

From: [REDACTED]
Sent: 25 June 2018 10:12
To: futuremedway
Subject: Hoo Peninsula New Houseing Plans and Infrastructure
Categories: Blue Category

Hello

I'm writing this in response to a letter received from my MP, Kelly Tolhurst and regarding to the numerous amounts of housing estates that have and still are popping up around the Hoo Peninsula, particularly in close proximity in Hoo St Werburgh.

When I moved in to the area, Hoo was a lovely community with a village type feel where there were never any waits for appointments with Doctors or Dentists and the roads in and out of Hoo were perfect size for the population.

Several years have passed and Hoo has almost doubled in size with the new housing estates being built but the facilities just aren't available to match the size that Hoo is becoming.

We are losing the village fee and with the recent road issues at the top of Bells Lane where the road was closed for what feels like 2 months at least, added on to the road works on Main Road near the new school, the traffic entering and leaving Hoo has caused lengthy delays.

This is without adding further traffic from more estates like the one that's currently being built at the top of Hoo on the old BAE club land and any future houses on the fields to the West of Hoo which plans have been knocked back for at least the last 2 years. Adding that on to any future housing developments that are added further on to the peninsula would all cause major road delays on the dual carriage way heading onto and off of the peninsula.

I urge you to stop any future plans to add to the peninsula, but if any more housing estates pass planning permission, to get the infrastructure up to the job way before more housing estates are developed.

Thanks

Sean

Sean Braine
Corporate Software Trainer
[REDACTED]

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maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 10:35
To: futuremedway
Subject: Future Planning on HOO Peninsular

Categories: Blue Category

TO whom it may concern , I would like to voice my concerns the irresponsible way the council grants planning for new build not taking into account the impact it is having in Hoo , it would also seem that only certain developers are awarded contracts , there is also the question as reported in the local paper as to what happened to the money that was part of reason for granting the development of the old BAE club that supposedly was earmarked for Deangate, it has ben reported there are about 7 million unoccupied properties in the UK ,more emphasis should be put on getting people into these ,I wonder how many there are in Medway
Yours Faithfully
Derek Bennett

24 June 2018

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

Dear Sir / Madam

**Response to Medway Local Plan Development Strategy
Land at Siloam Farm, Rainham**

We attach representations prepared on behalf of the landowners of the site attached and set out comments in response to Medway Council's Local Plan Development Strategy).

We welcome the inclusion of this site in the Council's Development Option Consultation Document January 2017 as an area for urban expansion east of Rainham. We confirm that there is residential housebuilder with interest in this Site known as 'Land at Siloam Farm, Rainham' (hereafter referred to as 'the Site').

The site was initially put forward for consideration to Council 'Call for Sites' Strategic Land Availability Assessment (SLAA) in May 2014 as part of the larger development of a Site known as Siloam Farm (SLAA Ref: 0847). **The site is deliverable and available for residential development.**

The Objective Assessed Need (OAN) for residential development set out in the SHENA indicates a need for 29,4623 dwellings over the plan period. The Government's stated goal of delivering 300,00 new dwellings each year from 2021 will also result in a standardisation of the housing methodology. Therefore, the housing need figure will be 37,143 which the Council will deliver through Option 3 of the report.

The Site which is included in option 3, comprises a single land parcel to the east of Mierscourt Road and is approximately 35 hectares in size. It is private open land currently predominantly in equestrian use. The Site also comprises former agricultural buildings associated with the current use. The landform of the Site is generally level.

To the south of the Site lies Siloam Farmhouse. Further to the south of the Site is agricultural land which is known to have been promoted through the SLAA process for residential development. Immediately to the west of the Site lies the urban settlement boundary of Rainham, residential properties on Mierscourt Road and Mierscourt

Primary School (aged 4-11 children). To the north of the Site lies agricultural land which is also known to have been promoted through the SLAA/ SHENA process for residential development, including land to the east of Mierscourt Road and south of Oastview, which has planning permission for 136 dwellings under application reference MC/15/4539 (the Redrow Homes site). Further to the north of the Site is the settlement boundary of Rainham again and Rainham High Street (A2). To the east of the site is Meresborough Road. Beyond Meresborough Road to the east lies further agricultural land, some of which is again known to have been promoted through the SLAA process for residential development.

As such, whilst the Site is currently outside of the settlement boundary of the Medway urban area it is close to residential development, educational facilities and retail high street facilities further. Therefore, the Site lies within a sustainable location in close proximity to sites which have been put forward through the SLAA process to form a sustainable urban extension to Rainham.

The Site lies within an area defined by Mierscourt Road and Otterham Quay lane to the west, Canterbury Lane to the north, Seymour Road and South Bush Lane to the east and the M2 to the south. The area, which is predominantly small parcels of agricultural and equestrian land, is one of a limited number of areas immediately adjoining the Medway urban area that could accommodate strategic development to meet future housing needs set out in the SHENA

It is the landowners intention to promote the Site through the Local Plan for residential-led mixed-use development comprising a mix of dwelling types and sizes including an element of affordable dwellings. It is anticipated that a total of approximately 800-900 dwellings could be delivered on the Site subject to further testing in addition to car parking provision, open space and potentially a range of services and facilities. Access points to the Site can be obtained from Mierscourt Road with potential additional access onto Meresborough Road subject to further analysis. The Site is in a sustainable location within close proximity to the Medway urban area.

The site could be developed in isolation given its size, continuous road frontage, ability to provide a number of facilities on-site and location as a logical extension to the Medway urban area. However, the Site could also be developed as part of a wider strategic development to the east of Rainham.

On the question of the most appropriate spatial strategy for meeting the housing need, the Council will need to consider how to best complement existing and planning transport infrastructure, taking into account the likelihood that a large number of future residents will want to commute into work in London.

Therefore, a strategy focusing on regenerating the town centres and expansion of existing urban areas close to transport hubs would be a sensible one and would complement the direction of national planning policy (e.g. the Housing White Paper). This site meets the criteria as opposed to Chattenden Barracks that does not have the necessary infrastructure.

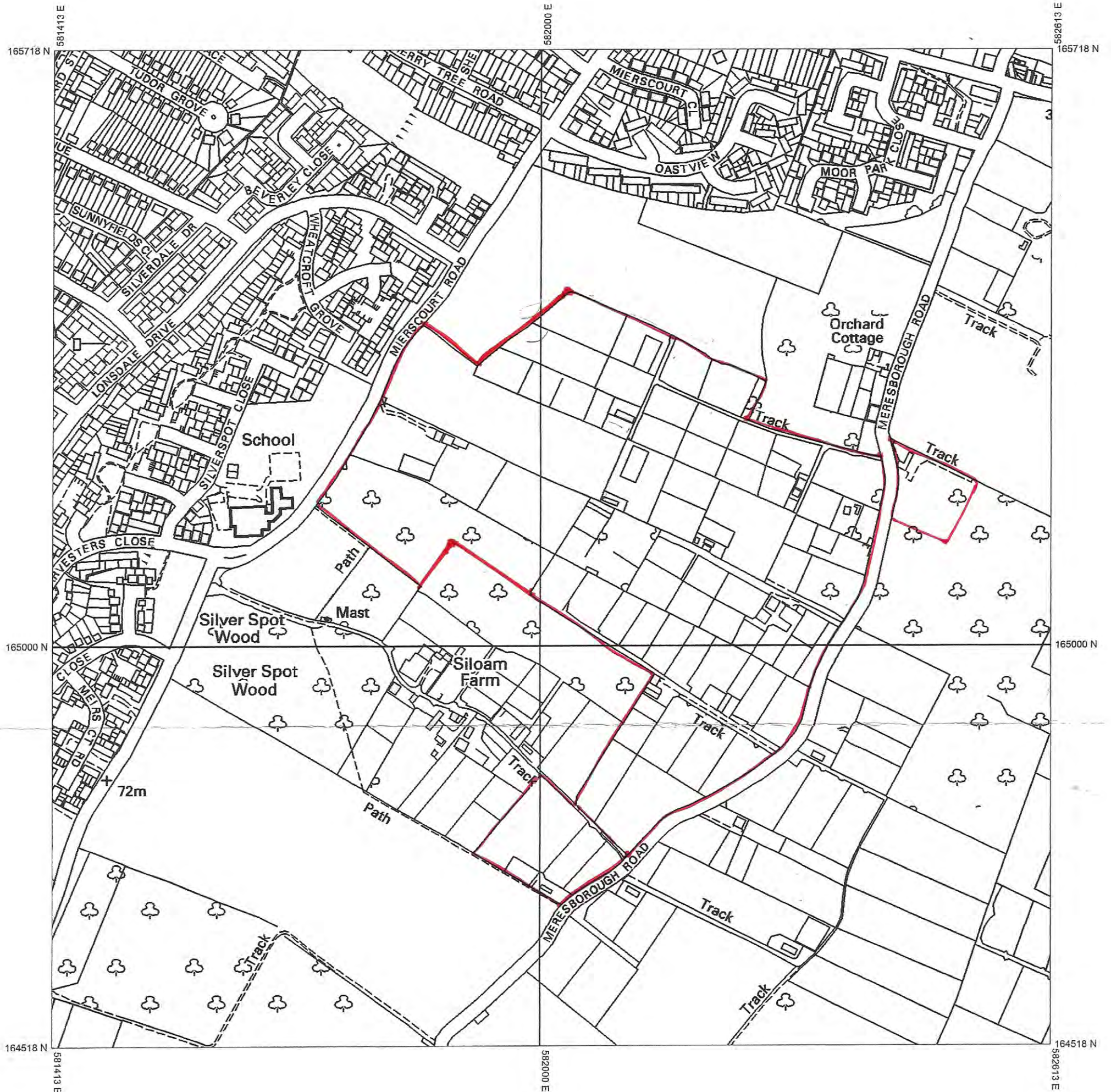
Equally, the scenario of allowing the Rainham urban area to expand, providing new homes in areas that are already attractive to residents, it would meet the demands of the market and this would ensure the deliverability of an important element of the overall housing need.

We trust this response will be taken into consideration in taking the plan forward to the next stage of preparation.

Yours faithfully,

A black rectangular box redacting the signature of the sender.

Andrew Street



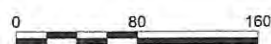
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The representation of features as lines is no evidence of a property boundary.



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Serial number: 001154902

Plot Centre Coordinates: 582013, 165118

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 10:38
To: futuremedway
Subject: Development of the Hoo Peninsular

Categories: Blue Category

Good Morning,

I would like to add my electronic voice, to the growing number of those who are against the unfettered expansion of housing estates on and around the Hoo Peninsular

I have seen many other housing estates across the South East - Chafford Hundred and Barking Reach in Essex, where there has been almost virus-like expansion with the necessary infrastructure to underpin and support this expansion.

I am not against expansion perse, however there must be adequate communication links, education, health and medical centres to cater for such expansion.

It there is no commitment to bolstering the supporting infrastructure around the Hoo Peninsula, then I in good conscience, cannot support the local plan respecting increased housing on the Hoo Peninsular.

Yours Faithfully,

Mark Buckle

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 10:45
To: futuremedway
Subject: PROPOSED NEW LOCAL PLAN

Categories: Blue Category

I wish to bring to your attention your council's decision on Planning Application MC2006 for the building of 6 detached houses on land at Middle Stoke. The refusal states the reasons as being the proposed development is contrary to several policies of the Kent and Medway Structure Plan 2006 and the Medway Local Plan 2003. I think the increase to 18 houses will be detrimental to this small village which has little or no amenities and will increase the already congested roads. The public transport on the peninsula is very poor and we already have a problem staffing the local doctors' surgery.

Mrs Frances Mercer





32 High Street West Malling Kent ME19 6QR



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

Date: 25 June 2018
Our Ref: MR M16/0903-02

By email only:
futuremedway@medway.gov.uk

Dear Sir / Madam

RE: MEDWAY COUNCIL LOCAL PLAN 2012-2035 DEVELOPMENT STRATEGY REGULATION 18 CONSULTATION REPORT

I am writing on behalf of my clients, Palm Developments and McCulloch Homes, the joint promoters of land to the east of Yokosuka Way, known as Riverview Park, Gillingham for a mixed use development.

Site and Proposed Development

Riverview Park is a large parcel of around 17 hectares of land used predominantly for paddocks. It lies approximately 2 kilometres east of Gillingham Town Centre and is bounded by the A289 Yokosuka Way to the west, the railway connecting the London to South Coast line to the south, Grange Road with a number of residential properties to the north, and Eastcourt Lane to the east.

My clients' land has recently been the subject of pre-application discussions with the planning team to bring forward a large scale mixed use development. The detail of the development is still under discussion and to be informed by a suite of studies assessing the specific needs for individual land uses, but broadly the proposals are for:

- Large scale residential development on the northern portion of the site, including potential for an Extra Care housing scheme for the elderly; the residential element to include the full policy requirement of 25% affordable housing;
- Office development on the southern portion, providing high quality new space complementary to that already on offer in and around Gillingham;
- Public open space, with children's play spaces, green buffers and landscaped areas throughout the site; and
- Direct highway access from Yokosuka Way.

The proposed development provides a unique opportunity to deliver a scheme in Medway that seeks to address the area's housing delivery constraints and provide a significant opportunity to deliver genuine employment growth, on a site sustainably located close to the existing town centre and neighbouring residential areas. My clients aspire to deliver a genuinely sustainable new neighbourhood, providing new housing hand in hand with new office space to deliver jobs for local people.

Providing a mixed use scheme in this location would deliver a highly efficient use of land to meet a variety of planning requirements, including those set out in this Regulation 18 consultation report for an additional 49,943sqm of office space over the plan period to 2035, meeting the need for greater 'knowledge economy' activity. This will secure a mixed-use development with benefits extending beyond the proposed residential area to the neighbouring wards, utilising and enhancing the existing local infrastructure for a sustainable development with the potential to deliver significant employment growth.

The office space are to be within walking distance of the Twydall housing estate and lower Gillingham, providing clear social and economic opportunities for these wards. The benefits of such an approach,

delivering a mixed use scheme close to the town centre will also assist with the aims and ambitions of the Local Plan by reducing the pressure on out-of-town locations for residential and employment developments, and in reducing out-commuting. The responses to the individual sections of the Local Plan Development Strategy consultation document add further detail to this.

National Policy Context

The proposed changes to the NPPF set out in the recent consultation draft (hereafter dNPPF) include a reformulated description of sustainable development. This, as before, encompasses economic, social and environmental ‘pillars’, but adds new emphasis on ensuring sufficient land of the right *types* is available to support growth, innovation and improved productivity. Many of the proposed changes in the NPPF follow this signal, seeking better decision making from LPAs and developers alike to foster an environment in which sufficient homes and other development can be brought forward at the right times, and deliver multiple benefits from land. The need to **positively seek opportunities** to meet an area’s development needs remains central to plan-making.

We support the indication that the Council will update its evidence base to take account of the 2016 based household projections due to be published this Summer. It will also be important for that update to take account of the proposed changes to the NPPF and PPG, including the proposed standardised methodology for calculating housing need and the draft Housing Delivery Test. The Government has announced that it expects to publish the final NPPF in July 2018, while the latter document is important as it sets a clear indication of the need and pathway for planning ambitiously and flexibly for housing development to be delivered, taking into account neighbours’ unmet housing need.

It will be important to consider the impacts of the new methodology for calculating need as this will *inter alia* include the widened definition of affordable housing and the new guidance on how to take account of housing affordability. The draft Planning Practice Guidance published in March indicates that constraints should not be applied to the overall assessment of development needs, as limitations such as housing market capacity, Green Belt or environmental designations are not relevant to assessing the scale of need, but “*considerations when assessing how to **meet** need*” (page 3, emphasis added). It is relevant to note that while Medway is approximately 23% covered by Green Belt and other designations which seek to restrict development, this is not unusual within the South East. Indeed, Medway is significantly less constrained than a number of its neighbouring Kent authorities, many of which have a much higher coverage of Green Belt – for example 77% of Gravesham and 71% of Tonbridge and Malling is covered by the Green Belt designation. Recent letters from the then-Housing Minister, Sajid Javid, have indicated that the constraint of Green Belt is not unique nor a barrier to producing sound plans that properly tackle housing delivery.

As noted at paragraph 3.7, the proposed formula for assessing housing need set out a significantly higher indicative figure for housing need of 1,665 dwellings per annum. While the Council has set out its concern that as, comparatively, one of the most affordable areas in the South East, the housing figure is too high, it is also important for the Council to recognise the difficulties local households have in accessing housing locally. The NHF Home Truths 2017/18 South East report identified a home price to income ratio of 8.9 for Medway, with an income of £55,874 required to access an 80% mortgage. To attract and retain a diverse workforce the Council must look to bring this affordability ratio down through measures in the Plan. As already noted, the proposed housing target figure of 29,463 homes to meet the objectively assessed need will require revision following updates to the evidence base.

Vision and Strategic Objectives for Medway in 2035

As indicated above, the NPPF and the proposed changes in the dNPPF, asks LPAs to plan positively to seek opportunities to meet the development needs of the area and as a minimum to provide for objectively assessed needs for housing. This means planning over the long term to meet the needs not only of today’s population, but the projected growth of an area and the needs expected to arise over the Strategic Plan period and beyond.

The Vision focuses on responding to the needs of existing communities, but this limits the scope of the Plan – a more flexible and ambitious Vision should seek to “*respond(ed) positively to the character of the surrounding environment and needs of ~~existing~~ its communities*”. We agree with and support the statement that “*Development will deliver investment and open up opportunities for Medway’s residents*

for better homes, jobs and services, and to lead healthier lives.” Only in choosing the most appropriate locations for development will the Council secure good quality investment.

The Plan’s Strategic Objectives should be carried through the whole of the Plan, maximising opportunities to deliver mixed, balanced communities within attractive neighbourhoods with access to high quality employment space, services and facilities that meet local needs.

Development Strategy

The Council recognises that *“as Medway grows, it is essential that the area secures the economic, commercial, community and cultural facilities fitting to its city scale”* (paragraph 2.3). Without significant development close to existing neighbourhoods, the Council risks too much of its growth coming from piecemeal developments which will not contribute cohesively to the area’s benefit.

It is important to recognise local concerns about the scale of projected growth negatively impacting on local infrastructure and services, and this needs to be fully reflected in how the Council approaches the development strategy and individual development proposals. The purpose of the Sustainability Appraisal that supports the Local Plan process is clear; plans should come forward comprehensively, knitting together residential, business, leisure and retail growth with appropriate infrastructure. The development strategy needs to be robustly defined to ensure opportunities look to develop for the long term sustainability of the area, and not for short term gains alone.

My clients’ land has previously been included within the Development Options consultation draft Local Plan, as a mixed use allocation as part of the urban regeneration strategy, with an iconic structure previously identified as establishing the *“new character of this area and [marking] the extent of the regeneration zone”* (paragraph 3.24). The Council had expressed support for the intention to develop a high density scheme with significant tower structures at the site, which is notable now for the proposed delivery of much lower levels with two- and three-storeys, whilst maintaining a significant level of residential development at a density that respects neighbouring areas.

It is notable that the Interim Sustainability Appraisal on the Development Options draft highlighted no significant effects arising from the development of the site, bar the need to *“address potential impacts from light pollution from proposed new GFC stadium”*¹ (Appendix 2 - Sustainability Assessment Development Options and Policy Approaches). The statement that the delivery of *“residential, leisure and retail services ... would increase investment in Medway, revitalising the central area, boosting the vitality of the town centres, and supporting new employment activities around town centres”* (pages 24-25), at a time when up to 850 homes were proposed, clearly shows that the development of the site can be supported.

The lack of published material setting out the Council’s reasons for excluding Riverview Park from the current Development Strategy consultation document is highly ~~concerned~~concerning, given its inclusion within all four of the previous development scenarios. As the site is not assessed within the 2018 Sustainability Appraisal it is not possible to understand why the site has been excluded. The Council should ensure that it publishes further information on this decision making process to allow a full appreciation of the Council’s approach to developing this plan.

Developing this land as proposed will deliver much-needed residential and office development at the heart of Gillingham, at a human scale and density that will integrate well with neighbouring areas. The land at Riverview Park should be included once more as a key allocation within each of the four development scenarios. As a site close to Gillingham town centre, with excellent transport access and significant benefits to the local community, it provides one of the most sustainable locations for major development in Medway. The inclusion within the previous consultation draft of the Plan highlighted this as a benefit of development of this land.

The decision to class the site as ‘unsuitable’ and therefore excluded from further investigation in the SLAA (2017) was only determined on the potential effects on a locally valued landscape (the Lower

¹ This was when the site was the subject of a previous pre-application submission and EIA screening (references MC/14/2099 and MC/14/2106) for a mixed use scheme including a multi-purpose stadium, retail uses, up to 700 dwellings and associated highway works. That development is no longer being pursued.

Rainham Farmland) and the removal of land classed as best and most versatile agricultural land (BMV). Land to the south of Lower Rainham Road, Wooleys Orchard (SLAA reference 749) is within the same landscape area and also classed as BMV land, and also has more constrained highway connections and an 'unacceptable' level of flood risk but is included as a potential allocation, calling into question the exclusion of my clients' land based on the same criteria.

The decision to exclude Riverview Park from further consideration based on the removal of land classed as best and most versatile agricultural land is unsustainable as a reason for excluding the site as a potential allocation due to its long term use for paddocks, while the landscape impact should be determined through thorough investigation and appraisal of designs. It is notable that the main description of the site within the SLAA sets out that *"the land appears to have been somewhat degraded by the equestrian uses, which has created a scrappy, low quality landscape, albeit with a semi-rural character."* The Council's existing planning policy also allows it to support development of sites within areas of valued landscape where this will bring social and economic benefits, such as meeting housing need and the delivery of employment land and employment during the construction period. The dNPPF adds a further caveat to the need to protect and enhance valued landscapes, now noting that this should be *"in a manner commensurate with their statutory status or identified quality"* (paragraph 169, 2018).

All four development scenarios set out in this consultation document have the potential, without appropriate infrastructure upgrades and mitigation planning, to exacerbate pollution concerns, in particular due to a number of the larger strategic site allocations potentially adding to out-commuting from the main towns. The development plan needs to reconsider the optimal locations in particular for employment land delivery to facilitate a more self-sustaining local economy with less reliance on new out-of-town business parks. Delivering development that allows local people to travel less to their places of work, leisure and retail relies upon the Council delivering a development plan that places less emphasis on the car. Mixed-use and multi-generational communities will secure this.

We consider that the effects of development at Riverview Park on the immediate and surrounding landscapes can be successfully managed and the site's development deliver an attractive new neighbourhood. Detailed studies by a number of specialist consultants, including a landscape architect, will be provided as part of a future application to demonstrate this. The allocation of the site will enable the Council to protect other sites across Medway which are expected to impact more negatively on the area's environmental and heritage assets. This site provides a logical extension to the town, and its allocation will ensure that the Council can safeguard more countryside locations on the outskirts of Gillingham. As recognised in the Plan, a quality environment can help boost the economy; in tandem with regenerating those areas across Medway where redevelopment can encourage fresh investment, the delivery of new, high quality employment space at Riverview Park will deliver a cohesive, landscaped scheme to attract businesses to Gillingham.

General Comments on Site Selection Process

As set out in the comments pertaining to each scenario, the site selection process undertaken by the Council to determine which sites are suitable for allocation is not transparent. The purpose of the statutory Sustainability Appraisal process is to *"to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."* (Planning Practice Guidance, Paragraph: 001 Reference ID: 11-001-20140306). This is intended to be an iterative process, undertaken so that the evidence underpinning the plan is tested transparently, with full recognition of potential environmental, social and economic effects.

The preparation of an SA is intended to be an integral part of the preparation of the Local Plan, informing the generation and testing of options – and **published at the same time as each Local Plan consultation**. The Council's failure to do so as part of this consultation is concerning, not least because it indicates that the Council may be retrofitting its evidence base to fit its preferred development options, contrary to what is stated within the Cabinet report (8 March 2018) which states that the development scenarios *"represent the outcomes of this assessment work on what represents the most sustainable approach to managing growth, with potential alternatives being presented for further testing through consultation"* (paragraph 4.2). It also reduces the ability of those parties interested in the Plan to understand and respond comprehensively to its contents.

While the Habitats Regulation Assessment (HRA, March 2018) does consider the potential allocation of Riverview Park, this is only on the basis of its use for delivery of a new stadium, with no assessment of other options, including the delivery of a large-scale residential and office development. This omission is troubling given the timings of the pre-application discussions with the Council on those proposals, which the Council has failed to reflect in the evidence base supporting this Plan. The clear ‘competing’ sites with Riverview Park in the HRA are those on the Hoo Peninsula which are all within the North Kent Marshes Functional Land Impact Risk Zone. As such these may contain habitat that is of value to qualifying features of the Medway Estuary and Marshes, Thames Estuary and Marshes, and the Swale SPA/Ramsar sites, such as dark-billed Brent geese, with evidence (Natural England commissioned report NERC082) that this species specifically is increasingly grazing on cereal crops and oil seed rape in the winter. Recent surveys show that Riverview Park does not contain such habitat, but in the absence of site specific surveys for the land at Hoo this is at best unproven, with aerial photographs alone suggesting that such habitat is present extensively around Hoo.

There is no clear audit trail setting out how individual sites, including Riverview Park, have been excluded from the development scenarios now set out in this consultation, and whether reasonable alternatives to those scenarios have been tested at all, and to the same level as those options now set out within the Development Strategy. With the publication of the SA not coming until 26 April 2018, it is difficult to see how the SA could have informed the site selection, refinement and publication of the Development Strategy proposals.

Scenario 1: Meeting Objectively Assessed Need

As already recognised in the Plan, the Council’s figure of objectively assessed need is due to change, to reflect the new method for calculating this figure and an update to the national projections this summer. Whilst this approach recognises the need to redevelop and regenerate Medway’s brownfield land, it is important for the Council to be ambitious in its approach to minimise its impact on the most important protected areas, such as the SSSI, as well as directing growth to the most sustainable locations. This scenario represents a ‘bare minimum’ approach to planning for Medway’s future growth, and should be expanded to more proactively seek out the best and most versatile sites for development.

Riverview Park presents just such potential, unlike for example the development of the sites at Capstone Valley (SLAA references 783c North and South, and 783d) which the SLAA reports has poor access to existing services and facilities, is in an area of locally valued landscape, and with potential significant effects upon designated heritage assets. It is surprising that a site with a greater level of significant negative effects has been retained as a potential allocation within the Plan whilst Riverview Park has not. This has reduced the public’s opportunity to take a broad view of development opportunities available to the Council across Medway, and unfairly lead to the inclusion of development on the SSSI within Scenario 4.

The development proposals at Hoo will significantly affect how ‘green’ Medway is, pushing development further out of the main (more sustainable) urban areas to what is a rural town, based on “*opportunities to upgrade infrastructure and services to enhance sustainability*” (paragraph 3.14, Cabinet report 8 March 2018); this is not the way in which national policy expects local planning authorities to respond to the best opportunities for growth, and to prefer land of lesser environmental value (core planning principles, NPPF paragraph 17).

The development of sites around Hoo also rely on the delivery of the Strategic Access Management and Monitoring Strategy for the three SPAs via contributions from each development; there is no guarantee that the implementation of this strategy would deliver land to which new residents would visit preferentially over the SPAs. By contrast Riverview Park is located in close proximity to the Riverside Country Park, an existing facility with a proven record of attracting visitors and to which an increase in use is being actively promoted by Medway Council. Indeed, a recent study stated that it may be that existing areas with high levels of access, such as Riverside Country Park and the Strand, Gillingham, may warrant consideration for absorbing additional recreational pressure.

The significant level of development proposed at Hoo St Werburgh relies heavily upon the ability to upgrade the local transport network, with a substantial level of funding required to achieve this. The SLAA notes for one of the parcels (reference 1065) that “*Whilst it is possible that strategic infrastructure upgrades may address these congestion issues, improving access to the urban distributor network,*

there are no upgrades planned or identified at present”, whilst parcel 1084 continues to be in active arable use. It is clear that the developments at Hoo require a considerable level of additional investigation not only of site capacity, but viability with the required infrastructure upgrades before allocation can be justified. It is also a serious concern whether the Council’s ambitions to sensitively plan growth around Hoo St Werburgh *“to respect the countryside setting and links to the wider estuary”* can be achieved with the substantial level of development required to deliver sustainable growth at the town in the long term. Delivering development elsewhere in Medway will negate the need to mitigate the impact of development at Hoo on important environmental assets, as acknowledged by the Council.

Scenario 2: Investment in Infrastructure to Unlock Growth

The delivery of a scheme of residential and office development at Riverview Park will deliver significant benefits to the local community, aided substantially by the existing transport infrastructure serving the site at Yokosuka Way. While other sites set out within each of the four scenarios require upfront infrastructure delivery which may take a significant period to come forward, a particular problem described in Scenario 2, the development of Riverview Park is expected to be able to come forward without the need for significant infrastructure alterations or with contributions by third parties or through Government funding.

Due to the site’s existing infrastructure links it can come forward in a much shorter timescale, boosting the delivery of housing to meet local needs. Whilst the Council has been successful in the first round of bidding for funding from the Housing Infrastructure Fund, this funding alone will not unlock early delivery of development on the Hoo Peninsula and a wider range of development options should be considered to allow for the greatest level of flexibility over the Plan period. The dNPPF has placed greater emphasis on this in setting out the need for policies to be flexible enough to *“accommodate needs not anticipated in the Plan ... and enable a rapid response to changes in economic circumstances”* (paragraph 83). Including Riverview Park as an allocation alongside those other options will enable the Council to take that flexible approach to managing housing and economic development across the Plan period.

Scenario 3: Meeting Government’s Proposed Calculation of Local Housing Need

The level of housing need provisionally calculated by the new calculation methodology is challenging, but this should be viewed as an opportunity by the Council to review all of the SLAA sites afresh, taking account of the varying levels of sustainability and ease of delivery. Directing development to sustainable locations should include reconsideration of Riverview Park as one of the most accessible and deliverable sites in Medway which can come forward in advance of those sites requiring a longer term strategic approach. Its position alongside existing neighbourhoods, with the plan to deliver significant levels of office space alongside substantial levels of landscaping and open space, and the longer term potential for the delivery of a new rail station to further increase this site’s accessibility, make this a prime site for allocation.

Contrasting with this is the proposed introduction of a passenger rail service to the Hoo Peninsula, which relies upon very significant levels of public funding; even with this coming forward, the timescales for such funding and the delays to delivering housing make this a less suitable option for allocation, or one requiring a much longer term approach. This area of Medway is less accessible, and the Council’s focus on providing a new railway station is difficult to align with the need to develop a greater level of housing and economic floorspace across Medway and to meeting those needs quickly.

By adding Riverview Park to the options for development the Council will recognise again the sustainability of that site with its short distance of just 2 to 2.5km to the railhead at Gillingham station, and with the opportunity to deliver a walkable neighbourhood linking with the local cycleway. The allocation of Riverview Park will recognise its ability to contribute to strengthening the local economy and attracting new investment, providing high quality employment space to support job growth and reduce out-commuting. It will also be providing high quality new housing in a large enough quantity to deliver new services and facilities to complement the existing local offer, and integrate with neighbouring areas. As a reasonably large scheme of around 450 homes the site can deliver a good mix of house types, sizes and tenures alongside the proposed services and facilities, contributing to the delivery of a mixed and balanced community.

As noted elsewhere in this representation, as the scheme would create a new access onto the A289, Yokosuka Way, significant infrastructure remodelling is not necessary to facilitate delivery and any effects on air quality could be mitigated on-site. The site is also already served by a high frequency bus service which runs every 10 minutes along Beechings Way – while this is 400m from the south western corner of the site it is not a remote rural location and there is scope to improve bus accessibility. Approaches are being made to local operators to discuss options to extend services into the site – this is more achievable in the short term than delivery of new passenger railway lines elsewhere in Medway.

Importantly, the Habitats Regulation Assessment (HRA, March 2018) recognises that Scenario 3 *“presents the worst-case scenario in terms of predicted increases in traffic flows and therefore the greatest increase in NOx concentrations at Medway and Thames Estuary and Marshes SPA/Ramsar and North Downs Woodlands SAC.”* (page 51). Scenario 3 is the ‘least preferable option’ in large part due to these serious effects, and clearly requires further consideration of alternatives as the requirement to deliver housing to meet local housing needs must be a priority. The delivery of a healthy development plan relies upon the Council presenting those development options that will be most sustainable, with sites that have existing access to key infrastructure, including services and facilities that reduce the need for residents and visitors to use cars to meet their needs. The allocation of land at the Capstone Valley and around Hoo and Rainham will not fulfil this need, instead encouraging people to travel to work by car; the Council needs to review this strategy in light of the existing concerns about poor air quality in Medway.

As the Council is looking to adopt the Plan by 2020, this will fall outside the likely transitional period for implementation of the new NPPF. This scenario therefore represents the most appropriate response to the proposed changes to national policy, and should be taken forward with greater consideration as to how to deliver a plan that seeks to meet the high level of housing need identified by the new assessment.

Scenario 4: Consideration of Development within Lodge Hill SSSI

This proposed scenario is potentially the most damaging, proposing so clearly to develop on SSSI land which national policy elevates to the highest level of protection. The inclusion of areas within this proposed allocation designated as SSSI is clearly contrary to proposed **Policy NE2** which states that the Council will *“promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks.”* Development on land designated as SSSI will lead to significant harm to the land and the purpose of its designation - harm that Natural England has drawn attention to as requiring further study. The withdrawal of the previous planning application on the land for up to 5,000 dwellings clearly reflects the importance of the site.

The benefits of development on the land must **clearly** outweigh the adverse impacts for this to warrant allocation of the land; the Plan notes that *“Only where development cannot be avoided, should mitigation and compensation measures be considered.”* (paragraph 3.58). As there are many other opportunities to deliver housing and other development across Medway, this option is considered to fail this test. As with our comments above in relation to Scenario 1, it is surprising and unfair that the Council has excluded Riverview Park from each of the four scenarios while claiming that the potential to develop on a SSSI has been included *“so that a transparent and objective assessment of the impacts arising from potential development can be made”* (paragraph 3.59). We consider this to be a disingenuous approach to consulting on development options, failing to recognise the wider number of opportunities available for discussion.

Overall, Riverview Park represents a development opportunity that compares favourably in respect of ecology with that presented in Scenario 4, with the Sustainability Appraisal (April 2018) noting on the proposed allocation of Lodge Hill land that *“the Scenario would result in the direct loss of high-quality biodiverse habitat, which is designated as a SSSI, as well as high-quality agricultural land.”* ... *“The scenario promotes development on rural, greenfield land as well at Lodge Hill SSSI, which will contribute to habitat fragmentation and will directly impact upon notable and protected species.”* (Page 36) The allocation of Riverview Park would avoid these effects and would clearly be preferable on the basis of the avoid, mitigate, compensate hierarchy that underpins paragraph 118 of the NPPF. The proposed alternative set out by the Council to Lodge Hill, land west of Lower Stoke (SO8), identified

within the SHLAA as 'unsuitable', would also be a less attractive and sustainable location for development than Riverview Park due in large part to its location.

Unlike the development envisaged under Scenario 4, a suite of ecological surveys have identified no overriding ecological constraints to development of Riverview Park. This does not contain any habitat which would be suitable to support the bird species for which the Medway Estuary & Marshes is designated, nor is it adjacent to any such habitat. Habitats identified within Riverview Park include buildings, hard-standing, ephemeral vegetation, improved grassland, tall ruderal, poor quality hedgerows, scrub and non-orchard trees, all of which are of low intrinsic ecological value and represent habitats which are common both locally and nationally. The existing orchard habitat has also suffered from an extended period of high horse-pressure resulting in severe negative impacts on the structure and health of this habitat type, in particular the orchard trees, ground flora and invertebrate fauna. Similarly, faunal interest identified on the site has been found to be limited to intermittent badger residence, scattered recordings of individual or small numbers of slow worm and common lizard, a nesting bird assemblage that indicates that the site is of no more than 'local' importance for this group and low levels of bat activity predominately by common and soprano pipistrelle bats. This contrasts starkly with Scenario 4 which is likely to have "*significant adverse impacts*" (SA, 2018) on notable and protected species. The inclusion of development on Lodge Hill SSSI is baffling when considered against the remaining scenarios and the exclusion of other sites from this consultation document, including Riverview Park.

Furthermore, accessible on-site public open space, to include a 'dog friendly park', where dogs can be let off the lead, taking Natural England's ANGSt standard as a guide, is being considered within the masterplan for Riverview Park. Such areas are to be designed to provide readily accessible space for recreation and dog-walking to preferentially attract new residents away from the Medway Estuary & Marshes designations. Again, this provides a clear contrast with the assessment of Scenario 4 within the Sustainability Appraisal, which comments that development of Lodge Hill SSSI "*would seek to enhance areas where people can appreciate wildlife and wild spaces, however improved access to sensitive areas could increase disturbance and lead to negative impacts on biodiversity. The Scenario advocates for mitigation and compensation of impacts both on and off-site, which seeks to protect vulnerable habitats and species but there is still a risk that mitigation will be unsuccessful.*" (page 36).

The Council is seeking to deliver an employment-led Plan that puts economic growth at the forefront of development proposals, integrating with the expected residential growth to deliver a stronger, more resilient local economy. The Issues and Options consultation encouraged an employment-led approach, supporting the (now withdrawn) application for 5,000 homes at Lodge Hill on the proviso that this was to be accompanied by 43,000m² of employment land. The Council's Development Brief for Lodge Hill (2012) and the committee report for that application (MC/11/2516) note that there is a need to provide a large scale scheme which can deliver the critical mass of housing and employment land that will be self-sustaining and support delivery of key infrastructure. This cannot be achieved with Scenario 4, which sets out a piecemeal approach to development at Lodge Hill that cannot secure the necessary infrastructure nor employment focus that the Council is seeking, failing to secure the critical mass needed to support such development.

The Sustainability Appraisal raises concerns with this Scenario 4, noting that "*Regeneration of urban sites will increase investment into urban areas and town centres and co-locate people with economic activity. This will have indirect benefits which increase over time to Objectives 3 and 4. However, the scale of the proposed rural town with Lodge Hill and Chattenden Village may increase competition between town centres and decrease footfall from Chatham, which is a prioritised town centre for growth. Long-term effects against Objective 4 are therefore unknown.*" (Page 36)

While development of Riverview Park will not deliver the same number of dwellings as those proposed at Chattenden Village and Lodge Hill Camp, it will offset the need to push development out to such sensitive sites, while also offering early delivery of housing as part of a mixed use scheme. The services, facilities and landscaping opportunities at Riverview Park offer a far more sustainable opportunity than that set out in Scenario 4.

The master planning approach being undertaken to the design of Riverview Park by contrast responds to its local context, proposing a significant level of office space adjacent to the railway line which neighbours the existing industrial estate at Beechings Way, and the delivery of a 'walkable'

neighbourhood with cycle and other transport links to surrounding areas. The development proposals at Lodge Hill and Hoo St Werburgh require substantial funding to upgrade the local road and associated infrastructure network to mitigate the transport and environmental impacts, as well as other key infrastructure including “*transport, health, education, leisure and open spaces, and wider community facilities*” (paragraph 3.14, Cabinet report, 8 March 2018). By contrast, the development of Riverview Park can be delivered without external funding and early modelling suggests minimal local impacts on the road infrastructure, while the site has existing access to a good quality network of local services and facilities which development here will support and complement. This development can also be delivered early in the Plan period, utilising and enabling the expansion of existing public transport networks and securing sustainable development in the heart of Medway.

Policy DS2: Spatial Development Strategy

This policy should be reformulated once the Council has reappraised the full breadth of land opportunities available across Medway, including Riverview Park, to ensure that the strategy reflects the most appropriate response to Medway’s housing and employment needs.

In response to **Question DS1** the most sustainable approach to managing Medway’s growth would be to centre development around the urban areas, with the focus on regenerating brownfield land benefiting from further allocations at Gillingham, Chatham, Rochester and to an extent that will not have significant adverse effects on the SSSI, at the Hoo Peninsula. We propose allocation of Riverview Park for development of around 450 homes, large-scale office space and public open space, as part of the final Plan strategy.

Housing

In response to **Question H1** it is difficult to comment as the Council has not yet identified the final housing targets for the Plan, nor finalised the site allocations. Once these matters have been more fully resolved **Policy H1** should list the major site allocations and the target housing and other development expected to be delivered on each.

In response to **Question H2**, **Policy H2** should be amended to make reference to the ‘most up-to-date evidence of housing need’, rather than referencing the SHMA or any future updates as this fails to reflect the full breadth of evidence available to support applications for residential development, including smaller scale housing needs surveys and evidence from HomeChoice.

The reference to ‘sufficient consideration’ being given to the provision of self- and custom-build homes within **Policy H2** is too ambiguous and should be amended to ask instead that developers give consideration to such provision.

In respect of the reference within **Policy H2** to the Council working with ‘partners’ to facilitate the provision of ‘suitable’ specialist and supported housing for the elderly, disabled and vulnerable people, we ask that this be removed as this is replicated in **Policy H4**. The way in which specialist and supported housing and care comes forward and is dealt with by the planning system can be very different to applications for market and affordable housing. Similarly, the text on provision of Gypsy, Traveller and Travelling Showpeople accommodation should also be removed as this is covered within **Policy H10**.

As noted, further viability work is needed to support the Council’s approach to securing affordable housing, taking account not only of the widened definition of affordable housing as set out in the draft NPPF, but also the final housing target figures and site allocations. The tenure split of 60% affordable rent and 40% intermediate affordable housing set out at **paragraph 4.13** will also have to be amended to reflect those matters, and also to reflect the diversity of needs across Medway and deliverability on individual schemes.

In response to **Question H3** it is difficult to respond as the Council expects the background evidence to be updated which may result in significant amendments to **Policy H3**. The lack of publication of key evidence as part of the current consultation has also hampered our ability to interrogate the Council’s justification for its decision to set the current thresholds. Once that evidence is published the Council should allow for further consultation to enable a fuller response to be made to **Questions H3** and **H4**.

It is important that the Council recognise the potentially significant element of 'hidden' need or aspirations for Extra Care housing, as highlighted by the SHMA (2015), as the provision of such housing has multiple, significant benefits not only for individual households but more widely for communities. The delivery of such schemes is essential to delivering a more flexible housing stock and meeting needs for specialist accommodation. The Council should reconsider the wording in **Policy H4** asking that new developments not *"lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area."* In response to **Question H5**, there is nothing in national policy to support the approach as currently set out in this policy and this wording will lead to an unnecessary focus on 'concentrations' rather than the benefits of individual schemes on their merits and cause delays to otherwise commendable schemes. This wording should be removed from the policy.

It is commendable that the Council aims for Medway to be a dementia-friendly community; delivery of specialist housing and care schemes as part of new strategic development across Medway needs to be prioritised to meet the increasingly ageing local population. In response to **Question H6**, we support the inclusion of such a policy within the Plan, but suggest that this could go further in setting a target for the delivery of housing and care schemes over the Plan period. With regards to **Question H7**, it would be beneficial to request that large residential schemes include provision of specialist and supported housing as this would help to boost supply and allow for these to be distributed across Medway, as with the delivery of my clients' land which includes an extra care scheme, contributing to the development of a sustainable neighbourhood.

The potential requirement for all development proposals of over 400 dwellings to provide a set percentage as self- or custom-build plots is commendable, but has not been translated into policy. In response to **Question H17** we expect the Council to include such a requirement within its viability appraisal, and evidence that the 5% requirement is related to demand already identified in Medway, such as that drawn from the self-build register.

In response to **Question H18** a twelve month marketing period is likely too onerous, and out of step with similar requirements set out in Section 106 Agreements and marketing exercises for employment land. We propose a shorter period of just three months for expressions of interest and sale of plots; as the Council has an up to date register of persons interested in self- and custom-build plots, a longer period should not be necessary to market forthcoming plots. With regards to **Question 19**, similarly we suggest a shorter period of two years to complete individual properties, with a set period of 3 months for the Council or Housing Associations to acquire that plot, after which the developer may build or sell that plot without restriction.

Employment

The Council acknowledges that Medway's *"economy and skills levels are weaker than competing areas"*, with *"marked inequalities in health"* (paragraph 2.4) and that the Council's ambitions should *"seek to realise the added economic value that a city should provide"*. Recent signs of strengthening of the local GVA is encouraging, but needs to be supported by appropriate and ambitious development to fully support Medway's economic potential by enabling existing businesses to grow and attracting new businesses to the area.

The South East LEP Strategic Economic Plan (2017) recognises each local planning authority's strategic priorities – for Medway this includes targeting priority sectors as part of the Kent and Medway Growth Deal. To enable the provision of state-of-the-art commercial space, Medway Council needs to ensure it is targeting growth on those locations able to support such space, considering accessibility, existing infrastructure provision, and proximity to a diverse and skilled workforce. To consolidate the town's links with the universities at Medway and its student populations, as set out at paragraph 2.37, it will be important for Gillingham to provide new, high quality employment space to encourage investment and business growth locally.

The Employment Land Needs Assessment is now fairly dated, having been published in 2015, however its findings continue to inform the Council's development strategy, using the employment growth projection of 17,000 jobs to identify the employment land needs. The Development Strategy notes that *"although there is a potential surplus of employment land available in Medway, due to the particular offer of the large strategic sites on the Hoo Peninsula, the land supply does not align well to meeting*

the full range of business needs projected over the plan period.” It goes on to state that “*consolidation and intensification of existing employment sites [could] provide the right offer*” (paragraph 5.18) alongside employment sites on the edge of centres. The statement that “*mixed use schemes ... could deliver well serviced, flexible office spaces close to town centres and with good quality ICT connections*” would be “*critical to securing greater ‘knowledge economy’ activity*” is not then supported by this consultation’s development strategy which patently ignores the development potential at Riverview Park.

The development on the Hoo Peninsula is signalled as having potential to provide new “*attractive employment floorspace*” (paragraph 5.18), however this also fails to acknowledge the sustainability issues of developing in this location. This includes the lack of a passenger railway line and the absence of a bus stop at the town, forcing considerable infrastructure upgrades at the town – as previously identified as requiring substantial upfront funding with all the associated difficulties and time constraints that poses. The area would require a significant level of development to support attractive businesses, and would add to the out-commuting from Rochester, Chatham and Gillingham, generating additional traffic congestion and leaching investment away from the main urban areas. This strategy would place more pressure on local services with no significant commercial income, at least in the short term given the time required to develop such employment space, entering the local economy to support those services.

As set out in relation to the individual development scenarios, the delivery of a mixed residential and office development at Riverview Park will support the local economy, providing an **attractive, accessible site for high value business growth**, supporting the Council’s employment aims. The development strategy set out in this consultation document does not provide the critical locations for delivering the employment floorspace required, and while the Cabinet report notes that this will be set out within the Draft consultation, this is a significant omission from this consultation on the emerging Plan. This seriously undermines confidence in the Council’s ability to implement **Policy E1** which should allocate key locations for new employment land development to “*accrue benefits for Medway’s economy*” from developments **within** Medway.

Natural Environment and Green Belt

As noted elsewhere in this representation, the proposed development of sites around Hoo relies on the delivery of the Strategic Access Management and Monitoring Strategy for the three SPAs via contributions from new development. The implementation of this strategy is not a certainty and it is also difficult to ensure that the delivery of new land would encourage new residents to visit those sites preferentially over the SPAs.

The assertion that “*The council will promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks.*” is not borne out by the Council’s four development scenarios, and so while **Policies NE1, NE2 and NE5** in theory set out a positive approach to managing the natural environment, including internationally important habitats, this is not supported by the Council’s proposed allocations which must be reconsidered.

Policy NE4 should be supported by a fully updated Medway Landscape Character Assessment and Green Infrastructure Framework now, during the consultation on proposals for the Plan, and not be left for future publication. Without this document the Council’s evidence on the optimal development sites and guidance for those sites’ delivery is not plan-led. The Council should ensure that publication of that document is prior to further consultation on the Plan.

The approach set out in **Policy NE8** to restricting development where this will reduce exposure to areas of poor air quality is contradicted by the four development scenarios set out in this consultation draft Plan. While the policy expects the effects of development to be mitigated, the allocations defined by the Plan need to be driven by the known and predicted effects of that development, including the impacts on air quality.

Directing development to those areas which will have the least impact on air pollution is important for the long term health and wellbeing of local residents, and a significant part of this will be taking a holistic view on the delivery of development, ensuring that residential schemes are close to existing services

and facilities. In this way the overall development strategy can reduce out-commuting from the main settlements and encourage greater use of public transport, contributing to a longer term achievement of the Council's Air Quality Action Plan – the aim of which should not merely ensure no worsening, but work towards overall air quality improvements.

Built Environment

In response to **Question BE1** we consider that **Policy BE1** can be amended to remove reference to the Lifetime Homes, Building for Life and BREEAM standards which have been superseded by more recent Building Regulations.

Policy BE4 is an appropriate response to the Government's recent indications, including in the recent consultation draft proposed changes to the NPPF, that housing density should be responsive to local circumstances and intensified wherever necessary and desirable to achieve good quality place-making and higher housing delivery. To respond more clearly to the changes in the proposed NPPF it would be useful for the Council to set out housing density ranges it expects for different areas, as per proposed paragraph 123:

- "a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*
- b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range;"*

The reference at the end of the policy to achieving a mix of house types should be removed, as this is already covered in **Policy H2**.

Health and Communities

The difficulties local communities have in accessing healthcare and in being able to lead a healthy lifestyle aided by access to green infrastructure in walkable neighbourhoods are well recognised by the planning system, and problems which can be mitigated through new development. The proposed scheme at Riverview Park is aimed at tackling such issues in a comprehensive way through the delivery of new housing, including specialist Extra Care housing for the elderly, alongside significant areas of green space, high quality landscaping and integrated infrastructure. This will provide the types of development clearly sought by **Policy HC1**.

To be fully responsive to the opportunities that development offers, **Policy HC1** should also refer to the need to deliver a full range of housing to meet local needs, including affordable and specialist housing for the elderly, as this is a critical factor in improving health outcomes for all.

Infrastructure

The current (paragraph 173) and dNPPF (paragraph 34) place a clear emphasis on ensuring local plan requirements have been fully viability tested to ensure that developments are not made undeliverable by the scale of obligations and policy burdens. The consultation on proposed changes to developer contributions and CIL includes removing the Regulation 123 requirements and introducing Infrastructure Funding Statements; together those changes will impact on how the Council plans for and monitors funding for infrastructure which should be reflected in **Policy I1**.

For **Policies I7** and **I8** to be effective the Council should undertake an assessment of open space and play pitch provision, robustly identifying areas with a surplus or shortfall of access to this infrastructure. This will provide a clear evidence base on which to plan for the delivery of new open space and play pitches, and to direct new provision to the most appropriate and accessible locations.

Transport

As set out above, the land at Riverview Park is situated east of Yokosuka Way. Early modelling of the impact of development as proposed at the site suggests that there is ample capacity for the dual carriageway to accommodate the scale of traffic anticipated from the development. This fits well with the Plan's aim to direct development to those locations where infrastructure can either be delivered to support development, or where existing infrastructure can be best utilised. The development proposals for the site also include setting aside land for the potential future delivery of a new rail station, linking the new neighbourhood to surrounding areas. This development would therefore well support **Policy T1** in ensuring "*development is located and designed to enable sustainable transport*" and to "*improve ... the walking and cycling network*".

In response to **Question T1** the proposed approach set out in the four development scenarios would not set out an appropriate strategic approach to transport planning in Medway, placing too much emphasis on the need for significant structural improvements and the failure to direct development to the most appropriate sustainable locations. A sound alternative approach would be to reconsider the development of Riverview Park, including this as a key allocation suitable to deliver significant development without the need for significant upgrades to the local transport infrastructure and with the potential for a new train station.

Policy T2 proposes a rigid approach to determining appropriate development densities in relation to accessibility to existing train stations. The dNPPF includes new text on achieving appropriate densities, setting out that local planning authorities should encourage more efficient use of land, taking into account:

- a) the identified need for housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive places.

There is a clear need for the Council to secure higher density development in areas already well connected to services and facilities, and with good infrastructure provision. The dNPPF encourages LPAs with an existing or anticipated shortage of land for meeting identified housing needs to optimise the use of land to meet as much of that need as possible. In response to **Question T4**, it is appropriate to follow the dNPPF proposals and to include minimum density standards for areas including Gillingham to achieve this, and for the optimum net residential densities set out in Table 11.1 to be reconsidered and increased in light of this national policy direction.

Further Comments

The development of my client's land at Riverview Park, east of Yokosuka Way, will achieve the Council's ambition to deliver benefits to improve Medway in a holistic manner. The mixed-use proposal for the site will deliver new housing for local people alongside high quality new office space to encourage business growth and reduce out-commuting, providing new job opportunities to complement the existing provision in neighbouring areas, and turn this underused land into an "*attractive modern place(s) to live, work and visit*".

The Thames Gateway Kent Plan for Growth (2014-2020) vision describes North Kent as a providing an exemplar of urban regeneration, with a thriving business centre attracting investors and businesses with strong, integrated communities sharing the benefits of development and investment. My client's aspiration mirrors this vision, seeking to deliver a new neighbourhood that people aspire to live, work and play. We support the Plan's inclusion of the site as an allocation, and will work together with the Council to deliver a high quality scheme that shows Medway at its best.

We have already sought to engage with the Council in pre-application discussions on the principle, scale and types of development envisaged at Riverview Park. In responding to this consultation it is hoped that the Council will reflect on the content of those discussions and how that development can be brought forward in partnership with my clients to deliver the benefits the local community needs.

We wish to be notified of each further consultation on the Plan. Please ensure my clients, **McCulloch Homes** and **Palm Developments**, are retained on the consultation database.

Yours faithfully

A large black rectangular box redacting the signature of the Principal Planner.

MEGHAN ROSSITER BSc (Hons.) MSc MRTPI
PRINCIPAL PLANNER
For and On Behalf Of
TETLOW KING PLANNING

A black rectangular box redacting contact information, likely a phone number or email address.

Planning Policy
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Date: 25 June 2018
Our ref: 13786/SSL/ZS/16015518v3

Dear Sir/Madam

Future Medway - Development Strategy Consultation: Church Commissioners for England Representations

This letter has been prepared by Lichfields on behalf of our client, the Church Commissioners for England.

The Church Commissioners for England (CCE) manage the historic property assets of the Church for England. Their Strategic Land Portfolio currently comprises circa 6,000 acres, with sites located nationwide. CCE seek to promote their landholding, where suitable, for development through the Local Plan process and work closely with LPA's to demonstrate site deliverability.

CCE have significant landholdings on the Hoo Peninsula including land to the east of Hoo St Werburgh, Kingsnorth and land at Stoke, Lower Stoke and Allhallows. They are, therefore, able to make land available to assist the Council in meeting the identified housing requirements for the area and in meeting the Council's vision and strategy. CCE also own land at Wainscott and it is considered that there could be some scope for housing at this location.

This letter comprises formal representations to the Local Plan Development Strategy (LPDS) Consultation (Regulation 18) document in respect of the emerging Medway Local Plan which is the third round of consultation undertaken to inform the Local Plan.

CCE welcomes the opportunity to be involved in the creation of policies that will form part of the emerging Local Plan. These representations provide comment in relation to a number of the questions posed within the consultation document. However, they are predominantly focused on policies relating to housing, employment and sustainable development.

In overall terms, CCE consider that the Plan, which will set land use policy up to 2035, needs to be ambitious, yet fully deliverable. It needs to ensure that the housing needs of the Borough can be met with clear guidance as to the most appropriate and sustainable sites to accommodate the required housing.

It will be noted that CCE are part of the Hoo St Werburgh Consortium. For the purpose of this Development Strategy Consultation, CCE are relying on the representations submitted by the Consortium which sets out the Consortium's shared vision for the expansion of Hoo St Werburgh and Chattenden into a sustainable rural town. These representations, prepared by Lichfields, address CCE's wider interest in Medway and their landholdings outside of the Consortium area.

Housing Requirement – Policies H1 and H2

CCE consider that the Council must accept the standard methodology for identifying the OAN, as made clear in the draft NPPF, and should seek to meet this requirement as far as possible.

Paragraph 61 of the draft NPPF is clear that the standard method should be used, unless there are 'exceptional circumstance' that justify an alternative approach. The LPDS appears to indicate that an alternative OAHN figure may be preferred going forward (the 2015 SHMA figure) but the consultation document fails to set out the necessary 'exceptional circumstances' required to justify an alternative approach. In the absence of a robust exceptional circumstances justification, the Local Plan may be found unsound.

CCE would support Policy H1, on the basis that the standard method is adopted as the starting point for any consideration of the housing requirement. The Plan will not be sound if it does not.

On housing mix, CCE have reservations regarding Policy H2 on the basis that it requires that the mix *"must be appropriate to the established character and density of the neighbourhood"*. This could be contrary to national guidance in the draft NPPF which seeks to increase densities over and above the existing. In paragraph 123 (a) of the draft NPPF it states that *"These standards should seek a significant uplift in the average density or residential development within these areas..."*.

CCE consider that it is important to review higher densities for new development adjacent to existing settlements and that this can often be acceptable, without causing harm.

This is made clear in Policy BE4, which summarises the position more clearly. However, CCE would request that Policy BE4 is changed with the word 'respects' replacing 'reflects', as the latter would imply that densities of new development should be the same as those in the existing context.

On affordable housing, CCE would note that the proposed level of viability in Policy H3 must be in line with a strategic viability assessment, as the NPPF notes that viability of development is key to delivery. Further, as each site is different, it is important to include in Policy H3 that the provision of affordable housing at less than that specified in the policy would be acceptable, subject to a viability appraisal, to demonstrate that it would be unviable to deliver more.

General – Approach to the Hoo Peninsula

CCE recognise that, in meeting the identified housing requirement, the Council should, in the first instance, look to bring forward urban sites and previously developed land. However, it is also noted that such sites are often costly to bring forward and can take time to become available to deliver the required housing. These considerations, coupled with the Borough's significant housing requirement will require the identification and release of less constrained greenfield sites.

To achieve its vision, CCE consider that the Local Plan needs to be ambitious, yet fully deliverable. It needs to ensure that the housing and employment needs of the Borough can be delivered with clear guidance as to the most appropriate and sustainable sites to accommodate the required housing and employment. In doing so, the Council will need to take a pragmatic approach to a range of development options.

In this regard, CCE fully support the proposals in the LPDS for significant growth at Hoo St Werburgh to establish a service centre for the Peninsula. The support for these proposals is clearly set out in the submission by Barton Willmore prepared for a consortium of landowners and developers, including CCE. As noted above, these representations will not repeat or seek to reiterate the commentary prepared by Barton Willmore on behalf of the Consortium in relation to the land at Hoo St Werburgh. However, CCE would like to confirm its support of further development expansion east of the Hoo St Werburgh development area,



towards the new railway infrastructure proposed by Medway Council. This is set out in Medway Council's Housing Infrastructure Fund (HIF) bid, which if successful, would see the re-introduction of a rail passenger service to the Hoo peninsula. CCE has extensive landholdings in this area and would welcome further discussions with Medway Council as and when the development strategy is confirmed.

As mentioned above, CCE also own land at Stoke, Lower Stoke and Allhallows, some of which has been identified in a number of the Council's Development Scenarios, and which CCE consider to be suitable for development. CCE are supportive of this land being identified in the Plan for housing in the medium to longer term.

In addition to the housing requirements, CCE also own land adjacent to the Kingsnorth employment area and consider that this land could be made available to provide further employment opportunities, as and when required. CCE are supportive of the proposals set out in Policy E1: Economic Growth which seeks to secure sustainable employment uses for strategic sites at Grain and Kingsnorth. The proposed masterplan included in Annex 1, identifies land that CCE consider to be suitable to facilitate and enhance the continued growth of Kingsnorth. This land is available now. CCE would welcome further discussions with Medway Council over the allocation of its land in this area for employment uses.

This representation therefore confirms that land within the Commissioners' ownership in these locations should be identified to assist in meeting the housing and employment requirements of the Borough. In this context, CCE have commissioned initial surveys to identify that development of the sites in question would not be constrained. They have also undertaken initial feasibility analysis to establish the likely capacity of such sites, if they were allocated in the Plan.

We set out these more detailed considerations below and CCE would welcome the opportunity to work with the Council and local communities to take these proposals forward.

Local Plan: Development Strategy – Policy DS2

We note and agree with the Council that whilst regeneration of brownfield sites is at the core of Medway's growth plans and the Council's vision, brownfield sites alone cannot deliver the scale and range of development needed. In this regard, the Council recognise that, realistically, there is a need to find greenfield sites to accommodate the levels of growth envisaged. The overall, sustainable and deliverable solution would, therefore, be to retain a core component of urban regeneration but to promote this as part of a wider, balanced development strategy that also involves the release of greenfield sites at strategic locations.

When releasing greenfield sites for development, the NPPF states at paragraph 84 that "*local planning authorities should take account of the need to promote sustainable patterns of development*". Release of greenfield land for development should therefore be the most sustainable and least constrained land that is well related to services and infrastructure.

Overall, CCE support Policy DS2 as this goes some way to meeting the full housing needs of the Borough and it is considered that this is the most sustainable way to achieve this. However, reference should also be made to the scope to consider land to the east of Wainscott as potentially meeting some of the required housing growth.

Development Capacity: Smaller Settlement Sites on Hoo Peninsula

In the context of the Local Plan Development Strategy, CCE has appointed a consultant team to undertake studies of the Hoo landholdings to ensure that the areas identified by the Council are sustainable options with no overriding physical constraints to delivery in the medium to longer term of the Plan period and beyond.

The main considerations have been transport, ecology, heritage and landscape in defining potential development areas and capacity, as set out below.

Transport Overview

CCE acknowledge that a fundamental consideration for development on the Hoo Peninsula is the capacity of infrastructure to support potential levels of growth and, in particular, the road network. It is recognised that there is a limited highways network on the Hoo Peninsula with most traffic passing along the A229, A289 and through the Four Elms Roundabout. A report prepared by Prime Transport Planning and submitted with the Hoo Consortium representations found that based on existing travel patterns (particularly those to work), the Hoo Peninsula has unique travel characteristics that differ from the rest of the country and the region. These characteristics are primarily as a result of the dispersed nature of the peninsula and its limited strategic transport connections. The report also considered that while there is scope to encourage the use of more sustainable modes of travel and reduce the need to travel through careful land-use planning, vehicular traffic will always be a heavily relied upon to reach other Medway towns and London.

It is noted that a high quality public transport provision will be required to support the emerging Local Plan growth and to provide sufficient capacity to meet the needs of a larger development on the Hoo Peninsula. In providing an enhanced public transport offer, it would give a realistic alternative to car based travel and open opportunities for rural residents. These will all be dependent on the scale of growth proposed to support, financially, such improvements.

Prime have identified a number of initial transport and highways improvements that could be introduced across the Peninsula. CCE are supportive of the recommended measures and would be keen to explore these and other suggestions with the Council in due course. CCE are aware that Medway are undertaking further assessments of the strategic transport networks and potential for upgrades are being tested and are prepared to engage in this process.

Site Description and Feasibility for Housing Sites

CCE appointed masterplanners to undertake initial feasibility studies for the smaller rural settlements. The initial findings demonstrate that, taking into account the sites and their individual opportunities and constraints, the following could be suitable for residential development at the following scales:

- 1 **Allhallows:** Proposed development could infill the greenfield land to the west of the existing settlement and would not lead to any coalescence between existing settlements. There are no overriding ecological, landscape, heritage or archaeological constraints. Access could be achieved from Avery Way. The Allhallows site is located on the far east of the peninsula with access provided from the A228 via two routes albeit one, Ratcliffe Highway, provides the more appropriate access route. Whilst the existing single carriageway arrangement will likely prove sufficient for connection to development in this location, it may be necessary to improve the alignment to provide a more direct connection.

This option would, therefore, represent a sustainable residential extension to the existing Allhallows settlement to support the existing primary school, local shops and doctor's surgery.

As the site is sustainable and accessible with no overriding constraints, we consider that there is scope for either small scale limited residential development or a more strategic scale to include mixed-use development and open space.

- 2 **Lower Stoke:** There is scope to provide new development to the west of the existing settlement, potentially either side of Cuckold Green Road. Access could be from Grain Road (A228) and All Hallows Road.

This offers the potential for a sustainable extension to the existing settlement which would help to support the local shops, school (is there more than one?) and services. Depending on the scale of development a new primary school could be provided, but this would be dependent on the wider strategy for the surrounding area on the Hoo Peninsula.

As the site is sustainable and accessible with no overriding constraints, we consider that there is scope for small scale residential development, with the potential scope for some mixed-use development, and open space.

Lower Stoke has the potential for further expansion in the longer term, with the residential area extending further west as a second phase on land safeguarded for development.

Development capacity: Employment Site at Kingsnorth

CCE and their consultant team have undertaken initial assessments and a land capacity study to identify the potential of the land within CCE ownership around Kingsnorth to deliver employment growth, in line with Policy E1 of the LPDS.

Initial feasibility work demonstrates that land to the west of the existing Kingsnorth employment area and south of the railway line would be suitable for expansion in the short term. The potential developable areas for employment growth at Kingsnorth are identified on the plan included in Annex 1, which shows 65.67 hectares or 162.03 acres of land delivering B1c, B2 and B8 uses. It is considered that this land could accommodate approximately 194,300 sqm/2 million sqft of employment generating floorspace split between the following uses B1c 12,400 sqm/133,472 sqft, B2 48,200 sqm/ 518,820 sqft and B8 133,700 sqm/ 1,439,135 sqft.

The sites identified on the plan include land that is identified as having the potential for mineral extraction as an extension to the Tarmac operations. It is considered that there would be the scope to develop this site for employment use following mineral extraction, assuming mineral extraction is viable.

Paragraph 5.18 of the draft Plan indicates that there could be employment land at the rural town at Hoo to 'complement' the existing employment provision at Kingsnorth. However, CCE consider the extension of employment land at Kingsnorth would support the sustainable offer of the rural town and would be better placed to provide the employment space required, in a more suitable location.

Development at Kingsnorth would also assist in providing a range of sites and options for delivering employment land and could assist in supporting local infrastructure. In this regard CCE are concerned that there is little analysis of the importance of Kingsnorth in paragraph 5.21.

Overall, for the reasons identified above, CCE support Policy E1 and propose that land at Kingsnorth is allocated for a range of employment uses.

Sustainability Appraisal

Arup has undertaken a Sustainability Appraisal (SA) of the emerging Local Plan, reviewing the development scenarios and emerging draft policies. CCE makes the following observations.

Section 5.1.6 outlines that land west of Lower Stoke and Middle Street Farm, Middle Stoke (amongst other sites) supports areas of open space that have potential to provide supporting habitat. It goes on to state that the exclusion of some of these site allocations from Scenarios 2 and 4 indicates that these scenarios are preferable when considering the implications of supporting habitat.

Both parcels of land have been identified as both available and suitable for development in the Council's latest SLAA (January 2017). CCE disagrees that the sites should be excluded from development scenario 4. A Preliminary Ecological Appraisal Assessment was undertaken by WYG in January 2017 to ascertain the



general ecological value of the land contained within site and to identify the main habitats and associated plant species. The report concluded the habitats on site are not considered to be of particular botanical importance and no evidence of protected or notable species was recorded during the site at the time of survey.

The sites are not considered to be of high intrinsic value from an ecology and nature conservation perspective and any future development proposals can include suitable open space provision and mitigation measures to ensure there are no adverse effects on any designated sites or protected species

Conclusions

In summary, CCE seek to encourage Medway to ensure that emerging policy creates a positive vision for the Borough, is consistent with the NPPF and allocates sustainable sites for housing, and employment in line with the established need that are sustainable and deliverable.

For this reason, CCE support the Local Plan strategy and consider that land at Hoo St Werburgh, Allhallows and Lower Stoke are suitable for providing new homes to meet the housing requirement, both in the short and longer term. This could be achieved by first (in the short to medium term) expanding Hoo St Werburgh as a rural town for the Peninsula and then, in the medium to longer term, growing the existing smaller settlements. This will help the Council to meet their housing requirement and ensure that development is focused in an accessible location that supports and enhance the local community and existing services. There is also scope for residential development at Wainscott.

CCE also supports the expansion of employment uses at Kingsnorth which could deliver much needed employment growth on the Peninsula and the creation of approximately 194,300 sqm/2 million sqft of employment generating floorspace.

We consider that the suggestions set out within these representations will assist in ensuring sustainable, viable and deliverable development within Medway to help meet the Council's vision.

Please contact us if you have any queries regarding these representations. Due to the complexities and potential of our client's sites, we would welcome the opportunity to meet with you to discuss CCE's landholdings and the emerging Plan further.

Yours faithfully



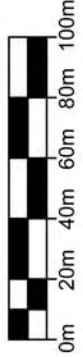
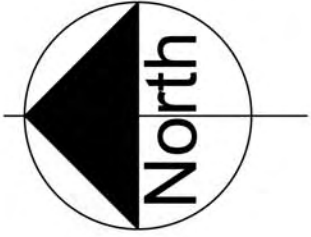
Zoe Simmonds
Senior Planner

Copy Joanne Loxton (The Church Commissioners for England)



Annex 1: Kingsnorth Proposed Masterplan

NOTES:
Copyright Cheewoods (London) Limited. No implied license exists.
Contractors must verify all dimensions on site before commencing any work or
stop drawings. The drawing is not to be scaled. Use figured dimensions only.
All dimensions are to the centre of the road or the centre of the design process
due to the ongoing construction of the site.
Please note the information contained within this drawing is solely for the
design of the project and is not to be used for any other purpose.
The design of this project will be based on the "Cheewoods - Hazard Analysis and
Management" report. The design of the project will be based on the "Cheewoods -
comprehensive set of hazard management procedures are available from the
Principal Designer appointed for the project.



KEY

B1c/B8 Employment

B2 Employment

APPROX. SITE AREA: 65.67 Ha / 162.30 Acres
Southern land parcel - potential for minerals
extraction prior to surface redevelopment.

P6	Note added.	22/06/18	SHNH
P5	Future Phase 3 layout amended.	22/06/18	SHNH
P4	Key colours amended.	19/06/18	SHNH
P3	Key updated.	18/06/18	SHNH
P2	Rev updated.	18/06/18	SHNH
P1	First Issue.	12/06/18	SHNH

PRELIMINARY

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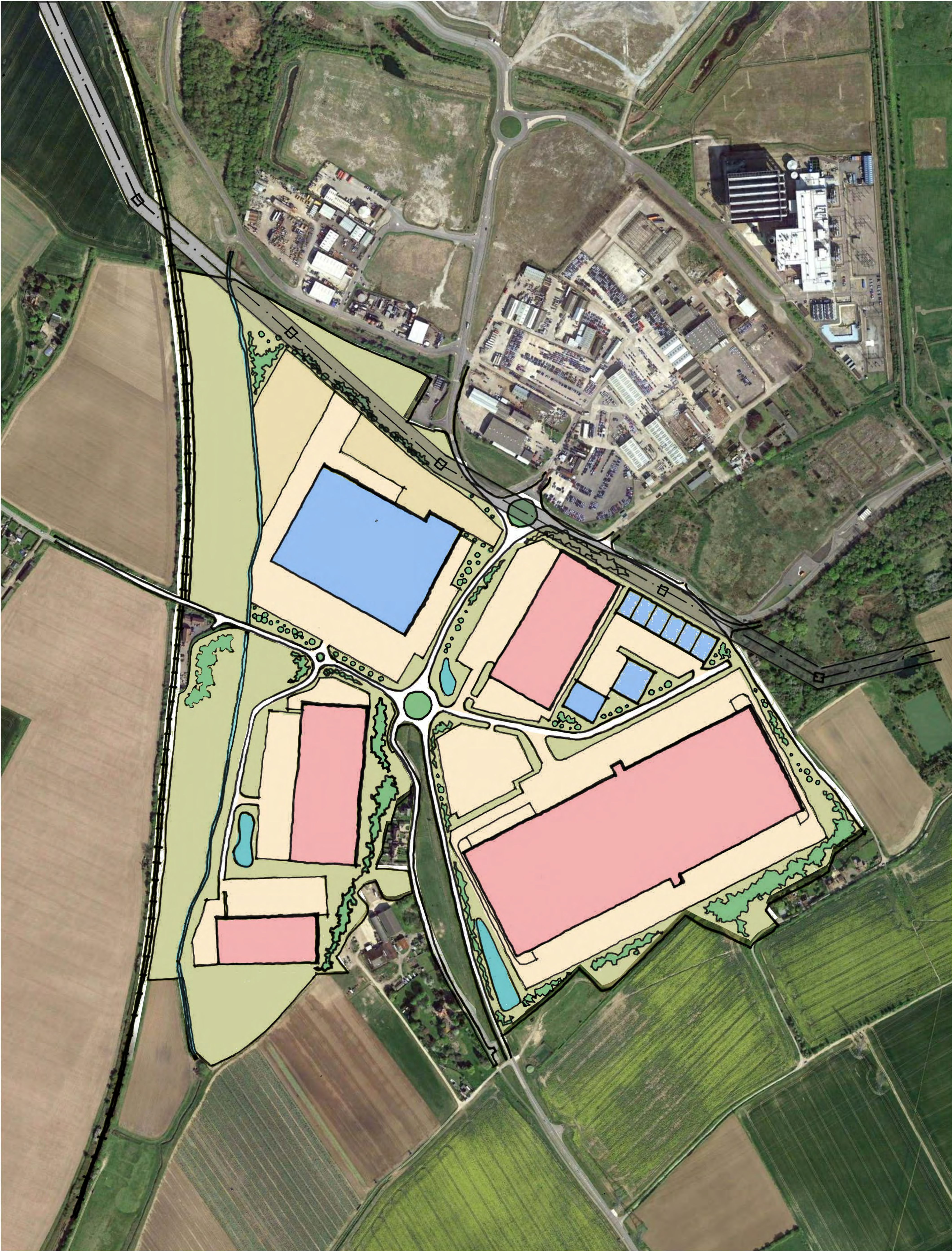


Project
KINGSNORTH MASTERPLAN

Client
CHURCH COMMISSIONERS FOR ENGLAND

Drawing Title
PROPOSED MASTERPLAN

Scale	Size	Drawn	Checked	Date			
1:2500	A1	SH	NH	12/06/2018			
Project	Originator	Zone	Level	Type	Rate	Number	Rev
4493	CA	00	00	DR	A	00051	P6



maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 11:01
To: futuremedway
Subject: Fwd: Future development strategy T4 Rochester Airport

Categories: Blue Category

>
> I wish to raise my objections regarding the proposed alteration/ development of our local Rochester Airport.
>
> Why are you proposing to close one of the two current runways, this will expose more local residents to greater dangers from potential air accidents, whilst you claim to have the interests of these same residents protecting them from noise, pollution, and traffic, if you wish to continue with our airport you must retain both runways.
>
> I also fear there is an attempt to bypass any inquiry into a full public report on the impact of safety, noise, as well as any impact on the environment which you claim to have concerns about, why would you do this, to the very people you claim to represent, surely the sum of £4.4 million could be used for a greater good than this folly, please show. Some greater imagination for the majority of residents not the few, at the same time giving them a healthier life.
>
> Hugh Panting
[REDACTED]
>
>
>
>
>
>
>



Unit 2 | Alexandria Way | Congleton | Cheshire | CW12 1LB
www.kodiakland.co.uk



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

By email to: futuremedway@medway.gov.uk

25 June 2018

Dear Sir/Madam

These representations are submitted by Kodiak Land (from here on referred to as Kodiak) in response to the current consultation on the Local Plan Development Strategy Consultation Document. Kodiak welcomes the opportunity to comment on this version of the Medway Local Plan, and asks to be kept informed on progress with this document.

Kodiak specialises in the promotion of small sites (typically 5-7 acres) for residential development, by working alongside the local community to deliver bespoke, high quality, design-led schemes which meet local housing needs and deliver community benefits while also assisting Councils to meet their five year housing land supply requirement.

I enclose a site submission for Land south of Lower Rainham Road, Lower Rainham which Kodiak consider to be suitable, achievable and deliverable within 5 years in line with the guidance in the Framework (para. 47) and in accordance with the findings of the Council's February 2017 SLAA. Kodiak is pleased that in light of our previous representations and discussions with development management officers, the site has been recommended for allocation in three out of the four spatial options for growth identified in the development strategy. We consider that the allocation of this site should be carried forward into the plan to be submitted for examination, whichever of the four scenarios is taken forward.

Policy

The current Development Strategy consultation proposes 4 key scenarios to help accommodate the challenging housing needs of Medway:

- Scenario 1- Meeting Assessed Need
- Scenario 2- Investment in Infrastructure
- Scenario 3- Meeting Local Housing Need
- Scenario 4- Development of Lodge Hill SSSI

The site which Kodiak is promoting at Lower Rainham Road is included as a potential allocation under scenarios 1, 3 and 4. Under scenario 2, it is stated that provision of additional infrastructure to serve the Hoo Peninsula would allow additional capacity to be unlocked at the strategic sites on the peninsula, thus obviating the requirement for additional housing north of Rainham. However, it is clear that notwithstanding any uncertainty attached to the provision of such infrastructure, there will be a requirement for smaller sites which can deliver new housing in the short term as part of any of the scenarios put forward, to ensure that a five year supply can be demonstrated upon adoption of the plan alongside meeting needs later in the plan period. It is also considered that growth should be distributed across the borough's settlements, and as will be emphasised in the enclosed site submission it is clear that Rainham (and Lower Rainham) is a sustainable settlement which is relatively free of constraint and capable of accommodating considerable additional housing growth in this plan period. Kodiak submits that the Lower Rainham Road site is deliverable, developable and achievable within five years under any of the scenarios outlined.

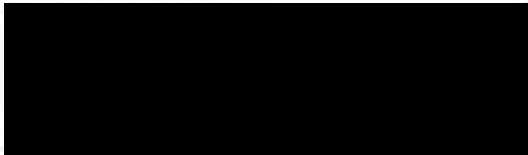
It is noted that the proposed allocation includes land to the east of that under our client's control. While Kodiak recognises the benefits of delivering the two sites in a coherent manner, we do not consider that either of the sites relies on the other in order to be delivered. The site being promoted by Kodiak can be delivered, in a sustainable manner, on its own. As such, we would suggest that the Council includes the two sites as separate allocations in the publication version of the plan. Any additional masterplanning requirements between the two sites could be achieved through the development management process, if considered by the Council to be necessary.

The benefit of the site put forward by Kodiak is that it is sustainable, outside of the Green Belt and can provide a site attractive to a small and medium size housebuilders and which can be brought forward quickly, to help meet both the overall plan target for housing and the 5 year land supply.

Conclusion

Kodiak can confirm that enclosed the site is available, offers a suitable location for development now and is achievable with a realistic prospect that the housing will be delivered within five years. We therefore consider that the site should be allocated within the Local Plan, and look forward to taking part in future consultation exercises on the plan.

Yours faithfully



Christien Lee
Planning Manager
Kodiak Land



KODIAK LAND

MEDWAY COUNCIL LOCAL PLAN 2012-2035

Site Submission to the Development Strategy

Regulation 18 consultation report

June 2018

1 LAND SOUTH OF LOWER RAINHAM ROAD, RAINHAM

1.1 Introduction

- 1.1.1 Kodiak is promoting a site at Land south of Lower Rainham Road, Rainham for proposed residential development (see location plan below).



1.2 Context

- 1.2.1 The c.3.2ha site is located to the north of Rainham, and comprises numerous small agricultural fields with boundaries formed chiefly of hedgerows and mature trees. To the north of the site beyond the B2004 Lower Rainham Road lies open countryside, to the west of the site is a small allotment and wooded area forming part of the Berengrave Nature Reserve. Existing residential development abuts the site to the south, and to the east is a mixture of existing residential development and scrubland. Residential development of the site would be in keeping with existing abutting land uses and a logical infill of development.
- 1.2.2 The site lies adjacent to Rainham which is a sustainable settlement with a wide range of services and facilities. Within 2km of the site there is a primary school, convenience store, shops, public houses, railway station, and a public park. All of these facilities are easily accessible from the development site via safe walking routes along footpaths adjoining well-lit highways or by the use of frequent public transport services.

1.2.3 The site lies within 400m of a bus route with up to 5 services per day to Sittingbourne and 6 services per day to Chatham (Monday-Friday) which provide for a range of higher order services. A short distance from the site is Rainham railway station which is served by up to 5 services per hour to London (St Pancras or Victoria) with journey times inside one hour. Services also run to Stratford International, Ramsgate, Faversham, Canterbury and Dover.

1.2.4 Rainham is capable of hosting additional residential growth which will help to sustain and enhance the existing services and facilities in the town. The site is located in a sustainable location within Rainham; indeed, an appeal decision on a nearby site at Station Road, Rainham (APP/A2280/W/15/3002877, December 2015) confirmed that *“the site is well located in terms of shops, services and transport links”*.

1.3 SLAA

1.3.1 The February 2017 SLAA document identifies the promotion site as part of a wider site “00849” which is assessed as suitable and available for development within 5 years. Kodiak supports this assessment and thinks development of the site can contribute to the Council achieving a 5 year housing land supply.

1.4 Local Plan Development Options

1.4.1 The Local Plan Development Strategy document outlines a number of broad strategic options for the location of the substantial quantum of new housing which is required between 2012 and 2035. Kodiak considers that the development of the site at Lower Rainham Road would be consistent with all of the development options identified, as it is recognised that the district’s constraints mean that new housing will need to be delivered from a range of sources.

1.5 Conclusion

1.5.1 Kodiak can confirm that the site is available, offers a suitable location for development now and is achievable with a realistic prospect that the housing will be delivered within five years. We therefore contend that the site should be allocated within the Local Plan.

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 11:04
To: futuremedway
Subject: Medway Council's local plan

Categories: Blue Category

Hi,

Being residents of Hoo we totally disagree with the plan to turn this rural area full off farmland and wildlife into another town. Over recent years farmland and orchards have been built on all over this area, and is continuing with the latest Bellway development at the top of Bells Lane and the Abbey homes estate at Chattenden.

None of this has seen any meaningful improvement to the roads on the peninsular, extra pressures have been put onto doctors surgeries and they are unable to recruit new doctors adding to the problem.

Most of the land already built on was farmland and every time we lose this we lose the wildlife that goes with it. The SSSI area at Lodge Hill should be protected as its what it says, an SSSI.

It is not Medways housing needs as a large percentage of people come down from London and its surrounding area as properties are cheaper.

Regards
Norman & Sandra Hogben

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 11:07
To: futuremedway
Cc: [REDACTED]
Subject: Local Plan

Categories: Blue Category

Sirs
Of course additional housing is needed in Medway, but why does it have to be on greenfield sites when there are empty, non-productive brownfield sites around the area. To continue building homes in areas, such as Hoo, where the infrastructure is already under considerable pressure, makes no sense at all. The only ones to gain are those who have land to sell to greedy developers and can then move out of the area if they so choose. These developers seem to do nothing to improve the infrastructure. I doubt they even care what trouble they may cause in the pursuit of profit. As further homes are built so, for example, our waiting time to see a GP seems to increase. Where are the children in these developments to be schooled? Many are already bussed into Strood and beyond.

Please think more about enhancing the area rather than concreting over the surrounding countryside.

Yours faithfully

Malcolm Turner (Rev)

[REDACTED]

MEDWAY COUNCIL LOCAL PLAN
2012 - 2035
REGULATION 18 CONSULTATION

Response to Public Consultation

On behalf of
Taylor Wimpey UK Ltd
and
Persimmon Homes

June 2018

**MEDWAY COUNCIL LOCAL PLAN
2012 – 2035
REGULATION 18 CONSULTATION**

RESPONSE TO PUBLIC CONSULTATION

**ON BEHALF OF
TAYLOR WIMPEY UK LTD
AND
PERSIMMON HOMES**

JUNE 2018

Project Ref:	22372/A5
Status:	Final
Issue/Rev:	01
Date:	22 June 2018
Prepared by:	Tom Ashley
Checked by:	David Bradley
Authorised by:	David Bradley

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Ref: 22372/A5/TA/kf/cg
Date: 22 June 2018

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APPENDICES

Appendix A: Site Location Plan (M01)

1.0 INTRODUCTION

i) Purpose of these Representations

- 1.1 These representations are submitted on behalf of Taylor Wimpey UK Ltd and Persimmon Homes in response to Medway Council's (MC) Local Plan 2012-2035 Development Strategy (Regulation 18) consultation (LPDS, March 2018). Taylor Wimpey and Persimmon Homes, both large National housebuilders, own equally the Site known as 'Land at Mill Hill, Gillingham' (hereafter referred to as 'the Site'). A Site Location Plan is included at **Appendix A**.
- 1.2 The Site comprises two land parcels located to the east of A289 Yokosuka Way and to the east of Gillingham. In total, the parcels comprise 3.78 hectares. Further detail on the Site is provided in Section 2.0 of these representations.
- 1.3 Notwithstanding our Clients specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework (NPPF) (March 2012) and National Planning Practice Guidance (PPG) (March 2014).
- 1.4 On 5 March 2018 the Government published the 'Draft Revised NPPF' for public consultation. Whilst the revised NPPF is still in draft, it is anticipated¹ that the Medway Local Plan will be examined against the policy requirements of the new NPPF. It is thereby essential that MC has regard to the emerging NPPF policy requirements as it prepares the Regulation 19 Draft Plan. The representation has also been prepared with reference to these emerging policy requirements. The relevant emerging policy requirements are considered in detail at Section 3.

ii) Purpose of the LPDS

- 1.5 MC previously consulted on its Local Plan Issues and Options (LPIO) document between January and February 2016 (under Regulation 18). The LPIO consultation did not set out detailed policies or identify specific development sites, rather it sought representations on key contextual matters and potential approaches that could be taken forward in the new Local Plan strategy.

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

- 1.6 MC subsequently consulted (under Regulation 18) on its Local Plan Development Options (LPDO), setting out a draft vision and strategic objectives for the area and four potential development options available to meet Medway's identified needs over the Plan period (2012-2035).
- 1.7 The current LPDS consultation (under Regulation 18) progresses forward from the LPDO, setting out a draft spatial development strategy (Policy DS2) which comprises a focus upon regeneration of brownfield land and the creation of a new 'Rural Town' on the Hoo Peninsula. Whilst the LPDS clearly sets out a draft spatial development strategy, it also seeks view on four variations of the strategy ('Scenarios'):
- Scenario 1 – Meeting Objectively Assessed Need;
 - Scenario 2 – Investment in Infrastructure to unlock growth;
 - Scenario 3 – Meeting Government's proposed calculation of Local Housing Need;
 - Scenario 4 – Consideration of development within Lodge Hill SSSI.
- 1.8 'Site allocations' maps have been prepared in support of each of the development scenarios. It is noted that Land at Mill Hill is not identified on any of the site allocations maps.
- 1.9 The LPDS also identifies some draft policy approaches, on which views are sought. In addition, an interim Sustainability Appraisal has been published in support of the LPDS consultation.

iii) Strategic Land Availability Assessment

- 1.10 It is noted that an updated Strategic Land Availability Assessment (SLAA) has not been published in support of the LPDS. Given that the SLAA comprises a key part of the Local Plan evidence base, its absence undermines the robustness of the LPDS consultation. Particular issues arising from the absence of the SLAA are discussed throughout these representations.
- 1.11 My clients thereby reserve the right to comment of the updated SLAA as and when it is published, and any implications it might have for the Development Strategy.

iv) Content of Representations

- 1.12 In summary, these representations set out the following comments:
- We consider that the LPDS fails to properly address the implications of the emerging standard method housing requirement for Medway. More land will need to be identified and allocated to meet the standard method requirement; there is no evidence that 'constraints' will prevent the standard method requirement being achieved.

- We consider that the absence of key pieces of evidence, the SLAA and IDP, undermine the robustness of the LPDS. In the absence of these documents it is very difficult to consider the robustness of the draft development strategy.
- We consider that the spatial development strategy is heavily dependent upon the rural town and as such there is significant risk to the housing trajectory and housing land supply.
- We consider that, in evolving the spatial development strategy, only limited thought has been given to the need to direct more growth to suburban areas. It is considered essential for the soundness of the Plan that more growth is directed towards the suburban areas to reduce reliance on the rural town and help achieve the standard method housing requirement.
- We consider that the Site is assessed to be suitable for development, given the absence of overriding constraints, and would deliver sustainable development, located adjacent to the existing urban edge. It would also support the ongoing regeneration of Medway, by delivering growth and contributing to the viability of Gillingham.
- The Site is currently available for development, equally owned by Taylor Wimpey and Persimmon Homes both being large National house builders, and has a realistic prospect of housing being delivered within 5 years to meet short term development needs.
- We consider that our Site can be brought forward entirely in accordance with the broad aspirations of the Council's spatial development strategy, in particular the key principle of supporting urban regeneration.

2.0 LAND AT MILL HILL, GILLINGHAM

i) The Site and its Surroundings

- 2.1 The Site comprises two land parcels located in North Rainham to the east of A289 Yokosuka Way that forms the current eastern extent of Gillingham. In total, the parcels comprise 3.78 hectares (9.34 acres).
- 2.2 Immediately to the west of A289 Yokosuka Way lies Grange Farm, which is a relatively recent residential development built by Taylor Wimpey. To the south of the Site is Invicta Business Centre, the northern boundary of which is the North Kent (Canterbury to London) railway line.
- 2.3 Parcel A as shown on the Site Location Plan (**Appendix A**) comprises an almost triangular piece of land immediately to the south of B2004 Lower Rainham Road and to the east of A289 Yokosuka Way. The land parcel is currently in agricultural use with a number of farm buildings in the southern part of the site.
- 2.4 Land Parcel B lies to the south of Land Parcel A and also comprises an almost triangular piece of land also in agricultural use and adjacent to A289 Yokosuka Way. Mature planting forms the boundary between the Site and Yokosuka Way.
- 2.5 Parcels A and B are separated by Grange Road which terminates close to the boundary with A289 Yokosuka Way.

ii) Proposed Development

- 2.6 The Site is being promoted for residential use comprising a mix of dwelling types and sizes, including an element of affordable housing. It is anticipated that approximately 100 dwellings could be delivered on the Site.

iii) Strategic Land Availability Assessment

- 2.7 As noted above the an updated SLAA has not been published in support of the LPDS. The SLAA was last fully updated in November 2015. Whilst a further SLAA report was published in January 2017 this did not include site proforma and as such could not be properly reviewed and considered.

- 2.8 It is considered that the SLAA evidence base is out-of-date, as the underlying assessments have not had regard to the emerging standard method housing requirement. Thereby the assessments have not properly considered the amount of land that needs to be released when judging suitability of land for development.
- 2.9 The 'out-of-date' November 2015 SLAA concluded that the Site is unsuitable for housing development due to the Site's location on the best and most versatile agricultural land and its inclusion in the Area of Local Landscape Value (ALLI) (Lower Rainham Farmland), which is considered sensitive to change and thereby development on the Site is "likely" to have a detrimental impact upon such a designation. Given that these judgements were reached without proper regard to the amount of land that needs to be released in Medway, they cannot be relied upon.
- 2.10 With regard to the other suitability considerations Site was assessed as follows:
- Good access to public transport opportunities;
 - Likely that a suitable vehicular access could be created on to Featherby Road, Grange Road or Lower Rainham Road, directly adjacent to the Site;
 - Development is unlikely to have an impact upon any designated heritage assets;
 - Mitigation likely to be deliverable to overcome any air pollution constraints;
 - Contamination is possible due to past uses, but mitigation is capable if found;
 - Site is not designated open space or employment land; and
 - Level of flood risk on site is considered acceptable.
- 2.11 It will be necessary for the above analysis to be reviewed in support of the Regulation 19. To inform the updating of the SLAA, we provide the following comments in respect of the Suitability, Availability and Achievability.
- 2.12 **Suitability** - Drawing upon the Council's own SLAA methodology, the following demonstrates that the suitability of the Site for development:
- Designations - The Site is not subject to any International or National ecology or landscape designations. Whilst the Site is located close to the Medway Estuary and Marshes Special Protection Area, it is considered that any recreational impacts arising from the development can be easily managed via the Strategic Access Management and Monitoring (SAMM) measures that are being put in place by Medway Council.

- Accessibility – The Site it is directly adjacent to Gillingham and is thereby has good accessibility to services and facilities. Notably the site is situated in close to proximity to: Twydall Local Centre (1.3km); existing employment site (approximately 650m south); schools (the Academy of Woodlands approximately 1km south); strategic public open space (Riverside Country Park approximately 1km east). Transport - The Site has good access to public transport with buses running along the A289 and Gillingham Railway Station approximately 2.0km to the west of the Site. The Site is well connected to the existing local road network (A289) and near the strategic highway network.
- Landscape – The Site is located next to the existing urban area and adjacent to main roadways (A289 Yokosuka Way and B2004 Lower Rainham Road) and is subject to a number of existing urban influences, which impact upon its landscape value and quality. To this end the Site comprises relatively low quality, fragmented, urban fringe landscape with a high capacity to absorb development and a low sensitivity to change.
- Flood risk – Whilst part of the site is subject to a high level of flood risk but it is expected that this could be resolved and that the site would pass the sequential test for flood risk.
- Heritage – The Site does not include any heritage assets and there are none in close proximity.
- Air Quality – The Site is not within or adjacent to an Air Quality Management Area.
- Contamination – The Site is not known or suspected of contamination.
- Agricultural Land – As with almost all of the greenfield sites in Medway, the Site comprises agricultural land, and thereby the loss of this agricultural land can be accommodated without a significant impact.

2.13 **Availability** - The Site is wholly in the ownership of my Clients and available for development immediately.

2.14 **Achievable** - Given that it is in the ownership of two national housebuilders, is broadly free of constraints and comprises a relatively small scale urban extension, the Site is achievable at the early part of the plan period (post adoption).

- 2.15 In summary, the Site is suitable for development, achievable and available and is thereby an entirely appropriate location for development subject to compliance with an appropriate spatial development strategy for the plan period.
- 2.16 The remainder of these representations thereby deal with the draft spatial development strategy, explaining how the Site can and should be allocated to enhance the development strategy and the soundness of the Local Plan.

3.0 EMERGING NATIONAL PLANNING POLICY

- 3.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.
- 3.2 On 5 March 2018 the Government published the 'Draft Revised NPPF' for public consultation. The consultation closed on 10 May 2018. Whilst the revised NPPF is still in draft, it is anticipated² that the Medway Local Plan will be examined against the policy requirements of the new NPPF. It is thereby essential that MC has regard to the emerging NPPF policy requirements as it prepares the Regulation 19 Draft Plan.
- 3.3 To this end the following seeks to highlight the key policies of the Draft NPPF, focusing on new or amended policy requirements which the Consortium suggests the Council should pay particular attention as it prepares the Regulation 19 Draft Plan in the coming months, namely:
- Section 2 – Achieving Sustainable Development;
 - Section 3 – Plan Making; and
 - Section 5 – Delivering a sufficient supply of homes.

i) Achieving Sustainable Development

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

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

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

² Para. 209 of the Draft NPPF states that "*policies in the previous framework will apply for the purposes of examining plans, where those plans are submitted on or before [six months after the date of publication]*". The Government has indicated that it is aiming to publish the Final Revised NPPF in Summer 2018. Thereby this is very likely to be fully in force for the anticipated submission of the Medway Local Plan in March 2019.

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

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

3.7 The 'presumption in favour of sustainable development' is set out at Para. 11. For plan making this means:

- "a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;**
- b) strategic plans should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas, unless:**
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or**
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."**

ii) Plan Making

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

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

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

- 3.10 With regard to co-operation across administrative boundaries Para. 29 places greater emphasis on the need for 'Statements of Common Ground':

"In order to demonstrate effective and on-going joint working, strategic plan-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency."

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

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

- 3.12 Para. 35 places greater emphasis on sustainability appraisals informing the preparation of Plans. This paragraph links sustainability appraisals back to the Para. 8 sustainability objectives, and the Para. 9 requirements to seek 'opportunities for net gains' across all three objectives.

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

- a) **"Positively prepared – provides a strategy which will, as a minimum, meet as much as possible of the area's objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;**
- b) **Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;**
- c) **Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and**
- d) **Consistent with national policy – enables the delivery of sustainable development in accordance with the policies in this Framework."**

iii) Delivering a Sufficient Supply of Homes

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

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

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

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

3.17 Para. 73 emphasises the Government's support for large scale development as an approach to supplying a large number of homes:

"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Working with the support of their communities, and other authorities if appropriate, strategic plan-making authorities should identify suitable opportunities for such development where this can help to meet identified needs in a sustainable way. In doing so, they should consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains. They should also consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size".

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

- "a) 5% to ensure choice and competition in the market for land;**
- or**
- b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year;**
- or**

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

iv) Summary

- 3.19 The emerging revised NPPF is likely to introduce some policy changes which will have significant implications for the ongoing preparation of the Medway Local Plan.
- 3.20 Most notably the revised NPPF will introduce a requirement for use of the standard method for calculating Objectively Assessed Housing Need; as is discussed in Section 4, it is essential to the soundness of the Plan that this requirement is acknowledged and properly dealt with.
- 3.21 Additionally, there is greater emphasis on developer contribution being dealt with through the Plan making process, placing increased importance on ensuring a robust, properly costed, Infrastructure Delivery Plan forms a key part of the evidence base.
- 3.22 Notwithstanding these important changes, the focus of Plan Making continues to be achieving sustainable development (albeit with a more explicit link between the Sustainability Appraisal and soundness). To this end the Para. 11b test must be the paramount consideration in assessing the extent to which Objectively Assessed Needs can be accommodated.

4.0 OBJECTIVELY ASSESSED NEED

- 4.1 As highlighted in the policy context section above, the Government is in the process of introducing the 'standard method' calculation for housing need.
- 4.2 It is noted that LPDS Paragraph 3.7 specifically acknowledges the emerging standard method and the implications for Medway, namely an annual housing target of 1665 dwellings per annum (37,143 over the Plan period). Paragraph 3.10 states:

"Therefore in preparing for this stage of consultation on Medway's new Local Plan, the council has explicitly considered how it could meet the higher level of housing needs over the plan period, consistent with the strategic objectives of the plan, and requirements of sustainable development".

- 4.3 However, it is noted that only one of the four scenarios even seek to reach the standard method requirement, and even then, falls short. Instead the LPDS makes reference to the 2015 Strategic Housing Market Assessment figure of 1281 dwellings per annum (29,463 dwellings over the Plan period) in three of the scenarios, despite the very high probability that this figure will shortly be defunct.
- 4.4 The difference between the standard method and the 2015 SHMA requirement is significant at 384 dwellings per annum (7,680 dwellings over the plan period). Given that the Regulation 19 draft is due to be published at the end of 2018, we are disappointed that MC have not taken the opportunity presented by the LPDS consultation to properly consider, in a meaningful way, how the standard method requirement can be accommodated.
- 4.5 Thereby, we consider that MC must fully accept the standard method figure as a starting point and should seek to meet this requirement as far as possible, as is consistent with achieving sustainable development. MC should not calculate, and seek to justify, an alternative OAHN. The reasons for this are set out below.
- 4.6 Paragraph 61 of the draft NPPF is clear that the standard method should be used unless there are 'exceptional circumstance' that justify an alternative approach. Whilst these 'exceptional circumstances' are not defined in the draft NPPF, with its echoes of well-established Green Belt policy, it is clear that this is a very high bar.
- 4.7 Whilst the LPDS appears to indicate that an alternative OAHN figure may be preferred going forward (namely the 2015 SHMA figure), the consultation document fails to set out the necessary 'exceptional circumstances' which would be required to justify the alternative approach. The Consortium considers that in the absence of a robust exceptional circumstances justification, the Local Plan runs a very high risk of being found unsound.

4.8 It is however noted that the consultation document states at paragraph 3.9 that:

"It is recognised that areas may have important constraints, such as environmental designations, Green Belt, or physical constraints that restrict the ability to meet the needs in full. If this is robustly and soundly assessed, the plan may promote a housing target lower than the Local Housing Need figure. However, the council will be required to explore other options for meeting its area's housing needs, such as providing more land in a neighbouring borough."

4.9 We strongly advise that this does not comprise an exceptional circumstances justification for alternative OAHN methodology. Rather this is an explanation for why the OAHN cannot be met. This thereby relates to the Local Plan 'strategy' and the tests of Soundness (Para. 36) and the Presumption in Favour of Sustainable Development (Para. 11), rather than OAHN methodology.

4.10 We advise that the Council must accept the standard method figure and work back from this to assess if this can be accommodated in accordance with the Presumption (Para. 11b). Whilst there may be evidence that the full standard method OAHN cannot be accommodated without the *"adverse impacts of doing so significantly and demonstrably outweighing the benefits"*, this must be clearly set out through the SLAA and Sustainability Appraisal. There is a very clear absence of any such evidence at this stage.

4.11 In summary, it would be inappropriate for the Council to seek to use an alternative approach to calculating OAHN, because of an assumption that the Borough is constrained. Further we warn against seeking to justify an alternative methodology with reference to past delivery rates – this is not a demographic issue and would fail to have regard to the Government's very clear objective of significantly boosting the supply of housing (Para. 60).

5.0 DEVELOPMENT STRATEGY

- 5.1 Notwithstanding our concerns that the emerging Plan is gravely flawed in respect of the approach to OAHN, the following sets out my client's views in respect of the two key components of the proposed spatial strategy (Policy DS2) namely: the focus upon regeneration of brownfield land; and the creation of a new 'Rural Town' on the Hoo Peninsula.
- 5.2 It is noted that that the LPDS acknowledges that not all the housing growth required in the Plan period can be accommodated on brownfield land and at the rural town. The LPDS thereby explains that some growth will need to be directed towards 'other locations' in the Borough. These 'other locations' comprises a key part of the variation between the different development scenarios. The other locations are considered further in the Section 6.

i) **Brownfield Land**

- 5.3 It is noted that focusing growth towards brownfield land is entirely in accordance with emerging national policy, which is introducing a renewed emphasis on the use of previously developed land. It is thereby acknowledged that seeking to make the best use of previously developed land must be a key part of the Local Plan strategy. However, whilst the broad principle is robust, we consider that further evidence and detail is required to ensure the robustness of this part of the strategy and the soundness of the Plan.

Development Potential Assumptions

- 5.4 Firstly, assumptions concerning the capacity and deliverability of brownfield sites must be robust. It is noted that the LPDS does not provide any detail concerning the assumed capacity of brownfield sites. It is assumed that this information will be included in the updated SLAA when published. We look forward to reviewing this information as the plan making processes moves forward and we reserve the right to comment on the robustness of these assumptions when this information is made available.
- 5.5 Notwithstanding the absence of this information we note that assumptions made concerning the capacity of brownfield sites refers to the amenity and environmentally constraints of a particular site. Whilst it is acknowledged that site capacity can only be fully considered through the development management process, assumptions made at the Local Plan production stage must be robust and evidenced based. It would be entirely inappropriate to assume higher densities can be achieved without a policy justification.

Highway Network Capacity

- 5.6 Secondly, it is understood that the highway network around town centres is particularly constrained. Whilst it is acknowledged that this should not be a barrier to growth and regeneration, it will be important that a comprehensive sustainable transport strategy, encouraging modal shift, is put in place as part of the plan making process to ensure that the redevelopment of brownfield sites can be delivered without causing significant detrimental impacts to the highway network.
- 5.7 If a Sustainable Transport Strategy is not in place, assumptions concerning the deliverability of brownfield land will be unjustified and unsound.

ii) Rural Town

- 5.8 The LPDS highlights that the land around Hoo St Werburgh has considerable potential to accommodate significant growth, delivering major infrastructure enhancement alongside housing and supporting services and facilities.
- 5.9 Given the scale of growth that must be accommodated in Medway, it is recognised that some strategic growth must be directed towards the Hoo Peninsula. It is also acknowledged that there is a rationale for directing a sufficient quantum of growth to a single location, with a view to securing large scale new infrastructure.
- 5.10 However, whilst my Client's recognise logic of making the Hoo Peninsula Rural Town a key component of the development strategy, this is subject to several substantive caveats and concerns which must be addressed if the Plan is to be found sound at examination.

Infrastructure Delivery

- 5.11 It is acknowledged in the LPDS that the rural town will require significant new infrastructure including transport, schools, social and community facilities and open space. As noted above the delivery of this new infrastructure is one of the major justifications for the rural town as a key component of the strategy.
- 5.12 However, at this stage the details of the infrastructure delivery programme and mechanisms are limited. As the Plan moves forward towards Regulation 19 it will be essential that the Infrastructure Delivery Plan (IDP) is worked up. In the absence of robust (and costed) IDP the Inspector will have no certainty that the rural town is deliverable. This is all the more important with the draft NPPF 2 focus on assessing viability at the plan making stage.

- 5.13 Given that the LPDS comprises the third Regulation 18 consultation, we would expect the production of the IDP to be far more advanced. It is assumed that this work is emerging. However, my client's reserve the right to object to the rural town as a key component of the strategy, should the IDP be insufficiently progressed at Regulation 19 stage.

Housing Trajectory

- 5.14 We further note that, in the absence of a robust IDP, it is unclear how quickly the rural town can begin delivering and at what rate it will be able to subsequently be built out. It is unclear how the phasing of infrastructure will relate to the delivery of units. It is also unclear how much new residential development the market can absorb in a single location.
- 5.15 Whilst these issues can, to some extent, be addressed by a robust IDP, it must also be acknowledged that, even with a robust IDP in place, placing a significant reliance upon a single large-scale development, introduces a major risk in terms of housing delivery. Should issues emerge, perhaps associated with co-ordinating the delivery of necessary large-scale infrastructure provision, this could delay delivery of the rural town with significant implication for housing land supply. It is noted that LPDS paragraph 3.40 acknowledges these concerns, stating that *"Delays in securing the funding needed for strategic infrastructure will impact on the timing and scale of development that can be delivered"*.
- 5.16 Paragraph 3.40 thereby goes on to state that: *"The council is bidding for additional funding to invest in the improvements needed to strategic infrastructure to support growth over the plan period. Transport forms the core of the strategic infrastructure investment proposals"*. It is unclear how these infrastructure aspirations will be realised should the bid fail. This is clearly a significant risk to delivery.
- 5.17 The risks arising from delayed delivery of the rural town can be mitigated by allocating a range of smaller sites in addition to the large allocations at the rural town, including brownfield sites but also suburban sites. This issue is considered further below.
- 5.18 A further issue relates to the scale and type of development that is assumed to be coming forward at the rural town. It is noted that Scenario 2 assumes that should major transport infrastructure improvements be secured greater densities will be achievable in some parts of the rural town. We urge a note of caution in this regard, from a commercial perspective we would not expect higher densities to be deliverable across the vast majority of the rural town, even with the benefit of a rail link. Assumptions in this regard must be robust, it is noted that no evidence has been included in this regard.

iii) Spatial Development Strategy

- 5.19 In summary, it is considered that there is insufficient information to assess the robustness and soundness of the key components of the proposed spatial development strategy (brownfield land and the rural town) at this stage in the Plan making process.
- 5.20 To ensure the strategy is properly tested it is essential that an updated SLAA, a robust IBP and Sustainable Transport Strategy are published in support of the Regulation 19 consultation.
- 5.21 Given the potential brownfield capacity and infrastructure delivery issues identified above, it is considered likely that at least some replacement alternative sites will need to be identified in the Plan to ensure that the housing requirement and trajectory can be achieved.
- 5.22 It is thereby essential that the Council maintains an 'open mind' as to potential alternative development sites that can effectively contribute towards achieving the housing requirement and ensuring that the Plan is sound.

6.0 DEVELOPMENT SCENARIOS

- 6.1 Notwithstanding our concerns regarding the Council's failure to properly engage with the standard method's higher housing requirement for Medway, the LPDS acknowledges that not all of the growth required over the plan period can be accommodated on brownfield land and at the rural town.
- 6.2 The LPDS thereby explains that some growth will need to be directed towards other locations in the Borough. These other locations comprise a key part of the variation between the different development scenarios that are identified in the LPDS. The other locations identified as part of one or more of the development scenarios comprise:
- Peninsula Villages;
 - Lodge Hill;
 - Suburban Area.
- 6.3 It is understood that these different scenarios/locations are not mutually exclusive, and that the preferred spatial development strategy will likely comprise a combination of different scenarios/locations.
- 6.4 It is the purpose of this section to consider the other locations identified in the different scenarios. Fundamentally we consider that significantly more growth should be directed towards suburban areas to reduce the reliance upon the Hoo Rural town and improve the robustness and soundness of the Plan, particularly with regard to deliverability.
- 6.5 We note that the absence of an up-to-date SLAA causes difficulties in respect of understanding the assumptions made concerning the development potential of different components of the development strategy scenarios, making meaningful comparison challenging. In the absence of site capacity and suitability information, it is only possible to assess the different scenarios in relatively general terms. It is essential for the robustness of further consultation that this information is made available.

i) Peninsula Villages

- 6.6 All of the Scenarios appear to identify growth at the smaller Peninsula Villages, with potential allocations at High Halstow, All Hallows and Lower Stoke (although this site is excluded under Scenario 4).

- 6.7 We are concerned with this approach since the sustainability of these sites is entirely dependent upon the delivery of the rural town. The infrastructure required to realise sustainable development in these locations, most notably highways and sustainable transport, is completely reliant upon the rural town coming forward. These sites cannot on their own expect to fund this strategic 'Peninsula wide' transport infrastructure. Without this strategic infrastructure these sites are extremely isolated and thereby inherently unsustainable.
- 6.8 Given the interdependence of these village sites with the rural town, they do nothing to address the concerns outlined under Section 5 that the development strategy is over reliant on the rural town, and that any delay to the town will mean that the Plan will fail to meet the required housing trajectory. In short, these sites do nothing to help the Council manage the risk associated with a single large-scale development.

ii) Lodge Hill

- 6.9 All four of the scenarios include at least some development at the former Chattenden Barracks site, known as Lodge Hill. However only scenarios no.4 includes the 'full extent' of the scheme being promoted by the landowners, Homes England (HE), which comprises some 2000 units.
- 6.10 As it acknowledged at paragraph 3.53 of the LPDS, the HE scheme does involve elements of development on land designated as a SSSI. Paragraph 3.58 goes on to correctly explain that:

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

- 6.11 Whilst the LPDS explains that HE is in the process preparing evidence which seeks to demonstrate that the benefits of development will outweigh the likely impacts upon the SSSI, this is not currently available.
- 6.12 As such there remains a significant degree of risk that directing development toward the former Barracks site will be considered contrary to national policy and international regulations and thereby unacceptable. Relying on the full extent of Lodge Hill as part of the Local Plan development strategy thereby introduces a significant element of risk to the soundness of the Plan.

- 6.13 Furthermore, it is also noted that the scheme being promoted by HE assumes a density of approximately 42 dwellings per hectare. This is an exceptionally high density for such a rural location. It is unclear how this could be considered consistent with the objectives of a 'rural town' in placemaking terms. There is a risk that a high-density development in a rural location will be unattractive to prospective residents, which would necessarily result in densities being reduced over the lifetime of the development, undermining the housing land supply position.
- 6.14 Finally, it is noted that the Lodge Hill scheme is also entirely dependent upon the strategic, Peninsula wide infrastructure being delivered in support of the rural town. Again, this demonstrates a reliance on the rural town to realise the housing target, with the associated risks this entails to the housing trajectory.

iii) Suburban Areas

- 6.15 The above analysis has highlighted that the development strategy is heavily reliant upon the rural town to achieve the housing requirement. This reliance on what is effectively a single strategic development, introduces a considerable degree of risk in terms of delivery and the housing trajectory.
- 6.16 To mitigate this risk, sites elsewhere in the Borough can be allocated, ensuring that delivery does take place even if delays occur to the rural town for whatever reason. It is thereby noted that the LPDS does consider allocation of development in 'suburban areas', albeit on to a very limited extent:
- Scenario 1 – includes sites at North of Rainham and Capstone Valley;
 - Scenario 2 – includes one site at North of Rainham only;
 - Scenario 3 – includes sites at North of Rainham, East Rainham and Capstone Valley;
 - Scenario 4 – includes sites at North of Rainham and Capstone Valley.
- 6.17 Scenario 1 indicates that approximately 10% of the required allocations would be directed towards Suburban Areas. Under Scenario 1 this equates to around 1650 dwellings. However, this does not have regard to the emerging standard method requirement. It is noted that Scenario 3, which does seek to accommodate the standard method requirement, does appear to direct more growth towards suburban areas.
- 6.18 The LPDS explains at paragraph 3.37 that: *"the release of land in the wider suburban areas is restricted due to concerns about the ability to mitigate transport and environmental impacts"*. It is noted that no evidence is referred to as underpinning these concerns. It is reiterated

that, if the Council wishes to make the case that these areas cannot accommodate development due to 'constraints' (and thereby the standard method OAHN can be achieved) robust evidence will need to be provided.

- 6.19 As a matter of principle, we consider that a much greater level of development should be directed towards the suburban areas, to diversify delivery and ensure that housing requirement and trajectory has a greater prospective of achievement.
- 6.20 Furthermore, it noted that the directing growth towards well located urban extensions (such as our site) can make a very positive contribution toward the economic sustainability of existing towns and the vitality of existing town centres. This is thereby considered to be very much in accordance with the draft strategy's emphasis on regeneration first. It is clear that the development of our site has the potential to contribute to the regeneration of Gillingham in particular.
- 6.21 Notwithstanding the above, we note that there is no justification for directing growth towards North Rainham, East Rainham or Capstone rather than other locations including our Site (albeit it is acknowledged that this may emerge when the SLAA is published).
- 6.22 Indeed, it considered that North Rainham, East Rainham or Capstone are relatively unsuitable and unsustainable, with significant landscape impacts, highways constraints and remoteness from services and facilities. In contrast, and as is noted in Section 2 we consider our Site to be entirely suitable, available and deliverable. Most notably we consider our Site to be in a more accessible location, with far better access to public transport opportunities and proximity to local services and facilities and also to be of much lower landscape quality due to the urban fringe detracting features.

7.0 GILLINGHAM FOOTBALL CLUB

7.1 Draft Policy I9 deals with Gillingham Football Club (GFC). The draft Policy states:

“The Council recognises the positive benefits of a successful football club to the Medway community and economy and will work positively with the club to find an appropriate site for the development of a new stadium with associated facilities that should include education, employment, sports and leisure, community use and hotel and conference facilities. Any proposals must demonstrate the sustainability of the site, include an Environmental Impact Assessment and demonstrate the benefit to Medway as a place to live, work, learn and visit”.

7.2 Whilst the we broadly support the approach being taken by Policy I9, we are disappointed that the Council do not appear to be specifically considering locating a new stadium for GFC on land adjacent to the Site.

7.3 It is unclear why this option has fallen away given that Mill Hill (the land adjacent to the Site) is in our view an entirely appropriate site for a new GFC stadium for several reasons including:

- Mill Hill is directly adjacent to the existing urban boundary of Gillingham and thereby retains the clubs historic link to the town, community and fans;
- Mill Hill is well located in term of existing transport link, specifically it is on the main urban road network and close to bus and rail links; and
- Mill Hill is free from environmental constraints.

7.4 We thereby consider that the Council should continue to explore the potential of Mill Hill (the land adjacent to the Site) to accommodate the new stadium for GFC.

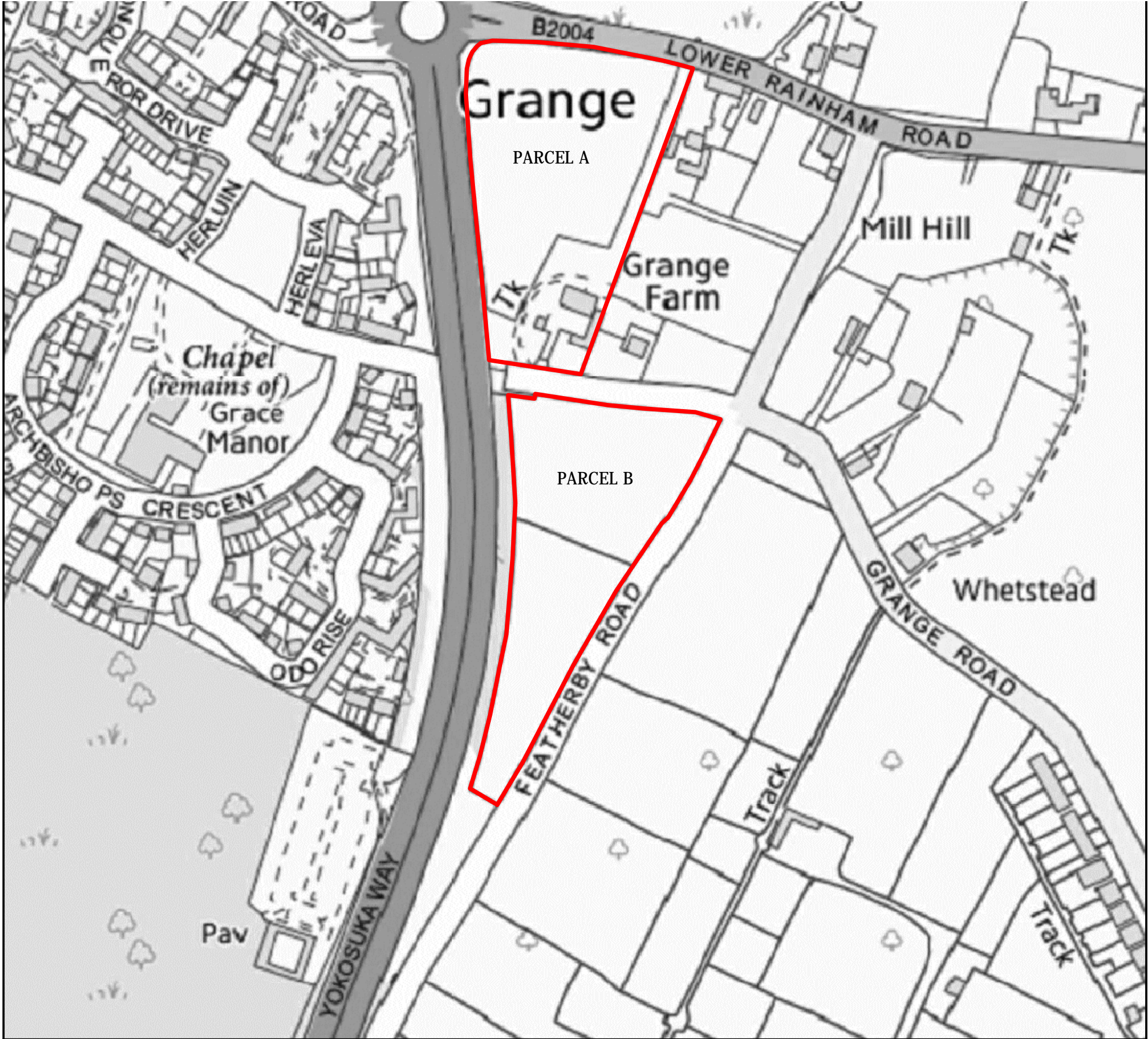
7.5 Notwithstanding our support for a new stadium on land adjacent to the Site, we must emphasise that we consider our Site to be entirely suitable, achievable and deliverable without the new stadium coming forward.

8.0 CONCLUSIONS

- 8.1 The NPPF and PPG both put sustainable development at the heart of the planning system (NPPF, para 7) for both plan-making and decision-taking, and describes it as covering three main aspects namely economic, social and environmental.
- 8.2 In summary, we are gravely concerned that the Council have failed to take the opportunity presented by the LPDS to properly consider and address the implications of the emerging standard method housing requirement for Medway. We consider that the Council will need to allocate more land if the Plan is to be found sound.
- 8.3 It is also very concerning that the evidence base in support of the LPDS is missing the SLAA and IDP. In the absence of these documents it is very difficult to consider the robustness of the draft development strategy.
- 8.4 Notwithstanding the above, it is apparent that, the spatial development strategy is heavily dependent upon the rural town and as such is very much placing 'all of its eggs' in one basket.
- 8.5 Further it is clear that in evolving the spatial development strategy, only limited thought given to the need to direct more growth to suburb areas. It is considered essential for the soundness of the Plan that more growth is directed towards the suburban areas to reduce reliance on the rural town and help achieve the standard method housing requirement.
- 8.6 It is thereby recommended that the Council gives careful consideration to how urban extensions can effectively and positively contribute towards a sustainable development strategy for the Borough, rather than seeing these as automatically unacceptable.
- 8.7 We consider that our Site can be brought forward entirely in accordance with the broad aspirations of the Council's spatial development strategy, in particular the key principle of supporting urban regeneration.
- 8.8 The Site is assessed to be suitable for development, given the absence of overriding constraints, and would deliver sustainable development, located adjacent to the existing urban edge. It would also support the ongoing regeneration of Medway, by delivering growth and contributing to the viability of Gillingham.
- 8.9 The Site is currently available for development, equally owned by Taylor Wimpey and Persimmon Homes both being large National house builders, and has a realistic prospect of housing being delivered within 5 years to meet short term development needs.

APPENDIX A

Site Location Plan (M01)



LEGEND

 Site Boundary



Project
**Mill Hill
Gillingham**
Drawing Title
Site Location Plan

Date 29.04.14	Scale 1:2500@A3	Drawn by HS	Check by KD
Project No 22372	Drawing No M01	Revision -	



**BARTON
WILLMORE**

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bartonwillmore.co.uk



maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 10:16
To: futuremedway
Cc: [REDACTED]
Subject: MEDWAY DEVELOPMENT

Importance: High

Categories: Blue Category

[REDACTED]

Dear Sir

I have been alarmed by the councils seemingly indiscriminate building schedule, for my local area

We have been provided with figures of projections housing requirements ?? for Medway , but seemingly a majority of the current new builds are occupied by people not from the local area and suspect the actual remit of the government /council is to use the local rural area for overspill from London and would also state that the council welcomes the extra poll tax for its coffers

Seeming the plan will be for social housing turning large parts of the area into a council estate, with its related problems , or as a present, a part of the housing being purchased by private individuals and rented out

We have already seen building on adjacent farm land of a large development , and now have the commencement of building on local football pitches, a cricket field , bowling green and on land which was formally a social club. Also the council have shut the local golf course , under the guise that it was a loss maker, so I suspect this land is also earmarked for development, although the council cannot or do not want to comment on this

The land inspectors seemingly are not taking into account the recreational needs of the community the rural landscape, which the local residence treasure and the adverse effects on the abundant wildlife

The council seem intent on allowing building developers to expand building on any vacant land for which they receive applications , and whilst local residents have objected to the current building the council, with government building projections as a target obviously put money cash flow ahead of the local community

Finally I appeal to Kelly in cc, to bring full strength to bring these matters under control through parliament

Kind Regards



Ken Bugg – Customer Support Clerk

Geodis Freight Forwarding Ltd
LHR1 - 145 Faggs Road
Middlesex
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Errors & Omissions Excepted (E&OE)

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Registered in England No. 621547

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

Date: 25 June 2018
Our ref: 06715/PW/BE/15831271v1

Dear Sir/Madam

Representations to Medway Local Plan: Regulation 18, Development Strategy Consultation

This letter has been prepared by Lichfields on behalf of our client, the Peel Group, including Peel Holdings (Land **and Property**) Limited ("Peel").

Peel is a private real estate, media, transport and infrastructure investment company who is a major landowner in Medway. Lichfields has previously submitted representations on behalf of Peel in relation to **their landholdings at Chatham Docks (SLAA Ref: o824), Wooley's Orchard** (Land at Lower Rainham Road) (SLAA Ref. 0749) and Land East of Seymour Road (SLAA Ref. 1047). Lichfields has attended (on behalf of Peel), Local Plan workshops relating to East of Rainham.

This letter comprises formal representations to the Local Plan Development Strategy Consultation (including the draft Medway 2035 document) in respect of the emerging Medway Local Plan. Peel welcomes the opportunity to be involved in the creation of policies that will form part of the emerging Local Plan. These representations provide comment in relation to the various options proposed within the consultation document relating to sustainable development strategies and housing strategies.

Development Strategy

1 Scenario 1 (meeting Objectively Assessed Need)

In this scenario, the Council is seeking to meet the objectively assessed need (OAN) for housing as identified in the North Kent Strategic Housing and Economic Needs Assessment (SHENA) (2015) (i.e. 1,281 homes per year, or 29,463 homes over the plan period). The strategy seeks to firstly direct growth to brownfield urban sites, to realise the potential of regeneration. This includes identified waterfront regeneration sites, together **with 'opportunity areas' in and around town centres with the potential for** redevelopment. This is then complemented by the proposed development of a rural town and some suburban expansion. This scenario allocates land at Lower Rainham Road as a potential development site and land at Chatham Waters/Chatham Docks Estate.

In line with national policy, Peel endorses development on existing brownfield sites; and appropriate edge of suburban/rural locations. Peel therefore supports the housing delivery principles set out in this scenario.

Peel considers its landholdings at Chatham Docks and Lower Rainham Road are well placed to accommodate growth in line with scenario 1. This scenario will allow for high density flats and important family housing to be provided. The latest Strategic Land Availability Assessment (SLAA, January 2017) identifies **Peel's** landholdings at Chatham Docks as both available and suitable for up to 2,577 dwellings. High density development provides an opportunity to rejuvenate underused brownfield sites to create sustainable communities and make a meaningful contribution towards the identified housing need. The SLAA also identifies land at Lower Rainham Road as being both available and suitable for up to 232 dwellings - this site is capable of being developed to meet housing need in the short term and can address the current shortfall in **Medway's five-year land supply**. Land East of Seymour Road is also capable of being developed to meet **Medway's** housing need.

Peel however disagrees with the OAN for housing need being based on the 2015 SHENA OAN (i.e. 1,281 homes per year, or 29,463 homes over the plan period). The draft revised NPPF was released on 5 March 2018 and incorporates policy proposals previously consulted on in the Housing White Paper (February 2017) and the Planning for the Right Homes in the Right Places consultation (September 2017). The draft framework sets out a new standard methodology for calculating housing need. It is based on the latest sub-national household projections, published by the Office for National Statistics. An adjustment is then made, based on the affordability of homes in a council area, capped to prevent a significant increase in the local housing need which may not be deliverable. In Medway, the housing delivery rate using the standard methodology is 1,665 homes a year, or 37,143 homes over the plan period.

The Government has expectations that local planning authorities use this standard method of calculation where emerging Local Plans have not yet been submitted for independent Examination before Spring 2018 (as is the case here). Given this, **Medway's OAN should be based on the Government's** standard methodology for calculating housing need, not the SHENA. Any future policy wording should therefore reflect this.

2 Scenario 2 (investment in infrastructure to unlock growth)

This scenario follows the development strategy set out at Scenario 1, but explicitly considers the implications and approach to masterplanning and design that could arise from the introduction of a new passenger rail service and stations. This results in bringing forward development at a faster rate on the Hoo Peninsula, and achieving greater capacity on some sites that are appropriate for higher densities in accessible locations. The higher and faster rates of delivery that could be supported in this scenario would reduce the need to release some sites in suburban areas, where there are more limited opportunities to mitigate transport impacts. This could remove land in the Capstone Valley and to the north of Rainham from proposed development allocations. Based on this approach, Lower Rainham Road is not allocated as a proposed development site. Land at Chatham Waters/ Chatham Docks Estate is however allocated for development.

In accordance with paragraph 47 of the National Planning Policy Framework (NPPF, 2012), local planning authorities are expected to deliver a wide choice of high quality homes to meet their OAN, which includes demonstrating a **5-year housing land supply**. **Medway Council's latest Annual Monitoring Report (December 2017)** identifies that in 2017 there were **642 housing completions, which falls below the Council's 1,000 home** requirement per annum. The Report also identifies a long-standing deficit for the period 2013-2017, of 2,178 homes. The National Planning Policy Guidance (NPPG) states LPAs should tackle any housing deficit within the first five years of the plan period, where possible.

Whilst Peel recognises that infrastructure improvements are required, the infrastructure requirements envisaged in scenario 2 are not short-term goals and therefore sites should also be allocated that are capable **of being delivered in the short term in order to address Medway's** current shortfall in housing supply. **Peel's landholdings at Wooley's Orchard and Land East of Seymour Road are capable of** being developed to meet housing need in the short term and can address **the current shortfall in Medway's** five-year land supply. Land

at Lower Rainham Road has been identified as both available and suitable in the **Council's latest Strategic Land Availability Assessment (SLAA, January 2017)**. It is important that deliverable sites such as these are included in the Local Plan strategy, alongside sustainable urban extensions and larger sites, which will take much longer to come to fruition.

3 Scenario 3 (meeting **Government's proposed** calculation of Local Housing Need)

This scenario responds to the definition of local housing need by the government's proposed standard method, as discussed above (i.e. 1,665 homes per year, or 37,143 homes over the plan period). The key components to increasing the supply of housing in this scenario would require a reliance on the development of the urban opportunity areas and achieving high densities on appropriate sites. Lower Rainham Road is allocated as a proposed development site in this scenario, along with land at Chatham Waters/ Chatham Docks Estate.

As outlined fully in the response to scenario 1 above, Peel considers **Medway's OAN should be based on the Government's** standard methodology for calculating housing need, not the SHENA and therefore Peel fully supports this scenario. Peel considers its landholdings at Chatham Docks, Lower Rainham Road and Land East of Seymour Road are well placed to accommodate growth in line with this scenario, recognising that land at Lower Rainham Road and land East of Seymour Road are well placed to deliver housing in the **short term and can address the current shortfall in Medway's five-year land supply**. The Chatham Waters/ Chatham Docks Estate is a brownfield site which offers substantial regeneration opportunities to accommodate future development needs in Medway over a longer time period. The existing leases at Chatham Docks expire in 2025, and at this time it is proposed to relocate these businesses to the Port of Sheerness to enable the site to become available for redevelopment. The Port of Sheerness is a key deep water commercial port in the sub-region. Peel Ports is promoting and implementing a comprehensive masterplan to expand this port function and this will adequately serve the businesses within the Medway area.

4 Scenario 4 (consideration of development within Lodge Hill SSSI)

An application for the development of 5,000 homes at Lodge Hill was withdrawn last year (following extensive objections). An emerging proposal for the development of 2,000 homes is now being progressed. This potential scenario involves development on this SSSI land (Lodge Hill) and has been included so that a transparent and objective assessment of the impacts arising from the potential development can be made as part of the Local plan consultation process. All other components of land supply in this scenario are the same as outlined in scenario 1. Lower Rainham Road is allocated as a potential development site in this scenario, along with land at Chatham Waters/ Chatham Docks Estate.

As outlined above, Peel believes priority should be given to development on existing brownfield sites; and then appropriate edge of suburban/rural locations and therefore supports the principles of scenario 1 (which scenario 4 follows, other than the Lodge Hill proposals). Notwithstanding this, Peel disagrees with the OAN for housing need being based on the 2015 SHENA OAN – as discussed above, it should be based on the **Government's** standard methodology for calculating housing need.

Whilst Peel recognises the need to allocate a range of sites, which can be delivered over the short and longer term, the Council must ensure that sufficient sites are allocated which are capable of being delivered in the **short term in order to address Medway's current shortfall in housing supply. It is important that deliverable** sites such as these are included in the Local Plan strategy, alongside sustainable urban extensions and larger sites, which will take much longer to be realised.

Summary

In summary, in line with national policy, Peels encourages the development of existing brownfield sites, but notes that appropriate incremental suburban/rural development is also needed. These priorities will ensure a broad range of sites in terms of the location and types of dwelling are provided, ensuring the needs of the different sectors of the population are met. High-density riverside development on brownfield sites and incremental suburban development provides a significant opportunity to achieve a balanced development strategy and Peel therefore considers that this should be a priority. The nature and deliverability of **Peel's** landholdings would contribute positively and actively to meeting the overall housing requirement for Medway over the Local Plan period.

Peel considers that **Medway's OAN should be based on the Government's** standard methodology for calculating housing need, not the SHENA. The Government has expectations that local planning authorities use this method of calculation where emerging Local Plans have not yet been submitted for independent Examination before Spring 2018 (as is the case here).

Policy Approaches

Policy DS2: Spatial Development Strategy – The Council suggests the development strategy for Medway will prioritise regeneration, making the best use of underused and previously developed land and directing investment to urban waterfront and centre opportunity areas. The Council will consider a lesser scale of development in defined sites in suburban locations where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.

Peel supports the Council's approach outlined in Policy DS2. Peel considers that the first priority should be development on non-green belt land, in particular brownfield land, under-utilised land and appropriate suburban incremental development. Brownfield sites offer sustainable regeneration opportunities and the NPPF encourages the effective use of land by reusing land that has been previously developed (paragraph 17). Chatham Docks is a brownfield site which, as outlined previously, offers substantial regeneration opportunities to accommodate future development needs in Medway.

The acknowledged need to supplement regeneration with development elsewhere in Medway is supported by Peel. Development of sites in suburban locations has the potential to utilise sustainable and well connected infill plots on the edge of existing settlements to meet the housing requirements for families. This type of land is often available for development in a timely manner and as such can help to contribute towards the **Council's immediate housing need. Peel's landholdings in Rainham** (land at Lower Rainham Road and land East of Seymour Road) provide potential to assist in the incremental expansion of Rainham and contribute **meaningfully towards meeting Medway's housing need.**

Policy H1: Housing Delivery – The Council suggests it will seek to provide a supply of land to meet the needs for market and affordable housing that responds to the objectively assessed need for housing, and meets the principles of sustainable development.

Whilst Peel supports this policy approach to housing delivery, as outlined above, the Government has expectations that local planning authorities use its standard housing calculation method where emerging Local Plans have not yet been submitted for independent Examination before Spring 2018 (as is the case here). The OAN must therefore be based on the definition of local housing need by the **Government's** proposed standard methodology (i.e. 1,665 homes per year, or 37,143 homes over the plan period).

Policy H2: Housing Mix – The Council suggests that accommodation requirements as detailed in the SHMA 2015 (or any future updates) will be used to help inform which house sizes and mix should be delivered in urban and rural areas to meet the objectively assessed needs of the area.

Whilst Peel agrees with this approach, any emerging policy should allow for suitable flexibility to allow housing mix to have regard to market conditions and viability at the relevant time. It is important to reiterate that high density town centre and riverside developments provide an opportunity to rejuvenate underused brownfield sites, to create sustainable communities and make a meaningful contribution towards the identified housing need. Such developments predominantly comprise smaller housing units, typically 1 to 2 beds. An example of the positive contribution this development option can make is the Chatham Waters Development which has outline approval for 950 residential units on a 14.6ha site (Ref. MC/11/2756).

Development of sites in suburban locations has the potential to meet the housing requirements for families and therefore will predominately comprise larger, family units.

Policy H3: Affordable Housing – The Council has split its affordable housing provision targets between rural and urban Medway (30% in rural Medway and 25% in urban Medway), compared previously to a blanket figure of 25%.

No evidence supporting this change of approach has been provided at this time and therefore Peel cannot comment on the acceptability of the approach. Evidence should be provided to enable comment to be made. Notwithstanding this, the requirement for affordable housing needs to be kept under review and is inextricably linked to the OAN, the range of housing sites allocated, the appropriate density of development on allocated sites and individual site circumstances.

Policy BE4: Housing Density Approach - The Council suggest that it will seek the efficient use of land through higher density development in appropriate locations.

Peel supports the Council's approach to seek the efficient use of land through higher density development in appropriate locations. Notwithstanding this, Peel considers that Riverside areas in particular provide opportunities to achieve higher densities and critical mass, without adverse impacts from taller buildings. The advantages of high density riverside development in meeting new lifestyle trends are clear and this type of development will have an important role in meeting the OAN. This should be recognised in the wording of emerging local plan policy.

Policy T5: Riverside Infrastructure - The Council suggests it will require bespoke sustainable transport solutions, including the assessment of the re-use of the disused line from the docks as a link to Gillingham station.

Peel is concerned that this wording is overly prescriptive. Whilst Peel will review all modes of sustainable transport available to ensure the most appropriate link is created between Chatham Docks and Gillingham train station, it does not consider a full assessment is required. It is considered that a pedestrian footpath and cycle lane along the old railway track linking Chatham Waters to Gillingham Station would be the most appropriate solution due to the poor existing pedestrian and cycle links in the area. Such links would helpfully connect the existing housing estate to the train station and the river waterfront.

Medway 2035

The draft Medway 2035 document complements the Local Plan by developing a structured route map in support of the policies for growth, identifying eight priorities as the focus for regeneration actions over the short, medium and long-term.

Peel supports this draft document as it recognises the contribution the Chatham Waters/Chatham Docks Estates can make towards **the Council's** regeneration priorities. It also aligns with the NPPF which encourages the effective use of land by reusing land that has been previously developed (brownfield land) (paragraph 17). As outlined previously, brownfield land (i.e. including Chatham Waters/Chatham Docks

Estate) provides key regeneration opportunities and can help to create sustainable communities which make a meaningful contribution towards the identified housing need.

Sustainability Appraisal

Arup has undertaken a Sustainability Appraisal (SA) of the emerging Local Plan, reviewing the development scenarios and emerging draft policies. Peel has the following comments:

- 1 Section 5.1.6 outlines that land at Lower Rainham Road (amongst other sites) supports areas of open space that have potential to provide supporting habitat. It goes on to state that the exclusion of some of these site allocations from Scenarios 2 and 4 indicates that these scenarios are preferable when considering the implications of supporting habitat.

As outlined above, land at Lower Rainham Road has been identified as both available and suitable for **development in the Council's latest SLAA (January 2017). Peel disagrees that this site should be** excluded from development scenario 2. Habitat surveys were carried out in 2014, 2016 and 2018 to ascertain the general ecological value of the land contained within site and to identify the main habitats and associated plant species. The site is not considered to be of high intrinsic value from an ecology and nature conservation perspective and any future development proposals can include suitable open space provision and mitigation measures to ensure there are no adverse effects on any designated sites or protected species.

- 2 Section 6.8.5.1 should recognise that Chatham Docks can provide a mixed use, multi-functional purpose for economic and housing growth through both business and tourism opportunities. This should also be recognised in emerging policy T5 (Riverside Infrastructure).
- 3 Section 6.8.5.2 does not make reference to the fact there have been significant road improvements to the junctions on Pier Road that feed into Chatham Docks. These improvements have been delivered by the private sector and equate to around £7 million worth of investment.
- 4 Page 94, SA Recommendations - the need for the provision of new parks and play spaces in developments should be flexible, taking into account existing nearby provision.

Summary

We consider that the suggestions set out within these representations are appropriate and will assist in ensuring sustainable, viable and deliverable development within Medway. We trust these will be taken into consideration.

Should you have any queries or require any further information, please contact myself or my colleague, Peter Wilks.

Yours faithfully

A black rectangular box redacting the signature of Beth Evans.

Beth Evans
Senior Planner

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

BY EMAIL TO FUTUREMEDWAY@MEDWAY.GOV.UK

27537/A5/GW
25 June 2018

Dear Sir / Madam,

MEDWAY COUNCIL LOCAL PLAN - DEVELOPMENT STRATEGY CONSULTATION
REPRESENTATIONS ON BEHALF OF SCOOP ASSET MANAGEMENT

Please find below representations to the Development Strategy consultation on behalf of our client Scoop Asset Management (Scoop AM). Scoop AM has an interest in the Orchard Kennels site, Meresborough Road, Rainham.

Representations were made to the previous Development Options consultation, promoting the site for development and including a Development Feasibility Study produced by Pod Architects

These new representations are submitted following the assembly of a larger site (to incorporate the Abbey Developments Ltd land to the north), which provides better opportunity for integration with the existing settlement and access from Meresborough Road.

A further development site plan accompanies this representation, which provides further consideration (in broad terms) of how the site could potentially be developed.

Strategic Objectives

Medway is the biggest regeneration zone in the Thames Gateway Regeneration Area, which seeks to raise economic success and boost the delivery of infrastructure and housing.

We therefore support the ambitions of the Council [and their vision for Medway in 2035] in seeking to harness the opportunities of Medway (including its high-speed train links, universities, and its diverse offer of services and businesses) to establish a regional profile for successful and ambitious growth that will share the accrued benefits from wider strategic developments.

Development Strategies and Housing Requirements

The North Kent Strategic Housing and Economic Needs Assessment (NKSHEA) identifies an objectively assessed need (OAN) of 29,463 homes.



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However, over this assessed projection period (2012 -2037) there is a calculated need for 18,592 affordable dwellings (744 dpa) constituting 58% of the total number of dwellings required to deliver the OAN figure. The **Council's current affordable housing policy target of 25 - 30%** would therefore be insufficient to deliver the identified affordable need of 744 dwellings per annum. The NKSHEA acknowledges (at para 6.55) that this could justify the increase in the housing requirement.

Moreover, the Development Strategy accepts the **Government's expectations that local planning** authorities use the Standard Method to calculate housing need (where emerging Local Plans have not yet been submitted to independent Examination before Spring 2018). This is the case for Medway and would equate to the need for circa 37,000 homes over the plan period (see paragraph 3.7 – 3.8 of the Development Strategy document).

Para 47 of the NPPF seeks to boost significantly the supply of housing. It states that local authorities should:

'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far is consistent with the policies set out in the Framework.'

Accordingly, it would not be justified at this time to progress a strategy that seeks to undermine the delivery of the full housing needs identified by the Standard Method (or that would not tackle the housing affordability issues identified in the NKSHEA).

While it is accepted that larger growth will inevitably mean greater effects (as highlighted in the sustainability appraisal in section 5), **the Council in seeking to positively prepare a plan to meet Medway's growth (3.13)** should investigate mitigation opportunities to allow this level of growth to be accommodated rather than consider alternative options with self-imposed barriers on growth as appears to have been the case in the Development Strategy document.

It is not the case that the need for development will vanish after 2035 so a sustainable approach to delivering the full Standard Method OAH growth that seeks to address the effects of development should be pursued.

If it is considered that the larger growth will have significant social and environmental consequences, the sustainability appraisal should investigate what is the tipping point in terms of these effects. This has not been done so it is difficult to support a lower housing requirement as shown in Development Options 1,2, and 4 in the absence of this understanding.

To this end, we consider the strategy should be a balance between Scenario 1, 2, and 3 which seeks to progress a strategy that delivers the Standard Method OAH up to the point that the sustainability appraisal concludes that effects are too adverse (taking into account opportunities to mitigate against these effects). This is not clear at present.

Orchard Kennels, Rainham

The Orchard Kennels site is identified for development in Scenario 3. This is part of a larger allocation at Siloam Farm. However, the site could come forward as a smaller proposal for residential development and open space (or as part of the wider allocation) and provide additional housing in the short term to complement options 1 and 2.

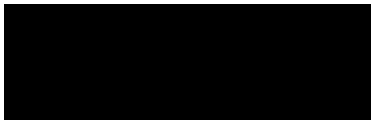
The site is located adjacent to the recently approved Redrow development at Oastview. It is in close proximity to Rainham station and provides a sustainable development opportunity (as acknowledged by the approval of

the Redrow scheme) and would square of the settlement limits providing a more durable development boundary to the south of Rainham.

The accompanying Proposed Site Plan provides an initial illustrative scheme as to how the site could be designed to accommodate 146 homes and open space, which is considered appropriate for the location.

The scheme also includes the potential for a large bespoke (perhaps self-build) dwelling to provide interest and character.

Yours faithfully



GRAEME WARRINER
Planning Director

Proposed Site Plan - March 2018



KEY:

	CLIENT'S HOUSE		EXTENDED SITE BOUNDARY
	5 BED HOUSE		EXISTING SITE BOUNDARY
	4 BED HOUSE		
	3 BED HOUSE		
	2 BED FLAT		

TOTAL UNITS ACROSS ENTIRE SITE:

- 5 BEDS = 7
- 4 BEDS = 55
- 3 BEDS = 54
- 2 BEDS = 30

TOTAL = 146 UNITS

TOTAL UNITS WITHIN EXISTING SITE BOUNDARY:

TOTAL = 112 UNITS

UNIT SCHEDULE + CAR PARKING PROVISIONS:

- 2B Flats: 30
- 2B Flats: 15 car parking space (0.5 per unit)
- 3B Semi-Detached House: 54
- 3B Parking: 95 Spaces (1.7 per unit)
- 4B Detached House: 5
- 4B Semi Detached House: 30
- 4B Terraced House: 20
- Overall 4B: 55
- 4B Parking: 110 (2 per unit)
- 5B Detached House: 6
- 5B Parking: 12 (2 per unit)
- Client's House: 1
- Parking spaces: 4
- Visitors Parking: 0.2 per unit
- Communal Green space: 2300 Sq.M

Medway Council Local Plan
Issues and Options 2012-2035

3rd Regulation 18 Consultation

June 2018

Consultation response
by



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1 INTRODUCTION

1.1 Background

1.1.1 Dean Lewis Estates Limited is a professional strategic land promotion company specialising in the delivery of residential and mixed-use development.

1.1.2 This submission provides Dean Lewis Estates Limited response to and representations in respect of this third round of Regulation 18 consultation into the Medway Local Plan Development Strategy consultation 2012-2035 (LPDS).

1.1.3 This submission focuses on the key planning policy considerations for the Medway Local Plan in order to enable its successful implementation, thereby sustainably meeting the identified full objectively assessed needs for housing (OAN) and enabling the wider regeneration of Medway to continue in concert with economic growth and delivering significant social and environmental net gains throughout the plan area.

1.1.4 For completeness, it is also appropriate to state that Dean Lewis Estates Limited is part of a consortium of promoter and developer partners that are working together to promote development at Hoo St Werburgh to enable successful delivery of the planned growth required to meet the needs of Medway up to 2035.

1.1.5 The Consortium members comprise:

- **Church Commissioners for England**
- **Dean Lewis Estates**
- **Gladman Developments**
- Homes England
- Taylor Wimpey

1.1.6 The areas of land within the control of Dean Lewis Estates are deliverable in their own right and not contingent upon any other third-party land ownerships or infrastructure.

1.1.7 It should also be noted that the Dean Lewis Estates land has the capability to provide community benefits substantially in excess of that needed to serve the development of solely the Dean Lewis Estates land. It therefore can genuinely be regarded as playing a major role in facilitating further development at Hoo St Werburgh and supporting the needs of the wider community on the Hoo Peninsula.

1.1.8 As well as built development, the allocation of this land will secure major environmental and community benefits that will endure for future generations.

2 CONTEXT

2.1 3rd Regulation Consultation – Medway Local Plan

2.1.1 Medway Council (MC) has evolved its policy options consulting on two occasions on its Local Plan Issues and Options (LPIO) document. The first consultation took place between January and February 2016 (under Regulation 18), the second taking place in March and April 2017. The previous LPIO consultations did not set out detailed policies or identify specific development sites, rather it sought representations on key strategic and spatial policy matters relating to potential approaches that could be taken forward in the new Local Plan strategy.

2.1.2 The second Regulation 18 Local Plan Development Options (LPDO) set out a draft vision and strategic objectives for the area and four potential development options to enable Medway to meet its identified needs over the Plan period (2012-2035).

2.1.3 This current 3rd Regulation 18 LPDS consultation sets out a draft spatial development strategy (Policy DS2) which comprises a focus upon regeneration of **brownfield land and the creation of a new 'Rural Town' on the Hoo Peninsula**. Four **'Scenarios' to enable the successful implementation** of this strategy now form the subject of more a detailed consultation.

- Scenario 1 – Meeting Objectively Assessed Need;
- Scenario 2 – Investment in Infrastructure to unlock growth;
- Scenario 3 – **Meeting Government's proposed calculation of Local Housing Need**;
- Scenario 4 – Consideration of development within Lodge Hill SSSI.

2.1.4 The LPDS also identifies draft policies, on which views are sought. The LPDS is also published alongside an interim Sustainability Appraisal that applies to the draft LPDS consultation. Comments of the draft SA are also covered in this consultation response.

3 DEVELOPMENT STRATEGY & SCENARIOS

3.1 Background

3.1.1 Within this section we respond to the Consultation Questions that are set out within the 3rd Regulation 18 Development Strategy Consultation. It is evident that the four variant development scenarios are not mutually exclusive. In our view, Dean Lewis Estates would support a preferred Spatial Development Strategy that combines some of the essential elements of these scenarios to deliver potentially the most successful development Strategy for Medway.

3.1.2 Our representations and responses to the Council's key questions below are presented on this basis.

DS1:

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

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

3.1.3 The LPDS acknowledges that;

"A rural town centred on Hoo St Werburgh is included in all of the development scenarios set out in this consultation document".

3.1.4 The following representations specifically consider the matter of growth at Hoo St Werburgh and also deal with more broad ranging matters to ensure the soundness of the plan.

3.2 Hoo Peninsula Rural Town

3.2.1 The proposed Spatial Strategy (Policy DS2) focuses upon the regeneration of **brownfield land and the creation of a new 'Rural Town' on the Hoo Peninsula (HPRT).**

- 3.2.2 Dean Lewis Estates supports this approach set out within LPDS which provides **strong support for the 'Hoo Peninsula Rural Town' (HPRT)**. The inclusion of the HPRT as a key component of the spatial development strategy for Medway is fundamental to the successful implementation of the Plan as set out in Policy DS2. Draft Policy DS2 notes that;

"...Outside of the regeneration areas, the council will support the development of a small rural town based around Hoo St Werburgh that is designed to the highest standards and sensitivity to respect its countryside setting and supported by significant infrastructure investments. The development will be in accordance with a masterplan, to secure the balance of land uses, attractive and effective green infrastructure, phasing to reflect the delivery of improvements required to a range of services and infrastructure..."

- 3.2.3 The land controlled by Dean Lewis Estates forms an integral component of the HPRT delivery strategy.
- 3.2.4 Paragraphs 3.26 to 3.28 confirms that the development of a rural town on the Hoo Peninsula provides a **'core component of the strategy'**.

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

- 3.2.5 The supporting commentary relating to the HPRT also states that;

"Such a scale of growth is dependent upon significant upgrades in infrastructure, including transport, health,

education and wider community facilities. In developing a town, particular aspects need to be strengthened, such as the retail, economic and community roles”.

3.2.6 In this regard the land being brought forward by Dean Lewis Estes will make a major contribution toward the delivery of essential facilities and community infrastructure at Hoo. In addition, this site will deliver one of the two new country parks that Medway aspires to deliver for the community. This new community asset will secure significant net gains in biodiversity as well as making a major contribution to the social welling of residents of the area.

3.2.7 Within Paragraph 3.38 it is also noted that;

“The greatest care and attention needs to be given to sensitively planning growth around Hoo St Werburgh to respect the countryside setting and links to the wider estuary. The proposals would involve the creation of two new country parks, opening up access to the countryside, and mitigating the potential for negative impacts on important environmental assets”.

3.2.8 The development of the Dean Lewis Estates land will be sensitively developed ensuring its integration with the existing settlement. An expansive area of land to the south of the settlement will form a new country park that will create a major area of green space separating the River Medway from the built form. This masterplan approach will ensure that the countryside setting and links to the wider estuary are protected and enhanced in terms of biodiversity whilst simultaneously offering open access to the countryside.

3.2.9 The LPDS also acknowledges that;

*"Development would be required to recognise the importance of environmental designations, given the international and **national significance of the Hoo Peninsula's habitats and landscapes**".*

3.2.10 These principles are enshrined within the masterplan approach that has been formulated by the consortium, suffice to say that the Dean Lewis Estates component of the consortium land is also entirely consistent with these environmental principles.

3.3 Development Scenarios

3.3.1 The four Development Scenarios all vary but importantly all four are predicated on a rural town centred on Hoo St Werburgh in all of the development scenarios set out in LPDS consultation document.

3.3.2 A number of critical matters common to all four scenarios are considered below.

3.4 Key Matters

3.4.1 The following key matters are considered:

- calculating Objectively Assessed Housing Need;
- funding of infrastructure delivery;
- the development potential of Lodge Hill; and
- accommodating some growth at the small Peninsula villages.

i) Calculating Objectively Assessed Housing Need

3.4.2 A key change emerging in the Draft NPPF is the requirement to use the **Government's 'standard methodology' to calculate Objectively Assessed Housing Need (OAHN)**. The impending changes to the NPPF will mean that the Medway Plan will have to respond to these changes that affects the levels of growth to be planned for within this plan.

3.4.3 The new standard methodology OAHN figure for Medway is 37,143 over the plan period, which equates to 1,665 homes a year. This exceeds the existing housing need figure set out within the 2015 Strategic Housing Market Assessment (SHMA) figure of 1,281 homes per year. Whilst the standard methodology is not yet a formal policy requirement the plan should recognise that an early plan review maybe required to reappraise the growth policies in line with the Standard Methodology.

- 3.4.4 Paragraph 61 of the draft NPPF is clear that the standard method should be used unless there are **‘exceptional circumstance’** that justify an alternative approach.
- 3.4.5 Presently the LPDS implies that an alternative OAHN figure may be preferred going forward (namely the 2015 SHMA figure), however there is no evidence in this consultation document that justifies **‘exceptional circumstances’** to support a reduction in the OAHN.
- 3.4.6 If the NPPF is introduced prior to the adoption of the plan, which is highly likely, the council should clearly set out its position on the OAHN acknowledging the factual position that the plan is to proceed towards adoption of the plan on a lower growth figure of the of 1,281 homes per year (2015 SHMA) but also with a specified timetable for early review.
- 3.4.7 The consultation document states at paragraph 3.12 that:

*"The council will refresh its evidence base on development needs prior to the publication of the draft Local Plan for consultation. This work will take account of the updated household projections based on 2016 data, and the publication **of the government's response to the outcomes of the consultation on the Standard Method**. This refreshed evidence will support the draft plan".*

- 3.4.8 **Whilst acknowledging the Council's position on this** matter we will expect to see clear evidence that the Council has taken into account the full OAHN if the standard methodology becomes applicable prior to the regulation 19 stage of the plan as envisaged.

ii) Funding of Infrastructure

- 3.4.9 Policy DS2 is intrinsically linked to the timely delivery of infrastructure necessary to support the increased development across the plan and area and within the HPRT. LPDS Paragraph 3.39 notes that:

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

3.4.10 In this regard, the effective and timely delivery of infrastructure is also set out in detail in draft policy '**I2: Developer Contributions**'. Within the body of policy there is a stated requirement that; ***"...Where demonstrated to be necessary, the council will require that infrastructure is delivered ahead of the development being occupied..."***. Object - Delete from the Policy.

3.4.11 By arbitrarily applying a blanket principle of provision of all infrastructure ahead of occupation of dwellings will simply lead to an inundation of viability arguments being submitted to the council. Dean Lewis Estates Object to this approach within Policy I2.

3.4.12 Provision and programming of infrastructure can sensibly be agreed under the auspices of the same policy and where difficulties arise in terms of delivery only then should the effect on viability of any proposal be considered.

3.4.13 The approach set out within draft policy I2 states that; ***"Where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be expected to provide or contribute towards the additional requirement to an agreed delivery programme"***.

3.4.14 This approach is entirely consistent with flexibility that the council refer to in the ultimate paragraph of the same policy.

3.4.15 Dean Lewis Estates note that Medway Council has also applied to central government for Housing Infrastructure Funding ***"to invest in the improvements needed to provide strategic infrastructure to support growth over the plan period"*** (Para. 3.40).

3.4.16 The LPDS sets out in broad detail the nature of the infrastructure improvements for which funding is sought, which include improvements to the highway network (the Four Elms roundabout and widening of the A228) and the ***"potential use of the Grain freight line for passenger traffic"***. The Bid has been shortlisted and will be developed over the coming months before a final decision is made on the funding award.

3.4.17 We strongly support the **council's aspirations to secure the** HIF bid and to deliver the infrastructure together with the attendant benefits that arise from it. However, it is also vital to acknowledge that the lesser amount of growth proposed at Hoo St Werburgh (the Consortium Development) aside of the exponential growth capable of being developed through the HIF bid is evidentially not contingent on a successful HIF bid.

iii) Lodge Hill

3.4.18 Homes England have recently become owners of the former Chattenden Barracks site, also known as Lodge Hill. Homes England have developed a masterplan for the site which comprises some 2,000 dwellings, a new primary school and extensive open space and green infrastructure.

3.4.19 Dean Lewis Estates consider that, should the council allocate the former Barracks site, that it is a well located brownfield site which would complement and integrate with the wider proposals for the HPRT. Dean Lewis Estates also note that the delivery of development of Lodge Hill would make a positive contribution to meeting the (standard method) OAHN for the Borough.

3.4.20 Importantly however, the delivery of the HPRT is not contingent on the allocation of Lodge Hill.

iv) Accommodating Growth in the Smaller Peninsula Villages

3.4.21 It is noted that Policy DS2 indicates that:

"The council will consider a lesser scale of development in defined sites [at]...the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided".

3.4.22 Dean Lewis Estates note that a key social sustainability 'net gain' of the HPRT is the creation of an enhanced Peninsula service centre, meeting the social needs and requirements of those living on the wider Peninsula. Delivery of the HPRT and its new infrastructure will enhance the substantiality of the settlements on the wider Peninsula.

4 OTHER POLICY MATTERS

4.1 Housing

4.1.1 Policy H1: Housing Delivery states that;

"The council will determine a housing target for the Medway Local Plan, responding to the latest relevant information, in preparing its draft Local Plan"

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

4.1.2 As noted above at section 3, paragraphs 3.18 – 3.24 the **Council's position on this** will have to be reappraised having regard to impending introduction of the new Standard Methodology. We will expect to see clear evidence that the Council has considered the full OAHN if the Standard Methodology becomes applicable prior to the regulation 19 stage of the plan as envisaged.

4.2 Employment

4.2.1 Proposals for broad locations for new employment growth are shown on figure 5.1 in the LPDS. **A 'Broad Location' is shown on the Dean Lewis Estates Land at Hoo St Werburgh.** the principle of supporting incoming growth and job creation at Hoo St Werburgh is supported. However, it must be clear that the employment generation here will be created through the delivery of a Local Centre hub rather than a discreet land allocation for a business park for B1 office use.

4.2.2 In locational terms a B1 office park would not be appropriate to the land use master planning of the area nor would it be attractive in market terms.

4.2.3 A Local Centre Hub that is likely to include uses such as convenience retail offer to provide top up shopping, community uses (such as a village hall, library, nursery facility), services (such as hairdressers, cash machines) will all be employment generators in their own right. Allied to this type of employment provision incubator offices can be integrated into the Local Centre hub to provide flexible **employment space for SME's. If health provision is also a complementary** use to the District Centre this facility will also provide additional skilled employment.

4.2.4 Overall, such an allocation should be well defined too acknowledge scale and nature of local employment provision capable of being accommodated on the site.

4.3 Retail Centres

4.3.1 Policy RTC1 supports the delivery of,

*New local centres or shopping parades compliant with the **council's retail policies may be** required in the following locations depending on the defined development strategy and proposals maps in the Local Plan, the scale of the proposal.*

- *Hoo St Werburgh rural town"*

4.3.2 Dean Lewis Estates supports the principle of Policy RTC1 and, for clarity, the policy (or if appropriate, the reasoned justification) should cross refer to the appropriate scale of local employment provision being located within the Local Centre as opposed to a discreet standalone employment allocation.

4.4 Transport

4.4.1 Dean Lewis Estates representations in respect of transport are set out within the Prime Transport representations that are appended to the Hoo Consortium representations.



Ms Catherine Smith
Planning Policy Manager
Planning Policy Team
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25 June 2018

Dear Catherine

**Re: Medway Council Local Plan 2012-2035 - Development Strategy
Regulation 18 consultation document**

Thank you for inviting Kent County Council (KCC) to comment on the Medway Council Local Plan 2012-2035 - Development Strategy Regulation 18 consultation document (Development Strategy).

KCC supports the commitment from Medway Council (MC) to work with the neighbouring planning authorities in cross-boundary matters arising from the development strategy. Identified growth forecast in Medway will have an impact on key services provided in Kent, especially in areas close to neighbouring boundaries. KCC will continue to work with MC to ensure that, as growth options are developed, a clear strategy to deliver the necessary infrastructure is in place to ensure that development is sustainable. KCC is also keen to work with Medway on the promotion of well designed, sustainable growth that has consideration of a Low Emissions and Energy Strategy.

The County Council acknowledges that this consultation builds upon work from earlier stages of consultation and an evidence base of technical documents. KCC recognises the important role of the Development Strategy in setting out growth scenarios for Medway.

KCC has reviewed the relevant consultation document and sets out its comments to the Development Strategy below. Further technical comments are provided at Appendix 1.

Vision and strategic objectives for Medway in 2035 (p10)

KCC is supportive of the recognition of the significant cross boundary strategic projects and the acknowledgment of the resulting impacts this is likely to have on Medway. The Lower Thames Crossing, Ebbsfleet Garden City and the proposal for the proposed entertainment resort at Swanscombe Peninsula will all have an impact on growth in Medway and surrounding areas, traffic patterns, and demands on infrastructure.

KCC also supports the recognition of opportunities for growth in Medway, benefitting from its position in the Thames Gateway; as well as the need to protect the natural and built environment features of Medway, including those relating to the North Kent coast. In this context, KCC is supportive of the potential for mixed-use growth to transform urban waterfronts into attractive mixed use locations.

The historic and natural environment of Medway provides a challenge for growth in Medway. KCC therefore welcomes the inclusion of Medway's natural and heritage features in developing a vision of 2035. In identifying the strategic issues, development should be carried out in Medway in a way that is sensitive to its past and its environment. Development should draw on heritage assets and the landscape to be more effective at delivering the Local Plan's sustainable growth objectives.

Development Strategy (p24)

Question DS1: Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

In general, KCC would be supportive of proposals that seek to deliver Medway's growth within its boundaries. KCC has reviewed the growth scenarios put forward by Medway and notes that none of the options would meet the housing figure for Medway using the Government's standardised approach (with option 3 falling just short of the 37,173 dwellings). It is not clear whether an 'exceptional circumstances' case is intended to be made to justify a departure from this methodology.

In terms of identifying any potential cross-boundary implications, the four scenarios range in what sites they propose – although all appear to have one or more sites in fairly close proximity to Kent local authority boundaries. Any housing growth in these locations could potentially have an impact on KCC services and infrastructure. Therefore, KCC requests continued close working with MC to fully assess the development options as KCC is keen to ensure the resulting impact

on local infrastructure across boundaries and outside Medway is mitigated against, should any of the relevant sites be progressed to the next stage of the Local Plan process.

Scenario 1: Meeting the housing need of 29,500 homes: In principle, KCC would support a strategy that focusses growth on brownfield sites and waterfront regeneration, where growth is directed to urban areas and the infrastructure may already be in place or can be enhanced to support development. KCC also welcomes the proposal to include the Hoo Peninsula as a major growth area. Any highways implications with growth utilising the KCC network will need to be considered as part of any growth scenario.

KCC also recognises that this scenario proposes to bring forward sites within Capstone Valley and Rainham. KCC requests that full consideration is given by MC to the potential impacts on KCC services for these sites in particular in order to ensure that necessary mitigation measures are in place given their proximity to Kent.

Scenario 2: Investment in infrastructure to unlock growth: KCC would also support a scenario that looks to provide a higher density and faster delivery rate of homes on the Hoo Peninsula – a scenario that would rely on significant infrastructure investment. KCC recognises the associated challenges and risks, but also the opportunity presented through the Housing and Infrastructure Fund, to secure the necessary investment which is progressing to the next stage.

An additional benefit of this option is that it would not incorporate sites close to the Medway boundaries, including Capstone Valley and Rainham, both of which would have the potential to impact on KCC services.

Scenario 3: Meeting government's proposed calculation of Local Housing Need: KCC notes that this is the only option put forward that would almost meet the housing need determined using the Government's standardised methodology. However, the narrative around this scenario indicates that it might not be a sustainable option; with uncertainties over deliverability, housing mix and the loss of employment land. KCC would not support a scenario that does not provide adequate local employment options or sustainable solutions for housing growth.

KCC would request the need for further discussion for any sites identified in this scenario that are close to Kent local authority boundaries in order to determine the impact on KCC services and any mitigation required.

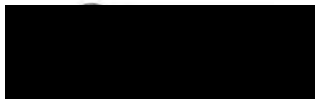
Scenario 4: Consideration of development within Lodge Hill SSSI: The delivery of a housing site at Lodge Hill that could overcome issues previously identified at this site and which would incorporate the necessary highway measures, would help considerably in delivering identified housing need for Medway through a large-scale comprehensive scheme.

KCC would again request the need for further discussion of any sites identified in this scenario that are close to Kent local authority boundaries, to determine the impact on KCC services and any mitigation required.

The County Council recognises the importance of the Local Plan Development Strategy to provide further direction to a growth strategy for Medway that responds to strategic objectives and the vision for Medway. KCC will continue to work closely with MC to support the delivery of new housing, employment and required infrastructure in response to local needs.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely



Barbara Cooper
Corporate Director – Growth, Environment and Transport

Encs:

Appendix 1: Schedule of technical comments

APPENDIX 1: KCC response: schedule of technical comments to Medway Council 'Future Medway' consultation

Pg	Reference	Policy	Question	Commentary
19	Developing a Vision for 2035			Although the historic environment does not feature as a strategic issue, KCC is pleased to see that Medway's heritage features prominently in the Vision for 2035. KCC welcomes the Heritage Asset Review that MC has already carried out and strongly supports the development of a Heritage Strategy. KCC would be happy to comment on drafts of the documents (and would also welcome the chance to comment on the draft structure before the main report is written) and requests that adequate time is provided for any commentary.
16	Strategic Issues			<p>Medway's historic environment has played a significant role in forming the character of the unitary authority today, as well as having potential as a contributor to the success of the area in the future. Medway has a wide range of heritage assets, many of which are of international importance (including 76 scheduled monuments, more than 630 Listed Buildings, and two Registered Parks and Gardens). The Kent Historic Environment Record¹ lists more than 3,300 un-designated heritage assets in Medway.</p> <p>Within the rural areas of Medway, the historic environment is similarly important. Palaeolithic remains are present at Cuxton and elsewhere along the former courses of the River Medway and the marshes and intertidal zone are important for later prehistoric remains. The rural areas are particularly important for military and industrial survivals, as well as the pattern of historic villages and lanes. Many of these sites are of national significance, but currently undesignated (e.g Cliffe explosives works). For new growth and development to successfully integrate with the historic environment of the area, it will need to work with the existing character and, if possible, enhance it.</p> <p>Among the key strategic issues is the need to regenerate and develop Medway in a way that is sympathetic to its past. At present, Rochester is a visibly historic city with many high-quality buildings and an attractive streetscape. Chatham has areas, primarily associated with the river frontage, Dockyard and historic fortifications, that are similarly attractive. In Gillingham, by contrast, historic features are less common and less visible - yet Gillingham is a historic settlement dating to Anglo-Saxon times. The river frontage contains numerous heritage assets and has great potential for heritage-led leisure and tourism. The Local Plan should seek to ensure that the heritage assets of all of Medway are used to their maximum advantage so that regeneration can be successful and durable.</p>

¹<http://webapps.kent.gov.uk/KCC.ExploringKentsPast.Web.Sites.Public/SingleResult.aspx?uid=TKE1046>

APPENDIX 1: KCC response: schedule of technical comments to Medway Council 'Future Medway' consultation

				<p>KCC recommends that MC refers to key studies and resources set out below, which should underpin any consideration and use of Medway's historic environment.</p> <ul style="list-style-type: none"> • Kent Historic Environment Record, a database of archaeological sites, historic buildings and landscape features in Kent and Medway; • The outputs of the Hoo Peninsula Historic Landscape Project – a major project carried out by Historic England from 2009 – 2012 that examined all aspects of the peninsula's heritage². Historic town survey reports for Chatham, Rochester and Gillingham (2004). These reviewed the known archaeological and built heritage of the three towns and identified Urban Archaeological Zones of sensitivity³; • Kent Farmsteads Guidance (2012) for developers and planners considering development in the countryside; ⁴ • Kent Historic Landscape Characterisation (2001)⁵; and • Kent Gardens Trust survey reports for gardens and green spaces in Medway.⁶
22	Strategic Objectives			<p>KCC supports the strategic objective; "To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway...." (paragraph 2.43). KCC considers that this will help conserve the assets themselves but also ensure that their potential is exploited and that they are enjoyed by local people and visitors.</p> <p>KCC also supports the strategic objective; "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;" (paragraph 2.43) Development is the greatest threat to the historic environment of Medway, but can also draw on heritage assets and the historic landscape to be more effective at delivering the Local Plan's regeneration objectives.</p>

² <https://historicengland.org.uk/research/current/discover-and-understand/rural-heritage/hoo-peninsula/>

³ http://archaeologydataservice.ac.uk/archives/view/kent_eus_2006/

⁴ <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>

⁵ http://archaeologydataservice.ac.uk/archives/view/kent_hlc_2014/

⁶ <http://www.kentgardenstrust.org.uk/research-projects/reports/?projId=8>

APPENDIX 1: KCC response: schedule of technical comments to Medway Council 'Future Medway' consultation

36	Spatial Development Strategy	DS2		<p>KCC requests that 'the historic environment' is added to the first paragraph to ensure consistency throughout the document.</p> <p>KCC has already provided detailed heritage and conservation comments on the various strategic sites mentioned in the KCC response submitted to MC on 30 May 2017 (Appendix 1).</p> <p>In relation to Woo St Werberg, the following points were made:</p> <ul style="list-style-type: none"> • Past archaeological investigations in the area have discovered extensive prehistoric and Romano-British remains in the vicinity of Hoo; • The alignment of a Roman road linking the Hoo Peninsula to Roman Watling Street is projected to run to the south of the former Chattenden Barracks close to the development area; • To the north-west of the area, within the Lodge Hill enclosure, a Romano-British cemetery has previously been identified and a further occupation site has been found south of Hoo between the village and the shoreline; • The village itself contains built heritage assets such as the church and it is important to protect the long views towards them; • There are also Saxon and Medieval remains although the site of the 7th century nunnery has yet to be identified; and • The landscape also contains numerous survivals of the Second World War associated with the GHQ Stop Line that runs from the foreshore south-east of Hoo to the north of Lodge Hill where it turns west. <p>KCC supports the idea of a coastal path that would link key heritage sites. This should tie in with the England Coast Path being developed by Natural England across north Kent. KCC has already supplied appropriate Historic Environment Record information and advice to Natural England to guide the route and identify any needed mitigation or opportunities for interpretation, and would be happy to do so for MC.</p>
	Housing Mix	H2	Does the proposed policy	The continued commitment to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people is welcomed, responding to a growing and changing population

APPENDIX 1: KCC response: schedule of technical comments to Medway Council 'Future Medway' consultation

			for housing mix represent a sound approach? Would you suggest an alternative approach?	(Policy H2). KCC considers that the policy approach sufficiently addresses Medway's aims for developing specialist accommodation through extra care housing and care homes for older people.
97	Natural environment and the greenbelt			<p>KCC recommends that MC should consider and set out the ecological interest of brownfield sites in terms of redevelopment with reference to the case "R. (on the application of Buglife: The Invertebrate Conservation Trust) v Thurrock Thames Gateway Development Corp".</p> <p>KCC also suggested that specific reference is made to species and habitats outside designated areas. There is a need to ensure that ecological surveys and mitigation strategies are submitted with the planning application to ensure that MC can consider the ecological interest of the site when determining the planning application. KCC expects policies to be included, demonstrating that these species populations/habitats will be protected through the implementation of the mitigation hierarchy or if it cannot be mitigated, the planning application should be refused.</p>
102	Conservation and Enhancement of the Natural Environment	NE2	<p>Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment?</p> <p>What alternative approaches would you recommend to</p>	KCC recommends that the Local Plan should clearly set out how designated sites will be protected and connectivity throughout and beyond the Medway area will be created/maintained/enhanced. Developments will need to ensure that they do not result in the isolation of designated areas due to the loss of habitat within the wider area.

APPENDIX 1: KCC response: schedule of technical comments to Medway Council 'Future Medway' consultation

			secure the favourable condition of these areas?	
106	Securing Strong Infrastructure	NE5	<p>Do you consider that this is an effective approach to securing effective and healthy green infrastructure in Medway?</p> <p>What alternative approaches would you recommend to secure effective and healthy green infrastructure in Medway?</p>	<p>With the population of Medway predicted to increase, consideration will need to be given to the potential impacts of this expansion on the Public Rights of Way (PRoW) network in Kent, as growing communities seek outdoor recreation opportunities across the region. Overall therefore, KCC is supportive of the objectives set out in Policy NE5.</p> <p>KCC recommends that the new Medway Local Plan should ensure that future developments are accompanied with high quality outdoor recreational amenities and a good provision of open green space, as this will support healthy and active lifestyles. Development should provide opportunities to enhance existing PRoW routes across Kent and add new links to the PRoW network where possible.</p> <p>KCC would like to draw attention to the County Council's Countryside and Coastal Access Improvement Plan⁷. This plan provides an overarching strategy for managing the PRoW network and improving access to Kent's countryside and coast. The document contains valuable information, which could be useful to meet the ambition for promoting and enhancing the PRoW network.</p>
110	Flood and Water Management	NE7	<p>Do you agree with the proposed policy for flood and water management?</p> <p>Do you have</p>	<p>Sustainable Drainage Schemes (SuDS) may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to both known and unknown heritage asset. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. Archaeological remains in particular are highly vulnerable to changing moisture levels, which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.</p> <p>When SuDS are planned, it is important that the potential impact on the historic environment is fully</p>

⁷ https://www.kent.gov.uk/__data/assets/pdf_file/0016/6172/Countryside-and-coastal-access-improvement-plan.pdf

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			suggestions for alternative approaches for this policy area?	considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record and by taking relevant expert advice. KCC has recently produced advice for SUDS and the historic environment. It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets.
115	Built environment			<p>KCC recommends the incorporation of a policy that requires the production of an Energy Statement for major schemes, to show how development will address energy issues for efficiency and the use of renewable energy sources. This was previously raised in KCC's response to Medway Council Location Plan 2012-2035 Development Options Regulation 18' consultation, submitted to MC on 30 May 2017 (Appendix 1).</p> <p>KCC does not consider it possible to include all heritage aspects under the heading of 'Built Environment'. Medway's heritage includes archaeological remains and the historic landscape, neither of which are part of the built heritage. In future Local Plan documents, KCC considers it would be helpful if the general title of this chapter could be changed to 'Built Environment and Heritage'. Ideally, the historic environment should have a chapter in its own right.</p> <p>As noted above, KCC is pleased to see that Medway intends to set out a strategy for the Historic Environment. The characterisation of the Heritage Asset Review that will underpin the Strategy is not typical (paragraph 8.27). Of the themes listed in the paragraph 'high quality agricultural land' is not a heritage theme and the 'geological makeup of the area' is only partially related to Medway's heritage. Similarly, 'the range of religious and ritual funerary structures' is but one of several archaeological themes of relevance.</p> <p>Medway's heritage has great potential to contribute more effectively to the quality of life in the area than it does at present and may benefit from a Heritage Strategy to ensure that opportunities presented are not missed and that heritage is not harmed by poorly planned or inappropriate development. KCC would suggest that the goals of the Medway strategy should be:</p> <ul style="list-style-type: none"> • To identify and describe the key themes of relevance of the heritage of the district and the heritage assets that represent them;

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				<ul style="list-style-type: none"> • To assess the role that these can play in in regeneration and tourism; • To identify both their vulnerabilities and the opportunities they provide; • To inform site allocations within the district; and • To support policy development. <p>There are now a number of models for Heritage Strategies. The most successful documents not only underpin development control decision-making, but also support the exploitation of the historic environment to bring a range of economic, social, health and educational benefits. KCC would welcome further discussions on this.</p> <p>KCC is also pleased to see that MC will monitor heritage assets at risk, as this is the key first step to helping to conserve and enhance such asserts.</p>
123	Historic Environment (p123) / Policy BE6: managing development in the historic environment	BE5	<p>Do the proposed policies for the historic environment represent the most appropriate approach for the Medway Local Plan?</p> <p>What do you consider would represent a sound alternative approach towards planning for the</p>	<p>Policy BE5 Historic Environment (p123)</p> <p>KCC is supportive of this policy. KCC does however request that the word 'historic' should be replaced with 'heritage', as the clause applies equally to Medway's prehistoric and historic assets and to make the phrase consistent with the rest of the document.</p> <p>At present, the only mention of Locally Listed Buildings is within paragraph 8.29. There is therefore no explanation in the text as to what Local Listing consists of and how MC will use it. KCC recommends that text could be added to the end of paragraph 8.32 that explains how assets will be selected for the Local List, what the value of being on a Local List is, and that heritage assets generally, not just buildings, can be included on a Local List of heritage assets.</p> <p>KCC is commencing work on a project that will in part consider how heritage statements can be made better and more effective. KCC is happy to discuss this further with MC in due course.</p> <p>The most comprehensive resource for information on the heritage assets of Medway is the Kent Historic Environment Record, KCC recommends that this is referred to in paragraph 8.36.</p> <p>Policy BE6: managing development in the historic environment (p124)</p>

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			<p>historic environment in the Medway Local Plan?</p>	<p>The text currently states: "Where a development involves, or has the potential to involve heritage assets with archaeological interest, applicants must submit a desk-based assessment, or where appropriate, a field evaluation". KCC considers that this is somewhat misleading. Not all developments that impact on archaeological remains will need a desk-based assessment - this needs to be ascertained on a case by case basis. KCC recommends that any applicant who believes that their proposed development may impact on archaeological remains, to consult KCC for further guidance. This will not only prevent unnecessary desk-based assessments, but will also help ensure that the desk-based assessments written are effective and contain the right information.</p> <p>KCC considers that draft policies focused on the heritage environment are quite general and high level. Potentially, this may be acceptable, provided that they are underpinned by more detailed explanatory text. KCC would suggest that effective policies need to be drafted that cover the areas as detailed below. These may include specific policies or a general policy for the historic environment that contains a number of expanded clauses. The areas to be covered need to include:</p> <p>Built environment: Conservation Areas</p> <p>Conservation Areas are key to preserving the historic character of Medway's settlements and helping to tie new developments, in both urban and rural contexts, into existing settlements. Central to this process are Conservation Area Appraisals (CAA) and KCC recommends that MC commits to continuing the CAA programme.</p> <p>Built environment: Listed Buildings</p> <p>Medway contains more than 600 listed buildings. These are important markers from the past in the urban and rural landscape and are often central to people's appreciation and understanding of their local character. The Local Plan should contain detail of how these buildings will be conserved such that their significance is retained and where possible enhanced by development.</p> <p>Built environment: Locally listed heritage assets</p> <p>Another important management tool for the historic environment would be a Local List of Heritage assets (not just buildings). The assets likely to be included on a local list will be those of particular</p>
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				<p>importance to local communities as opposed to those on the statutory list which meet national criteria. A local list thus allows a particularly responsive and community-led approach to the conservation of the historic environment.</p> <p>A recent project carried out by MC, KCC and the Kent Gardens Trust is a good example of this. The project involved a community group (Kent Gardens Trust) assisting professionals to review information on key local heritage assets so that they can be included in a local list. The model was extremely successful and would lend itself well to projects aimed at other types of asset.</p> <p>Built environment: Military and coastal heritage</p> <p>The built heritage of Medway has a number of key themes that policies could develop and support.</p> <p>Medway has long been an area of military significance for the UK. Much of this importance is derived from the presence of the historic dockyard and the text suggests that this is appreciated. However, the potential of the defence systems that surround the dockyard are not fully appreciated. In particular, the fortifications of Grain constitute one of the most powerful and varied sets of defence sites in the country. These could play a much greater role in Medway's tourism industry which could be particularly important given the range of challenges faced by that part of Medway.</p> <p>There are additional defence sites along the Medway that could be incorporated into river-based tourism, even if some, such as forts Hoo and Darnet could not be visited. Within the Hoo peninsula, the remnants of the Second World War GHQ Stop Line forms one of the most complete military landscapes of the Second World War in Kent and in conjunction with the nearby military remains at Chattenden could again play an important economic and social role in this growth area. Further to the west, Cliffe Fort and Slough Fort also have an undeveloped tourism potential.</p> <p>The exploitation of the Thames Estuary for industrial purposes has also left a wealth of historic remains that can be seen today in the form of wharves, jetties, hards, landings and structures. These were constructed to serve a range of industries, but the most important of these may have been the gunpowder and explosive industries that flourished in the area, particularly at the Curtis and Harvey Explosives Works at Cliffe. Many of these remains will be clearly visible to people using the coastal path and provide an excellent opportunity for interpretation. Across Medway, there are numerous industrial</p>
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				<p>structures that may not be listed buildings but which nonetheless form key components in the authority's character and which would be suitable for sympathetic re-use rather than wholesale replacement.</p> <p>Townscape</p> <p>Settlements have a historic character that go beyond just Conservation Areas and Listed Buildings. The urban environment as a whole contributes to historic character. Elements in this environment such as streets and street patterns, structures, furniture, surfaces, boundaries, open and green space (squares, urban parks, etc.) help to give settlements a sense of place even when they may not warrant protection as Conservation Areas.</p> <p>Archaeology</p> <p>At present, there is very little consideration of Medway's archaeological heritage in the consultation document. There are more than 1,500 known archaeological assets in Medway. Many of these relate to Scheduled Monuments such as the remains of Roman and Medieval Rochester. Others are undesignated but still significant to local communities such as the Roman temple/mausoleum at Grange Manor or the Saxon to Medieval remains at Hoo St Werburgh. These are inevitably less visible than Medway's built heritage but are no less important in understanding Medway's past and in giving a sense of belonging to new settlements and developments.</p> <p>Landscape: Historic landscape</p> <p>The landscape of Medway is the result of the interaction of natural and human processes over many centuries. Even less developed areas of landscape will contain many historic features such as the patterns of tracks, lanes and hedgerows that give character to the district and marshland has been created by reclamation from the medieval period onwards. The Kent Historic Landscape Characterisation (2001)⁸ has identified the broad historic character of the landscape of Kent. Where it is to be applied locally further study is needed to refine its conclusions, but it remains an essential tool for understanding Medway's landscape. To be fully effective in local planning and development control, the Historic Landscape Characterisation should be backed up by more detailed case-by-case analysis, to</p>
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⁸ https://www.kent.gov.uk/_data/assets/pdf_file/0017/56312/Kent-Historic-Landscape-Character-volume-3.1.pdf

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				<p>add greater detail through secondary sources. The Hoo Peninsula has already been covered by such as assessment and KCC suggests that MC works with KCC to take forward a general Medway study.</p> <p>Landscape: Farmsteads</p> <p>Like much of Kent, Medway has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. English Heritage has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside. The Kent Farmsteads Guidance⁹ has been endorsed by the KCC and it is recommended that MC considers adopting the guidance as a Supplementary Planning Document, as part of the Local Plan process.</p>
133	Infrastructure		Does the proposed policy for Infrastructure planning and delivery represent the most appropriate approach to planning for infrastructure improvements in Medway?	<p>The commitment to engage constructively on strategic planning matters in order to ensure that development is supported by the provision of on and off site infrastructure, services and facilities is welcomed. The timing of infrastructure provision will depend on the housing trajectory and pace of development and KCC welcomes continued liaison on all cross-boundary infrastructure pressures relating to the County Council's own service provision across Kent.</p>
	Communications Technology	14	Does the proposed policy for	<p>KCC welcomes MC's commitment to communications technology to ensure the provision of superfast broadband and telecommunications infrastructure coverage across Medway.</p>

⁹ <https://shareweb.kent.gov.uk/Documents/community-and-living/Regeneration/Kent%20Downs%20AONB%20Farmsteads%20Guidance.pdf>

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			Communication s represent the most appropriate approach for the Local Plan?	
147	Transport		Do you agree that this approach offers an appropriate strategic approach to transport planning in Medway?	<p>KCC's comments relating to Highways and Transportation remain as set out in KCC's response to Medway's previous consultation (Appendix 1). These comments are summarised as follows:</p> <ul style="list-style-type: none"> • Key development sites will generate additional trips impacting routes outside Medway. These sites include Rochester Airport, Cliffe, Cuxton, Halling, Captstone and at Rainham; • Growth in Medway is likely to result in an increase in traffic, potentially impacting routes through Gravesham, Tonbridge and Malling, Maidstone and Swale; and • The impact of the additional journeys on the strategic highways network will need to be quantified, including the impact of rat running traffic and localised congestion. <p>KCC would welcome continued engagement, alongside relevant transport providers, as MC plans for strategic road network and railway improvements and would ask that Medway liaises with KCC to ensure that that traffic modelling covers the key corridors and junctions that have been identified and are compatible with outputs from transport models which have been developed or are under construction by KCC – in particular that for Maidstone and the Malling/Aylesford Model. The model outputs will be key to informing the County Council's view of the resulting transport impacts.</p> <p>With reference to Section 35 of the National Planning Policy Framework (NPPF), there should be an aspiration to develop sustainable transport opportunities within new developments. It should be noted that within the new Local Plan, the PRoW Network can make a valuable contribution to this sustainable vision, by providing infrastructure links for active travel.</p> <p>KCC is supportive of Policy T1. Establishing an integrated network of high quality walking and cycling routes between local amenities would encourage active travel and provide low carbon transport alternatives to short distance car journeys. This would help to improve the health and well-being of</p>

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				<p>residents, reduce traffic congestion and address air quality issues</p> <p>Consideration should be given to the proposed new category of road following the Government's consultation on a Major Road Network (MRN) which would enable access to a new source of funding from the National Road Fund post 2021</p>
171	Minerals, waste and energy	MWE 1	Do the proposed policies MWE1-MWE5 represent the most sustainable approach to managing the sustainable and steady supply of minerals in Medway?	<p>KCC, as the Minerals and Waste Planning Authority for Kent, considers that the Sustainability Appraisal framework objectives used to test the sustainability of the policies and development strategy scenarios that make up the emerging Local Plan are appropriate for testing the Development Strategy. KCC further considers that the sustainability objective scoring for the following policies are appropriate:</p> <ul style="list-style-type: none"> • Mineral Supply – MWE1, MWE2, MWE3; • Wharves and Railheads – MWE 4; • Mineral Infrastructure – MWE 5; • Waste Management – MWE 6; • New Waste Management Facilities – MWE 7; • Existing Waste Management Facilities – MWE 8; and • Waste Disposal to Lane – MWE 9. <p>The safeguarding approach set out in the NPPF, to ensure that mineral resources are not needlessly sterilised by other forms of development and to ensure that a steady and adequate supply of minerals is maintained into the future to facilitate sustainable development, is supported in the NPPF and within the adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP)¹⁰.</p> <p>The mineral importation facilities within Medway, particularly the wharves and associated railhead, play a fundamental role in wider mineral planning objectives and supply to underpin sustainable development within Kent and Medway. KCC would like to see the emerging Local Plan recognise this and ensure that those facilities are appropriately safeguarded.</p> <p>The NPPF requires that development should not be permitted within defined mineral safeguarding areas where they might constrain potential future use of the economic mineral resource. As such, the policies of Medway's Local Plan should aim to prevent the sterilisation of an area's potentially economic mineral</p>

¹⁰ <http://consult.kent.gov.uk/file/4073744>

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				<p>assets. The Development Strategy identifies Areas of Search of aggregate minerals (sand and gravel) that originate from the Kent Minerals Local Plan Construction Aggregates Written Statement adopted in December 1993, which predates the establishment of the Medway Unitary Authority. This is a sound approach to identifying the areas within Medway, where potentially currently economic mineral resources may exist free from significant constraints.</p> <p>However, it does not enable the comprehensive safeguarding of all potentially economically important minerals that exist in the area. The economics of minerals change through time and future generations may require minerals that are currently lacking in obvious demand. Therefore, it is considered that the document should define Mineral Safeguarding Areas (MSA), as required by the NPPF paragraph 143, and adopt policies to safeguard the mineral resources identified within the MSA. Information is produced by the British Geological Survey (BGS), which has defined the UK's economic geology. The appended advice note from the BGS sets out how the safeguarding process works (Appendix 2). Medway's generally accepted total range of minerals that have economic potential is also available from the BGS.</p> <p>The minerals that the BGS defined as potentially economic are not necessarily economic when further investigated - this is part of a precautionary approach that enables non-mineral development to come forward, subject to meeting exemption criteria of the local plan's safeguarding policy. Policy should recognise that the aim of safeguarding is to avoid unnecessary sterilisation of potential resources and encourage prior extraction of the mineral where practicable and viable before non-mineral development occurs.</p> <p>A Minerals Assessment should be prepared to accompany such applications to enable a determination if prior extraction is indeed required or that the presumption to safeguard can be set aside given that the submitted Minerals Assessment demonstrates that an exemption criterion of the mineral resources safeguarding policy can be invoked. An example of such a policy reflects the approach taken by KCC:</p> <p>Planning permission will only be granted for non-mineral development that is incompatible with minerals safeguarding where it is demonstrated that either:</p> <ol style="list-style-type: none"> 1. the mineral is not of economic value or does not exist; or 2. that extraction of the mineral would not be viable or practicable; or 3. the mineral can be extracted satisfactorily, having regard to the need to demonstrate no
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				<p>unacceptable adverse impacts to the environment or communities and is for a temporary period, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development; or</p> <ol style="list-style-type: none"> 4. the incompatible development is of a temporary nature that can be completed and the site returned to a condition that does not prevent mineral extraction within the timescale that the mineral is likely to be needed; or 5. material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction; or 6. it constitutes development that is exempt from mineral safeguarding policy, namely householder applications, infill development of a minor nature in existing built up areas, advertisement applications, reserved matters applications, minor extensions and changes of use of buildings, minor works, non-material amendments to current planning permissions; or 7. It constitutes development on a site allocated in the adopted development plan where consideration of the above factors (1-6) concluded that mineral resources will not be needlessly sterilised.
172	<p>Land-won extraction of sands and gravels</p> <p>Land-won minerals: chalk and clay</p>	<p>MWE 2</p> <p>MWE 3</p>		<p>KCC considers the landwon mineral supply policies (Policy MWE2/ MWE3) to be appropriate to ensure mineral developments can come forward to meet identified needs, although the criteria tests should have 'and' after each criterion point to clarify that all have to be met.</p>
175	Minerals wharves and railheads	MWE 4		<p>This safeguarding policy reflects an important policy provision in that the NPPF that requires all permitted existing, planned and potential mineral wharves and railheads to be safeguarded. However, the criteria tests should have 'or' after each criterion point to clarify that only one has to be met to invoke the exemption from the presumption to safeguard. Also, the first criterion could potentially be more appropriately expressed as:</p>

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				<p>'It constitutes development on the site that has been allocated in the adopted development plan where consideration of the following criteria (2, 3 and 4) can be demonstrated to have taken place in formulation of the plan and allocation of the site which concluded that the safeguarding of minerals management, transportation and production facilities has been fully considered and it was concluded that certain types non-mineral development in those locations would be acceptable.'</p> <p>Where direct loss of a wharf or railhead is potentially threatened, replacement capacity will be required to maintain mineral supply. The following wording may be appropriate to address this concern, either as another criterion of Policy MWE4 or as a separate standalone policy:</p> <p>'The replacement wharf and railhead capacity must be at least equivalent in terms of tonnage, accessibility, location in relation to the market, suitability, availability of land for processing and stockpiling of minerals, and in the case of wharves including the size of the berth for dredgers, barges or ships.'</p>
176	Minerals infrastructure	MWE 5		<p>KCC agrees that this policy should ensure concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material in Medway will be safeguarded as required by the NPPF. Again, the criteria tests should have 'or' after each criterion point to clarify that only one has to be met to invoke the exemption from the presumption to safeguard. Also, the first criterion could potentially be more appropriately expressed as:</p> <p>'It constitutes development on the site that has been allocated in the adopted development plan where consideration of the following criteria (2, 3 and 4) can be demonstrated to have taken place in formulation of the plan and allocation of the site which concluded that the safeguarding of minerals based products and production facilities has been fully considered and it was concluded that certain types non-mineral development in those locations would be acceptable.'</p> <p>Moreover, KCC considers it may be appropriate to include another element to Policy MWE4 and Policy MWE5 (or a separate new standalone policy) to ensure that the safeguarding of the facilities is not compromised by inappropriately cited of non-minerals development (e.g. residential development) that may result in future lawful operation of the facilities curtailed by environmental impacts legislation actions. The following form of wording may be important to ensure inappropriate development is not</p>

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				<p>cited proximate to the safeguarded facilities:</p> <p>'Development proposals within 250m of safeguarded mineral (and/or any associated mineral products facility) facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.'</p>
177	Waste Management New Waste Management Facilities	MWE 6MW E7	Do the proposed policies MWE6-MWE10 represent the most sustainable approach to managing Medway's waste?	<p>The need to minimise the growth of waste and the strive to maintain net self-sufficiency across each of the waste streams through permitting facilities for the reuse, recycling, treatment and transfer of waste materials, subject to their being of an appropriate environmental standard in Medway, is supported by KCC. These objectives are in accordance with the governments' National Planning Policy for Waste (October 2014).</p>
179	Existing Waste Management Facilities	MWE 8		<p>Safeguarding of the existing waste management capacity is supported by the County Council, as this underpins the area's ability to strive towards net self-sufficiency. KCC recognises that Policy MWE8 supports this, although the use of 'or' after each criterion would make clarify that only one criterion needs to be met to invoke the exemption from the need to safeguard the facility. The first criterion of the policy might be strengthened by being expressed as follows:</p> <p>'it constitutes development on the site that has been allocated in the adopted development plan where consideration of the following criteria (2 to 4) can be demonstrated to have taken place in formulation of the plan and allocation of the site which concluded that the safeguarding of waste management facilities has been fully considered and it was concluded that certain types non-waste development in those locations would be acceptable.'</p> <p>The last criterion could also be reworded to strengthen the safeguarding provision with the following:</p> <p>'The replacement capacity must be at least equivalent in terms of tonnage, accessibility, location in relation to the market, suitability, availability of land for processing and stockpiling of waste, and the</p>

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				<p>replacement capacity must be at least at an equivalent level of the waste hierarchy and capacity may be less if the development is at a higher level of the defined waste hierarchy.'</p> <p>As with the mineral facilities safeguarding, inappropriate or incompatible development (e.g. residential housing) should not be sited proximate to safeguarded waste facilities that would have the potential to disrupt and compromise their continued lawful operations. Either a further criterion for Policy MWE8 or a standalone policy should address this with the following type of wording:</p> <p>'Development proposals within 250m of safeguarded waste facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.'</p>
179	Waste disposal to land	MWE 9		<p>In order for net self-sufficiency to be realistically achieved, final disposal capacity is a requirement in an area such as Medway. It is understood that the area of the Hoo Peninsular has a suitable geology for non-inert and potentially hazardous waste disposal on the London Clay. There are no voids that could be restored by landfilling operations and thus any disposal to land would invariably involve a degree of land re-contouring. Policy MWE9 does provide a comprehensive set of criteria to be satisfied before such a development could be acceptable in principle. However, KCC considers that after each criterion use of 'and' would reinforce the fact that each criterion needs to be addressed. Moreover, the restrictive criterion states:</p> <p>'Unless a specific needs case can be demonstrated, that wastes to be deposited do not involve a road haulage distance of more than 50 miles'.</p> <p>KCC considers that this may not be appropriate in that the principle of net self-sufficiency recognises that certain waste materials, particularly certain hazardous wastes, have very different economics of treatment and disposal than others. This means arbitrary distance limitations being imposed by a policy in a Local Plan may not be one that is based on evidential justification on what is proximate for all waste (hazardous) types, and thus may not be sound. It would also be useful to understand the rationale and evidence for selecting 50 miles.</p>
	Waste Water Treatment	MWE 10		<p>Policy MWE10 is considered by KCC as an appropriate policy to address Medway's waste water treatment capacity requirements into the future; possibly a reference to 'no detrimental impact on the</p>

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	Works			<p>local highways capacity' may also strengthen the policy.</p> <p>KCC notes that there are approximately ten sites on the Hoo Peninsula that are identified as Areas of Search (page 173). It is not clear whether these already have permissions attached or where this figure sits in the normal process of consultation, assessment and allocation that accompanies minerals planning. Within the timeframe of this consultation, it is not possible to carry out a full site by site assessment without further information and more time, but it should be noted that many of these are archaeologically significant and any allocation as mineral extraction sites should only follow full assessment and, if needs be, archaeological fieldwork. KCC requests that MC consults with KCC on this matter.</p>
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PDX/WE

email: [REDACTED]

25 June 2018

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

[REDACTED]
[REDACTED]
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Dear Sir or Madam,

**MEDWAY COUNCIL LOCAL PLAN DEVELOPMENT STRATEGY CONSULTATION (MARCH 2018 – REPRESENTATIONS
ELM COURT BUSINESS PARK**

On behalf of our client, First Alliance, we write to submit representations to Medway Council in respect of the Local Plan Development Strategy Consultation (March 2018). First Alliance have an agreed contractual position with the current owners of Elm Court Business Park to take forward the development potential of the site.

Elm Park Business Park extends to an area of 37.4 ha of which 14.2ha comprises the existing business park. The remaining 23.2ha comprises undeveloped land. The full extent of the land interest can be seen on the Plan at Appendix A.

Context for Representations

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

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

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

Background and Current Policy Position

Within the adopted Medway Local Plan Elm Court has its own site specific policy. Whilst recognising its existing employment offer Policy ED4 prevents intensification of employment uses other than through minor alterations and extensions to the existing buildings or replacement of an existing building. The rationale for this is that it is surrounded by an attractive tract of countryside.

This position has been materially altered through the grant of planning permission for Gibraltar Farm. It has been discussed and agreed with both officers and members that this permission will change the landscape character of the area and as such it is appropriate to consider how as an existing employment site its potential can be optimised.

We consider that there are two main development opportunities. Firstly to optimise the employment function of the site through intensification of development on land marked Area A on the attached plan.

Such development could make a significant contribution to addressing the acknowledged quality employment land in locations and formats that businesses need. The existing employment offer on the site demonstrates the high demand for provision of this type of facility in this area. Delivery of new modern space in this location will therefore make a significant contribution to Medway's overall employment needs.

Secondly we consider there is development potential on the remaining landscaped area. We are currently evaluating a variety of development options for this with specific focus on the provision of some senior living accommodation possibly through delivery of a retirement village with associated social infrastructure including medical facilities. Such provision would respond directly to the following:

"Medway is projected to see an increase of 31,000 residents aged over 65 by 2035. With this population change, planning for the needs of older people is a key consideration for the Local Plan."

"Access to healthcare is one of the greatest concerns raised by local people in consultation on the emerging Local Plan. Residents already experience difficulties in registering with GPs, and getting appointments at local surgeries and the hospital. People fear that these services will be placed yet further strain with the increased population projected for the area. The council's work on infrastructure planning, as part of the evidence base for the new Local Plan, has identified several issues of capacity."

Proposed Elm Court Allocation

We consider that the new Local Plan affords opportunity of promoting a new site allocation that looks to address the opportunities afforded by the site and in particular the different characteristic of the area as a result of the Gibraltar farm planning permission whilst helping the Council meet its identified needs including both delivery of greater and wider employment provision, senior living needs and healthcare provision.

The specifics of any such allocation do of course need to be tested further in order to ensure that any such allocation can ultimately be found sound.

Preliminary technical work has been undertaken in terms of some important matters including site accessibility and opportunities form sustainable travel and landscape impact.

Conclusions

In summary, we consider opportunity should be taken by the new Local Plan Development Strategy to address the out-of-date site allocation for Elm Court in order to better recognise its development potential and contribution it can make towards meeting Medway's development needs

We strongly recommend that a revised allocation for Elm Court be developed and included within the Local Plan. We would be delighted to continue our ongoing dialogue with both officers and Members to inform the precise wording of such policy/site specific allocation.

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

Yours Faithfully



MONTAGU EVANS LLP



Total site area (red + blue line) = 37.4 acres
Built area (blue line) = 14.2 acres
Undeveloped area (exc blue line) = 23.2 acres

REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN 2012-2035 - DEVELOPMENT STRATEGY REGULATION 18 CONSULTATION REPORT

On behalf of AC Goatham & Son

25 June 2018

1. INTRODUCTION

1.1 These representations have been made on behalf of AC Goatham & Son who is the promotor of Pump Farm and Bloors Farm, both accessed from Pump Lane in Lower Rainham. These sites are shown on the accompanying site location plan, and identified in the Strategic Land Availability Assessment ('SLAA') 2017 under reference numbers 1061 and 750, respectively.

1.2 These sites were formerly promoted for housing development through the representations of Begur limited to the previous Development Options Regulation 18 consultation in April 2017. AC Goatham & Son remains firmly committed to the promotion of the sites for housing development through the Local Plan process. These representations are made in this context and demonstrate a clear justification for designating these sites as a sustainable urban extension to meaningfully contribute to the Council's substantial housing requirements within the district.

2. PUMP FARM AND BLOORS FARM

SLAA ASSESSMENT

2.1 Pump and Bloor Farms are identified in the SLAA January 2017, as being unsuitable. This however imports no individual site or wider assessment. Nor is any explanation provided. The SLAA November 2015 was accompanied by Site Assessments for both sites. They were identified as having a development potential to provide 609 and 656 residential units, respectively. An overall conclusion considered both sites unsuitable for development unless identified constraints can be addressed. The constraints that were here identified as unresolvable, are as follows:

Pump Farm (SLAA Ref: 1061)

- Landscape: due to the site being situated outside of the built up area, with an Area of Locally Valued Landscape of the Lower Farmland, which is considered to be sensitive to change and views from across the River are particularly sensitive. Development was therefore identified as being likely to have a detrimental impact upon locally valued landscapes.
- Agricultural land: as the site is situated on the best and most versatile agricultural land.

Bloors Farm (SLAA Ref: 750)

- Agricultural land, as the site is situation on the best and most versatile agricultural land.

2.2 On all other assessment criteria, the sites' constraints were identified as either "unconstrained" or "anticipated that constraints can be resolved". In respect of the above identified constraints further evidence will be provided by AC Goatham & Son through the Local Plan and planning application processes to demonstrate that the sites are deliverable.

AGRICULTURAL LAND

2.3 AC Goatham & Son (one of the major fruit growers in the UK), on behalf of the two relevant landowners, confirm that these sites will become surplus to core requirement as orchards and will become available for redevelopment during the currency of the Local Plan process. This coincides with a discernible trend of considered future reinvestment by AC Goatham & Son in other, comparatively preferential, sites located nearer to its hub farm operations. More generally, operational requirements will continue to be consolidated for the future, and, as an integral part of this, the subject two sites are not - with regard to such preferentially located, agricultural and benefit-yielding sites - comparatively suitable to be retained as orchards, moving forwards.

2.4 This is owed not least to:

- The sites are located in close proximity to existing residential areas: the operation as orchards has attracted residential complaints over the years, which indicates that increased commercial fruit production and distribution from these sites may give rise to concerns at least amongst neighbouring residential areas, where it is anticipated that such concerns would not be expressed in respect of other sites located nearer to hub farm operations;
- Optimised future reinvestment opportunities: A future requirement for investment in replanting at the sites would inevitably prove substantially less efficient than reinvesting elsewhere, and in a way that coincides with the drive for consolidating and optimising the use of better and preferentially located sites that are nearer to the hub farm operations. It has been identified that such sites will provide for conspicuously better economic and agricultural benefits, in overall terms, when compared with the same level of reinvestment in the two sites. As such, what stands as clear economic and agricultural betterment to be derived from these other sites is now being pursued in alternative preference to the sites.

2.5 Thus, the two sites are not deemed suitable. The landowners are therefore releasing these sites during the Local Plan process from their business portfolio of operational orchards. Notwithstanding the sites' agricultural land status, upon careful assessment of their comparative economic and agricultural benefits and disbenefits (that flow in part from the consolidation of operations more locally to hub farm operations), the need for these sites to remain as agricultural land has been confirmed as having diminished significantly as to effectively extinguish what was formerly identified need. For the purposes of confirming land availability, as set out below, the sites are available now.

2.6 These sites will in turn represent a significant development opportunity, as these are sustainable housing development sites that are deliverable, and should be identified in the Local Plan as Rainham's urban extension. The sites' deliverability is demonstrated in the following section.

LANDSCAPE CONSIDERATIONS

2.7 The sites are designated as an Area of Locally Valued Landscape, which is identified as being a constraint which cannot be resolved, in respect of Pump Farm. This is a general statement without a site specific assessment. It is our view that there will be no unacceptable impact on the landscape value, for which we will provide robust evidence through the Local Plan and planning application processes.

2.8 The Council's Medway Landscape Character Assessment (2011) ('MLCA') identifies this area as an urban fringe with urban/industrial influences. Issues identified include: the value of the area as a green corridor linking communities in urban areas to the countryside and a role as an extended buffer to the County Park and Natural 2000/Ramsar protected coastlines; and a threat of expansion to urban edges on south and west sides along with gradual, pervasive erosion of rural character. However, the landscape "condition" and "sensitivity" are identified as "moderate," and development of the sites with a comprehensive and sensitive masterplan approach to incorporate appropriate landscaping will appropriately manage and address sensitive views to be defined.

2.9 It should also be noted that the sites are currently private land with no public access into or through the land. Development of this site will provide appropriate access to the area linking the existing community of Rainham to the County Park. Without regeneration of these sites through ongoing reinvestment, which cannot economically be sustained in light of the consolidation drive outlined above, the existing orchards will deteriorate which will inevitably harm the landscape value of this area.

THE SITES' DELIVERABILITY

2.10 The National Planning Policy Framework ('NPPF') requires that in order to boost significantly the supply of housing, local planning authorities ('LPAs') should identify and update a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of housing in order to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. "Deliverable" housing

sites are defined as those available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years, in particular that the site is viable. The LPAs are also required to identify specific “developable sites” or broad locations for growth for years 6-10. “Developable” sites are identified as those in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged, as demonstrated below.

Availability

2.11 As explained above, the landowners’ operational requirements for the sites as commercial orchards have been identified as having effectively extinguished. There is also no prospect of the sites being re-used for this purpose. AC Goatham & Son confirm, as freeholder, that the sites are available for redevelopment now subject to the granting of necessary planning permission. The sites are, therefore, available for development now, and have the potential to deliver around 1,250 units in total, as identified in the SLAA 2015.

Suitability for Residential Development

2.12 The sites adjoin the existing residential areas of Rainham which is served by good public transport services and a wide range of services/facilities. There are no constraints that could not be overcome to facilitate residential development. An intensification of commercial orchard operations on the sites will be comparatively less suitable in residential amenity terms, than their residential development. The sites are suitable for housing development, as a highly sustainable and logical urban extension to the settlement of Rainham.

Achievability

2.13 AC Goatham & Son are actively promoting the sites for housing development. Subject to the grant of necessary planning permission, the sites are realistically capable of delivering housing development in the first phase of the Plan period. Development viability will be assessed taking into account the affordable housing requirements, other obligations and market conditions at the time when development proposals are promoted through the planning application process. At this stage, there is no indication to suggest that there will be any viability issues for housing development.

Summary

2.14 The sites are a highly sustainable urban extension to Rainham, and they are deliverable housing sites as being available, suitable and achievable. It is therefore requested that the sites are designated as an urban extension to Rainham with a potential housing capacity of around 1,250 units.

3. THE DEVELOPMENT STRATEGY AND SCENARIOS

3.1 The consultation document sets out four development scenarios focusing on the distribution of housing land to meet Medway’s housing needs. It is understood that these have taken into account how the Council might accommodate a higher level of housing needs in light of the Government’s proposed approach to the standardised method of calculating the housing needs. In this regard, Scenarios 1, 2 and 4 seek to meet the Objectively Assessed Housing Need (29,463 units) based on the Strategic Housing and Economic Needs Assessment with Scenario 3 seeking to meet the higher need (37,143 units) based on the Government’s Standard Method.

3.2 All four scenarios seek to meet the identified housing needs based on the following sources:

- Pipeline sites (completions and permissions);
- Potential allocation capacity on identified sites (as identified as “Potential Site Allocation” for each Scenarios, with all scenarios including the potential development of the Hoo Peninsula, and the “Opportunity Areas” around Strood, Chatham and Gillingham); and
- Windfall allowance over 17 years.

3.3 Scenarios 1 and 2 follow the same development strategy focusing on urban regenerations, brownfield sites, the Opportunity Areas and potential allocations including the Hoo Peninsula. Scenario 2 seeks to bring forward development at the Hoo Peninsula at a faster rate and achieve a greater capacity on some areas, based on the potential introduction of a new passenger rail service and stations.

3.4 Scenario 3 seeks to meet the higher housing need by relying on the development of the urban Opportunity Areas and achieving high densities on appropriate sites.

3.5 Scenario 4 is the only exception out of the four scenarios which involves development at Lodge Hill, which involves elements of development on land designated as a SSSI.

3.6 None of the options will meet the need identified based on the Government's Standard Method. In response to **Question DS1 on Policy DS2 (Spatial Development Strategy)** we do not consider that the Development Strategy based on the four scenarios are the most appropriate sustainable approach and are demonstrated to deliver the housing requirements based on the Objectively Assessed Housing Need or the Government's Standard Methods. Our concerns are expressed below relative to each component/source of the housing land supply identified in the development scenarios.

RELiance ON BROWNFIELD URBAN SITES/OPPORTUNITIY AREAS AROUND TOWN CENTRES

3.7 We note that the consultation document identifies development on urban brownfield sites through regeneration as forming a significant component of the development strategy. In particular, it relies on a number of potential sites and wider "Opportunity Areas" around Strood, Chatham and Gillingham. It is not clear how the potential capacity has been identified. The Council also recognises that not all sites are currently available. Whilst regeneration of brownfield sites and urban areas are the most sustainable form of development to increase housing, it cannot be relied upon as a significant component of the development strategy without the potential sites' deliverability being robustly demonstrated, particularly the availability and development viability. This is particularly the case of urban brownfield sites, which are often constrained by a number of factors, affecting development viability and the time taken to deliver each sites.

THE HOO PENINSULA GROWTH STRATEGY

3.8 The development of the Hoo Peninsula is identified as a core component of the Development Strategy. The identified potential allocations are made up of a number of strategic landholdings, requiring a Masterplan-led approach to ensure a sustainable rural town and its countryside setting and to bring forward significant public transport upgrades. The consultation document identifies that the scale of growth envisaged to make a significant contribution to housing supply is dependent upon significant upgrades in infrastructure. Furthermore, the greatest care and attention needs to be given to sensitively planned growth to respect the countryside setting and links to the wider estuary with the Hoo Peninsula having a distinctively different character to urban Medway.

3.9 There are a number of environmental designations including the international and national significance of the Hoo Peninsula's habitats and landscapes. Therefore, there are a number of environmental constraints and sensitivities, which would need to be protected and ensure that the growth of the Peninsula achieves a rural character.

3.10 We fundamentally question whether the Hoo Peninsula is the most sustainable location for growth, bearing in mind that there are a number of environmental constraints and it has a distinct rural character, where there is a highly sustainable urban extension site (namely the Pump and Bloor Farms) which has been discounted from the development strategy/allocation, despite the sites being adjacent to the urban area of Rainham with no significant constraint or internationally or nationally recognised environmental protection.

RURAL AND URBAN EXTENSIONS

3.11 We note that the Development Strategy includes a number of extensions to the rural towns and urban areas. These include potential site allocations around East Hill and the eastern side of Rainham both of which are identified as Areas of Landscape Importance and extensions to small settlements such as High Halstow, Lower Stoke

and Allhallows, which are in remote rural locations to further north of the Hoo Peninsula with some lands identified as the best and versatile agricultural land.

3.12 As demonstrated in Section 2 of this submission. Pump and Bloors Farms are a highly sustainable urban extension site, with the agricultural land deemed unsuitable and unviable as commercial orchards and a moderate local landscape value which could be overcome by a sensitively designed scheme. There is no evident justification or indeed evidence for these other sites which are considered to be far less sustainable as growth options having been selected or are currently designated as Areas of Local Landscape Importance being selected while Pump and Bloor Farms are not considered as a potential allocation to meet the pressing housing requirements.

RELiance ON WINDFALL SITES

3.13 The consultation document identifies windfall developments as a source of land supply. The windfall allowance identified in all four scenarios are made up of sources including sites coming forward in opportunity areas for redevelopment, residential units above retail and commercial properties, conversion of commercial premises to residential under Prior Approval, renewal and intensification of older residential estates and small sites under 5 units. It states that all these sources represent significant opportunities and therefore provide a realistic basis from which to consider a land supply of 3,332 dwellings from windfall sources. This allowance is made for over the 17 year period. We consider the delivery of some of the sources identified may never be realised, for example, the Council acknowledges that some sites identified within the opportunity areas are not currently available and renewal and intensification of older residential estates could take a considerable time to be delivered. Given the Borough's very significant under delivery of housing supply, the Local Plan should not rely heavily on windfall sites coming forward to the extent being identified by the Council. The Local Plan should instead identify sustainable strategic sites, such as the Pump and Bloor Farms, to ensure that there is a realistic source of housing supply in the short to mid term to meet the identified housing need, particularly if the Council were to meet the higher housing needs (Scenario 4).

LODGE HILL DEVELOPMENT

3.14 Scenario 4 relies on the delivery of potential development at Lodge Hill for a new settlement on Hoo Peninsula. The consultation document notes that a new development proposal is being considered by the national regeneration agency which is significantly reduced in scale from the previous proposal withdrawn at appeal, with a new strategy for nature conservation on the site. That said, however, the revised strategy to deliver development on Lodge Hill does involve elements of development on land designated as a SSSI which is afforded the highest level of protection from development by the NPPF. The LPAs are directed by the NPPF to avoid development likely to have an adverse effect on a SSSI, with the only exception being that the benefits of the development clearly outweigh the impacts. It is noted that the Council included this potential scenario so that a transparent and objective assessment of the impacts arising from potential impact can be made as part of the consultation process.

3.15 On this point, we reiterate that Pump and Bloors Farms do not have any international or national designations and are demonstrated to be a highly sustainable urban extension site, with a potential capacity of around 1,250. The Development Strategy should focus first on sustainable deliverable sites with no international or national designations such as our site.

SUMMARY

3.16 As demonstrated above, we do not consider that the Development Strategy based on the four scenarios which rely on the identified potential sources of housing supply is robust in order to meet the identified housing need. We consider that a highly sustainable urban extension site such as Pump and Bloor Farms should be allocated for housing development as a deliverable site to contribute to Medway's housing supply.

3.17 We are supportive of the housing delivery policy (H1) which seeks to provide a supply of land to meet the housing needs and meets the principles of sustainable development by allocation of sites and broad locations for development which will be established in the Local Plan to ensure a supply over the plan period. In line with Policy H1, Pump and Bloor Farms should be allocated for housing development.

4. DEVELOPMENT MANAGEMENT POLICIES

4.1 This section makes comments on development management policies:

POLICY H3 - AFFORDABLE HOUSING

4.2 The policy sets 30% and 25% affordable housing requirements, for rural Medway and urban Medway respectively. However, rural and urban areas are not defined for this purpose. In this regard, the North Kent Strategic Housing Market Assessment 2015 (SHMA) identifies specific rural wards to which the higher target of 30% would be applied. In order to provide clarity in the policy itself, we consider that rural and urban wards are identified in the supporting text for the policy.

4.3 The NPPF is clear that viability consideration is a key to facilitate development to be deliverable. The NPPF also recognises that affordable housing policies should be sufficiently flexible to take account of changing market conditions over time. As such, the policy should be amended to include viability considerations to be taken into account in assessing the provision of affordable housing at the planning application stage.

POLICY H9 - SELF-BUILD AND CUSTOM HOUSEBUILDING

4.4 We do not object to the principle of policy promoting self-build or custom home development. However, **Question H17** seeks views on a suggestion to set a threshold of development of 400 units or over to make at least 5% of the plots available to self/custom builders to purchase. This aspiration should be evidence based and should only be sought subject to development viability, taking into account the affordable housing requirement.

4.5 **Question 18** provides a prescriptive period of 12 months of marketing of self/custom plots before they are offered to the Council/Housing Association to purchase. Only after the Council or the housing association do not wish to purchase the plot, then it will be returned to the developer to build/or sold on the open market. We are concerned that this approach will delay the delivery of residential units, and as such, the marketing period should be reduced to 6 months.

4.6 **Question 19** places the onus on the developer to advise the Council when each plot has been sold in order to monitor the development. This is on the back of the Council's intention to ensure that the plot purchased by a self/custom builder is built within 3 years of the date of sale, before being offered to other applicants on the self build register to purchase. We consider that this approach introduces a complexity and could potentially result in housing plots undelivered. As such, we consider that the plot should be returned to the developer to build and/or sold on the open market in order to ensure that residential units are constructed in a timely manner.

POLICY E2 - RURAL ECONOMY

4.7 The policy seeks to direct development to land of lesser agricultural land, where feasible, and promotes the sustainable development. As demonstrated in Section 2 of these representations, regardless of Grades identified for agricultural land, there are integral factors that make existing agricultural land unsuitable to be used as agricultural land in the future. This includes the unsuitability of land assessed with regard to the distinct, comparative economic and agricultural benefits and disbenefits of sites that in turn will require cross-assessment of the two sites with other preferentially located and yielding sites. This assessment has been undertaken with regard to the two sites and all other relevant agricultural sites.

4.8 Consistently with the outcome of this assessment, the two sites should be considered for release to alternative uses such as residential development so that they can contribute to Medway's development needs. This, in turn, will assist in protecting and enhancing the best and most versatile agricultural lands which are suitable for continued agricultural uses.

POLICY NE4 - LANDSCAPE

4.9 We note that the Council will be updating its evidence base to provide a basis for determining the accessibility of development proposals and areas that need to be protected and enhanced. We reserve our right to comment on the policy once further evidence is published.

POLICY BE1 - PROMOTING HIGH QUALITY DEVELOPMENT

4.10 We object to the policy criterion which seeks development proposals to achieve a transition from urban to rural, where appropriate. We consider that this policy is too vague and not clearly justified.

4.11 We request that the criterion which seeks a BREEAM standard of “Very Good” is specifically related to commercial floorspace of over 1,000sq.m, so that this would not be applied to residential or small-scale developments.

POLICY BE3 - HOUSING DESIGN

4.12 We object to the policy criterion requiring “compliance” to meet the Medway Housing Design Standard for external spaces, as the document does not form part of the Development Plan, and should be used as a guide only.

POLICY HC1 - PROMOTING HEALTH AND WELLBEING

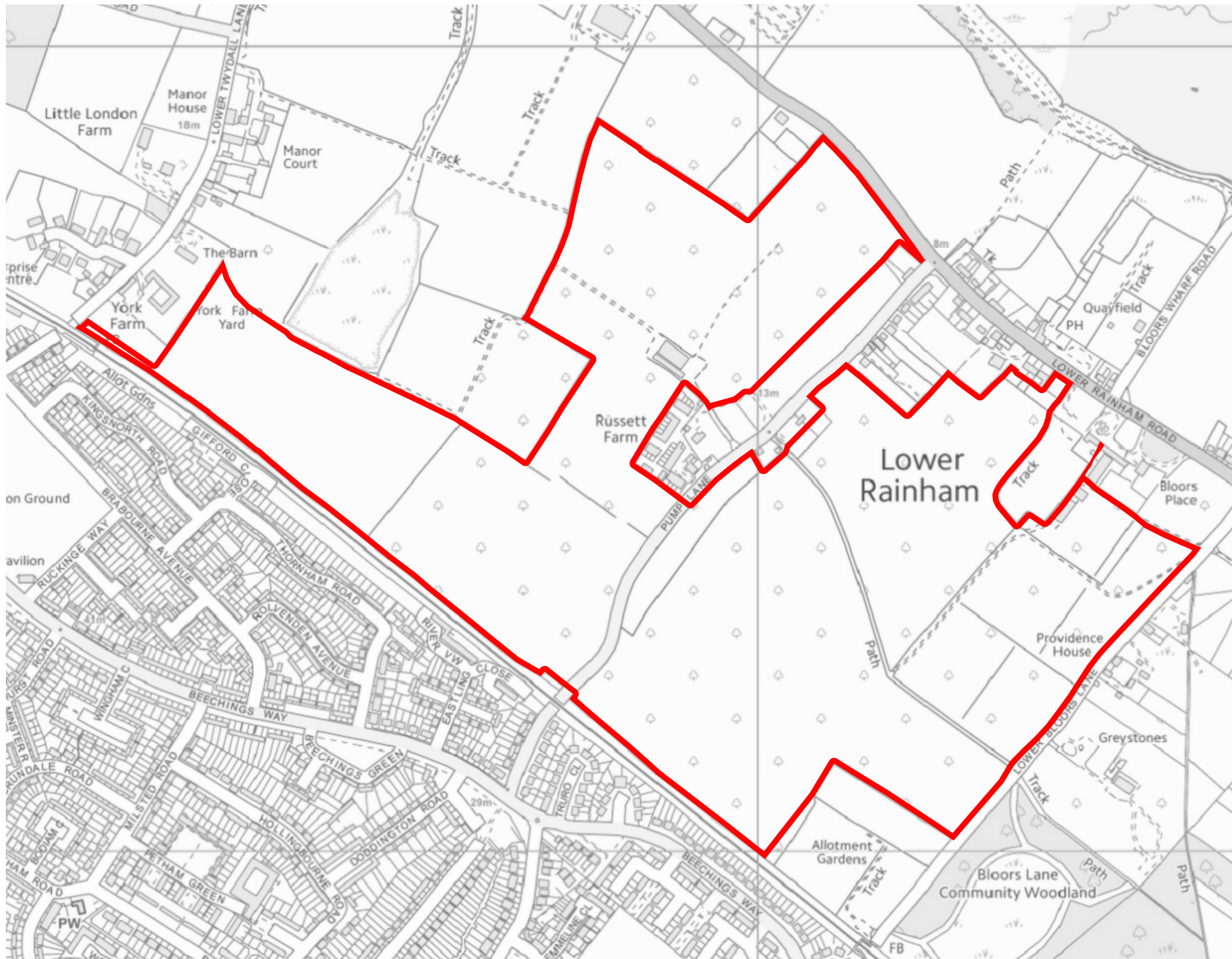
4.13 The policy requires a Health Impact Assessment be prepared for major new residential development where Environmental Impact Assessment (‘EIA’) are required, and such an assessment is to be prepared in line with the HUFU Rapid Health Impact Assessment Tool. We do not consider that this requirement is necessary in this policy as Health Impact Assessments are required as part of an EIA under the EIA regulations, which also set out the scope and requirement for Health Impact Assessments. We therefore suggest that this criterion is unnecessary and should be deleted.

POLICY HC2 - COMMUNITY FACILITIES

4.14 The policy requires provision to be made for community facilities within new developments. We do not object to the principle of this aspiration, but such a requirement should be considered based on the scale of the development and any need for such provision, taking into account the existing community facilities.

POLICY I3 - EDUCATION

4.15 This Policy requires that new residential development of significant scale to provide education facilities within their development in order to create sustainable communities. This requirement is too vague in terms of the definition of “significant scale” residential development and “educational facilities”. In any event, educational facilities such as the need for school provisions should be informed by a school placement study, and should not be an automatic policy requirement for all significant scale residential developments.



SITE LOCATION PLAN
Bloors Farm/Pump Farm
LOWER RAINHAM



Scale @ A3 : 1:5000
Plan No. : 18-01307_SLP01

Representations to Medway Local Plan


Redrow Homes – South East

Land South of Britannia Lane
High Halstow

25 June 2018

Prepared by

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Public

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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.

This document must only be treated as a draft unless it is has been signed by the Originators and approved by a Business or Associate Director.

DATE	ORIGINATORS	APPROVED
25 June 2018	Jessica Wilson Planner	Roland Brass Associate Director
		

Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

1 INTRODUCTION

- 1.1 These representations are submitted to Medway Council in response to the Medway Local Plan 2012-2035 Development Strategy Regulation 18 consultation which runs from 16 March to 25 June 2018.
- 1.2 This document has been prepared by GL Hearn on behalf of Redrow Homes, who have a land interest at Land South of Britannia Lane, High Halstow 'the site'. This site is identified in the Local Plan Reg 18 as site 1113 "Land East of High Halstow".
- 1.3 The purpose of our representations is to provide comments to help ensure that the Medway Local Plan is sound and is in accordance with national planning policy.
- 1.4 This document is split into two main parts:
 - Section 2 provides our responses to specific questions raised in the Local Plan Reg 18 consultation and provides relevant references to national planning policy including the adopted NPPF (2012) and revised draft NPPF (2018).
 - Section 3 provides further information on the development opportunity at High Halstow including an indicative masterplan, design principles and information on deliverability.
- 1.5 In summary, we support the preparation of a new Local Plan for Medway. It is important that the plan is prepared in accordance with national planning policy, and consideration must be given to the draft revised NPPF (2018). The Local Plan strategy aims to fully meet its identified local needs for housing and we consider that site 1113 at High Halstow plays an important role in achieving this overall objective.
- 1.6 Moving forward, and as part of the plan-making process, we welcome the opportunity to further discuss any matters and engage in constructive and collaborative consultation with Medway Council, the community and relevant stakeholders to help bring the site forward to deliver a range of benefits.

2 COMMENTS ON DRAFT LOCAL PLAN

National Planning Policy Context – Tests for Soundness

- 2.1 Our response considers the Local Plan consultation documents in light of national planning policy, including the NPPF (2012) as well as the recently published revised Draft NPPF (2018). It is expected that the Draft NPPF (2018) will be adopted in summer 2018 and that transitional arrangements will cover a six month period. Therefore, in light of the plan-making timetable, the revised NPPF (2018) will be an important consideration for the Local Plan.
- 2.2 Para. 182 of the NPPF (2012) relates to examining Local Plans and clearly states that during the Examination the Inspector will assess whether the Local Plan *“has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound”*.
- 2.3 This section provides our responses to the following questions set out in the Local Plan Reg 18 consultation. We provide comments on the following matters:
- Development Strategy
 - Housing Delivery, Housing Mix, Affordable Housing, Specialist / Older Persons Housing, Custom / Self Build
 - Retail
 - Landscape
 - Design, Sustainable Design, Housing Design, Housing Density
 - Health
 - Community Facilities, Infrastructure, Education
 - Transport, Connectivity, Parking
 - Waste disposal.

Development Strategy

Question DS1 – *Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth? What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?*

- 2.4 We support the proposed spatial development strategy which aims to make the best use of land and bring forward development (i) through regeneration, (ii) at Hoo small rural town and (iii) at suburban locations including villages. A combination of all of these approaches to development will be required for Medway to achieve its housing target. In particular, we support the proposals for development across the villages, including High Halstow, where sites can come forward in a sustainable manner.

Growth Scenarios and Housing

- 2.5 We recommend that the Local Plan seeks to adopt Growth Scenario 3, which is based on the Government's standard methodology for calculating local housing needs. This approach to plan-making is in accordance with the proposals set out in the draft NPPF (2018) Para 61. We support the higher level housing target which is in line with the Government's objective of *"significantly boosting the supply of homes"* (draft NPPF 2018, Para 60).
- 2.6 We recommend that the Council recognises that the application of the standard methodology approach offers a range of local and national benefits. It ensures a consistent and fair approach is applied by all LPAs across the country, and it will help work towards achieving the national objective to provide 300,000 net housing additions each year in England. The application of the standard methodology approach, alongside duty-to-cooperate, should be considered by the Council to be of paramount importance to provide the basis of a sound Local Plan. By adopting this approach the Council would also save a disproportionate amount of time discussing objectively assessed need at the Local Plan examination.
- 2.7 Further guidance on housing targets is set out in draft NPPF (2018) Para.61 which states: *"In determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In establishing this figure, any needs that cannot be met within neighbouring areas should also be taken into account"*. We do not consider that exceptional circumstances exist as the characteristics of the Borough are not uncommon to other LPAs across the South East e.g. relatively high proportion of constrained land such as Green Belt, floodplain or other designations.

- 2.8 Growth Scenarios 1, 2 and 4 achieve the housing need figure of 1,281 dpa (29,463 dwellings over the plan period) set out in the Strategic Housing Market Assessment 'SHMA' (2015). This calculation is considered out of date and should be replaced by the Government's standard methodology figure. Any update to the SHMA would need to consider the latest 2016 sub national population projections which were recently published.
- 2.9 Once the objectively assessed needs figure or standard methodology suggested figure is established this should form the starting point for the housing target. In accordance with Government advice this figure will need to consider market signals, improving affordability, supporting economic growth and meeting unmet needs. Each is discussed below.
- Firstly, in terms of market signals and improving affordability, the NPPG outlines that adjustments to assessed housing need should be made to reflect market signals, outlining that rents or prices rising faster than the national / local average may well indicate market undersupply; and that a worsening trend in any of the market signals will justify an upward adjustment to planned housing numbers. In considering the size of uplift to account for market signals, there are a range of Inspector's decisions which have recommended uplifts between 5% to 25%. Notably, more recent decisions from higher value areas in the South East have seen uplifts exceed 20% in Braintree, Cheltenham, Waverley, Canterbury and Cambridge. In Medway affordability is considered to be a key concern, as median affordability ratios have increased from 6.47 to 8.25 over the period from 2007 to 2017. In addition, the Council has identified a need to deliver 17,112 affordable units over the plan period to meet affordable needs. This figure is challenging to achieve (and would realistically require an overall housing target of around 68,000 dwellings) therefore a higher uplift is required to help deliver more affordable units. We would therefore expect a relatively high uplift of 20% to be applied to Medway.
 - Secondly, in terms of supporting economic growth, the Local Plan Reg 18 proposes significant employment growth of around 17,000 new jobs. It is important that this high level of jobs growth is reflected in the housing target and that housing delivery should not constrain economic growth.
 - Thirdly, unmet need is closely linked to duty to cooperate as Medway will need to identify whether any neighbouring LPAs will be unable to meet their development needs. If they cannot, then the Council must consider whether it can support those LPAs.
- 2.10 The Council is able to demonstrate it can achieve the SHMA 2015 figure however it falls short in Scenario 3 to achieve the standard methodology figure. We acknowledge that this highlights the challenge facing Medway.
- 2.11 Within each of the four growth scenarios the potential residential capacity for each site is estimated. We recommend that further capacity studies are undertaken, especially to consider site specific circumstances, to inform the preferred option to be set out in the Local Plan Reg 19.

Evidence Base

- 2.12 As part of this process we recommend that a range of evidence base studies are updated. Specifically, in terms of housing the SHMA must be updated to take account of latest

population figures and other information, and the SLAA must be updated to provide the latest information on potential site opportunities. On this matter, our main concern is that the SLAA 2017 identified site 1113 as not suitable for development however the site is allocated in the Local Plan Reg 18.

- 2.13 Other evidence base documents relating to sustainability appraisal, transport, infrastructure, phasing and landscape should also be updated so that the preferred approach set out in the Local Plan Reg 19 is fully justified. This is in accordance with NPPF (2012) Para 158 which states that *“Each LPA should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”*
- 2.14 This work would help address our concerns in relation to the scale of growth envisaged across Medway, in relation to references in draft Policy DS2 regarding the *“small rural town based around Hoo St Werburgh”* and *“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”*.

High Halstow / Site 1113

- 2.15 Significantly, the Local Plan Reg 18 growth scenario mapping shows that all four Growth Scenarios include site 1113 (Land South of Britannia Lane, High Halstow). We support the inclusion of this site in all growth scenarios and consider that this highlights the important contribution the site makes towards achieving the housing target. The site represents a logical village extension to High Halstow on unconstrained land in Medway e.g. not Green Belt or floodplain. It is a fundamental component of growth at suburban locations including villages and should remain in the Local Plan.
- 2.16 It is our understanding that the Council has estimated its potential residential capacity to be 699 units. We support this housing allocation and the suggested level of development and recommend that the Council allocates the site for housing in the preferred option to be set out in the Local Plan Reg 19.
- 2.17 Section 3 of this document provides further details on the site at High Halstow including high level development framework which demonstrates that 700+ units, plus supporting services and infrastructure, could be delivered on site.

Phasing and Delivery

- 2.18 In terms of phasing and delivery, The NPPF (2012) advises that LPAs should “identify and update annually a specific supply of *specific deliverable Sites*” for housing for years 1-5 (Para. 47). *“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable” (Footnote 11).*
- 2.1 The draft revised NPPF (2018) states that in identifying land for homes, plans should identify a supply of “*specific, deliverable sites for the years one to five for the plan*” (Para 68). The glossary in the draft revised NPPF (2018) defines “*deliverable*” as the following: *“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Small sites, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.*
- 2.2 Overall we consider that site 1113 is deliverable and therefore we recommend it should be allocated for housing development in the first five years of the plan period. It is deliverable for the following reasons:
- The site is available for development – Redrow are currently in positive discussions with existing landowner.
 - The site offers a suitable location for development – site 1113 is identified for development in each of the four growth scenarios set out in the Local Plan Reg 18. The site is located on Hoo Peninsula and represents a suburban growth location which is one of three approaches to growth to be adopted by the Council. It forms a logical extension to the existing village of High Halstow which is identified as a local centre with a range of services and facilities.
 - *Development on the site is achievable with a realistic prospect that housing will be delivered on the site within five years.*

Housing Delivery

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

- 2.3 Our comments on the housing target are set out in response to Question DS1. In summary, the housing target should reflect the Government’s standard methodology

figure (1,665 dpa). This approach is in accordance with draft NPPF (2018) Paras 60 and 61.

- 2.4 We suggest that it is important that draft Policy H1 considers proposals set out in the draft NPPF (2018) Para 11. In particular, “*plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change*”. Therefore flexibility must be built into the housing delivery strategy and the Local Plan must carefully consider co-ordinating and phasing the future supply of sites over the plan period. This is particularly important in relation to infrastructure and service provision. We recommend that any sites which are not dependent on new infrastructure are identified by the Council. We suggest that site 1113 at High Halstow is one such site.
- 2.5 We recommend that any site specific masterplans for potential allocations should be prepared with site promoters / developers / landowners, and this process should not slow down sites being brought forward by planning applications assuming that there are no obstacles to development e.g. infrastructure provision or adverse environmental impacts.
- 2.6 This approach will require joint working between the Council and developers to ensure the effective use of land and the delivery of sites to contribute towards achieving the housing target.
- 2.7 **Site 1113** at High Halstow would be able to be delivered at pace. Redrow have a strong track record e.g. Ebbsfleet Green 950 unit scheme, of delivering around 200 new homes per annum. Therefore based on a potential development capacity of at least 700 dwellings, the site could be built out within 4-5 years. This pace and level of development would make a significant contribution towards the five year supply of housing land and the overall housing target.

Housing Mix

Question H2 – *Does the proposed policy for housing mix represent a sound approach? Would you suggest an alternative approach?*

- 2.8 We support the mix of housing types proposed in draft Policy H2, and that this mix must be appropriate to the site and location. We recommend that the SHMA (2015) is updated to ensure the Local Plan is based on the latest evidence.
- 2.9 We support the wording in draft Policy H2 that “*an appropriate range of house types*” should be included in the mix of housing to address local requirements.
- 2.10 In terms of custom / self build, we object to the suggested level of provision on large sites set out in draft Policy H9. Further details on this are provided below.

- 2.11 **Site 1113** at High Halstow would be able to provide mix of homes, including high quality family sized units to meet local needs.

Affordable Housing

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?*

- 2.12 We support the provision of affordable housing as part of new residential-led development. We recommend that the proposed level of affordable housing provision for the new Local Plan are tested and justified as part of the Local Plan evidence base.

- 2.13 **Site 1113** at High Halstow would be able provide 30% affordable housing to help meet local needs.

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

- 2.14 We support the provision of affordable rent and intermediate housing (in the form of shared ownership). Local Plan Reg 18 Para 4.13 suggests a split of 60% affordable rent and 40% intermediate, generally in the form of shared ownership. We recommend that the policy allows for more flexibility. It should be considered to be a target rather than a mandatory requirement. In addition, the proposed split might change overtime in response to local needs, affordable housing policy / legislation and funding. Given that development will be phased over the plan period, we recommend that the suggested split needs to be able to reflect the circumstances at the time that the S106 is being negotiated.

Specialist / Older Persons Housing

Question H5 – *Do you agree with this policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation?*

Question H6 – *Do you consider that the council should promote the development of retirement villages, or other such clusters of specialist housing to meet needs?*

Question H7 – *Do you consider that the council should require large residential developments of over 400 homes to include provision for specialist and supported housing within its proposed scheme?*

- 2.15 We support the provision of supported housing, nursing homes and older persons accommodation. The needs led approach set out in draft Policy H4 is considered to be appropriate.

- 2.16 **Site 1113** at High Halstow is potentially able to provide specialist accommodation for the older population if there is identified local needs.

Custom / Self Build

Question H17 – *Do you agree that sites of a certain size should offer a percentage of the plots to self / custom builders?*

- 2.17 We object to sites over 400 dwellings making at least 5% of the plots to self/custom builders for purchase as suggested in the Local Plan Reg 18 supporting text to question H17.
- 2.18 We recommend that the Council reconsiders this level of provision because the proposed approach is inconsistent with NPPG Para 57-025 third bullet which states that “*engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested*”.

Retail

Question RTC1 – *Do you consider that the proposed policy represents an effective approach for managing a retail hierarchy in Medway?*

Question RTC5 – *Would you propose any alternative approaches to Medway’s retail hierarchy?*

- 2.19 The retail hierarchy makes no reference to village centres (which are considered in Local Plan Reg 18 Paras 6.1 and 6.4). Previously the Policy R10 of the adopted Medway Local Plan 2003 identified High Halstow as a ‘Village Centre’.
- 2.20 We consider that the policy and retail strategy recognises it is important to maintain all centres including village centres as part of sustainable development. This approach is in accordance with NPPF (2012) Para 55 and draft NPPF (2018) Para 80 which encourage opportunities to support local services.
- 2.21 **Site 1113** at High Halstow would help support existing local services and facilities in the village centre.

Landscape

Question NE4 – *Do you consider that this is an effective approach to landscape policy in Medway? What alternative approaches would you recommend?*

- 2.22 We support the approach to landscape set out in draft Policy NE4. We recommend that site capacity studies and masterplanning, as well as discussions between the Council and developers, are informed by the updated Landscape Character Assessment and Green Infrastructure Framework.
- 2.23 Proposals for the **Site 1113** at High Halstow would take account of landscape considerations as part of the masterplanning process.

Design

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?

- 2.24 We support the approach to promoting high quality design set out in draft Policy BE1. We recommend that the Council adopts the Government's approach, in that Lifetimes Homes have been replaced by Building Regulations (Part M) and that affordable units only should comply with this standard. We support the approach that compliance with the regulations "so far as practicable" is expected across all proposed housing.

Sustainable Design

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?

- 2.25 We support the application of national space standards. The Local Plan should apply national standards over local standards, as required by Government policy. There is no justification in the evidence base for an alternative approach.

Housing Density

Question BE4 – Does the proposed policy for housing density represent the most appropriate approach for the Medway Local Plan?

Is there an alternative way to express optimum net residential density, e.g. habitable rooms per hectare?

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

- 2.26 We support the approach that densities should be reflective of surroundings and make the most effective and efficient use of land. We recommend that the wording in draft Policy BE4 states that the Council will consider density on a case by case basis on all sites, not just regeneration sites.
- 2.27 We support the wording in draft Policy BE4 that "a range of house types should be considered regarding housing mix."
- 2.28 **Site 1113** at High Halstow could deliver at least 700 new homes. For such rural locations, Redrow would commonly be forward around 36-38 dph (net). We recommend that the Local Plan allows for such a level of development at High Halstow.

Health

Question HC1 – Does the proposed policy for Health and Wellbeing represent the most appropriate approach to planning for health improvements in Medway?

Question HC2 – Do you agree with the proposed threshold for HIAs?

- 2.29 We support the approach towards promoting health and well-being. In terms of thresholds for HIAs, we suggest the requirement for all applications requiring an EIA to undertake a HIA and all applications to demonstrate how potential negative effects on health have been mitigated is unnecessary and is an additional burden on applicants.

- 2.30 NPPG Para 53-004 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 a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring an HIA.
- 2.31 The proposals for **site 1113** at High Halstow would aim to improve health and wellbeing for new residents and the existing community.

Community Facilities

Question HC5 – *Does the proposed policy for Community Facilities represent the most appropriate approach to planning for this aspect of social needs in Medway?*

- 2.32 We support the approach towards provision of new community facilities as part of new development which is set out in draft Policy HC2.
- 2.33 **Site 1113** at High Halstow would be able to deliver at least 700 new homes. Based on this level of development, a new 2FE primary school could be provided. This school would be able to serve the new development and existing community and surrounding area.

Infrastructure

Question I1 – *Does the proposed policy for Infrastructure planning and delivery represent the most appropriate approach to planning for infrastructure improvements in Medway?*

- 2.34 We support the approach to infrastructure planning and delivery set out in draft Policy I1. We recommend that site capacity studies and masterplanning, as well as discussions between the Council and developers, are informed by the updated Infrastructure Delivery Plan.

Question I2 – *Does the proposed policy for developer contributions represent the most appropriate approach?*
What do you consider would represent a sound alternative approach for developer contributions in the Medway Local Plan?

- 2.35 We suggest that the approach towards developer contributions in the Local Plan needs to be carefully considered in light of potential significant future infrastructure works. This will need to be justified and tie into the overall quantum, phasing and distribution of planned development.

- 2.36 We do not support the suggested 'Open book' approach. We recommend that the Council adopts a more flexible approach as it must acknowledge that each site and proposals e.g. land acquisition details are different.

Education

Question I3 – *Does the proposed policy for Education represent the most appropriate approach for planning for education facilities?*

- 2.37 We support the approach towards proposals for new education facilities e.g. primary schools set out in draft Policy I3.
- 2.38 **Site 1113** at High Halstow would be able to deliver at least 700 new homes. Based on this level of development, a new 2FE primary school could be provided. This school would be able to serve the new development and existing community and surrounding area.

Transport

Question T2 – *Do you agree/disagree that this approach offers an appropriate strategic approach towards a pattern of development which facilitates sustainable transport in Medway?*

- 2.39 In terms of net residential densities, we recommend that the proposed densities are set out as minimum standards in draft Policy T2. It is important that this policy is set out in conjunction with draft Policy BE4 which aims to ensure that densities are reflective of surroundings and make the most effective and efficient use of land. Draft Policy BE4 also suggests that the Council will consider density on a case-by-case basis in certain locations and therefore we suggest that the reference in draft Policy T2 that "*proposals which compromise this policy will be resisted*" should be reconsidered.

Question T4 – *The optimum densities set out at Table 11.1 are likely to be achieved in the absence of this policy due to their central locations. Is it appropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs? For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare? Would it be appropriate to include Cuxton and Halling stations in Table 11.1?*

- 2.40 In terms of densities in peripheral areas, we recommend that 35 dph is considered as a minimum requirement and that in certain areas the Council might need to consider densities on a case by case basis.
- 2.41 **Site 1113** at High Halstow could deliver at least 700 new homes. For such rural locations, Redrow would commonly be forward around 37-39 dph (net). We recommend that the Local Plan allows for such a level of development at High Halstow.

Question T6 – *Do you support the principle of a rail upgrade to the Grain freight line to enable passenger services and increased rail freight?*

- 2.42 We support the proposals for the new Hoo Peninsula rail connection, however it would be useful if the Council is able to share further details including the location of safeguarded land with relevant developers to help inform the masterplanning process.
- 2.43 **Site 1113** at High Halstow would benefit from the proposed rail upgrade to enable passenger services. The existing un-used railway line runs 800 m to the south of the site, and we would expect any new railway station to be within walking distance of the village (and site). This line would improve the public transport connectivity in the local area. Importantly, in terms of phasing, we consider that the site is capable of coming forward in advance of any rail upgrades and the development of the site is not reliant on the rail upgrade.

Connectivity

Question T14 – *Do you agree with the proposed policy for connectivity and permeability in Medway?*

- 2.44 We support the proposed approach to connectivity and permeability set out in draft Policy T9.
- 2.45 In light of this approach, we suggest that the Council might need to consider using its powers e.g. CPO, to ensure that where required the network of safe pedestrian and cycle routes are expanded in an appropriate manner to support existing and new communities.
- 2.46 **Site 1113** at High Halstow would be well connected and integrated to the existing village. Proposals would seek to improve local connectivity and permeability.

Parking

Question T15 – *Do you agree with the proposed policy approaches for managing the transport impacts of development and provision for parking?*

- 2.47 We suggest that the Council adopts a flexible approach to car parking which takes account of site specific circumstances. We understand that the Council is undertaking a strategy transport assessment and the findings of this study will need to be consulted upon as part of the plan-making process.

Waste Disposal

Question MWE2 – *Do the proposed policies MWE6-MWE10 represent the most sustainable approach to managing Medway's waste?
What do you consider would represent a sound alternative strategy for waste management in the Medway Local Plan?*

- 2.48 In response to draft Policy MWE9 on waste disposal to land, we are concerned that the "disposal to land areas" set out on the plan on page 180 of the Local Plan Reg 18 covers part of site 1113 (Land South of Britannia Lane, High Halstow).

- 2.49 We recommend that this area of land covering site 1113 and surrounding area is discounted from the disposal to land area because is it allocated for potential residential development, which forms part of each of the four growth scenarios, considered by Medway. Therefore the current approach is inconsistent. If this plan is not to be amended, we suggest that additional criteria is added to draft Policy MWE9 which considers whether the site have development potential.

3 DEVELOPMENT OPPORTUNITY

- 3.1 This section sets out our approach to the residential-led development opportunity at High Halstow on Land South of Britannia Lane.

Indicative Masterplan

- 3.2 The land is identified as site 1113 in the Local Plan Reg 18 consultation, and the Council have estimated that it has a potential residential capacity of 699 units. This is based on 50% of the site being used for “infrastructure” and a net developable area ‘NDA’ of 19 ha with an average density of 35 dwellings per hectare ‘dph’.
- 3.3 The Indicative Framework for the site set out in **Figure 1** shows that this level of development is able to be delivered on site. The Indicative Framework has been designed at a high level and represents our initial thoughts on how the site might be developed.
- 3.4 **Table 1** below demonstrates how a range of design and development principles have been incorporated into the proposals.

Table 1: Design and Development Principles

Design / Development Principle	Indicative Proposal
Design	
Landscape-led approach to site masterplanning	Based on initial high level review land with lower landscape value and higher landscape capacity is located to the west of the site. Therefore development to adjoin existing village and be focussed to the west.
50% for “infrastructure” and 50% for residential development (in line with Council's approach)	20 ha (approx. 50%) of total site for landscaping, open space, infrastructure and non-residential uses. 20 ha (approx. 50%) of total site is net developable area for new housing.
High quality new development	Redrow development to be similar high quality as other schemes across Kent e.g. Ebbsfleet Green. Redrow are willing to invite Medway planners and members to undertake site visit to view the built out scheme and show homes. Proposals to respect local character and distinctiveness.
Housing	
New homes to meet local needs	Proposals to include at least 700 new homes to be built out at around 35 dph.
Mix of homes	Proposals to include a range of house types and sizes including family units. High quality proposals including Redrow Heritage range, with focus on new houses with gardens and design to reflect local area.
Affordable housing	Proposals to include Local Plan policy compliant level of affordable housing.
Delivery	Proposals are capable of being delivered at pace e.g. at Ebbsfleet Green Redrow are building around 200 dpa.
Community	
Community services and facilities	Provision of new primary school (2 ha) to the requirement of the new development and meet local needs. Any additional community services and facilities would be considered as part of the design and consultation processes. Proposals would also help support existing services and facilities.
Community involvement	We adopt a strong leadership position on all projects, and this would need to be backed up by political support and commitment to bring forward the site. We are committed to undertaking meaningful consultation with key stakeholders, including the local community.
Movement	
Connectivity and permeability	Clear and logical layout. Layout designed to link into existing footpaths and cycleways and provide a series of connected spaces.
New access	New main vehicular access off Christmas Lane. Secondary access of Britannia Lane.
Health	
Healthy communities	Proposals include care home, allotments, substantial open space with extensive trim trail (in addition to potential to enhance sports facilities) which boost healthy living credentials of the site and respect the rural setting.
Accessibility and transport	Proposals designed around connected spaces to promote walking and cycling to reduce the reliance on the private car. Public transport improvements, especially to rail and bus service, would be expected as a result of development of on Hoo Peninsula.
Landscape and open space	
New planting	Redrow's approach is to plant mature trees and vegetation from the outset of the project to help create a green and attractive environment.
Open spaces	Proposals to include connected open spaces and play areas in accordance with policy and national standards.
Other	
Environment and Sustainability	New building designs and technologies (e.g. electric charging points) to achieve resilience and reduce the impact on the environment.
Economic impact	Proposals would be expected to create new local employment opportunities through construction and direct and indirect effects. High quality new homes to help attract more skilled workforce to Medway.

Figure 1: Indicative Masterplan for Land South of Britannia Lane (site 1113)



MEDWAY COUNCIL LOCAL PLAN
2012 - 2035
REGULATION 18 CONSULTATION

Response to Public Consultation

On behalf of
Taylor Wimpey Strategic Land

June 2018

MEDWAY COUNCIL LOCAL PLAN
2012 – 2035 REGULATION 18 CONSULTATION
RESPONSE TO PUBLIC CONSULTATION
ON BEHALF OF
TAYLOR WIMPEY STRATEGIC LAND
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APPENDICES

Appendix A: Site Location Plan (M01)

Appendix B: Concept Masterplan

1.0 INTRODUCTION

i) Purpose of these Representations

- 1.1 These representations are submitted on behalf of Taylor Wimpey Strategic Land in response to Medway Council's (MC) Local Plan 2012-2035 Development Strategy (Regulation 18) consultation (LPDS, March 2018). Taylor Wimpey Strategic Land has a land interest in a site known as 'Land West of Hoo St Werburgh' (hereafter referred to as 'the Site'). A Site Location Plan is included at **Appendix A**.
- 1.2 The Site is being promoted as part of a Consortium of landowners and promoters with interests around Hoo St Werburgh (hereafter referred to as 'the Consortium'). The Consortium has developed a vision for the expansion of Hoo St Werburgh into a sustainable rural town, for mixed-use development including circa 6,800 dwellings [hereafter referred to as the Hoo Peninsula Rural Town (HPRT)].
- 1.3 The vision for the HPRT was set out in detail in the Hoo Development Framework Document (HDFD), which was submitted on behalf of the Consortium to the Local Plan Development Options (LPDO) Regulation 18 Consultation in May 2017.
- 1.4 A further refined concept masterplan, supporting evidence and justification, has been included as part of the Consortium representations submitted in response to the LPDS. TW are wholly supportive of the Consortium Representations, including the updated concept masterplan.
- 1.5 Notwithstanding Taylor Wimpey's support for the HPRT, these representations demonstrate that the Site is a sustainable location for development in its own right and furthermore the Site is available to come forward at the very start of the Plan period, making an important and much needed contribution to the Borough's housing land supply.

ii) Purpose of the LPDS

- 1.6 MC previously consulted on its Local Plan Issues and Options (LPIO) document between January and February 2016 (under Regulation 18). The LPIO consultation did not set out detailed policies or identify specific development sites, rather it sought representations on key contextual matters and potential approaches that could be taken forward in the new Local Plan strategy.

- 1.7 MC subsequently consulted (under Regulation 18) on its Local Plan Development Options (LPDO), setting out a draft vision and strategic objectives for the area and four potential development options available to meet Medway's identified needs over the Plan period (2012-2035).
- 1.8 The current LPDS consultation (under Regulation 18) progresses forward from the LPDO, setting out a draft spatial development strategy (Policy DS2) which comprises a focus upon regeneration of brownfield land and the creation of a new 'Rural Town' on the Hoo Peninsula. Whilst the LPDS clearly sets out a draft spatial development strategy, it also seeks view on four variations on the strategy ('Scenarios'):
- Scenario 1 – Meeting Objectively Assessed Need;
 - Scenario 2 – Investment in Infrastructure to unlock growth;
 - Scenario 3 – Meeting Government's proposed calculation of Local Housing Need;
 - Scenario 4 – Consideration of development within Lodge Hill SSSI.
- 1.9 The LPDS also identifies some draft policy approaches, on which views are sought. In addition, an interim Sustainability Appraisal has been published in support of the LPDS consultation.
- 1.10 It is noted that an updated Strategic Land Availability Assessment (SLAA) has not been published in support of the LPDS. My clients thereby reserve the right to comment on the updated SLAA as and when it is published, and any implications it might have for the Development Strategy.

iii) Content of Representations

- 1.11 As well as confirming TW support for the HPRT as the key component of the spatial development strategy, these representations set out the following comments:
- Emphasising the importance of having regard to the emerging requirements of the draft National Planning Policy Framework as the Council finalise the spatial development strategy for Medway and prepares the Regulation 19 Draft Plan;
 - Highlighting concerns with regard to MC's approach to meeting housing needs, most notably in respect of the failure to fully engage with the emerging 'standard method' housing requirement;
 - Highlighting the implications of the emerging five-year housing land supply 'buffer' requirements;

- Highlighting concerns with regard to the approach that MC is taking towards infrastructure planning, particularly with regard to the HIF Bid and the 'eastern extension' of Hoo;
- Suggesting that the Plan can be made sound by committing to an early review and ensuring that sufficient land is frontloaded to ensure that the housing trajectory is achieved in the first five years of the Plan period;
- Demonstrating the suitability, sustainability and achievability of the Site and highlighting that the site can accommodate circa. 500 units entirely in accordance with the emerging masterplan for the rural town, including accommodating a high-quality north/south green link providing connectivity between the two new Country Parks;
- Confirming that the Site can be delivered very quickly in the Plan period and thereby requesting that the Site is phased at the start of the housing trajectory, making an immediate contribution towards housing land supply; and
- Further requesting that the Council support the Site coming forward early, alongside the publication and submission of the Local Plan.

2.0 LAND WEST OF HOO ST WERBURGH

i) The Site and its Surroundings

- 2.1 The Site lies to the west of Hoo St Werburgh, Kent. The settlements of Wainscott and Strood lie to the south west and a Ministry of Defence landholding at Chattenden lies to the north (Lodge Hill). Nearby to the west is Chattenden whilst Upnor is to the south west on the River Medway. Hoo Marina and Caravan Park are located to the south on the river frontage whilst Kingsnorth Power Station and associated industrial development lie to the east.
- 2.2 The Site is approximately 32.82 hectares in total and extends between the existing urban edge of residential properties on Aveling Close to the east and the A228 dual carriageway to the north-west. The Site is greenfield, currently in agricultural use.
- 2.3 The landform of the Site is undulating, and generally falls in level from north east to south west from a height of around 63 metres above ordnance datum (AOD) to a low of around 30 metres AOD before rising again at the extreme south west. The highest section of the Site forms part of the Deangate Ridge which rises beyond the Site to the north.
- 2.4 Hoo's village centre lies to the south-east of the settlement, approximately 1.6 km from the centre of the Site. The Site is also closer to a broad group of facilities in Hoo that run along Main Road, leisure centre (circa 0.6 km), health facilities (circa 1.2 km) and convenience shops (circa 1 km).
- 2.5 In addition, the Hundred of Hoo Academy is located immediately south of the Site and comprises: a 6FE mixed-gender comprehensive Secondary School for pupils aged 11-19; and a (new) 1FE Primary School. The 1FE facility is designed to be able to extend to a 2FE facility within the existing boundary of the school.
- 2.6 Hoo is also well served by public transport, with Main Road acting as an established route for a number of bus services.
- 2.7 As such, whilst the Site is currently outside but adjacent to the settlement boundary of Hoo St Werburgh, it is in proximity to existing development.
- 2.8 The Site is not subject to any International, National or local landscape designations. Its development should be considered proportionate to this context, in accordance with the NPPF (para 113).

ii) Planning History

- 2.9 In November 2014, an Outline planning application (MC/14/3405) was submitted to MC for mixed-use development on the Site, including the erection of up to 475 dwellings including affordable housing (Use Class C3), up to 200sqm of commercial floorspace (Use Classes A1/A3/A5) and up to 200sqm sports pavilion (Use Class D2).
- 2.10 The Outline planning application was refused by MC's Planning Committee in April 2015 for 2no. Reasons for Refusal. A Section 78 Appeal was subsequently lodged against the refusal, heard by way of a Public Inquiry in August 2016, and dismissed on 06 September 2016 (APP/A2280/W/15/3132141).
- 2.11 The S78 Inspectors principal concern related to the sustainability of the site, particularly in respect of the high degree of reliance on car travel. However, the S78 Inspector's conclusion was arrived at outside of the emerging strategic planning context which has identified HPRT as part of the draft spatial development strategy (Policy DS2).
- 2.12 The assessment of the sustainability and suitability of the Site that needs to be undertaken as part of the preparation of the new Local Plan, having regard to this draft spatial development strategy. The conclusion of the S78 Inspector can therefore provide only relatively limited guidance in respect of the suitability and sustainability of the site. Please see below for further detailed consideration of the suitability of the site.
- 2.13 This notwithstanding the Section 78 Inspectors report provided some important guidance in respect of the technical assessment of the site. Notably in respect of the landscape value of the site (para 84), where the S78 Inspector concluded that the Site has no special or unusual character in terms of its character and appearance. Similarly, in respect of the perceived coalescence of Hoo and Chattenden the S78 Inspector concluded that:

The fundamental landscape function of the Dean gate Cockham Farm ridges in providing structure to the landscape would not be compromised, so I regard the coalescence element of harm to character and appearance as relatively minor. Clearly, although harm to character and appearance would be an enduring, on its own it would not outweigh the benefits of the development. (paragraph 84)

2.14 In addition, the S78 Inspector noted that the benefits of the Outline scheme (MC/14/3405) are substantial (para 82), and specifically noted the following (para 80):

- Economic output generated by future residents (typically, 559 economically active residents generating an economic output of £21.9m per annum);
- Local commercial expenditure by future residents (£8.3m per annum);
- Construction employment opportunities (79 construction jobs).

iii) **Strategic Land Availability Assessment**

2.15 As noted above the an updated SLAA has not been published in support of the LPDS. In the absence of an up-to-date SLAA we provide the following comments in respect of the Suitability, Availability and Achievability.

2.16 **Suitability** - Drawing upon the Council's own SLAA methodology, the following demonstrates that the suitability of the Site for development:

- Designations - The Site is not subject to any International or National ecology or landscape designations. Whilst the Site is located relatively close to the Medway Estuary and Marshes Special Protection Area, it is considered that any recreational impacts arising from the development can be easily managed via the Strategic Access Management and Monitoring (SAMM) measures that are being put in place by Medway Council.
- Accessibility – The Site is directly adjacent to Hoo St Werburgh and has good access to a number of key services and facilities including a primary and secondary school, leisure centre, health facilities and convenience shops. Furthermore it is proposed that local services and facilities will be significantly enhanced through the delivery of the HPRT.
- Transport – The Site is relatively well served by public transport, with Main Road acting as an established route for a number of bus services. Furthermore, it is proposed that public transport will be significantly enhanced through the delivery of the HPRT. The Site is well connected to the existing local road network (A 228) with very good accessibility to the strategic highway network. Furthermore major highway improvements are planned to the Four Elms Roundabout, improving capacity and improving journey times on the strategic highway network directly benefiting the Site.

- Landscape – As noted above the Site has no special or unusual character in terms of its character and appearance, and it has been determined that any harm arising from the perceived coalescence of Hoo St Werburgh and Chattenden would be minor.
- Flood risk – The Site is free from flood risk.
- Heritage – The Site does not include any heritage assets.
- Air Quality – The Site is not within an Air Quality Management Area.
- Contamination – The Site is not known or suspected to be contaminated.
- Agricultural Land – The Site comprises predominantly Grade 3b agricultural land, i.e. not 'best and most versatile agricultural land', with small areas of Grade 3a on the eastern edge of the site, and thereby the loss of this agricultural land can be accommodated without a significant detrimental impact.

2.17 **Availability** - The Site is wholly in the ownership of TW and available for development immediately.

2.18 **Achievable** - Given that it is in the ownership of a national housebuilder, and is broadly free of constraints, the Site is achievable at the very early part of the plan period (post adoption).

2.19 In summary, the Site is suitable for development, achievable and available and is thereby an entirely appropriate location for development, in accordance with the Draft Spatial Development Strategy.

2.20 The remainder of these representations thereby explain how the Site can enhance the soundness of the Local Plan, by delivering development at an early stage in the Plan period and ensuring that the housing trajectory is achieved.

3.0 EMERGING NATIONAL PLANNING POLICY

- 3.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.
- 3.2 On 5 March 2018 the Government published the 'Draft Revised NPPF' for public consultation. The consultation closes on 10 May 2018. Whilst the revised NPPF is still in draft, it is anticipated¹ that the Medway Local Plan will be examined against the policy requirements of the new NPPF. It is thereby essential that MC has regard to the emerging NPPF policy requirements as it prepares the Regulation 19 Draft Plan.
- 3.3 To this end the following seeks to highlight the key policies of the Draft NPPF, focusing on new or amended policy requirements which the Consortium suggests the Council should pay particular attention as it prepares the Regulation 19 Draft Plan in the coming months, namely:
- Section 2 – Achieving Sustainable Development;
 - Section 3 – Plan Making; and
 - Section 5 – Delivering a sufficient supply of homes.

i) Achieving Sustainable Development

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

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

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

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

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

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

3.7 The 'presumption in favour of sustainable development' is set out at Para. 11. For plan making this means:

- "a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;**
- b) strategic plans should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas, unless:**
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or**
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."**

ii) Plan Making

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

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

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

- 3.10 With regard to co-operation across administrative boundaries Para. 29 places greater emphasis on the need for 'Statements of Common Ground':

"In order to demonstrate effective and on-going joint working, strategic plan-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in co-operating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency."

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

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

- 3.12 Para. 35 places greater emphasis on sustainability appraisals informing the preparation of Plans. This paragraph links sustainability appraisals back to the Para. 8 sustainability objectives, and the Para. 9 requirements to seek 'opportunities for net gains' across all three objectives.

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

- a) **"Positively prepared – provides a strategy which will, as a minimum, meet as much as possible of the area's objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;**
- b) **Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;**
- c) **Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and**
- d) **Consistent with national policy – enables the delivery of sustainable development in accordance with the policies in this Framework."**

iii) Delivering a Sufficient Supply of Homes

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

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

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

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

3.17 Para. 73 emphasises the Government's support for large scale development as an approach to supplying a large number of homes:

"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Working with the support of their communities, and other authorities if appropriate, strategic plan-making authorities should identify suitable opportunities for such development where this can help to meet identified needs in a sustainable way. In doing so, they should consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains. They should also consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size".

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

- "a) 5% to ensure choice and competition in the market for land;**
or
- b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year;**
or

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

iv) Summary

- 3.19 The emerging revised NPPF is likely to introduce some policy changes which will have significant implications for the ongoing preparation of the Medway Local Plan.
- 3.20 Most notably the revised NPPF will introduce a requirement for use of the standard method for calculating Objectively Assessed Housing Need; as is discussed in Section 4, it is essential to the soundness of the Plan that this requirement is acknowledged and properly dealt with.
- 3.21 Additionally, there is greater emphasis on developer contribution being dealt with through the Plan making process, placing increased importance on ensuring a robust, properly costed, Infrastructure Delivery Plan forms a key part of the evidence base.
- 3.22 Notwithstanding these important changes, the focus of Plan Making continues to be achieving sustainable development (albeit with a more explicit link between the Sustainability Appraisal and soundness). To this end the Para. 11b test must be the paramount consideration in assessing the extent which Objectively Assessed Needs can be accommodated.

4.0 OBJECTIVELY ASSESSED NEED

- 4.1 As highlighted in the policy context section above, the Government is in the process of introducing the 'standard method' calculation for housing need.
- 4.2 It is noted that LPDS Paragraph 3.7 specifically acknowledges the emerging standard method and the implications for Medway, namely an annual housing target of 1665 dwellings per annum. Paragraph 3.10 states:

"Therefore in preparing for this stage of consultation on Medway's new Local Plan, the council has explicitly considered how it could meet the higher level of housing needs over the plan period, consistent with the strategic objectives of the plan, and requirements of sustainable development".

- 4.3 However, it is noted that only one of the four scenarios seek to reach the standard method requirement, and even then, falls short. Instead the LPDS makes reference to the 2015 Strategic Housing Market Assessment figure in three of the scenarios, despite the very high probability that this figure will shortly be defunct.
- 4.4 Given that the Regulation 19 draft is due to be published at the end of 2018, we are disappointed that MC have not taken the opportunity presented by the LPDS consultation to properly consider, in a meaningful way, how the standard method requirement can be accommodated.
- 4.5 Thereby, we consider that MC must fully accept the standard method figure as a starting point and should seek to meet this requirement as far as possible, as is consistent with achieving sustainable development. MC should not calculate, and seek to justify, an alternative OAHN. The reasons for this are set out below.
- 4.6 Paragraph 61 of the draft NPPF is clear that the standard method should be used unless there are 'exceptional circumstances' that justify an alternative approach. Whilst these 'exceptional circumstances' are not defined in the draft NPPF, with its echoes of well-established Green Belt policy, it is clear that this is a very high bar.
- 4.7 Whilst the LPDS appears to indicate that an alternative OAHN figure may be preferred going forward (namely the 2015 SHMA figure), the consultation document fails to set out the necessary 'exceptional circumstances' which would be required to justify the alternative approach. The Consortium considers that in the absence of a robust exceptional circumstances justification, the Local Plan runs a very high risk of being found unsound.

4.8 It is however noted that the consultation document states at paragraph 3.9 that:

"It is recognised that areas may have important constraints, such as environmental designations, Green Belt, or physical constraints that restrict the ability to meet the needs in full. If this is robustly and soundly assessed, the plan may promote a housing target lower than the Local Housing Need figure. However, the council will be required to explore other options for meeting its area's housing needs, such as providing more land in a neighbouring borough."

- 4.9 We strongly advise that this does not comprise an exceptional circumstances justification for alternative OAHN methodology. Rather this is an explanation for why the OAHN cannot be met. This thereby relates to the Local Plan 'strategy' and the tests of Soundness (Para. 36) and the Presumption in Favour of Sustainable Development (Para. 11), rather than OAHN methodology.
- 4.10 We advise that the Council must accept the standard method figure and work back from this to assess if this can be accommodated in accordance with the Presumption (Para. 11b). Whilst there may be evidence that the full standard method OAHN cannot be accommodated without the *"adverse impacts of doing so significantly and demonstrably outweighing the benefits"*, this must be clearly set out through the SLAA and Sustainability Appraisal. There is a very clear absence of any such evidence at this stage.
- 4.11 In summary, it would be inappropriate for the Council to seek to use an alternative approach to calculate the OAHN, because of an assumption that the Borough is constrained. Further we warn against seeking to justify an alternative methodology with reference to past delivery rates – this is not a demographic issue and would fail to have regard to the Government's very clear objective of significantly boosting the supply of housing (Para. 60).

i) Five-Year Housing Land Supply Buffer

- 4.12 As noted above Draft NPPF Para. 74 requires that as part of Strategic Plans LPA are required to *"include a housing trajectory illustrating the expected rate of housing delivery over the plan period"*. With reference to this housing trajectory LPA are also required to calculate their Five-Year Housing Land position. Importantly the draft NPPF requires buffers (moved forward from later in the plan period) to be applied. Where there has been significant under delivery over the past three years a 20% buffer will be applied.
- 4.13 Given the under delivery in recent years, and the significant increase in Medway OAHN arising from the standard method, it is likely that the 20% buffer Medway will be applied to the Five-Year Land Supply calculation. The 20% buffer would result in a requirement of 1,998 dwellings per annum for the first five years of the Plan period, resulting in a total requirement of 9,990 dwellings.

- 4.14 It is thereby essential that Medway ensure that housing trajectory 'frontloads' sustainable and deliverable housing sites, in an effort to ensure that the enhanced Five-Year Housing Land Supply requirements can be achieved.
- 4.15 Within this context it is suggested that the Council should look to bring forward sustainable sites alongside (or in advance of) the Local Plan, provided this does not undermine the robustness of the Local Plan process, or the soundness of the Local Plan.

5.0 DRAFT SPATIAL DEVELOPMENT STRATEGY

- 5.1 As noted above TW are promoting the Site as part of the Consortium promoting the HPRT as a key component of the spatial development strategy for Medway.
- 5.2 TW are the rebby highly encouraged to note that LPDS provides strong support for the 'Hoo Peninsula Rural Town' (HPRT). TW supports the inclusion of the HPRT as a key component of the spatial development strategy for Medway as set out Policy DS2:

"...Outside of the regeneration areas, the council will support the development of a small rural town based around Hoo St Werburgh that is designed to the highest standards and sensitivity to respect its countryside setting and supported by significant infrastructure investments. The development will be in accordance with a masterplan, to secure the balance of land uses, attractive and effective green infrastructure, phasing to reflect the delivery of improvements required to a range of services and infrastructure..."

- 5.3 TW consider that the making HPRT a key component of the spatial development strategy is entirely in accordance with national planning policy. To this end the TW entirely agrees with the strong justification for including the HPRT in the spatial development strategy set out at paragraph 3.26:

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

- 5.4 TW consider that the HPRT will deliver net gains in all three sustainable development objectives (draft NPPF Para. 8), and thereby demonstrably comprises sustainable development. The inclusion of HPRT as a key component within the spatial development strategy is thereby helping ensure that the Plan will be in accordance with tests of soundness (draft NPPF Para. 36), and the presumption in favour of sustainable development (para. 11b).
- 5.5 TW are committed to developing a detailed masterplan and Infrastructure Delivery Plan (IDP) for the HPRT as part of the Consortium and in close consultation with the Council. TW consider that the emerging proposals for HPRT are entirely in accordance with the Council's emerging requirement as set out at LPDS para. 3.27

- 5.6 TW look forward to further engagement and input from the Council in the coming months, in advance of the preparation and publication of the Regulation 19 Draft Plan.

i) Development Scenarios

- 5.7 Notwithstanding our strong support for the identification of HPRT as a 'core component' of the spatial development strategy (Policy DS2), we have concerns that some of the policy options and approaches considered in the LPDS will undermine the soundness of the Local Plan.
- 5.8 Most of concerns are set out in detail in the Consortium representations, and we do not seek to repeat these here. However, we would like to emphasis two key interconnected issues which we consider are critical and therefore must be addressed in the Regulation 19 Plan: accommodating the standard method housing requirement and planning for the associated infrastructure requirements.
- 5.9 As noted above we consider it essential that the standard method requirement is accommodated as far as possible. However, it is acknowledged that the standard method housing requirement represents a significant increase in the land that must be forward during the Plan period. Whilst we consider it unlikely that environmental constraints would prevent sufficient land being identified, we do recognise that this increased target will necessarily require a substantive additional infrastructure.
- 5.10 To this end we note that Scenario 2 identifies the possibility of increased development being directed towards the HPRT, supported by significant additional infrastructure to be secured. We understand that the Council are exploring if additional capacity can be secured through an eastern extension to the rural town, beyond the area currently being promoted and considered by the Consortium.
- 5.11 Whilst we do not object to this approach in principle, as it potentially offers a mechanism for helping achieve the standard method housing requirement, it is essential that the additional infrastructure planning required to accommodate the additional growth does not delay the progress of the Plan.
- 5.12 This is a particular concern since Scenario 2 explains that the Council is seeking central Government funding, via a bid to the Homes England Housing and Infrastructure Fund (HIF), to deliver significant additional transport infrastructure. It is noted that these time scales do not align with the Local Plan programme. It is essential that the HIF process does not delay the Local Plan. It must be emphasised that the Consortium's current proposals for the rural town can be delivered without any public funding.

- 5.13 It is recommended that the Council could undertake to allocate further land as an eastern expansion to the Rural Town in the next iteration of the Plan. This approach ensures that would support the overarching spatial development strategy, whilst also allowing for the necessary infrastructure planning (including the Highways bid process) to be undertaken to ensure deliverability.
- 5.14 To this end we note that the draft NPPF only requires Plans to identify specific, deliverable sites for years one to five of the plan, with the appropriate buffer, allowing for 'broad locations' to be identified for years 6 – 10. In addition, the draft NPPF also requires the Plan to be reviewed at least once every five years (draft para. 24) in any event. Thereby this 'phased' plan making approach would be entirely in accordance with national policy.
- 5.15 However, the success of this approach is entirely dependent upon the Plan achieving the rate of delivery which accords with the standard method annual requirement and appropriate buffer. This means that Council must seek to bring forward deliverable sites as early as possible. Further consideration is given to the implications of this approach below.

6.0 TIME LY DELIVERY

- 6.1 Whilst TW support the draft spatial development strategy, and the proposed rural town in particular, we consider it essential to the Soundness of the Plan that the Council commit to a review the Plan within five years, and furthermore ensure that sufficient suitable and sustainable sites are 'front loaded' to ensure that the annual housing requirement and buffer can be achieved in the first five years of the Plan.
- 6.2 TW acknowledge that for the Site to be brought forward early in the Plan Period the proposals must be brought forward broadly in accordance with the Council's vision and aspirations for the rural town.
- 6.3 To this end TW has been working very closely with the Consortium and the Council to ensure that the layout, which is included at Appendix B, has evolved specifically in response to the Council's aspirations for the rural town. In particular careful regard has been had to tying the Site into the wider green framework and the school strategy for the rural town.

i) Green Framework

- 6.4 It is understood that the Council are keen that a north/south green link is provided linking a new area of open space at the north of the rural town, with the new Country Park which is proposed along the southern side of the rural town adjacent to the estuary. It is understood that the rationale for this is two-fold:
- Provide functional connectivity between the two areas of open space for residents and visitors;
 - Help to maintain the perception that Hoo St Werburgh and Chattenden remain distinct communities (albeit within the context that the rural town will result in the functional amalgamation of these two settlements).
- 6.5 Whilst TW are broadly supportive of the principle of a north/south green link, it is essential that this link functions effectively as a usable area of public open space. It is thereby essential that the link is designed with reference to the existing character of the area, and seeks to enhance this.
- 6.6 Our landscape architects have looked carefully at this area and have prepared a robust green framework strategy for the site which achieves the Council's aspirations.

- 6.7 However, TW would like to emphasise that, whilst it is important that rural town has a distinct character and identity, and whilst we wholly recognise that this will be strongly shaped by the wider Green Infrastructure framework, this cannot be the only consideration. The Council must also recognise the importance of supporting well-located sites adjacent to the existing settlement boundary, with the ability to be developed early in the plan period. Sites such as these, including our Site, must be efficiently planned to ensure that the 9,900 units that Council needs to secure in the first five years of the Plan are realised.
- 6.8 To this end, the green framework also seeks to ensure that the site continues to accommodate circa. 500 dwellings, helping the Council meet its housing requirement (including the appropriate buffer).

ii) Schools Strategy

- 6.9 TW recognise that the existing communities of Hoo St Werburgh and Chattenden are concerned that the growth of the new town will place significant increased pressure on local facilities and services. To this end TW, working with the Council and the Consortium have sought to ensure that the emerging masterplan for the rural town makes sufficient provision for additional services and facilities to meet the needs of the growing population.
- 6.10 A key issue is schools. As noted in Section 2 the Hundred of Hoo academy has the capacity to expand its new Primary School to 2FE. The primary school capacity adjacent to the Site is three forms of entry, expandable to four forms of entry. In addition, the emerging rural town masterplan identifies the delivery of up to three new primary schools at: the Gladman Chattenden site, the Homes England Lodge Hill site and the Ropers Lane Church Commissioners site. In addition, a new secondary school is proposed to be accommodated on part of the former Deangate Ridge Golf Club site. It is thereby considered that the educational needs of the rural town can be fully accommodated.
- 6.11 However, TW also recognise the importance that infrastructure, and in particular schools are delivered in a timely fashion to meet the incremental growth in needs. To this end TW can confirm that they would be willing to accommodate a further expansion of Hundred of Hoo academy on their site, if this is required to support the early release of their Site. We are keen to explore whether there is a requirement for this at the earliest opportunity with the Local Planning Authority and the Education Authority.

iii) Summary

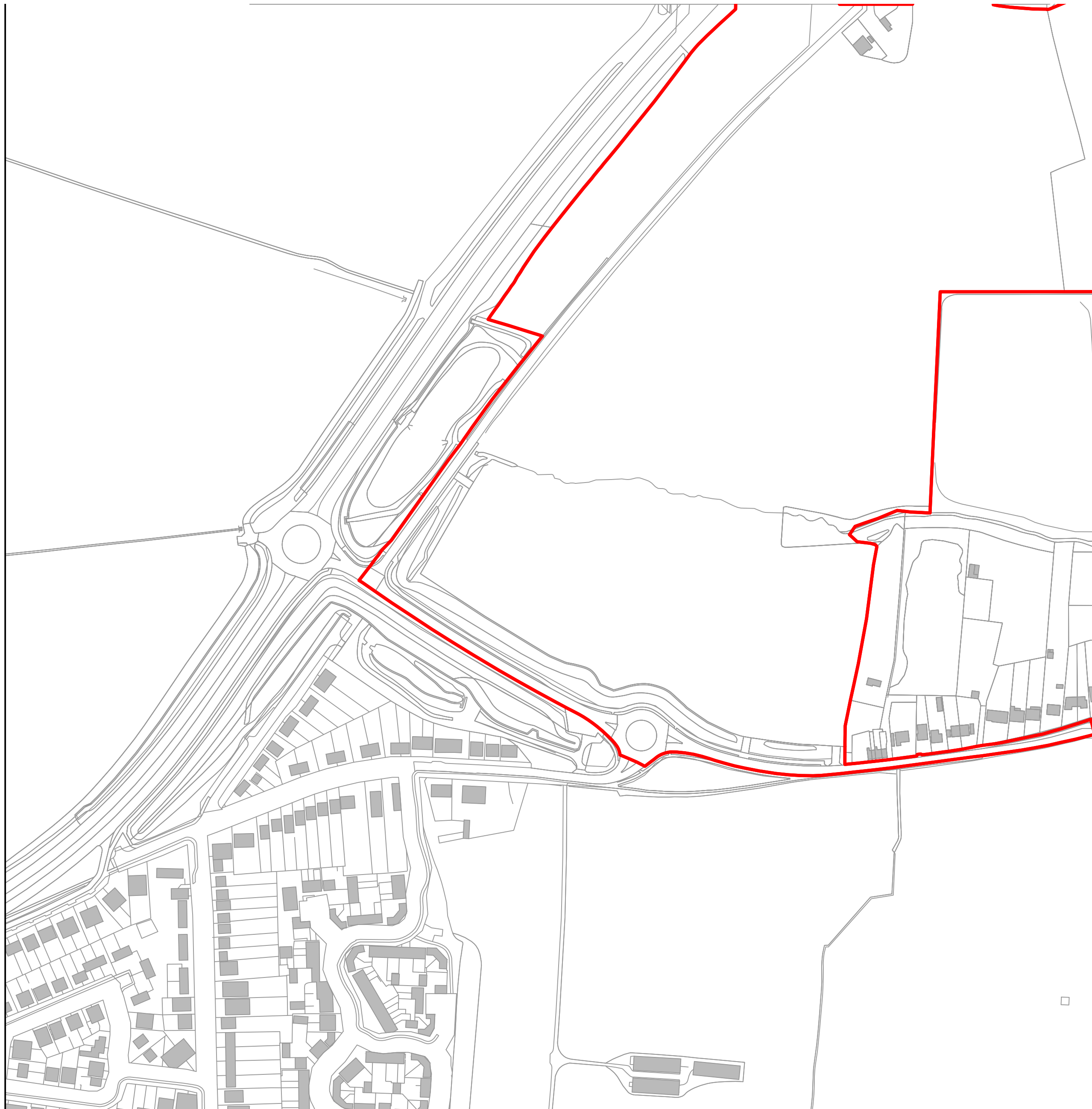
- 6.12 In summary, TW consider that the Site is demonstrably sustainable and can be delivered entirely in accordance with the emerging masterplan for the rural town. Furthermore, as a national house builder with a track record of delivery within the area, can be delivered within very short timescales.
- 6.13 TW thereby request that the Site is identified early in the Local Plan housing trajectory, helping to ensure a five-year supply of housing land upon adoption. Further it is proposed that the Council support TW to bring forward the Site alongside the emerging Local Plan.

7.0 CONCLUSIONS

- 7.1 The NPPF and PPG both put sustainable development at the heart of the planning system (NPPF, para 7) for both plan-making and decision-taking, and describes it as covering three main aspects namely economic, social and environmental.
- 7.2 These representations have confirmed that TW are supportive of the draft Development Strategy as set out in the LPDS, including the focus on the rural town as a key component in particular.
- 7.3 As explained in detail in the Consortium representations the proposed rural town comprises sustainable development, and it is thereby entirely appropriate that this sits at the heart of the development strategy.
- 7.4 However, TW are concerned that there are two significant risks to the soundness of the Plan: The Council's failure to engage with the standard method housing requirement and appropriate buffer; and uncertainties regarding the infrastructure delivery plan, particularly related to the eastern expansion of the rural town and the HIF bid.
- 7.5 These representations have shown that these risks can be addressed by committing to an early review of the Plan to identify land for the period beyond the first five years and also ensuring that sufficient sites are allocated in the first five years of the Plan to meet the standard method housing requirement and the appropriate buffer, approximately 9,990 dwellings.
- 7.6 These representations have identified that the Site is suitable for development, being broadly free from constraints. In addition, TW have sought to ensure that Site can be delivered entirely in accordance with the emerging masterplan for the rural town. Finally, and critically, the Site is wholly in the ownership of a national housebuilder and can thereby delivered at the start of the Plan period helping make an important contribution to the five-year housing land supply requirement.
- 7.7 TW thereby request that the Site is identified early in the Local Plan housing trajectory, helping to ensure a five-year supply of housing land upon adoption. Further it is proposed that the Council support TW to bring forward the Site alongside the emerging Local Plan.

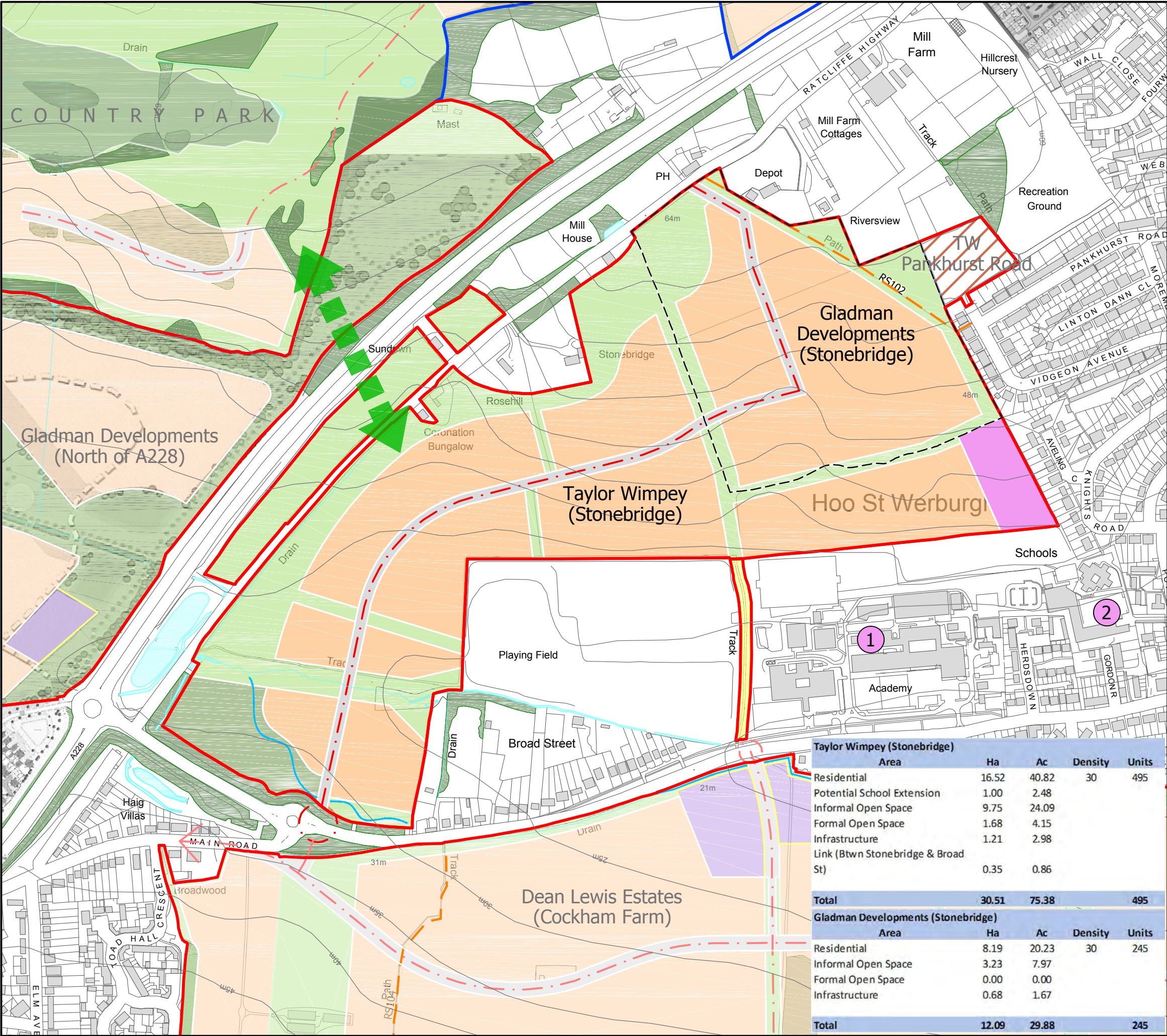
APPENDIX A

Site Location Plan (M01)



APPENDIX B

Concept Masterplan



The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
B Updated Land Use.	25.06.18	ALC	NT

- Site Boundary
- Residential
- Primary School
- Infrastructure
- Informal Open Space
- Formal Open Space
- Link
- TW Land
- Existing Woodland
- Gladman Development Area
- Potential Link
- Potential Green Link
- 1 Hundred of Hoo (Primary 1FE with 2FE expansion capacity and Secondary)
- 2 Hoo St Werburgh (Primary 2FE)

Project
GREATER HOO, ST WERBURGH

Drawing Title
LAND USE PLAN - TAYLOR WIMPEY & GLADMAN DEVELOPMENT

Date 27.04.18 Scale 1:5,000 @ A3 Drawn by ALC Check by DS

Project No 27257 Drawing No RG-M-07 Revision B

0 50 100 150 200 250m

Taylor Wimpey (Stonebridge)				
Area	Ha	Ac	Density	Units
Residential	16.52	40.82	30	495
Potential School Extension	1.00	2.48		
Informal Open Space	9.75	24.09		
Formal Open Space	1.68	4.15		
Infrastructure	1.21	2.98		
Link (Btwn Stonebridge & Broad St)	0.35	0.86		
Total	30.51	75.38		495

Gladman Developments (Stonebridge)				
Area	Ha	Ac	Density	Units
Residential	8.19	20.23	30	245
Informal Open Space	3.23	7.97		
Formal Open Space	0.00	0.00		
Infrastructure	0.68	1.67		
Total	12.09	29.88		245

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Consultation response

for

Medway Local Plan 2012 – 2035 – Development Strategy Consultation

On behalf of

AC Goatham and Son

June 2018

 | www.bloomfieldsltd.co.uk
77 Commercial Road | Paddock Wood | Kent TN12 6DS

IN ASSOCIATION WITH

**Lambert
& Foster**



1. Introduction

- 1.1. We are writing on behalf of our client, AC Goatham and Son of Flanders Farm, Ratcliffe Highway, Hoo St Werburgh, Kent, ME3 8QE in respect of the Medway Council's Local Plan 2012-2035 – Development Strategy Consultation.
- 1.2. Our client owns land across Medway Council and also has interests in a number of sites which they have long term leases on. Within Medway the business farms over 500 acres of land for top fruit (apples and pears). In the last 10 years the business has invested over £20 million in built infrastructure in Medway to support its farming business.
- 1.3. The role of the Medway Local Plan is to plan positively for the development and infrastructure that the area needs, whilst balancing this within the context of protecting and enhancing the natural, built and historic environment.
- 1.4. The countryside is a landscape managed by those who have farmed it for generations and make it what it is today. This must be a consideration in the forthcoming Local Plan and changes in agricultural operations, scalability and the opportunity for investment and diversification to support agriculture should therefore be supported. It is imperative that when determining suitable development, regard should be had to the wider benefits offered as a result of any proposal, even when these may not directly relate to the site in question but other wider land holdings within the area.
- 1.5. Equally, it is important to recognise diversification opportunities that arise for businesses including through the change of use of land and buildings which may have become surplus to requirement and/or which are more suited to an alternative use. Especially, where this can result in reinvestment in business, people and land as a consequence, and where other wider community benefits can be derived.

2. Section 2: Vision and Strategic objectives for the Local Plan

- 2.1. At paragraph 2.4, the Development Strategy recognises that Medway's economy and skills levels are weaker than competing areas, whilst figure 2.5 comments on Medway's economy lagging behind the county and national averages, with productivity running at two thirds of the national level, whilst productivity in terms of GVA is the lowest in the South-East region (despite being the largest city in Kent and one of the largest in the South East). We therefore believe it is imperative that the Council reflects, in its Local Plan, the intention to be supportive of those businesses that are able to maintain and contribute to the growth of GVA. Especially where, in the case of AC Goatham and Son and its growing partners, current annual GVA of the business is £13.75 million. Our client therefore supports the vision that the Local Plan priorities should (as set out at paragraph 2.12) "*Maximise regeneration and economic growth*".
- 2.2. Our client supports the Council's recognition at paragraph 2.9 that growth does not mean losing character of an area.
- 2.3. The Council's aim to "*boost economic performance through supporting local businesses and attracting inward investment..*" as per 2.13 is supported.
- 2.4. At 2.15 consideration is given to promoting healthy eating and physical exercise. Whilst it is set out that planning can help contribute to healthier food environments by managing the availability of fast food outlets, acknowledgment should be given to supporting the industries/businesses that are responsible for the delivery of healthy produce, especially, as is the case with AC Goatham and Son, where it is the growing of fruit and management of the landscape that is concerned.
- 2.5. Whilst this draft Development Strategy recognises Medway being of Regional and National importance to the aggregate and energy industry, it fails to acknowledge the same status being applicable for the top fruit industry at figure 2.23. This should be amended accordingly.

3. Section 3: Development Strategy

- 3.1. Although, it was confirmed to Council members in the cover report dated 6 March 2018 (at figure 4.1) that “*The Council has not identified a preferred development scenario at this stage*”, confirming, “*It will analyse the representations made to the Development Strategy consultation and carry out further technical assessments before confirming details of proposed site allocations in the draft plan*” we note at paragraph 3.26 it is recognised that a possible option for a core component for Medway’s sustainable growth required the development of a rural town on the Hoo Peninsula.
- 3.2. The Hoo Peninsula Rural Town growth option proposes the delivery of a number of strategic landholdings in and around Hoo St Werburgh under a Masterplan-led approach (Figure 3.27). AC Goatham and Son has land located between the location of a possible railway station (as indicated at Figure 5.1 of the consultation document) and the sites identified at Appendix 1, 2 3 and 4. Appendix 3 also identifies land in the AC Goatham and Son’s ownership forming a “*site with opportunity for development subject to availability*”. Consequentially, we would duly request that our client be engaged as a stakeholder at the development stage (as opposed to just consultation stage) to comment on any masterplan being devised to develop a rural town growth option at Hoo.
- 3.3. In considering growth on the Hoo Peninsula Town Growth scenario the focus of such growth would appear to be the housing numbers rather than focusing on the existing businesses surrounding the area or employment growth and any plans they may have for their protection and growth.

- 3.4. In giving consideration to business protection of AC Goatham and Son, it is important to remember that amongst other reasons, the Council supported AC Goatham and Son's move from the centre of Hoo St Werburgh (Street Farm) to Flanders Farm to allow the business to function without hindrance or complaint from local residents about perceived levels of noise, traffic and disturbance. It is therefore vital that any considered development adjacent to our client's land is mindful of this, so as not to create a situation whereby new growth generates grievance to the operations undertaken by AC Goatham and Son.
- 3.5. Regard should also be had to AC Goatham and Sons expansion needs for their fruit grading and storage complex at Flanders Farm. This includes the requirement for additional cold storage facilities and the long-term ambition to replace the existing complex of mobile seasonal worker caravans across the business with high-end workers accommodation which could include amenity facilities. The cold stores obviously being required to support a greater level of crop production and the latter to provide quality accommodation which is sustainable and attractive to draw on the required labour needs of the business in order to ensure continued management of the landscape and the harvesting of top fruit.
- 3.6. A Masterplan approach would be a good opportunity to acknowledge further needs for AC Goatham and Son as an employer of circa 1,000 staff at high season and to embrace Flanders Farm as an identified "agricultural hub" to allow the appropriate level of protection from development which has the potential of imposing operational limitations.
- 3.7. The potential to use the Grain freight line for passengers is acknowledged at figure 3.43. With the considered locations for access to this (as indicated in Figure 5.1 of the consultation document), it is possible that AC Goatham and Son could assist in facilitating improved cycle and pedestrian access via or adjacent to their land (whilst of course having adequate regard to figure 3.7 above). This only serves to highlight the advantage to the Council for the integrationist development of any Hoo Peninsula Masterplan with AC Goatham and Son, rather than simply seeking their view after a scheme has been proposed and at far too late a stage.

- 3.8. Appendix 3 highlight locations of sites that form part of Scenario 3, with land owned by AC Goatham and Son in the form of SO2 being identified as a “*Site for opportunity for development subject to availability*”. Given the extent of land available at SO2 (and to the north) and in the same ownership, there is great benefit to be derived in the Council engaging with AC Goatham and Son during the Masterplan process understood to be forthcoming to consider appropriate development on the Hoo Peninsula.

4. Section 4: Housing

- 4.1. It is acknowledged at paragraph 4.41 that Policy H6 (Mobile Homes Parks) does not relate to specialist workers accommodation in the land-based sector and that further policy will be provided as part of the development management section of the draft Local Plan. This is obviously an important consideration for AC Goatham and Son and one they wish to reserve their position on.
- 4.2. However, it would be duly suggested that the provision of such accommodation should not necessarily be provided for in the form of caravans / mobile homes where there is an identified need for large numbers of seasonal workers to serve an agricultural need. Instead, consideration should be given to blocked accommodation which can include the provision of self-contained amenity areas and can be considered more visually attractive in the environmental and a better use of land (as the potential to increase the spread of caravans is reduced which therefore allows for a greater retention/creation of active agricultural land). It also has the potential to allows for improved levels of site management and property management.

5. Section 5: Employment

- 5.1. The consultation confirms that a core ambition of the Local Plan is to strengthen the performance of Medway's economy, securing quality jobs in the local area, capitalising on the further and higher education offer, and realising the area's potential as the largest city in Kent, enjoying a strategic location in the Thames Gateway. The Council supports opportunities to strengthen the local economy through encouraging development of businesses in successful growth sectors and diversifying the employment base as per paragraph 5.10. This ambition is supported by AC Goatham and Son.
- 5.2. Paragraph 5.10 also highlights the strengths of the economy being manufacturing and technology industries. However, we consider that the horticulture industry should not be overlooked but rather should be included within this, especially given that AC Goatham and Son have been recognised as a national industry leader in the top fruit sector, investing in cutting edge storage and packing facilities and developing innovative growing techniques and fruit tree varieties.
- 5.3. The Employment Land Needs Assessment as per paragraph 5.15 identifies that existing economic assets [of which we consider AC Goatham and Son to be one], are likely to drive future economic opportunity. Again, no recognition is given to the horticultural industry being a key component in the future industry. Given that AC Goatham and Son won Medway business of the year in 2016, Kent Chamber of Commerce Business of the Year in 2017 and at the Farmers Weekly National Farming Awards they obtained the National Farming Award for Specialist Crop Producer of the Year 2017 (the last demonstrating AC Goatham and Sons capability and contribution to the national farming arena), we consider this a key component of the future economy that should be not be overseen in support of rural business success.
- 5.4. Our client would agree with the view at 5.16 that "*Economic growth could also be driven by new opportunities created by major investment in new infrastructure*". Flanders Farm is one such example where the £10million investment in further cold store and packing facilities has led to the long-term lease of 175 acres of land on the Hoo Peninsula and further invested already worth in the order of £2.1million (for trees and irrigation alone).

- 5.5. The ability to recognise Flanders Farm as an “agricultural hub” to help meet the full range of AC Goatham and Sons business needs in the future for workers accommodation and increased storage facilities could help with the requirement of *“meeting the full range of business needs projected over the plan period”* and would contribute to the identified 90 ha of employment space required over the plan period, as per paragraph 5.17.
- 5.6. It is unclear from paragraph 5.21 (and corresponding Figure 5.1) whether the proposed *“New B1 employment site”* is proposed on, adjacent to or some distance from our client’s land. Without knowing the location of this, it is unclear what is being proposed. Our client would however welcome the opportunity to discuss this further.
- 5.7. It would appear that a large emphasis is being placed on the intention to increase the productivity of Medway’s economy as part of the Economic Development policy approach. This is supported. We note that the policy approach is to assess *“all planning applications”* for employment uses against their GVA contributions. Whilst we would support economic development that can offer GVA contributions, we would comment that the requirement to demonstrate GVA contributions for all economic development (however small) is likely to be over burdensome and problematic.
- 5.8. Whilst figure 5.24 seeks to identify the classification of agricultural land, the source of this data is not set out. Notwithstanding this, the potential to develop on different land grades must not be prejudiced by land grade alone. The need for development must also be seen in the context of a specific location having regard to the purpose it serves and the benefits derived in the wider environment.
- 5.9. Our client was pleased to see that paragraph 5.25 recognises that horticulture represents *“the most valuable agriculture sector in the region”*, whilst it potentially offers the equivalent to 11% of the national resource of top and soft fruit. In light of this, it is very important that the Local Plan reflects onward support for growth of the businesses that contribute to this. This would duly support the concept of an “agricultural hub” at Flanders Farm but also recognition that any future development at Hoo should not prejudice AC Goatham and Sons ability to function.

- 5.10. Recognition of the requirement for seasonal skilled labour at 5.27 of the consultation is welcomed, as is the acknowledgment in difficulty associated with movement restrictions. However, the consultation document does not then acknowledge the relative requirement for accommodation to overcome such matters whilst also serving the functional requirement of the land. This should be carried forward into the Local Plan. Such an example would be the recognition for improved accommodation facilities at Flanders Farm and consideration that the need for agricultural facilities are not necessarily best met through mobile homes, but other more sustainable facilities which are also able to provide corresponding amenities for improved worker welfare standards.
- 5.11. Our client is supportive of the Council's recognition at 5.28 that "*Diversification and consolidation of farming activities is an important consideration in securing the rural sector*", especially where this can generate or release equity to support the principle activity of agriculture in a business. There may for example be the opportunity to diversify the use of farm buildings or land which are no longer suitable for modern farming practices and machinery, where the land quality is diminished, orchards have reached the end of their life cycle and/or where surrounding uses would dictate a better and more appropriate land use in the context of a particular environment. Or even where, the land is surplus to requirement for a particular use and a greater public benefit can be derived from another use.
- 5.12. We are pleased to see the recognition that in forestry and farming there is often a need for supporting infrastructure that includes processing and packing facilities as recognised at paragraph 5.29. Whilst it is acknowledged that consideration of the needs of rural businesses with safeguarding the character of the countryside needs to be considered, regard must also be given to the other economic and social benefits brought about as a result of a proposal as per the NPPF. The character of the countryside must not therefore be seen in isolation.
- 5.13. Paragraph 5.30 recognises development on the Hoo Peninsula being part of the growth strategy and with this comes the requirement for specific employment land provision. Being a significant employer on the Hoo Peninsula, an opportunity exists for the Council and AC Goatham and Son to work together to build on the existing provision through protecting the existing facility and supporting AC Goatham and Son's continued growth to offer further employment potential.

- 5.14. Policy E2 on the rural economy must not just be seen in the context of the particular site in which development is proposed, but the wider benefits to the countryside and rural economy. Equally, the requirement to “*not conflict with the requirement to conserve and enhance the environment*” must not be taken in isolation and it is of course important to balance other gains that could be had to the wider community and Council in considering alternative uses of land and buildings. Especially for example, but not limited to, where agricultural land is restricted in access, surplus to requirement, poor in quality, and/or could serve a better use giving due regard to its location and the location of adjacent facilities.

6. Section 7: Natural Environment

- 6.1. Section 7 considers the approach to Landscape. It is considered important to update the Medway Landscape Character Assessment (as proposed at paragraph 7.19) before the policy on Landscape and Green Infrastructure can be considered.

7. Section 9: Health and Communities

- 7.1. We support the Council’s recognition at Section 9 that planning should support access to healthy and affordable food, including opportunities for food growth as per paragraph 9.3. We therefore consider it important that the forthcoming Local Plan better supports businesses seeking to grow and provide healthy food options and reduce dependence on food imports, such as AC Goatham and Sons. Developing an “agricultural hub” at Flanders Farm can help achieve such protection.
- 7.2. Despite the intention set out by the Council to encourage opportunities for food growth, there is no mention of agriculture at Policy HC1 or supporting facilities, such as Flanders Farm that make the provision of healthy food grown locally possible. We consider the Council should go further at policy HC1 to support producers of healthy food.

8. Summary

- 8.1. Any intended pursuit of development of the Hoo Peninsula first requires more comprehensive consideration to understand the extent of infrastructure required to meet any forecast need. Only then can an assessment be made on whether focus on the Peninsula is appropriate in principle and in what capacity.
- 8.2. As landowners and significant employers on the Hoo Peninsula AC Goatham and Son would like the opportunity, as a key stakeholder to be part of any considered masterplan process.
- 8.3. It is however welcomed news that the Council recognises the particular importance of the horticultural sector to Medway and consequentially the importance of Medway in contributing to the top fruit sector both regionally and nationally. The importance of this must be taken forward into the Local Plan.
- 8.4. It is critical that when the Council are looking at policy that impacts on the rural economy that consideration is given not just to perceived impacts and benefits at that specific site, but on the wider area, whether it be in landscape, social or economic terms.
- 8.5. It is important to recognise diversification opportunities that arise for businesses including through the change of use of land and buildings which may have become surplus to requirement and/or which are more suited to an alternative use. Especially, where this can result in reinvestment in business, people and land as a consequence, and where other wider community benefits can be derived.

From: [REDACTED]
Sent: 25 June 2018 11:32
To: futuremedway
Subject: Future Medway Development Strategy Consultation Introduction

Categories: Blue Category

Dear Sir,

TOWN AND COUNTRY PLANNING ACT 1990

With reference to the proposed planning of eighteen houses at Middle Stoke, a similar proposal for the construction of six detached houses each with a single garage and associated off road parking at Mackay's Court Farm adjacent to "Jubilee Cottages" was refused for the following reason:

MC2006/2027

1. The proposed development is outside the confines of any settlement identified in the Local Plan as being suitable or capable of accommodating further residential development. The proposal therefore represents development in the open countryside and would also fail to maintain or enhance the character, amenity or functioning of the countryside. The proposal is thereby contrary to Policies SP1, SS8, EN1, QL1 and HP5 of the Kent and Medway Structure Plan 2006 and Policies S1, BNE1 and BNE25 of the Medway Local Plan 2003.

Thus, the proposed construction of houses in this location is a clear infringement of this ruling.

Yours faithfully,

Keith Foot

[REDACTED]

From: [REDACTED]
Sent: 25 June 2018 11:41
To: futuremedway
Subject: The Local Plan

Categories: Blue Category

Dear Sir/Madam

I am writing to you regarding Medway Council's Local Plan and it's detrimental impact on the Hoo Peninsula.

My Partner and I have lived in our house in Hoo for 7 years and have had two little girls here with the expectation of raising them here as my Partner was.

She has lived in Hoo all of her life. Mum and Dad a five minute walk away, Auntie Uncle and Cousins on the next road and until recently Grandma lived on the same road. Family, friends, work colleagues and customers all form part of the Hoo community.

We all understand that places change and housing is important and so the houses that we've seen shooting up in the village in recent years have been both expected and accepted, but now it is all getting too much.

It seems that the Council expects the Hoo Peninsula to cope with more and more houses while ignoring the needs of access, services and community ammenities.

There is only one major road from the bypass all the way to Grain and with more and more traffic if this is closed or busy, the other minor roads (which are one lane in many places) will not be able to cope. There are no train services on the Peninsula which lays the full transport need directly on these already busy roads.

The plans to remove Deangate Golf Club and the Hundred of Hoo Leisure Centre will leave us with very little in the way of Community Leisure, sport or social facilities. The Hoo Institute is our last hope but is outdated and can really only cater for adult needs.

The schools are getting bigger and more subscriptions are leaving locals worried about their childrens chances of getting a local placement, especially if siblings are already at the school.

From a once Community spirited Village, Hoo is changing fast into a Town with no attributes worthy, needed or expected of a residential area of this size.

Please allow the Peninsula time to adjust to the extra demands and invest some Council funds to provide the services we need to accomodate the growing population of a Village already straining to accomodate the local residents.

There are many other areas suitable for development in the Medway area, many which would be inconvenient to the Council for "one reason or another", but this Village seems to be targetted by the people that do not have to live here and the plans have got to change.

Yours sincerely

Allan Banks



This document sets out my full evaluation and proposals as Member of Parliament for Rochester and Strood in response to the Local Plan development strategy consultation. This latest consultation document sets Medway Council's plans on how Medway could grow and develop up to 2035, and builds previous stages of consultation to which I have also responded.

My response is broken down by themes, all of which I have communicated to Medway Council since my election as MP for Rochester and Strood in May 2015. The key themes are as follows:

- Unsustainable development proposed for Hoo Peninsula
- Lodge Hill and environmental concerns
- No consideration given to land at Grain or Kingsnorth
- Little consideration given to health services
- Need for greater transport infrastructure strategy
- Plan for Chatham is not visionary

I will now proceed to set out my evaluation, concerns and proposals for each of these themes in no order of priority or importance.

Unsustainable development proposed for Hoo Peninsula:

Firstly, as I have pointed out repeatedly in written correspondence and formal discussions with officials and Council cabinet portfolio holders since 2015, I am deeply concerned that the number and geographic proposals of the 28,463 homes. As currently proposed, large areas of the Peninsula is being made available for largescale development, including the majority of Hoo, Lodge Hill and a number of our other rural villages. This amount of housing on or around our valuable greenspaces is not justified given the alternative but better favoured spaces we have in Medway, such as the likes of Capstone Valley.

As a lifelong Medway resident, it is very saddening that these important community spaces will change, as we have yet to have a strategic plan for growth in Medway and many questions remain unanswered for these proposals.

As MP for Rochester and Strood, I have had the opportunity to speak to large numbers of constituents, both on the streets and through correspondence. It is evident that the Peninsula's residents are incensed by the proposals for Hoo and the villages and feel their concerns have been dismissed and forgotten. We are talking about thousands of people, many have called Medway their homes for generations. But without little say, other than the odd opportunity to respond to a consultation, this wonderful area of our community is going to be developed because it is a large green space on a map.

Driving onto the Peninsula and through its villages show just how rural these communities are. The proposed plans for the Peninsula would change it beyond recognition. The proposals will see large parts of our green space disappear, coupled with a lack of detail around the delivery of vital services such as schools, GPs and transport. But, fundamentally, that so much of this housing will fall around Hoo brings great worry and pressures to those local people and on its struggling public services.

I want to make it clear that I and many residents do accept housing is needed, but it has to be right, sustainable and reflect a real vision for Medway's future success. However, it can only work if proposals are appropriately joined up and do not bite off more than can be chewed.

Sadly, reading the proposed development options, with particular reference to Option 4, it is clear that this is not the case. The proposal of a new rural town at Hoo is too much in too small a space. As I have proposed, development should be spaced and make use of brownfield or underdeveloped communities such as Kingsnorth and Grain, which I will come onto again shortly.

Yet the proposals to sustain thousands of homes in this Local Plan development strategy consultation lie with a train line and good will arrangements that developers will provide GP and school spaces. Unfortunately this is not strong enough for the thousands of residents in Hoo who are already facing commuter congestion, less accessible GPs and reduced school spaces compared to population growth.

I recommend an alternative approach that does not seek to create a sixth Medway town in what is already a densely populated part of the South East. This new approach should free up some of the burden of Hoo village and utilise other areas of Medway where public services and infrastructure can also be supported.

In essence, I believe putting so many of the eggs into the Hoo rural town basket will cause public service chaos and result in a whole part of our local population being isolated and alienated. To remedy this I strongly encourage an alternative fifth development option and better engagement with Hoo residents outside of the consultation

Lodge Hill and environmental concerns:

I continue to strongly object to any development at Lodge Hill and will remain passionate about protecting the natural environment which is now under threat from the development of thousands of homes at the site and in the proposed Hoo rural town.

Given the rural parts of Medway lying in Rochester and Strood, I have seen how this community has been continuously threatened by large and predacious housing developments.

Like many residents of Hoo and the Peninsula, I was saddened to see that Deangate Ridge Golf Course has been earmarked for development. This has been an important community asset since the course opened in the 1970s – it has been a place enjoyed by many local residents and has provided a safe haven for wildlife on the Peninsula. Given the course is next to Lodge Hill, a site of specific scientific interest (SSSI), any potential development of the sites will be of the detriment to the natural habitats across a wide area.

You will note that at the Development Options stage of the Local Plan consultation, Medway Council received 11,000 objections to development at Lodge Hill. With this said, I am surprised that development is still being considered in this area and feel that little consideration has been given to the extremely high number of objections put forward. Again, it is mine and many Hoo residents' feelings that they have not been consulted in depth and their concerns have again been dismissed in order to achieve the quickest fix.

These green spaces are of huge value to the people of Medway as well as other parts of North Kent. As mentioned, they are of importance to wildlife whether as breeding, nesting or feeding grounds. For the local community it is also a source of good health either as leisure space or as a counter to the decreasing air quality in North Kent.

With large green spaces and woodland being destroyed just to the west of Medway to make room for the new Lower Thames Crossing, by time we reach 2035 we will have little areas of beauty left to enjoy.

At the end of the day, there needs to be a recognition that the Plan and the Council are obliged to follow the NPPF, which clearly points to the obvious conclusions that Lodge Hill SSSI and a buffer around it should not be allocated to development. To do so in the face of the evidence risks the Local Plan being found unsound by the Inspector and would leave us back at step one or in the hands of others.

I strongly urge the Council to drop any plans to develop Lodge Hill and any area deemed important natural habitat. Dismissal of the sentiment coming out of Hoo and my recommendation to withdraw the proposal for Lodge Hill will be met with continued protest from many residents of the Peninsula who feel forgotten by Medway Council. I will also continue to liaise with ministers and officials at the Ministry for Housing, Communities and Local Government to ensure our official natural areas of importance are protected.

As a side point, I have also been concerned at the lack of public consultation events during this chapter of the Local Plan. Whilst it is appreciated that the planning service have held events on the Peninsula, none of them have been held in Hoo despite requests from the Parish Council.

No consideration given to land at Grain or Kingsnorth:

As I have briefly touched upon above, and with an emphasis on Hoo village, I am concerned that little or no consideration has been given to development at Kingsnorth or Grain.

Demolition works at Kingsnorth Power Station near completion and this provides the potential for the creation of a brand new town/village on the Peninsula. I understand that there are plans to transform Kingsnorth into a business park with the possible construction of an Amazon warehouse on site. The limited road infrastructure on Peninsula concerns me as there is currently only one road which onto and off the villages. The frequent use of HGVs will add congestion and disruption to local residents.

However, if much of these plans are going to go ahead, perhaps with road investment, then I still see strong potential for a large number of homes being built at Kingsnorth to relieve the huge numbers proposed for the Hoo rural town.

I therefore urge the Council to give greater consideration to developing parts of the former Kingsnorth Power Station site for housing, in order to relieve some of the excessive numbers earmarked for the Hoo rural town.

I have also met with Grain Parish Council who have informed me that they would be very open to further housing development in their village. It is appreciated that the gasworks have made it more difficult to build, but nevertheless, there is the potential for at least another 50 to 100 houses in Grain village.

It seems a short sighted decision not to invest in development at Grain, particularly now that there is a proposal to reopen the Grain freight line subject to Medway's success in the Housing Infrastructure Fund.

I strongly encourage exploring this option for the benefit of Grain and to once again relieve some of the pressures which will be brought to Hoo in the current proposals. Grain is a valued community and its potential should be supported rather than dismissed outright. It is also worth noting that these are residents actively seeking development in their community and I hope due consideration will be given.

Little consideration given to health services:

Another area I have attempted to engage regularly with Medway Council is around the local health economy. I have held similar conversations with the local NHS group, Clinical Commissioning Group and GPs.

It must be acknowledged by planners that life expectancy for Medway residents is lower than the average for England, 8.2 years less for men and 5.8 years for women. We are also facing a growing childhood obesity level which currently stands at 20.9% of all year 6 pupils. 12 of our neighbourhoods ranked amongst the 10% most deprived in England. Within our CCG area we will see around 1,300 new cancer cases per year and 660 deaths. This comes from a higher smoking rate, late diagnosis and long waiting times for the likes of radiotherapy compared to the national average.

There are evident problems already when it comes to accessing GPs and hospital waiting times, which make up a large proportion of my constituency post bag and is one of the standout comments from residents when I meet them on the street or at events. Appropriate access to health services is essential in any community and I believe that in Medway we are beginning to fall behind even before we build almost 30,000 homes. However, there is no evidence in the development strategy document that this is being taken as seriously as it should.

I cannot help but notice that 'health' makes up the smallest section of the Local Plan Development Strategy Consultation document. With the levels of deprivation in my constituency, health inequalities are poor and there is increasing pressure on our doctor's surgeries. I was astounded by the Medway CCG's recent decision not to place a new GP surgery on the new Rochester Riverside development and I feel that this shows a lack of strategic thinking for the future of Medway's health services. There are 1500 new homes expected in Rochester Riverside and residents would now be expected to find a local practice in central Rochester, all of which have reached maximum capacity.

Similarly, the decision to open centralised healthy living centres – whilst not a bad idea in itself – will isolate our peripheral communities from these vital services. For instance, one healthy living centre is being proposed for Strood, but as yet there are no concrete plans for any centre to service the rest of the Peninsula. This will leave a long journey for those living in Grain, Allhallows, Stoke and Cliffe, and will be particularly difficult for the elderly, disabled or otherwise less able.

If Hoo is the main location for further development, I am unclear on what assurances can be given that residents will be able to access primary healthcare services locally. Hoo St Werburgh Surgery is already at capacity and their catchment area includes the entire Peninsula. I would therefore like to see more concrete proposals for GP services on the Peninsula and what the strategy is going to be for the next 20 years, beyond plans for healthy living centres which will be unable to cope with the tens of thousands of additional residents nor provide for our other rural communities.

It is crucial this aspect of Local Plan is cemented as early as possible in order to reassure residents who are already very concerned with the current situation. While we all want Medway to succeed and be a destination on the map, it first of all has to work for local people and this means getting the basics correct.

The responses I have received over the last couple years have been disappointing and without a real plan for an additional 100,000 people which I expect to be addressed before the next stage of the Plan.

Need for greater transport infrastructure strategy:

One area I have persistently raised to Council officials and cabinet members is that around transport infrastructure which is already strained before we even increase population by up to 100,000.

The morning commute by road for many residents, including myself, is already problematic and is even worse leading to and from the M2 junctions, severely impacting the A228, A289, A229 and A2. The Medway Tunnel is often congested even outside of peak times and drivers have further difficulties around the Medway City Estate. Between 2012 and 2015 Medway experienced a growth in vehicle usage of 5.6%, which is above the national average of 4.6%.

Given this, I hear many questions from members of the public at what could be done to alleviate such pressures. One of the most common questions I hear at community events or when I meet residents on the streets is: when are we going to build a second tunnel?

Additionally, with the vast increase of new residents expected over the next 20 years and the construction of the new Lower Thames Crossing expected towards the end of the next decade, we need to be asking more strategic questions regarding our roads.

As I have mentioned above, the huge numbers expected to move to the new Hoo rural town cannot be sustained by the current road systems. It is also naïve to think that reopening the Grain freight line – whilst a welcome move – will singly solve the problem. In addition, it is concerning that this project has a sole reliance on consent of the Housing Infrastructure Bid which still has a little way to go before final approval and will not necessarily cover the whole amount needed.

Not everyone's commute can be done by rail and this one extra link will not compensate for tens of thousands more commuters. With so many vehicles needing to enter Peninsula Way via Bell's Lane or Main Road and then reaching Four Elms Roundabout, we can expect chaos unless the traffic is dispersed with smaller, spread out housing developments across the Peninsula and coupled with significant road investment over the next 20 years. The Council therefore needs to look beyond a rail link.

There is also a need for more public transport, such as buses with new routes and lobbying for more train services. These are conversations that need to be happening now but there is no evidence of this from the development strategy document. From my own conversation with some local bus companies, I understand that communication from the Council over Strood's regeneration programme has been lacking and has caused some confusion and problems. The implementation of the Local Plan is many times bigger and will require a more joined up action plan.

It is disappointing that such a major aspect of development has been skirted over in this development strategy document. The Sustainability Appraisal only refers to this necessary investment with the following:

Importantly, further development of Hoo Peninsula is dependent on stronger connections and upgrades to its transport infrastructure for sustainable economic growth through greater investment and employment opportunities.

This appears more to be a wish list or hope than a strategy. In sum, I notice that none of the most important strategic questions that ought to be asked are present, yet this is in the minds of so many residents and daily commuters.

I therefore urge the creation of a separate document detailing potential solutions to the transport infrastructure issues we will face. This ought to include a discussion about a second Medway Tunnel, road and junction widening, increased public transport, more low emission zones and a more comprehensive cycling strategy.

Plan for Chatham is not visionary:

It is well known amongst residents across Medway that Chatham town centre has been in decline over recent years. For a lifelong Medway resident such as myself this is deeply upsetting, particularly when big High Street names have continued to close their doors to Chatham and move elsewhere. This is most recently evident with the closures of Poundworld and Toys R Us and the insecure future of the likes of Debenhams.

We have now been left with a number of bargain, charity or betting stores and it feels like this area of my constituency and community has been neglected for too long. It is saddening that many constituents would now favour Bluewater or Hempstead Valley, rather than Chatham for their shopping or leisure.

However, from the development strategy document, it would appear that Chatham has merely been listed as an 'opportunity area' with further improvements to the retail space available. This looks appears to be short-sighted and does not reflect the ambitious vision we should be promoting for one of Medway's larger towns over the next 17 years.

The Local Plan also seems to contradict Medway Council's Place Strategy which was launched last week. It was mentioned that Rochester would become Medway's principal town given its cultural and historical significance. While this is welcome and Rochester's cultural and historic is a draw for people further afield, it still leaves Chatham in a state of limbo without a firm strategy to redevelop its town centre.

Given the lessening retail role that Chatham now plays in the Towns, I would argue that there is an opportunity for the redesign of the high street and town centre areas to make this a truly visionary plan which residents can be proud of for generations to come. This will require a wider redevelopment of current retail units than as proposed, and the construction of new social and affordable housing, leisure and modern retail.

This will greatly assist with the social housing shortage in Medway and will also ease pressure on the emphasis to build on Hoo. It will also go some way towards making Chatham a place for enjoyable and productive leisure alongside those already at Chatham Historic Dockyard and dockside areas.