



Historic England

Planning Policy Team
Medway Council
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By email only to futuremedway@medway.gov.uk

Our ref: PL00347123

Your ref:

Telephone

Fax

Email

Date

20 June 2018

Dear Sir / Madam

Future Medway: Development Strategy Regulation 18 Consultation

Thank you for your email of 3 May 2018 inviting comments on the above document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document. Historic England's comments are set out detail below broadly in the order that they appear in the draft Local Plan:

Section 2 Vision and Strategic Objectives (Question DS 1) – we appreciate that the vision for the future Medway seeks to achieve the difficult balance of development and regeneration requirements, social needs and the protection and enhancement of environmental assets, including the historic environment. The highlight box on page 20, headed **Developing a vision for 2035**, sets out an ambitious and potentially unachievable picture of the area over the next 20 years; we believe a more realistic portrait may need to be prepared. Having said this, we welcome the references and acknowledgments of the importance of protecting and enhancing the heritage of Medway and integrating this with regeneration of the area. We would hope this level of heritage awareness is retained (if not strengthened) in any refinement of the Vision.

Section 3 Development Strategy (and associated appendices) – it is not for Historic England to comment in detail on the preferred scenario for accommodating the substantial levels of growth planned in Medway derived from the objectively assessed needs and government requirements. In our view, all will have both possible harmful impacts on the historic environment which will need to be avoided or mitigated, and also potential for enhancement of specific sites and places of heritage significance. We comment on some of these below, most of which will be common to all or most scenarios, but all of which will require more detailed assessment of the implications for heritage assets through site briefs, masterplans or planning applications if not through a sites allocations part of the Development Plan. We would be pleased to input to these assessments as they come forward, and have contributed to a number to date – Chatham Interface, Chatham town centre masterplan, Strood masterplan, etc.

Other sites that we have a particular interest in include:

Frindsbury Extra - where securing a sustainable future for the grade I listed barn which is at risk, without harming its setting, is a major challenge. Some housing and a school is proposed in and around the quarry that may be a part of a financial solution to the barn.

Rochester is undergoing significant pressure for development at present, much of it focussed on Corporation Street for residential and hotel development, and the later phases of Rochester Riverside are yet to be finalised in terms of design and form. These locations are of major heritage sensitivity for their potential to affect the setting of the castle and cathedral, in particular, and the historic core of the town. Tall buildings development in these locations and potentially at Bardells Wharf where Rochester meets Chatham Intra should be carefully planned and managed. A robust tall buildings policy is needed for this purpose.

Chatham Intra remains an area which we think is under appreciated for its heritage significance (and thus probably under represented on the National Heritage List for England). It is an area of change which if handled appropriately could unlock major gains for the historic environment. A carefully planned, heritage-led approach to the regeneration of this area is required in our view.

The Hoo Peninsula is in all scenarios for meeting assessed housing need identified for major change. Our published landscape research here should be referenced as needing to inform decisions - <https://historicengland.org.uk/images-books/publications/hoo-peninsula-landscape/>. We endorse the need for masterplans at any of the major locations for potential development. A new rural town centred on Hoo St Werburgh raises some historic environment issues but we need more information to be able to determine if there will be potential harmful effects on the historic environment. We would be pleased to discuss these with the Council and promoters if and when they come forward.

If the principle of major development at Lodge Hill is revisited by Homes England, despite the SSSI issues, then we will need to engage for the former Lodge Hill camp. The ordnance buildings here were considered for listing and are of local heritage significance at least. We would wish to ensure that any masterplan responds to the former layout of the site, and where possible preserves some of the undesignated heritage assets. There are a few designated heritage assets on the site; i.e. a WW1 anti-aircraft gun site as a scheduled monument and WW1 period hardened sentry posts as grade II listed. The AA site is probably a candidate for the heritage at risk register and if development is not to secure its future an alternative plan will be needed to preserve it.

Section 8 Built Environment – Policy BE1 provides a broadly suitable framework for considering the effects of new development and fostering good design. However, as mentioned above, we have been concerned that some proposals for tall buildings, both historically and currently, could have negative, harmful impacts on the setting of heritage assets and that there is not a fully formed policy framework for considering these. Given the density of heritage assets and their ubiquity across the Medway towns, we would recommend a specific tall buildings (and views) policy supported by detailed guidance on the assessments of impacts on views and settings. We would be pleased to advise on this.



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Policy BE5 is does not adequately set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by the NPPF paragraphs 126 and 157. It should contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 156). The current proposed wording is essentially focussed on controlling development that may affect the historic environment, which may be needed also, but has lost some of the intent behind the NPPF to make conservation of heritage a positive, proactive programme in its own right. A positive strategy in the terms of NPPF paragraphs 9 and 126 is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will make a positive contribution to local character and distinctiveness.

Policy BE5 could be recast in more positive terms along the lines set out in the foregoing paragraphs and much of the text relating to protection of the significance of heritage assets combined with that in policy BE6.

The policy BE5 in its reference to total demolition also mentions public benefits, but the NPPF is clear these should be **substantial** so as to make the test very high and this should be reflected in the wording of the policy.

Para 8.32 has wrongly transcribed the statutory duty of the 1990 Act by describing a need to pay *particular* regard to listed buildings and their settings. The correct term is to have **special** regard and I think this represents a greater weight than reflected in the current wording.

Notwithstanding paragraph 8.30, we consider that the value of undesignated heritage assets, and their potential to contribute to the place making agenda, is under played in the section on historic environment. Medway is full of good but undesignated heritage, Chatham is a prime example, and it would be good to embed an approach which seeks to first identify and then sustain or enhance it where feasible into the general policy on heritage.

Historic England would strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 126).

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

Yours sincerely



Alan Byrne
Historic Environment Planning Adviser



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Hanson is a major supplier of heavy building materials to the construction sector including materials such as cement, aggregates and concrete to asphalt for road surfacing.

This representation is made by Hanson in response to Medway Council's public consultation on the Development Strategy. Hanson is principally interested in Section 12 - Minerals Waste and Energy.

Hanson operates the minerals-importation wharf at Medway City Estate where marine-dredged ballast is landed from dredgers and processed into locally important building aggregates. Additionally, Hanson produces ready-mixed concrete and operates a small aggregate bagging operation at this location. In the recent past asphalt (coated roadstone) and concrete blocks were also produced at this site.

With regard to the proposed Development Strategy, Hanson is encouraged to see the council intends to keep the safeguarding policies to protect mineral wharves from encroaching development that could prejudice the continued use of the wharves. We support the wording at 12.8 of the development strategy. However, whilst the proposed consultation zone of 250 metres is to be welcomed, this might not be wide enough to provide the necessary protection in waterfront scenarios. Our own experience with aggregates wharves on the River Thames shows that effects of wharf operations can be felt 500m away across open water. Therefore Hanson would like to see the proposed 250 metre zone extended to 500 metres.

Elsewhere in the development strategy, the regeneration of the waterfront is hailed as a major local opportunity. Whilst true, It is important to remember that the waterfront and the river is not only used for leisure but is also used by commerce such as unloading of dredgers. This type of activity unavoidably creates some noise and nearby development should be required to take such impacts into account and provide mitigation measures.

From: [REDACTED]
Sent: 21 June 2018 07:34
To: futuremedway
Subject: High Halstow PC Response

Categories: Blue Category

1. We accept that some extra houses are needed in Medway, but we think that **every** community in Medway must take its share.
2. **BUT** we do **NOT** accept that Medway can accommodate 27,000 more houses between 2017-2035. The Council **MUST** show that they are doing everything possible to get government to agree that this is unsustainable for Medway.
3. We think that 10-12,000 extra houses on the Peninsula is **WAY** too many. That would destroy everything that makes the Peninsula special.
4. The Council admits the number of people in Medway is not increasing as fast as it was - so we ask the Council to recalculate and reduce the total number of houses it needs
5. It is impossible to tell from the consultation what number of houses are allocated where on the Peninsula, so we would like the Council to work with us on a 'masterplan' to include in the Local Plan, before any more housing applications get passed, so we can agree what houses, transport infrastructure (including public transport), doctors, schools, and shops are needed, where and when. The Council must pledge an end to piecemeal development here until that masterplan is in place.
6. We want the masterplan to consider the people who already live here, so that new housing fits in with our lives and our communities and doesn't ruin people's lives.
7. We think the Council hasn't explored several key options that are essential. For example, the Council should consider an attractive development at Kingsnorth. And the Council should consider redevelopment of Chatham town centre with housing options. These must be on the table, not just dismissed.
8. Medway Council must share with the people the plans they have for the roads and railways on the Peninsula, and for tackling air pollution. If the Council already has bids in for funding, there must be plans already, and we should see them.
9. The Local Plan must have more detail about the future of hospitals in Medway. It must include a timeline and possible locations.
10. We want the Council not to sacrifice protected places, such as Lodge Hill SSSI. Protected places should be Medway's trump card to say to government, "Hold on, we've got nationally and internationally protected places here, there's a genuine limit under national rules to what housing can go here".

We are willing to work with Medway Council in a constructive dialogue. We want to know that Medway Council is genuinely willing to work with us.

High Halstow PC

Regards

George
[REDACTED]

21st June 2018

Sent by email to: futuremedway@medway.gov.uk

Medway Council Local Plan 2012-2035 Development Strategy Regulation 18 consultation report

Land at Bridge Lodge, Four Elms Hill, Chattenden

Thank you for the opportunity to comment on the above document. (We previously promoted the above site in a letter from Peter Court Associates dated 2nd February 2017)

Overall Planning Strategy and Framework

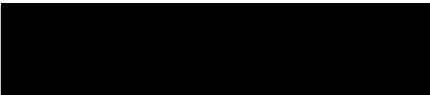

With regard to the above, we draw your attention to the submitted views of the Homebuilders Federation (HBF) which deals with a commentary on the technical basis of the document. In summary, we support a development strategy based on a new standard methodology to produce a level of housing at 37,143 dwellings. The new Plan should plan for the maximum level of housing growth to ensure that it delivers a level of housing to meet the needs as set out by the Government's proposed new methodology.

Currently the planning authority accepts that it does not have a five year housing land supply and it is important that this position is rectified as a matter of urgency. Given the availability of our land at Four Elms Hill, as outlined on the attached plan, we seek to provide a new housing site in Chattenden, an area which has been identified for substantial housing growth at Lodge Hill where Homes England are in the process of promoting a new settlement on the former MOD land. We are of the view that the planning authority should support the release of this land especially as the size of the proposal has been reduced from the original size of 5,000 dwellings. We understand that the Government is keen to release this land and that an application will be submitted in 2019 for a scheme of approximately 2,000 dwellings. This is a lesser number than envisaged in your document. It is hoped that this concept can be supported and included in the new Local Plan.

The company has already had meetings with planning officers and Members of the Council regarding this site and we are keen to see our **site allocated for 20 dwellings**. Currently, this indicative figure has been determined by your highways department and we will shortly submit an outline planning application to take the principle of development forward. We are taking this action as the site is a sustainable location with no specific over riding environmental constraints and planning permission will assist in addressing the Council's five year land supply which is at a seriously low level. There is now a presumption in favour of housing development as prescribed in the NPPF, and we are seeking the Council's support for the release of this land which is of no environmental value.

We trust that our position is self-explanatory, but should you want additional information please do not hesitate to contact us.

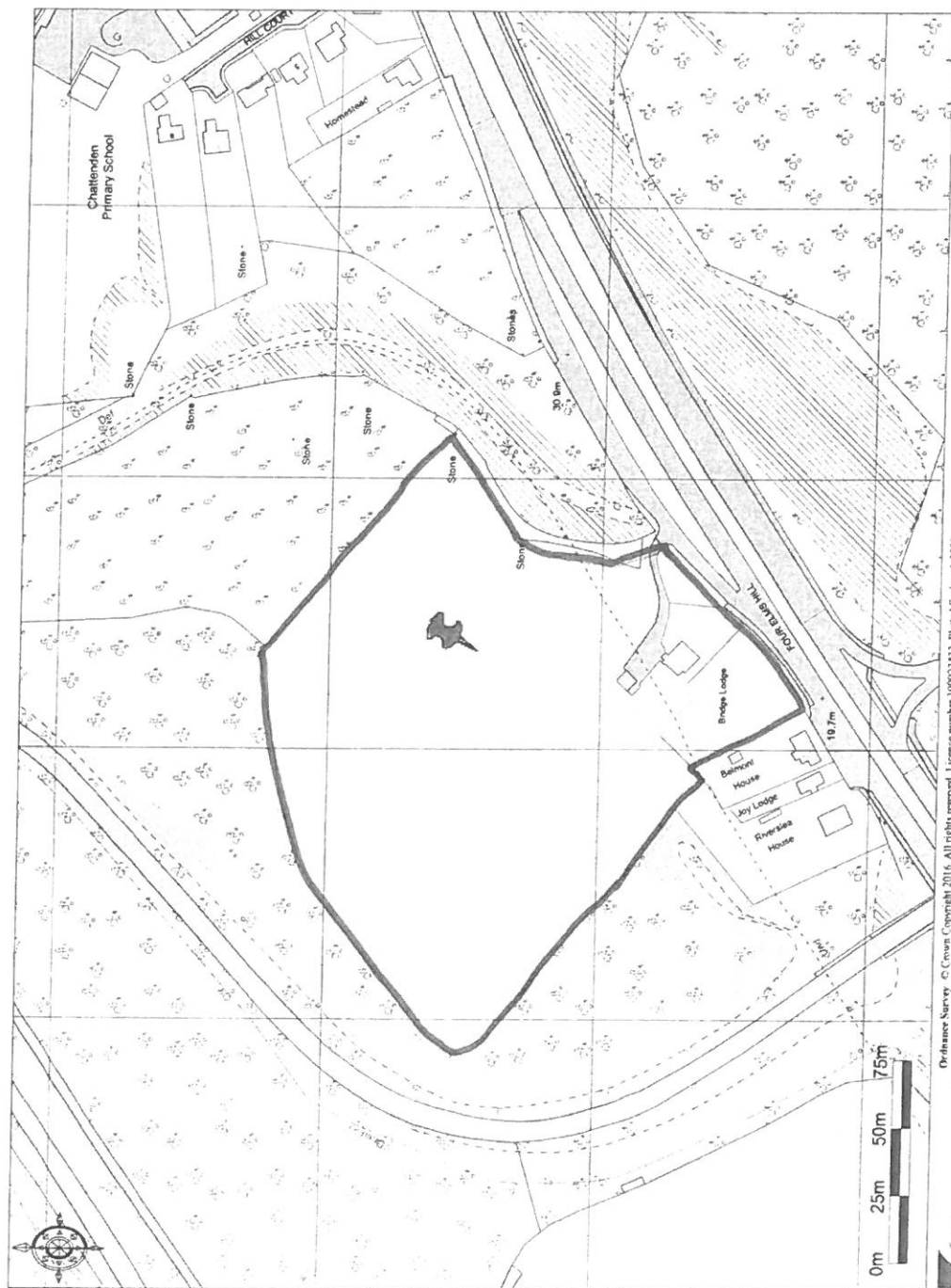
Yours sincerely


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LAND AT CHATTENDEN, KENT



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maryott, kyle

From: [REDACTED]
Sent: 21 June 2018 10:28
To: futuremedway
Cc: [REDACTED]
Subject: Flanders Farm, Ratcliffe Highway, Hoo St Werburgh, ME3 8QE
Attachments: FLANDERS FARM PLAN.pdf

Categories: Blue Category

Dear Sirs

Further to the development strategy consultation being undertaken by your office, entitled "Future Medway," we would wish you to give detailed consideration to the above facility.

We refer to a recent visit to the facility by members of the Planning Committee. Various issues were raised which the members of the Committee would wish to see addressed. We consider it would be advantageous to identify this site and its immediately adjacent land as a further potential employment hub within the proposals for the expansion of Hoo St Werburgh. This employment hub should be with a focus towards horticulture. For clarity, we attach the extract from the Ordinance Survey identifying the areas of land we specifically refer to. For completeness, a more detailed spatial layout in the form of a site specific master plan is currently being prepared and will be forwarded to your office in due course for detailed consideration.

Regards

Nick Brandreth for A C Goatham and Sons



N P Brandreth BSc FRICS
Director

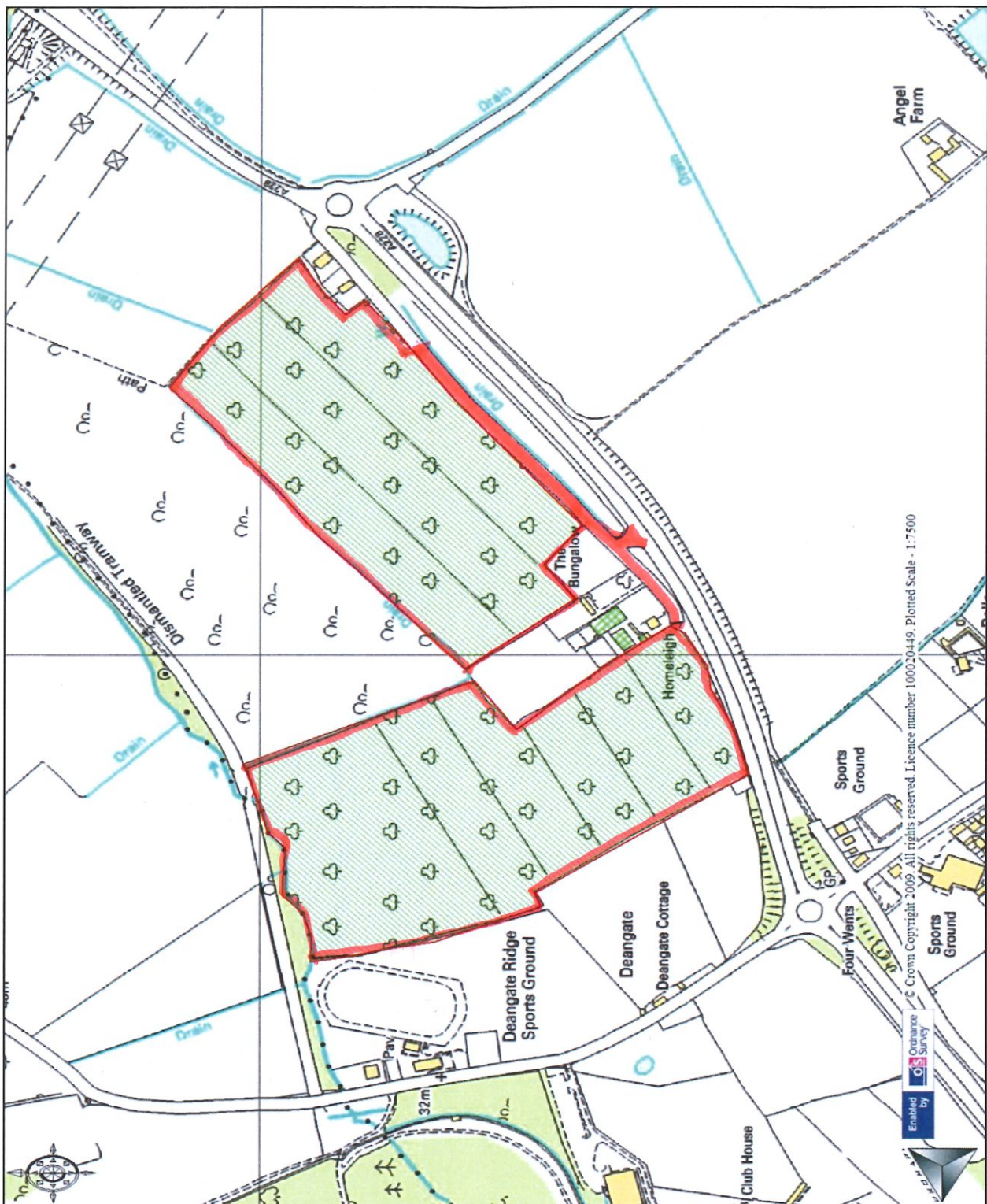
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9.3 FLANDERS FARM PLAN





***MEDWAY LOCAL PLAN
2012-2035***

***DEVELOPMENT STRATEGY
CONSULTATION
RESPONSE***



**June 2018
DHA/12270**

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1 Introduction

1.1 Purpose of this Statement

- 1.1.1 These representations have been prepared on behalf of Bellway Homes in respect of Medway Council's current Local Plan 'Development Strategy' Local Plan Consultation 2018.
- 1.1.2 Medway Council is in the process of preparing a new Local Plan to set out a strategy for development for the period 2012 to 2035 and is asking for views on 'Development Strategy' as a follow up to the 'Development Options' and 'Issues and Options' consultation that informed the early stages of the preparation of the plan. These representations are provided in order to aid the Council in the achievement of a sound replacement plan.
- 1.1.3 Bellway Homes has an interest in land at Brompton Farm, Strood, which we believe represents a suitable and sustainable location to sensitively amend the Green Belt boundary for inclusion as a residential allocation.
- 1.1.4 These representations are focussed on how the site could assist in delivering the strategic objectives of the Council and how this would align itself with the emerging and updated strategy options. The response primarily focuses upon the four updated scenarios subject to consideration. However, we also take this opportunity to reiterate why our client's land represents a suitable and sustainable site that should be included as a residential allocation as the plan progresses and to provide some further information on Bellway Homes.

1.2 About Bellway

- 1.2.1 In 70 years, Bellway has grown from a small, family-owned firm to being one of the top 5 largest housebuilders in the UK.
- 1.2.2 Bellway have dedicated workforce of over 2,000 people and built and sold over 9,000 homes last year nationwide. The Division's pipeline of current developments is as follows:
 - 360 houses and flats, Peter's Village, Wouldham
 - 110 houses, Folkestone
 - 120 houses, Stone Cross
 - 73 houses, Signature, Kings Hill
 - 86 houses and flats at Hermitage Lane, Maidstone
 - 186 houses and flats at Imperial Park, Maidstone
 - 250 houses and flats, south east Maidstone
 - 156 houses and flats, Gravesend
- 1.2.3 Bellway has a good track record of delivering residential development through the planning process and have also developed in Hoo and the Medway towns in recent years.

1.3 Document Structure

- 1.3.1 Chapter 2 provides feedback on the potential development options being considered by the Council as part of the current consultation.

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

2 Comments on the Development Options

2.1 Vision and Strategic Objectives

2.1.1 We understand that the intended role of the Medway Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment.

2.1.2 The core plan objectives of the emerging Local Plan are broken down into four sub categories, which include the following:

'A place that works well'

- To boost the performance of the local economy by supporting local businesses to grow and attracting inward investment through the provision of good quality employment land that meets the needs of businesses, and to secure and extend higher value employment opportunities;
- To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses;
- To ensure Medway's recognition as a University city and realise economic and place making opportunities associated with the learning cluster of higher and further education providers in Medway;
- To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services;
- To strengthen and develop the transport network providing safe and effective choices for travel, including management of the highways network, enhanced public transport systems, and improved opportunities for walking and cycling, with associated improvements in air quality.

'A riverside city connected to its natural surroundings'

- To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development.
- To address the challenges of climate change, seeking adaptations and opportunities to promote carbon reduction and mitigation measures, and reduce the risk of flooding;
- To ensure the effective management of natural resources, including water, air and soil, and the sustainable supply of minerals and appropriate management of waste.

'Medway recognised for its quality of life'

- To reduce inequalities in health by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public

realm design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of local services and dementia friendly environments;

- To provide for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs;
- To strengthen the role of Medway's town, neighbourhood and village centres, securing a range of accessible services and facilities for local communities, and opportunities for homes and jobs, with Chatham providing the focus for new retail and community facilities.

'Ambitious in attracting investment and successful in place making'

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

2.1.3 These strategic objectives are as outlined within the previous 'Development Options' consultation in 2017.

2.1.4 We would therefore reiterate that we support the principle of all of the objectives and the foundations of the emerging plan. However, we would continue to suggest some minor modification is needed to ensure the plan is positively prepared and fully aligned with the provisions of both the current and emerging revised National Planning Policy Framework (NPPF).

2.1.5 Specifically, we consider objectives should be modified to provide more certainty that the scope to provide the full 37,000 home housing target will be fully explored if Medway is to secure its role as a vibrant city (rather than a collection of merged towns).

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

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

2.2 Sustainable Development Options

- 2.2.1 Having regard to the options being considered, we understand the support for the promotion of brownfield land ahead of Greenfield sites. Nevertheless, given the known housing need, and the pending introduction of a standardised methodology that will raise this further, it is inevitable that substantial amounts of greenfield land will be needed. This should therefore take place in the most sustainable locations with the necessary capacity for growth.
- 2.2.2 Given Brompton Farm is one of the most natural and sustainable locations to extend existing settlements, and having regard to the future options being considered by Gravesham Borough Council to potentially further enclose the site (west of Strood), which will further enhance sustainability, we consider the Local Plan review is duty bound to undertake a comprehensive Green Belt review and whether there remains a strategic need to retain the Green Belt in this area.

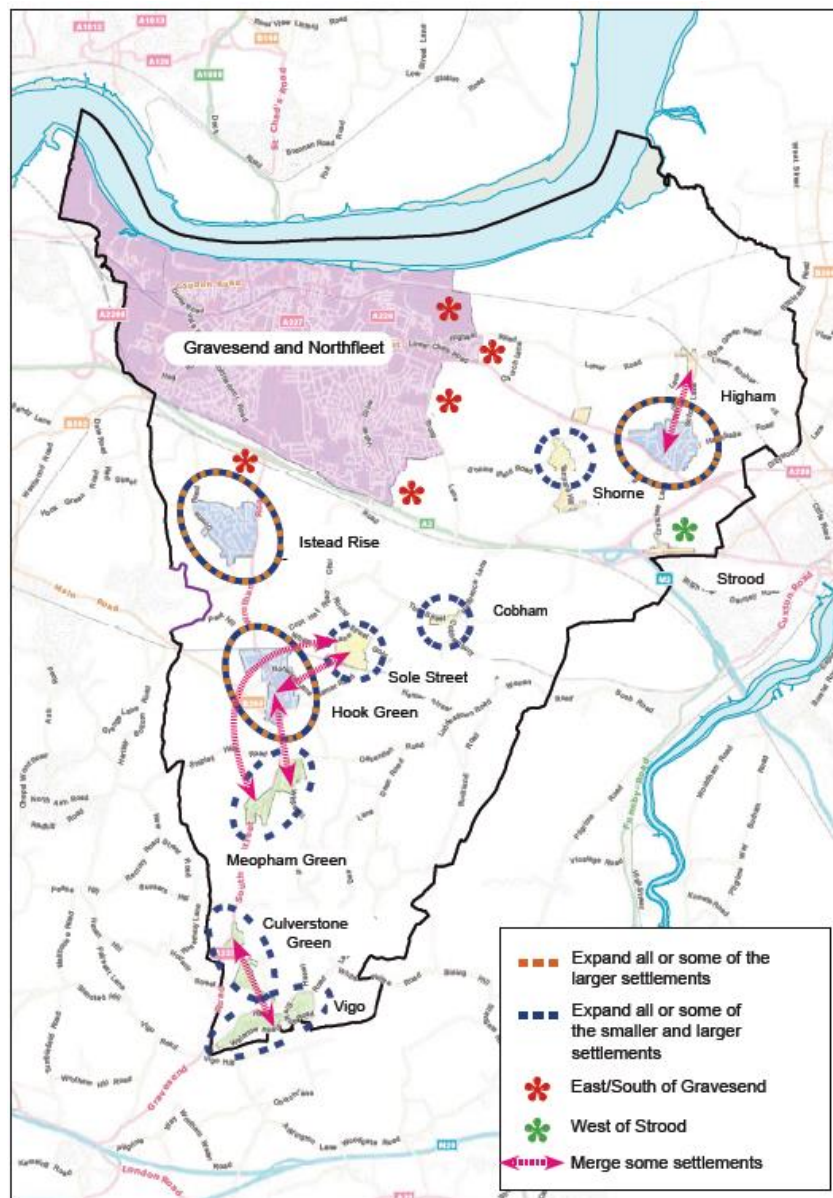


Illustration from Gravesham Borough Council Consultation showing the option of land west of Strood.

- 2.2.3 In our view there are sound planning grounds to allow this site to be released in lieu of wider compensatory improvements to the Green Belt.

2.3 Development Scenarios

- 2.3.1 We note that the consultation document presents four development scenarios to meet the aims of the local plan, which are summarised below:

1. Meeting the assessed housing need of 29,500 homes-

Development scenario 1 seeks to meet the councils objectively assessed need of 29,500 homes across the plan period. This would focus housing on brownfield urban sites, but also involves the proposed development of a rural town on the Hoo peninsula and suburban expansion. This scenario does not include development of Lodge Hill. In line with the Councils analysis of the number of homes needed to support the area's population growth and change up to 2035. The broad distribution of development would be as follows:

- Urban sites- 12,775 dwellings
- Hoo peninsula- 9,318 dwellings
- Suburban sites- 4,528 dwellings.

2. Investment in infrastructure to unlock growth-

Development scenario 2 takes a similar approach to scenario 1 but with a greater emphasis placed on securing funding for infrastructure that would facilitate higher density of development on the hoo peninsula and a faster rate of delivery. This would reduce the need to release land in suburban locations and increase the overall supply of housing to 31,000 homes. The broad distribution of development would be as follows:

- Urban sites- 12,775 dwellings;
- Hoo peninsula- 11,750 dwellings;
- Suburban sites- 3179 dwellings;

3. Meeting Governments target of local housing need of 37,000 homes-

Development scenario 3 presents a strategy for growth that responds to the definition of local housing need by the government's proposed standard method, which calculate a need for 37,000 homes. This approach would be reliant on a greater amount of development in suburban locations. The broad distribution of development would be as follows; higher density urban regeneration and a potential loss of employment sites.

- Urban sites- 14,194 dwellings;
- Hoo peninsula- 12,162 dwellings;
- Suburban sites- 6,276 dwellings.

4. Development of Lodge Hill SSSI

Development scenario 4 would use land at Lodge Hill- which is designated as a Site of Special Scientific Interest (SSI) - to create a new settlement on the hoo peninsula. 2,000 homes are proposed with supporting services, with the majority of land protected from

development. This approach would reduce the need for suburban expansion and would provide funding for nature conservation projects

- Urban sites- 12,775 dwellings;
- Hoo peninsula- 10,357 dwellings;
- Suburban sites- 4,108 dwellings.

2.3.2 In considering the four options presented, we are concerned about confusion between targets and associated strategies. For example, to properly consider the effectiveness of a strategy a consistent benchmark is needed. Accordingly, the housing option for all options should be the achievement of 37,000 new homes within the plan period. Thereafter, views should be sought on which planning strategy would best achieve the required 37,000 home target with the flexibility to rapidly respond to change.

2.3.3 Without the consistency, there is a genuine risk of selecting the right strategy with the wrong housing target or vice versa. For the avoidance of doubt, we consider the options that should be considered should more accurately be presented as follows:

- .1. Scenario 1 should consider how 37,000 homes can be achieved primarily by focussing housing on brownfield urban sites, the development of a rural town on the Hoo peninsula and further but limited suburban expansions;
- .2. Scenario 2 presumably should take a similar approach to scenario 1 and should consider how 37,000 homes could be delivered, but with a greater emphasis on infrastructure to support the delivery of the Hoo peninsula, a faster rate of delivery and reduced reliance on suburban sites;
- .3. Scenario 3 should focus how 37,000 homes can be accommodated with greater emphasis on suburban growth;
- .4. Scenario 4 focus should factor in the potential for growth at Lodge Hill to accommodate the 37,000 homes.

2.3.4 In our view, the strategy options need refinement. Scenarios 1, 3 and 4 are much the same strategy, with the only variants being the housing target and the location of growth on the Hoo Peninsula. They are not therefore different or bespoke options. Given the lack of clarity, we respectfully suggest that Medway go back and review options in two key stages;

- .1. First, assess the level of growth that should be accommodated; 29,500, 31,000 or 37,000 homes; and
- .2. Then, establish the strategy options for meeting this growth and how such development would be dispersed.

2.3.5 Notwithstanding that we consider further work is needed, we favour a strategy based upon an appropriate mix of urban and suburban sites and growth at Hoo. However, caution must also be had to the reliance upon the creation of a rural settlement on the Hoo peninsula, which would account for over a third of the council's proposed housing numbers. If this approach is to be followed, the level of urban and suburban sites must be significant enough to deliver constant delivery of housing whilst key planning principles and infrastructure is considered. Likewise, the Council continues to put too much

emphasis on Lodge Hill despite the ongoing question marks over its suitability and delivery. If this site is to be included, the plan requires sufficient flexibility to ensure it will not be undermined if the site is delayed.

- 2.3.6 We consider that Medway must also review the possibility of Green Belt release and we consider it unsound that none of the scenarios include consideration of this as an approach or a reasonable option.
- 2.3.7 We do, of course, appreciate that section 9 of the NPPF seeks to protect Green Belt land and that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Nonetheless, paragraph 83 of the NPPF also states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.
- 2.3.8 Whilst it is acknowledged that Medway only has a small element of Green Belt, housing targets have fallen so short of the level of the homes that are required that every opportunity must be explored to identify land to meet its full market and affordable housing requirement in a sustainable way.
- 2.3.9 Housing pressures alone represent Exceptional Circumstances for Green Belt release and this should take place in the most sustainable locations such as our client's land, which benefits from such strong and defensible boundaries. In this regard, the emerging revisions to the NPPF are clear that planning authorities must fully examine "all other reasonable options" for meeting their identified development needs before releasing green belt, but the Exceptional Circumstances provision remains and when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.
- 2.3.10 The draft NPPF directs that strategic plan-making authorities 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. 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.
- 2.3.11 Given the logical nature of the release of Brompton Farm, we consider Green Belt release much be considered as part of the suburban site release options.
- 2.3.12 In summary, we consider that none of the updated scenarios provide the right balance as drafted and all are inconsistent working from different overall objectives. Furthermore, the exclusion of Green Belt sites from scenario 4 'mix' undermines the effectiveness of all of the options. In simple terms, we favour a polycentric approach to the distribution of development, which would see a spread of growth distributed proportionally to lessen the need for major strategic growth in any one location. Of course, the focus should be regeneration of existing built up and waterfront areas and the prudent re-use of

brownfield land. However, taking a pragmatic approach to releasing Green Belt can have a positive role in preserving more environmentally sensitive land.

2.4 Deliverability Concerns

- 2.4.1 As set out in 2017, we are concerned that the scenarios presented do not have enough regard to delivery and legacy. For example, a strategy dominated by small to mid-sized sites disbursed throughout the suburban areas may not generate the critical mass required for significant improvements to infrastructure (schools, highways and healthcare) to benefit existing and new communities. Careful infrastructure planning is therefore needed to ensure that development impact is mitigated in a coordinated way.
- 2.4.2 A geographical spread of sites is advantageous and promotes a steady delivery of homes throughout the Borough, which if part of a coordinated strategy, would assist with delivering a good mix of units.
- 2.4.3 In contrast, we have concerns that strategic development of an area such as Hoo Peninsula would deliver a larger 'pot' of money to invest in new physical and social infrastructure, but would also place much greater burden on existing resources. Furthermore, whilst development of a scale of several thousand houses will generate large income directly related to the development, it will not generate the funds needed to mitigate against the cumulative levels of development within the area.
- 2.4.4 Consideration must also be given to how sites are delivered. Traditionally, strategic sized regeneration based housing sites are complex and often delayed. Accordingly, it does not follow that development will be delivered at the maximum and quickest rates possible, particularly if there are changes in market conditions. For this reason, regard must be had to the value and contribution of sites controlled by developers such as Bellway, with a track record of delivery.
- 2.4.5 In addition to the above, it is important to note that the emerging revisions to the NPPF include a housing delivery test. It is therefore essential that any strategy is built upon realism and that sites that are brought forward are controlled by those, such as Bellway homes, that have a proven track record of delivering units. In summary, the need to facilitate a steady supply of homes supports a strategy that is based upon a range of size, sizes, types and locations.

3 Comments on the General Policy Approaches

3.1 Housing Delivery and Mix

- 3.1.1 In line with the emerging updated NPPF, we consider the Local Plan should be based upon a housing target that reflects the Government's Standard Methodology for calculating housing need. The starting point should therefore be the achievement of 37,000 homes with sufficient flexibility to rapidly be able to respond to changes in circumstance.

3.2 Affordable Housing

- 3.2.1 We note that initial analysis indicates a percentage of 30% affordable housing in rural areas and 25% in urban Medway on residential developments over 15 units.
- 3.2.2 We support the inclusion of this as a formal threshold, subject to the policy containing sufficient flexibility to allow a departure where viability is likely to be undermined.

3.3 Supported Housing, Nursing Homes and Older Persons Accommodation

- 3.3.1 We note that the development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs will be supported where it:

1. *Meets a proven need for that particular type of accommodation.*
2. *Is well designed to meet the particular requirements of residents with social, physical, mental and or health care needs.*
3. *Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence.*
4. *Will not lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area.*

- 3.3.2 We continue to support the principle of this approach, but feel that dedicated allocations would be needed. Often these types of facilities should be sustainably located on the outskirts of existing settlements, where sufficient space exists to deliver high quality environments to meet the sensitive needs of the occupants, which still providing a basic range of accessible facilities.

3.4 Green Belt

- 3.4.1 We are pleased to note that it is acknowledged that Green Belt is a not a formal environmental designation and that its primary purpose is to prevent urban sprawl by keeping land permanently open. However, we would reiterate again that whilst we appreciate that it has been successful in retaining a strategic gap between Strood and Gravesend, and prevented the coalescence of Strood and Higham, this does not mean that the sensitive release of some Green Belt land will result in these successes being undermined or eroded. To the contrary, we consider there is a balance to be reached in

respect of release of some sustainable Green Belt land and preservation more important an open areas that play the key anti-coalescence role.

- 3.4.2 We note that the consultation documents states that if the council determine that there are no such exceptional circumstances to support the release of Green Belt land, it will adhere to its policy that development will be restricted in this location, in line with national policy to ensure that the land remains permanently open. However, we would reiterate again that from a national perspective, it has been well established that facilitating housing need is tantamount to exceptional circumstances.

4 Promotion of Brompton Farm, Strood

4.1 Overview

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



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

4.2 Planning Policy Context

The National Planning Policy Framework

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

National Housing Policy

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

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

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

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

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

National Green Belt Policy

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

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

- 4.2.8 Paragraph 83 of the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Summary and Implications of the NPPF

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

4.3 The Emerging NPPF

- 4.3.1 The DNPPF directs that strategic plan-making authorities 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.
- 4.3.2 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.
- 4.3.3 We consider that scope exists to deliver a substantial element of housing at Brompton Farm, whilst also improve the environmental quality of land that is to be retained open and undeveloped.

4.4 Overview of Allocation Sought

4.4.1 Detailed proposals have not been advanced and any future scheme would be subject to early and meaningful engagement with the local community and Medway Council. Nonetheless, in order to assist with the Local Plan preparation a constraints plan has been prepared in order help emphasise how the site could be developed and how the opportunities and constraints could be factored into any wider scheme.

4.4.2 Key constraints are:

5. Proximity to A289 Hasted Road to the north
6. Proximity to Metropolitan Green Belt
7. Existing trees and hedgerows
8. Public rights of way across the site
9. Relationship to existing properties on Brompton Farm Road and Gravesend Road

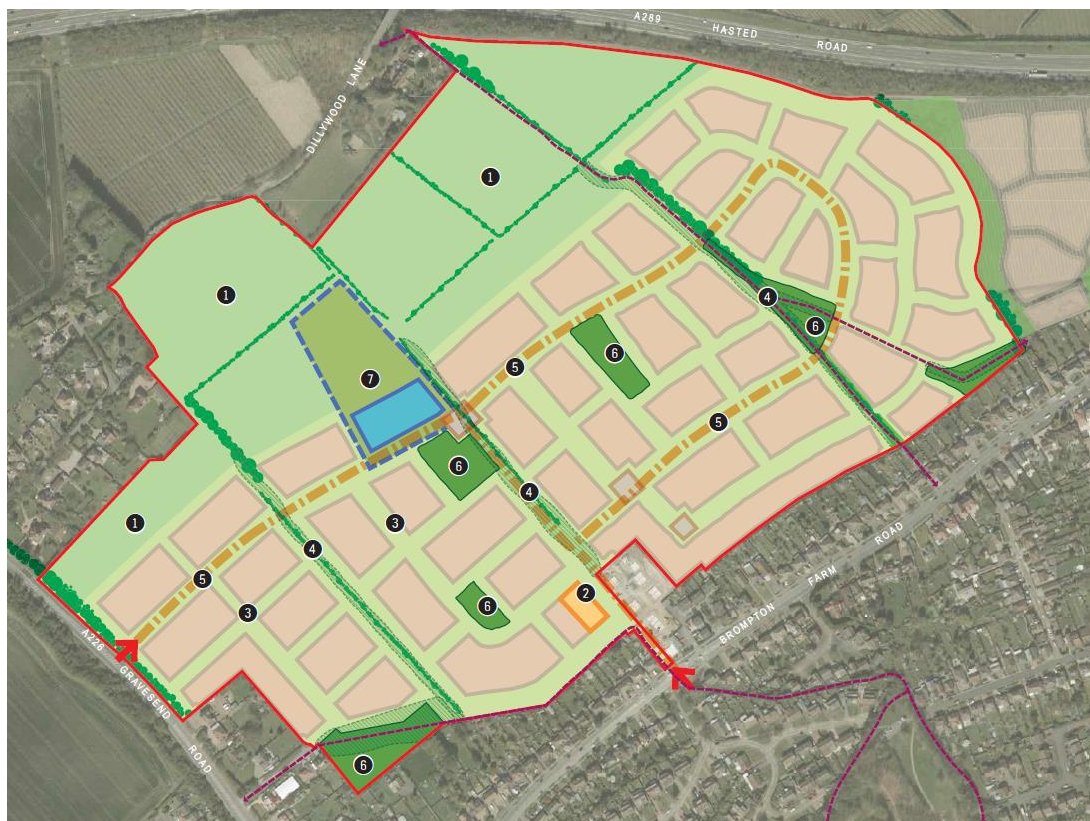


Constraints plan

KEY

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

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



Concept Masterplan

4.5 Planning Appraisal

Green Belt

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

To check the unrestricted sprawl of large built-up areas

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

To prevent neighbouring towns merging in to one another

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

To assist in safeguarding the countryside from encroachment

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

To preserve the setting and special character of historic towns

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

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

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

4.6 Generic Planning Issues

Sustainability

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

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

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

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

- 4.6.2 Development on this site would contribute to the achievement of sustainable development due to a series of economic, social and environmental benefits.
- 4.6.3 Provision of housing would help ensure that sufficient land of the right type is available in a sustainable location within the early phases of the emerging plan period. It would provide new homes in a location where people wish to live, namely in a semi-rural location with excellent access to both town, countryside and essential day to day services.
- 4.6.4 The delivery of housing would also provide an economic benefit during and after build out. Construction jobs would be maintained or created, and household expenditure generated by future residents would support economic activity locally. Housing development would also enable the Council and local community to benefit from revenue linked to Section 106, CIL contributions and a New Homes Bonus.
- 4.6.5 From a social perspective, a suitably designed mix of both open market and affordable residential units would provide housing in a sustainable location that has been in short supply in recent years and that will therefore help see the needs of present and future generations being met.

- 4.6.6 Finally, we consider that in selecting sites for development the wider environmental quality of the authority area must be taken into account. From a visual perspective the concept masterplan presented with this submission is clear that a residential and open space led approach is advocated in order to provide an appropriate form of development and a transition between town and countryside. Likewise, opportunity exists to build upon existing ecological potential and to enhance the habitat for protected and non-protected species alike.
- 4.6.7 Having regard to paragraph 7 of the NPPF and core sustainability objectives, we consider the site is sustainable.

Access

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

4.7 Deliverability

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

Availability

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

Suitability

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

Achievability

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

4.8 Response to SLAA

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

Accessibility and Public Transport

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

Access to the strategic highway network

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

Landscape Impact

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

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

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

Agricultural Land Value

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

4.9 Summary and Conclusion

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



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

21st June 2018

By email only

Dear Catherine

Future Medway: Development Strategy Consultation

Thank you for allowing us the opportunity to respond to the consultation on the Medway Development Strategy consultation.

We recognise the constraints facing Medway Council in the development of a new Local Plan, but CPRE maintains that the Government's proposed methodology for calculating Local Housing Need is fundamentally flawed. The methodology is based on market demand rather than actual needs; it provides no understanding of how Local Plans can reflect a move from these abstract targets to a realistic, deliverable and sustainable housing requirement. Across the wider South East and particularly in Kent the methodology is leading to disproportionately elevated targets which, in reality, will prove impossible to deliver in a sustainable manner.

We therefore offer our robust objection to Scenario 3.

In general CPRE supports development strategies that meet the following criteria:

- Prioritise the re-development of appropriate brownfield sites
- Do not lead to the loss of best and most versatile agricultural land, Green Belts, AONBs and other protective designations

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

CPRE Kent, Queen's Head House, Ashford Road, Charing, Kent, TN27 0AD

Phone: [REDACTED] www.cprekent.org.uk

- Make the best use of available land (in the context of Medway this would mean a very tight focus on urban regeneration at relatively high densities, making best use of infrastructure, services and public transport links)
- Recognises the acute need for rural affordable housing

We therefore welcome Medway Council's renewed commitment to delivering regeneration of brownfield sites, but we retain significant concern at the inclusion of Lodge Hill as one of the strategic options.

We acknowledge the presence of a residual brownfield footprint at the Lodge Hill site, but the NPPF is clear that PDL should be re-used '*provided it is not of high environmental value*'. The site's designation as a SSSI clearly precludes it from being realistically considered as still being a brownfield site. The masterplan indicates significant building incursion on the SSSI, and earlier work in support of the withdrawn application has made it clear that it will not be possible to adequately mitigate harm to an internationally important population of nightingales. We therefore also robustly object to Scenario 4.

With regard to the remaining Scenarios, we consider that any focus of development at Hoo St Werburgh must respect the need to be broadly supported by the local community, and must deliver genuinely affordable housing for local needs as well as appropriate reinforcement of the necessary infrastructure and services. We note that Scenario 3 would "*...require a reliance on ... achieving high densities in appropriate areas*" but suggest that this reliance should also be a prerequisite of Scenarios 1 and 2.

In arriving at housing targets, considerable weight must be given to the very real environmental constraints which exist – not least the fact that the whole of the wider south east is classified by the Environment Agency as '*severely water stressed*'. We note that the SHMA found that Medway has a high requirement for affordable housing: in the light of such constraints, this must be an appropriate point for the Council must proactively seek innovative ways to provide homes in which its community can genuinely afford to live, rather than relying on elevating market housing targets in the hope of cross-subsidising affordable provision.

Finally we note the welcome policy intention (para. 7.35) to address the protection of the unusually tranquil (and locally scarce) areas that exist in the north of the peninsula. We would strongly support robust policies that articulate this protection, and draw your attention to the tranquillity mapping undertaken by CPRE (full map available here: <http://www.cpre.org.uk/resources/countryside/tranquil-places/item/1812>).

Yours sincerely,

Hilary Newport
Director

[REDACTED]

[REDACTED]

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Contact Jenny Knowles
Email [REDACTED]
Your ref.
Our ref.
Date 21/06/2018

Dear Catherine

Re: Medway Council Local Plan 2012-2035 (Development Strategy Regulation 18 Consultation Report

Thank you for consulting Tonbridge and Malling Borough Council on the above document. We submit the following comments as representations to the Medway Council Local Plan 2012-2035 Development Strategy Regulation 18 Consultation Report.

We are encouraged to see that Medway Council appear to be seeking to provide a supply of land to meet the housing needs of 29,463 over the plan period within its administrative area. However it is not clear if Medway Council will be able to meet the proposed standard method for calculating Local Housing Need figure of 37,143 units. At present none of the suggested scenarios appear to meet this figure, and it is unclear at present on the potential yields and phasing from the possible development to support the delivery rates suggested. Clarification on whether Medway Council would be seeking neighbouring authorities to help meet any shortfall would be welcome as would more detailed information on specific site locations, phasing and yields.

We are pleased to see reference to a shared housing market area between Medway and Gravesham Borough Council. However we would like to reiterate those comments made by ourselves during the Medway Local Plan: Issues and Options Consultation in March 2016 and the Development Options Regulation 18 Consultation in April 2017 regarding the Housing Market Area as defined in the Strategic Housing Market Assessment Final Report (November 2015):

“The conclusion on the appropriate Housing Market Area (HMA) for Medway is questioned in light of the evidence presented and taking into account recent Strategic Housing Market Assessments

Planning Policy, Gibson Building, Gibson Drive, Kings Hill, West Malling,
Kent ME19 4LZ

Director of Planning, Housing & Environmental Health:
Steve Humphrey (MRTPI)
Chief Planning Officer: Louise Reid (MRTPI)

Have you tried
contacting us at
[www.tmbc.gov.uk/
do-it-online?](http://www.tmbc.gov.uk/do-it-online?)

prepared by neighbouring authorities including Tonbridge & Malling Borough Council (TMBC).

In light of the evidence on property values including median house prices (see Table 15 and paras.2.87 and 2.101 in the Strategic Housing Market Assessment (SHMA)) and detailed analysis of travel to work patterns and commuting (see para.2.98 in the SHMA), it is considered that including the whole of Tonbridge & Malling Borough in the Medway HMA is an over-simplification that does not accurately reflect the strengths of relationships between Medway and the surrounding areas.

The SHMA on more than one occasion identifies that the strong links with Tonbridge & Malling occur only within the northern parts of that Borough. This is summed up in para. 2.104 of the SHMA. If the evidence points to clear splits across neighbouring authority areas then this should be reflected in the final conclusion on the HMA. Unless the SHMA points to the rest of TMBC sharing similar characteristics in terms of market values and travel to work patterns and commuting then the middle and southern parts of TMBC should not be covered by the Medway HMA.

This more refined analysis would also be more consistent with the conclusion on HMAs exerting an influence over Tonbridge & Malling Borough in the TMBC SHMA.

A more appropriate HMA for Medway would exclude the majority of Tonbridge & Malling Borough with the exception of the northern reaches. Para. 2.101 in the SHMA identifies these northern reaches as being those areas north of the London-Maidstone rail line. This is borne out by the evidence on property values (including medium house prices) and detailed analysis of travel to work patterns and commuting which identifies that the strong links with TMBC do not extend below the northern part of that borough closest to Medway. This would be more consistent with the conclusion on the HMAs exerting an influence over Tonbridge & Malling Borough in the TMBC SHMA. Please see response to question 4 (above)."

In relation to Rochester Airport, Tonbridge and Malling Borough Council and Medway Council have undertaken cross boundary project work together for the future of this site which falls within both administrative areas. This collaborative work does not appear to have been acknowledged within the current consultation document. We would welcome reference to this work as part of the Duty to Cooperate.

We would like to draw to your attention to the following evidence that TMBC have recently published, which may provide useful background information as well as data for helping to assess *in combination* impacts:

- Air Quality Assessment (June 2018)
- Transport Assessment (June 2018)
- We have also commissioned some additional work to model the proposed mitigation measures set out in our Transport Assessment, and the impacts these may have on the highway network. Once complete, this will be made available via our website.

We are mindful of the recent publication by the Office for National Statistics of the 2016-based Sub-National Population Projections. You may wish to consider the implications of this dataset and the 2016-based Household Projections that will follow in September for your Objectively Assessed Need.

We look forward to continue working together as our respective Local Plans progress and are happy to engage in work on Statements of Common Ground with Medway Council, as necessary.

Yours sincerely

Jenny Knowles
Senior Planning Officer (Policy)
Direct line: 01732 876273

From: [REDACTED]
Sent: 21 June 2018 14:16
To: futuremedway
Subject: Future Medway Local Plan - consultation response - Development Strategy document

Categories: Blue Category

Hi.

I have decided not to try to answer each question online as this is impossible without knowledge of some quite specialist areas. I also doubt if much could be said at this stage in the process that would actually alter the proposed Local Plan in any significant way. I think that the Council has probably already decided what it intends to do.

My fundamental issue is that I do not believe the 30,000 plus homes being planned for should be constructed in Medway at this time.

We do require homes to be built for those currently living in Medway who want or need them. However, too often in recent years those that have been built are unsuitable/unaffordable for local people. This has resulted in areas like Strood becoming a commuter town for London or elsewhere outside of Medway, with a sense of a distinct community being lost. We cannot go on increasing the number who live here without vastly improving the existing infrastructure and services. I would like to see the many problems that exist in Medway (such as air pollution, underfunded schools, traffic congestion, dying High Streets, lengthy hospital/GP waiting lists etc.) fixed before we look to add yet more people and vehicles to the mix.

I do realise that life is not as simple as that and that constraints are placed on the local authority by both the current administration and central government and their obsession with 'economic growth' at any cost.

However I would like to take the opportunity provided by the consultation to make a few points in relation to the proposed Local Plan.

1. I am disappointed that the Council have moved away somewhat from Option 1 previously outlined at the 'Development Options' stage of the Local Plan consultation. This sought to make the best use of brownfield land, building good quality homes at higher densities near town centres and close to travel hubs. Instead the main focus now seems to be to build a new 'town' at or near Hoo, with or without development at nearby Lodge Hill (and presumably Deangate Ridge too now).

I personally oppose any significant urban expansion, especially onto any quality agricultural land. For example recent studies have shown an alarming decrease in wildlife and insects in the UK and this is in part due to loss of habitat through expanding urban areas. We must learn to live with nature, not to regard the presence of animals, birds, trees and green spaces as an inconvenience to be brushed aside.

There should definitely be no development that threatens the Site of Special Scientific Interest at Lodge Hill or any pockets of ancient woodland there or elsewhere in Medway. These sites are protected and valuable for good reason. I wish politicians would realise the value of these sites, one that cannot be measured in purely financial terms. I think the Council should take a more

responsible attitude, be bold and rule out all development around officially protected sites, farmland, woodland, open spaces and areas of special biodiversity.

2. What should not be allowed to happen is the development of large estates of car-dependent expensive 'executive' housing on the outskirts of the Medway Towns, with no affordable and reliable public transport links. There should be a firm commitment to all developments being of low-carbon, truly sustainable, energy efficient design with the aim to eventually achieve zero-carbon housing. We need to break the pattern of development I have seen over the last few years in places like Medway Gate or at Wainscott where identikit houses are crammed in with little investment in community facilities. The idea of the new rail link onto the Peninsula is interesting, but without providing a connection on to Strood and the other Medway Towns it would be of very limited use. Development should be Council-led, not developer-led.

There should be support given to alternatives to the traditional large housebuilding firms. These could include for example Community Housing Trusts, eco-home builders and companies specialising in affordable off-site built housing. There are wonderful companies out there doing wonderful things with architecture – it would be great to see some of these coming to Medway to give us the benefit of their innovative, ecological designs.

3. I get little sense of environmental responsibility or leadership from the Plan. While the right noises are made in the document about caring for the natural environment, there seems to be little in the way of firm commitment to taking positive action to do this. In fact, things such as the possible destruction of areas of the SSSI at Lodge Hill, enthusiasm for the proposed Lower Thames crossing, continuing attempts to increase activity at Rochester Airport and the willingness to blur the boundary between urban and countryside in areas all around Medway show a distinct lack of commitment from Medway Council to protecting our environment.

I want the Council to give a firm commitment within the Plan to protecting our countryside from development, to creating new managed green spaces and to 'greening' the urban area. I would also like to see the Council lead a movement away from car dependency within Medway and provide meaningful investment in local public transport. Most importantly, the issue of air pollution must be tackled urgently.

I look forward to seeing the draft Plan later this year.

Best regards

Steve Dyke



From: [REDACTED]
Sent: 21 June 2018 15:23
To: futuremedway
Cc: [REDACTED]
Subject: Future Medway Local Plan comments (Paramount)

Categories: Blue Category

Dear Medway Council,

The purpose of this email is to provide feedback on Medway Council's emerging Local Plan.

Paramount Independent Property Services LLP provide temporary accommodation to local authorities in Kent, including extensively to Medway Council. We have an excellent relationship with the council's Housing Department, and look forward to developing this further.

Paramount only wish to respond on the part of the emerging Local Plan that discusses Houses of Multiple Occupation (HMOs). This is described in para 4.44 - 4.45, and the associated policy H8.

Question H11:

Do you agree with the policy approach for HMOs?

Paramount believe that well managed and designed HMOs are a crucial component of Medway's local housing offer. Wider ongoing increasing housing affordability pressures and changes to the Universal Credit (Housing Benefit) mean that the demand for well managed HMOs will increase, and the emerging Local Plan should recognise this and seek to promote adequate future provision.

Question H12:

Do you consider that the council should set locational criteria for HMOs, such as consideration neighbouring uses and proximity to other HMOs?

No. Paramount have extensive operational experience of operating HMOs, and neighbouring uses and proximity to other HMOs can be controlled through the provision of excellent management services. Not all landlords should be "tarred by the same brush" in terms of the sensitivities described. Any problematic issues should be resolved through relevant enforcement action by the local authority, rather than set by additional planning controls.

Question H13:

Should the council make use of Article 4 Directions to restrict the ability to convert properties to HMOs?

No. As stated in the answer to question H11, Paramount believe that well managed and designed HMOs are a crucial component of Medway's housing offer. Wider increasing housing affordability pressures and changes to the Universal Credit (Housing Benefit) mean that the demand for well managed HMOs will increase, and the emerging Local Plan should recognise this and seek to promote adequate future provision. The implementation of Article 4 for this purpose would run counter to the increase demand for this part of the housing market. Paramount would suggest that the increased enforcement action against HMOs that are poorly managed is a more sustainable course of action, as opposed to simply looking to restrict supply.

Kind Regards,

Chris Knowles

Strategic Service Manager

Paramount Independent Property Services LLP

T: [REDACTED]

[REDACTED]

Visit us at: www.pips-localauthority.co.uk



We are the South East's largest specialist temporary accommodation provider. We are a Kent based business with a successful track record providing properties that range from shared accommodation to four bedroom family homes.

This e-mail is sent on behalf of Paramount Independent Property Services, a limited liability partnership registered in England under registered number OC395930. Our office is Affinity House, Beaufort court, Rochester, Kent, ME2 4FD.

maryott, kyle

From: [REDACTED]
Sent: 21 June 2018 14:51
To: futuremedway
Subject: Consultation response to planned houses in Hoo St Werburgh

Categories: Blue Category

Dear Planning Team

I am writing to highlight my concerns over the planned houses in Hoo St Werburgh.

My concerns centre around the strain that this will have on the existing village. Already the surgeries are struggling to offer enough appointments to those currently living in the area. The road system is poor and limiting, not least when they close roads for weeks at a time, but also since there is effectively only one main route on and off the peninsula, which does mean that if there are any accidents this can have a massive impact on traffic and people getting to their destinations.

My mother currently lives with us and has regular carers during the day. When Bells Lane was closed this meant that many of her calls were late which has an impact on when she gets fed. I know her situation is not the only one in a village with an aging population.

There are currently shops in the village that are not in use and have not been for a number of years – the school is over subscribed and although I know there are plans for a new all through school, this will only add to the traffic issues in the morning with the numbers getting off the peninsula to do the 'school run'.

Please re-consider the amount of houses planned to be built in the Hoo St Werburgh area, or at least demonstrate plans that will mean the existing villagers benefit by doubling the population. I.e. More services, more shops, better road infrastructure, quick responses with repairs to roads/gas pipes etc, support for local surgeries to get Doctors to the peninsula to ensure effective healthcare for those unable to travel to Gillingham, a walk in clinic, more services for the youth of the village....if you insist on doubling the population and allowing fat cats to financially benefit at the expense of those already in the village at least do something about what is already here and add to it to ensure that the additional population can be catered for properly.

Kind regards

Elizabeth Kemp
Teacher at Hundred of Hoo School
Resident
[REDACTED]

Sent from [Mail](#) for Windows 10

Response to Medway Local Plan Development Strategy Consultation Document

Medway's consultation

- 01 Thank you for giving us this opportunity to comment on Medway Council's consultation on its Local Plan Development Strategy. With both Authorities out to consultation at the same time, albeit at different stages, there is an opportunity through the duty to co-operate mechanism to tackle common issues.
- 02 Medway Council are working towards six key milestones to successfully adopt a new Local Plan for Medway. There are:
- 1) Issues and options
 - 2) Development options
 - 3) Development strategy**
 - 4) Publication of draft plan
 - 5) Submission for independent examination
 - 6) Adoption
- 03 Medway started its Local Plan development strategy consultation on 16 March and comments have to be submitted in writing by 12pm on Monday 25 June 2018. This is the third milestone and a key stage as they pull together all the components for the plan that they intend to publish and then submit.
- 04 There are four scenarios:

	Locational split			Summary		Total given for scenario
	Urban sites:	Hoo Peninsula:	Suburban sites:	New Sites	Existing Pipeline	
Scenario 1	12,775 homes	9,318 homes	4,528 homes	16,500	13,500	30,000
Scenario 2: Investment in infrastructure to unlock growth	12,775 homes	11,750 homes	3,179 homes	17,500	13,500	31,000
Scenario 3: Meeting government's target of local housing need of 37,000 homes	14,194 homes	12,162 homes	6,276 homes	22,500	13,500	36,000
Scenario 4: Consideration of development within Lodge Hill SSSI	12,775 homes	10,357 homes	4,108 homes	17,000	13,500	30,500

Duty to Co-operate

- 05 The consultation document acknowledges that Gravesham and Medway share a housing market area. It notes that the Localism Act, 2011, places a legal duty on local planning authorities to cooperate in relation to strategic matters. It explains that Medway Council will engage with Gravesham Borough Council on their respective plans through the Duty to Cooperate and prepare a Statement of Common Ground to address cross-boundary development issues, including the supply of housing land.
- 06 Through the duty to co-operate, engagement to date on the supply of housing land has focused upon the need for Gravesham Council to demonstrate that it is unable to make sufficient provision to meet its own housing needs before Medway Council will consider accommodating any of Gravesham's unfulfilled needs. Gravesham considered that this position by Medway was entirely reasonable. Whilst residents and businesses generally accept a local need for housing, meeting the needs for other local authorities can be much harder to accept and so the considerations need to be transparent. However, circumstances are now changing due to proposed alterations to national policy, and so a slightly different approach to the duty to cooperate is likely to be required in the future. Three points in particular are of note.
- 07 Firstly in April, 2018, Gravesham Council published a document entitled "Site Allocations: Issues and Options" as part of its Regulation 18 Local Plan consultation. This identified that additional sites would need to be found for approximately 2,000 dwellings during the plan period up to 2028. It recognised that if Gravesham's housing needs are to be fully met within the Borough, it is likely that land for development would need to be released within the Green Belt. The actual amount, and potential location(s), is yet to be determined.
- 08 Secondly, the timetables for the preparation and adoption of the respective local plans are not in synchronisation. Medway aims to publish a draft plan in late 2018, with Submission for Examination in March 2019, and adoption in 2020. Gravesham is aiming for a second round of Regulation 18 consultation in 2019 and Submission in 2020. Consequently, the Medway Local Plan could be adopted before the housing supply position is confirmed in Gravesham. This would mean that the Medway Local Plan would have gone through the plan making process without considering the issues of meeting some of Gravesham's housing requirements.
- 09 Thirdly, the process of considering a neighbouring authority's request to meet some of its housing demand is changing as a result of proposed alterations to the NPPF. Given that the Government is proposing to adopt the revised NPPF in the summer of 2018, Gravesham Council considers that it should be taken into account in the preparation of both the Gravesham and Medway Local Plans.
- 10 The proposed amendments to the NPPF state that in future, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, plan making authorities should have fully examined all other reasonable options for meeting their identified need for development. Those options include whether the strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. This means that Gravesham cannot identify any land within the Green Belt for development (and hence whether there are any special

circumstances to justify amendments to the Green Belt boundary) before Medway has considered whether it could accommodate some of Gravesham's identified need. As stated above, that need amounts to 2,000 dwellings.

- 11 Consequently, the current approach to the duty to co-operate, referred to above, is likely to be overtaken. There will be no longer any requirement for Gravesham to identify the balance of unmet need for Medway to consider. Indeed, it is not allowed to do so. It is a matter for Medway to look at its overall housing land provision and to determine whether any of it can be allocated to meet some or all of Gravesham's needs.
- 12 As a result, there is no reason why that consideration by Medway cannot be undertaken immediately and the results taken into account in the Draft Plan to be published in late 2018. Gravesham Council therefore requests that both Councils immediately embark on the preparation of a Statement of Common Ground under the duty to co-operate, in order that it is completed and its results taken into account before the publication of Medway's Draft Plan later this year.
- 13 The consultation document notes that Gravesham Council has sought flexibility within the Medway Plan to meet the wider housing market area's needs, should excess residential land be identified during the plan preparation process. This remains Gravesham's position and the following paragraphs demonstrate that excess residential land has been identified by Medway Council.
- 14 Three of Medway's four scenarios identify a surplus of sites over the SHENA Objectively Assessed Housing Need. This could make a contribution to meeting some of Gravesham's housing need without having to identify additional sites. The surpluses are as follows:
 - Scenario 1 +487;
 - Scenario 2 +1,570;
 - Scenario 4 +1,106
- 15 Scenario 4 acknowledges that the Lodge Hill proposal for 2,000 dwellings would be part of a wider strategic development of the Hoo rural town. However, it is only combined with scenario 1. It would be logical to combine Lodge Hill with scenarios 2 and 3 as well, given that they also include the proposed Hoo rural town. If scenario 1 included Lodge Hill without removing land at Capstone Valley and Lower Stoke, the surplus would rise by 2,000 to a total of 2,487, the surplus for scenario 2 would rise to 3,570 and the current deficit of 1,182 in scenario 3, could be changed to a surplus of 818 dwellings.
- 16 The surpluses are identified in the consultation document as "buffers to allow for flexibility in the strategy". This can be interpreted in two ways. It could allow for replacement sites for those which do not come forward as expected. Alternatively, flexibility in the strategy could mean an integrated strategy which includes a contribution to meeting some of Gravesham's housing need. Gravesham Council would support the latter interpretation but also considers that the plan could accommodate both interpretations.

- 17 If the surplus land were to be earmarked under the duty to cooperate to meet some of Gravesham's development needs, additional sites could be identified on a contingency basis should any of the identified sites fail to materialise. This is because each option excludes sites which have been identified as potential allocations, as follows:
- Scenario 1 excludes land to the east of Rainham and at Lodge Hill;
 - Scenario 2 excludes land at Lodge Hill, Capstone Valley, east of Rainham and north of Rainham;
 - Scenario 3 excludes land at Lodge Hill: and
 - Scenario 4 excludes land to the east of Rainham and part of the Capstone Valley
- 18 When the Development Strategy was considered by Medway's Cabinet on 16th March, 2018, the report contained a map for each scenario which identified the sites to be included in them. The Key listed them as Potential Site Allocations. Taking Scenario 2 as an example, sites were excluded at Rainham and Capstone Valley which had been included as potential allocations in other scenarios. According to the Strategic Land Availability Assessment of 2017, these sites comprised a total of 116 hectares (rounded).
- 19 Consequently, there are three sources of land which could make a significant contribution to meeting some of Gravesham's housing need: surpluses already identified in three of the scenarios; the additional provision of 2,000 dwellings to each of those scenarios by the inclusion of Lodge Hill; and land identified as potential site allocations at Capstone Valley and Rainham. Sufficient land could also be identified to provide a "buffer" if required.
- 20 A further scenario is proposed below by Gravesham Council, which would also have sufficient capacity to make a contribution to meeting Gravesham's housing need.

Other Comments

- 21 **Transport** – Any development (with employment) on the scale being talked about in the consultation document will naturally give rise to significant questions about the impact on transport networks (road and rail) in North Kent. In particular development on the Hoo Peninsula will feed trips onto the highway and rail networks that pass through Gravesham with potential significant implications. The Council is aware that Medway has ongoing technical work in this area, and that one of the key issues will be the modal split that can be achieved, hence for example the HIF bid for the Isle of Grain Branch.
- 22 Another key study in this will be the results of the transport modelling work currently being undertaken by Highways England for the Lower Thames Crossing.
- 23 **Employment** – it is important that the scale of housing provision and provision of jobs in the vicinity is matched give the potential implications for the transport network if significant additional long distance trips need to be catered for.
- 24 **Vision** - Whilst the proposed town at Hoo St Werburgh has been included in all the scenarios, it is surprising that it has not been included in the Vision.

- 25 **Lodge Hill** - Given that the town at Hoo is a component of all the scenarios, it is surprising that Lodge Hill has been excluded from all but one of those scenarios. Given its close proximity to Hoo and Chattenden, it should logically be considered as an integral part of the Hoo town concept.
- 26 **Buffer Sites** - The levels of the “buffer” for each scenario appear to be entirely random with no evidence cited to justify such an allowance. If, for example, a buffer of 487 is appropriate for scenario 1, why would it not also apply to scenarios 2 and 4, given that the overall housing need is the same for each scenario?
- 27 **Meeting the Government’s Housing Need Target** - Having decided to include scenario 3, Meeting the Government’s Proposed Calculation of Local Housing Need, the scenario fails to meet the required level of growth, showing a shortfall of 1,182 dwellings. The scenario should have included sufficient sites to meet the full need and the implications of doing so should have been explored.
- 28 If Lodge Hill is included in the scenario, the Government’s housing need target would have been met. If Lodge Hill is not viable, either alternative sites would need to be found but if this approach is explored and found wanting, Medway Council might need to conclude that the 37,143 dwellings cannot be provided by 2035.
- 29 The consultation document states that this level of housing need (37,143 homes) is incredibly challenging and would require a radical change in how development is delivered. However, it does not put forward any indication of what might constitute such a radical change. One possibility might be a Hoo town brought forward by a Development Corporation. As part of this, the optimal settlement size for such a delivery mechanism would be considered and the possibility of development continuing beyond 2035.
- 30 Alternatively, Medway Council could look again at the revised local housing need given that the 2035 figure in scenario 3 is not, in fact, entirely the Government’s calculation as the standard methodology currently only provides data for 2016-2026. Medway’s calculation has projected forward the Government’s annual OAN to 2025 and Gravehsam suggests for a number of reasons, carrying forward this annual requirement up to 2035 can be challenged.
- 31 It appears that Medway has not simply applied the Government’s annual housing need figure of 1,665 dwellings to the 23 year local plan period as this would have resulted in a total of 38,295 dwellings instead of the 37,143 that has been adopted. Instead, it appears to have allowed for the SHENA figure of 1,281 dwellings per annum from 2012 to 2015 and 1,665 per annum from 2016 to 2035.
- 32 It is suggested that Medway should consider a further scenario which only applies the Government’s annual requirement from 2016 to 2026 and applies the SHENA requirement for the remainder of the plan period. The reasons for doing so are set out as follows:
- The Government has only identified an annual housing need for each local authority up to 2026. The need post 2026 has not been calculated by the Government;
 - The SHENA has identified housing needs up to 2035;

- New ONS 2016 based population projections published in late May suggest an increase of 40,500 persons for 2016-2035 compared with 51,000 from the 2014 based;
 - Medway Council has concerns with the Government's methodology and its application given that Medway is comparatively, one of the most affordable areas in the South East;
 - The rate of annual growth in Medway's population has slowed in recent years from the peaks shown between 2012 and 2014. Rates of growth in 2016, were under 60% of the level seen in 2012.
 - Migration trends have been very volatile in recent years. There is also some uncertainty on assumptions informing national projections of migration, particularly after the UK exits the European Union;
 - Mid-year population estimates are published annually and household projections are produced every two years. Consequently, data is continually changing and will do so many times up to 2035. This raises the possibility that housing need projections over such a long period could become substantially out of date;
 - The Medway Local Plan is programmed for adoption in 2020. The draft NPPF requires local plans to be reviewed within 5 years of adoption. Consequently, there is sufficient time available to amend the post-2026 housing requirement, if necessary, based on updated information and updated Government calculations based on the standard methodology;
 - The Government has not yet published its response to the consultation on the standard method;
 - The Government's advice that local planning authorities use the standard method where emerging plans have not yet been submitted for Examination before Spring 2018, would still have been followed for the period up to 2026, to which the Government's figures apply.
- 33 It is therefore proposed that Medway Council consider a fifth scenario, based upon a housing need of 1,281 dwellings per annum from 2012 to 2015, 1,665 dwellings per annum from 2016 to 2026 and 1,281 dwellings per annum from 2027 to 2035, giving an overall requirement of 33, 687 dwellings. The post 2026 figures would be the subject of a post adoption local plan review.
- 34 If the same sites were to be included as in scenario 3, excluding Lodge Hill, a supply of 35,961 dwellings would meet the 33,687 requirement with a surplus of 2,274. This would increase to 4,274 if Lodge Hill came forward.

Green Belt

- 35 The Development Strategy Consultation booklet appears to suggest by the wording (page 2) "... and by our important environmental assets. Our Special Protection Areas, Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty and Green Belt bring both environmental advantages and constraints" that Green Belt is an environmental constraint. Green Belt is a spatial/social policy constraint.

- 36 The Consultation booklet advises that (page 5) that “we will continue to resist inappropriate development in the Green Belt to the west of the Medway”. This is also Gravesham Borough Council’s approach, but we do need to flag that our April 2018 consultation includes an option to develop land to the west of Strood. Depending on the outcome of duty to co-operate discussions and our Member decisions on growth, this could, in due course, be selected as an area of growth which would require safeguarding or allocation.

Conclusion

- 37 In summary the Borough Council:
- welcomes the consultation and ongoing duty to co-operate discussions on issues of mutual interest;
 - finds that the logic of the scenario’s is not always clear but there does appear to be scope to take some of Gravesham’s housing requirement;
 - identifies that there are specific series of issues in relation in particular to housing, employment, Green Belt and transport that need to be further addressed;
 - commits to discussing these in detail through the duty to co-operate process in the context of the proposed changes to the NPPF.

22 June 2018



ROBINSON ESCOTT PLANNING LLP



CHARTERED TOWN PLANNING AND DEVELOPMENT CONSULTANTS

DOWNE HOUSE, 303 HIGH STREET, ORPINGTON, KENT BR6 0NN. [REDACTED]

email: enquiries@replanning.co.uk website: www.replanning.co.uk

Mr David Harris
Head of Planning
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR

22 June 2018

Our Ref: JE/HC

By email: futuremedway@medway.gov.uk

Dear Mr Harris

FUTURE MEDWAY LOCAL PLAN DEVELOPMENT STRATEGY CONSULTATION

We act for Brookworth Homes Ltd who have an interest in land at 178 Brompton Farm Road, Strood, ME2 3RE. My clients have the following comments to make regarding the Development Strategy document.

1. The Medway Issues and Options Consultation document – January 2016 contemplated that the most sustainable approach to meeting Medway's housing needs involved the regeneration of existing urban areas, but that this was unlikely fully to meet development needs for new housing and in particular the needs of families and other wider sections of the community. It was accepted that some incremental development will be necessary around the periphery of existing built up areas in order to meet short term housing needs (i.e., within the first 5 years). Such an approach may make it necessary to review Green Belt boundaries in order to provide for a sufficient quantum of development.
2. The second Regulation 18 Development Options Consultation document in January 2017 again incorporated a suburban expansion scenario whereby sustainable urban extensions around Rainham, Capstone and Strood would complement the urban regeneration programme. The proposed release of Green Belt land to the west of Strood was included, to consider whether such a significant policy change may be necessary or justified.
3. These development options were consulted on in the context of an OAN of 29,463 homes over the plan period. Whilst there is still uncertainty as to the OAN for Medway going forward, the current development strategy consultation projects

housing need on the basis of 29,463 new homes over the plan period, but acknowledges that this may rise to 37,143 homes.

4. It follows, therefore, that the development strategy as now proposed will still need to blend those factors and scenarios considered necessary in earlier consultations and, indeed, may necessitate further land being allocated unless there is a fundamentally new strategy. Yet the current development strategy still proposes urban regeneration and a new rural settlement at Hoo, but now states that it is not considered that exceptional circumstances exist to justify the review of the Green Belt boundary to accommodate development.
5. The difference in terms of the projected components of supply appears to be a greater focus on the new rural town centred on Hoo St Werburgh and a reworked proposal for development at Lodge Hill/Chattenden. Whilst these strategic proposals may or may not come forward in the longer term, particularly having regard to the history of Lodge Hill, they give little or no certainty as to the ability of the Council to meet its shorter term housing needs. Given the current significant shortfall in the 5 year supply, there undoubtedly still remains a need for sites to be allocated around the periphery of existing built up areas as the original Issues and Options document accepted, to meet short term needs.
6. Such need becomes even more acute should the OAN for Medway be set at 37,143 new homes for the plan period.
7. The development strategy, therefore, needs to translate meeting the shorter term housing need into a greater number of proposed housing allocations in locations identified as being capable of delivering new homes within the period. This undoubtedly will require a full Green Belt review to be undertaken as was contemplated in the second Development Options consultation.
8. Paragraph 7.27 of the current document notes that the Green Belt designation in Medway functions to retain a strategic gap between Strood and Gravesend and prevent the coalescence of Strood and Higham. The existing A289 Bypass provides a sound and defensible Green Belt boundary that would endure into the longer term and would provide an effective limit to the further expansion of Strood whilst still preserving a strategic gap between Strood, Higham and Gravesend. Infilling of the land between the existing built up area in Brompton Farm Road and the A289 would provide significant additional new housing development that is sustainable and deliverable within 5 years.
9. In relation to question NE6, therefore, it is submitted that there are exceptional circumstances to justify the review of the Green Belt boundary in the Strood area and that infilling of the land between the existing built up area of Strood and the A289, coupled with a revised Green Belt boundary along the line of the A289 would not prejudice the strategic purpose of the Green Belt in this area.



Yours sincerely



John Escott
ROBINSON ESCOTT PLANNING LLP



GL Hearn

Part of Capita Real Estate

Medway Council Local Plan

Representations on behalf of British Airways Pension Trustees Limited

Hempstead Valley District Centre
Gillingham
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22nd June 2018

Prepared by

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Quality Standards Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

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DATE	ORIGINATORS	APPROVED
22/06/2018	Richard Robeson Senior Planner	Nick Diment Development Planning Director

Limitations

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1 PREAMBLE

- 1.1 This report has been produced by GL Hearn on behalf of British Airways Pension Trustees Limited (hereafter “the owners”), the owners of Hempstead Valley District Centre and forms their response to Medway Council’s emerging Medway Local Plan (2012-2035). Those representations and recommendations contained within this report have been submitted on behalf of the owners in their capacity as investors and managers of the Hempstead Valley District Centre (“HVDC”). Representations have previously been submitted on behalf of the owners in response to Medway Council’s consultation(s) on the Draft Core Strategy (2011).
- 1.2 As you may be aware the current owners have invested in the centre over a number of years and are long-term investors in property. The existing HVDC reflects the owners’ commitment to, and investment in, Hempstead Valley, indeed the HVDC is a popular, sustainable and well managed allocated District Centre which is highly regarded by the local population it serves.
- 1.3 The owners’ ongoing commitment to the HVDC is evident in the recent expansion and enhancement of the retail and leisure provision within the district centre. This illustrates the owners’ continuing commitment to Medway’s local economy, as well as the enduring need to invest in the HVDC in the light of changing retail patterns and competition from other centres outside of the borough, notwithstanding the extremely challenging market conditions for retail development in the UK that persist.
- 1.4 As reflected through the ongoing investment and improvements at the HVDC, the owners remain committed to maintaining and improving the retail and leisure offer within Medway and ensuring that it continues to perform its district centre role in the retail hierarchy. They therefore welcome the Council’s preparation of the emerging Medway Local Plan, and the opportunity to engage in its preparation at this early stage.
- 1.5 Those policies and objectives contained within the emerging Medway Local Plan will ensure that Medway Council are able to plan positively and proactively to meet the development needs of the borough over the plan period. Consequently, the accurate identification of those development needs in the borough over the plan period is critical if the emerging Medway Local Plan is to successfully manage the future development of the borough. Therefore, the strength and robustness of the evidence base in identifying the development needs (including retail and leisure), is fundamental in the preparation of the emerging Medway Local Plan.
- 1.6 The Medway Local Plan Regulation 18 Consultation (“Consultation Document”) sets out intended policies.

- 1.7 Following Medway's consideration of the responses to the Issues and Options consultation in January 2016, the Consultation Document forms the third round of consultation that will inform the production of the Local Plan.
- 1.8 The final stage of consultation will follow consideration of the responses to the Consultation Document, and will need to consider whether the Local Plan, as drafted, is "*sound*" in relation to the requirements of Paragraph 182 of the National Planning Policy Framework ("NPPF").
- 1.9 Consequently, the draft policies considered within the Consultation Document must reflect those overarching objectives and policies of the NPPF in order to be considered "*sound*" at submission and Examination stage.
- 1.10 Therefore, in accordance with the provisions of the NPPF, the Consultation Document should be based upon an up-to-date evidence base that identifies development needs within the borough over the plan period, and plan proactively to meet these needs in full. A review of the Council's evidence base is contained within Appendix A of this response.
- 1.11 The Consultation Document should therefore seek to identify the most appropriate policy approaches to meet this need, including the identification of locations for future development to support sustainable growth in Medway.
- 1.12 In addition, the diversification of HVDC away from a mainly retail (A1) offer to introduce more alternative "*town centre*" uses is a key aspiration of the owners. In making these representations, we have considered whether the policies, as drafted, include sufficient flexibility, as encouraged in the NPPF, to allow a greater mix of appropriate uses to be introduced into the centre, subject to planning.
- 1.13 The representations and recommendations provided within this report therefore reflect the owners' key observations with regards to the development needs, in particular retail and leisure need, and the Council's preliminary objectives for the future development of the borough to positively and proactively meet this need. Given the owners' interest in the HVDC, the representation and recommendations provided in this report are focused on the identification of retail and leisure needs, and the emerging strategy to meet these needs as set out in the '*Retail and town centres*' chapter of the Consultation Document.

2 HEMPSTEAD VALLEY DISTRICT CENTRE

- 2.1 On behalf of the owners, we have submitted these representations to the Consultation Document in their capacity as investors in the Hempstead Valley District Centre ("HVDC").
- 2.2 The HVDC is situated to the south of Hempstead and lies within the administrative boundary of Medway Council. The existing HVDC is located between Hempstead Valley Drive (west) and Sharsted Way (east), and encompasses the purpose-built indoor shopping centre, associated petrol filling station and access roads and surface level car parks.
- 2.3 Since opening in 1979, the HVDC has undergone a number of renovations and extensions, including recent expansion of, and improvements to, the leisure uses within the HVDC. Recent improvements to the HVDC further enhance the traditional comparison and convenience retail offer provided within the centre, supplementing the existing retail offer with complementary restaurants.
- 2.4 The existing HVDC provides for approx. 79 retail units, including two anchor stores (Sainsbury's and Marks & Spencer) as well as a range of national multiple retailers including Argos, Boots, and Clarks, this represents approx. 44,749sq.m. Planning permission has recently been granted for 5x additional units (A1 and A1/D2) on the existing surface-level car park. On the basis of the high quality retail and leisure offer provided, the HVDC continues to function as a district centre and represents popular destination for consumers and retailers alike.
- 2.5 The HVDC represents one of the key retail destinations within the borough, making a significant contribution towards meeting demand for comparison and convenience retail and leisure floor space within the borough. Indeed, whilst those other centres within the borough struggle to maintain market share, with consumers choosing to shop outside of the borough, the HVDC attracts visitors from outside the borough.
- 2.6 Responding to the continued success of the HVDC, the existing Medway Local Plan acknowledges the important role of the HVDC in the retail and leisure provision of the borough, identifying the HVDC as a 'District Centre' within the hierarchy of retail centres.
- 2.7 Given the changing economic context surrounding retail in the UK, and the desire to create a more diverse and sustainable centre, the owners are currently seeking to increase the range of town centre uses within the centre and introduce more community and leisure uses as aside from the traditional retail and (more limited) restaurant, offer.
- 2.8 As a 'District Centre' the HVDC is considered second only to Chatham Town Centre which is the principle 'Town Centre' within the borough. The Proposals Map which accompanies the existing Medway Local Plan (2003) identifies the HVDC 'District Centre' allocation as covering the full extent

of the existing centre and associated surface level car parks. The existing allocation therefore includes those 'free standing' units located within the wider HVDC site.

3 RETAIL, & TOWN CENTRES

Policy RTC1 - Retail Hierarchy

- 3.1 The NPPF requires local planning authorities when “*drawing up local plan*” to “*define a network of town centres*” (para 23). The NPPF paragraph 23 (bullets 2 and 4) requires that when drawing up local plans, they:
- “*define a network and hierarchy of centres that is resilient to anticipated future economic changes, and;*
 - *promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres*”.
- 3.2 Given the deficiencies identified in the supporting evidence base (Appendix A); we have concerns as to the justification of the hierarchy detailed pursuant to **Draft Policy RTC1**. We consider that it is challenging for the Council to define a hierarchy of centres, and allocate growth accordingly, given that there is no objective understanding of need and capacity.
- 3.3 Notwithstanding this, we welcome the recognition within the hierarchy (at **RTC1 II.**) that HVDC is defined as a District Centre. On this basis, we agree with the identification of the district centres in relation to **Question RTC3**.
- 3.4 In terms of **Questions RTC1, RTC2, RTC4 and RTC5**, we agree that the hierarchy provides an effective approach; and do not suggest any alternative approaches. However, specific to **Question RTC2** (i.e. the primacy of Chatham), and the **Draft Policy RTC1** more generally, the policy cannot be considered as justified and thus “*sound*” unless justified as realistic and deliverable against an up-to-date evidence base. Given our concerns as to the existing evidence base, **Draft Policy RTC1** remains unsound as it is not justified, unless and until it is supported by an up-to-date retail evidence base..

Policy RTC2: Sequential Assessment

- 3.5 While, as noted, the NPPF requires local planning authorities when “*drawing up local plan*” to “*define a network of town centres*” (para 23), the NPPF does not tie the operation of the sequential test (at paragraph 24) to the designation of a retail hierarchy when considering planning applications.
- 3.6 In fact, the NPPF explains, at Paragraph 24, that Councils, in operating a sequential test, should “*require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered*”.

- 3.7 The NPPF confirms, in the Glossary, that “town centres” in the above context includes all of the following:
- “References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance.”*
- 3.8 It is understood that the Council seeks to justify this alternative approach to the sequential test on the basis of the *Retail and Commercial Leisure Assessment - Part 2* (March 2018) (“RCLA2”). This document, which forms part of the Council’s evidence base and is considered as Appendix A, considers that such an approach is required in order to “protect other centres” (RCLA2, para 4.17).
- 3.9 In explanation of this approach, the RCLA2 notes (paras 4.18 and 4.19) an example of the treatment of the Willows district centre in the Torbay Local Plan (2015). However, while the Torbay Local Plan is indeed post-NPPF, the Inspector’s Report (12th October 2015) did not specifically consider retail policy or the context of the Willows.
- 3.10 As explained within Appendix A, we consider that this not provide a robust and objectively-assessed base to inform the direction of development management policy, including this alternative approach to sequential testing that would normally be at variance to the NPPF.
- 3.11 Accordingly, **Draft Policy RTC2**, as worded, in seeking to afford Chatham Town Centre and selected other centres additional protection compared to other Town Centres in terms of retailing, is not in accordance with the NPPF.
- 3.12 In fact, given that the draft policy seeks a preference for town centre uses in other centres in preference to HVDC, the wording would militate against the intended diversification of HVDC to include other “town centre” uses, subject to planning, as part of the longer-term aspiration to diversify the offer away from one of mainly retail (A1).
- 3.13 Thus, as a Town Centre, and notwithstanding the retail hierarchy, Hempstead Valley District Centre, and indeed all other Town Centres in Medway, must be considered on the same basis as Chatham in operation of the sequential test. Draft Policy RTC2 should therefore simply draw a distinction between proposals located:
- In a Town Centre;
 - Edge of Centre (with a preference for whichever is accessible and better connected to a Town Centre); and then
 - Out of Centre (with a preference for whichever is accessible and better connected to a Town Centre).
- 3.14 Unless **Draft Policy RTC2** is re-worded on the above basis, it will not be in conformity with the NPPF, and will thus be unsound. Given that the policy fails to draw the distinction properly between in-centre, edge-of centre and out-of-centre proposals it fails to protect the role of Town Centres in

line with the 'town centre first approach adopted by the NPPF, and is thus ineffective and unsound on this basis also.

3.15 Accordingly, in response to the Consultation Document's **Question RTC6**:

- The proposed policy, as worded, does not represent an effective approach for securing and strengthening Town Centres as it does not effectively protect and secure investment in all Town Centres as against Edge of Centre and Out of Centre locations and is thus unsound;
- We consider the sequential approach, is, as drafted, not in conformity with the NPPF and thus unsound; and
- An effective sequential approach that discriminates between proposals that are in Town Centres and those that are Edge of Centre and Out of Centre should be adopted to be both effective and in conformity with the NPPF.

3.16 If **Draft Policy RTC2** were re-worded on the above basis it would become effective and in conformity with the NPPF. Subject to **RTC2** being additionally supported by a robust evidence base, it could also become justified and thus, sound.

Policy RP3 – Impact Assessments

3.17 We consider that **Draft Policy RP3** is sound; subject to the policy considerations in terms of vitality and viability of existing centres being effectively justified by an effective retail evidence base (see Appendix A).

3.18 Therefore, in response to **Questions RTC7, RT8 and RTC8**, we consider that:

- The draft policy represents an effective approach for securing and strengthening Town Centres;
- We agree with the proposed approach to impact assessments;
- We agree with the 2,500 sqm size threshold submitted; but
- An up-to-date retail evidence base is required to support the assumptions underlining the vitality, viability and health of respective centres.

3.19 We conclude that **Draft Policy RP3** can be made sound if justified by an effective retail evidence base, in compliance with the NPPF.

Policy RTC4 - Frontages

3.20 This policy seeks to control the design of frontages within defined centres in Medway. As such, it requires that frontages should :

- Provide an active frontage at ground floor level;
- Be of a scale, format and character reflecting the upper levels;
- Protect and where possible enhance the public realm;
- Demonstrate no harm to neighbouring businesses; and
- Control the design of shutters.

- 3.21 While we agree that shop frontages should be attractively designed, in accordance with the requirements of Paragraph 59 of the NPPF, we would also remind the Council that the NPPF counsels against over-prescription in this regard. Paragraph 59 explains that Council should: *“...concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”*
- 3.22 The policy as worded therefore risks lack of conformity with the NPPF in this regard, and a less prescriptive wording, which nonetheless seeks to promote active frontages, should be considered in taking this draft policy through to Regulation 19 Submission stage.

Policy RTC5 – Role, Function and Management of uses in centres - Frontage

- 3.23 The majority of the frontage within HVDC is designated as Primary Frontage under **Retail Designation 5f**. The predominantly food and beverage units that constitute the separate *“The Venue”* offer, are designated Secondary Frontage.
- 3.24 We consider that the requirements for marketing evidence pursuant to the loss of any A1 (retail) from Primary Frontages are too restrictive, and provide insufficient flexibility to allow for the introduction of other non-A1 uses into the Town Centres.
- 3.25 The inclusion of other town centre uses would add to the overall vitality and viability of Town Centres. The retail environment is changing at a rapid rate, with Town Centres continuously evolving. Customers are increasingly looking for a wider variety of experiences, and as such, there are new and retail related formats emerging which do not naturally fall into any specific use class. Specifically the retail footprint in many centres is decreasing and space is being taken up with other uses including leisure and other Town Centre uses. All of these uses can add to the vitality and viability of Town Centres. Therefore, it is important for all Medway’s Town Centres to be able to respond to these changes in a positive way.
- 3.26 As currently worded, **draft policy RTC5** remains contrary to Paragraph 14 of the NPPF, which states that *“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”*. The principle of flexibility underpins the *“presumption in favour of sustainable development”*, which is seen as the golden thread running through both plan-making and decision-taking.
- 3.27 Town Centres should be a destination which offers a variety of shopping and leisure experiences that encourage increased activity outside of normal shopping hours. Non-A1 uses, particularly in the food and beverage sector, make a positive contribution by supporting Town Centres as a primary economic driver for the sub-region by increasing footfall and dwell time within centres. The

diversification of centres also assists in attracting high quality tenants which furthers economic development and encourages continued investment in Town Centres.

- 3.28 In seeking to restrict the amount of appropriate non-A1 town centre uses in Primary Frontages the policy, as drafted, limits its effectiveness in terms of securing the future vitality and viability of Town Centres.
- 3.29 Indeed, as noted in Section 2, above, the owners are keen to introduce an element of other town centre uses, including community and leisure uses, into HVDC. This is in light of both the existing economic context surrounding retail and also a desire to diversify the offer to create a more sustainable centre. By seeking to restrict moves away from retail in a large element of HVDC the policy, as worded, serves to undermine this aspiration.
- 3.30 Therefore, in response to **Questions RTC10 to RTC13**, our response is as follows:
- **Policy RTC5**, as drafted, is ineffective and inconsistent with national policy (NPPF) and is thus unsound;
 - We do not consider that changes are required to town centre boundaries, nor the classification of Primary and Secondary Frontages as defined in figures 5a to 5f; however
 - We consider that the restriction pursuant to the protection of A1 uses in Primary Frontages should be removed.
- 3.31 Accordingly, to make **Draft Policy RTC5** sound, the restriction against non-A1 town centre uses in Primary Frontages should be removed.

Policy RTC8 – Hempstead Valley District Centre

- 3.32 As explained in this representation and the Development Options consultation HVDC continues to perform a significant role in meeting the existing retail needs of the borough, as well as providing opportunities to meet future need through expansion/reconfiguration of the existing successful District Centre. The HVDC should therefore continue to be identified as a District Centre (and thus, in accordance with the NPPF Glossary, a Town Centre) through the emerging Medway Local Plan. Despite Medway's position to date as to the role of HVDC, there is no evidence to suggest that it is performing a lesser role than Gillingham and Stroud.
- 3.33 We therefore object to the assertion within both the draft policy and the supporting text that the Hempstead Valley District Centre *"is different from other traditional centres with high streets"*, and that, by extension, policy needs to mitigate its impact by ensuring it only provides for *"local needs"* and, therefore, *"not undermine the viability of main town centres in Medway."*
- 3.34 The continuing assertion that the success enjoyed by the HVDC has arisen at the expense of the traditional centres – in particular Chatham Town Centre – fails to acknowledge either the

demonstrable interest in the HVDC shown by national and local retailers and leisure providers (including many national retailers whose only presence within the borough is at the HVDC), or the shortfalls of these “*traditional*” centres and the physical barriers to these centres meeting the objectively assessed needs.

- 3.35 Furthermore, as explained the NPPF does not provide a definition of the function or role of District Centres. Consequently the continued suggestion that the HVDC does not perform the same role as the “*traditional*” town centres that is included within the Consultation Document is contrary to the NPPF.
- 3.36 The NPPF is clear in the Glossary that Town Centres include District Centres. As HVDC is, therefore, a Town Centre, it should enjoy policy protection in accordance with the NPPF.
- 3.37 It is noted that the Council’s evidence base, through the RCLA2, promotes this approach to limiting additional retail floorspace at HVDC (see Appendix A). However, we consider, as explained in the Evidence Base section above, that this retail evidence still does not provide a robust and objectively-assessed base to inform the direction of development management policy, still less the proposed restriction on retail floorspace within a defined centre.
- 3.38 As noted, national policy (NPPF para 23) requires that, “*...needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability*”
- 3.39 Thus, by seeking to restrict Town Centre sites that could assist in meeting such needs and based on a less-than-robust understanding of current need and capacity, the Consultation Document is not only not justified and at variance with national policy, it also risks allowing surplus capacity (should it exist) to be met through Edge-of and Out-of-Centre sites, creating a less than effective policy context, and undermining the ‘town centre first’ approach.
- 3.40 In addition, In fact, given that the draft policy also seeks control additional “leisure” development at HVDC, this policy would also undermine the aspiration to diversify the centre away from mainly retail (A1) and include other “*town centre*” uses, including leisure (D2).
- 3.41 Thus, by seeking to restrict the amount of town centre uses of HVDC, which is a Town Centre, **Draft Policy RTC8** fails the NPPF tests of soundness (paragraph 182) on the following bases:
- The policy is not “*positively prepared*” as it would hamper the provision of required town centre and retail needs in a sustainable location (i.e. a town centre);
 - It is not “*justified*” as the evidence base (SHENA and RCLA2) that identifies retail needs and seeks to allocate sites to meet that capacity is not sufficiently robust;
 - It is not “*effective*” as it would limit the provision of retail and town centre development in town centres (including Hempstead Valley); and

- It is not consistent with national policy (i.e. the NPPF), which encourages town centre uses to be located in “*Main Town Centres*” which include District Centres such as Hempstead Valley.

3.42 In response to **Questions RTC20 to RTC22**, we therefore consider:

- The policy is not the appropriate approach to planning for Hempstead Valley District Centre, which is a Town Centre and should be treated as such;
- Town Centre development should not be restricted within Hempstead Valley as it is suitable for “*Main Town Centre*” uses in accordance with the NPPF; and
- Policy should support Main Town Centre uses, (as defined by the NPPF), across all Town Centres (as defined by the NPPF) in Medway.

3.43 Therefore, in order to ensure subsequent drafts (notably the Regulation 19 Submission Draft) can be considered “*sound*”, the extent of retail provision within HVDC, a defined Town Centre, should not be limited in such a manner given that there remains, to date, no effective and objectively-assessed evidence base to justify such an approach.

3.44 **Draft Policy RTC8** should be deleted accordingly to seek soundness on this basis.

4 CONCLUSIONS

- 4.1 On behalf of the owners of the Hempstead Valley District Centre, we continue to welcome the Council's preparation of the emerging Medway Local Plan and the subsequent replacement of those existing policies of the Medway Local Plan (2003). However, we retain a number of concerns regarding both the process that has been adopted by the Council in the preparation of the emerging Medway Local Plan, as well as those options for the future development of the borough that are presented within the Consultation Document. We consider that a number of the draft policies promoted would be considered "*unsound*" if taken forward to submission stage, and object to them on this basis.
- 4.2 Many of these objections are predicated on the continuing failure of the Council to provide an up-to-date and robust evidence base in support of the Consultation Document. As explained, given the absence of the identified development needs, many of the draft policies presented within the Consultation Document do not meet the objectively assessed needs in full as required under the provisions of the NPPF.
- 4.3 We also continue to express their serious concerns with the Council's proposed spatial strategy for the distribution of future retail and leisure development within the borough.
- 4.4 In particular we object to the Council's assertions, and draft policies, regarding the current and future role of the HVDC. We continue to strongly object to the Council's suggestion that the HVDC does not, and should not, perform the role of a District Centre, and proposition that the HVDC should not perform any function in meeting the future retail and leisure needs of the borough. This approach not only fails to acknowledge the significant role that the HVDC performs in meeting retail and leisure need within the borough, but also jeopardises the ability of the development needs of the borough to be met. This approach appears predicated on an insufficient evidence base, as detailed above, which results in such an approach not being properly justified. Any such approach is also considered to be contrary to those overarching objectives of the National Planning Policy Framework.
- 4.5 HVDC is a designated District Centre as opposed to a primary centre; it remains considerably below Chatham in the NLP national rankings (and as confirmed in the local Evidence Base), is substantially smaller and has a much more localised catchment than Chatham. We also consider it significant to note that from the NLP survey that Chatham loses comparatively little expenditure to HVDC.

- 4.6 By encouraging more retail and associated investment at HVDC, Medway would benefit from a centre which is capable of helping deliver on the ground some of the quantitative and qualitative needs of the borough in the early part of the plan period.
- 4.7 The emerging Medway Local Plan should, in fact, acknowledge that the HVDC benefits from significant capacity for additional retail/leisure floorspace.
- 4.8 Given Hempstead Valley's location in the south east of the district, additional capacity at HVDC would not only serve Medway itself, but would claw back trade being lost to Medway's largest competitor, namely Maidstone. This would not continue to leave more than sufficient identified need for the redevelopment and regeneration of Chatham, nor would it adversely impact on the investment prospects of the other centres.
- 4.9 We consider that without a flexible and deliverable policy response to meeting retail and leisure needs within the borough, there is a real concern that Medway's shoppers will continue to vote with their feet and take their expenditure out of the borough. If this were to happen then the prospect of any major comparison retail in Chatham at any point in the plan period will significantly recede.
- 4.10 In addition, as stated, the proposed restrictions on town centre floorspace within HVDC could, in fact, act against the longer-term aspirations of the owners to introduce, subject to planning, more non-retail "*town centre*" uses into the District Centre, as all such floorspace would be subject to a sequential , and potentially an impact, test. Such a restriction would hobble the ability of HVDC to adapt to a changing commercial environment and undermine the effectiveness of Medway's town centre planning policy.
- 4.11 In summary, we consider that the draft policies detailed in the Consultation Document are currently "*unsound*", but could be made "*sound*" subject to the responses and evidence requested in the answers to the consultation questions as set out in this response.
- 4.12 On the basis of these concerns and objections, we look forward to the opportunity make future representations and recommendations to the emerging Medway Local Plan as it progresses to submission stage.
- 4.13 We therefore take this opportunity to request that we are kept fully informed of the progress of the emerging Medway Local Plan, including the publication of the evidence base upon which it is to be based.

APPENDIX A – REVIEW OF EVIDENCE BASE

Under the provisions of the National Planning Policy Framework (“NPPF”) test of “*soundness*”, specifically the “*justified*” requirement, Local Plans must be based upon an up-to-date evidence base that identifies development needs within the borough, with those policies and objectives contained within Local Plans meeting this identified need.

Consequently the emerging Medway Local Plan must plan proactively to meet fully the objectively assessed economic development needs of the borough as identified through the evidence base upon which it is based. Indeed, under the provisions of paragraph 14 of the NPPF, meeting these development needs in full through the emerging Local Plan is fundamental in achieving sustainable development.

Existing town centres, such as the HVDC, perform an important role in sustainably meeting the development needs of their area. Indeed, paragraph 23 of the NPPF states that ‘*In drawing up Local Plans, local planning authorities should: recognise town centres as the heart of their communities and pursue policies to support their viability and vitality*’. Local planning authorities should therefore seek to maximise opportunities to meet identified development needs within existing town centres, of which HVDC is one such location.

Achieving sustainable development, which under the provisions of the NPPF should be seen as the ‘*golden thread*’ that runs through plan-making, is intrinsically linked to the identification of development needs, and the adoption of positive policies and objectives to meet this need in full. The identification of development needs is therefore at the heart of the preparation of Local Plans.

Consequently, under the provisions of the NPPF, the emerging Medway Local Plan must be based upon a robust, and up-to-date, evidence base that identifies the quantitative and qualitative economic needs within the borough (including need for retail and other town centre uses). All these points were made in relation to the previous, Development Options consultation (May 2017) and are re-iterated here.

As explained, this Consultation Document details draft policies to guide the future development of the borough. It is intended that they will be taken forward to Regulation 19 submission stage. Accordingly, to seek to meet the NPPF test of soundness, they must plan proactively to meet the objectively assessed development needs.

Consequently, the Consultation Document must be supported by a robust and up-to-date evidence base that identifies fully the development needs (including retail and leisure) within the borough.

In this regard the evidence base that has been prepared in support of the draft policies to-date is incomplete and fails to identify the full development needs of the borough. Indeed, whilst the Consultation Document

suggests that an assessment of future retail and leisure growth capacity in Medway has been undertaken as part of the Strategic Housing and Economic Needs Assessment (SHENA) 2015 (including findings from a Retail and Commercial Leisure Assessment – RCLA), the findings of this assessment are not sufficiently robust to support the objectives of the emerging Medway Local Plan, facilitate informed debate or ensure relevant planning policy on the future of Medway's retail centres is 'sound'.

While the Council has since commissioned a *Retail and Commercial Leisure Assessment - Part 2* (March 2018) ("RCLA2") this does not seek to provide updated quantitative evidence pertaining to retail need and capacity across Medway. Rather, it provides a summary of cross boundary issues; provides a healthcheck of the existing centres (as informed by an on -street survey) and provides guidance as to the direction of future policy and the determination of planning applications.

As noted in the Development Options Consultation, the previous Draft Core Strategy (2011) was supported by the Retail Needs Assessment (2009) prepared by NLP which identified retail and leisure needs within the borough based upon a thorough assessment of consumer behaviour and the health and function of all existing centres within the borough and wider sub-region. In contrast, the SHENA sought only to identify retail and leisure capacity based on spending assumptions and population/demographic trends.

While the RCLA2 addresses some of these deficiencies with a street-based survey of spending and a board healthcheck of the respective centres, this continues to provide an insufficient basis for evidence pertaining to the capacity and needs for retail floorspace within the borough.

The authenticity of the findings of the retail evidence base, which seeks to inform the Consultation Document, cannot yet be properly verified.

As was noted in the Development Options Consultation, those brief findings expressed within the Consultation Document do not comply with the requirements of either the NPPF or National Planning Practice Guidance ("PPG").

Although the emerging Medway Local Plan is to extend until 2035, the evidence base that is presented within the Consultation Document provides only projected Retail and Leisure Capacity up to 2031. Consequently, as in the Development Options consultation, the evidence base that is provided at this stage does not meet the requirements as set out in the PPG.

The absence of an assessment of either current (2016) retail and leisure capacity, or expected capacity at the end of the plan period (2035) is therefore contrary to the requirements of the PPG, and will not enable the emerging Medway Local Plan to meet development needs throughout the plan period.

On the basis that an insufficient evidence base (in particular with regards to retail and leisure needs) remains in support of this Consultation Document, it is contended that the Council remains unable to demonstrate that the strategy for the future development of the borough will meet the objectively assessed development needs in full. Consequently, the draft policies predicated on the basis of this evidence base will be contrary to the objectives of the NPPF and PPG.

On this basis we retain significant concerns regarding both the evidence base presented to-date, and the strategy for the future development of the borough identified through the draft policies in the Consultation Document. The deficiencies in the evidence base are therefore reflected in the responses we have made to the draft policies contained in the Consultation Document, and our answers to the questions thereon.

From: [REDACTED]
Sent: 22 June 2018 14:30
To: futuremedway
Subject: Consultation response

Categories: Blue Category

Dear planning team,

As a inhabitant of the Hoo Peninsula for the last 21 years, I am deeply concerned by the proposed plans for the area in which I live. We live in an area of outstanding natural beauty full of wildlife. I moved here because I wanted to raise my family in this almost rural area. I wanted them to have the freedom to play and explore outdoor life, something that our landscape provides.

My issues with these plans are;

- There is one secondary school for the whole area - My children's bus passes cost £50 each per week, just for them to attend school!
- The bus service to this area is currently poor and does not have a consistent timetable regular enough for people to rely upon.
- There is one main road (Four Elm's Hill) into this area with a small side road leading into the army roads. During bad weather these roads have been closed cutting this whole area off.
- The roads into Hoo itself are awful and with the recent closures of Bells Lane, this caused horrific traffic along Main Road as it was the only route out of the area. Due to poor public transport, more people will have to drive and an increase of traffic will make these roads worse.
- Health services are limited in this area and we are often shunted to other surgeries or health centre's for appointments.
- There is a lack of things for young people to do. There are some areas within the Chattenden and Hoo area that have serious anti-social behaviour problems. This will be exacerbated with more and more young people on the streets with nowhere to go. No youth clubs, or activity areas such as skate parks and play areas, for them to go.
- There needs to be a prominent presence of local police/special constables to deter previously stated anti-social behavior, or even CCTV to catch the young people whizzing up and down the road on mopeds/bikes and now even cars.

Just building houses without listening to current residents and the issues that they already face is quite frankly, irresponsible.

Kind regards,

Sarah Vince

Sent by email to: futuremedway@medway.gov.uk

25/06/2018

Dear Sir/ Madam

Response by the House Builders Federation to the Medway Local Plan – Development Strategy

Thank you for consulting the Home Builders Federation (HBF) on the Medway Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

In preparing this response we recognise that there are difficulties in continuing to move forward with plan preparation given the potential changes in policy that are being proposed by Government. Whilst there is uncertainty as to whether all the changes being proposed will be adopted by the Government it is important that these potential changes are not ignored and welcome the fact that consideration has been given to issues such as the standard methodology. In our response we will continue to refer to current policy and guidance but also look to highlight where the Council may need to consider its approach should the policy and guidance being consulted on be adopted. Our key concerns are highlighted below.

Progress in plan preparation

We are concerned with regard to the slow progress of plan preparation within Medway. It has been over 2 years since the consultation on the issues and options consultation was published in February 2016 and a further year since the development options consultation report was published in January 2017. However, there has been little progress with regard to both the level of need and how the Council is going to meet these needs. Whilst we recognise that the policy situation has been in the process of being amended, the Housing White Paper and other consultations have given very clear signals as to the Government's direction of travel. In order to speed up plan progress the Council should apply the standard methodology and prepare a plan that meets this level of need. Such an approach would ensure that with regard to the key stumbling block of housing need the plan could be considered sound.

Duty to Co-operate

In taking forward this plan it will also be essential that the Council identifies whether or not any of its neighbouring authorities will be unable to meet their development needs. If they cannot meet needs the Council must consider whether they will be able to support those authorities in delivering more housing to address these unmet needs. It is important to remember that it is for Local Planning Authorities to work collaboratively, and to act strategically, in order to meet development needs and it is insufficient to simply state that their own needs are being met. The Council should therefore begin to prepare statements of common ground with its neighbouring authorities to establish a shared position on housing needs and how these needs will be met. If the needs of the HMA, or other relevant neighbouring authorities, cannot be met then the Council must establish with its neighbours how those needs will be met through further duty to cooperate activity.

Development strategy

Section 3 of the consultation document defines the development needs for Medway and sets out the housing needs scenarios considered by the Council. What is evident from this section, and the Council's evidence base, is that the Objective Assessment of Housing Needs (OAN) established in the Strategic Housing and Economic Needs Assessment (SHENA) 2015 is significantly lower than the level of housing needs resulting from the standard methodology. Our concern is that should the Council seek to meet OAN as set out in scenario 1 then the Council will not ensure the necessary improvements in affordability that the Government are clearly trying to achieve through both the current approach set out in PPG and through the proposed standard methodology. Our comments on the SHENA are set out below.

Strategic Housing and Economic Needs Assessment

Demographic starting point

Our first concern with regard to the SHENA is that it was published in 2015 and as such does not consider the most up to date data with regard to population and household projections. To properly consider housing needs in the manner prescribed by PPG the Council will need to prepare a SHMA using the 2014 based household projections. These are the most recent published household projections and are considered by Government to be the most robust assessment of housing needs. Though the Government have recently published the latest 2016 based sub national population projections and which will inform the latest household projections due to be published later this year.

However, whilst these latest projection are considered robust it will be important for the Council to consider whether household growth has been suppressed by poor delivery of new housing in the past. Considering that the latest Authority Monitoring Report (AMR) indicates that since 2013 the Council has failed to deliver its annual housing requirement of 1,000 dwelling per annum(dpa) there is likely to have been a significant degree of suppression within household growth to make an adjustment to the demographic starting point of these latest projections. It will be important that any past under delivery is robustly considered and appropriate adjustments made to compensate for any suppression.

Market signals

The SHENA states on page 123 that it considers a modest uplift of 8.6% is required in response to what are considered to be mixed market signals. However, we would suggest that the latest market signals indicate that a much higher adjustment is required if the level of delivery being proposed, as required by paragraph 2a-020 of PPG, can reasonably be expected to have an impact on affordability. The most recent evidence on affordability for Medway shows that the ratio of lower quartile housing prices to incomes has increased from its pre-recession high of 7.31 in 2007 to 9.50 in 2017. Similarly median affordability ratios have also worsened increasing from 6.47 in 2007 to 8.25 in 2017. We recognise that these ratios in 2015 suggested that affordability had been relatively stable, however, these latest figures suggest that the Council response to market signals needs to be adjusted to reflect a steeply worsening trend with regards to affordability.

Therefore the key question is by how much should the demographic starting point be uplifted in response to market signals? Prior to the consultation on the standard methodology the Government did not provide an indication as to the degree of uplift that LPAs should make in response to market signals. Uplifts varied greatly from 5% to 25% but most recently SHMAs have included uplifts that have been significantly higher than those brought forward shortly after the introduction of PPG. Braintree, Cheltenham, Waverley, Canterbury and Cambridge have all adopted OANs where the market signals uplifts were 20% or more. Whilst some of these authorities have significantly worse overall affordability they have seen similarly worsening trends in affordability.

Whilst the Government have been clear that the standard methodology should not be considered for plans submitted within 6 months of the new NPPF being published the Government's commitments to substantially increasing the number of homes delivered each year should be taken into account when considering the level of uplift to be applied in response to market signals. The Government have stated that their goal is to deliver at least 300,000 new homes each year from 2020. Most recently this target was reiterated in the 2017 Autumn Budget. In his budget statement the Chancellor announced the Government's target for house building across the country stating:

I'm clear that we need to get to 300,000 units a year if we are going to start to tackle the affordability problem, with the additions coming in areas of high demand.

We can therefore conclude that the Government considers its target of delivering 300,000 homes per annum is the minimum requirement if the nation is to start addressing the issue of affordability and that these additions must be made in the areas of high demand, and subsequently, worst affordability. To achieve the Government's aim will therefore require Council's to provide significantly higher uplifts than we have seen being applied in the past under current policy and guidance. In-deed had these been uplifts been sufficient in the past there would in all likelihood have been no need for the proposed amendments to the NPPF and the introduction of the standard methodology. We would therefore suggest that on the basis of the latest evidence the Council's SHMA has

significantly underestimated its response to market signals. As a minimum we would suggest that this should be a minimum of 20% above the demographic starting point for the Council to have a reasonable expectation of improving affordability.

Affordable housing

The Council have identified that they need to deliver 17,112 affordable dwellings over the plan period to meet needs. None of the development scenarios proposed are able to deliver this level of need due to the viability of development in the Borough. Based on the Council's viability assessment and 25% of homes being provided as affordable units would require the Council to build 68,448 homes. This level of delivery is clearly unreasonable but it does provide a good indication that the degree of uplift proposed in the SHMA is inadequate and that the Council's OAN should consider, as required by PPG, whether a higher uplift would provide an improved response to the need for affordable homes.

Conclusions on housing needs

Scenario 3 of the consultation suggests that the Council should seek to meet the level of need as based on the standard methodology of 37,143 homes. Given the increasing concerns regarding affordability levels and the fact that the Council cannot meet its need for affordable housing of 17,112 we would suggest that this scenario is the most appropriate option. Given that the Government expects to publish the latest NPPF and PPG in the summer we would suggest that the Council seeks to prepare a plan on the basis of the standard methodology. This will require the Council to submit the plan 6 months following the publication of the new NPPF.

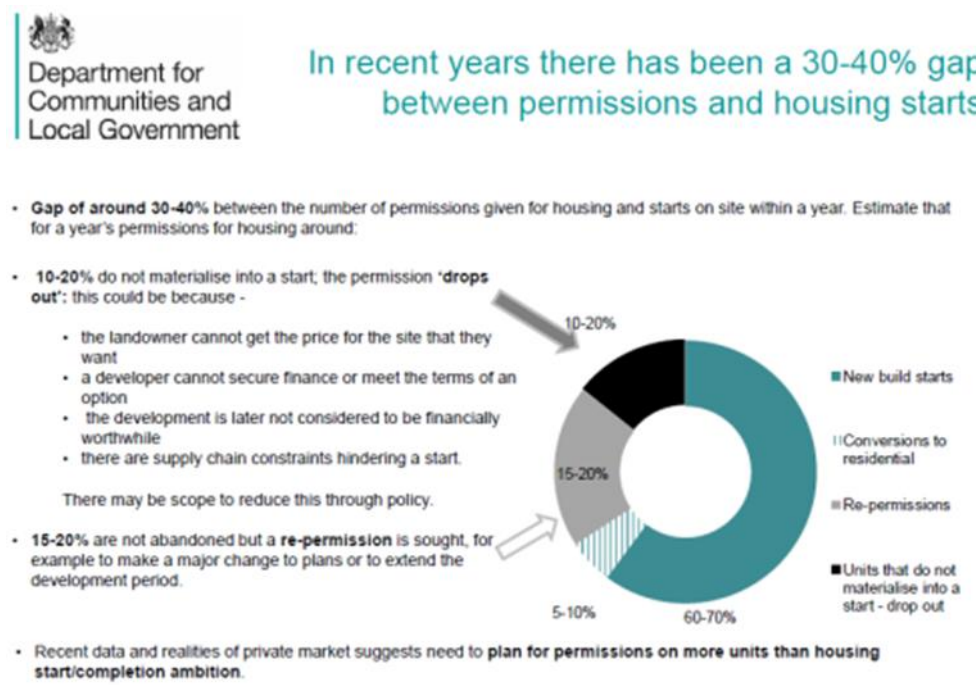
Distribution of development

In considering the distribution of development the Council has considered 4 scenarios. Only one of these scenarios considers meeting the level of need the Government are likely to expect Medway to deliver. However, it would appear that this scenario overestimates the level of need that would result from the standard methodology. This seems to stem from the Council's decision to use a plan period starting from 2012 when considering the application of the standard methodology.

In arriving at the housing need figure of 37,143 in scenario 3 it looks as if the Council have included in their estimate the backlog in delivery from the period 2012 to 2016 but this is not clear. If the Council have taken such an approach the Council have failed to understand that by applying the Standard Methodology the Government are effectively resetting the clock on housing needs and that any past under delivery against previous targets/ OAN are included in the market signals uplift. The Government have taken the position that where Councils have been under delivering it is likely that affordability is worst, which in turn will lead to a higher uplift. Because of this the plan period should start from 2016 and be for a minimum of 15 years as required by national policy. The approach taken in meeting the standard methodology with a base date of 2016 would be significantly different and it is important that the Council do not discard the Government's

figure on the basis of this much high figure which the Council suggests would be unsustainable and that the impacts difficult to mitigate.

However, in considering the delivery it will be important that the Council includes a buffer within its provision to allow for any delays in the delivery of strategic sites for example. These concerns have been highlighted by DCLG in a presentation to the HBF Planning Conference in September 2015.



This slide illustrates that work by the Government suggests 10-20% of residential development with permission will not be implemented and that there is a 15-20% lapse rate on permissions. This does not mean to such sites will not come forward but that delays in delivery, changing ownership or financial considerations can lead to sites not coming forward as expected. For this reason DCLG emphasised in this slide *“the need to plan for permissions on more units than the housing start/completions ambition”*. Therefore, should the housing requirement need to be higher than is proposed in the Plan it will be important that such a buffer is maintained and that sufficient sites are allocated to support at least 10% more units than are required.

Green Belt

In seeking to meet needs the Council recognise in paragraph 7.27 of the consultation document that they will test whether there are exceptional circumstances to justify revisions to the Green Belt boundary in Medway in order to support further development. The draft NPPF maintains the consideration of exceptional circumstances. However, paragraph 136 sets out that before concluding that exceptional circumstances exist the Council will have examined all other reasonable options. Given that the Council will not be able to meet its needs established by Government in the standard methodology it will be important that the Council considers potential amendments to the Green Belt

boundary to support growth. In addition to unmet needs and an worsening affordability the Council are also unable to meet the areas need for affordable housing (58% of the OAN identified in the SHENA). All these factors indicate that the circumstances faced by the Council are sufficiently exceptional to allow for some amendments to the Green Belt boundary.

We note that in paragraph 7.27 the Council state that a Green Belt Review has taken place. We welcome such actions and it would have been helpful for this evidence to have been published as part of this consultation. This would have enabled the Council to put forward a scenario including Green Belt release. Without such a scenario the plan has not considered all reasonable options and assessed those options through the Sustainability Appraisal.

Conclusions on the development strategy

In considering their development strategy we would suggest that the most likely scenario is that the Government's proposed standard methodology will be in place and the Council will need to decide how to best meet this level of need. If the Council is to have confidence that its plan will be found sound then it must ensure it meets this minimum requirement. Whilst scenario 3 would ensure needs are met it is important that the Council ensures the sustainability of its plan. As such the Council needs to consider whether it should amend Green Belt boundaries in order to support the objective of meeting needs in full. It is important that policy designations such as Green Belt are tested through the local plan to ensure that the designation remains appropriate and is not restricting growth unnecessarily.

Housing policies

H1 Housing Delivery

It is impossible to state whether the Council's approach is sound as the policy provides no indication as to level of housing the Council are proposing to deliver over the plan or the allocations it considers necessary to support delivery. As such we are limited as to the comments we can make. However, key to the soundness of this policy and the plan in general is that the Council must ensure that it meets in full the housing needs of the area as determined by national policy. Should the Council not be able to meet needs within the Borough then it must set out where those unmet needs will be provided. If the Council cannot meet housing needs in full then the plan cannot be considered to be sound.

The only other comment we would like to make with regard to delivery is the importance of ensuring a sound delivery trajectory. In allocating sites within the plan it will be essential that the Council looks to ensure that delivery is not overly reliant on large sites coming forward early in the plan period. Our experience is that many local authorities expect strategic sites to start delivering much earlier than is likely. Overly optimistic delivery expectations are likely to lead to the Council failing to meet its long term delivery goals. By making realistic estimates of delivery the Council must recognise that strategic sites

may deliver beyond the plan period and as such smaller sites should be allocated that can meet needs earlier in the plan period.

Not only does this ensure overall plan delivery is more likely it also means that Council are more likely to have a five year land supply without having to resort to stepped trajectories and the distribution of any backlog across the plan period. Whilst we recognise that where appropriate stepped trajectories can be used it is essential that the Council commit to addressing any backlog within five years. Not only is this approach consistent with PPG it also ensures that much needed housing is not put off until the end of the plan period.

H2 Housing mix

The Council should ensure that there are a sufficient ranges of sites that will allow the Council to deliver the mix of housing across the Borough. It is important with policies on housing mix that there is sufficient flexibility to ensure that sites are not compromised by overall detailed and unrealistic requirements for housing mix. In particular the viability of small and medium sized sites can be compromised by overly specific requirements with regard to the mix of housing provided. Developers are best placed to ensure that most effective mix of sites with regard to its location, the market it serves and the need to maximise viability of the market homes in order to try and best meet other requirements such those for affordable housing.

H3 Affordable housing

It will be important for the Council's policy on affordable housing to be in conformity with the new NPPF when it is published in the summer. The current draft indicates that there is likely to be significant changes in the approach taken to affordable housing that will need to be carefully considered by the Council. The most obvious change is the requirement to consider land values on the basis of Existing Use Value plus an uplift to secure its release by the land owner. However, the Government are now expecting viability to be considered primarily during the preparation of the local plan and that negotiations at application should be limited. Without the ability to be more flexible when considering developments at application will require Council's to set less aspirational affordable housing policies in order to ensure that development comes forward without the need for negotiation.

H9 Self-build and custom housebuilding

We broadly agree with the approach set out within policy H9 that seeks to encourage self-build and custom housebuilding and that the Council are considering how they can use their own land to support this sector of the market. It is important that the Council seeks to encourage land owners to bring forward land for self-build rather than imposing such requirements on the development industry. As such we do not consider the allocation of sites as suggested in question H15 to be an appropriate way forward and one that is consistent with paragraph 57-025 of PPG. This paragraph outlines that the Council should engage with landowners and encourage them to consider self-build and custom housebuilding. The approach taken by the Council moves beyond

encouragement and requires land owners to bring forward plots. We would suggest that such allocations should only be made where there is a clear willingness from those parties promoting the site that they support its allocation for self-build housing. Given the housing needs arising from the standard methodology there is a significant risk that the Council will over provide homes if it were to require 5% of homes on sites over 400 to provide self-build plots. At present there are only 39 people registered on the self-build register. If this is the latent demand within the existing population it is not reasonable to expect that this will increase to 600 by the end of the plan period. There may be some growth but it is likely to be far less than is set out in the consultation document.

Where it is agreed that some plots for self-build and custom housebuilding are to be provided within larger but which are not sold it is important that the Council's policy is clear as to when these revert to the developer. At present this policy makes no such provision, as such it is ineffective. We would suggest the policy states that where a plot remains unsold after 6 months of it being offered on the open market then it should revert back to the developer to be delivered as part of the overall scheme. We would also recommend that if development of a purchased plot has not commenced within three years of purchase that the buyer be refunded and the plot reverts to the developer. It is important that plots should not be left empty to detriment of its neighbours or the development as a whole.

Economic policies

E1: Economic development

Paragraph 22 of the NPPF establishes the need for local plans to be flexible when considering others uses on land allocated for an employment use. Where there is no reasonable prospect of a site being used for its allocated employment use the NPPF considers that any applications for other uses should be "*considered on their merits and having regard to the relative need for different land uses to support sustainable communities.*". Policy E1 as it is currently written does not provide the necessary flexibility to ensure that where such sites occur within Medway there are clear mechanisms to ensure it can be redeveloped. We would suggest that in order to make this policy sound the Council sets out the circumstances against which the loss of employment land will be considered appropriate. This could include assessments as to how long a site has been vacant, periods of marketing and the consideration of the benefits that may accrue from any redevelopment.

Built environment

BE3 Housing Design

If the Council are to require the nationally described space standards (NDSS) they will need to ensure they have sufficient evidence in relation both need and viability as required by PPG. However, despite this being one of only three technical standards that can be applied through the local plan the Council are seeking to expand this to the layout of new homes. The fifth and sixth bullet points of the policy require consideration with regard to layout, circulation space storage and clothes drying. These clearly go beyond

both the PPG and NPPF and as such cannot be considered as consistent with national policy and should be deleted.

Health and Communities

HC1 Promoting Health and Well Being

We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all applications requiring an Environmental Impact Assessment (EIA) to undertake a Health Impact Assessment (HIA) and all applications to demonstrate how they have mitigated any potential negative effects on health is unnecessary and an additional burden on applicants. The PPG sets out that HIAs “*may be a useful tool to use where there is expected to be significant impacts*” but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Where a development is in line with policies in the local plan an HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA.

Transport

T10 Vehicle Parking and T11 Cycle Parking and Storage

The Local Plan does not contain the relevant standard and instead suggests that these will be set out elsewhere. As these standards will impact on the form and viability of development they should not be established outside of the Local Plan. This principal was most recently tackled in *William Davis Ltd & Ors v Charnwood Borough Council* [2017] EWHC 3006 (Admin) (23 November 2017) where supplementary planning document strayed into an area that should be considered by a development plan document. This decision quashed an SPD that contained policies that clearly encouraged and imposed development management policies against which a development could be refused. By setting the actual parking standards outside of the Local Plan they cannot be challenged at examination despite the clear impact they could have on viability and decision making. We recommend that should the Council wish to adopt parking standards these are set out in the local plan to ensure a full and proper examination of their impacts.

Minerals, Waste and Energy

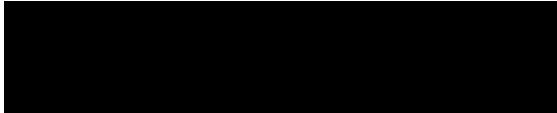
MWE12: Low Carbon Development



Developers cannot be required to follow the hierarchical approach set out in this policy when achieving energy efficiency and carbon dioxide requirements of Building Regulations. Whilst we do not object to LPAs encouraging a specific approach it must remain up to the developer as to how they achieve the requirements of Building Regulations.

Conclusion

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation. Should you require any further clarification on the issues raised in this representation please contact me. We would also welcome the opportunity to come and discuss with the Council how they will approach the new policy framework in their local plan.

Yours faithfully

A large black rectangular box redacting the signature of Mark Behrendt.

Mark Behrendt
Planning Manager – Local Plans
Home Builders Federation
Email: 
Tel: 



MEDWAY LOCAL PLAN

2012-2035

***DEVELOPMENT STRATEGY
CONSULTATION
RESPONSE***

On behalf of Mr G and Mr K Jordan in respect of
land at Chattenden Farm.

June 2018
DHA/JAC/

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1 Introduction

1.1 Purpose of this Statement

- 1.1.1 These representations have been prepared on behalf of Mr G Jordan and Mr K Jordan for their landholding at Chattenden Farm, Lodge Hill Lane, Chattenden, in respect of Medway Council's current Local Plan 'Development Strategy' Local Plan Consultation 2018.
- 1.1.2 Medway Council is in the process of preparing a new Local Plan to set out a strategy for development for the period 2012 to 2035 and is asking for views on 'Development Strategy' as a follow up to the 'Development Options' and 'Issues and Options' consultation that informed the early stages of the preparation of the plan. These representations are provided in order to aid the Council in the achievement of a sound replacement plan.
- 1.1.3 Mssrs, G and K Jordan have ownership of land at Chattenden Farm. The land comprises a group of farm type buildings and related paddock land. The land lies to the immediate south and east of the MOD site at Chattenden (Lodge Hill) and in our submission ought to be considered as part of that strategic allocation to add more flexibility and ability to respond to ecology issues for the land at Lodge Hill. It is considered that the inclusion of this additional land would help to ensure that the Council's aspirations for Lodge Hill, especially in respect of delivery of significant unit numbers is achievable.
- 1.1.4 We consider the site represents a suitable and sustainable location to sensitively amend the settlement boundary for inclusion as a mixed residential and commercial allocation for the whole of Lodge Hill and adjoining Land.



- 1.1.5 These representations are focussed on how the site could assist in delivering the strategic objectives of the Council and how this would align itself with the emerging and updated strategy options. The response primarily focuses upon the four updated scenarios subject to consideration. However, we also take this opportunity to reiterate why our client's land represents a suitable and sustainable site that should be included as an allocation (as set out above) as the plan progresses.

1.2 Document Structure

- 1.2.1 Chapter 2 provides feedback on the potential development options being considered by the Council as part of the current consultation.
- 1.2.2 Chapter 3 includes feedback on the more generic housing policy approaches.
- 1.2.3 Chapter 4 promotes the development of sensitive Greenfield release Chattenden Farm, in association with the wider promotion and allocation of land at Lodge Hill.

2 Comments on the Development Options

2.1 Vision and Strategic Objectives

2.1.1 We understand that the intended role of the Medway Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment.

2.1.2 The core plan objectives of the emerging Local Plan are broken down into four sub categories, which include the following:

'A place that works well'

- To boost the performance of the local economy by supporting local businesses to grow and attracting inward investment through the provision of good quality employment land that meets the needs of businesses, and to secure and extend higher value employment opportunities;
- To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses;
- To ensure Medway's recognition as a University city and realise economic and place making opportunities associated with the learning cluster of higher and further education providers in Medway;
- To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services;
- To strengthen and develop the transport network providing safe and effective choices for travel, including management of the highways network, enhanced public transport systems, and improved opportunities for walking and cycling, with associated improvements in air quality.

'A riverside city connected to its natural surroundings'

- To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development.
- To address the challenges of climate change, seeking adaptations and opportunities to promote carbon reduction and mitigation measures, and reduce the risk of flooding;
- To ensure the effective management of natural resources, including water, air and soil, and the sustainable supply of minerals and appropriate management of waste.

'Medway recognised for its quality of life'

- To reduce inequalities in health by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public realm

design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of local services and dementia friendly environments;

- To provide for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs;
- To strengthen the role of Medway's town, neighbourhood and village centres, securing a range of accessible services and facilities for local communities, and opportunities for homes and jobs, with Chatham providing the focus for new retail and community facilities.

'Ambitious in attracting investment and successful in place making'

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

2.1.3 These strategic objectives are as outlined within the previous 'Development Options' consultation in 2017.

2.1.4 We would therefore reiterate that we support the principle of all of the objectives and the foundations of the emerging plan. However, we would continue to suggest some minor modification is needed to ensure the plan is positively prepared and fully aligned with the provisions of both the current and emerging revised National Planning Policy Framework (NPPF).

2.1.5 Specifically, we consider objectives should be modified to provide more certainty that the scope to provide the full 37,000 home housing target will be fully explored if Medway is to secure its role as a vibrant city (rather than a collection of merged towns).

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

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

2.2 Sustainable Development Options

- 2.2.1 Having regard to the options being considered, we understand the support for the promotion of brownfield land ahead of Greenfield sites. Nevertheless, given the known housing need, and the pending introduction of a standardised methodology that will raise this further, it is inevitable that substantial amounts of greenfield land will be needed. This should therefore take place in the most sustainable locations with the necessary capacity for growth.
- 2.2.2 Given that Chattenden Farm is immediately next to one of the Council's favoured housing sites and is one of the most natural and sustainable locations to extend existing built areas, we advocate it as a development site to be delivered in the early years of the plan, or as Lodge Hill comes forward.

2.3 Development Scenarios

- 2.3.1 We note that the consultation document presents four development scenarios to meet the aims of the local plan, which are summarised below:

1. *Meeting the assessed housing need of 29,500 homes-*

Development scenario 1 seeks to meet the councils objectively assessed need of 29,500 homes across the plan period. This would focus housing on brownfield urban sites, but also involves the proposed development of a rural town on the Hoo peninsula and suburban expansion. This scenario does not include development of Lodge Hill. In line with the Councils analysis of the number of homes needed to support the area's population growth and change up to 2035. The broad distribution of development would be as follows:

- *Urban sites- 12,775 dwellings*
- *Hoo peninsula- 9,318 dwellings*
- *Suburban sites- 4,528 dwellings.*

2. *Investment in infrastructure to unlock growth-*

Development scenario 2 takes a similar approach to scenario 1 but with a greater emphasis placed on securing funding for infrastructure that would facilitate higher density of development on the hoo peninsula and a faster rate of delivery. This would reduce the need to release land in suburban locations and increase the overall supply of housing to 31,000 homes. The broad distribution of development would be as follows:

- *Urban sites- 12,775 dwellings;*
- *Hoo peninsula- 11,750 dwellings;*
- *Suburban sites- 3179 dwellings;*

3. *Meeting Governments target of local housing need of 37,000 homes-*

Development scenario 3 presents a strategy for growth that responds to the definition of local housing need by the government's proposed standard method, which calculate a need for 37,000 homes. This approach would be reliant on a greater amount of

development in suburban locations. The broad distribution of development would be as follows:, higher density urban regeneration and a potential loss of employment sites.

- *Urban sites- 14,194 dwellings;*
- *Hoo peninsula- 12,162 dwellings;*
- *Suburban sites- 6,276 dwellings.*

4. *Development of Lodge Hill SSSI*

Development scenario 4 would use land at Lodge Hill- which is designated as a Site of Special Scientific Interest (SSI) - to create a new settlement on the hoo peninsula. 2,000 homes are proposed with supporting services, with the majority of land protected from development. This approach would recue the need for suburban expansion and would provide funding for nature conservation projects

- *Urban sites- 12,775 dwellings;*
- *Hoo peninsula- 10,357 dwellings;*
- *Suburban sites- 4,108 dwellings.*

- 2.3.2 In considering the four options presented, we are concerned about confusion between targets and associated strategies. For example, to properly consider the effectiveness of a strategy a consistent benchmark is needed. Accordingly, the housing option for all four options should be the achievement of 37,000 new homes within the plan period. Thereafter, views should be sought on which planning strategy would best achieve the required 37,000 home target with the flexibility to rapidly respond to change.
- 2.3.3 Without the consistency, there is a genuine risk of selecting the right strategy with the wrong housing target or vice versa.
- 2.3.4 In addition, and fundamental to whether the plan can be regarded as sustainable there could be issues with failing to consider properly the need for infrastructure, employment, services and community facilities which will result in potential for issues arising due to lack of education, health provision, housing and jobs. We are concerned that instead of addressing some of the currently poor indices of deprivation, a plan that fails to properly plan for objectively assessed needs could serve to worsen some or many of the indices by not matching housing and infrastructure/community facility needs.
- 2.3.5 For the avoidance of doubt, we consider the options that should be considered should more accurately be presented as follows:
- .1. Scenario 1 should consider how 37,000 homes and appropriate commensurate infrastructure and services can be achieved primarily by focussing housing on brownfield urban sites, the development of a rural town on the Hoo peninsula and further but limited suburban expansions including at Chattenden Farm/Lodge Hill;
 - .2. Scenario 2 presumably should takes a similar approach to scenario 1 and should consider how 37,000 homes and appropriate commensurate infrastructure and services could be delivered, but with a greater emphasis on infrastructure to support the delivery of the Hoo peninsula, a faster rate of delivery and reduced reliance on suburban sites, albeit we still advocate Chattenden Farm and Lodge Hill

on the basis that Lodge Hill is a very large brownfield site that is well located to major transport interchanges;

- .3. Scenario 3 should focus on how 37,000 homes and appropriate commensurate infrastructure and services can be accommodated with greater emphasis on suburban growth;
- .4. Scenario 4 focus should factor in the potential for growth at Lodge Hill/Chattenden Farm and other adjoining land to accommodate the 37,000 homes.

2.3.6 In our view, the strategy options need refinement. Scenarios 1, 3 and 4 are much the same strategy, with the only variants being the housing target and the location of growth on the Hoo Peninsula. They are not therefore different or bespoke options and in our submission it will be necessary to combine all of the strategy “options” to meet the OAN and related development and social infrastructure needs. It is our view that Lodge Hill/Chattenden Farm and indeed other adjoining land should be considered to provide a large scale development. Inclusion of sites such as Chattenden Farm will ensure that a suitable scale of development is achievable and assist with the provision of buffers and mitigation for ecology matters. Given the lack of clarity, we respectfully suggest that Medway go back and review options in two key stages;

- .1. First, assess the level of growth that should be accommodated; 29,500, 31,000 or 37,000 homes; and
- .2. Then, establish the strategy options for meeting this growth and appropriate commensurate infrastructure and services and how such development would be disbursed.

2.3.7 Notwithstanding that we consider further work is needed, we favour a strategy based upon an appropriate mix of urban and suburban sites and growth at Hoo. However, caution must also be had to the reliance upon the creation of a rural settlement on the Hoo peninsula, which would account for over a third of the councils proposed housing numbers. If this approach is to be followed, the level of urban and suburban sites must be significant enough to deliver constant delivery of housing whilst key planning principles and infrastructure is considered. Likewise, the Council should consider other land at Lodge Hill to give more certainty to the ability of a project to deliver development of what is a very large brownfield site while minimising risks associated with non-delivery.

2.3.8 It is sensible to include what is a very large brownfield site, but the plan requires sufficient flexibility to ensure delivery

2.3.9 We consider that Medway must prioritise the delivery of sites such as Chattenden Farm given the logical nature of the release of what is a sustainably located edge of settlement site with excellent access to services and facilities, as well as employment.

3 Comments on the General Policy Approaches

3.1 Housing Delivery and Mix

- 3.1.1 In line with the emerging updated NPPF, we consider the Local Plan should be based upon a housing target that reflects the Government's Standard Methodology for calculating housing need. The starting point should therefore be the achievement of 37,000 homes with sufficient flexibility to rapidly be able to respond to changes in circumstance.

3.2 Affordable Housing

- 3.2.1 We note that initial analysis indicates a percentage of 30% affordable housing in rural areas and 25% in urban Medway on residential developments over 15 units.
- 3.2.2 We support the inclusion of this as a formal threshold, subject to the policy containing sufficient flexibility to allow a departure where viability is likely to be undermined.

4 Promotion of Chattenden Farm, Lodge Hill.

- 4.1.1 In line with the comments presented in sections 2 and 3 of this document, we consider that the site can deliver housing within a short to medium timescale.

4.2 Overview of Allocation Sought

- 4.2.1 Detailed proposals have not been advanced albeit we would simply advocate adding the site to the overall masterplan.

- 4.2.2 Key constraints are:

1. Ecology/SSSI on adjacent land.
2. Existing trees and hedgerows
3. Relationship to existing properties

Implications of the NPPF

- 4.2.3 The introduction of the NPPF has significantly changed the context of the planning system, particularly in respect of the plan making process. Emphasis is now on local planning authorities to meet the full objectively assessed development needs of their housing market areas and, where possible, those of neighbouring areas (including the overspill/unmet need from London).
- 4.2.4 Whilst it is acknowledged that Medway is constrained, previous housing targets have fallen well short of the level of need required in the area. Consequently, with the NPPF in force it is now necessary for the Council to identify and meet its full requirements.
- 4.2.5 With all of the above in mind, we consider the most sound approach to plan making within Medway would be to maximise all opportunities to deliver sustainable development and to do so in a way that also maximises the potential of sites and their potential to add to the local economy.

4.3 Generic Planning Issues

Sustainability

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

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

a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a

high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

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

- 4.3.2 Development on this site would contribute to the achievement of sustainable development due to a series of economic, social and environmental benefits. The fact it lies immediately next to a proposed major site assists its sustainability credentials.
- 4.3.3 Provision of housing would help ensure that sufficient land of the right type is available in a sustainable location within the early phases of the emerging plan period. It would provide new homes in a location where people wish to live with excellent access to both town, countryside and essential day to day services.
- 4.3.4 The delivery of housing would also provide an economic benefit during and after build out. Construction jobs would be maintained or created, and household expenditure generated by future residents would support economic activity locally. Housing development would also enable the Council and local community to benefit from revenue linked to Section 106, CIL contributions and a New Homes Bonus.
- 4.3.5 From a social perspective, a suitably designed mix of both open market and affordable residential units would provide housing in a sustainable location that has been in short supply in recent years and that will therefore help see the needs of present and future generations being met.
- 4.3.6 Having regard to paragraph 7 of the NPPF and core sustainability objectives, we consider the site is sustainable.

Access

- 4.3.7 In terms of vehicular access, the submission site benefits from different opportunities via the Frindsbury Hill, Parsonage Lane and the newly constructed access to the quarry.
- 4.3.8 Detailed assessment of these access points is being undertaken but initial findings are that safe and suitable access can be provided.

4.4 Deliverability

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

Availability

- 4.4.2 Availability is essentially about confirming that it is financially viable to develop and viability remains a central consideration throughout plan making and this is set out in the NPPF (Para 159).

- 4.4.3 We can confirm that, subject to reasonable S106 contributions being sought, there are no financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the plan period.

Suitability

- 4.4.4 For reasons set out in this statement the site is considered suitable for development.
- 4.4.5 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

Achievability

- 4.4.6 There are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

Landscape Impact

- 4.4.7 It is acknowledged that the site is situated outside of the current built up area, however, there is clear potential for developing the site in a sensitive way that delivers a more sensitive transition between the hard and dense urban edge and the open countryside.

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

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

4.5 Summary and Conclusion

- 4.5.1 Taking all of the above matters into consideration and subject to resolution of previous concerns in respect of the SSSI at Lodge Hill, we consider the addition of land at Chattenden Farm and indeed other adjacent sites, for a residential lead development on the site could be achieved within a reasonable timescale.

20th June 2018
613/A3/JJA

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

Dear Sirs

**Re: Medway Council Local Plan 2012-2035
Development Strategy - Regulation 18 Consultation Report March 2018
Representations on behalf of Redrow Homes Limited
Land at Walnut Tree Farm, r/o Longfield Ave/ North of Britannia Lane, High Halstow**

I write with reference to the above. As you will be aware I act for Redrow Homes Limited who have various interests in Medway, including those at Walnut Tree Farm, High Halstow (SHLAA site 0835). To this end I wrote to you in February 2016 commenting upon the Medway Council Local Plan – Issues and Options Consultation Document, in particular the Objectively Assessed Housing Need (OAHN) figure of 29,463 between 2012 and 2035 (1281dpa), the link between the level of housing and employment growth being promoted in the plan; the mapping of the environmental constraints; how development in areas that are close to environmentally sensitive locations can actively enhance them / control access to them/ contribute towards an effective green infrastructure network; how a ribbon of small scale urban extensions/ extensions to existing villages in the Hoo Peninsular could help improve access to public transport and address the decline in rural services in this part of Medway; and the merits of the starter homes initiative. We also highlighted the fact that rather than concentrate development in one settlement in the Hoo Peninsular the Council should look to a ribbon of smaller scale growth within the existing villages on the Peninsular to complement a larger scale expansion to Hoo/ Hoo St Werburgh. We also highlighted the fact that Villages such as High Halstow are in our opinion capable of accommodating small scale growth that would complement that in the likes of Hoo and help maintain local services and facilities/ bolster public transport links between the villages to the benefit of all on the Peninsular.

I also wrote to you in March 2017 on the Medway Council Local Plan – The Development Options Consultation Document, reiterating our views on the OAHN, the relationship between the employment growth forecasts in the SHENA and the proposed housing target, and the four development options promoted in the Development Options Consultation Document. In doing so I questioned how realistic option 1B (maximising the potential of the urban regeneration) really was; and the environmental implications of option 1D (Rural Focus).

Having reviewed the Development Strategy - Regulation 18 Consultation Report March 2018 I have the following comments:

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?

We consider the plan should be looking to accommodate Scenario 3: Meeting the Government's proposed calculation of Local Housing Need i.e. 37,143 dwellings over the plan period (2012-2035).



All other options only look to address the SHMA i.e. 29,463 dwellings over the plan period, albeit we note that options 1, 2 and 4 all manage to deliver slightly more than the SHMA requirement (+487 for option 1, +1,570 for option 2 and +1,106 for option 4). Whilst option 3 is, we appreciate, a challenge, and at present the plan falls 1,182 short of the requirement, the NPPF is clear in that LPA's should be looking to 'boost significantly' the supply of housing, and that LPA's should, through their SHMA assess their full housing needs, and 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; and

—caters for housing demand and the scale of housing supply necessary to meet this demand.

As a separate exercise they then need to prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. It may well be that the councils ability to accommodate the requirement identified by Scenario 3 is not achievable, but the council should in the first instance try and achieve this.

In the context of the above the Spatial Development Strategy may need to be revisited as at present it is unclear what is meant by phrases such as '*a small rural town based around Hoo St Werburgh*' and '*a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling*'; albeit we note that all 4 options show the same level of growth around High Halstow, including the land at Walnut Tree Farm, High Halstow (SHLAA site 0835). We support the inclusion of this site in all four growth scenarios and consider that this highlights the important contribution the site makes towards achieving the housing target. It is a fundamental component of growth at suburban locations including villages and should remain in the Local Plan.

Likewise the SHMA of Nov 2015, the SHLAA of Feb 2017 and SA of March/April 2017 all need to be revisited; the SHMA in the context of new population projections and the proposed changes to the NPPF and PPG – including the Government's proposed calculation of Local Housing Need, the SHLAA to establish the status of those sites being promoted and if any others are now available, and the SA in the context of the findings of the new SHMA and chosen development strategy, in the light of all reasonable alternatives.

In the context of the above it is clear that the development options assessed in the 2017 SA all include 3,000 dwellings at Lodge Hill and none exceeded the housing requirement identified in the SHMA i.e. 29,463 dwellings. Things have moved on and these assumptions are now out of date.

As set out in our previous reps, if Medway Council look to progress a CiL charging schedule with a clear set of identified needs against which CiL payments can be made, a development strategy that integrates the planned expansion of Hoo, a network of small scale urban extensions to the main villages on the Peninsular and a reduced scale of development at Lodge Hill, could, in combination with some incremental suburban development in the less sensitive areas to the south and east (such as Strood and Rainham/Lower Rainham), and some town centre and riverside development, more than accommodate the Housing Needs of the area – i.e. could help meet the needs identified in the Government's proposed calculation of Local Housing Need.

Overall we believe that development on the Hoo Peninsular, including the development of the land at Walnut Tree Farm in High Halstow will help accommodate the Housing Needs of the area; that said development can come forward as part of a comprehensive suite of sites to supplement an extended Hoo St Werburgh, and if approved Lodge Hill; and that this would, through a CiL charging schedule with a clear set of identified needs against which CiL payments can be made, help address the service and infrastructure requirements of the Hoo Peninsula, including the public transport

requirements of the area; and provide for much need for family sized housing, affordable housing and starter homes without any adverse environmental or landscape impacts. Whilst all 4 development options proffered, provide for development in High Halstow, we believe Scenario 3 is that which the council should be aiming to achieve.

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?

Whilst we support the principle of affordable housing, we would question the rational for the proposed rural:urban split of 30%:25%.

It seems perverse to house people in rural areas that do not have good access to public transport when they are reliant on said transport services. Thus higher affordable provision may be better placed in the urban areas/ within areas identified for urban extensions, subject to viability/ other infrastructure requirements. As such we consider the level of provision will need to be justified in the Local Plan evidence base.

Question H4

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

Again whilst we support the provision of affordable rent and intermediate housing (in the form of shared ownership), the suggested split of 60% affordable rent and 40% intermediate at para 4.13 of the Reg 18 Local Plan should we consider be a target rather than mandatory and provide for some flexible split in provision, as whilst this ratio may be suitable at present as the plan ages and affordable housing legislation/ funding evolves, it could become an issue so needs to encompass flexibility to address the situation as it is on the site at the time the S106 is negotiated.

Question BE1

Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan?

What do you consider would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?

And

Question BE3

Does the proposed policy for housing design represent the most appropriate approach for the Medway Local Plan?

What do you consider would represent a sound alternative approach for housing design in the Medway Local Plan?

Whilst we support the approach to promoting high quality design set out in draft Policy BE1, and in terms of national standards, support an approach that compliance with Lifetime Homes and BFL12 “so far as practicable”; we would suggest that the plan looks to the Building Regulations and national standards rather than local standards – such as the Medway Housing Standards which do not always concur with national standards/ require elevated standards that are not justified. National government guidance is clear on the need to ensure polices comply with the national standards and we see no justification in the evidence base to deviate from this position.

In the context of the above we would like to highlight Redrow’s desire to work with Medway Council on the delivery of its chosen option and to this end would welcome the opportunity to meet with officers to discuss our proposals for the land at Walnut Tree Farm further, if this would be of assistance.

Yours sincerely

JUDITH ASHTON
Judith Ashton Associates

[Redacted Signature]



MEDWAY LOCAL PLAN

2012-2035

***DEVELOPMENT STRATEGY
CONSULTATION
RESPONSE***

June 2018
DHA/JAC/

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1 Introduction

1.1 Purpose of this Statement

- 1.1.1 These representations have been prepared on behalf of St Andrews Leisure Developments Ltd for their landholding at St. Andrews Lake and surrounding land at Halling.
- 1.1.2 The submission is made in respect of Medway Council's current Local Plan 'Development Strategy' Local Plan Consultation 2018.
- 1.1.3 Medway Council is in the process of preparing a new Local Plan to set out a strategy for development for the period 2012 to 2035 and is asking for views on 'Development Strategy' as a follow up to the 'Development Options' and 'Issues and Options' consultation that informed the early stages of the preparation of the plan. These representations are provided in order to aid the Council in the achievement of a sound replacement plan.
- 1.1.4 SALDL has an interest in land at St Andrews Lake Please see attached Plan 1.), which we consider represents a suitable and sustainable location to sensitively amend the settlement and Green Belt boundary for inclusion as a mixed commercial (tourism/leisure) and residential allocation. The site lies within the Green Belt, but is immediately adjacent to the large scale development undertaken by Redrow Homes at St Andrews Park.
- 1.1.5 The site contains a large lake that contains good quality clean water. The lake contains Carp and other freshwater fish species and has excellent water quality. The site is considered to have excellent potential to create a very high quality water sports centre as well as fishing and diving facility.
- 1.1.6 The appropriate development of the site will require extensive facilities to create a viable outdoor activities location and is considered ideal for the development of some "higher end" self contained tourism units on the land adjoining the lake as well as potentially on the lake edges in the form of chalets and house boats. This could create a high level tourism destination and 'gateway' to Medway.
- 1.1.7 Having carefully considered the appearance and role of the site in landscape terms, we consider that development can be accommodated without significant landscape impact. There is a clear break in the character of the site where the tops of the cliffs generally represent a transition to the countryside. It is considered that the lake itself and the immediate environs more closely relate to the built up area such that the removal of the lake, surroundings and cliff slopes from the Green Belt would not impact on openness.
- 1.1.8 These representations are focussed on how the site could assist in delivering the strategic objectives of the Council and how this would align itself with the emerging and updated strategy options. The response primarily focuses upon the notion that alongside 37,000 dwellings there will need to be a very significant boost to the local economy and a maximisation of the tourism and leisure potential of the LPA area. All opportunities will need to be identified and positive policies prepared to help to deliver them.

- 1.1.9 We also take this opportunity to reiterate why our client's land represents a suitable and sustainable site that should be included as an allocation (as set out above) as the plan progresses.

1.2 Document Structure

- 1.2.1 Chapter 2 provides feedback on the potential development options being considered by the Council as part of the current consultation.
- 1.2.2 Chapter 3 includes feedback on the more generic policy approaches, specifically in respect of how all economic development, including tourism and leisure opportunities must be identified and a positive policy base formed to maximise the contribution of such sites to the economy and health and well-being.
- 1.2.3 Chapter 4 promotes the development of sensitive Greenfield release at St Andrews Park for the delivery of a high quality tourism and Leisure destination with holiday homes and a quantum of residential development necessary to facilitate such delivery.

2 Comments on the Development Options

2.1 Vision and Strategic Objectives

2.1.1 We understand that the intended role of the Medway Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment.

2.1.2 The core plan objectives of the emerging Local Plan are broken down into four sub categories, which include the following:

'A place that works well'

- To boost the performance of the local economy by supporting local businesses to grow and attract inward investment through the provision of good quality employment land that meets the needs of businesses, and to secure and extend higher value employment opportunities;
- To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses;
- To ensure Medway's recognition as a University city and realise economic and place making opportunities associated with the learning cluster of higher and further education providers in Medway;
- To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services;
- To strengthen and develop the transport network providing safe and effective choices for travel, including management of the highways network, enhanced public transport systems, and improved opportunities for walking and cycling, with associated improvements in air quality.

'A riverside city connected to its natural surroundings'

- To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development.
- To address the challenges of climate change, seeking adaptations and opportunities to promote carbon reduction and mitigation measures, and reduce the risk of flooding;
- To ensure the effective management of natural resources, including water, air and soil, and the sustainable supply of minerals and appropriate management of waste.

'Medway recognised for its quality of life'

- To reduce inequalities in health by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public realm design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of local services and dementia friendly environments;
- To provide for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs;
- To strengthen the role of Medway's town, neighbourhood and village centres, securing a range of accessible services and facilities for local communities, and opportunities for homes and jobs, with Chatham providing the focus for new retail and community facilities.

'Ambitious in attracting investment and successful in place making'

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

2.1.3 These strategic objectives are as outlined within the previous 'Development Options' consultation in 2017.

2.1.4 We would therefore reiterate that we support the principle of all of the objectives and the foundations of the emerging plan. However, we would continue to strongly recommend that some modification is needed to ensure the plan is positively prepared and fully aligned with the provisions of both the current and emerging revised National Planning Policy Framework (NPPF). Part of this is ensuring that every opportunity is taken to review constraints to development to ensure the Council can deliver the jobs, services, leisure and tourism facilities and infrastructure to support a balanced growth of Medway.

2.1.5 Specifically, we consider objectives should be modified to provide more certainty that the scope to provide the full 37,000 home housing target will be fully explored if Medway is to secure its role as a vibrant city (rather than a collection of merged towns). Alongside this

we consider that the plan should be written in a way that seeks to maximise every sector of the economy to ensure that the delivery of inward investment and growth in daily spend within Medway keeps pace with the growth in population. In addition all opportunities should be taken to ensure that appropriate facilities are in place to support the river based tourism and leisure economy in order to ensure that existing opportunity sites are maximised in the interests of the economy and the health and well-being of the resident population.

2.2 Sustainable Development Options

- 2.2.1 Having regard to the options being considered, we understand the support for the promotion of brownfield land ahead of Greenfield sites. Nevertheless, given the known housing need, and the pending introduction of a standardised methodology that will raise this further, it is inevitable that substantial amounts of greenfield land will be needed. This should therefore take place in the most sustainable locations with the necessary capacity for growth. In addition and with respect to sites such as St Andrews Lake, it must be recognised that such opportunities are where they are. Careful consideration must be given to whether the site actually fulfils the roles and objectives of the Green Belt. Any contribution must be considered alongside the potential of the site to become a significant tourism and leisure destination and for its potential to contribute to the economy and to health and well-being.
- 2.2.2 Given St Andrews Park is sustainably located and is one of the most natural and sustainable locations to extend existing settlements, we advocate it as a development site to be delivered in the early years of the plan to ensure that the economy, tourism and leisure can keep pace with housing growth.
- 2.2.3 We consider the positive allocation of St Andrews Lake and surrounding land as identified on attached Plan 1 would help to ensure Medway meets the “key priorities” for Medway as set out at paragraph 2.12 of the consultation as well as the “joint Health and Wellbeing Strategy as set out in Para 2.14.
- 2.2.4 We consider “the vision to 2035 should be expanded to include the active promotion of all sectors of the economy as well as active promotion of healthy life-styles through the active promotion of sports and leisure facilities and destinations to maximise existing and potential opportunities.
- 2.2.5 Fundamental to whether the plan can be regarded as sustainable is consideration of whether the need for infrastructure, employment, services and community facilities will keep pace with housing delivery. We are concerned that instead of addressing some of the currently poor indices of deprivation, a plan that fails to properly plan for objectively assessed needs could serve to worsen some or many of the indices by not matching housing and infrastructure/community facility needs, including tourism and leisure, to population growth.
- 2.2.6 For the avoidance of doubt, we consider the options that should be considered should more accurately be presented as follows:
 - 1) Scenario 1 should consider how 37,000 homes and appropriate commensurate infrastructure and services can be achieved primarily by focussing housing on

brownfield urban sites, the development of a rural town on the Hoo peninsula and further but limited suburban expansions;

- 2) Scenario 2 presumably should takes a similar approach to scenario 1 and should consider how 37,000 homes and appropriate commensurate infrastructure and services could be delivered, but with a greater emphasis on infrastructure to support the delivery of the Hoo peninsula, a faster rate of delivery and reduced reliance on suburban sites;
- 3) Scenario 3 should focus on how 37,000 homes and appropriate commensurate infrastructure and services can be accommodated with greater emphasis on suburban growth;
- 4) Scenario 4 focus should factor in the potential for growth at Lodge Hill to accommodate the 37,000 homes.

2.2.7 In our view, the strategy options need refinement. Scenarios 1, 3 and 4 are much the same strategy, with the only variants being the housing target and the location of growth on the Hoo Peninsula. They are not therefore different or bespoke options and in our submission it will be necessary to combine all of the strategy “options” to meet the OAN and related development and social infrastructure needs. Given the lack of clarity, we respectfully suggest that Medway go back and review options in two key stages;

- 1) First, assess the level of growth that should be accommodated; 29,500, 31,000 or 37,000 homes; and
- 2) Then, establish the strategy options for meeting this growth and appropriate commensurate infrastructure and services and how such development would be disbursed.

3 Comments on the General Policy Approaches

3.1 Policy DS2

- 3.1.1 We consider that a positive policy for the specific development of the site at St Andrews Lake should be promoted. The site is a very attractive gateway site into Medway and represents a significant and substantial opportunity to create a high quality water sports and outdoor activities site with associated high quality self contained tourism accommodation.
- 3.1.2 The site offers the opportunity for the provision of sailing, wind surfing, paddle boarding, diving, rowing, fishing, ropes and high lines, open water swimming, triathlon and similar activities. Such activities in a safe, controlled environment can assist in the provision of training, certification and qualifications that will provide opportunities to maximise use of the Medway and estuary, while providing jobs and contribution to the local economy.
- 3.1.3 In our submission a positive site specific policy and Green Belt review is needed to make the most of this opportunity.

3.2 Policy H6 – Mobile Home Parks and Policy H7 – House Boats

- 3.2.1 These policies appear to ignore the significant potential of such facilities to contribute to the tourism and leisure economy. It is considered that a positive policy for the provision of tourism units, to include a range of provision, from mobile homes to chalets, to high quality contemporary units and houseboats should be provided.
- 3.2.2 This is necessary to help make the most of the tourism and leisure potential of Medway and to help raise the quality and range of tourism accommodation.

3.3 Policy E1 Economic Development

- 3.3.1 We consider that the policy fails to acknowledge the high importance and potential of tourism and leisure as a contributor to the economy of Medway.
- 3.3.2 Policy E1 fails to acknowledge the potential of tourism and leisure within Medway and fails to positively promote existing opportunities. This failure means that policy does not address all of the sectors that contribute to a diverse economy and means policy will not deliver adequate jobs for the expected population growth.

3.4 Policy E3 Tourism

- 3.4.1 Whereas housing and employment policies seek to identify specific sites, policy E3 fails to objectively assess potential tourism and leisure hubs. This is a missed opportunity and the plan should seek to identify and promote specific sites that have the potential to deliver a high quality tourism and leisure offer.
- 3.4.2 We submit that St.Andrews Lake is such a site and that Medway Council should promote a positive site specific policy that seeks to make the most of what is an obvious high quality opportunity.

- 3.4.3 We would ask that as a minimum the policy is amended to refer to “water” based rather than “marine” based tourism.

3.5 Policy E4 Visitor Accommodation

- 3.5.1 We support the policy but consider it could be expanded to make specific reference to opportunities such as St. Andrews Lake.
- 3.5.2 In particular, we request a review of the Green Belt boundary in this location, to ensure the potential of the site is not stifled due to the designation of the site as Green Belt.
- 3.5.3 We therefore ask for a careful Green Belt review to assess whether or not the site does actually serve the roles and objectives of the Green Belt.
- 3.5.4 It is our submission that it does not and that its retention within the Green belt will stifle one of Medway Council’s most significant tourism and leisure opportunities.
- 3.5.5 We ask the Council to consider a Green Belt review in view of the changed context of the site, and in view of its clear and obvious tourism and leisure potential and the importance of this for the community.

3.6 Policy NE6 Green Belt

- 3.6.1 We are concerned that notwithstanding the length of time since Green Belts were designated and notwithstanding the various changes in context and circumstances, the Council have not undertaken an objective assessment of whether the parts of the Council’s area that are currently Green Belt, continue to meet the roles and objectives of the Green Belt.
- 3.6.2 In our submission, each part of the Green Belt should be carefully assessed to determine whether it meets these tests. If not the site should be removed from the Green Belt; and if sustainably located should be positively promoted for development.
- 3.6.3 Medway Council are in a particular and specific predicament. Medway are an Authority with currently poor socio-demographic figures and yet they are expected to meet Government requirements of 37,000 new house-holds.
- 3.6.4 In order for Medway to not fail in the delivery of “matched” economic development, they must ensure that every opportunity is taken to deliver the jobs, health and lifestyle improvements that are necessary for Medway Council to deliver a sustainable and viable future.
- 3.6.5 In order to achieve this, any genuine opportunity for economic development that will encourage inward investment must be taken. In order to do so, a careful and objective assessment of the current Green Belt boundary is essential. A failure to do so is a failure to consider all genuine opportunities, and is likely to perpetuate and indeed exacerbate existing socio-demographic, health and lifestyle issues within Medway.
- 3.6.6 As part of this review we ask that the land at St Andrews Lake is carefully considered.

3.7 Policy HC1 Promoting Health & Wellbeing

- 3.7.1 We consider this policy vague and woolly. We consider Medway Council needs to consider all genuine and realistic opportunities to allocate and provide sites that can contribute to leisure, health and well-being and that the policy should be amended to refer to site specific opportunities such as St.Andrews Lakes.
- 3.7.2 A failure to do so is a failure to positively plan for the future of Medway and will result in a number of missed opportunities that will result in a mis-match of housing, jobs, leisure, and well being. This would not be a “sustainable plan”.

3.8 Policy I6 and I7 (g) Open Space and Sports Facilities

- 3.8.1 This draft policy fails to appropriately assess the potential of sites such as St.Andrews Lakes to make a positive and meaningful contribution to open space and leisure facilities.
- 3.8.2 Policies I6 and 17 should carefully assess the potential of sites to contribute to leisure, health and well-being within Medway. Positive site specific policies should be developed to ensure that sites such as St Andrews Lakes can be positively developed to their full potential.

Plan No. 1.



3.8.3



MEDWAY LOCAL PLAN

2012-2035

***DEVELOPMENT STRATEGY
CONSULTATION
RESPONSE***

June 2018
DHA/JAC/11276

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1 Introduction

1.1 Purpose of this Statement

- 1.1.1 These representations have been prepared on behalf of Heritage Design and Development Team Ltd (HDDTL) for their landholding at Manor Farm Frindsbury, in respect of Medway Council's current Local Plan 'Development Strategy' Local Plan Consultation 2018.
- 1.1.2 Medway Council is in the process of preparing a new Local Plan to set out a strategy for development for the period 2012 to 2035 and is asking for views on 'Development Strategy' as a follow up to the 'Development Options' and 'Issues and Options' consultation that informed the early stages of the preparation of the plan. These representations are provided in order to aid the Council in the achievement of a sound replacement plan.
- 1.1.3 HDDTL has an interest in land at Manor Farm, Frindsbury, which we consider represents a suitable and sustainable location to sensitively amend the settlement boundary for inclusion as a mixed residential and commercial (tourism/leisure) allocation. At the same time the allocation would assist in delivering enabling development to repair, restore and give a viable future to the Grade I Listed Building of Manor Farm while delivering a wedding/function leisure and tourism facility that would add to Medway's already impressive heritage trail. As a consequence HDDTL fully support the draft allocation.
- 1.1.4 These representations are focussed on how the site could assist in delivering the strategic objectives of the Council and how this would align itself with the emerging and updated strategy options. The response primarily focuses upon the four updated scenarios subject to consideration. However, we also take this opportunity to reiterate why our client's land represents a suitable and sustainable site that should continue to be included as an allocation (as set out above) as the plan progresses.

1.2 Document Structure

- 1.2.1 Chapter 2 provides feedback on the potential development options being considered by the Council as part of the current consultation.
- 1.2.2 Chapter 3 includes feedback on the more generic housing policy approaches.
- 1.2.3 Chapter 4 promotes the development of sensitive Greenfield release at Manor Farm, Frindsbury.

2 Comments on the Development Options

2.1 Vision and Strategic Objectives

2.1.1 We understand that the intended role of the Medway Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment.

2.1.2 The core plan objectives of the emerging Local Plan are broken down into four sub categories, which include the following:

'A place that works well'

- To boost the performance of the local economy by supporting local businesses to grow and attracting inward investment through the provision of good quality employment land that meets the needs of businesses, and to secure and extend higher value employment opportunities;
- To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses;
- To ensure Medway's recognition as a University city and realise economic and place making opportunities associated with the learning cluster of higher and further education providers in Medway;
- To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services;
- To strengthen and develop the transport network providing safe and effective choices for travel, including management of the highways network, enhanced public transport systems, and improved opportunities for walking and cycling, with associated improvements in air quality.

'A riverside city connected to its natural surroundings'

- To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development.
- To address the challenges of climate change, seeking adaptations and opportunities to promote carbon reduction and mitigation measures, and reduce the risk of flooding;
- To ensure the effective management of natural resources, including water, air and soil, and the sustainable supply of minerals and appropriate management of waste.

'Medway recognised for its quality of life'

- To reduce inequalities in health by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public realm

design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of local services and dementia friendly environments;

- To provide for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs;
- To strengthen the role of Medway's town, neighbourhood and village centres, securing a range of accessible services and facilities for local communities, and opportunities for homes and jobs, with Chatham providing the focus for new retail and community facilities.

'Ambitious in attracting investment and successful in place making'

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

2.1.3 These strategic objectives are as outlined within the previous 'Development Options' consultation in 2017.

2.1.4 We would therefore reiterate that we support the principle of all of the objectives and the foundations of the emerging plan. However, we would continue to suggest some minor modification is needed to ensure the plan is positively prepared and fully aligned with the provisions of both the current and emerging revised National Planning Policy Framework (NPPF).

2.1.5 Specifically, we consider objectives should be modified to provide more certainty that the scope to provide the full 37,000 home housing target will be fully explored if Medway is to secure its role as a vibrant city (rather than a collection of merged towns).

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

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

2.2 Sustainable Development Options

- 2.2.1 Having regard to the options being considered, we understand the support for the promotion of brownfield land ahead of Greenfield sites. Nevertheless, given the known housing need, and the pending introduction of a standardised methodology that will raise this further, it is inevitable that substantial amounts of greenfield land will be needed. This should therefore take place in the most sustainable locations with the necessary capacity for growth.
- 2.2.2 Given Manor Farm is one of the most natural and sustainable locations to extend existing settlements, and in view of the need for urgent repairs to the Grade I Listed Building, we advocate it as a development site to be delivered in the early years of the plan.

2.3 Development Scenarios

- 2.3.1 We note that the consultation document presents four development scenarios to meet the aims of the local plan, which are summarised below:

1. *Meeting the assessed housing need of 29,500 homes-*

Development scenario 1 seeks to meet the councils objectively assessed need of 29,500 homes across the plan period. This would focus housing on brownfield urban sites, but also involves the proposed development of a rural town on the Hoo peninsula and suburban expansion. This scenario does not include development of Lodge Hill. In line with the Councils analysis of the number of homes needed to support the area's population growth and change up to 2035. The broad distribution of development would be as follows:

- *Urban sites- 12,775 dwellings*
- *Hoo peninsula- 9,318 dwellings*
- *Suburban sites- 4,528 dwellings.*

2. *Investment in infrastructure to unlock growth-*

Development scenario 2 takes a similar approach to scenario 1 but with a greater emphasis placed on securing funding for infrastructure that would facilitate higher density of development on the hoo peninsula and a faster rate of delivery. This would reduce the need to release land in suburban locations and increase the overall supply of housing to 31,000 homes. The broad distribution of development would be as follows:

- *Urban sites- 12,775 dwellings;*
- *Hoo peninsula- 11,750 dwellings;*
- *Suburban sites- 3179 dwellings;*

3. *Meeting Governments target of local housing need of 37,000 homes-*

Development scenario 3 presents a strategy for growth that responds to the definition of local housing need by the government's proposed standard method, which calculate a need for 37,000 homes. This approach would be reliant on a greater amount of development in suburban locations. The broad distribution of development would be as follows:, higher density urban regeneration and a potential loss of employment sites.

- Urban sites- 14,194 dwellings;
- Hoo peninsula- 12,162 dwellings;
- Suburban sites- 6,276 dwellings.

4. Development of Lodge Hill SSSI

Development scenario 4 would use land at Lodge Hill- which is designated as a Site of Special Scientific Interest (SSI) - to create a new settlement on the hoo peninsula. 2,000 homes are proposed with supporting services, with the majority of land protected from development. This approach would reduce the need for suburban expansion and would provide funding for nature conservation projects

- Urban sites- 12,775 dwellings;
- Hoo peninsula- 10,357 dwellings;
- Suburban sites- 4,108 dwellings.

- 2.3.2 In considering the four options presented, we are concerned about confusion between targets and associated strategies. For example, to properly consider the effectiveness of a strategy a consistent benchmark is needed. Accordingly, the housing option for all four options should be the achievement of 37,000 new homes within the plan period. Thereafter, views should be sought on which planning strategy would best achieve the required 37,000 home target with the flexibility to rapidly respond to change.
- 2.3.3 Without the consistency, there is a genuine risk of selecting the right strategy with the wrong housing target or vice versa.
- 2.3.4 In addition, and fundamental to whether the plan can be regarded as sustainable there could be issues with failing to consider properly the need for infrastructure, employment, services and community facilities which will result in potential for issues arising due to lack of education, health provision, housing and jobs. We are concerned that instead of addressing some of the currently poor indices of deprivation, a plan that fails to properly plan for objectively assessed needs could serve to worsen some or many of the indices by not matching housing and infrastructure/community facility needs.
- 2.3.5 For the avoidance of doubt, we consider the options that should be considered should more accurately be presented as follows:
- .1. Scenario 1 should consider how 37,000 homes and appropriate commensurate infrastructure and services can be achieved primarily by focussing housing on brownfield urban sites, the development of a rural town on the Hoo peninsula and further but limited suburban expansions;
 - .2. Scenario 2 presumably should take a similar approach to scenario 1 and should consider how 37,000 homes and appropriate commensurate infrastructure and services could be delivered, but with a greater emphasis on infrastructure to support the delivery of the Hoo peninsula, a faster rate of delivery and reduced reliance on suburban sites;

- .3. Scenario 3 should focus on how 37,000 homes and appropriate commensurate infrastructure and services can be accommodated with greater emphasis on suburban growth;
 - .4. Scenario 4 focus should factor in the potential for growth at Lodge Hill to accommodate the 37,000 homes.
- 2.3.6 In our view, the strategy options need refinement. Scenarios 1, 3 and 4 are much the same strategy, with the only variants being the housing target and the location of growth on the Hoo Peninsula. They are not therefore different or bespoke options and in our submission it will be necessary to combine all of the strategy “options” to meet the OAN and related development and social infrastructure needs. Given the lack of clarity, we respectfully suggest that Medway go back and review options in two key stages;
- .1. First, assess the level of growth that should be accommodated; 29,500, 31,000 or 37,000 homes; Our submission is 37,000 homes) and
 - .2. Then, establish the strategy options for meeting this growth and appropriate commensurate infrastructure and services and how such development would be disbursed.
- 2.3.7 Notwithstanding that we consider further work is needed, we favour a strategy based upon an appropriate mix of urban and suburban sites and growth at Hoo. However, caution must also be had to the reliance upon the creation of a rural settlement on the Hoo peninsula, which would account for over a third of the councils proposed housing numbers. If this approach is to be followed, the level of urban and suburban sites must be significant enough to deliver constant delivery of housing whilst key planning principles and infrastructure is considered. Likewise, the Council continues to put too much emphasis on Lodge Hill despite the ongoing question marks over its suitability and delivery. It is sensible to include what is a very large brownfield site, but the plan requires sufficient flexibility to ensure it will not be undermined if the site is delayed.
- 2.3.8 We consider that Medway must prioritise the delivery of sites such as Manor Farm given the logical nature of the release of what is a sustainably located edge of settlement site.
- 2.3.9 Manor Farm has excellent access to services and facilities, as well as employment and targeting delivery in the early years would assist in giving time to deliver the infrastructure needed for the Hoo Peninsula major sites.
- 2.3.10 In summary, we strongly support the identification of Manor Farm as a housing allocation and undertake to continue to work with the Council to deliver it within the short term.

3 Comments on the General Policy Approaches

3.1 Housing Delivery and Mix

- 3.1.1 In line with the emerging updated NPPF, we consider the Local Plan should be based upon a housing target that reflects the Government's Standard Methodology for calculating housing need. The starting point should therefore be the achievement of 37,000 homes with sufficient flexibility to rapidly be able to respond to changes in circumstance.

3.2 Affordable Housing

- 3.2.1 We note that initial analysis indicates a percentage of 30% affordable housing in rural areas and 25% in urban Medway on residential developments over 15 units.
- 3.2.2 We support the inclusion of this as a formal threshold, subject to the policy containing sufficient flexibility to allow a departure where viability is likely to be undermined.

4 Promotion of Manor Farm, Strood

4.1 Overview

- 4.1.1 In line with the comments presented in sections 2 and 3 of this document, we consider that the site can deliver housing, tourism facilities and leisure and employment within a short space of time.

4.2 Overview of Allocation Sought

- 4.2.1 Detailed proposals have not been advanced albeit an initial masterplan has been prepared and significant initial work has been undertaken.

- 4.2.2 Key constraints are:

1. The setting of the Manor Farm Grade I Listed Building.
2. Existing trees and hedgerows
3. Public rights of way across the site
4. Relationship to existing properties

- 4.2.3 We have prepared an initial site layout that fits comfortably with these constraints and ensures a very appropriate retained setting for the LB. We consider that further detailed work is likely to demonstrate that development can be spread across a wider area with no material impact on the setting of the barn compared to the current situation.

- 4.2.4 Work is continuing in respect of supporting documents to support an Environmental Impact Assessment and this will be presented to the Council as the material emerges.



Illustrative plan for Manor Farm.

Implications of the NPPF

- 4.2.5 The introduction of the NPPF has significantly changed the context of the planning system, particularly in respect of the plan making process. Emphasis is now on local planning authorities to meet the full objectively assessed development needs of their housing market areas and, where possible, those of neighbouring areas (including the overspill/unmet need from London).
- 4.2.6 Whilst it is acknowledged that Medway is constrained, previous housing targets have fallen well short of the level of need required in the area. Consequently, with the NPPF in force it is now necessary for the Council to identify and meet its full requirements.
- 4.2.7 With all of the above in mind, we consider the most sound approach to plan making within Medway would be to maximise all opportunities to deliver sustainable development and to do so in a way that also maximises the tourism potential of sites and their potential to add to the local economy.
- 4.2.8 The masterplan is inspired by the desire to restore Manor Farm and to provide it with a viable future that makes a significant contribution to tourism and leisure within Medway.
- 4.2.9 The design ethos is to provide a residential-led urban extension, whilst creating a development that maintains a natural transition between town and countryside and respects the setting of the LB.

4.3 Generic Planning Issues

Sustainability

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

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

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

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

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

- 4.3.3 Provision of housing would help ensure that sufficient land of the right type is available in a sustainable location within the early phases of the emerging plan period. It would provide new homes in a location where people wish to live with excellent access to both town, countryside and essential day to day services.
- 4.3.4 The delivery of housing would also provide an economic benefit during and after build out. Construction jobs would be maintained or created, and household expenditure generated by future residents would support economic activity locally. Housing development would also enable the Council and local community to benefit from revenue linked to Section 106, CIL contributions and a New Homes Bonus.
- 4.3.5 From a social perspective, a suitably designed mix of both open market and affordable residential units would provide housing in a sustainable location that has been in short supply in recent years and that will therefore help see the needs of present and future generations being met.
- 4.3.6 Finally, we consider that in selecting sites for development the wider environmental quality of the authority area must be taken into account. From a visual perspective the concept masterplan presented with this submission is clear that a residential and open space led approach is advocated in order to provide an appropriate form of development and a transition between town and countryside. Likewise, opportunity exists to build upon existing ecological potential and to enhance the habitat for protected and non-protected species alike.
- 4.3.7 This particular current edge to Frindsbury is not particularly pleasing, with views of back gardens and an array of building types.
- 4.3.8 This proposal provides an opportunity to deliver a new and high quality edge to the settlement, publicly accessible open space, housing and jobs; while protecting the setting of the LB. The allocation would also enable the restoration of the LB and provide it with a viable future.
- 4.3.9 Having regard to paragraph 7 of the NPPF and core sustainability objectives, we consider the site is sustainable.

Access

- 4.3.10 In terms of vehicular access, the submission site benefits from different opportunities via the Frindsbury Hill, Parsonage Lane and the newly constructed access to the quarry.
- 4.3.11 Detailed assessment of these access points is being undertaken but initial findings are that safe and suitable access can be provided.

4.4 Deliverability

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

Availability

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

Suitability

- 4.4.4 For reasons set out in this statement the site is considered suitable for development. In summary, the site borders the currently defined town confines and would form a natural and logical extension and would provide a sustainable urban extension.
- 4.4.5 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

Achievability

- 4.4.6 There are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

Landscape Impact

- 4.4.7 It is acknowledged that the site is situated outside of the current built up area, within an area of locally valued landscape. However, there is clear potential for developing the site in a sensitive way that delivers a more sensitive transition between the hard and dense urban edge and the open countryside.

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

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

4.5 Summary and Conclusion

- 4.5.1 Taking all of the above matters into consideration we consider that there are no environmental barriers to new residential lead development on the site and that subject to careful and appropriate Master planning a high quality scheme can deliver a high number of dwellings and jobs while restoring and giving life to the Grade 1 Listed Building and respecting and preserving a suitable setting for it.



MEDWAY LOCAL PLAN

2012-2035

***DEVELOPMENT STRATEGY
CONSULTATION
RESPONSE***

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DHA/JAC/12170

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1 Introduction

1.1 Purpose of this Statement

- 1.1.1 These representations have been prepared on behalf of Shaftsbury Young People (SYP) for their landholding at Elm Avenue, Chattenden and at the AVC in respect of Medway Council's current Local Plan 'Development Strategy' Local Plan Consultation 2018.
- 1.1.2 Medway Council is in the process of preparing a new Local Plan to set out a strategy for development for the period 2012 to 2035 and is asking for views on 'Development Strategy' as a follow up to the 'Development Options' and 'Issues and Options' consultation that informed the early stages of the preparation of the plan. These representations are provided in order to aid the Council in the achievement of a sound replacement plan.
- 1.1.3 SYP has an interest in land at Elm Avenue, Chattenden, which we consider represents a suitable and sustainable location to sensitively amend the settlement boundary for inclusion as a residential allocation. At the same time the allocation would assist in delivering enabling development to implement a new direction for the Aretheusa Venture Centre. This will involve refurbishment of existing facilities as well as provision of new and reconfigured accommodation for vocational training and accommodation for young people in training. These facilities will be directed to young people not in education, employment or training (NEET's).
- 1.1.4 These representations are focussed on how the site at Elm Avenue will assist in delivering the strategic objectives of the Council and how this would align itself with the emerging and updated strategy options. The response primarily focuses upon the four updated scenarios subject to consideration. However, we also take this opportunity to reiterate why our client's land represents a suitable and sustainable site that should be included as an allocation (as set out above) as the plan progresses. At the same time we make submissions in respect of policies relating to the provision of community facilities, education, leisure and training.
- 1.1.5 The appropriate development of the Elm Avenue site will enable provision of extensive facilities to create a viable education and training and outdoor activities location at the AVC. This could create a high quality site to assist with delivery of 'alternative' education and training for a significant number of disadvantaged and disaffected young people as well as associated residential accommodation, life skills and employment.

1.2 Document Structure

- 1.2.1 Chapter 2 provides feedback on the potential development options being considered by the Council as part of the current consultation.
- 1.2.2 Chapter 3 includes feedback on the more generic housing policy approaches.
- 1.2.3 Chapter 4 promotes the development of sensitive Greenfield release at Elm Avenue and comments on other policies relating to the AVC.

2 Comments on the Development Options

2.1 Vision and Strategic Objectives

2.1.1 We understand that the intended role of the Medway Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment.

2.1.2 The core plan objectives of the emerging Local Plan are broken down into four sub categories, which include the following:

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- To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses;
- To ensure Medway's recognition as a University city and realise economic and place making opportunities associated with the learning cluster of higher and further education providers in Medway;
- To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services;
- To strengthen and develop the transport network providing safe and effective choices for travel, including management of the highways network, enhanced public transport systems, and improved opportunities for walking and cycling, with associated improvements in air quality.

'A riverside city connected to its natural surroundings'

- To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development.
- To address the challenges of climate change, seeking adaptations and opportunities to promote carbon reduction and mitigation measures, and reduce the risk of flooding;
- To ensure the effective management of natural resources, including water, air and soil, and the sustainable supply of minerals and appropriate management of waste.

'Medway recognised for its quality of life'

- To reduce inequalities in health by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public realm

design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of local services and dementia friendly environments;

- To provide for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs;
- To strengthen the role of Medway's town, neighbourhood and village centres, securing a range of accessible services and facilities for local communities, and opportunities for homes and jobs, with Chatham providing the focus for new retail and community facilities.

'Ambitious in attracting investment and successful in place making'

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

2.1.3 These strategic objectives are as outlined within the previous 'Development Options' consultation in 2017.

2.1.4 We would therefore reiterate that we support the principle of all of the objectives and the foundations of the emerging plan. However, we would continue to suggest some minor modification is needed to ensure the plan is positively prepared and fully aligned with the provisions of both the current and emerging revised National Planning Policy Framework (NPPF). We also consider amendments needed to ensure that training of disadvantaged and disaffected young people is prioritised, promoted and supported in view of the socio-demographic figures pertaining to Medway.

2.1.5 Specifically, we consider objectives should be modified to provide more certainty that the scope to provide the full 37,000 home housing target will be fully explored if Medway is to secure its role as a vibrant city (rather than a collection of merged towns). Alongside this support for SYP and the AVE is required, as is maximisation of other such opportunities and service providers.

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

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

2.2 Sustainable Development Options

2.2.1 Having regard to the options being considered, we understand the support for the promotion of brownfield land ahead of Greenfield sites. Nevertheless, given the known housing need, and the pending introduction of a standardised methodology that will raise this further, it is inevitable that substantial amounts of greenfield land will be needed. This should therefore take place in the most sustainable locations with the necessary capacity for growth.

2.2.2 Given Elm Avenue is one of the most natural and sustainable locations to extend existing settlements, we advocate it as a development site to be delivered in the early years of the plan.

2.3 Development Scenarios

2.3.1 We note that the consultation document presents four development scenarios to meet the aims of the local plan, which are summarised below:

1. Meeting the assessed housing need of 29,500 homes-

Development scenario 1 seeks to meet the councils objectively assessed need of 29,500 homes across the plan period. This would focus housing on brownfield urban sites, but also involves the proposed development of a rural town on the Hoo peninsula and suburban expansion. This scenario does not include development of Lodge Hill. In line with the Councils analysis of the number of homes needed to support the area's population growth and change up to 2035. The broad distribution of development would be as follows:

- Urban sites- 12,775 dwellings
- Hoo peninsula- 9,318 dwellings
- Suburban sites- 4,528 dwellings.

2. Investment in infrastructure to unlock growth-

Development scenario 2 takes a similar approach to scenario 1 but with a greater emphasis placed on securing funding for infrastructure that would facilitate higher density of development on the hoo peninsula and a faster rate of delivery. This would reduce the need to release land in suburban locations and increase the overall supply of housing to 31,000 homes. The broad distribution of development would be as follows:

- Urban sites- 12,775 dwellings;
- Hoo peninsula- 11,750 dwellings;
- Suburban sites- 3179 dwellings;

3. Meeting Governments target of local housing need of 37,000 homes-

Development scenario 3 presents a strategy for growth that responds to the definition of local housing need by the government's proposed standard method, which calculate a need for 37,000 homes. This approach would be reliant on a greater amount of development in suburban locations. The broad distribution of development would be as follows:, higher density urban regeneration and a potential loss of employment sites.

- Urban sites- 14,194 dwellings;
- Hoo peninsula- 12,162 dwellings;
- Suburban sites- 6,276 dwellings.

4. Development of Lodge Hill SSSI

Development scenario 4 would use land at Lodge Hill- which is designated as a Site of Special Scientific Interest (SSI) - to create a new settlement on the hoo peninsula. 2,000 homes are proposed with supporting services, with the majority of land protected from development. This approach would recue the need for suburban expansion and would provide funding for nature conservation projects

- Urban sites- 12,775 dwellings;
- Hoo peninsula- 10,357 dwellings;
- Suburban sites- 4,108 dwellings.

- 2.3.2 In considering the four options presented, we are concerned about confusion between targets and associated strategies. For example, to properly consider the effectiveness of a strategy a consistent benchmark is needed. Accordingly, the housing option for all four options should be the achievement of 37,000 new homes within the plan period. Thereafter, views should be sought on which planning strategy would best achieve the required 37,000 home target with the flexibility to rapidly respond to change.
- 2.3.3 Without the consistency, there is a genuine risk of selecting the right strategy with the wrong housing target or vice versa.
- 2.3.4 In addition, and fundamental to whether the plan can be regarded as sustainable there could be issues with failing to consider properly the need for infrastructure, employment, services, education and training, leisure and tourism and community facilities which will result in potential for issues arising due to a shortage of such facilities. We are concerned that instead of addressing some of the currently poor indices of deprivation, a plan that fails to properly plan for objectively assessed needs could serve to worsen some or many of the indices by not matching housing and infrastructure to community facility needs.
- 2.3.5 For the avoidance of doubt, we consider the options that should be considered should more accurately be presented as follows:
- .1. Scenario 1 should consider how 37,000 homes and appropriate commensurate infrastructure and services can be achieved primarily by focussing housing on brownfield urban sites, the development of a rural town on the Hoo peninsula and further but limited suburban expansions. Priority for these should be cases where these will be additional benefits arising from development of the site, such as would occur at the AVC should permission be granted;

- .2. Scenario 2 presumably should takes a similar approach to scenario 1 and should consider how 37,000 homes and appropriate commensurate infrastructure and services could be delivered, but with a greater emphasis on infrastructure to support the delivery of the Hoo peninsula, a faster rate of delivery and reduced reliance on suburban sites. Again we submit that priority for these should be cases where these will be additional benefits arising from development of the site, such as would occur at the AVC should permission be granted.
 - .3. Scenario 3 should focus on how 37,000 homes and appropriate commensurate infrastructure and services can be accommodated with greater emphasis on suburban growth; Priority for these should be cases where there will be additional benefits arising from development of the site, such as would occur at the AVC should permission be granted.
 - .4. Scenario 4 should factor in the potential for growth at Lodge Hill to accommodate the 37,000 homes.
- 2.3.6 In our view, the strategy options need refinement. Scenarios 1, 3 and 4 are much the same strategy, with the only variants being the housing target and the location of growth on the Hoo Peninsula. They are not therefore different or bespoke options and in our submission it will be necessary to combine all of the strategy “options” to meet the OAN and related development and social infrastructure needs. Given the lack of clarity, we respectfully suggest that Medway go back and review options in two key stages;
- .1. First, assess the level of growth that should be accommodated; 29,500, 31,000 or 37,000 homes; (we consider the full OAN of 37,000 should be pursued) and
 - .2. Then, establish the strategy options for meeting this growth and appropriate commensurate infrastructure and services and how such development would be provided.
- 2.3.7 Notwithstanding that we consider further work is needed, we favour a strategy based upon an appropriate mix of urban and suburban sites and growth at Hoo. However, caution must also be had to the reliance upon the creation of a rural settlement on the Hoo peninsula, which would account for over a third of the Council’s proposed housing numbers. If this approach is to be followed, the level of urban and suburban sites must be significant enough to deliver constant delivery of housing whilst key planning principles and infrastructure is considered. Likewise, the Council continues to put too much emphasis on Lodge Hill despite the ongoing question marks over its suitability and delivery. It is sensible to include what is a very large brownfield site, but the plan requires sufficient flexibility to ensure it will not be undermined if the site is delayed.
- 2.3.8 We consider that Medway must prioritise the delivery of sites such as Elm Avenue given the logical nature of the release of what is a sustainably located edge of settlement site.
- 2.3.9 The Elm Avenue site has good access to services and facilities, as well as employment and targeting delivery in the early years would assist in the short term deliver significant improvements to the AVC.

- 2.3.10 In summary, we strongly support the identification of Elm Avenue Chattenden as a housing allocation and undertake to continue to work with the Council to deliver it within the short term. Alongside this we ask that policies are prepared to encourage and enable the delivery of alternative education, leisure, training and accommodation at the AVC.

3 Comments on the General Policy Approaches

3.1 Housing Delivery and Mix

- 3.1.1 In line with the emerging updated NPPF, we consider the Local Plan should be based upon a housing target that reflects the Government's Standard Methodology for calculating housing need. The starting point should therefore be the achievement of 37,000 homes with sufficient flexibility to rapidly be able to respond to changes in circumstance.

3.2 Affordable Housing

- 3.2.1 We note that initial analysis indicates a percentage of 30% affordable housing in rural areas and 25% in urban Medway on residential developments over 15 units.
- 3.2.2 We support the inclusion of this as a formal threshold, subject to the policy containing sufficient flexibility to allow a departure where viability is likely to be undermined. We also request that accommodation for persons classified as NEETS is included in the definition of affordable housing.

3.3 Policy DS2

- 3.3.1 We consider that a positive policy for the support and specific promotion of the site at the AVC should be prepared. The site is a very prominent site in Medway and represents a significant and substantial opportunity to provide high quality alternative education and vocational training for disaffected and disadvantaged young people; as well as a water sports and outdoor activities site with associated high quality education, training and self contained accommodation.
- 3.3.2 The site offers the opportunity for the provision of sailing, wind surfing, paddle boarding, ropes and high lines, open water swimming, triathlon and similar activities. Such activities in a safe, controlled environment can assist in the provision of training, certification and qualifications that will provide opportunities to maximise use of the Medway and estuary, while providing jobs and contribution to the local economy. The development of vocational training for those NEET's and associated accommodation would sit alongside this.
- 3.3.3 In our submission a positive site specific policy is needed to make the most of this opportunity and we would welcome the opportunity to meet with Medway Council to discuss this.

3.4 Policy E1 Economic Development

- 3.4.1 We consider that the policy fails to acknowledge the high importance and potential of alternative education, training and leisure and tourism as a contributor to the economy in Medway.
- 3.4.2 Policy E1 fails to acknowledge the potential of education, training and leisure within Medway and fails to positively promote existing opportunities. This failure means that policy does not address all of the sectors that contribute to a diverse economy and means policy will not deliver adequate training and education, will not provide opportunity to the disadvantaged and disaffected young people of Medway, and will fail to deliver adequate

and suitable life skills experience and training for such individuals commensurate with existing needs and expected population growth.

3.5 Policy E3 Tourism

3.5.1 Whereas housing and employment policies seek to identify specific sites, policy E3 fails to objectively assess potential tourism and leisure hubs. This is a missed opportunity and the plan should seek to identify and promote specific sites that have the potential to deliver a high quality tourism and leisure offer.

3.5.2 We submit that the AVC is such a site and that Medway Council should promote a positive site specific policy that seeks to make the most of what is an obvious high quality opportunity.

3.6 Policy HC1 Promoting Health & Wellbeing

3.6.1 We consider this policy vague and woolly. We consider Medway Council needs to consider all genuine and realistic opportunities to allocate and provide sites that can contribute to life skills training, education, vocational training, leisure, health and well-being and that the policy should be amended to refer to site specific opportunities such as the AVC.

3.6.2 A failure to do so is a failure to positively plan for the future of Medway and will result in a number of missed opportunities that will result in a mis-match of training, life skills, housing jobs, leisure, and well being. This would not be a "sustainable plan".

3.6.3 We request the opportunity to discuss this with the Council asap.

3.7 Policy I6 and I7 (g) Open Space and Sports Facilities

3.7.1 This draft policy fails to appropriately assess the potential of sites such as the AVC to make a positive and meaningful contribution to open space and leisure facilities. In this respect there are plans to improve the Lower Upnor Riverside and the AVC also has plans to provide enhanced leisure and recreational facilities as part of provision of work experience alongside the vocational training that is intended to be delivered as part of reconfiguration of the AVC.

3.7.2 Policies I6 and I7 should carefully assess the potential of sites to contribute to leisure, health and well-being within Medway. Positive site specific policies should be developed to ensure that sites such as the AVC and other land owned by SYP can be positively developed to their full potential.

3.8 Policy I3 Education

3.8.1 It is considered that the policy should be expanded to refer to 'Alternative Education' provision as well as standard education provision. We consider that in view of the socio-demographic statistics for Medway, positive and specific policy for such provision should be included with Policy I3.

4 Promotion of Elm Avenue, Chattenden

4.1 Overview

- 4.1.1 In line with the comments presented in sections 2 and 3 of this document, we consider that the site can deliver housing while 'enabling' significant investment in the AVC.

4.2 Overview of Allocation Sought

- 4.2.1 An outline planning application is currently with the Council and is expected to be determined in the short term.
- 4.2.2 An illustrative site layout that fits comfortably with the site constraints has been submitted.

4.3 Generic Planning Issues

Sustainability

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

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

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

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

- 4.3.2 Development on this site would contribute to the achievement of sustainable development due to a series of economic, social and environmental benefits.
- 4.3.3 Provision of housing would help ensure that sufficient land of the right type is available in a sustainable location within the early phases of the emerging plan period. It would provide new homes in a location where people wish to live with good access to town, countryside and essential day to day services.
- 4.3.4 The delivery of housing would also provide an economic benefit during and after build out. Construction jobs would be maintained or created, and household expenditure generated by future residents would support economic activity locally. Housing development would also enable the Council and local community to benefit from revenue linked to Section 106,

CIL contributions and a New Homes Bonus. In this particular case considerable additional benefits will arise from the very substantial investment in the AVC.

- 4.3.5 From a social perspective, a suitably designed mix of both open market and affordable residential units would provide housing in a sustainable location that has been in short supply in recent years and that will therefore help see the needs of present and future generations being met.
- 4.3.6 Finally, we consider that in selecting sites for development the wider environmental quality of the authority area must be taken into account. From a visual perspective the illustrative masterplan presented with this submission shows that a residential and open space led approach is positive in order to provide an appropriate form of development and a transition between town and countryside. Likewise, opportunity exists to build upon existing ecological potential and to enhance the habitat for protected and non-protected species alike.
- 4.3.7 Having regard to paragraph 7 of the NPPF and core sustainability objectives, we consider the site is sustainable.

Access

- 4.3.8 In terms of vehicular access, the submission site benefits from access.
- 4.3.9 Detailed assessment of these access points has been undertaken and found acceptable by KCC Highways.

4.4 Deliverability

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

Availability

- 4.4.2 Availability is essentially about confirming that it is financially viable to develop and viability remains a central consideration throughout plan making and this is set out in the NPPF (Para 159).
- 4.4.3 We can confirm that, there are no financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the plan period. Indeed the development is expected to “enable” works for very substantial investment at the AVC and it is essential that this is undertaken in the short term.

Suitability

- 4.4.4 For reasons set out in this statement the site is considered suitable for development. In summary, the site borders the currently defined settlement confines and would form a natural and logical extension and would provide a sustainable urban extension.
- 4.4.5 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, noise, pollution or contamination.

Achievability

- 4.4.6 There are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

Landscape Impact

- 4.4.7 It is acknowledged that the site is situated outside of the current built up area. However, there is clear potential for developing the site in a sensitive way that delivers a sensitive transition between the hard urban edge and the open land beyond.

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

- 4.4.8 We consider that Heritage, Air Quality, Contamination, Noise, Flood Risk, Developability and Open Space are also issues that can be addressed as part of the planning application process.

4.5 Summary and Conclusion

- 4.5.1 Taking all of the above matters into consideration we consider that there are no environmental barriers to new residential lead development on the site at Elm Avenue.



The Woodland Trust
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NG31 6LL

Telephone

Email

22 June 2018

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

Dear Madam/Sir

Woodland Trust response to Medway's Development Strategy Consultation.

Thank you for the opportunity to comment on your Development Strategy.

About the Woodland Trust

The Woodland Trust is the UK's leading woodland conservation charity and aims to protect native woods, trees and their wildlife for the future. We do this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees. We own over 1,250 sites across UK covering over 23,500ha (from 0.06 to 4,875 ha), including 200 SSSIs, and we have around 500,000 supporters.

Detailed comments on the Development Strategy

Development at Lodge Hill

Chattenden Woods and Lodge Hill Site of Special Scientific Interest (SSSI) is a nationally important area of ancient woodland and rare grassland that supports one of the largest populations of nightingales in the UK.

Development that adversely affects this site would be contrary to environmental policies elsewhere in your Development Strategy. This site has been recognised as a natural capital asset in the nation's natural heritage, and should be protected and looked after for future generations.

The recent change in the revised NPPF states that "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons⁴⁹ and a suitable mitigation strategy exists".

As you demonstrate with the range of scenarios to meet your housing needs, there are no exceptional reasons to locate development on this site. Other locations/strategies are available.

Ancient woodland is irreplaceable, so any loss or damage will always constitute "Net Loss to Biodiversity", irrespective of any compensation, which is against the Government's policy as expressed in the 25 Year Plan for the Environment. Attempts at mitigation and compensation for other components of the SSSI are extremely high risk, and also likely to entail Net Loss.

The Woodland Trust therefore strongly objects to "Development Scenario 4: Consideration of development within Lodge Hill SSSI".

It isn't clear in "Development Scenario 1: Meeting the housing need of 29,500 homes" if the buffers mentioned in the description are sufficient to protect the environmental interest of Lodge Hill, including the ancient woodland. This also appears to be the case for scenarios 2 & 3 – see below.

Housing sites affecting ancient woodland

The maps for all scenarios show that Housing Site numbers 0050 and 1121 are adjacent to the boundary of Lodge Hill, with 1121 and two of the parcels of 0050 seeming to touch the ancient woodland boundaries. In line with Natural England's Standing Advice, a clear buffer of appropriate width should be shown (we suggest 50m), with a commitment in the site definitions and policy wording to ensure this will happen.

Scenarios 1 & 3 show Housing Site 0783c South enveloping one unnamed ancient woodland of 1.32 ha, and directly adjacent to North Dane Wood. The unnamed ancient woodland should be outside the development site boundary, and both woodlands have a clear 50m buffer.

Housing site 1113 is adjacent to Fishers Wood, again a clear buffer needs to be identified in the map or in policy wording.

Therefore, the Trust objects to the indicated boundaries of Housing Sites 0050, 1121, 0783c South and 1113. Clear buffer zones. The boundaries should be amended to show clear Buffer zones for the adjacent ancient woodland, and in the case of 0783c South to exclude the ancient woodland from the development site. I would also suggest that a layer for ancient woodland is added to the Designations Map.

"SECTION 7 NATURAL ENVIRONMENT AND GREEN BELT"

Ancient woodland, trees and Biodiversity

The Trust supports Medway's commitment to the protection of ancient woodland, trees, biodiversity, and Green Infrastructure in general, as particularly indicated in *Policy NE2: Conservation and Enhancement of the Natural Environment*, and *Policy NE5: Securing strong Green Infrastructure*. Nonetheless I have some suggestions that are intended to further the aims of your document.

I was pleased to read in Policy NE5 about your planning protection for ancient woodland, but due to the new stance in the latest NPPF, **I would ask that there is a new line clarifying that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons. I would also ask that a paragraph on buffers around ancient woodland is added in line with Natural England's Standing Advice, with a suggested distance of 50m as a precautionary principle. You may want to consider having a separate policy on ancient woodland and veteran trees for the above additions, and would recommend the following guidance on ancient woodland and veteran trees: *Planners' manual for ancient woodland and veteran trees* (Woodland Trust, 2017, www.woodlandtrust.org.uk/publications/2017/09/planning-for-ancient-woodland/).**

This manual covers a comprehensive range of issues relating to ancient woodland, veteran trees and planning. It is still possible to undertake high quality development that respects and responds to the precarious nature of our ancient woods and trees. The manual will help Medway to embed ancient woodland and aged and veteran trees into plan making and development management.

In policy NE2 you could bring in the topic of No Net Loss, and Net Gain, for biodiversity, in line with the Government's 25 Year Plan for the Environment. **Therefore I suggest you add a paragraph on Net Gain for Biodiversity, and include the following sentence: "Loss of irreplaceable habitats (such as ancient woodland and aged or veteran trees), will, by definition, always entail net loss."**

General comments on the many benefits of woodland, and a high canopy cover outside woodland.

There is a wealth of evidence on the many benefits of accessible woodland and high canopy cover, including improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity. This could be usefully summarised in the section dealing with Green Infrastructure. Most of these issues are referenced for the background research and evidence in the Trust's publication *Residential Development and Trees* www.woodlandtrust.org.uk/publications/2015/07/residential-developments-and-trees/

Therefore I suggest a new paragraph should be added somewhere within Section 7: "There is now a wealth of evidence on the many benefits of accessible woodland and high canopy cover, including improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity. The background research and evidence for this, along with guidance on the retention and planting of trees in new development, can be found in the report *Residential Development and Trees* published by the Woodland Trust"

I have expanded on some of the topics in *Residential Development and Trees* below, **and suggest you add this information, and the references, to bolster your existing text where appropriate.**

Flood risk

Trees can reduce the likelihood of surface water flooding in urban situations, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. There is a positive role here for the use of trees with SUDS initiatives. Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. (*Using green infrastructure to alleviate flood risk, Sustainable Cities* - www.sustainablecities.org.uk/water/surface-water/using-gi/). The Woodland Trust has also produced a policy paper illustrating the benefits of trees for urban flooding – *Trees in Our Towns – the role of trees and woods in managing urban water quality and quantity* (<https://www.woodlandtrust.org.uk/mediafile/100083915/Trees-in-our-towns.pdf>).

The Woodland Trust believes that trees and woodlands can also deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding and the water quality implications caused by extreme weather events. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publications *Stemming the flow – the role of trees and woods in flood protection* - <https://www.woodlandtrust.org.uk/publications/2014/05/stepping-the-flow/> and *Woodland actions for biodiversity and their role in water management* - <https://www.woodlandtrust.org.uk/mediafile/100263208/rr-wt-71014-woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf?cb=001108c3a78944299140a996b2cd7ee8>.

In addition, a joint Environment Agency/Forestry Commission publication *Woodland for Water: Woodland measures for meeting Water Framework objectives* states clearly that: 'There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives' (Environment Agency, July 2011-<http://www.forestry.gov.uk/fr/woodlandforwater>).

Air quality, urban heat islands, climate change and health

Trees and woodland improve air quality by adsorbing pollutants such as sulphur dioxide and ozone, intercepting harmful particulates from vehicle emission, smoke, pollen and dust and of course release oxygen through photosynthesis. This helps to reduce the occurrence of the problems caused by chronic respiratory disease. The British Lung Foundation suggests that one in every five people in the UK is affected by lung disease, more than 12 million people.

Research on the impact of installing a kerbside line of young birch trees demonstrated more than 50% reductions in measured Particulate Matter (PM) levels inside those houses screened by the temporary tree line. Electron microscopy analyses showed that leaf-captured PM is concentrated in agglomerations around leaf hairs and within the leaf microtopography. Furthermore, iron-rich, ultrafine, spherical particles, probably combustion-derived, were abundant on the leaf, noted these as a particular hazard to health. The researchers concluded that “the efficacy of roadside trees for mitigation of PM health hazard might be seriously underestimated in some current atmospheric models.”

This underlines that trees will have a proportionately greater effect in urban areas, where they are close to sources of pollution and nearer to people who might be affected.

The Woodland Trust has published a report on the importance of trees in urban green space in improving air quality, and considers species choice for new planting – see *Urban Air Quality*
<https://www.woodlandtrust.org.uk/mediafile/100083924/Urban-air-quality-report-v4-single-pages.pdf>

Furthermore, increasing tree cover in urban areas can help mitigate the ‘urban heat island effect’. This occurs in towns and cities as the buildings, concrete and other hard surfaces such as roads act as giant storage heaters, absorbing heat during the day and releasing it at night. The resultant effects can be dramatic; on some days there is a difference of as much as 10°C between London and its surrounding areas. Projections for our changing climate suggest this problem will get markedly worse.

The problem is exacerbated by a lack of green space. Natural green space, and trees in particular, provide both direct cooling from shade (protection from radiant heat and UV radiation) and reduce the ambient temperature through the cooling effect of evaporation and transpiration from the soil and plant leaves.

The impact on health of urban heat islands is two-fold; firstly, higher temperatures increase ground level ozone production exacerbating the symptoms of chronic respiratory conditions. Secondly prolonged high temperature can precipitate cardiovascular or respiratory failure or dehydration, particularly amongst the elderly, very young or chronically ill. In the 2003 summer heat wave more than 2,000 people died in Britain alone and more than 35,000 died across Europe.

Research at the University of Manchester using computer modelling has shown how increasing urban green space can mitigate urban heat island effect. Without any increase in green space, by 2050 the temperature in Manchester is projected to rise by 3°C. However, if the amount of green space increases by just 10% then the temperature rise in the city could potentially eliminate the effects of climate change on increasing surface temperatures. However, reducing tree cover by the same percentage could lead to an increase of 8.2°C under some scenarios.

I trust you can accommodate these suggested improvements, which support the overarching aims of your Development Strategy. Please get back to me if you have any queries on this, or require further clarification.

Yours sincerely,



Richard Barnes MCIEEM, CBiol, MRSB
Senior Conservation Adviser; External Affairs Officer

maryott, kyle

From: [REDACTED]
Sent: 22 June 2018 20:04
To: futuremedway
Subject: Hoo St Werburgh - Medway Council Local Plan Consultation
Importance: High
Categories: Blue Category

For the attention of:- Medway Council Planning Team

I write regarding the local development proposals being considered by Medway Council Planning. Having moved away from the Medway Towns in 1984 due to the Dockyard closure it became necessary to relocate back in 2008 in order to support care arrangements of my elderly parents. Following my return it became very clear that much development had taken place since my departure. In fact, the property I had left in 1984 had been redeveloped in having a bungalow built in what was my garden and it wasn't a large garden. In fact, in my view and that of the neighbours, it was a classic case of "over development"? Which is why I write with respect to this "Local Plan Consultation."

Since my return to Kent in 2008, my current home is the second residence I have occupied in Medway. The first one was a relatively new build, where a builder obtained a detached property and was granted 'Planning Approval' to re-develop the plot into five (5), five bed detached properties. After living there for seven (7) years it became very clear it was over developed, lacking in suitable infrastructure support, personal safety and development control. Hence the move necessary in 2015 to the 'Hoo Peninsula' to hopefully enjoy the safety of living in Kent, the Garden of England.

It would appear that further housing developments, especially on the 'Hoo Peninsula' would be detrimental to the character and sustainability of the existing farming "Garden of England" landscapes and natural wildlife. Having already experienced housing developments in Medway, the stress caused and how it affects lives in the location gives me **great cause for concern** with the Local Plans. Furthermore, after nearly three (3) years living on the Hoo Peninsula, it is very clear there's already inadequate infrastructure to support the existing residents. There have been excessive electrical interruptions/loss of supplies, poor drainage for both domestic waste and rain water, low water supplies, shortage of local/professional medical services, travel congestion and a lack of suitable safe parking.

The developments which are already taking place are clearly detrimental in this location. The visual impact is severe and are clearly detrimental to the surrounding area. The use thereof once complete will further invoke more road / travel congestion and the associated environmental impacts in an already contaminated air space.

It is very clear that further housing and industrial developments on the Hoo Peninsula would be extremely detrimental to the atmosphere and countryside appeal. Accordingly, **please, please save the environment, especially in Kent as "The Garden of England" on the Hoo Peninsula and Kent, NOT a building site.**

If you should wish to discuss further, please do not hesitate to contact me.

Yours sincerely.

[REDACTED]

Elgar D. CURLING

[REDACTED]



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Sent from [Mail](#) for Windows 10

maryott, kyle

From: [REDACTED]
Sent: 22 June 2018 20:36
To: futuremedway
Subject: Local plan for Hoo Peninsula

Categories: Blue Category

I've lived in this village for 50 years, (My Husband was born into this village, as were his father, Grandfather, Great grandfather) over the last 15 or so years I've watched it double if not triple in size.. without the correct infrastructure..... one road in one road out... one accident causes hours of delay, isolating the villages on the Peninsula.... The last upgrade to the sewerage works was undertaken in 1999/2000 and it was out of date before it was finished... throughout the years since its conclusion, the overflow of raw sewerage on to Four Elms Hill is disgusting and the smell is appalling and surely must break every H&S law ever written... The shortage of GP's Surgeries, Schools, poor internet connections, banks, even a dedicated Post office... the only one we have is in a supermarket.. our roads are jammed packed with cars half parked on pavements, hindering emergency vehicles access, and preventing wheelchairs users safe passage, even mums with buggies can't squeeze through.. twice this year Bells Lane has been closed due to subsidence, caused by underground springs.. both the developers and Medway council knew of this problem, but still allowed work to tunnel under Bells Lane to go ahead!!!! On both occasions we had to wait weeks for the road to be reinstated, causing everyone to divert about 2 miles .. But one subsidence on Mr Jarretts Ward, was repaired and reopened in a week... Double Standards!!! We are now to lose our Golf Course, through the total mis management by Medway Council... we have already lost enough, with the closing of BAE social club... football fields, cricket pitch, Swimming pool. I could go on and on.. But you already know all this...

My Grandson is just 12 so unable to object, but it is his life it will really affect... He is the 6th Generation of our family to have lived in this village. His ancestors came here back in the 1800's... to work the land.... soon there will be no more land to work... because Medway Council are now allowing building on every green field available, even fields that weren't available, namely Lodge Hill, could I remind you it's a SSSI site.. ancient woodland, Home to breeding Nightingales... How dare you even think of building on or near a SSSI.... How dare you allow building on prime agricultural land... How will we feed ourselves ? where will our sheep and cattle graze?

I sincerely hope you're not looking for votes out here come the next election, like you were at the last election... this little village was inundated with top notch Tories, promising us the Earth.. it was like the vicar of dibley. Yes yes yes yes...NO....

Signed
Disgusted Resident..
Mary Goodsell

Sent from my iPad

You are destroying beautiful farmland for unsustainable housing when there is brown field available throughout Medway. You have the cheek to have messages on the builders hoardings near Rochester Station that says "countryside, the place people love" well they way you are going there will be no countryside. A country park does not equal countryside.

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 10:29
To: futuremedway
Subject: Medway Council Local Plan - Response to Consultation

Categories: Blue Category

Consultation Response:

I recognise the need for houses to be built in Medway - however, a clear plan to improve health services, schools, roads and transport infrastructure must be at the forefront of any decision.

In addition, the negative impact on local rural communities on the Hoo Peninsula such as increased traffic / pollution levels must be considered. Further housing would be detrimental to the character and sustainability of our local landscape.

Regards

Sarah Edwards
[REDACTED]

Sent from my iPhone

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 10:49
To: futuremedway
Subject: deangate golf course closure

Categories: Blue Category

What a waste to close deangate. What will be next? The swimming pool or library? facilities in Hoo have declined so much over the years. We have already got too many houses. Parking is a problem but who cares .

Sent from [Mail](#) for Windows 10

From: [REDACTED]
Sent: 23 June 2018 11:16
To: futuremedway
Subject: Hoo St Werburgh future developments

Categories: Blue Category

Dear Sir / Madam

In regards to the future expansion and building plans in the Medway Towns, I would ask that when considering the building of addition residential properties in Hoo St Werburgh and surrounding area that you take into account the difficulty we are already experiencing in the village.

Large volumes of traffic using the A228 cause noise and air pollution. Breathing difficulties in those like myself with asthma. Difficulty with public transport not arriving on time or not at all. Children unable to get into local schools, doctors appointments difficult to get and with transport not timely getting to walk in clinics problematic especially with young children or elderly relatives.

Additional traffic when the new warehouse structure are operation will put addition pressure on the A228 and local facilities.

I understand that you need to build more houses but would ask that the facilities and infrastructure is in place before commencement and not after.

Yours faithfully

Elizabeth Winter

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 11:57
To: policy, planning
Categories: Blue Category

Planing permission Hoo Peninsula
I totally object to the council proposals
In regards to the regeneration or the above
Where in the consultation document is any mention of rail transport
Bus , supermarkets , doctors
Schools etc
If you want go bid 30,000
New homes where are all these people
Go to school, shop , etc
I live in the Hoo Peninsula
I have to travel by bus to my nearest supermarket
Which is about 5 miles away
Thank you

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 12:07
To: futuremedway
Subject: Housing.

Categories: Blue Category

Dear sir/ madam

I have lived in my present house for 56yrs which up to now has been very pleasant ,but what's going on now troubles me it is becoming over populated and this can only bring problems from all angles .

Please stop this ASAP.

Yours Sincerely

V mortley Mr

Sent from my iPad

From: [REDACTED]
Sent: 23 June 2018 12:08
To: futuremedway
Subject: House building without infrastructure

Categories: Blue Category

Response to further house building in Hoo or any part of the Peninsula

I have lived in Hoo since July 2014 and not by choice. I am an ex Londoner and moved to Kent in May 1988 hoping for a better future for my children, 2009 I moved to Gillingham where everything went pear shaped for me and I became homeless and this is where I have been given a small flat, in what feels like the back of beyond. So glad I can Drive. They called it Kent Home Choice - 'the word Choice', should be deleted as it is not a choice, you bid and hope.

Hoo St Werburgh is way off the beaten track, with little to no transport links off of the Peninsula. There is one/two buses per hour being the 191 into Chatham and back.

Needed to be in London for 9am one morning and found that the bus did not run early enough to catch a train from Strood Station, I had to add £10 to my journey for a taxi to the station in order to catch my train. Then upon my return the next bus to Hoo was not for another hour this was only 7pm on a weekday. I therefore added another £10 to my journey for a taxi home. I now do not go to London by public transport.

I do not know how people have managed or is this why the unemployment is high and the young have no incentive to do well unless they are looking to leave the area.

I have also not changed my Gillingham Doctors as there is only two doctors surgery in the area, they are aware that I live in Hoo.

Also there is no supermarket anywhere on the Hoo, people have to go into Strood or shop online. For those who do not drive will of course need to allow for taxi back to Hoo.

It is not an area for the young as there is no entertainment for them only a park so teenagers go into Chatham, Rochester or Strood relying on parent for taxi service back home - in some cases both ways.

There is only one Senior School unless they get into a Grammar school.

Since I was placed in this area I have seen New Housing built in Bells Lane and an extremely large housing complex built on Chattendeau. All these people need services that they can access without the need to drive. Nearest station Strood - buses one or two an hour none of which will enable a person to catch an early train. Nearest supermarket is Strood, again for those who do not drive add £10 taxi home.

There are no new Medical practices. No early or late transport links. A TRAM would be an ideal link to Strood. It has done wonders for the people of Addington, Croydon.

A new Primary and Senior School is needed and a Supermarket somewhere on the Peninsula too with good bus links serving all of the Peninsula.

Tescos in Orpington town centre - built housing which is near to the train station, on the edge of town centre and upgraded the Hall which is hired for event. This was not all funded by Bromley but also by Tescos, even the town centre paving/road got an upgrade.

There is a disused rail line which runs upto Grain this could be turned into a tram link - not all of Croydon's trams were built on unused land, an old disused rail link between Croydon and Beckenham was upgraded to take the Tram.

Hoo St Werburgh may have land but has NO Infrastructure to serve a community.

Is Medway Council planning to build flats just to dump people who do not work and those that are retired which they believe serve no more purpose to life.

Deangate Ridge is not the solution - its a Golf Course which serves more than just Hoo. It is also Green and good for the environment.

Patricia Dyer

now retired, from an era where people were taught to work, raise their family, paid taxes and National Insurance, with parents that fought for their country.

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 12:35
To: futuremedway
Cc: A V C
Subject: Building plans

Categories: Blue Category

The Planning Team,

Today I have received a letter from my M.P., confirming what many people believe, that you plan to swamp the area of Hoo St. Werburgh with a large amount of housing. This would obviously ruin the basic structure and spirit of the area.

The Medway Council has gone about these plans in what I consider to be a very underhand manner. At times their statements and actions have bordered on lies.

I have voted for the Conservative party my whole voting life, but am beginning to believe that this country is not safe in their hands.

In view of my comments above you will understand that I am against the proposals.

Yours faithfully
A. V. Chandler

Sent from my iPad

From: [REDACTED]
Sent: 23 June 2018 12:45
To: futuremedway
Subject: Local plan consultation response

Categories: Blue Category

Dear Sir / Madam,

I am writing to express my concern of the current plan. It seems that all that is being considered is the building of houses on the Hoo peninsula, particularly around Hoo itself. There seems to be no serious consideration to Doctors, Schools, Roads, Pollution levels, water supply and sewerage. It is almost impossible to get a doctors appointment now, let alone if more people live in the area. The Medway hospital is overloaded already and in and out of "special measures" on a regular basis. The current development on the site of the old ge avionics club is already a step to far, the shady dealings that happen to secure these areas of land would be more at home in a dictatorship.

The way the deangate ridge golf club was deliberately run down to make it unprofitable is a disgrace. A similar thing is currently happening at the Hoo swimming pool. I would like to see a public inquiry into the suggested developments, and if necessary to be followed by a criminal one.

As a resident of the Hoo peninsula, I do feel this is being forced upon us. If the infrastructure was in place to support these developments I would not mind but all that generally happens is a payment for things like lowering pavements, painting white lines, etc. I want to see more doctors, better roads and more Police. In the last year there has been more than one occasion where I have not been able to get off, or back on tho the peninsula, and all because of a vehicle collision.

Spend the money where it is really needed, whatever happened to developing real "brown field sites".

regards

Roy Croucher

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 12:46
To: futuremedway
Subject: Hoo st Werburgh expansion

Categories: Blue Category

Dear sir/ madam, I am writing to express my outrage at the continued efforts of Medway council to expand the village of Hoo St Werburgh, I continue to see plans that look like a great effort is being made to join Hoo to Chattenden and Chattenden to Wlmscott. The current infrastructure cannot cope now let alone in the future, we moved to the village to be in a village location not in a massive town. I am disgusted with the way the golf course has been closed because you've decided it would be great for houses. no concern seems to be given for conserving any green lands, they are just seen as the next building site. I am sure you would object if this was happening in your door step.

Please respond to my complaint,

Yours faithfully, matt cheese

Sent from my iPad

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 13:05
To: futuremedway
Subject: Compliant

Categories: Blue Category

Compliant about Medway's Rochester Airport Run ways

We myself, that is; as well as others wish for this budget of £4.1m pounds not to be wasted on this ridicules airport run way idea We need money spent on people like yourselves and as all

Daren Terry

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 13:11
To: futuremedway
Subject: Medway Council's Planning Team

Categories: Blue Category

We realise that new houses are required and have no objection to a controllable number. At the present time it is difficult to get a doctor's appointment having to queue from 8 a.m. hoping to get one for the same day (not guaranteed).

How many pupils can the local school accommodate?

Better police/traffic wardens enforcing traffic laws etc would help.

Traffic on and off the Peninsular is getting horrendous (one accident either side of Four Elms Hill bring every thing to a stand still as with bad weather with only one way in and one way out, so with more houses, more transport. The number of large lorries going through the village to the industrial estate at the end of Vicarage Lane is increasing seems like weekly and with the camber in the road at the top of Vicarage Lane can be dangerous with them veering across to the opposite lane.

Regards

Dave & Jackie Buss

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 13:43
To: futuremedway
Subject: Comments on development plan

Categories: Blue Category

Regarding T4

I do not feel that the development of Rochester airport is cost effective. This will cost many millions that could be spent on projects that will benefit a greater number of residents (see below). The development of the airport will only benefit a small number of people many of whom are not Medway residents.

The airport could be developed into a historical site focusing on its use during Ww2 which would bring income into Medway. Two hotels are already close to the site for tourists to stay in who may be visiting the dockyard and Rochester. The airport could then provide another attraction to encourage them to remain longer and spend money in the local area.

The money saved from the development of the airport could then be spent on services to benefit the Medway population such as a new hospital or care facilities. Some of the airport site could be used for this use. With an increased population, as predicted by your reports, additional hospital facilities will be needed. The current site which Medway hospital occupies has limited area for further development and is difficult to access from many parts of Medway. The airport site is very close to the motorway making it easier to access and the air ambulance is on site.

Brenda Wood

[REDACTED]
Sent from my iPad

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 14:18
To: futuremedway
Cc: [REDACTED]
Subject: Hoo Peninsula local plan

Categories: Blue Category

Dear Sir (Planning Inspector)

I write to advise you of my support of Kelly Tolhurst MP's views regarding the fight against plans that are not sustainable and to the detriment of the environment of the Hoo Peninsula, Yours sincerely Ron Bewsey

Sent from my iPad

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 14:47
To: futuremedway
Subject: Hoo consultation

Categories: Blue Category

I would like to object to anymore houses being built in Hoo. When we moved here over 15 years ago it was a lovely quiet village just what we were looking for. We were able to get a doctors appointment the same day and village life was wonderful. Fast forward 15 years and we are lucky if a doctors appointment is available within 15 days sometimes longer. You say you are building affordable houses would you inform me where. I class affordable as £50,000 or less, none of the houses being built in Hoo are that price. Who is benefitting from these planning applications somebody is having their pockets lined at our expense. Everybody keep banging on about saving the planet that will never happen if you keep taking away habitat. We used to have an abundance of wild birds, hedgehogs and foxes in this area they have all gone because somebody is suffering from greed. This is a village community don't turn it into a concrete jungle, if that is what you want perhaps you would be better off moving your planners to London Sent from my iPad

From: [REDACTED]
Sent: 23 June 2018 15:04
To: futuremedway
Subject: Development Strategy Consultation

Categories: Blue Category

'Dear Sirs,

We are residents of Hoo St Werburgh and are responding to your development proposals.

We strongly oppose Scenario 4 which includes building on the Lodge Hill,site.

We support elements of scenario 1, particularly building on brownfield sites. We also support elements of Scenario 2, including building the necessary infrastructure in Hoo to cope with the enormous influx of new housing in recent years. Over the last 2 years our ability to book an appointment with a doctor has vastly decreased, traffic has increased and parking in the village centre has become more difficult. We completely appreciate the need for new housing, and are not wholly against it, we just propose that the right infrastructure needs to be in place first. We disagree that Capstone Park and Rainham should be spared from any housing plans all the while areas such as Lodge Hill are still under threat. Scenario 3 has its merits in attempting to spread the housing need more broadly. However, this could be a very costly exercise and we would only consider this option as viable once funding was in place.

So, our responses

Option 1. Yes to building on brownfield sites and regenerating the riverfront

Option 2. Yes to building infrastructure needed before any more new homes are built.

(As a case in point, there is a new development at the top of Bells Lane which will contain 153 houses. The closest doctors surgery is St Werburghs Medical Practice. They are already oversubscribed, where will these new people go? There should be no more building until another doctors surgery is up and running and can take on these new people).

3. Yes, everywhere should be considered for development but thought through carefully, giving great consideration to environmental factors, infrastructure and funding.

4. No to building on Lodge Hill.

We are exceedingly unhappy that we were only made aware of this consultation on Friday 22nd June, with the closing date of Monday 25th June. This has given the people of Hoo very little time to respond. This is extremely unfair as these plans directly affect us, many of whom are elderly and may not have access to the Internet. You should have ensured that all residents were made aware of this consultation sooner. We do not recall receiving any notification of this consultation. You should be aware that as the residents were not made aware sooner, and may miss the deadline for having their say, the response rate may appear biased toward Hoo residents not objecting to these proposals. Thus, the results will be a false representation of the views of Hoo residents.

Yours faithfully,

Louise, Janet and Robert Ellis said

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 16:39
To: futuremedway
Subject: Hoo Planning

Categories: Blue Category

Dear Sir

I wish to express my concern about the planning of more houses on the Peninsular - especially in Hoo-St-Werburgh.

I have been living in Hoo for 10 years and have seen the village and surrounding area steadily growing with the building of new houses.

I understand the need for more houses - but it also requires the extra infrastructure to support the extra population the houses will attract.

One of my main concerns is Four Elms Hill, which becomes clogged during rush hours or if there are traffic problems further down the road. I do not think the only road leading off the Peninsular is adequate and it could cause further congestion and delays.

In addition, you would need to ensure there are sufficient health services etc to accommodate the extra population.

The Peninsular has some beautiful areas for walking but as building continues, these are being lost and the surrounding area is becoming more concrete and ugly.

I hope you will consider and value my concerns.

Thank you

Sarah Meredith

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 16:47
To: futuremedway
Subject: Rochester Airport Masterplan - Update

Categories: Blue Category

As a local resident I am concerned of the impacts on safety of the updated proposal. As with the previous proposal, it was deemed that a full safety assessment was required. Reducing the operations to one runway will have an impact on safety and noise and therefore Medway Council and Rochester Airport have an obligation to safeguard the safety of residents and keep noise to no more than current levels.

Therefore a full and comprehensive safety and noise assessment must be undertaken with the updated proposal. Medway Council must consider an alternative approach for aviation in Medway using an area that is not so heavily built up and populated and where no schools will be impacted by safety.

Mr M.Fowler

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 17:14
To: futuremedway
Subject: Hoo houses

Categories: Blue Category

Not only are you bent on ruining what used to be a nice village. You now seem to be focused on lining you own pockets at the expense of the community. Clearly you have no concept of how a community works, maybe your bonus at the end of the year has blinded you to this. You cannot build the volume of houses that you propose without providing the relevant services to support it. There is one road into Grain / Hoo that is totally inadequate at present, how do you propose to cater for the extra traffic? During the last winter the road was closed due to snow and ice. Nobody could get to Hoo or Grain. Totally unacceptable you bunch of ill-educated morons.

Sent from my iPad

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 17:18
To: futuremedway
Subject: Dean gate Ridge

Categories: Blue Category

Hope that you are able to line your own pockets sufficiently to boost your retirement funds, thanks for shafting the community, wan###s

Sent from my iPad

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 17:20
To: futuremedway
Subject: Dean gate golf course

Categories: Blue Category

Obviously you don't play golf. A profitable solution was proposed to you but you decided to line your own pockets instead. Shame on you Ass####s

Sent from my iPad

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 17:15
To: futuremedway
Subject: Development Strategy document.

Categories: Blue Category

Why is Medway Council ,once again , being devious and giving its constituents so little time and opportunity to respond to their irresponsible ideas ? Once again no consideration has been given to local safety, noise pollution and insufficient infrastructure to support ideas . Who has approved the closure of the cross runway which will make it extremely dangerous for local residents, the wider area and those who use it? Will there never be any consideration to safety issues by this council ?

Once again the safety and careful planning for sensible and economic local improvements are being totally disregarded the local council. Consideration to building a new hospital and improving other social amenities for local residents so that we do not have to continually hear ,via the media, how poor they are in Medway ,would be preferable.

John and Jackie Cooper [REDACTED]

Sent from my iPad

From: [REDACTED]
Sent: 23 June 2018 17:21
To: futuremedway
Subject: Medway Local Plan

Categories: Blue Category

MEDWAY LOCAL PLAN - OBJECTION

1. Extra houses are needed in Medway, but every community in Medway must take its share.
2. But I do NOT accept that Medway can accommodate 27,000 more houses between 2017 and 2035. The Council MUST show that they are doing everything possible to get government to agree that this is unsustainable for Medway as per Kelly Tolhurst's letter to the residents of Hoo
3. I think that 10-12,000 extra houses on the Peninsula is FAR too many. That would destroy everything that makes the Peninsula special. There are large areas of grade 1 farming land on the Hoo Peninsula. The proposed housing developments will destroy this. Most of the land is also ALLI designated. With all of the predatory building projects in and around the parish which amount to over 820 extra dwellings I feel we have done more than our fair share of housing contribution with very little improvement done to local facilities.
4. The Council admits the number of people in Medway is not increasing as fast as it was - so I ask the Council to recalculate and reduce the total number of houses it needs
5. It is impossible to tell from the consultation what number of houses are allocated where on the Peninsula, so I would like the Council to work with the Parish Councils on a 'masterplan' to include in the Local Plan, before any more housing applications get passed, so it can be agreed what houses, transport infrastructure (including public transport), doctors, schools, and shops are needed, where and when. The Council must pledge an end to piecemeal development here until that masterplan is in place.
6. The masterplan should consider the people who already live here, so that new housing fits in with our lives and our communities and doesn't ruin people's lives. The traditional way of rural life will be altered forever. This is forcing thousands of residents to live in a town against their will.
7. I think the Council hasn't explored several key options that are essential. For example, the Council should consider attractive developments at Capstone and Rainham. The Council should also consider redevelopment of Chatham town centre with housing options. These must be on the table, not just dismissed.
8. Medway Council must share with the people the plans they have for the roads and railways on the Peninsula, and for tackling air pollution. If the Council already has bids in for funding, there must be plans already, and we should see them.
9. The Local Plan must have more detail about the future of hospitals in Medway. It must include a timeline and possible locations.
10. We want the Council not to sacrifice protected places, such as Lodge Hill SSSI. Protected places should be Medway's trump card against unsustainable development

11) Local residents were not consulted on the destruction of their village. Their concerns about the piecemeal development around the village have been ignored. The council continue to ignore concerns about underground springs and similar surface water problems. Putting housing on the upper slopes are almost bound to cause problems in the village centre and around the church with soakaways filling up etc. This is against government guidelines.

12) With all of the predatory building projects in and around the parish which amount to over 820 extra dwellings I feel we have done more than our fair share of housing contribution with very little improvement done to local facilities.

Hoo Peninsula Parish Councils are willing to work with Medway Council in a constructive dialogue. Medway Council should willingly work with them.

Sincerely

Fiona Bradley

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 17:45
To: futuremedway
Subject: Hoo village

Categories: Blue Category

I object most strongly regarding the over development of Hoo. Despite all the protests from residents all of our green land is being taken for even more houses. No thought seems to have been given to the rest of the infrastructure. Doctors and schools are already suffering. Hoo is no longer a village but cannot be referred to as a town as there are not enough facilities to accommodate so many people.

I am quite sure no notice will be taken of my or anyone else's objections but I feel obliged to make them and voice my dissatisfaction with Council plans.

Valerie Dyer

Sent from my iPad

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 18:05
To: futuremedway
Subject: Future Housing on the Hoo Peninsula.

Categories: Blue Category

My wife and myself are appalled at the decimation you are prepared to inflict on the residents of the Hoo Peninsular, with the majority of the housing centered around Hoo St Werburgh village. The residents of Hoo St Werburgh have voiced their disapproval of this plan at every meeting that has been held in the village.

The proposed plan does not take into consideration the fact that there is not sufficient infrastructure to support more growth, medical facilities locally are falling apart, the school is over crowded, recreational facilities have not been improved for over 30 years. In that time the village has grown to the point where it cannot take more growth and. The final point that should be given priority is the fact that the TOP OF FOUR ELMS HILL has one of the highest pollution levels in the Medway Towns, which is poisoning the residents who live on the peninsular at present without adding any further traffic to the area.

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 20:04
To: futuremedway
Categories: Blue Category

I do not agree with new builds with the current infrastructure as it is.

Regards

Yours sincerely

Mrs Jo Goddard
Service Manager in Cardiology
Work Mobile: [REDACTED]

From: [REDACTED]
Sent: 23 June 2018 20:41
To: futuremedway
Subject: Fwd: Medway Local Plan Consultation

Categories: Blue Category

Comments for Medway Council's Draft Local Plan-Sustainability

We have live in what is now called Medway since 1974 originally in Lordswood and have seen the area being swallowed up by new housing estates. Having now moved out to the Peninsula wanting a quiet rural lifestyle , 'regeneration' now wants to destroy these villages by developing any spare piece of land available.

What is not taken into account is the poor infrastructure that simply cannot take that amount of extra vehicles etc. My information is that the Hoo Parish Council has never been consulted on the proposed railway station, widening of the A228, the application for funding for infrastructure, nor, for that matter on the removal of many sports facilities around Hoo.

The council has ambitions of being a city so why create a dormitory town surrounding a village, separated from all facilities on the other side of the river and spend millions of pounds on transport solutions to warrant this

.

Medway Council plans to widen the A228 running through the heart of the proposed new town thus acknowledging that there would be a huge increase in road traffic. This is already a 4 lane dual carriageway. Is there an up-to-date traffic impact assessment of the large warehousing at Kingsnorth, the existing industrial estate at Kingsnorth and possible further industrial use of the site of Kingsnorth Power Station, the quarry, proposed expansion of facilities at Thamesport and other commercial uses at Grain? These assessments should be combined with all of the new housing developments on the Peninsula that have got planning permission based on each one having a minimal impact on the existing road layout. Would all of this spread the unacceptable pollution problem currently experienced on Four Elms Hill?

At present there is one road from Four Elms through to Grain. Traffic incidents are occurring every week causing massive disruption to people on the Peninsula. Hoo village has suffered badly over the last few months because of road issues from the latest Bellway development in Bell's

Lane, proving that the road infrastructure is not strong enough for extra traffic .

Sewers are unable to cope with the present numbers and yet more planning applications are being passed without sorting out these basic issues first.

We all know housing shortage is a major issue, but by building on the Peninsula we would only be providing housing for the overspill of London and not helping the people of Medway.

Why not use those empty properties within the town centres or instead of having empty office/warehouses convert these into apartments -people will be already in the towns and perhaps reduce such a large call for cars and public transport.

Why destroy a green space (Deangate Golf Course) to put another 'sports centre' - would this be another private gym club thus ruining Medway Council leisure centres, or yet another trampolining site (another current craze). The golf course could remain and the old small gym site could have been refurbished and incentivised to bring in the extra income.

Regards

Malcolm Mason

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 21:02
To: futuremedway
Cc: [REDACTED]
Subject: Ref plans for development on the Hoo Peninsula

Categories: Blue Category

Dear Sirs

I am writing to you in response for development of the Hoo Peninsula and the surrounding area.

I have lived here for 37 years and have steadily seen the area become more and more built up to the point where Hoo has already lost much of its original charm and character.

I have witnessed how the village has become transformed from a small village where people knew each other and looked out for each other to a place where people no longer do this.

However the most troubling aspect of the development which I have witnessed is the lack of space for vehicles and the cramped nature to the development which has already taken place.

We live on the Main Road opposite the Hundred of Hoo and even before the addition of the new Primary school being built on the field (which was fenced off without consultation by the Hundred of Hoo, despite a public foot path being in existence there) there were major problems with parking. This was highlighted by parents and staff parking in the private lay by outside our house, and on occasion cars blocking our driveways preventing us from getting out and going to work or returning home at night.

This has led to several confrontations between residents and those using the lay by as a car park and with increased pressure on car parking spaces this tension will only increase.

Also there is a quality of life element to this development.

The peninsula has amazing scenery and areas of stunning beauty even in and around in Hoo. With the current proposals in place for concreting over green field sites rather than using existing brown field sites this will destroy the environment and countryside and the unique character of the different villages on the peninsula.

I will close this submission now, but I am more than willing to discuss this matter with whomever is responsible at the local authority and am happy to air my viewpoint further with the relevant person.

Yours Sincerely

Matthew Grace

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 21:29
To: futuremedway
Subject: medway local plan

Categories: Blue Category

Dear Katherine

Many thanks for a good workshop on Wednesday. Medway Local Access Forum has sent in a general response to many of the points in the plan. I wish to make these extra points with regards to the plight of horse riders of Medway area, equestrian's are poorly served by the rights of way network anyway and with the increase in the population of approx 31000 houses that will be approx 60000 plus cars using already congested lanes in the rural area such as Hoo peninsula, the village of Hoo has already changed from a small quiet place that was a pleasure to ride my horse in whether a quiet hack or to attend one of the local horse shows.

Using government data 7% of the population ride or own a horse what new provision is being included in the plan for the increase, I found no mention of any provision for equestrians. Medway rural areas are getting less and less, we must protect the countryside the rights of way and rural life before it's too late.
Regards

Sue Saunders Medway Local Access and British Horse Society Access Rep

From: [REDACTED]
Sent: 23 June 2018 21:39
To: futuremedway
Subject: 20180622-Local Plan Letter - MCHales

Categories: Blue Category

To Whom it may concern,

Dear Sir/ Madam,

I am writing with regard to the Councils Local Plan and Development Strategy to seek some clarification to a couple of points I have after reading the report and submitting comments on the 'online' response form.

May I start by asking my primary question which is:

1. The Plan predominantly sets out how the area is to develop up to 2035. What are the plans for development post 2035? is there further planned development specifically upon the Peninsula beyond 2035?

I will stand corrected but I am expecting the response to be along the lines that 'we cannot state at this moment in time what plans for development within the Medway Area and in particular the Peninsula will be beyond 2035'.

However, my reason for asking this question relates to past experience of a similar development within another County. 38 years previous I lived in a small village whose name was adopted by a city development. This development had the same aspirations as the Medway Local Plan to develop with the provision to 'ensure the area has enough new homes, jobs and infrastructure to support the expected population growth'. It paid particular attention to the 'preservation of the natural environment and heritage'. Today 50 years later that small village that I lived in and referred to earlier is no longer a village but a housing estate that has lost its name and has now been consumed within a larger New City. Gone is a lot of the heritage, gone are the open spaces and fields and the village identity has been lost forever. This development also had the initial intent to retain semi-rural spaces and avenues between each new estate. This aspiration, to a degree still exists but not to the same level as was originally intended, the greener spaces are being reduced as the demand for more housing becomes greater. So from this past experience I hope you can understand where my concern lies when we are presented to reflect the similar intent within our Local Plan.

Please do not misinterpret my concern for one of a 'Not In My Back Yard' type, this is certainly not the case. I accept that more housing is required in Medway. But I also feel that that demand should be reasonably met, that the necessary infrastructure is suitable at the outset and that any future infrastructure can be accommodated within the space available without sacrificing/impacting the heritage and environment that the plan is supposed to be protecting.

This leads me to my next question:

2. I note that within each scenario presented within the plan specifies substantial expansion of High Halstow, what has happened to the proposed expansion within other villages that was evident in last year's consultations?

In all of the scenarios development at Stoke and Allhallows are evident but there is no indication of expansion within the environs of Cliffe? Throughout last year's consultations there were proposals to include some sites in Cliffe, this was acknowledged and backed by statements that it demonstrated the intent that we adopt the approach:

'we should share the burden of expansion',

What has happened since last year to now discount the area around Cliffe and other outlying villages? The local plan is now suggesting another 765 homes for High Halstow, therefore immediately doubling the size of High Halstow in all 4 scenarios.

Granted, I appreciate that Stoke, Allhallows and again in all 4 scenarios there is significant development around Hoo but due to the reasons stated above regarding infrastructure and the protection of Green Areas circa 9,000-12000, extra houses on the Peninsula is in my opinion unsustainable, which I believe will have a detrimental impact in addition to any proposed development in the provision of alternative or additional road access. I suspect that the same will apply in principle for the remainder of Medway – that to accommodate 29,000 more houses between 2017-2035 will likely have a severe impact to the environmental, cultural and habitual elements of Medway. Furthermore, there will also be a significant knock on effect to the major link roads from the South and North of the area.

3. Chapter 11, Ser 11.5 – I noted the comment, the introduction of a new river crossing could facilitate sustainable transport and address the restrictions that apply to pedestrians and cyclists who are unable to use the Medway Tunnel’ therefore, can you please clarify this comment and do you have any indication where this crossing is proposed?

Furthermore, throughout the entire report there was reference to the Hoo Peninsula being the ideal location to develop the assets detailed below:

- Housing – Small Town Development.
- Rail expansion.
- Logistics Industry.
- Outlying Community Assets, (Schools etc).
- Second River Crossing (?).
- Aggregate/Chalk/Clay/extraction.
- Disposal to Land Resource Areas.
- Wind Farms.

Surely if all of this development is progressed the Hoo Peninsula will no longer be a RURAL Environ it will just become an extension and continuation of the London/Medway URBAN Footprint. This totally contradicts the objectives stated repeatedly in the report, ‘Exploit the current state’ of the environment – ‘control development to achieve the least impact to increase a healthy lifestyle’ – The plan continually implies that negative development would minimise what attracts people to these areas now. Relaxation, seclusion and a healthy lifestyle cannot be achieved in a concrete jungle with high levels of pollution.

However, I note and was relieved to read in Chapter 9, Ser 9.24/9.25 of the report that there is encouragement for the composition of a Neighbourhood Plan Scheme at respective localities. In conjunction with the Local Plan it is hoped to determine what houses, transport infrastructure (including public transport), doctors, schools, and shops are needed, where and when, to provide for consideration of the people who already live here. To also have some influence to best ensure that new housing and the supporting infrastructure fits in with the least detrimental impact on the Peninsula environment. It is accepted that houses are going to get built. The big question is:

4. How do we ensure the Council plans for the right number of houses in the right places without destruction to what attracts people and developers to the area?

In summary, I did agree and state online that in principle I was in agreement with the proposals and the details that were specified in the report; inclusive to information detailed in the associated documents. However, this comment was often quickly followed up with ‘as long as the Plan delivers and meets the objectives stated’. I would genuinely wish to believe that this is possible, subject to my concerns above being realised and that beneficial collaboration can be achieved between the residents of Medway, the Council and Government.

I look forward to any response that you may have in answer to my questions above and I would also like to thank you for providing me and other residents with the opportunity to voice our concerns via this and the online response questionnaire.

I await a response with anticipation,

Regards,

Mr Martin C Hales
A Resident of Medway

maryott, kyle

From: [REDACTED]
Sent: 23 June 2018 22:53
To: futuremedway
Subject: Rochester airport

Categories: Blue Category

As very local residents to Rochester airport we would like to oppose any decision to close the runway, therefore increasing the number of planes going over our property (Cloisterham Rd). In the summer it can sometimes be unbearable to sit in the garden when planes are continually going over. It makes more sense for the planes to take off over the countryside rather than over a highly populated area for people's safety and to reduce noise pollution. I hope our views are taken seriously!
Steven and Linda Lempriere

Sent from my iPad

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Telephone [REDACTED]
E-mail [REDACTED]

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

Date: June 2018

Ref: New Local Plan Consultation Document

The document mentions establishing a vision to drive economic success at the same time as addressing inequalities. Whilst not denying that careful planning may have to be sought to achieve that vision however accommodating sustainability of the Hoo Peninsula for example must avoid harm to its natural environment of which folk are attracted. It has to be acknowledged that protecting the best of Medway's heritage and its natural environment is of

paramount importance to the people it attracts. The Peninsula is not such that major change can take place without some consequence for its historic character and the way that character benefits the folk it accommodates.

Strategic Issues

The expansion of the Medway Towns to meet the Employment and Housing targets set out in the Government Objectives cannot be reached, or not even started, no matter which of the set out four scenario's is finally adopted, unless there are major and immediate consideration, planning and implementation of improvements to the transportation links and health services across the whole area.

The roads are gridlocked, the train services are overloaded and erratic, GP's surgeries are overflowing and the major hospital in the area is struggling to meet the needs of an expanding population, which exceeds by hundreds of thousands the number it was designed for. Each improvement made is just papering over the cracks for the short term gain.

Scenario 3: A Rural Focus.

The scenario, if approved would permanently destroy an area of valuable countryside. The scenario identifies Hoo St Werburgh as a focus for growth, expanding the village into a rural town. Principle expansion would be set outside the existing village envelope of Hoo village, but is within the parish of Hoo St Werburgh, and would join together the settlements of Hoo, Chattenden, Deangate and Lodge Hill, and reducing the green belt buffer zone between the peninsula and the spiralling developments of Strood and Wainscott , damaging the character of each of these local communities and riding roughshod over the wishes of significant numbers of taxpayers/local residents who wish to protect the countryside and the semi-rural environment.

The application, if approved, would signify a serious and continued over-development of the village of Hoo, and the wider Hoo St Werburgh Parish. Following mass over-development on land located East of Bells Lane, where no additional infrastructure was or has been provided, which has seriously

impacted on the villagers as a whole, these further developments would be a development too far.

With regard to accommodating a level of future growth making Hoo into more of a 'Market Town' rather than a village may be a step too far. Again it is mentioned that a larger scale of planned growth would come with improvements to existing facilities and provision of new – that did not really happen during the old plan and our members are sceptical with the suggestion that it will happen within the new plan. There is also much concern where it is mentioned 'there is scope for freestanding settlements on the Hoo Peninsula'.

This application, if approved, would add a greater burden of road traffic on the already busy Four Elms Hill, Main Road and other approach roads. The roads in this area have long been unable to cope with traffic levels at certain times. In particular there have been numerous near misses in Main road in the vicinity of the Secondary school and this will be exacerbated by the on-going development of the new Primary School on the site, which is already needed to cope with the increased population.

If successful the application would result in thousands of additional car journeys each day, including the current and projected commercial vehicle movements from industrial areas at the Isle of Grain, Kingsnorth, and the numerous farming and storage outlets across the Hoo peninsula. Four Elms hill is the only main access route for residents in the villages of Chattenden, Hoo, High Halstow, Stoke, St Mary Hoo, Allhallows and the Isle of Grain.

The only access and egress to the Hoo Peninsula the **A228 at Four Elms Hill** which has not seen any improvement since it was duelled, even though many hundreds of dwellings have been allowed to develop over the last few years on the Peninsula and especially in Hoo. Even the 'Sharnal Street Bypass' was privately funded by business. **Four Elms Hill is the gateway to the Peninsula** and when it is closed (which is quite often) the Peninsula is closed to the outside world. With regard to accommodating a level of future growth making Hoo into more of a 'Market Town' rather than a village may be a step too far. There is also much concern where it is mentioned 'there is scope for freestanding settlements on the Hoo Peninsula'. Further along its length, the A228 Peninsula Way reverts to a single carriageway road, which is a source of a considerable number of serious road traffic accidents, and the plans to create employment opportunities at Grain and at the Kingsnorth Power Station sites will increase the amount of road traffic, especially HGV movements on this road.

The proposed development scenario will destroy valuable agricultural land, with the uncertain future facing the proposed farming community and the country's population following the Brexit vote, and the demise of the Common Agriculture Policy, if it becomes necessary for the country to produce more food, this land becomes increasingly important, as once built upon it cannot be recovered.

Over-development of the Hoo Village in recent years has resulted in capacity problems at the local primary school, GP provision, (one of the two GP surgeries in the village has recently closed registration to new patients), dentistry services, general community facilities and local roads. The utility services are stretched to breaking point and beyond, on occasions with sewage removal being a particular problem at times, resulting in difficult problems for some residents which the Water Company have failed to solve. The existing Ancient Watercourse, (known as the Brook), which runs through the village is running at higher levels due to increasing rainwater run-off, as a result of development with inadequate drainage provision, this has resulted in occasional flooding at periods of continuous/heavy rainfall. The increased flow is resulting in serious erosion of the river banks, which the Parish Council is having to resolve with expensive repairs.

Finally, I would urge that the desire of the villagers to remain separate from the main conurbations of the Medway Towns should be respected and the creeping urbanisation halted.

Signed.

Michael Williams

Lesley Williams

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 09:29
To: futuremedway
Subject: Local plan consultation

Categories: Blue Category

Having looked at the future plans in the various documents for the development of Hoo St Werburgh I feel compelled to protest most strongly regarding these proposals.

I would like to remind you that the infrastructure is already overstretched regarding road access onto the peninsular, and the roads in and around the town (ex village) are at breaking point without more building on top.

Medical facilities are also already sadly in need of expansion- up to 3 weeks to get an appointment to see a doctor and then only for 10 minutes!!

Add to all this speeding drivers through the Chattendene speed restricted zone at four elms hill and the closure of Deangate Golf course and you have the makings of a large bustling township without any of the facilities or open spaces which make modern living more bearable.

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 10:41
To: futuremedway
Subject: PLANNING TEAM

Categories: Blue Category

I would like to raise my objection to the excessive planned housing growth in my area in Hoo.

Regards

John Foster

From: [REDACTED]
Sent: 24 June 2018 11:08
To: futuremedway
Subject: Public Consultation - Response to Plans to Expand Medway Housing
Categories: Blue Category

Dear Sirs

Everyone within the area will be aware of the plans to expand housing in the Medway Peninsula by an exceptionally controversial amount. Whilst there is a Government drive to expand housing throughout the south east, focussing a huge housing programme on an area that does not have the infrastructure to support it will result in considerable problems for the future. Whatever the motivations are for Medway Council to agree to such foolhardiness, is beyond common sense.

Consider that to accommodate mass housing in the area, the promises made by builders under s.106 are unlikely to follow. Please consider the existing structure, therefore, as this will be all there is to sustain expansion.

There is only one dual carriageway supporting the route to the Peninsula. **The road infrastructure is insufficient** and should there be an accident, there are no other direct roads in or out. With each house built, there will be usually be at least 2 cars, putting the pressure on the roads beyond capability.

There are **insufficient places for children at the local schools**. In order to support mass housing, schools will need to be built, maintained and staffed.

There **insufficient medical care**, with doctors in Hoo closing their books and new residents won't be able to reach a nearby doctor, practices already beyond capacity.

There are **insufficient social facilities**, closure of clubs means that the social structure of the area has broken down.

There is **insufficient policing**, with police numbers stretched beyond capability, crime will increase and anti-social behaviour (which is already rearing its head) will mean that the Peninsula will no longer be safe.

There is **insufficient support** for additional housing in this area, people who moved here moved for their right to a rural way of life. Their overall health is at risk.

I speak **AGAINST** the proposals for mass housing in the Peninsula. Without the infrastructure in place, this is social and logistical folly.

Judy Campbell
[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 11:24
To: futuremedway
Subject:

Categories: Blue Category

I hope I'm in the right place to respond on the right to state that we need no more new houses to be built in the Hoo Peninsula. There are too many here already and finding it extremely hard to get a Doctors appointment already. I have lived here all my life and with the housing already done now there are a lot of problems with a lot of things. Just getting in and out of Hoo is a battle. The schools are full to capacity. The doctors are hard to get into with sometimes 5 weeks to get an appointment with the doctor of your choice. We cannot continue with more housing as it's impossible to move now.

From: [REDACTED]
Sent: 24 June 2018 11:55
To: futuremedway
Subject: Fw: Opposition to Medway Council's Local Plan 2018

Categories: Blue Category

-----Original Message-----

From: [REDACTED]
Date: 24/06/2018 11:50
To: <futuremedway@medway.gov.uk>
Subj: Opposition to Medway Council's Local Plan 2018

Dear Planning Inspector,

My wife and I are very strongly opposed to the Local Plan for the following reasons:-

1. The building plans we have heard of are so enormous with the present removal of the whole of BAE Systems and now thoughts of the golf course, two farms and many agricultural fields in Stoke Road and the sports facilities in Dux Court Road, traffic wise our village cannot cope with our present road system when we experienced the recent closure of Bells Lane when the collapsed road forced traffic into the Stoke Road and the Main Road to get through the village and it was extreme just with present housing. Pollution too with these extreme builds is a major issue regarding the increased number of vehicles.
2. All sport and recreation facilities are a major issue too with present builds and future proposals to remove them with cricket, football, golf and athletics tracks etc and the Government always saying children should exercise more.
3. At present the Four Elms Hill and roundabout are extremely congested in the morning and evening rush hours with long queues forming. In the evening traffic currently coming off the A2 into the slip road to the Four Elms roundabout to reach our village and Medway tunnel or peninsular makes 20 minutes wait for our daughter and therefore the general public even now. High levels of pollution have been recorded due to static traffic.
4. For general living in the current village our two doctors surgeries cannot take more patients and are under extreme pressure. Doctors too are hard to come by these days. Our dentist could be put under pressure too.
5. The big issue too is education for children in Infant and Senior School. The second infant school has only recently been built to cover existing pressure so with thousands more proposed house builds this can cause major issues.
6. Public transport buses are full now to and from the village so how do we get more buses on the roads when this also increases traffic and pollution.
7. Our village shops and car parks are full now with the present population and with shops restricted to what they can store and supply it will force more traffic into towns.

8. Where is land available for more main roads along with schools and surgeries with all these proposed extreme house builds.

We will appreciate really strong thoughts to provide a strategic infrastructure plan before any further builds are ticked.

Yours sincerely

Reginald and Valerie Kuhn 

maryott, kyle

From: Terry Hoare [REDACTED]
Sent: 24 June 2018 12:11
To: [REDACTED]
Subject: Planning.

Categories: Blue Category

Dear members.

I write in connection with the proposed future development of this area as set out in the LOCAL PLAN. At present this area is already near saturation point, both in terms of housing, the road system, health and education. One has only to look at the congestion on the roads, or try to obtain an appointment at a surgery or find a school place for a child, to see that this county which was once the GARDEN OF ENGLAND is now merely a dumping ground for both people and rubbish. There are many instances of these being one and the same.

Our once green spaces are now being covered in concrete at a terrifying rate and there is no doubt that my grandchildren will NEVER know what their country was like before the advent of mass immigration. Your committee advocates the mass production of shoddily built dwellings without ANY provision for increasing the vital infrastructure necessary for supporting the people that live in them. It is indeed frightening to imagine what this area will become once the 'New Town' that you intend to build around Hoo is in place. The character of Kent and of Medway in particular has changed beyond recognition and unfortunately, NOT for the good. By the time this happens my generation will be gone and we will be the lucky ones. Later generations will not be so lucky.

Yours sincerely.

Mr & Mrs. T.C.Hoare.
Hoo.

From: [REDACTED]
Sent: 24 June 2018 12:39
To: [REDACTED]
Subject: consultation response

Categories: Blue Category

I am writing to you in response to a letter we have received from Kelly Tolhurst (MP for Rochester and Strood).

Myself and my husband are in agreement that more houses should not be built in the Hoo Peninsula area for the following reasons:

- There has been more than enough houses as it is which makes travel a much longer process due to high levels of traffic.
- The lack of medical facilities in the Hoo Peninsula area; there are two GP surgeries which are already at full capacity and they are unable to take on more patients. It is also extremely difficult as it is to get an appointment with a doctor of your choice and this can be anything up to 6 weeks before you see your specified doctor.
- The local bus route provided by Arriva is struggling as it is with buses either not arriving or showing up extremely late. The council control the bus routes and times and at present there is not enough provided for the current residents to travel in out of Hoo / Grain.
- The parking situation in Hoo is bad now with no where for people to park and residents and non residents are having to park on double yellow lines or even on the public footpaths. This is already a dangerous situation which with more houses being installed will make it a more critical situation.

There are more areas of concern however I am confident that you will receive more e-mails similar to this with other concerns raised.

Kindest Regards

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 12:49
To: futuremedway
Subject: Lodge Hill & Hoo St Werburgh Proposed Housing

Categories: Blue Category

I am not opposed to building new homes, as this will always be needed, what I am against is no infrastructure put in place for the new residence and it affecting current residence. There is one road in and out of the Hoo Peninsula, which is already very busy and there are no new medical centres/doctors, shops etc that have been put in to cope with the current new housing that has been built. New residence were told these facilities would be provided. There is no near walk-in clinic for people who can not get an appointment at their docors, the nearest one is Gillingham and if they don't drive, it is an hour bus journey (only 1 bus from Stoke a day, so if you miss it that's it!) as buses do not go through the medway tunnel, which would be a 15 minute journey to Gillingham. It is unfair on the local community to not put these kinds of facilities in, especially when this many more houses are going to be developed. This is why I totally oppose it!

Sent from my Samsung Galaxy smartphone.

From: [REDACTED]
Sent: 24 June 2018 13:47
To: futuremedway
Cc: [REDACTED]
Subject: Medway local plan

Categories: Blue Category

Dear Sirs,

I am the administrator of Deangate Ridge Indoor Bowls Centre .I have just read the local plan and wish to comment on section 4 of the report dealing with Indoor Bowls.

1. 4.15 Page 46 Table 11 shows Prince Arthur IBC as having Access type Pay and Play. This is incorrect. In order to play at Prince Arthur you have to be a member of the club.
2. Deangate is the only pay and play indoor bowls centre in Kent.
3. 4.16.2 you show a decline in membership of -27% since 2014. Whilst this is accurate you have failed to take into account that we have a total of 700 people bowling at Deangate including club members.
4. Deangate is open from October to April, Monday to Friday 9.00 to 22.30, Saturday 9.00 to 20.00 and Sunday 9.00 to 1730. Rink occupancy over the period has dropped from 90% to 83%
which supports our contention of 700 people bowling.
5. 4.17.3 Your conclusion in this paragraph cannot be supported by the evidence. The EIBA only measures club membership not actual bowlers. The three Indoor bowls clubs mentioned
in this paragraph are all membership clubs and the membership fees are double what they are at Deangate.
6. **4.17.4 I have to take issue with your recommendations in this paragraph. Since your evidence earlier is incorrect your conclusions based upon that evidence is incorrect and thus
your recommendations do not stand up to scrutiny. On the contrary If houses are built on Deangate Golf Course and Lodge hill then there is every expectation that this would improve the chances of the Bowls Centre surviving to the end of their lease in 25 years.**

Yours Sincerely,

Nigel Van Dyk
Administrator
Deangate Ridge Indoor Bowls Centre

From: [REDACTED]
Sent: 24 June 2018 13:51
To: futuremedway
Cc: [REDACTED]
Subject: Future of Hoo St Werburgh

Categories: Blue Category

Fao: Medway Council's Planning Team

Dear Sirs

We have recently received a letter from our MP, Ms Kelly Tolhurst bringing to our attention your intended Local Plan to shape the future of the Medway Towns, and your intention to build even more new homes on the Hoo Peninsular, especially in Hoo St Werburgh.

We have lived in Hoo St Werburgh for over thirty years, so have seen many changes over the years.

Hoo St Werburgh used to be a lovely small village, with a friendly community, with lots of places to walk and enjoy the scenery and peacefulness, away from the hustle and bustle of every day life. But now, its turning into a town.

The following statement lays out our opinion on the future of Hoo St Werburgh, which we hope will send a clear message to the Planning Inspector:

1. We accept that some extra houses are needed in Medway, but we think that **every** community in Medway must take its share.
2. **BUT** we do **NOT** accept that Medway can accommodate 27,000 more houses between 2017-2035. The Council **MUST** show that they are doing everything possible to get the government to agree that this is unsustainable for Medway.
3. We think that 10-12,000 extra houses on the Peninsula is **WAY** too many. That would destroy everything that makes the Peninsula special.
4. The Council admits the number of people in Medway is not increasing as fast as it was – so we ask the Council to recalculate and reduce the total number of houses it needs
5. It is impossible to tell from the consultation what number of houses are allocated where on the Peninsula, so we would like the Council to work with us on a 'masterplan' to include in the Local Plan, before any more housing applications get passed, so we can agree what houses, transport infrastructure (including public transport), doctors, schools, and shops are needed, where and when. The Council must pledge an end to piecemeal development here until that masterplan is in place.
6. We want the masterplan to consider the people who already live here, so that new housing fits in with our lives and our communities and doesn't ruin people's lives.
7. We think the Council hasn't explored several key options that are essential. For example, the Council should consider an attractive development at Kingsnorth. And the Council should consider redevelopment of Chatham town centre with housing options. These must be on the table, not just dismissed.
8. Medway Council must share with the people the plans they have for the roads and railways on the Peninsula, and for tackling air pollution. If the Council already has bids in for funding, there must be plans already, and we should see them.

9. The Local Plan must have more detail about the future of hospitals in Medway. It must include a timeline and possible locations.

10. We want the Council not to sacrifice protected places, such as Lodge Hill SSSI. Protected places should be Medway's trump card to say to government, "Hold on, we've got nationally and internationally protected places here, there's a genuine limit under national rules to what housing can go here". We are willing to work with Medway Council in a constructive dialogue. We want to know that Medway Council is genuinely willing to work with us.

It seems the Council intend to build all these extra houses, but at the end of the day, there is only ONE road leading to the Hoo Peninsular, and other villages, including Hoo St Werburgh, and that is Four Elms Hill. Have your Team considered that as the community grows into a "rural town", how this ONE road is going to cope with all the extra traffic? Take for instance, the sink hole that appeared at the top of Bells Lane. This Lane not accessible to drivers, for quite a few months. At the time there was only two roads out of Hoo St Werburgh, which led to Four Elms Hill. These were, Main Road, and Stoke Road. So because of the diversion, the community had to put up with heavily laden lorries and trucks trundling their way through the village to get to their destination. This led to a lot of congestion.

When we attended a public meeting last year regarding the future of Medway, and its housing, the first question we asked was about the road structure. We ask this question at every public planning meeting we attend, but we always get a negative answer.

My wife travels on the Wainscott by-pass virtually every day, to and from her workplace. On travelling home on the by-pass, she joins the long queue just before the Cliffe slip road, so it can take about twenty minutes before she reaches the end, and turns left onto Four Elms Hill to drive into Hoo St Werburgh. Why hasn't a slip road been built, to enable the commuters to drive to the Hoo Peninsular, Hoo St Werburgh?. Surely this would alleviate the heavy traffic trying to get to the Medway Tunnel and Strood.

Before you build any more houses, we suggest your Planning Team look at the road structure and facilities required, before attempting to build any more houses. There are many derelict buildings in the Medway Towns that could be turned into flats/houses. The Council need to look at these building first, Instead of choosing Hoo St Werburgh all the time.

Thank you for allowing us to give our opinion on your consultation.

Yours faithfully

Mr & Mrs Blaber

From: [REDACTED]
Sent: 24 June 2018 14:07
To: futuremedway
Subject: Local plan consultation - comments

Categories: Blue Category

Please see below my comments on Medway Council's March 2018 Development Strategy Regulation 18 consultation report.

1. General. I have little to add, in substance, to my comments on the January 2017 version of the report, as posted to the Council on 1.3.17

2. 3.7. Local Housing Need. The government's 29% increase over the 2015 SHMA figure seems surprisingly high. I agree with the Council's implication that, so far as the justification is that "the less affordable the local housing, the greater the need", it seems doubtfully relevant to Medway, given the area's relatively low house prices (by South Eastern standards). I also wonder if it is consistent with likely future rates of population growth in Medway, given the deceleration in 2016.

3. 3.11. Wider housing market area's needs. If Gravesham and/or Swale identify "excess residential land" during their own "plan preparation processes", I suggest this could be used to meet some of Medway's "Local Housing Need".

4. 3.27. Hoo St. Werburgh "rural town". As I commented previously, this is a "nice idea" - a new market town in Medway. The short distance between Hoo and Strood (currently, just a few fields) does, however, make me sceptical. How to prevent coalescence with Strood? - and so with the rest of the existing Medway urban area? Hoo hardly has a rural character now - rather, the feel of a quiet suburb. Doubling (or more) its size is unlikely to reinforce the remnants of a rural past. I have no objection to some expansion of Hoo, to meet "Local Housing Need" - if there is no alternative, after all available urban space is utilised. If it is to happen, though, it would be more sensible to view Hoo as a suburb, rather than waste time and energy attempting to create a "rural town" only a mile or so from (undoubtedly) urban Medway.

5. 3.43. Hoo Peninsula passenger rail service - reintroduction. As with the HSW "rural town", a nice idea - and I say this as someone who has now lived on the Peninsula for 33 years (St. Mary Hoo 28/Stoke 5) (in Stoke, close to the freight line). But will there be a demand? Throughout my working life when living on the HP (1985/2005, 2014/16, 2018 to date), I've commuted, by train, to the City of London. HS1 has knocked about an hour off the commute, when combined with the Thameslink from St. Pancras to the City (NB - not the Thameslink from Medway!). If I time it correctly, I can be home in 75 minutes from leaving my office, opposite St. Paul's, by taking the Thameslink to St. Pancras, HS1 to Strood, and then driving home. A train from - say - Middle Stoke (the nearest likely station to my house) to Gravesend, changing there to HS1, is unlikely to be any quicker - particularly, if there is only one per hour (as likely, given limited demand and if (as now) there is only one track on the line). That said, I appreciate only 8.66% of Medway workers commute by train - and not all to London. So, the most likely destination of putative HP-line rail-users would, I think, be the Medway towns, not London. But, on the existing line, if you lived in Hoo, and wanted to go to Rochester, you would have to take a train from - say - Sharnal Street to Gravesend, and then change, and go back on yourself. So, an HP passenger rail service seems feasible only if the route of the existing line is altered, to provide a direct link to the Medway towns - and, probably, widened, to two tracks, for a frequent service. Where would the money come from for this?

6. 3.52-3.61. Scenario 4 - Lodge Hill. At a presentation at a (lamentably planned!) Land Securities' open day promoting their (now abandoned) LH development, I was the only person who raised the issue of

Nightingales. It duly got chalked up on the blackboard. But no one else seemed interested. If they'd listened So - and as an enthusiastic birder -, I support the preservation of Nightingale habitat at LH. But, although I don't know the site well, casual observation suggests room for some development of brownfield land there, without damaging Nightingale habitat (e.g., on the site of the old barracks). Reluctantly, then, I support Scenario 4 - particularly, as it would (apparently) obviate the "need" for development of farmland at Lower Stoke.

In relation to Scenario 4, I would also note:

- if the currently built-up area of Allhallows Leisure Park were developed for permanent housing, I suggest this would:

- remove the "need" for development on the west side of Avery Way, Allhallows; and
 - create an attractive Thameside residential development - the only one in Medway with close views of the river;

- the non-industrial Hoo Peninsula retains a distinctive character - rural, tranquil, remote, rich in wildlife -, which all development there should respect;

- the industrial HP gets scarce mention in the report - scattered references to Kingsnorth, and none to the (apparently substantial) remaining development opportunities on the old refinery site on Grain (apart from the planned expansion of the LNG terminal). Do not neglect these possibilities. Granted, office and leisure development do not seem feasible, given the remote location; and

- the projected Swanscombe leisure park would indeed benefit Medway, by providing employment close to the borough - but the plan seems wildly ambitious, and so I doubt it will happen - except, possibly, on a much reduced scale.


7. 7.11. Opening up access to the coast/the needs of wildlife. A small point - but it would be a shame, if we couldn't let our dogs run freely on the seawall ! The likely material disturbance to birds (and other wildlife) is, frankly, minimal - and probably nil, outside the breeding season.

8. 7.35. Tranquillity - its contribution to conserving the "special character" of the Hoo Peninsula marshland landscapes. Indeed - and I know these marshes well. Development of any kind - including wind and solar farms - would wreck their character, by destroying the landscape.

9. 12.43. Renewable energy. "... The Hoo Peninsula provides a distinct opportunity for large scale wind energy installations ". Not on the marshes - see 8. above.

Regards

J. R. Smyth (Rodney Smyth)



From: [REDACTED]
Sent: 24 June 2018 14:12
To: futuremedway
Subject: Comments on Local Plan

Categories: Blue Category

The Hoo Peninsula is a very unique and special area. It seems to me that ALL the options in the Local Plan would destroy everything that makes the Peninsula so special. Building circa 10-12,000 extra houses on the Peninsula, is WAY TOO MANY and would destroy our rural environment and our communities.

“Development must be sensitive to the special qualities of a rural area.” As quoted by Dave Harris at the High Halstow Parish Council meeting on 18th April. So then why is our rural area providing around 40% of the required growth?

Dave Harris at that same meeting also said “Development is restricted in areas of AONB and Green Belt close to the estuary” SO my question is WHY is the Local Plan NOT protecting the SSSI site at Lodge Hill. If development is restricted in AONB and Green Belt land it should also be restricted at an SSSI site and should also NOT be included. Lodge Hill is designated an SSSI because of the nightingales, a threatened and red listed bird. Why is it OK to protect areas of Rainham and Capstone but NOT Lodge Hill?

Under the National Planning Policy Framework, local planning authorities should seek to avoid harmful impacts on PROTECTED SITES, such as Lodge Hill. This means development should NOT happen on land within an SSSI or adjacent to it where it will cause an adverse impact. We should do everything we can to protect our environment; the nightingales, the ancient woodland and other wildlife. Once it is gone, it is gone, FOREVER.

Medway Council has a duty to avoid damaging our nationally important wildlife sites. In fact in the Medway Matters Spring 2018, the article “Have your say on how Medway should grow”, it states “The plan shows how we [Medway Council] will look after our natural and historic environment”. Doubling the number of houses on the Peninsula and building on land/adjacent to Lodge Hill is certainly NOT looking after the Peninsula.

Regards

Lynda Collins
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 24 June 2018 15:53
To: futuremedway
Subject: Local plan development strategy

Categories: Blue Category

Local plan development strategy

I would like to submit the following comments on the Local Plan Development Strategy.

The Hoo Peninsula is totally unsuitable for any major new housing initiative. By reason of its geography as a peninsula, road travel to and from the area is necessarily a bottleneck. People living in any developments would still have travel to the centre of Medway or to Hempstead Valley or Bluewater to access large shops or other facilities. The idea that public transport would provide an adequate alternative to private car use is not credible. Recent history of public transport over the past 10 years or so shows that bus services are eroding steadily, in spite of increased population.

This proposal therefore does not satisfy sustainability criteria.

Nor does the proposal take into account quality of life or environmental considerations. Any major new housing developments would destroy the Hoo Peninsula's essential rural nature, creating an area which is neither town nor country but embodying the worst features of both. The countryside would be replaced by featureless suburbs.

Sylvia Barnes
[REDACTED]
[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 16:00
To: futuremedway
Categories: Blue Category

To Whom It May Concern,

I am writing to let you know how I feel about the further building of properties on the Hoo Peninsula. I live at 49 Peal Close, ME3 9HZ.

Further building on the peninsula is detrimental to the character and sustainability of our landscape. The wildlife is precious and their habitats should be protected. There is not sufficient infra structure to support more people. There is one road onto the peninsula and this is often backed right up and delays are frequent at peak times. There are not sufficient doctors, dentist or school places now this will only get worse.

While I appreciate people need homes there are other areas in kent that can accomadate the building of properties. There are places in Strood and the surrounding areas that could be delivered.

I strongly believe that the development of The Peninsula should be reconsidered carefully.

Sue Bush

From: [REDACTED]
Sent: 24 June 2018 16:02
To: futuremedway
Subject: Future Medway Local Plan 2012 to 2035

Categories: Blue Category

Dear Sir/Madam,

I object to a rural town based around Hoo St. Werburgh and to the expansion of the Hoo Peninsula villages. Reasons for my objections include:

1. The area is rural and the people already living there wish, in the main, for it to remain so.
2. The proposed level of housing would destroy the existing communities.
3. The existing infrastructure cannot cope with the current needs of people living on the Hoo Peninsula and the plan's approach to infrastructure is too vague to be given serious consideration.
4. There has already been more than acceptable building of houses on the Hoo Peninsula.

I also object to any development at Lodge Hill (SSSI), mainly because it is (obviously) an SSSI with a significant population of the UK's nightingales.

David M. Davison

[REDACTED]

From: [REDACTED]
Sent: 24 June 2018 16:39
To: futuremedway
Subject: Development Strategy Document/T4 Rochester Airport

Categories: Blue Category

We became aware just on 23rd June 2018 about the above strategy document from sources within our neighbourhood about this latest attempt to re-develop the airport (why were we and others not directly informed after all we are adjacent), we wonder how many are unaware!.

So how to respond to yet another attempt to get your way.

Why are you persisting with the project a venture decidedly risky commercially, huge risk relying on one runway after closing the cross runway, an ill thought of irresponsible policy. From what we can remember (so much has already been said these past years in responses), not sure whether there has been a full open comprehensive consultation on public safety/risk assessment/noise/ environmental impact study done in the interest of the very large and expanding residential neighbourhood, one would have thought there was a Statutory requirement etc to do. What about the CDM Regs (Construction/design/management) and Safety Case. We the neighbourhood have never had an open public meeting where our concerns could be openly addressed, oh yes I do remember one held at the airport several years ago. So in conclusion we feel that there are other necessary schemes that could be employed in this area, provision of schools, medical clinic, a new hospital etc to meet the needs of the increasing population and would be welcome, the amount available of £4.4 million would go a long way benefitting the wider community. How about including that in the plan as an alternative?

One important last point. We wish to know why we constituents of Primrose Close were not informed directly and since becoming aware we had to reply in haste to meet your deadline set for midday Monday the 25th June.

Richard and Prabha Stoneham – [REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 16:44
To: futuremedway
Subject: Local Plan for Hoo, St Wergurgh

Categories: Blue Category

Your planning documents do not appear to have any thought to the people who will live live in the future in Hoo St Werburgh.

I don't see any of your statement of infrastructure, eg Transport, Health facilities, schools parks, and population needs of the inhabitants.

I have seen plans for thousands of houses but nothing to support this plan.

This cannot go forward until those plans are properly considered and approved.

I also note there does not appear to be any plans in place to consider more roads to support all this currently there is just 1 major road off the Peninsula.

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 16:56
To: futuremedway
Subject: Hoo peninsula

Categories: Blue Category

The plans for Hoo peninsula have not been thought about, I have not seen any plans for any infrastructure, the doctor's surgery are not taking on any new patients, the one road out of the peninsula can't cope and the schools are bursting.

You are supposed to be considering the people in these plans but it appears you are thinking about the profit you can make over any thought and regard to the thousands of people that will be living here.

Mary Buss
[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 17:24
To: futuremedway
Cc: [REDACTED]
Subject: Hoo

Categories: Blue Category

Dear Sir/Madam

I and my partner are appalled that Deangate Ridge Golf course is closed for further property developments by Medway Council. There are now too many properties in Hoo with no additional amenities to back up the number of residents in what used to be a 'Village'. The volume of vehicles has increased that the roads can barely cope during peak times. Wouldn't want to think of the increase in air pollution. No infrastructure has been considered even for the additional housing developments that have been built over the last few years.

The countryside is being destroyed and the thought of driving home after a day's work with no longer the green of Deangate to view, but instead a concrete jungle!

You are taking away an enjoyment of life for many people and where there have been many potential young golfers, some successful enough to make it their career. At least it keeps the young generation off the streets.

Whatever your about to do is not correct. Once again it's a Labour Council mess up!

I hope you take note of the above.

Yours faithfully

F. Collins (Ms)



Virus-free. www.avg.com

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 17:29
To: futuremedway
Subject: planned housing on the Hoo Peninsular

Categories: Blue Category

Whilst understanding the need for more homes to be built, we find it grossly unjust for the Hoo peninsular and in particular Hoo village to take the brunt, as a huge influx of people and cars will be detrimental to our environment. Hoo is a village and residents want it to remain so. When Bells lane closed for several weeks the amount of cars diverted was very noticeable, it does not have the facilities for thousands more in the future. The infrastructure on the Peninsular and in Hoo cannot support all these proposed new residents, with one road on and off, limited schools, Doctors and Dentists. Hoo already has several new developments going up, any more will be even more disastrous.

Yours faithfully

L. M. Laker
L. F. Laker
I. M. Couch

From: [REDACTED]
Sent: 24 June 2018 17:40
To: futuremedway
Cc: [REDACTED]
Subject: My views on the Development Plan

Categories: Blue Category

I have read your document, Future Medway, and looked on your website. It seems that you are asking the people of Hoo and the Peninsula to choose whether they want to have 10,000, 11,000, or 12,000 houses built in Hoo or in scenario 4, houses on Lodge Hill or Stoke.

The people of Hoo do not want any of these scenarios, but there seems no other option for us.

Already, we don't have enough school places, doctors, and the local coop seems to be having trouble coping with the number of people using it now and you already have another 600 odd houses in the pipeline exiting onto Stoke Road and I don't know how many on the Belway estate at the top of Bells Lane. These roads are small village roads and not suitable for the large lorries that come through. There are cars parked on the road because many small cottages have no drives or garages and some homes have an excess of cars for the capacity of their drive. In addition to this other people park here, (often on the pavement because the road is narrow) to use other nearby facilities. Only this week we had a huge refrigerated Spar lorry, which could not get through as people using the playgroup had parked there as there is no car park at the playschool. The lorry blocked the road for at least 5 minutes. Even the village car park, near the shops is very full as some people park there to get their breakfast or lunch. The days of packed lunches seems to be a thing of the past, so you need to plan around that. This village is reaching its capacity already, with not enough doctors, school places, free parking facilities and we still have all the houses along Stoke Road and the Belway estate at the top of Bells Lane coming soon.

Employment on the Peninsula

I feel that the Peninsular has plenty of employment opportunities. There is the Isle of Grain, Thamesport, the power station, Kingsnorth, Agriculture, shops, schools, doctors dentists, Hoo Marina to name but a few.

Natural Environment

As I remember Hoo it was of open cornfields and marshes, with fruit orchards, wild flowers and skylarks and of course the bluebell woods and nightingales at Lodge Hill. I don't feel you are protecting this too well, and the levels of air quality have certainly not improved around here and I don't think it will be very good for all the houses built either side of the bypass. I feel that flooding is a serious possibility. I know the developments to the south of Stoke Road have overspill ponds on their plans, and these are probably sufficient to cover their developments, but what about all the new houses up the top of Bells lane and the Belway development, to say nothing of the houses on the other side of the bypass and those around the roundabout at Chattenden. All the run off from the houses and roads will all run downhill into the Hoo brook. Even now Stoke road floods at Yew Tree Lodge and at Jennifer Court.

Planning for infrastructure

We need to have this infrastructure in place before the houses are built. You suggest schools, healthcare, sports facilities, green spaces and utilities. I don't know if you include broadband in your facilities but I feel we definitely need cable out on the Peninsula.

Transport

Whereas it would be nice to pop up to Sharnal Street Station and jump on a train to Ebbsfleet and then on to London, this would take a lot of money and time. We need these services to be in use before the houses are built. a single track line with one train chugging backwards and forward in between the freight trains would not cut it! Now we come to the other transport. There is just one road onto the peninsula. This road goes through both the roundabout at Chattenden and the one at the bottom of Four Elms Hill. This will just not be sufficient. Are you suggesting that if there is a railway, we will not need a new road? We need this infrastructure in before any more houses are built and how can we make decisions as to which scenario we prefer if we don't know what you are doing about these things which are going to adversely affect our lives. We need more specific information.

Also I heard on the South East news that Medway Council has offered to allow ships to come into Gillingham after Brexit if there is a lot of congestion at Dover. Where are these lorries going to go when they get off the ships? Not through Gillingham High Street, or through Chatham, they will go under the Medway tunnel and end up at the roundabout at the bottom of Four Elms Hill, on their way to the A2! Even more congestion for people trying to get on and off the Peninsula.

This is what I think about your Development Strategy Consultation. So far it is not looking like a "flourishing and attractive environment". We need more information about when and where this infrastructure is going to be, in order to make a decision. Scenarios 1, 2, and 3 look almost exactly the same covering Hoo. As for scenario 4, I think Stoke and Capstone can cope with a few more houses. Lodge Hill would make a wonderful country park with bluebells and nightingales, walks and bike rides.

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 17:51
To: futuremedway
Subject: Local plan consultation

Categories: Blue Category

To whom it may concern

My name is Michael Pointing i live in Hoo st Werburgh.

I am responding to the consultation on the grounds that further housing on the Hoo Peninsula would be detrimental to landscape and no doubt it will effect the lives of all who live in this rural constituency.

This is a village that is now become overcrowded our landscape and way of village life is being destroyed

Yours sincerely

Michael Pointing

Sent from my Samsung Galaxy smartphone.

From: [REDACTED]
Sent: 24 June 2018 18:09
To: futuremedway
Subject: DEVELOPMENT STRATEGY DOCUMENT

Categories: Blue Category

We would like to make the following comments regarding the above:

We believe that your planning policy for aviation in Medway, together with your proposal to close the 16/34 runway is extremely dangerous for local residents and users of the HS1 and M2 motorway because:

There will be an unacceptable development of new hangars, control tower, fuelling, parking etc., all of which will intensify aircraft departures and landings, thereby overburdening the local area with noise and endangering lives.

The cross runway needs to be retained for safety reasons.

We firmly believe (& always have done) that a full and comprehensive independent public safety study should be carried out together with an Environmental Impact Study before any further development is carried out at this site. Despite being repeatedly told by Medway Council that the CAA are responsible for public safety we know for a fact that they are not!

The additional noise we are now having to suffer as a result of the Air Ambulance relocating to Rochester is more than enough for any resident resulting in us being unable to have all our windows open in the heat of the summer because of the constant drone of the rotors so we really do not want to have additional noise from aircraft taking off and landing at all hours in all weathers!

We are not opposed to the airport in general (although we do believe that better use could be made of the site) but we are opposed to any future development of what was, originally, an airfield and not an airport!

We do not believe that Medway Council are listening to the public on this matter, instead forging ahead with plans that many of the local population are opposed to. Surely more would be achieved by not concentrating on the airfield but on everything else that needs attention in our area - improvements to the roads, improvements to the infrastructure to cater for all the new builds, i.e. additional surgeries, schools and even an additional hospital as Medway has one of the largest catchment areas in the UK and is clearly not coping at the moment.

Sue Haggerty
George Embleton

Sent from my iPad

From: [REDACTED]
Sent: 24 June 2018 18:16
To: futuremedway
Subject: Development Strategy document

Categories: Blue Category

I would like to strongly protest at the Council's plans for Rochester Airport. With the closing of the cross runway all flying will be in one direction. With the plan that all flying will be from one runway and the inclusion of trainee pilots

the danger to local residents will be vastly increased. As was pointed out many years ago by a pilot with 500 flying hours to his credit, Rochester is not a safe airport, there being no safe place for a pilot in trouble to land with any hope of not causing death and destruction to families or people on the M2 motorway or the HS1 rail.

The area is now more densely populated, residential buildings being metres from the airport boundary and traffic in the area vastly increased.

There is a real need for a safety assessment by a neutral and independent professional. This is not the responsibility of the CAA outside the airport

There is also the question of the increase of noise and pollution that residents will suffer with possible damage to health and wellbeing.

I strongly disagree with the plan to include the Airport in the new Medway Plan. It cannot be shown to be viable as an Airport and the land could be put to much better use.

For example Medway hospital is struggling to cope with the ever increasing population, even the ambulances are caught up in the queue to get onto the site.

There is enough room on the airport site to house some of the services that Medway hospital is struggling to provide. That would be very popular with the public.

I think serious thought should be given to the complete lack of concern that you have for all the residents in the vicinity of the Airport.

G. Beck
[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 18:27
To: futuremedway
Subject: Consultation Response

Categories: Blue Category

Dear Future Medway Team,

I am a resident in Hoo and I'd like to highlight that I fear further housing on the Hoo Peninsula would be detrimental to the character and landscape of this area and the people who currently live in the area.

I am concerned about the impact on infrastructure of further housing as this is already strained. I feel it is unlikely the services required to support house building will be put in place and as such the existing community is highly likely to be adversely affected. Having sufficient health services, schools, roads and transport infrastructure is in my opinion essential.

Best Wishes,
Lisa Houillon

From: [REDACTED]
Sent: 24 June 2018 19:01
To: futuremedway
Cc: [REDACTED]
Subject: Counsulation response regarding Medway Council's Local Plan

Categories: Blue Category

To whom it may concern,

My family and I have great concerns regarding the local plan for the large amount of housing to be placed on the peninsula and Hoo St. Werburgh in particular. This will not only have a detrimental impact on the lives of all the residents not only in Hoo but the whole of the villages on the Peninsula.

The building of thousands of houses all in one area will cause a strain on services ranging from Doctors, hospital, schools, utilities, roads and transport. By the nature of being a Peninsula the infrastructure of the roads is not capable of coping with the amount of traffic flow that this development will create. For example every thousand houses built, could create a further two thousand cars and probably more. Multiply that with the amount of houses that are planned the congestion on the roads serving the communities would be horrendous. There is already congestion at rush hour times and even a small incident can cause utter chaos.

At Hoo in the past we had various sporting facilities and gradually these have disappeared. We have lost what used to be the BP club which provided football pitches, cricket ground, swimming pool, squash and tennis courts. This also provided a venue for events. This is to be built on. Recently, the golf course has been closed. This was another place that could be booked for events. The closure of the golf course has particularly affected the senior members which not only provided them with exercise keeping them fit and well there was also the social aspect. This is another area that could soon be covered with houses. We have one swimming pool at Hoo with a gym which was built 50 years ago and beginning to look tired. These facilities disappear without anything put in their place. Promises regarding the building of a new Sports Centre in the future is just that promises.

It is pointed out that in our area of Medway we have the "Wainscot Bypass" this not only serves the Hoo Peninsular, Medway City Industrial Estate, Strood, Gillingham, via the highly polluted Medway Tunnel and, further down the line Sittingbourne etc. Put the pressure of thousands of extra cars, commercial vehicles that would serve this huge development and this road would soon fill up with queues backing up the A2 on both sides. (You don't have to be a genius to work that one out). I believe that there are also plans for a further development on the Industrial area on the Kingsnorth site which would also increase traffic of heavy goods vehicles causing more pollution and congestion.

This brings me on to air pollution with a report that Gillingham is the third most polluted town in Britain, with the major concern being the area around the Medway Tunnel. I find it surprising that only Gillingham has been highlighted rather than all the Medway Towns, it being a conurbation. I was very interested to read in the local Medway Messenger an article about pollution under the headline ***"It's no wonder town is battling pollution"*** and I quote:

"How is the problem to be fought in the Medway Towns? The area has massive housing targets to achieve. That means more cars, more Lorries, even more everything. There is only so much you can do to reduce congestion by traffic management methods."

The problem of air pollution brings me onto another cause for great concern, which I know many people worry about, which is our health. Pollution is a silent killer and is responsible for many health conditions. Where are the

plans for a new hospital to serve all these extra people that will come into our area, as well as the present population? Surely a new hospital is a vital part of the infrastructure to meet the needs of the community. Our present hospital Medway Maritime is just not 'fit for purpose' and is unable to cope with the existing population. For a start it just isn't big enough – it has no room for expansion having a small footprint and being locked in by local housing. With all the hard work and goodwill by the staff, it will never be good enough to meet the needs of the people. The roads around the hospital are congested by cars trying to get into the hospital to park. For afternoon appointments, if you are lucky to have one, you are unable to park in the hospital. Parking in the roads around the hospital is also difficult.

Lastly, I wish to put mine and many other people's concern regarding the environment. My family have lived on the Hoo Peninsular for over 50 years and we cannot understand how an area that has been designated as a SSSI can have this status completely disregarded by Medway Council in allowing development going ahead at Lodge Hill. This decision appears to be in direct conflict with the National Policy Framework. Surely, this will mean all protected sites around the country will be **at risk** from development. Once these areas and the wildlife are lost they are gone forever. We feel that the future of our rural communities and the unique environment on the Hoo Peninsular is under threat.

Come on Medway Council stand up and look after the interests of the Medway people who you represent instead of trying to make a name for your selves as the Council who met the Government's requirements. You have a big responsibility to the people of Medway, because if you get it wrong, we and the future generations will be the ones that suffer.

Barbara Seare and Family.

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 19:35
To: futuremedway
Subject: Hoo St.Werburgh

Categories: Blue Category

To whom this may concern,

I have recently received a letter and have seen in the media that there are plans to develop and expand the Hoo Peninsula in a great way. I completely understand that there is a need for more housing in the area, however I am concerned regarding the infrastructure which is here and will our local doctor surgeries, nurseries, schools and shops be able to cope with the demand. I am already on waiting list at a nursery for my son which I have been told there are no places until September 2019 and this is without the growth planned for the area. I have also noticed the traffic volume has increased rapidly coming into Hoo (Forums Hill) and feel this will need to be addressed to accommodate.

I would be grateful if you could update me on the concerns I have highlighted above.

Best wishes,

Emma

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 20:05
To: futuremedway
Cc: representations, planning
Subject: Local Plan 2012-2035 Consultation

Categories: Blue Category

Hello

I have read and considered the draft plan very carefully and this is my response.

It is shocking to find that Medway Council is proposing that thousands of new homes are to be built on the Hoo Peninsula without sufficient infrastructure being provided for new home owners as they move in. The result will be that existing facilities already stretched to breaking point will never be able to cope.

No doubt Medway Council's will argue that additional facilities will be provided but as I understand it developers are not required to contribute to the cost of these until the last home on a development has been sold and the profit on the development known. This means that the new homes will be built and occupied several years before any new facilities are provided.

Until such time as these new facilities are available for use existing and new residents will have years of suffering:-

1. a severe shortage of school places,
2. a dangerously long wait to see a doctor
3. a poor road network e.g one road on and off the Peninsula with massive delays on Four Elms Hill
4. a poor sewage system which is at capacity already
5. a water supply which will not cope
6. proven dangerous levels of pollution
7. a main hospital which will never be able to cope
8. insufficient sporting facilities
9. insufficient parking for local shops

Sadly and inevitably the result will be a very poor quality of life for all Hoo Peninsula residents.

Please try your best to raise finance to provide at least some of the essential infrastructure. These loans to finance infrastructure can then be repaid when the S106 funding is received.

Best wishes

Melanie Rees

[REDACTED]

Sent from [Mail](#) for Windows 10

From: [REDACTED]
Sent: 24 June 2018 20:07
To: futuremedway
Subject: FUTURE DEVELOPMENT OF THE HOO PENINSULA

Categories: Blue Category

I wish to object to the present housing plans for the above area until a thorough investigation is made into the following:

1. The fact that there is only one main road to all of the villages in this area really does need looking at. The building of just 500 houses could produce at least 1,000 more cars on just the Highway alone. Traffic queues are already bad at peak times surely we do not need more cars and pollution levels going even higher.
2. We only have 2 doctors surgeries, one has already closed their books and you can wait 2-3 weeks at the other one. If more surgeries are built where will the qualified come from when there is such a shortage.
3. The 100 of Hoo School is full and cannot increase in size. it is wrong that children are bussed out to other areas causing more traffic problems in another area and pollution. Also the day is long enough for school children

n nowadays without having the hassle of travelling to school. We should be encouraging more exercise and walking to a local school.
4. I think Deangate Ridge should be turned into a Leisure Centre to encourage the children in the area and give them something to look forward to instead of roaming the streets and causing a lot of problems. The swimming pool could be included on Deangate then maybe just 50 or so houses could be build where the pool is now.

Christine Shields

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 20:32
To: futuremedway
Subject: Development strategy document

Categories: Blue Category

I email regarding Policy T4 Rochester Airport and respond to question T7:-

My answer is NO I don't agree with proposed policy for aviation medway. I live very close to the airport, with planes flying directly overhead and am disturbed by the noise of the various aircraft flying from Rochester Airport and worry about the dangers posed by the aircrafts. If the airport must be retained then I feel strongly that Medway Council should RETAIN CROSS RUNWAY.

Yours sincerely
M Kelly

Sent from my iPad

From: [REDACTED]
Sent: 24 June 2018 20:41
To: futuremedway
Subject: Development Strategy Document

Categories: Blue Category

Rochester airfield Public comment for the Local Plan.

I am strongly opposed to the expansion of aviation at this airfield without any risk and public safety reporting. The airfield is dangerously located very close to densely populated areas and public infrastructures of the M2 Motorway and junction 3 of the SRN and HS1 high speed rail line. The proposed intensification of air movements will significantly increase the risk of an aviation accident and destroy residents amenity and the tranquillity of the AoNB. Natural England also strongly object to this proposal, the LPA will not be able to protect and enhance the AoNB features this site is protected for.

There are 18 schools located within a mile radius of this airfield there is no investigation into how this may adversely affect children's learning environment, their health or safety. Medway council has always confirmed development here will only be considered on planning issues not those of public safety. The LPA will not be able to mitigate against noise, environment or loss of privacy there is no statutory legislation. In these circumstances planning permission should be refused.

There is no need to dangerously expand aviation training here or facilitate gyrocopter type noisy machines, these could all be re-located to Stoke airfield which is better situated.

Medway are now using their propaganda machine to fool every one into thinking they are scrapping the contentious part of the development the paving of 02/20, not so. The contentious part of this plan is the closure of the cross wind runway 16/34. Do not be fooled by their lies and deceit. I have nothing against the continuance of the airfield as it now operates but I am most definitely against trying to combine commercializing the site and trying to operate this airfield on only one runway the two are not compatible.

This is a large valuable freehold property the council are duty bound to return the best value for money to council coffers, no alternative uses for this airfield have ever been considered and the council are losing Medway residents millions of pounds every year by not capitalising on this asset. They receive a peppercorn rent of only £30,000 per annum, this is laughable and most wasteful.

Since this airfield opened, 85 years ago when this was an open field in countryside surroundings. Medway council are negligent having never considered public safety or noise nuisance despite previously reducing the number of runways from three down to two for land crab. They now intend to increase and intensify all air movements onto a single runway. No Environmental Impact Assessment has ever been completed despite the Secretary of State for DCLG issuing a direction for this study to be commissioned. They continue to ignore due diligence and duty of care and avoid any investigation into noise, risk or public safety.

Medway council are negligent to allow unrestricted air movements and never established any baseline for planning calculation comparison. They are unable to mitigate air movements and have confirmed they want to remain flexible on increasing numbers.

Public consultation confirmed 908 local residents 85% of those that voted wanted this plan scrapped, Medway council have no public mandate for this plan refuse to listen to the community and force ahead with their unwanted aviation expansion. The operating company RAL have let the property dilapidate over several years the council have turned a blind eye and never enforced the full repairing and maintenance terms of the lease. The council also allowed them to illegally install two helipads and operate taxi services from these constructions, only legalising

these when residents discovered this illegality. So the council have given a company in breach of their contract a new 25 year lease with a clause that allows them to walk away with any financial gain when they want to.

It is proven the council are either unwilling or incapable of controlling the tenant or enforcing the lease terms or planning legislation. This council has been found to be corrupt in saying there will be less noise than now and advising the planning committee in planning terms noise will be objectionable, it will not.

Taxpayers are funding this project to the tune of £7.3 million. The only beneficiaries of this donation are the private operating company Rochester Airport Limited (RAL), who refuse to put any contribution to the cost and will not be asked to repay this funding they are sitting pretty the value of their company shares could realise them a nice little earner, nice work if you can it? Ask yourself, would any responsible Authority spend £4.4 million on airfield infrastructure improvements for the benefit of 80 or so members of the flying club? Their plan is to commercialise and develop aviation to boost the profits of the private operating company regardless of the consequences to this community. Air quality and other pollution checks and controls should not be carried out by members of Medway council staff, this must be done independently and the results published.

There is no community benefit and unlikely to be any new jobs to speak of, Highways England are opposed to the business park without significant investment into the infrastructure and local roads network so it is doubtful work on the business park will ever be started, we will be left with all the inconvenience of aviation overburdening and noise nuisance.

Whatever the outcome, do not let them continue with this plan unless an independent risk and public safety investigation confirms residents will not be put at any higher risk.



maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 20:44
To: futuremedway
Subject: Hoo St Werburgh

Categories: Blue Category

Dear sir/Madam,

I am writing to object to your Local Plan regarding turning Hoo St Werburgh into a "town". I assume this is a reaction for having the building work at Chattenden turned down.

The residents of Hoo live here because it is NOT a town with all the associated traffic, noise, and pollution. We live here because we can walk to green fields and open spaces

and people can still ride horses on the road (at the moment anyway).

I recently tried to make a Doctors appointment. I was told it would be at least two weeks or I could travel to Gillingham to the walk in clinic, and this is just because of the extra people now living in Hoo.

There is one main road into and out of Hoo. If this is closed for any reason (accident/bad weather) Hoo is virtually cut off.

If you were really concerned about the local residents you would ensure that the infrastructure was in place BEFORE any more house building took place, or preferably

don't build any more houses in Hoo. WE DON'T WANT THEM.

We have all read the gumph from developers about how they're going to enhance the area with open spaces and new roads etc. when in fact all they do is overwhelm the existing infrastructure

with people and traffic.

So please leave Hoo alone. We do not want to be a "Town"

Regards

Chris

From: [REDACTED]
Sent: 24 June 2018 20:45
To: futuremedway
Cc: [REDACTED]
Subject: Future Medway Local Plan - Opposition to Hoo St. Werburge development

Categories: Blue Category

I am writing to oppose any future housing development around Hoo St. Werburgh.

The current benefits Hoo offers residents would be totally lost by the councils' plan to build a "rural town on the Hoo Peninsula". Hoo is a village, albeit one that has already expanded in recent years, and any additional development would spoil the lives of the people currently living here.

Local people are not "concerned" and "want to see new housing supported by upgrades to local services and facilities". Local people do not want new housing in the first place. Obviously if there were to be new housing THEN they would be concerned and want upgrades etc.

Infrastructure is not the only issue that would have to be addressed. At present the Four Elms roundabout causes long tailbacks in the mornings and evenings from and to Hoo, there is two main access roads into Hoo which also struggle to cope to "rush hour" traffic. The council has already demonstrated its incompetence in handling the recent Bells Lane closures which shows that full and proper planning was not taken by the council prior to awarding Bellway the right to build housing at "Nightingale Rise". With this lack of planning, expertise and common sense any further development cannot be a success as far as local people are concerned.

No matter how "sustainable" future housing developments may be the impact on local people and the local landscape should not be ignored. Open fields and quiet lanes and roads would be lost which will have a negative affect on those who currently live here. If residents here wanted busier roads and more shops and an increase in people they would move to Gravesend, Gillingham or Rochester.

At the end of the day you are forecasting the need for additional housing, but if you don't build the housing in the first place then there will be no need for it as people would find somewhere else to live.

Hoo St. Werburge is a village. Let it stay that way.

Regards,

Mr J Walsh

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 21:35
To: futuremedway
Cc: [REDACTED]
Subject: Objection To Further Hoo St Werburgh Development

Importance: High

Categories: Blue Category

To whom it may concern:

I wish to register my strong objection to any further / additional housing developement plans being made in the Hoo Peninsular, particularly in and around the village of Hoo St Werburgh.

I moved to Hoo mainly because it was a village with all the charm and characteristics of a beautiful, peaceful village with stunning countryside views and varied, plentiful wildlife. I made a concious decision to buy a property 50+ years old and not one of the new builds so that I could be sure that I wasn't contributing to the detriment of the village.

I have previously lived almost all my life in the towns of Dartford and Gravesend and have no wish to live in another town - rural or otherwise, with all the anti-social behaviour, crime and no community spirit that modern towns sadly seem to generate.

The Nightingale Rise developement and the one at Four Elms roundabout is already erecting far too many homes for the exisiting infrasructure to cope with. The most recent new builds on Bells Lane are causing parking issues and hazardous driving conditions in that now overly busy road, and the recent repeat closures of the same make me doubt how well the land etc has been surveyed and managed both by Bellway and the council. The closures have also surved to highlight the current amount of traffic already in the village, without adding however many hundreds of new vehicles the previously granted builds will generate.

Whilst I appreciate that everybody is of the "not in my backyard" opinion, the beauty of the landscape, it's wildlife and the fact that it is the **VILLAGE** of Hoo St Werburgh must be taken into account. It is not a town and I'm sure that none of the residents will wish it to become one.

If these latest plans go ahead, will you compensate all the existing villagers sufficiently so that they are able to move elsewhere to find the same beauty, peace and tranquility that they have worked so hard to currently enjoy?

I can only hope that those in a position of authority will take into account the very strong views against further development that those who trustfully elected them hold and on this occasion make the right decision.

Regards,

Sarella Chalkley



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

24th June 2018

By email only to: futuremedway@medway.gov.uk

Dear Sir or Madam,

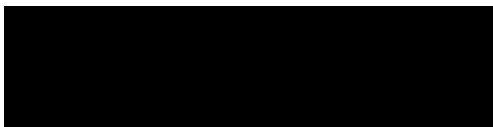
**MEDWAY LOCAL PLAN 2012-2035: REG 18 DEVELOPMENT STRATEGY
CONSULTATION: Representations on behalf of Tarmac (land at Kingsnorth)**

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

Tarmac has extensive land interests in the Medway Valley and the Hoo Peninsula. Over the plan period there may be opportunities for expansion of existing minerals extraction, and Tarmac believes the Medway Local Plan should have due regards to the safeguarding of minerals extraction when planning for future development needs.

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

Yours faithfully

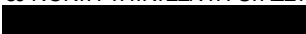


R. Arwel Owen
Partner

email: 

enc. Representations submitted on behalf of Tarmac

cc. 

David Lock Associates Limited
50 NORTH THIRTEENTH STREET, CENTRAL MILTON KEYNES, MK9 3BP
 e: mail@davidlock.com
www.davidlock.com



Question MWE1: Do the proposed policies MWE1-MWE5 represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway? What do you consider would represent a sound alternative strategy for minerals planning in the Medway Local Plan?

The Hoo Peninsula is Medway's only major source of land-won sand and gravel and as minerals planning authority, Medway Council has an obligation under the national Planning Policy Framework to plan effectively for a sufficient supply of minerals and ensure that where they are found, best use can be made of them to secure their long-term conservation. The obligations set out under the NPPF include the setting out policies for extraction of minerals, define Minerals Safeguarding Areas, safeguard infrastructure associated with the winning of minerals, as well as planning positively for the prior extraction of minerals if non-minerals development is to take place.

In 2007 conditional planning permission was secured at Kingsnorth for extraction of sand and gravel (with restoration), together with a ready-mix concrete plant. The permission was varied in 2013 to extend the permission. The site was well placed to serve the (then) planned replacement of the Kingsnorth power station. Due to the change in circumstances at Kingsnorth power station (the plant is now being demolished, rather than replaced) the commencement of minerals extraction was delayed. However, due to an improvement in the market for aggregate, the site became operational in autumn 2016. Since that time, market demand has consistently grown, leading to an increase in extraction in accordance with permitted rates. Forecasts indicate an ongoing market for the sand and gravel extracted at Kingsnorth, and current projections indicate that the total permitted reserve offers, subject to operational configuration, may offer fewer than 7-years of extraction.

The Hoo Peninsula minerals prospects provide an important counterpoint to marine-won materials. It provides both constant supply (to balance fluctuations in marine supply) and offers a counterbalance mix of sand and gravels (whereby Kingsnorth offers a higher gravel balance compared to the sand rich marine resource). Kingsnorth is also able to provide specialist low chloride material required for structures in or close to water. Tarmac's own minerals team has identified prospects which, if realised, could secure ongoing extraction delivering long-term supply of sand and gravels within Medway.

The Hoo Peninsula, and specifically land at Hoo St Werburgh, has also been identified as a potential location for strategic residential-led development. Kingsnorth has been identified as a strategic employment location and continues to grow. This growth offers opportunities to make use of locally-won materials, but must also be managed to avoid the sterilisation of resources either by failing to secure extraction before development, or by introducing sensitive receptors which adversely affect existing or planned operations. As the NPPF recognises, avoiding needless sterilisation is a matter of national policy.

Tarmac recognise the synergy between locally-won aggregates and strategic growth and wish to play their part in that sustainable story. Tarmac have actively discussed future minerals prospects in the Hoo Peninsula with landowners. In Tarmac's view, the NPPF's objective of securing the prior extraction of minerals in advance of development can be upheld, and believe that active planning for minerals is an essential part of the future of Hoo St Werburgh and the Hoo Peninsula.



In order to ensure that the Medway Local Plan provides a sound policy basis for both minerals and growth, Tarmac believes that:

1. a long-term view must be taken of the minerals prospects on the Hoo Peninsula, notwithstanding the NPPF's requirement for a minimum 7-year landbank for sand and gravel;
2. the safeguarding of minerals prospects is necessary to ensure that future prospects are not sterilised; and
3. opportunities for growth should be advanced only in light of minerals prospects with the relationship of the phasing of minerals extraction and any future development central to the Local Plan and any more detailed master planning (such as the Hoo St Werburgh Development Framework).

Tarmac are committed to working collaboratively to ensure that these objectives are achieved. In Tarmac's view, the following specific policy considerations should be incorporated into the development strategy:

1. Policy MWE1 should uphold bullet 6 of paragraph 145 and plan for **at least** a 7-year landbank, and preferably a horizon which recognises the long-term prospects around Kingsnorth and Hoo St Werburgh.
2. Policy MWE2 should safeguard minerals prospects (in line with paragraph 143 of the NPPF) and provide a basis for ensuring the prior extraction of minerals from sites which may then be identified for non-minerals uses. The extent of the safeguarded areas should be informed by geological advice and input from Tarmac as a primary interest in the area.
3. Evidence base materials, including any work to master plan or assess the potential for development in Hoo St Werburgh should be undertaken on a collaborative basis, engaging land owners, developer interests and Tarmac to ensure that coordinated planning and sustainability objectives are secured.



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

24th June 2018

By email only to: futuremedway@medway.gov.uk

Dear Sir or Madam,

**MEDWAY LOCAL PLAN 2012-2035: REG 18 DEVELOPMENT STRATEGY
CONSULTATION: Representations on behalf of Tarmac (land at Halling)**

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

Tarmac has widespread land interests in the Medway Valley associated with the permitted Medway Cement Works and other residual ownerships. We previously provided comments on the Development Options Regulation 18 Consultation in May 2017. Our representations outlined some of Tarmac's landholdings which would provide small scale sustainable housing development over the plan period. Tarmac believe that these development opportunities should form part of the strategies proposed in the Medway Local Plan.

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

Yours faithfully

R. Arwel Owen
Partner

email:

enc. Representations submitted on behalf of Tarmac

cc.

David Lock Associates Limited
50 NORTH THIRTEENTH STREET, CENTRAL MILTON KEYNES, MK9 3BP

www.davidlock.com e: mail@davidlock.com



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?

Tarmac supports Medway's *Vision* and is particularly supportive of planned growth delivering vibrant community life in town, local and village centres. This approach supports the achievement of objectives set out in paragraph 28 of the NPPF by ensuring that local communities are supported by providing local housing opportunities which support facilities within that community.

In order to fully fulfil the vision, the Spatial Development Strategy must recognise the role of both strategic and local growth opportunities. The Development Strategy does this, identifying smaller settlements such as Halling as locations which could accommodate modest development where constraints can be overcome. For that reason, Tarmac broadly support the Development Strategy and Policy DS2.

The four scenarios presented as interpretations of the Development Strategy provide, in our view, limited differentiation and in the absence of an up-to-date published SHLAA, make it difficult to understand the context in which the potential sites have been identified as suitable, available and achievable whereas others which may have been promoted through the 'Call for Sites' have not. It is clear however, that a substantial supply of land will be required to meet housing needs (as recognised by the Council), and which the forthcoming standard method for deriving housing need published by Government will establish a rigorous framework for ensuring that those needs are met. In that context, Tarmac's view is that both local and strategic sites will be needed to meet short- and long-term needs. This provides a basis for supporting the Development Strategy set out.

The role of small sites must not be underestimated. Paragraph 47 of the extant National Planning Policy Framework (2012) requires authorities to plan for both an immediate and longer-term housing land supply, whilst the draft revision to the NPPF explicitly proposes a requirement for local authorities to plan for small sites and to make effective use of land. The government's direction of travel demonstrates that deliverability of housing is central to policy objectives and that over-reliance on larger sites will not meet expectations for good plan-making, albeit recognising the role that such sites can play in the longer term.

Tarmac are therefore supportive of Policy DS2: Spatial Development Strategy and the identification of Halling as a location for sustainable housing development. However, Tarmac believes that land at Halling, as promoted in the Call for Sites, should form part of the site allocations brought forward to underpin the Development Strategy thereby meeting the objectives of the extant and emerging NPPF to ensure an adequate and appropriate supply of housing sites.

Question H1: Does the proposed policy for housing delivery represent a sound approach?

Would you suggest an alternative approach?

Policy H1 seeks to allocate a supply of sites for the plan period. The policy refers to allocations for sites and broad locations for development and that these allocations will be phased to ensure a supply over the plan period. We support the Council's recognition that the phasing of supply is important, and recommend that this is extended to recognise the small, medium and larger sites will be needed to ensure that supply is maintained. In the absence of a published



SHLAA assessing potential sites, and a trajectory providing for phased implementation, it is unclear whether the Council has identified an adequate supply capable of providing for phased release.

Tarmac's submission to the Call for Sites offers an opportunity to deliver a medium sized site capable of supporting Halling as a rural community, but appears not to have been taken forward as a potential allocation. The site is well located to the existing settlement and its facilities and makes use of land which was significantly despoiled during construction of Peter's Bridge. Tarmac's technical assessments indicate that adequate highway capacity and technical standards (including visibility splays) can be achieved to secure access to the site, and ecological matters are capable of being addressed. Notwithstanding the fact that the adjacent railway is in cutting next to the site, other development proposal granted planning permission by the Council (for example at Temple Waterfront, where Tarmac was the applicant and the adjacent railway runs on an embankment) demonstrate that acoustic matters can be dealt with through site design and if necessary by planning conditions. The site is therefore suitable as well as being both available and deliverable and should be identified as source of housing supply in the short to medium term.

From: [REDACTED]
Sent: 24 June 2018 22:10
To: futuremedway
Cc: [REDACTED]
Subject: Hoo St Werburgh

Categories: Blue Category

Dear Sir/Madam

I am writing regarding further housing on the Hoo Peninsula and feel this could be detrimental to the character and sustainability of our landscape. Also we do not have enough health services, schools, roads and transport infrastructure in order to support our community and for the house building in the future. For example, I have a friend who lives in Hoo, wanting a Doctors appointment,(she phoned back in May) she asked if she could pre-book as they had no appointments for that day, they said the first appointment she could have was in October!!! How disgusting is that. It will only get worse with more houses being built (Nightingale Close for example) The thought of having one of the Doctors surgery's closing in Bells lane was also worrying.

I also feel sorry for another friend who lives in Wall Close as her house backs on to what used to be fields where the BP club was. Now instead of watching foxes and rabbits, she has a 6ft fence at the bottom of her garden and will soon have town houses overlooking her garden. She says she stands in her garden and tears come to her eyes. This is affecting her mental health and her family.

I have lived in Hoo St Werburgh for 24 years, I wanted to live here because it was a lovely RURAL village and there were lovely fields where I could go for walks and bring up my 2 children who are now 24 and 26. But now it's turning into a town, traffic is getting worse, we had to put up with a collapsed road for around 12 weeks, that was horrendous. One day it took me 10mins to get out of Hoo because of this closed road and the traffic. Hoo comes to a standstill as there are not enough road infrastructures.

There is nothing left for the youngsters in Hoo to occupy themselves, the BP club has gone, this was the hub for the people of Hoo, Deangate golf club has gone and the Deangate sport club/running track has gone. The Bowls green was nearly taken!! thank goodness that has been kept.

What is there for the older people in Hoo, There is nothing, apart from Pottery Road hall, which is constantly being broken into and vandalised.

Stoke farm shop/restaurant has gone, houses being built on that land!

When I first moved here we had a maned Police Station, now we have nothing and the drug problem in Hoo, I feel, is getting worse.

I hope you will take my concerns on this matter into consideration as this will no doubt affect the lives of all the people on the Hoo Peninsular and our future generation.

Kind regards

Mrs J Brooks



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

24th June 2018

By email only to: futuremedway@medway.gov.uk

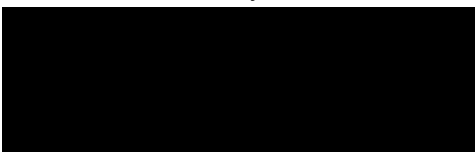
Dear Sir or Madam,

**MEDWAY LOCAL PLAN 2012-2035: REG 18 DEVELOPMENT STRATEGY
CONSULTATION: Representations in relation to urban logistics**

Please see attached representations which are submitted by David Lock Associates. Whilst informed by our activities on behalf of multinational logistics companies – operators, developers and funders – they are not submitted on behalf of specific clients or site-specific interests.

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

Yours faithfully



R. Arwel Owen
Partner

email: 

enc. Representations

David Lock Associates Limited
50 NORTH THIRTEENTH STREET, CENTRAL MILTON KEYNES, MK9 3BP
 e: mail@davidlock.com
www.davidlock.com



Question T13:

Do you agree with the proposed policy for planning for logistics in Medway? This is believed to be the first local planning policy of its kind. It has been prepared in response to recent sector articles calling for planning policy interventions. The council would welcome responses to refine or develop an alternative policy to support the growth of this sector in Medway.

What alternative approach would you propose for planning for the logistics sector and managing associated transport in Medway?

These representations are submitted by David Lock Associates and whilst informed by our activities on behalf of multinational logistics companies – operators, developers and funders – they are not submitted on behalf of specific clients or site-specific interests.

David Lock Associates are an independent town planning, urban design and masterplanning consultancy representing a range of logistics clients across the south east of England, Midlands and beyond. Our work includes acting for funding partners, developers and operators, supporting site identification and acquisition and providing planning and urban design activities in delivery. Our work supports the rapidly expanding and evolving logistics sector across the UK.

The Council draws upon profession commentary and research papers in proposing an *urban logistics* policy which recognises the changing face of property markets, planning policy, retail evolution and the interplay of those with the logistics industry. We support the Council's recognition of 'last mile' logistics as being an area of growing challenges and opportunities and commend the Council's innovation in proposing to address this through a bespoke urban logistics policy. There are clear spatial, social and environmental dimensions allied to the more widely recognised economic dimensions and these justify planning policy interventions to ensure that they are properly addressed.

In our work we have witnessed an evolution of the location, form and specification of warehouses in response to the seismic shift in retail distribution over the last decade. This change has been driven by global economic shifts, by automation, by changes in employment structures and in particular by the digital economy influencing how, where and when people shop, and more importantly their expectations for and of delivery. Whilst changes in the strategic distribution network are being realised, the complexities and interactions of 'last mile' delivery within urban environments is neither well understood nor is it being proactively planned for. The overall direction of planning policy, emphasising flexible conversion of space to residential uses has already affected the supply of office space in town and city centres, and this pressure is now extending to what has traditionally been considered 'pure' employment land. For that reason, we support, in-principle, the Council's stance in seeking to avoid the loss of small employment sites. However, the interaction with permitted rights which allow the conversion of B8 floorspace to residential (C3) uses needs to be carefully considered. Those rights rely upon a prior approval process which includes, at P2 (b) (iv), consideration of the importance of the existing employment function. Whilst those permitted rights are currently established as temporary rights, this policy should be capable of functioning effectively if those rights are extended or established on a permanent legislative basis – it could, in effect act as a basis against which prior approval is assessed. In order to fulfil that function, the evidence base to support the proposed policy will need to be fully established and integrated within both employment and town centre evidence.

maryott, kyle

From: [REDACTED]
Sent: 24 June 2018 23:02
To: futuremedway
Subject: Oppose development

Categories: Blue Category

I strongly oppose any future development of Rochester airport, and strongly support a public safety study.
A Bland
Get [Outlook for iOS](#)

From: [REDACTED]
Sent: 24 June 2018 23:16
To: futuremedway
Subject: Response to Development Strategy Consultation

Categories: Blue Category

Dear Planning Policy Team,

I write to comment on the proposals detailed in your Development Strategy Consultation document (DSCD) . I note that the summary document mentions an 11 May 2018 deadline for feedback. However, I hope the Medway website's deadline of Monday 25 June 2018 is correct, and will allow for my comments to also be taken into consideration.

Medway clearly faces a significant challenge in achieving its requirement for additional homes to meet both its own estimate of need or national government's targets. In order to meet the latter, the DSCD states the need for more regeneration sites to be developed. Meanwhile, the Strategic Housing Needs Assessment (SHENA) Baseline assessment of 2015 found that there was a 'misalignment of stock use' in Medway with 35.8% of households occupying larger units than they actually required.

As well as needing to encourage the development of new homes on greenfield sites, and the greater regeneration of brownfield sites, I think that Medway's existing housing Plan Policy H6: Flat Conversions should also be revised to better assist in increasing the supply of available, appropriately sized homes.

Paragraph 5.2.3 of the existing Medway Local Plan 2003 states the need to make “full and effective use of...land within existing urban areas, including...the conversion, improvement and redevelopment of existing buildings”. Paragraph 5.3.12 identifies that the conversion of generally older family houses to self-contained flats mean that “the existing stock can be adapted to contribute to meeting future needs and the growth in the number of households. It is also to be encouraged as a means of urban regeneration”. However, H6 as currently worded effectively means that there is little potential for these conversions to actually occur. The policy only allows house/flat conversions in areas where there is already a prevalence of self contained flats. This is very limiting and too restrictive. Enabling greater freedom to develop existing houses into flats, in a wide variety of areas, would contribute to an increase in supply of smaller accommodation that is required. These smaller units could be one of a range of incentives to households that are currently under-occupying to move into appropriately sized accommodation, as suggested by the SHENA. This policy change would also help increase the general housing supply and provide new units of accommodation, potentially helping to meet new housing targets.

I hope the above feedback will receive due consideration.

Regards,

Sandra Brown

From: [REDACTED]
Sent: 25 June 2018 00:39
To: futuremedway
Subject: Draft Local Plan Consultation

Categories: Blue Category

I am writing to give my response to the draft local plan.

I have lived on the Hoo Peninsula since 2003, in Lower Upnor, Cliffe and now in Hoo with my family. I work as a Practice Nurse locally in Wainscott and Cliffe Woods.

I decided to move from Bexley Kent to enable my children to grow up in a semi rural location, enjoying countryside living in a village, with smaller schools and the chance to live a similar childhood to myself before all the housing replaced open spaces and crime increased in the area I grew up in.

I understand the need for new homes and am not ignorant enough to say I disagree with all housebuilding however, the type of homes and number of homes required is of prime importance to me.

I have three areas of concern with this draft plan.

1. Destruction of our chosen way of life and of the individual character of the villages on the peninsula.
2. Lack of infrastructure and impact of future pollution from existing roads.
3. Failure to provide Health, Education and natural open spaces for the residents of the peninsula.

As mentioned I have chosen to live and raise my family on the Peninsula. The village of Hoo is ancient and as per the governments national planning framework, the sustainability of Hoo needs to be addressed and its character retained for generations to come. Comments made by a member of the council this year, informing the residents of Hoo that we should 'get used to living in a town' is both extremely unprofessional and completely inconsiderate of those living here. We pride ourselves on the village we live in and have welcomed new villagers over recent years but the number of homes has outgrown the facilities we have to accommodate a growing population. This is in contradiction to the governments planning policy.

Taken from the draft national planning framework. - '3. Supporting a prosperous rural economy
28. Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;
- promote the development and diversification of agricultural and other land-based rural businesses;
- support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and
- promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

Since 2005 a number of new developments have been built in Hoo and there are 3 further sites ready to start building over the coming months. Back in 2005 a Neighbourhood Plan was being developed however this did not reach fruition, but a number of comments within that plan are of particular interest. In 2005 it was reported that there was a greater than average number of elderly people living in Hoo compared to the rest of Medway. That there are no facilities for teenagers. That the doctors provide for the whole of the peninsula.

Since this time more homes have been built and the elderly population continue to increase. The teenagers still have nowhere to go and facilities which could have provided them with social activities such as football, cricket, golf, swimming pool, badminton courts have been lost at Deangate and the BAE social club and other local amenities such as the cricket pitch. The doctors continue to provide for the whole of the peninsula with no extra support.

As a Nurse I have first hand knowledge of the struggles faced by the NHS locally. The surgery I work for is under increasing pressure with a lack of GPs, something which is going to worsen as the number of GP's currently working in Medway are due to retire over the next 3 years. Our practice is coping, just, but is in part due to being a training practice and having extra hands in the way of Registrars to take some of the strain. The practice I am a patient at in Hoo does not appear to have this support to fall back on and in recent years, owing to the number of new homes being built in the village, the practice has had to close its books to new patients. It is almost impossible to get an appointment and this has led to much upset from the community who rely on this service.

The option to travel to Gillingham for an appointment is only available to those with a car. It seems preposterous that patients living on the peninsula are expected to travel a great distance to be seen by a GP due to the lack of service provision. Not only is this unacceptable for many patients it is not an environmentally considerate option either. There needs to be a walk in centre for the peninsula based on the number of residents living here already without consideration of further occupation.

Homes to be built within the villages should be of the type required for the village. Provision for elderly and young people wanting to get on the housing ladder is vital for our village to survive and thrive.

I do not want to live in an urban sprawl, where there are thousands of homes but nothing to keep the community thriving. Where people live in their homes and travel off the peninsula for work and social lives as there is nothing but houses and concrete.

Not only would this be detrimental to the nature, identity and overall spirit of the village it would have far reaching impact on the environment. From surface water drainage, increase in flood risk but in air pollution too. Four Elms dual carriageway already has extremely high levels of pollution and this will be intolerable for those living here should the number of homes planned be built without considerable transport links being built to reduce the number of cars using this dual carriageway everyday.

The bypass from Four Elms to High Halstow already has noise pollution equalling that of the channel tunnel rail link and the M2 motorway. It is unthinkable to imagine how 29000 new homes won't increase this to intolerable levels for all living here.

The loss of the golf course has also had far reaching impact. Not only for golfers but for those using the club for a place to meet up and socialise too. The lack of adequate provision for elderly members of the community is of great concern. Loneliness is a very real problem and removing community assets impacts many lives not just those wanting to play golf. Many of my patients who relied on the golf club for health benefits and companionship too, have been severely affected. It has impacted on their overall health and mental wellbeing. The closure will impact many people and in the future many more people will require input from healthcare as their inability to exercise and socialise will have long term negative impact on their lives.

Housing on this site would also impact the water table. The whole of the course has a risk of surface water flooding, this will have to go somewhere. A nature reserve/park much like Shorne Country Park with education centre, protection of our local wildlife including the growing population of Nightingales, cycle routes and activities for the very young to the elderly would be a perfect choice for this area. The options and positive impact such a place would have on the area would offer limitless opportunities for all. Many people travel off the peninsula to go to such places but the peninsula could have their own with housebuilding sympathetic to each village surrounding this community asset.

In summary, there needs to be consideration of the views of residents across the peninsular. Improvements to roads, local transport and reduction of pollution. To provide access to open spaces which addresses the health and wellbeing of all age groups, in a location that can be easily walked to, ridden to or accessed by public transport. Provision of healthcare which is adequate for everyone on the peninsula and does not expect people to travel off the peninsula to access. Provision of education places for every child to stay on the peninsula. Homes which are purposely built for the needs of each village across the peninsula. Homes built to retain the character of the village and ensure that each village is distinguished by individual identity. Protection of the wildlife and habitats of these important inhabitants of the peninsula.

I look forward to hearing more information at the meeting in Hoo on the 5th July.

Marilyn Mason


[Sent from Yahoo Mail for iPhone](#)

From: [REDACTED]
Sent: 25 June 2018 07:35
To: futuremedway
Cc: [REDACTED]
Subject: Future Medway Local Plan 2012 to 2035 Development Strategy Regulation 18 consultation report

Categories: Blue Category

For the attention of: Medway Council

Consultation: Future Medway Local Plan 2012 to 2035 Development Strategy Regulation 18 consultation report

Dear Sir/Madam

We have been made aware of the above consultation which closes on 25 June 2018.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case with particular reference to the A2(west) and M2 in Medway.

In April 2017 we responded regarding the Development Options consultation for Medway Local Plan, acknowledging that *"the plan was in its earliest stages where the level of detail is naturally insufficient to assess and mitigate the transport impacts. Consequently, we are not in a position as such to either object to or support the Local Plan at this point in time"*. Also that the next steps would include:

- the issuing of the modelling validation report for assessment,
- production of future development distribution scenarios,
- then forecasting the transport impacts of those scenarios and
- production of necessary scenario supporting mitigation schemes that enable the strategic and local networks to continue to function safely, reliably and efficiently

Whilst the model validation has occurred and we approve the use of the base model; the other elements are still outstanding and we are still not in a position to either object to or support the Local Plan at this point in time. We will require sufficient, proportionate, robust and up-to-date evidence so that we can understand the location, form and extent of any impacts the Local Plan will have on the SRN, (taking into account as appropriate the Local Plans and permissions in neighbouring areas); and hence any SRN mitigation that needs to be included in the Local Plan.

Having considered the Development Strategy Regulation 18 consultation report we have the following additional comments:

We note that an annual housing need for Medway of up to 37,143 has been specified over the plan period. This is a substantial increase to 1,665 homes per year compared to the 2015 SHMA figure of 1,281 homes per year.

- General : a number of Proposed Policies do not specifically mention impacts on the road network; for example Policy I9 Gillingham football club new stadium. In line with DfT Circular 02/13 The Strategic Road Network and the Delivery of Sustainable Development, Highways England consider that development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth. In framing its contribution to the development of Local Plans, Highways England's aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the SRN. Accordingly we would be interested in any proposals that may have an impact on the SRN and we look forward to further opportunities to comment on site specific matters at the earliest possible stage. We would expect to see any proposals coming forward to be supported by an evidence based assessment of traffic impact, outlining that the proposals do not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32).
- Policy I4 – Communications Technology – lists factors for considerations when assessing communications installations. This policy should also consider impacts on traffic flow and highway safety. Where such installations affect the SRN additional advice is provided in DfT C2/13 paragraphs A5 to A7 which state that the *"installations must not cause a safety or environmental hazard to any road users, workers, or any third party and it must not interfere in Highways England's ability to carry out either routine or structural maintenance. Neither should any harm be caused to the long-term integrity of the highway including pavement, earthworks, structures, drainage works and ancillary equipment"*. Also that *"all operations must be carried out without interference to traffic flows"* and that a full road safety audit is required.
- Policy T4 – Rochester Airport – we are already providing advice to the applicant on Rochester Airport and recommend that the policy states that proposals will need to demonstrate how any safety impacts should be mitigated.
- Paragraph 11.1 refers to technical transport assessments being carried out as part of the evidence base for the new Medway Local Plan and 11.21 refers to a Transport technical paper supporting this consultation – we note that this document could not be located as part of the consultation documents so could not be reviewed.
- Section 11.6 states that *"The council has commissioned a Strategic Transport Assessment (STA) as a key component of the evidence base. It is used to assess the existing situation and determine the transport implications of potential site allocations, providing an understanding of the cumulative and site specific impacts in terms of the capacity of the road network and the associated safety issues. The STA will inform strategic and specific mitigation requirements for sites allocated for development in the Local Plan."*

Highways England were consulted in the early stages of the STA and we would welcome an update on progress made.

- Section 11.71 states that *"The council has adopted guidance for TAs which promotes the use of its new traffic model, recently validated by Highway England."*

It should be made clear that whilst Highways England have approved the use of the new model Highways England have not validated the model.

- Policy T12: Managing the transport impacts of development states that *“The council expects proposals that will generate a significant amount of movement to be supported by a Transport Assessment. Applicants are encouraged to refer to the adopted Guidance Note for Transport Assessments”*.

It is acknowledged that the Guidance note alludes to consulting with Highways England however Policy T12 should emphasise that where a development impacts upon the SRN, the requirement for a TA or TS would need to be agreed with Highways England. In this case Highways England would need to be satisfied that development proposals will not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32). Additionally, Highways England would want to agree the scope of the TA or TS at pre-application stage in conjunction with the local highway authority. Reference to key Highways England policy documents that describe the approach we take to engaging in the planning system and the issues we look at when considering planning applications should also be made. Accordingly this section should list the following which provides advice on the information we would like to see included in a planning proposal, and outlines the support we can offer i.e. Planning for the future – A guide to working with Highways England on planning matters (Sept 2015) in addition to DfT Circular 02/2013.

We look forward to further opportunities to comment on these documents and other elements of the Local Plan for the transport network as the technical work progresses as well as site specific matters at the earliest possible stage.

I trust that the above is of assistance and, should you have any queries regarding our response, please contact us.

Kind regards

David

David Bowie

Area 4 Spatial Planning Team

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Mobile: [REDACTED]

Web: <http://www.highways.gov.uk>

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maryott, kyle

From: [REDACTED]
Sent: 27 June 2018 13:32
To: smith, catherine; futuremedway
Cc: [REDACTED]
Subject: RE: Medway Development Strategy consultation - Natural England response
Attachments: Medway Development Strategy consultation- NE response 22 June 18.pdf

Categories: Blue Category

Dear Catherine

I noticed there were a couple of formatting errors when converting the consultation response I sent on Friday to a pdf. I've resolved these and a pdf version is attached for your records.

Kind regards,

Patrick

Patrick McKernan
Manager
Sussex and Kent team
Natural England
Mbl: [REDACTED]

From: [REDACTED]
Sent: 22 June 2018 18:54
[REDACTED]
Subject: Medway Development Strategy consultation - Natural England response
Importance: High

<< File: Medway Development Strategy consultation- NE response 22 June 18.docx >>
Dear Catherine

Please find attached Natural England's comments in relation to the Development Strategy consultation and associated Sustainability Appraisal and Habitats Regulations Assessment.

Natural England welcomes the environmental commitments in the vision and strategic objectives of the Development Strategy, and we will continue to support the Council as it develops these principles in shaping its Local Plan.

Much of our advice, understandably, focusses on the potential allocations and impacts within and adjacent to the Chattenden Woods and Lodge Hill SSSI and we welcome the consultation including three alternative development scenarios which avoid direct impacts to the designated site.

As we discussed on Wednesday, Natural England remains committed to our joint vision of securing a sound local plan which facilitates growth whilst conserving and enhancing Medway's rich wildlife and landscape assets. We will of course be pleased to work with you over the coming months to help ensure we realise this joint vision.

We mentioned the possibility of pencilling in a date to continue our ongoing discussions on the Local Plan and mid to late July appear to work for us if this period is good for you and your colleagues.

Kind regards,

Patrick

Patrick McKernan
Manager
Sussex and Kent team
Natural England
Mbl: [REDACTED]

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maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 08:01
To: futuremedway
Subject: Medway councils local plan consultation

Categories: Blue Category

Dear sir/madam

I am writing to express my concern over the large amount of housing to be placed on the hoo peninsula particularly in hoo st werbergh. I feel there is insufficient infrasture to accommodate the plans and the recent closing of deangate ridge golf club was a severe blow to what was a key community site.

I strongly urge Medway council to reconsider their local plan.

Yours sincerely
Mr P Lewis

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 08:09
To: futuremedway
Subject: Local Plan proposal Relating to Rochester Airport Future

Categories: Blue Category

With reference to the proposals affecting Rochester Airport.

Any changes to the current arrangements projecting into the future must be properly studied with respect to Safety, noise, pollution and financial viability.

The closure of the cross runway will impact all of these leading to changes affecting residents and users of the local environment which must be understood and mitigated.

There should be no acceptance of the local Plan without prior full Public study of these impacts with mitigation locked in to the resulting local plan.

Regards

Peter Dickinson

[REDACTED]

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 08:20
To: futuremedway
Cc: k [REDACTED]
Subject: Hoo , Isle of Grain - Local Planning consultation response.

Categories: Blue Category

Dear Sirs,

Kelly Tolhurst, MP has highlighted the essential need of a strategic infrastructure plan to support the proposal for a large amount of housing in Hoo and the surrounding villages.

Our roads, medical facilities and schools are already failing to meet demands and as a resident of only 3 years I can already see the huge strain on the existing infrastructure.

I fully support Ms Tolhurst's local community campaign and ask you to please listen to our voices. It will be a shame to destroy our beautiful countryside, wild life and villages if the area becomes over developed and over populated.

Thank you.
Regards.

[REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 25 June 2018 08:28
To: futuremedway
Subject: Medway local plan consultation

Categories: Blue Category

Dear Sirs,

I am objecting to the proposal of the large amount of housing to be built in Hoo St Werburgh. The area is agricultural and most of this land is being swallowed up by new builds. Where is our food going to be produced?

As previously commented on by many residents the area does not have the infrastructure to support these plans.

The is only one road of of the peninsula which is frequently blocked due to accidents either in the village or caused by problems at Hasted Way and Four Elms roundabout. The recent road collapse in Bells Lane by house building leading to even more traffic problems for the village.

It is a three week wait to get a doctors appointment, how long we will wait when then population increases significantly?

We are constantly being told that we are in an area where we suffer from serve drought by Southern Water but you plan to increase demand substantially.

Finally we do not have enough school places to accommodate the increase of children, parents frequently have to transport their children to schools out of the village, thus increasing traffic problems once again.

S Eastwood