, this would not prejudice derelict land coming forward in the future.

7.11 The above demonstrates that due to the urbanised context of the Site's surroundings, the Site makes little to no contribution to the purposes of Green Belt, and therefore that the Site could be released from the Green Belt, and residential development accommodated within the Site.

8.0 SUMMARY AND CONCLUSION

The Site and Context

- 8.1 The Site is located within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is within the Green Belt, however, is surrounded by residential properties on 3 sides including recent residential development to the south of the Site. The A228 and Pilgrims Road / Way provide connectivity to the residential settlements and various land uses along the valley. Beyond this to the west, land rises more steeply, forming a backdrop that is primarily wooded with exposed chalk scarps.
- 8.2 With the exception of being within the Green Belt, the Site is not subject to landscape-related or planning policy designations.
- 8.3 The Site is approximately 6.8 hectares in area. The Site is an unmanaged, sloping field which falls from 35m AOD in the south-west to 5m AOD in the south-east. It comprises a block of woodland in the south-eastern corner adjoining the A228 and an area of scrub / woodland the south-westernmost corner adjoining Pilgrims Road / Way. Pylons extend along the southern boundary of the Site, beyond which is the recently constructed residential development to the south of the Site ("St Andrews").

Landscape Character

- 8.4 The published landscape character assessments describe a predominantly chalk landscape, cut by deep valleys including the Medway Valley, where the upper slopes are typically well wooded. More locally, the Medway Valley is described as an incoherent landscape with wide, open views, and of poor condition. Guidelines include the creation of a strong landscape framework incorporating wide hedgerows and shaws to provide a network of semi-natural habitats, and screening development with appropriate native planting from footpaths, roads, existing settlements and rural areas.
- 8.5 The published assessments broadly reflect the local landscape character of the western edge of the River Medway, which is incoherent and of low sensitivity. At a site specific level, the Site is unmanaged and overgrown, however, does comprise two woodland blocks which should be retained and enhanced as part of any proposed development in accordance with the published guidelines. The guidelines were written prior to the construction of the recent residential development to the south of the Site, which replaced former employment uses.

Visual Appraisal

- 8.6 The Site Context Photographs which accompany this Appraisal demonstrate that the Site is partially visible from its immediate surroundings, however, views are typically filtered by intervening vegetation. More open views into the Site are obtained from land to the east of the River Medway, however, where these views are obtained, the Site is seen in an urbanised context of the lower slopes of the Medway Valley, beyond which land rises to form a predominantly wooded backdrop to the views.

Opportunities and Constraints

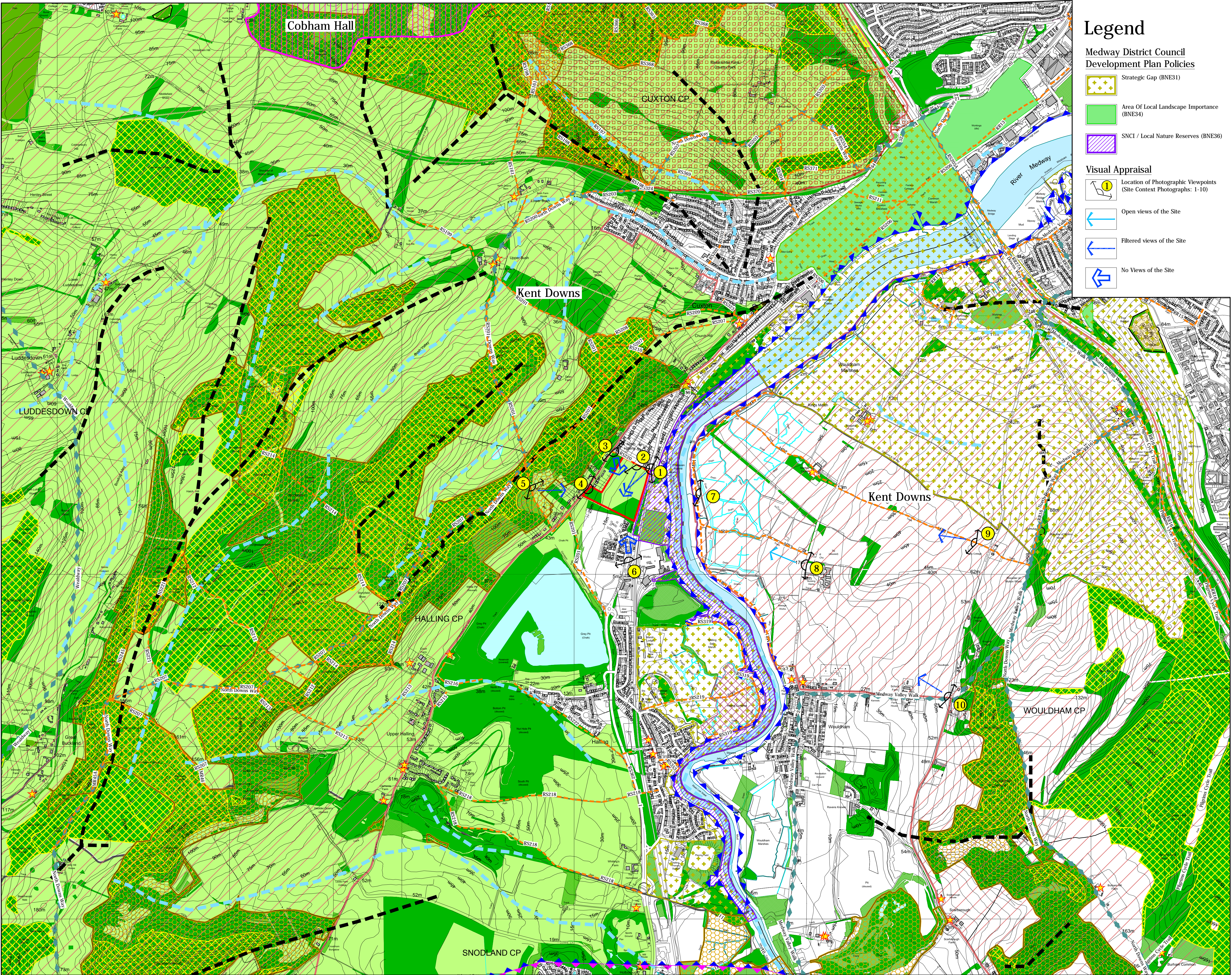
- 8.7 The following landscape opportunities and constraints should be taken into consideration when developing a masterplan for development on the Site, to help assimilate the development into the Site and its context:
- Retain and enhance existing vegetation including the woodland blocks within the Site to enhance visual amenity and biodiversity;
 - Incorporate tree planting throughout the scheme to reduce the perception of built form within the Site, particularly from the eastern side of the River Medway and ensure that development follows the contours of the Site;
 - Enhance the amenity value of the footpath (PRoW RS220) which adjoins the northern edge of the Site by introducing new pockets of open space and along the route and managing the vegetation to allow more open views towards the River Medway; and
 - Enhance local pedestrian connectivity, by incorporating new pedestrian routes through the Site from Pilgrims Road / Way in the south-west to PRoW RS220 in the north.

Green Belt Review

- 8.8 The Site has been assessed in terms of the five purposes set out within the NPPF. As demonstrated within the table in Section 7 of this Appraisal, the Site makes **no contribution** to checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns); makes a **limited contribution** to assisting in safeguarding the countryside from encroachment; and **would not prejudice** derelict land coming forward in future for development.
- 8.9 The above demonstrates that the Site could be released from the Green Belt, and residential development accommodated within the Site.

Conclusion

- 8.10 As a result of the above considerations it is concluded that sympathetic development within the Site would be acceptable in landscape and visual terms and would result in limited to no effect on the function of the Green Belt. The Site could successfully accommodate residential development, assimilated into the existing development pattern of its urbanised surroundings, which includes residential development on 3 sides of the Site.



Legend

Medway District Council Development Plan Policies

- Strategic Gap (BNE31)
- Area Of Local Landscape Importance (BNE34)
- SNCI / Local Nature Reserves (BNE36)

Visual Appraisal

- Location of Photographic Viewpoints (Site Context Photographs: 1-10)
- Open views of the Site
- Filtered views of the Site
- No Views of the Site

- The scaling of this drawing cannot be assured
- Revision Date Dm Ckd
- Site Boundary
- Existing Woodlands, Copses and Tree Belts ^
- Existing Water Courses and Features ^
- Contours/Spot Heights (Metres AOD) ^
- Ridgelines
- Valleys
- Public Rights of Way *
- Distance Walks #
- Listed Buildings ~
- Scheduled Monument ~
- Registered Parks and Gardens
Cobham Hall
- Ancient Woodland #
- Area of Outstanding Natural Beauty
Kent Downs
- Green Belt ^^
- Countryside Rights of Way Access Areas
- Sites of Special Scientific Interest
- Country Park
- National Character Area Profiles #
- 119: North Downs
(The Site is within this NCA)
- 120: Wealden Greensand

Sources:

- GIS Mapping
- Natural England GIS Data Set
- Historic England National Monument Record GIS Data Set
- Medway Deftable Map
- Sustrans National Cycle Network GIS Data
- Department for Communities and Local Government GIS Data

Data collected for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

Figure 1

Project
North Field,
Halling, Kent
Drawing Title
Site Context Plan

Date 08.12.2015	Scale 1:10,000 @A1 1:20,000 @A3	Drawn by ZR	Check by ET
Project No 23486	Drawing No L1		Revision -

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Date

Drn

Ckd

LEGEND

Site Boundary

Existing Water Courses and Features ^

Contours/Spot Heights (Metres AOD) ^

Public Rights of Way *

Location of Photographic Viewpoints (Site Appraisal Photographs: A-C)

Sources:

^ OS Mapping

* Meadway Definitive Map

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

Figure 2

Project
North Field,
Halling, Kent
Drawing Title
Aerial Plan of Site

Date	Scale	Drawn by	Check by
08.12.2015	1:2,000 @A3	ZR	ET
Project No	Drawing No	Revision	
23486	L2	-	

0

20

40

60

80

100m

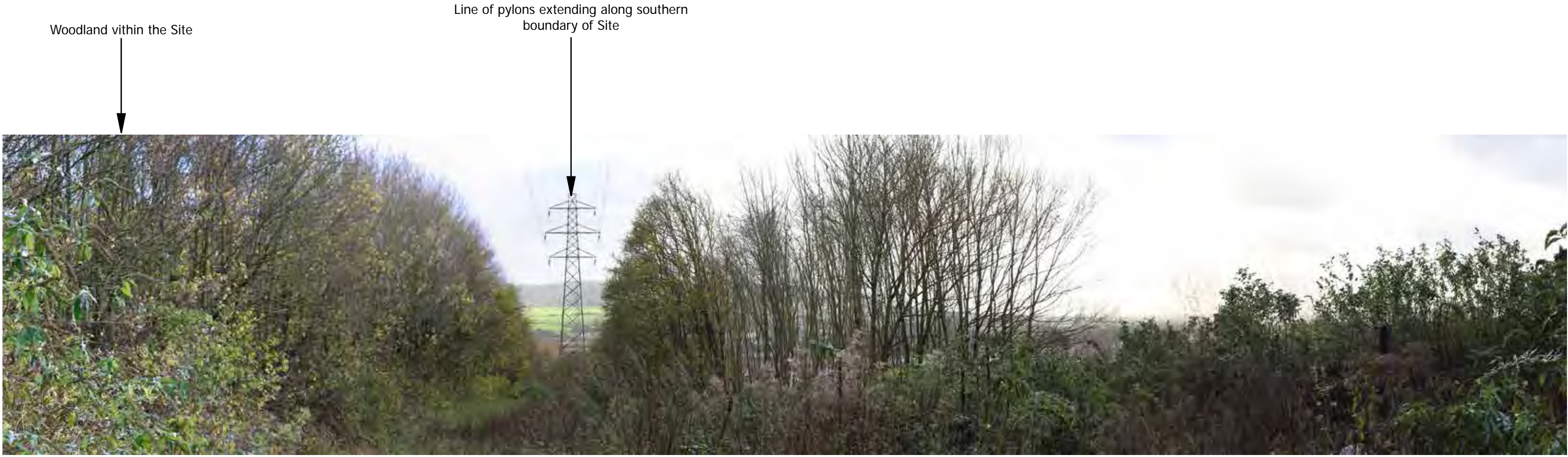
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SITE APPRAISAL PHOTOGRAPH A : VIEW FROM SOUTH-WESTERN PART OF SITE, LOOKING SOUTH-EAST

Date Taken: November 2015



SITE APPRAISAL PHOTOGRAPH B : VIEW SOUTH FROM SITE TOWARDS FORMER CEMENT WORKS AND ADJOINING RESIDENTIAL DEVELOPMENT (DURING CONSTRUCTION)

Date Taken: March 2014



SITE APPRAISAL PHOTOGRAPH C : VIEW FROM THE NORTHERN BOUNDARY OF THE SITE, LOOKING SOUTH-EAST

Date Taken: March 2015

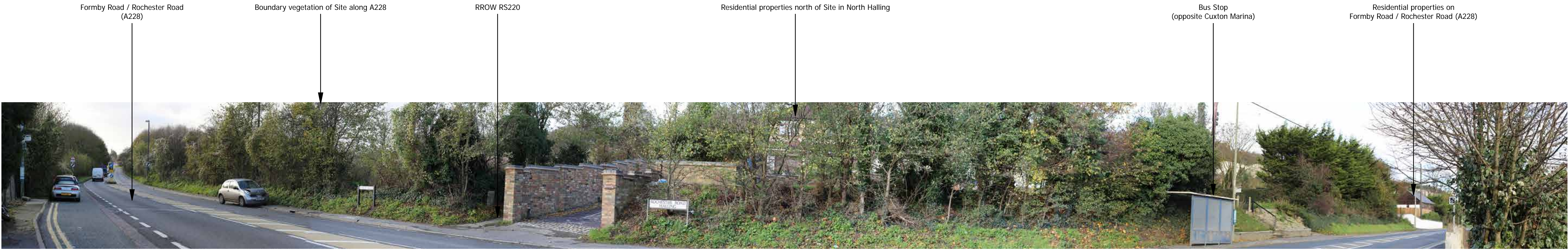
**NORTH FIELD,
HALLING, KENT**

**SITE APPRAISAL
PHOTOGRAPHS: A - C**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

PROJECT NUMBER: 23486

**BARTON
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SITE CONTEXT PHOTOGRAPH 1: VIEW FROM ROCHESTER ROAD/ FORMBY ROAD (A228), LOOKING WEST
Distance: 19m



SITE CONTEXT PHOTOGRAPH 2: VIEW FROM PROW RS220
Distance: 2m



SITE CONTEXT PHOTOGRAPH 3: VIEW FROM PILGRIMS ROAD / WAY, LOOKING SOUTH-EAST
Distance: 71m

**NORTH FIELD,
HALLING, KENT**

**SITE CONTEXT
PHOTOGRAPHS: 1 - 3**
**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**
DATE TAKEN: NOV 2015
PROJECT NUMBER: 23486



SITE CONTEXT PHOTOGRAPH 4: VIEW FROM PILGRIMS ROAD / WAY, LOOKING EAST

Distance: 5m



SITE CONTEXT PHOTOGRAPH 5: VIEW FROM PROW RS201, LOOKING EAST

Distance: 310m



SITE CONTEXT PHOTOGRAPH 6: VIEW FROM FORMBY ROAD / ROCHESTER ROAD (A228), LOOKING NORTH

Distance: 240m

**NORTH FIELD,
HALLING, KENT**

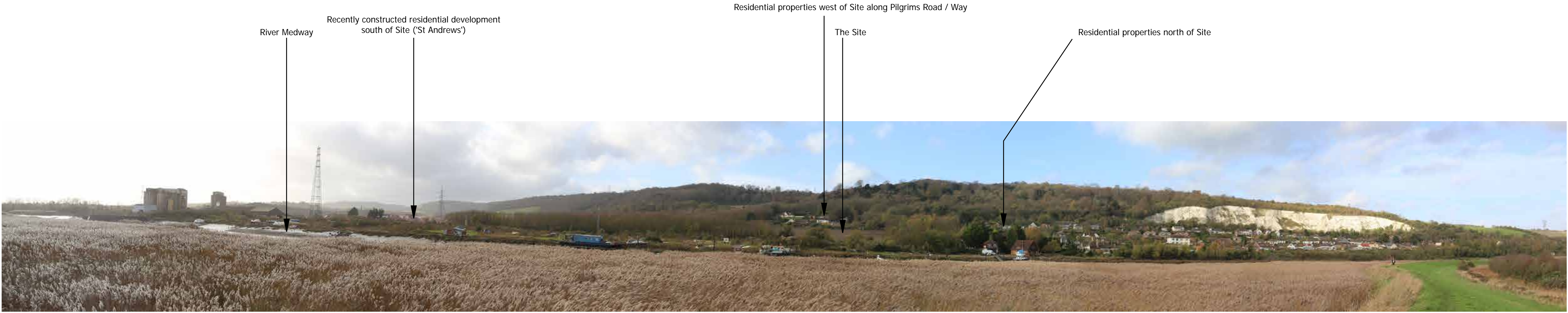
**SITE CONTEXT
PHOTOGRAPHS: 4 - 6**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

DATE TAKEN: NOV 2015

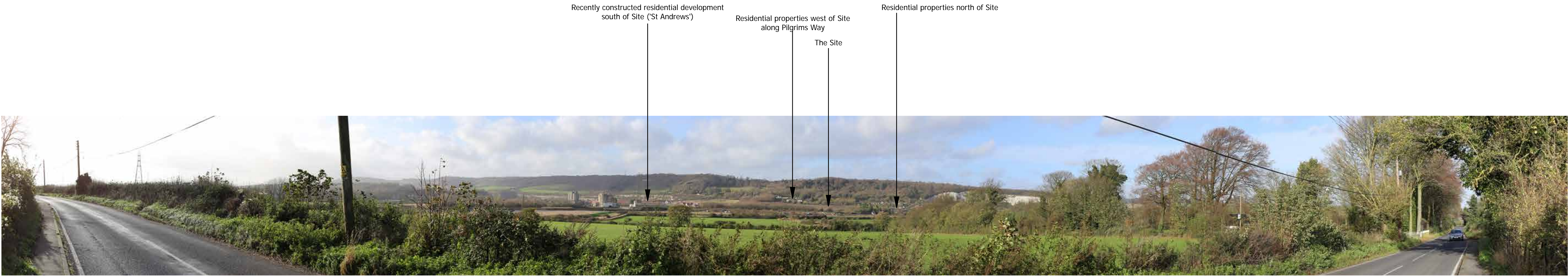
PROJECT NUMBER: 23486

**BARTON
WILLMORE**



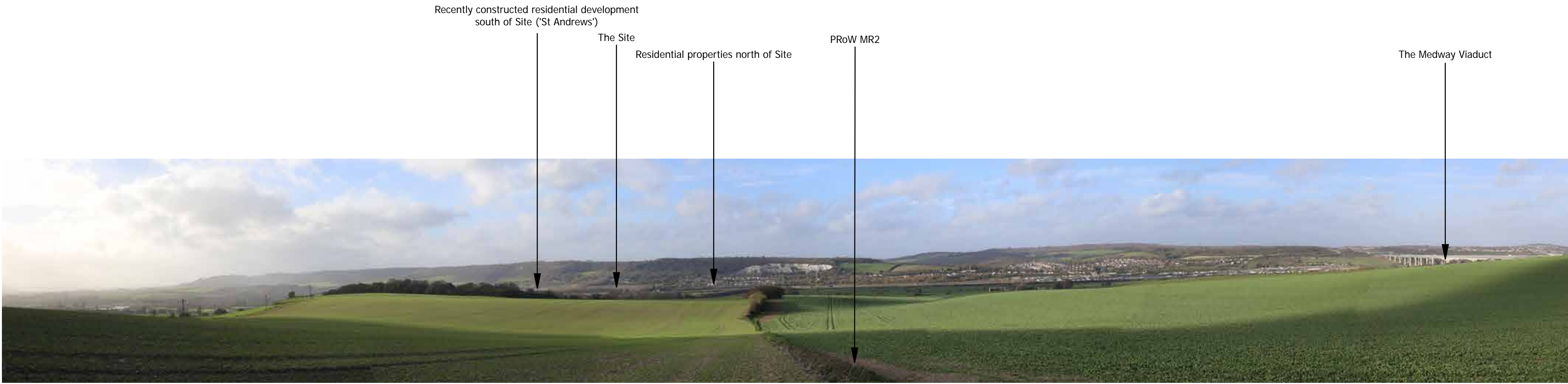
SITE CONTEXT PHOTOGRAPH 7: VIEW FROM AONB (KENTS DOWNS), LOOKING WEST

Distance: 327m



SITE CONTEXT PHOTOGRAPH 8: VIEW FROM WOULDHAM ROAD, LOOKING NORTH-WEST

Distance: 1.03km



SITE CONTEXT PHOTOGRAPH 9: VIEW FROM PROW/MR2, LOOKING WEST

Distance: 1.95km

**NORTH FIELD,
HALLING, KENT**

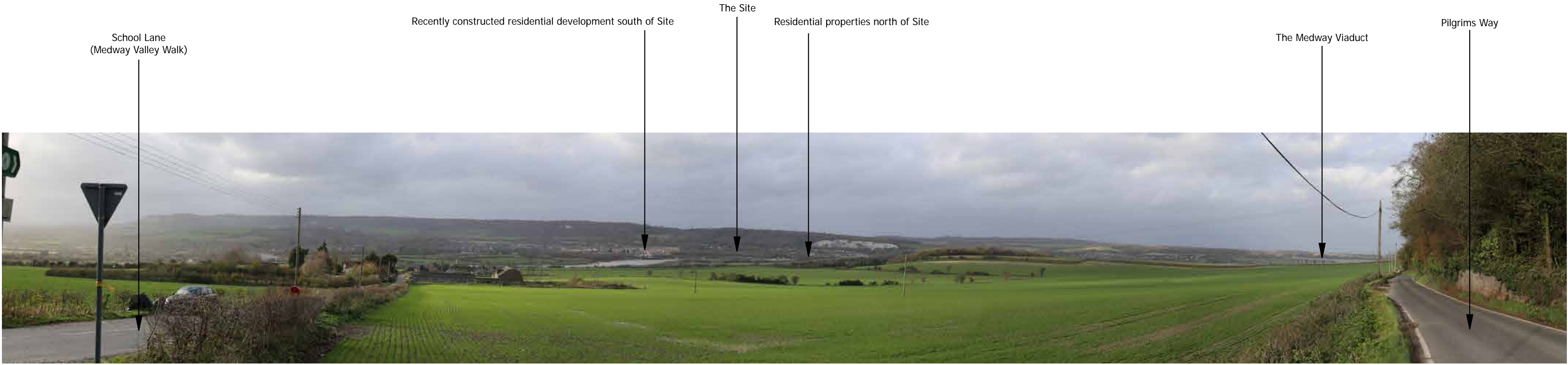
**SITE CONTEXT
PHOTOGRAPHS: 7 - 9**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

DATE TAKEN: NOV 2015

PROJECT NUMBER: 23486

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SITE CONTEXT PHOTOGRAPH 10: VIEW FROM PILGRIMS WAY, LOOKING NORTH-WEST
Distance: 2.1m

APPENDIX 4

Landscape Appraisal and Green Belt Review (April 2018)

The North Field, Halling: Landscape Appraisal and Green Belt Review

Prepared on behalf of Redrow Homes Ltd

June 2018

The North Field, Halling: Landscape Appraisal and Green Belt Review

Prepared on behalf of Redrow Homes Ltd

Project Ref:	23486/A5
Status:	FINAL
Issue/ Rev:	-
Date:	June 2018
Prepared by:	David Hope
Checked by:	Greg Mahon
Authorised by:	Matthew Chard

Barton Willmore LLP
7 Soho Square
London
W1D 3QB



Ref: 23486/A5
Date: June 2018
Status: FINAL

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ILLUSTRATIVE MATERIAL

- Figure 1: Site Context Plan
- Figure 2: Aerial Plan of Site
- Figure 3: Topographical Features Plan
- Site Appraisal Photographs A - C
- Site Context Photographs 1 - 11

1.0 INTRODUCTION

- 1.1 Barton Willmore Landscape Planning and Design (BWLPD) was commissioned by Redrow Homes Ltd to undertake a Landscape and Visual Appraisal and Green Belt Review (LVA GBR) of the land adjoining North Halling, west of the A228 Formby Road / Rochester Road, with the purpose of identifying its suitability for residential development and release from the Green Belt.
- 1.2 The land being considered for release from the Green Belt and residential development is referred to as the 'Site'. The location and extent of the Site is illustrated within **Figure 1: Site Context Plan** and **Figure 2: Aerial Plan of Site**.
- 1.3 This report details the landscape character, landscape value and visual envelope of the Site, and provides an assessment of the contribution that the Site makes towards the purposes and function of the Green Belt, as set out in Paragraph 80 of the National Planning Policy Framework (NPPF).
- 1.4 The objectives of this study are to:
- Assess the landscape characteristics and quality of the Site and its surrounding and function within the landscape;
 - Assess the visibility of the Site and the nature and quality of the existing views from the surrounding area;
 - Consider the policy basis for the Green Belt designation that applies to the area;
 - Assess the contribution of the Site in response to its Green Belt function and its potential to be released from the Green Belt; and
 - Identify opportunities and constraints to development on the Site, from a landscape and visual perspective.
- 1.5 Supporting illustrative information is presented in the following plans and photographs:
- Figure 1: Site Context Plan;
 - Figure 2: Aerial Plan of Site;
 - Figure 3: Topography Plan;
 - Site Appraisal Photographs A - C; and
 - Site Context Photographs 1 - 11.

Previous Work

- 1.6 A previous Landscape and Visual Appraisal and Green Belt Review was undertaken for the Site by BWLPD in February 2016, which concluded that the Site could successfully accommodate residential development with limited to no effect on the Green Belt. The findings of this LVA

GBR (as presented below) largely align with the findings of the previous work, albeit using an updated version of the Green Belt methodology that aligns with current best practice.

2.0 METHODOLOGY

- 2.1 Landscape and Visual Appraisal (LVA) and Green Belt Review (GBR) are separate assessments. However, the information ascertained through the LVA is used to aid the assessment of the contribution that the Site makes towards the purposes of the Green Belt, including through the assessment of the relationship of the Site with the existing built form; the identification of defensible boundaries that may prevent sprawl; the physical and visual encroachment into the countryside; and the physical and visual merging of settlements.

Methodology for Landscape and Visual Appraisal

- 2.2 The LVA has been prepared with reference to the Guidelines for Landscape and Visual Impact Assessment 3rd Edition, prepared by the Landscape Institute and the Institute of Environmental Management and Assessment ¹.
- 2.3 A desktop review of the study area was undertaken to identify landform, landscape features, landscape designations and relevant landscape policy, and to review published landscape character information. This information was used as the initial basis against which to appraise the Site. A visit to the Site and surroundings was subsequently undertaken in April 2018 to verify the desk-based review and add further information to the landscape and visual context of the Site.
- 2.4 A description of the existing land use of the study area is provided and includes reference to existing areas of settlement, transport routes and vegetation cover, as well as local landscape designations, elements of cultural and heritage value, and any local landmarks or tourist destinations. These factors combine to provide an understanding of landscape value and sensitivity and provide an indication of particular key views and viewpoints that are available to visual receptors.
- 2.5 To determine the extent of visual influence, a visual appraisal of the Site was undertaken to consider the nature of existing views from publicly accessible viewpoints including roads, Public Rights of Way (PRoW) and public open spaces. Consideration was given to private views, however access to private properties was not obtained. Views were considered from all directions and from a range of distances. The viewpoints chosen are not intended to be exhaustive, but rather to represent the potential views obtained towards the Site in order to identify areas of higher visual sensitivity.

¹ Institute for Environmental Management and Assessment and the Landscape Institute (2013) Guidelines for Landscape and Visual Impact Assessment 3rd Edition

2.6 The inherent sensitivity of the Site is considered in terms of the following:

- **Landscape Character:** i.e. landform, vegetation cover, land use, scale, state of repair of individual elements, representation of typological character, enclosure pattern, form/line and movement;
- **Landscape Value:** i.e. national designations, local designations, sense of tranquillity/remoteness, scenic beauty and cultural associations; and
- **Visual Influence:** i.e. landform influences, tree and woodland cover, numbers and types of residents, numbers and types of visitors and scope for mitigating potential for visual impacts.

2.7 A more detailed landscape appraisal of the Site was then undertaken, which in combination with the wider visual appraisal, assists in the identification of opportunities and constraints that would assist in defining the boundaries for potential future development, and thus an amended Green Belt boundary.

Methodology for Green Belt Review

Assessment against the purposes of the Green Belt

2.8 The Site was assessed against the first four purposes of the Green Belt as set out in Paragraph 80 of the NPPF, which are:

- *"To check the unrestricted sprawl of large built-up areas;*
- *To prevent neighbouring towns from merging in to one another;*
- *To assist in safeguarding the countryside from encroachment; and*
- *To preserve the setting and special character of historic towns.*

2.9 The fifth purpose of the Green Belt "*to assist in urban regeneration by encouraging the recycling of derelict and other urban land*" is not a landscape and visual consideration. Should the Site be brought forward for redevelopment, this would not prejudice derelict, or other urban land, coming forward in the future. The principle of retaining land within the Green Belt holds true for all areas within the Green Belt, therefore the Site is considered to make the same contribution to this purpose of the Green Belt as any other land parcel within the Green Belt. Accordingly, no additional specific assessment is undertaken.

2.10 The NPPF states in Paragraph 83 that "*once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan*".

- 2.11 The NPPF seeks to align Green Belt boundary reviews with sustainable patterns of development, as set out in Paragraph 84, with Local Planning Authorities encouraged to ***"consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary"***.
- 2.12 In this regard, where a given area of land contributes poorly towards meeting the purposes of the Green Belt and its release would contribute positively to promoting a sustainable development pattern, this may be considered to impact towards 'exceptional circumstances' and the Green Belt boundary should be reviewed accordingly. The criteria used within this LVA GBR to assess the contribution made to the first four purposes of the Green Belt is set out in Table 2.1 below.

Table 2.1: Purposes of the Green Belt – Assessment Criteria

Purpose	Criteria
Check the unrestricted sprawl of large built-up areas	<p>Considerable - Development of the land would be strongly perceived as sprawl, as it is not contained by robust physical features and/or would extend the settlement pattern in an incoherent manner.</p> <p>Some - Development of the land would be perceived as sprawl, as it is partially contained by robust physical features and/or would extend the settlement pattern in a moderately incoherent manner.</p> <p>Limited - Development of the land would be perceived as sprawl to a limited degree, as it is largely contained by robust physical features and/or would extend the settlement pattern in a broadly coherent manner.</p> <p>None - Development of the land would not be perceived as sprawl as it is well contained by robust physical features and/or is entirely set within the existing coherent settlement pattern.</p>
Prevent neighbouring towns from merging	<p>Considerable - Development would result in the physical unification of two (or more) towns.</p> <p>Some - Development would substantially reduce the physical or perceived separation between towns.</p> <p>Limited - Development would result in a limited reduction in the physical or perceived separation between towns.</p> <p>None - Development would not physically or perceptually reduce the separation between towns.</p>
Assist in safeguarding the countryside from encroachment	<p>Considerable: No built or engineered forms present and perceived as inherently undeveloped and/or rural in character. Development would potentially result in a strong urbanising influence over the wider landscape.</p> <p>Some: Built or engineered forms present but retaining a perception of being predominantly undeveloped and/or rural in character. Development would potentially result in a moderate urbanising influence over the wider landscape.</p> <p>Limited: Built or engineered forms present and a minimal perception of being undeveloped and or rural in character. Development would potentially result in a limited urbanising influence over the wider landscape.</p> <p>None: Built or engineered forms present and perceived as inherently developed and/or urban in character. Development would not result in urbanising influence over the wider landscape.</p>

Purpose	Criteria
Preserve the setting and special character of historic towns	<p>Considerable: Strong physical and/or visual and/or character connection with the historic part of a town. May be within or adjoining the historic part of a town.</p> <p>Some: Partial physical and/or visual and/or character connection with the historic part of a town, whilst not adjacent to it.</p> <p>Limited: weak physical and/or visual and/or character connection with the historic part of a town.</p> <p>None: No physical and/or visual and/or character connection with the historic part of a town.</p>

Assessment against the characteristics of the Green Belt

- 2.13 The NPPF states that the key characteristics of the Green Belt are "***their openness and their permanence***". In defining new boundaries to the Green Belt, it must be ensured that these characteristics are not diminished for the areas remaining within the Green Belt designation as a direct result of development. An assessment is made of the openness of the Green Belt in the vicinity of the Site and to what extent the Sites' removal could have on the perception of openness in the remaining designated area.
- 2.14 In addition, the relationship of the Site to existing elements and visual barriers, such as ridgelines, roads and areas of notable vegetation is demonstrated. This assists in the assessment of impact of potential development upon the openness of the remaining designated area and assists in the identification of boundaries that may be considered to be 'permanent'.
- 2.15 Table 2.2 below provides a glossary of the terms used in relation to the Green Belt assessment.

Table 2.2: Definitions

Term	Definition
Brownfield	(see <i>Previously Developed Land</i>)
Character	A distinct, recognisable and consistent pattern of elements in the landscape that differentiates one area from another.
Coalescence	The physical or visual linkage of large built-up areas.
Countryside	In planning terms: land outwith the settlement boundary; and/or, In broader terms: the landscape of a rural area.
Defensible Boundary	A physical feature that is readily recognisable and likely to be permanent. The NPPF states that " local authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent ". With regard to physical barriers, these would include roads, railway lines, large woodland or significant topographical features.
Encroachment	Advancement of a large built-up area beyond the limits of the existing built-up area into an area perceived as countryside.

Term	Definition
Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Greenfield	Land (or a defined site) usually farmland, that has not previously been developed.
Large built-up area	An area that corresponds to the settlements identified in the relevant Local Plan, including those inset from the Green Belt.
Merging	(see <i>Coalescence</i>)
Neighbouring Town	Refers to settlements identified within the relevant Local Plan and those within the neighbouring authorities' administrative boundary that abut the Green Belt.
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Openness	Openness is taken to be the degree to which an area is primarily unaffected by built features, in combination with the consideration of the visual perception of built features. In order to be a robust assessment, this should be considered from first principles, i.e. acknowledging existing structures that occur physically and visually within the area, rather than seeing them as being 'washed over' by the existing Green Belt designation.
Previously Developed Land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private gardens, parks, recreation grounds and allotments and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Sprawl	The outward spread of a large built-up area in an incoherent, sporadic, dispersed or irregular way.

3.0 RELEVANT PLANNING POLICY

National Policy

- 3.1 The NPPF promotes a presumption in favour of sustainable development, defined as ***"meeting the needs of the present without compromising the ability of future generations to meet their own needs"***, and providing it is in accordance with the relevant up-to-date Local Plan, and policies set out in the NPPF including those identifying restrictions with regard to designated areas.
- 3.2 The NPPF states that ***"the purpose of the planning system is to contribute to the achievement of sustainable development"*** and that there are ***"three dimensions to sustainable development: economic, social and environmental"***. The role the environment plays is described as ***"contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use of natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy"***.
- 3.3 Twelve Core Planning Principles are set out, of which the following are relevant to the consideration of landscape and visual matters, stating that planning should:
- ***"not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;***
 - ***always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;***
 - ***take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;***
 - ***contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; and***
 - ***conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations."***
- 3.4 Section 7 of the NPPF provides guidance on ensuring the delivery of good design. The NPPF requires development proposals to respond to local character and be visually attractive, as well as emphasising the need to integrate development proposals into the natural environment.

3.5 Paragraph 58 of the NPPF states that planning policies and decisions should aim to ensure that developments:

- ***"will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;***
- ***establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;***
- ***optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;***
- ***respond to local character and history and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;***
- ***create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and***
- ***are visually attractive as a result of good architecture and appropriate landscaping".***

3.6 Paragraph 61 of the NPPF states that:

"...planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment."

3.7 Section 9 of the NPPF relates to the protection of Green Belt land, with Paragraph 79 noting that ***"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open"***. Paragraph 80 of the NPPF sets out the five purposes of the Green Belt, which are replicated in Paragraphs 2.8 - 2.9 of this report.

3.8 Paragraph 83 considers alterations to the designated Green Belt boundary, stating:

"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their permanence in the long term, so that they should be capable of enduring beyond the plan period."

3.9 This is supported by Paragraph 85 of the NPPF that states with regard to defining boundaries that local planning authorities should ***"not include land which it is unnecessary to keep permanently open"*** and to ***"define boundaries clearly, using physical features that are readily recognisable and likely to be permanent"***.

- 3.10 Furthermore, Paragraph 85 notes that local planning authorities should ***"satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period"*** and ***"where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period"***.
- 3.11 With respect to the natural environment, Paragraphs 109 - 125 of the NPPF focus on the conservation and enhancement of the local and natural environment. The NPPF states that the planning system should contribute to and enhance the local environment by inter-alia ***"protecting and enhancing valued landscapes, geological conservation interests and soils"***.
- 3.12 Paragraph 110 of the NPPF sets out that the aim in preparing plans for development should be to minimise adverse effects on the local and natural environment, and that plans should allocate land with the least environmental or amenity value.
- 3.13 Paragraph 114 notes that furthermore, Local Planning Authorities should:

"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."

Local Policy

- 3.14 The Local Plan for Medway currently covers Development Plan policies from a number of plans, including the Medway Local Plan 2003.

Medway Local Plan 2003

- 3.15 The Medway Local Plan 2003 was adopted on 14 May 2003. The following saved policies are relevant:

Policy S4: Landscape and Urban Design

"A high quality of built environment will be sought from new development, with landscape mitigation where appropriate. Development should respond appropriately to its context, reflecting a distinct local character."

Policy BNE1: General Principles for Built Development

"The design of development ... should be appropriate in relation to the character, appearance and functioning of the built and natural environment by: ... (i) being satisfactory in terms of use, scale, mass, proportion, details, materials, layout and siting; and

*(ii) respecting the scale, appearance and location of buildings, spaces and the visual amenity **of the surrounding area...**"*

Policy BNE6: Landscape Design

*"Major developments should include a structural landscaping **scheme to enhance the character of the locality... Detailed landscape schemes ... should have regard to the following factors: ...(ii) include** planting of a size, scale and form **appropriate to the location and landform ... (iv) retain important existing landscape features, including trees and hedgerows**"*

Saved Policy BNE25: Development in the Countryside

"Development in the countryside will only be permitted if:

- i) it maintains, and wherever possible enhances, the character, amenity and functioning of the countryside, including the river environment of the Medway and Thames, it offers a realistic chance of access by a range of transport modes..."*

- 3.16 Policy BNE25 defines countryside as **"...that land outside the urban and rural settlement boundaries defined on the proposals map"**. Based on this the Site falls within land classified as countryside.

Saved Policy BNE 30 Metropolitan Green Belt

- 3.17 The Site is located within the Green Belt. The preamble to saved Policy BNE 30 states that:

"In Kent, the Metropolitan Green Belt has helped to preserve the open countryside between the edge of Greater London and the urban areas of Medway, Maidstone, Tunbridge Wells, Sevenoaks and Tonbridge. At a more local level, it has helped maintain the open area between Medway and Gravesend."

- 3.18 Under National Planning Policy Framework (2012) , Green Belt is a functional designation, its purpose being to prevent urban sprawl by keeping land permanently open and as such the essential characteristics of Green Belts are their openness and permanence. Refer to Section 2 'Methodology' and Section 7 'Green Belt Review' for further details.

- 3.19 Policy BNE30 states:

"Within the Metropolitan Green Belt, as defined on the proposals map, there is a general presumption against inappropriate development. Development will not be permitted unless the following objectives are fulfilled:

- i) *it is designed and sited so that the open character of the area is maintained; and*
- ii) *it accords with the purposes of including land in the Green Belt.*
- iii) *new buildings will only be permitted for the following purposes:*
 - a) *agriculture or forestry; or*
 - b) *essential small scale facilities for outdoor sport or recreation, for cemeteries or other land uses that fulfil the above objectives; or*
 - c) *a limited extension, alteration or replacement of an existing building; or*
 - d) *limited infilling within the village boundary of Upper **Halling...***

Saved Policy BNE 31: Strategic Gap

- 3.20 To the east of the Site (east of the A228) is land designated as Strategic Gap. The aim of this policy is, amongst other things, to prevent development that would result in the degradation of the open character or separating function of the land specifically included within the Strategic Gap. Due to the fact that the Site is not within the Strategic Gap, development on the Site would not affect the ability of land within the Strategic Gap to fulfil its function.

Policy BNE32: Areas of Outstanding Natural Beauty

*"Development within the Kent Downs Area of Outstanding **Natural Beauty ... will only be permitted when it conserves the natural beauty, wildlife and cultural heritage of the area.***

*Major development will only be permitted in exceptional circumstances and will be considered against the following criteria:- **(iv) Any detrimental impact on the environment or landscape, (v) The environmental standard of the proposed construction or restoration.***

- 3.21 The Kent Downs Area of Outstanding Natural Beauty extends east-west across Kent, however, the River Medway and the urbanised land to the west of the River Medway (which includes Halling and the Site) are excluded from the designated area.

Policy BNE33: Special Landscape Areas

Development within the North Downs ... special landscape areas, ... will only be permitted if:

- i) ***it conserves and enhances the natural beauty of the area's landscape; or***
- ii) ***the economic or social benefits are so important that they outweigh the county priority to conserve the natural beauty of the area's landscape***

a)

Saved Policy BNE34: Areas of Local Landscape Importance

"Within the Areas of Local Landscape Importance defined on the Proposals Map, development will only be permitted if:

- i) it does not materially harm the landscape character and function of the area; or*
- ii) the economic and social benefits are so important that they **outweigh the local priority to conserve the area's landscape.***

*Development within an Area of Local Landscape importance should be sited, designed and landscaped to minimise harm to **the area's landscape character** and function."*

- 3.22 The Site is not within or adjoined by an Area of Local Landscape Importance as identified within the Medway Local Plan 2003. However, one is located at Halling Common approximately 600m to the south and one at Cuxton Brickfields approximately 1.3km to the north-east.

Policy BNE42: Hedgerow Retention

"Important hedgerows will be retained and protected."

Policy BNE43: Trees on Development Sites

"Development should seek to retain trees, woodlands, hedgerows and other landscape features that provide a valuable contribution to local character."

Saved Policy H11: Residential Development in Rural Settlements

"Unless the site is allocated for housing development in the local plan, or an exceptional justification can be made, housing development in the rural area will be restricted to minor development within the confines of the following villages and settlements: ... (viii) Halling ... (xiii) North Halling, (xiv) Upper Halling..."

Emerging Local Plan

- 3.23 Medway Council are currently working on a new Local Plan which will replace the 'saved policies' of the 2003 Medway Local Plan and cover the period up to 2035. Consultation on a Development Strategy technical document is ongoing until 11th May 2018. The Development Strategy technical document sets out the ambitions for the plan and provides options for how the area could grow and draft policies for managing development. The following draft policies are relevant:

Emerging Policy DS2: Spatial Development Strategy

"... The council will consider a lesser scale of development in defined sites in suburban locations around ... the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided".

Emerging Policy NE3: Kent Downs Area of Outstanding Natural Beauty

"Development proposals in the Kent Downs AONB and in the setting of the downs will be required to contribute to the conservation and enhancement of the natural beauty of this designated landscape.

Development must demonstrate that it has have regard to the Kent Downs Management Plan and associated policy guidance."

Emerging Policy N4: Landscape

*"The council attaches great importance to the distinctiveness and quality of landscape in **defining Medway's character**, containing urban sprawl and separation of settlements.*

An updated Medway Landscape Character Assessment and Green Infrastructure Framework will provide a basis for determining the acceptability of development proposals and areas and features that need to be protected and enhanced.

Development proposals will be required to demonstrate that they protect, strengthen and connect features of local landscapes."

Emerging Policy NE6: Green Belt

"The council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.

The council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function."

3.24 The preamble to Emerging Policy NE6 states:

"... Given the scale of growth projected in Medway's population, the council is giving broad consideration to all realistic options at this stage of the plan preparation. This includes testing if the exceptional circumstances exist that would justify a revision to the Green Belt boundary in Medway.

Should the council determine that there are no such exceptional circumstances to support the release of Green Belt land, it will adhere to its policy that development will be restricted in this location, in line with national policy to ensure that the land remains permanently open."

Emerging Policy BE1: Promoting High Quality Design

"Development in Medway will be expected to be of high quality design that makes a positive contribution and respond appropriately to the character and appearance of its surroundings.

Proposals that incorporate high quality design and sustainability which demonstrably consider the following criteria will be permitted: The scale and form of development is appropriate to its surrounding context and is characteristic of Medway, or where appropriate new high quality character; ... How the proposal relates to and/or reinforces the local distinctiveness and character through the use of high quality materials and local vernacular materials where appropriate; landscaping and building detailing; Working with the topography of the site and the incorporation of existing natural features; Responds appropriately to the character of the area, interprets respectfully ... views into and out of the site; ... High quality landscaping ...that make use of or retaining features considered relevant/important; Achieves a transition from urban to rural where appropriate..."

Emerging Policy BE3: Housing Design

"All new accommodation must... Be designed with a clear and particular attitude to place-making and distinctiveness within their context."

Supplementary Planning Documents

Medway Strategic Land Availability Assessment, 2017

- 3.25 Medway's Strategic Land Availability Assessment (SLAA) collates information regarding the availability of potential development sites and forms part of the evidence base for the new Local Plan. The Site is included within the SLAA as development site '0352 - North Field Old Cement Works, Formby Road / Rochester Road, Halling' and is shown on Map 12 of the SLAA.

- 3.26 The SLAA does not allocate development sites nor grant planning permission, but considers if land is 'suitable' for development, 'available' and 'deliverable'. The suitability of the various sites is assessed on a number of criteria, including inter alia: ecological potential, landscape & environment, and residential amenity.
- 3.27 Table 5 of the SLAA lists the Site as being not suitable for development. However, the document does not detail the specific criteria on which the Site was deemed to be unsuitable. The suitability matrix on pages 10-17 states that under the landscape and environment criteria a site would be unsuitable if it **"falls within a landscape of either or both of high sensitivity and good condition in the Medway LCA 2011"**. As detailed within Section 4 below this is not the case for the Site and surrounding landscape, and therefore it is assumed that the Site was deemed unsuitable based on other criteria unrelated to landscape and visual matters.
- 3.28 It should also be noted that the Executive Summary of the SLAA states: **"Whilst the SLAA indicates the Council's initial assessment as to whether a site is free of constraints and likely to come forward for development, it does not allocate development sites or grant planning permission. As such the SLAA does not predetermine the Council's future assessment of sites through the local plan and development management processes"**. The SLAA also goes on to say, **"the assessment and conclusions about sites may be subject to change over time ... constraints may be overcome/mitigated ... and site capacity or densities may change"**.

4.0 SITE CONTEXT

The Site and its location

- 4.1 The Site is located within North Halling in Kent and is adjoined by residential properties on three sides: to the west by properties lining Pilgrims Road / Way; to the south by a recently constructed residential estate known as "St Andrews Park"; and to the north by properties located along the western side of Formby Road / Rochester Road (the A228) and south-eastern side of Pilgrims Road / Way. On its eastern edge the Site is defined by the A228.
- 4.2 The Site is approximately 6.8 hectares (ha) in size and comprises an unmanaged, sloping field. The landform falls consistently from approximately 25m Above Ordnance Datum (AOD) in the west, to approximately 5m AOD in the east. There is a block of woodland in the southern corner, adjoining the A228; a block of woodland in the south-western corner, adjoining Pilgrims Road / Way; dense boundary vegetation along its eastern edge, separating it from the A228; and a linear belt of vegetation along the southern edge of the Site, separating it from St Andrews Park. Pylons and overhead electricity lines extend along the southern boundary of the Site.

Topography and Hydrology

- 4.3 The Site lies at the foot of the western slope of the Lower Medway Valley as illustrated in **Figure 3: Topographical Features Plan**. This is a shallow valley, lying between 0m and 30m AOD, associated with the River Medway. The river flows through the area in a northerly direction from Maidstone in the south to Rochester in the north-east. Beyond Rochester the Medway continues to Sheerness, where it meets the River Thames.

Land Use and Settlement

- 4.4 Land use along the western side of the River Medway, within the vicinity of the Site and Halling, is mixed and includes industrial buildings, marinas, and residential development. Large cement works are a prominent feature near Halling, and a series of pylons and overhead electricity lines are a noticeable feature crossing the valley, including the southern part of the Site. Previous industrial land-use is also evident to the south-west of the Site, where a former chalk pit is now flooded to form a lake (newly-dubbed as 'St Andrews Lakes').
- 4.5 Infrastructure is a dominant land use along the western side of the valley bottom. This includes the A228, the principle road route linking Snodland with Rochester; and the Medway Valley Line railway, which connects Strood with Maidstone. The latter includes two stations within the vicinity of the Site: at Halling to the south and at Cuxton to the north-east. In addition, two bridges span the river: the recently constructed St Peter's Bridge to the south of Halling, and

the Medway Viaduct to the north-east beyond Cuxton. The A228 links a series of settlements along the western side of the valley located between Snodland and Rochester, including (from south to north): Holborough, Halling, North Halling and Cuxton. Later development around these settlements has taken the form of ribbon development along the A228 corridor.

- 4.6 Further west the land rises steeply, with the upper valley sides and ridgeline forming a physical and visual backdrop that is primarily wooded with visible areas of exposed chalk escarpment. The woodland cover in this area is largely defined as Ancient Semi Natural Woodland (ASNW). This land lies within the Kent Downs Area of Outstanding Natural Beauty (AONB), with the Site and the area immediately to south and south-west excluded from the AONB.
- 4.7 Land use on the eastern side of the River Medway is markedly less urbanised. This area comprises primarily agricultural land, with arable land organised into large geometric fields on higher ground and smaller irregular pastoral fields on the river floodplain. Settlement in this area is largely limited to scattered farmsteads, with the only notable settlement at Wouldham on the eastern bank of The Medway River opposite Halling. The agricultural character is heightened by a lack of arterial roads: the landscape here features only minor rural roads, including Wouldham Road and Burnham Road. This land also lies partly within the Kent Downs AONB.
- 4.8 With regards to relevant planning policy and landscape designations, the Site and/or the surroundings are subject to the following:
- The Site is within the Green Belt;
 - The Kent Downs AONB extends east-west across Kent. However, the River Medway and the urbanised land to the west of the River Medway (which includes Halling and the Site) are excluded from the designated area;
 - There are no areas of ASNW within the Site, although much of the woodland that occupies the ridge to the west of the Site is defined as ASNW. This woodland is approximately 100m from the Site at its closest point;
 - The Site is not within or adjoined by an Area of Local Landscape Importance; and
 - There are no listed buildings, Scheduled Monuments or Conservation Areas within the Site or adjoining the Site;
- 4.9 As demonstrated by the above, the Site is located on the lower slopes of the western side of the valley of the River Medway, an area containing a concentration of industrial and urban developments. Whilst the Site is located within the Green Belt, it is surrounded by residential properties on 3 sides (including recent residential development to the south of the Site). With the exception of the Green Belt designation, the Site is not subject to any other planning policy or landscape-related designations.

Published Landscape Character

- 4.10 The landscape character assessment approach is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country. This approach recognises the intrinsic value of all landscapes, not just 'special' landscapes, as contributing factors in people's quality of life, in accordance with the European Landscape Convention. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles.
- 4.11 The description of each landscape is used as a basis for evaluation in order to make judgements to guide, for example, development or landscape management.

National Landscape Character

- 4.12 As part of Natural England's responsibilities in delivering the Natural Environment White Paper, Biodiversity 2020 and the European Landscape Convention, Natural England has developed a series of National Character Area (NCA) profiles. These NCA profiles provide a broad range of information including an outline of the key characteristics of a given area; a description of the ecosystem services provided and how these relate to people, wildlife and the economy; and an array of opportunities for positive environmental change. The extent of NCA profiles is illustrated on **Figure 1: Site Context Plan**.

NCA Profile 119: North Downs

- 4.13 The Site and its immediate surrounding landscape is covered by NCA Profile 119: North Downs, which extends from Guildford to Dover. The key characteristics of NCA Profile 119 of relevance to the Site and surrounding area, are as follows:
- ***"...A distinctive chalk downland ridge rises up from the surrounding land, with a steep scarp slope to the south providing extensive views across Kent, Surrey and Sussex and across the Channel seascape to France;***
 - ***Chalk soils are predominant across the NCA but the upper part of the dip slope is capped by extensive clay-with-flint deposits...;***
 - ***The area is cut by the deep valleys of the Stour, Medway, Darent, Wey and Mole. The river valleys cut through the chalk ridge, providing distinctive local landscapes which contrast with the steep scarp slope;***
 - ***The footslope of the escarpment supports arable cropping, the dominant land use within the NCA. In the east, the richer, loamy soils of the lower dip slope support large tracts of mixed arable and horticultural production;***
 - ***Woodland is found primarily on the steeper slopes of the scarp, valley sides and areas of the dip slope capped with clay-with-flints. Well-wooded hedgerows and shaws are an important component of the field boundaries, contributing***

strongly to a wooded character. Much of the woodland is ancient;

- *Ancient paths, drove roads and trackways, often sunken, cross the landscape and are a distinctive feature of the dip slope. Defensive structures such as castles, hill forts and Second World War installations, and historic parks, buildings and monuments are found throughout; and*
- *Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern with local flint, chalk and Wealden brick the vernacular materials..."*

4.14 With respect to NCA 119: North Downs, the following Statements of Environmental Opportunity of relevance to the Site are provided:

- *"SEO 1: Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations;*
- *SEO 2: Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs recognising their contribution to sense of place, sense of history and tranquillity...; and*
- *SEO 4: Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness..."*

4.15 Key Landscape Opportunities within NCA Profile 119 identified on page 54 include:

- *"Protect, conserve and enhance the character of much of the downland landscape devoid of development and urban intrusions, retaining and expanding the remaining areas of tranquillity...;*
- *Manage, conserve, enhance and restore the characteristic pattern of thick well-treed hedgerows and shaws, forming a predominantly irregular field pattern...*
- *...tackle the challenges associated with urban fringe pressures on the North Downs...learning from landscape scale projects which have successfully driven forward improvements in the urban fringe environment and strengthened local landscape character..."*

County Landscape Character

4.16 The Landscape Assessment of Kent was prepared by Jacobs Babbie on behalf of Kent County Council and was published in October 2004. The Landscape Assessment of Kent identifies a number of different Landscape Character Areas (LCAs) across Kent, and provides a description of and vision for each LCA.

4.17 The Site lies within the Kent Downs – Medway, Western and Eastern Scarp LCA, which is characterised by:

- ***"Gently undulating arable farmland;***
- ***Sparse, remnant hedges leading up to wooded ridges;***
- ***Open and wild character on eastern slopes with wide views;***
and
- ***Quarries."***

4.18 The LCA is described as a generally incoherent landscape of very poor condition in which features do not reflect or enhance the landform. It is also noted that there are many visual detractors, including quarry faces and ridge-line housing. Built development is described as being ***"...frequent in views and of having a high negative impact"***.

4.19 The Medway Valley is described as having ***"a significant landform as a whole"***, however, the lower slopes of the western and eastern scarp are described as ***"unremarkable when considered in isolation"***. The LCA describes the landscape as ***"open with moderate visibility"***, and states that hedged field boundaries and woodland are limited. With regard to the sensitivity of the landscape, the LCA describes this as low.

4.20 The Landscape Actions described within the LCA include: the creation of enclosure for urban areas using characteristic woodland; the creation of a landscape framework to provide an urban edge and peripheral enclosure to arable fields and other farmland; and the creation of shaws or wide hedgerows as enclosure and to provide a network of semi-natural habitats. In relation to open areas, the LCA highlights the importance of maintaining space between urban development and the waterfront of the river.

Local Landscape Character

4.21 The Medway Borough Council's Landscape Character Assessment was prepared in 2011. The Site and the surrounding landscape in the vicinity falls within Landscape Character Area 39: Halling Quarries. The Landscape Type of this LCA is identified as Rural Fringe, and of sub-type Rural fringe with urban/industrial influences. The key characteristics of LCA 39: Halling Quarries are identified as follows:

- ***"Scarp floor with rolling arable fields, interspersed with small settlements, disused quarries, industrial heritage and Peter's Pit development infrastructure works;***
- ***Heavily wooded disused pits fragment character but screen visual interruption;***
- ***Blue Lake to south west of Halling Cement Works forms distinctive landscape feature; overhead pylons and cement works are detracting features; and***
- ***Southern part of character area extends into Tonbridge and Malling"***

- 4.22 The LCA is described as being of moderate condition, with a variable pattern of elements, having some detracting features and an interrupted visual unity. The LCA is described as having a moderate sensitivity.
- 4.23 'Issues' identified on page 105 include the new development proposals for the Halling Cement Works and infrastructure works associated with Peter's Pit development (south of the Site), and loss of rural character from new developments and urban fringe intrusions/activities.
- 4.24 'Guidance' includes: ensuring the use of appropriate native planting to screen new development from footpaths, roads, existing settlements and rural areas; and ensuring that new development proposals respect the rural character of the area and criteria associated with Green Belt designation.
- 4.25 Since the LCA was published the St Andrews Park housing development has been constructed within LCA 39 immediately to the south of the Site, which represents a change to the character area. This residential development is therefore not reflected within LCA 39 character description, although the 'General Notes' section of the LCA does reflect that the removal of cement works and new development on the site will alter the character of the area from predominantly industrial to residential.

Contribution of the Site to Landscape Character

- 4.26 The Site is generally reflective of the wider landscape character of the Lower Medway Valley, being rural-fringe in character and influenced by urban/industrial development nearby, including residential development immediately adjacent on three sides and electricity pylons crossing the Site's southern edge. The woodland to the south and south-west of the Site, and the boundary vegetation along the southern and eastern edges, are elements that are generally characteristic of the more well-wooded areas of the escarpment to the west, and these should be retained and enhanced as part of any development of the Site in accordance with the published guidelines.

5.0 LANDSCAPE AND VISUAL APPRAISAL

Overview

- 5.1 The Site and the surrounding environment was visited in April 2018, with **Site Appraisal Photographs A - C** illustrating the existing character of the Site. The locations from which the Site Appraisal Photographs were taken are shown on **Figure 2: Aerial Plan of Site**. The visual context of the Site is illustrated by **Site Context Photographs 1 - 11**, the locations of which are illustrated on **Figure 1: Site Context Plan**.

Landscape Appraisal

- 5.2 A landscape appraisal has been undertaken to ascertain the existing character of the Site. This is accomplished through recording and analysing the existing landscape features and characteristics, the way the landscape is experienced, and the value or importance of the landscape and visual resources in the vicinity of the Site. The elements of the landscape that contribute to landscape character include the built and natural form, the pattern of features, detailing, scale, planting, land use and human perception. In this regard, landscape character is derived as a result of the perception of, and action and interaction of, natural and human factors.
- 5.3 As illustrated in **Site Appraisal Photograph B** and **Site Appraisal Photograph C** the Site is comprised of an unmanaged field sloping west to east (from approximately 25m AOD to approximately 5m AOD). The Site is adjoined by residential properties on three sides (to the north, west and south), which is generally apparent from within the Site. The Site is clearly defined by the A228 to the east, beyond which lies the Medway Valley Line railway. These busy communication routes are generally perceptible from within the Site, being intervisible from the higher ground in the west.
- 5.4 Woodland blocks lie in the southern and south-western corners of the Site; a dense hedgerow extends along the Site's western edge; and a linear belt of trees lines its southern boundary. **Site Appraisal Photograph A** shows the well-wooded setting of the Site to the south-west, and the resulting sense of enclosure here. However, despite this there is some intervisibility with the housing development at St Andrews Park to the south. From much of the Site the surrounding vegetation restricts intervisibility with the landscape to the south and south-east. However, industrial development (cement works) to the south-east at Halling, and a series of electricity pylons along the southern edge of the Site remain perceptible above the vegetation in places (as shown in **Site Appraisal Photographs B and C**). These features are prominent infrastructural elements that, along with other surrounding urban/industrial and communications land-uses, have an urbanising influence.

5.5 The Site is considered to be of low landscape value due to the following:

- It is comprised largely of an unmanaged field in relatively poor condition, albeit with some woodland blocks that are generally in a good state of repair and should be retained and enhanced as part of any proposed development in accordance with the published guidelines (see Published Landscape Character above);
- The Site is generally not of noteworthy scenic quality, insofar as it largely comprises a commonplace element - an unmanaged field - adjoined by residential development and a busy A road. The presence of built development and infrastructural elements detracts from the scenic and perceptual qualities of the Site and has an urbanising influence;
- The Site is not particularly remote or tranquil, given its proximity to built developments and the busy road and rail routes immediately to the east;
- The Site does not form part of the historic landscape setting of any heritage assets; and
- Other than PRow RS220 extending along its northern boundary, the Site currently affords no opportunity for public recreation.

Visual Appraisal

5.6 A visual appraisal has been undertaken to determine the relationship of the Site with its surroundings and its approximate extent of visibility within the wider landscape from publicly accessible locations.

5.7 The potential visibility of the Site is largely determined by the intervening landform, as topographic features such as ridgelines and subtle undulations may block or curtail views towards the Site. In addition, land cover has an important role in determining potential visibility; woodland, tree belts or built forms may contribute to additional blocking, filtering or curtailing of views.

5.8 The effectiveness of vegetation as a visual screen depends to a considerable extent on its scale. A large mature feature will form a substantial screen throughout the year, but a hedgerow or intermittent tree belt may only be effective during the summer months when vegetation is in leaf. Whilst small features, such as hedgerows and individual trees can be very important, particularly when their combined effect is taken into account, they cannot be considered to be substantial or wholly effective screening features or visual barriers due to the seasonal nature of their effect.

5.9 **Site Context Photographs 1 – 11** demonstrate that views of the interior of the Site are generally limited to locations in proximity to the Site. From the residential properties immediately adjacent to the Site views are available, although partially filtered by intervening scrub vegetation on the edge of the Site and/or vegetation within gardens. As illustrated in

Site Context Photograph 2 open views are also obtainable from certain points along PRoW RS220, although from other areas views are partially curtailed by vegetation lining the footpath. From other locations in proximity to the Site, views are heavily curtailed by the vegetation and built forms surrounding the Site. The vegetation is mainly mature or semi-mature and provides a robust visual screen, as is evident within **Site Context Photographs 1, 3, and 4**.

- 5.10 Moving away from the Site, views become further restricted by intervening landform and/or land cover. The ridge of higher ground to the west provides a degree of physical and visual containment. Views from the ridge, including from within the Kent Downs AONB, are generally screened by the dense woodland covering. However, more open views are available from the less wooded valley sides as illustrated in **Site Context Photograph 5**. From PRoW RS201 open elevated views are available west across the river and valley bottom. The residential development at St Andrews Park to the south of the Site is visible, beyond which is the River Medway and adjacent industrial land uses. Partial views of the Site are available from this location, with only the woodland and boundary vegetation to the south and south-west of the Site visible. This vegetation visually coalesces with other vegetation in the view meaning the Site's interior is not visible.
- 5.11 From locations to the north and south along the lower valley floor, views generally become curtailed by intervening built forms and vegetation, as demonstrated in **Site Context Photograph 6 and 11**.
- 5.12 Clearer views towards the Site are obtainable from the east, on the opposite side of the River Medway, including from areas within the Kent Downs AONB. Views are available from the lower ground on the eastern side of the river including from PRoW MR1, which follows the opposite bank of the river (as illustrated in **Site Context Photograph 7**); and from Wouldham Road to the south-east (as illustrated in **Site Context Photograph 5**). From these locations the interior of the Site is partially visible although views are filtered through the dense boundary vegetation along the Site's eastern edge in proximity to the A228.
- 5.13 More distant elevated views are also available from the areas of higher ground further to the east, as illustrated in **Site Context Photographs 9 and 10**. From these locations the interior of the Site is partially visible, although again views are filtered through the intervening vegetation along the eastern side of the Site in proximity to the A228.
- 5.14 In views from the east, existing built development is prominent along the lower slopes of the Medway Valley, beyond which the wooded escarpment rises to form a backdrop to the view. The Site is visible from these locations, although seen in context with existing residential development to the west (visible above the Site), north and to the south. Industrial

development at Halling is also readily apparent in views from the east, and the A228 and Medway Valley Line are intermittently visible. The Medway Viaduct to the north is also visible in the distance. This built development adds an urbanised character to the views.

Summary

- 5.15 Overall the Site is considered to be of low sensitivity as it is of low landscape value and it has a very localised visual envelope to the north, west and south due to the surrounding landform and landcover (vegetation and built form). Whilst the visual envelope to the east is more extended, the Site interior is only partially visible from certain locations, and where visible it is seen in conjunction with the adjacent existing residential and industrial development. The visual character is one of a semi-developed, urbanised landscape.
- 5.16 In most views it is only the vegetation within the Site that is apparent, and this tends to visually coalesce with other vegetation along the valley sides and in the escarpment above. The vegetation within the Site, including the dense boundary vegetation along its eastern edge, filters views to the interior and thus offers a degree of physical and visual enclosure.

6.0 OPPORTUNITIES AND CONSTRAINTS TO DEVELOPMENT

- 6.1 The Site is considered to provide the opportunity for residential development from a landscape and visual perspective due to: the proximity to and influence of the existing built forms to the north, west and south; the extent of enclosure provided by the existing vegetation framework bordering the Site; and that the existing settlement pattern already extends along the majority of the lower valley side within which the Site lies.
- 6.2 Nonetheless, any development within the Site will need to ensure that the boundary vegetation is retained and enhanced, so as to sensitively and sympathetically integrate the development into its surroundings.

Site Opportunities and Constraints

Opportunities

- 6.3 Opportunities for development within the Site are that:
- The Site is not covered by any landscape designations;
 - There is an existing vegetation framework bordering and enclosing the Site, which offers a degree of physical and visual enclosure and results in a very localised visual envelope;
 - The Site does not exhibit any rare landscape features; and
 - The Site is not publicly accessible and, other than PRow RS220 extending along its northern boundary, affords no opportunity for public recreation.

Constraints

- Development should be offset from the existing woodland within the Site and the boundary vegetation structure to respect the extent of Root Protection Areas (the extent of which should be determined by an arboricultural survey); and
- Development on the higher ground in the western part of the Site may be apparent in views from the east, and accordingly it is recommended that development proposals incorporate a robust landscape framework to aid in screening and softening these views, with the potential to incorporate advanced planting.

Response to Landscape Character

- 6.4 The development proposals could respond positively to the environmental and landscape opportunities identified for the North Downs NCA Profile through the protection and enhancement of a diverse range of woodlands and trees, including the vegetation within and bordering the Site.

- 6.5 In relation to the Kent Downs – Medway, Western and Eastern Scarp LCA, the development proposals could help create a landscape framework to provide enclosure for urban areas, using characteristic woodland to help provide a network of semi-natural habitats. Also, in relation to LCA 39: Halling Quarries, development proposals could introduce appropriate native planting to screen the new development from footpaths, roads, existing settlements and rural areas.

Response to Planning Policy

- 6.6 The development proposals within the Site could respond positively to the identified policies within the NPPF and the saved policies from the Medway Local Plan 2003, in addition to the emerging policies set out within the Development Strategy technical document. As part of the development proposals, the existing vegetation both within and enclosing the Site could be retained and enhanced, and could be supplemented through the provision of additional areas of planting (utilising locally distinctive species). This could help create green infrastructure linkages through the Site, while breaking up and softening the overall perceived scale, mass and extent of introduced built forms. The siting, density, layout and materials of introduced built forms could also make a positive contribution and respond appropriately to the character and appearance of the surrounding landscape.

Design Strategy

- 6.7 A series of design considerations have been identified as a result of the landscape and visual appraisal and include:
- Existing vegetation structure should be retained, reinforced and enhanced. Implement effective landscape management to ensure thinning, selective felling and replanting to achieve a varied age structure;
 - Provide new areas of planting, including shaws or wide hedgerows, with appropriate locally distinctive species, to soften and break up the perceived mass of the introduced built forms in views. Tree planting should be incorporated along the Site contours throughout the development proposals, including along roads and within public open spaces, to help soften the appearance of the built form within the Site in views from across the River Medway valley;
 - Ensure that the introduced built forms are designed to contribute positively to the sense of place and local distinctiveness and respond appropriately to the character and appearance of its surroundings;
 - Ensure that any built forms are offset in relation to the root protection areas of existing vegetation to be retained within and bordering the Site.
 - The amenity value of PRow RS220 along the northern edge of the Site should be enhanced, as currently it is a narrow corridor route, separated from the Site by scrub

and scattered trees. Pockets of open space and more open views into the Site and the River Medway to the east should be introduced, with the potential for play areas incorporated within a parkland setting along this route; and

- The wider pedestrian connectivity locally should be enhanced, by introducing pedestrian connections between Pilgrims Road / Way to the west of the Site and PRow RS220 to the north of the Site, through the Site.

7.0 GREEN BELT REVIEW

7.1 An assessment of the contribution of the Site to the first four purposes of the Green Belt, as set out in Paragraph 80 of the NPPF, has been undertaken in Table 7.1 below.

Table 7.1: Contribution of the Site to the Purposes of the Green Belt

Purpose	Critique	Contribution
Check the unrestricted sprawl of large built-up areas	As the Site is currently comprised of an open field the introduction of built development would undoubtedly result in a physical extension of the settlement pattern. However, given the presence of existing residential development adjoining the Site to the north, west and south and the A228 to the east, built development within the Site would be generally in keeping with the character of the immediate surrounding landscape. This would be perceived as a coherent extension to the existing settlement pattern, rather than unmanaged sprawl. In addition, the Site is contained by robust physical features - dense boundary vegetation and woodlands - which would serve to visually contain built forms and thus further diminish any potential perceived sense of sprawl.	Limited
Prevent neighbouring towns from merging	Whilst the introduction of built development to the Site would result in a degree of physical infill, there would only be a limited perceived reduction in separation between adjacent areas of settlement. This is due to the Site being physically contained by existing built development, as well as the urbanised character of the surrounding valley floor landscape, in which there is little existing clear distinction between settlements. The existing residential properties on Pilgrims Road / Way are perceived as defining the western extent of the Site despite being 'washed over' by the Green Belt designation. Given the above, the development of the Site would result in only a limited reduction in the physical separation between areas of settlement, while perceptibly there would be no reduction.	Limited
Assist in safeguarding the countryside from encroachment	There are currently no built or engineered forms located within the Site, although electricity pylons cross along its southern extent. However, built development adjoining the Site and defining it to the north, west and south, mean there is minimal perception of it being undeveloped. The surrounding landscape contains industrial features and a busy communications corridor that in conjunction have an urbanising influence over the Site. In addition, vegetation surrounding the Site offers a degree of physical and visual containment, meaning views into the Site are generally filtered. Development within the Site would result in a limited urbanising influence.	Limited
Preserve the setting and special character of historic towns	The Site does not have a physical, visual or character connection with the historic part of any town.	None

7.2 The NPPF states that the key characteristics of the Green Belt are "***their openness and their permanence***". As demonstrated in Table 7.1, the Site is considered to be inherently open due to it comprising an open field with areas of scrub and woodland. However, it is pertinent that the Site is physically adjoined on three sides by built development, albeit the existing

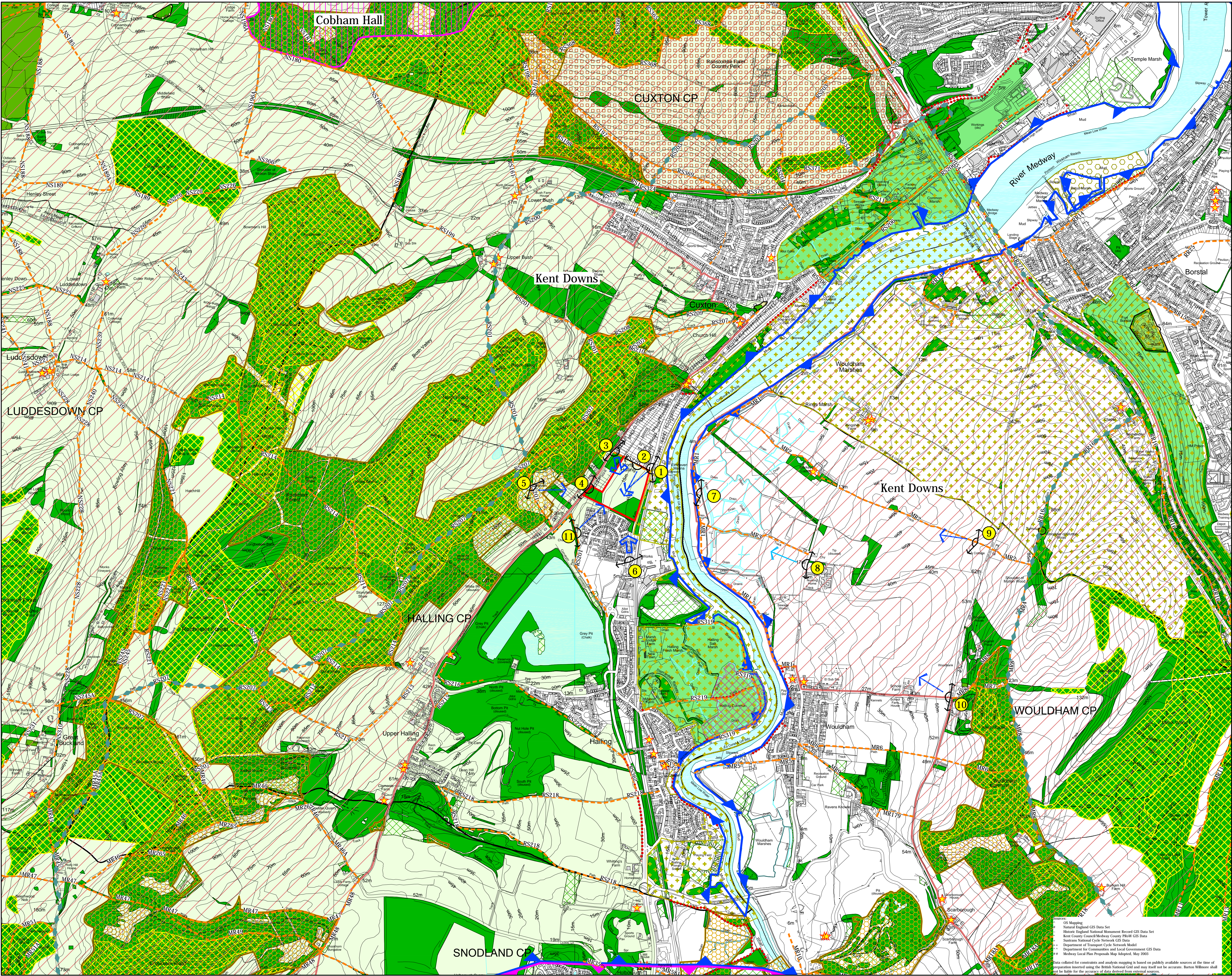
development on Pilgrims Road / Way falling within the Green Belt designation (i.e. 'washed over' by the designated area). Despite the physical reduction in openness that would occur should the Site be developed, the perceived reduction would be limited. Any development would appear as a coherent extension to the existing settlement pattern and would be in keeping with the urbanised character of the surrounding valley floor landscape. Moreover, the Site is contained by dense boundary vegetation and woodlands, which would serve to visually contain introduced built forms and thus further diminish any potential perceived sense of sprawl.

- 7.3 Built development on Pilgrims Road / Way to the west of the Site is 'washed over' by the Green Belt designation. Consequently, while there is a small parcel of land that is defined as Green Belt between North Halling and St Andrews Park, this land is not perceived to separate these two areas given the presence of the adjoining built development to the west that effectively connects these respective areas together.
- 7.4 Given the above, the release of the Site from the Green Belt offers the potential to consolidate the settlement pattern and redefine the boundary of the Green Belt (and western extent of the defined settlement boundary) to a feature that is actually perceived as the settlement edge, i.e. built development along Pilgrims Road / Way, as opposed to a short section of the A228.
- 7.5 The land beyond Pilgrims Road / Way to the west is formed of the steeply rising escarpment that contains numerous areas of woodland, including ASNW. This would form a robust and defensible boundary that is likely to be of permanence. This would be a more appropriate boundary and one which aligns with how the extent of the developed area is perceived.
- 7.6 Moreover, it is crucial to note that as set out in Paragraph 85 of the NPPF, when defining Green Belt boundaries local planning authorities should **"not include land which it is unnecessary to keep permanently open"** and **"define boundaries clearly, using physical features that are readily recognisable and likely to be permanent"**. The release of the Site and the immediately adjoining built form that lies east of Pilgrims Way / Road from the Green Belt will satisfy the policy requirements of the NPPF.
- 7.7 Should the Site be released from the Green Belt and subsequently be developed as per the principles set out in Section 6 of this report, the openness of the remaining designated area would remain intact given the generally limited visual envelope of the Site and that it is already perceived to be physically contained by existing built development. On this basis, development of the Site would not compromise the purposes and function of the remaining Green Belt and accordingly should be released from the Green Belt.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 The Site is located within an urbanised landscape situated on the lower slopes of the western side of the valley of the River Medway. Whilst the Site is within the Green Belt, it is surrounded by residential properties on three sides, including recent residential development to the south of the Site. The A228 and Pilgrims Road / Way provide connectivity to the residential settlements and various land uses along the valley. Beyond this to the west, the rising escarpment forms a physical and visual backdrop that is primarily wooded with some areas of exposed chalk scarps.
- 8.2 With the exception of being within the Green Belt, the Site is not subject to any planning policy or landscape-related designations.
- 8.3 The Site is approximately 6.8 hectares in area and comprises an unmanaged, sloping field which falls from approximately 25m AOD in the west to 5m AOD in the east. There are blocks of woodland in the south-eastern corner adjoining the A228 and the south-westernmost corner adjoining Pilgrims Road / Way. The Site is defined on its southern and eastern edges by dense belts of boundary vegetation. Electricity pylons extend along the southern boundary of the Site, beyond which is the recently constructed St Andrews Park residential development.
- 8.4 The published landscape character assessments describe a predominantly chalk landscape, cut by deep valleys including the Medway Valley, where the upper slopes are typically well wooded. More locally, the Medway Valley is described as an incoherent landscape with wide, open views, and of poor condition. Guidelines include the creation of a strong landscape framework to provide a network of semi-natural habitats, and screening development with appropriate native planting from footpaths, roads, existing settlements and rural areas. The published assessments broadly reflect the local landscape character of the western edge of the River Medway, which is incoherent and of low sensitivity.
- 8.5 The Site is generally reflective of the wider landscape character of the Lower Medway Valley, being rural-fringe in character and influenced by urban/industrial development nearby. Overall the Site is considered to be of low sensitivity, as it is of low landscape value and it has a very localised visual envelope to the north, west and south due to the surrounding landform and landcover (vegetation and built form). Whilst the visual envelope to the east is more extended, the Site interior is only partially visible and where visible it is seen in conjunction with surrounding residential and industrial development. The visual character is influenced by the presence of urbanising and industrial elements in the context of the Site. In most views the vegetation surrounding the Site, including the dense boundary vegetation along its eastern edge, filters views to the interior and thus offers a degree of physical and visual enclosure.

- 8.6 The Site is considered to be inherently open due to it comprising an open field with areas of scrub and woodland. However, it is pertinent that the Site is physically adjoined on three sides by built development, with the existing development on Pilgrims Road / Way falling within the Green Belt designation (i.e. 'washed over' by the designated area). Despite the physical reduction in openness that would occur should the Site be developed, the perceived reduction would be limited. Any development will appear as a coherent extension to the existing settlement pattern and would be in keeping with the urbanised nature of the surrounding valley floor landscape. Moreover, the Site is contained by dense boundary vegetation and woodlands, which would serve to visually contain built forms and thus further diminish any potential perceived sense of sprawl.
- 8.7 The release of the Site from the Green Belt offers the potential to consolidate the settlement pattern and redefine the boundary of the Green Belt to a more appropriate boundary feature that is already perceived as the settlement edge (i.e. the built development along Pilgrims Road / Way). The land beyond Pilgrims Road / Way to the west is formed of well-wooded (including ASNW), steeply rising escarpment that would form a robust and defensible boundary likely to be of permanence.
- 8.8 As a result of the above considerations, it is concluded that sympathetic development within the Site would be acceptable in landscape and visual terms and would not compromise the purposes and function of the wider Green Belt. On this basis, the Site is considered appropriate for release from the Green Belt and should be allocated for residential development.



Revision

Date

Drm

Ckd

Legend

Site Boundary

Existing Woodlands, Copses and Tree Belts ^

Existing Water Courses and Features ^

Contours/Spot Heights (Metres AOD) ^

Public Rights of Way *

National Trails / Long Distance Walks #

Listed Buildings ~

Scheduled Monument ~

Registered Parks and Gardens ~
- Cobham Hall

Ancient Woodland #

Area of Outstanding Natural Beauty #
- Kent Downs

Green Belt ^^

Countryside Rights of Way Access Areas #

Sites of Special Scientific Interest #

Country Park #

Area of Local Landscape Importance
(Saved Policy BNE 34) ##

Strategic Gap
(Saved Policy BNE 31) ##

National Character Area (NCA) Profiles #

NCA 119: North Downs
(The Site is within this NCA)

NCA 120: Wealden Greensand

Visual Appraisal

Location of Photographic Viewpoints
(Site Context Photographs: 1-10)

Open views of the Site

Filtered views of the Site

No Views of the Site

FIGURE 1

Project
North Field,
Halling, Kent
Drawing Title
Site Context Plan

Date	Scale	Drawn by	Check by
27.04.2018	1:10,000 @A1	GS	DH
Project No	1:5,000 @A3		
23486	L1		

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OS Mapping
Natural England GIS Data Set
Historic England National Monument Record GIS Data Set
Kent County Council/Wealden County Planning GIS Data
Sustrans National Cycle Network GIS Data
Department of Transport Cycle Network Model
Department for Communities and Local Government GIS Data
Medway Local Plan Proposals Map Adopted, May 2003

Data collected for constraints and analysis mapping is based on publicly available sources at the time of preparation. Insetted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

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J:\23000-23999\23400-23499\23486 - North Field, Halling\A4 - Design & Register\Landscape\23486 L1 Site Context Plan.dwg - A1



The scaling of this drawing cannot be assured

Revision

Date

Drn

Ckd

LEGEND

Site Boundary

Existing Water Courses and Features ^

Contours/Spot Heights (Metres AOD) ^

Public Rights of Way *

Location of Photographic Viewpoints (Site Appraisal Photographs: A-C)

Sources:

^

OS Mapping

*

Medway Council PRow GIS Data

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

FIGURE 2

Project
North Field,
Halling, Kent
Drawing Title
Aerial Plan of Site

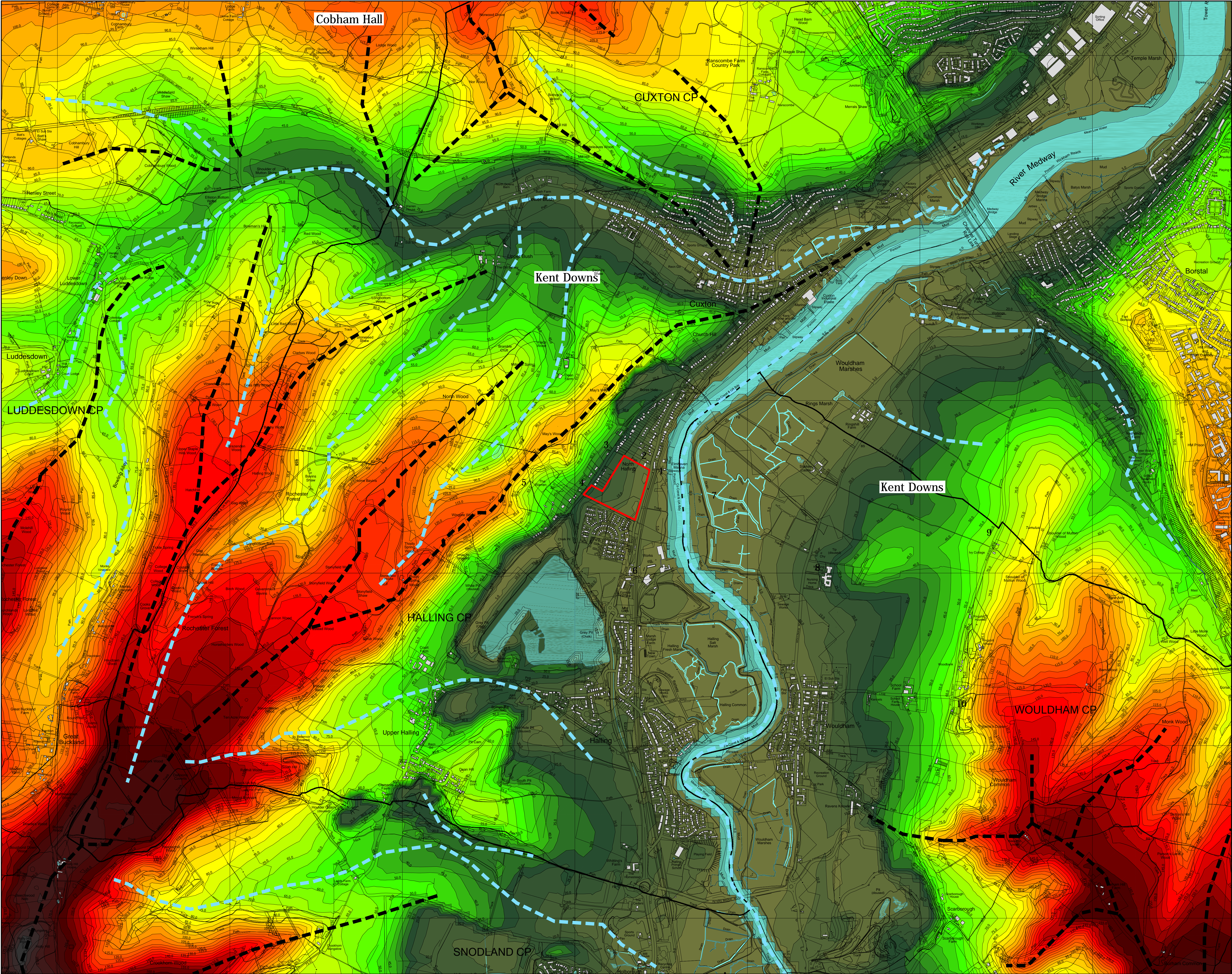
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26.04.2018	1:2,000 @A3	GS	DH
Project No	Drawing No	Revision	
23486	L2	-	

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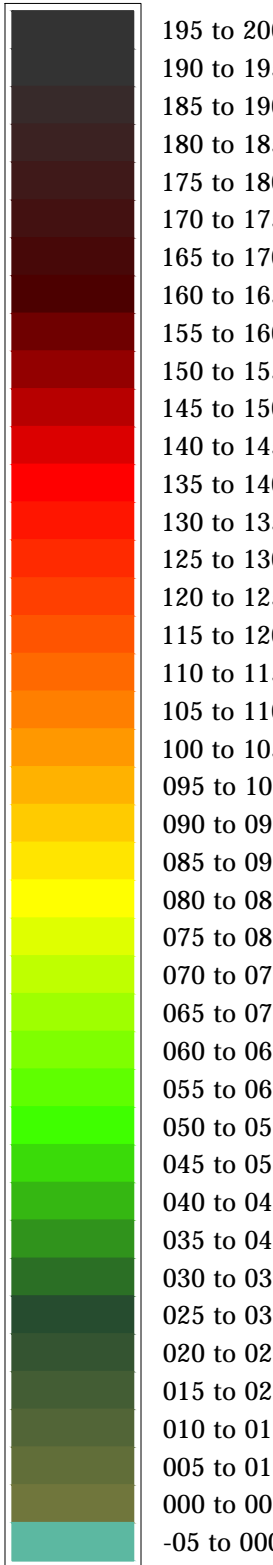


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Revision Date Dm Ckd

Legend

- Site Boundary
- Existing Water Courses and Features
- Contours/Spot Heights (Metres AOD)
- Ridgelines
- Valleys

Elevation (Metres AOD)



Sources:
OS Mapping
Data collected for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

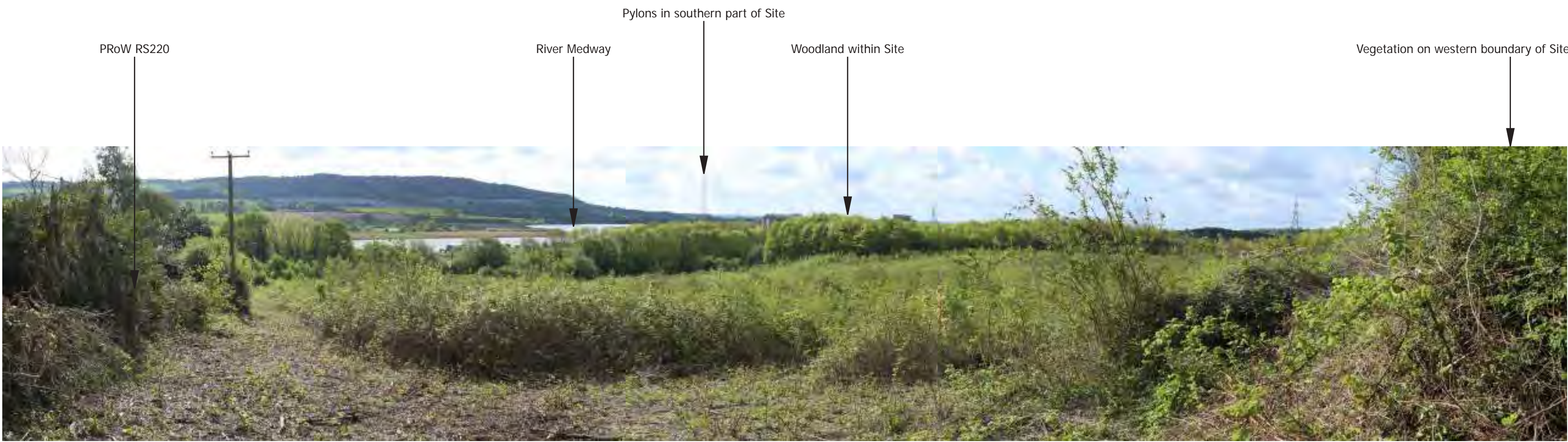
FIGURE 3

Project
North Field,
Halling
Drawing Title
Topographical Features Plan

Date 25.04.2018	Scale 1:10,000 @A1 1:20,000 @A3	Drawn by GS	Check by DH
Project No 23486	Drawing No L3		Revision -



SITE APPRAISAL PHOTOGRAPH A : VIEW FROM SOUTH-WEST CORNER OF SITE, LOOKING EAST'



SITE APPRAISAL PHOTOGRAPH B : VIEW FROM NORTH-WESTERN EDGE OF SITE, LOOKING SOUTH



SITE APPRAISAL PHOTOGRAPH C : VIEW FROM THE NORTHERN BOUNDARY OF THE SITE, LOOKING SOUTH-WEST



SITE CONTEXT PHOTOGRAPH 1: VIEW FROM ROCHESTER ROAD/ FORMBY ROAD (A228), LOOKING WEST
Distance: 19m



SITE CONTEXT PHOTOGRAPH 2: VIEW FROM PROW RS220, LOOKING SOUTH-WEST
Distance: 2m



SITE CONTEXT PHOTOGRAPH 3: VIEW FROM PILGRIMS ROAD / WAY, LOOKING SOUTH-EAST
Distance: 71m

**NORTH FIELD,
HALLING, KENT**

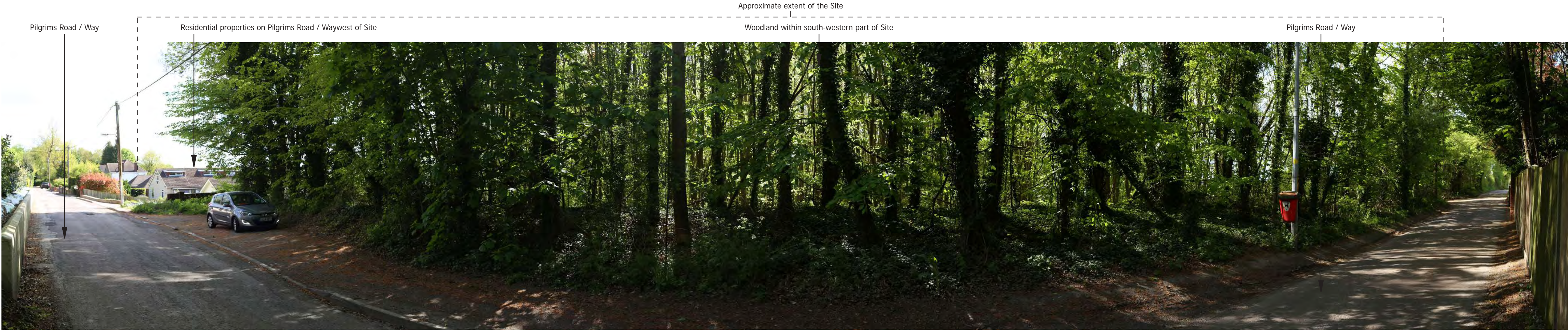
**SITE CONTEXT
PHOTOGRAPHS: 1 - 3**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

DATE TAKEN: APR 2018

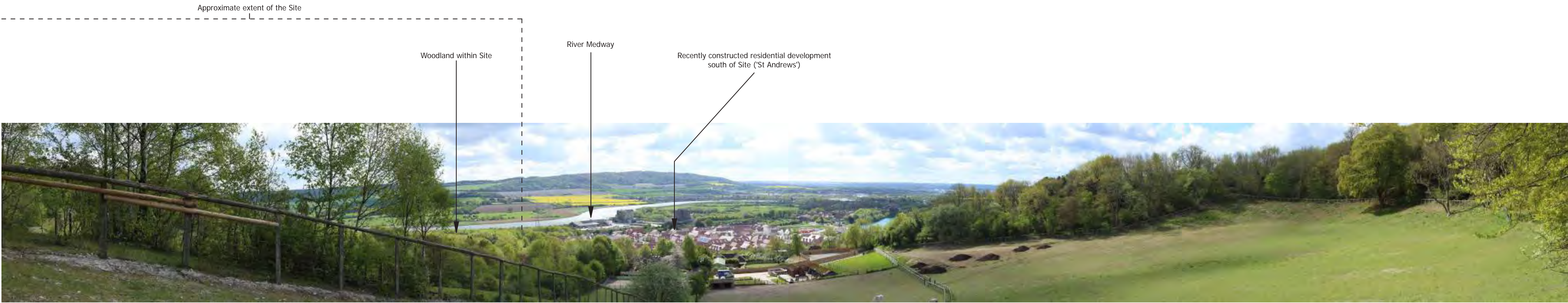
PROJECT NUMBER: 23486

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SITE CONTEXT PHOTOGRAPH 4: VIEW FROM PILGRIMS ROAD / WAY, LOOKING EAST

Distance: 5m



SITE CONTEXT PHOTOGRAPH 5: VIEW FROM PROW RS201, LOOKING EAST

Distance: 310m



SITE CONTEXT PHOTOGRAPH 6: VIEW FROM FORMBY ROAD / ROCHESTER ROAD (A228), LOOKING NORTH

Distance: 240m

**NORTH FIELD,
HALLING, KENT**

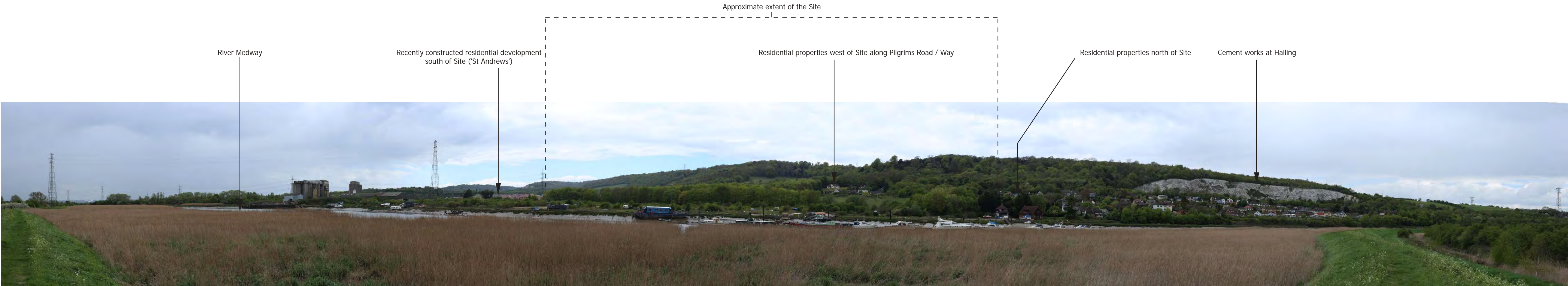
**SITE CONTEXT
PHOTOGRAPHS: 4 - 6**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

DATE TAKEN: APR 2018

PROJECT NUMBER: 23486

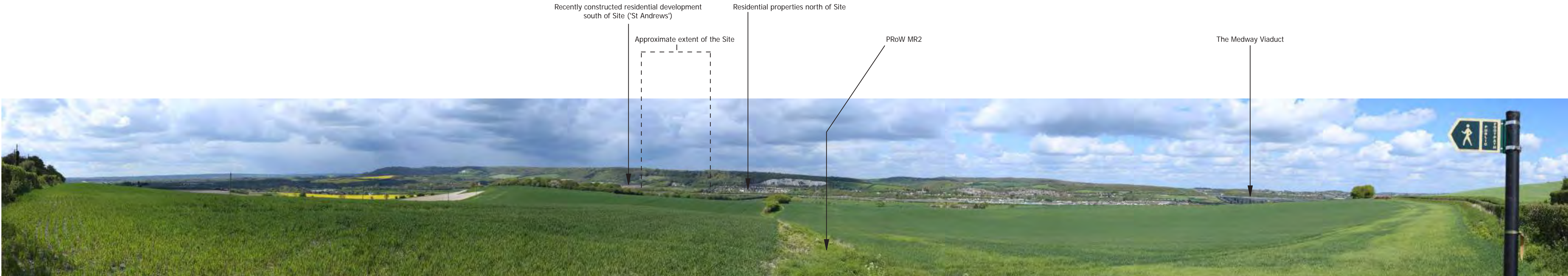
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SITE CONTEXT PHOTOGRAPH 7: VIEW FROM AONB (KENTS DOWNS), LOOKING WEST
Distance: 327m



SITE CONTEXT PHOTOGRAPH 8: VIEW FROM WOULDHAM ROAD, LOOKING NORTH-WEST
Distance: 1.03km



SITE CONTEXT PHOTOGRAPH 9: VIEW FROM PROW/MR2, LOOKING WEST
Distance: 1.95km

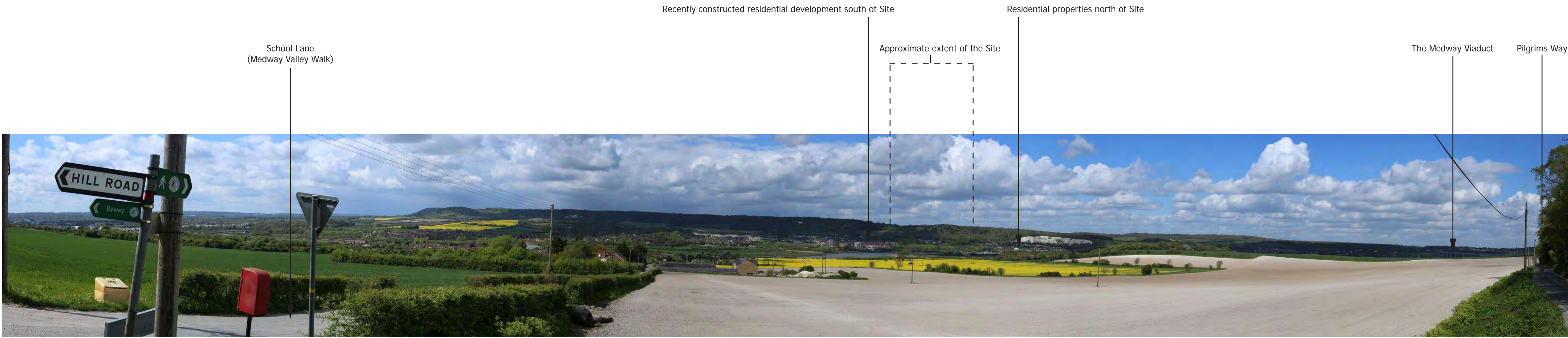
**NORTH FIELD,
HALLING, KENT**

**SITE CONTEXT
PHOTOGRAPHS: 7 - 9**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

DATE TAKEN: APR 2018

PROJECT NUMBER: 23486



SITE CONTEXT PHOTOGRAPH 10: VIEW FROM PILGRIMS WAY, LOOKING NORTH-WEST

Distance: 2.1km



SITE CONTEXT PHOTOGRAPH 11: VIEW FROM PROW/RS201, LOOKING NORTH-EAST

Distance: 216m

**NORTH FIELD,
HALLING, KENT**

**SITE CONTEXT
PHOTOGRAPHS: 10 - 11**

**RECOMMENDED VIEWING
DISTANCE: 20CM @A1**

DATE TAKEN: APR 2018

PROJECT NUMBER: 23486

**BARTON
WILLMORE**

Joint Peninsula response to Local Plan consultation

18/06/2018

To: Medway Planning Service

Dear Sir/Madam

We, the undersigned, respectfully put forward our comments in relation to the latest phase of the Medway Local Plan consultation process. Each party has/will be submitting their individual consultation response, however, to strengthen our voice on the impact that the Local Plan is likely to have on the Peninsula, we have decided to submit a collective response which includes our objections with and suggestions for Medway's Local Plan.

This response has been broken down into three key areas: housebuilding, environment and infrastructure.

1. Housebuilding

The main concern for all parties is the proposed scale of development planned for the Peninsula in all four scenarios of the the Development Strategy document. There still remains a lack of clarity as to how many houses will be built – the Member of Parliament and many Parish Councils have still not received clarification of the breakdown of housing numbers for each village that the Council used to come to their proposed totals.

Most parties accept that more houses are needed as the population of Medway continues to grow and the area becomes more attractive to commuters; however, new housing should be reserved for local people and every community in Medway must take its share of housebuilding. As mentioned in the point above, the Peninsula is set to become seriously overdeveloped with the current plan and we are at great risk of losing the character and uniqueness which the Peninsula now enjoys. The distribution of houses should be more proportionate and shared throughout the whole Medway region.

As well as building homes for local people, the new housing must be affordable and suitable to Medway residents. With an ageing population, there needs to be better provision for single-storey supported living facilities or bungalows across the Peninsula which are close to local amenities, have good public transport links all will allow for down-sizing.

It is noted that there is limited development planned for Strood Rural, and also no consideration given to development in Grain village. The majority of housebuilding has been planned for Hoo and High Halstow, and all Parish Councils believe this level of development to be unsustainable due to the essential need for better infrastructure and the impact the building work would have on the wider community.

Whilst appreciative of the constraints on building on Grain, the local Parish Council believe that further development is needed to support young families who currently live in the village.

Kingsnorth is also another area which could be earmarked for development. A brand new village can be built at the former power station site, and it would make for an attractive new estate with river view properties available, although again suitable transport infrastructure will be needed.

Consideration should also be given to developing other parts of Medway, not just on the Peninsula. There are many sites across Medway that were earmarked for potential development in the 2017 Regulation 18 consultation which have been removed in the 2018 consultation without explanation. The regeneration of Chatham and Gillingham town centre. There is the potential for new social housing in these areas through the demolishment of underused retail space and the utilisation of Mountbatten House in Chatham.

These options would help to spread development throughout the whole region, and therefore reduce the housing demands on the Peninsula – especially on Hoo St Werburgh.

- **Objections:**

- **The housing target of 10,000 to 12,000 for the Peninsula is unsustainable.**
- **All four scenarios would see major development on the Hoo Peninsula. In its current format, the amount of houses planned would be detrimental to the beauty and future of the Peninsula and will put further pressure on our current infrastructure.**
- **Homes should be targeted and built for local people.**

- **Suggestions:**

- **Development should be evenly spread across the Medway Towns, and pressure should be taken off Hoo St Werburgh in providing the majority of houses.**
- **Give consideration to the ageing population on the Peninsula and the wider Medway community. More care homes/supported living accommodation is needed.**
- **Further development to be considered at Grain as well as the potential creation of the new Kingsnorth town.**
- **Consideration needs to be given to developing other parts of Medway. A visionary plan is needed to transform urban areas to accommodate more housing which would alleviate pressure on the Peninsula.**

2. Environment

The Hoo Peninsula is blessed with acres of greenspace and farmland. It is a truly unique place in the Medway Towns and one which many local people aspire to move to. We are fortunate to have many SSSI areas as well as places of historical, cultural and local value – for these reasons, development on the Peninsula is made all the more difficult.

Development at Lodge Hill SSSI has always been and remains a bone of contention for all parties. It has national and international protections and housing in this area should only be considered if the wildlife can be sustained. The local Member of Parliament, Kelly Tolhurst MP, is a Nightingale Species champion and has recently spoken out for the protection of Lodge Hill and Deangate Ridge Golf Course. These are two community assets which have so much to offer wildlife and residents across the Hoo Peninsula.

Except for scenario 4, it is acknowledged and appreciated that scenarios 1-3 of the Local Plan Development Strategy do not include direct land take from the Chattenden Woods and Lodge Hill SSSI. Under NPPF, a Local Authority is required to seek to avoid developing on a SSSI, and the Council has proven that this is possible. However, the Lodge Hill site still remains under threat of development from Homes England and all scenarios show development in very close proximity to the Lodge Hill site. This is contrary to the Council's own obligations to biodiversity and their vision for Medway to be "noted for its stunning natural assets and countryside".

The RSPB in particular have called for the withdrawal of Scenario 4 from the draft Local Plan, as it has been outlined in the other scenarios that there are alternatives to avoid building on Lodge Hill. This is a view also supported by the local MP and the Parish Councils serving the Peninsula.

The Council should also consider developing Lodge Hill and the Deangate Ridge Golf Course into a countryside park, in a way that does not compromise the nationally important wildlife on the site. This would have significant health benefit for wildlife and the wider community, with opportunities for leisure and recreational activities too.

As well as concerns for sensitive sites, we also believe that air quality is another important consideration. With the high levels of housing expected, an increase in road traffic will only exacerbate the air pollution in Medway – especially at Four Elms Hill Roundabout and other areas such as Wainscott.

- **Objections:**
 - **Scenario 4 is not sustainable and would harm nationally important wildlife/biodiversity, in contravention of NPPF.**
 - **Scenarios 1-3 have development so close to the SSSI that it would cause damage to the nationally important wildlife**
- **Suggestions:**
 - **Withdrawal of scenario 4, given the alternative options set out in the three other scenarios.**
 - **Consideration to be given to Lodge Hill/Deangate Ridge Golf Course on forming a countryside park which would be of great benefit to Medway-wide community.**

- **Council to consider the imposition of a land buffer for scenarios 1-3 in order to safeguard protected sites, due to the proximity of proposed new housing.**
- **Give consideration to the air quality in Medway and the improvements needed to junction of Four Elms Hill roundabout.**

3. Infrastructure

The Peninsula currently has only one access road which is seriously affected at peak traffic times with constant delays at Wainscott, Frindsbury, Medway City estate and the tunnel.

Four Elms Hill is often slow moving and sometimes closed during accident or severe weather conditions. This road is already overburdened. Bus services are not coping or running to schedule at present causing anxiety for residents who many have important appointments to attend.

The traffic bottleneck constantly seen at Four Elms Hill and its roundabout will increase considerably – to the detriment of all residents and businesses beyond. There is a single road from Lower Stoke on to Grain to carry industrial/commercial vehicles at a high volume along with residents' vehicles travelling to other areas for employment, leisure, healthcare and schools. Should there be issues on any section of this road the residents of Grain are trapped, should any issues occur on the Four Elms roundabout – the whole of the Peninsula is trapped.

Most recently, Bells Lane in Hoo has been closed due to subsidence of the new Bellway development. This has caused much distress and worry amongst local residents, and has seen Main Road becoming dangerously congested. With the level of housing expected in Hoo, traffic congestion will severely increase and if a similar road closure was to happen, we ask what assurances the Council could give to ensure that this essential primary route will be re-opened as soon as possible.

There is a major problem with parking in all the local Peninsula villages as residents have to use their cars by necessity. Any new development must provide adequate parking for residents (at least 2 family sized cars per household).

From the draft Local Plan, it is clear that healthcare on the Peninsula will suffer considerably. All GP surgeries on the Peninsula are at full capacity, and the health inequalities in Medway makes it difficult to recruit GPs to the area. Many patients no longer attend branch surgeries as there is no guarantee a doctor will be available but choose, instead, to attend the main surgery. This could lead to the closure of branch surgeries (through lack of use) which would limit access to healthcare for patients without private transport.

Medway Hospital is already under extreme pressure, and residents on the Peninsula have the furthest to travel in order to access emergency treatment. There is a great need for a walk-in centre on the Peninsula to support the needs of residents, especially with the proposed number of housing.

Furthermore, Medway has been listed as an area of water stress and developments must be water friendly and rainwater transfer facilities must be incorporated to all new homes.

- **Objections:**
 - **The Peninsula cannot cope with the congestion it has on the roads now**
 - **There are no adequate emergency care facilities on the Peninsula, and GP surgeries are already at capacity.**
- **Suggestions:**
 - **No housing allocation for the Peninsula until there is a masterplan in place that shows how the houses would be supported by a holistic programme of infrastructure. Without a masterplan, there is no sense that what the Council is currently proposing is realistic or achievable**
 - **Creation of a new road to Grain and Allhallows allowing for another source of exit.**
 - **Creation of a walk-in health centre on the Peninsula**
 - **Review of the traffic at Four Elms Hill and increased road capacity in this area.**
 - **Consideration to be given to the scarcity of water in Medway and assurances on how new homes/families will be supported.**
 - **New developments must have adequate parking space for households.**

In summary, we hope that the points raised in our letter of representation has given Medway Council a clear indication of our objection to the unsustainable amount of homes planned for the Peninsula.

We respectfully argue that Medway Council have not adequately demonstrated the sustainability of their Local Plan, and there still remains many holes in the strategy that Medway Council is working towards in order to plan for improved infrastructure, the protection of our natural environment, and build sustainable homes for local people.

On a final point, we have also been concerned with the delay in publishing the sustainability appraisals and also the lack of engagement events on the Peninsula for this crucial phase of the Local Plan. We appreciate that the deadline was extended, however, despite our best efforts, there are still many local people who are unaware of how this Local Plan will be likely to impact their community.

It is essential that everyone is given a chance to respond to this important policy, and Medway Council could have done more to promote it on the Peninsula – especially in Hoo where the majority of the housing is proposed.

Yours sincerely

Kelly Tolhurst MP, Member of Parliament for Rochester and Strood

Cllr Phil Filmer, Peninsula Ward – Medway Council

Cllr Christopher Draper, Chair – Allhallows Parish Council

Cllr Sue McDermid, Chair – Cliffe & Cliffe Woods Parish Council

Cllr Kevin Boyle, Chair – Cooling Parish Council

Cllr David Coomber, Chair – Frindsbury Extra Parish Council

Cllr George Crozer, Chair – High Halstow Parish Council

Cllr John Tildesley, Chair – Hoo Parish Council

Cllr Veronica Cordier, Chair – St James Isle of Grain Parish Council

Cllr Malcolm Budd, Chair – St Mary Hoo Parish Council

Cllr Brian Stone, Chair – Stoke Parish Council