

**Hoo St Werburgh and Chattenden  
Neighbourhood Plan Regulation 16 Consultation  
Representations on Behalf of Homes England**

February 2024

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Date: February 2024

For and on behalf of Homes England

# 1. Introduction

- 1.1 Avison Young (AY) is instructed on behalf of Homes England (the freeholder) to prepare and submit representations to the ongoing consultation exercise in respect of the "Regulation 16" version of the emerging Hoo St Werburgh and Chattenden Neighbourhood Plan (HSW & CNP).
- 1.2 Homes England thanks the Hoo St Werburgh Parish Council for the opportunity to comment on the emerging Neighbourhood Plan (NP). Homes England submitted representations to the Regulation 14 consultation of the HSW & CNP in July 2023.
- 1.3 This latest set of representations provide much of the same information and reiterates many of the same points raised in the July 2023 response. This repetition is to ensure that the Neighbourhood Plan Examiner is aware of both the significance of Homes England's landholdings within the NDP Boundary and the contribution that these landholdings can make to the delivery of sustainable patterns of development.
- 1.4 Homes England is the Government's housing and regeneration agency. Its mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This objective supports; greater social justice; the levelling up of communities across England and the creation of places people are proud to call their home. Homes England's mission is underpinned by a number of strategic objectives that are outlined in its Strategic Plan (2023 – 2028) ([link: https://www.gov.uk/government/publications/homes-england-strategic-plan-2023-to-2028](https://www.gov.uk/government/publications/homes-england-strategic-plan-2023-to-2028)).
- 1.5 Homes England is the freehold owner of the Lodge Hill estate. The proposals contained within these representations seek to ensure that Homes England's land, including development opportunities at Chattenden Barracks and Lodge Hill Camp, make a positive contribution, not only to meeting the development needs of the area but also the vibrancy and success of the wider place.
- 1.6 These representations are structured as follows:
- **Section 2** – overview of Homes England's landholdings and aspirations for future development at Lodge Hill Camp and Chattenden Barracks.
  - **Section 3** – overview of the planning context in relation to Homes England's land and the surrounding area.
  - **Section 4** - detailed response to the Regulation 16 draft of the HSW & CNP document.

- **Section 5** – commentary on the extent to which the Regulation 16 Plan currently meets the “basic conditions” required of a neighbourhood plan by the National Planning Policy Framework (NPPF).



## 2. The Site and Background

### The Site: Homes England's Land Ownership

- 2.1 Homes England is the freehold owner of the former MoD (Ministry of Defence) site. This landholding is shown in its entirety at Appendix 1. Figure 2.1 (below) illustrates Homes England's landholdings at Lodge Hill in the context of the HSW & CNP area. This area extends to circa 325 hectares with a significant part of the site located within the Neighbourhood Plan area.
- 2.2 Homes England's intention is to unlock development opportunities within the site at Chattenden Barracks (plan at Appendix 2) and Lodge Hill Camp (plan at Appendix 3). The aspiration is that the redevelopment of these parcels will be well-designed and sustainable, responding to local development needs, and making a positive contribution to the local community whilst minimising the environmental impact in accordance with the objectives outlined in Homes England's Strategic Plan.



**Figure 2.1 – Plan illustrating an overlap of Homes England landholdings across the HSW & CNP Area.**

**Source: Avison Young and Google Earth**

- 2.3 Part of the former MoD site is designated as the “Chattenden Woods” and “Lodge Hill” Site of Special Scientific Interest (SSSI) (CWLH SSSI), which includes areas of Ancient Woodland and other land adjacent to the SSSI within the HSW & CNP area. The CWLH SSSI features include ancient and long-established lowland mixed deciduous woodland; lowland neutral grassland; and a breeding population of

nightingale. These ecological sensitivities will be considered as part of any future development proposals.

- 2.4 Two potential development parcels are the focus of these representations: Chattenden Barracks (including the former Military Recreation Ground) and Lodge Hill Camp.
- 2.5 The Chattenden Barracks site is located between Lochat Road to the south and west, Kitchener Road to the south, and Chattenden Lane to the east. The land parcel extends to approximately 24 hectares and is the site of the former Chattenden Barracks that were occupied from the 1870's to the 1980's, after which time the buildings (apart from a substation) were demolished.
- 2.6 Extensive areas of hardstanding and the footings and floor slabs of buildings remain on extensive areas of the site. The site is "previously developed land" for the purposes of applying National Planning Policy.
- 2.7 Lodge Hill Camp is north of the Chattenden Barracks site and extends to circa 9 hectares. It lies to the west of Lodge Hill Lane and to the north of Lochat Road. Development in this area dates back to the interwar period. The site currently comprises a mixture of existing buildings, structures and hardstanding that still remain, surrounded by paved parking areas and informal green space. These buildings were previously used as a training facility by the MoD.
- 2.8 Lodge Hill Camp is also "previously developed land" for the purposes of applying National Planning Policy.

### **Background and History**

- 2.9 The sites were previously operated by the MoD as an ordnance depot and British Army training camps.
- 2.10 In 2011, prior to Homes England's involvement, the Defence Infrastructure Organisation (DIO) and Land Securities submitted a major outline planning application for the redevelopment of the whole site, including both Lodge Hill Camp and Chattenden Barracks. The planning application sought permission for the construction of up to 5,000 homes and other associated development (ref MC/11/2516). Following the submission of the planning application, large parts of the site were designated as SSSI and the planning application was withdrawn.
- 2.11 Parts of the DIO's Lodge Hill Estate were transferred to Homes England in January 2018. Since this time, Homes England has been working to promote parts of the estate (for redevelopment). In recognition of the SSSI notification, the scale of development being promoted is substantially less than the original proposals promoted by the DIO and Land Securities.

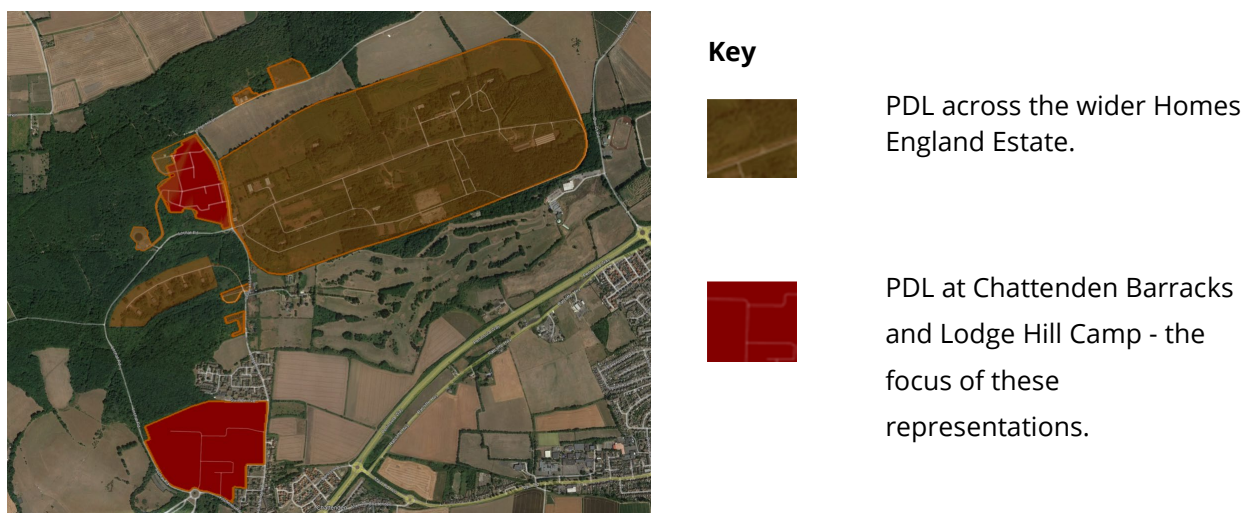
- 2.12 Homes England has submitted numerous representations in respect of Chattenden Barracks and Lodge Hill Camp as part of Medway Council's Local Plan preparation process. The most recent of these was in response to the "Call for Sites" exercise that took place between November 2022 and February 2023, and the "Regulation 18" consultation exercise in October 2023.

### The Site: Previously Developed Land

- 2.13 The National Planning Policy Framework (NPPF) is a key consideration in plan-making and decision taking purposes. The NPPF (Page 74) provides a definition for previously developed land (PDL) as follows:

*"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."*

- 2.14 The sites have historically been developed and operated by the MoD for military use and provided accommodation for MoD employees stationed on the site. Figure 2.2 (below) identifies the PDL parcels within Homes England's land ownership.



**Figure 2.2 – Previously Developed Area of Homes England's landholding at Chattenden Barracks**

**Source: Avison Young and Google Earth**

2.15 In relation to Previously Developed (or 'brownfield') land NPPF paragraph 123 states that:

*"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic Policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield land'". [our emphasis added]*

2.16 This means that planning policies and decisions should both (NPPF paragraph 124):

*"a) encourage multiple benefits from both urban and rural land... and take opportunities to achieve net environmental gains such as development that would enable new habitat creation...*

*c) give substantial weight to the value of using suitable brownfield land within settlement for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.*

*d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively..."*

2.17 The detail and definitions contained within the NPPF have been used to inform Figure 2.2, which identifies the areas of PDL within Homes England's landownership. Both Chattenden Barracks and Lodge Hill Camp are PDL. Therefore, in line with the NPPF, should be prioritised for development in preference to "Greenfield" Land (subject to design and technical matters).

### **Homes England's Development Aspirations**

2.18 Homes England is promoting the redevelopment of two sites, which are:

- Land at Chattenden Barracks (Appendix 2), which is being promoted for residential development to provide up to 500 homes.
- Lodge Hill Camp (Appendix 3), which is being promoted for redevelopment to provide a mix of uses that could include employment, residential, community etc. Further investigation is required to determine the uses that could be appropriate and whether the site will come forward for a single or mix of a uses in future.

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<sup>1</sup> Except where this would conflict with other policies in the Framework, including causing harm to designed sites of importance for biodiversity

- 2.19 Further information on these proposals is provided throughout this document. These representations are accompanied by a “Vision Document” which sets out how the two parcels could be developed and provides extensive technical information (Appendix 4).

### **Summary**

- 2.20 Chattenden Barracks and Lodge Hill Camp are being promoted for allocation within the HSW & CNP. They are both previously developed, publicly owned sites that offer significant potential for new housing and employment generating uses. The redevelopment of these sites offers the opportunity to deliver high-quality development in well-designed places that minimise the environmental impact in line with the objectives contained within Homes England’s Strategic Plan. The remainder of this document provides further information on their suitability and the proposed wording of a future policy.

### 3. Planning Context

- 3.1 In this section we refer to the adopted and emerging Development Plan position in respect of Homes England's landholdings at Lodge Hill, with a particular focus on Lodge Hill Camp and Chattenden Barracks.

#### **Adopted Development Plan**

- 3.2 The adopted Development Plan for Medway comprises saved policies from the Medway Local Plan 2003. The adopted plan is "out of date" (for the purposes of carrying out a "planning balance" exercise) because it does not demonstrate a 5-year housing land supply when assessed against a current target. Medway's 5-year housing land supply, as at 31 March 2023, stands at 3.3 years.

- 3.3 When considering the weight to be attached to out of date policies in the decision making process the NPPF states;

*"Existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this framework."*

- 3.4 The main saved policy relating to potential development of Chattenden Barracks and Lodge Hill Camp is Policy S14 (Ministry of Defence Estate, Chattenden) which states:

*"The council will not permit the piecemeal redevelopment of the Chattenden Barracks and military training areas during the lifetime of this plan. The site has long term development potential for business, educational and/or residential uses and this will be considered in the next review of the Medway Local Plan."*

- 3.5 It is considered that the intentions previously envisaged within Policy S14 of the adopted Local Plan have been superseded by changes in circumstances in the area. The designation of the SSSI means that the scale of development previously proposed is not now appropriate due to the sensitivities of the SSSI.

- 3.6 Government guidance contained within "Planning Practice Guidance" considers the relationship between adopted Local Plans and Neighbourhood Plans. The guidance confirms that Neighbourhood Plans;

*"should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies."* NPPG Paragraph: 070 Reference ID: 41-070-20190509.



- 3.7 The above sets up a nuanced relationship between the adopted Local Plan and the emerging Neighbourhood Plan. The Neighbourhood Plan should reflect the provisions of the adopted Local Plan and should not compromise its strategic objectives. However, because the adopted Local Plan is out of date, the Neighbourhood Plan should only reflect strategic Local Plan policies to the extent that they accord with the provisions of the NPPF.
- 3.8 We conclude that the adopted Local Plan offers broad support for the development of an appropriate amount of Homes England's previously developed land. This objective is reiterated in the NPPF. Any development on Homes England's landholdings would therefore align with and be consistent with the adopted spatial strategy. Accordingly, it is maintained that the Neighbourhood Plan should support, in principle, the allocation of appropriate previously developed sites within the former MoD site (now Homes England's Landholdings), i.e. the land at Lodge Hill Camp and Chattenden Barracks.

### **Emerging Local Plan**

- 3.9 Medway Council is in the process of preparing a new Local Plan. As part of this, the Council previously undertook three rounds of consultation at the "Regulation 18" stage. However, in October 2022 the Council made the decision to return to the previous stage of Local Plan preparation. The reasons for withdrawing the Plan did not relate to proposed growth on the Hoo Peninsula.
- 3.10 At the time the emerging Local Plan was withdrawn Medway Council had ambitious plans to deliver significant housing growth on the Hoo Peninsula. The authority acknowledged that it had a significant shortfall of land for housing when assessed against the Government's housing targets. It sought to address this shortfall by promoting comprehensive residential development on the Hoo Peninsula, using green field and brown field land.
- 3.11 The Council recognised that significant new infrastructure would be required to fulfil its growth ambitions. To facilitate this, the Council successfully bid for HIF funding to support the delivery of new roads and a rail interchange. However, the HIF funding was subsequently withdrawn in late 2023, which prompted the Council to review various alternative growth opportunities.
- 3.12 To inform the continued preparation of the Local Plan, Medway Council undertook a "Call for Sites" exercise between November 2022 and January 2023. The Council subsequently undertook a Regulation 18 Consultation on the emerging Local Plan in October 2023. This consultation did not include detailed policies or identify preferred sites for development. Homes England promoted both Chattenden Barracks and Lodge Hill Camp as development opportunities through both of these exercises. The Vision Document (which accompanies these representations at Appendix 4) was submitted with the Local Plan representations also. The Regulation 18 version of the draft plan identified four broad

categories of locations where development could take place, reflecting Medway's geography. These being Urban Regeneration, Suburban Growth, Rural Development and Green Belt Loss. Homes England's sites were identified within the Rural Sites category following the earlier Call for Sites submission. It is understood that Medway Council is in the process of considering representations made as part of the Regulation 18 consultation. Alongside this Medway's Land Availability Assessment, which was informed by the Call for Sites, will now proceed to the next stage of detailed assessments, along with the Sustainability Appraisal process, which will help to inform Medway's spatial strategy for the Hoo Peninsula.

3.13 In December 2023, the Secretary of State wrote to Medway Council and directed the Council to publish an updated Local Development Scheme within 12 weeks of the publication of the revised NPPF (i.e. by 12 March 2024). This intervention stems from the fact that Medway Council has not adopted a local plan prepared in accordance with The Planning and Compulsory Purchase Act 2004 and is not currently taking its draft plan through the examination process. The deadline for the submission of plans under the current system is 30 June 2025 and so there is a strong desire to ensure that the authority has an up-to-date timetable to work towards. Medway's 13<sup>th</sup> February Cabinet approved a revised Local Development Scheme (dated February 2024) which sets out the following timetable for the production of the new Medway Local Plan:

- Regulation 18 (b) *Reasonable alternatives of the spatial strategy*: June - July 2024
- Regulation 19 *Publication of the draft Local Plan*: January 2025
- Regulation 20 *Representations on the draft Local Plan*: January – February 2025
- Regulation 22 *Submission to the Secretary of State*: June 2025
- Adoption: Autumn 2026

3.14 Medway Council recognises that it has a significant need for new housing. Housing need has risen from 1,586 homes per annum (26,962 new homes by 2037 in the October 2021 Regulation 19 version) to 1,667 homes per annum, which requires a minimum an additional 81 homes per year. The Regulation 18 Consultation document stated, at Paragraph 5.12, that:

*“the housing need for Medway over the plan period 2022-2040 is for 28,339 homes. Providing for a buffer to allow some sites not coming forward for development would lift the total plan need to over 29,000 homes”.*



- 3.15 Taking into account the existing pipeline of sites with planning permission that have not yet been built, the Council is currently assessing options to make provision in the emerging Local Plan for site allocations totalling circa 19,173 homes to meet the needs of Medway. Medway has also been asked to consider its capacity to provide an additional 2,000 homes to help meet Gravesham's housing need. Given the context of the local area, it is anticipated that much of this development would be required to come forward on greenfield sites. There is therefore a pressing demand to ensure that suitable, available and achievable sites that provide sustainable development options are able to come forward to help meet this need.
- 3.16 Homes England's land at Chattenden Barracks and Lodge Hill Camp offer the opportunity to meet local development needs. Given their previously developed nature, coupled with their sustainable location, we conclude that these land parcels represent a logical and sustainable location for development within the Neighbourhood Plan area. The sites should be identified and allocated in the Neighbourhood Plan without risk or prejudice to a new version of the Local Plan brought forward by the Council in due course.

### **Hoo Development Framework (HDF)**

- 3.17 Medway Council has previously published a draft Hoo Development Framework (HDF) for consultation as part of its work in planning for growth across Medway. This document provides a high-level strategic overview of potential development on the Hoo Peninsula over the next 30 years.
- 3.18 A draft of the HDF was published for consultation between September and November 2022. It identified Chattenden Barracks as suitable for residential led development, which accords with the proposals outlined in these representations.

### **Planning Policy Summary**

- 3.19 In summary, housing delivery in Medway has stalled to the extent that the Secretary of State has intervened and has sought to rectify the situation. We have approached our assessment of the HSW & CNP with this in mind and have provided commentary which sets out why the NDP should not restrict development on PDL that is, in principle, an acceptable location for future development.

## 4. Detailed Response to Regulation 16 Consultation

- 4.1 The HSW & CNP area was formalised by Medway Council in December 2018. Since that time the Hoo St Werburgh Parish Council's Neighbourhood Plan Steering group has worked on the preparation of the draft plan. The "Regulation 16" version of the Neighbourhood Plan is the last opportunity for interested parties to comment on the document before the plan proceeds to examination, subject to it satisfying the basic conditions.
- 4.2 The HSW & CNP sets out the local community's aspirations for the Hoo St Werburgh Parish over the period to 2040. We note that the plan period has been extended since the Regulation 14 version to accord with the emerging Medway Local Plan which is expected to guide the development and use of land in Medway up to 2040. Homes England welcome this update.
- 4.3 We acknowledge that some of the previous comments made as part Homes England's response to the Regulation 14 consultation have been addressed as part of the latest document (dated December 2023). This section provides additional comments and suggestions on the proposed policies, as well as picking up on the points previously made regarding the draft Design Guide.
- 4.4 However, in the first instance, we reiterate our suggestion that two new policies be added that allocate Chattenden Barracks (Appendix 2) and Lodge Hill Camp (Appendix 3) for development.
- 4.5 Suggested wording for the two policies is as follows:

*"HOOXXX: Chattenden Barracks – Land at the former Chattenden Barracks site is allocated for up to 500 new homes and associated infrastructure."*



**Figure 4.1 – Chattenden Barracks – Proposed Allocation Boundary**

**Source: Avison Young and Google Earth**

*"HOOXXX: Lodge Hill Camp – Circa 9 hectares of land at the former Lodge Hill Camp site is allocated for a range of uses including employment (Use Classes E; B2, B8, C2, F1 and F2 and waste management) and residential uses (C2 and C3). Other uses, which fall outside the use classes identified, may also be suitable, subject to satisfactory resolution of technical matters."*



**Figure 4.2 – Lodge Hill Camp – Proposed Allocation Boundary**

**Source: Avison Young and Google Earth**

- 4.6 A plan showing the exact boundaries of these sites is included within Appendix 2 and 3, but the general locations are shown above for reference.
- 4.7 The remainder of this section focuses on the draft policies and documents prepared to support the Neighbourhood Plan. Comments are provided on the following proposed policies:-
- a) HOO1 Village Centres and Employment
  - b) HOO3: Industry and Distribution
  - c) HOO4: Housing Growth and Mix
  - d) HOO7: Local Heritage
  - e) HOO8: Landscape and Environment
  - f) HOO11: Sustainable Transport and Active Travel
- 4.8 In commenting on these matters, we re-identify potential conflicts with the planning policy framework. Using the conclusions reached in this Section, we go on, in section 5, to comment on the extent to which the Neighbourhood Plan satisfies the “basic conditions”.

- 4.9 Where we have not commented on the emerging policies we are of the view that they are not of direct relevance to Homes England's landholdings at this time.

## Employment

- 4.10 **Policy HOO1: Village Centres and Employment** (Page 22) – provides support for employment development (Use Class E) in the following locations:

*"a) within the village centres;*

*b) brownfield sites;*

*c) redevelopment or improvement of existing employment sites."*

- 4.11 The support for employment development, under Use Class E, on brownfield sites is welcomed. However, there is potential for other appropriate uses on Brownfield sites within this neighbourhood plan area. We therefore conclude that this policy, or other policies in the plan, should provide in principle support for other uses on Brownfield land, including Use Class B2, B8, C2, F1 and F2.

- 4.12 In light of this, it is suggested that criteria 1 be amended to:

*"Employment development (Use Class E **and any other appropriate employment generating use class**) will be supported in the following locations..."*

- 4.13 Further to the above, we believe that the Neighbourhood Plan should confirm Lodge Hill Camp as an appropriate opportunity for sustainable development and should be allocated for a range of uses, including employment. A proposed allocation is considered appropriate and could be introduced as highlighted at paragraph 4.4 of these representations.

## Industry and Distribution

- 4.14 **Policy HOO3: Industrial and Distribution** (Page 28) – supports industrial (B2) and distribution (B8) development in two, named, areas: Kingsnorth Employment Area and Hoo Marina Industrial Estate. The draft policy does not identify other circumstances in which industrial and/or distribution development may be acceptable.

- 4.15 The NPPF obliges decision makers to make as much use as possible of previously-developed land. In relation to economic development NPPF paragraphs 85 – 89 seek to ensure that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. This means that planning policies should *"set out a clear economic vision and strategy which positively and*

*proactively encourages sustainable economic growth... and be flexible enough to accommodate needs not anticipated in the plan”.*

4.16 We conclude that Criterion 1 of this policy should therefore be amended to:

*“Industrial (B2) and distribution (B8) development will be supported **on appropriate previously developed land and** in the following industrial estates.”*

## Housing

4.17 **Policy HOO4: Housing Growth and Mix** (Page 34) – establishes policy support for housing in addition to strategic sites identified in the Local Plan.

4.18 Homes England is disappointed to see the revised wording of Policy HOO4 which has been altered from that stated within the previous Regulation 14 draft.

4.19 The policy as now drafted states that housing will be supported in the following locations where there is no significant impact on existing amenity, historic, landscape or natural environments:

*“a) in existing built settlements, including brownfield sites and infill development within the existing built frontages;*

*c) Upper floors in commercial properties, providing there is no resulting conflict with existing commercial uses and the scheme can provide satisfactory residential standards;*

*d) Conversion of agricultural buildings, providing that there is no significant loss of the best and most versatile agricultural land.”*

4.20 The updated policy wording omits reference to “Brownfield sites” as a standalone category and instead classifies these as being brownfield sites within the existing built settlement. A Settlement Boundaries Map has now been added into the NDP on Page 24 which depicts the urban area.

4.21 As we have set out through these representations, the Government’s planning policy framework establishes that the best use should be made of previously developed sites, or brownfield land. The guidance does not establish that such sites should only be considered within existing settlement boundaries. The guidance establishes robust policy tests related to sustainability. These tests consider, amongst other matters, the locational sustainability of sites. Development proposals for all previously developed sites must be considered on their individual merits. Whether or not a PDL site falls within a settlement boundary or not is irrelevant.

- 4.22 We maintain that “*Brownfield site’s*” should be reintroduced as a standalone category.
- 4.23 Homes England also notes the additional text that has been added to the preamble to proposed Policy HOO4 of the emerging Local Plan, which states:

*“Policy S14 is contentious due to environmental impacts, so it is unclear whether this will survive to adoption”.*

- 4.24 This statement refers to Homes England’s sites and prejudices the outcome of the Local Plan preparation process. This is inappropriate and the reference should be removed from subsequent drafts of the HSW & CNP.
- 4.25 As set out through these representations, Chattenden Barracks is being promoted for residential development to provide up to 500 homes, and Lodge Hill Camp is being promoted for a range of uses that could include residential. Both of these sites are brownfield, and as such the allocation of these two previously developed sites for development in the Neighbourhood Plan would offer strong policy support for development outside the overarching provisions of an up-to-date Local Plan. The two sites are not “strategic” in scale, hence their development would not prejudice or inform strategic decisions on new growth in Medway. Furthermore, the two sites have been developed previously. Their development would accord with the provisions of the NPPF and the need to significantly boost the supply of new housing. The allocation of the two sites would therefore be a positive, proactive, step that would bring “planning certainty” and would deliver much needed development in the area in the short term.

## Heritage

- 4.26 **Policy HOO7: Heritage** (Page 43) sets out that:

*“1. Development should preserve or enhance and cause no harm to the character and significance of Hoo’s military and war heritage, including the Hoo Stop Line and its historic structures, features and landscape.*

*2. Development should **seek to have** no significant adverse impacts on non-designated heritage assets and their setting and should take opportunities to enhance them.*

*3. The development and refurbishment of historic farmsteads will be supported, providing the scheme preserves or enhances their character and significance.”*

- 4.27 In relation to part 1 of this draft policy, it is noted that the Hoo Stop Line was an important part of the WWII anti-invasion defences and contains designated as well as non-designated heritage elements, which likely form part of the setting of the designated structures.
- 4.28 The wording “*should preserve or enhance and cause no harm*” appears to be inconsistent with the NPPF. Government guidance categories “harm” to heritage assets as “substantial” or “less than substantial”.
- 4.29 In circumstances where “less than substantial” harm would arise, this must be outweighed by “public benefits”. The Neighbourhood Plan policy should reflect this.
- 4.30 Part 2 of draft policy HOO7 relates to non-designated heritage assets. Paragraph 209 of the NPPF requires a balance judgement when considering the scale of any harm or loss and the significance of a non-designated heritage asset. We acknowledge that the wording of this section of the policy has altered since the Regulation 14 version of the plan, however the wording “*seek to have no significant adverse impacts*” still goes beyond the requirement of the NPPF and should be amended.
- 4.31 A more appropriate wording should be as follows:

*“2. Development should **seek to avoid** significant adverse impacts on non-designated heritage assets and their setting and should take opportunities to enhance them.”*

## Environment

- 4.32 **Policy HOO8: Landscape and Environment** (Page 52) – sets out a series of criteria against which development proposals will be assessed. Part 3 of the policy states:

*“3. Development should take opportunities to enhance and should not harm:*

- a) Designated sites, including Ramsar, SSSI and Special Protection Area;*
- b) local woodlands, including ancient woodland;*
- c) lakes, chalk streams and other water features.*

- 4.33 Whilst we acknowledge that the wording of this policy has been amended since the Regulation 14 version of the document, this policy still appears to go beyond the scope of the National Planning Policy Framework (NPPF). The wording “should not harm” should be deleted as it is not in accordance with the NPPF. NPPF para 186 states:

*“a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;”*



- 4.34 In contrast the policy attempts to establish a complete embargo on any harm. The words "*should not harm*" should be removed or replaced with "*must seek to avoid significant harm to*" so that it is consistent with the NPPF.
- 4.35 Homes England welcome the amendments made to Part 4 of the policy in line with comments made as part of the Regulation 14 response to ensure that appropriate evidence is considered.

## Transport

- 4.36 Homes England welcome the amendment to **Policy HOO11: Sustainable Transport and Active Travel** (Page 66) in line with the comments that were made notes part of the Regulation 14 response.

## Hoo St Werburgh and Chattenden NDP Design Codes

- 4.37 The draft Neighbourhood Plan is accompanied by a set of "design codes" prepared by consultants, AECOM, on behalf of the Neighbourhood Plan preparation group. It is understood that this document will support the Neighbourhood Plan policies on design and provide a framework for the assessment of future development proposals. As requested through the response to the Regulation 14 consultation, further clarity is sought as to how the document will be applied in the latter case.
- 4.38 As previously mentioned, the Neighbourhood Plan will form part of the adopted Development Plan against which any future planning applications will be assessed. Indeed, it could be "made" before a new Local Plan for Medway is adopted. In such circumstances, the Neighbourhood Plan would be the only up to date component of the local development plan, hence its importance to the determination of planning applications within the NP area would be significant. Substantial weight could be afforded to the design codes in the absence of any other, up to date, guidance.
- 4.39 The purpose of the design code is to ensure high-quality development is brought forward in the Neighbourhood Plan area. Delivering high-quality and sustainable places is a key objective within Homes England's Strategic Plan that will be reflected in any future proposals for Chattenden Barracks and Lodge Hill Camp.
- 4.40 Having reviewed the draft design code we note that some requirements, when considered cumulatively, could be restrictive in design terms and not necessarily representative of good placemaking or of local character. Specific points relate to the requirements for building heights, street types (sections and details), car parking and built form. We therefore request that these principles are applied flexibly to enable individual sites to respond to site specific considerations.



- 4.41 There are 6 key themes for the design code with 27 design principles that should guide the design of developments. We note that “all” of the criteria will apply to Local Plan growth sites within the Neighbourhood Plan area. We provide below comments on specific design principles that may be applicable to development at Lodge Hill Camp and Chattenden Barracks:

### **Land Use/ Mix (LU)**

- 4.42 **LU01 Bungalows and nursing homes** – it should be made clear that this tenure should not be a pre-requisite for all 15+ housing development, it is appropriate that these tenures should be considered as an important part of the overall housing mix and provision over which the Neighbourhood Plan area covers.

### **Hierarchy of Movement HM 1 – 4**

- 4.43 **HM3 – Street Types** – We note the following may be restrictive in design terms such as on the table on Page 35 where:

- a) a cycle path is only indicated on the ‘Avenue’ category and not for other street types;
- b) no on street parking indicated to lanes, some Edge Lanes and Mews;
- c) there isn’t consideration of road width requirements to accommodate buses;

- 4.44 It may be preferable to include cycles paths, on street parking and road width to incorporate buses (where appropriate) and so these criteria are considered restrictive. In addition, we note:

- a) the illustrative hedged frontages indicated at all street types may not be appropriate in all instances (i.e. Figures 29-30, 32-33);
- b) the cross section for the Lane seems narrow and may not allow vehicles to pass (figure 32); and,
- c) the Mews cross section on figure 31 appears inconsistent with the layout principles in figure 43.

- 4.45 We also add that in **HM04 Car parking**, some wording is restrictive in terms of design and may not represent good placemaking, for example on page 40:

- a) requirement for side only (and not frontage) parking for detached and semi-detached may be restrictive and not necessarily reflective of good practice; and,
- b) parking on street or “within the Mews building” car parking for Mews and Terraced homes may be similarly restrictive.

### **Landscape, natural and open space (LOS) 1-5**

4.46 LOS2 Query the evidence to inform LOS02 i.e., “Ensure habitats are buffered”. The Design Code should be clear on what evidence has justified this statement. We would advocate that a bespoke approach is included, based on site specific circumstances. It is also important to acknowledge that the emerging Medway Local Plan will set strategic priorities for habitats to which this Neighbourhood Plan will have to be in conformity with.

4.47 **LO3 Wildlife** – It is unclear in what way the statement “Feed birds through the winter” relates to a design requirement, if there is none it should be deleted from LOS03.

### **Built form BF 1-7**

4.48 **BF01 Building scale and massing** – the text “*buildings should... not normally exceed 2 or 2.5 storeys*” appears inconsistent with HOO6 Design “*new build development should compliment the predominantly 2-3 storey character of the area.*” Proposed HOO6 appears reasonable and the design code appears more restrictive especially given there are some 3 storey buildings within the neighbourhood plan area and an urban design case may justify key landmark or focal buildings projecting above the prevalent existing norm.

4.49 **BF02 Density** – We suggest the point that indicates higher densities are supportive in certain contexts is expanded upon, by referencing transport hubs/ local centres and key bus routes. This would give more flexibility to include higher density in such locations that are appropriate. The densities identified here will also need to be consistent with any densities contained in Local Plan documentation and supporting evidence.

4.50 **BF03 Block Types** – we have a few comments including at BF03.01, Figure 41 states that a continuous length of block frontage should not exceed 30 metres, but the rationale for this is not stated or explained. Also, more flexibility is required at BF03.03 Development Edge which states “*New buildings should usually be no higher than existing homes where they are adjacent.*” as this may not be representative of good placemaking principles in all instances.

### **Hoo St Werburgh and Chattenden Local Green Space Assessment**

4.51 The draft Neighbourhood Plan is also accompanied by a Local Green Space Assessment, dated July 2022 as amended on 1 December 2022. Homes England have reviewed this document and do not have any comments to make on its content.

## 5. Conclusions and Basic Conditions

- 5.1 In previous sections we have provided background information on Homes England's landholdings at Lodge Hill on the Hoo Peninsula, including specific development aspirations for Lodge Hill Camp and Chattenden Barracks. We have also explored the prevailing planning policy climate in which the draft Neighbourhood Plan has been prepared.
- 5.2 Through this response we have considered the detailed provisions of the emerging Neighbourhood Plan against the provisions of the planning policy framework, including guidance from central Government.
- 5.3 In this section we set out our conclusions by reference to the "basic conditions" which must be satisfied in order for neighbourhood plans to be lawfully "made".
- 5.4 The "basic conditions" are set out in paragraphs 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 as applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act of 2004. The basic conditions are referred to in paragraph 37 of the NPPF and paragraph D65 (reference ID:41-065-20140306) of the National Planning Policy Guidance Notes. The basic conditions are as follows:-
- a) "having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,*
  - b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,*
  - c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,*
  - d) the making of the order contributes to the achievement of sustainable development,*
  - e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),*
  - f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and*
  - g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order."*
- 5.5 In the following paragraphs we consider the draft Neighbourhood Plan against sub paragraphs A, D and E of the above.

## National Policies

- 5.6 The NPPF establishes that Neighbourhood Plans should have regard to National Policies and advice contained in guidance issued by the Secretary of State.
- 5.7 We have identified several instances in which the policies of the emerging Neighbourhood Plan establish policy tests for the determination of planning applications which are fundamentally different to those contained in the NPPF, for example (but not limited to) HOO7 and HOO8.
- 5.8 We conclude that if these policies are not amended to accord with National Policy there is a significant prospect that the basic conditions will not be satisfied. Accordingly, we recommend that the highlighted policies be amended to ensure compliance.

## Sustainable Development

- 5.9 National Planning Guidance establishes that Neighbourhood Plans must contribute to the achievement of sustainable patterns of development. We acknowledge that the Neighbourhood Plan achieves this objective in broad terms. However, we maintain that the Neighbourhood Plan, as currently drafted does not go as far as it should in this regard.
- 5.10 We conclude that the Neighbourhood Plan could make specific reference to Homes England's land at Chattenden Barracks and Lodge Hill Camp as "previously developed" and capable of making a significant contribution to housing, employment and other development needs in the short term. Whilst we acknowledge that the Neighbourhood Plan refers to previously developed land, HOO4 has been revised to refer specially to brownfield land within the existing settlement boundary.
- 5.11 The reference to PDL within settlement boundaries adds a policy restriction that does not exist in Government guidance. It also ignores the tests of sustainability, which are the correct way in which to test a site's locational sustainability.
- 5.12 We conclude that in order to comply with the NPPF the Neighbourhood Plan could make specific reference to Homes England's land holdings as PDL opportunity sites.

## General Conformity with Strategic Policies for the Area

- 5.13 It is a fundamental premise of Neighbourhood Plan making that the provisions of the plan should be in general conformity with the overarching Local Plan. However, in this instance, the overarching, adopted, development plan is out of date. The preparation of its replacement is underway.

- 5.14 Saved Policy S14 of the adopted Medway Local Plan identifies the long-term development potential of the site for uses including residential, in a comprehensive manner.
- 5.15 The policy was adopted prior to the designation of a significant part of HE's land as a SSSI. Accordingly, it has now been superseded by ecological and environmental constraints. Nevertheless, the policies acknowledgement that Homes England's land has been developed previously and can make a significant contribution to development needs in the future remains valid and merits further consideration in subsequent incarnations of the local policy.
- 5.16 We conclude that the specific reference and allocation of Homes England's land at Chattenden Barracks and Lodge Hill Camp for development in the Neighbourhood Plan, as outlined in Section 4, would not conflict with strategic policies of the adopted Local Plan, because these have long since been superseded by changes in circumstances.
- 5.17 In summary, we conclude that the emerging neighbourhood plan takes a positive and proactive approach to development. We maintain that with some appropriate modifications it can establish a robust framework against which planning applications, including for the redevelopment of Homes England's land at Lodge Hill, can be assessed. We would welcome the opportunity to work collaboratively with the Neighbourhood Planning Group to explore and develop the proposals for Homes England's land at Chattenden Barracks and Lodge Hill Camp in further detail.

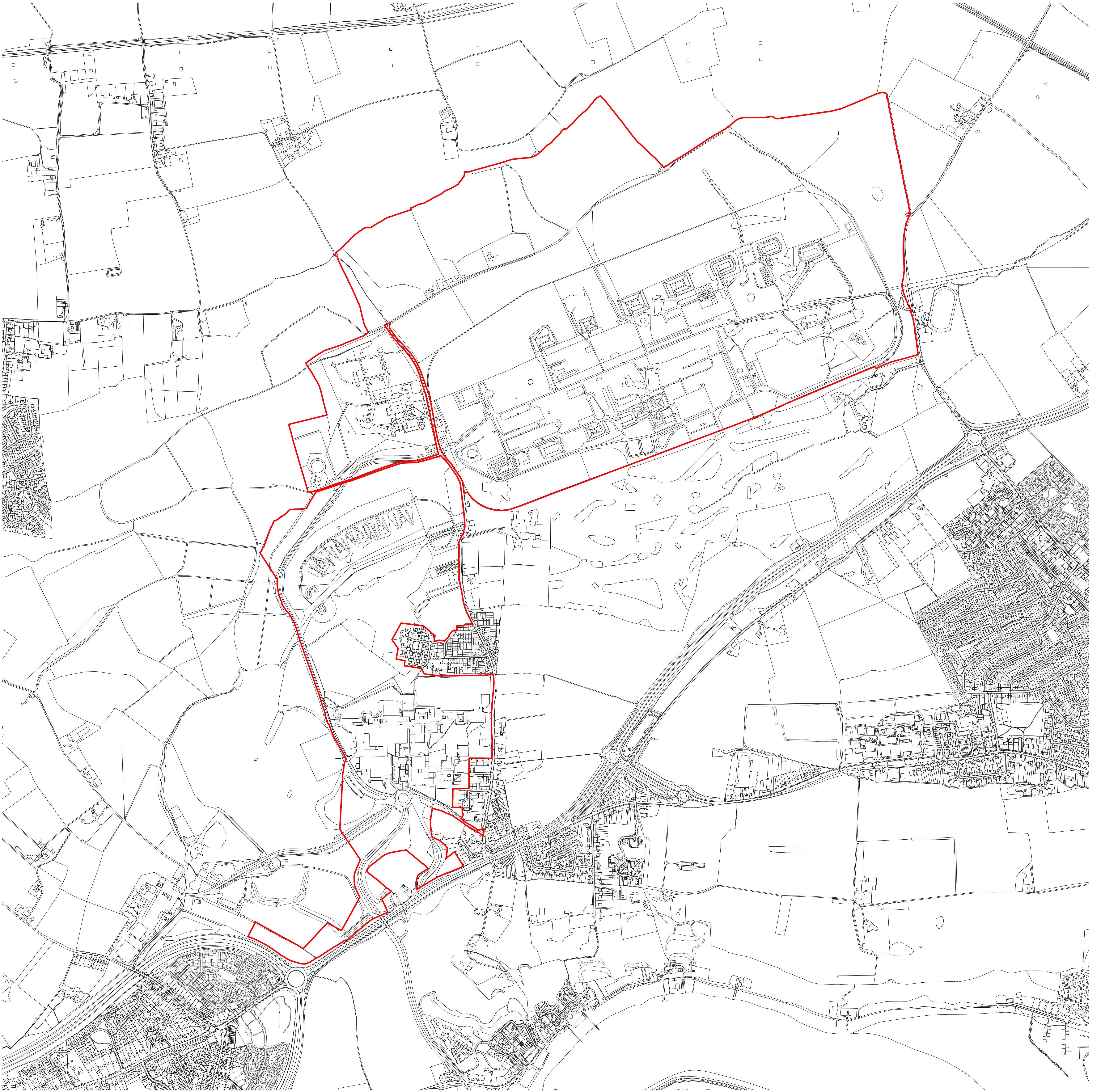
**Avison Young**

**February 2024**

# Appendix I

## Site Location Plan





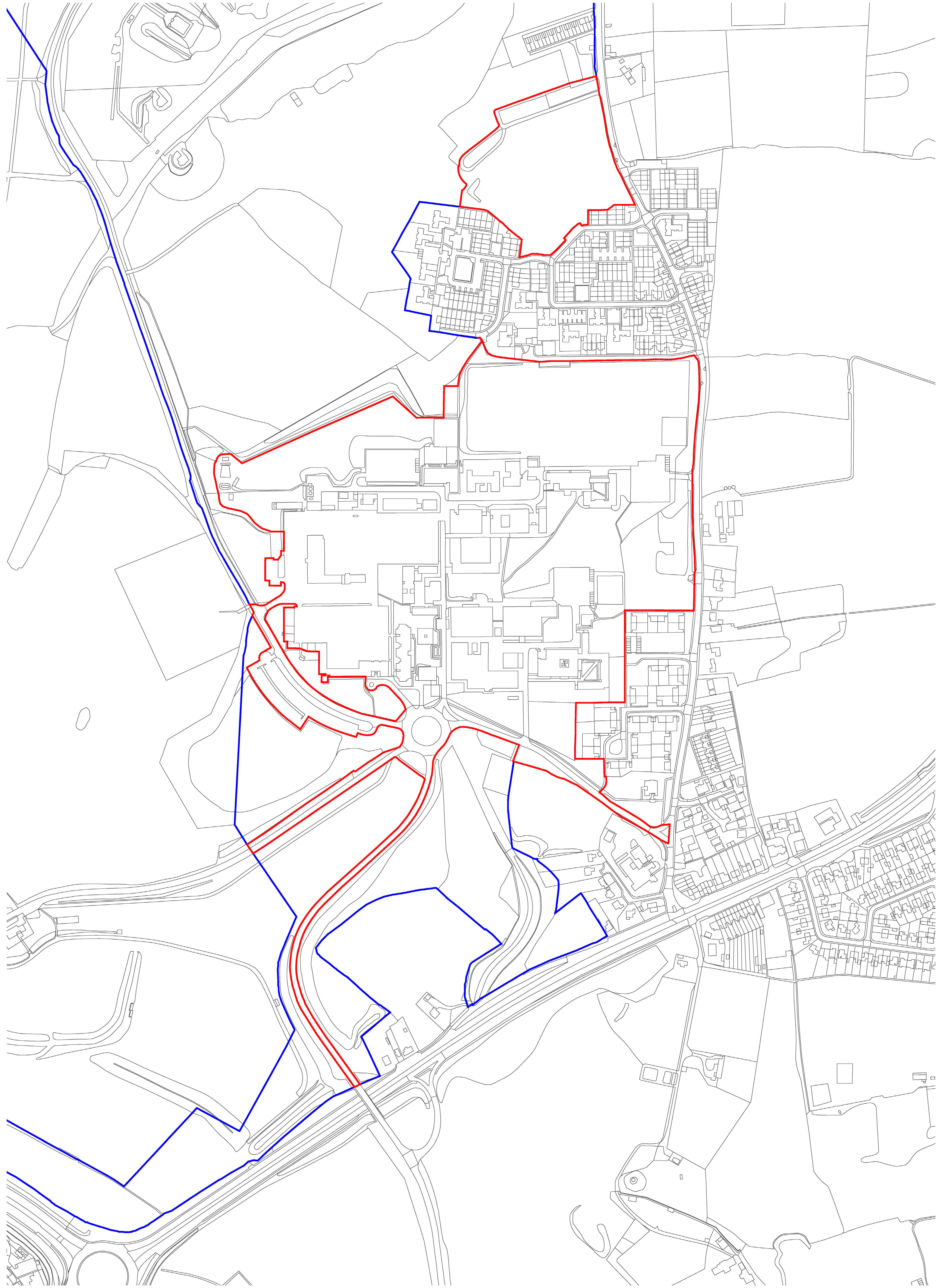
Map Key:  
— Site boundary



# Appendix II

## Chattenden Barracks

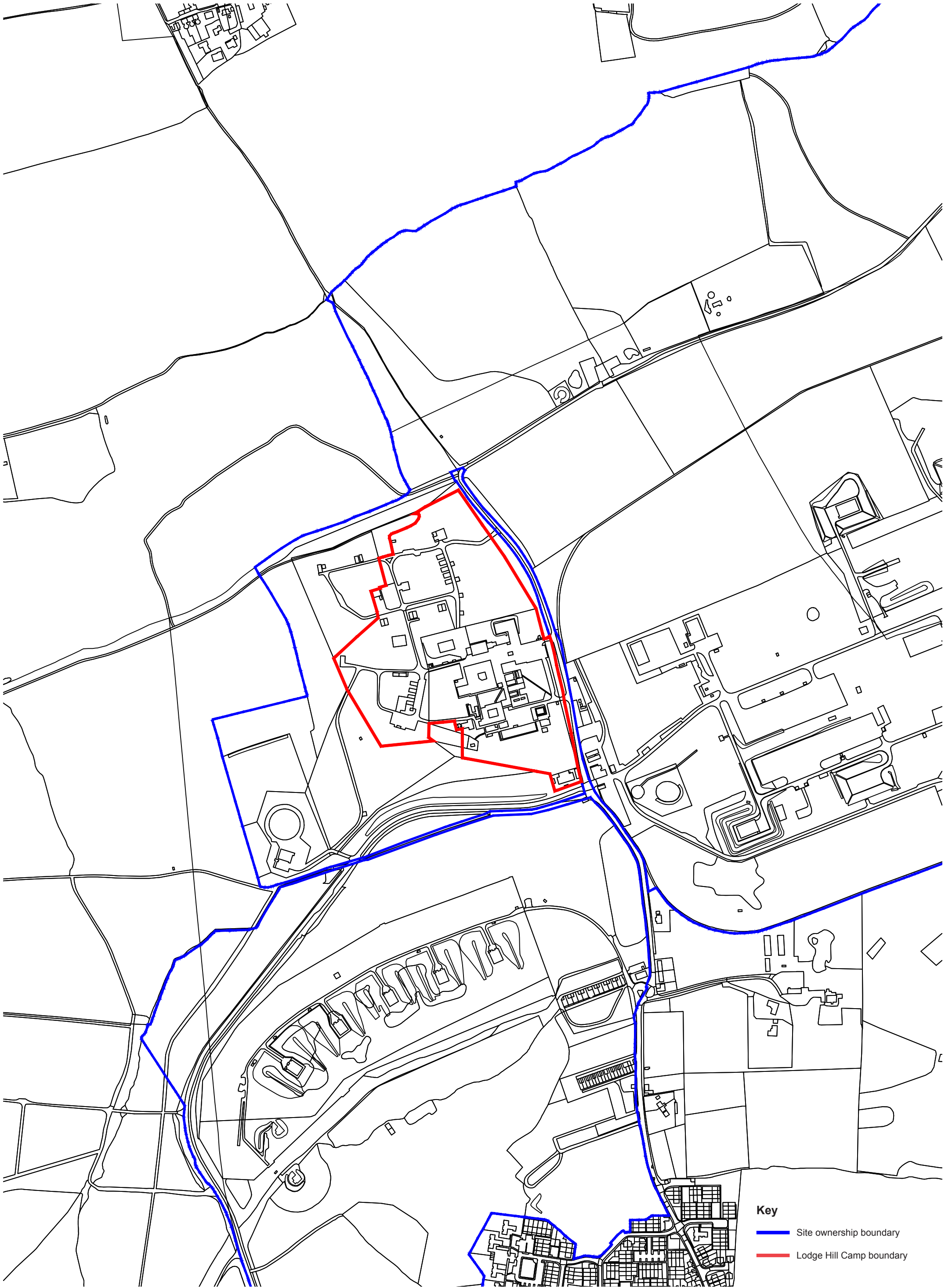






# Appendix III

## Lodge Hill Camp



**Key**

- Site ownership boundary
- Lodge Hill Camp boundary



0mm 100m 200m 300m

CDM REGULATIONS 2015 All current drawings and specifications for the project must be read in conjunction with the Designer's Hazard and Environment Assessment Record. All intellectual property rights reserved

Drawn GM  
Checked ST  
Date 12/08/2019  
Scale @ A3 1:5000

**LODGE HILL**  
**LODGE HILL CAMP**  
**LOCATION PLAN**

**AA6437 - SK28**  
**REV -**  
**FOR INFORMATION**

**PRP**

# Appendix IV Vision Document

An aerial photograph of a coastal town, likely in New Zealand, showing a harbor with a large ship, a smaller boat, and a lighthouse. The town is built on a hillside with green fields and some buildings. The sky is blue with some clouds.

# LODGE HILL

VISION DOCUMENT

OCTOBER 2023



This document has been prepared by Homes England’s consultant team comprising: PRP Architects and Masterplanners; Avison Young, Planning Consultants; and WSP, Technical and Environmental.



Ecology, Landscape, Heritage and  
Transport



Planning and Property Advisors



Masterplanning

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Carolina Ipes

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# Vision Statement

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***Homes England's vision is to transform Chattenden Barracks and Lodge Hill Camp to create high-quality places that respond to local needs, including the delivery of much needed new homes, which respects the historic use of the site and protects and enhances the local environment.***

---

The following objectives underpin the Vision that Homes England is bringing forward at Lodge Hill:

- **Regeneration:** Unlocking previously developed land on the former Military site, specifically at Chattenden Barracks and Lodge Hill Camp, and bringing it back into functional use. This will not only transform the individual parcels but will ensure they make a more positive contribution to the wider place, including Chattenden;
- **Nature:** Sensitively integrating the proposed development into the wider landscape being respectful of the surrounding nature designations;
- **Heritage:** Respecting and embracing the site's illustrious history as a former military site;
- **Social:** Improved social opportunities for both existing and future residents through provision of new affordable housing, small-scale retail space and job opportunities;
- **Connectivity:** Promoting connectivity with the wider area through additional pedestrian and vehicular routes within the sites and into the wider area; and,
- **Sustainable Community:** Creating two attractive new places, contributing to the vitality of Chattenden through the delivery of uses in response to local needs and which support healthy living and provide easy access to high quality green open space;

The following development opportunities are explained through this Vision Document and will enable an exciting transformation of previously developed land and the regeneration of the former military site to the benefit of the local area:

- **Chattenden Barracks:** Residential development of up to 500 homes alongside the former recreation ground which is identified for associated green space.
- **Lodge Hill Camp:** Promotion of land to provide a mix of uses that could include employment, residential, education and community uses.

This development opportunity set within Homes England's overall landholding at Lodge Hill will contribute to the delivery of a highly desirable sustainable community leaving a positive legacy for existing and future communities.

The vision, and objectives outlined above, are in the early stages of being embedded in the emerging masterplan which will be further developed with community and key stakeholder engagement to underpin future planning proposals. Homes England intend to increase the planning certainty of the sites, before securing a development partner to deliver these aspirations. Homes England have adopted this approach successfully on a number of schemes nationally.





Lodge Hill Camp

Lodge Hill Recreation Ground

Chattenden Barracks

Lochat Road

Kitchener Road

Chattenden Lane

Woodfield Way

A228 Peninsula Way

Upchat Road

Main Road

- Site Boundary
- Homes England site ownership

Plan 1: Site location





# Introduction

## PURPOSE OF THE DOCUMENT

This Vision Document has been prepared on behalf of Homes England in respect of its landownership at Lodge Hill, Chattenden on the Hoo Peninsula.

Homes England's ownership extends to approximately 325 hectares (ha) as shown on Plan 2 in page 8. Within Lodge Hill, two parcels are identified for redevelopment and so are the focus of this document. These are Chattenden Barracks and Lodge Hill Camp.

This document presents the Vision and emerging development proposals for these brownfield sites. This draws upon the extensive existing evidence base to ensure that the emerging proposals are robust and deliverable. It demonstrates that the redevelopment of these parcels will be well-designed and sustainable, responding to local development needs to make a positive contribution to the local community, whilst minimising the environmental impact.

This document has been prepared as part of Homes England's response to Medway Council's Regulation 18 consultation (September – October 2023). Homes England is pleased that the Land Availability Assessment (September 2023) identifies that both Chattenden Barracks, including land at Lodge Hill Recreation Ground, and Lodge Hill Camp will be taken forward for further consideration as potential allocations in the emerging Local Plan. This document provides additional detail to support Medway Council in this assessment, and makes a robust case that both parcels meet the requirements of the National Planning Policy Framework and should be allocated for development in the future Local Plan.

## THE VISION DOCUMENT:

- Includes an overview of the context and the surrounding local area, highlighting the key influences and opportunities.
- Presents the technical considerations for the site development focusing on; landscape and ecology, heritage, access, movement, infrastructure and utilities.
- Outlines the proposed development opportunities at Chattenden Barracks and Lodge Hill Camp.
- Sets out a concept framework to demonstrate how Chattenden Barracks could become a high-quality residential community with a distinct identity and strong sense of place.
- Presents a summary of the opportunities that both parcels offer for future development in line with the requirements of the NPPF.

An engagement programme will be developed to ensure that the local community along with other stakeholders are fully engaged moving forwards and have the opportunity to influence and shape the proposals at key stages of scheme evolution as the Council progresses the Local Plan proposals.

## ABOUT HOMES ENGLAND

As the Government's Housing and Regeneration Agency, Homes England's mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places that people are proud to call home.

Homes England's mission is underpinned by the following strategic objectives:

- Vibrant and successful places;
- Homes people need;
- A housing and regeneration sector that works for everyone;
- High-quality homes in well-designed places;
- Sustainable homes and places; and
- Corporate health.

These are further detailed in Homes England's Strategic Plan (2023 – 2028).

Homes England achieves its mission and strategic objectives through a range of mechanisms, for example through its investment programmes or through unlocking / de-risking land in its ownership for new development. It is therefore uniquely positioned to be able to bring forward new homes on brownfield sites such as these.

## BACKGROUND & HISTORY

The site was previously owned by the Ministry of Defence (MOD) who, following the site being identified as surplus to military use in Spring 2008, worked alongside Land Securities as Land Sale delivery Partner to submit an outline planning application in September 2011 for up to 5,000 homes and 47,500 sqm of 'other uses' including business, retail and ancillary uses (Ref MC/11/2516). The application was updated in February 2014 and Medway Council resolved to approve the application subject to referral to the Secretary of State as a departure from the Local Plan (September 2014). The application was subsequently withdrawn (September 2017).

The site was transferred to Homes England in early 2018. Since this time, Homes England has been working proactively to collate a robust evidence base to inform new development proposals. Recognising the important ecological merits of the site, the scale of development being progressed is substantially less than the original proposals promoted by DIO and Land Securities. The site have been included in various planning documents previously and further detail is provided on this elsewhere in this document. Homes England have continued to promote the site during the previous stages of the Medway Local Plan, Hoo Development Framework and various neighbourhood plans, particularly Hoo St Werburgh and Chattenden Neighbourhood Plan (July 2023).

## THE SITE & LAND PARCELS

Lodge Hill is situated on the Hoo Peninsula, to the north of the River Medway, Rochester and Chatman. A number of existing settlements are close to the site including Cliffe Woods, Chattenden, Hoo St. Werburgh, High Halstow and Wainscott. The site is situated to the north, west and southwest of the former Deangate Ridge Golf Course and extends east from Chattenden Lane to Dux Court Road. To the south, Chattenden Barracks extends to Kitchener Road, with other landholdings further south around Woodfield Way and Upchat Road.

The site was once a large area of Ministry of Defence land, operating as an ordnance depot and British army training camp. Lodge Hill comprises approximately 325 ha, of which approximately 24ha are proposed for development at Chattenden Barracks and around 9ha at Lodge Hill Camp.

### Chattenden Barracks and Lodge Hill Recreation Ground

The site of the former Chattenden Barracks was occupied from the 1870's to the 1980's, after which time the buildings (apart from an electricity substation) were demolished. The parcel is brownfield land, categorised with extensive hardstanding across the parcel. In addition, Lodge Hill Recreation Ground is a separate parcel of land that is located to the north of the existing Chattenden Estate. There is also a parcel of land made up of hardstanding located along Lochat Road to the south west of Chattenden Barracks.

### Lodge Hill Camp

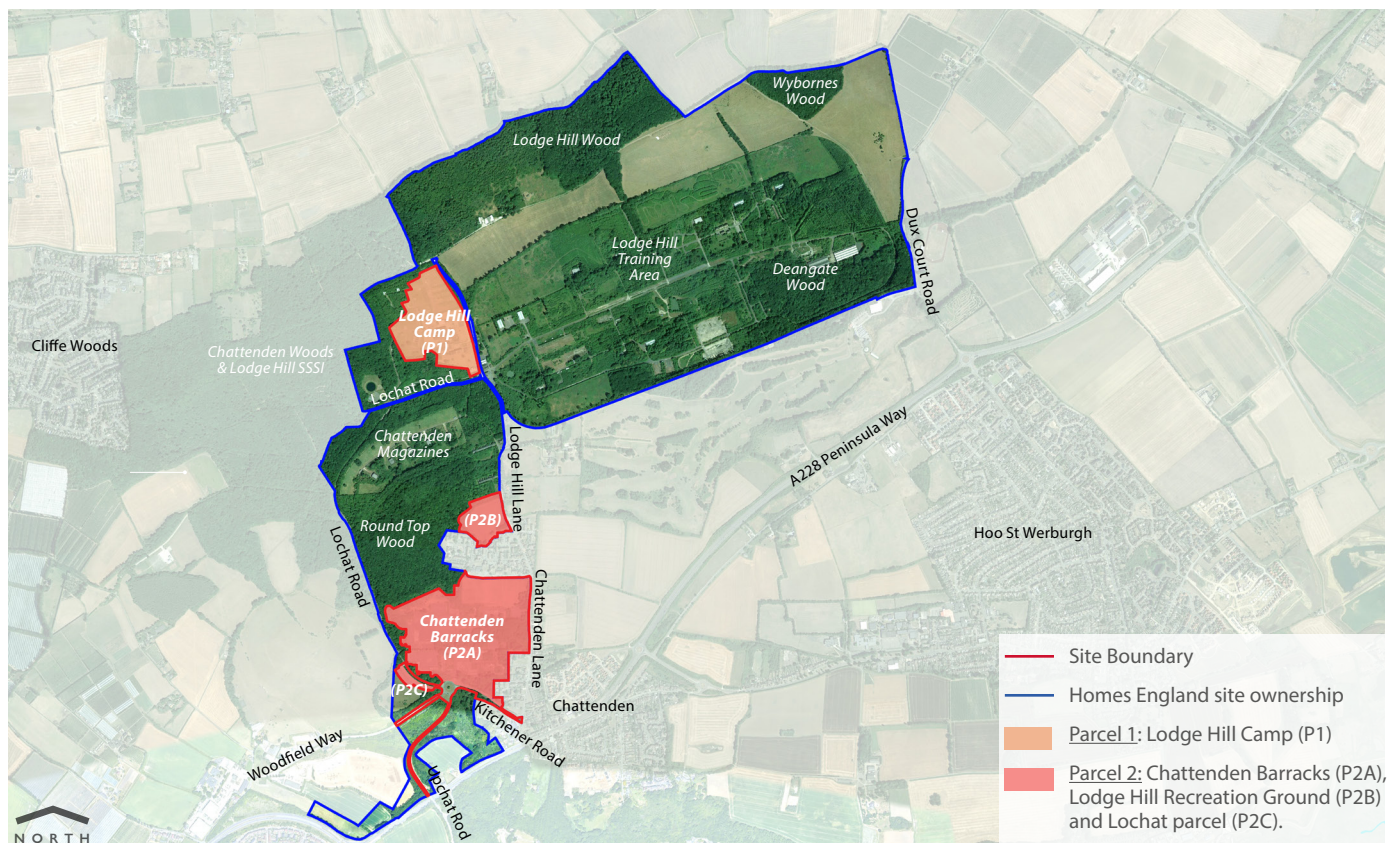
Lodge Hill Camp is located in the north-western part of the site, and is accessed via Lodge Hill Lane. The existing development in this area dates back to the inter war period, and includes an extensive network of buildings and structures of differing quality surrounded by paved parking areas and mown grass.



View of Lodge Hill Camp from Lodge Hill Lane.



Remaining concrete hardscape areas in Chattenden Barracks.



Plan 2: Lodge Hill Land Parcels.



# Understanding the wider context

## PLANNING CONTEXT

The scale of development at Lodge Hill previously considered in the adopted Local Plan adopted in May 2003 (Policy S14) is now not appropriate given the notification of Chattenden Woods and Lodge Hill SSSI. However, the adopted plan offers broad support for an appropriate scale of development on previously developed land. This objective is reiterated in Paragraph 85 of the National Planning Policy Framework (NPPF). Development at Chattenden Barracks and Lodge Hill Camp, two previously developed brownfield sites, would therefore be consistent with both national and local planning policy.

Medway Council's emerging evidence base and previous Regulation 18 version of the Local Plan indicates significant potential for development on the Hoo Peninsula including at Chattenden Barracks for residential development. The Draft Hoo Development Framework document (dated 22nd September 2022) set out the emerging framework for growth in the Hoo Peninsula, incorporating Chattenden Barracks.

The Site's strategic location offers opportunities to provide a sustainable new development for the Hoo Peninsula. The wider considerations include:

### • Strategic location & wider connectivity

The parcel is connected to the A228 at Four Elms Hill by Lodge Hill Lane and Lochat Road. The A228 is the main route to the Hoo peninsula, which connects with the A228 to London (via A2) and Strood at the Four Elms Hill roundabout.

There are two train stations within circa 3.5 miles from the site at Strood and Rochester. These provide access to a range of locations, including Rainham, Luton, London St Pancras and London Victoria.

There are several bus stops within 5 minutes' walk from the site along Chattenden Lane, within the recommended 400m distance. These offer connections to the nearest secondary school (Hundred of Hoo Academy in Cliffe via Service 601), and facilities, neighbourhoods and towns in the wider area (such as Chatham Bus Station, Rochester, Strood, and Wainscott via Service 173 and Upnor and Chatham via Service 197. The site is also surrounded by Public Rights of Ways (PROW) and National Cycle Network (CNN) routes which provide additional active travel means to access to surrounded natural assets and towns.

### • Land use & facilities

Residential uses are located adjacent to Chattenden Barracks. There is a residential neighbourhood to the north of the parcel whilst Chattenden village is just to the south within 5 minutes' walk from the parcel. Other larger villages, Wainscott and Hoo are within close proximity, approximately 5 minutes by car and 20 minutes by public transport.

Facilities around the site are limited to specifically the existing Chattenden Community Centre and Chattenden Primary school. Other facilities can be found in Chattenden village although these are also limited. However, the emerging Development Framework considers the location of a "potential hub for new services" close to the site along Chattenden Lane which could bring new opportunities for the development of this area.

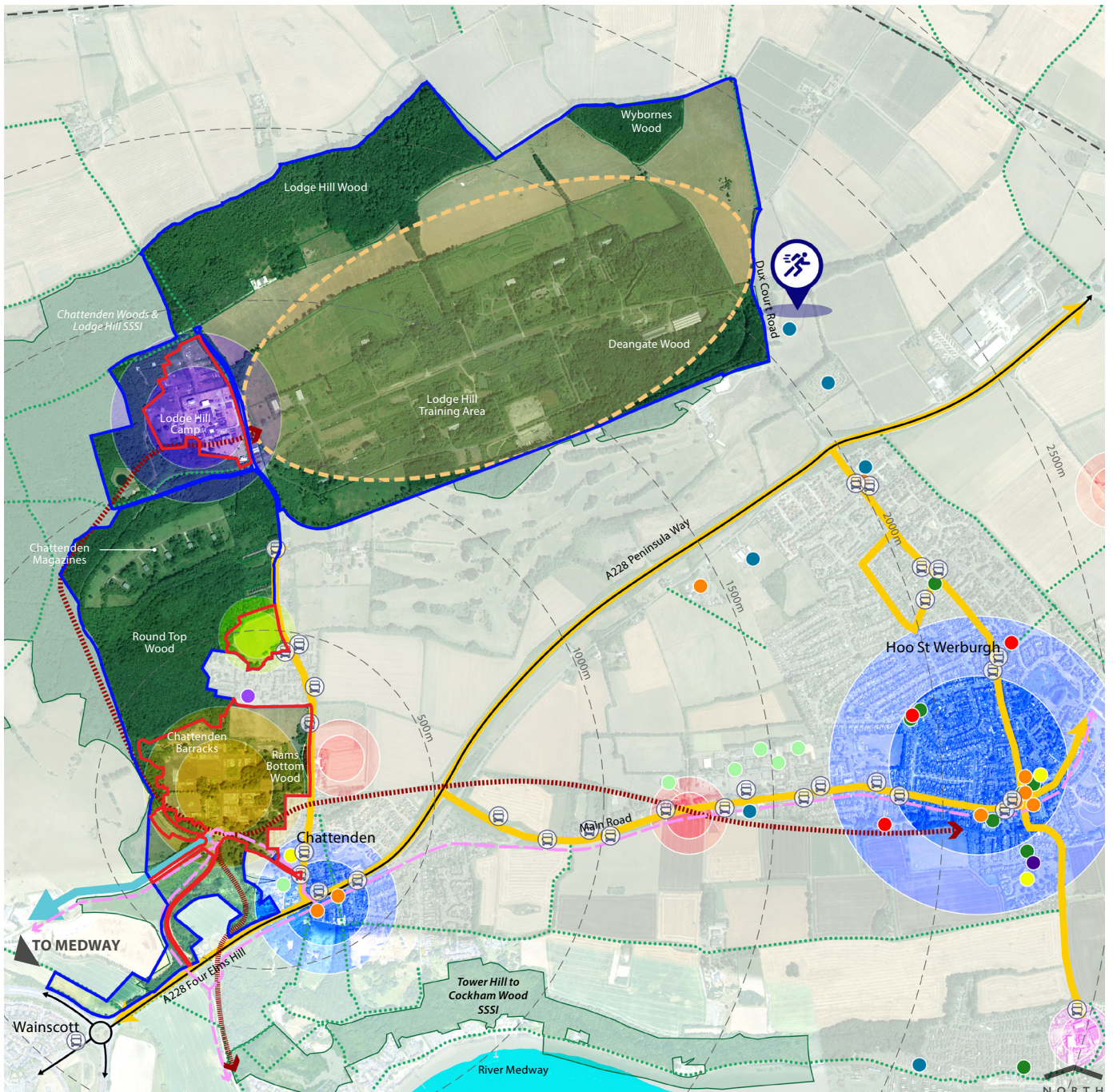
Chattenden Barrack's strategic location in an area close to existing villages and residential developments offers opportunities to provide a new residential neighbourhood that could improve the provision of facilities in the area for existing and new residents whilst also improving pedestrian access to these facilities.

Lodge Hill Camp could further contribute to growth in the area by providing opportunities through a range of uses including residential, employment, education and community.

### • Green network & heritage

Chattenden Barracks and Lodge Hill Camp are both surrounded by woodland and ecologically sensitive habitats recognised for their special scientific interest.

The history and heritage of both sites, including the pattern of the former streets and the Chattenden and Upnor Military Railway are rich assets that could inform future design proposals and bring back collective memories to the community. Therefore, development at these parcels is uniquely placed to protect the sites sensitive location, respect and enhance the military heritage whilst returning brownfield sites back into functional use to contribute to sustainable development on the Hoo Peninsula.



Plan 3: Lodge Hill site and the wider context.



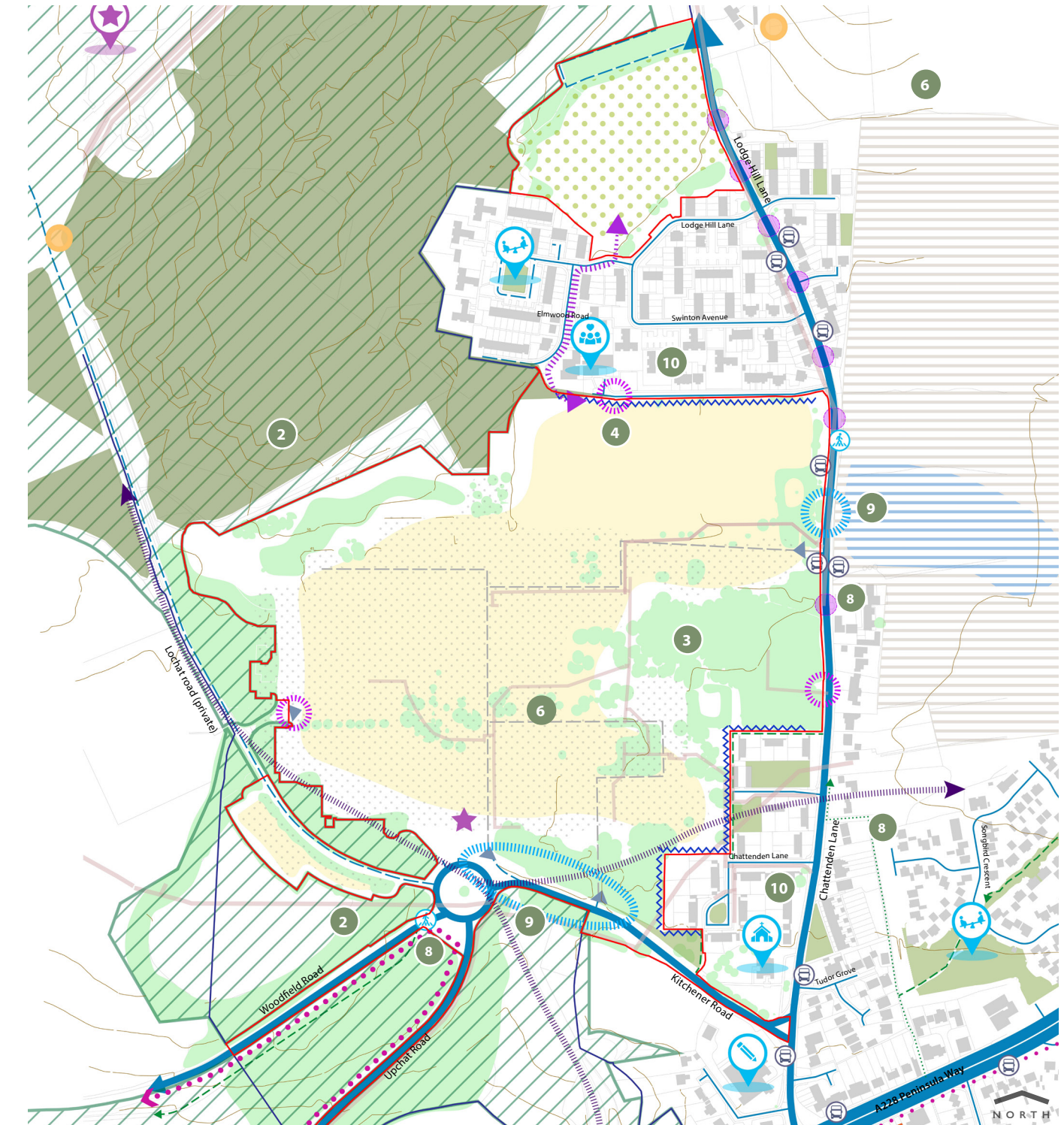
# Understanding the site: Chattenden Barracks

Having explored the wider site context, this section focuses specifically on the Chattenden Barracks development parcel and provides further detail on key influences and opportunities that will inform future development.

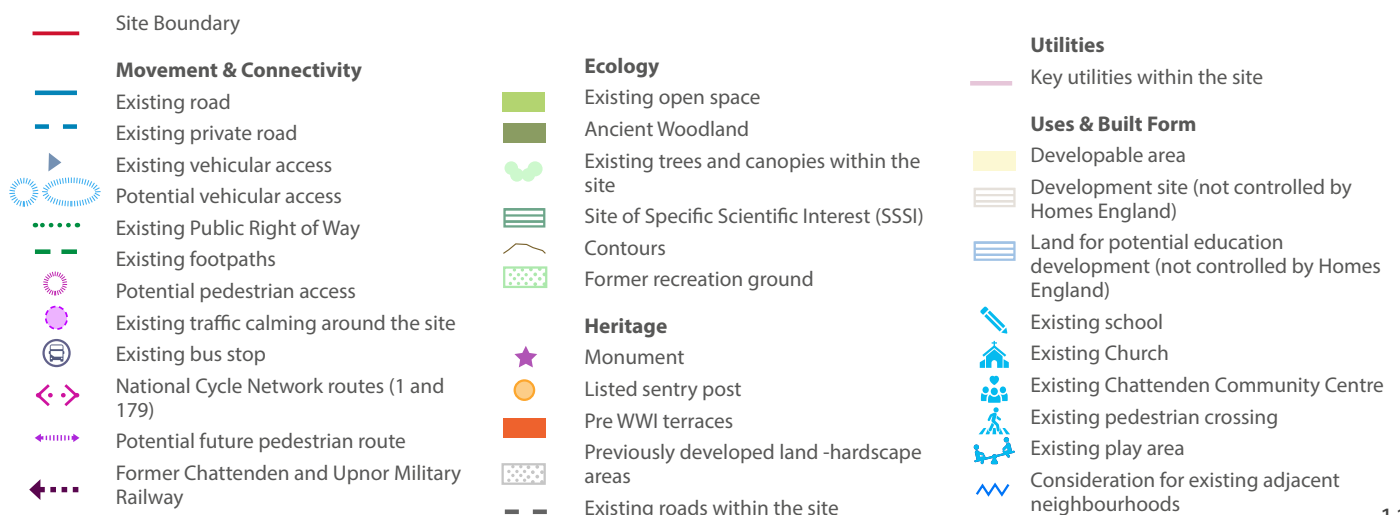
## KEY INFLUENCES & OPPORTUNITIES

This parcel offers incredible opportunities to provide a sustainable development in a strategic location. Some of the key influences and opportunities for Chattenden Barracks are summarised below:

- 1 Opportunity to provide a **sustainable new neighbourhood with much needed homes** in a strategically located **brownfield site**, with enhanced landscape green settings, close proximity to local facilities and access to sustainable modes of transport.
- 2 The influence provided through the surrounding **Ancient Woodland and SSSI**, particularly to the north and west of the site. Opportunity to create a **landscape-led neighbourhood with green spaces** that is influenced by these existing natural assets.
- 3 Consider the **existing trees on the site**, particularly around the eastern edge and the opportunity to integrate these into future design proposals.
- 4 The parcel is within walking distance to the existing Chattenden Community Centre.
- 5 Potential to incorporate **history and heritage** into future design proposals **reflecting the site's previous legacy**.
- 6 Consider the existing **topography and utilities**. The site slopes down from Round Top Wood towards the existing housing in the south eastern corner at a mellow gradient.
- 7 Opportunity to create **green streets through the site** offering green environments for pedestrians and cyclists promoting **health and well-being**.
- 8 Potential to **promote active travel**. The existing **pedestrian routes, Public Rights of Ways and cycle network** and how design proposals can **enhance connectivity through the site** and to the surrounding area. Appropriate number of **routes adjacent to the site** provide sustainable public transport access to the site and the surrounding area and towns.
- 9 Create/retain **vehicular access to the parcel** whilst minimising vehicular movement where possible and promoting walking and cycling.
- 10 Consider the **character and scale of the surrounding neighbourhoods** and how they relate to the site.



Plan 4: Chattenden Barracks, key influences and opportunities.





# Understanding the site: Lodge Hill Camp

Having explored the wider site context, this section focuses specifically on the Lodge Hill Camp development parcel and provides further detail on identifying key influences and opportunities that will inform future development.

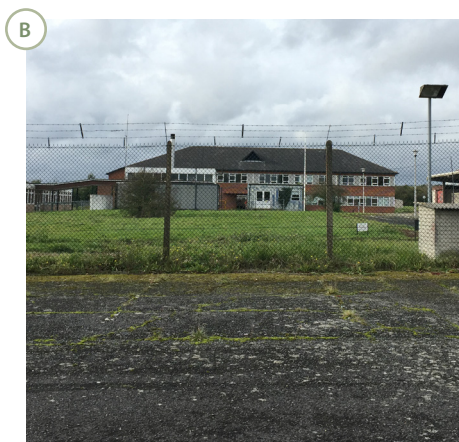
## KEY INFLUENCES & OPPORTUNITIES

This parcel offers a unique opportunity to deliver potentially both residential and non-residential uses. Some of the key influences and opportunities for Lodge Hill Camp are summarised below:

- 1 Opportunity to provide a **sustainable mixed use neighbourhood** that could provide opportunities for **employment, community, education and residential uses that will support and benefit the wider community.**
- 2 Incorporate **history and heritage** to the future design proposals through potential key design features in the landscape and / or buildings design.
- 3 Opportunity to **promote healthy lifestyles** by providing pedestrian and cycle safe street environments and encouraging walking and cycling.
- 4 Potential to **promote active travel**, with access to numerous Public Rights of Ways and to the **National Cycle Network routes** to the north west, and the proximity to a bus stop just 5 minutes' walk from the parcel.
- 5 Create a new neighbourhood with a **character and scale that responds positively to the surrounding context** and the countryside setting.
- 6 The outcome from continuing ecological surveys will assist in informing emerging masterplan proposals for the parcel and to identify what opportunities exist to **enhance existing green infrastructure.**



Former Museum building.

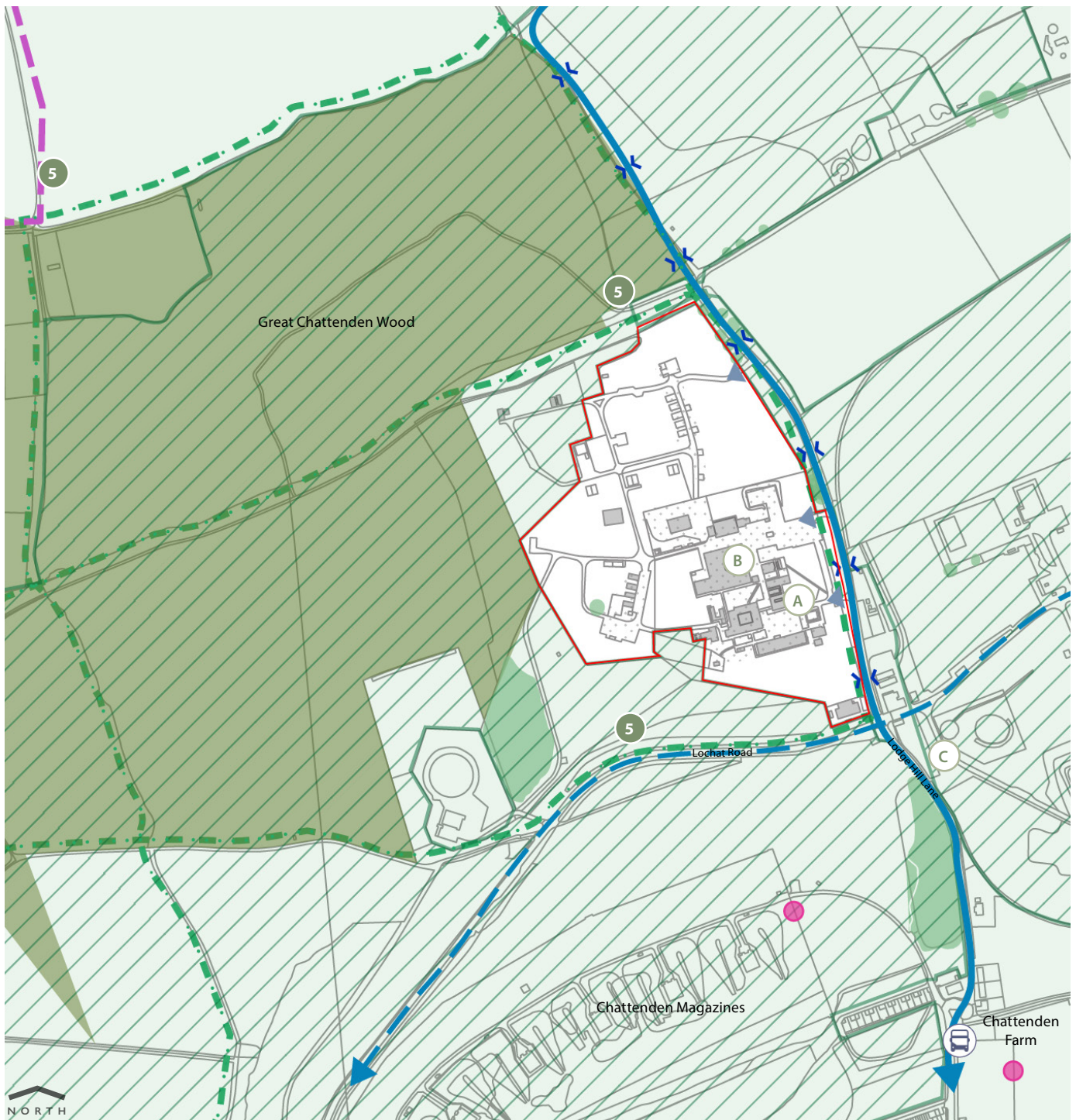


DEODS HQ Building.



Lodge Hill Camp from the south.





*Plan 5: Lodge Hill Camp, key influences and opportunities.*

- Site Boundary**

**Movement & Connectivity**

  - Existing site access points
  - Existing road
  - Private road
  - Existing Public Right of Way
  - Narrow width of Lodge Hill Lane
  - National Cycle Network route
  - Bus stop

**Ecology**

  - Ancient Woodland
  - Site of Special Scientific Interest (SSSI)
  - Existing trees

**Heritage & Built Form**

  - Listed building
  - Previously developed land
  - Existing buildings within the site

# Chattenden Barracks

## Technical & Environmental considerations

This section provides a summary of technical and environmental considerations that have been taken into account as part of the initial considerations for Chattenden Barracks. Ongoing technical work alongside feedback received from engagement events will be used to inform the design proposals as they develop. Nonetheless, it is important to highlight, that there are no overriding constraints that impact the suitability of Chattenden Barracks for residential-led development.

### ACCESS

There is existing vehicular and pedestrian access points into the Chattenden Barracks parcel.

There are existing vehicular entrances off both Chattenden Lane, located along the eastern boundary of the parcel, and also to the south adjacent to the roundabout at the bottom of Kitchener Road – both were utilised by the military during the MoD's occupation of the site. If these access points were to be brought back in regular use, infrastructure-wise, survey work has suggested limited upgrades would be required to enable them to be utilised as part of any a future residential redevelopment, depending on the wider access/movement arrangements.

The parcel is also being promoted on the basis in that Homes England owns Kitchener Road, the Agency is able to look at the possible creation of alternative access points off of that private highway. Any potential new access points emerging as part of future feasibility proposals would be designed in consultation with Highways Officers at Medway Council and would comply with the appropriate standards and be subject to highways safety audits.

Both access points identified can also act as pedestrian routes alongside the potential for additional pedestrian routes to the north and to the east of the parcel – any such pedestrian routes will be considered as part of wider assessment of connectivity to the surrounding Chattenden neighbourhood.

### CONNECTIVITY AND MOVEMENT

The site is located in close proximity to some existing local facilities, such as Chattenden Primary School and Chattenden Community Centre.

There are clear opportunities to promote increased use of walking and cycling in the immediate area along with improved access to public transport routes. Details of the existing bus connections are set out in the Wider Site Context section.

Further consideration will be given to the nature of the main street within the site at the appropriate stage, but it is recognised that it will need to be carefully designed to ensure that it is appropriate for residential development and that low vehicle speeds are encouraged. Opportunities for Active Travel will be carefully considered to ensure that there is effective pedestrian provision/connectivity and where appropriate cycle provision is provided. Pedestrian connections to the existing community centre and open space/recreation ground, along with direct connections to nearby bus stops will be key.

A future planning application for the site would be accompanied by a Transport Assessment that would consider the sustainable transport requirements and the impact of the development on the road network and the capacity and safety of access junctions. It would also give full consideration to any future planned infrastructure improvements at key junctions in and around the Hoo Peninsula. The application would also be accompanied by a Framework Travel Plan.

### LANDSCAPE, TREES & GREEN INFRASTRUCTURE

Initial landscape and visual work has been undertaken to inform the concept masterplan and will be developed further to inform the scheme evolution.

The site lies at the western end of the Hoo Farmland landscape character area (LCA) and is described in Medway's LCA (2011) as being "well contained and screened". The Hoo Landscape Sensitivity and Capacity Study (2019) concludes that the Visual Sensitivity is Medium and the Landscape Sensitivity is Medium with no rare landscape elements or conservation interests of note.

Discussions with Medway Council's Landscape Officer have confirmed agreement that the site is currently well contained and screened and highlighted the importance of the relationship of new development to the existing woodland ridge to the north. Consideration of how existing landscape should be treated, particularly along the western, south-western and north-eastern edges of the site is also important.

Landscape proposals will be integrated with potential ecological enhancements and sustainable drainage features throughout the site. The scheme may have the potential to achieve Building with Nature accreditation.

Consideration will be given as to how the proposals for Chattenden Barracks and Lodge Hill Camp can help to meet the identified key priorities for the Hoo Peninsula as set out in the Medway Green and Blue Infrastructure Framework

(Consultation Draft October 2021). This includes priorities relating to habitat enhancement, improved access to managed green space and improved access to heritage features where possible.

Some initial tree assessment work has been undertaken to review the conditions of existing tree coverage across the parcel. Further assessment will inform a retention / removal strategy to best inform development across the parcel. The existing tree cover and in particular groups of trees and woodland within the Chattenden Barracks site provide an excellent opportunity to create new homes within this mature landscape setting, offering screening and enclosure, benefits of well-being associated with nature for future residents and air quality benefits. There may be potential to enhance tree planting in certain locations and in other areas, some lower quality trees may be removed to create opportunities for footpaths, play and sustainable drainage. Early assessment looks to potentially retain Rams Bottom Wood which could positively contribute to the future residential development. The latest Natural England and Forestry Commission Guidance on Ancient Woodland will be taken into account as the scheme develops to ensure protection of the Scheduled Ancient Woodland.

The Recreation Ground to the north of Chattenden Estate offers significant opportunities for retention and potentially some enhancement to create a high-quality and functional open green space for the benefit of the existing and new residents of the neighbourhood. Whilst there is informal public access to this area, it is considered that formalising access to an enhanced public open space would offer benefits to existing and future residents of Chattenden.

## ECOLOGY

Chattenden Barracks is situated adjacent to the Chattenden Woods and Lodge Hill SSSI, which is notified for its nightingale population, Ancient Woodland and neutral grassland.

Extensive survey work has been undertaken over a number of years to fully understand the ecological baseline of the Chattenden Barracks site and surrounding parts of the Homes England land ownership. As part of this, Homes England have engaged with Natural England regarding the scope of survey work that has included the following:

- Habitat classification surveys;
- Protected and notable species – including badger; great crested newt; bats; reptiles, dormouse and invertebrates.
- Breeding and Wintering birds; and
- Species-specific nightingale surveys.

The ecological work has informed Homes England's understanding of the measures that are likely to be required to ensure that direct and indirect impacts of proposed development on key species, such as nightingale and bats, are avoided and/or minimised, and that sensitive areas are protected. As part of future masterplanning there are potential features that are under consideration which may include:

- Landscaping between the development and SSSI / Ancient Woodland that is designed to guide people away from more sensitive areas;
- The creation of designated footpaths within Chattenden Barracks and immediate area to encourage enhanced pedestrian accessibility within the new neighbourhood;
- The creation of dedicated recreational public open space to encourage use of these specific areas;
- The integration of sensitive lighting solutions, particularly on the fringes of the SSSI boundaries in recognition of key bat corridors; and,
- Enhancement to fencing (where required and appropriate) will also play a key role in ensuring that the sensitive ecological areas in the vicinity of the site are protected.

All of these measures will be reviewed in light of further evidence that will emerge assessing the Cumulative Ecological Impact of wider development on the Hoo Peninsula which is being progressed by Medway Council.

An outline planning application for development will include the full suite of ecological survey results and appraisal (as part of an Environmental Impact Assessment) and will set out details of the proposals and how they minimise the impact on important ecological features and seek to deliver a high quality scheme along with Biodiversity Net Gain (BNG).

## BIODIVERSITY NET GAIN (BNG)

On-site opportunities to deliver Biodiversity Net Gain (BNG) will be considered, including the enhancement of retained semi-natural habitats, including on-site grassland and woodland; incorporating SUDS ponds as water body features; creation of brownfield or scrub/tree regeneration will be promoted in order to provide new natural habitats that would also act to help screen the SSSI from the road and residential development. There are opportunities to achieve BNG both within the site itself as well as on the wider Homes England landholding.



# Chattenden Barracks

## Technical & Environmental considerations

### HERITAGE

The wider Lodge Hill area has an important military heritage with listed sentry posts and an WWI anti-aircraft gun emplacement. With the exception of a small structure and a substation, there are no remaining buildings on the Chattenden Barracks following demolition of the original military buildings in the 1960's and demolition of the replacement barracks in 2005, but hardstanding remains present across the land parcel. Development of the Barracks site offers the opportunity to draw inspiration from the heritage of the wider Lodge Hill site and surrounding area.

Homes England is currently working as part of the Whose Hoo Heritage Lottery Fund bid which includes various groups within Medway and the peninsula. The focus of the bid is community, heritage and environment.

Some archaeological trial trenching has been undertaken on the site to understand the potential from the prehistoric period and a Written Scheme of Investigation (WSI) for further investigation has been agreed with Kent County Council. This will ensure that any findings of interest can be appropriately recorded and information made available to interested parties prior to development of the site.

### SUSTAINABLE DRAINAGE

Surface water catchments and existing outfall locations on the site have been identified. Along with the natural topography of the site and enquiries with Southern Water and the Lead Local Flood Authority regarding discharge rates, these have informed the surface water drainage options that are being developed and will feed into the masterplan development. Sustainable drainage features will form an important part of the green and blue infrastructure within the future site. It is proposed that surface water runoff from the SUDS features will discharge into existing watercourses, subject to the agreement of Medway Council. The approach to surface water drainage will ensure that surface water is managed on site without negatively impacting existing properties.

### UTILITIES

An assessment of the existing utilities on site has been undertaken and has informed the initial design work. Utilities within the site are shown on the Chattenden Barracks Influences Plan. There are no constraints to the proposed residential-led development, whilst there are existing easements for a medium pressure gas pipeline, public foul sewer and potable water supply mains in close proximity to the southern part of the site that will need to be maintained, it is anticipated these could be sensitively incorporated into the design with open space in this southern area. The 6m easement relating to the medium pressure gas pipeline (south of Kitchener Road) is being confirmed with the asset owner SGN.

There is an existing electricity substation located near to the southern part of the site which is redundant and will be removed as part of the future redevelopment.

Initial enquiries have been made with the Utility Companies regarding the capacity of utilities in the vicinity of the site to accommodate the proposed development. Further work will be undertaken at the appropriate stage to ensure that if upgrades are required, these are identified and planned early on to ensure that there is sufficient capacity to meet the needs of existing and new residents.

## LAND QUALITY/UXO

A Desk Based Phase 1 Land Quality Assessment (LQA) has been undertaken and the recommendations from this informed Phase 2 site investigations that have been completed at Chattenden Barracks. These considered both contaminated land and ground conditions. The key findings of this work are that there are some risks associated with asbestos and contaminants in shallow made ground.

The findings confirm that this parcel can be suitable for residential development after ground remediation works have taken place. These works are likely to include placement of a capping layer within residential gardens. Piled foundations may be required for heavy structures or those sensitive to settlement. Therefore ground conditions are not a constraint for the proposed redevelopment and remediation of this parcel will be beneficial for future generations.

Due to the previous military use, the site has also been subject to a level of Unexploded Ordnance (UXO) risk assessment. This identified a medium to high risk associated with air dropped bombs during WWII and also from the former military activities on the site. Areas of the site has been subject to ad-hoc UXO clearance. Subject to further specialist advice, UXO clearance will be undertaken where required. There are therefore no known issues at this stage that would prevent this parcel from being developed. Moreover, the development of the parcel offers the opportunity to ensure that it is fully cleared and remediated making it safe for future and existing residents of Chattenden.

# Chattenden Barracks

## The proposed development

### THE PROPOSED DEVELOPMENT

The high-level design concept presented in this section have considered collectively the current evidence base, the identification of key influences and opportunities, and the initial design principles set out in the Hoo Development Framework.

Development at Chattenden Barracks offers the creation of a high-quality residential-led scheme that integrates sensitively into the wider area and makes a positive contribution to Chattenden and the wider Hoo Peninsula. In line with Homes England's mission, it will be a place that people are proud to call home.

The proposed landscape-led concept masterplan considers:

- A **new sustainable neighbourhood** that will deliver up to **500 new high-quality homes** surrounded by green landscape, woodland and natural areas.
- A **range of different densities** that respond positively to the existing surroundings. Higher density is proposed to the gateways along Chattenden Lane and Kitchener Road; whilst lower density is proposed towards the woodland and ecological areas to the west.
- The potential **retention of existing tree cover at Rams Bottom Wood** as a natural open space, with incorporation of woodland play and footpaths to provide an alternate natural space away from the protected SSSI and Ancient Woodland.
- **Placemaking** incorporated into the design, creating **character areas, attractive frontages** to green spaces and assets, and providing feature houses to contribute to way-finding through the site.
- **Promoting active travel. New pedestrian and cycle routes** that improve connectivity throughout the site and wider area promoting **health and well-being and encouraging active lifestyles**.
- **Sensitively bringing people back to nature** by providing access to natural landscape, open spaces, and areas to exercise and play being cognisant of protected areas that could be affected by recreational pressures.
- New potential **direct pedestrian connectivity to the Chattenden Community Centre and the Recreation Ground**.
- **Celebrating heritage**. History embedded in the design, incorporating features within the landscape and houses design.
- The creation of a neighbourhood that responds to the **local character, scale and distinctiveness**.
- Provide **opportunities for service provision, such as a small retail shop (subject to demand and viability)** that could enhance provision for existing and future residents.
- **Enhancing the unique setting of the surrounding woodland areas**.
- **Creating new open spaces** with opportunities for food growing and spaces to gather promoting social interaction within the new community.



**Low density example image**, showing a mix of attached and detached houses (PRP scheme).



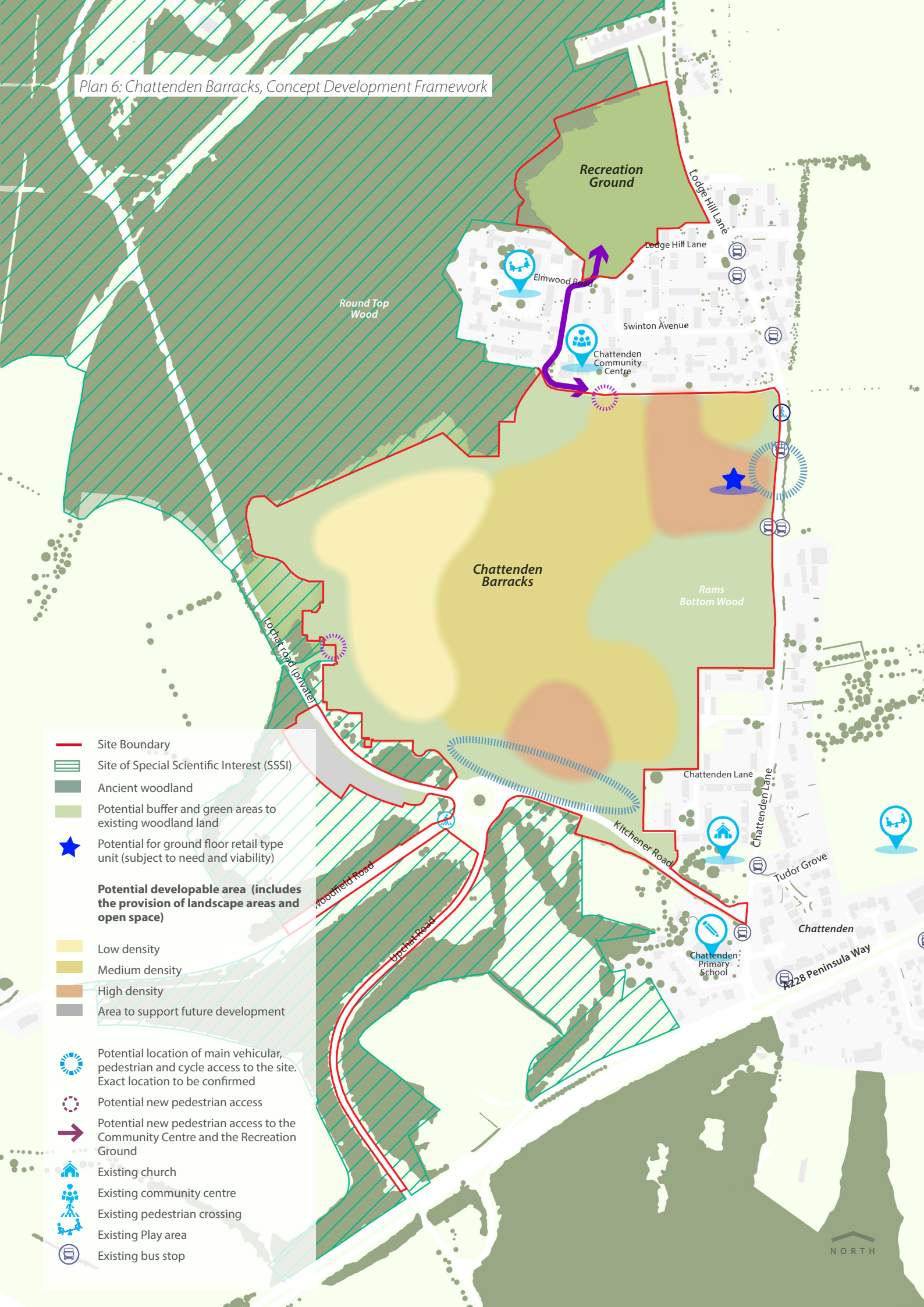
**Medium density image example**, showing a mix of attached and terrace houses (PRP scheme).



**High density image example** showing a mix of terrace houses and small blocks of flats (PRP scheme).



Plan 6: Chattenden Barracks, Concept Development Framework



- Site Boundary
- ▨ Site of Special Scientific Interest (SSSI)
- Ancient woodland
- Potential buffer and green areas to existing woodland land
- ★ Potential for ground floor retail type unit (subject to need and viability)
- Potential developable area (includes the provision of landscape areas and open space)**
  - Low density
  - Medium density
  - High density
  - Area to support future development
- ⊙ Potential location of main vehicular, pedestrian and cycle access to the site. Exact location to be confirmed
- ⊙ Potential new pedestrian access
- ➔ Potential new pedestrian access to the Community Centre and the Recreation Ground
- ⛪ Existing church
- 👥 Existing community centre
- 🚶 Existing pedestrian crossing
- 🎡 Existing Play area
- 🚌 Existing bus stop

NORTH

# Lodge Hill Camp

## Proposed Development

Lodge Hill Camp presents a unique opportunity and can complement development that comes forward at Chattenden Barracks as part of the overall Vision for Lodge Hill. A variety of uses are considered appropriate at Lodge Hill Camp based on technical work undertaken to date.

### DEVELOPMENT OPPORTUNITIES

Homes England is exploring the potential development options for Lodge Hill Camp. The site has a number of existing buildings of differing quality some of which have the potential for reuse. To maximise flexibility, the site is being promoted for redevelopment to provide a mix of uses that could include employment, residential, education and community development. Such uses have potential to create new jobs within the Hoo Peninsula in a variety of sectors (such as commercial, business, health and education). The consideration of the site for Residential (Class C2 and C3) and employment generating uses (B2 and B8) including Commercial, business and service (Class E), Learning and non-residential institution (Class F1), Local Community Use (Class F2) and Sui Generis would result in economic development on the Peninsula and contribute to achieving sustainable development.

Further investigation is required to determine whether the site will come forward for a single or mix of a range of identified uses in future.

The following is a summary of technical and environmental considerations that have been identified and considered in relation to the redevelopment of Lodge Hill Camp. Based on the work undertaken to date, there are no overriding constraints and the site is suitable for redevelopment.

### ACCESS

The existing vehicular access to Lodge Hill Camp is off Lodge Hill Lane, north of Lochat Road. Depending on the nature of the mix of uses proposed (including employment, education, community, residential, etc.), there exists the potential to utilise this access and undertake any improvements or upgrades that may be required to the site access or along Lodge Hill Lane.

### MOVEMENT

The parcel is close to a Public Right of Way and there is a footway along Lodge Hill Lane, providing active travel accessibility to/from the site for existing and new residents and visitors. A potential benefit to locating a mix of uses including employment, education and community-related uses in close proximity to new homes is that this could encourage less car use and the ability to use alternative modes of transport i.e. cycling.

### LANDSCAPE, TREES & GREEN INFRASTRUCTURE

The existing buildings at Lodge Hill Camp are well contained by woodland to the north and west and have limited visibility from the surrounding area. There are not considered to be any landscape constraints to the redevelopment of Lodge Hill Camp. Inclusion of existing trees within the proposed development offers opportunities to screen development and ensure that the redevelopment of Lodge Hill Camp forms part of the green infrastructure proposals, linked to the ecological habitat creation opportunities.



## **ECOLOGY**

Lodge Hill Camp is situated adjacent to Chattenden Woods and parts of the Chattenden Woods and Lodge Hill SSSI, and it is the intention that any redevelopment of the parcel would not encroach upon the notified areas abutting the parcel. Ecological survey work has been undertaken at Lodge Hill Camp and this has identified that protected species including bats and reptiles utilise the site and immediate vicinity. Redevelopment proposals for the site would be designed to minimise indirect impacts on ecological features.

## **BIODIVERSITY NET GAIN (BNG)**

Survey work has also identified that parts of Lodge Hill Camp beyond those areas identified for redevelopment have high potential for habitat creation/enhancement to provide Biodiversity Net Gain (BNG) associated with the proposed development of new homes at Chattenden Barracks, particularly the creation and enhancement of open mosaic and grassland/scrub mosaics which will benefit invertebrate assemblages and reptile populations.

## **HERITAGE**

The existence of military history across wider Lodge Hill remains present with a number of structures still located on the site. Lodge Hill Camp has a number of pillboxes, which formed part of the military defences scattered around the peninsula. Any redevelopment forthcoming within the area will respect and protect existing heritage features, and where appropriate draw on the site's military history for inspiration as part of the design of any future scheme.

## **SUSTAINABLE DRAINAGE**

A Flood Risk Assessment and Surface Water Drainage Strategy would be prepared for the redevelopment proposals to ensure that surface water is appropriately managed on site and to identify points of connection. A sustainable drainage system would be designed to work with the landscape and ecology of the site in accordance with best practice to facilitate development.

## **UTILITIES**

Information on existing utilities within Lodge Hill Camp will inform redevelopment proposals. There have been existing utilities such as electricity, gas and potable water serving the site from Lodge Hill Lane. There may be potential to re-use this infrastructure as part of the redevelopment proposals and any utilities not required would be capped off and isolated. There is an existing electricity substation on the site. Suitability for re-use of this would be confirmed with UKPN.

Enquiries would be made with the Utility Companies regarding the capacity of utilities in the vicinity of the site to accommodate the proposed development and to identify if any upgrades are required. There are no known constraints to redevelopment.

## **LAND QUALITY/UXO**

A Desk Based Phase 1 Land Quality Assessment (LQA) has been undertaken and the recommendations from this informed the Phase 2 site investigations that have been undertaken. These considered contaminated land and ground conditions and found that there is a moderate risk associated with asbestos and elevated concentrations of contaminants in shallow soils and made ground. Remediation measures appropriate to protecting the end users of this site would ensure that the site is suitable for re-use. There are no known issues at this stage that impact the suitability of the site for any of the land uses proposed and remediation works associated with redevelopment will ensure that the site is safe for future residents and/or occupiers.

Due to the previous military use, the site has also been subject to a level of Unexploded Ordnance (UXO) risk assessment. This identified a medium to high risk associated with air dropped bombs during WWII and also from the former military activities on the site. Areas of the site has been subject to ad-hoc UXO clearance. There is the potential for (where required) targeted UXO clearance to be undertaken. There are therefore no known issues at this stage that would prevent the site from being developed. Moreover, the redevelopment of the site offers the opportunity for targeted de-risking making it safe for future occupiers.

# Summary

## PROPOSED ALLOCATION

The proposals contained within this Vision Document demonstrate that the regeneration of Homes England's land at Lodge Hill, specifically development opportunities at Chattenden Barracks and Lodge Hill Camp, will make a positive contribution, not only, to meeting the development needs of Medway but also the vibrancy and sustainability of the wider area, including Chattenden.

This document clearly articulates the case for the allocation of the two development sites as follows:

- Land at Chattenden Barracks is promoted for residential development of up to 500 units alongside the former recreation ground which is identified for associated green space.
- Lodge Hill Camp is promoted for redevelopment to provide a mix of uses that could include employment, residential, education and community uses.

The redevelopment of these sites offers the opportunity to deliver high-quality, well-designed places that contribute to the vibrancy and vitality of Chattenden. It will also deliver sustainable homes and places, maximising their positive contribution to the natural environment and minimising their environmental impact.

The National Planning Policy Framework (September 2023) (NPPF) requires local authorities to prepare local planning policies that are aspirational but deliverable. In relation to "Identifying land for homes", the NPPF (Paragraph 68) states that:

*"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability."*

We note that for a site to be considered deliverable for housing they:

*"Should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years..."* (NPPF Page 67).

The above criteria have been used to consider the proposals for Chattenden Barracks and Lodge Hill Camp. These are outlined below:

## AVAILABLE NOW

Homes England is the sole landowner of Chattenden Barracks, Lodge Hill Recreation Ground and Lodge Hill Camp. It is the Agency's intention that they will be bought forward for development in the short term to meet local development needs, including the delivery of much-needed homes and associated community infrastructure.

## SUITABLE FOR DEVELOPMENT

In determining that both sites are suitable for redevelopment a number of factors have been considered, including Medway's growth strategy, the mix of uses proposed and site-specific influences.

Firstly, it is important to highlight that Medway Council have recognised that there is significant land for the potential development of homes, jobs and services on the Hoo Peninsula in the Regulation 18 consultation material (September 2023) and Hoo Development Framework consultation (September 2022). Moreover, the latter identifies Chattenden Barracks as a residential-led development opportunity.

Regarding uses, Chattenden Barracks is being promoted for up to 500 new homes. Not only does this align with the emerging planning policy, but the principle of the proposed use in the locality is considered acceptable given the nature of the surrounding area with existing settlements to the north and south-east.

In respect of Lodge Hill Camp, key to the successful reuse of the land is ensuring flexibility in the planning policies which relate to it. This land is suitable for a range of uses including but not limited to employment, residential, education and community use. It is also worth noting that the buildings on site could meet the requirements of a niche operator, the planning use of which might not fall neatly within the existing use classes.

In terms of site-specific considerations, both sites form part of the former MoD Chattenden site. This wider site has historically been developed and operated by the MoD for military use and provided accommodation for some employees stationed on the site. In line with the NPPF paragraphs 119 and 120, the brownfield nature of both sites contributes to their suitability for redevelopment.

Furthermore, Homes England has undertaken a significant amount of technical work that informs the suitability of the sites for development. This work covers, ground conditions, ecology, transport, heritage and an assessment of contamination (in particular unexploded ordnance (UXO)). This

Vision Document demonstrates that whilst these matters will influence the design of future development proposals, they do not impact the suitability and so both sites are considered suitable for the proposed development.

## ACHIEVABLE

This Vision Document, underpinned by a series of comprehensive technical assessments, demonstrates that the delivery of new homes and a mix of wider uses is achievable. Homes England supports and accelerates the delivery of housing led projects. The Agency has expertise and a track record in unlocking and delivering complex development sites, delivering infrastructure early and accelerating the provision of new homes. Whilst Homes England do not actually build homes directly, the Agency contracts with a variety of delivery partners from PLCs to SMEs under a Building Lease which provides greater control on pace of delivery, quality of new homes and innovative building technologies such as Modern Methods of Construction.

Homes England is uniquely placed to bring forward sustainable development at Lodge Hill and can deliver much needed housing in Medway. To further illustrate this, the following factors should be noted:

- Medway is a Council that faces challenging housing delivery targets. Planning policy requires that there is a step change in delivery and the emerging Local Plan will be the principal vehicle to deliver this radical change. Homes England, as the Government's Housing and Regeneration Agency, are seeking to develop up to 500 homes on Chattenden Barracks and a mix of uses, potentially including residential on Lodge Hill Camp. The delivery of these sites, including much needed affordable homes, could therefore make a material contribution to meeting the local housing need.
- Homes England has acquired Lodge Hill to ensure that, in line with historic planning policy, it is regenerated. Government policy is to make effective use of land in meeting the need for homes and other uses in line with Section 11 of the NPPF. Lodge Hill has been identified as a significant brownfield development opportunity for a number of years. The emerging vision and masterplan demonstrate that there is considerable opportunity to provide a well-designed, high-quality and sustainable development that minimises the impact on the local environment. The emerging Medway Local Plan, if it is to be "positively prepared" (NPPF paragraph 35), should provide a clear vision and strategy (supported by policy) for the regeneration of Lodge Hill.

- Lodge Hill has been identified as a significant brownfield development opportunity for a number of years. The emerging vision and masterplan demonstrates that in terms of place-making the development opportunities will provide a well-designed, high-quality and sustainable development that minimises the impact on the local environment. The emerging Medway Local Plan, if it is to be "positively prepared" (NPPF paragraph 35), must provide a clear vision and strategy (supported by policy) for the regeneration of Lodge Hill.

## SUMMARY

This Vision Document has been prepared in response to Medway Council's Regulation 18 Consultation (September – October 2023) in order to demonstrate that the regeneration of Homes England's land at Lodge Hill will make a positive contribution to meeting the development needs of Medway. It is intended to support Medway Council with the next stage of the further assessment of sites initially identified within the Land Availability Assessment.

The aspirational vision for the redevelopment of these two brownfield sites has informed the emerging design proposals and will underpin a future planning application, to ensure Homes England's ambitions are achieved. The allocation of these sites and subsequent redevelopment provides the opportunity to re-purpose brownfield land and bring it back into a meaningful use that makes a positive contribution to the wider place.

This Vision Document clearly demonstrates that both Chattenden Barracks and Lodge Hill Camp are available, suitable and achievable for development that will provide a mix of uses responding to local needs, including much-needed new homes. As a result, Homes England respectfully requests that the Council allocates both sites for development in the emerging Local Plan.

