
MEDWAY COUNCIL LOCAL PLAN 2012 - 2035 REGULATION 18 CONSULTATION

Response to Public Consultation

On behalf of
Hoo Consortium

June 2018

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**ON BEHALF OF
HOO CONSORTIUM**

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Project Ref:	27257/A5
Status:	FINAL
Issue/Rev:	
Date:	22 June 2018
Prepared by:	Tom Ashley
Checked by:	Lucy Wilford
Authorised by:	Huw Edwards

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

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

Ref: 27257/A5/TA/djg/cg/djg
Date: 22 June 2018

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1.0 INTRODUCTION

- 1.1 These representations have been prepared on behalf of a consortium of promoters with sites around Hoo St Werburgh and Chattenden (hereinafter referred to as 'the Consortium'), in response to Medway Council's (MC) Local Plan Development Strategy (Regulation 18) Consultation (LPDS, March 2018).
- 1.2 The Consortium comprises five landowners/promoters whom have agreed to work in partnership to jointly promote their respective land interests (Location Plan, Appendix A) through the emerging Medway Local Plan. By working together, the sustainable expansion of Hoo St Werburgh and Chattenden can be comprehensively planned and achieved, with infrastructure and services delivered at the appropriate times alongside housing. The Consortium members comprise:
- Dean Lewis Estates;
 - Homes England;
 - Gladman Developments;
 - Taylor Wimpey;
 - The Church Commissioners for England.
- 1.3 The Consortium's shared vision for the expansion of Hoo St Werburgh and Chattenden into a sustainable rural town. The 'core' of the rural town can be wholly accommodated on Consortium land which is located directly adjacent to the existing settlements of Hoo St Werburgh and Chattenden.
- 1.4 The 'core' Consortium rural town proposals comprise approximately 7,000 new dwellings; transport improvements including enhancements to local bus service provision linking with nearby rail services; a new expansive area of community parkland; new employment space; new retail and community facilities including new primary and secondary schools and health facilities; enhanced leisure and recreation facilities; and upgraded services and infrastructure such as high-speed broadband.

Hoo Peninsula – Further Expansion

- 1.5 As part of the emerging Local Plan the Council are exploring if further growth can be directed towards the wider Peninsula in addition to the Consortium rural town proposals. The Council have indicated that this would include the expansion of some of the smaller Peninsula villages and could also include expansion of the rural town eastwards towards the existing freight railway line.

- 1.6 As part of this emerging strategy for further expansion on the Peninsula the Council are seeking Government investment (via the Homes and Infrastructure Fund) to reintroduce passenger services on the existing railway line, including a new rail halt serving the rural town and the wider Peninsula. The Council have informally suggested that, taken together the rural town and the further expansion, could deliver circa 12,000 dwellings.
- 1.7 It important to emphasise that these representations have been prepared in support of the Consortium rural town proposals only. To this end these representations demonstrate that the rural town proposals within the control of the Consortium are deliverable in their own right and can deliver their own infrastructure.
- 1.8 A concept masterplan for the Hoo Peninsula Rural Town (HPRT) is included at Appendix B. By way of context this shows the Consortium rural town proposals and the wider Peninsula development context.

i) Purpose of the LPDS

- 1.9 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.
- 1.10 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).
- 1.11 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.

- 1.12 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.

ii) Purpose of these Representations

- 1.13 The purpose of the representations is three-fold.
- 1.14 Firstly, these representations set out the Consortium's response to the relevant consultation questions within the LPDS and the interim Sustainability Appraisal.
- 1.15 Secondly, these representations also present an updated masterplan for the HPRT (included at Appendix B). The updated masterplan has been developed in response to discursive planning and design guidance provided by Medway Council Officers over the last year. The updated masterplan has also taken account of evidence, prepared on behalf of the Consortium, concerning the employment, retail and community needs of the HPRT (included at Appendix C). In support of the updated masterplan these representations also set out the strategy for delivery of the HPRT.
- 1.16 Finally, these representations conclude by demonstrating that the HPRT, realised in accordance with the Consortium updated masterplan and delivery strategy, will deliver sustainable development as required by national planning policy, thereby helping ensure that the new Medway Local Plan is sound.

iii) Content of Representations

- 1.17 These representations are structured as follows:
- Section 2: Highlight the emerging changes to National Planning Policy, and the implications for the new Medway Local Plan;
 - Section 3: Sets out the Consortium's response to the Development Strategy Scenarios;
 - Section 4: Outlines the Consortium's response to the interim Sustainability Appraisal;
 - Section 5: Presents and explains the updated HPRT masterplan; and
 - Section 6: Concludes by demonstrating how the HPRT will deliver sustainable development.

1.18 In summary, these representations set out the following key comments in respect of the LPDS:

- 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 the Medway and prepares the Regulation 19 Draft Plan;
- Confirming the Consortium's support for the Hoo Peninsula Rural Town as the key component of the spatial development strategy (Policy DS2), emphasising that this represents the most sustainable strategic location within the Borough and reaffirming a willingness to continue working with MC to deliver a high quality, sustainable rural settlement in accordance with the emerging policy aspirations;
- 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;
- Confirms that, subject to the resolution of ecology issues to the Council's satisfaction, the Consortium supports the allocation of Lodge Hill as complimentary to the delivery of the rural town;
- Highlighting that the Consortium remains committed to the delivery of the Hoo Peninsula Rural Town, regardless of whether any additional funding is secured by MC;
- Highlighting that the Infrastructure Delivery Plan for the Hoo Peninsula Rural Town must also take account of the implications of allocation at the Peninsula villages, and that funding for any infrastructure improvements must be equitably secured.

2.0 EMERGING NATIONAL PLANNING POLICY

- 2.1 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.
- 2.2 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 anticipated¹ that the Medway Local Plan will be examined against the policy requirements of the new NPPF. It is thereby essential that MC has regard to the emerging NPPF policy requirements as it prepares the Regulation 19 Draft Plan.
- 2.3 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

- 2.4 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)"

- 2.5 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.

2.6 With regard to the three sustainable development objectives, Draft 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.”

2.7 The ‘presumption in favour of sustainable development’ is set out at Draft 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

2.8 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.

2.9 There is a continued focus on sustainably meeting development needs, with a particular focus on housing. To this end Draft 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)”.

- 2.10 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."

- 2.11 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."

- 2.12 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.

- 2.13 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

- 2.14 Para. 60 re-emphasises the Government's objective of significantly boosting the supply of homes.
- 2.15 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)

- 2.16 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"*.
- 2.17 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".

- 2.18 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

- 2.19 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.
- 2.20 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.
- 2.21 Additionally, there is greater emphasis on developer contributions 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.
- 2.22 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.

3.0 DEVELOPMENT STRATEGY SCENARIOS

3.1 The following responds to Consultation Question DS1:

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

3.2 As noted above, the proposed spatial strategy (Policy DS2) comprises a focus upon regeneration of brownfield land and the creation of a new 'Rural Town' on the Hoo Peninsula.

3.3 The Consortium are highly encouraged that the LPDS provides strong support for the 'Hoo Peninsula Rural Town' (HPRT). The Consortium supports the inclusion of the HPRT as a key component of the spatial development strategy for Medway as set out in 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..."

3.4 The Consortium consider that making HPRT a key component of the spatial development strategy is entirely in accordance with national planning policy. To this end the Consortium 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."

3.5 Within the context of the Consortium's continued strong support for the identification of the HPRT as a key component of the spatial development strategy, it is the purpose of this section to provide our comments on the different scenarios to inform the further refinement of the preferred development strategy for Medway. It is understood that these different scenarios are

not mutually exclusive, and that the preferred spatial development strategy will likely comprise a combination of different elements of more than one of these scenarios. To this end this section does not comment on indicative detail of the different scenarios, but rather the key differentiating elements, namely the approach to:

- 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

- 3.6 As noted in Section 2 above, a key change emerging from the Draft NPPF is the requirement to use the Government's 'standard methodology' to calculate Objectively Assessed Housing Need (OAHN).
- 3.7 The standard method OAHN figure for Medway is 37,143 over the Plan period, which equates to 1665 homes a year. The Consortium acknowledges that this is a large increase in defined housing need above the 2015 Strategic Housing Market Assessment (SHMA) figure of 1,281 homes per year, and that the standard method is not yet a formal policy requirement.
- 3.8 However, given that the LPDS is the third Regulation 18 consultation, and given that the Regulation 19 draft is due to be published at the end of 2018, the Consortium is concerned that the standard method OAHN figure for Medway has not been wholly accepted.
- 3.9 The Consortium considers 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.
- 3.10 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.
- 3.11 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".

3.12 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.”

3.13 The Consortium notes that this is not 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.

3.14 It is the Consortium view 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 SA.

3.15 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. The Consortium also warns 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).

ii) Funding of Infrastructure

3.16 In common with Policy DS2 and all four of the development scenarios, Scenario 2 identifies a rural town centred at Hoo St Werburgh, albeit with a slightly increased development potential. Within this context LPDS Paragraph 3.39 correctly notes:

“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.”

- 3.17 The Consortium agrees with this statement and is pro-actively engaging with the Council and key infrastructure and services providers to ensure that a robust and deliverable Infrastructure Delivery Plan (IDP) is put in place in support of the allocation. As noted above, given the emerging NPPF requirements concerning developer contributions, it will be important that the IDP is shown to be viable and the Consortium will work with the Council to demonstrate this.
- 3.18 With specific regard to transport infrastructure the Consortium notes that the Council has already secured funding, via the Local Growth Fund, to deliver significant improvement to the A289 transport corridor running from the Four Elms roundabout to the Medway Tunnel. Although the details of the improvement are emerging it is anticipated that these improvements will provide significant additional capacity to help accommodate the growth in traffic arising from the rural town. In addition, and as is discussed further in the Prime Transport representations at Appendix D, the Consortium have made significant progress in developing a sustainable transport strategy for the rural town, which will improve connectivity and address the air quality issues.
- 3.19 The Consortium also notes that the Council has sought 'additional' (Government) funding *"to invest in the improvements needed to strategic infrastructure to support growth over the plan period"* (Para. 3.40). 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 Consortium understands that the Bid has been shortlisted and will be developed over the coming months before a final decision is made on the funding award.

Rural Town Eastern Expansion

- 3.20 As noted in the introduction the Council is exploring whether additional development can be directed towards the Peninsula should the bid for Government funding be successful. The Council have informally indicated that the rural town could expand eastwards, with an additional neighbourhood accommodated on land to the east of Ropers Lane.
- 3.21 As noted in the introduction, to date the eastern expansion has not comprised part of the Consortium 'core' rural town proposals.
- 3.22 Notwithstanding this the Consortium supports the potential 'eastern expansion' of the rural town in principle. To this end the masterplan has been refined to compliment the potential eastern expansion (see section 5).

- 3.23 However, it is noted that the deliverability of the eastern expansion has not been explored in any detail by either the Council or the landowners. As such the eastern expansion is only a high-level option at this stage.
- 3.24 Further, the Consortium would also like to take this opportunity to emphasise that, given the tight Local Plan programme the Council have committed to, it is essential that the infrastructure funding process does not delay the preparation of the Regulation 19 Local Plan.
- 3.25 Notwithstanding the above, the Consortium supports the proactive approach that the Council has taken towards positively planning for growth and infrastructure delivery.

iii) Lodge Hill

- 3.26 As noted at the outset of these representations Homes England is a full member of the Consortium. Homes England has recently become owners of the former Chattenden Barracks and Lodge Hill training area site (Lodge Hill). Homes England has developed a masterplan for the site which comprises up to 2,000 dwellings, a new primary school and extensive open space and green infrastructure.
- 3.27 The Consortium considers the former Barracks site to be a well located, brownfield site, which would complement and integrate with the wider proposals for the expansion of Hoo St Werburgh. The Consortium also notes that the delivery of development of Lodge Hill would make a significant contribution to meeting the (standard method) OAHN for Medway. The Consortium thereby considers that the inclusion of Lodge Hill will provide some complimentary benefits to the development of the rural town, in terms of the provision of infrastructure and ecological mitigation. Its regeneration is an opportunity to ensure a high-quality environment for the future residents of the rural town.
- 3.28 The Consortium also recognises that the Homes England proposals include the development of some land designated as SSSI, which is subject to a high level of protection in National policy (draft NPPF Para. 173b.).
- 3.29 In response to this ecological constraint, the Consortium understands that Homes England is developing a robust biodiversity conservation strategy which will ensure that: adverse impacts upon the SSSI are avoided, mitigated or compensated for in line with advice in the NPPF; both within the site and through proportionate off-site compensation measures. It is understood that these measures have the potential to deliver net gains to the SSSI network.

- 3.30 Subject to the resolution of these ecology issues to the Council's satisfaction, the Consortium supports the allocation of Lodge Hill as complimentary to the delivery of the rural town.

iv) Accommodating Growth in the Smaller Peninsula Villages

- 3.31 The Consortium notes 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".

- 3.32 The Consortium notes 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. Notwithstanding the above it is anticipated that the Council will seek local infrastructure upgrades and improvements within the smaller Peninsula villages themselves. It will be important that infrastructure across the Peninsula is comprehensively planned, to ensure that provision within the core rural town compliments provision within the smaller villages.
- 3.33 It is noted that the 'Reforming developer contributions to affordable housing and infrastructure' consultation suggests that the S106 pooling limitation is could be removed for large strategic sites (identified in plans) so that all planning obligations from a strategic site count as one planning obligation. Should this amendment be introduced, it is suggested that this is applied to development sites across the Peninsula.

v) Summary

- 3.34 The development scenarios usefully allow the Council to explore variations to the draft spatial development strategy. In light of the analysis of the Scenarios undertaken by the Consortium, the following recommendations are made:
- 3.35 Firstly, that the Council should accept the standard method OAHN and not attempt to justify an alternative approach. Within this framework the Council should seek to meet as much as possible of the OAHN as is consistent with achieving sustainable development.
- 3.36 Secondly, that the Plan is progressed on the basis that infrastructure improvements necessary to deliver the Consortium 'core' rural town proposals can be funded by the developers/landowners and that Government funding is not required.

- 3.37 Thirdly, that the programme for the Local Plan specifically the Regulation 19 Plan should not be delayed pending the outcome of the HIF bid process.
- 3.38 Finally, whilst the Consortium are supportive of the Lodge Hill development as a highly desirable element of the HPRT, the rural town is not contingent upon delivery of the fully extent of the Lodge Hill development.

4.0 SUSTAINABILITY APPRAISAL

- 4.1 As part of the LPDS an 'Interim' Sustainability Appraisal (SA) has been prepared on behalf of the Council and was published for consultation in late April 2018.
- 4.2 Building upon the 2017 Interim SA, published in support of the LPDO consultation, the 2018 Interim SA sets out fourteen SA Objectives, set out in Table 1 below. The 2018 Interim SA also includes a comprehensive review of the baseline economic, environmental and social situation in Medway. Each of the four Scenarios are assessed against the fourteen SA objectives, having regard to the identified baseline.

Table 1 – SA Objectives

No.	Objective
1	To ensure equal access to education and skills at all levels to increase opportunities for individuals and improve Medway's future labour market.
2	To encourage suitable employment opportunities in accessible locations.
3	To establish Medway with a strong economic foundation which enables sustainable growth and competitiveness within the wider region.
4	To protect and support growth and prosperity in the town centres.
5	To conserve and enhance the existing green and open space network.
6	To protect and enhance biodiversity features.
7	To reduce our contribution to the impacts of global climate change and localised pollution.
8	To adapt and mitigate the impacts of climate change.
9	Promoting enhancing and respecting our historic/cultural heritage assets.
10	Making the best use of material assets.
11	To improve the health and wellbeing of the residents in Medway and reduce health inequalities across the borough.
12	To promote the resilience of communities by improving deprivation and promoting inclusive communities.
13	To reduce the levels, perception and fear of crime across Medway.
14	To provide a sustainable supply of housing to meet the housing requirements of the borough.

4.3 Whilst the Consortium is broadly supportive of the appraisals that have been undertaken for each of the Scenarios, a number of inconsistencies and shortcomings have been identified in respect of the assessment of the positive and negative effects of the HPRT:

- **Objective 4 (Town Centres)** – In three of the scenarios, concerns are raised regarding the impact of the rural town upon existing retail centres. The level of provision proposed at the rural town will meet the convenience goods needs of the population generated by the development.

Thereby the rural town will not negatively impact upon other centres, notably it is not anticipated that the rural town will accommodate a significant level of comparison floorspace.

- **Objective 5 & 6 (Green Space & Biodiversity)** – In all four scenarios, the rural town will deliver significant areas of new open space and significant strategic ecological enhancements and mitigation measures. The rural town will thereby contribute towards a “Major Positive” for Objectives 5 and 6.
- **Objective 7 & 8 (Climate Change Reduction and Mitigation)** – In all four scenarios the assessment suggests that the rural town will contribute towards ‘urbanisation’ and ‘net increases in energy, water and private transport use’. This is an incorrect assessment.

The scale of population growth in the period up to 2035 will necessarily require development of greenfield land, as it cannot all be accommodated on brownfield land. In the absence of a new Local Plan, this growth will still occur, but in an ad hoc, unplanned way. This would be a Major Negative in terms of climate change/pollution reduction and mitigation.

The rural town would significantly reduce and mitigate the impacts of climate change and pollution, by delivering comprehensively planned development including sustainable transport and energy reduction measures.

The rural town must be seen as a “Major Positive” when compared to ad hoc population growth.

- **Objective 9 (Historic Environment)** – The proposed rural town is largely unconstrained by heritage assets. It is thereby considered that any impacts upon the historic environment would be “Neutral” at worst.

- **Objective 10 (Material Assets)** – The scale of population growth in the period up to 2035 will necessarily require development of greenfield land as it cannot all be accommodated on brownfield land. In the absence of a new Local Plan, this growth will still occur, but in an ad hoc, unplanned way. This would be a Major Negative in terms of impacts upon material assets (landscape and agricultural land in particular).

The rural town would reduce and mitigate the impacts on landscape and agricultural land, by delivering a comprehensively and efficiently planned development: minimising land take (by accommodating some higher density areas such as town and neighbourhood centres); and minimising impacts on the most sensitive landscapes/view.

The rural town must be seen as a “Positive” when compared to ad hoc population growth in respect of Objective 10.

- **Objective 14 (Housing Need)** – Whilst it is acknowledged that the standard method housing requirement is not yet formally in place, it is anticipated that it will be formally required in advance of the publication of the Regulation 19 Plan.

The next SA must be prepared with regard to the standard method requirement. Failure to achieve the standard method requirement must be considered a “Major Negative”.

Linked to this it is clear that Scenario 3 has not been properly assessed, not least due to a lack of information. This must be remedied in the next SA.

- 4.4 A detailed review of the appraisal undertaken for each scenario has been undertaken, and is included at Appendix C.

5.0 MASTERPLAN REFINEMENT

- 5.1 In response to the Local Plan Development Options Consultation (LPDO, May 2017), the Consortium prepared and submitted the 'Hoo Development Framework Document' (HDFD) which sets out the Consortium's vision for Hoo St Werburgh, a concept masterplan and supporting explanatory commentary and preliminary strategy for delivery.
- 5.2 Following the submission of the HDFD the Consortium have actively engaged with MC to refine and develop the masterplan for the rural town further. This engagement culminated in a masterplan workshop held on 24 May 2018. The Consortium has sought to take on board principles discussed at the workshop and has updated the last development framework and the latest version is attached to these representations for the Council's information (Appendix B).
- 5.3 In support of the masterplan refinement the Consortium has also prepared several technical reports to provide robust evidence on the scale of non-residential floorspace and facilities likely to be required in support of the new rural town.
- 5.4 The updated masterplan that has emerged from this process of engagement and refinement is included at Appendix B.
- 5.5 The Updated Masterplan shows:
- 1 new Secondary School;
 - 3 new Primary Schools;
 - Expansion of the Hundred of Hoo Academy (primary);
 - 1 new Health Centre;
 - Upgrading of existing Leisure Facilities at Deangate Ridge;
 - 1 new 'Mixed Use' District Centre including 1,000sqm supermarket;
 - 3 new 'Mixed Use' Local/Neighbourhood Centres;
 - 2 new Country Parks;
 - New Informal Open Space;
 - New Outdoor Sports Pitches.
- 5.6 The following summarises the design evolution of the masterplan, highlighting the approach to mix of uses that is being taken, and the changes that have been made because of the engagement with the Council.

i) Mix of Uses

- 5.7 In support of the masterplan refinement the Consortium has sought to quantify the likely need and demand for employment floorspace, retail floorspace and social and community facilities.
- 5.8 Underpinning each of these assessments is a population model, identifying the growth of the population, by different age brackets, over the lifetime of the development. In addition, the assessments also have regard to existing provision on the Peninsula.
- 5.9 Please note that the assessments are based upon an earlier iteration of the masterplan with slightly lower assumed development capacity. Whilst this remains broadly reflective of the updated masterplan for the Consortium “core” proposals for the rural town, it is anticipated that these will be updated once the masterplan has been finalised, and informed by further liaison with infrastructure and service providers.
- 5.10 Informed by this evidence and engagement with key stakeholders, the emerging masterplan comprises a strategy for delivery of mixed-use, sustainable rural town. The following summarises the Consortium approach in respect employment, retail and social and community facilities.
- 5.11 Employment Strategy – The Consortium are committed to delivering a comprehensive mixed-use development, with a range of employment opportunities. However, the Consortium also recognises that for employment opportunities in the new Rural Town to be realised it must respond to market demands, having careful regard to the types of business already situated in the area, and those that might establish or move to the area. To this end the Consortium have undertaken an assessment of ‘employment needs’ within the context of the Council 2015 SHENA.
- 5.12 The evidence demonstrates that the development would give rise to some 3,500 economically active residents who would be likely to seek work in Medway. Whilst there are a number of important strategic employment location within the Borough which would be likely to provide many of these jobs, including the town centres but also established employment areas such as the nearby Medway City Estate, the Consortium is nevertheless committed to ensuring that B1, B2 and B8 employment opportunities are realised as part of the sustainable growth of the Hoo Peninsula.

- 5.13 As part of this, the Consortium is working up a strategy which complements the proposals being brought forward by the Church Commissioners for the expansion of Kingsnorth (outlined in representations submitted by Lichfields on behalf of the Church Commissioners), a sub-regionally important employment hub. Key to this strategy will be sustainable public transport routes which links the proposed new neighbourhoods to the existing and expanded adjacent employment areas.
- 5.14 Given the proposed expansion of Kingsnorth, it will also be important to ensure that the employment land provision within the HPRT is complementary in scale and type to the new and existing floorspace being provided at Kingsnorth.
- 5.15 The evidence also demonstrates that the HPRT development will generate significant employment opportunities (approximately 610 jobs) in respect of the services and facilities that will need to be accommodated within the town.
- 5.16 *Social & Community Infrastructure Strategy* – A key part of the vision for HPRT is the comprehensive provision of new and improved social and community infrastructure to meet the needs of new residents whilst also benefiting existing residents. The HDFS set out clearly commitments to accommodate new primary and secondary schools, primary care health facilities, sports and leisure opportunities and community facilities within the HPRT.
- 5.17 The Consortium has undertaken an analysis of existing social and community infrastructure provision in and around Hoo St Werburgh, and an analysis of the scale of population growth that is anticipated to be generated by the development to broadly forecast the need for additional facilities. These requirements are informing the ongoing master planning process which is being undertaken in close consultation with the Council.
- 5.18 Alongside this the Consortium has also had discussions directly with key service providers including the NHS and the Local Education Authority, to understand their requirements and aspirations, to ensure that these are also reflected in the ongoing master planning of the site.
- 5.19 The Consortium is keen to ensure that as far as possible services and facilities are brought forward alongside housing development, and infrastructure phasing will be set out as part of the Infrastructure Delivery Plan.
- 5.20 *Retail & Services Strategy* – The Consortium has undertaken an assessment of retail needs arising from the development, having regard to the Council's own evidence base and analysis. This is summarised in the table below.

Table 2: Summary of Retail Floorspace Supportable at Hoo St Werburgh (2037)

	Net Floorspace (sq m)	Gross Floorspace (sq m)
Main convenience store	1,651	2,359
Smaller convenience store(s)	633	791
Comparison goods units	1,518	1,898
Class A2 – A5 uses	2,039	2,718
TOTAL	5,841	7,766

- 5.21 The Consortium has subsequently had some preliminary engagement with specialist developers about the scale, type and location of retail floorspace that the market is likely to support. This is helping the master planning team develop a 'polycentric' masterplan, supporting the enhancement of the existing village centre with the creation of several new, mixed use neighbourhood centres.

ii) Updated Masterplan

- 5.22 As noted above the refinement of the masterplan for the rural town has been informed by close engagement with MC, culminating in a Council led workshop on 24 May 2018. The workshop sought to explore, in a discursive way, key issues related to placemaking and delivery of the rural town. In response to these key issues the Consortium has updated the concept masterplan for the rural town which can be used to inform the Council's further masterplanning and subsequent Regulation 19 stage of the Medway Local Plan.
- 5.23 The following seeks to explain how the key issues discussed during the workshop have been addressed through the updated masterplan, identifying where changes have been made and explaining where they cannot be accommodated.

Potential Further Eastern Expansion

- 5.24 In addition to the areas being shown as deliverable within the ownership and control of the Consortium, immediately to the east of the land being promoted by Church Commissioners of England, but also in their control, further land is available which could potentially provide additional land for new homes, and a new railway halt for passenger travel linking Hoo with Gravesend.

- 5.25 As noted in Section 3, the Consortium is broadly supportive of the proposed eastern expansion of the rural town, and the masterplan has been designed to accommodate this growth should it be necessary (although some further modelling of infrastructure implications would of course be required). It is estimated that it will accommodate circa. 1600 units.
- 5.26 Notwithstanding the above, the Consortium sounds a note of caution: a detailed capacity assessment has not been undertaken for the eastern expansion land. Further work will be required (by the Council and landowner) if this eastern expansion land is to be robustly identified in the next iteration of the Plan.
- 5.27 Thereby, the Consortium emphasises that the 'core' of the rural town remains viable and deliverable in both infrastructure and placemaking terms, without the eastern expansion.
- 5.28 It is however noted that securing 12,000 units within the rural town (and wider Peninsula) will go some way to helping the Council reach the standard method housing requirement over the Plan period.
- 5.29 Notwithstanding the potential additional development that the eastern expansion could accommodate careful consideration will still need to be given to best use of land within the rural town to ensure that the required housing trajectory for the first five years of the Plan, including the appropriate buffer, is delivered. This is considered essential to the robustness and soundness of the Plan.

Green Framework

- 5.30 As set out at para. 3.27 of the LPDS, one of the key requirements for the rural town is *"resilient and attractive green infrastructure that respects and defines the rural setting, separation of settlements and relationship to the wider peninsula"*.
- 5.31 At the workshop the Council sought to provide guidance as to how this requirement could be realised, identifying a very generous "Green Infrastructure" (GI) framework. A key aspiration of the Council's green framework is a "green link" running north/south from the Deangate Ridgeline to the Saxon Shore Way Ridgeline. This included the provision of a "green bridge" over the A228. It was also suggested that the ridgelines themselves should be protected from development by generous green corridors and open spaces.
- 5.32 Whilst the Consortium broadly acknowledges the rationale for these GI aspirations, they must be applied within the wider placemaking context. It is essential that strategic areas of open space provide a functional contribution, as well as protecting key views and providing linkages,

to be successful they must also be destinations with distinct characters, functions and attractions. Simply identifying large tracts of land as 'open space' will not create character and distinctiveness.

- 5.33 Notwithstanding the above, the masterplan has been updated broadly in accordance with the Council's GI aspirations, with a north/south green link accommodated and development kept off the ridgelines. However, the Consortium will now look in more detail at how these new areas of open space will function from a placemaking perspective and reserves the right to review the extent of these areas.
- 5.34 Furthermore, it will also now be necessary to explore the development capacity implications of the enhanced green infrastructure provision.

Deangate Ridge

- 5.35 The former Deangate Ridge Golf Course, which is owned by Medway Council, sits outside of the Consortium and does not comprise part of the Consortium's proposals for the rural town. Following the Council's decision to close the Golf Course, we understand the site is being promoted for development, and note that it is identified the LPDS.
- 5.36 Given that the land is not within the Consortium, we are unable to advise on the deliverability of development on the former Golf Course site. Nevertheless, we have sought to consider how this land could potentially be integrated within the wider masterplan. The updated masterplan (Appendix B) suggests that the land could potentially accommodate circa 400 dwellings, a new secondary school and country park.
- 5.37 Our suggested approach has been informed by our understanding of the constraints affecting the site, which are threefold:
- Firstly, as indicated by the name of the Golf Course, a ridgeline runs through the middle of the site, with almost all of this land being elevated. As discussed earlier the Council has indicated that ridgelines should be protected from development.
 - Secondly, the site is likely to provide bat interest in the form of foraging and roosting habitat. As a European Protected Species (EPS), development proposals would need to ensure populations are maintained at favourable conservation status.
 - Thirdly, and very much linked to the second point, whilst this land is outside of the SSSI it is directly adjacent and provides a supporting function in terms of ecological connectivity. It will be important that due consideration is given to the potential for indirect impacts to SSSI interest features and protected species as a result of

development of the Deangate Ridge Golf Course and other sites upon the adjoining SSSI.

- 5.38 To protect the ecological interest of the site and the adjacent designated areas, we suggest that an 'ecology protection zone' is provided along the northern boundary of the site, adjacent to the SSSI. Whilst this approach has not been informed by ecological advice, we anticipate this type of approach would help mitigate impacts.
- 5.39 To protect the ridge line, we suggest that a new country park is provided along the south-western edge of the site, connecting to the proposed north/south 'green link' (discussed at paragraph 5.31 above). Importantly the country park would provide a strategic landscape buffer, allowing for development to be sensitively accommodate on the former golf course site.
- 5.40 The Consortium considers that the Deangate Country Park would contribute significantly to creation of a 'rural' town. The Consortium notes that should the Council decide to direct development towards this site it is essential that robust evidence is provided in support, demonstrating deliverability of development in this location.

iii) Delivery

- 5.41 Whilst the infrastructure requirements of the rural town are still emerging, informed by the ongoing production of the Local Plan evidence base and further technical work being undertaken by the Consortium, the mechanism for delivery has been further refined.
- 5.42 The Consortium Members intend to prepare a joint Infrastructure Delivery Plan (IDP) for the rural town, which will be delivered through separate but co-ordinated Section 106 Agreements.
- 5.43 The key IDP line items have already begun to be identified through the refinement of the masterplan and also the Council's own updated Guide to Developer Contributions (May 2018). These are summarised in the table below.

Item	DLE	Homes England	TW	CCE	Gladman
Strategic Highways Improvements	Contribution	Contribution	Contribution	Contribution	Contribution
Public Transport Improvements	Contribution	Contribution	Contribution	Contribution	Contribution
Primary School	Contribution	Land	Contribution/Land	Land	Land
Secondary School	Contribution	Contribution	Contribution	Contribution	Contribution
Country Park (including SANG)	Land	Contribution	Contribution	Contribution	Contribution
Open Space	Land	Land	Land	Land	Land
Health Centre	Land	Contribution/Land	Contribution	Contribution	Contribution
Community Facility	Land	Contribution/Land	Contribution	Contribution	Contribution

- 5.44 The above table will inform the Heads of Terms of the individual Section 106 Agreement, ensuring the Regulation 123 pooling cap is not exceeded.
- 5.45 It is anticipated that, following further clarification of the IDP for the rural town in the lead up to the Submission of the Plan, a 'Statement of Cooperation' will be prepared and subsequently submitted for consideration at the Local Plan examination.
- 5.46 In summary, the Consortium considers that the updated masterplan effectively responds to the unique context and setting of the rural town, whilst also remaining commercially deliverable and viable.

Policy 12 Developer Contributions

- 5.47 The Consortium notes that draft Policy 12 states:

"Where demonstrated to be necessary the council will require that infrastructure is delivered ahead of the development being occupied".

- 5.48 The Consortium objects to this requirement as it has the potential to fatal undermine the viability and deliverability of developments across Medway. For simple cashflow reasons it is unreasonable to expect developers to fund infrastructure improvements ahead of occupations. This would be entirely contrary to extant and emerging National policy and guidance, notably NPPF paragraph 173 which states:

“the scale of development identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”.

- 5.49 It is important that the expectations of local communities are not unrealistically raised by a policy requirement that is highly unlikely to be achievable.

6.0 SUMMARY & CONCLUSION

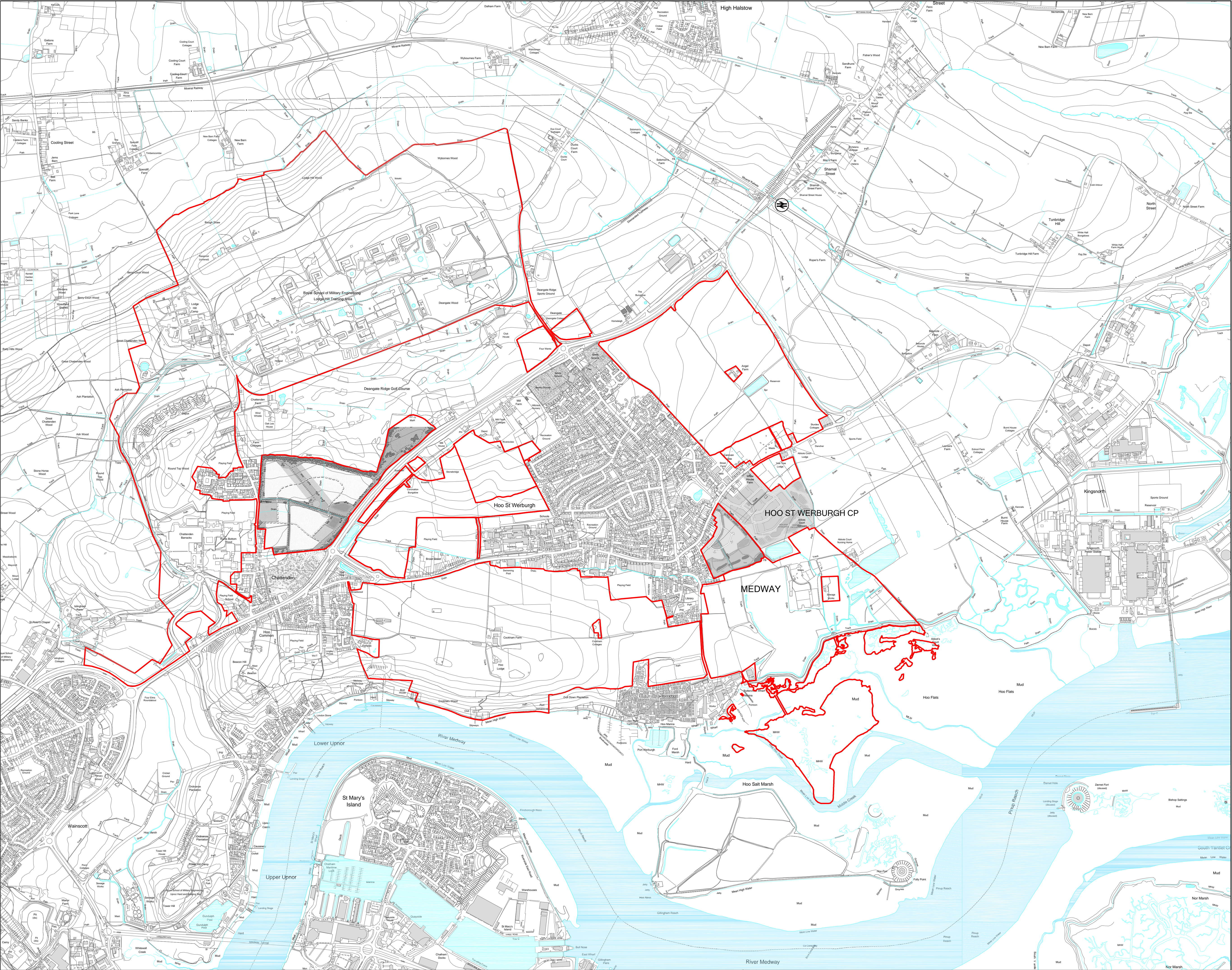
6.1 In summary (and in response to Question DS1), the Consortium welcomes the strong support for the HPRT that is set out in the LPDS, in Policy DS2 specifically. These representations have demonstrated that the rural town will deliver net gains in respect of all three sustainable development objectives:

- **Social:** Central to Medway's future success is effectively meeting Medway's acute need for housing both market and affordable. The scale of development proposed at HPRT would allow a broad range of housing needs and types to be met as required by the NPPF. In addition, the proposal for HPRT would deliver a broad range of social and community infrastructure including schools, medical centres and sports facilities.
- **Environment:** Much of the Consortium land is free from strategic environmental constraints, and where such constraints are present these can be avoided, mitigated and/or subject to compensation proposals. Whilst the Consortium recognises that the proposed rural town will necessarily change character and environment of Hoo St Werburgh and the surrounding countryside, the updated masterplan included within these representations has been designed to ensure that any locally sensitive views and landscapes or protected as part of the proposed 'Green Framework'. The Green Framework will provide a new environmental resource for the recreation and enjoyment of residents as well as securing ecological enhancements.
- **Economic:** Given the proximity of Hoo St Werburgh to the sub-regionally important employment site 'Kingsnorth' (also known as London Medway Commercial Park), and the expansion of the village into a sustainable rural town has the potential to directly contribute towards realising economic opportunities in Medway in several ways:
 - Enhanced Connectivity - The scale of development proposed would deliver enhanced connectivity from the urban area to Hoo St Werburgh, by way of new highways infrastructure and public transport links (discussed further below), which would also improve accessibility to the employment area, making it a more attractive area for businesses to locate.
 - Local Labour/Housing Opportunities – The opportunity for employees to live locally, or conversely to have a pool of labour living locally, would be attractive to businesses and would thereby make Kingsnorth a more attractive location.

- Complementary Uses & Facilities – Similarly, diversifying the mix of uses and facilities available in Hoo St Werburgh with a wider range of shops, community and leisure facilities and open space, could make working in Kingsnorth (London Medway Commercial Park) more attractive, thereby encouraging businesses to relocate.

6.2 Given these clear net gains the Consortium considers that the proposed rural town comprises sustainable development. The inclusion of the rural town as a key component within the spatial development strategy will thereby help ensure that the Plan will be in accordance with tests of soundness and the presumption in favour of sustainable development.

APPENDIX A
SITE LOCATION PLAN



The scaling of this drawing cannot be assured

Revision	Date	Dm	Ckd
A	25.06.18	ALC	NT

Amended boundary.

Consortium Ownership

Project
**GREATER HOO,
ST WERBURGH**

Drawing Title
CONSORTIUM OWNERSHIP PLAN

Date	Scale	Drawn by	Check by
25.06.18	1:10,000 @ A1	ALC	NT
Project No	Drawing No	Revision	
27257	RG-M-09	A	

DRAFT **BARTON WILLMORE**

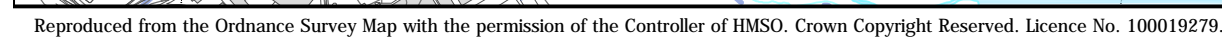
Planning • Master Planning & Urban Design • Architecture •
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APPENDIX B

CONCEPT MASTERPLAN



Offices at Birmingham Bristol Cambridge Cardiff Ebbw Vale Edinburgh
Leeds London Manchester Newcastle Reading Southampton

Offices at Birmingham Bristol Cambridge Cardiff Ebbsfleet Edinburgh
Leeds London Manchester Newcastle Reading Southampton

Existing Schools

1	Hundred of Hoo (Primary 1FE with expansion capacity and Secondary)
2	Hoo St Werburgh (Primary 2FE)
3	Chattenden (Primary 1FE)

2 Hoo St Werburgh (Primary 2FE)

3 Chattenden (Filially IFE)

APPENDIX C
SUSTAINABILITY APPRAISAL REVIEW

Table C1 - Scenario 1 - Meeting Objectively Assessed Need

No.	Score & Comments	Consortium Response
1 - Education	Neutral in Short Term moving to Minor Positive in Medium and Long Term. <i>"The Scenario supports the development of a rural town, which would result in significant investment into community infrastructure and mixed-use developments, including accessible schools".</i>	Agree.
2 - Employment	Neutral in Short Term moving to Minor Positive in Medium and Long Term. <i>"The Scenario supports the development of a rural town, which would result in significant investment into community infrastructure and mixed-use developments, including...employment sites"</i>	Agree.
3 - Economy	Minor Positive in the Short and Medium Term moving to Major Positive in the Long Term. <i>"The development of a rural town...will have indirect benefits for Objective 3"</i>	Agree.
4 - Town Centres	Minor Positive in the Short and Medium Term moving to Major Positive in the Long Term. <i>"The development of a rural town...will have indirect benefits for Objective 4"</i>	Agree.
5 - Existing Green Spaces	Neutral – Short, Medium and Long Term. <i>"The Scenario will allow high quality agricultural land and green and open space to be used in the development of the rural town and potentially for suburban expansion. The Scenario supports new developments to link into a green infrastructure network but does not mention mitigation for ecological impacts from the use of greenfield land."</i>	Disagree. Whilst it is acknowledged that the development of the rural town will result in the loss of some agricultural land, this is of very limited recreational value as it is not generally publicly accessible. Almost none of the land proposed for development comprises part of the green infrastructure/public open space network. In light of the above the proposed comprehensive green infrastructure network that will be delivered as part of the rural town, including significant areas public open space, will deliver Major Positives in the Medium and Long Term. [It is noted that landscape impacts are specifically considered under Objective 10].

6 – Biodiversity	<p>Neutral – Short, Medium and Long Term.</p> <p><i>“The Scenario will allow high quality agricultural land and green and open space to be used in the development of the rural town and potentially for suburban expansion. The Scenario supports new developments to link into a green infrastructure network but does not mention mitigation for ecological impacts from the use of greenfield land.”</i></p>	<p>Disagree.</p> <p>Whilst it is acknowledged that the development of the rural town will result in the loss of some agricultural land, this is generally of very limited ecological value.</p> <p>In light of the above, the proposed comprehensive green infrastructure network that will be delivered as part of the rural town, including the ecological enhancement of large areas of land through the formation of one or more Country Parks, will deliver Major Positives in the Medium and Long Term.</p> <p>In addition to the, it is fully anticipated that each individual development site within the rural town will mitigate any site specific ecological impacts.</p> <p>[It is noted that landscape impacts are specifically considered under Objective 10].</p>
7 – Reduce Climate Change & Pollution	<p>Minor Negative - Short, Medium and Long Term.</p> <p><i>“New developments and regeneration provide opportunities for adapting to the effects of climate change... However, the commitment to a new rural town will contribute to urbanisation and a net increase in energy, water and private transport use”</i></p>	<p>Disagree.</p> <p>The Local Plan must seek to accommodate the population growth that is forecast for Medway in the period to 2035. A failure to plan for this population growth through the Local Plan will result in unplanned, ad hoc development over the plan period.</p> <p>It is the population growth, rather than the proposed rural town which will result in a net increase in energy, water and private transportation.</p> <p>The proposed rural town actually represents a sustainable pattern of growth, e.g. allowing for more sustainable modes of transport to be designed in to the development; allowing for pollution mitigation measures to be secured from the outset of the development where necessary.</p>
8 – Mitigate Climate Change & Pollution		

9 – Historic Environment	<p>Unknown - Short, Medium and Long Term.</p> <p><i>"The protection and enhancement of Medway's heritage assets will be impacted by regeneration; however, the extent and direction of the impact will depend on the individual planning application"</i></p>	<p>Disagree.</p> <p>The analysis makes no comment on the impact of the rural town upon the historic environment.</p> <p>The Consortium notes that, in general terms the delivery of the rural town will not detrimentally impact upon the historic environment. It is suggested that the impact should thereby be assessed as neutral.</p>
10 – Material Assets	<p>Neutral - Short, Medium and Long Term.</p> <p><i>"Regarding the best use of material assets (Objective 10), the Scenario will have a neutral overall impact. This is due to a combination of support for development on both brown and greenfield sites and the corresponding positive impact on enabling best use of land and the negative impact on the landscape quality and use of agricultural land."</i></p>	<p>Agree.</p> <p>It is broadly accepted that the rural town will result in a negative impact on the landscape and use of agricultural land.</p> <p>It is however noted this is inevitable given the housing need that must be accommodated through the Local Plan.</p> <p>It is also noted that the masterplan for the rural town has been specifically designed to protect particularly sensitive views and landscapes, thereby mitigating some of these impacts.</p> <p>The overall neutral assessment is considered robust.</p>
11 – Health and Well Being	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>"Newly designed developments and regeneration projects can improve the health and wellbeing of residents through improved access to services and facilities and by encouraging a healthier lifestyle by design"</i></p>	<p>Agree.</p>
12 – Inclusive Communities	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>"Facilitating good design can also promote a sense of place and associated community infrastructure will provide opportunities for residents to become actively involved in the community"</i></p>	<p>Agree.</p>

13 - Crime	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>"Facilitating good design can also promote a sense of place and associated community infrastructure will provide opportunities for residents to become actively involved in the community. This could impact on crime and improve overall feelings of safety".</i></p>	Agree.
14 – Meeting Housing Requirement	<p>Minor Positive in Short and Medium Term moving to Major Positive in the Long Term.</p> <p><i>"The Scenario directly governs the development of housing to meet the quantum of houses required for the Objectively Assessed Need of Medway for the Plan period, providing a variety of different housing in appropriate and accessible locations to meet need and provide supporting infrastructure".</i></p>	<p>Disagree.</p> <p>The Scenario will not meet OAN (as defined by the standard method), this must be seen as major negative.</p>

Table C2 - Scenario 2 – Investment in Infrastructure to Unlock Growth

No.	Score & Comments	Consortium Response
1 - Education	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>"The supporting infrastructure required includes provision for primary and secondary schools, thereby providing benefits against Objective 1."</i></p>	Agree.
2 - Employment	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>"[Scenario 2] is actively seeking inward investment to realise this growth potential, which would increase the attractiveness of Medway for businesses and investment, contribute to accessible employment opportunities and provide opportunities for jobs."</i></p>	Agree.
3 - Economy	<p>Minor Positive in the Short and Medium Term moving to Major Positive in the Long Term.</p> <p><i>"[Scenario 2] is actively seeking inward investment to realise this growth potential, which would increase the attractiveness of Medway for businesses and investment, contribute to accessible employment opportunities and provide opportunities for jobs."</i></p>	Agree.

4 - Town Centres	<p>Minor Negative – Short, Medium and Long Term.</p> <p><i>"The Scenario would result in the creation of a new rural town and while this would enhance the existing offering of Hoo, it may increase competitiveness for other established town centres".</i></p>	<p>Disagree.</p> <p>The level of provision proposed at the rural town will meet the convenience goods needs of the population generated by the development. The rural town will not negatively impact upon other centres, notably it is not anticipated that the rural town will accommodate a significant level of comparison floorspace.</p>
5 - Existing Green Spaces	<p>Unknown - Short, Medium and Long Term.</p> <p><i>"The Scenario supports new developments which could link into a green infrastructure network, but does not detail strategies for ecological gain or mitigation against ecological loss through better management of greenfield land, or through the expansion of the rail network and associated infrastructure. The Scenario does not reference information or policy which would safeguard or enhance the green and open space network or biodiversity features. While careful management of development and integration of ecological and green infrastructure principles could result in benefits against Objectives 5 and 6, the scale of development and lack of supporting information means that the assessment against these objectives is unknown."</i></p>	<p>Disagree.</p> <p>The proposed comprehensive green infrastructure network that will be delivered as part of the rural town, including significant areas public open space, will deliver Major Positives in the Medium and Long Term.</p>
6 – Biodiversity	<p>Unknown - Short, Medium and Long Term.</p> <p><i>"The Scenario supports new developments which could link into a green infrastructure network, but does not detail strategies for ecological gain or mitigation against ecological loss through better management of greenfield land, or through the expansion of the rail network and associated infrastructure. The Scenario does not reference information or policy which would safeguard or enhance the green and open space network or biodiversity features. While careful management of development and integration of ecological and green infrastructure principles could result in benefits against Objectives 5 and 6, the scale of development and lack of supporting</i></p>	<p>Disagree.</p> <p>The proposed comprehensive green infrastructure network that will be delivered as part of the rural town, including the ecological enhancement of large areas of land through the formation of one or more Country Parks, will deliver Major Positives in the Medium and Long Term.</p> <p>In addition to the, it is fully anticipated that each individual development site within the rural town will mitigate any site specific ecological impacts.</p>

	<i>information means that the assessment against these objectives is unknown."</i>	
7 – Reduce Climate Change & Pollution	<p>Minor Positive - Short, Medium and Long Term.</p> <p><i>"[Impacts of urbanisation] could be mitigated through good quality design. The Scenario focuses on investment in the transport network, to encourage rail use and cycling as low carbon transport alternatives and encourage bus use as more sustainable travel before resorting to private car usage. The proposed sustainable travel infrastructure on the Hoo Peninsula will have a positive contribution to addressing air quality concerns, with particular benefits expected to be achieved for the A228 Four Elms Hill AQMA."</i></p>	<p>Agree.</p> <p>However, it is noted that these benefits will be realised in respect of the rural town for all scenarios.</p>
8 – Mitigate Climate Change & Pollution	<p>Minor Negative - Short, Medium and Long Term.</p> <p><i>"The Scenario supports higher density development in a rural town, which contributes to urbanisation and impacts poorly on water resilience and flood risk, which has a negative impact upon Objective 8."</i></p>	<p>Disagree.</p> <p>The Local Plan must seek to accommodate the population growth that is forecast for Medway in the period to 2035. A failure to plan for this population growth through the Local Plan will result in unplanned, ad hoc development over the plan period.</p> <p>It is the population growth, rather than the proposed (higher density) rural town which will result in a net increase in energy, water and private transportation.</p>
9 – Historic Environment	<p>Unknown - Short, Medium and Long Term.</p> <p><i>"The protection and enhancement of Medway's heritage assets will be impacted by regeneration; however, the extent and direction of the impact will depend on the individual planning application"</i></p>	<p>Disagree.</p> <p>The analysis makes no comment on the impact of the rural town upon the historic environment.</p> <p>The Consortium notes that, in general terms the delivery of the rural town will not detrimentally impact upon the historic environment. It is suggested that the impact should thereby be assessed as neutral.</p>
10 – Material Assets	<p>Minor Negative - Short, Medium and Long Term.</p> <p><i>"The Scenario will negatively impact upon Objective 10 as it encourages use of agricultural land and would also impact on the landscape".</i></p>	<p>Disagree.</p> <p>It is broadly accepted that the rural town will result in a negative impact on the landscape and use of agricultural land.</p> <p>It is however noted this is inevitable given the housing need that must be accommodated through the Local Plan.</p>

		<p>It is also noted that the masterplan for the rural town has been specifically designed to protect particularly sensitive views and landscapes, thereby mitigating some of these impacts.</p> <p>An overall neutral assessment would be more appropriate.</p>
11 – Health and Well Being	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>“Newly designed developments and regeneration projects can improve the health and wellbeing of residents through improved access to services and facilities and by encouraging a healthier lifestyle by design”</i></p>	Agree.
12 – Inclusive Communities	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>“Facilitating good design can also promote a sense of place and associated community infrastructure will provide opportunities for residents to become actively involved in the community”</i></p>	Agree.
13 - Crime	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>“Facilitating good design can also promote a sense of place and associated community infrastructure will provide opportunities for residents to become actively involved in the community. This could impact on crime and improve overall feelings of safety”</i></p>	Agree.
14 – Meeting Housing Requirement	<p>Major Positive – Short, Medium and Long Term.</p> <p><i>“The Scenario directly governs the development of housing to meet the quantum of houses required for the Objectively Assessed Need of Medway for the Plan period, providing a variety of different housing in appropriate and accessible locations to meet need and provide supporting infrastructure.”</i></p>	<p>Disagree.</p> <p>Despite directing more housing towards the rural town, the Scenario will not meet OAN (as defined by the standard method), this must be seen as major negative.</p>

Table C3 - Scenario 3 – Meeting Standard Method

No.	Score & Comments	Consortium Response
1 - Education	<p>Unknown – Short Term, Medium Term and Long Term.</p> <p><i>"This Scenario does not plan for implementation of supporting strategic infrastructure despite proposing a large number of houses to be developed over the Plan period, however it is assumed that the allocated education sites are not reallocated for housing. More information is required to make an objective assessment."</i></p>	<p>Disagree.</p> <p>The standard method housing requirement is highly likely to be implemented in the coming months.</p> <p>It is thereby essential that the Council properly seek to accommodate this requirement and plan for infrastructure accordingly.</p> <p>There is no reason why sufficient school places cannot be provided to meet the standard method housing requirement.</p>
2 - Employment	<p>Minor Negative – Short, Medium and Long Term</p>	<p>Disagree.</p>
3 - Economy	<p><i>The reallocation of employment sites for housing will have significant adverse impacts on Objectives 2 and 3 which will increase over time.</i></p> <p><i>A higher ratio of housing to employment sites will make local employment opportunities less accessible, will increase rates of out commuting and will remove growth and competitiveness from the Medway economy.</i></p>	<p>The potential detrimental impacts identified in respect of out commuting is a function of directing growth towards existing employment sites, rather than of higher housing requirement.</p> <p>The ratio of housing to employment sites could be improved by releasing more land for employment.</p> <p>It is noted that the Hoo Peninsula has a very significant employment land supply, the attractiveness of which will likely be enhanced by a large local work force.</p> <p>It is suggested that the Council update the employment land study to identify the employment land requirement resulting from the standard method OAN.</p>
4 - Town Centres	<p>Unknown – Short, Medium and Long Term</p> <p><i>"An increase in the number of residents in Medway may have positive impacts on town centres due to increased footfall, however the full effect of this is unknown".</i></p>	<p>Disagree.</p> <p>The level of provision proposed at the rural town will meet the convenience goods needs of the population generated by the development. The rural town will not negatively impact upon other centres, notably it is not anticipated that the rural town will accommodate a significant level of comparison floorspace.</p>
5 Existing Green Spaces	<p>Unknown – Short, Medium and Long Term</p>	<p>Disagree.</p>
6 – Biodiversity	<p><i>"The Scenario does not reference information or policy which would safeguard or enhance the green and open space network or biodiversity features. While careful management of</i></p>	<p>The proposed comprehensive green infrastructure network that will be delivered as part of the rural town, including:</p> <ul style="list-style-type: none"> ecological enhancement of large areas of land through the

	<i>development and integration of ecological and green infrastructure principles could result in benefits against Objectives 5 and 6, the scale of development and lack of supporting information means that the assessment against these objectives is unknown."</i>	<p>formation of one or more Country Parks; and</p> <ul style="list-style-type: none"> significant areas public open space. <p>will deliver Major Positives in the Medium and Long Term.</p> <p>In addition to the, it is fully anticipated that each individual development site within the rural town will mitigate any site specific ecological impacts.</p>
7 – Reduce Climate Change & Pollution	<p>Minor Negative - Short, Medium and Long Term.</p> <p><i>"The potential for new development could promote good design to mitigate against the effects of climate change, however the provision of housing will lead to urbanisation which increases water stress and without appropriate intervention would result in net water, energy and private transport use which contributes to poor air quality and climate change"</i></p>	<p>Disagree.</p> <p>The Local Plan must seek to accommodate the population growth that is forecast for Medway in the period to 2035 (more than likely with reference to the standard method).</p>
8 – Mitigate Climate Change & Pollution		<p>A failure to plan for this population growth through the Local Plan will result in unplanned, ad hoc development over the plan period. The population growth will still occur.</p> <p>It is the population growth, rather than the proposed rural town which will result in a net increase in energy, water and private transportation.</p> <p>The proposed rural town actually represents a sustainable pattern of growth, e.g. allowing for more sustainable modes of transport to be designed in to the development; allowing for pollution mitigation measures to be secured from the outset of the development where necessary.</p>
9 – Historic Environment	<p>Unknown - Short, Medium and Long Term.</p> <p><i>"There is no information in the Scenario about safeguarding heritage assets and conservation areas, which puts these areas at risk of impacts relating to construction and increased access and use"</i></p>	<p>Disagree.</p> <p>The analysis makes no comment on the impact of the rural town upon the historic environment.</p> <p>The Consortium notes that, in general terms the delivery of the rural town will not detrimentally impact upon the historic environment. It is suggested that the impact should thereby be assessed as neutral.</p>

10 – Material Assets	<p>Minor Negative - Short, Medium and Long Term.</p> <p><i>“The Scenario would require a mix of brownfield and greenfield sites at high densities, which would be positive for efficient use of assets in brownfield sites but negative for such use of greenfield sites. Balancing these aspects against the impacts on agricultural land and the landscape, the overall impact on Objective 10 is negative”.</i></p>	<p>Disagree.</p> <p>It is broadly accepted that the rural town will result in a negative impact on the landscape and use of agricultural land.</p> <p>It is however noted this is inevitable given the housing need that must be accommodated through the Local Plan.</p> <p>It is also noted that the masterplan for the rural town has been specifically designed to protect particularly sensitive views and landscapes, thereby mitigating some of these impacts.</p> <p>An overall neutral assessment would be more appropriate.</p>
11 – Health and Well Being	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>“Newly designed developments and regeneration projects can improve the health and wellbeing of residents through improved access to services and facilities and by encouraging a healthier lifestyle by design, however this is not explicitly promoted in the Scenario.”</i></p>	<p>Agreed.</p>
12 – Inclusive Communities	<p>Unknown – Short, Medium and Long Term.</p> <p><i>“There is a risk that inappropriate weighting towards housing and away from employment sites would increase inequalities. Through regeneration and good design of new homes, a sense of place could be promoted. However, there is also a risk that increased levels of out commuting would reduce this effect and impact negatively upon communities.”</i></p>	<p>Disagree.</p> <p>With regard to the increased out commuting it is noted that the Hoo Peninsula has a very significant employment land supply, the attractiveness of which will likely be enhanced by a large local work force.</p> <p>In addition, it is noted that any risk of increased out commuting that might arise from the slightly higher housing figure, could be mitigated by releasing more land for employment.</p> <p>Potential out-commuting should not be seen as a barrier to accommodating housing needs.</p> <p>It is noted that a failure to fully accommodate housing needs would be detrimental to inclusiveness.</p>

13 - Crime	Neutral – Short, Medium and Long Term. <i>"Overall feelings of safety could be improved by design, but inclusive communities would be more effective in ensuring this"</i>	Disagree. As noted above it is not accepted that this scenario would have detrimental impacts upon inclusiveness.
14 – Meeting Housing Requirement	Minor Positive – Short, Medium and Long Term. <i>"The Scenario directly governs the development of housing to meet the quantum of houses required for the government's Standard Method of housing provision, providing a variety of different housing in appropriate and accessible locations to meet need and provide supporting infrastructure. The Scenario aims to reach this requirement but falls short by over 1400 houses."</i>	Agree. Given that this Scenario still fails to achieve the standard method housing requirement, it is agreed that a Minor Positive is a reasonable score. Despite providing significantly more housing than Scenarios 1 and 2 this Scenario scores less well. This is entirely illogical.

Table C4 - Scenario 4 – Consideration of development within Lodge Hill

No.	Score & Comments	Consortium Response
1 - Education	Neutral in Short Term moving to Minor Positive in Medium and Long Term. <i>"This Scenario would result in significant investment into community infrastructure and mixed-use developments, including accessible schools"</i>	Agree.
2 - Employment 3 - Economy	Neutral in Short Term moving to Minor Positive in Medium and Long Term. <i>"This Scenario would result in significant investment in...employment sites"</i>	Agree.
4 - Town Centres	Minor Positive in the Short and Medium Term moving to Unknown in the Long Term. <i>"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".</i>	Disagree. The level of provision proposed at the rural town will meet the convenience goods needs of the population generated by the development. The rural town will not negatively impact upon other centres, notably it is not anticipated that the rural town will accommodate a significant level of comparison floorspace.
5 Existing Green Spaces	Neutral – Short, Medium and Long Term.	Disagree. The commentary here is very confused referring to impacts upon biodiversity

	<p>"The development would also unlock an area currently inaccessible as public open space."</p>	<p>and designated habitats and the loss of agricultural land.</p> <p>This objective should be concerned with public open space/green space.</p> <p>The scenario will result in the provision of significant new areas of public open space not previously publicly accessible. This is a major positive.</p>
6 – Biodiversity	<p>Minor Negative - Short, Medium and Long Term.</p> <p><i>"The Scenario protects ancient woodland from development pressure and direct impacts, however there may be indirect impacts from construction and increased access in the short-term and from increased access in the future. 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. These species will experience significant adverse impacts. The Scenario 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. Considering this reasoning in full, the assessment of this Scenario against Objective 6 is negative. This could be improved through an approach which commits to a comprehensive monitoring strategy that would identify adverse impacts in a timely manner, to allow further remediation or mitigation to take place."</i></p>	<p>Agree.</p>
7 – Reduce Climate Change & Pollution	<p>Minor Negative - Short, Medium and Long Term.</p> <p><i>"Development and regeneration provides opportunity to adapt to effects of climate change by design. This could increase efficiency and reduce water stress and</i></p>	<p>Disagree.</p> <p>The Local Plan must seek to accommodate the population growth that is forecast for Medway in the period to 2035 (more than likely with reference to the standard method).</p>

8 – Mitigate Climate Change & Pollution	<p><i>flood risk, however this still contributes to urbanisation and a net increase in energy, water and private transport use”.</i></p>	<p>A failure to plan for this population growth through the Local Plan will result in unplanned, ad hoc development over the plan period. The population growth will still occur.</p> <p>It is the population growth, rather than the proposed rural town which will result in a net increase in energy, water and private transportation.</p> <p>The proposed rural town actually represents a sustainable pattern of growth, e.g. allowing for more sustainable modes of transport to be designed in to the development; allowing for pollution mitigation measures to be secured from the outset of the development where necessary.</p>
9 – Historic Environment	<p>Unknown – Short, Medium and Long Term.</p> <p><i>“Medway’s heritage assets may be impacted by regeneration; however, the extent and direction of the impact will depend on the individual proposal. There is an opportunity to enhance heritage features to establish a sense of place for the community by design, especially at Lodge Hill and the rural town. The assessment of this Scenario against Objective 9 is therefore unknown”.</i></p>	<p>Disagree.</p> <p>The potential benefits arising from the rural town are noted.</p> <p>It is suggested that the assessment should be neutral.</p>
10 – Material Assets	<p>Neutral - Short, Medium and Long Term.</p> <p><i>“The Scenario supports use of brownfield and greenfield land, which contributes positively and negatively against Objective 10. While Lodge Hill is partly brownfield land, development impacts a site of high environmental value. However, there is risk of both unexploded ordnance and contaminated land on the site, which would be addressed and improved because of development. The assessment for this Scenario against Objective 10 is therefore neutral”.</i></p>	<p>Agree.</p> <p>It is broadly accepted that the rural town will result in a negative impact on the landscape and use of agricultural land.</p> <p>It is however noted this is inevitable given the housing need that must be accommodated through the Local Plan.</p> <p>It is also noted that the masterplan for the rural town has been specifically designed to protect particularly sensitive views and landscapes, thereby mitigating some of these impacts.</p> <p>The overall neutral assessment is considered robust.</p>

11 – Health and Well Being	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>“Newly designed developments and regeneration projects can improve the health and wellbeing of residents through improved access to services and facilities and by encouraging a healthier lifestyle by design”</i></p>	Agree.
12 – Inclusive Communities	<p>Minor Positive – Short, Medium and Long Term.</p> <p><i>“Facilitating good design can also promote a sense of place and associated community infrastructure will provide opportunities for residents to become actively involved in the community”</i></p>	Agree.
13 - Crime	<p>Minor Positive in the Short and Medium Term moving to Major Positive in the Long Term.</p> <p><i>“This could impact on crime and improve overall feelings of safety. The Scenario would make the Lodge Hill site safer for the public, however current site access is controlled and therefore development presents no significant increase to feelings of safety compared to the status quo”.</i></p>	<p>Agree.</p> <p>Note this objective is concerned with actual safety and perceived safety.</p>
14 – Meeting Housing Requirement	<p>Major Positive – Short, Medium and Long Term.</p> <p><i>“The Scenario provides sufficient housing at a range of locations to meet the housing demand and provide associated community infrastructure and open space. The inclusion of Lodge Hill ensures that the OAN housing targets can be exceeded, with an appropriate buffer for long term significant impacts. The additional supporting infrastructure, good design principles and masterplanning process also contributes to significant benefits against Objective 14.”</i></p>	<p>Disagree.</p> <p>Despite directing more housing towards the rural town, the Scenario will not meet OAN (as defined by the standard method), this must be seen as major negative.</p>

APPENDIX D

HIGHWAYS AND TRANSPORT REPORT

HIGHWAYS & TRANSPORTATION REPRESENTATIONS 2018
HOO ST WERBURGH LOCAL PLAN OPTIONS,
MEDWAY
CLIENT: DEAN LEWIS ESTATES, GLADMAN & TAYLOR WIMPEY



Document Control		
Job Number	P16082	
Document Version	Draft	
File Reference	N:\Projects\P16082 - Main Road, Hoo St Werburgh, Medway\7. Reports\Reps 2018	
Date	June 2018	
Client	Dean Lewis Estates, Gladman & Taylor Wimpey	
	Name	Position
Written by	David Stoddart	Associate
Checked & Approved by	David Schumacher	Director

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1 INTRODUCTION

1.1 Purpose of Report

- 1.1.1 This report considers the high-level highways and transportation implications associated with a number of potential sites for residential led development in Hoo St Werburgh, Medway. It is hoped that the sites will be allocated as part of the emerging Medway Local Plan.
- 1.1.2 Collectively, the sites total circa 6,500 dwellings along with employment land (B1/B2/B8), potential secondary school, potential primary schools, retail and community use. These sites are in addition to the 2,000 dwellings plus other land uses proposed as part of the Lodge Hill development.

1.2 Scope of Report

- 1.2.1 This report will first outline the existing situation in Hoo St Werburgh and the Medway Peninsula in terms of sustainable travel, specifically walking, cycling and public transport, and road infrastructure. It will then identify any shortfalls in terms of the existing provision and provide initial recommendations in terms of public transport services.
- 1.2.2 As the sites progress through the local plan, Prime Transport Planning and the land owners and their agents will work with Medway Council (MC) to provide more detailed solutions where necessary.

2 EXISTING HIGHWAY INFRASTRUCTURE & PUBLIC TRANSPORT PROVISION

2.1 General

- 2.1.1 Hoo St Werburgh is located on the Hoo Peninsula, Medway. The area is a true peninsula with the towns of Wainscott, Strood, Rochester, Chatham and Gillingham to the south-west, the River Thames to the north, the River Medway to the south and the English Channel to the east.

2.2 Wider Highway Network

A228

- 2.2.1 The A228 is the primary strategic route through the peninsula. It is the primary distributor road connecting the settlements of Grain, Stoke (Upper, Middle and Lower), Allhallows, St Mary Hoo, High Halstow, Hoo St Werburgh and Chattenden to the A289 at the Four Elms Roundabout at Wainscott.
- 2.2.2 The A228 is a two-lane dual all-purpose carriageway between Four Elms roundabout and Ropers Lane where it then becomes a single lane non-dual carriageway. Residential frontage is limited with the A228 providing a road rather than street function. The majority of its junctions are large roundabouts.

A289

- 2.2.3 The A289 functions as a semi ring road around Strood and Wainscott running from junction 1 of the M2 in the west to Gillingham through the Medway Tunnel. Like the A228, it is strategic in nature, with limited frontage and functions as a road rather than street. Its junctions to the east and south of Wainscott are large roundabouts, some with left lane separation, while the junctions to the west are grade separated. The A289 connects to the A228 south of Wainscott which connects to the A2 in Strood town centre.

Strategic Road Network

- 2.2.4 The nearest connections to the strategic road network (SRN) are junctions 1 and 2 of the M2 to the west of Strood. Prime are aware that Highways England (HE) have some concerns with the operational capacity and safety of both junctions and junction 3 further south particularly given the level of growth forecast in Medway and Kent. Following a discussion with HE, the slip roads at junction 1 are understood to be sub-standard based on modern highway design standards.
- 2.2.5 HE is currently progressing the proposed Lower Thames Crossing (LTC) with the preferred route announced on 12th April 2017. This route, Option C, will connect the A2 from a new junction east of Gravesend to the M25 at a new junction between junctions 29 and 30 via a bored tunnel under the

River Thames. A section of this route, known as the western southern link, will connect the A2 at Thong to the A226 south of Gravesend which can be reached via the A289.

- 2.2.6 The planning application is due to be submitted in 2019 with the Development Consent Order expected late 2020 or early 2021. The LTC is expected to be open to traffic in 2027.

2.3 Local Highway Network

- 2.3.1 There are two local distributor roads that connect Hoo St Werburgh to the A228, both of which form a junction in the village centre. Main Road runs to the west of Hoo while Bell's Lane runs to the north. The speed limit of both roads is 30mph in the vicinity of the settlement with traffic calming in the form of raised crossings and build-outs on Main Road and priority chicanes on Bell's Lane.
- 2.3.2 Both roads provide residential frontage as well as collecting traffic from minor residential roads and other accesses. The majority of junctions are priority controlled with some mini-roundabouts also present.
- 2.3.3 Stoke Road runs north-east from the town centre to Stoke via Kingsnorth. The road is somewhat rural in nature but it does provide frontage access to properties and side roads in the vicinity of the village.

Walking

- 2.3.4 Within Hoo, streetlighting is present and footways are also provided though they are somewhat intermittent. There are sections north of the recent Bellway development on Bell's Lane where footway is not present on one side but it would appear that footway could be provided in the highway verge. Footways along Main Road are more contiguous although there are several sections where they narrow to less than the preferred minimum width of 2m, some of which are due to building constraints while others are caused by street furniture such as streetlighting, signage and guardrails. There may be scope to improve the width of some of these sections. Dropped kerbs and tactile paving are largely provided where they would typically be required, such as across junctions and on crossing desire lines.
- 2.3.5 Footway on Stoke Road is present on the southern side but is intermittent on the northern side.
- 2.3.6 In addition to the footways that run alongside the highway, there is a network of off-road footways. There are a number of off-road footways within the settlement that enhance connectivity between residential areas, notably a footpath that runs from Stoke Road to the A228 to the east of the existing residential areas which afford connection to it. Outside of the settlement there are extensive public rights of way that offer leisurely walking routes as well as convenient connections to neighbouring settlements including Chattenden. The Saxon Shore Way is a coastal walking route running south of Hoo St Werburgh connecting the village to Upnor and provides an alternative route to the A228. The majority of these are unsurfaced but could be upgraded as part of the development proposals, particularly those that run through the proposed allocations.

Cycling

- 2.3.7 Cycling facilities in terms of cycle lanes and other facilities in and around Hoo St Werburgh are fairly limited but the volume of traffic on the local roads is generally conducive to cycling. Main Road and a section of Stoke Road form part of National Cycle Route (NCR) 179 which is a circular route connecting Chattenden, Hoo St Werburgh, High Halstow, Cooling, Cliffe and Cliffe Woods to NCN 1, a long-distance route running between Dover and the Shetland Islands. NCN 179 is also known as the Heron Trail and runs largely on-road although there are traffic-free sections between Chattenden and NCN 1 and between Stoke Road and High Halstow.
- 2.3.8 2011 Census Method of Travel to Work (MTW) data has been interrogated to ascertain where the most popular workplace destinations accessible by cycling are as it is expected that cycling demand from the proposed dwellings are likely to be similar with the exception of the employment proposed as part of the allocations. Over 50% of the mid-level super output area (MSOA) cycling trips from the MSOA that includes Hoo St Werburgh have destinations on the Peninsula. Several of these destinations such as Chattenden and High Halstow can be reached via NCR 179, while other destinations can be reached using local roads but with the high speeds along the A228 not particularly conducive to cycling. Close to 40% of the local cycling trips have destinations in the Medway towns and workplaces to the south-west with half of these trips being to/from the MSOAs that contain Medway City Estate and Wainscott. These destinations are within nationally recognised acceptable cycling distances.
- 2.3.9 Figure 1 in Appendix A is an isochrone showing the areas accessible within 2km and 5km catchments. The figure shows that the whole of Hoo is within the 2km catchment while Chattenden, Kingsnorth, High Halstow, Lower Upnor and parts of Wainscott are within the 5km catchment. The towns just outside of the 5km catchment including Strood, Rochester and Chatham may be within a reasonable cycling distance for some future residents, with 8km commonly seen as being an acceptable cycling distance particularly if future cycling routes are safe and convenient.

2.4 Public Transport

Bus & Coach

- 2.4.1 A summary of the existing bus services in Hoo St Werburgh is provided in Table 2.1 below with the corresponding routes shown in Figure 2 in Appendix A.

Table 2.1: Summary of Existing Bus Services (as of May 2018)

Bus Service	Route	Weekday Period			Weekend	
		AM	Inter Peak	PM	Sat	Sun
1 - Farleigh Coaches (School)	Hoo-Rochester-Aylesford-Larkfield-Holmesdale Tech College	1/day			0	0
6/7/9/10 - Arriva (School)	Hundred of Hoo Academy-High Halstow-Allhallows-Grain	4 services	0	3 services	0	0
191/193/796 - Arriva	Grain-Allhallows-Hoo-Rochester-Chatham-Gillingham	2/hr	3/hr	2-3/hr	2-3/hr	1/hr
601 - Nu-Venture (School)	Cliffe-Lodge Hill-Hundred of Hoo Academy	2/day			0	0
689 - Arriva (School)	Earl Estate-Hundred of Hoo Academy	1/day			0	0
692 - Arriva (School)	Lower Stoke-Allhallows-Hoo-Rochester Grammar Schools	1/day			0	0
761/762/765/766 - Clarkes of London	Kingsnorth-Allhallows-Hoo-Strood-Snodland-London	7-8/day			0	0

- 2.4.2 The 191 operated by Arriva is the main service on the peninsula providing two to three services per hour between Gillingham and Grain on weekdays, two to three services per hour on Saturdays and one per hour on Sundays. The 191 service also provides connection to the University of Greenwich Medway Campus and Rochester and Strood train stations, the latter via a short circa 500m walk. The 761/762/765/766 coach services provide 7-8 services to/from central London during weekday commuter peaks. Dedicated school services also run during term time.
- 2.4.3 A bus catchment plan has been produced for direct services leaving Hoo between 7-9am on weekdays and is shown in Figure 3 in Appendix A. This shows that High Halstow, Chattenden, Wainscott, Strood and Rochester train station are accessible within a 15-minute journey time, the centre of Rochester and Allhallows in a 15-30-minute journey time, Chatham, Stoke, Wouldham and Grain in a 30-45-minute journey time and St Mary's Island, parts of Gillingham, Eccles and Aylesford in a 45-60-minute journey time.
- 2.4.4 A coach catchment plan has also been produced for direct services leaving Hoo between 5-9am on weekdays and is shown in Figure 4 in Appendix A. This shows that Bexley can be reached in a 40-60-minute journey time, Canary Wharf in a 60-80-minute journey time, City of London in an 80-100-minute journey time and Westminster and Victoria Station in a 100-120-minute journey time.
- 2.4.5 Whilst the current bus and coach service provision is appropriate for the peninsula, it is clear that services will need to be enhanced in order to encourage the use of this sustainable mode of travel.

- 2.4.6 The 2011 Census MTW data for the local MSOA has been examined which shows that close to 50% of bus trips are made to/from London with around 43% to/from Medway. It is likely that, with the exception of the new jobs that will be created as part of Local Plan employment allocations, the potential residential allocations will follow these patterns, therefore bus and coach trips to/from these destinations will need to be enhanced.

Rail

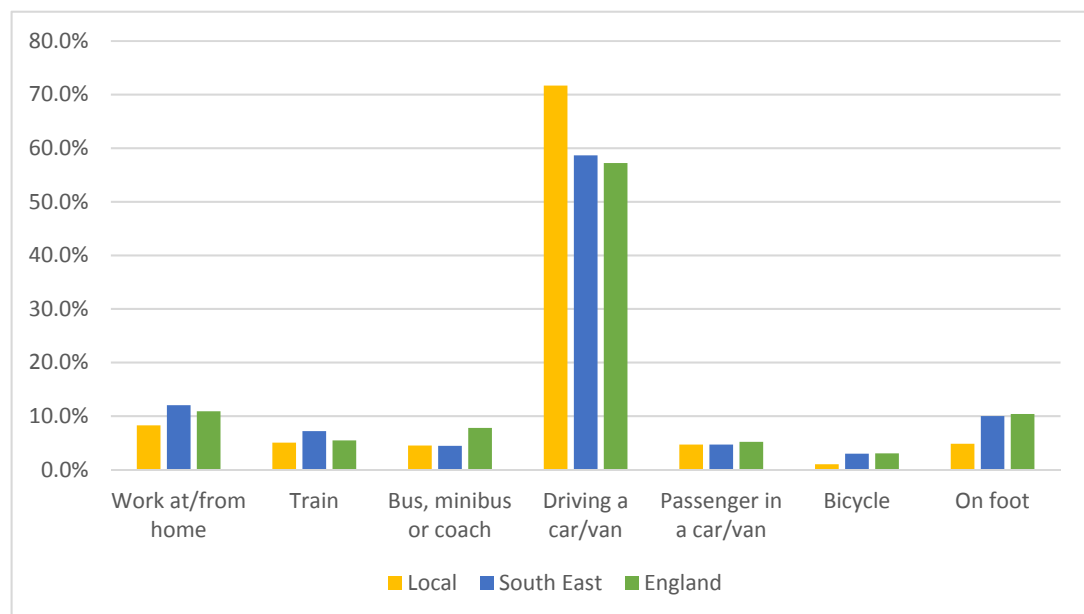
- 2.4.7 Much like the neighbouring Kent area, Medway benefits from high quality and high speed rail services. Strood and Rochester stations are in close proximity to each other, around 4.5 miles south-west of Hoo St Werburgh. Both stations are operated by Southeastern and on the same line. They offer direct connections to London St Pancras International, Gillingham, Ramsgate and Faversham, while Strood also provides services to Tonbridge, Charing and Maidstone with Rochester providing services to London Victoria and Dover Priory.
- 2.4.8 Both Strood and Rochester stations can be reached in around 20-minutes by bicycle with the former having 48 secure cycle parking spaces and the latter 24. These stations are also accessible by car which can still be considered to be sustainable if as part of a longer journey, but particularly as a car share trip.
- 2.4.9 A rail catchment plan has been produced for direct services leaving Strood station between 7-9am on weekdays and is shown in Figure 5 in Appendix A. This shows that Higham, Cuxton and Halling stations can be reached in a 0-15-minute journey time, Gillingham, Snodland, Maidstone, Gravesend and Ebbsfleet in a 15-30-minute journey time, Dartford, Woolwich, Stratford, Finsbury, St Pancras, Watlingbury (Kent), Sittingbourne and Faversham in a 30-45-minute journey time and Greenwich, Sidcup, Tonbridge, Whitstable and Swalecliffe in a 45-60-minute journey time.
- 2.4.10 While employment opportunities will be generated by potential Local Plan allocations as well as existing opportunities at Kingsnorth Business Park and the Medway towns, a fairly high element of employment demand will be to/from London. This is evident from examination of 2011 Census MTW data for the local MSOA which showed that over 85% of rail trips were to/from the capital. Strood and Rochester stations offer a journey time of roughly 30-45 minutes to London St Pancras with four services per hour from Strood and two per hour from Rochester. Shorter journey times, higher frequencies and lower fares will be available from Gravesend and Ebbsfleet stations, however these are 9.5 and 13.5 miles from Hoo St Werburgh respectively, which when compared to the two local stations that are only 4.5 miles away, their appeal is likely to be more limited.
- 2.4.11 Clearly convenient, and preferably sustainable, connections to the local train stations will be essential to support the potential allocations.

3 FORECAST DEMAND

3.1 Existing Modal Split

3.1.1 When forecasting the likely travel demand associated with the potential allocations, it is important to consider the likely modal split across all likely modes of transportation for both residential trips and employment trips. 2011 Census MTW data has been interrogated for the local MSOA and the most common modes of transportation have been compared to the equivalent modes in the South East and England. The proportion of trips by each mode is shown in Chart 3.1 below.

Chart 3.1: Existing Modal Splits for Local MSOA, South East and England



3.1.2 The local MSOA which contains Hoo St Werburgh has a notably higher proportion of car/van use than both the region and the country. Car use accounts for almost 72% of the trips made locally by the modes listed which compares with 59% and 57% for the South East and England respectively indicating a high level of car dependence. Travel on foot and bicycle are notably lower than the region and country with working at/from home also being lower.

3.1.3 It will be important, in the interests of sustainable travel, for the potential allocations to ensure that transportation mode patterns are more in line with the region and country rather than the existing patterns. Careful land use planning and promotion of sustainable modes of transportation will be essential in order to achieve this. However, it should be remembered that the peninsula nature of the area and distance from potential workplaces may limit the effectiveness of walking and cycling for commuting trips. This places a greater importance on the need for high quality public transport links.

3.2 Existing Trip Patterns

- 3.2.1 Given the peninsula nature of the area, it is clear that the majority of new trips by car, public transport and bicycle will be to/from areas to the south-west of the peninsula and beyond. This is demonstrated by Table 3.1 below, which summarises the workplace trips by each mode recorded in the 2011 Census that will have an origin/destination outside of the peninsula.

Table 3.1: Trips External to the Hoo Peninsula

Mode	%
Car	81.6%
Bus	93.6%
Train	100.0%
Bicycle	47.5%
All Modes	83.3%

- 3.2.2 The figures above demonstrate that there is currently very little containment of trips on the peninsula which is indicative of the limited employment opportunities currently available locally.
- 3.2.3 The workplace destinations in the census data have been considered. Trips to/from the South East and London account for over 97% of all commuter trips to/from the local MSOA with 50% to/from Medway, 21% to the local authority districts of Dartford, Gravesham, Tonbridge and Malling and Maidstone while trips to/from London account for 19%.
- 3.2.4 The Department for Transport's (DfT) National Travel Survey reported that in 2015, the average length for commuting trips in England was 9.2 miles. Given that of the areas listed above, only Medway and some of the outlying areas of the local districts are within this distance, indicating that almost half of local residents commute to/from workplace destinations a greater distance than the national average, with some of these, particularly London, being considerably further away.
- 3.2.5 Provision of new employment areas will help to contain some traffic to the Peninsula but it should be recognised that there will still be a considerable demand for long-distance commuter trips, with rail commonly recognised as being the most sustainable mode of transportation for such long-distance trips. Therefore, integration with and ease of access to existing and future rail services will be essential.

3.3 Vehicular Demand

- 3.3.1 It is understood that MC have developed a strategic traffic model of Medway to understand where capacity limitations exist on the highway network. Apparently, this work has assessed the impact of the Local Plan development but without any mitigation measures or improvements to public transport.

3.3.2 According to the Strategic Transport Assessment: Development Strategy Technical Report 2, dated 8th March 2018 produced by Sweco and Fore Consulting on behalf of MC, key locations where capacity would be exceeded include:

- M2 Junctions 2 and 3;
- M20 Junctions 6 and 7;
- Several junctions along the A2, particularly in Strood and Chatham town centres; and
- Several locations along other key routes including the A228, A231, A249, A278 and A289.

3.3.3 The abovementioned report goes on to state that many of these junctions are already operating at, or close to capacity.

4 PUBLIC TRANSPORT ENHANCEMENT

4.1 Introduction

- 4.1.1 As stated previously, high quality public transport provision will be required to support the emerging Local Plan growth. National transport planning policy centres on the importance of sustainable transport. Whilst improvements to walking and cycling facilities will be important to the allocations, adequate public transport provision will be essential, particularly given the longer than average distance people on the peninsula travel to work. If the allocations adopt the same modal split as the existing area, with private car use being far in excess of the national average, the level of growth proposed would arguably be unsustainable.

4.2 Bus Provision

- 4.2.1 In acknowledgement of the importance of the need for a public transport led strategy, Prime met with representatives of Arriva, the main operator on the peninsula, on 28th February 2018, to inform them of the proposals and to gauge their initial view on supporting the level of development proposed.
- 4.2.2 Arriva acknowledge their importance to the development proposals and are willing to work with the developers and MC to ensure that a suitable level of bus service provision is made available to not only address the potential level of demand, but to encourage further uptake of bus travel for existing residents.
- 4.2.3 Arriva understand the long-distance nature of commuting trips to/from the peninsula and respect the need for convenient interchange with National Rail services. They provide *Fastrack* services to Temple Hill, Dartford, Darent Valley Hospital, Bluewater, Greenhithe, Ingress Park, Swanscombe and Ebbsfleet International Station, accessible from Gravesend as part of a rapid transit system, but feel that such a system would be difficult to implement on the peninsula. Arriva also felt that more local services would be preferable for passengers and believe that Strood station would be the most suitable to connect to given the high-speed services to London St Pancras as well as frequent services to Maidstone and Tonbridge.
- 4.2.4 In respect of serving the development within Hoo St Werburgh, Arriva have suggested the following improvements to facilitate access by public transport to the whole development. This has been derived to support the phased implementation of the development and considers 3 scenarios, 2,000 dwellings, 4,000 dwellings and the full 6,500 dwellings. The suggestions outlined below were made by Arriva in an e-mail dated 22nd May 2018 but can be summarised as follows.

Current Service

- 4.2.5 As demonstrated in Table 2.1, the 191 is the most frequent bus service connecting Hoo St Werburgh to the remainder of the peninsula. This has broadly a 20 minute frequency connecting Hoo to

Strood, Rochester and Chatham. The service from Hoo to Grain, and Chatham to Dockside and Gillingham are likely to be separated from the core Chatham – Hoo section of the 191 in the near future to aid reliability. It is understood that Arriva's preference would be to focus all of the resource into one very high quality core route, this generating the best opportunity for modal shift onto the bus service. It will provide fast and frequent links to Strood, Rochester and Chatham. The following levels of service provision will serve both local and more longer distance needs.

Improvement to Serve 2,000 Dwellings

- 4.2.6 It is understood that the first improvement would be to enhance the frequency from 20 minutes to every 15 and to extend the service to take in all of the development areas, as an extension of the existing 191 service. This would require 2 additional vehicles and the annual cost would be about £320k based on today's cost-base. Arriva have suggested that this should be commercially viable at 2,000 homes occupied.

Improvement to Serve 4,000 Dwellings

- 4.2.7 The second improvement would be to enhance the frequency to every 10 minutes, splitting at the development into two loops, one clockwise, and the other anticlockwise, each operating at every 20 minutes. This should both cater for the local movements, and movements to Strood, Rochester and Chatham. This would require a further 2 additional vehicles and the annual cost would be about £320k based on today's cost base. This level of service should be commercially viable at 4,000 homes occupied. Figure 6 in Appendix A shows indicatively how these loops will operate.

Improvement to Serve 6,500 Dwellings

- 4.2.8 The third improvement would be to enhance the frequency to every 7/8 minutes, using the same service pattern as the second improvement. This would require a further 2-3 vehicles and the annual cost would be £320-480k based on today's cost base. This level of service should be commercially viable at 6,500 homes occupied.

Improved Bus Priority Measures

- 4.2.9 It is understood that Arriva have based the calculations above on existing running times, and the key to making the bus attractive for passengers is at least maintaining existing running times, and ideally improving them. Arriva have suggested that in the last 5 years on the 191, average bus speeds have fallen by more than 10% across the day, and considerably more at peak times. This both adds cost to maintaining the same level of service, but also makes the service less attractive to passengers, impacting on revenue. Bus priority measures are key to making this development work.
- 4.2.10 On the 191 route, the key locations for priority are:
- Four Elms Roundabout;
 - Roundabout joining Wainscott Rd and Frindsbury Rd; and

- The corridor through Strood, Rochester and Chatham.

4.2.11 It is understood that the corridor through Strood, Rochester and Chatham is served by 12 buses an hour at the moment, and the enhancements mentioned above will see the number of buses on that corridor increase to 17. Arriva tell us that they already struggle with keeping buses free flowing along the Strood, Rochester and Chatham corridor and suggest that this should be converted to a bus priority corridor.

4.3 Rail Provision

4.3.1 It is understood that a bid for £170m funding through the Housing Infrastructure Fund (HIF) has been made by Medway Council., this could allow for growth in the area to 12,000 dwellings. As part of that bid, funding has been sought for the conversion of a single track freight rail line that runs to the north of Hoo St Werburgh to passenger services with a new rail station being provided to the east of the town. It should be noted that the delivery of this new rail infrastructure would be an added benefit to the existing and potential residents of the town, but as can be seen from the information provided by Arriva, an enhanced 191 service can adequately serve the Local Plan development at Hoo St Werburgh.

4.3.2 The proximity of Strood and Rochester stations to the 191 route would also be a viable interchange point. In addition to bus connectivity, Strood and Rochester stations are within a reasonable cycling distance to Hoo St Werburgh and measures to encourage cycling, such as new cycleways and additional cycle storage facilities at the local train stations, can be considered.

5 SUMMARY AND RECOMMENDATIONS

5.1 Summary

- 5.1.1 This document has been prepared to provide initial advice on the highways and transport planning strategy required to facilitate the development of circa 6,500 dwellings and other land uses in Hoo St Werburgh. The HIF bid could allow for up to 12,000 dwellings to be delivered.
- 5.1.2 The existing local and strategic highway network has been considered for both vehicular and non-motorised users as has public transport provision.
- 5.1.3 Existing travel patterns, particularly to work, have been identified using 2011 census data and compared with regional and national ones. The Hoo Peninsula clearly has unique travel characteristics that differ from the rest of the country and the region. These characteristics are primarily as a result of the peninsula nature of the local area and, while there is scope to encourage the use of more sustainable modes of travel through provision and encouragement and reduce the need to travel through careful land-use planning, there will always be a high demand to/from the other Medway towns and London.

5.2 Recommendations

- 5.2.1 At this stage, it is possible to identify some initial highways and transport planning requirement to facilitate the development. These are listed below in order of importance from most important, based on our opinion:
1. Work with Arriva to deliver 7/8-minute bus frequencies between Hoo St Werburgh and:
 - Strood and Rochester train stations;
 - Strood, Rochester, Chatham and Gillingham town centres; and
 - the University of Greenwich Medway Campus.
 2. Provide bus priority measures along A228 potentially in the form of bus lanes along links and bus gates at junctions;
 3. Provide new bus route stops internal to the development sites;
 4. Provide cycle lanes and greenways where possible;
 5. Provide cycle parking at key destinations within Hoo St Werburgh to supplement the provision of cycle lanes and greenways;
 6. Potentially upgrade the Saxon Shore Way to provide a traffic free cycle route between Hoo St Werburgh and Upnor as an alternative route to the A228;

7. Provide additional secure cycle storage at Strood and Rochester train stations;
 8. Incorporate traffic free walking and cycling routes internal to the development sites;
 9. Provide new footways in existing highway verges that lack them in Hoo St Werburgh and de-clutter existing footways;
- 5.2.2 Integration with Lodge Hill and its transport strategy.

APPENDIX A

FIGURES

Figure 1 – Cycling Isochrone

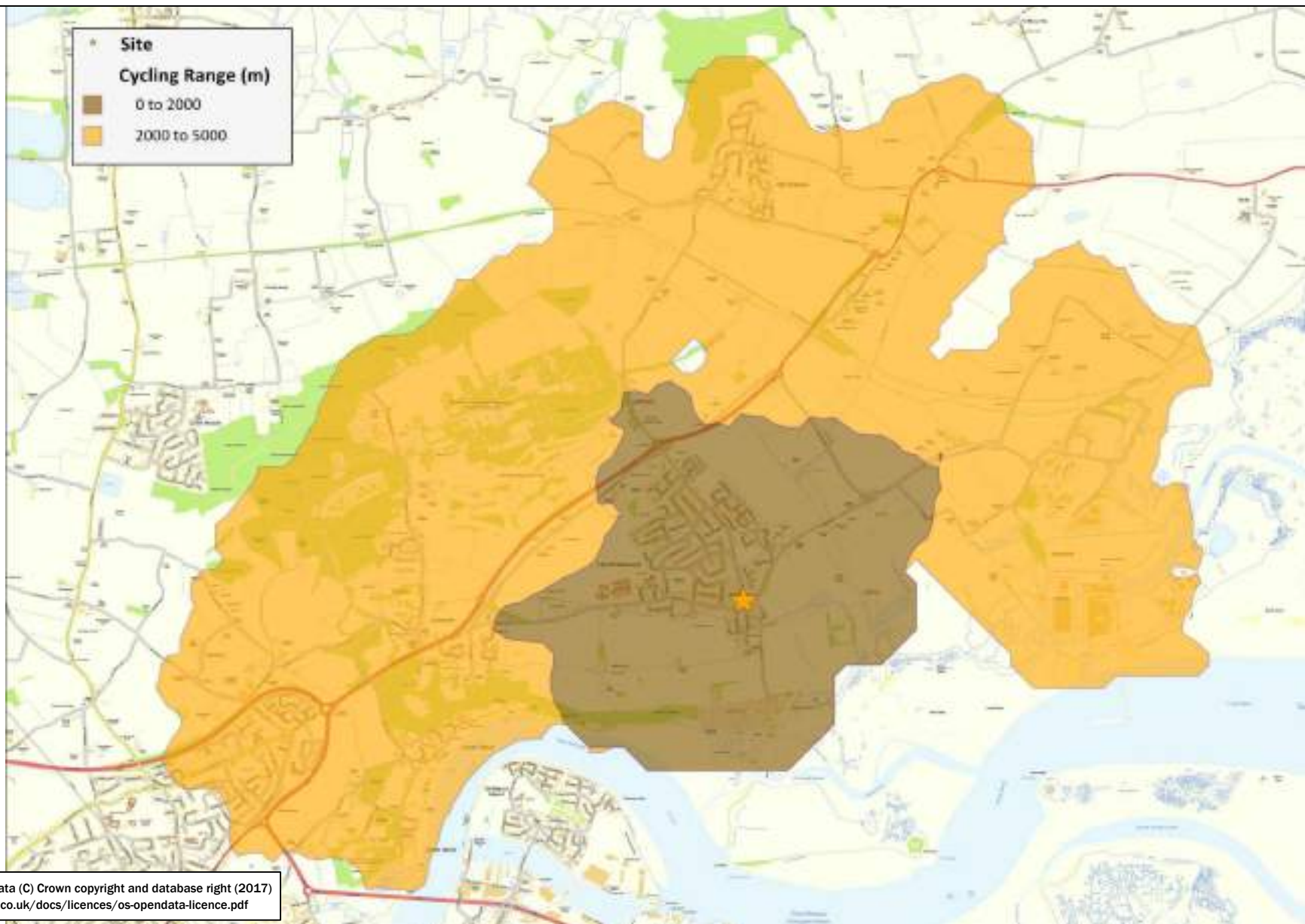
Figure 2 – Existing Bus Routes

Figure 3 – Bus Catchment (AM Peak Period)

Figure 4 – Coach Catchment (AM Peak Period)

Figure 5 – Rail Catchment Plan (AM Peak Period)

Figure 6 – Bus Routing Improvements to Serve 4,000 and 6,500 Dwellings



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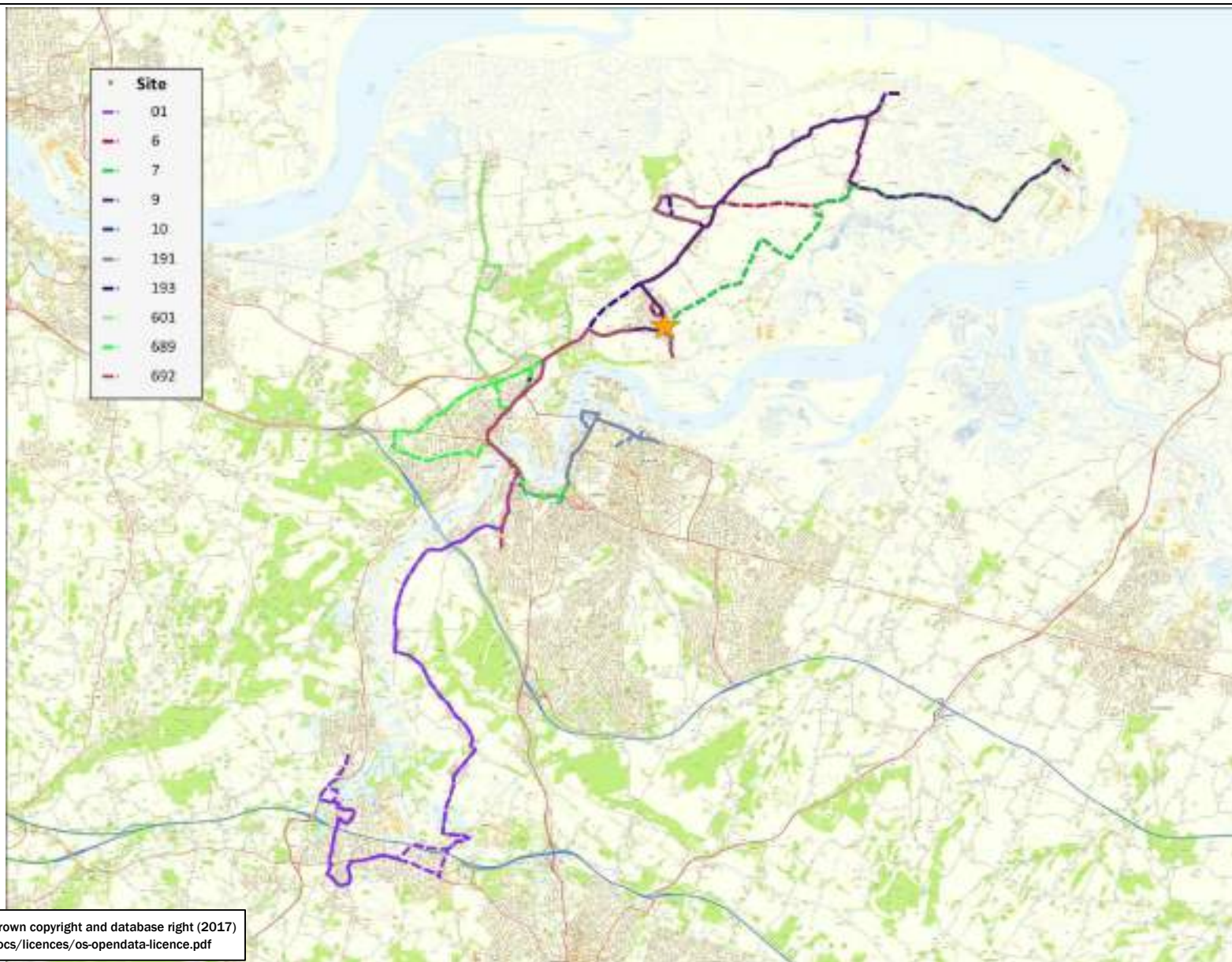


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Rev	Date	By	Revision notes
Status			
FINAL			

Project	MAIN ROAD, HOO ST WERBURGH, MEDWAY
Title	CYCLING ISOCHRONE

Drawn by MF	Issue date 08 MAR 17
Scale(s) NTS	
Drawing No FIGURE 1	



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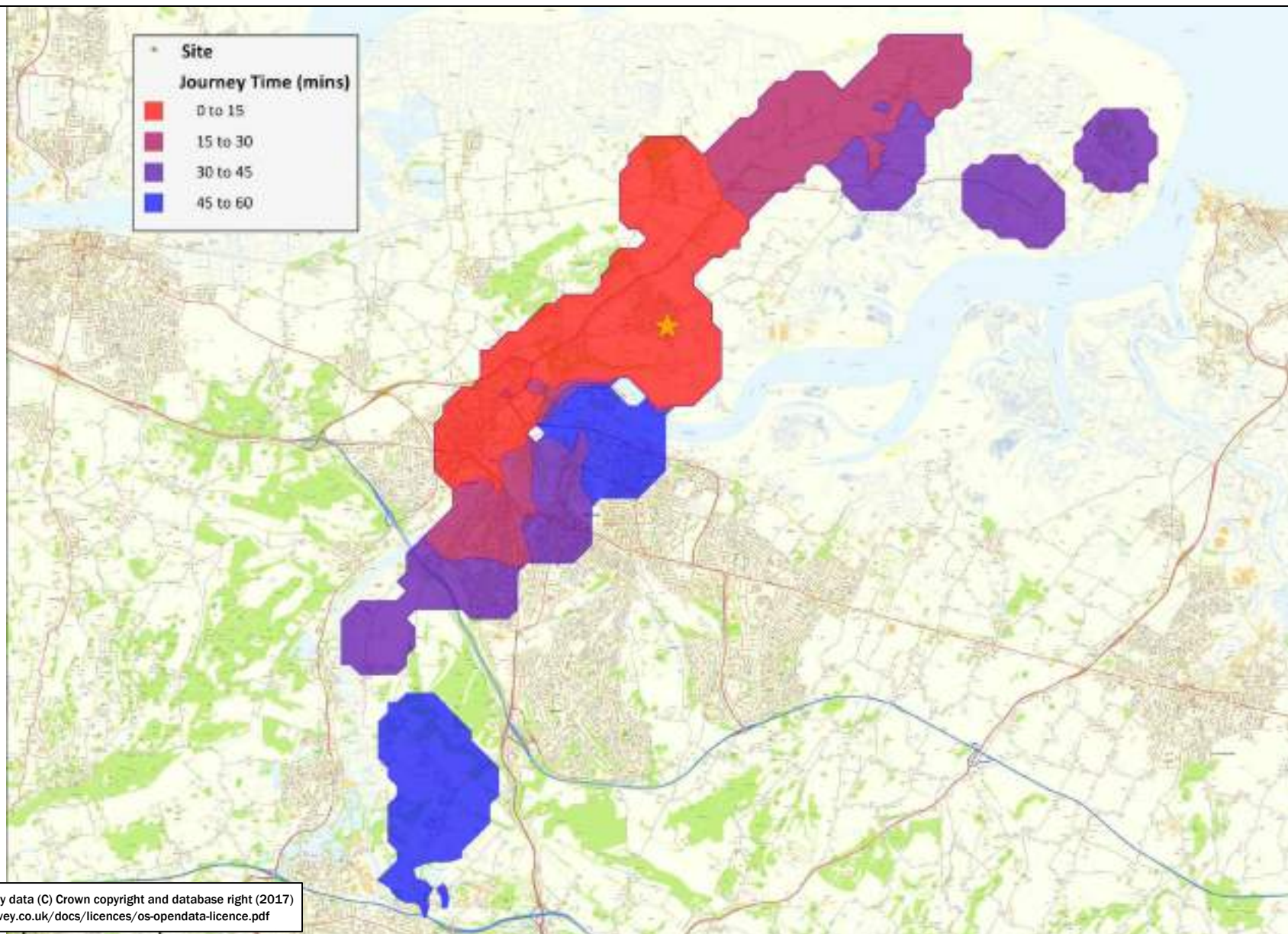
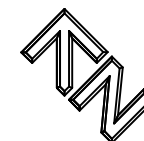


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Status			
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Project	MAIN ROAD, HOO ST WERBURGH, MEDWAY
Title	EXISTING BUS ROUTES

Drawn by MF	Issue date 08 MAR 17
Scale(s) NTS	
Drawing No FIGURE 2	



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Status			
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Project	MAIN ROAD, HOO ST WERBURGH, MEDWAY
Title	BUS CATCHMENT (AM PEAK PERIOD)

Drawn by MF	Issue date 08 MAR 17
Scale(s) NTS	
Drawing No FIGURE 3	

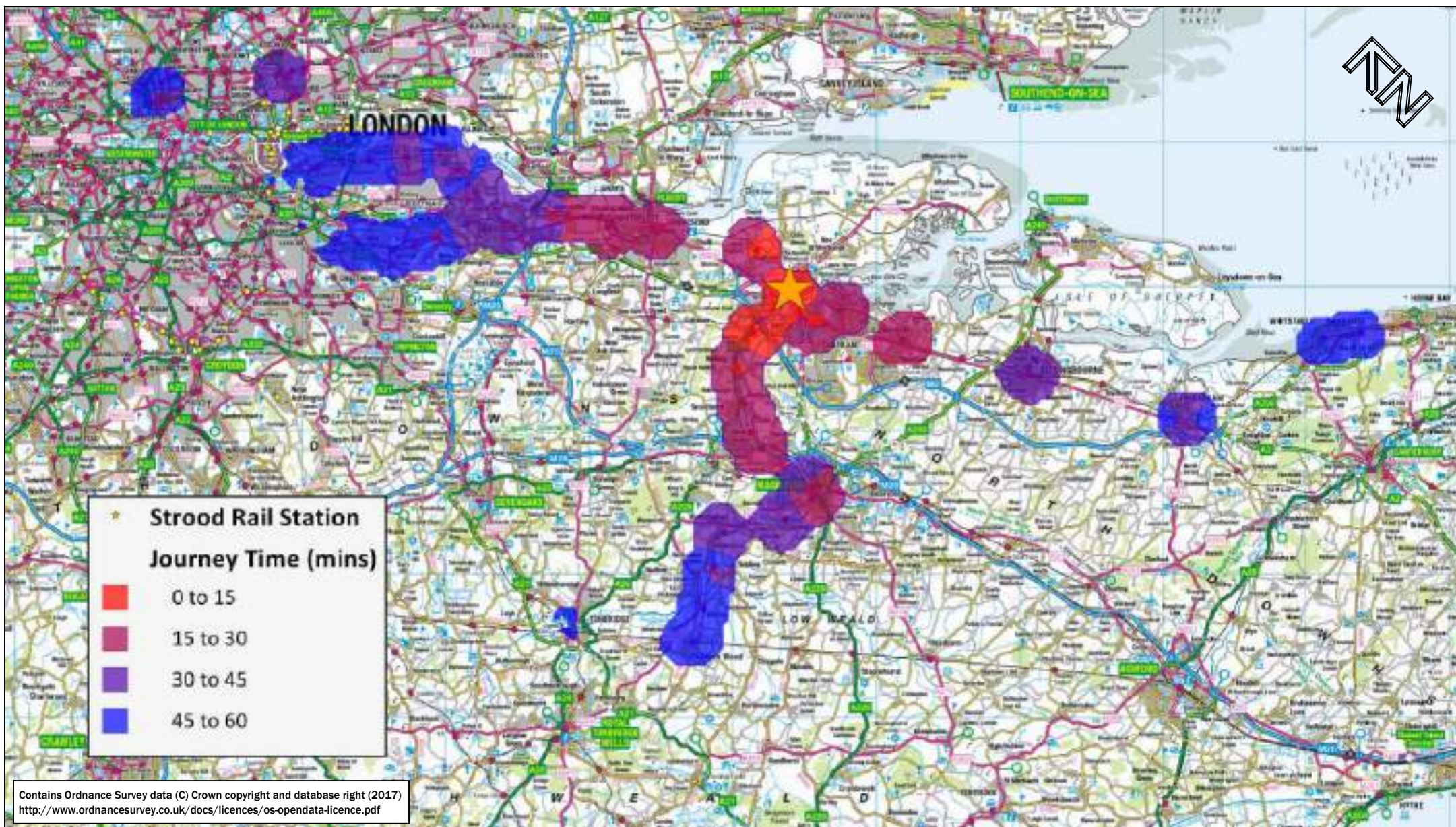



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Status			
FINAL			

Project	MAIN ROAD, HOO ST WERBURGH, MEDWAY
Title	COACH CATCHMENT (AM PEAK PERIOD)

Drawn by MF	Issue date 08 MAR 17
Scale(s) NTS	
Drawing No	FIGURE 4



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	Status				Title	RAIL CATCHMENT (AM PEAK PERIOD)		Drawing No	
	FINAL							FIGURE 5	

NOTES:

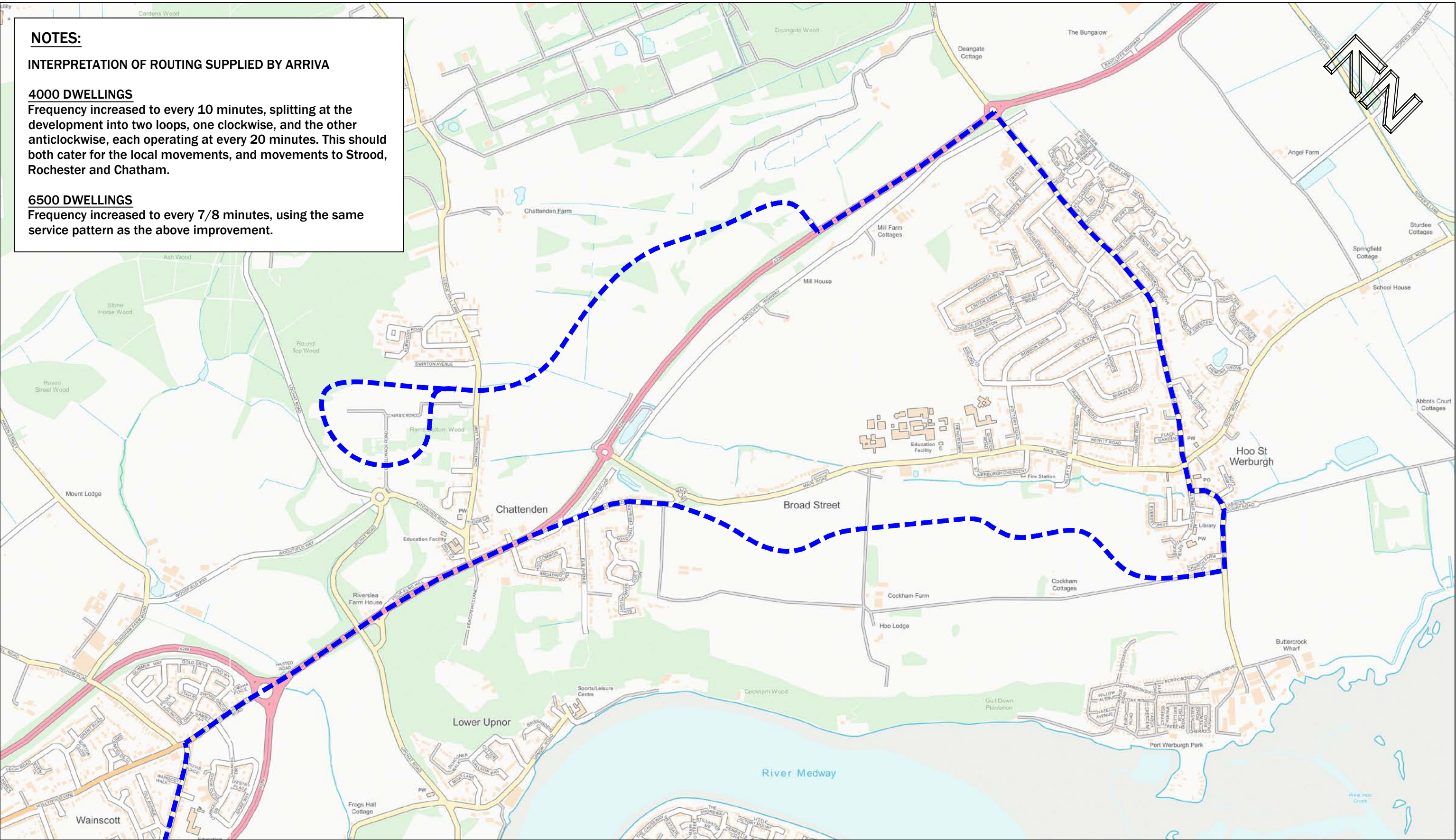
INTERPRETATION OF ROUTING SUPPLIED BY ARRIVA


4000 DWELLINGS

Frequency increased to every 10 minutes, splitting at the development into two loops, one clockwise, and the other anticlockwise, each operating at every 20 minutes. This should both cater for the local movements, and movements to Strood, Rochester and Chatham.

6500 DWELLINGS

Frequency increased to every 7/8 minutes, using the same service pattern as the above improvement.



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	*	*	*	*			Scale(s)	NTS	
	Rev	Date	By	Revision notes			Drawing No		FIGURE 6
	Status					Title		BUS ROUTING IMPROVEMENTS TO SERVE 4000 + 6500 DWELLINGS	
FOR INFORMATION									

APPENDIX B

ARRIVA MEETING MINUTES

Location: Lacon London 84 Theobalds Road, London

Date: Wednesday 1st March 2017

Time: 1:00pm

Attended by: Emma Taylor (ET) – Head of Commercial, Arriva (by phone)
Robert Patterson (RB) – Commercial Development Manager, Arriva
David Schumacher (DS) – PRIME Transport Planning (PTP)

Apologies: N/A

Background:

DS set the scene

- PTP is representing a consortia of developers supporting a number of residential developments in Hoo St Werburgh (HSW)/Chattenden through the Local Plan process;
- The Draft Local Plan is out for consultation, the consultation period ending on the 6th March 2017 (post meeting note, this has been extended until 10th April 2017);
- The developers include Gladman Developments, Dean Lewis Estates, Taylor Wimpey and Church Commissioners for England;
- The total number of dwellings being sought by the above development consortia is circa 6,500;
- There will be a need to provide access to public transport services in the HSW area and it is generally recognised that the bus will play a major role in providing this service especially in the short to medium term; and
- Arriva is the major bus operator in the Medway area and as such PTP is looking for comments/feedback regarding the role that bus travel can play in providing sustainable connections from the HSW/Chattenden area to adjacent towns/places of employment etc.

Hoo St Werburgh Development

Strategic Bus Access

- With regard to the full development of the wider HSW area, RB envisaged that the 191 service could be used to access the development plots to the south of Peninsula Way;
- With the full development in place this could probably take the form of a 10 minute frequency service;
- This would be supplemented by a new service to serve the development plots to the north of Peninsula Way i.e. the Lodge Hill and Gladman Developments schemes at Chattenden;
- Again, given the quantum of development these areas could also be served by a 10 minute frequency service;
- The main focus of bus services would probably not change too much with locations such as Grain, Stoke and High Halstow being served to the east and Strood, Rochester, Chatham, Dockside Outlet and Gillingham being served to the west, this service also provides connections to a number of universities in the area;
- These locations would also facilitate access to rail services providing connections to destinations further afield, especially London;
- Due to the potential high frequency of these strategic bus services (10 minute frequency) the timetabling of these services would not necessarily have to tie in the timetabling of rail services at the various local stations;
- DS enquired about the *Fastrack* service Arriva run in Kent providing connections to Ebbsfleet International and whether a similar system would be appropriate in HSW; and
- RB stated that this scheme is a rapid transit system which Arriva operate with dedicated vehicles to run the service, RB thought it would be difficult to deliver such a system in the HSW area.

Barriers to Bus Movements in the Area

- RB pointed out that there are a number of capacity constraints on the local highway network which delay buses at the moment, namely Four Elms roundabout and Strood Bridge;
- RB is aware that there are proposals for the upgrade of the Four Elms roundabout as part of the growth initiatives in the area, however it is recognised that there is little that can be done in relation to Strood Bridge;
- RB pointed out that with the volume of buses to serve the proposed developments suggested in the Local Plan, it would help if some form of bus priority measures are provided on the section of Four Elms Hill between Four Elms roundabout and the roundabout junction of Peninsula Way/Main Road;
- DS suggested that such a measure may require the widening of Four Elms Hill to provide an additional lane for the bus priority measures as forecast volumes of traffic were set to rise as a result of the various development proposals in the area;
- DS also thought that one of the options was to signalise Four Elms roundabout;
- RB suggested that the inclusion of bus priority measures within the signals would be extremely beneficial;
- RB also suggested that real-time information at bus stops was useful, however Arriva are pursuing apps for smart phones as an alternative as this technology is seen to be the way forward in relation to providing passenger information; and
- RB suggested that the delivery of the Lower Thames Crossing would be a useful piece of infrastructure in the area and would ease some of the traffic problems local to HSB.

Access to Local Bus Services

- DS commented that whilst strategic access could be accommodated by bus services, could Arriva see a role for themselves in operating local services within the HSW area to complement the more strategic services;
- ET suggested that Arriva would be interested in operating such a service, would need to take a look the routing and frequency of services, type of vehicle to be used (just invested in low emission minibuses to operate such a service elsewhere), fare structure i.e. free service, flat fee etc; and
- Would have envisaged that this type of local service may need S106 funding from developers to pump prime with the potential for Arriva taking over the service on a commercial basis at some point in the future.

Connections to Rail Stations

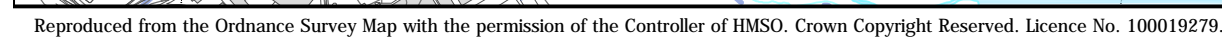
- ET/RB suggested that residents in the Medway area are likely to want access to destinations further afield, especially London for employment purposes;
- It was also generally recognised that the rail connections in the area would provide for quicker access to London and that Strood Station offered the better of the various options for accessing these services as Strood Station provides connections to both high speed services to St. Pancras and additional services to Maidstone and Tonbridge;
- This was also the nearest station to HSW;
- Whilst it is recognised that the bus stops are some 2 minutes' walk from the station, these bus stops are of good quality and the distance was not seen as a barrier to the use of Strood Station for accessing rail services;
- DS asked if direct access to Strood Station had been considered, RB stated that the road layout in the area was not conducive to buses exiting the station and that providing direct access to Strood Station was not commercially attractive;
- KB went on to comment that should the walk distance between the bus stops and Strood Station be seen as a barrier to its use, passengers could stay on the bus for another couple of minutes, alighting at Rochester Station instead where bus stops are provided directly outside of the station entrance;
- Rochester Station also provides services to London Victoria and Dover Priory;
- Rochester and Strood stations both accommodate 12 car trains;
- DS enquired about bus access to other stations in the area including Gravesend and Ebbsfleet International; and
- ET/RB both commented that both of these stations were too far and that the journey by bus in peak periods could take some considerable time given the congested nature of the routes to these stations from HSW. Ebbsfleet International also does not provide access to connections to Victoria;

The Use of Park & Ride

- DS enquired whether P&R would be beneficial from a bus operator's perspective; and
- RB commented that Chatham town centre is quite weak shopping wise so there is potentially a lack of demand and that HSW is probably in the wrong location to offer significant benefits from a P&R perspective.

Actions

- DS to keep Arriva informed as to how the potential wider development of HSW progresses.



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FUTURE MEDWAY LOCAL PLAN 2012 TO 2035

Representations on behalf of F D Attwood and Partners

Prepared by Hume Planning Consultancy Ltd

June 2018

1 INTRODUCTION

- 1.1 These representations on the Interim Sustainability Appraisal (SA) and Development Strategy (DS) are made on behalf of F D Attwood and Partners who have participated at all earlier stages of consultation for the replacement of the Medway Local Plan of 2003.
- 1.2 Medway Council as Local Planning Authority has failed on two occasions to produce a sound replacement for the time expired Local Plan. On both occasions and when the Council's strategy for replacement was subject to examination, it became clear after partial examination that what was being proposed was unsound. In both cases the Council was forced to withdraw the draft plan.
- 1.3 In these circumstances it would be expected that those producing the new Development Strategy, that is the subject of this consultation, would have paid close attention to and addressed the reasons why the previous attempts and particularly the last attempt to produce a sound plan failed.
- 1.4 In all the documentation that informs the new DS there is no mention of the Council's historic and continuing failure to meet, by a substantial margin, its own housing targets. With no up to date Local Plan this has led to development being allowed on appeal because the Council cannot demonstrate that it has a 5-year supply of deliverable housing land.
- 1.5 While there is recognition that the DS has to meet objectively assessed housing need (OAN) and discussion of the implications of the government's standard approach to OAN, this long standing old problem is proposed to be solved by old solutions that have demonstrably failed and been the reason why the previous draft plan was found unsound.
- 1.6 The Council has produced a document entitled Medway 2035. This contains worthy ambitions and objectives for the future of the Medway Towns and reference is made to it in the Vision and Strategic Objectives Chapter of the DS. The DS mistakenly states that this document will deliver on these objectives, but this is not the case. The Local Plan and only the Local Plan and the policies it will contain is the vehicle for delivering on these promises.
- 1.7 While the Council's municipal governance and interventions will play a part in this process it is the Local Plan that will provide certainty of delivery of housing, employment, regeneration and importantly the infrastructure and its funding needed to provide sustainable development.
- 1.8 The DS and particularly Medway 2035 state that the focus for managing change will be continuing regeneration, but it can be seen from the DS that regeneration will play only a small part in meeting not least housing and employment needs. Regeneration is supported but once again in this respect historically the Council has failed to meet its own targets set out in the 2003 Local Plan.

- 1.9 It follows that sustainable planned urban extensions to the Towns are also required and to a far greater extent than the DS recognises. Instead the DS proposes a strategy that caused the previous draft plan to be found unsound i.e. development within the Chattenden Woods Site of Special Scientific Interest (SSSI) at Lodge Hill (LH) and what is referred to as a rural town in an unsustainable location. For instance, at paragraph 5.2.2.1 of the Sustainability Appraisal of Development Scenarios (April 2018) a clear search hierarchy is set out, looking first to regeneration of Medway's urban centres, followed by development of a rural town around Hoo and lastly development in smaller centres or suburban locations, (the latter meaning urban extension sites). This search hierarchy, reflected in the SA appraisal, is considered to be flawed and urban extension opportunities should instead be elevated for deliverability and sustainability reasons.
- 1.10 The purpose of the SA is to assess the options for development in accordance with the requirements of an SA as set out in paragraph 1.1 of the SA, basically that flowing from the European Strategic Environmental Assessment (SEA) Directive (2001/42/EC) and accompanying Regulations and Policy.
- 1.11 To provide context for these representations on the DS those elements of the SA relevant to the issues raised are first summarised and comment on the DS is subsequently made referring to the pertinent conclusions of the SA in respect of the four development scenarios set out.

2 SUMMARY OF THE INTERIM SUSTAINABILITY APPRAISAL.

- 2.1 The document as it stands is quoted as an interim appraisal of four scenarios and an assessment of draft policies in the Emerging Local Plan (MLP). The principal objections to the DS (see below) are to a strategy that proposes development in an unsustainable location on the Hoo Peninsula, the proposed development at Lodge Hill and the failure to recognise that planned urban extensions to the urban area are needed to a far greater extent than currently proposed.
- 2.2 Failure to look at alternatives to development at LH was the reason why the previous draft Local Plan was withdrawn. There is no evidence in the four scenarios set out in the SA to suggest that this has been undertaken at the level of detail required to overcome the previous conclusions of the examining Inspector. It seems foolhardy in the extreme to continue to promote a development at LH, albeit reduced in scale, that is fundamentally at odds with legislation and policy that seeks not only to protect biodiversity capital but enhance it.
- 2.3 This could lead to two untoward outcomes, the first being that the examining Inspector will endorse the previous Inspector's findings in respect of LH and secondly it raises the spectre of a Judicial Review of the draft plan or indeed the plan as proposed to be adopted should it continue to promote development at LH.
- 2.4 The SA is first summarised under the headings below and its conclusions and

recommendations on the four development scenarios discussed when commenting on the DS.

i Biodiversity

- 2.5 Environmental designations are set out in 3.16.2 of the SA ie that the Wildlife and Countryside Act 1981 implements EU legislation related to the management of natural habitats and wild birds in addition to measures on the protection of SSSIs. DEFRA has also set out guidance and strategies relating to biodiversity management including Making Space for Nature 2010 and Biodiversity 2020: a Strategy for England's Wildlife and Ecosystem Services 2010.
- 2.6 The Framework pulls together policy on environmental designations stating that plans should allocate land for development with the least environmental value, where consistent with other policies in the Framework (para110). Importantly the presumption in favour of sustainable development does not apply where development requiring Appropriate Assessment under the Birds or Habitats Directive is being considered planned or determined (para119). The planning system should also provide net gains to biodiversity (para 109).
- 2.7 Additionally the government published in January 2018; A Green Future; Our 25 Year Plan to Improve the Environment. Amongst many things it aims to protect threatened species and protect wildlife habitats.
- 2.8 Comment is made below on this wide-ranging biodiversity legislation and policy in respect of the SAs conclusions on Scenario 4 which identifies LH for development.

ii Transport

- 2.9 The SA identifies the key issues for traffic in Medway as follows. There are adverse impacts resulting from high traffic volumes and a dependency on the private car. There is limited public transport in the Towns and reduction in NO2 emissions is required. Noise and light pollution associated with traffic, particularly in rural areas needs to be managed.
- 2.10 The SA sees opportunities to improve connectivity across Medway and the wider south east and encourage more sustainable forms of transport such as walking and cycling. No mention is made of improving the public transport offer with better connectivity which should be linked to the other identified opportunity of distributing new development to reduce travel time and at the same time reducing dependency on the private car.

iii Sustainable Locations

- 2.11 The SA has fourteen wide ranging objectives that are used to test the sustainability of the policies and development scenarios that when acted upon will lead to the policies and provisions of the new local plan embracing sustainability in the widest sense having had regard to the constraints and opportunities identified in the Medway Towns.
- 2.12 Uppermost in meeting these objectives is to ensure that development is proposed in

locations that meet not least the biodiversity and transportation objectives outlined above.

- 2.13 A major difficulty identified in comments below on the DS is that the Council's record on housing provision is woeful and the challenge of meeting not just the currently identified requirement considerable, but that seeking to accommodate the government's standard assessment of objectively assessed housing need for Medway, challenging beyond anything ever achieved or even contemplated by the Council.
- 2.14 It follows that having regard to the objectives and findings of the SA the location of development will need to be where its impact is minimised, in locations that on the one hand minimise the need for mitigation and infrastructure and where such locations are readily accessible to a wide range of services. Analysis of the four scenarios set out in the SA (see below) suggests that more planned urban extensions than currently proposed in the DS are necessary.

3 COMMENTS ON THE DEVELOPMENT STRATEGY.

Comments are dealt with under the following headings;

- 1) The Location of Development
- 2) Meeting the Housing Requirement
- 3) Transportation
- 4) Employment
- 5) Landscape
- 6) Overall Conclusions

LOCATION OF DEVELOPMENT.

- 3.1 There is recognition within the Sustainability Appraisal of Development Scenarios of how crucial the proposed passenger rail connection to the Peninsula would be to make this location sustainable. The SA also highlights how important that this rail infrastructure will be to the "branding and image" of this location. It is evident that this rail line connection "building block" of the spatial strategy, which focuses on the Hoo Peninsula is dependent on HIF funding. Paragraph 6.8.2.2 of the SA states that "HIF

can provide the opportunity for unlocking potentially high impact strategic infrastructure schemes which can make this vision a potential reality.” Underlying this spatial approach is a belief that an unsustainable and unproven location for the delivery of housing, can be made more sustainable as a result of a new passenger rail corridor. The urban extension model is proven to deliver within a shorter timescale and developer funded infrastructure will also make existing communities in the surrounding area more sustainable and therefore have more wider benefits than a proposition that is based on making an unsustainable location more sustainable to justify its selection. For this reason, the elevated position of the Hoo Peninsula in the search hierarchy and as highlighted in Para 5.2.2.1 of the SA is flawed.

i Lodge Hill

- 3.2 Lodge Hill consists of the former Ministry of Defence site known as Chattenden Barracks. This site has been mooted for development for the last 25-30 years and in the previous draft iteration of a replacement plan was the principal location to fulfil housing and employment needs with a proposed mixed development including up to 6,000 dwellings. Because Lodge Hill was confirmed as a SSSI during the examination of the draft plan and the reason it was withdrawn, there was no discussion of whether LH and the regeneration programme would be enough to provide for identified development needs. This matter is discussed below.
- 3.3 The Council continually promoted the site as brownfield, but this is clearly not the case. The examining Inspector after a site inspection concluded that only about 15% fell into this category the rest properly being classified as greenfield. Subsequent to the withdrawal of the draft plan the Council perversely resolved to grant planning permission to a planning application for mixed use development on the Lodge Hill site that was the subject of 11,000 objections. A departure from the development plan caused the Secretary of State to determine that a public inquiry (since cancelled) was necessary. The developer then walked away.
- 3.4 Because the Council are still misguidedly promoting this site for development, albeit with a reduced proposal of 2,000 dwellings in a mixed development, it is necessary to briefly recall the previous examining Inspector’s conclusion that Lodge Hill was unsuitable for development and that a proper examination of alternatives should be undertaken, an established and necessary balancing exercise that was not evident in the council’s proposals for LH. It will be necessary to demonstrate that such an exercise has been properly undertaken when the plan is again submitted for examination.
- 3.5 In a letter to the Council dated the 21st June 2013 the Inspector concluded that the proposal for Lodge Hill would have a significant adverse impact on the SSSI and the National Planning Policy Framework’s objective of halting the decline in biodiversity. The council will be aware of the government’s 25 Year Environment Plan published on the 11th January 2018 further reinforcing this aspect of the Framework’s environmental capital objectives. The Framework is itself proposed to be revised and this is further discussed below.
- 3.6 The Inspector was not convinced that no reasonable alternatives existed and was not persuaded that any social or economic benefits that might flow from the proposed development at Lodge Hill would outweigh the harm to a site of national importance

for biodiversity.

- 3.7 The Council in the Vision and Strategic Objectives chapter of the DS recognise that the Sustainability Appraisal and Habitat Regulations process will inform the Local Plan and state in paragraph 2.38 that impacts on the environment are best avoided and that opportunities are taken to realise net gains for nature. Paragraph 2.40 states in terms that the "Council has a custodial duty to conserve and enhance the natural environment in particular designated habitats..." Draft Policy NE5 Securing Strong Green Infrastructure includes the following wording; "A high level of protection will be given to Sites of Special Scientific Interest and Ancient Woodland".
- 3.8 When it is realised that the proposal at Lodge Hill means development within, not adjacent to or close to, but within a SSSI, it is once again perverse in the light of the paragraphs quoted above and all that has gone before in this respect, that the Council still consider Lodge Hill to be a sustainable option for development. The substantial level of necessary mitigation pleaded in its favour is evidence of its significant adverse impact. In any event the SA concludes in respect of development at LH that there is a risk mitigation will be unsuccessful.
- 3.9 More worrying is the fact that if this option is proposed in the replacement plan it is likely be found unsound once again or require substantial modifications to be considered with the examination possibly suspended. This is not the way the Government requires plan making to be undertaken. It requires plan making to be expedited and is considering penalties for authorities that are dilatory in this respect. Medway's poor track record is evident for all to see.
- 3.10 It is axiomatic that in seeking land for development local planning authorities should begin by looking for sites that have less development impact than those that constitute Sites of Scientific Interest and Ancient Woodland. The DS states at paragraph 3.60 that if the proposals for Lodge Hill are determined to be sustainable then they would contribute to meeting OAN and could replace the need to release land at Lower Stoke and south of Shawstead Road in the Capstone Valley. In that these alternative sites are not subject to SSSI and Ancient Woodland designation it is difficult to reconcile this statement with that of a responsible plan making authority who will have to defend such an approach at examination.
- 3.11 The SA under Scenario Four, which gives consideration to development at LH, concludes that under Environmental Objectives 6,7 and 8 that the impact of development is significantly negative in the short, medium and long term. These objectives seek to protect and enhance biodiversity features and reduce and adapt to the impacts of climate change and pollution. The scenario is also said to result in the direct loss of high quality biodiversity habitat which is designated a SSSI, significantly impact on notable and protected species and result in the loss of high quality agricultural land.
- 3.12 3.13 It is claimed that the scenario protects Ancient Woodland from development pressure and direct impacts, however it is suggested that future pressure would arise from increased direct access. It is also suggested that monitoring can be undertaken to identify adverse impacts. Such an approach is inimical to the monitoring process in this instance in that once biodiversity is identified as having been significantly impacted, harm and/or loss would have already occurred.

- 3.13 It is quite clear that having regard to the previous examining Inspector's conclusions and those of the SA in respect of Scenario 4 development at Lodge Hill should be removed as a proposal in the replacement plan. F D Attwood and Partners have, through Hume Planning been in discussions with the council in respect of a series of interlinked planned urban extensions in the Hempstead Valley. It is the intention to pursue these through the local plan examination process in order to provide a more sustainable development for up to 2,000 dwellings than that currently proposed at Lodge Hill. Although an early application on part of the landholding is to be progressed within the portion of the landholding identified in the options diagram within the draft plan. Because of the extensive family ownership across virtually the whole of the Hempstead corridor uniquely there is the opportunity for a phased comprehensively planned mixed use phased urban extension that can be delivered in an accelerated way.
- 3.14 The Council is already aware of the arguments surrounding the suitability of these sites, in that they are closer to services and the main centres of population and can enhance and complement existing areas of open space and will provide education and highway benefits (including enhanced public transport linkages and routeways) which will also then be of benefit to the existing surrounding community. This option would also take a lower grade of agricultural land rather than the best and most versatile. The development of this corridor would also deliver transportation benefits which are discussed below.

ii Hoo Peninsula Rural Town

- 3.15 The Hoo Peninsula is isolated from urban Medway, consists mostly of Grade 1 agricultural, has its own distinctive landscape and comprises a number of environmental designations of international and national significance. The term Rural Town suggests this would be an isolated settlement divorced from the urban area. This in turn raises issues of accessibility to services and whether transportation options would be sustainable.
- 3.16 The scale of growth proposed is not identified but it could be substantial looking at the number of sites being considered, and it is recognised that large-scale growth on the Peninsula "is dependent upon significant upgrades in infrastructure, including transport, health, education and wider community facilities" Para 3.28 DS. However, it is doubtful that the Rural Town proposed would develop a critical mass to make it substantially self-sufficient, for example so as to avoid out commuting to find employment. The reality is that it would effectively be an extension and/or consolidation of the existing rural settlements on the Peninsula.
- 3.17 In the first instance the approach to infrastructure provision in association with development should be to focus development where the level of infrastructure required is basically in place and where development can contribute to increasing and/or improve the existing level of infrastructure through that occasioned by the development proposed. The justification for the proposed development on the Peninsula is to suggest that the infrastructure currently lacking in the area could be enhanced by development.
- 3.18 To meet the criteria set out above, new development in Medway will need, in addition to regeneration sites, to focus on a series of planned urban extensions to the Towns.

About seventy percent of the population of the Towns lives south of the River Medway and it is here that development should be concentrated where the level of a wide range of services is closer to the majority of the population compared with the situation on the Peninsula.

- 3.19 The DS recognises that one of the principal difficulties of accommodating additional growth on the Hoo Peninsula is the need to provide sustainable transportation. Development would place additional unacceptable pressure on the A228 which is already heavily congested at peak times with its junction with the M2 and this places a constraint on growth.
- 3.20 Transport solutions for sustainable growth require broadening the choices of how people travel, DS para 3.42. Public transport on the rural Hoo Peninsula is limited and there are higher rates of car usage than are seen in the urban parts of Medway. The strategy looks to upgrade the capacity of the highway network through new connections and improvements at Four Elms and road widening of the A228.
- 3.21 Additionally, consideration is being given to providing a new railway station on the freight only line that traverses the Peninsula and Network Rail is currently evaluating this. Paragraph 11.21 of the DS states that many commuters from the Hoo Peninsula currently drive from villages to stations at Strood, Gravesend or Ebbsfleet and with the scale of growth forecast in this option in the DS this commuting pattern is neither sustainable nor desirable. This commuting pattern adds to congestion on the A228 and congestion contributes to air quality issues at the Designated Air Quality Management Area at Four Elms Hill.
- 3.22 Without a new station it would appear that the level of development for the Peninsula as currently proposed would not be sustainable and cannot be supported. Network Rail will require a robust business case to justify the provision of a new rail service with forecast ticket sales guaranteeing running costs and providing a return on capital. From an operational point of view, it will be necessary to ensure line capacity on the Strood - Gravesend - London line is available during peak operating periods.
- 3.23 The Peninsula development option, if nothing else, relies therefore on a decision by Network Rail concluding that a new station and rail service is feasible. The business case for the station will be reduced by the necessary removal of the Lodge Hill proposal on biodiversity and environmental grounds. Before concluding on this option, a decision from Network Rail will need to be available at the time the plan is examined. Even if Network Rail were to support the principle the delivery of this option would depend on public funding HIF which is a risk to delivery compared with private (developer funded) infrastructure provision for the urban extension sites.
- 3.24 However, to concentrate this level of development in an area divorced from principal services centres and where the burden of new infrastructure provision is considerable is inappropriate given the alternative urban extension option available in the Hempstead corridor.
- 3.25 The SA considers development on the Hoo Peninsula under Scenario 2. It states in terms that there is no detail on the strategy needed to achieve the expansion of the rail network and associated infrastructure.

- 3.26 Also, it is clear from the initial assessment that there is “insufficient information to facilitate an assessment of this scenario against objectives concerning the conservation and enhancement of existing green and open space network (objective 5) and biodiversity features (objective 6). The overall impact against Objectives 5 and 6 is therefore unknown and would depend on the implementation strategy”.
- 3.27 In the description of the scenario it is stated that it would alleviate pressure for development “in suburban areas”. This is taken to mean it would reduce the need for planned urban extensions to the Towns. What is clear is that there is considerable uncertainty surrounding the delivery of this scenario and the examining Inspector will need a robust indication in the Infrastructure Delivery Plan as to how the necessary infrastructure is to be provided, by whom and over what timescale.
- 3.28 Given these considerable uncertainties it can be concluded that Scenario 2 will not bring about the urgently needed and timely delivery of housing and employment development.

MEETING THE HOUSING REQUIREMENT.

- 3.29 The state of housing provision in Medway is precarious. Throughout a period of 31 years the council has significantly failed to provide anything like the necessary level of housing provision and has only met its own development plan target on four occasions during this period. The under supply during this period has been in the order of 6,000 dwellings.
- 3.30 The Council’s identified housing requirement for the year 2016/17 was 1281 dwellings. Completions for this year totalled 642 dwellings just 50% of what was required. Equally worrying is that the Council’s housing trajectory for 2016/17 anticipated circa 900 dwellings. For next year, 2017/18 the trajectory anticipates about 1,200 dwellings with no evidence of where this total will come from in terms of completed development. The figures quoted are derived from the Council’s own *Medway Monitoring Report 1st April 2016 to 1st April 2017 - Volume 1*.
- 3.31 This state of affairs arises because of the Council’s refusal to recognise the failure of the anticipated impetus of the regeneration programme and which the council claims is the mainstay of the new DS, as well as its adherence to the Lodge Hill development that has failed to come forward in the anticipated timeframe and which it pursues notwithstanding the examining Inspector’s conclusions that development at Lodge Hill would have a significant adverse impact on the SSSI and the Framework’s objective of halting the decline in biodiversity. A conclusion that led the Council to withdraw the previous draft Replacement plan. It is clear that a radical approach to overcome this situation is required in the DS in the third attempt at a replacement Local Plan. One that should adopt new solutions to address old long-standing problems.

- 3.32 FD Attwood and Partners have discussed a number of potential development options for the Hempstead corridor with the Medway policy team all of which were consistent with a comprehensive masterplanned and deliverable vision for the totality of the corridor stretching as far south as the M2. The most comprehensive option included a proposal for cross boundary working with Maidstone to secure circa 4,000 dwellings in this location. F D Attwood and Partners propose to pursue this option but for the purposes of the replacement Local Plan will also pursue an alternative growth option that is wholly within the council's administrative boundary (but also consistent with the cross boundary option) to replace the misguided proposal at Lodge Hill.
- 3.33 This will give the examining Inspector the degree of certainty required that these sites will contribute to housing needs and demonstrate that individual parcels within the totality of the landholding, all under the control of F D Attwood and Partners, can be delivered over the plan period alongside necessary infrastructure. Development within Medway Councils administrative area alone could deliver community facilities including a site for a primary school with all existing woodland and public open space remaining which would be reinforced and enhanced by structural landscaping. This proposal is currently the subject of a Transportation Assessment which will be produced at the plan's examination. Hume Planning is prepared to work constructively with the Council to pursue this option as a sustainable and deliverable proposal in the Replacement plan and as part of that process consider in detail, issues surrounding infrastructure delivery, funded by the that would be development.
- 3.34 Even if the Lodge Hill proposal were to go ahead the Hempstead Valley proposal for an additional circa 2,000 dwellings (wholly within the administrative area of Medway) is still necessary for the following reasons.
- 3.35 In September 2017 the Government published a consultation document entitled Planning for the Right Homes in the Right Places that included a proposed standard method of determining local housing need. The supporting information identified an annual housing need up to 2026 for each Local Planning Authority in England.
- 3.36 For Medway the figure is 37,143 or 1,665 dwellings per annum, a substantial increase over the current 1,281 dwellings per annum requirement and what is currently being completed each year. The Government has confirmed its expectation that Local Planning Authorities use the standard method where plans have not yet been submitted for examination, as is the case in Medway. It is relevant that the Sustainability Appraisal itself acknowledges that Scenario 3 will result in a significant shortage (circa 1407 dwellings) of housing against the requirement.
- 3.37 Proposals to revise the Framework include an expectation for objectively assessed housing needs to be accommodated, unless there are strong reasons no to do so; including unmet needs from neighbouring areas.
- 3.38 This lends credence to the 4,000-dwelling cross boundary option being considered by F D Atwood and Partners and ongoing dialogue between F D Attwood and Partners and Medway and Maidstone Councils will be strongly pursued during this process.
- 3.39 It is clear that Medway has a housing delivery problem and as stated above the discrete sites being considered in the 2,000-dwelling option at Hempstead are capable of relatively early delivery compared with potential proposals on the Hoo

Peninsula. The draft revisions to the Framework propose changes in respect of housing delivery.

- 3.40 Scenario 3 of the SA sets out to assess the impact of meeting the 37,143 dwelling requirement. In the description it recognises that provision would occur “through the reallocation of employment sites to housing developments, bringing in additional greenfield sites, and greater reliance on opportunity regeneration sites.....”
- 3.41 When the initial appraisal and recommendations surrounding this option are considered there is even more uncertainty than that identified by the SA in the Hoo Peninsula scenario. The assumption that existing employment sites would be reallocated for housing is vague and confusing. Such sites are not identified and there is no recognition that this approach goes against the emerging employment strategy of providing more employment sites and Objectives 1, 2, 3, and 4 of the SA.
- 3.42 This scenario and Scenarios 2 and 4 show clearly that the Council have gone about the sustainability assessment of a draft development strategy in the wrong way. While it is recognised that the relationship between the DS and SA is an iterative process the DS has not firmed up the options enough to make the SA, at this stage, a meaningful exercise. There is too much speculation in the SA of potential impacts resulting in a “high level of uncertainty which should be addressed” (Recommendations for Scenario 2).
- 3.43 These include, in addition to a housing trajectory illustrating delivery over the plan period, that all plans should consider whether it is appropriate to set out a specific rate of development from specific sites. The supply of specific deliverable sites should continue to include a buffer of 20% where there has been significant under delivery of housing over the previous three years, as is the case in Medway.
- 3.44 Where a Local Planning Authority cannot demonstrate a five-year supply of deliverable housing land, as is currently the case in Medway, paragraph 11d of the draft Framework will apply. This states that planning permission should be granted where proposals accord with an up to date development plan without delay. Where there are no relevant development plan policies, or where policies are out of date, permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or, any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework when taken as a whole.
- 3.45 This approach, subsequent to a Supreme Court decision, overcomes the confusing debate as to whether housing policies, where a five-year supply cannot be demonstrated, are up to date, an issue which arises from the wording of current Framework. The Government is also proposing a Housing Delivery Test. While these proposals are currently in draft there is no doubt that in order to boost housing supply the Government proposes to scrutinise to a greater extent issues surrounding housing delivery. It will be necessary for the Council to be able to demonstrate a five-year supply of deliverable housing land at the plan’s examination.
- 3.46 Overall it is clear that more planned urban extensions are necessary and the programme for housing delivery is likely to be quicker. The draft plan suggests that a

creative and innovative approach is required in land use decision-making and in the context of such significant levels of housing pressure upon Medway, this creative approach needs to be applied to the historic approach to the role of green corridors. Within the urban areas, for instance this could involve an objective assessment of how qualitative improvements can be secured and their function and use can be promoted alongside residential led development.

TRANSPORTATION.

- 3.47 The DS states at para 11.1 that an effective and sustainable transport network is intrinsic to how places work well and is a fundamental component of successful growth. Consultation on the emerging Local Plan has highlighted concerns about existing pressures on transport networks and their capacity to accommodate growth.
- 3.48 Medway experiences congestion on a complex highways network resulting from its geographical and historic pattern of development. The Council has commissioned a Strategic Transport Assessment. Modelling suggests that key junctions across Medway and especially in Chatham Town Centre will exceed capacity by 2035 and that some junctions in Chatham already exceed or operate close to capacity. The Strategic Transport Assessment will inform strategic and specific mitigation requirements for sites allocated for development in the local plan.
- 3.49 The Attwood proposal at Hempstead raises the possibility of providing the abandoned Medway Towns Southern Relief Road (MTSSR). This would link Walderslade with Hempstead and Wigmore. Reference to a map shows that traffic from Walderslade, for example, that has Hempstead or Wigmore as a destination has to go into the town centres of Chatham or Gillingham before heading south again to one or the other of these destinations.
- 3.50 To the south of Walderslade, Westfield Sole Road and Lidsing Road provide a link to Hempstead. However, these roads are virtually single carriageway in places, best described as a “rat run” and only used by those to the south of these locations. A MTSSR would not only serve the proposed development but also relieve traffic in the town centre where junctions are already at or close to capacity. This approach is to be contrasted with transport infrastructure provision on the Hoo Peninsula where there would be no wider benefits to Medway overall than occasioned by provision.
- 3.51 There is a ready-made spur at the southern end of North Dane Way which lends itself to providing the initial extension of the MTSSR. Hume Planning and C & A Transport are currently modelling the benefits that such a link could provide, not only for the proposed development at Hempstead but for the wider area including the town centres where impending or existing capacity at junctions is problematic. There would also be considerable advantages to the public transport network. As well as improving local highway capacity and the operation of junctions, this new road link across the corridor has three key benefits

- It will help to reduce current motorway junction “hopping” from Junctions 3 and 4 of the M2 which Highways England are likely to support in principle.
- It will transform bus service connectivity between Lordswood and Hempstead by providing a direct east-west link across the corridor. This is of greater relevance given both the planned expansion of Hempstead shopping centre.
- This strategic relief road will also improve the proposed strategic employment node which is identified in the draft Development Strategy close to M2 Junction 4 as shown at Figure 5.1 of the draft plan.

3.52 Transportation and accessibility appears in Objectives 1, 2, 3, and 4 of the SA and development at Hempstead would address the problems identified above and aid these objectives.

3.53 The Council is to produce an Infrastructure Delivery Plan as part of the local plan process which in the case of proposed development at Hempstead could inform what is required to facilitate a development of 2,000 dwellings in this location. This in turn can also inform a Statement of Common Ground with the council on delivery which can then cross refer to the relevant local plan policies and a package of developer contributions.

EMPLOYMENT.

3.54 The Government has set out its vision for the economy in the Industrial Strategy White Paper 2017 that seeks to boost the UK’s productivity which is the lowest of all the G7 countries. The core ambition of the Local Plan is to strengthen the performance of Medway’s economy and secure quality jobs. A skilled workforce is critical to a successful economy and Medway compares poorly with neighbouring areas.

3.55 However there have been successful developments on the Medway Enterprise Park and one of the strengths of the local economy is advanced manufacturing and technology and through the new plan the council is to capitalise on this. Nonetheless the DS recognises that Medway has a shortfall of quality employment land and in flexible formats that businesses seek. Strategic employment provision is a key component of F D Attwood and Partners masterplanned vision for the corridor proposing a business park close to the motorway junction in the area identified at Figure 5.1 of the draft plan. The proposed B1 business park allocation near J4 of the M2 at Hempstead should be increased to identify a strategic employment location for Medway for the long-term future as this location has good road infrastructure close to the motorway and will provide additional provision to augment Gillingham Business Park which is nearing full capacity.

3.56 In 2015 the Council commissioned an Employment Land Needs Assessment which projects a growth of circa 17,000 jobs over the plan period. The findings of the Assessment indicate that while there is a potential surplus of employment land

represented by the large sites at Kingsnorth and Grain these do not align well with current requirements. This has been the case for a long time and was an issue raised during the passage of the adopted local plan. The Needs Assessment suggests that Lodge Hill could provide a more office and research and development orientated proposition unlike any other site within the identified portfolio (para 9.18). Given the considerable doubt surrounding development at Lodge Hill an alternative employment site/accommodation will need to be found, which can be more suitably met at the M2 Junction 4 node identified at Figure 5.1 of the draft Plan.

- 3.57 Planning Practice Guidance requires that the implications for economic growth are taken into account in establishing the local housing requirement (para 18). It will be necessary to look at job growth over the last say 10 - 15 years and compare this with the level of house building for that period. An assessment can then be made between the level of jobs anticipated over the plan period with the much-increased housing requirement. To date this exercise does not appear to have been undertaken using the figure of 37,143 dwellings over the plan period derived from the Government's standard approach to OAN. The Employment Land Needs Assessment is dated 2015. Given the historically low level of house building against targets there is a possibility that the level of jobs created will need to be greater than the 17,000 anticipated, requiring more land than the DS suggests.
- 3.58 Medway exports labour with a high level of out commuting and Council seeks to tackle this in the emerging plan with a greater degree of labour retention in the Towns. With the higher levels of housing now proposed out commuting will remain high or even increase if the correlation between house building and local job creation is not addressed using up to date data. Lack of evidence in this respect was one of the reasons the first attempt at a replacement plan was withdrawn.
- 3.59 F D Attwood and Partners support job growth and would suggest that more could be done to ensure that good quality flexible business space is made available close to Junction 4 of the M2 motorway a location where there is ready access to the national transport network. The proposed employment allocations on the Hoo Peninsula will not achieve this objective. The SA at Objective 2 seeks to establish employment opportunities at accessible locations in particular Junction 4. Reference has been made above how under Scenario 3 the use of employment sites for housing conflicts with Objectives 2 and 3 of the SA.
- 3.60 Strategic business park provision close to Junction 4 is a key component of each of the F D Attwood and Partners masterplan vision options for the wider Hempstead corridor. The recognition in the plan of the benefits of an employment node close to Junction 4 of the M2 is supported, although the scale of this provision should be increased.

LANDSCAPE.

- 3.61 The Council is updating the Medway Landscape Character Assessment 2011 to

provide a basis for the preferred development strategy of the Local Plan. It should be noted that current Area of Local Landscape Importance designations cover a significant part of undeveloped land in accessible locations, so it is inevitable that to fulfil housing and employment requirements ALLI land will need to be developed. Policies in the Framework make it clear that a locally designated ALLI is at the lower level of priority in terms of weight to be given to its protection (para 113). This will need to be recognised when the Council is considering options for sustainable urban extensions.

- 3.62 Reference is made in all 4 scenarios of the need for greenfield land, to varying degrees, to contribute to meeting Medway's development needs over the plan period.
- 3.63 Reference is made in the DS to a Green Infrastructure Network which can be enhanced by the proposal at Hempstead, ensuring the new development provides appropriate links through footpaths and cycleways, to parks and gardens, including the Capstone Country Park which occupies a central position in the Hempstead corridor, playing fields, allotments and so on.

4 OVERALL CONCLUSIONS.

- 4.1 It will be clear from the foregoing that F D Attwood and Partners, while supporting the ambitions for the Towns set out in Medway 2035, take a different view in respect of the location of development on two counts. The first is that Lodge Hill should be removed from the DS as a possible development proposal and development limited on the Hoo Peninsula, as it does not represent a sustainable location.
- 4.2 The second is that to accommodate the level of housing required much greater use should be made of creating planned urban extensions in sustainable and accessible locations. This has the double benefit of enabling discrete sites to take advantage of existing infrastructure and augment any deficiencies through developer contributions thereby expediting delivery in that development on these sites can be commenced sooner than those that require substantial infrastructure investment such as the necessary major highway improvements and the as yet unconfirmed new railway station on the Hoo Peninsula, which is reliant on public funding.
- 4.3 The examining Inspector for the Local Plan will need to be sure that the infrastructure required for development can be provided commensurate with dwelling provision and population growth and may require a statement of common ground to this effect between those promoting development and the Council, citing the relevant policies in the plan that spell out how this is to be achieved. This is more easily done through discrete planned urban extensions.
- 4.4 While clearly not the complete answer to the emerging plan's strategy the proposals for the Hempstead Valley represent a sustainable solution in a sustainable location bringing the benefits outlined in these representations, primarily sorely needed homes.

As previously stated Hume Planning will continue to work with the council to achieve this objective.

- 4.5 In view of the draft nature of the DS and the differences in approach between the DS proposals and that set out in these representations it is not considered productive at this stage to suggest alternative wording to the draft policies in the document or comment on what the SA sets out to this effect. It will be more productive to do this when the draft plan becomes available for consultation.
- 4.6 There is clearly a lot of work to do to align the DS with the objectives of the SA in formulating a strategy for Medway's development needs over the plan period. Importantly LH was the previous plan's nemesis and for it to remain in the emerging plan is likely to give the examining Inspector the same concerns as those previously voiced and lead to a similar outcome. There is also the likelihood of a Judicial Review of the draft plan or the plan as proposed for adoption if LH remains. Inclusion of LH as a development proposal will further delay the plan yet again and may well lead to Government intervention.

From: [REDACTED]
Sent: 25 June 2018 12:25
To: futuremedway
Subject: Fw: Hoo Peninsula Expansion

Categories: Blue Category

Good Afternoon,

I am writing with regards to a letter received from Kelly Tollhurst about the plans for expansion in the Medway towns, and in particular Hoo St Werburgh.

Whilst I recognise there is a need for housing, there needs to be some serious thought about the areas being built on.

Hoo is already bursting at the seams with people and cars. Adding even more housing in the area will only keep increasing the numbers.

The roads are extremely busy, and even during non prime time hours, there is traffic considering its meant to be a village.

Cars have now started parking on the main roadside where possible, proving that with the new developments and families expanding there isn't enough off road parking provided.

The roads are not simply big enough to cope with the amount of cars that are coming in and out of the village.

The doctors are absolutely full, trying to get through to the doctors on the phone is hard work and can be on hold for at least half hour at a time, if not more.

I have recently made a pre bookable appointment and this in mid July. I am waiting near on a month for a doctor.

I have a young son, who currently goes to the Hoo Nursery. I am really concerned, that due to the number of children now in the village, the schools closest to me and my child minder will not have enough space for him. This is very concerning and quite a worry. I do not want to have to travel to take my son to school.

I have seen an increase in the amount of litter on the roads and paths. Although people should pick up their litter, they don't and therefore gets left on the floor.

This is quite a regular occurrence. At the local park and I have in the past picked the litter up myself and put it in the bin. With even more people, more rubbish. This is ruining the area.

With all the building on the more rural parts of Hoo (Stoke Road and Deangate), there will be no where to go for a walk without using the main roads. As my son gets older, he will want to go out on his bike and this will not be as safe for him as there will be so many cars on the road.

Please think about the areas being built on and the amount of houses. There are plenty of other already built up areas to continue building on. Hoo does not need to become a town and neither does it need to look or feel like living in Strood high street.

Hoo does not have the infrastructure to cope at all with the amount of people or cars. Its completely bursting at the seams.

Deangate golf course could be turned into a country park and cafes rather than more housing. This will still draw people into the area and promote the area without ruining its country like feel.

Thank you in advance for acknowledging my email.

Many thanks

Amy

25 June 2018

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

Dear Sir / Madam

**FUTURE MEDWAY LOCAL PLAN 2012 TO 2035: DEVELOPMENT STRATEGY CONSULTATION
(REGULATION 18 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012**

Charterhouse Strategic Land Limited ("**Charterhouse**") is promoting the land edged 'red' on the enclosed site plan. Accordingly, this letter contains our response to the published Future Medway Local Plan 2012 to 2035: Development Strategy consultation. Our representation responds on the emerging Vision and Strategic Objections for the Local Plan and the specific questions relating to the proposed development strategy and housing asked in Sections 3 and 4 of the consultation document.

Charterhouse has not participated in the earlier rounds of public consultations for the emerging Local Plan 2012 to 2035, however, one of our landowners – Pickhill Developments Limited ("**Pickhill**") – has. Pickhill participated, via their consultant, in the January 2016 Issues and Options consultation. Pickhill's comments at this time were as follows: - [in summary form]

- The North Kent SHENA identifies the objectively assessed needs ("**OAN**") for Medway as being 1,281 dwellings per annum over the period 2012 to 2037 which does not represent the full OAN for Medway over the Plan period.
- Development of the 'Land south of Lower Rainham Road, Rainham' would constitute a sustainable form of development. The National Planning Policy Framework ("**the Framework**") is clear that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and should be consistent with the presumption in favour of sustainable development.
- The future growth strategy for the Medway area should make a provision for development at the site in the new Local Plan.

In January 2017, the Council published the Local Plan 2012 to 2035: Development Options consultation in which an assessment of the current context for Medway's economic, social and environmental conditions, together with key issues needing to be addressed, were identified. The Development Options document presented four alternative scenarios for delivering Medway's growth for the Plan period. The four scenarios were: -

██████████ ██████████ E: mail@charterh.co.uk

- (i) Maximising the potential of urban regeneration;
- (ii) Suburban expansion;
- (iii) Hoo Peninsula focus; and
- (iv) Urban regeneration and a rural town.

The Development Options consultation was supported by a series of maps for each of the four above scenarios contained within Appendix 1 of the document. All four maps identified land between the Lower Rainham Road and the railway line located on the east of Gillingham as a location for 'Mixed use development'. The land promoted by Charterhouse falls within this area and extends to circa 17 acres (6.88 hectares).

The purpose of the current Development Strategy consultation is to provide further direction on a growth strategy that responds to the vision and strategic objectives set for the plan. Paragraph 1.20 states: -

"This document evolves the assessment of potential approaches to delivering development in Medway. It provides further direction on a growth strategy that responds to the vision and strategic objectives set for the plan. It takes a sequential approach to identifying the most sustainable locations for development, identifying sites and broad locations for potential allocations in the Local Plan. Four scenarios are set out for consultation, representing variations on how growth could be delivered in line with the overarching development strategy. The document also includes the further refinement of draft policies for the Local Plan, and invites consideration of alternative approaches, before policies are presented in the next stage of the draft plan. Further detailed development management policies will be presented in the draft plan."

Section 2: Medway in 2035 – Vision and Strategic Objectives for the Local Plan

Charterhouse agrees that the scale of expected growth presents a significant challenge for Medway Council ("**the Council**") in preparing its new Local Plan. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development (paragraph 151 of the Framework), which according to the revised draft Framework can be summarised as "*meeting the needs of the present without compromising the ability of future generations to meet their own needs*" (paragraph 7). Sustainable development is seen as golden thread running through both plan-making and decision-taking (paragraph 14 of the Framework), and as such, the emerging Local Plan must have regard to this overarching planning principle.

Charterhouse broadly supports the Vision for the Local Plan identified on page 19 of the consultation document. We are pleased to see that the Council intends on pursuing an ambitious growth strategy to deliver its full OAN. However, we wish to emphasise that the emerging Local Plan does need to strike the correct balance of being aspirational but at the same time be realistic.

Charterhouse agrees that the emerging Local Plan provides an opportunity to establish a positive strategy to guide development in Medway for the foreseeable future. We are however concerned that the emerging development strategy is neither appropriate nor the most sustainable. We express significant concern over a strategy which involves significant growth at Lodge Hill and the Hoo Peninsula.

Charterhouse generally supports with the identified Strategic Objectives at paragraph 2.43 of the consultation document, however, we consider that the 'a riverside city connected to its natural surroundings' Strategic Objective should have regard to the need for the creation of high quality built and natural environments to be consistent with the Framework.

Section 3: 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?

Firstly, Charterhouse considers that the housing provisions for the emerging Local Plan should be based upon the Government's standardised methodology for determining housing need. The standardised methodology and its application for determining housing requirements is clearly the direction of travel. The Government's response to the feedback on the Right Homes Right Places consultation confirms that the proposed standardised methodology approach is the most appropriate method and meets three key principles. These principles being it is simple, realistic and based on publicly available data. The Government in their response go on to state, *inter alia*, that the standardised methodology is a key part of the Government's ambition to increase housing delivery to rescue the country from the housing crisis. Accordingly, Charterhouse considers that the Council must adopt a housing requirement of 1,665 dwellings per annum in order to be consistent with emerging national planning policy and to ensure that the Local Plan is positively prepared.

Charterhouse fundamentally disagrees with the proposed Hoo Peninsula Rural Town strategy. What is more, there is no audit trail justifying why this approach was selected and the others discounted. We cannot see how this strategy is 'complementary' to the existing urban regeneration when much of this strategy will involve development on greenfield land. Accordingly, we do not consider this strategy effective. Further, the proposed development strategy is entirely reliant upon significant infrastructure delivery which will ultimately undermine site and affordable housing delivery. As such, we do not consider the Hoo Peninsula Rural Town strategy to be 'sound'.

Charterhouse consider that a sound alternative growth strategy involves a proportion but mixed approach. We consider that such strategy should make provision for urban regeneration, urban area expansion and rural settlement expansion. In pursuing such a strategy Charterhouse strongly advises the Council to consider the development potential of all the land between the Lower Rainham Road and the railway line located to the east of Yokosuka Way. This area is one of a limited number of locations across Medway which is unconstrained environmentally. Further, the area is situated in a sustainable location with excellent proximity to the adjoining urban areas and is well connected to the strategic highway network, which in term provides opportunities to deliver enhancements to public transport services locally. Accordingly, we consider this location capable of accommodating strategic development to meet the Council's identified housing need. Strategic growth here would be sustainable and would not result in any significant or demonstrable adverse impacts.

Charterhouse considers the draft wording of Policy DS1: Sustainable Development is appropriate, although would encourage the LPA to include the words 'without delay' after "*Planning applications that are in conformity... will be approved, unless material considerations indicate otherwise...*"

Within Policy DS2, Charterhouse objects to the development strategy for 'outside of the regeneration areas' which is based on delivering a small rural town based around Hoo St Werburgh. We are concerned the delivery of this strategy as the Hoo Peninsula has limited access and the existing network represents a major constraint to growth. Significant levels of investment will be required to achieve this strategy which is presently un-costed and unfunded. Future, the level of investment required to upgrade infrastructure could prohibit the rate at which development is brought forward placing a continuous strain on the Council's housing land supply.

Policy DS2 recognises the opportunity for lesser scales of development in suburban locations around Rainham. It is not entirely clear at this stage what scale the Council is envisaging and whether this is likely to include any of the land between Lower Rainham Road and the railway line which was previously being considered for mixed-use development by the Council in the January 2017 Development Options consultation. Charterhouse presumes not on the basis that none of the plans supporting the Development Strategy consultation identify the land controlled by Charterhouse as a 'Potential Site Allocation'.

Charterhouse considers that the emerging Local Plan must look favourably upon development on the land between Gillingham and Rainham. This area is relatively unconstrained, and it is not clear from the supporting evidence base why the Council dropped this location as a potential area of development.

Section 4: Housing

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

Charterhouse agrees that the Council needs to determine a housing target, such determination will need to take into account the approach to calculating housing need as advocated by Central Government.

As previously explained Charterhouse does not support the proposed strategic allocation for a rural town on the Hoo Peninsula. The strategy needs to be rethought and must include a strategic allocation on the land between Gillingham and Rainham, south of the Lower Rainham Road.

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

We are broadly in agreement with the proposed policy.

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?

Charterhouse supports the emerging threshold for contributions for affordable housing of sites of 15 or more residential dwellings. Further, we support the proposed percentage requirements for its provision which is a continuation of the LPA's existing affordable housing policy.

Although the North Kent Strategic Housing and Economic Needs Assessment suggests that 25-30% affordable housing delivery from eligible sites results in insufficient affordable homes to meet the full OAN, there is considerable risk that increasing the affordable housing percentage requirement will render schemes unviable. If the Council is minded to increase the percentage then Charterhouse would reasonably expect to see supporting evidence in the form of a Local Plan Viability Assessment.

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

The evidence base suggests that a tenure split of 60% (affordable rent) and 40% (shared ownership) is justified.

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

Charterhouse is supportive.

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?

Charterhouse is in agreement.

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?

The approach appears acceptable in principle as it reflects the advice contained within the Framework to “plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)” (paragraph 50). Prior to the Regulation 19 stage in the plan-making process, we recommend that the Council considers further the impact this policy intention may have on scheme/ development viability.

Question H14: Do you agree with the self-build and custom housebuilding approaches taken above?

Charterhouse broadly supports the approach being taken in respect of self-building and custom housebuilding provided any policy is not ‘draconian’ requiring an arbitrary percentage of self-build plots on residential sites over a certain size. Charterhouse supports the concept of self-build but only where specific self-build sites are identified.

Question H15: Do you think that the council should allocate specific sites for self/custom housebuilding development? If so, do you have any sites suitable for this use that you wish to promote for us to consider?

We encourage the Council to seriously consider this possibly. Expectations and a reliance on the development industry to deliver self/ custom build as part of major housing sites is not realistic. There is no control over the delivery of the self-build units. Plot purchasers will phase the

construction to a timeframe which best suits them which may give rise to blight and prolonged period of disturbance for other residents.

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

Charterhouse remains firmly of the opinion that self-build cannot realistically work alongside the delivery of mainstream housing. Accordingly, the council should focus on delivering specific sites for self-build.

Question H18: Following on from the question above, if a plot has been marketed (to the satisfaction of the council) for 12 months and not sold, we propose that it can then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market. Do you agree with this approach outlined above?

Notwithstanding our above comments, this could be an option worth considering. The Council would need to outline clearly within any policy what is expectation is for plot marketing and what is this involves.

Question H19: With regards to large sites of 400 dwellings or over, in order to prevent the completion of the overall site from being drawn out, exposing existing residents to extended periods of construction by their neighbours, we propose that if a plot is purchased by a self or custom builder, the dwelling must be built within 3 years of the date of sale, before being offered to other applicants on the self-build register to purchase. If there is no interest, then it may then be offered to the Council/Housing Association for purchase. If the Council or Housing Association do not wish to purchase the plot then it will be returned to the Developer to be built and/or sold on the open market. The onus would be on the developer to advise the council when each plot had been sold in order to monitor the development. Do you agree with this approach outlined above?

We consider that 3 years is long a time to allow a self-build plot purchaser the opportunity to complete the construction of the property. In the event that the plot is offered to another applicant would they be afforded a further 3 years within which to construct the property? In which case it could be up to 6 years before a self-build is completed! If the Council wishes to be prescriptive then self-build completion should be limited to 2 years. We consider a 2 year timeframe to be reasonable.

Charterhouse trusts the above comments will be taken into account and are considered constructive in assisting the Council move forward to the next phase of the Local Plan preparation. Charterhouse would be pleased to discuss further the merits of allocating the land south of the Lower Rainham Road and welcome any opportunity to do so.



CHARTERHOUSE

STRATEGIC LAND

Yours faithfully,



Oliver Taylor
Director

Enc. Site Plan

E: mail@charterh.co.uk

Question DS1

Upchurch Parish Council is supportive of the Council's approach to designate enough land to meet its housing needs to avoid speculative development on greenfield sites.

Upchurch Parish Council supports making the most efficient use of brownfield/previously developed sites and prioritising the development on these sites first.

As a broad-brush approach Upchurch Parish Council strongly support the creation of a significant 'garden town' style development on the Isle of Grain rather than the piece-meal in-filling of every piece of land along the A2 and Lower Rainham Road corridors. This strategic approach allows for the creation of the appropriate infrastructure, much of which is already in place with the creation of the Medway Northern Relief Road and reduces the impact on other communities in Medway and Swale, particularly those on the southern bank of the River Thames/Medway corridor of the alternative approach.

The Council is requested to give careful attention to the suggested expansion of Rainham towards the east, both north and south of the A2 corridor. Upchurch Parish Council would wish to protect the current separation between Rainham and the neighbouring villages of Upchurch (north of the A2) and Hartlip (south of the A2). The countryside between these settlements should be protected to prevent an amalgamation of built development. The landscape between the settlements should be protected or we risk the whole of the Medway waterfront becoming a single urban sprawl. Upchurch Parish Council consider the draft Proposals would be harmful to that separation, with the allocation of great swathes of countryside to the north east and south east of Rainham for development, the impact will be to effectively strangle our community and its way of life, these proposals would be objected to by Upchurch Parish Council.

Upchurch Parish Council are deeply concerned about the impact of the proposals to develop the land immediately south of the Lower Rainham Road. This often used route is, and always has been, a narrow country lane, with the further complications of a 20mph restricted section with narrowing and priority control and speed mitigations in part, from just over the border for approximately a mile to the junction with Bloors Lane and compounded by a second series of interventions within a further quarter of a mile with a traffic light-controlled sequence of restrictions at the Three Mariners Public House to control the flow in that narrow section.

The infrastructure is inadequate to deal with the current demand placed upon the road, in particular it becomes intolerable when there is additional stress on the A2/M2 corridor. At peak times queues build up with typical journey times extended to 45 minutes to 1 hour for the length of the road, instead of the appropriate 5 – 10 minutes. Upchurch Parish Council consider that the planned development, without the appropriate infrastructure in place beforehand, will lead to gridlock during construction works and access and egress will deteriorate further once the developments are in place and occupied, this change will significantly impact on the quality of life and economic prosperity of the parish.

Upchurch Parish Council are concerned that the current proposals in the Medway plan will lead to a sustained deterioration in the quality of life and economic sustainability of our community.

Upchurch Parish Council foresee a number of negative impacts on our community created by Medway's proposals and we are deeply concerned there will be a disproportionate impact on the elderly and the youngest members of our community.

Upchurch is a small community with nearby essential services which are barely adequate for our own needs, an increase in the nearby population and the associated traffic will place a further strain on those services. Stress on our fundamentally rural highway network of small often winding country lanes that were designed by the agricultural environment of the past, not designed to cater for, or cope with the volume or nature of traffic, especially HGV's seeking 'sat-nav' alternative routes. The increased noise, both in volume and duration starting, earlier in the morning and sustained in volume and frequency until later at night is likely to have an impact on the sleep patterns of our community with the well documented negative impact on the quality of life that is associated with that.

The urbanisation of the Lower Rainham Road corridor will increase the vehicles using that route and we are concerned about the impact on air quality, especially as the route passes the village school. Upchurch Parish Council would expect Medway Council to have within their plan, sufficient mitigation to ensure that their developments do not produce any further deterioration in air quality and would ideally seek an improvement over time.

Many of our residents are dependent upon the local bus and rail public transport services, in particular the bus services to Medway Maritime Hospital which provides a range of vital medical services for our community, especially our elderly and less mobile residents. The journey to the hospital is already lengthy and inconvenient, a situation we believe will be exacerbated further by these proposals. Journey times to hospital and out-patient services will be increased and it seems inevitable that will have a negative impact on the overall health of the community and for some individuals it could have life changing consequences.

Question H20

Upchurch Parish Council is impacted by considerable gypsy encampments within and surrounding the Parish, with many illegally sited caravans and associated domestic paraphernalia. Neighbouring the Parish is the area of Matts Hill Road which has seen a significant change in recent years – with the destruction of wooded areas and the proliferation of gypsy sites, changing the character of the area considerably from a rural farmland setting, to a suburban sprawl of mobile homes, hard surfacing, high fencing and gates. The Spade Lane development, to the south of the A2 (just inside Hartlip Parish), which Swale Borough Council are objecting vigorously too, along with a large number of other sites both permanent and illegal transitory camps within the area, in particular very close to the boundary between Upchurch Parish and Rainham, between Otterham Quay Lane and the Riverside Country Park have also significantly impacted upon the landscape and the wellbeing of residents local to the sites, and within the small retail area within our village.

In light of this proliferation of Gypsy and Traveller encampments affecting the rural area within and surrounding Upchurch, the Parish Council's view is that the draft policy is not strongly worded enough in order to avoid the negative impacts of such developments within the rural area and in particular close to our Parish boundaries. The Local Plan policy should state that such developments should not be supported within the rural area, especially where there would be landscape and other impacts. We appreciate this may on the face of it appear to contradict PPTS15 [national policy] which encourages G&T away from urban into rural areas [unless designated] as it notes the differing

lifestyles of the settled & unsettled communities, however, we believe the key is proportionality and balance and at the moment our perception is this local plan lacks that balance and is weighted too much in favour of the Gypsy and Traveller communities at the expense of the settled community.

Question NE4

The Parish Council considers that draft policy NE4 is not strongly worded enough to prevent developments which could detrimentally affect the landscape character of the rural parts of the Authority area. Greater protection should be afforded to the rural areas – proposals should preserve and/or enhance the landscape.

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 12:54
To: futuremedway
Subject: Future building plans

Categories: Blue Category

To whomever it may concern.

I have just found out about the future local plan. We have recently moved to the area, and chose to buy a house in Hoo St Werburgh for the surrounding beautiful countryside. I am so very disappointed to hear about the vast amount of housing being proposed to be built. Whilst I appreciate the need for more housing, I feel the amount of housing being considered for one area is way too much. Already with the new estate being built up the top of Bells lane by Bellway and Deangate ridge plans and now Hoo peninsula the local infrastructure can not cope with it. There are not enough shops, supermarkets, sports and leisure facilities, hospitals, GP and dental practices at present to cope let alone with that amount of houses being proposed. We do not want this beautiful countryside ruined anymore. I strongly oppose these plans.

Regards

Samantha Gainfort

25 June 2018

FAO: Catherine Smith
Planning Policy
Regeneration, Culture, Environment & Transformation
Medway Council
Gun Wharf
Dock Road
Chatham
ME4 4TR

67–69 George Street
London, W1U 8LT

By Email

By email: futuremedway@medway.gov.uk

Our reference: I-rkm-reg18 rep-190618

Dear Madam

MEDWAY LOCAL PLAN 2012-2035 DEVELOPMENT STRATEGY DOCUMENT

We are instructed by the University for the Creative Arts (UCA) to submit representations to the Medway Local Plan 2012-2035 Development Strategy Regulation 18 consultation document (hereafter referred to as the 'draft Local Plan').

This letter follows representations we submitted previously to the Medway Local Plan consultations in February 2016 and April 2017. This letter of representation should be read in conjunction with our earlier representations.

Context

UCA is the number one specialist university for the creative industries and a top 30 university in the UK. It is the second largest provider of arts education in Europe and this year, 2018, is celebrating its sesquicentenary (150 years) of providing unparalleled creative education.

UCA has historic origins in Surrey and Kent, growing out of a collection of small art schools in the surrounding local areas. It dates back to the Victorian era, with the establishment of the Guildford School of Art in 1856 and the Farnham School of Art in 1866. It has evolved over time, as it has merged with other art schools to eventually form UCA when it was afforded full University status in 2008.

UCA has continued to thrive and grow and it has nurtured many unique communities of artists, designers, architects, writers, animators, filmmakers, illustrators, photographers, actors and more over its time. It is home to a number of leading alumni, including Karen Millen, Tracey Emin, Gareth Edwards (Director of Godzilla and Star Wars: Rogue One), Martin Hanford (creator of 'Where's Wally') and Dame Zandra Rhodes.

The Rochester Campus (the Campus) itself is one of Rochester's cultural venues, hosting important exhibitions and contemporary art and design events throughout the year. The Campus is located at the top of Fort Pitt Hill Road and is comprised of a 9 storey stepped building. The site is accessed via Fort Pitt Hill which connects to New Road (A2) to the north and Albany terrace to the east. The current entrance to the campus, which is at the centre of the South elevation is not visible on the approach to the site.

Representations

The Plan recognises Medway as a University City and the economic opportunities associated with higher and further education.

We set out our representations to the plan below:

1. Paragraph 5.15

The employment section of the Plan refers to the importance of the creative and digital sector as a high value sector, which is supported by the presence of UCA within the borough. UCA welcomes the importance placed on the creative sector and the importance of UCA but notes that UCA is incorrectly referred to as “University for Creative Arts” and should be corrected to “University for the Creative Arts”.

This paragraph of the plan also identifies that, in order to support the retention of UCA’s graduates, there is a requirement for studio style units in urban areas. However, the term ‘studio style’ does not infer that the unit will be for starter businesses or will be low cost, which is part of the requirement for young businesses and spinouts. UCA therefore requests that this paragraph is amended to refer to ‘incubator’ or ‘low cost’ units, rather than studio style units.

The University is highly attractive to industrial partners because the students are sources of inspiration and innovation, whether by means of placements, live projects or creative residencies. Companies UCA’s courses are associated with, and who give their time to engagement, include: Apple, BBC, British Film Institute, CNN, EA Games, Kodak, Sky Television, Sony, and Vodafone.

2. Policy H5: Student Development

Paragraphs 47 and 50 of the National Planning Policy Framework (NPPF) states that local plans should ensure they meet the area’s objectively assessed need and that this should include the needs of different groups in the community. Planning Practice Guidance (PPG) makes clear that student accommodation should count towards the Councils housing target. Proposed changes to the NPPF (March 2018) seek to bring the NPPF in line with PPG by clearly stating this should include student housing. Therefore, to be consistent with the NPPF and PPG, the Local Plan should ensure sufficient student housing is provided.

UCA support the express recognition given at Policy H5 student housing being predominantly located close to higher education establishments, or within areas well served by public transport and accessible to a wide range of town centre, leisure and community uses. However, UCA and the Universities at Medway Campus are located in different parts of the borough and any proposals or sites will need to be correctly identified so that they are in close proximity to both Campus’ and are served by reliable and frequent public transport.

Further to our comments in 1. above, UCA is also incorrectly referred to in paragraph 4.35 and this reference should be updated.

3. Chapter 10 and Paragraph 10.11

The plan recognises the importance of further and higher education establishments and the social and economic impacts they generate within the Borough. The plan also refers to the importance of the creative and digital sector as a high value sector, which is supported by the presence of UCA. However, the draft Local Plan makes no reference to UCA within Chapter 10 as one of Medway’s higher education providers.

We suggest a sentence be added to the end of paragraph 10.11 to refer to UCA as an important higher education provider within Medway. Possible wording could be as follows: *“The University for the Creative Arts is also located at Fort Pitt Hill and is at the southern tip of the Rochester Riverside regeneration area”*.

4. Policy T1: Promoting Sustainable Transport

This policy is supported in-principle, however UCA would like to see greater recognition of the need for Medway Council to increase spending on public realm and transport improvements. In particular, UCA would like better links to the Campus, which would in turn be beneficial to the economic growth and to the high value creative and digital sector of Rochester.

In particular, UCA would like to see the repair of Fort Pitt Hill as the repair and maintenance of this road is important to UCA and the wider Fort Pitt area.

Conclusion

UCA welcomes the recognition given in the draft Local Plan and Medway 2035 and the importance of higher education in Medway. We would welcome the opportunity for further discussion and engagement with the Council to discuss the issues raised in this letter to ensure that the Local Plan and Medway 2035 capitalise on the full potential of UCA.

Please would you acknowledge receipt of this letter of representation. We reserve the right to supplement this letter at a later date.

Yours faithfully



Henrik Dorbeck
For and on behalf of Porta Planning LLP

From: [REDACTED]
Sent: 25 June 2018 13:12
To: futuremedway
Cc: gilbert, tom
Subject: Public Health's response to the Development Strategy

Importance: High

Categories: Blue Category

Dear all,

Please find Public Health's response below. The highlighted sections are additional to the text presented in the document.

Comments on overview:

- A clearer understanding of Planning's use of the term 'healthy' is required.
- People will be confused with Chatham being called a city when its always been Rochester - we need to be clearer about what we are trying to achieve. we suggest the impact of place shaping on connecting communities to reduce social isolation amongst specific groups in our population should be highlighted
- Reduction of health inequalities, development of dementia communities, and the improvement of the physical, and mental health, as well as wellbeing, of our communities are recognised within the vision (2.15, Cultural Strategy priorities 2.21, developing a vision - page 19). However they are not linked as a golden thread throughout the whole document although some policies are thorough. For example there is an inconsistency of links between the impact of green /natural space and the wellbeing of communities (2.40). Under 'quality of life' page 22 (2.30) 'a quality environment can boost the economy' could easily add **and positively impact on the health and wellbeing of the communities.**
- Overall the strategy would benefit from Public Health's contribution at all stages to embed health within all policies so we can demonstrate to the Planning Inspectorate how we will reduce health inequalities. We would urge that this is considered when compiling the Draft Plan.

Page 4:

The council has assessed that the strongest means of securing the infrastructure improvements needed in Medway, is through strategic scale development linked to upgrades to transport, education, health **and wellbeing** and wider services to enable new housing.

Page 11:

2.2 End of paragraph addition - In contrast to other areas in Kent, much of Medway's growth is from natural change, with births outnumbering deaths. This shows through in demand for health and education services.

Page 12 2.4 There are marked inequalities in health, with life expectancy shorter for our residents.

Not sure we can use this term, we need to use context> when benchmarked with CIPFA peers life expectancy in medway is not the worst! Probably better to say health life expectancy and healthy life expectancy is lower in medway than many areas in the South East

2.16 – the STP is not a draft any more

Q DS1:

Answer: DS1 is not clear and open to being misconstrued. Many words can be perceived as planning jargon.

Examples:

1. what is a 'positive approach'? Positive meaning health will be a major consideration? This section would benefit from an explanation of the balance of the various factions, regeneration, housing, etc?
2. What is 'material consideration'? would health and air quality be less of a priority(material consideration) to regeneration and housing need?
3. 'Any adverse impact . . . outweigh the benefits' what are the benefits? and are the adverse impacts pertaining to health, air quality, environment or the housing need?

The question goes on to ask for a sound alternative growth strategy and we supply a link to one for your consideration; <https://www.planningni.gov.uk/index/policy/rds2035.pdf>

This example gives a clear understanding of the balance of factors where as Medway's Development Strategy implies the Pareto principle is applied with regeneration/housing at 80% . Until we have a better understanding Public Health are not able to agree with this policy.

Housing

Q H1, H2, H3 – yes, H4 leave unanswered. H5 yes,

H6 Public Health supports this policy. Dementia Friendly communities/retirement villages/extended extra care if correctly designed and implemented apply the recommendations listed in the HAPPI report (4.23)

H7 yes, H8 agree, H9 yes, H10, H11, Public health would like added to the list of favourable considerations ' Do not adversely affect the health and wellbeing of the residents (new and existing)'

Hh12 yes

H13 yes

H14 yes H15 no, H16 yes but have no view on % of site allocated.

H17 yes, H18 yes, H19 yes, H20 yes, H21 yes when the proposed criteria is met

Employment

There is no mention of employment being a determinant of health and therefore the correlation between employment and wellbeing is not immediately apparent and yet this knowledge would inform decisions.

E1 yes, E2 all opportunities should be explored. E3 yes, E4 yes, E5 yes E6 yes E7 yes, E8 yes

Retail and Town Centres

RTC1, RTC2, RTC3, RTC4 - all yes, RTC5 no RTC6 yes, RTC7 , 8 , 9, 10,11, 12, 13, 14 yes. 15 strongly support, 16, support

RTC17 and 18 Yes specifically A3 and A5 RTC19 No - there needs to be an evidence based policy

RTC20, 21, 22, yes

RTC23, 24, 25, 26 – yes

RTC 27 yes although the word 'healthy' may have a different connotation here to human health and needs explaining

RTC28 – but with a restriction on A5 (and possible A3)

RTC29 – yes

Natural Environment and green belt

NE1: This section is lacking mention of the health benefits the natural environment and green belt give. Therefore Public health recognises the importance of maintaining them. As a policy around 'managing the habitats', yes we agree

NE2, 3, 4: yes

NE5. This is the only section where health benefits are touched on. We would like to see 'positively benefiting health and wellbeing' as a principle underpinning GI planning. We would like to policy to be stronger/more hard hitting and have more teeth.

NE6 , 7– yes

NE8 – where is the policy and question on noise pollution? It is only mentioned that the Council will assess as part of the Draft Local Plan. The approach to noise pollution and mitigation should be within this document for comment.
Air Quality – yes

Built environment

BE1 –high quality design is key and should have a Health Impact Assessment supporting all major developments to ensure we reduce health inequalities and ensure public health and access to health care is considered at every opportunity (under HC1)

BE2 yes

BE3 stronger wording required: hedges, trees, green wall, roof top gardens and other natural features must be included in the design to ensure the health and wellbeing of the residents are ensured, as well as providing a positive mitigation to air pollution. Design on dementia friendly developments should be included. As should provision for food growing.

BE4 – yes

Q BE5 – BE5 Policy should be stronger - **enhance** the historic environment through development. BE6 policy – yes

Health and communities

At draft plan stage we recommend the wider determinants rainbow be used to demonstrate what the plan looks to tackle: <http://jech.bmj.com/content/jech/64/4/284.full.pdf#>

Consistence of language HFT or high energy food outlets...? HEFO covers dessert shops and other beasts of a similar nature that as yet are unheard of. PH suggest we go with both HEFO and HFT for now and during the draft plan development a small group of experts planning and PH discuss and agree definition and classification?

HC1, 2, 3 – YES HC4 - proposal is a sound approach

HC5 yes and yes

Infrastructure

I1 – needs to have air quality mitigation and strategies embedded in this policy

I2 – yes

I3 – yes

I4 – yes but where is E V charging?

I5 – yes

I6 – yes

I7 – yes – yes relocate and where an appropriate site can be found and agreed

I8 – combined community facilities, educational and leisure

Transport

T1 – the wording could be stronger showing that we need to sustainable travel for health as well as air quality reasons. The Local Plan needs to nudge behaviour change.

T2 – Agree in principle but disagree with point 11.12 – Development can offer financial solutions for providing sustainable transport to peripheral areas

T3 – agree

T4 – yes to all

T5 – Developers should be encouraged to consider proposing innovative sustainable solutions and Planning Authority should have an overarching on achieving this by 2035.

T6, T7, yes

T8 - 11.38 demonstrates a good link to health - agree to policy

T9 yes

T10 - as much use and access to the riverside should be sought and encouraged

T11, 12 yes

T13 – strongly support. ensure all local transportation offer, including buses and taxis, move to electric or low emission throughout the towns

T14 – yes

T5 agree to T12 as a policy but there is no evidence dockless bikes work, however all sustainable travel options should be considered (reword to phase more positively)

Minerals

MWE1 – not the most sustainable approach but necessary. What is Medway's long term strategy to future proofing our limited mineral resources and should we not look to the secure a feasibility study on the current provision's impact on the environment long term.

MWE2 – yes

MWE3 - yes

Kind regards

Su

Su Ormes | Public Health Programme Manager:Wider Determinants of Health

Public Health Directorate
Medway Council
Gun Wharf
Dock Road
Chatham
ME4 4TR. [REDACTED]

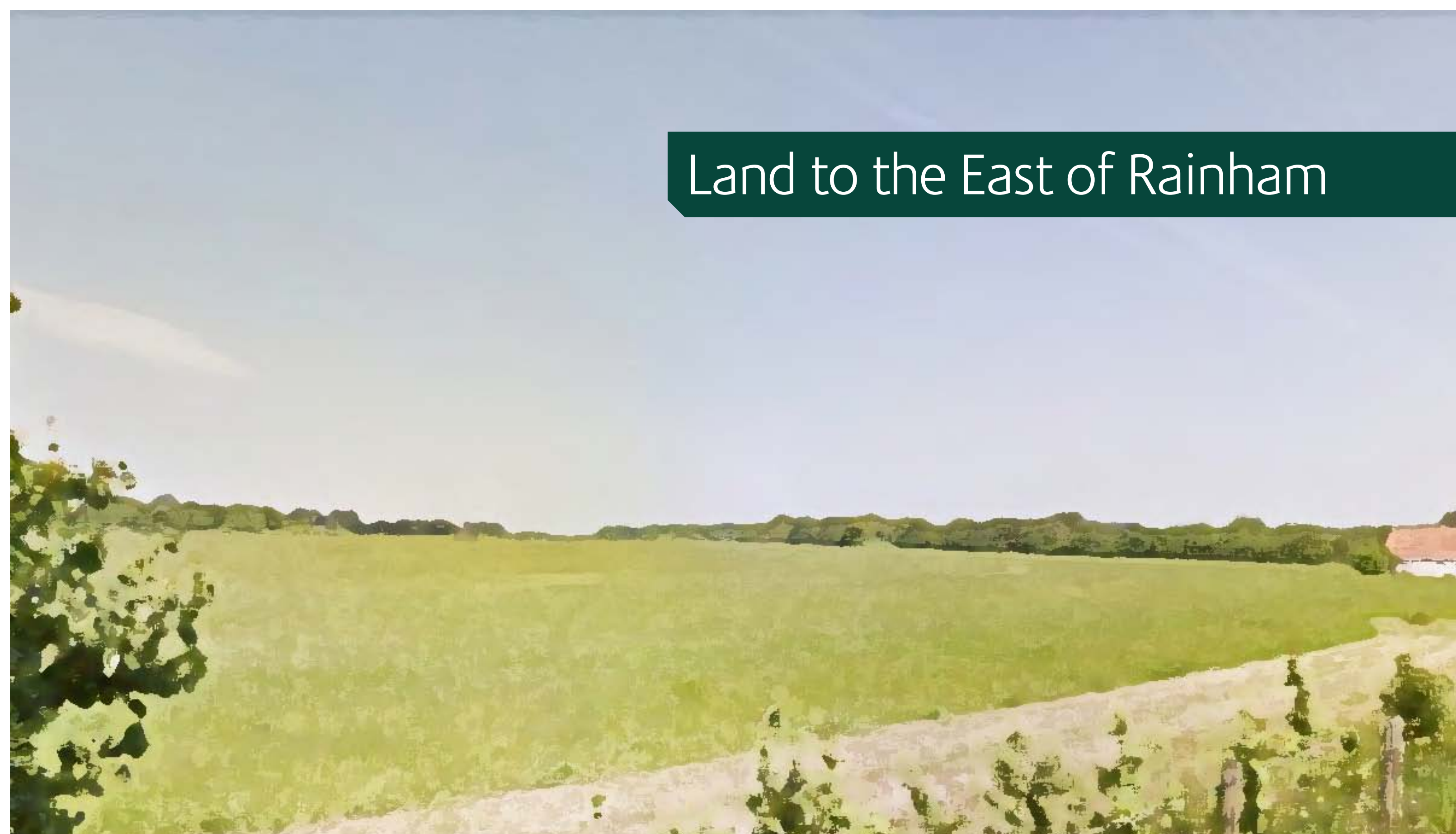


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Land to the East of Rainham



Vision Statement

Bellway

Introduction

Bellway Homes are delighted to put forward this submission for an exciting opportunity to create a sustainable urban extension to the eastern edge of Rainham.

This document sets out the following:

- Our Vision
- Planning Strategy
- A description of the site
- Identification of the site's constraints and opportunities
- Development Concept
- Transportation and highways issues
- Capacity study
- Landscape Framework
- The background to Bellway
- Bellway's track record in the region





Our Vision

The vision for the development site is to create a sensitive, high quality and distinctive residential development as a sustainable extension to the eastern edge of Rainham.

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- Achieving a high quality, attractive environment with good public realm and amenity space;
- Retaining and integrating public rights of way within and around the edges of the layout;
- Responding to the sensitivity of Meresbough Road with appropriate landscape buffers;
- Forming a development with a strong sense of place where people will want to live;
- Integrating the proposals with the approved Redrow scheme;
- Creating a good mix of accommodation to create a diverse community for people of all ages;
- Providing affordable housing to meet local need;
- Exploring the opportunity to provide a new facility to enhance the sense of community in this part of the town;
- Providing a safe and secure environment by minimising opportunities for crime and discouraging anti-social behaviour;
- Creating a permeable layout for ease of movement, together with good links between the site and the surrounding area;
- Providing attractive landscaped open space for informal recreational amenity, formal sporting space and children's play
- Minimising the visual impact of accommodating parking standards.; and
- Providing modern facilities and using contemporary building techniques having regard to current sustainable design requirements.

Planning

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Comments on the Development Options

Vision and Strategic Objectives

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

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

'A place that works well'

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

'A riverside city connected to its natural surroundings'

- To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development.
- To address the challenges of climate change, seeking adaptations and opportunities to promote carbon reduction and mitigation measures, and reduce the risk of flooding;
- To ensure the effective management of natural resources, including water, air and soil, and the sustainable supply of minerals and appropriate management of waste.
- 'Medway recognised for its quality of life'
- To reduce inequalities in health by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public realm design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of local services and dementia friendly environments;
- To provide for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs;
- To strengthen the role of Medway's town, neighbourhood and village centres, securing a range of accessible services and facilities for local communities, and opportunities for homes and jobs, with Chatham providing the focus for new retail and community facilities.

'Ambitious in attracting investment and successful in place making'

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

We support the principle of the objectives and the foundations of the emerging plan. However, we would continue to suggest some minor modification is needed to ensure the plan is positively prepared and fully aligned with the provisions of both the current and emerging National Planning Policy Framework (NPPF). Specifically, we consider objectives should be modified to provide more certainty that the scope to provide the full 37,000 home housing target will be fully explored if Medway is to secure its role as a vibrant city (rather than a collection of merged towns).

We consider the housing objective should be modified to read:

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

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

Given Moor Street, Rainham is one of the most natural and sustainable locations to extend existing settlements, and does not fall within the Green Belt nor a nationally protected landscape, sensitively designed development could be adequately accommodated.

Response to Development Scenarios

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

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

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

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

Scenario 1 does not promote the release of land at Moor Street, Rainham.

2. Investment in infrastructure to unlock growth

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

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

Scenario 2 does not promote the release of land at Moor Street, Rainham.

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

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

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

Scenario 3 does potentially include the release of land at Moor Street, Rainham.

4. Development of Lodge Hill SSSI

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

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

Scenario 4 does not promote the release of land at Moor Street, Rainham.

Planning

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

Without the consistency, there is a genuine risk of selecting the right strategy with the wrong housing target or vice versa. In addition, and fundamental to whether the plan can be regarded as sustainable there could be issues with failing to consider properly the need for infrastructure, employment, services and community facilities which will result in potential for issues arising due to lack of education, health provision, housing and jobs. We are also concerned that instead of addressing some of the currently poor indices of deprivation, a plan that fails to properly plan for objectively assessed needs could serve to worsen some or many of the indices by not matching housing and infrastructure/community facility needs.

For the avoidance of doubt, we consider the options that should be considered should more accurately be presented as follows:

1. Scenario 1 should consider how 37,000 homes can be achieved primarily by focussing housing on brownfield urban sites, the development of a rural town on the Hoo peninsula with additional suburban expansion. This option should therefore be expanded to include additional sustainable land such as Moor Street, Rainham.
2. Scenario 2 presumably should takes a similar approach to scenario 1 and should consider how 37,000 homes could be delivered, but with a greater emphasis on infrastructure to support the delivery of the Hoo peninsula, a faster rate of delivery and reduced reliance on suburban sites. Nevertheless, given some suburban growth is needed, it should still feature Moor Street, Rainham and wider extension to existing settlements.
3. Scenario 3 should focus how 37,000 homes can be accommodated with greater emphasis on suburban growth;

4. Scenario 4 focus should factor in the potential for growth at Lodge Hill to accommodate the 37,000 homes, but should not prohibit sustainable land such as Moor Street being brought forward to support short term delivery.

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

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

Notwithstanding that we consider further work is needed, we favour a strategy based upon an increased mix of urban and suburban sites to support growth at Hoo. Caution must also be had to the reliance upon the creation of a rural settlement on the Hoo peninsula, which would account for over a third of the councils proposed housing numbers. If this approach is to be followed, the level of urban and suburban sites must be significant enough to deliver constant delivery of housing whilst key planning principles and infrastructure is considered. Likewise, the Council continues to put too much emphasis on Lodge Hill despite the ongoing question marks over its suitability and delivery. If this site is to be included, the plan requires sufficient flexibility to ensure it will not be undermined if the site is delayed.

In short, we consider that Medway must prioritise genuinely deliverable sites such as Moor Street, Rainham given the logical nature of the release of what is a sustainably located edge of settlement site.

Delivery Concerns

We are concerned that the scenarios presented do not have enough regard to delivery and legacy. For example, a strategy dominated by small to mid-sized sites disbursed throughout the suburban areas may not generate the critical mass required for significant improvements to infrastructure (schools, highways and healthcare) to benefit existing and new communities. Careful infrastructure planning is therefore needed to ensure that development impact is mitigated in a coordinated way.

A geographical spread of sites is advantageous and promotes a steady delivery of homes throughout the authority area, which if part of a coordinated strategy, would assist with delivering a good mix of units. In contrast, strategic development of an area such as Hoo Peninsula would deliver a larger 'pot' of money to invest in new physical and social infrastructure, but would also place much greater burden on existing resources. Furthermore, whilst development of a scale of several thousand houses will generate large income directly related to the development, it will not generate the funds needed to mitigate against the cumulative levels of development within the area.

Consideration must also be given to how sites are delivered. Traditionally, strategic sized regeneration based housing sites are complex and often delayed. Accordingly, it does not follow that development will be delivered at the maximum and quickest rates possible, particularly if there are changes in market conditions. For this reason, regard must be had to the value and contribution of sites controlled by developers such as Bellway, with a track record of delivery.

In summary, the need to facilitate a steady supply of homes supports a strategy that is based upon a range of size sizes, types and locations.

Site Description

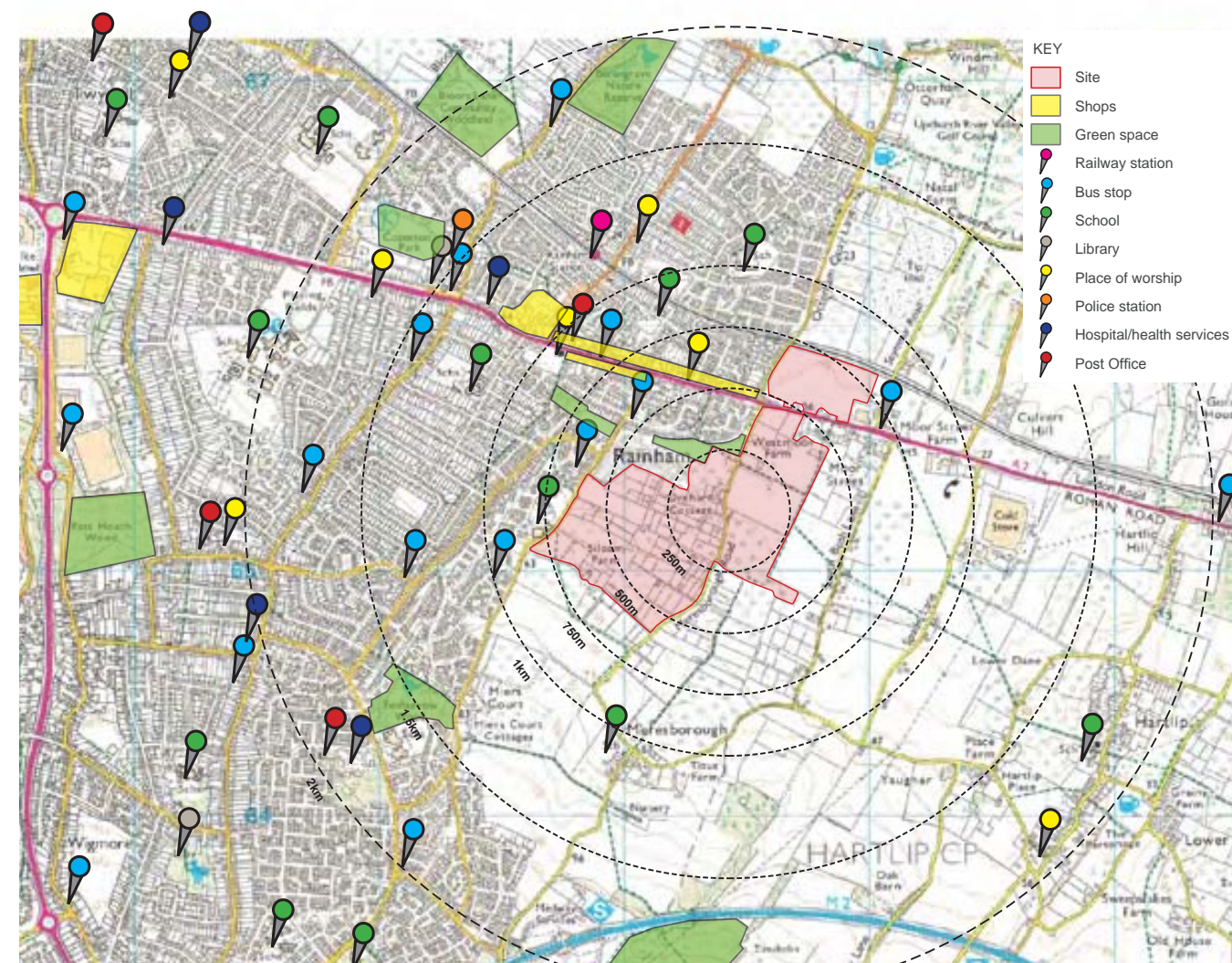
8

The site is located on the eastern edge of Rainham in Kent. The site extends from land adjacent to the railway line at its northern edge, straddles Moor Street (A2). The site lies on both sides of Meresborough Road which runs north-south, and to the east of Mierscourt Road which connects to the A2 at its northern end. Meresborough and Mierscourt Road have the character of a rural lane.

The overall site area measures a total of 62.26 hectares and currently comprises a mix of former agricultural fields, horticultural nurseries and orchard together with Orchard Kennels.

Vehicular access to the site will be directly from the A2. The site is located close to the facilities within Rainham including a number of primary schools.

The High Street offers a range of facilities within walking distance from the site. These are indicated on the local facilities diagram below.



Local Facilities Diagram



High Street



(1) Looking west from Meresborough Road



Heath Centre



(2) Looking south east from Meresborough Road



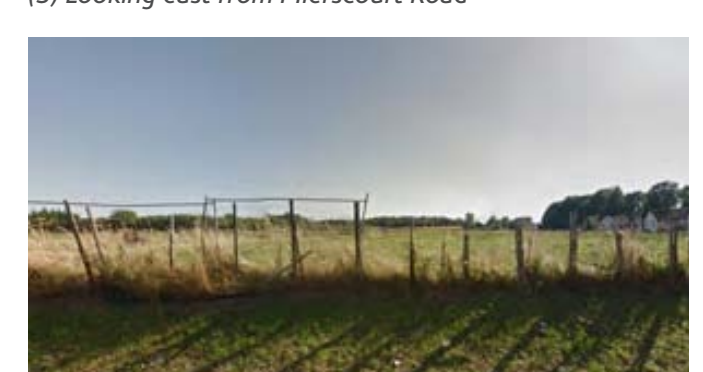
Rainham Station



(3) Looking east from Mierscourt Road



St. Margarats Infant School



(4) Looking south from Moor Street (A2)



(5) Looking south from Moor Street (A2)



(6) Looking east from Meresborough Road



(7) Looking west from Meresborough Road



(8) Looking east from Otterham Quay Lane



Aerial photograph of the site with boundary marked in red (not to scale)

Site Constraints & Opportunities

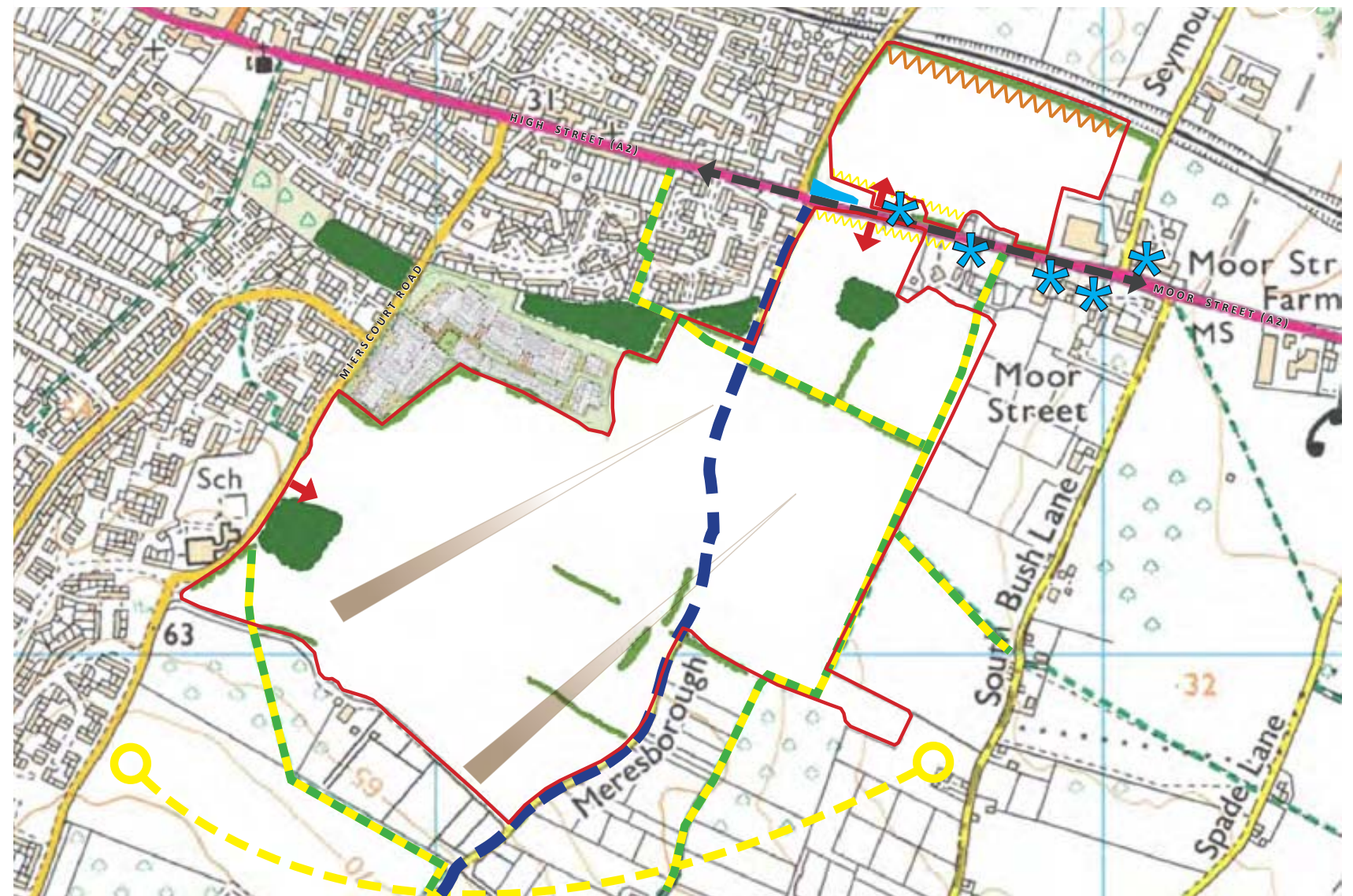
10

In promoting and explaining the proposals to the Local Planning Authority it will be important to demonstrate the development of the scheme from clear design principles which are embedded in the site and local context. The design team that would work with Bellway have extensive experience in developing similar sites as urban extensions to existing settlements.

The physical issues associated with the site and its context will inform and constrain the development of the masterplan for the eastern extension to Rainham. Some of the issues include the following:

Constraints

- Limitations on access and connectivity to the local highway network
- Topography
- Any important existing trees and hedgerows on the site
- Relationship to existing edge of Rainham
- Relationship of development to the adjacent rural edge
- Relationship to existing properties on Moor Street, Meresborough Road and Mierscourt Road
- Relationship to approved Redrow development
- Existing public right of way network
- Character and capacity of Mierscourt and Meresborough Road
- Noise from railway line along northern edge of site
- Traffic noise from A2



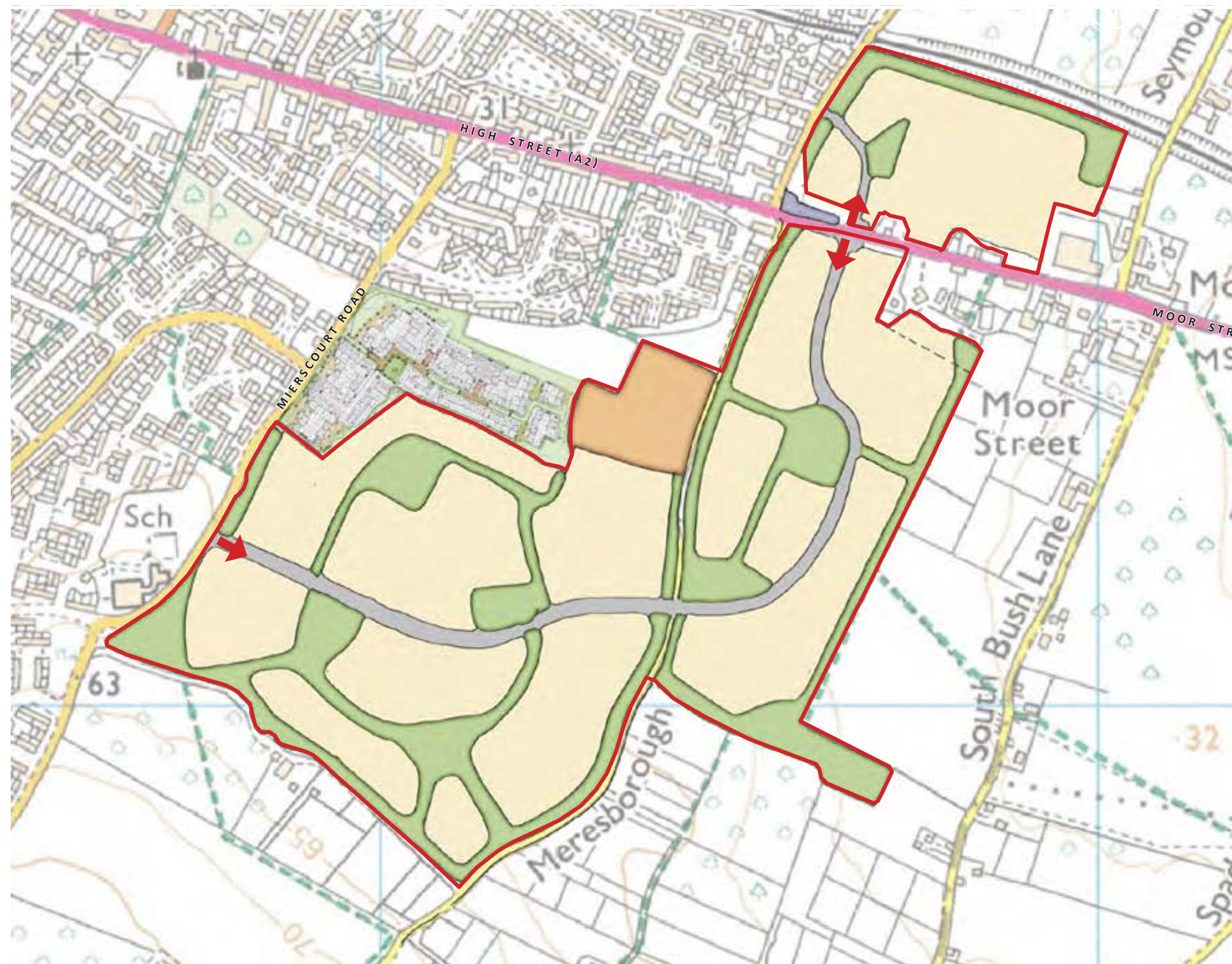
Constraints plan

- | | |
|----------------------------------|----------------------------------|
| Site Boundary | Existing tree rows / hedgerows |
| Meresborough Road | Noise from railway line |
| Moor Street (A2) | Traffic noise from A2 |
| Vehicular Site Access | Existing residential development |
| Public Right of Way | Listed building |
| Existing woodland / dense shrubs | General slope across site |
| | Sun path |

- Site Boundary
- ↔ Vehicular Site Access
- Residential blocks
- Community use
- Open space
- Infrastructure

Opportunities

- Potential to provide a significant number of new homes to assist in meeting housing need and avoiding development on more piecemeal sites within the district
- Potential to create a more appropriate transition from the urban edge of Rainham to the wider countryside
- Potential to provide a significant number of affordable homes to meet local housing need
- Potential to provide a network of accessible recreational open space on the eastern edge of Rainham to benefit the local community
- Opportunity to create an attractive and safe network of routes between the existing urban edge and the wider countryside
- Potential to help resolve some local transport and highways issues
- Potential to provide a local facility to enhance the sense of community in the local area



Opportunities plan

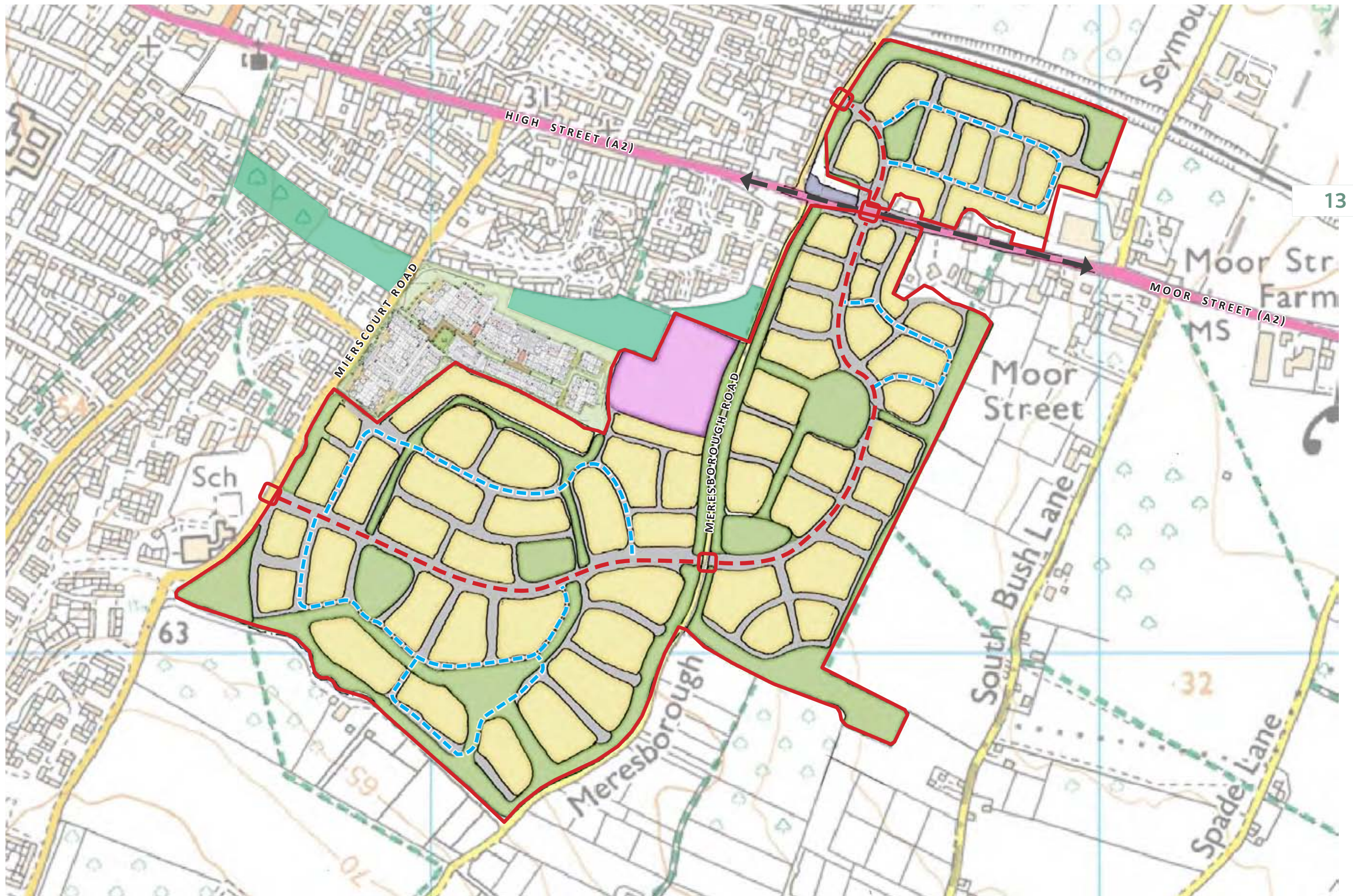
Development Concept

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The development concept for the site comprises the following features:

- A coherent urban extension to the eastern edge of Rainham
- Good connectivity to the eastern edge of Rainham and existing facilities
- Access to the site which minimises impacts on the existing community
- A movement network which forms a strong framework for the development
- Landscape buffers to retain the character of Mierscourt and Meresborough Road
- A landscape framework creates a safe and attractive pedestrian and cyclist movement network
- Delivering new and improved social landscape and physical infrastructure
- Incorporation of new facility to foster a broader sense of community
- Deliver open market and affordable housing to meet local need

- Site Boundary
- Residential Block
- Open space
- Community Use
- Infrastructure
- Existing local Open Space
- Existing residential
- ↔ Moor Street (A2)
- Primary spine road and key junctions / highway events
- Illustrative Secondary Street network



Transportation and highways issues

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An indicative access strategy for the site has been identified to ensure safe and suitable access by all modes, and also to try and alleviate/minimise existing congestion issues elsewhere on the local highway network. For development of this scale, a minimum of two points of access are required, and initial designs confirm that access could be provided via a new signal-controlled junction at Moor Street, along with a T-junction or roundabout arrangement from Mierscourt Road. These two accesses would be connected by a link road through the site, most likely with a roundabout located within the site to serve the internal roads and connect to Meresborough Road as it extends south.

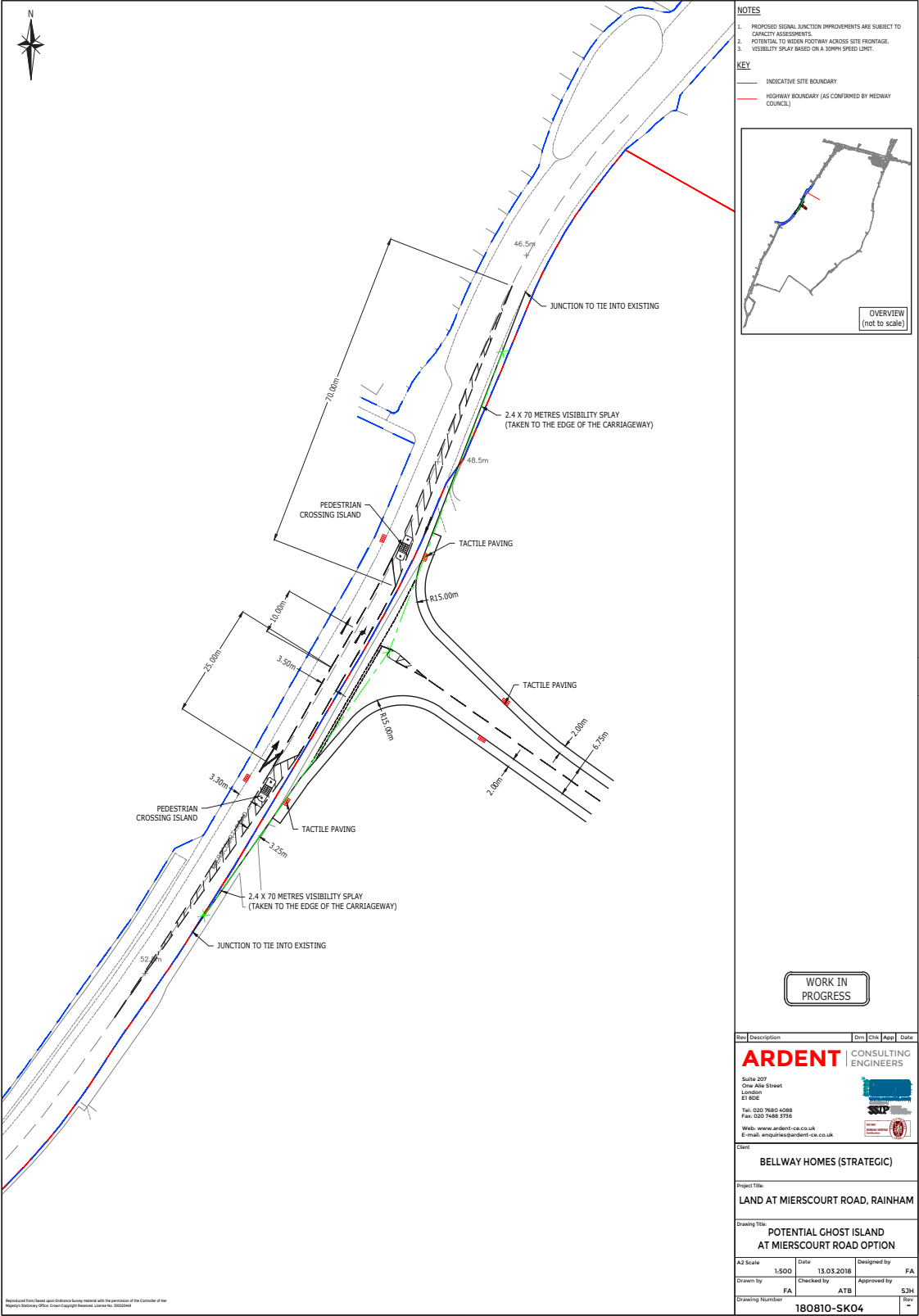
At present, evidence from modelling included with recent planning applications confirms that there are congestion issues at the Moor Street/High Street/Otterham Quay Lane/Meresborough Road signals, and also the High Street/Mierscourt Road signals further west, as well as other junctions further afield on strategic routes (including to and from the M2 at Junction 4). The development would offer the opportunity to alleviate this congestion by providing another alternative route to bypass these junctions, thereby diluting the amount of traffic through specific junctions. The precise strategy can be tailored to meet specific demands once further analysis and modelling has been undertaken, but the principle of the new link road through the site offers an excellent opportunity to address existing strategic traffic issues in the local area.

To facilitate access from Moor Street, there may be a requirement to stop up the existing access to Meresborough Road and provide alternative access from within the site, which can be reviewed in further detail as part of any future assessment. Should the land to the north of Moor Street also be developed, a signalised access could also be provided to serve this land, and depending on the quantum of development there may also be the opportunity for a new link road to Otterham Quay Lane, thereby further helping to alleviate existing capacity issues at the signal junction on this road.

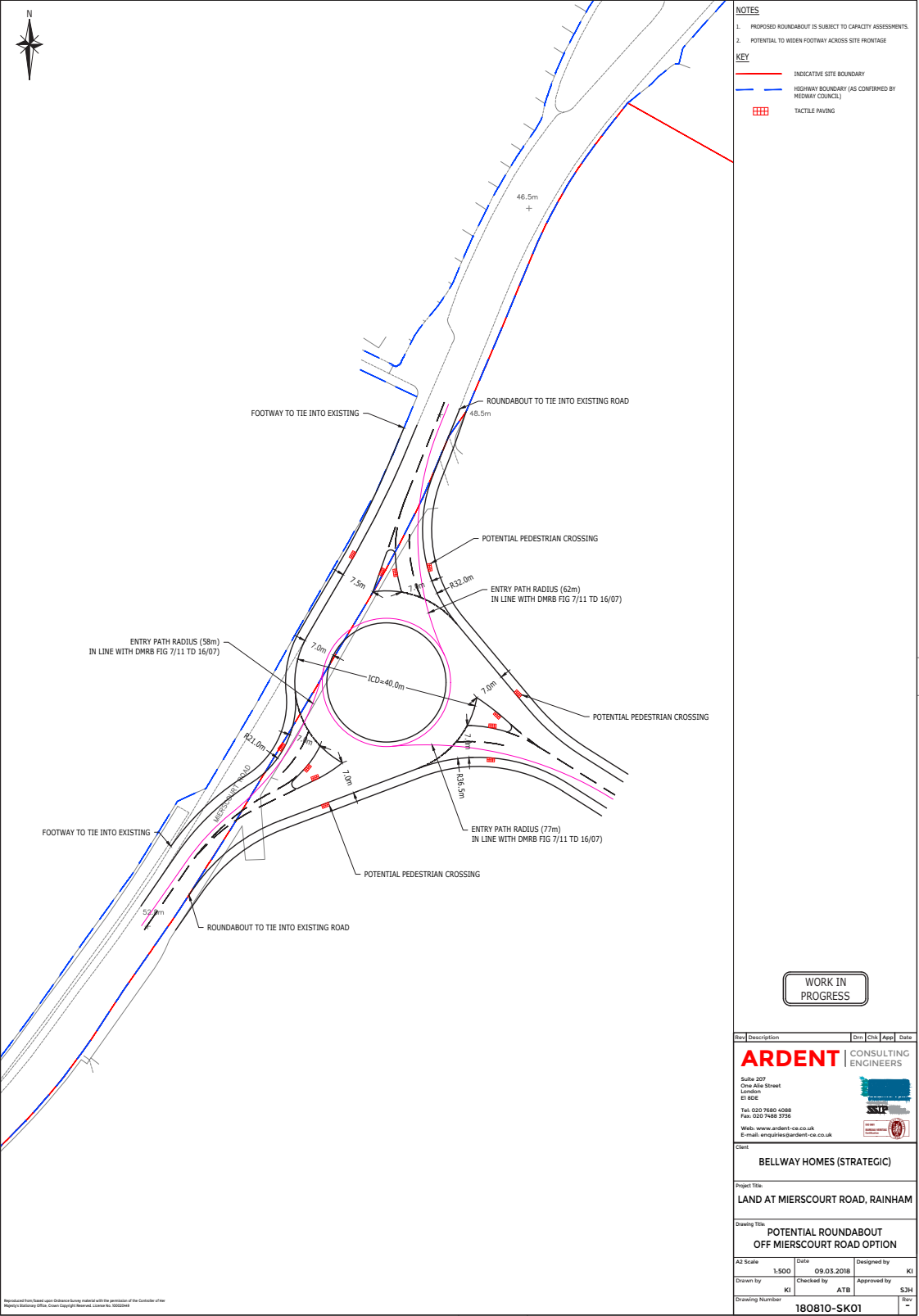
The scale of development would also provide the opportunity to enhance existing means of access by non-car modes including walking, cycling and public transport, including new local facilities on site and the potential for existing/new bus services to travel through the development.



Key Plan

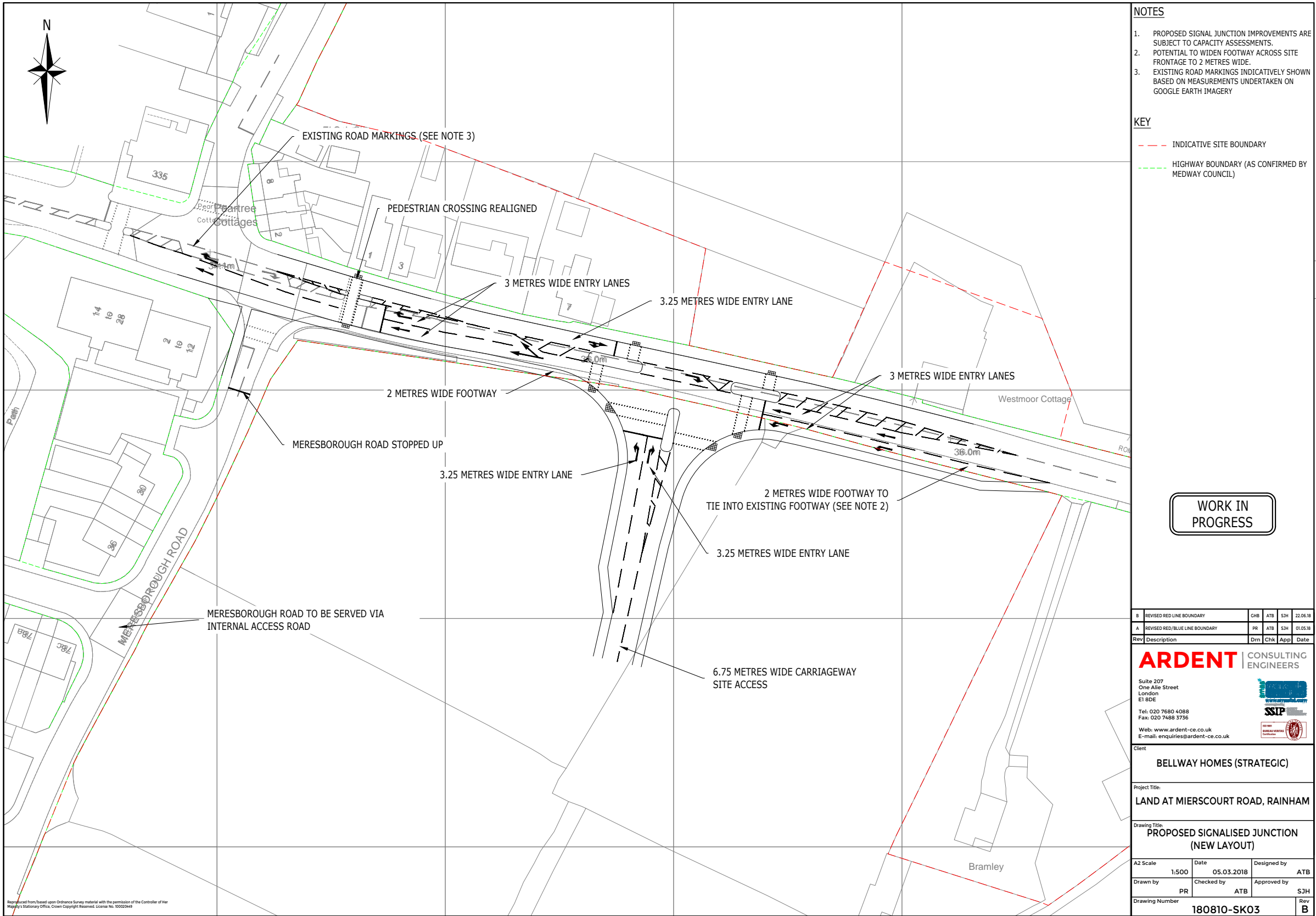


(A1) Potential ghost island at Mierscourt Road

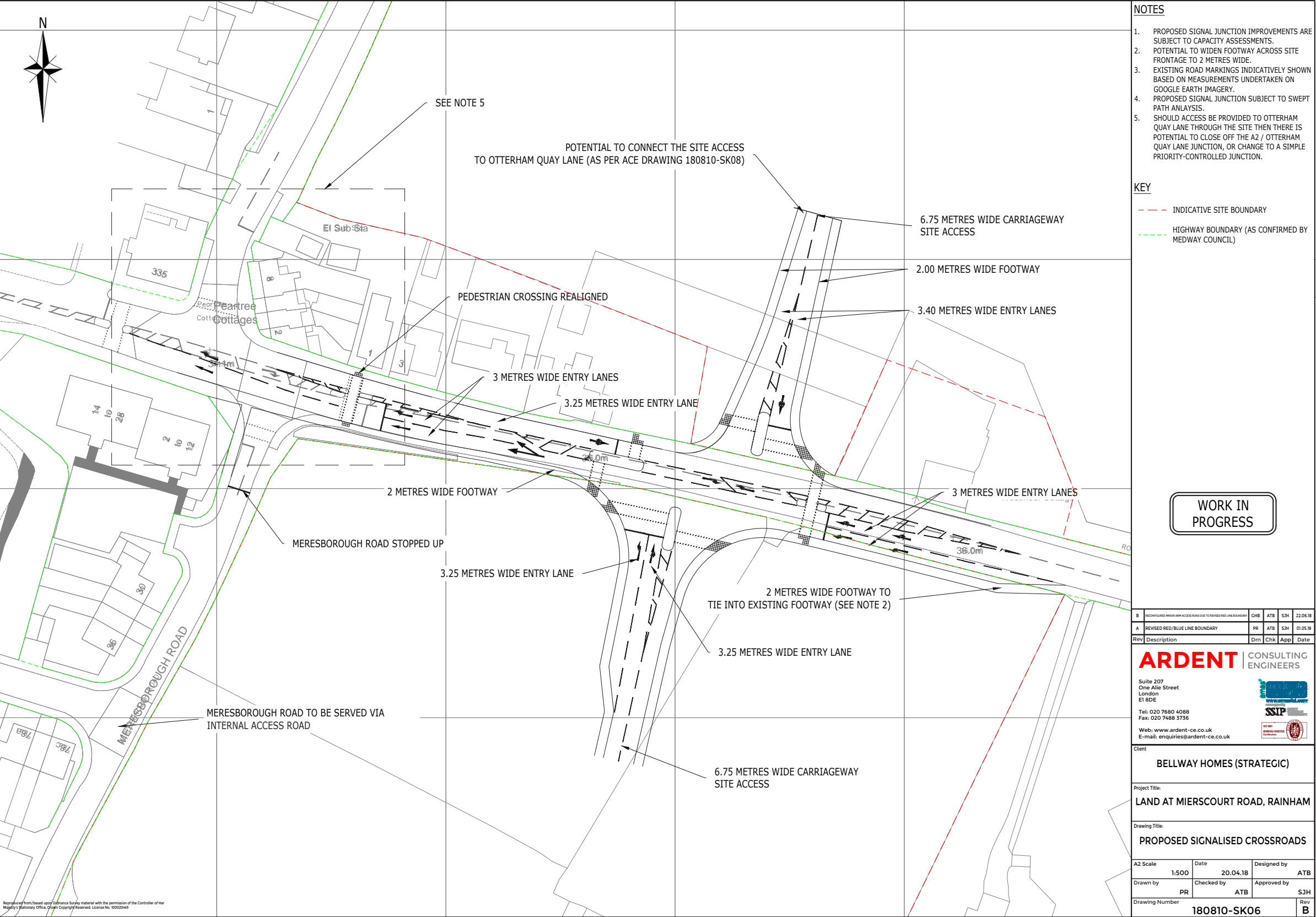


(A2) Potential roundabout off Mierscourt Road

Transportation and highways issues



(B1) Proposed signalised crossroads along Moor Street (A2)



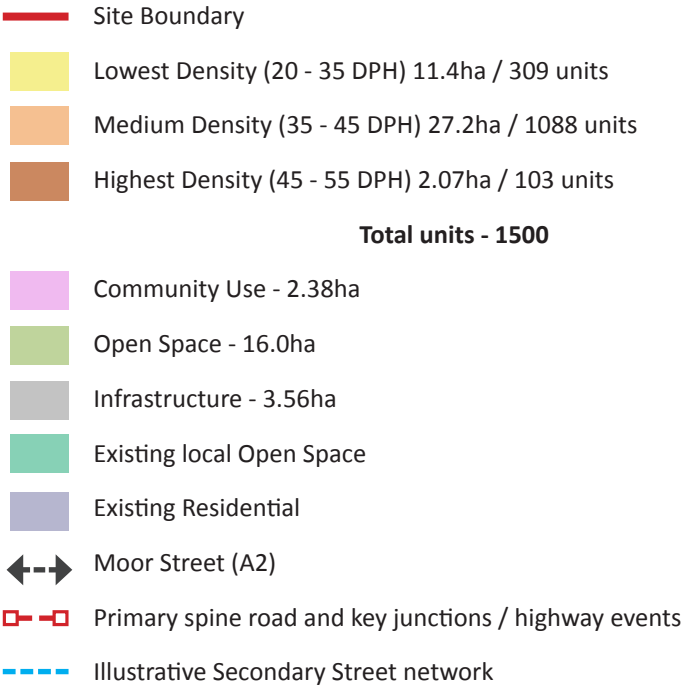
(B2) Proposed signalised crossroads along Moor Street including access to northern parcel (A2)

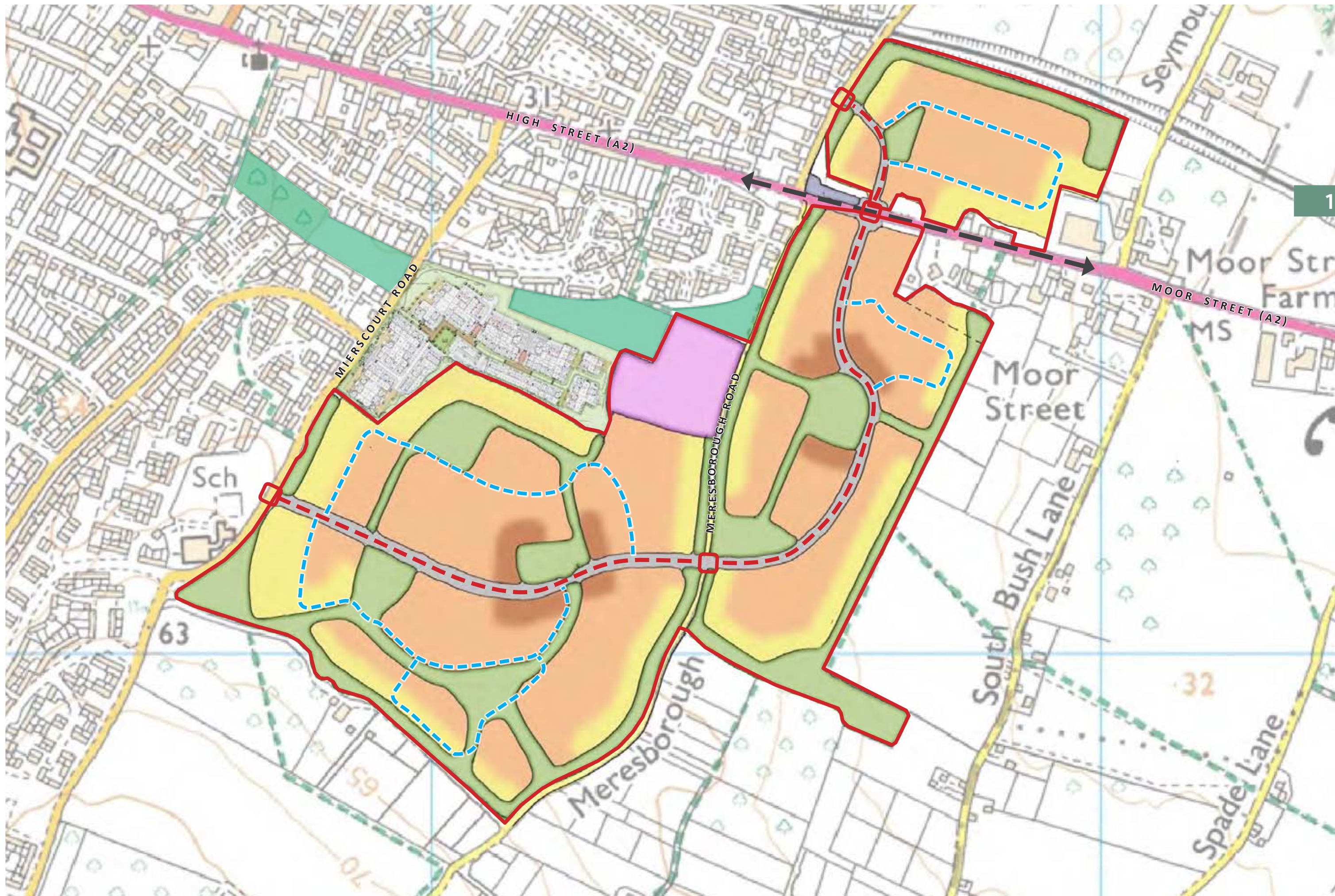
Capacity Study

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An appraisal of the illustrative concept masterplan has been undertaken to assess the number of new homes which could be generated. This suggests that the proposed development area could have the capacity to deliver 1500 new homes together with a range of landscaped open spaces, greenways and play spaces and provision for a new community facility. The capacity appraisal has been based on a range of density comprising lowest density around the development edges within a band of 20 – 35 dwellings per hectare, medium density areas covering the bulk of the development area within a range of 35 – 45DPH and highest density around internal spatial nodes along the central spine road of 45 – 55DPH.

Provision of open space has been based on an average occupancy of 2.4 people per dwelling and an overall provision of 2.4Ha / 1000 population.





Landscape Framework

The landscape framework plan shows a series of public open space areas as parks within the development. These will incorporate formal childrens play provision comprising a range of LAPs, LEAPs and a NEAP to ensure that children have easy access to these within the required distances from their homes.

A network of greenways could be integrated into the landscape framework providing safe pedestrian and cyclist linkages through the new neighbourhood.

Landscaped buffers have been provided along the frontages to Mierscourt and Meresborough Road to enable a semi-rural character to be retained along these development frontages, and along the outer edges of the development area to soften the interface with the wider countryside.

- Site Boundary
- Residential Block
- Community Use (potentially incorporating sports facility)
- Public Parks - 7.21ha
- Green corridors - 1.74ha
- Landscape buffers 7.0ha
- Infrastructure
- Existing local Open Space



In just under 70 years, Bellway has grown from a small, family-owned firm to being one of the top 5 largest housebuilders in the UK

In just under 70 years, Bellway has grown from a small, family-owned firm to being one of the top 5 largest housebuilders in the UK. We have dedicated workforce of over 2,000 people and built and sold 6,851 homes last year.

Bellway's intention for this site are to demonstrate that the site does not meet the purposes of its current designation of Green Belt and that the site should be removed from the Green Belt. The site is a suitable, available and viable site for housing and therefore should be allocated for housing in the forthcoming Local Plan. Once this is established Bellway would submit a planning application and delivery would commence shortly after permission is granted.

The project would be run from Bellway's Kent Division. The Division is located in King's Hill, West Malling and has over 75 full time staff and covers Kent and Sussex.

The Division's pipeline of current developments is as follows:

- 152 houses and flats, Peter's Village, Wouldham
- 110 houses, Folkestone
- 120 houses, Stone Cross
- 73 houses, Signature, Kings Hill
- 86 houses and flats at Hermitage Lane, Maidstone
- 186 houses and flats at Imperial Park, Maidstone
- 250 houses and flats, south east Maidstone
- 156 houses and flats, Gravesend



Track Record

Bellway has a good track record of securing favourable allocations of land for residential development through the planning process and have also developed in Hoo and the Medway towns in recent years.

Maidstone

Promoted 3 sites and now allocated in the emerging Local Plan for 120, 190 and 440 new homes respectively.



(OSP Architecture)

The examples below are of current sites that Bellway are promoting or have promoted through the Local Plan process and have the closest similarities with Brompton Farm:

Hinxhill, Ashford

Planning application for approximately 207 houses was submitted last year.



(BDB Design)

Track Record

24

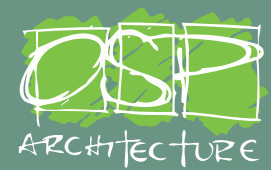
Billingshurst

Local Plan allocation and outline permission granted for 490 new homes, a primary school and other facilities in conjunction with two other developers.



(David Lock Associates)

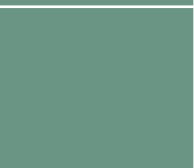




OSP Architecture
Broadmede House
Farnham Business Park
Weydon Lane
Farnham
Surrey
GU9 8QT



www.osparchitecture.com



25 June 2018

FAO: Catherine Smith
 Planning Policy
 Regeneration, Culture, Environment & Transformation
 Medway Council
 Gun Wharf
 Dock Road
 Chatham
 ME4 4TR

67–69 George Street
 London, W1U 8LT

By Email

By email: futuremedway@medway.gov.uk

Our reference: I-hjd-reg18 rep-120618

Dear Madam

MEDWAY LOCAL PLAN 2035 DEVELOPMENT STRATEGY REG 18 DOCUMENT MEDWAY 2035 CONSULTATION DOCUMENT

We are instructed by the University of Kent (the University) to submit representations to both the Medway Local Plan 2012-2035 Development Strategy Regulation 18 consultation document (hereafter referred to as the 'draft Local Plan') and the Medway 2035 consultation document.

Previously, we have submitted representations to the Medway Local Plan consultations in February 2016 and April 2017 and we also attended the Council's Education Workshop held in February 2017. This letter of representation should be read in conjunction with our earlier representations and the comments made in the Workshop.

Context

Founded in 1965, the University has Campuses in Medway and Canterbury and study centres in four European capitals. The Medway Campus was established in 2005 as part of a unique partnership between the University of Kent, the University of Greenwich and Canterbury Christ Church University, collectively known as the 'Universities at Medway'¹. The partnership allows each of the institutions to offer a range of their own courses but to share important Campus and teaching facilities, providing students with a state of the art teaching and student experience.

The 'University Plan 2015-2020' sets out the vision and strategic objectives for the University. It provides ambitious but quantifiable targets against which the University and others can judge its progress. In respect of the Medway Campus, the aspiration is to increase the student population by a further 1,000 FTE students. The University is reviewing its strategy but is clear that it wants to work even more closely in partnership with Medway Council in the future in order to support the growth of the University and provide the best higher education experience in the Country.

The Medway Campus has experienced significant growth since its inception, with the total number of students at the Universities at Medway more than doubling and the total number of staff almost tripling. There has also been significant investment in purpose-built facilities, which represents a significant investment in the Pembroke/Pier Road and Chatham Historic Dockyard area. This amounts to almost £32million on the Pembroke site, including £12.5million for the Drill Hall Library, Pilkington and Rochester buildings and more than

¹ However, the University of Kent began delivering degree programmes from Bridge Wardens' College, Chatham Historic Dockyard, in 1997.

£19million in new academic buildings, and approaching £14million in the refurbishment of buildings within the Chatham Historic Dockyard. This latter investment also included establishing new Music and Arts programmes (Clock Tower Building, Central Boiler House, Engineers Workshop, Fire Station, Foundry, Galvanising Shop, Smithery and the Old Surgery), Kent Business School (Sail & Colour Loft building), a 300+ seat lecture theatre (Royal Dockyard Church), and a performance space and café (Galvanising Workshop) in the Chatham Historic Dockyard.

Alongside infrastructure investment, the University is also expanding its activities. A new Centre for Higher and Degree Apprenticeships is working with employers to develop new programmes to support higher level business needs. The University is now home to KMTV, a unique partnership between the KM Media Group and the University to deliver a local TV service to Medway and mid Kent, with ambitions to cover the whole country. The University is also developing a new Institute for the Creative and Cultural Industries with a particular focus on encouraging economic activity for Medway in the creative sector, to help achieve Medway's strategic transformation as a Creative City. We wish to build on the partnership developed between the University, the Council and Chatham Historic Dockyard Trust that pitched (unfortunately unsuccessfully) for Medway to be a Channel 4 Creative hub.

Representations

1. Medway Local Plan 2012-2035 Development

We have reviewed the draft Local Plan and support the proposed spatial development strategy (Policy DS2) in so far as it focuses growth initially to brownfield sites and areas of regeneration that will include the University "Learning Quarter" at Chatham Maritime. This is considered to be the most sustainable approach to managing Medway's growth but will also aid in the continued development of this area, which is important to the University.

For the University to continue to attract students in an increasingly competitive national and international environment, it is important for there to be a good choice and variety of local housing, public transport and pedestrian links and connections into the wider business community. We consider Medway would also benefit from a wider range of social, cultural and environmental offerings. This is important to the University achieving its strategic aim to increase the number of students at the Medway campus by 1000 full-time equivalents and develop further postgraduate opportunities². We also consider it would assist the prospect for the retention of students post-qualification, which is important to Medway capitalising on the full potential of the University, which is recognised at paragraph 2.43 '*A place that works well*' of the draft Local Plan.

We set out our representations below:

1. Paragraph 2.21: Medway's Cultural Strategy

This paragraph of the Plan sets out four strategic priorities:

- Stewardship – preserve, interpret and enhance Medway's heritage, green spaces and public realm for the enjoyment and benefit of current and future generations
- Engagement – increase active engagement and satisfaction with cultural activities to improve quality of life, providing the essential place-making for the significant regeneration that is taking place in Medway
- Prosperity – harness and foster the creative talent within Medway and maximise the opportunities the universities and further education, tourism, creative sector and cultural offer create for Medway's economy.
- Wellbeing – increase active participation to address obesity, mental and spiritual health, promoting active minds, bodies and lifestyles and seeking to address social isolation.

The University supports these four strategic priorities as they closely reflect the University's view of Medway. Successful implementation of the Medway Cultural Strategy would assist the continued success of the University and build on the University's investment in Medway, such as with the 2018

² University Plan 2015-2020, University of Kent

launch of the Centre for Music and Audio Technology on the Medway Campus and our planned Institute for the Creative and Cultural Industries.

We consider these four strategic priorities should be referenced elsewhere in the Local Plan to emphasise their importance. We highlight possible opportunities to do this further below in this representation, but consider the Council should also review and identify other opportunities in the next Regulation 19 version of the Local Plan.

2. Policy H5: Student Development

Paragraphs 47 and 50 of the National Planning Policy Framework (NPPF) states that local plans should ensure they meet the area's objectively assessed need and that this should include the needs of different groups in the community. Planning Practice Guidance (PPG) makes clear that student accommodation should count towards the Council's housing target. Proposed changes to the NPPF (March 2018) seek to bring the NPPF in line with PPG by clearly stating this should include student housing. Therefore, to be consistent with the NPPF and PPG, the Local Plan should ensure sufficient student housing is provided.

Approximately 14% of undergraduate students and 17% of postgraduate students were located within the ME1 to ME20 postcode areas at the point of commencing their studies in 2017 (rising to 62% and 40% respectively during term-time). The University and its partner Liberty Living also provide 1,100 beds at Liberty Quays, which are considered sufficient for its short to medium term needs, but places importance on the need to ensure good transport links with the University and the wider Medway area.

We support the express recognition given at Policy H5 to locations for student housing being served by public transport and accessible to a wide range of town centre, leisure and community uses. The University considers there is scope to work with Medway Council to improve these transport links and support the University Travel Plan (see also our representations to Policy T1 below).

3. Policy E1: Economic Development

We support the Council's approach set out by this Policy (Question E1). However, we question sole use of GVA for the assessment of applications for employment development (Question E3). Whilst the University directly employs staff that will generate a significant income annually in GVA, there will also be knock-on effects of spending by staff, suppliers and students that could increase the economic impact of the University. Also, some of the University's activities might add a cultural or other benefit in addition to GVA and we consider Policy E1 should allow for these matters to be considered in assessing planning applications.

4. Policy BE1: Promoting High Quality Design and Policy BE2: Sustainable Design

The University supports the need for high quality and sustainable design and for development to demonstrate "sustainability criteria". The draft Policy refers to BREEAM standards and the requirement to achieve a standard of 'Very Good' for energy use and water efficiency, which is also supported. However we consider that the policy should also make clear that these standards should be subject to consideration of technical feasibility and financial viability to allow flexibility when assessing schemes that have particular design requirements, such as laboratories, or affect historic buildings, which might make it difficult to apply BREEAM.

5. Policy I3: Education

We consider the Council's proposed Policy I3 on education to be sound, insofar as it relates to further and higher education development.

There is scope in this Policy to refer to the Council's Cultural Strategy (see comments at 1. above), which we consider would support implementation of both the University Plan and the Council's strategic priorities.

We suggest a sentence be added to the end of paragraph 10.11 consistent with our representation at 1. above, to highlight the importance of the Cultural Strategy. Possible wording could be as follows:

“Opportunities are presented to identify measures arising from the Council’s Cultural Strategy to support the universities and the development of Chatham Maritime.”

6. Policy T1: Promoting Sustainable Transport

This policy is supported in principle, but we consider a specific criterion should be added to refer to the importance of improving access to Chatham Maritime and working with the University of Kent to support implementation of the University Travel Plan. This request also relates to our representation to Policy H5 (see 2. above), which acknowledges the importance of linking public transport to student housing.

Measures the University has raised in previous representations that we would like the Council’s particular support on include:

- Creation of a cycleway across Medway from Strood to Chatham Maritime
- Direct bus links between the University Campus and nearby train stations, Chatham Waterfront and Strood
- Expansion of late night bus services

We request the above transport improvements are incorporated into the Local Plan and the Transport Local Plan.

7. Policy T10: Vehicle Parking

The University supports the requirement for an appropriate level of parking provision to be provided within development proposals. However, the draft Policy T10 refers to development proposals being determined in accordance with adopted standards and we do not consider there is sufficient flexibility for particular circumstances to be taken into account when determining planning applications. The need for flexibility is acknowledged at Paragraph 11.58 in the supporting text, but is not translated into the policy itself.

For the proposed policy to be sound, we therefore consider it should be amended as follows (additions underlined):

“Planning applications for residential and non-residential development will be determined in accordance with the adopted Parking Standards, subject to consideration of site specific circumstances or material considerations that indicate otherwise”.

This is consistent with national policy and is justified. NPPF paragraph 39 states that Councils should consider a range of factors when setting parking standards, and government guidance that states that local parking standards should only be imposed where there is clear and compelling justification that the local network should be managed. The amendment will enable the consideration of site specific circumstances or alternatives (where appropriate) and is therefore justified.

2. Medway 2035

Medway 2035 is a strategic ‘vision’ or ‘blueprint’ for Medway and is described as an evidence document to inform the Local Plan. The document sets out a range of objectives and priorities for delivering the growth anticipated by the draft Local Plan and is effectively a high-level implementation framework to inform more specific measures and delivery mechanisms in the future.

We consider Medway 2035 to be an important document for the University, as it sets out the main priorities to deliver the regeneration proposed by policies in the Local Plan. Given this, we are unclear why the document is identified in the evidence base and we are concerned this approach is not consistent with the NPPF. Paragraph 158 onwards of the NPPF sets out the type of evidence that is required and whilst it is not prescriptive, it requires evidence to be focused tightly on supporting and justifying particular policies in the Local Plan. In our opinion Medway 2035 does not provide evidence to support policies in the Local Plan, but sets out priorities for implementation of the Local Plan.

Whilst the University supports the principle of Medway 2035, we consider there is an opportunity to include references to implementation of the Medway Cultural Strategy and transport strategy, consistent with our representations set out above, as the objectives and priorities are too heavily weighted on employment criteria (i.e. innovation, business growth, and employability).

For Medway 2035 to be found “sound” we request:

Specific reference to Local Plan Policy I3: Education at page 50 ‘Higher and Further Education’ to provide a link to the Local Plan

Either the addition of a new ‘Cultural Priority’ to provide a framework for implementation through Medway 2015 of the Council’s priorities set out at paragraph 2.21 of the draft Local Plan, or the inclusion of specific reference to the Cultural Strategy elsewhere, such as at Priority 1 ‘Destination and Placemaking’

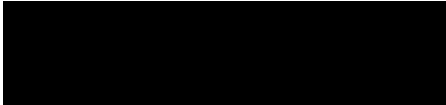
As Medway 2035 will inform more specific measures and delivery mechanisms in the future, it is imperative that these matters are addressed in this strategic ‘vision’ or ‘blueprint’ document to set the correct path for clear and definitive detail to come forward as part of the subsequent Local Plan stages and through specific delivery plans. This is also consistent with NPPF core principles and achieving the three dimensions of sustainable development, comprising economic, environmental and social roles.

Conclusions

The University welcomes the recognition given in the draft Local Plan and Medway 2035 to the University and the importance of higher education to Medway. We would welcome the opportunity for further discussion and engagement with the Council to discuss the issues raised in this letter to ensure that the Local Plan and Medway 2035 capitalise on the full potential of the University.

Please would you acknowledge receipt of this letter of representation. We reserve the right to supplement this letter at a later date.

Yours faithfully



Emma Andrews

For and on behalf of Porta Planning LLP

June 22 2018

Our Reference
NeuConnect MC Reps

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

Dear Sirs

Medway Council Local Plan Development Strategy Representation

The comments contained in this local plan representation relate to the Isle of Grain where NeuConnect Britain Ltd is considering investing into the area. It is acknowledged the Isle of Grain is subject to a number of environmental restrictions including a Ramsar site; Site of Special Scientific Interest; and Special Protection Area. The area of land in question sits outside of these environmental designations.

The format of this local plan representation follows the sections contained within the Medway Council Local Plan Development Strategy document. Where relevant a response has been provided to the questions posed within the consultation document.

Section 4: Housing

Policy H1: Housing Delivery

Draft Policy H1 sets out 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”; and that “Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period”.*

The village of Grain provides a supporting role to employment and energy uses in the Isle of Grain area. It is understood that plans to expand the village are in a seaward direction, on the east side of the existing settlement. Potential site allocation reference 0833 is identified on the Plan associated with Scenario 3 – Meeting Government’s Proposed Calculation of housing need. We do not wish to pass any specific comments on these proposals.

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

In response to Question H1, we support proposals to expand the village of Grain in a seaward direction. Land to the west and southwest of the village should be protected for employment and energy infrastructure. It is considered that any residential development proposed around the perimeter of Grain has the potential to prejudice the strategic importance of the area for employment and energy.

Section 5: Employment

Policy E1: Economic Development

Draft Policy E1 sets out that *“The council will seek to boost Medway’s economic performance, securing a range of jobs for its workforce”; and “This will involve the safeguarding of sites, identification of redevelopment and investment opportunities, and allocations for new sites”*. In addition the policy looks to measure economic productivity of schemes coming forward through GVA.

The Isle of Grain is considered strategically important for employment land in Medway. Paragraph 5.3 of the emerging Development Plan acknowledges that *“ports, wharves and energy infrastructure have built up around the river estuary”*. There is a development strategy that could see additional employment land allocated around these existing facilities. Figure 5.1 – Potential Employment Land Allocations provides a diagrammatic representation for expansion and/or intensification of the existing employment area on the Isle of Grain. It is anticipated this will potentially develop into site allocations for the area during the plan preparation period.

Question E1: Do you consider that this is an effective approach to securing and strengthening Medway’s economy?

In response to question E1, we support the general approach to securing and strengthening Medway’s economy.

Question E2: Which locations do you consider are the most appropriate for employment growth?

We support proposals for expanding and/or intensifying existing employment areas on the Isle of Grain. However, any future employment land allocations should not prejudice the ability for expansion of the energy industry in this area. We therefore propose inserting the following supporting text as a new paragraph following paragraph 5.23 to accompany policy E1: Economic Development:

“The Council recognises the continuing importance of employment land in the Isle of Grain area and will seek to identify new site allocations for employment purposes where these complement and enhance existing employment uses and energy infrastructure”

Question E3: Do you agree with the proposed approach to assessing GVA with planning applications for employment uses?

With regards to assessing GVA on development proposals, it is important to acknowledge that further support of the energy sector will also have the ability to strengthen Medway’s economy and policy E1 should be updated to reflect this.

Section 12: Minerals, Waste and Energy

Waste Management

Policy MWE8: Existing Waste Management Facilities

Policy MWE9: Waste Disposal to Land

Draft Policy MWE8 seeks to safeguard *“existing waste management facilities that currently benefit from permanent planning permission... from development for non-waste management uses”*. This policy then sets a number of criteria whereby alternative development would be permitted.

Paragraph 12.26 of the emerging development plan acknowledges Medway Council are not looking to allocate sites for new landfill or land-raising facilities. This paragraph then goes on to reference appropriate criteria for determining proposals that may come forward in this area. Draft Policy MWE9: Waste disposal to land, is the policy where these criteria have been set out; and this is the policy against which proposals for future landfill or land-raising facilities would be assessed.

The ‘Disposal to Land Resource Area’s’ plan associated with draft Policy MWE9 identifies those areas on the Hoo Peninsula and Isle of Grain considered well suited for landfilling of waste. It is understood this designation was determined using geological information which identified areas of clay suitable to receive non-inert or hazardous waste. The designations also include buffers applied around existing settlements in the area.

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?

Draft policy MWE8 provides adequate flexibility for the re-use of existing waste management facilities for non-waste uses under the policy criteria.

The combination of draft policy MWE9 and identification of suitable land on the associated 'Disposal to Land Resource Area's' plan amounts to a site specific land use allocation. The allocation of land for landfill is not considered appropriate or in line with Government Policy. The implication of this area being identified as suitable for new landfill or land-raising facilities has the potential to prejudice future employment uses and energy infrastructure on the Isle of Grain. We request the Disposal to Land Resource Areas designation on the Isle of Grain is removed from this plan.

In addition, there is an existing permitted waste site within the Isle of Grain which benefits from an active Environment Agency Authorised Landfill Site permit. It is understood that this landfill has now closed and the only associated activity taking place is ongoing management and monitoring. It is not possible for the site to accept any further waste material because it has since been capped and is now used for agriculture purposes. It is therefore considered unlikely that future waste disposal to land sites will come forward in this area.

Energy and Renewables

Policy MWE11: Energy and Renewables

Within the emerging Development Plan, energy production in Medway is considered a strategic priority. Paragraph 12.30 of the consultation document acknowledges that "*Medway is of national significance for power generation, electricity and aviation fuel distribution and Liquefied Natural Gas (LNG) importation*". Grain power station and a two-way electrical inter-connector (linking the UK to the Netherlands) are located on the Isle of Grain. These both contribute significantly towards energy production in Medway.

Draft Policy MWE11: Energy and Renewables sets out that new energy development would be supported, subject to a number of criteria. The emerging development plan document does not propose any land use allocations for energy development. Future proposals would therefore be determined in accordance with criteria set out in emerging policy MWE11 alongside other policy considerations, which may include alternative land use allocations.

Question MWE3: Do the proposed policies MWE11- MWE12 represent the most sustainable approach to planning for energy in Medway?

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

Given the existing strategic importance of the Isle of Grain, we would consider this an appropriate location for additional energy infrastructure. We wish to ensure that any future forthcoming proposals for energy infrastructure in this area are not prejudiced by other potential land use designations. We suggest the local authority to put more emphasis on the role played by the Isle of Grain in energy development within the emerging development plan. We therefore propose inserting the following text in support of policy MWE11: Energy and Renewables:

"The Council recognises the continuing strategic importance of the Isle of Grain area as a centre of energy infrastructure and will encourage new energy developments coming forward in that area"

Draft policy MWE11 is supportive of new energy developments and its criteria for testing development proposals are not considered onerously restrictive to future development. We are of the opinion that if this area is to continue its position in the forefront contributing towards the national energy supply the local authority should give consideration to the allocation of sites for energy infrastructure. We therefore suggest inserting the following text into policy MWE11: Energy and Renewables:

"The Council will actively seek to identify new site allocations for energy development in the Isle of Grain area"

In the event the local authority wishes to discuss site specific allocations for energy development further, we would be willing to engage.

Yours sincerely,

Louise Crook
Associate Director
AECOM Ltd.



From: [REDACTED]
Sent: 25 June 2018 13:42
To: futuremedway
Subject: Future Medway Local Plan 2012 to 2035 - Representations of Chatham LLP and Bridges LLP
Attachments: Medway Local Plan Representations of Ellandi Bridges 250618.pdf
Categories: Blue Category

Dear Sirs,

Please find attached the final representations of Ellandi and Bridges in relation to the emerging Medway Local Plan. Chatham LLP and Ellandi LLP are the owners of the Pentagon Shopping Centre in Chatham.

These representations contain detailed analysis of the underpinning retail evidence and we would ask that they are reviewed in full.

To summaries, the key findings of the review are as follows:

- The plan needs to recognise the progress being made in relation to the emerging Chatham Town Centre Masterplan and ensure that the policies within it actively support the aims, objectives and requirements of this important document.
- There are a number of problems with the retail capacity analysis contained in the GVA North Kent Retail Study which mean that the quantitative need for additional comparison floorspace is significantly overstated in the report. With the errors corrected, it is clear that just 7,500 sqm of new comparison goods floorspace is required (before allowing for recent approvals) up to 2028.
- There are a number of recommendations within the GVA report that are not adequately reflected in the emerging plan policies, including, but not limited to the use of a comparison floorspace requirement that does not allow for existing commitments, nor does it use the 2028 capacity figures as suggested.
- There is insufficient consideration of qualitative need in the retail capacity analysis and the risk posed to the town centre as a result.
- There is a need to review the retail and town centre policy references to Hempstead Valley to make it clear that, as a lower order centre in the retail hierarchy, any development within it should be subject to both sequential and impact assessments. This is necessary given the fragility of Chatham Town Centre and its importance in ensuring the success of the overall Medway Vision.
- For similar reasons, there is a need to include an impact floorspace threshold below the default value of 2,500 sqm set out in the NPPF and to consider how the test should apply to A3/A4/A5 uses.
- The proposed policies in relation to changes of use within the defined Primary Frontages need to be reviewed to ensure they are not too onerous. They should not prevent or delay complementary non-retail uses from occupying vacant units in the town centre nor make it more difficult for the Town Centre to compete with out-of-centre or lower order centres in attracting new occupiers.
- The retail hierarchy should not include Chatham Dockside, nor should it provide any protection to out-of-centre retail parks.

I would be grateful if confirmation of receipt could be confirmed by return to this email.

Yours faithfully

Matthew

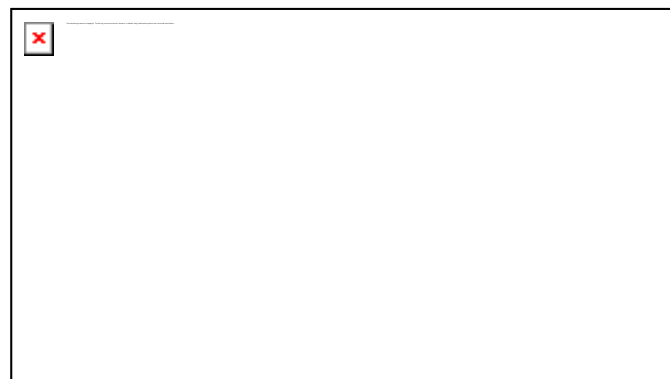
Matthew Williams (MRTPI AIEMA)

Director

Portman House

[5-7 Temple Row West](#)

[Birmingham | B2 5NY](#)



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25 June 2018

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

**WILLIAMS.
GALLAGHER.**

Williams Gallagher
Portman House
5-7 Temple Row West
Birmingham
B2 5NY
williams-gallagher.com

Sent by Email

Dear Sir / Madam

**Future Medway Local Plan 2012 to 2035 Consultation
Development Strategy Technical Document
Representations on behalf of Chatham LLP and Ellandi LLP**

Williams Gallagher Town Planning Solutions Ltd (Williams Gallagher) act on behalf of Chatham LLP and Ellandi LLP who respectively own and asset manage the Pentagon Shopping Centre in Chatham Town Centre.

This letter is submitted to provide observations in connection with the Medway Council Local Plan 2035 Development Strategy Consultation. It follows representations submitted by Savills¹ on Ellandi's behalf in connection with the Local Plan Issues and Options Consultation in February 2016 and the Development Options Consultation in April 2017 (both representations enclosed with this letter for ease of reference).

It should be noted that since these representations were submitted, significant work has been undertaken by Chatham LLP and its partners to investigate options for investment in the Centre and it has begun working with Medway Council in respect of the Chatham Town Centre Masterplan which is currently being prepared by Gillespies. The Masterplan is seeking to substantially enhance the mix of uses and scale of development within the town centre and will include significant redevelopment opportunities around the Pentagon Shopping Centre. Further details will become available as the Masterplan develops in advance of the local plan examination.

Chatham LLP and Ellandi LLP have also submitted a series of objections to developments outwith Chatham Town Centre which will have significant implications for its future role as the Borough's main town centre (both in terms of their impact on existing trade and future investment). This includes:

- an objection to the proposal by Location 3 Properties at the Medway City Estate – this application was refused by Medway Council in August 2017 (Application Ref: MC/16/1084) and has since been appealed – an Appeal statement setting out our continued objection to the proposal was submitted to the Planning Inspectorate on behalf of Chatham LLP / Ellandi LLP on 15 May 2018 (Appeal Ref: APP/A2280/W/18/3196850);
- an objection to the Section 73 application by the owners of Chatham Dockside to remove Conditions 21, 22, and 23 of Planning Permission Ref: 97/0224/GL (outline application for the redevelopment of land and buildings including 3 No Listed Buildings for leisure, business, retail and food and drink uses) (Application Ref: MC/18/0600) – this application is still in the process of being determined by officers at the time of writing;

¹ Williams Gallagher was formed in January 2017 by Matthew Williams and Heather Gallagher who previously advised Ellandi LLP through Savills (UK) Ltd (Savills).

- an objection to the proposal for a retail and leisure development at Hempstead Valley Shopping Centre (HVSC) (Application Ref: MC/17/3484) – this application was approved April 2018; and
- an objection to the proposal by Royal London UK Real Estate Fund for the construction of a drive-thru restaurant (Class A3/A5) and foodstore and the refurbishment of an existing retail unit at the Horsted Retail Park, Chatham (Application Ref: MC/17/4259) – again, this application was approved in April 2018.

It is within the abovementioned context that these representations are made.

Our specific comments in respect of each Section / draft Policy are set out below and respond to the specific questions posed within the consultation document (where these are posed) for ease of reference. However, in summary, whilst we agree with many of the key challenges and opportunities identified for the Borough and consider that the Vision for 2035 Medway is appropriate in terms of its recognition that the regeneration of Chatham Town Centre is central to the success of Medway's development in the future, the town centre and retail policies need to be reviewed, to ensure that they provide sufficient support for Chatham Town Centre and are based on a robust evidence base.

Specifically:

- The plan needs to recognise the progress being made in relation to the emerging Chatham Town Centre Masterplan and ensure that the policies within it actively support the aims, objectives and requirements of this important document.
- There are a number of problems with the retail capacity analysis contained in the GVA North Kent Retail Study which mean that the quantitative need for additional comparison floorspace is significantly overstated in the report. With the errors corrected, it is clear that just 7,500 sqm of new comparison goods floorspace is required (before allowing for recent approvals) up to 2028.
- There are a number of recommendations within the GVA report that are not adequately reflected in the emerging plan policies, including, but not limited to the use of a comparison floorspace requirement that does not allow for existing commitments, nor does it use the 2028 capacity figures as suggested.
- There is insufficient consideration of qualitative need in the retail capacity analysis and the risk posed to the town centre as a result.
- There is a need to review the retail and town centre policy references to Hempstead Valley to make it clear that, as a lower order centre in the retail hierarchy, any development within it should be subject to both sequential and impact assessments. This is necessary given the fragility of Chatham Town Centre and its importance in ensuring the success of the overall Medway Vision.
- For similar reasons, there is a need to include an impact floorspace threshold below the default value of 2,500 sqm set out in the NPPF and to consider how the test should apply to A3/A4/A5 uses.
- The proposed policies in relation to changes of use within the defined Primary Frontages need to be reviewed to ensure they are not too onerous. They should not prevent or delay complementary non-retail uses from occupying vacant units in the town centre nor make it more difficult for the Town Centre to compete with out-of-centre or lower order centres in attracting new occupiers.

- The retail hierarchy should not include Chatham Dockside, nor should it provide any protection to out-of-centre retail parks.

Medway Development Strategy Document 2018

In brief, it is understood that this latest consultation represents the third formal round of consultation that will inform the content of the new Local Plan. It begins with setting out a series of key challenges / opportunities for the Borough including but not limited to:

- The fact that Medway does not enjoy either the recognition, or the range of services and facilities that an area of this scale warrants (it is the second largest urban area in the South East after Brighton & Hove, and similar in size to cities such as Plymouth). This may reflect the polycentric pattern of Medway's urban area, with the five main towns each providing their own centre, and key destinations and attractions being spread across Medway, rather than clustered in one city centre.
- The town centres in Medway are not always seen as attractive destinations and vibrant hubs for community activities, and they have suffered from the structural changes in retail patterns which have been seen across the country. In particular Chatham does not provide the scale of retail and leisure facilities that would be expected for a city of its size, and the centre for wider Medway.
- The scale of growth Medway is experiencing is challenging - the population has increased by over 13,500 people in the last 5 years, one of the fastest growing areas in Kent - however, the rate of growth has slowed significantly in the last couple of years.
- Medway is part of the Thames Gateway regeneration programme that seeks to raise economic success and boost the delivery of infrastructure and housing. There is an ambitious agenda for growth, underpinned by nationally significant infrastructure, such as the Lower Thames Crossing. The Government is proposing a route that connects Kent and Essex to the east of Gravesham. The route would sit close to the Medway boundary and is an important consideration in assessing travel patterns and setting the direction of the Local Plan. The development of Ebbsfleet Garden City is underway and proposals for the London entertainment resort on the Swanscombe peninsula are being advanced. Such strategic scale developments could have implications for Medway.
- Bluewater has a sub-regional shopping role and has a major impact on retail patterns across the area, drawing over a quarter of all comparison spend from Medway. The expansion of the leisure offer at Bluewater will have further implications for Medway's town centres.

We note and agree with the challenges identified by the consultation document, albeit with reference to the final bullet, it should be recognised that it is not only Bluewater that serves to impact upon trade patterns / allocated centres in the Borough.

Indeed, in order to be found sound, the Plan and supporting evidence base must acknowledge that there are a series of out of centre facilities (e.g. Horsted Retail Park) and lower order centres (such as Hempstead Valley District Centre) *within* the Borough that compete with Chatham Town Centre on a like for like basis. Referring to Hempstead Valley for example, it is notable that:

- Question 13 of the Household Survey that informs the GVA North Kent Retail Study indicates that the usage of Hempstead Valley District Centre for comparison goods shopping is higher than Chatham Town Centre;
- Moreover, the comparison goods turnovers of Chatham Town Centre and Hempstead Valley are not substantially different - £168.3m v £103m (Table 4.2 of the GVA North Kent Retail Study) – this gap is likely to close further when the recently approved extension at Hempstead Valley is factored in,

It is therefore the case that local facilities such as Hempstead Valley are becoming increasingly dominant and serving to divert trade from Chatham Town Centre. The planned expansion of these Centres and any future expansion of these or other out-of-centre retail provision have the potential to further undermine Chatham's role at the top of the hierarchy of Medway centres. Acknowledging this is essential in order to properly plan for Chatham Town Centre's future.

Vision and Objectives

The document then moves on to setting a Vision for 2035 Medway. The supporting text to this Vision notes that regeneration of Chatham Town Centre is central to the success of Medway's development. Indeed, Para 2.36 states that:

"[Chatham] town centre and adjacent waterfront will be a focus for community life. In line with wider trends seen in retail, the role of the town centre is anticipated to evolve in response to changes in shopping habits, and strengthen as a revitalised hub for community and leisure activities. This will be achieved through investing in quality, extending access, and broadening the offer, particularly in leisure, culture and community activities. Chatham can develop a distinct role in offering city scale facilities, such as arts and music venues that realise some of the key opportunities for Medway's future. It will complement the urban centres across Medway. There is potential to bring more homes into the central area, boosting potential footfall for local services and businesses, and increasing vibrancy. This accords with government ambitions to make the best use of land in accessible locations, with good connections to public transport services. Analysis carried out by the Planning Service has confirmed that central Chatham is a highly accessible location, and that there are opportunities for redevelopment that could strengthen its function. This is identified as an 'opportunity area' in the proposed development strategy presented for consultation".

A series of strategic objectives for the Plan are also identified (Para 2.43 onwards) including:

- ensuring Medway's recognition as a university city and realising economic and place-making opportunities associated with the learning cluster of higher and further education providers in Medway;
- providing for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs;
- strengthening the role of Medway's town, neighbourhood and village centres, securing a range of accessible services and facilities for local communities, and opportunities for homes and jobs, with Chatham providing the focus for new retail and community facilities; and
- securing the ongoing benefits of Medway's regeneration, making the best use of brownfield land, and bringing forward the transformation of the waterfront and town centre sites for quality mixed use development, a focus for cultural activities.

We note and welcome references in the supporting text of the Plan to the importance of Chatham Town Centre as the Borough's main town centre. More should be made of this however within the overall Vision for the Borough set out at Page 19. For example:

"Chatham Town Centre will continue to operate as the Borough's main town centre. It will be a thriving centre at the focus of community life and will have broadened its offer in order to respond to changes in shopping habits to include residential, leisure, cultural and community uses. This offer will complement the Centre's main retail focus".

The text should also reference the emerging town centre masterplan and draw in the headline opportunities from the plan when it is available in advance of the local plan examination.

Overarching Development Strategy

The Plan's overarching Development Strategy is contained at Section 3 of the document.

This considers the scale of development needed to support Medway's growth, and strategies to deliver its ambitions for a leading university waterfront city, noted for its revitalised urban centres and its stunning natural and built environment. It presents alternative approaches to how Medway may achieve the vision and strategic objectives set for sustainable development promoted in the Plan.

Section 3 also explains that four development scenarios are presented for consultation. These largely focus on the distribution of housing land. However, there are common approaches to employment and retail land in the development strategy, and there will be requirements for infrastructure delivery in line with housing allocations.

The current consultation document does not set housing targets for the Borough owing to a revised approach to assessing housing need recently being proposed by National Government through updates to the NPPF (taking the Government's approach would significantly increase the Council's housing need figures). The document instead states that the Council will have regard to the government's response to the consultation, updates to the NPPF, and the publication of 2016 based household projections, to review its evidence base on development needs (including housing), before publishing the draft Local Plan.

We look forward to reviewing the Borough's housing targets as and when they are made available and will support opportunities for meeting these targets within Chatham Town Centre.

Draft Policies

Section 4 of the document onwards sets out a series of draft policies under the following headings:

- Housing
- Employment
- Retail and Town Centres
- Natural Environment and Green Belt
- Built Environment
- Health and Communities
- Infrastructure
- Transport
- Mineral, Waste and Energy

The following draft policies are of particular interest to Chatham LLP / Ellandi LLP (NB this list excludes the draft Retail and Town Centre policies which are addressed below):

- Policy H2: Housing Mix states, inter alia, that residential development will be permitted to encourage a sustainable mix of market housing to include an appropriate range of house types and size to address local requirements. The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.
- Policy H3: Affordable Housing specifies that on housing and mixed-use development sites of 15 or more residential units, the Council will require the delivery of affordable housing. The affordable housing requirement for urban areas (to include Chatham) will be 25% of all residential units for developments of 15 or more dwellings. On-site provision is preferred, although off-site may be considered where this enables other policy objectives to be met and subject to an equivalent level of developer contribution being provided.
- Policy H4: Supported Housing, Nursing Homes & Older Persons Accommodation states that supported housing, nursing homes and older persons accommodation will be supported

where it meets certain criteria. This includes meeting a proven need for the type of development proposed and such development proposals not leading to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area.

- Policy H5: Student Accommodation states, inter alia, that provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need. The Council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, and does not have a negative impact on the core functions of the town centres, and is consistent with strategic redevelopment plans.
- Policy E1: Economic Development states that the Council will seek to boost Medway's economic performance, securing a range of jobs for its workforce. This includes consolidating economic benefits from the regeneration programme in Medway, specifically seeking to strengthen the role of the town centres in providing wider job opportunities.
- Policy E3: Tourism notes that tourism developments that can contribute positively to the regeneration of Medway, consistent with the Council's vision, and extend the cultural offer will be considered favorably. Opportunities for development to enhance the vibrancy and vitality of town centres will also be welcomed.
- Policy E4: Visitor Accommodation promotes the retention and provision of visitor accommodation (e.g. hotels) subject to certain criteria being met. This includes meeting a proven need and contributing to the vibrancy, vitality and viability of town centres and the sustainability of wider settlements.
- Policy T2: Integrating Land Use and Transport Planning promotes development which supports the use of sustainable transport and higher density development mixed use development in areas within close walking distance of the main rail stations (Rochester, Chatham, Gillingham and Strood).

We wish to lend our in-principle support to the abovementioned draft policies, although we reserve the right to make comments on these policies where they are included in future iterations of the draft Plan.

We would however raise that the plan should also include policy on PRS / Build To Rent accommodation as set out in the emerging policy of the revised National Planning Policy framework. It is also recommended that the plan considers opportunities for co-living accommodation. A policy that provides the ability for co-living accommodation to be pursued within a clear framework will ensure that this type of accommodation can add to a sustainable housing mix for Medway.

Retail and Town Centres Policies

Section 6 of the document sets out a series of draft policies dealing with retailing and town centres in Medway. We have a number of observations and concerns in regard to these draft policies (and indeed the supporting text to these policies) which are addressed below.

To begin, we note that Paragraph 6.3 refers to the GVA North Kent Retail Study (2016) (GVA) which is intended to form part of the evidence base for the new Local Plan and has clearly informed the emerging policies.

This paragraph notes that there is a need for an additional 46,100 sqm of comparison goods retail floorspace by 2031 and 70,500 sqm by 2037 (excluding commitments) and a need for 12,300 sqm of convenience retail floorspace by 2031 and 13,200 sqm by 2037 (again, excluding commitments).

This is a significant amount of retail floorspace and it is therefore essential that the source of these figures (the GVA report), is both robust and transparent. For the reasons set out below and in the attached note, we do not consider this to be the case. Therefore, the quantitative need assessment should be reviewed at the earliest opportunity to ensure the identified need for retail floorspace is not overstated. Overstating need for additional retail floorspace across the Plan period risks Medway exposing itself to inappropriate and unsustainable out of centre retail development where this capacity cannot be met in Chatham Town Centre.

Identified Retail Need

As highlighted above, Paragraph 6.3 of the Consultation Document indicates that within Medway there is:

- a need for 46,100 sqm comparison floorspace by 2031 and 70,500 sqm by 2037;
- a need for 12,300 sqm of convenience retail floorspace by 2031 and 13,200 sqm by 2037.

A review of the Retail Study itself by GVA confirms that the above comparison figures assume that existing commitments in the Medway area will not come forward (GVA, Table 8.3), although the convenience figures appear to include commitments (GVA, Table 8.4).

The comparison commitments at the time the GVA study was prepared are listed in the Retail Study at Paragraph 8.13. Given that at least some of this space will come forward, it is not considered that this 'without commitments' figure should be the basis for the Local Plan and indeed to do so is not an accurate reflection of the final recommendations set out at Section 10 of the Retail Study.

The actual quantitative requirement identified by the Retail Study is for 14,300-22,400 sqm net additional comparison goods floorspace by 2025, rising to 61,100-68,100 sqm net by 2037 (GVA, Paragraph 10.24). This is based on the assumption that the commitments for new retail floorspace – which include a site in Chatham Town Centre, and new floorspace in Hempstead Valley – come forward as planned.

The Retail Study then goes on to recommend at Paragraph 10.25 that given the inevitable change in the future passage of time, continued economic uncertainty and expected evolution and change to housing numbers, that instead of planning for the full requirement identified by the Study, the Council should plan for need arising in the period to 2028 under the baseline Experian forecast. This equates to the delivery of around 24,300 sqm net of comparison goods floorspace over the full Plan period (as opposed to 70,500 sqm as specified by the Consultation Document).

This is an important recommendation which does not appear to have been taken on board by the Consultation Document - which is of concern because based on economic modelling alone, the capacity identified by the Retail Study is significant and likely to have severe implications for the vitality and viability of Medway's network of centres where this capacity cannot be accommodated in town centre locations (due to physical and economic constraints). It potentially opens the door for speculative and harmful development in inappropriate locations.

At present, it would appear that the Consultation Document has only taken on board the results of the economic modelling and has continued to disregard the final recommendations of the Retail Study which is to plan for a more realistic figure across the Plan period. Both the NPPF and Practice Guidance clearly state that need is a product of both quantitative and qualitative assessment – accordingly, an element of realism must be applied once quantitative assessment has been undertaken. This needs to account for, inter alia, the health of existing centres, investor sentiment and the extent to which relying quantitatively derived figures in isolation could lead to significant adverse impacts on town centres.

Importantly, the draft revised NPPF which has recently been the subject of public consultation suggests that planning policies should seek to allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking ten years ahead, rather than the full lifetime of the local plan. This is in recognition of the rapid changes to retail needs due to the dynamism of the sector and ongoing disruptive technologies that continue to challenge traditional high street retail models. Local plans should also be reviewed every five years to keep evidence and strategies up to date.

In this case, it is considered that the floorspace identified by the Consultation Document places undue reliance on the results of the economic modelling (without commitments) and results in an excessively high floorspace requirement. It also disregards other important qualitative factors which would point towards the fact that Chatham Town Centre would struggle to deliver such large amounts of comparison goods retail floorspace across the Plan period. This leaves the door open for speculative and harmful development coming forward in inappropriate and unsustainable locations. We would therefore encourage the Council to consider the final recommendations of the Retail Study in more detail and to adopt more realistic capacity figures going forward (having regard to the PPG requirement to ensure that main town centre uses are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise).

Reliability of the Forecast Retail Floorspace Requirements

In addition to the above, it is also important to consider whether the retail need figures prepared by GVA are a robust basis for the Local Plan, which in turn requires a consideration of the assumptions made by GVA in its analysis. We have therefore reviewed the quantitative need assessment prepared by GVA in detail and have identified a number of issues that affect the reliability of the final capacity figures:

- Firstly, we have identified a number of concerns relating to the household survey. These are considered in more detail in the attached Supplementary Review, but in summary lead us to conclude that some of the underlying data that underpins the quantitative analysis is not as robust as it should be. Therefore there is a need to either treat the final outputs with a degree of caution or prepare alternative trading scenarios.
- Secondly, there is a lack of transparency as to how some of the key figures in the Retail Study have been derived. This particularly relates to how GVA have weighted the survey responses to obtain the market shares used in their capacity analysis. Again, this is detailed in the attached Supplementary Review.
- Thirdly, the capacity figures, particularly in the longer term are very reliant on the assumptions made relating to future growth in spend and the amount of business that will be undertaken online. However, these forecasts change on a regular basis and it is therefore important to recognise the effect that such change may have on the overall capacity conclusions. This is examined in further detail below in relation to the key inputs of the GVA analysis, namely sales efficiencies, annual change in comparison expenditure per head and the amount of retail spending that is likely to be undertaken online (included within the Special Forms of Trading (SFT) figures).

Sales Density / Efficiency Assumptions

Paragraph 6.19 of the Retail Study sets out GVA's assumptions in regard to sales efficiencies which represent the ability of retailers to increase their productivity through improvements to sales densities. It goes on to state that Experian does not provide clear guidance on sales densities and as such it makes an assumption as to the improvement to the sales efficiencies of existing and committed floorspace expected in the future, equating to:

- 1.65% per annum for comparison goods; and

- 0.3% per annum for convenience goods.

There are two issues with these assumptions particularly with regard to comparison goods. Firstly, we would query the use of these assumptions, when we consider Experian does in fact provide very clear forecasts for future sales densities under two different sets of assumptions. At the time the GVA report was prepared these were set out in Figures 3, 3a and 3b (assuming constant floorspace) and Figures 4, 4a and 4b (including changes to floorspace) of the 2014 Experian Retail Planning Briefing Note 12.1 (ERPBN 12.1). The latter provide the more appropriate estimates for the current purpose and were as follows:

	2015	2016	2017-21	2022-35	Average Sales Density Growth Rate 2015 – 35
Comparison Density Growth Rate	4.5%	3.2%	2.6%	2.2%	2.6%
Convenience Density Growth Rates	-0.1%	-0.2%	0.1%	0.3%	0.2%

Table 1: Retail Sales Density for Comparison & Convenience Goods including Changes to Floorspace
Source: Tables 4a & 4b (ERPBN 12.1)

This suggests that the GVA assumed efficiencies for convenience goods are slightly too high and thus overstate the ability of existing floorspace to accommodate future expenditure growth. In contrast, and perhaps of more concern, is that the assumed efficiency for comparison floorspace is significantly understated.

Looking at the most recent Experian forecast growth rates as set out in the Experian Retail Planner Briefing Note (ERPBN) 15 (December 2017), comparison sales densities are now expected to be slightly lower but still higher than assumed by GVA:

Comparison Goods	2015	2016	2017	2018	2019	2020-24	2025-36	Average Sales Density Growth Rate 2015 – 35
Density Growth Rate	N/A	4.3%	1.3%	0.9%	1.8%	2.3%	2.2%	2.1%

Table 2: Retail Sales Density for Comparison Goods including Changes to Floorspace
Source: Table 4b (ERPBN 15)

Applying these growth rates to the turnover of existing floorspace (as well as the turnover of new shops) would result in far higher sales densities in the test years which, as can be seen from the attached tables and summarised below, would reduce the overall capacity for new comparison goods retail floorspace by some margin.

In preparing this updated analysis we have also identified an error in the GVA tables 8a and 8b, which use the same sales density for new shops in 2031 as in 2028. This has the further effect of overstating the need for new floorspace in both 2031 and 2037. Again, this is shown in the attached tables and summarised below.

Summary of Comparison Floorspace Requirements (Based on Different Sales Efficiency Assumptions)	Comparison Goods					
	2015	2020	2025	2028	2031	2037
Total Available Expenditure in North Kent SHENA Area (£m)	1569.1	1863.7	2284.2	2583.4	2920.1	3721.1
Survey Area Residents Spending (town & district centres) (£m)*	430.0	510.2	624.6	706.3	798.1	1016.6
Survey Area Residents Spending (retail parks / foodstores) (£m) *	171.3	203.2	248.7	281.1	317.7	404.5
Inflow of Expenditure (5%) (as stated by GVA)*	31.6	37.5	46.0	52.0	58.7	74.8
TOTAL SPENDING (£m)	632.90	750.90	919.30	1039.40	1174.50	1495.90
Capacity for new floorspace - GVA Study	0	-422	14,348	24,296	36,676	61,129
Capacity for new floorspace - GVA Study (with corrected 2031 figure)	0	-703	14,017	23,942	34,543	57,762
Capacity for new floorspace - based on ERPBN 15 (Dec 2017)	0	-3,058	7,473	14,753	22,389	38,622

Table 3: Summary of Comparison Floorspace Requirements (Based on Alternative Sales Efficiency Assumptions)

Further clarification is therefore required as to why the sales densities that have been used in the Retail Study are appropriate – not least because as demonstrated above, an adjustment to reflect published forecast data can make a significant difference to the amount of floorspace that is required across the Plan period (in quantitative terms).

Amendments to sales densities as specified above would also affect the recommendations of the Retail Study at Section 10 which is to plan for need arising in the period to 2028 under the baseline Experian forecast (GVA, paragraph 10.25). The figures above would suggest that the Council need only to plan for 14,750 sqm across the Plan period (as opposed to 24,300 sqm).

Secondly, it also has to be recognised that the assumptions made regarding the sales efficiencies achieved by existing retail floorspace, will in part be influenced by the amount of new retail floorspace developed. During the period of economic boom in the 2000's many retailers were able to secure higher levels of sales densities than are seen now and thus, in many cases it would be possible for existing stores to accommodate higher sales levels. Indeed, this is what would be expected to happen if, as forecast, annual spend on comparison goods continues to increase year on year, but no new floorspace were to be developed.

Such an improvement in existing store performance is also to be expected, if, the aim is to increase the vibrancy, footfall and turnover of the existing centres.

As such, the assumed sales efficiency figure for any retail capacity analysis must itself be informed by the policy objectives of any development or planning strategy and in cases such as Medway where there is a clear need to improve the performance of existing businesses adopting an over cautious figure as GVA have done will result not only in a higher requirement for new floorspace but will also make it more difficult for the existing businesses in the town centre to improve their viability and withstand new competition.

The result is that it is imperative that Medway Council consider how any forecast estimates for new floorspace have been derived and then ensure that any policy outcomes reflect the qualitative needs of the area and the overall strategic aims of the Local Plan as well as the quantitative analysis.

Available Expenditure / SFT Assumptions

The other side of any retail need assessment is the amount of expenditure that can be expected to be made in shops in the future, and this relies on forecasting both how individual expenditure will change (usually increase) on an annual basis and how much of that expenditure may be spent in stores.

As with the sales efficiency assumptions detailed above, Experian provides forecasts for these elements on an annual basis and these can change quite significantly over a relative short period. The GVA study uses the ERPBN 12.1 as the basis for the assessment (GVA, Table 2). Two years on, the current forecasts are slightly different with the expected increase in comparison expenditure per capita per annum showing significant variation in the short term to 2020 and then stabilising at around +3.2% per annum from that date. This is just 0.1% per annum less than assumed for the longer term

period in the GVA assessment, but the cumulative effect is to reduce the growth factor by nearly 10% by 2037 (see Table 4 below).

Year	GVA				Latest Experian (ERPBN 15)			
	Expenditure Growth Rate PA	Index Showing Cumulative Expenditure Growth	SFT Allowance	Index Showing Effect on Available Expenditure with SFT	Expenditure Growth Rate PA	Index Showing Cumulative Expenditure Growth	SFT Allowance	Resulting Change to Base
2013								
2014	4.6%		11.70%		3.6%		11.90%	
2015	5.6%	100	12.50%	87.5	5.2%	100	12.20%	87.8
2016	3.3%	103	13.20%	89.7	5.0%	105	13.50%	90.8
2017	3.3%	107	14.00%	91.8	2.3%	107	14.80%	91.5
2018	3.3%	110	14.70%	94.0	0.9%	108	15.40%	91.7
2019	3.3%	114	15.30%	96.4	2.1%	111	15.90%	93.1
2020	3.3%	118	15.70%	99.2	3.2%	114	16.40%	95.5
2021	3.3%	122	15.90%	102.2	3.2%	118	16.90%	97.9
2022	3.3%	126	16.00%	105.4	3.2%	122	17.20%	100.7
2023	3.3%	130	16.00%	108.9	3.2%	126	17.40%	103.7
2024	3.3%	134	16.00%	112.5	3.2%	130	17.50%	106.9
2025	3.3%	138	15.90%	116.4	3.2%	134	17.50%	110.3
2026	3.3%	143	15.90%	120.2	3.2%	138	17.50%	113.8
2027	3.3%	148	15.80%	124.3	3.2%	142	17.60%	117.3
2028	3.3%	153	15.70%	128.6	3.2%	147	17.60%	121.1
2029	3.3%	158	15.70%	132.8	3.2%	152	17.70%	124.8
2030	3.3%	163	16.60%	135.7	3.2%	156	17.70%	128.8
2031	3.3%	168	15.50%	142.1	3.2%	161	17.80%	132.7
2032	3.3%	174	15.50%	146.7	3.2%	167	17.80%	137.0
2033	3.3%	179	15.40%	151.8	3.2%	172	17.90%	141.2
2034	3.3%	185	15.30%	157.0	3.2%	177	17.90%	145.7
2035	3.3%	191	15.20%	162.3	3.2%	183	18.00%	150.2
2036	3.3%	198	15.20%	167.7	3.2%	189	18.00%	155.0
2037	3.3%	204	15.20%	173.2	3.2%	195	18.00%	160.0

Table 4: Updated Sales Efficiency Assumptions

Experian have also revised their forecasts for store sales, increasing the amount that is now expected to be spent by SFT, mainly online. This, combined with the reduction in expenditure will decrease the demand for new floorspace by around 13% from that forecast by GVA by 2037 (60% above 2015 base compared with 73% above on the GVA analysis). At 2028, the date which GVA recommend the Council plan for new provision, the figure is some 7.5% lower (21.1% above 2015 base rather than 28.6%).

An alternative way of viewing this is that the increase in available expenditure assumed by GVA will not now be achieved until 2030, whilst the revised 2028 figure is more akin to the 2025 figure prepared by GVA.

This in turn will further reduce the capacity for new space as set out above, reducing the 2028 revised forecast of around 14,750 sqm to just 7,500 sqm (the 2025 figure).

It is the figure of 7,500 sqm (less recent approvals) that the local plan should be planning for.

Conclusions on the GVA SHENA Retail Study as Part of the Evidence Base.

On the basis of the above comments and those provided in the enclosed Supplementary Note, we consider that the GVA Retail Assessment as set out in the North Kent SHENA – Retail & Commercial Leisure Assessment 2015 is neither transparent or reliable as the basis for the Medway Local Plan Retail and Town Centre policies in relation to future retail floorspace requirements.

However, notwithstanding the above, it is encouraging to note that in terms of specific advice for each of the centres in Medway, the North Kent Study advises that Chatham should remain at the top of the hierarchy and should be the main location for additional comparison goods retail growth. No further comparison retail is recommended for any of the other centres (including Hempstead Valley).

In order to improve Chatham, it is recommended that:

- public realm works be undertaken to improve its appearance;
- sites are actively brought forward;
- further opportunities for convenience retail are explored;
- there is a need to improve and plan for a stronger evening economy through commercial leisure provision; and
- the Council resist out-of-centre proposals.

We fully support the abovementioned recommendations.

Policy RTC1: Retail Hierarchy (Questions RTC1 – RTC5)

We broadly support the proposed retail hierarchy and consider that it represents an effective approach for managing the retail hierarchy in Medway (Question RTC1). We also agree with the definition of Chatham as the primary centre at the top of the hierarchy (Question RTC2).

We do however wish to make the following comments / observations:

- convenience goods retail should also be promoted in Chatham Town Centre (Question RTC1);
- as per the adopted Plan for Medway, it also needs to be made clear that further retail development at Hempstead Valley District Centre will be restricted to protect the vitality and viability of Chatham Town Centre and to ensure plans for future investment are not undermined (Question RTC2);
- referring to Question RTC4, Chatham Dockside should not be recognised as forming part of Medway's retail hierarchy – whilst there are retail uses in this location, the scheme as a whole does not have the features of a traditional town / district centre – notably it lacks a wider mix of uses including civic, educational and residential uses; proximity to residential areas making the centre accessible on foot or by bicycle; and a public transport focus.

Policy RTC2: Sequential Assessment (Question RTC6)

Question 'RTC6' queries whether the draft Policy RTC2 policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres.

Our response to this question is that it is slightly unclear from the abovementioned draft policy as to whether proposals outwith Chatham Town Centre (i.e. those within District Centre locations including Hempstead Valley) would be required to demonstrate whether there are no sequentially preferable sites in Chatham Town Centre before they are considered acceptable (and indeed whether this is Medway Council's intention).

This is because this approach would represent a slight departure from national guidance which does not differentiate between town and district centre locations in respect of the application of the sequential test. However, it is consistent with the NPPF in terms of the requirement to define a retail hierarchy.

We would argue that such an approach is necessary in this case owing to the fragility of Chatham Town Centre and the need to re-establish itself as the Borough's top tier / primary centre. The evidence to support this approach is compelling. It is also a specific recommendation of the GVA North Kent Retail Study.

Policy RTC3: Impact Assessments (Question RTC7 – RTC9)

The following questions are posed by Medway Council in respect of draft Policy RTC3:

- do you consider that the proposed policy represents an effective approach for securing and strengthening the role of Medway's traditional town centres? (Question RTC7);
- do you agree with the proposed approach to impact assessments? (Question RTC8);
- what do you consider would represent an appropriate size threshold for developments to undertake an impact assessment? (Question RTC9).

In response to these questions, we note that the supporting text to draft Policy RTC3 appears to suggest that Hempstead Valley is akin to an out of centre development and yet the policy itself, as currently drafted, would not require an impact assessment for proposals in this location to be undertaken as it is a designated District Centre.

Conversely, draft Policy RTC12 (referred to below) appears to support the need for impact and sequential assessment for proposals at Hempstead Valley. There is a need to make the Council's strategy clear in regard to Hempstead Valley from the outset to avoid ambiguity.

The supporting text to draft Policy RT3 also asks consultees as to what they consider represents an appropriate size threshold for developments to undertake an impact assessment (Question RTC9).

We would argue a much lower threshold than that set out in the NPPF is required and can put forward the requisite evidence to justify this approach. This includes referring to the North Kent Retail Study which notes to the underperformance of Chatham and the vulnerability of centres including Rainham, Strood and Gillingham. It goes on to state that: *"these centres have limited national retailer representation and are typified by low value/order retailer representation and a sub-standard public realm reflective of the lack of investment and a vulnerable local economy. The health of Medway's centres suffers while out of centre localities prove more viable and desirable. It is likely that further out of centre permissions will exacerbate the vulnerability and have a lasting detrimental impact on our centres"*.

As stated in our previous representations, it is important that the Council undertake a robust assessment of thresholds to identify a locally set threshold or thresholds over which impact assessment will be required for main town centre uses (office, leisure, retail etc). The NPPF threshold of 2,500 sqm is too high, particularly in respect of town centres such as Chatham which are vulnerable and even a small out of centre scheme could have a disproportionate effect on the vitality and viability of the centre.

Our experience of the NPPF threshold is that developers of out of centre proposals increasingly size a scheme just under the NPPF threshold on the basis of there not being a unit available within a town centre location that meets all of the operational requirements of an occupier. This then allows them to circumvent the requirement to assess the proposals against the impact test - the NPPF is clear that this is only required over the nationally set threshold or where a locally set threshold, based on robust evidence, is set.

We would therefore strongly recommend that research led by Medway Council (or an appropriate consultant) is undertaken as soon as possible to assess where the current balance of unit sizes lies in each of the Borough's town, district and local centres. A suitable threshold or thresholds can then be set which supports the spatial strategy to promote Chatham Town Centre as Medway's main town centre.

We would also suggest that the Council or their appointed consultant should also consider how the proposed policies should be applied to A3/A4/A5 uses, given they are generally smaller than A1 units but, with an increasing emphasis on leisure activities are an increasingly important component of a healthy and viable town centre.

Policy RTC5: Role, Function and Management of Uses in Centres – Frontage (Questions RTC10 – RTC13)

The Pentagon Centre is identified as falling within the Primary Shopping Frontage where non-A1 retail uses are permitted, subject to certain criteria being met. We have three main observations in regard to this Policy:

- The first is that the first floor of the Pentagon Centre appears to have been defined as Primary Shopping Frontage – this is at odds with the recommendations of the North Kent Retail Study which made recommendations for primary and secondary frontages in the Town Centre which includes the ground floor of the Pentagon Shopping Centre (Primary Shopping Frontage) and the first floor of the Pentagon Shopping Centre (Secondary Shopping Frontage) – we would agree with this analysis not least because footfall on the first floor of the Centre is far lower and there is subdued retailer demand for premises in this location – there is a need to diversify uses in this location to make it more attractive to visitors to the Centre.

The second is that the specified criteria for changes of use in the Primary Shopping is somewhat onerous. The concern is they could prohibit the swift occupation of vacant units within the Pentagon Centre and lead to long term voids where A1 occupiers cannot be found. Indeed, this clause could lead to vacancies beyond the 6-month stipulated period as once it has passed, permission will still be required to change of the use of the unit in question, with Heads of Terms to be signed once permission has been achieved. The specified criteria is also at odds with the supporting text to the overarching Plan Vision which clearly acknowledges the need for the Town Centre to evolve in response to changes in shopping habits and strengthen as a revitalised hub for community and leisure activities.

- Lastly, the Policy as worded is somewhat difficult to interpret and as such could lead to confusion as to how changes of use will be dealt with in the Primary Shopping Frontage. For example, does the policy apply to existing A2 Use Classes which can convert to A1 at any time under permitted development rights? What is meant by 'greater efficiency in the use of upper floors'? If it can be demonstrated that the proposed use is reflective of the role, character and function of the centre, are applicants still required to address the marketing criteria which is somewhat onerous (see above).

Referring to the abovementioned observations, and in addition to the recommendations of the North Kent Retail Study in respect of primary and secondary frontages in the Town Centre (recommendations that we support – see above), we note that the North Kent Retail Study also recommends that:

- the Primary Shopping Area should retain a critical mass of retailing activity, to help ensure strong levels of footfall and complement the diversification of uses in secondary areas of the town centre;
- applications for change of use away from class A1 use within the Primary Shopping Area should be resisted; and
- the Council may wish to consider the use of Article 4 Directions as a means of enforcing this.

We have substantial concerns that the recommendations in the Retail Study in regard to the retention of retail uses in core areas (including a blanket restriction of changes of use away from retail in the Primary Shopping Area) will lead to significant and long-term voids in Chatham Town Centre – voids which could be prevented through applying more flexible and positively worded policies in respect of changes of uses in this location (as called for by the NPPF).

Ellandi is a well-established community shopping centre specialist who has considerable experience in repositioning shopping centres such that they are commercially viable and contribute to the vitality and viability of the town centres that these shopping centres serve. It has owned the Pentagon Shopping Centre since December 2015 (and were asset managers prior to this) and since this time, its

asset managers have worked closely with local and national commercial agents to attract and retain good quality tenants for the Centre which has led to an excellent understanding of the local retail market.

It is with this experience and understanding in mind that we wish to highlight our concerns that blanket restrictions on changes of use in the Primary Shopping Area of Chatham could lead to long term voids where A1 occupiers cannot be found. It is also Ellandi's experience and understanding that leads us to conclude that town centres such as Chatham can benefit significantly from a mix of uses within Primary Shopping Frontages, not least because they help generate additional footfall and encourage increased dwell time.

Whilst we acknowledge that Paragraph 23 of the NPPF states that in drawing up local plans, local planning authorities should define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations, the NPPF (which should be read in full) is also clear that:

- local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century (Para 20);
- investment in business should not be over-burdened by the combined requirements of planning policy expectations - planning policies should recognise and seek to address potential barriers to investment (Para 21);
- local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth (Para 21);
- policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (Para 21).

In this case, we find a number of the recommendations contained within the Retail Study to be inconsistent with the NPPF emphasis on building a strong, competitive economy, not least because it will place a significant burden on town centre investors and their ability to bring forward complementary non-retail uses and respond to market demand, even where it can be demonstrated that these uses will serve to enhance the vitality and viability of Chatham Town Centre. More flexible policies will enable the Town Centre to compete on a level playing field with centres such as Bluewater and Hempstead Valley which continue to improve their non-retail offer in line with consumer demand.

Policy RTC6: Temporary Uses (Question RTC14)

We support draft Policy RTC6 in principle although note this policy would be unnecessary if the Council were more flexible in terms of allowing changes of use within the Primary Shopping Frontage. Policies RTC5 and RTC6 need to be reviewed in the context of the retail / leisure / hospitality market which continues to experience significant challenges. Allowing the introduction of temporary uses is to be regarded as beneficial, albeit it will not be a panacea for vulnerable town centres such as Chatham where there is a need to diversify the existing offer long term in order to address a contracting demand for retail floorspace.

RTC7: Supporting Sustainable and Healthy Centres (Questions RTC15 – RTC19)

The supporting text to this policy implies that this policy will be re-worded in due course with a view to restricting 'high energy density food' outlets, which sell foods high in fat and/or sugar; betting shops; gaming centres; and premises selling alcohol, particularly for off licence sales. Greater clarification is required as to how this policy will eventually be worded to ensure that it does not undermine the vitality and viability of Chatham Town Centre. It should also be acknowledged that certain occupiers which serve, for example, healthy takeaway products will fall under the same Use Classes as those

serving 'high energy density foods' – how this policy will work in practice must therefore be carefully thought through.

RTC8: Hempstead Valley District Centre (Questions RTC20 – RTC22)

We support this policy in principle, although it should be made clear in earlier policies that proposals for retail and town centre development at Hempstead Valley should be commensurate with its role as a District Centre and will be required to undertake an impact and sequential assessment, with preference to be given to potential sequential sites in Chatham Town Centre.

Dockside (Questions RTC23 and RTC24)

Whilst there is no specific policy proposed at present to deal with development at Chatham Dockside, the supporting text to draft Policy RTC8 (Paras 6.33 – 6.35) refers to the Dockside Outlet Centre and states that the Council is preparing further evidence to assess the appropriate future role of Dockside, and in consulting on this plan, is seeking views on what form and scale of further development would be suitable for the area.

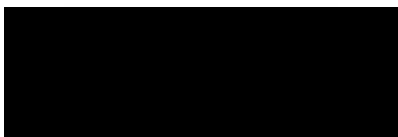
Our view remains as expressed above - that Chatham Dockside should not be recognised as forming part of Medway's retail hierarchy – whilst there are retail uses in this location, it does not have the features of a traditional town / district centre – notably it lacks a wider mix of uses including civic, educational and residential uses; proximity to residential areas making the centre accessible on foot or by bicycle; and a public transport focus. Any allocation of this Centre must have full regard to its impact on the regeneration of Chatham Town Centre and we would suggest that any expansion of retail, service or other town centre uses should be restricted.

Policy RTC12: Retail Parks (Question RTC29)

This policy requires a degree of refinement as presently it is worded in such a way that implies retail parks are to be afforded a degree of policy protection - this is wholly unacceptable. A lower threshold for impact assessment for development proposals in this location is also required as per our comments above.

On behalf our client, we request that we are kept up to date on the progress of the Medway Council Local Plan. We trust that these comments are helpful, and would be happy to meet with you in due course to discuss any of the issues raised in more detail.

Yours sincerely,



Matthew Williams (MRTPI)
Director
Williams Gallagher

Enc 1: Representations to Previous Consultations Submitted on behalf of Chatham LLP / Ellandi (February 2016 and April 2017)

Enc 2: Supplementary Retail Review Note

Enc 3: Alternative Comparison Analysis Tables Prepared by Williams Gallagher

Enclosure 1

13 April 2017

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

**WILLIAMS.
GALLAGHER.**
town planning
solutions

Williams Gallagher
Studio 321
51 Pinfold Street
Birmingham
B2 4AY
williams-gallagher.com

Sent by Email

Dear Sir / Madam

**Medway Local Plan 2035
Development Options Consultation January – April 2017
Representation on behalf of Chatham LLP (c/o Ellandi LLP)**

Williams Gallagher Town Planning Solutions Ltd (Williams Gallagher) act on behalf of Chatham LLP (c/o Ellandi LLP) (Ellandi) who own and manage the Pentagon Shopping Centre in Chatham Town Centre. By way of introduction, Williams Gallagher was formed in January 2017 by Matthew Williams and Heather Gallagher who previously advised Ellandi LLP through Savills (UK) Ltd (Savills).

This letter is submitted to provide observations in connection with the Medway Council Local Plan 2035 Development Options Consultation. It follows representations submitted by Savills on Ellandi's behalf in connection with the Local Plan Issues and Options Consultation in February 2016 (enclosed with this letter for ease of reference).

To summarise, our comments are primarily concerned with Section 6 of the Consultation Document which sets out the Council's policy approach to retailing and town centres in Medway. Our review of this Section confirms, inter alia, that:

- the Council will seek to strengthen and enhance its network of town, neighbourhood, local and village centres to provide a focus for retail, leisure, cultural and community activities;
- the Local Plan will make provision for the allocation of retail floorspace for comparison and convenience shopping in line with the needs of Medway's growing communities;
- the Local Plan will establish a retail hierarchy, set out defined town centre boundaries and establish primary shopping areas, primary and secondary frontages to inform a town centre first policy approach to secure the vitality and performance of centres, and its sequential approach;
- the Local Plan will provide policy to inform a retail impact assessment threshold approach;
- the Council will seek to retain the retail core and strengthen the character and unique offer of each town and district centre through management of uses, assessed through satisfaction of an A1 retail percentage threshold, or defined appropriate uses;
- the Council will consider the introduction of policy on temporary uses to address vacancies to boost the vibrancy and vitality of the Centre; and

- the Council will have regard to the uses, format and scale, location, access and parking offered by retail warehouses/parks to define policy, with the aim of securing the role, vitality and vibrancy of town centres.

In addition to the above, Paragraph 6.1 of Section 6 confirms that Medway Council has recently commissioned a Retail Study in collaboration with Gravesham Council (the North Kent Retail and Commercial Leisure Assessment dated November 2016). This has been published to inform the Development Options consultation and has been utilised to establish the retail needs of Medway up to 2037.

The following retail floorspace requirements are cited in the Consultation Document:

- a need for 46,100 sqm comparison floorspace by 2031 and 70,500 sqm by 2037;
- a need for 12,300 sqm of convenience retail floorspace by 2031 and 13,200 sqm by 2037.

In terms of specific advice for each of the centres, the Consultation Document (Paragraph 6.3) notes the findings of the North Kent Retail Study, advising that Chatham remains at the top of the hierarchy and should be the main location for additional comparison retail growth (which we support). It also notes that no further comparison retail is recommended for any of the other centres.

In order to improve Chatham, it summarises a series of recommendations from the North Kent Retail Study (again, which we support):

- a need to undertake public realm works to improve its appearance;
- a need to actively bring forward sites;
- the need to explore further opportunities for convenience retail;
- a need to improve and plan for a stronger evening economy through commercial leisure provision; and
- a need to resist out-of-centre proposals.

The Consultation Document also confirms at Paragraph 6.9 that the Council will consider the need to review the town centre boundaries set in the 2003 Medway Local Plan and present proposals for consultation as part of the process of preparing the new Local Plan. It also states that the Council will seek views on the definitions of primary and secondary frontage areas, and primary shopping areas.

Finally, Paragraph 6.21 of the Consultation Document notes an increase in planning applications for out of centre retail development which in the council's view, underlines the relevance of providing updated policy on retail warehousing and retail parks in the new Local Plan. It states that this could include consideration of the role of edge of centre sites where there is evidence that the vitality and viability of centres could be boosted through linked trips, and appropriate provision is made for a good quality public realm, access and parking.

Williams Gallagher Observations

As stated above, this representation is principally concerned with Section 6 of the Development Options Consultation Document, the content of which is summarised above.

We do however wish to begin by lending our support to the Council's overarching commitment to Chatham Town Centre at Paragraph 2.33 of the Consultation Document which includes, inter alia, an acknowledgement that Chatham is central to the success of Medway's development.

We are also pleased to note that the Council has commissioned a new Retail Study for Medway which is available for review and the findings summarised in the Consultation Document. Our review of this document confirms that it provides a series of recommendations for the emerging Plan which we assume will be considered by the Council in due course and articulated as policy following this stage of consultation.

In view of this, we wish to express the following high level concerns about this document and how it has been interpreted in Section 6 of the Development Options Consultation document.

Retail Need

As highlighted above, Paragraph 6.1 of the Consultation Document indicates that within Medway there is:

- a need for 46,100 sqm comparison floorspace by 2031 and 70,500 sqm by 2037;
- a need for 12,300 sqm of convenience retail floorspace by 2031 and 13,200 sqm by 2037.

A review of the Retail Study itself (prepared by GVA) confirms that the above figures assume that existing commitments in the Medway area will not come forward. Accordingly, they are not considered to be an accurate reflection of the final recommendations set out at Section 10 of the Retail Study.

The actual quantitative requirement identified by the Retail Study is for 14,300-22,400 sqm net additional comparison goods floorspace by 2025, rising to 61,100-68,100 sqm net by 2037. This is based on the assumption that the commitments for new retail floorspace – which include a site in Chatham Town Centre, and new floorspace in Hempstead Valley – come forward as planned.

The Retail Study then goes on to recommend at Paragraph 10.25 that given the inevitable change in the future passage of time, continued economic uncertainty and expected evolution and change to housing numbers, that instead of planning for the full requirement identified by the Study, the Council should plan for need arising in the period to 2028 under the baseline Experian forecast. This equates to the delivery of around 24,300 sqm net of comparison goods floorspace over the full Plan period (as opposed to 70,500 sqm as specified by the Consultation Document).

This is an important recommendation which does not appear to have been taken on board by the Consultation Document - which is of concern because based on economic modelling alone, the capacity identified by the Retail Study is significant and likely to have severe implications for the vitality and viability of Medway's network of centres where this capacity cannot be accommodated in town centre locations (due to physical and economic constraints). It opens the door for speculative and harmful development in inappropriate locations.

At present, it would appear that the Consultation Document has only taken on board the results of the economic modelling and has disregarded the final recommendations of the Retail Study which is to plan for a more realistic figure across the Plan period. Both the NPPF and Practice Guidance clearly state that need is a product of both quantitative and qualitative assessment – accordingly, an element of realism must be applied once quantitative assessment has been undertaken. This needs to account for the health of existing centres, investor sentiment and the extent to which relying on quantitatively derived figures in isolation could lead to significant adverse impacts on town centres.

Importantly, PPG states that:

"It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise, as set out in Paragraph 26 of the National Planning Policy Framework". (Paragraph: 006 Reference ID: 2b-006-20140306)

In this case, it is considered that the floorspace identified by the Consultation Document places undue reliance on the results of the economic modelling (without commitments) and disregards other important qualitative factors which would point towards the fact that Chatham Town Centre would struggle to deliver such large amounts of comparison goods retail floorspace across the Plan period. This leaves the door open for speculative and harmful development coming forward in inappropriate and unsustainable locations. We would therefore encourage the Council to consider the final recommendations of the Retail Study in more detail and to adopt more realistic capacity figures going forward (having regard to the PPG requirement to ensure that main town centre uses are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise).

Sales Density / Efficiency Assumptions

Paragraph 6.19 of the Retail Study sets out GVA's assumptions in regard to sales efficiencies which represent the ability of retailers to increase their productivity through improvements to sales densities. It goes on to state that Experian does not provide clear guidance on sales densities and as such it makes an assumption as to the improvement to the sales efficiencies of existing and committed floorspace equating to:

- 1.65% per annum for comparison goods; and
- 0.3% per annum for convenience goods.

In regard to comparison goods in particular, we would query the use of these assumptions, particularly when we consider Experian does in fact provide a clear set of forecasts for improvements to sales densities up to 2035. For comparison goods, the latest Experian forecast growth rates (as set out in the Experian Retail Planner Briefing Note (ERPBN) 14 (November 2016)) are as follows:

Comparison Goods	2015	2016	2017	2018	2019-23	2024-35	Average Sales Density Growth Rate 2015 – 35
Density Growth Rate	5.3%	2.7%	1.5%	1.0%	2.3%	2.2%	2.3%

Table 1: Retail Sales Density for Comparison Goods including Changes to Floorspace
Source: Table 4b (ERPBN 14)

Applying these growth rates to the turnover of existing floorspace (as well as the turnover of new shops) would result in far higher sales densities in the test years which, as can be seen below, would reduce the overall capacity for new comparison goods retail floorspace by some margin:

	COMPARISON GOODS					
	2015	2020	2025	2028	2031	2037
TOTAL SPENDING (£m)	£632.95	£750.89	£919.28	£1,039.38	£1,174.55	£1,495.93
Existing Retail Floorspace (sqm net)	111,734	111,734	111,734	111,734	111,734	111,734
Sales per sqm net (£) – Based on Experian Retail Sales Densities (RSD)	£5,665.00	£6,241.79	£6,979.72	£7,450.59	£7,953.22	£9,062.51
Sales per sqm net (£) – Based on GVA Retail Sales Densities (RSD)	£5,665.00	£6,148	£6,672	£7,008	£7,360	£8,120
Sales from Existing Floorspace (£m)	£632.95	£697.42	£779.87	£832.48	£888.65	£1,012.59
Sales from Commitments (£m)	£0.00	£66.70	£72.40	£76.00	£79.90	£88.10
Residual Spending to Support New Floorspace (£m)	£0.00	-£13.23	£67.01	£130.90	£206.00	£395.24
Sales per sqm in New Shops (£m) – Based on Experian RSD	£6,000.00	£6,610.90	£7,392.46	£7,891.18	£8,423.54	£9,598.42
Sales per sqm in New Shops (£m) – Based on GVA RSD	£6,000	£6,512	£7,067	£7,422	£7,422	£8,188
CAPACITY FOR NEW FLOORSPACE (SQM NET) – BASED ON EXPERIAN RSD	0	-2,001	9,064	16,588	24,456	41,178
CAPACITY FOR NEW FLOORSPACE (SQM NET) – BASED ON GVA RSD	0	-418	14,349	24,297	36,684	61,133

Table 2: Updated Capacity Assessment (based on latest Experian Forecasts of Retail Sales Densities)

Notes

1. Figures in black derived from Table 8b, Appendix 2 of the GVA North Kent Retail & Commercial Study
2. Figures in red are Williams Gallagher revised calculations based on Experian Sales Density projections set out at Figure 4b of Experian Retail Planner Briefing Note 14 (November 2016) and as summarised in Table 1 above

Further clarification is required as to why the sales densities that have been used in the Retail Study are appropriate – not least because as demonstrated above, an adjustment to reflect published forecast data can make a significant difference to the amount of floorspace that is forecast across the Plan period (in quantitative terms).

Amendments to sales densities as specified above would also affect the recommendations of the Retail Study at Section 10 which is to plan for need arising in the period to 2028 under the baseline Experian forecast. The figures above would suggest that the Council need only to plan for 16,588 sqm to 2028 (as opposed to 24,297 sqm).

Town Centre Uses / Designations

The Policy Approach to Retail and Town Centres at Page 59 of the Consultation Document confirms that the Council will seek to retain the retail core and strengthen the character and unique offer of each town and district centre through management of uses, assessed through satisfaction of an A1 retail percentage threshold, or defined appropriate uses.

In respect of this particular matter and referring to Chatham, we note that the North Kent Retail Study has already made recommendations for primary and secondary frontages in the Town Centre which includes the ground floor of the Pentagon Shopping Centre (Primary Shopping Frontage) and the first floor of the Pentagon Shopping Centre (Secondary Shopping Frontage).

It also recommends that:

- the Primary Shopping Area should retain a critical mass of retailing activity, to help ensure strong levels of footfall and complement the diversification of uses in secondary areas of the town centre;
- applications for change of use away from class A1 use within the Primary Shopping Area should be resisted; and

- the Council may wish to consider the use of Article 4 Directions as a means of enforcing this.

Whilst we support the proposed frontages in principle, we are concerned that the recommendations in the Retail Study in regard to the retention of retail uses in core areas (including a blanket restriction of changes of use away from retail in the Primary Shopping Area) will lead to long term voids in Chatham Town Centre – voids which could be prevented through applying more flexible and positively worded policies in respect of changes of uses in this location (as called for by the NPPF).

Ellandi is a well-established community shopping centre specialist who has considerable experience in repositioning shopping centres such that they are commercially viable and contribute to the vitality and viability of the town centres that these shopping centres serve. It has also owned the Pentagon Shopping Centre since December 2015 (and were asset managers prior to this) – since this time, its asset managers have worked closely with local and national commercial agents to attract and retain good quality tenants for the Centre which has led to an excellent understanding of the local retail market.

It is with this experience and understanding in mind that we wish to highlight our concerns that blanket restrictions on changes of use in the Primary Shopping Area of Chatham could lead to long term voids where A1 occupiers cannot be found. It is also Ellandi's experience and understanding that leads us to conclude that town centres such as Chatham can benefit significantly from a mix of uses within Primary Shopping Frontages, not least because they help generate additional footfall and encourage increased dwell time.

We acknowledge that Paragraph 23 of the NPPF states that in drawing up local plans, local planning authorities should define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations. However, the NPPF (which should be read in full) is also clear that:

- local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century (Para 20);
- investment in business should not be over-burdened by the combined requirements of planning policy expectations - planning policies should recognise and seek to address potential barriers to investment (Para 21);
- local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth (Para 21);
- policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (Para 21).

In this case, we find the recommendations contained within the Retail Study to be inconsistent with the NPPF emphasis on building a strong, competitive economy, not least because it will place a significant burden on town centre investors and their ability to bring forward complementary non-retail uses and respond to market demand, even where it can be demonstrated that these uses will serve to enhance the vitality and viability of Chatham Town Centre. More flexible policies will enable the Town Centre to compete on a level playing field with centres such as Bluewater which continue to improve their non-retail offer in line with consumer demand.

We support the intention to consider the introduction of policy on temporary uses to address vacancies to boost the vibrancy and vitality of the Centre.

Requirement for Impact Threshold

In addition to the above, we note that the Consultation Document indicates that the Plan will include a policy which will set a local threshold for requiring retail impact assessment. We fully support this proposal. However, we have been unable to locate any evidence which would support the introduction of such a threshold which is essential to ensure it is set at an appropriate level and can be defended at Examination.

As stated in our representation dated February 2016, the Council is required to undertake a robust assessment of thresholds to identify a locally set threshold or thresholds over which impact assessment will be required for main town centre uses (office, leisure, retail etc). The NPPF threshold of 2,500 sqm is very high, particularly in respect of town centres such as Chatham which are vulnerable and even a small out of centre scheme could have a disproportionate effect on the vitality and viability of the centre.

Our experience of the NPPF threshold is that developers of out of centre proposals increasingly size a scheme just under the NPPF threshold on the basis of there not being a unit available within a town centre location that meets all of the operational requirements of an occupier. This then allows the developer to circumvent the requirement to assess the proposals against the impact test - the NPPF is clear that this is only required over the nationally set threshold or where a locally set threshold, based on robust evidence, is set.

We would therefore recommend that research led by Medway Council (or an appropriate consultant) is undertaken as soon as possible to assess where the current balance of unit sizes lies in each of the Borough's town, district and local centres. A suitable threshold or thresholds can then be set which supports the spatial strategy to promote Chatham Town Centre as Medway's main town centre.

Retail Parks

As a final point, we note there is reference to Medway's retail parks throughout the Consultation Document, culminating in the following statement at Page 59:

"The Council will have regard to the uses, format and scale, location, access and parking offered by retail warehouses/parks to define policy, with the aim of securing the role, vitality and vibrancy of town centres".

Paragraph 6.21 also states that:

"Recent years have seen many more out of centre retailers seeking permission and securing approval compared to in-centre locations. This underlines the relevance of providing updated policy on retail warehousing and retail parks in the new Local Plan. This could include consideration of the role of edge of centre sites where there is evidence that the vitality and viability of centres could be boosted through linked trips, and appropriate provision is made for a good quality public realm, access and parking".

We are unclear as to what is meant by these statements which could be interpreted in one of two ways, either:

- that Medway Council will seek to restrict the proliferation of the Borough's retail parks in the interests in protecting its network of allocation; or
- that Medway Council considers retail parks to have a role to play in meeting the retail needs of the Borough.

In our view, the focus should be on providing for retail needs in the Borough's town centres first and foremost, only then should edge of centre sites be considered (which are well connected to the relevant town centre). The expansion of out of centre retail parks in the Borough remains of significant concern to Ellandi and should be subject to full scrutiny through the plan making process to avoid significant adverse impacts on Medway's network of centres.

On behalf our client, we request that we are kept up to date on the progress of the Medway Council Local Plan. We trust that these comments are helpful, and would be happy to meet with you in due course to discuss any of the issues raised in more detail.

Yours faithfully

A large black rectangular box redacting the signature of Matthew Williams.

Matthew Williams
Williams Gallagher
Town Planning Solutions Ltd

Enclosed: Savills Representation dated 29 February 2016

29 February 2016



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

Matthew Williams

Innovation Court
121 Edmund Street
Birmingham B3 2HJ

savills.com

Dear Sirs

REPRESENTATIONS TO THE MEDWAY COUNCIL LOCAL PLAN ISSUES & OPTIONS CONSULTATION

Savills (UK) Limited (Savills) act on behalf of Ellandi LLP who own and manage the Pentagon Shopping Centre in Chatham Town Centre. This letter is submitted to provide observations in connection with the Medway Council Local Plan Issues and Options 2012-2035 Document.

Context to Representations

Ellandi was formed in 2008 and is a leading specialist shopping centre investment and asset manager. The approach is to proactively transform the towns in which it invests by working with occupiers and other stakeholders to ensure that its shopping centres perform a successful and vibrant role for the local communities that they serve. By pioneering a new form of shopping centres that are referred to as 'Community Shopping Centres', Ellandi is successfully increasing footfall for not only its shopping centres but the associated town centres securing. The result is a substantial positive effect on the vitality and viability of the associated town centre.

The Ellandi Community Shopping Centre Initiative is a truly community-orientated initiative which, amongst other things, seeks to facilitate through the planning process the repositioning of Ellandi's shopping centres, and the town centres they serve, at the heart of their local communities. By applying financial and intellectual capital to often under-invested locations, Ellandi has become a market leader in promoting centres. This promotion includes engaging with local stakeholders, empowering centre managers to connect with local people through events and charities and incubating complementary ancillary uses to ensure that the towns in which they operate thrive.

Driving Ellandi's strategic focus is a fundamental and unwavering belief that community improvement, regeneration and financial return are not mutually exclusive. Rather, it considers its shopping centres have a major role to play in terms of creating a positive impact that improves / regenerates town centres to the benefit of all those involved. This in turn has far-reaching and long term benefits including job creation, social cohesion and encouraging sustainable patterns of travel.

Importantly, Ellandi recognises that the town planning system has a fundamental role to play in supporting their overarching objectives and therefore welcomes this opportunity to engage with the Medway Local Plan at this early preparatory stage. Ellandi look forward to continuing their positive working relationship with Medway Council to ensure the Local Plan promotes Chatham Town Centre as a focus for regeneration and growth and affords it adequate policy protection so that the investment strategy for the Centre can be brought forward effectively.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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The Pentagon Shopping Centre

Ellandi acquired the Pentagon Shopping Centre in December 2015 as it provides substantial opportunities for positive asset management to enhance the retail, leisure and community offer within Chatham Town Centre. The town is the administrative headquarters of Medway Unitary Authority, as well as its principal shopping centre, being of sub-regional importance in providing goods and services.

The Pentagon Centre is located within the main shopping area of the Town Centre alongside the High Street. It currently comprises of 330,000 sq ft of retail space on two levels, with a 430 space car park. Adjacent to one of the largest Primark stores in the South East, key tenants include Boots, Sainsburys, New Look, JD and Wilko.

Chatham Town Centre has already benefitted from a significant regeneration programme which includes the new bus terminal, related infrastructure and town centre promotion. Ellandi has aspirations to work in conjunction with Medway Council to deliver improvements to the Pentagon Centre including introducing a large food store, leisure facilities and reconfiguring existing units to create larger floorplates capable of meeting modern retailers' requirements.

It is with the above investment in mind that Ellandi wish to make a number of practical observations in regard to the Medway Council Local Plan which, amongst other things, is intended to address the management and growth of the Authority's Main Town Centre (Chatham) and to ensure that it continues to fulfil a central role for both residents and visitors.

Our observations are focused in response to the key questions raised in the Issues and Options Consultation document. They are designed to be productive, to ensure the vitality and viability of Chatham Town Centre is preserved and enhanced in line with National Guidance, and to assist the Local Planning Authority in advance of the Local Plan being progressed towards Examination.

Developing a Vision for Medway in 2035

Q1. What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

Ellandi support the overarching approach to guide the future development of Medway, for it to be an economically successful, attractive and vibrant place where people want to be. This approach should require a focus on reinvigorating town and local centres within the Authority, and in particular that of Chatham as the principal shopping centre at the top of the settlement hierarchy.

It is noted that such an approach is best set out within the National Planning Policy Framework (NPPF) at Paragraph 23 where it is stated that Local Planning Authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. The NPPF defines suitable 'main town centre uses' as retail, leisure, entertainment facilities, which includes restaurants, bars and offices.

The 'Context to Representations' section of this letter sets out the vision that Ellandi is progressing with the regeneration of the Pentagon Shopping Centre. This vision is wholly consistent with the current strategy of the adopted Core Strategy and one that we would ask is maintained and supported by the new Local Plan. Changing the focus would undermine the investment plan to regenerate the Pentagon Shopping Centre as a Community Shopping Centre.

There are development opportunities throughout Chatham Town Centre which should be identified within the new Local Plan as part of a Masterplan / investment strategy for the town centre. The Masterplan / investment strategy will assist in defining how Chatham Town Centre can continue to contribute towards meeting a phased plan led need for employment, retail and housing development.

This approach is in accordance with Paragraph: 002 Reference ID: 2b-002-20140306 of the planning practice guidance which states:

“A positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits. Once adopted a Local Plan, including any town centre policy that it contains, will be the starting point for any decisions on individual developments. Local planning authorities should work with the private sector, Portas Pilot organisations, town teams, neighbourhood planning groups, town centre management organisations and other relevant groups when developing such strategies. Non-planning guidance produced by other Government Departments and the sector may be useful in producing such a strategy.”

Strategic Issues

Q2. What do you think are the strategic issues the Local Plan needs to address?

Ellandi note the need for the Council to consider the preparation of the Medway Local Plan within the wider context presented by its location within the Thames Gateway growth area and the proximity of London. Accordingly, the Council will need to assess a range of key cross-boundary strategic issues which cover the need to accommodate a significant increase in housing development and make sure that there is sufficient land available to support economic growth at the same time.

Whilst the requirement to meet housing needs over the plan period is an important consideration it far too often becomes the focus of the spatial strategy with other land use strategies given minimal attention. The Council must therefore ensure sufficient assessment of the retail need across the Plan area, taking into account cross-boundary requirements, is also undertaken. Although an assessment to identify capacity for future retail growth within Medway has been carried out as part of the North Kent Strategic Housing and Economic Needs Assessment (SHENA) (March 2015) this will still require a substantial update to the Medway Council Retail Needs Survey which was undertaken in 2009 and is now out of date. Once updated, this information should be used to define an appropriate retail strategy that is cognisant of the quantitative growth in expenditure for Medway along with a qualitative assessment to understand whether meeting all defined expenditure growth is desirable. This research and analysis is critical in forming a sustainable retail strategy for Medway to 2035.

Q3. How should the Council respond to these issues?

In order to respond effectively to the strategic issues which are identified the Council will need to undertake an update to its evidence base. This should not just seek to roll forward capacity figures to set the quantum of floorspace that development management policies will need to accommodate. The requirement for a significant increase in new housing and economic growth will necessarily form the backdrop to assessing both quantitative capacity but also the qualitative need for further retailing within Medway. The Plan must therefore provide a clear strategy as to where and when any further retail development will be accommodated to ensure that the town centres first approach of the National Planning Policy Framework (NPPF) is properly considered and is not undermined by plan led capacity being brought forward in advance of the corresponding population growth envisaged through substantial housing requirements. This should also take account of the potential implications that any expansion of the Bluewater Shopping Centre may have on defined centres within Medway such as Chatham.

Ellandi would specifically highlight the need for:

- A Threshold Policy for Main Town Centre Uses Impact Test – ‘Evidence and Justification Assessment’ to set out the evidence justifying a lower threshold for impact assessment within the authority compared to the 2,500 sq m limit set out in the NPPF;

- An Investment Strategy for Chatham Town Centre which builds upon work carried out for the emerging 'Chatham Placemaking Masterplan' and seeks to bring together the range of development briefs / frameworks which have been prepared for the Town Centre over the last decade. This should all be translated into the Local Plan; and
- A comprehensive update of the Medway Retail Study, including new household surveys that reflect cross-boundary shopping patterns.

The objectively assessed need for retail / traditional B Class employment and residential growth should be considered as strategic issues within the Plan so that the plan led need is supported by a clear spatial strategy for phased growth over the lifetime of the Plan. This fosters investor confidence and also allows for triggers to be built into the strategy, such as partial review, should any parts of the strategy fail or not deliver as anticipated.

This approach will secure the flexibility that the NPPF calls for over the lifetime of the plan, but ensures that the spatial strategy for growth is only altered through the plan making process where cross-boundary implications are appropriately considered, rather than through ad-hoc updates to evidence outside of the plan process.

Retail, Commercial Leisure & Town Centres

Q25. Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?

It is noted at paragraph 10.8 of the consultation document that whilst Chatham is Medway's highest order centre, it is underperforming against what could be expected for a centre of its size and scale.. To address this Ellandi advocate that any substantial redevelopment opportunities incorporating retail uses should be prioritised within Chatham Town Centre in accordance with its position at the top of the settlement hierarchy. Lower order centres should seek smaller scale improvements that respect their size and function. Any new policy should therefore be clear that scale will be integral to decisions on proposals for new town centre uses and that this will be assessed in relation to the town centre hierarchy.

As stated earlier in this letter, there is a need for the Council to commission a new study to understand potential and future requirements for retail and other town centre uses. The existing retail evidence base is out of date for the purpose of plan making.

Guidance on the preparation of the evidence base to underpin the strategy and development management policies of Local Plans is set out within the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). Paragraph 158 of the NPPF states:

"Each local planning authority 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."

The PPG expands on the above, setting out that evidence needs to inform what is in the plan and should also be kept up-to-date. Moreover, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available (and, if necessary, the plan adjusted in the light of this information and the comments received at the publication stage) (PPG: Paragraph 014 Reference ID: 12-014-20140306).

It therefore follows that that a revision to the retail and town centre uses evidence base is required to identify the up to date, objectively assessed retail and leisure needs for Medway. The planned retail and leisure needs should then be included within the Local Plan 2012-2035 along with an appropriate strategy for its phased delivery on sustainable town centre sites over the plan period. It may be that the strategy is not to meet all quantitative need as there is sufficient qualitative provision in town centres, including with redevelopment opportunities, not to have to allocate out of centre sites.

Any revision to the retail evidence base should include an updated household survey. This is required because at present the retail study does not take account of on-going alterations to units and occupier line up at Bluewater. Incremental alterations to this regional shopping centre will have altered its level of turnover and influence on trading patterns. As a result, planning applications for retail development that are accompanied by impact assessment work will underestimate potential impacts on Chatham Town Centre.

Notwithstanding the above, longer term capacity for retail floorspace should also be treated with caution. This is because longer term floorspace requirements can be subject to change due to the innovative nature of the retail sector and associated consumer behaviour. This is reinforced by the Government's response to the CLG Select Committee Inquiry into the Operation of the NPPF (February 2015). The paper recommends that Local Authorities review their Local Plans regularly (in whole or part every five years) to ensure that they are up to date. It must therefore follow that if sites are to be allocated to meet the assessed retail need, these sites should be allocated in accordance with the sequential and impact tests (PPG: Paragraph 006 Reference ID: 2b-006-20140306) and subject to phased delivery in line with plan-led need. Any sites allocated in out of centre locations should be identified as reserve sites that might deliver retail development towards the end of the plan period, subject to regular plan led updates of capacity forecasts maintaining that such a need exists.

This approach would accord with the town centre first requirement of the National Planning Policy Framework (NPPF) along with providing flexibility over the longer term to deliver planned retail needs if 1) plan led need exists; and 2) suitable evidence is provided to demonstrate that the town centre allocations cannot be delivered during the remaining lifetime of the plan. The sequential and impact tests would also remain to be passed.

Local Plans that correctly interpret and include the plan making requirements of the NPPF as set out above give confidence to investors to take forward town centre development projects.

Q26. Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

It is stated at paragraph 10.8 of the consultation document that Chatham currently draws a relatively low proportion of the available expenditure from its local catchment. This scenario has come about as a result of the close proximity of higher order centres such as Bluewater which have a material impact on the ability of Chatham to compete for higher order goods. This highlights the need for Chatham to differentiate its offer by meeting convenience and day to day comparison needs. The Pentagon Centre is well placed to be the focus of such an offer.

Ellandi is supportive of any aspiration which seeks to improve Chatham's market share, however we would note that this is not only to be achieved through a quantitative increase in floorspace but also through qualitative improvements to existing floorspace provision. Sufficient time should be afforded for this to take place.

In advance of identifying an appropriate strategy to address Chatham's low market share it is first necessary to establish an accurate baseline position. This will require the commissioning and preparation of an up to date Retail Study which allows for the assessment of both quantitative capacity and qualitative need for further retailing and leisure uses across the Borough. This will enable the Council to identify a clear strategy as to where and when any further retail and / or leisure development will be accommodated.

In respect of meeting capacity, NPPF paragraph 23 identifies that it is important that needs for retail, leisure, office and other town centre uses are met in full and are not compromised by limited site availability. However, this must be considered within the context of the settlement hierarchy relevant to the Local Plan area (NPPG Paragraph 3) and where within that hierarchy it is most sustainable to meet that need without compromising the vitality and viability of existing town centres. This puts further onus on the Council to assess sub-regional retailing and leisure requirements and how this impacts upon the overarching retail strategy for Medway. Without this there is substantial risk of development being pursued in out of town locations at a scale that is wholly inappropriate for the settlement it is attached to.

Longer range forecasts should be treated with caution and therefore planning to meet needs in full over the lifetime of the plan should be critically assessed against the implications for the vitality and viability of town centres including identifying timescales for when further retail development may be required. The Council should review its retail evidence base in full at the earliest opportunity so that it can devise an appropriate strategy for its phased delivery on sustainable town centre sites or through store efficiency gains over the plan period.

In summary, the Local Plan is the opportunity for objectively assessed development requirements to be tested and spatially planned, which includes identifying appropriate growth for different centres. This must be undertaken with full consideration of each centres role within the retail hierarchy, the market implications of diverting retail growth to alternative centres and the infrastructure requirements that would be required. Without doing this then the plan cannot be effective.

Q27. What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?

The principle of maintaining a focus on A1 retail floorspace within Chatham Town Centre is supported by Ellandi. However, it is stressed that whilst the Council should seek to manage the loss of A1 retail floorspace within the Primary Shopping Area, the wording of any policy should not be overly restrictive and ignore national guidance on the need to adopt a flexible approach to the future role of town centres. This approach is set out by the NPPF at paragraph 23 where it is stated that Local Planning Authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. The NPPF defines suitable 'main town centre uses' as retail, leisure, entertainment facilities, which includes restaurants and bars, and offices. This recognises that retail forms only one part of the experience for visitors to a town centre; it is equally about gaining access to people driven services, eating out, meeting with friends and having an opportunity to socialise. Accordingly, the emerging Local Plan should recognise that customers expect more from their shopping experiences and there is pressure on shopping centre owners, managers and tenants to respond to this.

The NPPF also attaches significant weight to supporting economic growth through the planning system, noting that investment should not be overburdened by the combined requirements of planning policy expectations and that centres should be resilient to anticipated future economic changes. The ability to undertake a balanced consideration of complementary town centre uses at the time they are proposed, where this does not undermine the predominance of A1 retail, is the preferred approach of the NPPF to securing the vitality and viability of town centres.

Bullet 3 of NPPF Paragraph 23 requires Local Plan policy to: *"define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations."* To accord with national policy, the Local Plan should include a plan for each of the designated centres that clearly identifies primary and secondary shopping frontages. A number of recent local plans have failed to grapple sufficiently with this issue causing delays to their adoption. Policy should not be overly prescriptive in terms of setting a specific percentage or number of contiguous non-A1 uses that are permissible. Rather it should look to place the onus on the Applicant to demonstrate how a non-A1 use would secure the vitality and viability of the primary shopping area as a whole and, if the proposal is within the primary shopping frontage, whether the proposal would undermine the overall predominance of A1 retailing.

Q28.Should we consider making provision for a new or replacement supermarket in Gillingham town centre?
If so, where should this go?

Ellandi would support the provision of retail floorspace within Gillingham (or any other centre within the authority) which is appropriate to its scale and role within Medway. Furthermore, any perceived capacity for new convenience or comparison goods floorspace within Medway should respect the settlement hierarchy with Chatham being the focus for substantial Town Centre improvements. Lower order centres should consolidate their role in the hierarchy by providing local convenience and specialist comparison goods.

Q29.What should our approach be to proposals for new or enhanced out of town retail?

The Council should develop policy that supports and enhances the vitality and viability of defined centres within Medway. Accordingly, these should be the preferred location for retail (food and non-food), office, leisure and cultural facilities.

Any alternative to this approach which gives out of centre sites greater status in the hierarchy to increase their sequential preference is contrary to the principles of the NPPF and could not only harm Chatham Town Centre but also the vitality and viability of Medway's network of centres. It is noted at paragraph 10.11 that Hempstead Valley is classified as a District Centre, however it is clear that this functions in a manner more akin to a destination of greater scale and offer. Incremental improvements to this facility have impacted upon higher order centres such as Chatham. For instance Marks and Spencer closed its store in Chatham High Street but is represented at Hempstead Valley. This adverse impact is further heightened by the fact Bluewater being located in close proximity to Chatham. The introduction of new or enhanced out of centre retail floorspace would see Chatham's market share deteriorate further.

In order to accord with the provisions of the NPPF the Council should:

- set out a Town Centre first approach for the location of town centre uses across Medway;
- set out a hierarchy of retail centres, comprising town, district and local retail centres;
- define town centre boundaries, primary shopping areas and secondary shopping streets where applicable;
- set out policy to resist further significant out of town retail development in order to support bringing forward retail led regeneration within Chatham Town Centre;
- set a floor space threshold for when an Impact Assessment is required for edge of and out of centre retail and leisure proposals, reflecting the roles of different centres; and
- seek to ensure that the role of Chatham Town centre as a retail destination is enhanced by directing retail, leisure, tourism and cultural development to the town centre, enabling it to offer a vibrant, vital and distinctive experience.

With respect to the town centres first approach, it is noted that the anticipated timing of the substantial growth in Medway will influence the phasing for when and where the Local Plan seeks to deliver plan led retail need and the preferred strategy for doing this. These considerations will in turn influence how the sequential and impact tests within the NPPF are interpreted and drafted within the new Local Plan. The NPPF requires plan led need to be met in full and therefore the Local Plan must grapple with how to do this in the most sustainable manner that supports the overall vision for Medway. It should be noted that quantitative retail need, whilst an important factor, forms only part of the Council's approach to defining a retail strategy for the Borough.

This is because, as clearly stated in the PPG (Paragraph: 003 Reference ID: 2a-003-20140306) *"the need for all land uses should address both the [...] quantity of economic development floorspace needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment"*. This means that whilst there is an onus on local authorities to understand from a purely quantitative stand point the amount of expenditure capacity that exists across the Plan period (which can be converted into a floorspace requirement), this must be set against a consideration of the qualitative issues.

For example, expenditure calculations may suggest a level of capacity over the Plan period that would require a significant amount of out of centre floorspace to be delivered across the retail hierarchy. However, following a review the qualitative offer of the hierarchy, it may become apparent that a certain market segment (e.g. clothes and footwear) is already well catered for and in fact there is no need to deliver the level of floorspace identified by the quantitative assessment. Or alternatively, there are a high number of vacancies in a certain centre that need to be addressed before expansion is considered.

This would in turn inform a decision to reduce the amount of retail floorspace that is required to be delivered over the Plan period and instead allow authorities to focus on producing effective town centre strategies which seek to address qualitative deficiencies within their areas including tackling addressing vacancies, improving public realm, encouraging new entrants, site assembly for in-centre redevelopment and implementing a place marketing strategy to entice more visitors.

Successfully delivering a town centre first approach will require policies for development management that are adapted to reflect and support local circumstances. The new Local Plan should not simply 'cut and paste' the sequential and impact tests from the NPPF but instead consider when and where need / capacity is likely to arise. This is to avoid the unintended consequences of an applicant seeking to deliver all of the floorspace at the start of the Plan period without supporting retail expenditure being available. It would be beneficial to define what the Council considers to be the appropriate scale and form of development for each of the town and local centres within Medway. This will need to be determined by updated retail assessment work to identify any existing gaps in provision for each of the centres and therefore the scale and type of retailing required to support a sustainable future for the centres. The provision would also then allow capacity figures as informed by qualitative assessment to be set that are relevant to each centre and in turn the phasing requirements for delivering that capacity.

The phasing of capacity will be strongly influenced by housing growth and the location of this growth, therefore policy should ensure that new retailing is generally phased in line with housing growth. This should not restrict town centre sites, as allocated in the Local Plan, from coming forward in advance of plan led capacity being available.

In addition, the Council should undertake an assessment of thresholds to identify a locally set threshold or thresholds over which impact assessment will be required for main town centre uses (office, leisure, retail etc). The NPPF threshold of 2,500 sq m is too high, particularly in areas where town centres are vulnerable and even a small out of centre scheme could have a disproportionate effect on the vitality and viability of the centre. Our experience of the NPPF threshold is that developers of out of centre proposals increasingly size a scheme just under the NPPF threshold on the basis of there not being a unit available within a town centre location that meets all of the operational requirements of an occupier. This then allows them to circumvent the requirement to assess the proposals against the impact test - the NPPF is clear that this is only required over the nationally set threshold or where a locally set threshold, based on robust evidence, is set. We would therefore strongly recommend that research led by Medway Council is undertaken to assess where the current balance of unit sizes lies in each of the Borough's town, district and local centres. A suitable threshold or thresholds can then be set which supports the spatial strategy for the Plan.

Development Strategy

Q86. What approach should be taken to future development opportunities and mix of uses in Chatham Town Centre and Waterfront?

Ellandi fully endorse a strategy which seeks to focus development within Chatham Town Centre and the Waterfront. The Council proposes three options for enhancing the town centre, namely (1) delivering additional residential redevelopment and retail floorspace; (2) delivering additional employment floorspace and residential development to support existing retail floorspace; and (3) maximising additional residential development and allowing for a controlled reduction in retail floorspace.

Q87. Do you agree that the other town centres require improvement in their existing roles, or should we consider holistic review of any of them in conjunction with nearby waterfront regeneration sites?

Ellandi would support the improvement of other town centres within Medway subject to this being appropriate to their scale and role within the hierarchy. Accordingly, this should respect the fact that Chatham is the principal centre within the authority and should be the main focus of new retail floorspace.

A holistic review of the retail and leisure strategy is required as stated throughout this letter.

Summary

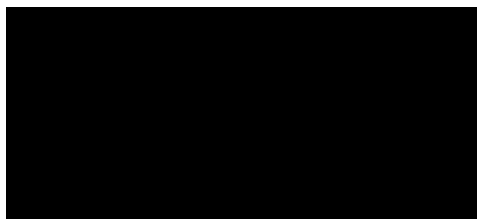
Having reviewed the Medway Local Plan Issues and Options 2012-2035 Ellandi is broadly supportive of the suggestions proposed, but await clarification on the hierarchy of centres, definitions of the role and function of town and district centres and, to that end, specific policies relating to town and district centres.

The council should update the Medway Retail Study to identify quantitative and qualitative retail and leisure needs as informed by a new shopper survey. Work should also be undertaken on developing deliverable town centre strategies that focus on addressing the structural changes of the centres (where these are apparent). The resultant strategies should be included within the emerging plan.

On behalf our client, we request that we are kept up to date on the progress of the Medway Council Local Plan.

We trust that these comments are helpful, and would be happy to discuss any of the issues raised in more detail.

Yours faithfully



Matthew Williams
Director

Enclosure 2

SUPPLEMENTARY REVIEW OF EVIDENCE BASE

As part of our review of the Future Medway Local Plan Consultation, we have undertaken a review of the North Kent SHENA – Retail & Commercial Leisure Assessment November 2016 by GVA Bilfinger (GVA), as this provides the Evidence Base for the retail and town centre draft policies.

In doing so, we have identified a number of issues with the Study and the retail needs assessment provided, which we consider need to be addressed if the resulting policies are to be founded on a robust and transparent evidence base.

The comments below highlight the main matters identified to date but are not exhaustive. They are sufficient however to suggest that not only is further information required from the report authors, but more detailed consideration needs to be given to any outputs used to inform emerging policy and a degree of sensitivity testing applied.

The Household Survey

The household survey is the basis of all the quantitative need analysis in the Study and influences many of the conclusions in terms of the performance of centres. As such it is important that it is undertaken in a robust, transparent and technically correct way.

Having reviewed the household survey in detail it can be seen that:

- 1) The household survey results are presented as 'weighted' results with SFT excluded. Although not specified, it is apparent that the results also exclude the 'don't do' responses, although the extent of these can be calculated from the main shopping question and the following one relating to which online provider has been used.
- 2) Overall, 1,501 interviews were undertaken across 15 survey zones. Of these, 7 zones covered the Medway Council area, 4 covered Gravesham and 4 zones covered areas outside both authorities but where residents are likely to look to one or more of the centres or retail outlets in the Councils' area. This is not a particularly large sample for a study of this type, and results from some zones (e.g. Zones 13 and 14) are particularly highly weighted. Whilst we note that the 'standard' sample size of 100 responses per zone has been met, we would suggest that further consideration is given to the reliability of the results and the extent to which such weightings may unduly influence key findings or forecasts.
- 3) In addition we note that these limited sample sizes does result in some very small samples for responses that do not apply to 100% of the respondents. This is especially noticeable for the questions relating to the leisure uses (Q21 onwards) where samples in individual zones are often as low as 20-30. However, more importantly for the retail need assessment, this low response rate is also an issue for some of the non-food responses, such as furniture/floor coverings and household textiles (Q07); domestic appliances (Q09) and recreational and luxury goods (Q12). This will affect the reliability of the overall comparison draw (dependent on way total comparison spend and trade draw is calculated).
- 4) With a limited sample size, it is also important that the zones have been defined in a way that means they are relatively homogeneous. Having reviewed the 15 zones it would seem that:
 - Population levels in some of the zones are very high and the proportion of surveyed households is correspondingly low. Although the results are

subsequently weighted to reflect the different populations, this is still a concern, particularly in Medway's Zones 12,13 and 14:

Zone	Name	2015 Population	Survey Sample (unweighted)	% Population sampled
1	Dartford East	44,411	100	0.2%
2	Swanscombe	20,459	100	0.5%
3	Southfleet	15,877	100	0.6%
4	North-East of Sevenoaks	32,440	100	0.3%
5	Gravesend	86,337	104	0.1%
6	East of Gravesend	9,121	100	1.1%
7	North Medway	21,559	100	0.5%
8	Meopham	9,218	94	1.0%
9	Strood	35,498	100	0.3%
10	South Medway	28,070	100	0.4%
11	Rochester	31,561	101	0.3%
12	Chatham & Gillingham	40,076	100	0.2%
13	Walderslade	67,315	100	0.1%
14	East Medway	72,004	97	0.1%
15	West of Sittingbourne	13,771	105	0.8%
	Total	527,717	1501	0.3%

Notes:
 Zonal information from Table 1A Appendix 2
 2015 Population from Table 1 Appendix 2
 Sample size from Household Survey Results Volume 3

- 5) The responses to the demographic questions suggest that there may be an issue with regard to whether the resulting samples are representative of the survey zones. This can only really be confirmed by running the necessary demographic profiles by zone. However, it would appear that the number of retired respondents may be over-

represented in the Medway area. A 2011 Census report¹ indicated that over 65's are highest in Rainham Central ward at 21.3% (part of Zone 14) and lowest in River ward at 8% (covered by Zones 11 and 12). However, in the household survey the proportion of respondents aged 65+ is high in all three zones at over 30%, which itself is above the average for the survey overall (21.6%).

- 6) Existing market shares for convenience are based on two questions for main food shopping and one for top-up shopping, with only single responses allowed for each. Further, the survey results suggest only two-thirds of respondents undertake ANY top up shopping (971 of 1501 respondents to Q04). Not only does this seem unlikely, but it means the responses by zone are low in the Medway area, with just 54 responses in Zone 14 rising to 76 in Zone 11. This means the top-up element of the convenience spend/market share needs to be treated with caution. It may be that this element of convenience spend is underestimated, which in turn would affect the derived market shares.
- 7) The questions for comparison shopping present a different issue, with the locations not adequately defined. In particular, responses have only been recorded to the town location in some cases. For places such as Bluewater this does not present any particular issues as the location is clear, however this is not the case for the Medway towns. A response of 'Chatham' does not necessarily mean the town centre, although this is what the survey analysis assumes. As a result the market share of Chatham Town Centre and the other towns in the area is likely to be overstated, potentially to a significant extent.

This is partially acknowledged in para 4.10 of the GVA study where they suggest there is confusion by respondents in relation to Gillingham. However, it is clear that the problem applies equally to Chatham, Strood etc.

- 8) The types of goods asked about in relation to comparison spend are categorized relatively generally as set out below:

Survey Question Number	Types of Goods
5 & 6	Clothes, Footwear and other Fashion Goods
7	Furniture, Floor Coverings and Household Textiles
8	DIY and Decorating Goods
9	Domestic Appliances such as Washing Machines, Fridges, Cookers and Kettles
10	TV, Hi-Fi, Radio, Photographic and Computer Equipment
11	Personal Care such as Soaps, Beauty Products, Medical Goods
12	Recreational and Luxury Goods including Books, Games, Sports, Pets and Pet Products, Bicycles, Jewellery

¹ Medway 2011 Census Report

- 9) A second ('other') question is only asked in relation to Q05 – Clothes, Footwear and Other Fashion Goods. In all other cases, the analysis relies on a single location for all types of goods in that category, which is clearly unrealistic for some of the categories.
- 10) This is a particular issue with respect to Q12, as despite the considerable range of goods coming under this 'other' category less than half of respondents gave a physical location for undertaking this form of shopping (704 of 1,501), with the response in Medway Zones as low as 40 (Zone 14). A further 20% of respondents indicated they undertook this form of shopping online (Q12A). However, this highlights the problem of seeking to cover such a broad category of goods in a single question, as the purchase of jewellery for instance is extremely unlikely to be undertaken online.
- 11) The commercial leisure responses are also unreliable as they force respondents to indicate a 'town centre' location for an activity. They are also limited to a single response. There is therefore no allowance made for the use of local cafes, restaurants or public houses etc. Similarly Q28 asks about the use of health and fitness clubs, which may omit local groups in community halls etc.

Retail Need Assessment – The Methodology

In terms of the methodology used by GVA to estimate future floorspace requirements for the Medway area, it is clear that this is based on the household survey results, but there is a lack of information about the methodology used:

- 1) There is no information provided as to how GVA have weighted the household survey results to get the overall market shares:
 - For convenience it is stated that 70% main: 30% top-up is assumed (Para 6.6) but there is no information on how Q1 and Q3 have been weighted (Main and Other Main).
 - For comparison, there is no information on the weighting between the first and second choices for clothing purchases (Q5 & Q6), or for clothing spend relative to the other non-food categories, although it is suggested it is based on available spend (Para 6.8). However, the 7 comparison categories covered by the survey, do not correspond exactly to the COICOPs spending categories. This, combined with the reliance on most cases on a single destination response and the relatively high number of non-responses, means it is impossible to be sure the market shares are robust.
- 2) The commitments allowed for in the need assessment are incomplete / already out of date. This has the potential to both affect the estimated turnover of the centres and the proportion of trade that is assumed to be retained in the study area.

Omissions include the recently approved extension at Hempstead Valley and the new retail unit at the Horsted Retail Park. Also the analysis does not make any allowance for commitments outside of the Medway area (Table 7b) even though trade leakage from the area is significant (Table 4.1) and the draw of Bluewater, Lakeside, Maidstone etc is recognised. Only part of the proposed retail offer at Ebbsfleet is also allowed for (Para 4.22).

- 3) The base scenario relies on Experian population forecasts but with 4 other scenarios tested. These all seem to rely on work by Gravesham Council and it is not known if Medway agree with the assumptions. However, what is clear is that the alternative

scenarios all result in very significant population uplifts and thus will only be reliable if these assumptions are also reliable.

- 4) The expenditure growth figures used by GVA are now out-of-date (Table 6.1) and appear to be optimistic compared with what is assumed now for convenience expenditure but are low for comparison spend.
- 5) The allowance for sales efficiency (Para 6.19) seems to be exceptionally cautious given that many retailers would have traded at considerably higher densities prior to the recession. There is no justification for the 50% of growth that is assumed, and must be considered in some ways, a self-fulfilling prophecy. If no new floorspace were allowed, then all the increased spend would go to existing outlets and online, and sales efficiencies would increase accordingly. It also follows that there is greater potential to improve sales efficiencies in locations such as Chatham town centre, where current sales densities are low (Table 8.1).
- 6) Linked to this, it is not immediately clear why the sales per sqm for convenience decreases so substantially between 2015 and 2020 (Table 8b). This needs to be looked at further, but suggests convenience floorspace needs may be overstated.
- 7) There appears to be a slight mathematical error in Table 8b in relation to inflow expenditure. This is stated as being 5% and is assumed to relate to 5% of residents' total spend in Medway. However, 5% of £601.3m (2015 - £430 + £171.3m) is £30.1m not £31.6m as stated, suggesting capacity is overstated by £1.5m. By 2028 this increases to £2.6m (£49.4m inflow rather than £52m) and to £3.7m by 2037 (£71.1m compared to the stated £74.8m). This not a huge difference but would decrease GVA's estimate of comparison floorspace requirements by 452 sqm by 2037.

Enclosure 3

Medway Retail Study - Williams Gallagher Analysis
Alternative Comparison Analysis

Base Option - GVA Table 8b	Comparison Goods					
	2015	2020	2025	2028	2031	2037
Total Available Expenditure in North Kent SHENA Area (£m)	1569.1	1863.7	2284.2	2583.4	2920.1	3721.1
Survey Area Residents Spending (town & district centres) (£m)*	430.0	510.2	624.6	706.3	798.1	1016.6
Survey Area Residents Spending (retail parks / foodstores) (£m) *	171.3	203.2	248.7	281.1	317.7	404.5
Inflow of Expenditure (5%) (as stated by GVA)*	31.6	37.5	46.0	52.0	58.7	74.8
TOTAL SPENDING (£m)	632.90	750.90	919.30	1039.40	1174.50	1495.90
Existing Retail Floorspace (sqm net)	111,734	111,734	111,734	111,734	111,734	111,734
Sales per sqm net (£)	5,665	6,148	6,672	7,008	7,361	8,120
Sales from Existing Floorspace (£m)	632.97	686.95	745.52	783.04	822.44	907.29
Sales from Commitments (£m)	0	66.7	72.39	76.03	79.86	88.10
Residual Spending to Support New Floorspace (£m)	0	-2.75	101.39	180.33	272.21	500.51
Sales per sq m in new shops (£)	6,000	6,512	7,067	7,422	7,422	8,188
Capacity for new floorspace (sq m net)	0	-422	14,348	24,296	36,676	61,129

Notes

* All assumed constant over time - ie no change in leakage from area or inflow

GVA Table 8b - Adjusted for Experian ERP14	Comparison Goods					
	2015	2020	2025	2028	2031	2037
Total Available Expenditure in North Kent SHENA Area (£m)	1569.1	1863.7	2284.2	2583.4	2920.1	3721.1
Survey Area Residents Spending (town & district centres) (£m)*	430.0	510.2	624.6	706.3	798.1	1016.6
Survey Area Residents Spending (retail parks / foodstores) (£m) *	171.3	203.2	248.7	281.1	317.7	404.5
Inflow of Expenditure (5%) (as stated by GVA)*	31.6	37.5	46.0	52.0	58.7	74.8
TOTAL SPENDING (£m)	632.90	750.90	919.30	1039.40	1174.50	1495.90
Existing Retail Floorspace (sqm net)	111,734	111,734	111,734	111,734	111,734	111,734
Sales per sqm net (£)	5,665	6,242	6,980	7,451	7,953	9,063
Sales from Existing Floorspace (£m)	632.97	697.42	779.87	832.48	888.65	1012.59
Sales from Commitments (£m)	0	66.7	74.59	79.62	84.99	96.84
Residual Spending to Support New Floorspace (£m)	0	-13.22	64.84	127.30	200.87	386.47
Sales per sq m in new shops (£)	6,000	6,611	7,392	7,891	7,891	8,992
Capacity for new floorspace (sq m net)	0	-2,000	8,771	16,132	25,455	42,981

Notes

* All assumed constant over time - ie no change in leakage from area or inflow

Replaces assumed 1.65% sales efficiency with ERPBN 14 estimates of sales density growth rates (2015 =+5.3%, 2016=+2.7%; 2017=+1.5%; 2018=+1.0%; 2019-23=+2.3%; 2024-2035=+2.2%. Beyond 2035 assumed +2.2%)

GVA Table 8b - Adjusted for Experian ERP15	Comparison Goods					
	2015	2020	2025	2028	2031	2037
Total Available Expenditure in North Kent SHENA Area (£m)	1569.1	1863.7	2284.2	2583.4	2920.1	3721.1
Survey Area Residents Spending (town & district centres) (£m)*	430.0	510.2	624.6	706.3	798.1	1016.6
Survey Area Residents Spending (retail parks / foodstores) (£m) *	171.3	203.2	248.7	281.1	317.7	404.5
Inflow of Expenditure (5%) (as stated by GVA)*	31.6	37.5	46.0	52.0	58.7	74.8
TOTAL SPENDING (£m)	632.90	750.90	919.30	1039.40	1174.50	1495.90
Existing Retail Floorspace (sqm net)	111,734	111,734	111,734	111,734	111,734	111,734
Sales per sqm net (£)	5,665	6,289	7,040	7,515	8,022	9,141
Sales from Existing Floorspace (£m)	632.97	702.74	786.59	839.65	896.30	1021.31
Sales from Commitments (£m)	0	66.7	74.66	79.70	85.07	96.94
Residual Spending to Support New Floorspace (£m)	0	-18.54	58.05	120.05	193.13	377.65
Sales per sq m in new shops (£)	6,000	6,661	7,456	7,959	7,959	9,069
Capacity for new floorspace (sq m net)	0	-2,783	7,786	15,084	24,266	41,642

Notes

* All assumed constant over time - ie no change in leakage from area or inflow

Replaces assumed 1.65% sales efficiency with ERPBN 15 estimates of sales density growth rates (2016=+4.3%; 2017=+1.3%; 2018=+0.9%; 2019=1.8%; 2020-24=+2.3%; 2025-2036=+2.2%. 2037 assumed +2.2%)

Base Option - GVA Table 8b CORRECTED	Comparison Goods					
	2015	2020	2025	2028	2031	2037
Total Available Expenditure in North Kent SHENA Area (£m)	1569.1	1863.7	2284.2	2583.4	2920.1	3721.1
Survey Area Residents Spending (town & district centres) (£m)*	430.0	510.2	624.6	706.3	798.1	1016.6
Survey Area Residents Spending (retail parks / foodstores) (£m) *	171.3	203.2	248.7	281.1	317.7	404.5
Inflow of Expenditure (5%)*	30.1	35.7	43.7	49.4	55.8	71.1
TOTAL SPENDING (£m)	631.37	749.07	916.97	1036.77	1171.59	1492.16
Existing Retail Floorspace (sqm net)	111,734	111,734	111,734	111,734	111,734	111,734
Sales per sqm net (£)	5,665	6,148	6,672	7,008	7,361	8,120
Sales from Existing Floorspace (£m)	632.97	686.95	745.52	783.04	822.44	907.29
Sales from Commitments (£m)	0	66.7	72.39	76.03	79.86	88.10
Residual Spending to Support New Floorspace (£m)	0	-4.58	99.06	177.70	269.30	496.77
Sales per sq m in new shops (£)	6,000	6,512	7,067	7,422	7,796	8,600
Capacity for new floorspace (sq m net)	0	-703	14,017	23,942	34,543	57,762

Notes

* All assumed constant over time - ie no change in leakage from area or inflow

GVA Table 8b - Adjusted for Experian ERP14 (CORRECTED BASE)	Comparison Goods					
	2015	2020	2025	2028	2031	2037
Total Available Expenditure in North Kent SHENA Area (£m)	1569.1	1863.7	2284.2	2583.4	2920.1	3721.1
Survey Area Residents Spending (town & district centres) (£m)*	430.0	510.2	624.6	706.3	798.1	1016.6
Survey Area Residents Spending (retail parks / foodstores) (£m) *	171.3	203.2	248.7	281.1	317.7	404.5
Inflow of Expenditure (5%)*	30.1	35.7	43.7	49.4	55.8	71.1
TOTAL SPENDING (£m)	631.37	749.07	916.97	1036.77	1171.59	1492.16
Existing Retail Floorspace (sqm net)	111,734	111,734	111,734	111,734	111,734	111,734
Sales per sqm net (£)	5,665	6,242	6,980	7,451	7,953	9,063
Sales from Existing Floorspace (£m)	632.97	697.42	779.87	832.48	888.65	1012.59
Sales from Commitments (£m)	0	66.7	74.59	79.62	84.99	96.84
Residual Spending to Support New Floorspace (£m)	0	-15.05	62.51	124.67	197.96	382.72
Sales per sq m in new shops (£)	6,000	6,611	7,392	7,891	8,424	9,598
Capacity for new floorspace (sq m net)	0	-2,277	8,456	15,799	23,500	39,873

Notes

* All assumed constant over time - ie no change in leakage from area or inflow

Replaces assumed 1.65% sales efficiency with ERPBN 14 estimates of sales density growth rates (2015 =+5.3%, 2016=+2.7%; 2017=+1.5%; 2018=+1.0%; 2019-23=+2.3%; 2024-2035=+2.2%. Beyond 2035 assumed +2.2%)

GVA Table 8b - Adjusted for Experian ERP15 (CORRECTED BASE)	Comparison Goods					
	2015	2020	2025	2028	2031	2037
Total Available Expenditure in North Kent SHENA Area (£m)	1569.1	1863.7	2284.2	2583.4	2920.1	3721.1
Survey Area Residents Spending (town & district centres) (£m)*	430.0	510.2	624.6	706.3	798.1	1016.6
Survey Area Residents Spending (retail parks / foodstores) (£m) *	171.3	203.2	248.7	281.1	317.7	404.5
Inflow of Expenditure (5%)*	30.1	35.7	43.7	49.4	55.8	71.1
TOTAL SPENDING (£m)	631.37	749.07	916.97	1036.77	1171.59	1492.16
Existing Retail Floorspace (sqm net)	111,734	111,734	111,734	111,734	111,734	111,734
Sales per sqm net (£)	5,665	6,289	7,040	7,515	8,022	9,141
Sales from Existing Floorspace (£m)	632.97	702.74	786.59	839.65	896.30	1021.31
Sales from Commitments (£m)	0	66.7	74.66	79.70	85.07	96.94
Residual Spending to Support New Floorspace (£m)	0	-20.37	55.72	117.42	190.22	373.91
Sales per sq m in new shops (£)	6,000	6,661	7,456	7,959	8,496	9,681
Capacity for new floorspace (sq m net)	0	-3,058	7,473	14,753	22,389	38,622

Notes

* All assumed constant over time - ie no change in leakage from area or inflow

Replaces assumed 1.65% sales efficiency with ERPBN 15 estimates of sales density growth rates (2016=+4.3%; 2017=+1.3%; 2018=+0.9%; 2019=1.8%; 2020-24=+2.3%; 2025-2036=+2.2%. 2037 assumed +2.2%)

maryott, kyle

From: [REDACTED]
Sent: 25 June 2018 15:08
To: futuremedway
Cc: [REDACTED]
Subject: Medway Local Plan

Categories: Blue Category



Dear Sirs

I am a local resident living in Hoo St Werburgh and I am writing to fiercely object to the current proposals for yet further development on the Hoo Peninsular.

My personal concerns are as follows:-

1. To my knowledge there are only 2 doctors surgeries in Hoo and they are both bursting to capacity. I tried to get a doctors appointment recently and I was told that there were no appointments. As I merely needed a referral for the purposes of my private healthcare plan, I explained that I would accept an appointment at any date/time, it wasn't urgent and it didn't matter if it was in a few weeks time. The response was to call back in 6 weeks, we are fully booked up for 6 weeks and we do not book appointments beyond 6 weeks. I queried what the position would be if I called in 6 weeks and they were still fully booked. The response was, then you will have to call back in another 6 weeks. This causes me grave concern. If the doctors surgeries are too busy to book a standard referral appointment now, it would be catastrophic to build more homes without the necessary healthcare support the community desperately needs at this stage
2. I work in London and I drive to work via the A2 every day. Not only is there only 1 main road out of Hoo (the Ratcliffe Highway) at the moment but there is then only 1 main road into London from there. My journey to the M25 junction usually takes anywhere between 1 – 2 hours, which is ridiculous considering it should take approximately 30 minutes. The A2 is a capacity motorway which means it is not equipped to handle any more traffic than it already does. Extreme measures will need to be taken to relieve the volume of traffic long before further housing is built. You will of course already be aware of the huge developments in Hoo and Ebbsfleet that are already going to have a negative impact on the A2 flow of traffic

Yours sincerely
Wendy Gudgeon LL.B
Senior Conveyancer

Barnes and Partners Solicitors
90 Silver Street
Enfield EN1 3EP



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C.Smee, C.Sheridan, J.Peters and R.Dawson

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24 June 2018

Planning Department
LOCAL PLAN FEEDBACK
Medway Council
Gun Wharf
Chatham
Kent

Dear Sirs

Local Plan – Comments from a High Halstow resident

I am hoping that these comments will go in the feedback for the proposed Local Plan.

I am concerned that the Council have only considered the peninsula. This does not make sense to me. The peninsula already has a huge problem with traffic at prime times and surely this should have been considered. I know that many residents on the peninsula feel the same way but this appears to be falling on deaf ears.

I moved to High Halstow as I wanted a more rural lifestyle. I am happy not to have a supermarket in the vicinity as I would prefer the quiet. If our village is doubled in size then this peace will be shattered. Surely we have a right to keep our community in a manner we want it.

Personally, I believe there should be more housing for younger couples – but not over 700! There should be housing to allow those couples living with parents to be able to purchase a home of their own – NOT part buy – but as we did as a young couple. If we build 2/3 bedroomed houses that fit into the village then these can be purchased by locals. The older generation could move out of the larger houses if we built bungalows for the elderly. We, as locals, have put forward many suggestions and we feel we should be listened to.

The actual land itself is unsuitable for building. I have this discussed this issue at length with an expert in the field. If you ignore this fact that you will be responsible for unsuitable housing that potential purchasers will be left with. It seems to me that you are not taking any of this into consideration and all that you are interested in are listening to the figures insisted from Government. You, as a Council, have Councillors who were voted in to look after our villages and towns and as far as I can see you just want the lazy way out and are hell bent on destroying the peninsula.

If we HAVE to have housing on the peninsula then I am concerned that you have not even considered the Isle of Grain where there is much land that could be utilised. There is also Kingsnorth. I have raised this issue but have been told that this is not appropriate for building yet I wait with baited breath to hear that you WILL build once you have ruined Hoo and High Halstow.

You have already taken the horrendous decision of closing Deangate Ridge Golf Course which will have a catastrophic effect on our community as it is.

I don't for one minute think that this letter will be taken seriously. I hope it is. I am passionate about my village and equally passionate about the peninsula. I chose to live here. I really don't want it ruined by too many unnecessary and inappropriate development of houses.

Please think again.

Yours faithfully

Online Signature

Linda Atkinson

Resident and Parish Councillor for High Halstow

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



June 2018

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EXECUTIVE SUMMARY

Context

- i. Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Development's representation to the Medway Local Plan Development Strategy consultation.
- ii. Gladman have been actively involved in the previous round of consultation into the draft Local Plan and look forward to continuing to work positively with the Council to aid the development of a sound plan.

Policy Options

- iii. The representation contains our views on a wide range of issues which are discussed within the consultation document. The representation builds upon the comments we made at the Issues and Options and Development Options stages of consultation, but with a focus on the various development options discussed in the development scenario sections of the document.
- iv. We also consider the proposed strategies for meeting the housing need within Medway, and some of the policy areas which are beginning to emerge. Given our interests our comments largely relate to how the plan can help Medway meets its housing needs.

1 INTRODUCTION

1.1 Context

- 1.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Developments' representations on the Medway Local Plan Development Strategy Regulation 18 consultation.
- 1.1.2 Through this submission Gladman will highlight a number of areas of support for the Councils proposed approach as well as highlighting some areas where further work is required, in order to allow the Council to prepare a sound plan. Given the nature of our interest our comments relate largely to the housing requirement of the Local Plan and how the Council will go about meeting this housing requirement.
- 1.1.3 This representation should be read alongside that submitted by Barton Willmore on behalf of the consortium of developers looking at the Hoo Rural Town proposals. The submissions of Barton Willmore will focus on that aspect of the plan, this representation will touch on the development at Hoo but also consider the wider principles.
- 1.1.4 Even at this early stage of the plan making process it is imperative that the document is setting the foundations to meet the National Planning Policy Frameworks (NPPF) four tests for Local Plans to be considered sound:
- **Positively Prepared**
 - **Justified**
 - **Effective**
 - **Consistent with National Policy**

2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework and Planning Practice Guidance

2.1.1 The National Planning Policy Framework has been with us now for over four years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. The Framework sets out the Government's goal to 'significantly boost the supply of housing' and how this should be reflected through the preparation of Local Plans. In this regard it sets out specific guidance that local planning authorities must take into account when identifying and meeting their objectively assessed housing needs:

"To boost significantly the supply of housing, local planning 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***
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements..."***
- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15" (Paragraph 47)"***

2.1.2 The starting point of identifying objectively assessed housing needs is set out in paragraph 159 of the NPPF, which requires local planning authorities to prepare a Strategic Housing Market Assessment, working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects of the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (paragraph 158).

2.1.3 Once a local authority has identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (paragraph 14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (paragraph 152).

2.1.4 As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on the 6th March 2014, clarifying how specific elements of the Framework should be

interpreted when preparing their Local Plans. The PPG on the Housing and Economic Development Needs in particular provides a clear indication of how the Government expects the Framework to be taken into account when Councils are identifying their objectively assessed housing needs. Key points from this document include:

- Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need
- Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.
- Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.
- Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.
- Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.
- The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.
- The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.

2.2 The White Paper, Autumn Budget and Draft NPPF

- 2.2.1 The Government White Paper ('Fixing our Broken Housing Market') issued in February 2017 is a very clear statement from Government on the importance of the delivery of housing to the wider economy.
- 2.2.2 The Government are in no doubt that the housing market in Britain is broken, which according to the Prime Minister, is one of the greatest barriers to progress in the country today.

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- 2.2.3 Average house costs are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right place has slammed the door of the housing market in the face of a whole generation.
- 2.2.4 The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that the housing shortage isn't a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.
- 2.2.5 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haves and have nots.
- 2.2.6 The challenge of increasing supply cannot be met by government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.
- 2.2.7 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.
- 2.2.8 Currently, over 40 percent of local planning authorities do not have a plan that meets the projected growth in households in their area. All local authorities should therefore develop an up-to-date plan with their communities that meets their housing requirement based upon an honest assessment of the need for new homes.
- 2.2.9 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, even though not every area may be able to do so in full. The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the National Planning Policy Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the benefits. Where an authority has demonstrated that it is unable to meet all of its housing requirement, it must be able to work constructively with neighbouring authorities to ensure that the remainder is met.
- 2.2.10 Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every five years. An authority will also need to update their plan if their existing housing target can no longer be justified against their objectively assessed housing requirement.
- 2.2.11 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.
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- 2.2.12 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up. It is clear that improving the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.
- 2.2.13 Finally, the Government have made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.
- 2.2.14 The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of homes in the right places. The Local Plan therefore needs to consider these policy intentions now in order to ensure that it fulfils the Governments agenda and provides the homes that its local community need.
- 2.2.15 Following the election, Sajid Javid re-iterated the Government's intentions for boosting housing growth stating that he wants areas that have benefitted from soaring property prices to play their role in solving the housing crisis. Mr Javid pointed out that where property prices were particularly unaffordable, local leaders would need to take a long hard and honest look to see if they were planning for the right number of homes.
- 2.2.16 More recently, in October 2017, the Prime Minister reaffirmed the Government's commitment to addressing the broken housing market by bringing forward measures to boost home ownership and housing supply, stating:
- "I will dedicate my premiership to fixing the problem – to restoring hope. To renewing the British Dream for a new generation of people. And that means fixing our broken housing market."*
- "For 30 or 40 years we simply haven't built enough homes. As a result, prices have risen so much that the average home now costs almost 8 times average earnings. And that's been a disaster for young people in particular."*
- 2.2.17 Furthermore, in a message to housebuilders, the Prime Minister indicated that:
- "We, the government, will make sure the land is available. We'll make sure our young people have the skills you need. In return, you must do your duty to Britain and build the homes our country needs."*
- 2.2.18 The Autumn Budget 2017 brought further details of the Government's commitment to building a Britain that is 'fit for the future.' A prominent feature of this is tackling the housing crisis, with

housebuilding featuring prominently amongst the Chancellor's announcements, which included further confirmation that:

"The Government is determined to fix the broken housing market, and restore the dream of home ownership for a new generation."

- 2.2.19 The affordability of housing for young people is a key challenge for the Government, and whilst it is recognised that there is no 'single magic bullet' to solve the housing crisis, the Government is actively seeking to tackle obstacles standing in the way of first time buyers. The Government sees a 'big step up' in new house building as an important element in its strategy to address the acute affordability problem and has set a goal to build 300,000 homes a year by the mid-2020s.
- 2.2.20 The vital importance of housing to the economic success of our cities and regions is also highlighted in the Government White Paper "Industrial Strategy: Building a Britain Fit for the Future", which was published in November 2017. This includes reference to the introduction of planning reforms that will ensure more land is available for housing, and that better use is made of underused land in our cities and towns. It also sets out the challenge to raise housing supply to 300,000 per year before the end of the current parliament. The Government wants to support greater collaboration between councils, a more strategic approach to the planning of housing and infrastructure, more innovative and high quality design in new homes and the creation of the right conditions for new private investment.
- 2.2.21 Draft revisions to the Framework were published on 5 March 2018 for public consultation. Whilst only limited weight can be attached to the provisions included within the consultation proposals, it represents a very clear statement by the Government of the need to seriously tackle the housing shortage that the country faces and the need to deliver 300,000 new homes per year, with the Bristol Local Plan Review is very likely to be examined against the revised Framework, the Council should, where possible, ensure the plan is as flexible as possible so that it remains as up-to-date as it can, once the revised Framework is adopted.

3 LEGAL COMPLIANCE

3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 3.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration¹, as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard the Medway Local Plan must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 3.1.3 Medway sits in close proximity to a number of adjoining authorities within the south east, all of which are under significant pressure to deliver housing. Medway must ensure that ongoing and effective cooperation is undertaken with all districts. It is essential that these relationships are explored through the Duty to Cooperate and that any discussions are meaningful and lead to real outcomes in addressing the strategic issues identified.
- 3.1.4 One particularly important issue which Medway will need to factor into its ongoing Duty to Cooperate discussions will be consideration of the unmet housing needs of London, and as such cooperation and discussion with the Mayor of London. The Mayor is a prescribed body under the PPG² and as such will be an important consultee as the plan moves forward. Given that the levels of unmet need in London are currently at least 6,600 per annum³ and could in reality be as high as 13,000 per annum, it is inevitable that some surrounding districts within the south east will be called upon to take pressure and housing growth from London. Given the strong links, identified by the Council, and the presence of key infrastructure, such as HS1, Medway could be a key location for accommodating such growth, and the plan through the Duty to Cooperate will need to explore these issues with the Mayor of London.

¹ PPG Reference ID. 9-011-2014036

² PPG Reference ID. 9-005-20150402

³ Para 31 – Report on the examination in public into the further alterations to the London Plan

- 3.1.5 Further the PPG reflects on the public bodies which are subject to the duty to cooperate. It contains a list of the prescribed bodies. The PPG then goes on to state that:

“These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters.”

- 3.1.6 Medway will need to discuss with its neighbours the implications for the Standard Methodology for housing, which will likely be brought into effect in autumn 2018. The current figures show that when the Standard Methodology comes in there will be a significant increase in the housing needs of a number of authorities in Kent.

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.
- 3.2.2 An SA has been published for consideration during the period of consultation on the Development Strategy document. As noted above SA is an iterative process which should inform plan making and the delivery of development options. Gladman note the content of the SA at this time, commentary relating to the overall development options is contained within the Barton Willmore representation on behalf of the consortium.
- 3.2.3 Gladman consider there will be a need for the SA to look at potential site development options for the next iteration of the plan. These assessments alongside those undertaken through the SLAA should be used to inform additional site allocations required in the plan.

4 OBJECTIVELY ASSESSED HOUSING NEED

4.1 Background

4.1.1 The process of undertaking an OAN is clearly set out in the Framework principally in §14, §47, §152 and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.

4.1.2 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying

“the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- ***Meets household and population projections taking account of migration and demographic change;***
- ***Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and***
- ***Caters for housing demand and the scale of housing supply necessary to meet this demand.”***

4.1.3 Key points that are worth noting from the above is that the objective assessment should identify the full need for housing **before** the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.

4.1.4 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in *Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes*

Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:

“The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. [...] The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies”.

4.1.5 Therefore following the exercise to identify the full, OAN for housing in an area,

“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)

4.1.6 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.

4.1.7 The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above,

“Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:

- **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or**
- **specific policies in this Framework indicate development should be restricted.”**

- 4.1.8 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:

“sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”.

- 4.1.9 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.
- 4.1.10 The National Planning Practice Guidance (NPPG) contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.

4.2 Standard Methodology

- 4.2.1 The commentary above is given in the context that the Council is seeking still to promote a housing requirement based on an OAN derived from its SHMA. Gladman will discuss this approach further in Section 5 of this representation, however in short we consider this approach to be unsound. The government consulted upon a draft revised NPPF and PPG in spring 2018, it is expected that a revised NPPF will be released in July 2018. The revised documents both continue to propose the use of the Standard Methodology for assessing housing needs. Whilst there is potential for some small changes to be made to the methodology for doing so, it seems unlikely that these will be significant. Upon adoption the Standard Methodology will be the default mechanism for assessing housing need, only in exception circumstances will a local authority be able to depart from it.

5 MEDWAY DEVELOPMENT STRATEGY

5.1 **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?**

OAN and Housing Requirement

- 5.1.1 Gladman consider there are two key strands to consider in responding to the question. Firstly what should the OAN and housing requirement for the plan be, and secondly what is the best way in dealing with the development needs arising.
- 5.1.2 With regard the OAN Gladman consider that the Council must use the Standard Methodology (when finalised) to identify its housing requirement. Whilst the methodology remains draft at the present time it seems unlikely that it will be changed significantly when it arrives in its final form in July, the government has also been clear about the transitional arrangements for its use in plan making. Given the timing of the Regulation 19 version of the Medway Local Plan it is imperative, for the development of a sound plan, that the Council start now to plan for the level of housing indicated through the Standard Methodology. The Council will not know until the release of the new household projections from ONS what this figure will be, but planning for a figure of circa 1,665 homes a year seems prudent.
- 5.1.3 It is noted that only one of the development scenarios takes account of this figure, Gladman are therefore concerned that Medway is not giving due consideration to the need to meet this figure. The Standard Methodology figure must be used as the starting point for calculating Medway's housing needs, failing to do so would likely lead to the plan being found unsound at examination.
- 5.1.4 Gladman are cognisant of the fact that the draft NPPF does state that in 'exceptional circumstances' local authorities may depart from the Standard Methodology. However, the Council must be careful in using such an argument in calculating its housing needs, firstly the test should not be applied in account of any perceived difficulties in delivering the housing number or due to constraints, be they infrastructure or environment related. The 'exceptional circumstance' would relate to any potential flaw or problem with the data which underpins the household projections, Gladman have not noted any such flaw in previous work undertaken in Medway.
- 5.1.5 The Council in paragraph 3.9 of the consultation document therefore seem to be conflicting calculating OAN with deriving a housing requirement. The issues raised in that paragraph should not stop the Council in using the Standard Methodology to identify its OAN, these are issues which may influence the housing requirement derived for Medway. This is an important distinction because if this were a case to be taken forward my Medway the Council would need to ensure that neighbouring authorities pick up any unmet housing needs through the Duty to Cooperate. For the

record Gladman consider that there is no evidence to demonstrate that the OAN identified through the Standard Methodology cannot be delivered in Medway.

- 5.1.6 Whatever option is taken forward therefore it must be one which seeks to meet the OAN identified through the use of the Standard Methodology.

Development Options

- 5.1.7 Gladman are largely supportive of the Council's aspirations to seek significant growth on the Hoo peninsula. As previously referenced this representation should be read in accordance with that submitted by Barton Willmore on behalf of the consortium investing in the Hoo Rural Town.
- 5.1.8 Given the scale of growth required to meet Medway's needs it will be important that the final strategy takes elements from the range of development scenarios presented. Clearly it will be important to maximise the potential of brownfield land, however acknowledgement will need to be given as to what this can achieve, the type of housing product it will provide and the viability of doing so. Brownfield regeneration will be one part of the overall jigsaw in meeting plan need. As discussed above Gladman are pleased to note the inclusion of the Hoo Rural Town in all development options, significant work has been done, and continues to be done in ensuring the development proposals for Hoo are both deliverable and make a positive contribution to the Hoo peninsula.
- 5.1.9 Gladman, as part of the consortium, continue to work proactively and positively with the other land owners with interest on the peninsula. Clearly some of the land at Lodge Hill has a number of challenges associated with it in terms of delivery, most notably the SSSI. Gladman believe that the consortium have demonstrated that the proposals for Hoo are deliverable with or without the additional SSSI land shown in development scenario 4. The Council will be considering the impact that Lodge Hill had on the previous Local Plan and therefore whilst Gladman are supportive of the need for Lodge Hill to be addressed through the Local Plan the Council must be comfortable that it has the evidence it needs to allocate that part of the site for development, to ensure that the Local Plan can be found sound at examination.
- 5.1.10 What is clear however is that whilst the Hoo Rural Town and the development of brownfield land will make a significant contribution towards meeting housing needs, in order to address overall plan capacity and 5 year land supply requirements, it will be necessary for the Council to consider a wider spatial strategy. Gladman are supportive of the council when it acknowledges under DS2: Spatial Development Strategy that it will consider a lesser scale of development in a range of settlements including High Halstow, Lower Stoke, Allhallows Grain and Halling, all (bar Halling) located on the Hoo Peninsula. Clearly given that the scale of services and facilities to be provided in the expanded Hoo would serve the wider peninsula there is logic to this approach. However, we would question why in doing so the Council has failed to include settlements such as Cliffe and Cliffe Woods into the proposals. These settlements are no less sustainable than the ones listed in the policy and no justification is given for the proposed approach. Gladman requested therefore that Cliffe and Cliffe Woods are added to the text of policy DS2 and that the settlements are allocated growth

accordingly. Gladman have addressed the perceived sustainability issues at Cliffe Woods through the appeal, and have identified public transport investment which significantly improves the ability of residents to access Cliffe Woods by means other than the private car.

- 5.1.11 In order to meet the housing requirement the plan will need to identify sites in a wide range of sizes from small, medium to large. In a range of locations, such an approach will be vital to succeeding in delivering housing needs. The Housing White Paper has made clear that in order to deliver housing, in the volume required, all aspects of the house building industry need to be engaged, whilst large sites have a role to play allocation of small/medium sites is vital to engaging smaller housebuilders who can build alongside the established volume housebuilders. These sites will need to encompass a wider geographical spread in order to allow for multiple sites to be catering to multiple local markets for housing demand.
- 5.1.12 On top of this the Council will need to consider the role housing can and does play in the sustainability of settlements. Smaller more rural settlements have often been starved of development due to previous planning policies, they have often seen services and shops close or struggle and have negatively tilted demographics, where populations have grown older and increasing housing costs have meant that younger people are priced out of markets. It is important therefore that proportionate growth is given to all settlements to address these issues.
- 5.1.13 The issues of identifying more sites in additional locations will need to be addressed in the next iteration of the plan, if it is to be found sound. The key evidence base for doing this will be through the SLAA, Gladman understand that an updated SLAA has been prepared but it has not been published alongside the plan, the most recent SLAA available on the Councils website is from January 2017. That document is very broad brush, many sites are ruled out due to not being suitable but little, if any, commentary is given as to why. A comprehensive new SLAA will need to be produced in order for the Council to be able to justify where and where it has not allocated sites ahead of the next stage of plan consultation.

Conclusion

- 5.1.14 Whilst therefore Gladman support the Council as identifying the Hoo Rural Town as a key component of its development strategy under all options, we consider that the Council needs to consider further the role of all settlements on the Hoo Peninsula to accommodate various levels of growth. The Council will need to ensure it can allocate sufficient development to meet its needs.
- 5.1.15 In addition the Council must, in order to have reasonable prospect of adopting a sound plan, use the Standard Methodology as the starting point for calculating its housing needs.

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

- 5.2.1 Broadly yes. As outlined above Gladman believe that it is imperative that a range of sites are identified and that the Standard Methodology is used for the starting point for calculating housing needs.
- 5.2.2 In addition the policy should make reference to the need to, in effect, over allocate by circa 10%-20% to ensure that targets can be delivered. It is inevitable that some slippage/problems will occur on allocated sites. A contingency will be required to ensure that the plans overall targets can be met.
- 5.2.3 Gladman recognise and support the inclusion of the Hoo Rural Town in policy H1.

5.3 Question H2/H3/H4

- 5.3.1 Gladman note the emerging policies H2/H3/H4. At this stage Gladman would merely comment that the mix's selected by the Council will need to be carefully balanced to ensure that all such proposals are viable when the affordable housing requirements are factored into any infrastructure provision required.

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

- 5.4.1 No. Gladman consider that the inclusion as a requirement of custom build plots could have the unintended consequence of slowing down site delivery. In addition we would question whether there is evidence to demonstrate sufficient demand for custom building to meet the levels of potential supply indicated by allocating 5% of plots on sites over 400 units for custom build housing.

6 SITE SUBMISSIONS

6.1 Introduction

6.1.1 Gladman would like to promote the following sites for inclusion within the Medway Local Plan.

- Chattenden Lane, Chattenden
- Dux Court Road, Hoo St Werburgh
- Radcliffe Highway , Hoo St Werburgh
- Town Road, Cliffe Woods

6.1.2 We believe all of the sites are sustainable and capable of helping meet Medway's housing growth needs and or providing land for commercial development. Some sites have been previously submitted or considered by the Council within the SLAA, or are known to the Council through the submission of planning applications. Should the council wish any further information relating to any of the sites discussed below Gladman would be happy to discuss them in further detail.

6.2 Hoo Rural Town

6.2.1 The sites promoted by Gladman at Chattenden Lane, Dux Court Road and Radcliffe Highway are all included within the Barton Willmore representation focusing on the Hoo Rural Town. Detail of development proposals and capacities is contained within that representation and is not repeated here.

6.3 Town Road, Cliffe Woods

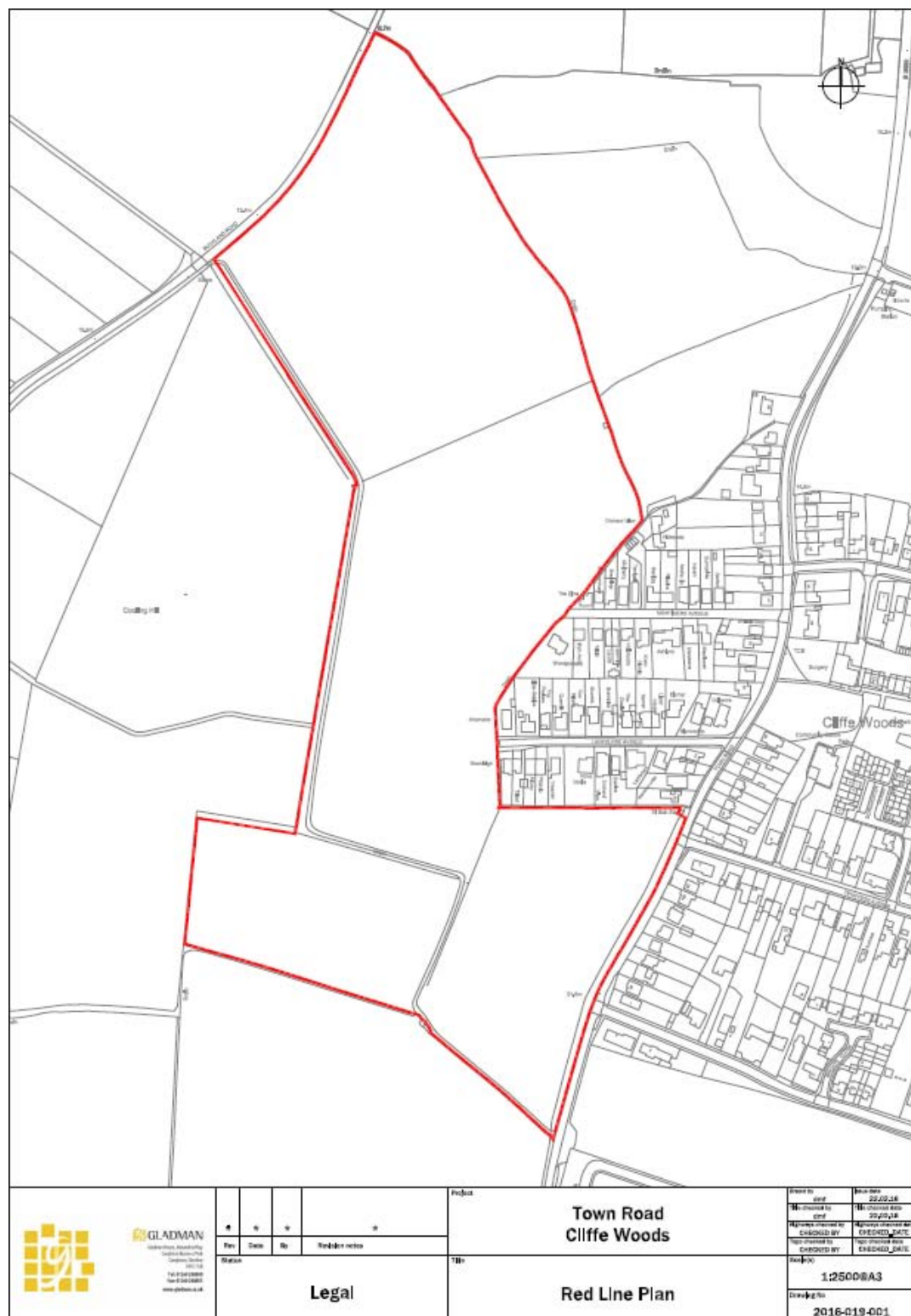
6.3.1 Gladman would also like to promote land at Town Road, Cliffe Woods for residential development. The site is capable of delivering circa 225 dwellings (including 25% affordable housing) in a sustainable location, the site would be able to make a quick contribution to the 5 year land supply of the district.

6.3.2 The site has been the subject of a recent planning application which was refused by the Council for the following reasons:-

- a. Cliffe Woods is not considered to be a sustainable location for a single use development of this scale and that there are insufficient employment facilities and services within the village or services in surrounding towns and villages accessible by sustainable transport modes.
- b. The proposed development would have an adverse impact on the character and visual amenity of the area considered to be a 'valued landscape'.

6.3.3 Gladman note the Council's reasons for refusals, and believe that these issues can be overcome. There are no technical reasons for refusal. Gladman have appealed against the decision made by the Council and the Planning Inspectorate will consider the merits of the appeal in due course.

- 6.3.4 However, Gladman would wish to continue to work with the Council to address the reasons for refusal and to provide the Council with the appropriate further information to allow the Council to allocate the site for residential development. As we have noted in previous sections the Council, to its credit, has set out to meet the large scale need for housing to which the Local Plan must provide, as we have discussed in relation to the development scenarios outlined in the consultation document Gladman consider that there are limited options for the Council to sustainably and realistically meet their needs.
- 6.3.5 Whilst the large scale redevelopment of Hoo and Chattenden will be key to meeting development needs, as the plan itself recognises, sustainable settlements outside of the Green Belt, such as Cliffe Woods will need to take housing growth. This will be necessary for the plan to meet its development targets, as well as ensuring that the facilities and services within Cliffe Woods can be maintained. Importantly locations such as Cliffe Woods offer the opportunity to deliver sites which are different in market, size and scale than those in the urban area of Medway and in the proposed development location of Hoo and Chattenden. It is vital that as broad a supply and location of sites as possible is brought forward to compliment the large scale growth of Hoo in order to ensure plan targets are delivered. It is also important to note that all potential future development scenarios envisage growth at Cliffe Woods. Given the nature of the settlement there are only limited locations where such growth could be accommodated.



7 CONCLUSIONS

- 7.1.1 Gladman have considered in depth the Council's Development Strategy document, and at this stage would support the Council in identifying the Hoo Rural Town as key to all its development scenarios.
- 7.1.2 Gladman however consider that in order to develop a sound plan the Council must seek to use the governments Standard Methodology in calculating its OAN for the next round of plan making. Should the Council arrive at the conclusion that it cannot accommodate this level of housing need it will need to develop a detailed evidence base setting out the reasons why, and explore through the Duty to Cooperate which of its neighbouring authorities will take the remaining housing needs. Not using the Standard Methodology would leave the plan at significant risk of being found unsound.
- 7.1.3 As stated above there will likely be a need for the Council to find additional sites to meet the housing levels outlined through the Standard Methodology, further whilst the Hoo Market Town and brownfield regeneration will clearly be the fundamental building blocks of the local plan in terms of its housing allocations it will be necessary to consider the roles of the other, smaller more rural settlements. We would expect that the roles that Ciffe and Cliffe Woods can play are reconsidered and that proper consideration is given to the sites in those areas currently considered to be unsuitable in the 2017 SLAA.
- 7.1.4 Gladman are overall therefore supportive of the prospect of the core principle of the Hoo Market Town, however we believe in order for the plan to be found sound the Council will need to embrace the Standard Methodology and reconsider the roles of a number of settlements. Proportionate additional small to medium scale allocations will also be required.

