



# DEAN LEWIS.

ESTATES LIMITED

Planning Policy Team

Medway Council

Gun Wharf

Dock Road

Chatham

Kent

ME4 4TR

26th April 2023

Dear Sir or Madam,

**Representations in Respect of High Halstow Neighbourhood Plan 2020-2037 Regulation 16 Submission Consultation – Dean Lewis Estates Limited – Interested Party.**

This document provides Dean Lewis Estates Limited 'Representations' to Medway Council in response to the High Halstow Neighbourhood Plan 2020-2037 Regulation 16 Submission Consultation.

Dean Lewis Estates Limited have a land interest at Christmas Lane which immediately adjoins land that is within the control of Redrow and together, the two sites compromise the proposed allocation Policy HH PQ4 'Land to the East of High Halstow'.

High Halstow Parish Council published the Regulation 14 Consultation of the Neighbourhood Plan 2020 – 2037 in October 2021. Formal representations were submitted by Dean Lewis Estates and Redrow to the Regulation 14 Consultation. These representations should be read in conjunction with those original representations.

Dean Lewis Estates support for the overarching principles of the Neighbourhood Plan which seek to balance the growth needs within this part of Medway with the need to sustain and enhance community life whilst respecting and enhancing environmental assets. The inclusion of the Dean Lewis Estates and Redrow land interests at Christmas Lane for housing and community facilities is wholly supported.

In terms of the requirement for the NP to meet the basic conditions tests as set out in the NPPG and for the Neighbourhood Plan to proceed to referendum, stage certain revisions are required, with particular regard to policy HH PQ4.

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It is also noted that in March 2023 Redrow submitted a hybrid planning application for up to 760 new dwellings plus supporting infrastructure and community facilities (Ref. MC/23/0855). Dean Lewis Estates will be bringing forward an application their site for circa 55/60 dwellings in the near future.

It is important to recognise that Dean Lewis Estates and Redrow have liaised to ensure that the design of the two schemes ensures effective integration. In this context both parties have also participated in constructive discussions with the High Halstow Neighbourhood Plan group.

## **High Halstow – Overall Context**

At a Cabinet Meeting in March 2023, Medway Officer's advised Cabinet that "there are areas where the draft Neighbourhood Plan could be seen to pre-empt the new Medway Local Plan, and some policies and requirements in the design code could be overly onerous and a barrier to development coming forward".

With regard to the matter of potential pre-emption of the emerging Medway Local Plan, this is simply a consequence of timing of this NP. However, the substantial assemblage of evidence base documents that have been prepared in support of the emerging Medway Local Plan clearly demonstrate the need for significant growth on the Hoo Peninsula which includes growth at High Halstow.

The Medway Local Plan has been through 3 rounds of regulation 18 consultation and is scheduled to go through a further round of Regulation 18 consultation this year with progression to Reg 19 late 2023 or early 2024. Notably, every iteration of the Reg 18 plans has included a policy basis for significant growth at High Halstow as part of the Hoo Peninsula growth proposals.

Further, we agree with the Council officers that the Design Code Document submitted alongside this Reg 16 NP is overly prescriptive.

## **High Halstow Neighbourhood Plan (Regulation 16) Consultation - Policy HH PQ4 Land to the East of High Halstow**

The Neighbourhood Plan policies should enable development to meet the identified needs of the plan area and be consistent with the wider aims of objectives of the emerging policy context of the wider Medway Local Plan area. We consider that overall the Neighbourhood Plan has developed a shared vision for the area which will help to deliver sustainable development on the Hoo Peninsula. This approach accords with the social, economic and environmental objectives within paragraph 8 of the NPPF.

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However, the approach as set out in Policy HH PQ4 and paragraph 7.14 states that “applications for development of the site will be considered premature ahead of the new Medway Local Plan being adopted and HIF strategic infrastructure being in place”. **This element of Policy HH PQ4 should be deleted.** Consistency with the emerging Local Plan Policies, having regard to the evidence base would however be appropriate.

This policy requirement is neither reasonable nor justified. It is in direct conflict with the Council’s growth aspirations for the area and is inconsistent with the suite of evidence that has underpinned the NP. This evidence base clearly demonstrates that High Halstow is capable of delivering sustainable development. Importantly this policy approach also would not accord with the existing adopted Local Plan, the policies of which lack accordance with the NPPF due the aged nature of the of the Local Plan. Consistency with the NPPF should have primacy in this instance.

Aside of the NP proposed allocation, the Site was proposed for allocation for residential development (including land reserved for a 2FE primary school and potential other uses, which are yet to be defined) in the Medway Local Plan Regulation 18 (June, 2020) and the Regulation 19 (October, 2021) documents, as site 113 ‘Land East of High Halstow’ and F.4, respectively.

The Medway Council Strategic Land Availability Assessment 2019 (Site Ref: 113) also regarded the Site to be achievable and available for development. It was also considered suitable subject to transport and environmental impacts. These impacts will be mitigated by schemes funded by the Housing Infrastructure Fund (“HIF”). The HIF expenditure programme on these matters is well underway. A fact that Medway Council will be able to endorse.

Notably, the Site is also identified as part of the wider growth proposals on the Hoo Peninsula that are set out within the emerging Medway Hoo Development Framework (“HDF”). This HDF demonstrates the synergy between the HIF expenditure of £170M for major infrastructure provision and the emerging policy which identifies the Hoo Peninsula, including High Halstow, as a major growth location.

In summary, for the allocation as proposed in policy HH PQ4 to have the meaningful effect of delivering growth, the effective timing embargo needs to be removed.

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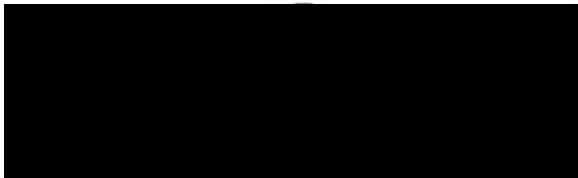
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## Overview

Dean Lewis Estates support overall context of the High Halstow Neighbourhood Plan. Subject to the removal or appropriate revision of HH PQ4 we consider that the NP could be found sound and would be an effective policy tool to deliver sustainable development on the Hoo Peninsula.

Should you have any questions or clarifications regarding these representations, please do let me know. I would also be most grateful if you would confirm that these representations are duly submitted.

Yours Sincerely



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