

31 October 2023

Dear Sir/Madam,

Trenport Investments Limited (TIL) prepared these representations to Medway Council's ('the Council') Regulation 18 Local Plan consultation in relation to Land to the east and west of Church Street, Cliffe, Rochester ('the site'). TIL welcomes the first step by the Council in advancing a new Local Plan and for the opportunity to make comment on its contents.

TIL has supported the Council's plan-making process for over 20 years and remain of the view that a flexible, adaptable and dynamic Local Plan will assist the planning of the council in the future.

Background

TIL is a privately owned investment and development company with an active portfolio of property and development projects throughout the country. TIL own a large portfolio of land in Kent, including Medway, which includes land lying to the south, east and west of the village of Cliffe. TIL act as both a "master developer" securing planning permission, implementing all necessary strategic infrastructure and disposing of serviced land to housebuilders. TIL also has its own housebuilding subsidiary, Rosechurch Homes, such that it can directly deliver high quality new homes.

Current Development Proposals

TIL submitted an outline planning application in January 2022 (LPA Ref: MC/22/0254) at the Site for the following:

"Outline application with all matters reserved except for (access) for a residential development of up to 250 dwellings and a mixed-use community hub together with associated infrastructure including public open space and community facilities comprising a replacement sports ground and pavilion, with accesses from Church Street, Cooling Road and Buttway Lane."

We have enclosed the illustrative masterplan submitted with the application. The development proposals will deliver the following:

- Up to 250 new homes including 25% affordable housing.
- High quality design seeking to retain the existing character of the village.
- New accesses to the residential parcels.
- Highway improvements including an enhanced parking scheme along Cooling Road, Station Road and Church Street for existing residents
- Creation and enhancement of cycleway and footpath linkages throughout the development and beyond.
- Approximately 4.8ha of amenity green space and sports/recreation provision, exceeding the Council's standards.
- Creation of approximately 9.22ha of semi natural open space for recreation purposes.
- Total provision of all open space amounts to just over 14ha, which represents approximately 60% of the total site area.
- Provision of a community hub that will rejuvenate the local area.
- Replacement sports ground and pavilion as part of a package to relocate and enhance the existing sport facilities.
- Biodiversity net gain of greater than 20%.
- Improvements to local bus service.
- Provision of electrical charging points to all new properties, with some spaces available for the existing community.

- Provision of broadband access to enable easy access to local home delivery services and home working.
- Comprehensive Section 106 Agreement of financial contributions providing more than £2.5Million towards improvements to local services and facilities.

In terms of policy designations, the site is:

- Not subject to any national or local environmental designation.
- Not a designated habitat site or SSSI.
- Not Green Belt (or subject to any similar allocation).
- Not within an Area of Outstanding Natural Beauty, a “local green space” or identified as a “valued landscape”.
- Not a designated heritage assets or those of archaeological importance.
- Not in area at risk of flooding or increasing the risk of flooding elsewhere.

The Council’s planning officers recommended the application for approval, however, the council’s planning committee subsequently refused the application in October 2022 contrary to that advice and put forward four reasons for refusal.

TIL appealed the decision and Public Inquiry was held in May 2023. At the Inquiry, the Council withdrew their reasons for refusal stating in their Updated Statement of Case dated 22 May 2023 that:

“having carefully considered its position following the evidence heard in the first week of the inquiry. For the reasons which follow, the Council has decided that it is necessary to withdraw its reasons for refusal forthwith”.

The appeal is pending a decision.

Previous Representations

Representations were previously submitted on behalf of Blue Circle, as part of the preparation of the Medway Local Plan (2003) seeking the extension of the boundary of Cliffe to allow for the development of around 300 dwellings. The Local Plan Inspector did not agree at that time that the boundary should be altered but did comment that further development, as part of a planned village expansion, might help to sustain village services and could increase public transport in the longer run. The Inspector indicated that the possibility of allocating land around Cliffe could be considered in the next review of the local plan.

The adopted Local Plan identifies all the land as outside of the village boundary where Policy BNE25: Development in The Countryside seeks to limit development, excluding sites allocated for development, brownfield land and development which demands a countryside setting.

TIL have promoted the Site submitting representations to previous consultations including:

- Core Strategy and Housing and Mixed-Use Development Plan Document (2006)
- Medway Call for Sites (2008)
- Medway Call for Sites (2014)
- Regulation 18 Issues and Options Consultation (2016)
- Regulation 18 Development Options Consultation (2017)
- Regulation 18 Development Strategy Document (2018)
- Future Hoo – New Routes to Good Growth - Housing Infrastructure Fund Consultation (2021)
- Hoo Development Framework Consultation Draft (2022)

Comments on Regulation 18 Local Plan Consultation

The Regulation 18 Local Plan document sets out the framework for the area's growth up to 2040 and where and how new development can take place. Section 1.4 notes that this consultation does not detail policies or identify those sites preferred by the Council for new development and that detail will come in the next stage of work on the Local Plan. It also notes in Section 5.1 that the Local Plan will include a Policies Map which will show land allocated for new housing development. Notwithstanding the above, Map 3 on Page 22 of the Regulation 18 Local Plan provides an overview of potential sites for rural development. The Site is not included within Map 3.

Section 5.12 sets out that the housing needs for the Council over the plan period is 28,339 and figure 2 splits the potential sources for the supply into three categories - pipeline, windfall and allocations. Section 5.13 notes that there is an existing pipeline of sites for over 7,500 homes, the Site is likely not included as a pipeline site as it does not yet have planning permission. Therefore, unless the Site has been included as a windfall, the Site should be considered as an allocation.

Section 5.14 and 5.15 notes that the Council has produced a Land Availability Assessment (LAA) to review potential sources for allocation. The LAA identifies land with potential capacity for circa 38,200 homes of which many of these sites are subject to constraints including environmental considerations. Section 5.16 goes on to note that the LAA has identified four broad categories of locations where development could take place – Urban regeneration, suburban growth, rural development, green belt loss. In this context, the Site would be considered a rural development site. However, the Site is not included in Map 3 as a potential site for rural development and is therefore likely to have been excluded from the 14,736 homes in the rural development category of the 38,200 potential housing capacity set out in Table 1. As such, it is not clear if the Site is being considered as an allocation or any other category within the Regulation 18 Local Plan.

In addition, Section 5.39 of the document notes that most of the sites currently being promoted for housing led development are large scale with the potential to provide land for hundreds of homes. On this basis, the Site should be considered as it could provide up to 250 homes along with a number of benefits outlined above and is not the subject of any environmental constraints.

TIL seeks clarity on the status of the Site within the consultation document and emerging local plan. We would strongly recommend that the Site, which has been the subject of the scrutiny of a Public Inquiry where the Council withdrew their objections, is included on Map 3 in the next version of the Local Plan and any future iteration of the policies map in the Local Plan.

Summary

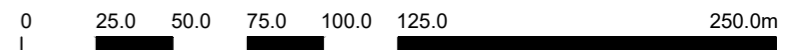
We trust that the enclosed is in order but if you do have any questions, please contact me on [REDACTED]

Yours sincerely,

Owen Weaver
Planning Manager – Trenport Investments Limited



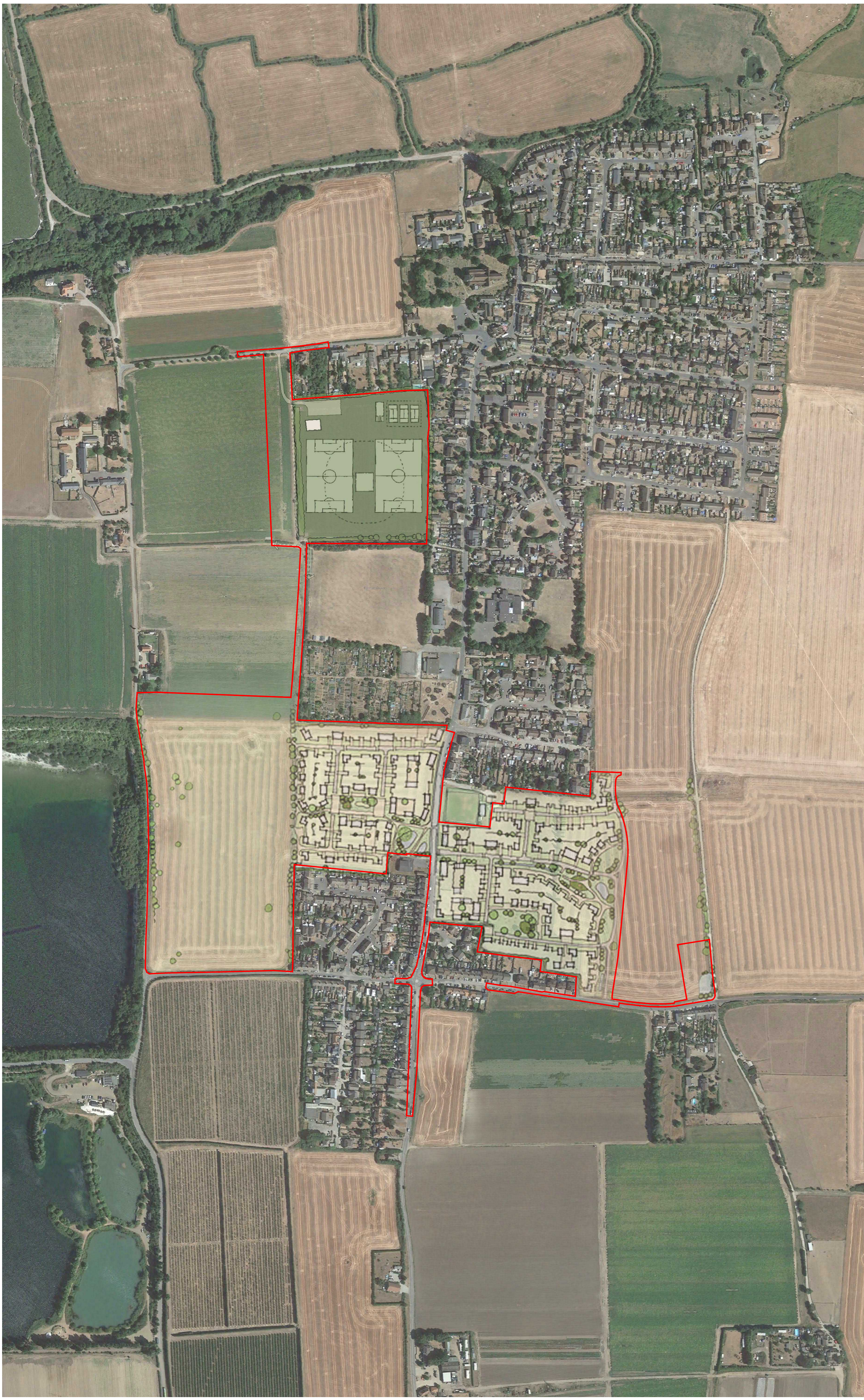
NOTES:



KEY

— Planning Application Boundary

Note:



Rev	Date	Drw	Chk	Notes
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INFORMATION

Client
TRENPORT INVESTMENTS LTD

Project
LAND AT CLIFFE

Drawing Title
ILLUSTRATIVE MASTERPLAN

Drawn	Checked	Paper	Scale	Date
RL	JT	A1	1:2500@A1	APR 2023

Project No.	Drawing No.	Revision
21122	0319	01

Corstorphine & Wright

Warwick
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velayutham, prem

From: [REDACTED]
Sent: 01 November 2023 08:56
To: futuremedway
Subject: Strategic Plan

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

I appreciate the deadline for comments on your plan was midnight on 31st October but I actually only heard about this yesterday so did not have time to set up an account and comment. I would have thought something so very important would have received a bit more publicity as most people I have spoken to knew nothing about it! Perhaps that was intentional

I am hoping given it is only a matter of a few hours late my comments may be included :

Housing- whilst I understand the central government requirement for new housing to be created, I think it is vitally important we do not keep building flats but include areas with large properties. My reasoning for this is, at present only really St Mary's Island (within the Chatham area at least) offers housing that would appeal to more 'affluent' families. Now this may sound 'snobby' but if you want Medway to be appealing it needs to be appealing to all members of a community otherwise it will become the 'starter area' and once residents are 'higher up' in their careers, they will simply move away. I would not choose to live anywhere else in Medway than St Mary's Island at present. Yes we need to accommodate first time buyers and those at the earlier stages of house buying but it is short sighted not to think of the other, higher end value part of the market. Building loads of flats in Chatham does not make it appealing to any one who does not want a flat.

Transport- all the case studies suggest public transport is important to the 'family' in the case study. This is simply not reflective of 'real life'. In today's environment people are multi tasking - for example public transport (or cycling!!) would not work with a commute to work via a drop off at a nursery and a drop off at a school. Very few people simply go from A to B with needing to go via C, D and sometimes E. It is just not practical to say walking, cycling or buses are the solution. A plan NEEDS to also take into account people need to use cars to go about their day to day lives. Otherwise let's all move to London where there is an extensive underground network with hop on/hop off style travel at frequent intervals. My school age children sometimes have to wait 30 minutes at Chatham bus station for a connection to St Mary's Island (and that only goes as far as Dockside followed by a walk in the dark) on their commute from Rochester. This is simply not the way of the future and hop on/off style transport is the only way of improving public transport links. However this must be in addition to (and not in lieu of) better routes for cars and car parking (particularly at key commuter stations where the current provision is very poor).

Infrastructure- this is currently at breaking point! The road route around Chatham and Rochester is shockingly bad for congestion- and red routes will do nothing to help as it is not parking/stopping that is the issue here. More importantly, healthcare provisions - and a new larger hospital- are absolutely vital if this plan is to be a success.

Diversity- as a person with friends from many countries, I am well aware of the importance of diversity. However, at present this does not exist! If I go to Chatham high Street for example I hear more foreign language spoken than English. Is this diverse? No. The sheer numbers of groups of foreign nationals means I feel like a minority in my own local town. Something needs to be done to readdress the balance. Streets full of Turkish barbers, Chinese nail bars etc are not the answer.

Thanks



Sent from my iPhone

Our Ref: DP13/2023/02B536836

31 October 2023

Future Medway
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Dear Sir / Madam

Medway Local Plan 2022 – 2040 | Regulation 18 Consultation

We write on behalf of our client, Turners Parks Group Ltd, who own and operate Allhallows Park, a residential park home site for older people (edged green on **Figure 1**), as well as the land immediately west (edged blue on Figure 1) which is currently being developed for 81 no. additional park homes, and the vacant land further west (indicatively edged red at Figure 1). The Park is located in the village of Allhallows-on-Sea on the Hoo Peninsula in Kent, around 500 metres from the coastline of the Thames Estuary as demonstrated by **Figure 2**.

Our client is grateful for the work that Medway Council has already undertaken to bring forward the Regulation 18 Consultation – Setting the Direction for Medway 2040 document in preparation for developing the Medway Local Plan (2022 – 2040) and shares the Council's commitment to Medway's growth as a healthy and diverse place to live and work and to delivering on its broader ambitions locally and more widely.

Against this background our client would like to take the opportunity to comment on the consultation document, so that their input may be considered by the Council in further detail and in due course reflected in the text and plans of the emerging Local Plan.



Figure 1 – Allhallows Park and adjacent land to the west

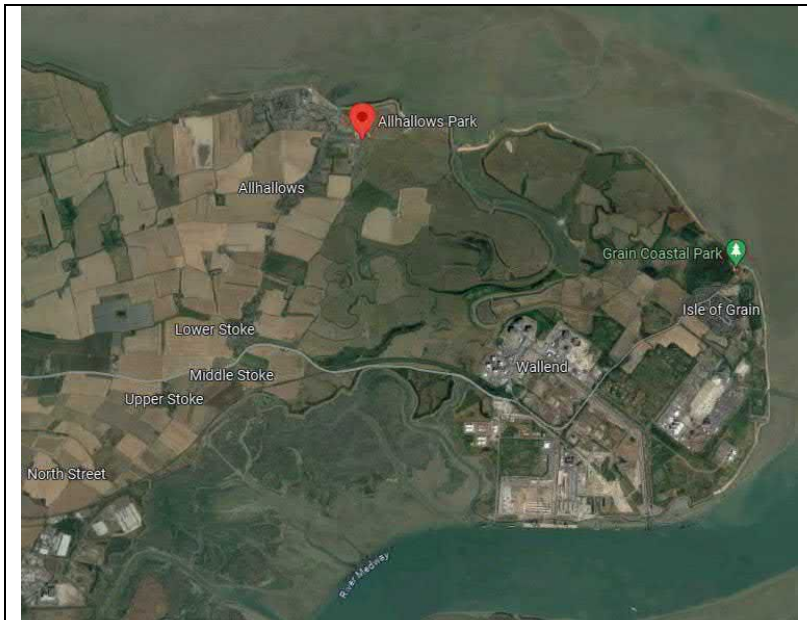


Figure 2 – Locational Context of Allhallows Park

Site History

Paragraph 5.5.36 of the current Medway Local Plan 2003 states that *'The Kingsmead Mobile Home Park, situated to the south of Avery Way, Allhallows, is a permanent mobile home park with the benefit of a full planning permission. The site has provided low-cost housing since 1961 and is quite different in character from the permanent housing at Allhallows itself'*. The following paragraph notes that park homes help provide affordable housing for a small, but significant, number of households.

Accordingly, it is apparent that Allhallows Park (formerly Kingsmead Park) has existed as a residential caravan park since at least 1961. Planning permission (**MC/2000/0097**) for the siting of four additional park homes was granted in 2000 and permission (**MC/16/1398**) for three further park homes was then granted in 2016. Both permissions were within the boundaries of the existing mobile home park.

Within the operator's current Park Rules for the site, Rule No. 12 states that *'No person under the age of 50 years may reside in a park home (with the exception of the park warden)'*.

In May 2019, planning permission (**MC/18/0288**) was granted in respect of the land immediately west of the existing mobile home park, which comprised part of Allhallows Golf Course, allowing the *'Change of use of land for siting of 81 park homes for the purpose of permanent residential accommodation by persons over 50 years old and associated amenity space and allotments, permissive footpath, new pond and alterations to existing pond'*. An extract from the Site Location Plan attached to the permission is shown at **Figure 3**. The remainder of the former Allhallows Golf Course, which now comprises vacant amenity land, lies immediately west of the red line area shown on Figure 3.

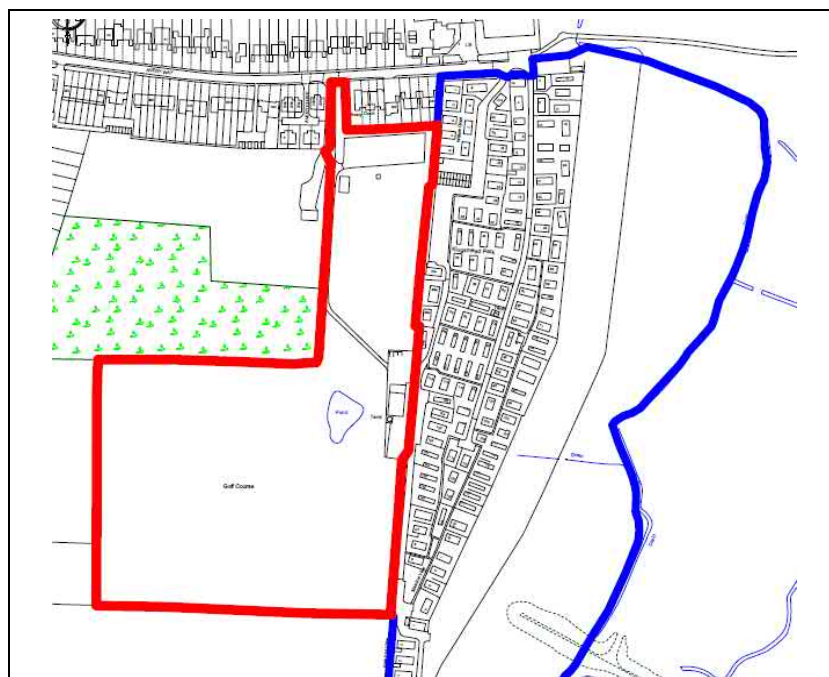


Figure 3 – Site Location Plan attached to MC/18/0288

Paragraph 2.7 - Context

Our client welcomes the statement that the supply of new housing is central to the new Local Plan, but that it is about more than just housing numbers, with the Plan seeking to improve the choice and mix of homes, drive up quality and to meet the needs of different sectors of the community.

Paragraph 3.1 – Vision for Medway in 2040

This section of the document sets out the vision that all sectors and ages of the community can find decent places to live, a sentiment which our client supports. Should the vacant amenity land west of the current Park be formally allocated for additional residential park home development, or if the emerging Local Plan otherwise introduces policy support for such development, this will only increase the level of housing choice available in the area helping to realise the Council's overarching vision.

Paragraph 4.2 - Supporting people to lead healthy lives and strengthening our communities

This paragraph indicates that one of the proposed objectives for the Plan is *'To provide for high quality energy efficient homes that meet the housing needs of Medway's communities, reflecting the range of sizes, types and affordability the area needs, including provision for specialist housing, such as... the elderly including those wanting to down size...'*

As such, it is apparent that a strategic priority for the emerging Local Plan will be to create a planning policy environment that enables the provision of affordable housing well suited to independent living older people including those looking to downsize and release larger family homes back into the market.

Single storey, accessible and adaptable park homes with a small garden and situated within a friendly mutually supportive community represent a low maintenance option particularly suited to older people, which is significantly cheaper than comparable brick-built bungalows with a small garden in the same housing market area. They provide an important source of affordable housing in the market forming a bridge between social housing and mainstream market housing, especially for those seeking to reduce their housing costs in older age.

The parcel of land immediately west of the existing Allhallows Park, comprising part of a former golf course, has been granted permission for the provision of 81 park homes. A significant opportunity remains, however, to provide further new park homes for the over-50s on the land further west which comprises the disused remainder of the former golf course.

This opportunity to deliver additional single storey, low-cost park homes for older people is particularly relevant given the identified local need for such dwellings over the next plan period and given the Council's lack of a five-year housing land supply accordingly to the latest published figures. It is noted that paragraph 5.3 of the consultation document confirms the identified housing need over the next plan period is 'greatly higher' than rates of housebuilding seen in Medway over the last three decades.

In line with the above-mentioned proposed local plan objective, which our client endorses, we suggest that the Council's current planning policy support for the retention of existing mobile home parks, as set out in Policy H12 of the Local Plan 2003, is expanded in scope to also support the provision of additional park homes within extensions to existing mobile home parks.

Section 5 – Developing a Spatial Strategy: Rural Development

As part of this consultation process, the Council has set out an overview of potential sites for Rural Development, with overall potential for development in rural areas that could provide capacity for 14,736 homes. An extract from Map 3 on Page 22 of the consultation document is shown at **Figure 4**, with the location of our client's land edged in red. This area of land was previously put forward as part of the Call for Sites process earlier this year, with the representation since considered and the site included within drawings in relation to 'Rural Development'. The existing Allhallows Park is located to the east (V-shaped site shaded grey on Figure 4), with the consented park home development on the former golf course located in-between.

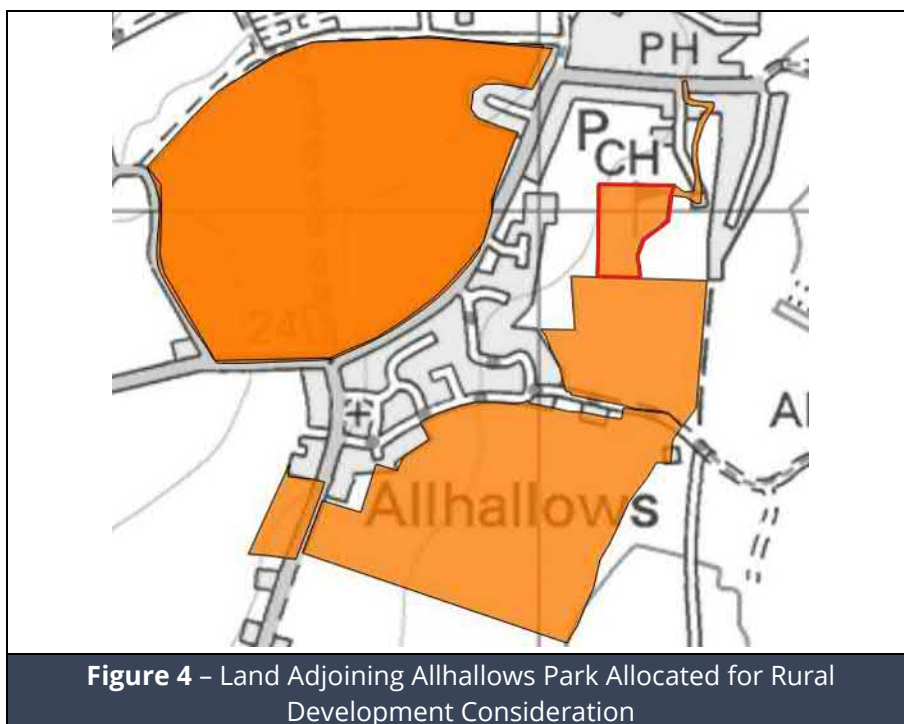


Figure 4 – Land Adjoining Allhallows Park Allocated for Rural Development Consideration

Allhallows Park has almost 150 plots across the site and the Site Rules require residents to be a minimum of 50 years of age. The former golf course site immediately west has been granted permission for a further 81 homes for persons aged over 50. Given the potential rural development site's (edged red on Figure 4) proximity to Allhallows-on-Sea village and to the two mobile home sites which already provide affordable, single storey park home accommodation, it should be seen to present a logical opportunity for siting additional park homes to continue to

address the housing needs of the older generation who might be seeking to downsize and in turn to release larger family homes back into the market.

It is acknowledged within the consultation document that most of the sites which have been put forward for potential development are promoted for housing-led development, each potentially providing land for hundreds of homes. However, in view of the proposed Local Plan objective discussed above, it is crucial to ensure that sufficient sites come forward and are offered policy support to meet the diverse housing needs of Medway's various communities and provide the necessary 'specialist' housing such as for the downsizing elderly, as would be the case with our client's land edged red on Figure 4.

Conclusion

Our client, like everyone connected with the wider Medway area, has a strong desire to see it thrive economically, environmentally, and socially over the plan period to 2040. It is the view of our client that Allhallows Park and the adjacent land to the west can be of particular assistance to Medway Council in meeting its ambitions to provide suitable housing for all sectors of the community. This is provided that emerging Local Plan policies continue to support the retention of the existing site, but also go further to introduce support for the improvement of the site and its expansion onto the adjacent vacant land.

We trust that our above comments and suggestions in relation to the Regulation 18 Consultation of the Local Plan will be fully considered and acted upon so that the emerging Local Plan is fully in accordance with adopted National Planning Policy whilst also contributing towards the Council's ambition of achieving sustainable residential development benefitting all parts of the community.

Should any further details be required, please do not hesitate to contact me directly using the details below.

Yours faithfully



Daniel Phillips MRTPI
Senior Planner | Place - Leisure



For and on behalf of Avison Young (UK) Limited

Medway Local Plan 2022-2040

Regulation 18 Consultation – Setting the Direction for Medway 2040

REPRESENTATIONS SUBMITTED BY

THE KENT SME DEVELOPERS NETWORK

October 2023



SME Developer Network
Kent

**MEDWAY COUNCIL
LOCAL PLAN 2022-2040
REGULATION 18 CONSULTATION- SETTING THE DIRECTION OF MEDWAY 2040**

**REPRESENTATIONS SUBMITTED BY
THE KENT SME DEVELOPERS NETWORK**

OCTOBER 2023



**SME Developer Network
Kent**

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APPENDIX 1 – The Role of SMEs

APPENDIX 2 – Small Sites Policy



1.0 INTRODUCTION

i) About the Kent SME Developers Network

- 1.1 These representations have been prepared by the Kent SME Developer Network (the Network) - a consortium of Small and Medium (SME) Developers who are located in or operate within Kent and Medway. The Group is currently chaired by Paul Henry, Managing Director of Esquire Developments, an SME Housebuilder based in Longfield near Dartford, Kent.
- 1.2 The Network was formed in November 2019 and presently comprises approximately 30 participants including SME Housebuilders and Developers (of varying size and scale) and Registered Providers. In addition, the Network includes representatives of Local Planning Authorities including Medway Council, Swale Borough Council, Tonbridge and Malling Borough Council, Tunbridge Wells Borough Council and Maidstone Borough Council. It is the intention that the Network grows over time to cover all of Kent including additional SME Developers and Local Planning Authorities and interested bodies.
- 1.3 The Network was set up to provide a platform for SMEs to discuss relevant planning and delivery issues associated with bringing forward smaller developments and to positively and proactively engage with Local Planning Authorities at the plan making and decision taking stages.
- 1.4 The Government has recognised the need to support existing SMEs and encourage more into the market in order to diversify the housing market from the volume housebuilders and generate choice and improve quality of homes being built. The Government has described SMEs as being of 'National Importance'. **Appendix 1** sets out the narrative behind the support and role for SME Housebuilders.
- 1.5 The Network meets on a quarterly basis to discuss and explore relevant SME related issues, including working through planning related matters. Notable attendees at past meetings including Steve Quartermain (prior to his retirement as Chief Planner at the then MHCLG) and Homes England.
- 1.6 In addition to the meetings acting as a discussion platform, the SME Network is also designed to act as a support and mentoring network, where land opportunities can be shared, or



knowledge/experiences drawn from in-house teams in order to help each other and strengthen the SMEs. The Network can also act as a collective voice in the preparation of Local Plans or other consultations - such as this.

1.7 The Network comprises the following:

SME Housebuilders and Developers

- Esquire Developments
- Fernham Homes
- Wealden Homes
- Fernfield Homes
- Meridian Construction
- Aile Homes
- King and Johnstone
- Clarkmores
- Clarendon Homes
- Gillcrest Group
- A&E Property Ltd
- Country House Homes
- Classicus Estates
- Woodcroft Developments
- Provectus Developments
- Penenden Heath Developments
- Grandera Homes
- Windmill Construction
- Jarvis Homes
- Aspire Designer Homes
- Kentish Projects
- Woolbro Homes
- Cooper and Cole
- Hillstone Homes
- RJC New Homes
- Wedgewood Homes
- TG Designer Homes



- Endeavour Construction Limited
- Unique Land

Registered Providers

- Hyde Housing
- MHS

Local Planning Authorities

- Medway Council
- Maidstone Borough Council
- Swale Borough Council
- Tunbridge Wells Borough Council
- Tonbridge and Malling Borough Council
- Dover District Council
- Folkestone District Council
- Canterbury City Council
- Kent County Council

Agents

- Tetlow King Planning
- David Hicken Associates
- Stantec

Others

- Homes England

1.8 The Network welcomes ongoing engagement with Medway Council and any other interested party.

1.9 For clarity, the representation contained in this response relate to the Members of the Network that are SME Housebuilders and Developers and not the Registered Providers, LPAs, Agents or Others.

ii) Content of Representations

1.10 These representations have been prepared by the Network which seek to address strategic matters and general observations relevant to SME Developers. Any site-specific matters will be addressed by individual SMEs within their own representations.



1.11 The representations are structured to respond to each relevant part of the consultation Document.

1.12 In summary the headline points are as follows:

- We query if the Local Plan timeframe is going to enable a 15 year plan period at the point of adoption (the plan will need to be adopted by 2025).
- The Regulation 18 document is extremely light on detail and supporting evidence base. This has limited the opportunity to provide meaningful comments and to help inform the next stage of the Local Plan. This is a pertinent point as the next stage of the Local Plan will be a Regulation 19 consultation - meaning the opportunity for the Council to make amendments prior to submission for Examination will be limited. Given Medway's track record of Local Plan failures, this seems an unnecessary risky strategy.
- We support the broad aims of the vision and objectives but note that 'housing' appears to be downplayed. Given the economic stimulus housing growth has on a local economy and that a number of other aims and objectives flow from housing, this should be placed higher on the agenda in the Local Plan .
- The lack of a LAA assessing each site submitted means it is difficult to comment on the suitability of each spatial strategy.
- We recommend a Regulation 18b Consultation is undertaken before a Regulation 19 stage is proceeded to.
- The level of windfall housing proposed (3,000) is substantial and query if this is appropriate. We note that under Paragraph 69 of the NPPF, there is a need to identify at least 2,900 dwellings on small sites.
- We note the housing requirements are ambitious but query the obvious and unnecessary 'political statement' contained in the document re. the suitability of the Standard Method to calculate housing need. This is current Government Guidance for plan making and a matter that other LPAs have been able to address successfully in their Local Plans. Medway Council is no different.
- There is a general lack of reference to SME housebuilders and how they can help achieve some of the wider objectives and aspirations. This includes climate change and good design – the latter point also being relatively downplayed in the



document – contrary to a central theme/message from Central Government about Building Beautiful.

- We encourage the Council to continue to work with the Network, including the provision of a small sites policy to help support SME developers within the plan period.



2.0 RESPONSE TO THE CONSULTATION DOCUMENT

General Observations

A. Lack of Detail

- 2.1 The Regulation 18 Document is 'light touch' and seeks to indicate a potential direction of growth. However, the document lacks any real or meaningful direction of growth and is lacking the necessary supporting Evidence Base to help understand the suitability of any direction of growth.
- 2.2 By way of example, the document offers 4No. development scenarios and throws 'every site into the ring'. Whilst this is a useful opportunity to understand the sites submitted, there are 2 key issues which mean that it is difficult to offer any meaningful comment:
- 1) No one strategy offers the ability to meet the identified level of growth required. Accordingly, a blended strategy is required. No such blended strategy is however put forward as an option.
 - 2) The lack of a LAA assessing the suitability of sites that underpin each strategy is a significant omission and means that it is impossible to conclude on the suitability of any given strategy. The Local Plan acknowledges that sites are likely to not be taken forward in the next iteration. This means the overall numbers associated with each strategy is incorrect and further uncertainty of the suitability of each strategy.
- 2.3 Whilst we recognise the intent of this document is to offer a direction of travel, the scarcity of any meaningful information is unfortunate and disappointing. A critical issue the Council should consider is that the next iteration of the Local Plan will be the Regulation 19 Consultation. This means that limited changes can be made from this document to the point of submission for examination and only changes relating to the soundness of the plan.
- 2.4 We consider there is a substantial risk to the Council's ability to progress with a sound plan by not providing sufficient evidence base now, or the identification of a preferred/blended strategy and will create a scenario where it seeks to make substantial changes post the Regulation 19 Consultation. Recent nearby LPA's have sought such changes (inc. Maidstone Borough and Tunbridge Wells Borough) only for the Inspectors examining those plans having

queried the suitability of such changes and if they relate to 'soundness' of the plan and if not, why the change is being proposed.

- 2.5 We therefore consider that Medway should undertake a Regulation 18b Consultation, which provides for the preferred strategy plus the alternative blended strategies and this is underpinned by a proper evidence base including a completed LAA, Sustainability Appraisal and Infrastructure Delivery Plan. This will strengthen the Regulation 19 Local Plan and will potentially avoid a protracted examination or potential re-consultation of key soundness matters.

B. Local Plan Time Period

- 2.6 We note the Local Plan has a plan period of 2022 to 2040 – a period of 18 years. However, the NPPF advises under para 22 that Strategic Policies should cover a minimum 15 year period from adoption (our emphasis). This means that in order to achieve the 15 year period, the plan must be adopted in 2025. Given the poor track record of adopting a Local Plan in the past and the length of time accrued since the previous withdrawal of the last local plan to get to this Regulation 18 stage, we question if a Plan will be in place by 2025.
- 2.7 The Local Plan acknowledges there are some fundamental strategic matters to resolve. This includes the highway issue of the M2 Junction, the impact of the Lower Thames Crossing as well as how local infrastructure is to be delivered (in the light of the HiF funding being withdrawn). These are all matters that need to be grappled with in combination with the identification of the preferred strategy and allocation of sites.
- 2.8 Given the political statements contained within the plan re. housing numbers and the pending General Election, coupled with the changes to the Planning System suggested by the current government in respect of Plan Making, there may be fundamental changes in Government Policy that affect the Plan making process. Whilst we are sympathetic towards the Council and the constant changes in Government messages are difficult to address for Local Plans, the fact is that these issues will inevitably have a knock on effect on the ability to bring forward a Local Plan to adoption in 2025 and the LPA should factor this into its consideration of the time period of the plan and work in a buffer scenario in the event of an adoption post 2025.



Specific Comments

A. Paragraph 2.7

2.9 We support Paragraph 2.7 and the recognition that housing delivery is more than just numbers and the right mix, choice and quality to meet the needs of the wider community are needed. SMEs are perfectly placed to meet these aspirations and therefore the more support the plan can give to SME's, the greater the opportunity that this objective can be met.

B. Paragraph 2.10

2.10 We note the reference to the HiF funding and the Council will need to seek the delivery of infrastructure in different ways. The SME Network would welcome continued engagement on this matter as the impact of viability is more acutely felt with SME developers. If there is an expectation that S106 contributions will be elevated to fund this infrastructure, the earlier this is known the better.

C. Vision of Medway - Paragraph 3.1

2.11 We support the broad visions as set out in paragraph 3.1 but note that reference to housing sits 6th on the list. Housing is the most critical part of the success of any Local Plan and includes a number of other objectives being met by it. Accordingly, we consider that housing delivery should be placed at the top of the visions as many other facets of the Local Plan flow from its delivery, including job provision, climate change, biodiversity net gain etc.

D. Strategic Objectives - Paragraph 4.2

2.12 We welcome the recognition that meeting high quality energy efficient homes has on people leading healthy lives. We consider this objective could be strengthened further by reference to good design. SMEs are well placed to deliver higher quality homes both in energy efficiency and good design and further reinforces that greater support for SMEs in the Local Plan can lead to the more effective delivery of other objectives.

E. Developing a Spatial Strategy – Paragraphs 5.3 to 5.5

- 2.13 Whilst we recognise the delivery of housing is an emotive topic and politically sensitive, we are unsure as to why the Local Plan sets out its position on the Standard Method in paragraph 5.3 and 5.4 in the way that it does. The paragraph appears to a politicised statement questioning the validity of the Standard Method approach. The Standard Method is the current guidance and the starting point for assessing housing need. Reference is made that this method is ‘heavily criticised across the country’ albeit it does not substantiate by who or when and why.
- 2.14 It is noted that the Standard Method is a position in which other LPAs have successfully addressed in their emerging Local Plans. Medway is no different and should be ambitious in seeking to rise to the challenge of meeting its identified housing needs – rather than bemoan about the target itself.
- 2.15 We further note that the Local Plan has been brought forward by the new Labour administration in Medway. Notwithstanding the outcome of the General Election next year, it is noted that at the recent Labour Political Party Conference, the Labour leader Kier Starmer has reaffirmed Labour’s commitment to housebuilding and getting ‘Britain Building again’. This included confirmation of building 1.5 million more homes across the country within five years of a Labour Government. There is no suggestion at present that there is to be any down turn on the level of housebuilding expected to be delivered in the Country in the foreseeable future and therefore Medway should continue to plan under the Standard Method and be ambitious and embrace growth.
- 2.16 We note the Medway Growth Outcomes 2021-2037 demographic scenarios (Figure 1) but this also reflects the substantial under delivery of housing in Medway - which has been consistent now for a number of generations. This has had a negative impact on affordability ratios and stymied longer term growth in Medway. The Council should therefore be embracing the housing targets and seeking to understand how they can be used to good effect – such as delivering greater levels of employment, healthy communities and potentially assisting in meeting wider infrastructure objectives.
- 2.17 It is noted that infrastructure delivery is high on the agenda in Medway and is seeking to resolve existing issues, not just those that may be worsened by future development.

Accordingly, there is a case that the greater number of homes delivered will yield a greater capital receipt to fund and deliver these projects. Fewer homes results in fewer opportunities and will not resolve existing issues and could bring into questions the viability and deliverability of future infrastructure projects.

F. Paragraph 5.11

- 2.18 The Council should consider carefully the ability to meet Gravesham’s housing need and fully understand why Gravesham cannot meet its own needs. Whilst cross boundary working is encouraged, Medway’s housing target is substantial and ambitious in its own right. Therefore evidence needs to be demonstrated within the duty to cooperate why Gravesham cannot meet its own housing requirement and similarly what requests Medway has made of its neighbouring LPAs i.e. Gravesham, TMBC, Maidstone and Swale regarding helping meet their housing needs.

G. Paragraphs 5.12 to 5.15

- 2.19 We note the planned housing target of 29,000 dwellings from 2022-2040. As required by Paragraph 69 of the NPPF, 10% of the housing target should be made up of small sites on 1ha or less. This equates to a figure of 2,900 dwellings required to be identified on small sites.
- 2.20 This is a large target, but with collaborative working with the SME Network, the right sites and opportunities can be located. Crucially this means that in assessing sites in the LAA, that these sites are not ‘screened out’ at this stage and accordingly a qualitative exercise needs to be undertaken at this point in the Evidence Base analysis.
- 2.21 This is a critical issue and is the primary reason why the Network considers insufficient small sites are allocated in Local Plans. It is because the SA process and the LAA process, through a ‘tick box’ exercise of proximity of services and facilities, often renders smaller sites in ‘less sustainable’ (note not unsustainable) locations to be discounted at this early stage. From that point onwards it is extremely difficult to promote the site any further through the local plan.
- 2.22 We consider that the Council needs to take a proactive and pragmatic approach to how it is assessing small sites, recognising that a blended strategy is likely to be required and that allocating small amounts of growth in some of the more rural locations will actually result in

a benefit to that location, and not seen as unacceptable due to sustainability reasons. The reality is that in Medway, there are very few locations which are deemed wholly unsustainable to the extent that they cannot access day to day services within short trips - whether that be by public transport or the private car. The Council should therefore be open minded when it comes to small sites in rural areas – which are typically being promoted by SMEs.

- 2.23 Indeed we recommend that the Council’s starting place in identifying sites to meet its housing need should start with the 2,900 dwellings being allocated on small sites, and then subsequent allocations on larger sites.

H. Potential Strategies

- 2.24 The Network does not offer comment on a preferred strategy due to the wider interests of the group. However, it is observed that no one strategy delivers a sufficient number of dwellings to meet the identified housing needs. Accordingly, it is disappointing that the Local Plan does not offer options of blended strategies to demonstrate how the housing needs could be met.
- 2.25 The Network observes that there are a number of brownfield opportunities within the Medway Urban Area. We also note that whilst many of these sites may fall under the 1ha threshold, this does not automatically render them an ‘SME type’ site. This could be because the site may be high rise residential (and thus unlikely to fit to a traditional SME model) or these sites come with substantial viability issues (either through decontamination, demolition or existing use values). Thus these brownfield sites pose a substantially greater risk than greenfield sites and places greater risk on that developer. The Local Plan should avoid identifying the ‘most difficult sites to unlock’ as SME sites as it is simply placing additional burden on SMEs to deliver at greater risk.
- 2.26 Accordingly we consider that a qualitative exercise is undertaken when assessing these sites to determine if they are being promoted by an established/genuine SME, and if not, the suitability and ability of an SME to bring forward any given brownfield site – given the physical and financial constraints present should be assessed.



- 2.27 Notwithstanding, whatever strategy is subsequently adopted by the Council, it should include the required minimum housing on small sites (2,900 dwellings) and fully support the delivery of SME sites through a specific small sites policy.
- 2.28 We also note the particular high reliance on windfall sites – 3,000 dwellings. Whilst this is supported in the context of flexibility for SME’s, this windfall delivery can be enhanced by the introduction of a small sites policy, which allows for SMEs to come forward with good quality development. An example of the policy can be found in **Appendix 2** to this statement and previous discussions with the Council on this policy have been supported.
- 2.29 Any future plan should provide for a policy framework to allow SMEs to deliver throughout the lifetime of the plan, particularly in rural areas.
- 2.30 As part of the Network’s objective, it has sought to introduce a policy into emerging Local Plans that seeks to support small and medium sized developments that builds on the 1ha site requirement but expands this into a policy framework that can allow SMEs to successfully operate within the policy framework of a Local Plan.
- 2.31 In this respect, the SME policy set out in Appendix 2 is a policy in which the Network considers would provide the opportunity for SME sites to come forward, whilst offering the LPA an enhanced development coming forward that is typically delivered by an SME – i.e. in respect of design quality or for instance carbon efficiencies.
- 2.32 Whilst the ideal scenario would be for the same policy to be adopted by each Council (and therefore apply a level of consistency in understanding and application of the policy), we also recognise that each LPA has a specific set of circumstances that may require the policy wording to be tweaked. This maybe the case in Medway and the Network would welcome further discussions as to how such a policy could be introduced into the Plan.
- 2.33 A Small Sites policy will allow for SMEs to operate within the Plan Led system and will allow both small and medium sites to come forward (i.e. sites above 1ha and up to 60 dwellings). Such a policy will allow an SME to come forward with a planning application that meets locally defined specific criteria, such as high-quality design, low carbon footprint, reduced time limits for implementation etc and a flexible approach to the delivery of Affordable Housing. On the other side of the coin, the Council will receive higher quality developments being submitted



that are in character with more rural fringe locations (remembering the SME site typology), but that those Rural Fringe locations can be supported with an appropriate amount of growth that will assist in preventing, slowing or reversing their cycle of decline.

- 2.34 Such a policy would provide for additional weight to be afforded to an SME application, and thus allow greater weight to be applied to the application in the overall planning balance. This would reduce risk to an SME and increase certainty at the planning stages, as the SME can tailor their scheme to meet the specific criteria.
- 2.35 Crucially, the policy is designed to deliver up to 60 dwellings (and thus meet the M of SME as much as the S) but is worded in a way that seeks to ensure the development coming forward in any given location is consistent and respectful to the area that it is in i.e. a scheme of 60 dwellings may not be appropriate for a small village, but 20 may be suitable, and therefore a policy that refers up to a figure of 60 dwellings is should be deemed acceptable and allows the policy to be flexible.
- 2.36 In addition, the 60 dwelling threshold is very much seen as the scale of developments where larger SME's start to compete with Volume housebuilders on sites. A volume housebuilder will tend not to drop below 60 dwellings and thus the Policy is desgned to really assist SME delivery and support the delivery of bespoke high-quality development, but also directly respond to certain SME challenges, such as how to deliver small numbers of Affordable Housing on any given site.
- 2.37 The Network recognises that other Kent LPAs are seeking to introduce a Small Sites Policy and a key aim for the policy is that there is a level of consistency in the wording across a number of LPAs, in order that the interpretation and understanding of the policy is also consistent on a cross boundary level – again seeking to reduce the risk at the planning stages to an SME.
- 2.38 The importance of a planning consent is vital to the success of an SME, no matter how small (or large) that scheme is, and greater engagement is always encouraged. This works both ways and greater engagement can improve the submission material of an SME and thus also reducing risk.
- 2.39 A further burden on SMEs, and a point that the above policy is seeking to assist with is delivery of Affordable Housing. This is a wider matter than Medway, but it is well recognised that



Registered Providers are rarely interested in sites unless the number of affordable homes being offered equates to at least 20 affordable dwellings. The policy seeks a flexible approach to how Affordable Housing can be delivered by an SME in instances where it is the RP that is not interested, not that the SME does not wish to provide affordable home

2.40 Coupled with the small scale allocation (2,900 dwellings) and windfall allowance (3,000 dwellings), this amounts to up to 5,900 dwellings to be delivered on small scale and windfall sites. This is a substantial number and therefore should be set within a positive policy framework.

I. Paragraph 5.14

2.41 Paragraph 5.14 suggests the Council has undertaken a comprehensive and iterative review of potential sources of land at that the LAA will be published with this consultation document. The LAA that has been published is not analysis of sites but simply includes the data that was used to submit each site to the call for sites process. It is therefore lacking in any evidence and detail as to the suitability of these sites to support such a strategy. This includes the use of the Brownfield Register.

2.42 The critical element of actually meeting housing needs is not necessarily 'what' the overall number is, but 'how' it is anticipated to meet that number. It is noted that the Local Plan seeks to rely on a significantly high proportion of windfall development to meet its housing need.

2.43 We propose that sufficient specific allocations are made to meet the housing requirement and that windfall allowance is applied over and above the allocated sites (that meets the full housing need) to offer flexibility in the plan in the event some of the allocations are not delivered. This may also assist with the lifetime of the plan issue.

2.44 This option means that the minimum housing needs are likely to be met, as sufficient allocations have been made to meet this figure, with the flexibility being absorbed by the windfall development.



- 2.45 Such an approach would also provide for a more robust Housing Land Supply position as it would be less reliant on windfall sites coming forward and allow for more sites to go into the forward trajectory.

APPENDICES

APPENDIX 1
The Role of SMEs



THE ROLE OF SMEs

- 1.1 This statement set out the importance currently being placed by Central Government on the role of Small to Medium Enterprises (SMEs) in the housebuilding Industry and demonstrates the vital role SME Housebuilders will play in complementing volume housebuilders to deliver the Council's housing requirements and in turn the national housing target.

A. The Government's Position on SME'S

i) **Building More Homes – July 2016**

- 1.2 The Government has made it clear that it is committed to increase housebuilding to deliver 300,000 homes per year by the mid 2020's. The target figure of 300,000 homes per year comes from a recommendation in the House of Lords Economic Affairs Committee report, 'Building More Homes', published in July 2016¹. The figure takes into account estimated population change but also to address the backlog created by the failure to build enough homes over many years. All the main political parties have accepted the 300,000 dwelling per annum figure.
- 1.3 Statistics monitoring completions across the UK (gov.uk) confirm Housebuilding has not achieved this level of growth since 1977-78 (314,090 dwellings – Live_Table 109) and in 2017-18² only 222,194 dwellings (Live_Table 122) were completed. Whilst this is an increase since 2012-13 (124,722 completed dwellings), this is still well short of the 300,000 dwelling target.

ii) **Home Builders Federation – January 2017**

- 1.4 In January 2017, the Home Builders Federation prepared a research paper titled 'Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes'³. This document highlighted a number of facts, inter alia:
- In 1988, small builders were responsible for 4 in 10 new build homes (40%). Today it is just 12%.
 - In 1988, 12,000 SMEs were building houses. In 2017, this figure was only 2,500 SMEs.

¹ <https://publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

² 2018-19 data is not yet complete.

³ https://www.hbf.co.uk/documents/6879/HBF_SME_Report_2017_Web.pdf



- The average permissioned housing scheme has increase in size by 17% since 2007, suggesting many allocated sites are out of reach for smaller companies.
- Small sites are consistently efficient in their delivery.
- Delay and risk during the planning stage has influenced lender attitudes to housebuilding meaning terms SMEs borrow on are restricting growth opportunities.
- In 2007-2009, 33% of small companies ceased building homes.
- Returning to 2007 home builder levels could see housing supply boosted by 25,000 dwellings per year.

1.5 The HBF report attributes the reasons for the decline in SMEs has been for two principal reasons:

1. A long-term trend following landmark planning legislation in 1990 which tipped the balance of control significantly further away from entrepreneurial home builders to LPAs; and,
2. The above long-term trend compounded by the Global Financial crisis in the late 2000s when the availability of development finance became a concern.

1.6 The report continues that *'the above effects are further compounded by the availability of suitable housing sites and the constant struggle of securing an implementable planning consent through the planning process beset by delays and bureaucracy. These delays and associated costs have tangible impacts on SMEs and their ability to grow. Whilst larger companies can mitigate risk across a number of sites, small firms encountering delays on one or two sites will be the difference between a year of growth and a year of contraction'*.

iii) White Paper – February 2017

1.7 The release of the Government's White Paper in February 2017 titled 'Fixing our Broken Housing Market'⁴ only reinforced the concerns about the lack of SMEs building Houses. The Report identified 3 main problems and described the housing market as 'broken', blaming the supply shortage, *"for too long, we haven't built enough homes"*. The three problems were identified as:

1. Not enough local authorities planning for the homes they need;
2. House building is simply too slow; and,

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf



3. The construction industry is too reliant on a small number of big players. (our emphasis)

1.8 The white paper outlined the Government's plans to change ('fix') the market. It called for *'a new approach to house building that included: building homes based on need; building homes faster; diversifying the house building market; and by making it more affordable for people to buy homes.' (our emphasis)*

1.9 The White Paper was clear that the Government intends to open the housing market to smaller builders and those who embrace innovative and efficient methods.

iv) House of Lords Debate – January 2018

1.10 On 11 January 2018, the House of Lords debated 'Housebuilding in the UK'⁵ and noted the performance of the UK's major house builders. The debate acknowledged the 2017 HBF report and focussed on the HBF suggestion that part of the practice of local authorities focusing on larger sites with a very high number of units may be counterproductive. The debate acknowledged *'that while it may be efficient in strong market areas, it is inefficient in weaker market areas. While the NPPF has been lauded for increasing the number of planning consents, it is argued that the number of sites permissioned, in areas of need, remains short of where it needs to be.*

v) Revised NPPF – July 2018

1.11 The manifestation of the above discussions set about the introduction of a new approach within the revised NPPF 2018⁶, which sought to encourage the use of smaller sites and the requirement that 10% of the housing requirement on sites no larger than 1ha should be identified. The 10% target and 1ha was amended from the consultation version suggestion 10% of 'allocations' and only 0.5ha sites. The increase acknowledged the greater variety of sites SMEs are attracted to.

vi) Letwin Independent Review of Housing Build Out Rates – October 2018

⁵ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/LLN-2018-0001#fullreport>

⁶

<https://webarchive.nationalarchives.gov.uk/20181206183454/https://www.gov.uk/government/publications/national-planning-policy-framework--2>



1.12 In October 2018, Sir Oliver Letwin issued his final 'Independent Review of Build Out'⁷ report and recommendations on how to close the significant gap between the number of housing completions and the amount of land allocated or permissioned on large sites in areas of high housing demand.

1.13 Whilst the main body of the report focussed on the perceived issue of land banking, Sir Oliver Letwin identified that the '*build out rate*' on small sites is intrinsically likely to be quicker than on large sites; (to take the limiting case, a site with just one house will take only as long as required to build one unit).'

vii) Homes England Strategic Plan 2018-2023 – October 2018

1.14 In October 2018, Homes England released its 5-yr '*Strategic Plan 2018-2023*'⁸ plan to detail how it will improve housing affordability, helping more people access better homes in areas where they are needed most. The plan outlines their ambitious new mission and the steps that they will take, in partnership with all parts of the housing industry sector, to respond to the long-term housing challenges facing the country.

1.15 The Strategic Plan goes to some lengths identifying the decline in SME housebuilders and the result being the house building market is increasingly made up of a small number of house builders, meaning there is insufficient diversity, competition and capacity. The report continues:

There are a number of barriers preventing smaller builders from delivering a greater number of homes including: a lack of development finance; a land market weighted in favour of larger builders; and a complex planning system.

This is why we'll create a more resilient and competitive market by supporting smaller builders and new entrants. In addition, Homes England will work with house builders to promote better design and higher quality homes.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf

⁸ <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223>

- 1.16 Driving Market Resilience has therefore been identified as a key priority for homes England. This includes access to finance but crucially where HE own sites which are too large to be developed by smaller builders, they will look for opportunities to create smaller parcels which better suit their capacity. They will achieve this improving opportunities for smaller builders to access land, and introduce simpler tender and legal documents on smaller sites to make the bidding process easier.
- 1.17 Furthermore, the strategic report looks beyond the immediate 5-yr plan and identifies a longer term priority to explore opportunities for, inter alia, removing the planning burdens faced by smaller builders on more complex sites.

viii) House of Commons Briefing Paper – December 2018

- 1.18 On 12 December 2018, a House of Commons Briefing Paper titled *'Tackling the Under-Supply of Housing in England'*⁹ was released. The report addressed all facets of factors influencing the delivery of new homes and addressed in detail 'Support for SME Developers'.
- 1.19 The Briefing paper recognised the barriers to delivery and the impact that competition for land has on SMEs. The report states that *'While there is sufficient land to build on, land is scarce in economic terms as its supply is inherently limited and fixed. This leads, it is argued, to developers having to undergo 'fierce' competition for land "while remaining uncertain as to what planning permission they will be able to secure." The price of land is certainly viewed as a barrier to housebuilding. The gain in value that planning permission offers is said to encourage strategic land trading, rather than development, resulting in the most profitable beneficiaries of residential development being the landowner, not the developer. High land prices can, in turn, force down the quality and size of new homes and present difficulties for small and medium sized enterprises (SMEs) when seeking to compete for sites to develop.'* (our emphasis)
- 1.20 The Briefing Paper further acknowledged the over reliance on a small number of developers and considered that *'This concentration of market power is felt to inhibit competition and can exacerbate the impact of market shocks when all the large firms simultaneously reduce output'*.
- 1.21 The briefing paper recognised that housebuilding requires considerable up-front investment, meaning that *'in most cases, new housing developers need access to finance. For the housebuilding industry, a particular concern is access to finance for SME developers.*

⁹ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7671#fullreport>



The Aldermore Group, a bank specialising in finance to small businesses, have stated: ...smaller developers continue to struggle with access to finance, with a recent industry survey showing that more than 50,000 construction and real estate firms have begun the year in 'significant' financial distress...unless more is done by lenders to increase funding to smaller regional developers, the potential for the industry to reach... [the Government's house building target]...will be less likely.'

- 1.22 Problems accessing finance can have an impact on house builders' ability to produce high quality housing, as well as on the overall capacity of the house building industry. As far back as the Budget 2014 a commitment was made to support SME access to finance with the government creating a £500 million Builders Finance Fund to provide loans to developers to unlock 15,000 housing units stalled due to difficulty in accessing finance. In July 2015, the then Housing Minister announced that the Fund would be extended. The Spending Review and Autumn Statement 2015 further extended the £1 billion Fund to 2020/22. In October 2016 the launch of a £3 billion Home Building Fund under which builders, including SME builders, can obtain loan finance to assist with development costs and infrastructure work was established.
- 1.23 The Autumn Budget 2017 announced a further £1.5 billion for this Fund "providing loans specifically targeted at supporting SMEs who cannot access the finance they need to build. The 2017 Budget also said: "The government will explore options with industry to create £8 billion worth of new guarantees to support housebuilding, including SMEs and purpose built rented housing.
- 1.24 The briefing continues that SME developers are less able to withstand market shocks. This is illustrated by the fact that their share of total housing starts declined after each of the last two house price crashes (as quantified in the 2017 HBF report). A factor that would reduce risk and improve confidence in the development process is house price stability.

ix) Revised NPPF - February 2019

- 1.25 In February 2019, the latest version of the NPPF¹⁰ was released. This continues the March 2018 version in respect of the desire to encourage smaller sites to come forward in the planned system. Paragraph 68 of the NPPF 2019 states:

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
 - b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
 - c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
 - d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

- 1.26 The NPPF makes it clear that that small and medium sized sites can make an important contribution to meeting housing requirements in an area. To this end and to encourage small and medium sites, para 68 (a) seeks that 10% of small sites no larger than 1ha should be identified.
- 1.27 MBC needs to respond to this guidance in a proactive way. As detailed above, due to the competition for SMEs to enter the market it is likely that sites being promoted by SMEs will fall into Rural Service Centres or smaller villages away from the main urban areas or areas perceived as having the greatest accessibility. In this respect, paragraphs 77 and 78 (Rural Housing) of the NPPF complement paragraph 68 insofar that they recognise that planning policies need to be responsive to local circumstances and support housing development that reflects local needs. Para 77 continues that to support opportunities for affordable housing, some market housing should be considered to facilitate this. Para 78 further supports that housing should be located where it will enhance or maintain the vitality of rural communities. Policies should identify opportunities for villages to grow and thrive.
- 1.28 Small and Medium sized sites can make a valuable contribution to these locations principally because the approach of SMEs is more flexible than a volume housebuilder and therefore can at a scale and quality that reflect the characteristics of village locations.



x) **Speech by Minister of State for Housing, Esther McVey – September 2019**

1.29 Most recently, in September 2019, the Minister of State for Housing, Esther McVey gave a speech¹¹ at the convention for the residential property sector. Alongside reaffirming the commitment to 300,000 homes per annum, reference was made to improving the quality of housing and posed the following point *'and what about the jobs and the careers to build all these homes, we need to think about that. We need to be opening up this house building to SME's, bringing them onboard, bringing it to communities, bringing it to the self-build and bringing in modern methods of construction.'*

B. Pace of Delivery of an SME

1.30 SME's help diversify the market and deliver choice and quality, but they can also deliver at a quicker pace than larger sites. This means that by supporting SME's into the Maidstone market, MBC can strengthen its Housing Delivery and ensure a steady supply of deliverable sites.

1.31 Typically, Esquire Developments aim to take no more than 6 months from receipt of detailed consent to start on site.

1.32 The SME business model is usually set up differently to volume housebuilders. SME's are more flexible in matters such as design and landowner negotiations. In addition, SME's also try to limit their financial risk/exposure. As a result, there are a number of factors that that affect an SME's approach to delivering a site. This includes:

1. Cash Flow

- SMEs tend not to land bank as a return on their financial exposure/risk is critical to maintaining a profitable business. In this respect Cash Flow is critical and due to the time lag involved in the return of funds from a development (i.e. once homes begin to be sold), it is essential SMEs seek to reduce the time taken from the point of receiving a planning permission to the point of the sale of a house. This means once an implementable planning consent is secured, SMEs commence as quickly as possible to start on site. Larger PLCs can better carry this risk through multiple sites and numerous pipeline of completions - whereas SME's will have fewer outlets and therefore less regular returns in this respect.

¹¹ <https://www.gov.uk/government/speeches/resi-convention-2019>



2. Infrastructure Requirements

- Infrastructure requirements on small to medium sized sites are less onerous. This means discussions/contracts with utility providers are less complicated and time taken to implement the required infrastructure is less allowing this element of the build to be quicker.

3. Land Negotiations

- Often small and medium sized sites have fewer legal complications. This includes fewer land registry titles and fewer landowners and as a result fewer negotiations/legal complications that larger sites or larger PLC companies require. This often makes the 'land deal' more straightforward and thus quicker.

4. Flexibility in Product and Process

- Due to an SME's flexible approach to design quality and that standard house types tend not to be adopted, SME's have the ability to be more flexible when it comes to product choices. This not only allows the SME to offer a variety of product or specifically address local characteristics/design requirements, but it also means the SME can respond quickly to any delays or changes to the supply. This is mainly due to the decision makers being involved in the process and being 'hands-on'. As a result, there is a less hierarchal structure and decisions can be made quickly and efficiently – again reducing time.

5. Working relationships

- SMEs tend to work with a close number of trusted consultants and suppliers who also tend to be SMEs. This not only ensures quality of service and product but allows for open communication when it comes to availability of supplies and delivery of products. This means any potential delays are anticipated and the ability to successfully work through solutions. In addition, the sale of the dwellings tends to be on a more bespoke basis meaning the dialogue and communication between SME and Buyer is also on an open and communicative basis.

6. Sales Rates

- Once construction has commenced, completion rates, which follows sales rates matches the market demand and therefore an SME can build out at the same pace as larger volume housebuilders who adopt the same approach.



- 1.33 Whilst there is little literature addressing the delivery of small sites, there is a significant amount relating to the delivery of large-scale sites. Nathaniel Litchfield & Partners (NLP) produced a research paper titled ‘Start to Finish – How quickly do large-scale housing sites deliver? (November 2016)’¹². The report recognised that *‘Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period..... But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes’*.
- 1.34 The report continues that *‘past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result’*. NLP suggest that if authorities’ Local Plans and five-year land assessments are placing reliance on large-scale developments, including Garden Towns and Villages, to meet housing need, then *“the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.”*

xi) Revised NPPF – July 2021

- 1.35 The NPPF was revised in July 2021¹³ to accommodate a number of changes. This included a change in emphasis to good design and how good design was fundamental to what the planning and development process should achieve. Furthermore more, it confirmed development that is not well designed, should be refused and conversely, significant weight should be given to developments which reflect local design policies and/or promote high levels of sustainability or help raise the standard of design more generally in an area. SME’s as well placed in this regard to meet these challenges successfully.
- 1.36 The updated NPPF also amended the numbering of paragraph 68 to paragraph 69, but made no text changes to the 2019 version.

xii) The Bacon Review (August 2021)

¹² <https://lichfields.uk/media/1728/start-to-finish.pdf>

¹³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 1.37 In August 2021, the Prime Ministers Independent Review into scaling up self build and custom housebuilding was published¹⁴. Led by Richard Bacon MP. Whilst primarily dealing with recommendations to government on how to support growth in all parts of the custom and self build market, helping to boost capacity and overall housing supply in our housing market, the review touched on the plight of smaller building firms.
- 1.38 The report outlined how smaller firms now account for only 12% of new housing stock and *'have been largely squeezed out by very big companies who can afford the time and cost involved in negotiating a path through the complex thickets of the planning system'*.
- 1.39 The review continues that *the SME sector has nearly been destroyed as a direct consequence of a regulatory environment which is both exceptionally complex and fraught with risk, so that the gaining of planning consents requires both very deep pockets and the ability to bear significant risks over very long periods of time.*

xiii) Meeting Housing Demand, House of Lords Select Committee (January 2022)

- 1.40 In January 2022, the House of Lords Select Committee released its report 'Meeting Housing Demand'¹⁵. A series of recommendations to Government about addressing housing demand. This included recommendations on the planning system as well as the role of SMEs (Chapter 4). The report confirmed:

'In this report, we call on the Government to take action and remove the administrative and other blockers which, at present, make increasing the number of homes built much more difficult. We recognise that these challenges play out differently across the country as a whole. London and the South East face different challenges to other regions, as do those at different ends of the affordability scale.'

Small and Medium-sized Enterprises (SMEs)

The role of SMEs in the housebuilding industry has collapsed: in 1988, SME housebuilders built 39% of new homes; now they build just 10%. If housing demand is to be met, SMEs should be supported through reduced planning risk, making more small sites available, and increased access to finance. We also

¹⁴ <https://www.gov.uk/government/publications/independent-review-into-scaling-up-self-build-and-custom-housebuilding-report>

¹⁵ <https://committees.parliament.uk/work/1328/meeting-the-uks-housing-demand/publications/reports-responses/>



provide options for a fast-track planning process for SMEs to reduce delays and planning risk.

1.41 In terms of summary of conditions, in respect of SME's the report made the following:

SMEs

12. The role of SMEs in the housebuilding industry has seen a sharp decline: in 1988, SME housebuilders built 39% of new homes, by 2020 this had dropped to 10%. The Government should encourage SME housebuilders in order to diversify the market and maintain competition. (Paragraph 103)

13. Local authorities should support SME housebuilders to navigate the planning process. One focus of the Government's planning reforms should be to reduce planning risk by making decisions more predictable and reducing delays, which will benefit SMEs. The Government should work with local planning authorities to create a fast-track planning process for SMEs. (Paragraph 104)

14. Wider adoption of the 'master developer' model, where larger sites are built out by a number of different housebuilders, would help SME housebuilders bid for more secure developments. The Government should require local planning authorities and Homes England to increase the percentage of homes on larger sites each year which are built by SME housebuilders. (Paragraph 108)

15. Access to finance is one of the key barriers for SME housebuilders. The Government should work with lenders to encourage them to provide more support to SME housebuilders on commercial terms. (Paragraph 112)

1.42 In March 2022, the Government published its response to the report¹⁶. In response to matters relating to SME's, the Government responded in the following ways:

'We agree with the Committee that there remain some specific barriers to increasing housing supply. To alleviate these, we are continuing to drive up the supply of good quality new homes that people need and want, including by diversifying the market and supporting SMEs through the Government's Levelling Up Home Building Fund'

The Government wants to increase competition in the housebuilding market, supporting SME housebuilders to deliver the choice of housing consumers need

¹⁶ <https://committees.parliament.uk/publications/9234/documents/159940/default/>



and want in this country. We agree with the Committee's report that SMEs have a vital role in making the housing market more diverse, competitive and resilient, and we are committed to ensuring the right support is in place. SMEs have a vital role in training and retaining their workforce, including delivering apprenticeships.

As stated in the Committee's report (p. 43), Government is aware that historically the three main barriers SMEs identify as facing are planning, land and finance. We have put in place a package of measures, including financial initiatives to help SMEs grow and develop, such as the Home Building Fund and the ENABLE Build Guarantee scheme. The Home Building Fund will see up to £3 billion of funding or short-term development loans provided to SMEs, custom builders and developers using modern methods of construction. It has supported many new sector entrants, with two thirds of the SMEs who have utilised funding existing for less than three years. We have committed 91% of the initial £2.5 billion development finance allocated to the Home Building Fund, and 94% of contracted transactions are with SMEs, two-thirds of which had existed for less than three years when accessing the fund. Home Building Fund development finance is now expected to support close to 70,000 homes once fully committed.

Funding has contributed to interventions like the Housing Accelerator Fund, a lending alliance between Homes England and United Trust Bank which provides SMEs with development finance at up to 70% Loan to Gross Development Value, and the Housing Delivery Fund, set up with Barclays, which provides £1 billion of loan finance to help support small and medium sized developers, speeding up the delivery of thousands of new homes across England.

To build on the success of the Home Building Fund, we have now launched a £1.5 billion Levelling Up Home Building Fund. This will provide loans to small and medium sized builders and developers to deliver 42,000 homes, with the vast majority going outside London and the South East.

We welcome the Committee's suggestions on planning and land. The Government is considering how to best take forward proposals around changes to the planning system, including how they align with and support our wider



mission to level-up the country and regenerate left-behind places. Within this, we are exploring further options to support prompt and faster build-out of sites as part of our proposed changes. These changes will support diversification by providing small builders with more speed and certainty in the planning process.

xiv) Levelling Up and Regeneration Bill: Reforms to National Planning Policy (Dec 2022) Consultation

1.43 In December 2022, the Government consulted on the ‘Levelling-up and Regeneration Bill: reforms to national planning policy’¹⁷. This proposed a suite of amendments to the NPPF. Specifically, in relation to SME’S, the consultation made the following statement:

More small sites for small builders

10. Small sites play an important role in delivering gentle density in urban areas, creating much needed affordable housing, and supporting small and medium size (SME) builders. Paragraph 69 of the existing National Planning Policy Framework sets out that local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. The Framework also asks local planning authorities to use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward; and to support the development of windfall sites through their policies and decisions. Local planning authorities are asked to work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

11. We have heard views that these existing policies are not effective enough in supporting the government’s housing objectives, and that they should be strengthened to support development on small sites, especially those that will deliver high levels of affordable housing. The government is therefore inviting comments on whether paragraph 69 of the existing Framework could be strengthened to encourage greater use of small sites, particularly in urban

¹⁷ <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy#chapter-4--planning-for-housing>



areas, to speed up the delivery of housing (including affordable housing), give greater confidence and certainty to SME builders and diversify the house building market. We are seeking initial views, ahead of consultation as part of a fuller review of national planning policy next year. Alongside this, the government has developed a package of existing support available for SME builders, including the Levelling Up Home Building Fund which provides development finance and Homes England's Dynamic Purchasing System which disposes of parcels of land.

1.44 Two important questions were asked as part of the consultation:

Q.24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

Q.25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

1.45 The outcome of the Consultation is pending and further review of the planning system to support SMEs is expected.

C. Conclusion

1.46 The role of SMEs has been fully recognised by Central Government (both in the house of Commons and House of Lords) and the wider Industry (HBF, NLP) in how important their role is to helping deliver the 300,000 homes per annum target. Constraints to SMEs have been identified, including that the plan-led system is orientated away from encouraging SMEs into the market and access to finance.

1.47 The 2019 NPPF has provision within it to specifically address this issue with a clear direction to Local Planning Authorities that 10% of all its housing requirements should be on sites that are 1ha or less i.e. approx. 35 dwellings and under per site. This is aimed at SME developers who deliver at or around this scale.

1.48 Most recently the Governments response to the House of Lords report 2022 confirms their commitment to supporting SMEs and recognising their role in meeting housing demand. The



most recent consultation to the NPPF in 2022 however acknowledged that the NPPF as drafted is not having the desired effect for SMEs and that this specific matter will be addressed in due course.

The Kent SME Developers Network

March 2023

APPENDIX 2
Small Sites Policy

SMALL SITES POLICY

Preamble:

Small sites and SME housebuilders play a significant role in housing delivery and have been described by Government as having National Importance. SMEs are more intrinsically linked with the local supply chain and are more likely to invest in local materials and construction, offer apprenticeships and utilise wider Kent based partners from concept through to sale.

SMEs are more adaptive to change and can bring forward bespoke developments quickly. SMEs are less susceptible to long term delays and do not land bank. Land ownership and infrastructure constraints are often far less challenging than on strategic scale developments aiding early delivery.

However, SMEs do not hold large land portfolios and tend to not invest in land over long periods of time. Land is rarely promoted through the Local Plan process as a result. Furthermore, land opportunities tend to be immediate opportunities, often as windfall sites or previously developed land. There are also limited land opportunities for SMEs who often find sites are located in rural fringe locations, meaning Sustainability factors vary from site to site creating uncertainty. In addition, small sites often only provide for small amounts of Affordable Housing which is unattractive to Registered Providers and can make schemes unviable or again, uncertain.

Accordingly, [insert LPA] will pro-actively support well designed new homes on small sites through both planning decisions and plan-making in order to:

1. Increase the contribution and speed of delivery of small scale housing sites to meet [insert LPA] housing needs;
2. Support and increase SME Housebuilders and associated local businesses delivering in [insert LPA];
3. Diversify the locations, type and mix of housing being delivered in [insert LPA].
4. Increase Design Quality

In order to increase certainty on small sites [insert LPA] will:

- 1 Identify and allocate appropriate small sites for residential development for phasing early within the plan period;
- 2 Publish an up to date rolling Brownfield Register, including a Part 2 list of sites whereby a permission in principle will be established;
- 3 Utilise local development orders and encourage neighbourhood development orders to bring forward suitable sites;
- 4 Take a flexible approach to delivery of Affordable Housing on a site by site basis utilising the opportunity to provide increased provision of First Homes or payment in-lieu of on site provision where site specific circumstances justify;
- 5 Provide opportunities for custom-build housing and community-led housing projects on suitable sites.
- 6 Prepare an SME Protocol process to allow for positive and productive discussions at the pre-application stage, with a clear expectation of material to be submitted and timescales. To ensure sufficient officer resource including an SME related PPA fee.

Small housing developments should be carefully and creatively designed to protect the amenity of surrounding properties in relation to privacy, for example through the placement and design of

windows and the use of landscaping. Environmental and architectural innovation should be supported and schemes should achieve good design.

A 60 unit threshold set out in Policy [insert Policy Number] Small sites is considered to be representative of the general threshold at which an SME may obtain and the point at which sites become too small for larger regional or volume Housebuilders. It is considered this scale of development will capture more SME type sites and facilitate support to the SME market. For this reason the small site policy differs from that used in Planning Practice Guidance and the definition of 'major development' in planning legislation.

Policy [insert Policy Number] Small Sites

In order to recognise the value of SMEs and small scale sites, the Council will support development of unallocated or windfall small scale housing (C3) and approve applications providing the harm does not demonstrably outweigh the benefits; and where:

- I. The site does not exceed 60 dwellings (net) and is of an appropriate scale to its location;
- II. The site is being brought forward by a recognised SME Developer and is not part of a larger site;
- III. The proposed development delivers;
 - a. A bespoke design approach;
 - b. A high quality design that is locally distinctive;
 - c. Is sympathetic to the character of its location;
- IV. All dwellings meet National Design Standards and endeavor to deliver a range of Carbon reduction build techniques;
- V. The proposed development preserves residential amenity, designated heritage assets and core environmental assets and increase net biodiversity.
- VI. A flexible approach will be encouraged to the delivery of Affordable Housing assessed on a site by site basis. Where on site provision is demonstrated through evidence to be unviable or unattractive (less than 70% Open Market Value) to recognised Registered Providers, the Council will permit alternative levels of Affordable Housing or alternative forms of tenure, including First Homes, payment in-lieu of on site provision or another form of recognised Affordable Product as defined in the NPPF.

It is recognised that SMEs can deliver quickly and applicants are encouraged to explore if a reduced implementation period is appropriate.

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

Date: 31 October 2023

Our ref: 04051/03/NT/NVe/27115547v4

Dear Sir/Madam

Medway Local Plan – Setting the direction for Medway 2040, Regulation 18 Consultation (October 2023): Representations on behalf of Haven Leisure Limited

On behalf of our client, Haven Leisure Limited (“Haven”), this representation responds to Medway Council’s Regulation 18 Local Plan ‘Setting the Direction for Medway 2040’ consultation. Haven is a subsidiary of Bourne Leisure Limited which submitted a response to the ‘Call for Sites’ consultation in February 2023, and previously submitted representations to the Local Plan Regulation 18 consultation held in 2018.

By way of background, Haven operates 38 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain and is therefore a significant contributor to the national tourist economy, as well as local visitor economies. Within Medway, Haven operates Kent Coast Holiday Park (formerly known as Allhallows Holiday Park).

For the company to continue to attract customers and to respond to changing market conditions, Haven needs to invest regularly in order to provide new and improved facilities and accommodation. For many of Haven’s holiday parks, improvements often necessitate the expansion of sites to improve the quality, type and amount of accommodation, and increase the range of facilities in order to extend the holiday season to provide more of a year-round attraction.

Please see below Haven’s response to the ongoing Medway Local Plan Regulation 18 Consultation which includes the Council’s direction for Medway’s growth and how the Council will help deliver on its ambitions for the local and global environment, supporting people and boosting jobs and investment in Medway. This letter focuses on the following topics:

- 1 Vision for Medway,
- 2 Strategic Objectives,
- 3 Spatial Strategy, and

4 Rural Development.

Vision for Medway 2040

Haven endorses the plan's Vision to establish Medway as a leading regional city, connected to its surrounding coast and countryside, with a thriving economy. By 2040, Medway is seeking to be an economic player in the region, supporting the growth of its business base and attracting new investment.

The Regulation 18 Local Plan Consultation in 2018 recognised Kent Coast Holiday Park as a major leisure and tourism destination and the contribution static caravan accommodation makes to Medway's tourism economy in particular. This reflects Paragraphs 84 of the National Planning Policy Framework (NPPF) (2023) which promotes tourism in rural locations, to support the rural economy.

Within this context, Haven considers that the Vision for 2040 needs to also include the wider role of tourism, specifically to highlight that tourism is a growing activity in Medway that should be supported to continue to make a significant contribution to economic growth. This is recognised in the Strategic Objectives section of the emerging Local Plan and Haven would encourage the Vision to be updated to reflect this.

Haven proposes adding the following wording to the Vision:

"Medway has maximised the opportunity to support growth in the tourist sector, further contributing to the diversity of the economy in the Borough."

Strategic Objectives

Haven endorses the Council's Strategic Objective which will see the Council looking to *"support growth in tourism, cultural and creative industries, extending the offer to include green tourism and city breaks, including realising opportunities in the domestic tourism market."*

Haven recommends that a positive tourism policy is included in the emerging Local Plan to facilitate delivery of this Strategic Objective.

Developing a Spatial Strategy

The Council has identified four broad categories of locations where development could take place, reflecting Medway's geography. The categories are informed by a Stage 1 Land Availability Assessment which has been carried out using the call for sites submissions earlier this year as well as sites put forward by the Council. Haven's comments on the Spatial Strategy relate to the rural development category.

Rural Development

Including rural sites within the Council's final Spatial Strategy is appropriate for the Local Plan given that the majority of land within the Medway is rural. There is a need for growth in these areas to support the vitality of rural settlements. The consultation document confirms that the rural areas in Medway could provide capacity for 14,736 homes. This exceeds the capacity within the other three

categories which include urban regeneration, suburban growth and green belt loss and therefore it's evident that the rural sites should have a role in the delivery of growth over the next plan period.

The NPPF (2023) promotes a strong rural economy through supporting sustainable rural tourism and leisure developments. Haven is a major employer within the Borough, providing many jobs for local residents. It is considered that employment at Kent Coast Holiday Park can assist in supporting the rural economy to raise skills levels and to increase local labour opportunities, promoting the diversification of Medway's economic base.

Haven encourages the Council to include rural sites within the emerging Spatial Strategy. Map 3 identifies a number of potential rural development sites that have been submitted to the Council for consideration. This includes site AS20/21, Land West of Allhallows. There is an opportunity to plan comprehensively at Allhallows. As the site is accessible with no overriding constraints, a mixed use development, including housing, tourism uses, open space and associated infrastructure is suitable, deliverable and achievable.

Haven also continues to promote the use of a site specific policy, through a site allocation for Kent Coast Holiday Park.

Summary

We trust these representations are clear and will be considered and reflected fully within the drafting of the Medway Local Plan. The Land Availability Assessment Interim Report confirms that next steps include interviews with planning agents and site visits. Lichfields and Haven would welcome the opportunity to meet with you on site and provide any further information you may require to assist with the next stage of assessment.

Please do not hesitate to contact me or my colleague Nirali Vekaria should you require any further clarification on any of the points made.

We would also be grateful if you could confirm receipt of these representations and keep us informed in the future of any further consultation stages on the Local Plan and any other emerging local development documents.

Yours faithfully



BA (Hons) DipTP MRTPI

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By email only to: futuremedway@medway.gov.uk

31 October 2023

TAR002/AO

Dear Policy Team,

**RE: MEDWAY LOCAL PLAN: Regulation 18 Consultation –
Setting the Direction for Medway 2040**

Thank you for the opportunity to contribute to the emerging Medway Local Plan. The following representations are submitted on behalf of Tarmac Trading Ltd.

Preamble

- 1.1 Tarmac supports the Council's endeavour in preparing a new Local Plan for Medway and welcome the additional Regulation 18 consultation now being undertaken. Medway has been a confident and ambitious authority, recognising that growth brings opportunities and that a positive approach to spatial planning allows infrastructure to be planned to effectively support development.
- 1.2 Tarmac, working with Aggregate Industries, are promoting strategic residential-led mixed use development at the site of the permitted Medway Cement Works, Holborough. Part of the site sits within Medway and offers the prospect of either stand-alone development (identified by the Council as Site ID CHR4), or forming part of a larger cross-boundary development. Tarmac, as lead-promoter, has engaged both Medway and Tonbridge and Malling Councils and is actively promoting the opportunity through both emerging local plans.
- 1.3 The Medway Cement Works was granted planning permission on appeal in 2001 and has been implemented,

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meaning that the planning permission remains extant. This alternative development scenario comprising residential-led mixed-use development offers the prospect of up to 1,000 homes together with supporting facilities including schooling and a mixed-use community hub. The wider opportunity, encompassing land within Tonbridge and Malling, offers the opportunity to deliver up to around 4,000 new homes allied to further educational facilities, services and local employment. Both schemes incorporate extensive green space areas.

- 1.5 Our representations follow the structure of the Local Plan consultation document, with specific paragraphs cited where relevant.

Context

- 1.6 We support the Council's recognition in **paragraphs 2.1 and 2.3** that Medway is a diverse authority, in its population, geography and economy. For that reason, the Local Plan will need to respond positively to housing and infrastructure need across the whole authority area. Whilst the Spatial Strategy categories provide a typology of opportunity sites, it is inevitable that a mix of sites will be needed across the authority area if all communities are to be supported.
- 1.7 We support the Council's ambition to reduce car dependency expressed in **paragraph 2.6**. As is recognised in the National Planning Policy Framework ('the Framework', September 2023) at paragraph 73, large-scale development offers particular opportunities to reduce the demand for travel by providing services and facilities within the development itself. Proximity to existing or potential public transport is also imperative, including opportunities to access local and regional rail services.
- 1.8 Housing need is a critical issue for the Local Plan, and the Council's recognition at **paragraph 2.7** that this encompasses not only the overall quantum of homes needed, but their quality, choice and mix meeting all community needs are important. Medway's diverse geography underpins the requirement to assess need across all communities in Medway.
- 1.9 We note the Council's position, expressed in **paragraph 2.10** following the loss of HIF monies to support strategic development at Hoo St Werburgh. Whilst the Council will look at alternative means of securing investment, we note that there are risks in relying on the delivery of infrastructure in the absence about its funding and deliverability.

Vision for Medway

- 1.10 We support the Vision for Medway set out in section 3 of the consultation document. We note the Council's desire to ensure that a positive legacy will be left by mineral supply development in Medway and consider that historic minerals sites offer opportunities for development or for supporting development through complementary leisure, recreation, open space or ecological roles.

Strategic Objectives

1.11 The Strategic Objectives identified by the Council are supported. As we note above, large scale development is able to ensure the co-location of new homes and services such as to reduce the need to travel, supporting the objectives for **a sustainable and green future**. Larger developments also offer increased diversity in the size, type and tenure of new homes, including the delivery of specialist housing. Well-planned strategic development is also better able to deliver local services to support residents, including green infrastructure, thereby **supporting healthy lives and strengthening communities**. We note that in relation to **securing jobs and developing skills for a competitive economy** no reference is made neighbourhood employment opportunities, including the provision of small-scale flexible office accommodation. With radically different working patterns, the role of community hubs is increasingly important. Finally, we support the desire for **quality and resilient development**, recognising that the timely delivery of infrastructure is easiest achieved where simple land control structures exist and where long-term interests exist.

Delivering a Spatial Strategy

- 1.12 We welcome at **paragraph 5.4** the recognition that a housing crisis exists, and that housing need must lead to the “right homes in the right places”. The Council is right to plan on the basis of existing government policy for assessing need. Medway Council has consistently embraced growth, recognising that opportunity and prosperity for its residents is achieved through growth. It is imperative that the Council does not deviate from that approach since doing so would be to the detriment of those who live and work in Medway or who might choose to live or work there given the opportunity.
- 1.13 We note the Council’s reference at **paragraph 5.6** to the preparation of new evidence to support the Plan. It is important, however, that such evidence is prepared in a way which is robust and reasonable. For example, where specific sites are being proposed, their boundaries should be used to assess suitability, rather than broad-brush analyses taking in wider landholdings or larger tracts of land. This is particularly important in relation to policy designations, landscape or Green Belt matters where the granularity of the assessment can make a significant difference to assessment outcomes.
- 1.14 The Council sets out in **paragraph 5.10** that the impacts of development on the environment must be subject to further consideration with particular regard to designated habitats and landscapes. We support the Council’s approach, and in particular note that the Council recognises that mitigation can be an appropriate way of dealing with impacts. Development can also facilitate enhancements which would otherwise not be achieved, including through management, enhancement or establishing new habitats.
- 1.15 We support the Council’s approach in **paragraph 5.12** which provides flexibility to deal with delayed or under-delivery of identified housing supply sites. It is of course

important that rigorous assessment of the deliverability of sites is made prior to their allocation, where factors such as viability, need for and deliverability of infrastructure, and complexity of land control should all be assessed.

- 1.16 We note the Council's explanation at **paragraph 5.14** of the Land Availability Assessment and note that the relevant part of the Medway Works site (Council reference CHR4) has been taken forward to the Stage 2 assessment. We support that decision, and recommend that in assessing the site, a finer grain analysis is undertaken than has been the case in earlier evidence base documents (for example, the site occupies a small proportion of the Parcel used to assess Green Belt impacts in the 2018 Stage 1 Assessment).
- 1.17 The Council has at **paragraph 5.16** sought to identify categories of locations to be considered in the consultation. Sites forming part of the prospective housing land supply are identified under those categories. Whilst three of the categories are clearly spatial in their definition, the 'Green Belt loss' category is a policy typology, not a spatial typology. We think that the overall categorisation conflates two factors, and that sites with the Green Belt should also be considered in terms of their spatial characteristics. For example, the Medway Works site is subject to Green Belt policy, but might also be considered a rural development opportunity. This duality is critical in considering the Council's own ambitions to respond positively to the diversity expressed at paragraph 2.1, in the Vision, and the Strategic Objectives. We comment further on the four typologies as follows.
- 1.18 **Urban regeneration** sites are rightly described by the Council as important opportunities to make use of previously developed land and offer distinctive characteristics including strong heritage and placemaking dimensions. The Council rightly notes at **paragraph 5.18** and again at **paragraph 5.26** the complexity of the sites and the work needed to deliver them. Viability and deliverability are key factors which should be used to both identify and phase development over the plan period. Reliance on early delivery should be avoided in the Local Plan housing delivery trajectory. We note that **paragraph 5.28** references the need to relocate existing businesses should redevelopment of the Chatham Docks and Medway City Estate be envisaged. Any assessment of suitability of those sites should consider the economic, social and environmental implications of relocation, including the extent to which new employment locations may be less sustainably located or may even be beyond the authority boundary, and therefore represent a loss of employment.
- 1.19 **Suburban extension** sites tend to be located to the east of Medway, and do not therefore, as an individual typology, support needs across Medway. As the Council notes at **paragraph 5.29**, there are local constraints, include sites which form a green lung for existing communities and local highway conditions. Whilst the Council also identifies advantages, such as at **paragraph 5.30** where the ability to deliver development quickly is noted, that characteristic is not unique to this option but instead relates to the characteristics of 'greenfield sites'. Similarly, the advantage of

scale noted at **paragraph 5.31** would apply to any development of scale, assuming that viability and land ownership allowed the effective coordination and delivery of social and other infrastructure. We note concerns expressed at **paragraph 5.34** that existing local services may not offer sufficient capacity to serve development – this is a particular problem where a number of relatively smaller developments piggy-back on existing infrastructure but do not, in themselves, trigger new or improved infrastructure in their locality. Developing at scale avoids that issue.

- 1.20 **Rural development** sites are located predominantly at the Hoo Peninsula. In our view, the Medway Works site can also be categorised under this typology. As with the other spatial options, the relatively narrow geographic spread of sites means that needs across Medway would not be met by this typology.
- 1.21 The Hoo Peninsula is a recognised opportunity which the Council has worked hard to realise. The loss of HIF programme funding does however give rise to uncertainty about deliverability, given the need for infrastructure investment to support and facilitate development and to engender sustainable travel choices (a specific point of concern raised at **paragraph 5.45**). There is also a complex land control situation (acknowledged at **paragraph 5.43**), with inherent risk to coordination, collaboration and delivery of sites and the infrastructure necessary to serve the community. Caution is therefore required over both the certainty and timing of new development.
- 1.22 **Green Belt** sites are a policy typology, although the geographic extent of the Green Belt means that sites are located towards the west of the authority area. The Medway Works site adjoins the Tonbridge and Malling administrative area, with the opportunity for significant cross-boundary development noted by the Council. The Council is already engaged in cross-boundary discussions and so we do not consider this to be an impediment in itself.
- 1.23 The Council draws the distinction at paragraph 5.47 between the policy designation of Green Belt land and the site characteristics of greenfield land. This is an important distinction. A further distinction is also required for particular sites: those which do not fall within the definition of previously developed land as set out in the NPPF Glossary, but which nonetheless have been subject to disturbance through, for example, minerals working -the benefits of bringing back into use degraded or derelict land are identified in paragraph 120 of the Framework. This is relevant to the Medway Works site, but we further consider that the extant planning permission for the cement work is also a relevant consideration.
- 1.24 The Framework is clear on the approach to be taken by planning authorities in respect of Green Belt land. For plan making, exceptional circumstances must apply before boundaries can be altered, with a need to examine reasonable options for meeting identified need, and to be informed by cross-boundary discussions. The Framework recognises at paragraph 142 that promoting sustainable patterns of development should be taken into account in reviewing boundaries. The Framework continues in that paragraph that where it is necessary to release Green Belt land, “plans should

give first consideration to previously developed land and/or is well served by public transport". Compensatory improvements can be taken into account in assessing the appropriateness of Green Belt releases. Given the scale of growth which Medway must accommodate, a Green Belt Review is necessary and must be prepared to inform the next stage of plan making.

1.25 We note that Medway's last Green Belt Review was undertaken in December 2018. It is out of date in terms of the policy context in which it was prepared (Planning Practice Guidance has been since been updated in relation to visual openness) and circumstances have now fundamentally changed in terms of housing need. A full Green Belt Review is therefore necessary.

1.26 In undertaking that review, we would urge the Council to review its previous methodology to improve the robustness of the assessment. Specifically:

- findings in the assessment should explicitly and in detail cross-refer to the pro-forma templates used to assess parcels;
- greater use should be made of Medway's Landscape Character Assessment noting, however, the distinction that the assessment of Green Belt is not an assessment of landscape quality;
- the relevance of cited planning decisions should be described and justified, with regard to the issues arising rather than the number of relevant decisions; and
- finer grain parcel definitions should be used – extensive parcels which include highly variable geography and features are not appropriate. Given the Council's understanding of potential development sites, more detailed site-specific analysis can and should be undertaken.

1.27 An assessment of the impact of the release of the site from the Green Belt has been undertaken by David Jarvis Associates on behalf of Tarmac, using a consistent method of assessment utilising the pro-forma used by the Medway Green Belt Appraisal of 2018. The assessment concluded that the Medway only site:

- Makes a **moderate** contribution to Green Belt Purpose 1 (to check the unrestricted sprawl of large built up areas).
- Makes a **moderate-low** contribution to Green Belt Purpose 2 (to prevent neighbouring towns from merging into one another).
- Makes a **moderate** contribution to Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment).

1.28 In the context of development of the larger cross-boundary site, the Medway parcel:

- Makes a **moderate** contribution to Green Belt Purpose 1 (to check the unrestricted sprawl of large built up areas).
- Makes a **moderate-low** contribution to Green Belt Purpose 2 (to prevent neighbouring towns from merging into one another).
- Makes a **moderate** contribution to Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment).

1.29 The analysis concluded that:

- Overall Contribution: Moderate - Low. The contribution is not significant.
- Purposes: Out of ten criteria, the Site makes a 'High' score against just one, for Purpose 3; a 'Moderate' score against one criteria for Purposes 2 and 3; a 'Moderate - Low' score against one criteria for Purpose 1, and scores 'Low' against the remaining six criteria spread across the three Purposes. This informs the reasoning for shifting the balance of the overall contribution to Moderate-Low.
- Aims: If the promoted Site is to be inset, the remaining land parcel 5 within the Green Belt will still be able to perform its wider function of remaining permanently open. Neither the main towns or large settlement areas within Medway or cross-border with Snodland in Tonbridge and Malling will merge.
- Permanent Boundaries: The disused quarries around the northern boundary of the Site provide a permanent, recognisable landscape feature along which to re-draw Green Belt boundaries, and to tie in with existing field boundary boundaries. The field boundaries can be reinforced in a manner that is consistent with recommended landscape character assessments.

1.30 The assessment indicates that by considering only the site rather than the extensive parcel in which it sits, a materially lesser impact on the Green Belt occurs.

1.31 The opportunity at the Medway Works is significant and unprecedented. The site, alone or in-combination with the larger cross-boundary opportunity incorporates a number of benefits identified in other spatial typologies, without the issues that many of those options also exhibit. In particular:

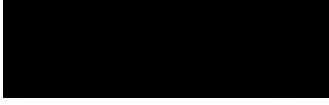
1. The site is under coordinated land control comprising two owners who have entered into a collaboration agreement. Although not a developer, Tarmac has experience of promoting and securing proposals for the after-use of minerals sites for mixed use and residential-led development. Both landowners have an ability to understand long-term objectives in development, restoration and environmental management terms. This offers certainty for the ability to coordinate and deliver development without delay.
2. The site comprises land already subject to planning permission and for which infrastructure has already been implemented. A strategic access already exists serving the site from the A228 at Peter's Bridge. That highways access has capacity to serve the site immediately. Secondary highway access(es) are achievable on land within freehold control.
3. The Peter's Bridge roundabout offers a unique opportunity to provide grade-separated priority access for cyclists and pedestrians, and potentially public transport, which can link to Snodland railway station. Snodland benefits from High-Speed 1 rail services, demand for which will increase with new development – benefitting existing and new users. Access to Halling station will also be possible using existing bridges across the A228 and Medway Valley railway. The site offers demonstrable public transport connectivity ensuring that both local

journeys to the Medway Towns, as well as strategic journeys beyond, can be undertaken using sustainable modes.

4. The scale of development means that the benefits of larger sites can be achieved, with capacity for schools, community services and commercial uses within the development, but also, crucially, sufficient critical mass of population to ensure their viability and sustainability. New facilities can relieve pressures on existing facilities, including local schools, whilst conversely an increased local population can beneficially support existing facilities such as community or social uses.
5. The scale of development also ensures a significant contribution to meeting housing need in Medway, delivering a mix of housing types, sizes and tenures, including opportunities for specialist housing provision. Given the scale of the challenge in meeting Medway's housing need and addressing the acknowledged housing crisis, this is a substantive factor in assessing whether Green Belt release is justified.
6. There are significant opportunities for greenspace and ecological enhancement which offer benefits to new and existing residents. We are confident that Biodiversity Net Gain is achievable and deliverable. The wider scheme offers strategic open space offering a new country park to serve the wider area, and able to relieve recreational pressures on sensitive designated habitats and landscapes.
7. The majority of the stand-alone Medway opportunity, although within the cement work permission boundary, is undeveloped and therefore capable of quick delivery without the need for remediation or ground works. Those parts of the site which have previously been worked, such as at Lees Pit, offer the opportunity for new recreational land uses with enhanced ecological management, providing important recreational resources which can relieve pressure on other areas which may be subject to recreational pressures.
8. The wider site is subject to restoration to open water. The alternative mixed-use development would make better use of land, help to meet housing need, and would deliver enhanced and accessible greenspace serving new and existing residents. There is a compelling case that the alternative development scenario provides a better outcome in the context of the current housing crisis.

1.32 In the context of the above, it is our view that the opportunity at the Medway Works site is able to perform a unique role in addressing need in Medway and shares the advantages of other spatial options, without the disbenefits which the Council themselves identify for those options. The site also performs a role in meeting housing need and addressing community needs in parts of Medway that the other spatial options cannot. The site must be subject to detailed consideration as part of the next stage of evidence base preparation. In particular, the required Green Belt Review must be undertaken at an appropriate scale of analysis. Tarmac is committed to supporting the Council in that endeavour and are preparing detailed evidence in relation to transport, landscape, ecology and housing market which can be shared with the Council and its neighbours in due course.

Yours faithfully,



ARWEL OWEN
PARTNER

Email: 

cc: Tarmac Trading Ltd
Aggregate Industries

31 October 2023



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Medway Council
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Emma Andrews

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Dear Sir/Madam,

REPRESENTATION ON BEHALF OF THE UNIVERSITY FOR THE CREATIVE ARTS IN RELATION TO MEDWAY COUNCIL'S REGULATION 18 (LOCAL PLAN) CONSULTATION

We are instructed by The University for the Creative Arts ('UCA'), to submit representations to the Regulation 18 'Setting the Direction for Medway 2040', which is subject to consultation until 31 October 2023. At this stage the Regulation 18 consultation is a high-level overview of the Council's ambitions, goals and objectives over the emerging local plan period.

In May 2021, UCA announced the closure of their Rochester Campus: Fort Pitt, Rochester, ME1 1DZ ('the site'). It is considered that is the site presents an opportunity for the Council to identify the site as an Urban Regeneration Site and to allocate it for residential development given it comprises a large building within a highly sustainable and well-connected area. The principle of residential redevelopment aligns with the NPPF, which under Paragraph 152 encourages the reuse of existing resources, including the conversion of existing buildings. The principle of residential redevelopment also aligns with Council's emerging visions and objectives which seek to establish Medway as a leading regional city through responding and addressing climate change for a more sustainable future, boosting pride in Medway through quality and resilient development and providing high quality homes that meet the housing needs of Medway's communities, including the retrofit of older properties.

Background

UCA is implementing an ambitious transformation plan to deliver the future of global education. It originally had four campuses in Rochester, Canterbury, Epsom, and Farnham, plus a teaching hub at Maidstone Television Studios, and offers a range of programmes spanning the creative arts, business and technology. In 2021 it opened its first overseas campus in Xiamen, China.

The implementation of the transformation plan will create subject-focussed campuses by 2024 as follows:

- **Farnham** – Games, journalism, graphic design, illustration, photography, communication and media related courses.
- **Epsom** – School of Fashion and Textiles and the Business School for the creative industries.
- **Canterbury** – School of Architecture, Fine Art and design subjects, spatial and computer design and visual communications.

The existing UCA Rochester campus was opened in 1970. Since then, the site owners have sought to maintain the internal and external appearance of the building to sustain its attractiveness for students as a location to study.

As part of the transformation plan, UCA publicly announced changes to and relocated its Rochester campus at Fort Hill in September 2023. Due to the significant size of the existing building and the investment required to

modernise and upkeep the existing building, it is considered unviable for the building to be re-used as a community facility.

UCA has previously identified to the Council that the site will become available and is suitable for residential use through conversion and adaptation of the existing building. Initial architectural capacity studies have been undertaken that demonstrate capacity for approximately 120 residential units.

Site Description and Context

The site comprises a 0.68ha (1.7 acres) brownfield site that is currently in education use (Use Class F1 ‘Learning and non-residential institutions’). Located on Fort Pitt Hill Road, the site is accessed via New Road (A2) and comprises a stepped 9 storey building with car park located adjacent to the east of the building. Situated at the top of Fort Pitt Hill Road, the building is in a prominent position bounded by recreational land to the north, east and west. South is the Fort Pitt Grammar School and Chatham Train Station is approximately 0.7 miles, providing connections to Thameslink and South-eastern railway. Rochester City Centre is also located a short walking distance from the site providing access to nearby shops and services.

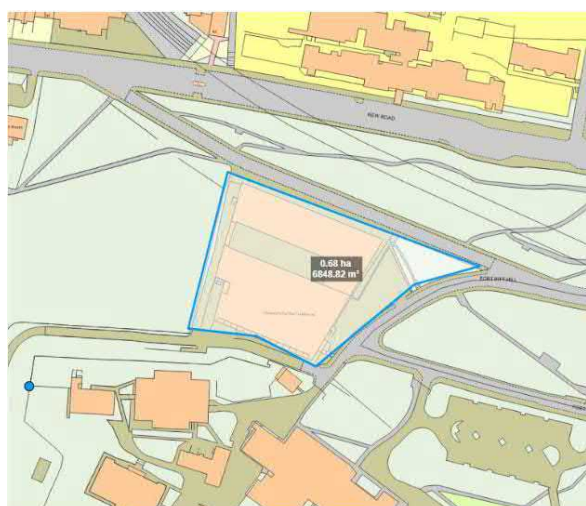


Figure 1: Site Location Plan



Figure 2: Photograph of the Site

Fort Pitt and its original blockhouse historically formed a fortified landmark on the hillside overlooking surrounding towns and the river below. The existing building, while of an unusual, brutalist design, still forms a notable landmark within Medway. The existing building is a representation of the historic form and function of the fort. While this not suitable for modern education use due to the building’s unusual configuration and large size, the building is in an excellent location for housing with expansive views across Medway.

The site is within the ‘Fort Pitt’ Scheduled Ancient Monument (‘SAM’) which was first ordained on 29 May 2009. The building is not statutory or locally listed. It is noted that the site is nearby to the Domestic Science Block for the Fort Pitt Grammar School for Girls which is Grade II listed and is within the New Road Rochester Conservation Area.

The site is surrounded by protected open space to the east and west. It is located within Flood Zone 1 and has a low probability of flooding from rivers and seas.

On 3 March 2022 Medway Council acknowledged receipt of a nomination under section 89 of the Localism Act 2011 (“the Act”) to list the University as an asset of community value. The Council concluded that the application did not demonstrate that there was any community use of the facilities and therefore the nomination was not accepted. On 3 May 2022 the Council confirmed that the land will remain listed on the Council’s List of Unsuccessful Nominations Assets of Community Value for a period of 5 years.

Representations

This next section sets out our representations to the Regulation 18 'Setting the Direction for Medway 2040', particularly commenting on Chapter 5 which details Medway Council's spatial strategy.

As part of the Council's vision over the plan period (2024 - 2040), the Council has set out their commitment to responding and adapting to climate change through providing more sustainable and resilient development. The vision sets out the importance of preserving the "*intrinsic heritage and landscape alongside high quality development to strengthen the areas distinctive character*". UCA recognises the challenges surrounding climate change and the need for innovative design solutions which not only creates more resilience but also respects existing landscape and heritage assets. It is considered reuse of existing buildings aligns with the Council's vision and forms an important part of the wider strategy to address the challenges of climate change, while meeting housing need.

The vision also acknowledges how Medway has capitalised on its '*cluster of higher and further education providers to raise skills levels across the workforce*.' UCA welcomes this recognition for higher and further education providers in providing training and education opportunities in Medway and supports the Council's jobs and skills objective to improve skills of the local workforce and improve graduate retention. However, the Fort Pitt building is not suited to a modern education use and UCA considers there are instances where redevelopment of historic uses will bring better and more sustainable forms of development.

Chapter 4 of the consultation document sets out four strategic objectives for development, which comprise of the following headings:

- Prepared for a sustainable and green future
- Supporting people to lead healthy lives and strengthening our communities
- Securing jobs and developing skills for a competitive economy
- Boost pride in Medway through quality and resilient development

UCA supports each individual objective however seeks to suggest an additional objective committing to the delivery of much needed housing of varying types to meet future demand. This is considered an area which requires strategic planning in order to avoid piecemeal planning and ensure a cohesive approach to development. For this reason, the following objective is suggested: '*Providing homes of varying types to meet demand for Medway and ensure a cohesive sustainable approach*' in accordance with paragraph 20 (a) of the NPPF, which states "*policies are required to set out an overall strategy for pattern, scale and design and make sufficient provision for (but not limited to) housing, including affordable*".

Chapter 5 – Developing a Spatial Strategy

Housing Need

Our client supports the use of the 'Standard Method' to determine the scale of housing need over the plan period. The Standard Method provides an indication on population growth for the region which becomes divisible by areas as well as take into account previous delivery rates. Whilst it is recognised that the Government is undergoing revisions on the National Planning Policy Framework ('NPPF') and the requirement to use the Standard Method is in question, it is considered that at present the Standard Method is the best way to calculate housing growth and need, therefore should be used to inform Local Plan Policies in order to guide future development.

As per the consultation documents, the housing need identified for Medway currently sits at 1,667 homes a year, or around 28,500 over the plan period to 2040. We are of the opinion that as the country currently faces a housing need crisis, it is important for the Council to set clear and measurable objectives for growth and accurately represent the scale of need. As there is no alternative method proposed by the Council, it is considered that the Standard Method is acceptable in setting out growth projections and help guide development. As recognised by Medway Council, there is a desperate need for not only housing, but affordable

good quality housing – therefore, a commitment to delivering a figure over the plan period, informed by the standard method is considered good practice for sustainable development.

Urban Regeneration Areas

The Regulation 18 Consultation document identifies that sites with potential for urban regeneration could provide the capacity for 11,151 homes, representing a significant portion of housing to be delivered over the emerging local plan period. Paragraph 5.19 outlines that “*in drawing up the growth strategy for the new Plan, the Council’s starting point is regeneration and making the best use of vacant or under-utilised brownfield land.*” Brownfield land for the purposes of providing additional housing have been identified in the Urban Regeneration Map which forms part of the Regulation 18 Consultation.

It is considered that the former UCA Rochester site presents an excellent opportunity for inclusion in the Urban Regeneration Map to provide new residential dwellings through the conversion and adaptation of the existing building, making best use of vacant brownfield land.

Architectural studies undertaken for the site details that the proposed reuse of the existing building can deliver a significant number of high-quality residential units with the site capable of accommodating approximately 120 units. The site is located in the urban area of Chatham and is on a brownfield site. Adopted Policy S1 (Development Strategy) is supportive of residential development in the urban area and the re-use of previously developed land and adopted Policy H4 (Housing in Urban Areas) sets out certain development that will be permitted within the urban area including re-use of vacant buildings no longer required for non-residential use. It is considered that the inclusion of the site on the Urban Regeneration Map would be consistent with the objectives of both the adopted and emerging local plan as the reuse and adaptation of the existing building would deliver a significant number of residential units.



Figure 3: Amended Urban Regeneration Map with ‘the Site’ added in red (Medway Council, 2023)

The site is well-located for residential development in an existing urban area in close proximity to existing public transport links with Chatham Train Station located a short walking distance from the site providing connections to Thameslink and Southeastern railway services. Rochester City Centre is also located a short walking distance from the site providing access to nearby shops and services.

In summary, as the site is within the urban area, vacant and in need of a new use, it is considered that the Urban Regeneration Map as presented within the Regulation 18 Consultation document should be amended to include the Rochester Campus, as shown in Figure 3. It is also requested for the Council to consider the site for a residential site allocation which we understand will be developed as part of the next stage of publication of the emerging local plan.

Education Use

Adopted Policy CF1 (Community Facilities) outlines that development which would result in loss of existing community facilities, which includes education use, will only be permitted where it can be demonstrated that exceptional circumstances exist that it would be beneficial to redevelop the site. It is considered that exceptional circumstances apply to the site due to the significant size of the existing building and the investment required to modernise and upkeep the existing building for re-use as a community facility.

Education use covers a wide spectrum of different education types including higher education, schools and further education providers. The needs of the higher education sector are different to the needs for schools and further education providers. The definition of education in the context of community facilities policy should be changed to reference schools and further education only. Planning Practice Guidance for Healthy and Safe Communities (Paragraph 008) outlines that Local Planning Authorities are responsible to allocate sufficient suitable land for schools to meet the need anticipated over the plan period with no reference to higher education. The focus of Paragraph 008 on schools, rather than higher education, evidences that there are clear distinctions for the needs for schools compared to higher education which should be reflected in a revised definition of education in the context of community facilities policy.

As the operation of Higher Education is more closely akin to a business than a traditional school facility, any future policy relating to Higher Education should consider Paragraph 81 of the NPPF which states that planning policies are to create conditions in which businesses can “*invest, expand and adapt*” and this principle of adaption for improvement and continual development should be considered.

Conclusion

In our view, the site presents an opportunity to re-purpose an under-utilised building and to bring forward a site that has the potential to make an important contribution to housing in a highly sustainable location. The character of the site and the surrounding area are suited to residential and have the potential to deliver a high-quality scheme. Therefore, we request the Council allocate the Fort Pitt site for residential development within the emerging Local Plan.

Please would you acknowledge receipt of this representation. We reserve the right to supplement this representation.

Please contact either myself or Ben Tattersall should you have any queries.

Yours faithfully



Emma Andrews
Director



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

By email only: futuremedway@medway.gov.uk

31 October 2023

**MEDWAY LOCAL PLAN 2022-2040 REGULATION 18 CONSULTATION
SETTING THE DIRECTION FOR MEDWAY 2040
REPRESENTATIONS BY ESQUIRE DEVELOPMENTS**

1.0 Introduction

Please find below representations to the Medway Regulation 18 Consultation – Setting the Direction for Medway 2040. The representations are submitted by Esquire Developments, a multi-award winning SME Housebuilder based in Longfield, Kent.

Esquire Developments has land interest across Medway Council and is currently/soon to be delivering sites in High Halstow (35 dwellings), Rainham (46 dwellings) and Cliffe Woods (68 dwellings) and most recently completed a development for 20 Affordable Homes for MHS on Pier Road, Gillingham.

Esquire Developments has a number of future land interests including specifically ‘Fenn Bell Zoo Overflow Car Park’ (LAA Site ID : AS6) for 40 dwellings and as shown in **Appendix I**. ‘Land at Stoke Road, Hoo’ (LAA Site ID: HHH3) for a mixed use development of up to 330 dwellings and commercial uses including offices, a children’s nursery and potential community building as shown in **Appendix 2** and ‘Land at Grain Road Grain, Isle of Grain’ (LAA Site ID: AS25) for approximately 30 dwellings as identified in **Appendix 3**.



Sites AS6 and HHH3 were submitted by Esquire Developments in the previous Call for Sites and substantive explanation of the suitability of those sites was set out in those submissions and thus not repeated in detail here. Both these sites have been subject to recent pre-application meetings and planning applications will shortly be submitted. AS25 was submitted on behalf of the Landowner and since that time Esquire have been identified as the preferred developer. A scheme is currently being prepared to be brought forward.

All the above sites are located within the 'Rural Development' spatial strategy option.

Esquire Developments is a member of the Kent SME Developers Network who have also submitted representations to this consultation. Esquire Developments endorses the representations prepared by the Network. Accordingly these representations should be read in conjunction with the SME Network representations. This includes specifically support for the allocation of a sufficient number of small sites and the introduction of the small sites policy to be part of the emerging Local Plan.

These representations therefore focus on the spatial strategy options and above mentioned sites.

2.0 Comments on the Spatial Options

We note that neither one of the 4 options provides for a sufficient number of dwellings to meet the identified housing needs. Accordingly, it is recognised that a blended approach of 2 or more options will be required. This is especially in the light that it is likely that some sites will be found unsuitable in the further LAA work and the total numbers of houses within each category is likely to reduce.

We recognise that the majority of sites located within Urban Regeneration category will deliver brownfield regeneration sites – a core planning principle supported by Esquire Developments. However, brownfield sites are inherently difficult to deliver and can result in the delivery of unviable schemes or schemes that need to compromise on other policy objectives, such as lack of policy compliant affordable housing. Furthermore, they may also generate only specific housing typologies (flatted schemes) and result in lack open spaces or not meet biodiversity net gain requirements. This could result in the failure to meet the wider policy objectives as identified in the Plan.

It is therefore necessary to balance brownfield regeneration with greenfield development. This will yield a more balanced mix of homes, including family homes. It is considered that a blended approach of suburban and rural development could be pursued, in order to appropriately distribute development across Medway – but with the focus/majority of development sites being the rural development option.

The rural development option is mostly favoured for a number of reasons, but primarily driven by the extensive amount of work that has already been undertaken by the previous local plan and the understanding the Council has for the delivery options in this area. Notwithstanding the removal of HIF funding to help deliver infrastructure, it is still considered that this part of Medway represents the ‘greatest opportunity’ to deliver the greatest amount of growth - with the correct support from capital receipts gained to help deliver the necessary infrastructure that is well understood that is needed to be delivered to absorb this growth and address existing shortcomings in infrastructure provision.

Accordingly, a critical mass of development is required to help achieve the wider and longer term growth scenario on the Peninsula and so the future strategy should include sites across the whole of the Peninsula to help deliver these homes and infrastructure. This should include sites in Hoo (the main focus for growth) with supporting locations/allocations to help maintain the vitality and vibrancy of other villages on the Peninsula, such as High Halstow, Fenn Street, All Hallows and Grain. A greater distribution of sites across the Peninsula will also help share the benefits that development can bring to an area.

Green Belt loss should be considered as part of the strategy only if it represents logical development and the schemes are of exceptional quality and are offering very special circumstances only.

3.0 Fenn Bell Zoo Overflow Car Park (LAA Site ID : AS6)

Appendix I contains an emerging proposal for approximately 40 dwellings on Land at Fenn Bell Zoo overflow Car Park. The site is enclosed by residential and commercial development and is bound by the Ratcliffe Highway. There are a number of urbanising features impacting the site, including part of the use of the site as an overflow car park for Fenn Bell Zoo.

The emerging proposals are for 40 smaller dwellings (2-3 bed) to meet the demands of first time buyers and the delivery homes that are more affordable for local people. Crucially, the development of the site will also result in enabling community related benefits, notably on the Fenn Bell Pub/café and the Fenn Bell Zoo itself. This will include the delivery of sustainable sources of energy supply, new pens and vet rooms and upgrades to the zoo infrastructure. These investments, generated by the proposed housing will ensure the zoo can invest in these community related projects associated and secure its long term future – particularly helping deliver educational facilities to local schools and students.

The emerging scheme will therefore deliver a substantial community benefit that is unique to Fenn Bell and come forward with a development that seeks to deliver homes for local people, including the provision of first homes. This scheme will also deliver biodiversity net gain and substantial landscape buffers. The scheme is also being delivered by and SME developer.

Accordingly the scheme will wholly accord with the 3 pillars of the NPPF’s definition of sustainable development delivering social, environmental and economic benefits.

4.0 Land at Stoke Road, Hoo (LAA Site ID: HHH3)

Land at Stoke Road as shown in **Appendix 2** has been identified as part of the previous Hoo Development Framework consultation document in connection with the wider Hoo growth proposal. The site sits to the south of Stoke Road and extends from the existing edge of Hoo (the adjacent field having received Outline planning permission of 100 dwellings) and extends towards Jacobs Lane and beyond.

The information submitted to the call for sites was extensive and not repeated here, by the scheme in Appendix 2 can deliver approximately 330 dwellings including policy compliant affordable housing plus commercial uses for up to 22,000sqft which could include offices, gym, a children’s nursery, retail, open spaces and landscaping.

The site represents a logical extension to Hoo and is located in an area whereby traffic can be directed away from the village along the Ratcliffe Highway to exit the Peninsula. Accordingly, only local, purposeful trips to Hoo village will be generated.

In addition, the site can deliver a number of alternative non-residential uses (it is noted that the LAA document has not reflected this in the published forms and we request that this is rectified to reflect more accurately what is being proposed). Crucially this means that site can generate and deliver local employment opportunities as well as other social benefits, such as a café/community hub, children's nursery and potentially, given its location on a main bypass, a small retail provision.

The Council should acknowledge that bringing forward large scale developments in and around Hoo over the plan period will require a phased approach and that it should remain focused on delivering the long term vision by the end of the plan period. It should therefore take the opportunity of what is available to be brought forward immediately now, knowing that the Local Plan will encourage and direct the areas to come forward over the longer term.

5.0 Land at Grain Road, Grain Isle of Grain (LAA Site ID: AS25)

Land at Grain Road also presents a good opportunity to deliver homes in a location which would benefit from small scale appropriate level development. The site would comfortably accommodate approximately 30 dwellings and is a logical extension to the village of Grain – which due to nearby employment opportunities, is likely to attract existing and future workforce to relocate to this part of Medway over the coming years.

The site would be a logical extension to the village and being brought forward by an SME, would help set a design bar within the village for future development if it were brought forward early in the local plan period/process. Esquire Developments are currently preparing such a scheme.

There are no legal or physical constraints to the site and it is considered that the site could be brought forward immediately. Its scale would have limited impacts on the wider village (i.e. highway network or impact on local infrastructure) and it would deliver Affordable Housing in the local area.

It therefore presents an excellent opportunity for allocation and would support the focus of the rural area strategy that helps distribute development across the Peninsula.

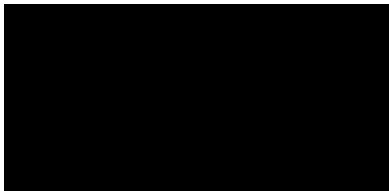


The above 3 sites therefore all represent sustainable, suitable and deliverable sites all being brought forward by an SME housebuilder with an excellent track record of design and delivery in Medway. They each offer a development that is bespoke to that area and offer the opportunity to enhance and grow these locations in a positive way that complements the local character and area.

If you have any questions, please do not hesitate to contact me.

Yours sincerely

Andrew Wilford



**Head of Land and Planning
Esquire Developments**

Appendix 01: Fenn Bell Zoo Overflow Car Park (LAA Site ID : AS6)

Appendix 02: Land at Stoke Road, Hoo (LAA Site ID: HHH3)

Appendix 03: Land at Grain Road Grain, Isle of Grain (LAA Site ID: AS25)

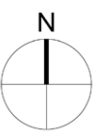


APPENDICES



Appendix 01:
Fenn Bell Zoo Overflow Car Park (LAA Site ID : AS6)

Note: Site not surveyed by On Architecture Ltd. Information provided by others. Subject to survey, confirmation of legal boundaries and site visit.



ON ARCHITECTURE

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Client Details
Esquire Developments Ltd

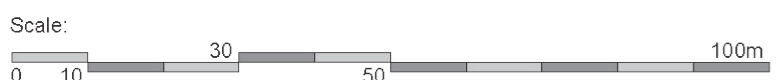
Project Title
Proposed Residential Development,
Land at Fenn Bell Zoo, Fenn Street, Rochester

Drawing Title
Indicative Sketch Site Layout

Scale	Date	Drawn	Checked
1:1000@A3	Sep 2023	KY	RDT

Project Number	Drawing Number	Drawing Revision
23.018	SK03	A

Canterbury Studio: Logan House, St Andrews Close, Canterbury, CT1 2RP



Indicative Sketch Site Layout

Proposed Residential Development, Land at Fenn Bell Zoo, Fenn Street, Rochester



Appendix 02:
Land at Stoke Road, Hoo (LAA Site ID: HHH3)

NOTES
Do Not Scale
Report all discrepancies, errors and omissions.
Verify all dimensions on site before commencing any work on site or preparing shop drawings.
All materials, components and workmanship are to comply with the relevant British Standards, Codes of Practice, and appropriate manufacturers recommendations that from time to time shall apply.
For all specialist work, see relevant drawings.
This drawing and design are copyright of Clague LLP.
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Rev	Date	Description



Project Title
**Proposed Residential Development
Land at Stoke Road
Hoo St Werburgh**

Drawing Description
Proposed Sketch Scheme
Total = 329 Residential Units

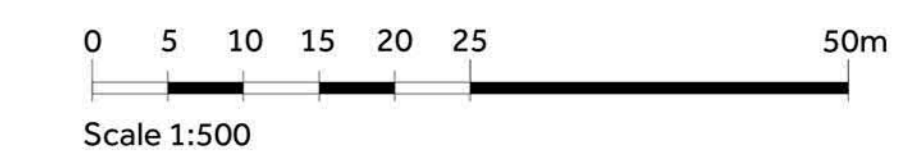
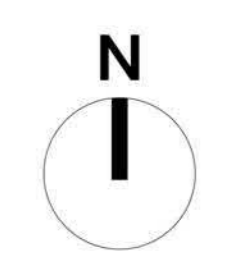
Scale	Drawn by
1:500@A0	JS
Date	Checked by
June 2021	TVM

CLAGUE ARCHITECTS

62 Burgate, Canterbury Kent CT1 2BH	01227 762060
2 Kinsbourne Court, Luton Road, Harpenden, Hertfordshire AL9 5BL	01582 785102
8, Disney Street London SE1 1JF	0203 597 6112

CANTERBURY LONDON HARPENDEN

Drawing Number	Revision
30157A / SK01	

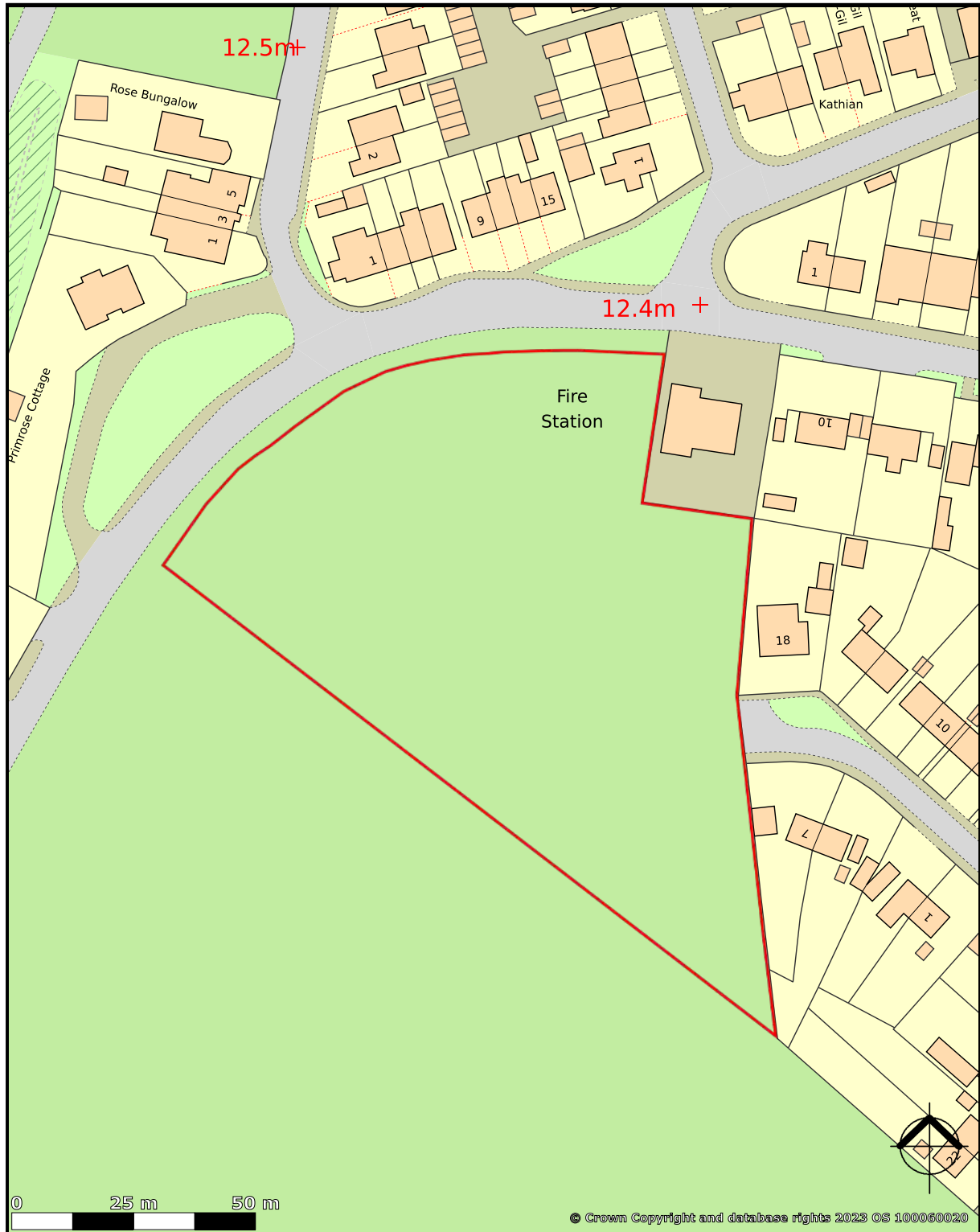


Proposed Residential Development, Stoke Road, Hoo St Werburgh



Appendix 03:
Land at Grain Road Grain, Isle of Grain (LAA Site ID: AS25)

Land East of Coronation Road, Isle Of Grain,
Rochester, ME3 0DA

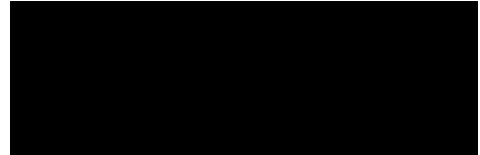


created on **edozo**

Plotted Scale - 1:1,250



Network Rail



Via email: futuremedway@medway.gov.uk

30 October 2023

Dear Sir/Madam

NETWORK RAIL RESPONSE TO MEDWAY COUNCIL LOCAL PLAN (REGULATION 18) CONSULTATION

Thank you for providing Network Rail the opportunity to make comment on the Regulation 18 version of the Medway Local Plan.

It is important that opportunities to promote the use of the railway as a more sustainable modes of transport are identified and taken forward. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. As a matter of course, proponents of sites which are close to the railway boundary or sites which could affect the railway asset directly are required to engage with our Asset Protection and Optimisation team (ASPRO).

Network Rail has comments which we hope are of use to the Council and are keen to assist where possible to deliver these. As identified within the literature supporting the consultation, Medway have a substantial housing need to be met over the Plan period. Given the outline of the standard methodology, it is incumbent on Medway to seek to meet this identified need as far as possible. This requires the Council to 'leave no stone

untreated' in seeking to identify opportunities for housing and is clearly a key challenge and priority for the new Local Plan.

One of the most sustainable locations for housing provision is around transport nodes, such as railway stations, and the Council should give due consideration to these opportunities. Network Rail can support the Council on this should this assistance be sought. Additionally, it is vital that the transport infrastructure required to support the level of growth that Medway are required to meet is fully considered and is identified as a key priority for the Plan.

Rail network in Medway

The stations at Strood, Rochester, Chatham and Gillingham provide excellent connectivity between these Medway towns. The connectivity also provides access into London, either to London Bridge or to Abbey Wood through the Elizabeth Line. There are clear opportunities to enhance rail connections on the Hoo Peninsula however the withdrawal of Housing Infrastructure Funding (HIF) has made the prospect of a new station and a more regular passenger service, linking to the Isle of Grain difficult to achieve. Should Medway pursue the level of housing delivery that has been set out for the Hoo Peninsula in the consultation documents, then the opportunity to provide the enhanced passenger links could continue to be pursued.

Development Growth

Network Rail notes the possible development locations that the Council have included to support the consultation. The level of housing need for the Medway area is significant and the Council should be credited with the identification of land to support c38,000 homes as this reflects a desire to plan positively. However, as this is broken down, there will clearly be some constraints that will result in sites either not being able to be brought forward or not to the quantum that was initially envisaged when developing the sources of housing supply.

Urban regeneration - could provide the capacity for 11,151 homes

Network Rail notes the above approach and the opportunities that could be brought forward for regeneration of the Medway towns. This approach provides for consideration of higher densities and taller buildings, as appropriate, to maximise development opportunities within the urban centres. Focusing development in close proximity to the rail stations would provide both regeneration opportunities to improve access to the stations and encourage the uptake of the rail network, therefore reducing car dependency. Network Rail would encourage the Council to carefully consider this approach and the opportunities that could be provided as a result. The work being undertaken on the Chatham Design Code, with the rail station at the heart of this, provides an opportunity to be a catalyst for improved station access and general improved public transport linkages. Medway benefits from high-speed rail and this is a highly attractive proposition for commuters and leisure travellers for the Kent region and wider into south London. It is noted however the potential constraints of this approach however Network Rail are keen to lend support as required to assist Medway in pursuing this approach.

Additionally, there are opportunities around Gillingham station that could be pursued as part of this approach. Currently, the car parks around the station cover a large land area and a rationalisation of this could provide available land to be re-developed, potentially for housing, whilst not sacrificing the amount of parking for commuters and other users of the station. This also lies close to one of the station entrances which will allow users to access the station more easily.

Similarly, opportunities to better connect Gillingham for pedestrians and cyclist could also be considered as part of this approach which may lessen the need for as much station car parking as is currently provided however this will need to be carefully considered.

Suburban expansion - could provide the capacity for 9,680 homes

This approach would help to further meet housing need however is less well connected to public transport although could generate opportunities to improve these linkages. Development closer to the A2 could result in an increased car dependency, and as such, consideration should be given as to how this development could support the use of the rail network as part of first and last mile concepts as well as ensuring the rail network remains an attractive alternative to the use of the car. Rainham station could be a focus for these improvements and Network Rail would encourage the Council to develop an effective means of capturing developer contributions to allow for these to be re-invested in improving the rail network because of development under this approach. A specific policy focusing on capturing developer contributions for the rail network would assist greatly in this and Network Rail would encourage the Council to include within the new Plan.

Rural development sites - could provide capacity for 14,736 homes

The Hoo Peninsula provides an opportunity to allow for a significant proportion of Medway's housing needs to be provided however this will require the relevant infrastructure especially transport, to be provided to ensure good connectivity. Previously, funding was available to support the provision of the transport infrastructure however, seemingly with that unavailable, a new approach will have to be taken. It would be challenging to maximise housing provision on the Hoo without this investment. Network Rail have had on-going discussions regarding restoring a passenger service to the Isle of Grain, which included the provision of a new station and upgrading of signalling on the route. Other interventions, including electrification and double tracking of the railway could also be investigated further should the development opportunities on the Hoo be an option that the Council fully commits to. This approach is also considered within Network Rail's long-term rail planning as part of the North and East Kent Connectivity Study (2023)¹.

Green Belt release - could provide the capacity for 2649 homes

This approach could provide some, albeit limited contributions to Medway's housing supply when compared with the other approaches outlined above. The impacts on the sensitive landscape designations within the wider area need to be taken account of. It is noted that there is overlap with Gravesham and the Lower Thames Crossing with regard to development opportunities. The Lower Thames Crossing would likely lead to more car journeys brought about by the improved connections however this could also lead to increased congestion on local roads, especially should more development be brought forward nearby.

Employment sites

The provision of employment sites on the Hoo Peninsula, especially at the Isle of Grain would minimise the land take for other development in the Medway Towns or other parts of the Green Belt. As referred to in our response above, there are opportunities to pursue rail improvements on the Hoo Peninsula. The existing freight route to Grain encourages

¹[North and East Kent Connectivity Study \(2023\)](#)

the distribution of goods on the rail network rather than on the strategic road network which is limited. Network Rail have developed concept and feasibility work on the provision of the Medway Curve at Hoo Junction Yard and there are generally opportunities to improve freight capacity through the Medway Towns. Network Rail would suggest the Council develop an approach to encourage the use of the rail network for moving freight to reduce large vehicle/HGV movements on the strategic road network and more local roads through Medway. Inclusion of a suitable Policy to support freight would help to make the Plan sustainable and encourage the maximisation of the public transport networks. Network Rail would be able to work with the Council to develop such an approach.

Level crossings

There are a significant number of level crossings within Medway, many of which are located on the Hoo Peninsula. Should the Council pursue development opportunities that increases the interaction of members of the public with level crossing on the rail network, then closure or mitigation of such crossings should be a consideration within the new Plan. This would not block development but would need to be identified as an important consideration when developing site allocations or taking a decision on planning applications. Network Rail suggest that this would take the form of inclusion of a specific Policy focused on level crossing safety and mitigations as required arising from development or inclusion of this within a relevant Policy, within the Plan. It is noted that where a level crossing supports a Public Right of Way that this would be the responsibility of Kent County Council however it would be beneficial to have a supporting policy for this within the Medway Plan.

As the experts in rail safety, Network Rail would be able to support the Council in developing an effective approach which ensures the safety of residents and other users without compromising the safe and efficient running of the railway.

Summary

The rail network within Medway provides an excellent basis to pursue development opportunities and to promote sustainable transport as a genuine alternative to using the car. Additionally, Network Rail would encourage Medway to include the rail network as a key priority/opportunity within the new Local Plan and to develop policies and site allocations which promotes the rail network in encouraging its usage and pursue development opportunities.

Network Rail are keen to continue to work with the Council and other stakeholders in helping to deliver transport and infrastructure improvements for the benefit of residents of Medway.

I trust the above is of use and if there any issues raised that needs further discussion then please do not hesitate to contact me.

Kind regards,

Craig Hatton MRTPI
Senior Town Planner



**MEDWAY LOCAL PLAN
(SETTING THE DIRECTION FOR MEDWAY 2040)
REGULATION 18 CONSULTATION
REPRESENTATIONS**

Prepared on behalf of Uniper Ltd

October 2023

On behalf of **Uniper Ltd**

Document Control Sheet

Project Name: MedwayOne, Kingsnorth
Project Ref: 33567/A5/HH/
Report Title: Representations to Medway Local Plan Regulation 18 Consultation

	Name	Position	Signature	Date
Prepared by:	Hardeep Hunjan	Associate Planner	HH	October 2023
Reviewed by:	Huw Edwards	Director	HE	October 2023
Approved by:	Huw Edwards	Director	HE	October 2023
For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

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Appendices

APPENDIX 1	FORMER KINGSNORTH POWER STATION SITE LOCATION PLAN
APPENDIX 2	GRAIN POWER STATION

1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Uniper Ltd in response to Medway Council's Local Plan (Setting the Direction for Medway 2040) Regulation 18 Consultation published in September 2023. Uniper is progressing the redevelopment of the former Kingsnorth Power Station site and also own the Grain Power Station and therefore have a direct interest in the Local Plan and the long-term development strategy for Medway.
- 1.2 The **former Kingsnorth Power Station** is an extant employment allocation (Policy S12: Kingsnorth) within the adopted Medway Local Plan (2003). The Plan identifies Kingsnorth as a 'Strategic Development' with the potential for Class B2 (Industrial Development) and Class B8 (Storage and Distribution) development.
- 1.3 Uniper secured Outline Planning Permission in August 2023 for redevelopment of the former Kingsnorth Power Station site (known as **MedwayOne**) for a range of employment uses (Outline Planning Permission ref. MC/21/0979). Reserved Matters Applications for the detailed design of development plots and the infrastructure estate road, associated lighting, landscape, drainage and ecological areas are now being prepared by Uniper and occupiers. A site location plan is included at **Appendix 1**.
- 1.4 The site was submitted to the Call for Sites exercise undertaken in February 2023 (Site ID: HHH36).
- 1.5 **Grain Power Station** forms part of the existing employment allocation for the Isle of Grain (Policy S13) as identified within the 2003 Medway Local Plan. The policy allows for Class B1 (Business) (now E(g)), Class B2 (General Industry) and Class B8 (Storage and Distribution) Uses.
- 1.6 The Grain Power Station site is currently in use as a Combined Cycle Gas Turbine (CCGT) and combined heat and power (CHP) plant and was acquired by Uniper in 2011. The wider site has potential for further Energy and B2/B8/E(g)(iii) Uses. The site was submitted to the Call for Sites exercise (Site ID: AS26) undertaken in February 2023. A site location plan is included at **Appendix 2**.
- 1.7 Both Sites are longstanding existing employment allocations within the extant Medway Local Plan (2003) and comprise brownfield sites. MedwayOne is due to deliver the first units in 2024/2025, subject to approval of Reserved Matters Applications. Anticipated timescales for commencement of delivery for Grain Power Station are likely to be within the early part of the new Local Plan period.

1.8 These representations focus on the strategic issues that are associated with the redevelopment of the Former Kingsnorth Power Station (Appendix 1) and future re-development proposals at the Grain Power Station (Appendix 2).

1.9 Notwithstanding our Client's specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework [NPPF] (September 2023) and National Planning Practice Guidance [NPPG] (March 2014, as amended).

i) Content of Representations

1.10 The consultation document and the strategy for the preparation of a new Local Plan, has been assessed on the basis of National policies as set out in Section 2.0. These representations are structured as follows:

- Section 2.0 – National Planning Policy;
- Section 3.0 – Response to Consultation;
- Section 4.0 – Conclusions.

2. National Planning Policy & Strategic Policy

i) National Policy & Plan Making

2.1 The NPPF (September 2023) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. (Paragraph 8)

2.2 Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- Local Plans should meet objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted. (Para 11)

- 2.3 The NPPF notes that the planning system should help create the conditions in which businesses can invest, expand and adapt. Accordingly, significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. (Para 81).
- 2.4 To meet these objectives, Para 82 directs that planning policies should:
- Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
 - Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 - Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
 - Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.
- 2.5 Furthermore, planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. (Para 83)
- 2.6 LPAs should ‘submit a plan for examination which it considers is “sound” – namely that is:
- Positively prepared – the plan should be prepared based on a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – the plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
 - Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant. (Para 35)

2.7 The NPPF requires that Local Plans should:

- be prepared with the objective of contributing to the achievement of sustainable development;
- be prepared positively, in a way that is aspirational but deliverable;
- be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation; and
- serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). (Paragraph 16).

2.8 Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. (Para 22)

2.9 Furthermore, strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies). (Para 23)

2.10 The NPPF directs that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. (Para 31)

ii) National Planning Practice Guidance

2.11 The National Planning Practice Guidance (NPPG) builds on the principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance.

2.12 The NPPG provides guidance to support LPAs in objectively assessing and evidencing development needs including economic development. A robust evidence base will need to be

developed, in liaison with the business community, to understand their current and potential future requirements. An assessment of the appropriate functional economic market area; existing employment land stock; recent pattern of employment land supply and loss; evidence of market demand; wider market signals and evidence of market failure will need to be undertaken. [Para: 026 Ref ID: 2a-026-20190220]

- 2.13 In relation to ensuring sufficient land is allocated for logistics, the NPPG notes that an assessment of need should be informed by engagement with logistics developers and occupiers to understand the changing nature and requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies; analysis of market signals including trends in take up and the availability of logistics land and floorspace across the relevant market geographies; analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies. [Para: 031 Ref ID: 2a-031-20190722]
- 2.14 The NPPG confirms the relationship between the work of the South East Local Enterprise Partnership (SELEP) and LPAs within the planning process:

The commitment of local planning authorities to work collaboratively with Local Enterprise Partnerships across their area will be vital for the successful delivery of policies for strategic growth in their Local Plans. An effective policy framework for strategic planning matters, including local or aligned planning policies, will be a fundamental requirement for this” [Para ID:9-006-20160519]

iii) **Planning for Growth Written Ministerial Statement (March 2011)**

- 2.15 Ministerial Statements represent material considerations in the context of policy evaluation. The Written Ministerial Statement ‘Planning for Growth’ (March 2011) remains relevant and sets out the steps that the Government expects local planning authorities to take to ensure that the planning system does everything it can to help secure a swift return to economic growth.
- 2.16 The Written Ministerial Statement incorporates the following provisions:
- The Government’s clear expectation is that the answer to development and growth should wherever possible be ‘yes’, except where this would compromise the key sustainable development principles set out in national planning policy; and
 - When deciding to grant planning permission local planning authorities should take into account the need to maintain a flexible and responsive supply of land for key sectors,

including business; consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies and ensure they do not impose unnecessary burdens on development.

a) South East Local Enterprise Partnership

- 2.17 The South East Local Enterprise Partnership (SELEP) is the business-led public/private body established to drive economic growth across East Sussex, Essex, Kent, Medway, Southend and Thurrock. The LEP is one of 38 partnerships set up by the Government to be the key body determining strategic economic priorities while making investments and delivering activities to drive growth and create local jobs.
- 2.18 The SELEP Economic Strategy Statement (2018) notes that analysis of SELEP's industrial mix indicates that it has considerable diversity – both at the level of the LEP overall, and within its four economic areas. At the level of the LEP overall, two sectors – construction and transport and logistics – stand out as having particularly high relative concentrations of employment (reflecting the scale of the South East's growth agenda and its 'gateway location'.
- 2.19 Strategic infrastructure priorities for transport are noted including the proposed Lower Thames Crossing and it is recognised that it is important that a scheme of this size maximises the potential benefits and minimises the impacts on local business and communities. The Strategy notes that the Lower Thames Crossing will provide more than 90% additional road capacity across the Thames east of London.
- 2.20 The South East LEP was previously in the process of preparing a Local Industrial Strategy (LIS) to set out broad priorities, aligned with the National Industrial Strategy and the evidence that supports it. This work has since been incorporated into the Economic Recovery and Renewal Strategy (March 2021) which recognises the economic impact of the Covid-19 pandemic together with the UK leaving the EU and seeks to provide a plan for economic recovery and growth. The impact of these events has resulted in an estimated potential reduction of £10bn GVA for the SELEP economy within the South East of England. The South East LEP has made a number of commitments to their partners and business community to understand the impacts on the economy, to inform Government on what the South East needs, and to take clear and decisive action to support businesses to adapt and support a path to renewal. This includes through attracting and encouraging more commercial investment into the South East, as well as public funding to create jobs now and secure growth in the future.

2.21 The Economic Recovery and Renewal Strategy highlights the SELEP's commitment to 'clean growth' by rebuilding the economy through boosting local carbon industries while cutting emissions in the move to the UK's 2050 net-zero carbon target. In this regard, the SELEP is working with Coast to Capital and Enterprise M3 to create an Energy Strategy for the South East which will encourage the growth of the low carbon sector for jobs, skills and prosperity and help to deliver on the Government's Ten Point Plan for a green industrial revolution. ¹

b) Thames Estuary 2050 Growth Commission

2.22 The Thames Estuary 2050 Growth Commission was set up to develop an ambitious vision and delivery plan for North Kent, South Essex and East London. The Commission defines these areas into City Ribbon, Inner Estuary, South Essex Foreshore, North Kent Foreshore and the River Thames. The vision for the Thames Estuary 2050 places a focus on developing strong and specific sectors; connecting to and enhancing natural assets and green infrastructure; and planning for long term and resilient development.

2.23 The vision aims to deliver:

- 1.3 million new jobs;
- £190 billion* additional GVA;
- At least 1 million new homes.

* Assuming an annual average growth rate of 1.25% at current GVA per job.

2.24 The Site is located within an area described in the Commission's report as 'North Kent Foreshore', which includes Medway, Swale, Canterbury and Thanet. The Hoo Peninsula is noted within the reports as one of the key priority areas for the Commission and an 'Area of Change'. The report states that there are significant opportunities for growth and development of the North Kent Foreshore.

c) Kent and Medway Growth and Infrastructure Framework (2018 update)

2.25 The Kent and Medway Growth and Infrastructure Framework (GIF) has been prepared by Kent County Council (KCC) to provide a strategic view of emerging development and infrastructure requirements to support growth across Kent and Medway. The GIF aims to provide a strategic framework across the County, for identifying and prioritising investment across a range of infrastructure, for planned growth up to 2031.

¹ The Ten Point Plan for a Green Industrial Revolution (Building back better, supporting green jobs, and accelerating our path to net zero). Published November 2020

- 2.26 The 2018 update to the Kent and Medway GIF – A 2050 Picture of Kent and Medway predicts that £16.4 billion investment in infrastructure is required to unlock the growth potential of the area. The document provides four different scenarios depending on Kent and Medway’s growth trajectory, demonstrating challenges and opportunities.

3.0 Response to Consultation

i) Vision for Medway

- 3.1 We support the economic vision for Medway, and it is encouraging to see that the strategic importance of the former Kingsnorth Power Station and Grain Power Station sites is recognised as a key part of delivering the economic growth within Medway across the Plan period. The vision for Medway places a strong emphasis on delivering growth which responds and adapts to climate change, providing for more sustainable and resilient development. It is positive that the vision recognises the challenges faced by climate change and we note that the MedwayOne development and future proposals at Grain Power Station will support the delivery of these objectives through the delivery of sustainable energy generation uses and high-quality modern employment development for industrial, manufacturing and storage and distribution uses with integrated sustainability measures and use of renewable energy.
- 3.2 The vision sees the MedwayOne and Grain Power Station sites on the Hoo Peninsula as being “transformed into thriving economic hubs” by 2040. We welcome the recognition of the strategic role that these key sites will play in delivering Medway’s economic vision on the Hoo Peninsula.
- 3.3 The MedwayOne development will provide a vital contribution towards strategic growth, generating over 2,000 jobs and delivering £48 million economic output per annum once the site is fully occupied. The energy hub will generate electricity and heat using fuel derived from waste which will be used on site and off site. The development will also provide for a network of blue and green infrastructure across the site, provision of 10% biodiversity net gain, and inclusion of renewable energy across the wider site. A package of financial contributions towards sustainable travel and highways improvements has also been secured as part of the permission to mitigate the impact of the development.
- 3.4 The redevelopment of both Sites will be closely aligned with the principles of sustainable development as set out within the NPPF and supported within the consultation document in the following ways: -

Social

- Support the delivery of sustainable communities by providing local employment opportunities alongside planned housing growth;
- Enhancing access to local employment opportunities through the provision of additional new floorspace; and
- Help residents to enjoy a better quality of life and address social inequalities through access to new additional jobs.

Environmental

- Will make the most efficient use of brownfield land, reducing the need for greenfield release;
- Will provide employment opportunities alongside planned strategic housing development on the Peninsula, reducing the need for residents to travel long distances to access employment opportunities;
- The Sites could support energy uses and in respect of Grain Power Station, the transition to a net-zero energy system through carbon capture; and
- The Sites are located in defended flood zone 3 and development will not increase the risk of flooding on or off the Site.

Economic

- Will contribute to meeting the employment needs in the District;
- Will improve the provision of jobs and business to reduce unemployment;
- Contribute to increasing the number and variety of businesses in Medway through the provision of new employment/commercial floorspace;
- Encourage inward invest through the provision of new floorspace promoting further growth;
- Provide local employment opportunities to serve the needs of the local community and planned strategic development on the Peninsula.

3.5 The consultation document recognises that there is significant potential for strategic housing growth on the Peninsula across the Plan period. Bringing forward both housing and economic development within this location would provide future residents with local employment opportunities, reducing levels of commuting out of the local area and supporting sustainable travel patterns. The redevelopment of both MedwayOne and the Grain Power Station sites would support this, contributing to the creation of sustainable development/communities. However, a vital part of unlocking this future growth will be to ensure that key infrastructure is provided to support the levels of growth envisaged. This includes major transport network improvements and investment in public transport infrastructure.

ii) Securing jobs and developing skills for a competitive economy

3.6 We support the strategic objectives set out under this heading and note that MedwayOne and Grain Power Station sites will provide for high quality employment floorspace that meets commercial requirements from occupiers.

3.7 We welcome the recognition that the delivery of infrastructure will be required to provide accessible employment locations to support business growth. Furthermore, key strategic transport infrastructure priorities are highlighted within the consultation document including the Lower Thames Crossing and improvements to M2 Junction 1.

iii) Development Needs

3.8 Para. 5.7 identifies critical transport infrastructure constraints which may hinder growth including capacity and safety concerns identified by National Highways at M2 Junction 1. The consultation document recognises that this Junction falls outside of Medway and it is encouraging to hear that Medway Council is working with neighbouring authorities and wider stakeholders to prioritise action on delivering a solution for improvement works to this junction. The NPPF (para. 24) places a duty to co-operate on such strategic transport issues which cross boundaries and therefore Medway Council should ensure that it works together with Gravesham Borough Council and National Highways to identify a junction improvement scheme to ensure that issues with junction capacity do not constrain growth.

3.9 Presently, the Outline Planning Permission for MedwayOne is restricted on the initial number of peak hour traffic movements that can be generated from the Site due to the potential theoretic highway impact upon Junction 1 of the M2 expressed by National Highways. The theoretical impact relates to the level of committed development which may affect capacity at this junction. The initial trip cap may be exceeded where analysis demonstrating acceptable effects at Junction 1 of the M2 is agreed with National Highways or a scheme for enhancements to Junction 1 of the M2 and a programme of delivery is agreed with National Highways. We understand that Medway Council will be preparing a Strategic Transport Model and Assessment to support the new Local Plan and part of this work will include developing an outline design for Junction 1 of the M2.

3.10 It is clear that a solution needs to be identified to address capacity concerns at Junction 1 of the M2 in the short-term in order to ensure that growth is not constrained both for current developments with planning permission (including MedwayOne) and future growth across the Plan period. National Highways has indicated that strategic solution is required through the Local Plan process.

3.11 In order to realise Medway's development growth over the Plan period, significant investment in transport infrastructure will have to be made. Furthermore, with the recent Government announcement that HIF funding will no longer contribute towards the key strategic infrastructure programmes that were planned to support growth on the Hoo Peninsula, it will be even more important that the Council ensures that a robust plan to facilitate the growth envisaged over the Local Plan period is identified.

iv) Employment Sites

- 3.12 We welcome the identification of the (2003 Local Plan) extant strategic employment sites at Grain and Kingsnorth on the Hoo Peninsula as set out within para. 5.57. The Employment Sites map 5 provides an overview of potential employment site allocations which have been identified within the Land Availability Assessment (September 2023).
- 3.13 The map shows several potential employment sites to the northwest of the MedwayOne site, located on greenfield land. The NPPF notes that 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 as set out within the NPPF. Furthermore, LPAs are required to give 'substantial weight' to the value of utilising valuable brownfield land and "support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land". (Paras 119 – 120)
- 3.14 The comprehensive redevelopment of the former Kingsnorth Power Station and future proposals for Grain Power Station are prime examples of the regeneration of brownfield sites, fully aligned with the approach set out within the NPPF (para. 120(c)) to prioritise development on brownfield land. As part of the decommissioning of the former Kingsnorth Power Station, Uniper has made significant investment into remediating contaminated land to support future development.
- 3.15 Whilst we are supportive of the Council identifying sufficient sites in order to meet the District's future employment needs over the Plan period, it is important to accord with the NPPF insofar as any extant 2003 brownfield allocations are fully utilised before the release of any new greenfield allocations. It is important that future potential allocations on the Hoo Peninsula do not undermine the success of sites which already have planning permission including MedwayOne. Furthermore, the Local Plan should consider how employment land can be appropriately phased to ensure that development on brownfield land can be prioritised. This is particularly important for the following reasons:
- the greenfield land that has been identified for potential employment uses as part of the Land Availability Assessment is relatively unconstrained and requires less financial investment to develop than MedwayOne, which is remediating and regenerating contaminated brownfield land;
 - MedwayOne is located on an existing allocated employment site within the adopted Local Plan. The principle of employment development in this location is therefore already well established and the recent grant of Outline Planning Permission reaffirms this;
 - Without the phasing of future employment land on greenfield sites this would undermine the progress of development at MedwayOne because employment development of (cheaper) greenfield land over brownfield sites could be more commercially attractive for potential occupiers.

- 3.16 The same general principles relate to Grain Power Station in terms of prioritising redevelopment of a brownfield site over greenfield land.
- 3.17 The consultation document notes that “*the plan is to consider the need for more employment floorspace for businesses.*” (para.5.56) and that “*the Medway Employment Land Assessment, 2020 indicated a need for c 62.3 hectares of employment land up to 2037.*”
- 3.18 We **support** that a comprehensive review of employment land needs will be undertaken to forecast the employment land requirements over the entirety of the Plan period up to 2040. This will ensure that sufficient sites can come forward and at a sufficient rate to address objectively assessed needs over the Plan period in line with para. 23 of the NPPF.
- 3.19 The Employment Land Needs Assessment (ELNA) (October 2020) recognises that Medway lies within an area of significant interest for logistics operators. However, Medway has experienced much lower levels of growth within the distribution sector as traditionally locations within Thurrock, Dartford and Swale have attracted occupiers due to a large supply of land and port accessibility. Although the report recognises that there has been an expansion in the sector, including recent development at the London Medway Commercial Park on the Hoo Peninsula. The re-development of the former Kingsnorth Power Station site and future development proposals at Grain Power Station will make a significant contribution to meeting Medway’s employment needs over the Plan period.
- 3.20 The ELNA has assessed various different scenarios for future employment need including impact upon the supply chain from delivery of London Resort at Swanscombe Peninsula. However, since the report was produced, the planning application for London Resort has been withdrawn and there is uncertainty as to the project’s delivery, particularly within the short-term and the early part of the Plan period. It is considered that the ELNA evidence base should be refreshed to take this into account and to ensure that it is robust given that it has been 3 years since the report has been produced and the impact of the Covid-19 pandemic on employment growth is now known.

4.0 CONCLUSIONS

- 4.1 The Regulation 18 Local Plan (September 2023) has been produced by Medway Council seeking to address its growth needs until 2040.
- 4.2 We support the overall vision for sustainable economic growth to meet Medway’s employment needs as set out within the consultation document but it is clear that this strategy will need to be supported by relevant updates to the previous economic evidence base and the ELNA to ensure that it accurately reflects Medway’s employment land needs over the entirety of the Plan period.
- 4.3 We consider that it is important to ensure that future employment allocations are appropriately phased to ensure that there is a clear strategy that gives substantial weight to the best possible use of brownfield land and prioritises the use of brownfield over greenfield land to meet identified employment needs.
- 4.4 The key strategic infrastructure needs have been identified and Medway Council should work closely with key stakeholders including Gravesham Borough Council and National Highways to identify an appropriate improvement scheme to address capacity issues at Junction 1 of the M2 in order to ensure that future development on the Hoo Peninsula including MedwayOne and development at the Grain Power Station is not unduly constrained.
- 4.5 Both sites at the former Kingsnorth Power Station and Grain Power Station will play a key role in realising Medway’s vision for economic growth, inward investment and employment generation and the policy framework for these sites within the next iteration of the emerging Local Plan should ensure that there is sufficient flexibility to support future development.

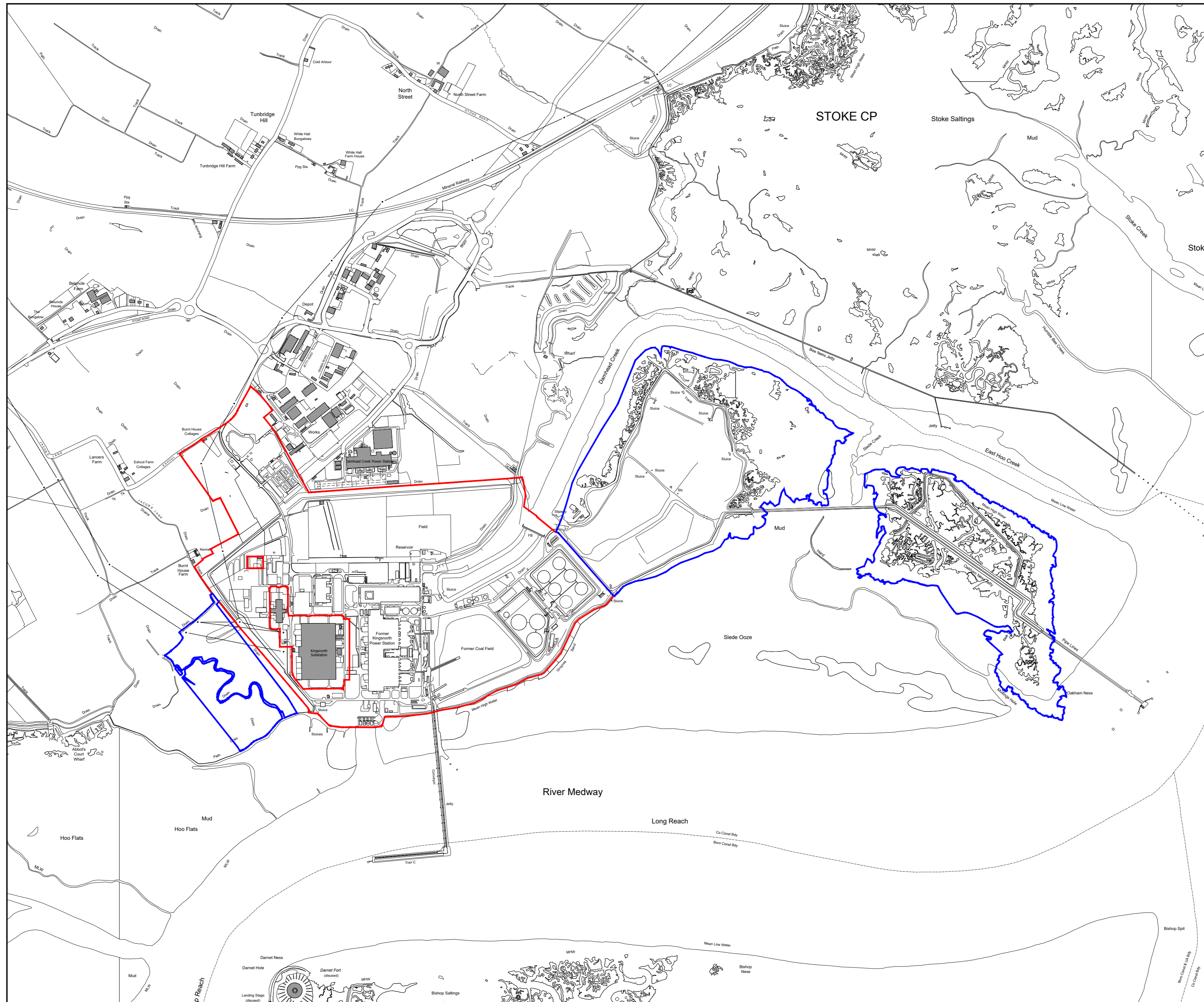
APPENDIX 1

FORMER KINGSNORTH POWER STATION SITE LOCATION PLAN

The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
C Site Boundary Updated	15.01.21	SM	EH

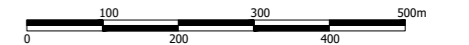
- Site Boundary
111.00Ha / 274.29Ac
- Land Under Ownership
115.89Ha / 286.37Ac



Project
MedwayOne

Drawing Title
SITE BOUNDARY PLAN

Date	Scale	Drawn by	Check by
15.07.20	1:10000@A2	S.M.	E.H
Project No	Drawing No	Revision	
29497	RG-M-20	C	



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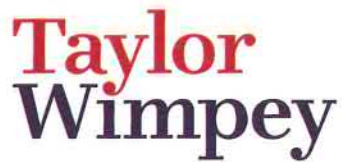


Offices at Birmingham Bristol Cambridge Cardiff Ebbwfleet Edinburgh
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APPENDIX 2

GRAIN POWER STATION SITE LOCATION PLAN





Planning Policy
Medway District Council
Gun Wharf
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Chatham
Kent
ME4 4TR

For the attention of Catherine Smith

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Via Email to futuremedway@medway.gov.uk

31st October 2023

Dear Ms Smith,

Medway Local Plan – Setting the Direction for Medway 2040
Representations on behalf of Taylor Wimpey

We are writing in response to Medway Council’s Regulation 18 Local Plan consultation “Setting the Direction for Medway 2040”.

Taylor Wimpey has a major land interest within the District - at Land West of Hoo – extending to approximately 75 Acres (30.5 Ha) north of Main Road and east of A228 Peninsula Way. Taylor Wimpey is also part of the wider Hoo Consortium, which has, alongside individual representations, submitted joint representations in response to the current consultation.

These representations will not repeat or seek to reiterate the commentary prepared on behalf of the Hoo Consortium - instead focusing specifically on the land that Taylor Wimpey owns West of Hoo.

As part of the Consortium, Taylor Wimpey have been working closely with the Council over many years to achieve its ambitious vision and growth aspirations for the Hoo Peninsula. We are keen to continue working with the Council to enable delivery of a “Sound” Local Plan which achieves the housing, employment, social and physical infrastructure needs of the District in full.

Taylor Wimpey supports the Council’s commitment to this plan-making process and its ambition to progress towards submission stage in line with the approved Local Development Scheme.

Moreover, we support the Vision and Strategic Objectives identified in the Regulation 18 consultation, which looks to establish the District as a regional leader in terms of its economy and quality of life through delivery of a people-centred plan.

Cont.d

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We believe development in the right places can address the key issues identified in the Regulation 18 consultation and help improve the quality of life for existing and future residents of the District. The spatial option of “Rural Development”, specifically development on the Hoo Peninsula, will be critical to achieving this.

The Hoo Peninsula is the only genuine location where coordinated and comprehensive development could be delivered which addresses a sizable portion of the District’s needs over the Plan-period whilst also being of the scale to accommodate all social, environmental and physical infrastructure to create a new sustainable self-contained community.

Land West of Hoo

Taylor Wimpey’s interest in Land West of Hoo (the Site, **illustrated at Annex 1**) is located on the western settlement edge of Hoo St Werburgh with the A228 dual carriageway (Peninsula Way) to the north-west. The Hundred of Hoo Primary School and the Hundred of Hoo Academy are located immediately to the south.

The Site forms part of the “West of Hoo St Werburgh Neighbourhood” in the Council’s draft Hoo Development Framework (HDF) consulted on in 2022, alongside land to the east / north-east being promoted by Gladman Developments (and subject to a live planning application) and land to the south of Main Road being promoted by Dean Lewis Estates.

The West of Hoo St Werburgh neighbourhood is proposed to accommodate a significant number of new homes alongside a new neighbourhood centre.

Taylor Wimpey is committed to bringing forward a scheme on the Site which achieves the Council’s aspirations and delivers a high-quality landscape-led, mixed-use scheme which includes general market and affordable housing delivery, public open spaces, wildlife areas and mixed use accommodation for both community and retail use.

Further, any development on the Site would facilitate the delivery of wider development on the Peninsula through provision of a new link road to the adjoining Gladman Development’s site and proportionate financial contributions towards any necessary off-site infrastructure including local highway improvements, increased school, community and health capacity as well as ecological mitigation.

An emerging masterplan for the Site is included in **Annex 2** which demonstrates how the Site could sensitively accommodate development of:

- Around 450 residential dwellings, including affordable homes, with a range of housing types and sizes;
- A Local Centre comprising up to 1,000sqm of commercial and community floorspace;
- Provision of allotments and formal sports area for community use;
- Extensive multi-functional green infrastructure and public open space throughout the Site including sustainable urban drainage features and children’s play facilities;

- Improved off-site pedestrian facilities along Main Road.
- Access from Main Road, via a new fourth arm to the existing roundabout, plus access from Ratcliffe Highway; and
- Creation of a new link road through the Site to connect to Gladman Development's proposals to the north-east to facilitate new bus services.

The Site is owned by Taylor Wimpey - a national housing developer with a proven track record of development delivery in the District.

The Site is not subject to any constraints which would potentially impact the deliverability of the proposed development.

The Site is "suitable", "available", and "achievable", and housing can be delivered during the first 5 years of the Plan, subject to planning consent.

It is therefore a "deliverable" site which should be supported by the Council to achieve its housing, economic and environmental needs set out in the emerging Local Plan.

Summary

As set out above and within the wider Consortium Representations, we consider the Council should progress with a spatial strategy which focuses growth at the Hoo Peninsula. This should be supported by an updated Hoo Development Framework which supports a long-term vision for the Peninsula that looks further ahead than the Plan period.

The Site can form a vital phase in the Council's delivery of its aspirations for the Hoo Peninsula and the growth needs of the emerging Local Plan.

We look forward to continuing to work with the Council through this Plan-making process to ensure a "Sound" Plan is delivered which meets needs in full.

Should you have any questions or comments, please do not hesitate to contact me as per the details below.



John Kelly MRICS
Strategic Project Director
Taylor Wimpey UK Limited



Annex 1 – Site Plan



Annex 2 – Emerging Masterplan

