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26th October 2023

Via email: futuremedway@medway.gov.uk

Dear Sir/Madam

RESPONSE ON BEHALF OF McCARTHY STONE TO THE MEDWAY LOCAL PLAN 2022- 2040 REGULATION 18 CONSULTATION SEPTEMBER 2023

Thank you for the opportunity to comment on the Medway Local Plan 2022 – 2040 Regulation 18 Consultation September 2023. McCarthy Stone is the leading provider of specialist housing for older people. Please find below our comments, which specifically addresses the need for specialist housing for older people and the benefits such housing can bring.

National Policy Context

Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.

In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:

*"The need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; **by mid-2041 this is projected to double to 3.2 million**. Offering older people a better choice of accommodation to suit their changing needs can help **them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems**. Therefore, an understanding of how the ageing population affects housing needs is **something to be considered from the early stages of plan-making through to decision-taking**" (emphasis added).*

Paragraph 003 Reference ID: 63-003-20190626 recognises that:

"the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support."

Thus, a range of provision needs to be planned for. Paragraph 006 Reference ID: 63-006-20190626 sets out:

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“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”

Therefore, the Local Plan should recognise that housing for older people has its own requirements and cannot be successfully considered against criteria for adaptable and accessible general family housing.

Need for Housing for Older People

It is well documented that the UK has an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to 5 million (ONS mid 2018 population estimates).

It is generally recognised (for example, within the Homes for Later Living Report September 2019). That there is a need to deliver **30,000 retirement and extra care houses a year in** the UK to keep pace with demand.

The age profile of Medway can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 44,209 persons aged 65 and over in 2018, accounting for 15.9% of the total population of the Council area. This age range is projected to increase by 14,401 individuals, or 32.6%, to 58,610 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 20% of the total population by 2043.

In 2018 there were 10,835 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 7,877 individuals, or 72.7%, to 18,712 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of Medway’s residents, accounting for 3.9 % of the total population in 2018 and increasing to 6.4% by 2043.

This increase in the population of older people is supported by the Medway Council Local Housing Needs Assessment 2021, August 2021 (HNA) which at para 5.9 states *‘over the period 2021 to 2037, the number of people aged 65 and over is expected to increase by 25.6% and by 2037 there will be an additional 11,700 residents aged 65 and over. Over the period 2021 to 2040, the additional number will be 12,460, a 27.3% increase’*. In addition the HNA at Table 5.5 provides an *‘analysis of future need for specialist olde person accommodation to 2040’*, this identifies that there is an additional need for 939 more specialist houses to meet the needs of older people projecting forward the current prevalence rate.

It is therefore clear there will be a significant increase in older people and the provision of suitable housing and care to meet the needs of this demographic rather than purely just adaptable homes or reliance on down-sizing should be a priority of the emerging Local Plan.

Benefits of Housing for Older People

Older Persons’ Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

Economic

A report *“‘Healthier and Happier’ An analysis of the fiscal and wellbeing benefits of building more homes for later living”* by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- ‘Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.

- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.’

A further report entitled *Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a ‘knock-on’ effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report *“Chain Reaction” The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)* reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

Social

Retirement housing gives rise to many social benefits:

- Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder
- Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.
- The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

Environmental

The proposal provides a number of key environmental benefits by:

- Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.

Recommendations

The 2018 population projections from the Office for National Statistics shows a large increase in the population over the age of 65. For this reason and the requirements of the PPG, the Council should ensure specialist housing to meet the needs of older people is addressed and that older person’s housing is not confused with wheelchair accessible housing, Lifetime Homes or specialised housing.

The best approach towards meeting the diverse housing needs of older people is **for the plan to:**

- **Identify the older person’s housing need.**
- **Allocate specific sites to meet the needs of older people that are in the most sustainable locations close to key services.**
- **Include a standalone policy actively supporting the delivery of specialist older people’s housing with good access to services and facilities for older people.**

Developers of older person’s housing schemes should not be required to demonstrate need given the significant need identified and the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments *“help reduce costs to the social*

care and health systems” (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.

While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:

“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.

The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”

We would remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that *“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan”* (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council’s planning obligations and building requirements should therefore be robust.

We would also like to remind the Council that the viability of specialist housing for older people is more finely balanced than ‘general needs’ housing and we are strongly of the view that these housing typologies should be robustly assessed in any forthcoming Local Plan Viability Assessment. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. *A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.* If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.

We would direct the Council towards the Retirement Housing Group’s paper entitled ‘A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013 (‘RHG Briefing Note’) available from <https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf>. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods.

The Council must therefore ensure that an up-to-date viability assessment is undertaken to inform the future plan. The new viability assessment must include a number of typologies that includes older person’s housing and if older person’s housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing.

Thank you for the opportunity for comment.

Yours faithfully

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Our ref: NH/23/03227

Your ref: Medway Local Plan 2040: Regulation 18
Consultation

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[REDACTED]
31 October 2023

FAO: Catherine Smith
Planning Manager - Policy
Medway Council

Dear Ms Smith,

Medway Local Plan 2040 – Regulation 18 Consultation

Thank you for the email notification of 13 October 2023 inviting National Highways (NH) to comment on the 'Medway Local Plan 2040: Regulation 18', seeking a response by no later than 23:59 on Tuesday 31 October 2023.

We welcome the opportunity, as a statutory consultee, to be positively involved with the making of the Medway Local Plan. We look forward to engaging with you throughout the plan-making process so that we can both understand the interaction between land use designations and the impacts on road safety and future performance of the Strategic Road Network.

We appreciate that the Regulation 18 Plan is the first stage of plan-making, introducing the main issues. We recognise that the intention is to submit the Local Plan for examination during 2024 which means the Plan would be examined against the requirements of the current planning regime.

Our response below has been informed by the following government policy and guidance:

- National Planning Policy Framework (NPPF) (September 2023)
- Department for Transport (DfT) [Circular 01/2022: Strategic road network and the delivery of sustainable development](#) (23 December 2022)
- Planning practice guidance on plan-making
- Planning practice guidance on Strategic Environmental Assessment and Sustainability Appraisal

In addition, our response has been shaped by [NH's updated Planning Guide](#) published in October 2023. This sets out how NH engages with the planning system, in the context of the expectations of Circular 01/2022 and the NPPF.

In terms of NH's projects and priorities, we have also had regard to the government's [Road Investment Strategy 2 \(RIS2\): 2020-2025](#), and our published documents:

- [Connecting the country: our long-term strategic plan to 2050](#)
- [Strategic Road Network Initial Report: 2025-2030](#)
- [Route Strategies](#) which are a rolling programme setting out our plan for the SRN which inform RIS.

As a scene-setting exercise, we have provided (below) the current policy context for the Strategic Road Network.

Strategic Road Network (SRN) - Policy Context

NH is responsible for the Strategic Road Network (SRN), with our focus being on its safety, reliability, and operational efficiency. NH expects the plan-making process to explore all reasonable options to reduce reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel [Circular 01/2022, para.19].

New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth [Circular 01/2022, para.12].

Circular 01/2022 expects planning, including the making of local plans, to set outcomes communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including ‘vision and validate’, ‘decide and provide’ or ‘monitor and manage’) [para.15].

In support of delivering these objectives, we will provide guidance and seek to agree the transport evidence as the Plan progresses.

The remainder of this response is split into the following headings:

1. Evidence
2. Sustainability Appraisal
3. Vision and Strategy
4. Roadmap
5. Future engagement

1. Evidence

We have noted that the Regulation 18 Plan is not supported by any published transport evidence: https://www.medway.gov.uk/downloads/200542/medway_local_plan_2040.

However, we understand that Medway Council is working on the scoping of the required evidence. We look forward to working with you on this as it emerges.

We note from the Local Development Scheme and the published online roadmap for the Local Plan, that the next stage of plan-making is the detailed Regulation 19 Plan prior to submission. Ahead of the publication of the Regulation 19 Plan, NH would expect to see a robust and appropriate transport evidence base responding to the expectations of national policy. The NPPF expects local plans to be underpinned by a clear and transparent evidence base [para.31].

We would expect, at the very least, baseline strategic transport modelling highlighting conditions in the current base year and the future baseline (2040, end of plan period), taking account of background growth and committed developments. This would benefit this current stage (Regulation 18) of plan-making because it would identify where the hotspots are across the SRN and the Local Road Network (LRN). This should consider impacts beyond the boundary of the authority. This evidence can help inform and shape the reasonable strategy options and, therefore, the preferred strategy option.

We are keen to work with you in the process of identifying suitable locations for development that make best use of the capacity on the SRN, but this does need to be informed by robust evidence. We welcome the recognition in the Plan of capacity issues across parts of the SRN, including M2 Junction 1.

2. Sustainability Appraisal

Related to the issue of evidence is the Sustainability Appraisal (SA). It is our understanding that this process for the Medway Local Plan 2040 has reached the initial stage of preparation and consultation upon the Scoping Report. According to the [Strategic Environmental Assessment Regulations requirements checklist](#) published by the government, the SA process should have completed the following tasks by the time of the Regulation 18 Plan consultation:

- Tested the Local Plan objectives against the sustainability appraisal framework

- Developed the Local Plan options including reasonable alternatives
- Evaluated the likely effects of the Local Plan and alternatives
- Considered ways of mitigating adverse effects and maximising beneficial effects
- Proposed measures to monitor the significant effects of implementing the Local Plan

This evidence is not available. We have noted earlier SA reports online, but these do not relate to the current Medway Local Plan 2040.

The SA outputs are important considerations for understanding the impacts of the Plan and emerging spatial strategy options on transport and accessibility (SA objective 10). NH would look to the SA for evidence of how the Plan would deliver the principles of sustainable development include reducing the need to travel by the car and supporting more sustainable, active travel alternatives.

Given that the roadmap does not highlight a part 2 Regulation 18 Plan consultation ahead of the detailed Regulation 19 Plan, it is difficult to understand the influence of the SA process on plan-making including the environmental, social, and economic effects of the overall spatial strategy options and the justification for the preferred option. There does not appear to be a programmed opportunity for statutory consultees such as NH to comment on the interim SA findings and what they mean for the spatial strategy options and how these impact on the SRN.

3. Vision and Strategy

We welcome the inclusion of a vision for Medway in 2040 [section 3 of the Plan]. In particular, the section on travel choices and infrastructure which states:

Improved travel choices and infrastructure have reduced the use of the car across Medway, with people benefitting from better provision for pedestrians and cyclists, and a greater public transport offer. This has transformed how people move through the central urban areas and strengthened the connections with wider neighbourhoods and villages.

This is supported by NH and should form an integral part of the refined vision. This is in line with the expectations of Circular 01/2022 and the NPPF.

However, the Plan does not include a range of reasonable strategy options or a preferred option and how and when it would be delivered and by whom. Furthermore, it does not include detailed policies.

We have noted that the Plan highlights the potential for residential development at different locations (urban regeneration, suburban growth, rural development, Green Belt loss) but there is no indication of how these elements will piece together and form spatial strategy options.

This makes it very challenging for NH to understand how the strategy options for the Plan would relate to the SRN. Furthermore, it makes it difficult for judgements to be made about how the spatial strategy options would help deliver key sustainable development policies in the NPPF and Circular 01/2022 including reduced car dependency and the promotion of walking, wheeling, cycling and public transport.

As highlighted above, we need to agree the relevant transport evidence to understand the potential impacts of the spatial strategy options on the SRN ahead of the detailed Regulation 19 Plan being published. Therefore, it may well be that the plan-making process would benefit from an additional stage, possibly a Regulation 18 part 2. This could present to local communities and statutory consultees a range of reasonable spatial strategy options so that all parties can understand how they perform against the SA framework and, in our case, how they would impact on the SRN.

4. Roadmap

The Regulation 18 Plan is 29 pages long. The Plan does not include spatial strategy options, detailed policies, or preferred sites for new development. According to the Council's website, the next stage in the process will be the detailed, specific Regulation 19 Plan. Our concern is that given the lightness of this Plan and the next stage in the process, the roadmap to submission is lacking detail with insufficient milestones for statutory consultees such as NH to be fully involved with plan-making.

If stakeholders such as NH are to effectively engage with this process, we need to understand how the Plan is evolving, including the basis for decision-taking. This requires a staged approach whereby reasonable strategy options are introduced, evidenced and subject to the SA process. This transparent iterative process would allow all parties to understand what is being proposed, the likely environmental, social, and economic

impacts this would have, including the impact on vital infrastructure such as the SRN, and the justification for policy decisions.

5. Future engagement

As highlighted at the beginning of this response, NH is keen to engage with the plan-making process for the Medway Local Plan 2040. We will work with officers on the transport evidence that is needed to support the Plan as well as provide guidance on meeting the expectations of Circular 01/2022.

To help manage and document this process, we would welcome the development of a Statement of Common Ground between Medway Council and NH. It would be helpful if this is considered earlier rather than later so that accurate records can be kept of our engagements, demonstrating how we have worked together constructively, actively, and on an ongoing basis to address strategic transport matters relating to the SRN.

Once you have had an opportunity to consider all of the representations received, we would be pleased to meet with officers at Medway Council to discuss transport related matters and find a way forward to address the concerns we have expressed.

If you have any questions with regards to the comments made in this response, please do not hesitate to contact NH via PlanningSE@nationalhighways.co.uk

Yours sincerely



Nigel De Wit

Assistant Spatial Planner

South East Region Operations Directorate

Email: planningse@nationalhighways.co.uk

headley, andrew

From: Bex Moorhouse [REDACTED]
Sent: 07 October 2023 10:13
To: futuremedway
Subject: Future Medway

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

Hi All

I have just watched the fabulous recap on you tube, for The Future Medway plan, and will try to get down to the consultation session in Chatham, as I am a local resident in Rochester and would love to see these changes taking affect.

Like all participants in the call, I love living in Medway, however it could be an incredible place to live with more investment and of course less antisocial behaviour.

When people are happier and healthier, they display less of these issues and so I wanted to add that I think you could overlay more wellbeing into these plans, below are a few quick ideas – but feel free to connect with me separately if I can help?

1. Active cities are so important – so I wanted to see more plans for planned run routes and using the mentioned boardwalks to connect Chatham to St Mary's Island along the river (current frustration is the dockyard stops this resulting in a polluted walk or run along the road).
2. Could the river be used more – transport between locations – even if just pop up – Rochester to Hoo etc
3. Opening more cycle paths and access to rental bike scheme for family's. Or partnering with a local provider to see if they would run pop up's – cycle king etc.
4. Swimming pools – where pools are closed, and hubs are created (like the strand) direct bus routes to them or obvious ways that people in Rochester who can't drive can get to these spaces.
5. More planting of tree's – like happen's in Rochester High Street but not on other high streets.
6. Outdoor training areas for people to use – that actually look beautiful without the need for the rusty equipment which we did see when the riverside in Rochester was accessible.

I also would like to see a more strategic view of how the towns that make up Medway become destination areas in their own rights – so residents start to travel more between, them. If we are all to be truthful, there are certain areas we probably just don't travel too now, how do we address this?

Chatham – could be a Shoreditch or Margate type location (attractive to young professionals moving out of London as they no longer need to commute 5 days a week)

Rochester – independent, high end (historical story telling) – could activities from here move instead to chatham – with more space when the paddock opens?

Thanks

Bex

Bex Moorhouse
Founder & Director – Invigorate Spaces Ltd





Via email only to futuremedway@medway.gov.uk

Planning Department

Ask for: [REDACTED]

Telephone: [REDACTED]

Email: [REDACTED]

My ref:

Your ref: Reg 18 Consultation

Date: 3 November 2023

Dear Catherine,

Gravesham Borough's Response to Medway Local Plan 2022 – 2040: Regulation 18 Consultation – Setting the Direction for Medway 2040 (September 2023).

Thank you for consulting Gravesham Council on your Medway Local Plan 2022-40 Regulation 18 document, the content of which is noted. The focus of our response is on the key issues that relate to strategic cross boundary issues.

As previously discussed under the duty to cooperate, Gravesham is also in the process of updating its own Local Plan, with the Core Strategy having been adopted following examination, in November 2014. However, the Local Plan Core Strategy was only found 'sound' subject to Main Modifications recommended by the Inspector that the Council should (amongst other things) re-assess its local housing need figure; release a greenfield site at Coldharbour Road for housing, to meet short term needs; and undertake a Green Belt review to identify additional housing sites, given the lack of available land supply within the constrained urban area. The Council accepted this and resolved unanimously to adopt the document at its meeting held 30 September 2014.

Since that time, Gravesham has sought to put together a robust evidence base against which options for accommodating development needs could be assessed and has undertaken a series of public consultations, including a Regulation 18 (Stage 1) consultation between April and July 2018 and a Regulation 18 (Stage 2) consultation between October and December 2020.

This has been against a background of shifting national planning policy, including the introduction by Government of the 'Standard Method' as the starting point for assessing minimum local housing need under the then National Planning Policy Framework (2018).

The effect of this has been to significantly raise the levels of development that Gravesham is expected to accommodate from the 6,170 dwellings for the period 2011/28 or an average 363 per annum to 701 dwellings per annum based on the Standard Method (2022 based on Turley calculations). This equates to a total figure of around 10,500 dwellings over a full 15-year Local Plan period, set against a diminishing supply of deliverable and developable sites within the urban area and rural settlements inset from the Green Belt moving forwards.

Aside from the constraints limiting where development might be accommodated in Gravesham (such as the North Kent Marshes SPA/Ramsar, which coincide with areas of high flood risk and the Kent Downs AONB), the Lower Thames Crossing project has added another layer of local uncertainty, delay and cost, with the Council having to demonstrate to National Highways that any

planned growth will not harm the functioning of the Strategic Road Network and that any harm considered to be unacceptable, can be mitigated by proposed development.

Should the Lower Thames Crossing be granted a Development Consent Order (DCO) and go ahead, it will cause significant disruption and dislocation to the east side of Gravesend, and insufficient modelling has been published by National Highways, to date, to demonstrate what this impact maybe.

The position that Gravesham finds itself in therefore is that, as a starting point, it is required to seek to deliver through its Local Plan levels of housing development determined through the imposition of the Government's 'Standard Method.'

Whilst national policy allows for alternatives, any deviation from the 'Standard Method' would require special justification through the demonstration of exceptional circumstances at examination. Attempting to show that different population projections are indicative of a lower level of local housing need are not likely to be considered 'exceptional' given that the same process could be undertaken elsewhere, undermining the Government's stated intent to deliver 300,000 additional new homes per annum nationally.

In terms of meeting absolute housing numbers, which have effectively been imposed by Government through application of the Standard Method, Gravesham, under the Government's current planning framework, will be required to consider Green Belt release to accommodate development and weigh this against whether policies in the NPPF provide a strong reason for restricting the overall scale, type or distribution of development or any adverse impacts of delivering development at that scale would significantly and demonstrably outweigh the benefits (NPPF, 2023 paragraph 11(b)).

For the sake of completeness, it is also necessary to add that the potential need to release Green Belt land for development in Gravesham is not driven purely by numbers but also the type and tenure of housing that high density urban sites can deliver.

The urban sites being promoted would primarily deliver 1 -2 bed flatted market / build to rent units and not 3 – 4 bed family housing or policy compliant levels of affordable housing. In addition, there remain issues over the viability of the high-density urban sites, which would cause problems in terms of demonstrating the necessary 5-year deliverable housing supply on adoption of the Local Plan.

Gravesham is also keen to ensure that its development strategy is design-led and that future schemes are appropriate to context, avoiding -urban cramming to ensure high quality design in both town and country. For this reason, it has commissioned work on a design code, which will be consulted on in due course.

In accordance with NPPF paragraph 141, Gravesham is obliged (amongst other things) to approach neighbouring authorities to ask whether they can meet some of our need before releasing Green Belt land for development through the demonstration of 'exceptional circumstances'. In the absence of this, 'exceptional circumstances' would not exist. Gravesham has therefore approached both Medway and Dartford Councils in this respect, as we lie within the same Housing Market Area, unlike Sevenoaks, Tonbridge and Malling and Thurrock (as neighbouring authorities) do not, as demonstrated by previous Strategic Housing Market Assessments and ONS data on internal migration.

It is noted that the technical work being undertaken for the emerging Local Plan will test whether there is scope to accommodate around 2,000 additional dwellings from Gravesham, although this is a notional figure that has not been subject to agreement at this stage.

Gravesham welcomes this reference to our request to consider meeting some of the development needs of this area which could only otherwise be met through Green Belt release in Gravesham. This is clearly an important Duty to Co-operate issue which Medway is approaching in a positive, proactive, and on-going way, irrespective of the outcome.

On this, Gravesham also recognises the difficulties that Medway may be facing because of the Government's withdrawal of Housing Investment Fund (HIF) monies for Hoo Peninsula and implications that this may have not only for meeting its own development needs but also potential unmet needs in Gravesham. An unintended consequence of the withdrawal of this funding under these circumstances may therefore put added pressure of Gravesham to release more Green Belt land than might otherwise have been the case.

For information and the avoidance of doubt, Gravesham is currently still undertaking technical work, including the transport modelling referenced above, to inform its decision on how to take forward its Local Plan strategy options.

The scale, form and distribution of development proposed through Gravesham's emerging Local Plan will be a matter for Members to decide through due process and will be subject to a Regulation 19 public consultation and examination in due course. No decision has yet been made on whether to meet full development needs against the tests set in NPPF paragraph 11(b), when consideration will also have to be given to a range of other factors.

In the interim, Gravesham extends an invitation to work closely with Medway to develop our respective Local Plans in relation to cross-boundary strategic issues and areas where we can help each other in terms of a shared evidence base or approaches to site allocations and master-planning. This should include discussions on the impacts of development which are in close proximity to our boundary on infrastructure and services, for example the potential impact of development in Hoo upon the transport infrastructure in Higham.

As per sections 28 and 33(A)(6) of the Planning and Compulsory Purchase Act 2004, we both must consider whether there are opportunities for planning jointly or even developing a joint Local Plan. It is unlikely that the latter would be appropriate in this instance, particularly because Gravesham is a second-tier authority and Medway a unitary authority, with differing responsibilities. This may also have implications in terms of making the plan-making process more complex, adding unnecessary delay.

Once again, many thanks for inviting Gravesham to comment on your Regulation 18 consultation document.

Yours sincerely

[Redacted signature]

[Redacted name]

[Redacted title]

Catherine Smith
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Chatham Maritime
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ME4 4YH

Our ref: KT/2006/000047/CS-06/PO1-L01

Date: 09 November 2023

Dear Catherine,

Medway Local Plan Regulation 18 Consultation – Setting the Direction for Medway 2040, 19 September 2023.

Thank you for consulting us on your Regulation 18 document ‘Setting the Direction for Medway 2040’. We have the following comments to make.

The environmental issues and opportunities that we consider important to Medway’s Local Plan are:

- Flood risk
- Climate change
- Waste management
- Groundwater and contaminated land
- Water resources
- Water quality
- Biodiversity

We have provided detailed comments on these issues and opportunities in relation to your vision, strategic objectives and spatial strategy.

Vision for Medway in 2040 (Section 3)

Biodiversity

We welcome your vision for “a resilient green infrastructure network” however, we would encourage your vision to be broadened to incorporate blue infrastructure, in line with your objective “To secure a robust green and blue infrastructure network across land and water” (Section 4.2). We recommend the term “blue-green infrastructure” is used consistently to support the inclusion of urban infrastructure relating to water. These are both equally important sources of biodiversity and, if managed together, will have a cumulative benefit for the wider area and its residents. This is especially important for an Authority such as Medway, with low-lying coastal

areas, aiming to be “defined by its river and estuaries”. We recommend policies that promote the re-naturalisation of riverbanks and streams for biodiversity, flood risk and public connection to nature.

We support your vision recognises Medway as a place where “Important wildlife and heritage assets are protected and enhanced” and further that “Thames estuaries are valued landscapes and habitats are in good condition.” Medway comprises many different habitats which continue to play a vital role in mitigating and adapting to climate change, whilst simultaneously contributing to an improved quality of life for residents. We welcome policies that place importance upon biodiversity within the area, in line with this aspect of your vision.

In support of the vision and objectives set out in your Local Plan Reg 18 document, we would like to highlight the value of [Nature Based Solutions \(NbS\)](#). If well designed and robustly implemented, NbS can deliver multiple benefits to people and ecosystems.

Climate change

We support your vision considers Medway as a place “where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets”, with a commitment to “responding and adapting to climate change, providing for more sustainable and resilient development.” Climate change underpins many of the environmental issues within our remit, so we expect to see the implementation of policies that reflect this aspect of the vision, with specific mention of mitigation and adaptation measures.

Climate change poses an increasing risk of flooding across the Medway Towns designated for future development, as well as the internationally important habitats located to the north. As such, we welcome the reference to “reducing the risk of flooding” in your vision. Prioritising flood and coastal risk management is essential, with a focus on enhancing the quality of defences throughout the lifetime of any development. We expect to see policies that reflect the significance of the impacts of climate change within your local plan, and we provide further guidance on this in the following section.

Waste

We are pleased to see that waste management is part of your vision, noting that “Waste is managed as far up the Waste Hierarchy as possible to achieve a more circular economy.” Future development of nearly 30,000 homes (Section 5.12) will inevitably bring more waste to the area. We agree that waste management must be a priority when implementing the policies and growth strategy in the new plan.

Strategic Objectives (Section 4) and Spatial Strategy (Section 5)

Flood Risk

We are pleased to note that being “prepared for a sustainable and green future” is identified as a strategic objective of Medway’s Local Plan, with an aim to ‘reduce the risk of flooding’. The Local Plan offers a great opportunity for sustainable

management of flood risk and flood defence requirements to be linked to Medway's strategic planning.

The River Medway and its estuary make up a significant part of the Medway Council area, and we are pleased to note that the Local Plan will place a focus on enhancing the river environment. Flood modelling and mapping held by the Environment Agency (EA) and included within Medway's Strategic Flood Risk Assessment (SFRA) clearly shows areas at risk of flooding.

Medway Estuary and Swale Strategy

We are currently working on the delivery programme for the Medway Estuary and Swale (MEAS) Strategy. The MEAS Strategy sets out our plan for the management of flood risk and coastal erosion over the next 100 years. It aims to deliver a sustainable approach to flood risk management, and to plan and deliver adaptation to climate change and rising sea levels. However, whilst this is an EA plan, we cannot deliver it alone, and we will need to work in partnership with Local Authorities and third parties to deliver its requirements and recommendations.

Further to this, mapping within MEAS shows current flood defences, and where these need to be raised and improved. These areas can be shown within the Local Plan itself, and we would be happy to support on this. Where there is likely to be development and regeneration along the river and estuary, and within areas at risk of flooding, there will be a need to provide new and improved flood defence infrastructure.

The MEAS Strategy has not yet made decisions on the design of specific flood defence frontages, so there is an opportunity through the Local Plan and subsequent development to shape and deliver sustainable improvements in partnership.

Finished floor levels

As referenced within Medway's SFRA (Section 4.4.4), finished floor levels (FFLs) for all new development should be raised 300mm above the design flood level for living accommodation and 600mm above the design flood level for sleeping accommodation.

Policy CF13 (iii) of Medway's current local plan addresses the requirements for finished floor levels, stating that "development will not be permitted within a tidal flood risk area if it introduces residential living and sleeping accommodation below the estimated flood level"

We strongly recommend that this policy is updated to reflect the necessity to raise finished floor levels of living and sleeping accommodation 300mm and 600mm, respectively, above the modelled 0.5% annual exceedance probability (AEP) plus climate change flood level, except where it can be demonstrated that the modelled flood levels are sufficiently accurate at a given location to justify a reduced freeboard. This is a key mitigation measure to reduce the risk of internal inundation. Incorporating this within the new local plan's flood risk policy will ensure that all new developments are optimising their flood resistance and resilience efforts, subsequently increasing the protection of potential occupants.

Functional floodplain

Flood Zone 3b (FZ3b) is the functional floodplain. This zone comprises land where water from rivers or the sea must flow or be stored in times of a flood. Only 'essential infrastructure' is permitted in FZ3b (subject to the flood risk Exception Test) and 'water compatible' development, because of the expected high frequency of flooding and the particular importance of keeping these areas free from obstruction.

The definition of FZ3b within the national Planning Practice Guidance (PPG) (Table 1: Flood Zones) has recently been updated and states that it will normally comprise:

- land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or
- land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).

The current SFRA does not reference the national PPG definition of FZ3b. We recommend that you consider including this definition in your flood risk policy to allow for more accurate sequential test implementation when determining land use allocation.

Alternatively, if you plan to update your SFRA to align with the up-to-date definition of FZ3b, we recommend reference be made directly to the updated SFRA within the Policy.

Sustainable drainage

The effects of climate change, urbanisation and a growing population place an increasing pressure on our traditional drainage systems. Sustainable drainage systems (SuDs) mimic natural water flow and are designed to reduce the impact of rainfall on new developments by using features such as soakaways, permeable surfaces, grassed areas and wetlands. Subsequently, this reduces the pressure on our traditional infrastructure by reducing the overall amount of water that ends up in the sewers and storm overflow discharges. It also brings other benefits, such as boosting biodiversity, improving local amenities and harvesting valuable rainwater for reuse.

We encourage your new Local Plan to implement policy that expects development sites to follow a consistent approach to sustainable drainage. SuDs should be incorporated into new development wherever possible. We would request policies to require all development proposals to achieve greenfield runoff rates and ensure that surface water runoff is managed as close to the source as possible.

Furthermore, we advocate an expectation in your new Local Plan that SuDs are well designed and sensitively integrated into development, to support and enhance biodiversity through the creation of habitats such as ponds and wetlands, along with improving the quality of discharges.

Thames Estuary 2100 plan

The [Thames Estuary 2100 \(TE2100\) Plan](#) sets out how the Environment Agency and our partners can work together to manage tidal flood risk in the Thames Estuary, adapt to a changing climate and plan for the future of our riverside, today and into the next century. It aims to manage tidal flood risk through a series of upgrades to the flood defence system, including the Thames Barrier and other barriers, as well as the walls, gates, and embankments along the Estuary. As the Plan was designed to be adaptive, the timing and nature of these upgrades are dependent on climate change projections and the rate of sea level rise.

The Plan's requirements for Medway include future raising of all tidal flood defences, together with an ongoing programme of inspection, maintenance, repair and replacement of defences as required. Corridors of land alongside the existing defences should be safeguarded to provide space for these works. As the local planning authority, you have a responsibility to maintain and raise any defences you own, as well as ensuring that proposed works to third party defences align with the requirements of the TE2100 Plan.

The tidal flood defences in Gravesham consist of fixed defences on North Kent marshes from Higham in the west to St. Mary's Marshes in the east, and on the Isle of Grain from Allhallows on the Thames to Lower Stoke on the Medway. There is also a secondary defence for the industrial area in the east.

The future raising requirements of the flood defence levels in Medway are as follows:

- The primary defences on the Isle of Grain will need to be raised by up to 0.6m in 2040, and then by a further 0.7m in 2070. Further raising will be required in 2120.

This allows for projected increases in sea level to 2170 and beyond.

Riverside Strategy

There is currently no riverside strategy for this area. However please note that by 2030, local planning authorities should work with communities to develop visions for future riversides. These should show how riverside development can incorporate flood defence upgrades in line with the TE2100 Plan's riverside strategy approach.

The riverside strategy approach advocates early planning, so that developers, landowners and planning authorities can realise the potential to achieve significant public realm and environmental improvements when undertaking flood defence work. This involves:

- recognising that land may be needed to meet flood protection needs in the future and can enable delivery of associated social and environmental benefits
- setting out a vision of what you want the riverside to look like, so that when development or other construction takes place, the vision is used as a guide for how to shape and improve the riverside while raising defences or leaving room for future raising. This could be developed by any key stakeholder but needs to be clear about what is desired for the riverside

- making the vision a requirement in planning policy

The 2012 edition of the Thames Estuary 2100 Plan outlined that each council in the Plan area would produce its own standalone riverside strategy document. However, the update of the Plan published in 2023 recognises that there are other ways to adopt the riverside strategy approach. As part of creating [Outcome Delivery Plans](#), we will work with our partners to identify how they intend to embed the riverside strategy approach. This could be through developing a new standalone document, or via a combination of local plan policies, site allocations, supplementary planning documents, masterplans, planning performance agreements, marine plans, and green space strategies.

However, it is important that new documents or strategies complement and enhance existing ones. There is no need to duplicate work if there are already other strategies that can be input into or brought together to meet all of the targets simultaneously.

There is also an opportunity to develop your riverside strategy approach through the [Joint Thames Strategies Refresh](#) project. This project aims to update the existing Joint Thames Strategies, and the Thames Estuary Partnership will work with communities, councils, the Environment Agency and other partners to:

- update the Thames Strategy East upstream of Gravesend
- scope the need and potential extension of the Thames Strategy East or creation of an alternative Joint Thames Strategy downstream of Gravesend

Any agreed landscape visions for the river corridor will reflect how increasing tidal flood risk will affect the environment and include a riverside strategy approach to tidal flood defence upgrades.

The Joint Thames Strategies should be given statutory weight in Local Plans and other statutory planning documents. To find out more about the Joint Thames Strategies project, contact info@jtsrefresh.com.

In addition to this we have also produced the attached Sustainability Framework. We and our partners have identified 5 areas where we can make an impact:

- the climate emergency
- the nature emergency
- carbon management
- circular economy
- social outcomes

These themes follow sustainability legislation, partner plans and national and international policy and many of these are echoed in the document you have shared as part of the Climate Change Resilience and Adaptation Strategy.

We would be pleased to discuss the Sustainability Framework, Riverside Strategy Approach and the TE2100 plan in further detail with yourselves. It is our intention to work with partner organisations to ensure the TE2100 plan can realise the identified outcomes and deliver the benefits of the plan. We are at an early stage in

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communicating the Sustainability Framework with partner organisations and have already begun discussions with partner organisations who are implementing the Riverside Strategy Approach.

Waste management

We support your aim of ‘minimising the production of waste, enabling it to be managed as far up the Waste Hierarchy as possible’ in order to achieve a sustainable and green future in Medway.

To meet Medway’s strategic objectives, waste management must not be an afterthought. “homes ... supported by services” (Section 5.27) must include waste management services. As detailed within your spatial strategy (Section 5.12), nearly 30,000 homes are planned which could bring at least 120,000 people to the area. These people will produce significant quantities of waste. However, none will wish to live near a waste site no matter how well it is managed and, in particular, if it is not managed well, as this could reduce quality of life and weaken communities.

Chatham Docks and other brownfield sites are mentioned in the report for urban regeneration (Section 5.21 and 5.28). At Chatham Docks alone there are 3 large waste management facilities which have made significant investments in plant and infrastructure. The operators currently have nowhere else to carry out their activities. Without sufficient planning their closures will impact and burden other facilities in Kent or result in waste having to be transported out of area, putting increased burden on already overused roads. Further, there could be significant delays obtaining premises, relocating infrastructure, and obtaining new permits (which cannot be transferred from an address). It will also delay regeneration plans as waste operators on those sites will have to prepare site condition reports and apply to surrender waste permits.

The new Local Plan should include calculations on the additional waste produced by the new homes and businesses plus provide details of how and where this will be managed. Methods of reducing waste produced by new warehouse, distribution and other businesses plus householders should also be included to assist with preparing for a “sustainable and green future”. Sufficient land should be allocated to accommodate waste management facilities likely to be evicted from urban regeneration or brownfield sites or where current activities close to new developments are likely to impact new homes. This will help avoid fly tipping, illegal waste sites, easily predictable complaints, and problem waste stream issues.

Any new waste storage/transfer/treatment facilities (for example on the Isle of Grain near Hoo or Kingsnorth) will require an environmental permit and appropriate site infrastructure. Environmental permitting resources are stretched, and new applications can take up to 2 years or more to approve.

Any existing permitted waste facilities within Chatham Docks or other premises allocated for alternative land uses will need to prepare site condition reports and apply for permit surrender prior to any development taking place.

Groundwater and Contaminated Land

We support your strategic objective to 'Boost pride in Medway through quality and resilient development' recognises the need to 'deliver sustainable development ... directing growth to the most suitable locations'. Groundwater and contaminated land constraints should be a key consideration when deciding where new development should be located.

The Land Availability Assessment (LAA) identifies sites for consideration for potential development allocations. Map 1 illustrates potential sites for urban regeneration. It is recognised that many of the sites are subject to constraints including environmental considerations.

South of the River Medway and the Rochester/Strood area are underlain by Principal Aquifers with Source Protection Zones (SPZs) present making them sensitive in respect of controlled waters. Areas North of the River Medway are designated as Secondary Aquifers and Unproductive Strata (London Clay). However, it should be noted that the London clay is variable in thickness and underlain by Principal Aquifers. These designations are important for strategic potable water supplies and local utilisation, including interaction with watercourses and surface waters.

There are also a number of authorised and historic landfill sites present within the Medway Local Authority boundary.

We welcome Medway's regeneration strategy and making the best use of under-utilised brownfield land, outlined in section 5.19 and section 5.20 which notes that some sites are more sensitive in their environmental setting. It is stated that some sites offer the potential for taller buildings. We advise that during the allocation process that any taller buildings which may require deeper piled foundations are located away from land affected by contamination and former landfilling activities, or with confident mitigations that such foundation techniques would not present a resultant unacceptable risk to groundwater. We would be able to provide further advice on a site-specific basis.

Piling can result in risks to groundwater quality by mobilising contamination when boring through different bedrock layers and creating preferential pathways. Thus, it should be demonstrated that any proposed piling will not result in contamination of groundwater.

Section 5.26 states sites considered in this development involve the redevelopment of brownfield sites, sometimes with demolition, conversion or land decontamination required. Development of such sites tends to have higher costs for these reasons, and this can affect viability, meaning that the sites are not attractive to the market, or lower quality schemes are built. The Council is testing the viability of sites through its work on the Local Plan and should consider how policy can encourage redevelopment in these areas. The Council should seek to engage with the development sector to encourage them to consider promoting their sites.

We advise that any developments proposed on land affected by, or having past uses which may have been contaminative, will require the submission of preliminary risk assessments (PRAs) in support of planning applications, to ensure that the requirements set out in the National Planning Policy Framework (NPPF) (Paragraph

174) can be met. The development sector should be advised that consultation with the Environment Agency should be sought at the earliest opportunity to understand the expectations and level of detail which would be required in order to progress the site to development.

Drainage strategies and infrastructure will be of particular importance as while sustainable urban drainage is to be promoted, it is important that any infiltration drainage is demonstrated to be appropriate to the underlying ground conditions.

There should be no discharge into land impacted by contamination or land previously identified as being contaminated, no discharge to made ground, and no direct discharge to groundwater, a controlled water.

Water resources

Water resources are vital to sustainable economic growth and housing development as well as supporting the natural environment. Your Local Plan can help to ensure that water resources are protected and, where evidence justifies, that water efficiency measures are adopted as part of regeneration and development.

With respect to the growth depicted in Figure 1., we recommend that greater attention is paid toward the issue of water demand within your new Local Plan. It will be important that Medway work with the water companies (Southern Water and South East Water) and the Environment Agency to ensure that water is available to supply the additional residents and households that the plan anticipates.

Water quality

We would like to see the Local Plan place more importance on improving water quality through the protection and enhancement of the environment, as well as the promotion and enhancement of multifunctional benefits through local policies and practices aligned with the objectives of the River Basin Management Plan.

To contribute to your objective of “effective management of natural resources, including water” deterioration of water quality should be prevented from all possible sources. We encourage the use of water companies’ Drainage and Wastewater Management Plan (DWMP) to avoid developing areas where there are known drainage problems.

Medway Council is encouraged to establish a collaborative partnership with the water companies to ensure that new developments don't lead to overloading surface water drainage and sewerage infrastructure, this will avoid unwanted and uncontrolled pollution of water bodies. It aligns with the goal of ultimately working toward improving the Water Framework Directive (WFD) status of water bodies.

We urge that you proactively collaborate with water companies to develop strategies for accommodating future growth and mitigating climate change impacts related to wastewater infrastructure, water resources, and water efficiency, following water companies’ DWMP.

For example, the discharge of untreated or partially treated storm sewage through storm overflows reduces the water quality of water bodies. It is therefore important

that sewerage infrastructure is able to cope with growth or potential exceeding rainfall or flooding in the area. Reducing the frequency of sewage storm overflows is currently a priority to ensure that growth in the area does not lead to an increase in frequency and/or volume of storm overflows. You will need to work closely with the relevant sewage providers to ensure that growth forecasts are accurate, which are required when planning upgrades to treatment works and the sewerage infrastructure network.

Cross-boundary cooperation and planning on aspects of water resources, water quality and planning, will help maximise environmental benefits. The Local Plan should identify opportunities for cross-boundary cooperation and where existing cooperation can be improved.

Biodiversity

The importance of ecological networks of linked habitat corridors (both within the Medway Council area and linking to adjacent boroughs and parishes) to allow the movement of species between suitable habitats, and to promote the expansion of biodiversity is defined in the [NPPF](#) and the Local Nature Recovery Strategy (LNRS) commitment of the government's [25 year Environment Plan](#) (25YEP) and enacted by the Environment Act 2021.

We support your objective “To secure a robust green and blue infrastructure network across land and water that protects and enhances the assets of the natural and historic environments in urban and rural Medway; providing resilience for nature through better connectivity and conditions; informing the design and sustainability of new development; and supporting healthier lifestyles.” The connectivity of Local Wildlife Sites and other designated sites should not be disrupted through the allocation of sites for development and should aim to promote further connectivity of the ecological blue and green network through habitat creation and improvement. A numerical commitment to biodiversity net gain is required in order to be in line with the Environment Act 2021 and should be realised equally in both terrestrial and aquatic habitats using the Natural England Biodiversity and Rivers Metrics.

Given the high levels of growth proposed across Medway as depicted in your spatial strategy, we recommend the new Local Plan sets ambitious policies to deliver improvements to biodiversity. A minimum biodiversity net gain of 10% is required although we would strongly urge local authorities to consider 20% minimum gain.

Allocated sites should not encroach on any watercourse and/or coastal habitats and we urge a minimum 10m buffer zone to development proposals that contain or are adjacent to watercourses. Coastal areas will require a larger buffer zone.

Where there is an opportunity for river restoration enhancements, re-meandering, improved fish or eel passage or the restoration of culverted watercourses to open channels, we would like to see a commitment to actively pursue these aims.

We recommend that particular reference is made to culverted sections of watercourse. If and where the watercourse is toe-boarded, site allocations should consider opportunities for removal.

In accordance with paragraph 185 of the [NPPF](#) (2021), which states that planning policies and decisions should “limit the impact of light pollution from artificial light on ... dark landscapes and nature conservation.” We would urge appropriate lighting design in line with best practice guidance set out by the Bat Conservation Trust and Industry of Lighting Professionals guidance note ‘[Bats and artificial lighting in the UK](#)’.

As previously mentioned, policies should promote, and allocations should take into consideration, the use of SuDs and NFM measures for flow attenuation, filtration and water conservation.

We welcome engagement at the earliest opportunity to identify opportunities through development proposals for securing measurable gains for biodiversity.

Environment Agency planning advice service

As allocated or windfall sites with relevant environmental constraints or opportunities progress towards development, we would encourage applicants to engage with our planning advice service as early as possible.

We can provide detailed guidance on and/or review technical information for development proposals, prior to submission of planning applications, as part of our cost recoverable planning advice service.

Engagement with us prior to formal submission can provide applicants with greater certainty regarding our position and can speed up our formal response to planning applications. It should also result in better quality and more environmentally sensitive development.

We look forward to continuing to work in partnership with Medway Council to ensure development protects and enhances the environment.

We hope that you find our comments useful, and we would be pleased to meet with you to discuss in more detail any issues or queries you may have. Should you have any further questions, please do not hesitate to contact us.

Yours sincerely,

Kimberley Wadsworth

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Our ref: KT/2006/000047/SE-10/SP1-L01

Your ref:

Date: 09 November 2023

Dear Catherine,

Medway Local Plan Sustainability Appraisal - Scoping Report

Thank you for consulting us on the Sustainability Appraisal (SA) Scoping Report of the Medway Local Plan.

We consider that the key environmental issues within our remit are generally well covered within the SA including flood risk, climate change, waste management, groundwater and contaminated land, water resources, water quality and biodiversity.

We have some more detailed comments on certain aspects of the Scoping Report, in particular groundwater and contaminated land, water resources, water quality and the Thames Estuary 2100 Plan (TE2100 Plan), which we provide under headings below for ease of reference.

Groundwater and Contaminated Land

We support the detailed inclusion of Source Protection Zones in the Water Quality Section of Chapter 10. However, we feel that Groundwater Protection: Principles and Practice (GP3) and Guiding Principles for Land Contamination (GPLC) should be included in the Appendix table A9. The GP3 document is a key Environment Agency (EA) reference for Local Planning Authorities, developers and landowners. It is an important accompaniment to the River Basin Management Plan (RBMP) as it explains the relevance of Source Protection Zones (SPZs) and how these contribute to achieving good status under the Water Framework Directive.

Groundwater Protection: Principles and Practice (GP3) sets out our approach to groundwater protection and management and what we want others to do. It covers our high-level approach, the technical background to our work and an introduction to the tools we use. It also describes the legal framework we work within and the approaches and positions we take to regulate and influence certain activities and issues. The SPZs are also useful in identifying potential constraints for major projects such as the planned transport improvements. It can be found at the

following link: Groundwater protection: principles and practice GP3 - Publications - GOV.UK [Groundwater protection - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice)

Guiding Principles for Land Contamination documents were developed initially for landowners, developers, advisors and practitioners involved in redevelopment and evaluation of land contamination. These documents refer to relevant UK guidance and highlight specific steps and considerations involved in evaluating risks associated with land and water contamination and can be found here: <https://www.gov.uk/government/publications/managing-and-reducing-land-contamination>

Section 10.2.24 could include specific reference to groundwater protection for example: *'Local plans can help to ensure that groundwater is protected and where necessary improved during regeneration and development. Contamination in or on land can present unacceptable risks to human health and the wider environment, including to groundwater.'*

Groundwater is constantly moving and once contaminated it can take a very long time to recover if at all. Therefore, the overarching approach to groundwater protection needs to be considered at the strategic planning stage. Local Plans should identify sensitive groundwater areas along with policies for alternative approaches, such as cross boundary discussions with neighbouring LPAs, Environment Agency (where source protection zones straddle boundaries) and Water Companies

As the Environment Agency, the outcomes we want to see are:

- Groundwater is protected and improved for the benefit of people and the economy.
- Future developments are in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised.
- Local plan policies and strategies help to ensure that developing land affected by contamination won't create unacceptable risks or allow existing ones to continue.
- Therefore, we request that table 12.1 be more specific in mentioning Groundwater in relation to water quality.

Water resources

In paragraph 10.1.2 we suggest the following amendment:

Water supply and use is guided by Environment Agency's Abstraction Licensing Strategies (ALS), within the Catchment Abstraction Management Strategy (CAMS) process. [Abstraction licensing strategies \(CAMS process\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/abstraction-licensing-strategies-cams-process)

In paragraph 10.2.10 a standard of 125 litres per person per day is referenced however a higher standard of 110 l/p/d standard of 110 l/p/d is recommended by the Environment Agency in the National Framework for Water Resources and by DEFRA in the 2021 statement Reducing Demand for Water. [Meeting our future water needs: a national framework for water resources – accessible summary - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/meeting-our-future-water-needs-a-national-framework-for-water-resources-accessible-summary)

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In paragraph 10.2.12 we request the following addition: Medway Local Planning Authority is mostly supplied by Southern Water, and also South East Water near Halling towards the southwest. The draft Water Resources Management Plans for Southern Water and South East Water aim to manage and meet future demand through encouraging water use efficiency, for example by innovative techniques like integration of artificial intelligence for installing water meters and reducing leakage. <https://www.southernwater.co.uk/our-story/water-resources-management-plan/our-draft-water-resources-management-plan>
<https://www.southeastwater.co.uk/about/our-plans/future-water/>

In paragraphs 10.2.14, 10.2.15 and 10.2.16 we have the following comments and would be happy to discuss further if you had any queries regarding these comments:

- Abstraction Licensing Strategies (ALS) are strategies developed and updated by the Environment Agency for managing water resources at the local level. ALS have been produced for every river catchment area in England Wales and are due to be updated by 2027. The Local Plan Area is located within the 'Medway' catchment area. Medway abstraction licensing strategy - GOV.UK (www.gov.uk)
- There is water available for licensing to the north of the Medway catchment area and restricted water available for most of the Medway catchment area.
- The percentage reliability of new consumptive abstraction in the Medway ALS is available less than 30% of the time.

In Paragraph 11.1.3 Table 11.1: Soil and Water Resources, we suggest the following amendment: Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and water companies through the Thames and south east RBMPs, WRMPs and ALS.

In Table A9, page A38 we suggest the reference for draft Water Resource Management Plans for both Southern Water and South East Water. In addition, on page A39, Drought Plans should reference both Southern Water and South East Water.

[Drought plan | South East Water](#)

On page A40, Medway Abstraction Licensing Strategy should be updated as Medway LPA is covered by the Medway catchment area.

Water Quality

In paragraph 4.3.1, the bullet point on Water Quality should be amended to include the deterioration of water quality being prevented from any possible sources. Please also refer to water companies' Drainage and Wastewater Management Plan (DWMP) for sustainable development to avoid areas for development where there are known drainage problems.

In paragraph 10.2.20, the Local authority should proactively collaborate with water companies to develop strategies for accommodating future growth and mitigating climate change impacts related to wastewater infrastructure, water resources, and

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water efficiency, following water companies' Drainage and Wastewater Management Plan (DWMP).

Thames Estuary 2100 Plan

We recommend the inclusion of the [Thames Estuary 2100 \(TE2100\) Plan](#) which sets out how the Environment Agency and our partners can work together to manage tidal flood risk in the Thames Estuary, adapt to a changing climate and plan for the future of our riverside, today and into the next century. It aims to manage tidal flood risk through a series of upgrades to the flood defence system, including the Thames Barrier and other barriers, as well as the walls, gates, and embankments along the Estuary. As the Plan was designed to be adaptive, the timing and nature of these upgrades are dependent on climate change projections and the rate of sea level rise.

The Plan's requirements for Medway include future raising of all tidal flood defences, together with an ongoing programme of inspection, maintenance, repair and replacement of defences as required. Corridors of land alongside the existing defences should be safeguarded to provide space for these works. As the local planning authority, you have a responsibility to maintain and raise any defences you own, as well as ensuring that proposed works to third party defences align with the requirements of the TE2100 Plan.

The tidal flood defences in Gravesham consist of fixed defences on North Kent marshes from Higham in the west to St. Mary's Marshes in the east, and on the Isle of Grain from Allhallows on the Thames to Lower Stoke on the Medway. There is also a secondary defence for the industrial area in the east.

The future raising requirements of the flood defence levels in Medway are as follows:

- The primary defences on the Isle of Grain will need to be raised by up to 0.6m in 2040, and then by a further 0.7m in 2070. Further raising will be required in 2120.

This allows for projected increases in sea level to 2170 and beyond.

We hope you find our comments helpful. Should you have any further questions, please do not hesitate to contact us.

Yours sincerely,

Kimberley Wadsworth

Planning Advisor

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COMMENTS on **Future Medway** from Alison Gray, [REDACTED]

3.1 An exemplary vision.

However, without central government financial support for vital major infrastructure, or alternatively towns sponsored by affluent companies/benefactors, it may leave unsupported development.

People need a change of mindset to lead a more sustainable lifestyle. Cycle routes are fantastic but need to be Netherlands style. Culture for new settlements is vital.

Quality businesses (not coffee shops/wine bars or tourist-aimed goods) are important.

Retro-fitting older properties in towns requires improvement grants as in 1970s. High Streets need an element of compulsion in forcing owners of empty shops to provide imaginative accommodation for mixed ages. No building should be empty.

4.2a Construction of high-rise blocks will never be carbon neutral. We need as far as possible to adapt what already exists.

We need to ensure that not all our natural environment is completely managed.

Changing people's lifestyles is the principal answer to carbon impacts and medical waiting lists, but a gargantuan target.

The effective management of water and waste is not achievable while water authorities pay out dividends.

The government should not require Medway to build on land at risk from rising sea levels. Impossible to gauge necessary height of defences when this depends upon others' steps to address Climate Change.

4.2b Healthy lives/strengthening communities

An excellent housing aim, but how?

Energy efficient, damp-free homes are essential, but costly. The expense of upgrading our solid brick house, improved with a council grant in 1975, is now astronomical, but needed.

Reducing inequalities in health is becoming increasingly difficult as more people, with some money, pay for health care. Changing people's lifestyles is a battle against people's concept that they will not be 'nannied', however obvious the need is with Medway's obesity statistics.

Villages are struggling to keep the shops and services they already have. Shops' products need to be wanted.

4.2c Securing jobs/developing skills

Whilst investment and local businesses are essential, their expansion needs to be balanced carefully to ensure Medway does not lose the built heritage and landscape assets, that are valuable from a national viewpoint, local viewpoint, and environmental viewpoint. Talk of green tourism brings concerns that those few areas of quietness and tranquillity left within Medway will resound to the hubbub of visitors.

Green industries at the Grain and Kingsnorth sites would be welcome if infrastructure were in place.

Rather than improving graduate retention, attract graduates in from elsewhere. Moving to another area is part of the post-university ladder-climbing process.

4.2d Medway needs to have pride; it needs to succeed. These are all excellent targets. But, the infrastructure is overridingly important. In the UK we also have yet to solve reducing car dependency. People will see restriction as taking away their liberty; they do not relate their immediate actions to weather catastrophes and rising sea levels.

Medway is at a point where everybody needs to work to make the area succeed, and everybody needs to contribute, irrelevant of party politics. More holdups in the Local Plan will leave more treasured spaces open to ill-placed or uncontrolled development.

5.2 Change is important: adaptability is the most important survival skill. More importantly, we also need huge skill in evaluating how we do this. Slow evolving tends to better success. This is a huge amount of change within a short period of time, an overwhelming task for Medway's valiant Planning Department.

5.3 This should rightly be criticised.

5.7 Junction 1 of the M2 already appears to have more than its share of consequential accidents. Irrelevant of housing, if the Grain and Kingsnorth sites are to function for employment, even with river access, they will require good road access from main routes.

Junction 2 is also of concern: Highways England has modelled that a holdup at the A228 junction with Bush Road quickly leads to tailbacks on the slip roads from the M2. Additional development will only exacerbate this danger.

5.9 Is Medway able to condition its provision of houses on the improvement of junctions by Highways England and the LTC? If LTC's modelling is now incorrect because of the government's change in modelling for Medway, surely it should be re-evaluated.

5.10 It is difficult to see what suitable mitigations there can be for the disturbance of wildfowl sites or the loss of nationally designated landscape areas 'through the delivery of new services.'

5.11 The area between Gravesend and Strood is the narrowest section of the entire Metropolitan Green Belt. It is therefore particularly susceptible to development pressures. If the government is not careful, by putting pressure on both Medway and Gravesham, its housing quota demands will negate the purposes of the Green Belt as a containment for London and will create the joining up of large areas of conurbation along the River Medway, rather than the joining up of areas of green to create environmental corridors.

5.15 Yes, this growth will indeed create significant impact.

5.18 I fully support this and the following paragraphs on regeneration. However, one needs to be aware that in previous years councils have been known to mistakenly destroy buildings of historic significance.

5.20 The use of appropriate approaches to different areas is welcome. Care for individual areas makes each special and a valued contributor to the whole.

5.25 Please see comments at 4.2 about rising sea levels.

5.26 From a long-term environmental viewpoint, contaminated land should be dealt with rather than ignored. Obviously, cleaning to a standard required for domestic housing with gardens is greater than

that considered safe as a standard for industrial units. We need to ensure that the human population doesn't continue to contaminate more and more land. Again, this would be an ideal target for government grants, particularly since other areas of the country have often benefited from products creating the contamination.

5.29 The green lungs of Medway are such an important benefit to the heavily built-up areas spanning the hills around. It is so sad to see these starting to disappear under development. Unbelievably, people have so rapidly forgotten how necessary it was to have green space during lockdown – the joys of getting out into countryside. These are areas without easy train stations. It would not be possible to correct this. These sites would make an easy profit for the developer, but we are looking at sustainability and pleasant living, not queuing incessantly to get out onto a road.

5.35 It is important that, as a less rich authority, Medway does not end up footing the infrastructure bill for cross-boundary developments promoted by Maidstone (or other authorities). It is equally important that urban sprawl is contained and does not spread out to join up across the Southeast.

5.36 The Hoo Peninsular contains the brownfield sites of Grain and Kingsnorth – suited to further industrial development, but only with new infrastructure. At present, the nationally important marshes are part of Medway's contribution to keeping some balance within climate change and to counterbalance the mess of gravel extraction. This area, beside the lower parts of Strood, is most prone to flooding caused by rising sea levels. The likelihood of sea defences failing will increase. Defences need to be sufficient for the lifetime of any development (100 years for residential development). Expense will be involved.

5.38 There are already substantial queues at peak times to get on and off the Hoo Peninsular. Again, this is an area with no train service. From a green viewpoint, trains become more and more important in the bid to alter car-dependency.

5.42 Green tourism can only form a limited part of any economic strategy, in that numbers of visitors to view birds will need to be limited so as not to disturb what they have come to see. And yes, the wheeling of starlings in the sky is spectacular.

5.45 Agreed.

5.46 Agreed.

5.49 Although Medway found in their review of Green Belt land in Medway that the purposes of Green Belt policy are being met, Gravesham's similar review identified the area of Green Belt between Gravesend and Strood as particularly vulnerable to development. The Green Belt requires cross-boundary consideration, particularly at this, the narrowest part of the entire Metropolitan Green Belt. Presumably Gravesham's potential development allocation to the west of Medway near Strood, will rely upon Medway's infrastructure and introduce more traffic using unsuitable road junctions. Would Gravesham contribute money towards road improvements?

5.51 The fact that the Lower Thames Crossing will involve significant change between Strood and Gravesend is all the more reason for strengthening and maintaining those areas of Green Belt here. Additional housing will further weaken the Green Belt status, which is particularly fragile. It is important that the A2, High Speed Rail Link and LTC do not form a corridor for development that will join Gravesend to Strood.

5.53 Green Belt and AONB status both cover the area of land refused planning permission for a winery at an Appeal (March/April 2023).

The Inspector's concluding comments on the site would all apply to housing: the viewpoint from Brockles, one of the finest in the AONB; an urban feature in a secluded valley; a new road close to an existing route – two metalled roads urbanising the area. It would extend the village of Cuxton not in compact infill form but a ribbon leading away from the existing village into a peaceful valley crossed by the North Downs Way.

5.55 Mention was made elsewhere of the encouragement of Start-ups to boost the local economy. 2023 has just been announced as the worst year for business companies' insolvency since 2009, which does not bode well.

From: [REDACTED]
Sent: Tuesday, October 31, 2023 2:31 PM
To: smith, catherine [REDACTED]
Cc: velayutham, prem [REDACTED]
Subject: Medway Local Plan Regulation 18 consultation

Dear Catherine,

Thank you for the opportunity to comment on the Medway Local Plan Regulation 18 consultation. We congratulate you on the quality of the consultation document that is impressively succinct and provides the information and proposals that are needed to demonstrate a clear and specific vision for the area and overall direction of travel for the local plan.

Given the high level nature of the consultation document, our comments are similarly high-level. We already have a good track record of meeting under the 'Duty to Cooperate' responsibility and look forward to continuing to work collaboratively on cross-boundary issues. We have already shared data to support the production of local plan evidence and are currently joint working on emerging evidence where appropriate.

A key priority for Swale Council relates to air quality issues along the A2 corridor. Given the pressure for development at Newington and Rainham, we would like to continue to work collaboratively with you, with a continued focus on addressing these issues. Our own Air Quality Action Plan includes an action to create a transboundary agreement with Medway Council and subsequent mechanism to deal with the cumulative impacts of development in the area on air quality. Our early thoughts are that the emerging local plans could include a policy hook for a joint approach and scheme of mitigating the impacts of development on air quality in this specific area but we will of course continue to discuss this at our DtC meetings.

Kind regards,

[Redacted]

Swale Borough Council

Swale House, East Street, Sittingbourne, ME10 3HT [Redacted]

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**Growth, Environment
& Transport**

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

BY EMAIL ONLY



31 October 2023

Dear Sir / Madam

Re: Medway Council Local Plan 2022-2040 – Setting the direction for Medway 2040 – Regulation 18 consultation

Thank you for inviting Kent County Council (herby referred to as the 'County Council') to comment on the Medway Council Local Plan – Setting the direction for Medway 2040.

The County Council welcomes the commitment to prepare a new Local Plan. The County Council seeks to work in partnership with Medway Council to ensure the delivery of well designed, sustainable growth – supported by the necessary infrastructure that is planned for and delivered in a timely manner.

The County Council is supportive of the Strategic Objectives identified which focuses on the delivery of sustainable, resilient and healthy communities and economy in Medway.

It is recognised that this is an early-stage consultation and Medway Council is currently progressing an evidence base to inform the Local Plan. The County Council would welcome continued discussions on any cross boundary and strategic matters as the evidence base is developed.

The County Council recognises the significant housing requirement for Medway, and the ongoing consideration of whether there is capacity to provide an additional 2,000 homes to help to meet Gravesham's housing need.

The County Council notes that four broad categories of locations where development could take place have been identified within this consultation document. The County Council would urge that for categories that are likely to have cross boundary impacts, engagement takes place at this early stage to address these impacts and ensure adequate mitigation and infrastructure can be secured to ensure that growth in these locations is sustainable.

Identified growth forecast in Medway will have an impact on key services provided in Kent, especially in areas close to neighbouring boundaries. The County Council will continue to work with Medway Council to ensure that, as growth options are developed, a clear strategy to deliver the necessary infrastructure is in place to ensure that development is sustainable.

The County Council recognises the need for Medway Council to consider the potential impacts of the proposed Lower Thames Crossing. The County Council would encourage Medway Council to engage in the ongoing Examination of this Nationally Significant Infrastructure Project.

The County Council has reviewed the consultation document and sets out its comments below.

Highways and Transportation

The County Council, as Local Highway Authority for Kent, notes that this consultation document provides a useful summary of the issues and challenges facing Medway in developing a Local Plan.

In respect of transport, the Local Highway Authority for Kent, supports the aim to reduce car dependency to create safe, connected and sustainable places. It also understands the need to encourage economic development to enable people to live and work in Medway, as well as the need to secure investment in transport and green infrastructure.

The Vision for 2040, as set out in Section 3, is clearly defined and the ongoing work whereby all potential development sites are being assessed for their ability to deliver sustainable development, will contribute to the necessary evidence-based plan making process. Given the constraints in the transport network surrounding Medway, and the opportunities offered to create sustainable developments building on the existing network of footways, cycleways and public transport services - the County Council, as Local Highway Authority for Kent, considers an urban regeneration focused development strategy could offer the best opportunity to meet the vision. The County Council appreciates the Local Plan will also likely need to contain a mix of other sites in suburban and rural areas. The County Council looks forward to further close working with Medway Council as the plan is progressed, including scenario testing and identification of potential impacts and mitigations utilising the Kent Transport Model. Particularly in areas along the A2 corridor, along which further growth is proposed.

In this respect, the County Council as Local Highway Authority for Kent, wishes to highlight the importance of the existing strategic transport corridors connecting into Medway within the Kent boundary that experience congestion and air quality issues. There is particular interest where the proposed development areas are likely to materially impact on the transport corridors and the operation of the associated local highway network.

Public Rights of Way

The County Council, in respect of Public Rights of Way (PRoW), has a statutory duty to protect and improve PRoW in the County and is therefore committed to working in partnership with Medway Council to achieve the aims contained within the County Council Rights of Way Improvement Plan and the Medway Rights of Way Improvement Plan. The partnership aims to provide a high-quality PRoW network, which will support the Kent and Medway economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent and Medway a great place to live, work and visit.

In respect of the Vision for Medway in 2040, the reference to *“improved travel choices”* is welcomed and the County Council would take the opportunity to suggest links to the Kent networks should be included. There is an increasing need for Active Travel cross-border routes due to development both in Medway and neighbouring Kent districts/boroughs.

The County Council would welcome partnership working and investment in cross border routes. This applies to routes which have the potential to bring economic and tourism benefits to the area such as the new National Trail, the King Charles III Coast Path, promoted routes and green spaces.

Education

The County Council, as Local Education Authority for Kent, has considered the location of the proposed new development areas in relation to their proximity and potential impact on existing state-maintained schools that might be affected. Four districts/boroughs share an administrative boundary with Medway: Gravesham, Tonbridge and Malling, Maidstone and Swale.

The County Council recognises that Medway Council intends to provide new schools for any new development. The County Council supports this and would request that each development provides the necessary funding and infrastructure to mitigate the impact of growth. For all four Kent districts/boroughs which border Medway, there are County Council schools that are close to the border and it is understood that there will be students that cross the border to attend these schools. Similarly, there will be Kent children who travel into Medway to attend a school. However, it is important to note that the Kent schools near the borders are virtually full and will not have capacity to accommodate any new children generated from new Medway development. Therefore, if any of these schools need to pick up the additional growth

proposed, the County Council would ask that discussions take place to ensure that the growth can be properly accommodated, with the appropriate level of funding.

It should be recognised that the four mentioned districts/boroughs which border Medway are currently progressing new Local Plans. The County Council will be analysing the housing that is proposed through these local plans and will likely need to consider additional new provision. The County Council would therefore welcome continued engagement with Medway Council to ensure adequate level of provision of this infrastructure to support communities in Kent and Medway.

Minerals and Waste

The County Council, as Minerals and Waste Planning Authority for Kent, notes that Medway has a significant waste management capacity, mineral importation and transportation infrastructure. These should be subject to safeguarding to maintain their viability and effectiveness. It appears that the waste management capacity at the industrial Chatham Docks site is possibly at risk of being lost if this area is allocated for non-waste development. This should be given due consideration and the County Council would ask that the net waste management self-sufficiency could be included within the vision for Medway. If capacity is lost, this should be proximately replaced to ensure growth is sustainable in Medway.

Sustainable Urban Drainage Systems

The County Council, as Lead Local Flood Authority for Kent, supports Medway Council's aspiration to reduce the risk of flooding through preparations of a sustainable and green future by securing a robust green and blue infrastructure network. The County Council would recommend that the Local Plan should be robust in its requirements with regards to defining acceptable operational characteristics of surface water systems and would draw reference to paragraphs 159-169 of the National Planning Policy Framework regarding planning and flood risk.

Heritage Conservation

Medway's historic environment has played a significant role in forming the character of the unitary authority today, as well as having potential as a contributor to the success of the area in the future. Medway has a wide range of heritage assets, many of which are of international importance. These include 76 scheduled monuments, almost 650 Listed Buildings and 3 Registered Parks and Gardens. There are many more heritage assets that contribute to character at a local level. These include more than 30 historic parks and gardens as well as historic landscape features, historic buildings and archaeological sites. Indeed, the Kent Historic Environment Record lists more than 4,600 non-designated heritage sites in Medway. These assets are to be found across the unitary authority. Highlights include Rochester with its important Roman, Saxon and Medieval remains, Chatham, with its internationally important Royal Dockyard and associated fortifications, Gillingham which has Saxon origins and the Thames Estuary fortifications located on the Hoo peninsula and Isle of Grain. Within the rural areas of Medway, the historic environment is similarly important:

important Palaeolithic remains are present at Cuxton and elsewhere along the former courses of the river Medway, and the marshes and intertidal zone are important for later prehistoric remains. The rural areas are particularly important for military and industrial survivals as well as the pattern of historic villages and lanes. Many of these sites are of national significance but currently not designated. For new growth and development to successfully integrate with the historic environment of the area, it will need to work with the grain of this existing character and, if possible, enhance it.

The County Council considers that the need to regenerate and develop Medway in a way that is sympathetic to its past should be a consideration through the Local Plan process. At present, Rochester is a visibly historic city with many high-quality buildings and an attractive streetscape. Chatham has the areas, primarily associated with the river frontage, - the Dockyard and historic fortifications which are similarly attractive. . In Gillingham, by contrast, historic features are less common and less visible, yet Gillingham is a historic settlement dating to perhaps Anglo-Saxon times. The river frontage contains numerous heritage assets and has great potential for heritage-led leisure and tourism. The County Council recommends that the Local Plan should seek to ensure that the heritage assets of all of Medway are used to their maximum advantage so that regeneration can be successful and durable.

The County Council would also recommend that it would be helpful if the Local Plan could identify ways in which the heritage of the area could actively contribute to life in Medway. On the Hoo Peninsula alone, Cockham Wood Fort, Grain and Slough Forts, the Second World War Stop Line and the coastal and maritime heritage all have the potential to become foci of community activity in the form of heritage walks and community projects.

The County Council would draw attention to a number of key studies and resources that could inform consideration and use of Medway's historic environment:

- [Kent Historic Environment Record](#), a database of archaeological sites, historic buildings and landscape features in Kent and Medway.
- The outputs of the [Hoo Peninsula Historic Landscape Project](#) – a major project carried out by Historic England from 2009 – 2012 that examined all aspects of the peninsula's heritage.
- [Historic town survey reports for Chatham, Rochester and Gillingham \(2004\)](#). These reviewed the known archaeological and built heritage of the three towns and identified Urban Archaeological Zones of sensitivity.
- [Kent Farmsteads Guidance \(2012\)](#) for developers and planners considering development in the countryside.
- [Kent Historic Landscape Characterisation \(2001\)](#).
- [Kent Gardens Trust survey reports](#) for gardens and green spaces in Medway.

It is important that appropriate policies for the protection and enhancement of Medway's heritage are included in the Local Plan. The County Council would encourage consideration of the full range of heritage types including:

- Archaeology, including non-designated heritage assets
- Built heritage, including non-listed buildings, listed Buildings and Conservation Areas
- Historic landscapes, including historic parks and open spaces
- Local Heritage Assets, perhaps including a commitment to the development of a Local List.

The County Council, in respect of heritage conservation matters, has provided detailed comments on the consultation document in Appendix 1.

Biodiversity

The County Council draws attention to the need to consider Biodiversity Net Gain and the emerging Local Nature Recovery Strategy. There is a need to ensure that allocated sites will not result in the loss / impact on habitat connectivity. The County Council would also recommend that the Local Plan should be looking to protect areas which are important for species/habitat connectivity.

The County Council would also draw attention to the need to ensure that sufficient ecological information is available to ensure the impact of development can be fully understood and considered accordingly.

Whilst the consultation does not have a specific section which relates to the Environment, the County Council does note the objective within the Plan to prepare for a sustainable and green future. The County Council would recommend that as well as consideration of climate change, sustainable transport, robust green and blue infrastructure and the effective management of natural resources, there should be a stronger consideration of environmental goals. The Local Plan should include a detailed consideration of the environment, encompassing the natural and built environment, including heritage.

Wharves

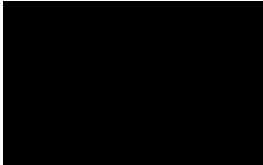
The County Council also notes that development is proposed along the Chatham Docks and Rochester Riverside in Medway. The County Council is concerned that the closure of some of the deep-water wharfs could lead to increase pressure on the current working docks in Kent, for example Riddock Dock and Sheerness. The County Council would ask that protection for these facilities is considered to limit the pressure on other ports in the area.

The County Council recognises the importance of the Local Plan in developing a growth strategy that responds to the strategic objectives and the vision for Medway. Joint working between the County Council and Medway Council, working in collaboration to understand and address cross boundary matters, should continue throughout the Local Plan process and delivery of good growth.

The County Council would therefore welcome continued engagement as the Local Plan progresses and will continue to work closely with Medway Council to support the delivery of new sustainable housing, employment and required infrastructure in response to local needs.

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

Yours faithfully

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Encs:

Appendix 1: Kent County Council Heritage Conservation detailed commentary.

Appendix 1: Kent County Council Heritage Conservation detailed commentary.

3.1 Vision for Medway

The references to Medway's historic environment are rather inconsistent in the current text. When the Vision is eventually defined, it would be better to include a firm overall commitment to protecting and enhancing Medway's heritage to which additional mention can be made as needed in other sections. This will help ensure that preserving a high-quality historic environment is regarded as a key goal for the Vision for Medway in its own right, rather than just being an adjunct to other goals.

By 2040, Medway is responding and adapting to climate change, providing for more sustainable and resilient development.

Climate change will also provide a major challenge for the management of Medway's heritage. Many of Medway's heritage assets are coastal and are directly threatened by rising sea levels. Examples include the prehistoric, Roman and medieval salterns of the marshes of the Hoo Peninsula, Roman pottery-making sites visible in the foreshore and the fortifications of Grain, Cockham Wood Fort, Slough Fort, Hoo and Darnet Forts and the Historic Dockyard. Changing moisture levels in the soil will impact on archaeological remains which are susceptible to drying, wetting and erosion and historic buildings will be challenged by increased wind and storms. It would be helpful if Medway Council could include a survey of Medway's heritage in its action plans and the likely impact of climate change so that management can be identify both risk and any necessary actions.

The County Council agrees with the goal "*Medway has secured the best of its intrinsic heritage and landscapes alongside high quality development to strengthen the area's distinctive character... Important wildlife and heritage assets are protected and enhanced.*" Key to this will be ensuring that the Medway Heritage Strategy is fully integrated into relevant decision-making, design and master planning for development proposals as well as blue and green infrastructure projects.

4. Strategic Objectives

The County Council considers that it is unusual that there is no strategic objective that relates to Medway's environment. The environment is central to whether Medway is a good place to live in and visit, with clear consequences for health and wellbeing, economic dynamism and quality of design. The County Council recommend that a specific objective be included that includes securing Medway's high-quality environment for future generations, in all its forms including the historic environment.

Proposed objective: *Prepared for a sustainable and green future*

The historic environment has a significant role to play in the conservation of resources required for development, and in energy efficiency. Old buildings can often be more energy efficient than newer ones and of course have already been built.

Thus, it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic England has produced a range of guidance on the role that heritage can play in mitigating climate change and historic building adaptation ([Climate Change Adaptation Report](#) (Historic England, 2016)). The guidance demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change, and more energy efficient than more modern structures and settlements. This has also been updated in the Historic England report [There's no Place Like Old Homes: re-use and Recycle to Reduce Carbon](#) (Historic England 2019). This could be highlighted in the text which, at present rather suggests that the brunt of making housing energy efficient must only be borne by new buildings.

Using historic routeways also allows Green infrastructure (GI) designers to incorporate heritage assets to provide features of interest. In turn this will help people accessing the GI to become more aware of and value Medway's heritage which will in turn assist their conservation and re-use. For example, the Hoo area has links to internationally important fortifications at Grain. If the GI were to feature these it would help raise their profile to assist with conservation whilst diminishing the attractiveness of the sites for anti-social activity. GI can also be used to support tourism in Medway by linking historic sites and landscapes such as the Chatham Lines, Rochester Castle and Cathedral and the historic explosives works of the Hoo Peninsula.

To fully appreciate the Medway's landscape character and incorporate it into GI effectively, it is first important to understand it. The main method for investigation historic landscape character is by historic landscape characterisation. This is a method of assessing the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape. This has been completed for the [Hoo Peninsula](#) and the County Council would urge Medway Council to draw on the research to identify connectivity between the heritage assets of the area.

GI also makes an important contribution to health. Historic England has released research that demonstrates how heritage actively supports health and well-being through contributing to a generally more attractive environment, allowing activities that encourage participation and inclusion and by encouraging outdoors activities. [Wellbeing and the Historic Environment | Historic England](#)

5. Developing a Spatial Strategy

The County Council has submitted detailed appraisals of the strategic sites mentioned in Chapter 5 previously. All will need to be subject to fully detailed appraisal to inform development proposals and master planning. The potential for the main sites is, however, summarised below.

Urban Regeneration

Although brownfield sites may be attractive for development for various reasons, they can nonetheless contain significant heritage assets. Medway has an important industrial past with early examples of chalk pits, factories and infrastructure related to the cement and other industries. These contribute significantly to the area's historic character and can be used in master planning new developments to help new build be better integrated into the existing landscape. Similarly, many such sites, especially quarries, will contain deposits of archaeological significance. Medway is important for Palaeolithic archaeology (c. 800,000 BC to 10,000 BC) and sensitive deposits may well survive beneath the floors, and in the edges of quarries. Riverside brownfield sites may well contain archaeological remains associated with the former river frontage. To establish the archaeological potential of brownfield sites it will be necessary to carry out detailed assessments in the form of desk-based assessment and, if appropriate, fieldwork.

To ensure that new development on brownfield sites is fully integrated into the existing character of Medway's historic towns, it will also be important to ensure that Conservation Area appraisals are completed for all Conservation Areas. This should also be a recommendation in any action plan.

The Local Plan will also need to ensure that Medway's historic river frontages are conserved and enhanced during urban regeneration schemes. It is easy for historic features to be sacrificed during revetment refurbishments and the construction of new promenades etc, but it is these that give the frontages their character. Full, detailed assessment of river frontages will be needed to inform scheme designs.

Suburban Expansion

Grange

The development area lies in a region of considerable archaeological potential, primarily from the Roman period onwards. At Grange Manor prehistoric features and over 20 Roman structures were excavated including a temple or mausoleum, workshops and roads. Early medieval evidence was also found and Grange/Grench Manor includes the remains of a 13th century medieval manor house complex. Close to (or possibly within) the development area the remains of two 19th century infantry redoubts also survive. These experimental sites marked important stages in the development of defensive sites.

Lower Rainham

The development area has archaeological potential associated with its position close to the river Medway, where a number of past archaeological discoveries have been recorded. These include Romano-British pottery vessels found close to Lower Rainham Road, and probably originally deposited in association with a burial. Other finds from the area include a 5th century AD gold Merovingian coin and large numbers of flint tools including Palaeolithic hand-axes.

Rainham

The Rainham development area has been relatively little studied, and few heritage assets are known from within the area itself. Nevertheless, the general potential of this part of Medway is significant and includes important Roman remains to the north and at Hartlip. Roman Watling Street also passes through the development area. There are also a number of historic farmsteads and listed buildings.

Capstone

There has been little formal investigation of the development area. A number of Palaeolithic implements have been discovered in the Darland area. A Bronze Age barrow may have existed at Sharstead Farm. Romano-British burials have been reported from Hale Farm and Gransden's Brickfield, although there is little further information about these. Their locations suggest that a Roman routeway may have existed in this area. A possible pre-18th century chapel has been identified near Capstone. Fort Darland, built as part of the Chatham ring-fortress in 1899, is located to the north of the area. Although now demolished, earthworks associated with the fort remain and these and their setting could be affected by development in the area.

Wigmore

This small development area lies in an area of more limited archaeological potential. The remains of a medieval chapel are located immediately south of Hempstead Valley Shopping Centre. A Second World War decoy site for the Shorts aircraft factory was located west of Capstone Road and a heavy anti-aircraft battery was installed at Gibraltar Farm. Some camp structures remain.

Rural Development

Chattenden

Although the Chattenden village centre as indicated on the map in the document is some distance from the main Chattenden military site, there are nonetheless several heritage assets that could be affected by the proposals. On the Kitchener Road roundabout, part of one of the former 1961 guardhouses survives alongside the main access road into the barracks. At Copse Farm, three concrete Second World War (probably) barrack huts also survive. At the junction of Kitchener Road and Chattenden Lane the former Garrison Church still survives, albeit as a civilian church. All three of these sites are located in the area identified as the 'indicative neighbourhood centre'. In the event of major development in this area it will be important to ensure that those structures which are retained keep some of their context in terms of setting and interpretation, so the military origins of the area remain in the local memory and contribute to the character of the neighbourhood.

In the angle between Broad Street and the Ratcliffe Highway, aerial photographs have suggested former field systems of unknown date. Also running through this

area from the main Chattenden village site was a small-gauge railway from Chattenden to Hoo.

In the area south and west of the proposed village centre, there are numerous remains of the area's military past. These include a former 19th and 20th century Naval military railway that connected munitions and military depots around Hoo, a 1950's wireless transmitter Station at Beacon Hill, the remains of a Second World War Naval Signal Station, the scheduled Second World War blockhouse and beacon, a Cold War air-raid shelter, a Second World War pillbox and a First World War anti-aircraft battery. There are also areas of First or Second World War practice trenches on Beacon Hill. This complex of sites would suit being brought together in a trail or another form of interpretation to help maintain the green space between settlement areas and to retain memory of the military origins of the Chattenden area.

Finally, recent archaeological investigations at Chattenden, in response to housing development, have revealed important, but previously unknown, archaeological sites including evidence for Mesolithic activity and Anglo-Saxon settlement. These discoveries highlight the potential for further important, but unknown, archaeological sites to exist within the proposed growth area. Any future masterplan for the area would need to have sufficient flexibility to take account of important archaeological discoveries. This will likely require a comprehensive programme of desk-based, non-intrusive and intrusive assessment and evaluation prior to any detailed master planning.

Deangate Ridge

Deangate is located in a highly significant military landscape originally dating back to the late 19th century with the use of the area being a major magazine establishment. Although much of the site has been demolished, numerous magazines, protecting earthworks as well as later defences still survive. During the Second World War, the entire site was defended by an arm of the General Headquarters Stop Line that ran from Hoo St Werburgh to Higham Marshes. A 2014 survey by Historic England has mapped the route of the Stop Line and its accompanying pillboxes, earthworks and defences which essentially follow the route of Dux Court Road as far as Wyborne's Wood before turning west. Four of the pillboxes in this area of the GHQ Line have been designated as listed buildings and several features relating to the Lodge Hill Magazine. Between Hoo St Werburgh and the magazine also formerly stood the Deangate Second World War radar station, which included gun emplacements and ancillary structures.

West/East of Hoo St Werburgh

Previous archaeological investigations in the area have discovered extensive prehistoric and Romano-British remains in the vicinity of Hoo. The alignment of a Roman road linking the Hoo Peninsula to Roman Watling Street is projected to run to the south of the former Chattenden Barracks close to the development area. To the north-west of the area, within the Lodge Hill enclosure, a Romano-British cemetery has previously been identified and a further occupation site has been found south of

Hoo between the village and the shoreline. The village itself contains built heritage assets such as the church and it is important to protect the long views towards them. There are also Saxon and Medieval remains, although the site of the 7th century nunnery has yet to be identified. The landscape also contains numerous survivals of the Second World War associated with the GHQ Stop Line that runs from the foreshore south-east of Hoo to the north of Lodge Hill where it turns west.

West of Hoo St Werburgh. Finally, both east and west of Hoo there is a strong maritime character with many coastal features that also contribute to the historic character of the area.

The Cockham Farm area has an extensive heritage. From north to south:

Both north and south of Stoke Road, cropmark complexes and field boundaries have been observed in aerial photographs, although the dates of the complexes are unknown.

Along the route of the Saxon Shore Way a number of well-dated archaeological discoveries have been made. Palaeolithic artefacts have been recovered from a brickearth pit to the south-west of St Werburgh's Church in Hoo in the 1930s. A late bronze age occupation site was discovered during a watching brief in 1999. An iron age coin and torc were found close to Hoo village. A Romano-British cemetery and occupation site was found in 1894 near Cockham Cottages. The lost 7th century nunnery may exist either within the village or perhaps within the Cockham Farm area and other middle Saxon features are known from the area south of the village.

Along the coast can be seen numerous examples of more recent heritage assets. Although Roman remains have been found at Hoo Marina Park, most of the remains relate to the maritime use of the coastline. The most significant site is the scheduled 17th century Cockham Wood Fort built by Sir Bernard de Gomme as a response to the Dutch Raid. Despite its scheduled status, the fort is included in the national Heritage risk register where it is described as at risk of immediate further rapid deterioration or loss of fabric if no solution for its conservation and management is agreed. There are also numerous wharves, jetties and quays, as well as several examples of wrecked barges dating from the 18th to 20th centuries.

In addition to the maritime activity, there are several important 20th century military assets along the coast. The GHQ Stop Line meets the coast at this point and the junction was defended by at least 8 pillboxes and anti-landing sites.

East of Hoo St Werburgh

Prehistoric cropmarks, enclosures and features have been seen in aerial photography between Sharnal Street and Tunbridge Hill and also around Tile Barn Farm. A number of discoveries dating between prehistoric to Saxon times were made during the Isle of Grain gas pipeline works, including most notably, a Late Bronze Age settlement or probable possible funerary site and a possible Late Bronze Age

small scale industrial site. A Romano-British industrial site with a probable pottery kiln was also found.

The Second World War GHQ Line runs south-east to north-west through the western end of the area and as described above (see Deangate) contains many surviving heritage assets of importance. The indicative illustration appears to show extensive new development, including a proposed neighbourhood centre between Ropers Lane and Bells Lane. The area is crossed by part of the General Headquarters (GHQ) stop-line between Hoo St Werburgh and Higham Marshes; a notable surviving example of anti-invasion defence. It is an important remnant of the Second World War defense landscape of the peninsula and is a well-preserved example of this type of defence, which is part of a major chapter in the national story. A group of pillboxes are located along the edge of the existing development along Bells Lane, two of which are listed (Grade II). The stop-line comprised an anti-tank ditch, pillboxes (both anti-tank and infantry), barbed wire entanglements, road-blocks and other features. The surviving remains form a coherent pattern of defence linked to the local topography. Extensive development here would result in the loss of part of the stop-line and would be harmful to the setting of the listed pillboxes. Development should not take place along the route of the GHQ stop line and its setting should instead be enhanced.

High Halstow

The area is centred on High Halstow village which retains its medieval core and includes a medieval church and tithe barn and several medieval buildings. Within the village, however, older remains have been discovered including Bronze Age and prehistoric features. Outside the village, several enclosures and cropmarks have been seen in aerial photographs. Metal detectorists working around the village have discovered numerous examples of artefacts, particularly from the iron age to the medieval period.

Immediately to the east of the area is the Fenn Street Second World War air defence post with associated radar station. The area also forms the northern extremity of the GHQ line in Kent/Medway and there are several surviving pillboxes and other features.

The area is also crossed by several industrial and military tramways such as the Port Victoria Railway, the Chattenden Naval Tramway and the Kingsnorth Light Railway.

The indicative illustration shows development between the existing village and Sharnal Street on a ridge of higher ground that forms part of the 'spine' of the Hoo Peninsula, with views towards the Thames to the north and the Medway to the south. The site may have been a favourable location for past occupation, having access to a range of natural resources. A number of Late Iron Age gold coins have been found to the north of High Halstow, whilst remains of Bronze Age date have previously been recorded south of the village. Within the illustrated development area itself various crop- and soil- marks have been observed indicating the presence of buried archaeological remains and landscapes. These crop-and soil- marks include a ring

ditch (possibly representing the ploughed out remains of a prehistoric burial mound), along with enclosures and other features. The area also has some potential to contain remains of Pleistocene/Palaeolithic interest.

Green Belt Release

Halling

It is not possible from the consultation document to tell exactly where this site is but it seems to be in or close by the Rochester Cement Works. It is possible that the development area thus lies in a site already subject to quarrying, in which case the below-ground archaeological potential may be limited although important industrial archaeology assets may still survive. If the site has not yet been disturbed then the site has archaeological potential related to its location on the historic route up the Medway valley. A prehistoric burial, possibly of Neolithic date, has been found to the north of the site and a second, probably Romano-British, burial found in the Bores Hole quarry to the north-west.

Outer Strood/Frindsbury

The development area lies in an area of general potential, particularly related to the prehistoric and Roman periods. Excavations for new housing on Hoo Road found Middle to Late Bronze Age features. Cropmarks of probable Bronze Age ring-ditches have been observed c. 1 km north of the development area. Excavations near Four Elms roundabout found evidence for prehistoric, Roman and medieval settlement. North-west of the area, a watching brief in 1977-9 found evidence for Roman occupation and a Roman bowl and associated finds were found at Brompton Farm. Roman Watling Street also runs to the south of the development area. Large numbers of finds have also been recorded by metal-detectorists including Roman and Medieval finds but also prehistoric flintwork.

Employment sites

West of Kingsnorth

The development area lies in an area of potential associated with its rural and low-lying character, close to the marshes east of Hoo. This includes deposits of Pleistocene and palaeo-environmental potential, probable prehistoric remains and land surfaces, several historic farmsteads and an extant historic landscape character.

Grain Power Station

The suggested development area lies east and west of Grain Power Station. As such there is considerable potential for undisturbed archaeological remains. These may relate to sands and gravels of Pleistocene date which could contain Palaeolithic finds and/or faunal (or other) palaeo-environmental remains, possible Late Neolithic – Early Bronze age funerary monuments and features associated with the Prehistoric exploitation of the Medway Marshes, evidence for Iron Age and Romano-British

occupation and activity, including potentially industrial activity associated with pottery or other manufacturing, other presently unknown non-designated archaeological remains and an aircraft crash site of Heinkel He 111H-2, which crash-landed on the Isle of Grain 7th September 1940.

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By E-Mail Only: futuremedway@medway.gov.uk

Tuesday, 31 October 2023

Dear Sir or Madam

MEDWAY LOCAL PLAN 2022-2040 – REGULATION 18 CONSULTATION

I am writing on behalf of our client National Grid and these representations are written in the context of their substantial landholding at the Isle of Grain. The site is owned by Thamesport Interchange Limited (TIL), which is a wholly owned and managed by National Grid.

These representations follow our previous submissions to the Council at the Issues and Options stage in February 2016, May 2017 and March 2018.

The existing Medway Local Plan (2003) shows that the site is allocated for employment purposes and part of the landholding has an extant planning permission for:

“the development for up to 464,685 sqm of built employment space for (Use Classes B1(c), B2 and B8 – including open storage), and up to 245 sqm of floorspace for a business park management centre (Class B1(a) and retail unit(s) (Classes A1, A3 and A5), with associated infrastructure, landscaping, car parking and access.”

In addition, the first phase reserved matters for this site (MC/15/1051) was approved in July 2015.

The site was previously an old oil refinery and this rich industrial heritage has been continued with a number of nationally significant energy users on the site. Two examples include Grain LNG, which has the ability to provide up to 20% of the UK's forecast gas demand and the BritNed interconnector, which operates the electricity link between the UK and the Netherlands.

Our representations below are made with the above context in mind and it should be noted that our representations only address those issues considered relevant to National Grid and its interests at TIL site on the Isle of Grain.

National Grid has discussed the strategic nature of the site with Medway on an ongoing basis and we look forward to continually working closely with officers in order to realise the potential of the site throughout the Local Plan process and beyond.

It is noted that this is an early-stage consultation to prepare a new Local Plan to set the framework for the area's growth up to 2040 and that the document is published in the first few months of the new Labour and Cooperative Group's administration of the Council.

The remainder of this letter comments on the document "Setting the Direction for Medway 2040", using some of the headings from the document:

Context

National Grid is supportive of the comments which are set out in the context section of the document. Important elements of this process are boosting the economy and acknowledging climate change as a global emergency.

Section 2.8 rightly acknowledges the diverse portfolio of employment land, including the "strategic landholdings at Grain and Kingsnorth" and it is interesting to note that the HIF funding for transport and infrastructure schemes has been withdrawn. It will be helpful to understand from Medway, what alternatives for securing investment in these matters are being explored over the next few years.

Strategic Objectives

It is noted that Medway is looking to deliver on the Council's commitment to addressing the Climate Emergency and National Grid would support this objective particularly in its support to the transition to 'zero carbon'.

The reference to securing jobs and developing skills for a competitive economy is also supported in particular the need to build on strengths and expertise, such as engineering, energy and creative industries to attract and develop jobs for the future.

The reference to regeneration and making best use of brownfield land are also strongly supported.

Developing a Spatial Strategy

It is noted that the plan needs to allocate sites for development for a variety of uses including housing and employment. It is interesting to note the constraints mentioned in this section and it is noted that Medway are looking at options (including urban regeneration sites, suburban expansion, rural development and green belt release) for potential housing delivery.

Whilst housing delivery is clearly important for the area, we would also support the need to provide employment sites within the Local Plan and to ensure that this is appropriately accounted for in any future designations.

In the Rural Development section, we would agree with some of the references made in this part of the document. It is vital to acknowledge that the Hoo Peninsula is characterised by wider industries, particularly the legacy of the energy sector at Grain and Kingsnorth. We fully support the assertion that Grain can form an important part of Medway's employment land supply and that it does offer unique opportunities for further jobs growth such as realising opportunities for green technology as the country moves towards zero-carbon.

It is also relevant to flag the important role that Grain currently plays in ensuring energy security during the transition towards 'net zero'. Recent world events have placed an increasing strain on energy supply and it is important that this security of supply is recognised during the Local Plan period up to 2040.

At 5.42 it is noted that Grain is referenced as offering potential for new employment sectors and being regional hubs in energy and green technology industries, contributing to de-carbonisation of the economy.

This is extended in the 'Employment Sites' section of the document and this section further recognises Grain's strategic importance on the Hoo Peninsula which references opportunities in specialist sectors, such as energy and green technology and making use of wharf facilities.

National Grid fully supports this reference and we are glad that the Council acknowledges these unique traits of this area and would support its inclusion in the Local Plan going forward. National Grid's facilities, wharves and the LNG pipeline already make significant contributions to the national energy network and the Grain site can further support, expand and add new facilities to these leading to an energy hub of national and regional strategic importance.

It is also worth noting that there is significant power generation already in situ at the Grain Peninsula and there is expected need for associated carbon capture and storage technology to allow this power generation to be sustained into the future to ensure national energy security.

We would note that there is a currently drafted 'employment sites' plan on page 27 of the document and we would like to continue to work with the Council to ensure that the correct areas of this plan (including all available potential development land) are allocated for appropriate development in the final version of the Local Plan.

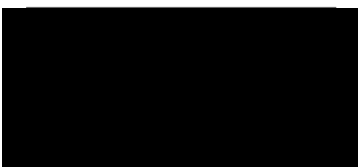
Conclusion

Overall, we are supportive of the approach being taken by the Council in preparing its new Local Plan. It is vital that the Council continues to recognise the strategic importance of the TIL site at the Isle of Grain in the new document. The potential for employment generating, energy related uses and links to the existing port related activities are extremely important to Medway from a strategic perspective and these need to be protected and actively promoted in the new Local Plan to ensure that these opportunities are fully exploited.

I trust you find the above comments to be helpful at this stage. We would be delighted to continue to liaise with Medway directly as the new Local Plan evolves, so please do not hesitate to contact me should you wish to discuss further.

In the meantime, I would be grateful if you could continue to keep the National Grid team informed of progress on the Local Plan.

Yours faithfully



Alister Henderson
Partner



Date: 31 October 2023
Our ref: 450953
Your ref: -



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Dear Catherine Smith

**Medway Local Plan
Regulation 18 Consultation**

Thank you for your email of the 25 September 2023 seeking Natural England's advice on the Medway Local Plan Regulation 18 Consultation and associated Sustainability Appraisal scoping report and Habitats Regulations Assessment.

Natural England remains committed to our shared objective with the Council of realising a sound local plan for Medway to facilitate economic growth whilst conserving and enhancing the rich natural and cultural heritage of the Medway area for current and future residents. We are providing this consultation response to the Local Plan Regulation 18 consultation report and also the accompanying Sustainability Appraisal and Habitats Regulations Assessment in this spirit.

We are keen to continue working with the Council as the Local Plan evolves and would welcome the opportunity to reinvigorate our previous collaborative ways of working.

I trust these comments are helpful; please do not hesitate to contact me if there are any queries of we can assist further with the Plan by email to sean.hanna@naturalengland.org.uk or by telephone on 0208 0266 064.

Yours sincerely,

Sean Hanna
Senior Adviser
Sussex and Kent Team

Natural England acknowledge that this is a high level, early stage consultation for the Local Plan. We note that draft policy wording and preferred site allocations will be provided at later stages of the Plan process and welcome the opportunity to provide comments at this early stage below.

Given the nature of the consultation, our comments are high level; we will of course be pleased to work closely with the Council in the coming months to ensure that the Plan ensures that the diverse natural heritage of the Medway area is conserved and enhanced, is more resilient to the impacts of climate change and provides high quality, accessible greenspace for residents whilst achieving sustainable economic growth.

1. Local Plan consultation

Section 2 - Context

Natural England welcomes the commitments for access to high quality greenspaces, the need for the Plan to address environmental challenges, including climate change and will be please to work with the Council in more detail on these matters as the Plan evolves.

Section 3 – Vision for Medway in 2040

Natural England broadly supports the Plan Vision (Section 3 of the Consultation) but would welcome a stronger commitment to conserving and enhancing the rich environmental heritage (both ecological and landscape) through the Plan period as part of sustainable strategy for growth. We have suggested some possible changes to the wording below which we hope helps support the vision for sustainable development within Medway (our suggested additions are underlined).

'Medway has ~~secured the best of its~~ conserved and enhanced its intrinsic cultural and natural heritage and landscapes alongside high quality development to strengthen the area's distinctive character. Medway has achieved 'green growth', development that has responded positively to tackling climate change, providing for healthier and more sustainable choices of homes, transport and workplaces, and reducing the risk of flooding. The countryside, coast and the urban open spaces are valued and benefit as joined up environmental assets in a resilient green and blue infrastructure network. Important wildlife and heritage assets are protected and enhanced contributing to the Local Nature Recovery Strategy. Medway has transitioned to a low carbon economy, with a clear path mapped out to reaching 'net zero.'

'All sectors and ages of the community can find decent places to live. The quality of new development has enhanced Medway's profile, and driven up environmental standards in construction, and older properties have been retro-fitted to improve sustainability. Custom and self-build housing has provided new living opportunities for residents. Investment in new services and infrastructure, such as transport, schools, healthcare and open spaces, has supported housebuilding to provide a good quality of life for residents including the retrofitting of accessible greenspaces to existing settlements.'

'Medway is a leading economic player in the region, supporting the growth of its business base and attracting new investment. It has capitalised on its cluster of higher and further education providers to raise skills levels across the workforce. Graduates and the wider workforce can develop their future careers in quality jobs in Medway. There is a broad portfolio of employment sites. Derelict sites at Grain and Kingsnorth on the Hoo Peninsula have been transformed into thriving economic hubs. Medway is known for its innovation and creativity, with businesses adapted to changes in the economy and the environment, and leading in green growth and technology, benefitting from excellent digital connectivity. High streets are sought after locations for a range of businesses, providing space for start-ups and co-working facilities that reduce people's need to commute. Medway's farmland produces quality food and drink and is contributing to the management of natural resources. The contribution of Medway's rich environmental heritage and the economic

benefit to the area is valued through eco-tourism.'

Section 4 – Strategic Objectives

Prepared for a sustainable and green future

Natural England welcomes the inclusion of this strategic objective and are broadly supportive of the wording. We would however support a stronger commitment within the objective to the use of nature based solutions for climate change adaptation including measures for coastal and surface water flooding and urban cooling, for example.

In addition, we would support the amendment of this objective to reflect the requirements of the National Planning Policy Framework (NPPF) and would we recommend the inclusion of the additional elements below.

For the first bullet point, in relation to the stated aim of reducing the risk of flooding, a reference to the need to incorporate sustainable drainage systems (SuDS) within any green infrastructure. Such an approach is in accordance with Paragraph 161 (c) of the NPPF which states that:

'All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: ...
c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management);'

For the third bullet point, we support the provision of a robust green and blue infrastructure networks which protect and enhances the existing assets. We would encourage the Plan to seek opportunities to secure the retrofitting of green and blue infrastructure in existing urban areas in addition to their inclusion within new developments. Such an approach, providing green infrastructure for existing settlements would help maximise the ecological, health related and wider ecosystem service benefits for residents that the green infrastructure network can deliver. We would also support the objective being strengthened by the inclusion of a clear reference to the delivery of net gains for biodiversity. Such an approach would be in accordance with Paragraph 180(d) of the NPPF which states that '...while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate'.

For the fourth bullet point, it may be possible to strengthen the effective management of water by the inclusion of a reference to incorporating water efficiency measures in new development, for example. Such an approach would be in accordance with Paragraph 161 (c) of the NPPF.

Supporting people to lead healthy lives and strengthening our communities

Natural England also supports this strategic objective but again, to further strengthen the wording in relation to NPPF compliance, we recommend the amendments below.

For the second bullet point, open space and local green space are important elements of green infrastructure in relation to this section's proposed delivery and the protection and enhancement of public rights of way (including the King Charles III Coast Path and other National Trails). (NPPF 100.) Natural England supports the delivery of inclusive areas of green infrastructure that are accessible by all groups in society. As the Plan evolves, we would support the Council making reference to, and committing to achieving the Green Infrastructure Standards¹ for residents.

¹ <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/GIStandards.aspx>

Securing jobs and delivering skills for a competitive economy

Natural England welcomes the recognition that green tourism can support the economy of Medway and as recommended above, we would support eco-tourism being more fully recognised within the Plan vision.

Boost pride in Medway through quality and resilient development

Natural England broadly supports this objective providing the preferential use of brownfield land. The Plan area has nationally important biodiversity assets on brownfield sites and we would recommend, as sites are considered for allocation, this is in accordance with the definition of 'previously developed land' within the glossary of the NPPF which states that:

'Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: ... land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'

This fourth bullet point of this strategic objective offers an opportunity to require all new development to have design standards for high quality place making, including landscape character and green infrastructure. We would support green and blue infrastructure to be included as an integral component of raising the standards of sustainability and quality for all development including delivery of urban nature recovery. As the plan progresses, it feels appropriate to reference the Green Infrastructure Framework Standards and the further guidance contained within the Green Infrastructure Planning and Design Guide². These provide details of what good green infrastructure design looks like, linked to the ten characteristics of well-designed places as set out in the National Model Design Code³ and the National Design Guide⁴.

Section 5 – Developing a spatial strategy

Natural England notes that the Local Plan, using the 'Standard Method' for determining the scale of housing is needing to allocate land for 28,500 residential units up to 2040. Natural England recognises the challenge facing Medway in developing its local plan and we will be pleased to work proactively with the Council to ensure that the allocations which proceed avoid or fully mitigate their impacts to designated sites, protected landscapes and wider biodiversity whilst also ensuring impacts to wider environmental priorities such as agricultural soils are avoided or minimised.

Natural England notes in Section 5.7 the Council's commitment to resolving congestion at Junction 1 of the M2; this junction largely falls within the Kent Downs Area of Outstanding Natural Beauty (AONB) and we would be pleased to work with the Council alongside the AONB Unit to ensure any proposals are in accordance with the NPPF.

In relation to the sites identified within the Land Availability Assessment (which identified the potential capacity for approximately 38,200 houses) (Section 5.15), Natural England would support the use of a comprehensive and robust suite of sustainability indicators to screen these sites. Those sites where environmental impacts can be avoided or fully mitigated, whilst meeting the Plan objectives, should then proceed for further consideration. For sites where potential impacts to designated sites, protected landscapes or wider environmental assets could result, detailed evidence (such as the Council's draft Cumulative Ecological Impact Assessment) should be used to fully consider potential site allocations.

² <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/DesignGuide.aspx>

³ <https://www.gov.uk/government/publications/national-model-design-code>

⁴ <https://www.gov.uk/government/publications/national-design-guide>

For the 'Urban Regeneration' scenario, some of the sites along the River Medway and at Chatham Docks fall immediately adjacent to the Medway Estuary Marine Conservation Zone (MCZ) (as detailed within Section 5.25). Other sites along the Medway Estuary appear to lie in close proximity to the Medway Estuary and Marshes Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar site. Natural England recommends that a full consideration of the potential for direct and indirect impacts to these sites (including from climate change and coastal squeeze), and whether they can be avoided or fully mitigated, is undertaken before they proceed for further consideration as allocations. If impacts cannot be avoided or fully mitigated, then other sites with lesser or no environmental impacts should preferentially proceed to allocation in accordance with the 'avoid, mitigate, compensate' hierarchy within the NPPF.

As with the 'Urban Regeneration' scenario, some of the 'Suburban Expansion' sites fall within close proximity to the Medway Estuary and Marshes SSSI, SPA and Ramsar Site and the Medway Estuary MCZ. In addition, the sites to the south of the M2 motorway fall within the Kent Downs AONB. We would again recommend that a full assessment of the potential impacts, and scope for avoidance or mitigation of impacts, to these sites is undertaken prior to their further consideration for allocation.

Similarly, for the 'Rural Development' site scenario, potential direct and/or indirect impacts to the Chattenden Woods and Lodge Hill SSSI, the Medway Estuary and Marshes SSSI, SPA and Ramsar site, the South Thames Estuary and Marshes SSSI, the Thames Estuary and Marshes SPA and Ramsar site and the Kent Downs AONB may result from some of the sites. We would therefore recommend that a full assessment of the potential impacts, and scope for avoidance or mitigation of impacts, to these sites is undertaken prior to their further consideration for allocation.

For the 'Greenbelt Sites' that fall within the Kent Downs AONB and we would recommend that a full assessment of the potential impacts to the AONB are considered, in accordance with the Paragraphs 176 and 177 of the NPPF prior to their further consideration for allocation. In addition, these sites would need to be considered in light of Paragraph 142 of the NPPF.

The 'Employment' sites identified within the Consultation on the Isle of Grain and the Hoo Peninsula have the potential to result in direct and indirect impacts to the coastal SSSIs, SPAs and Ramsar sites along with the Medway Estuary MCZ. Previous studies have also identified some of these land parcels as being rich in the invertebrate assemblages they support, due in part to the priority open mosaic habitat on previously developed land. As such, Natural England would again, recommend that a full assessment of the potential impacts, and scope for avoidance or mitigation of impacts, to these sites is undertaken. For the sites adjacent to the M2, these all fall within, or within the immediate setting of, the Kent Downs AONB. The sites along the River Medway is also adjacent to the Medway Estuary MCZ. We would therefore recommend that a full assessment of the potential impacts, and scope for avoidance or mitigation of impacts, to these sites is undertaken before their further consideration for allocation.

In addition to these site specific considerations, Natural England would recommend that consideration to wider environmental assets should form part of consideration for all sites prior to their consideration for allocation. This should include, for example, the following:

- Potential for impacts to best and most versatile soils, where impacts cannot be avoided preference should be given to sites with lower grade agricultural soils (where this does not conflict with other sustainability objectives);
- Potential for impacts to local wildlife sites and local nature reserves;
- Potential for impacts to significant populations of protected and/or priority species (the Council's draft Cumulative Ecological Impact Assessment and/or data from the Kent and Medway Biological Records Centre may assist with this assessment);
- Potential for impacts to priority species (the Council's draft Cumulative Ecological Impact Assessment and/or data from the Kent and Medway Biological Records Centre may assist with this assessment);
- Potential for impacts to green and blue infrastructure (including impacts to key sites identified within the emerging green and blue infrastructure strategy);

- Potential impacts to delivery of the Local Nature Recovery Strategy;
- Potential impacts to other strategic plans or projects such as Climate Change Plans, Shoreline Management Plans, AONB Management plans etc.

As mentioned previously, the sites with no, or the least environmental impact should be those which proceed for further consideration as part of a sustainable growth approach. Opportunities for delivery of significant environmental gain for people and wildlife should also be considered as part of the Sustainability Appraisal of the potential site allocations.

2. Sustainability Appraisal

Natural England broadly supports the measures within the Sustainability Appraisal Scoping Report (dated September 2023) but have a few comments to make in relation to the decision making criteria and the associated indicators which we hope are helpful.

For Objective 2 (Climate Change Adaptation), Natural England would support the inclusion of an indicator on nature based solutions to flooding (both coastal and surface water) and measures to mitigate the impacts of coastal squeeze.

For Objective 3 (Biodiversity and Geodiversity), Natural England would support the inclusion of an indicator in relation to the Local Nature Recovery Strategy. We would also support the inclusion of an indicator relating to the Green Infrastructure Standard, perhaps relating to the achievement of the 'Accessible Greenspace Standard', for example.

For Objective 4 (Landscape and Townscape), in addition to the consideration of impacts to the Kent Downs AONB, Natural England would support the indicators including a consideration of whether the scheme will conserve and enhance the AONB.

For Objective 5 (Pollution and Water), Natural England would support the inclusion of ecological receptors within the indicators.

For Objective 6 (Natural Resources), Natural England recommends that the indicators should reflect the 'previously developed land' definition within the NPPF and also reflect how the highest grade agricultural soils are prioritised within the consideration of potential site allocations.

For Objective 8 (Health and Wellbeing), Natural England recommends that the indicators are updated to reflect the Accessible Greenspace Standards⁵ within the Green Infrastructure Standards.

3. Habitats Regulations Assessment

Natural England welcomes the accompanying Habitats Regulations Assessment of the Local Plan consultation. We have no comments to make at this stage but will be pleased to work with the Council on future iterations of the Assessment as the Plan evolves.

5

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Standards%20for%20England%20Summary%20v1.1.pdf>



www.tmbc.gov.uk/localplan

localplan@tmbc.gov.uk

Catherine Smith
Medway Council

Contact

Email

Date

25/10/2023

Dear Catherine,

Re: Medway Local Plan Regulation 18 consultation

Thank you for consulting Tonbridge and Malling Borough Council (TMBC) on the Regulation 18 Local Plan. Having considered the document, we wish to make the following comments.

TMBC understand that the Regulation 18 Local Plan sets out the vision, strategic objectives and outlines potential options for where new homes, workplaces and services may be built. Strategy options being considered include urban regeneration, suburban expansion, rural development and Green Belt sites. We acknowledge that it does not detail policies or identify those sites preferred by the Council for new development and that this detail will come in the next stage of work on the Local Plan, due to be published next year. Consultation runs from Monday, 18 September to Tuesday, 31 October 2023.

We note that Medway has an identified housing need for 1,667 homes a year, or around 28,500 over the plan period to 2040. Taking into account sites with planning permissions but not yet built, and a windfall allowance, the Council is assessing options to allocate land for over 19,000 new homes to meet needs in Medway. In addition, the Medway Employment Land Assessment, 2020 indicates a need for c 62.3 hectares of employment land up to 2037. The majority of the land would be needed for warehousing and distribution activities.

We also note, that following a request from a neighbouring borough, Medway Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham's housing needs.

Within the document, two sites are identified that have potential cross-boundary implications for Tonbridge and Malling. One is a large site located to the south-west of Halling,

Planning Policy, Gibson Building, Gibson Drive, Kings Hill, West Malling,
Kent ME19 4LZ

Director of Planning, Housing & Environmental Health:
Eleanor Hoyle (MA)
Head of Planning: James Balley

Have you tried
contacting us at
[www.tmbc.gov.uk/
do-it-online?](http://www.tmbc.gov.uk/do-it-online?)

immediately adjacent to the borough boundary. The second is a site at Rochester Airport identified for employment uses, which includes land within Tonbridge and Malling.

Site south-west of Halling: CHR4

The site south-west of Halling lies adjacent to the borough boundary. Land immediately to the south of this site, within Tonbridge and Malling, has been submitted for consideration through our own Call for Sites exercises. TMBC are currently gathering evidence to support plan preparation, and as a result no decisions on potential allocations have yet been made. We acknowledge that there may be potential cross boundary issues should these sites be supported through our respective Local Plans and are happy to work together as needed.

The site south-west of Halling lies in the Green Belt and in the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB). Regard should be had to potential impacts on the protected landscape in this location, both alone and in combination. The site is also in close proximity to the North Downs Woodland Special Area of Conservation (SAC), located to the west. Regard should be had to potential likely significant effects on this designated site and if allocated, the site should be tested through the Habitats Regulations Assessment accompanying the Local Plan. Although we understand no decisions have been made on sites, if you were minded to proceed with this site, we would suggest the further work would be required to understand the impacts on Green Belt, the protected landscape and its setting, as well as the internationally protected wildlife site.

In addition, the council would expect detailed transport modelling to be undertaken to investigate the potential traffic impacts of this site on the A228, ideally using the Kent Model. Our published [Initial Baseline Transport Assessment](#) that accompanied our Reg18 Local Plan consultation, confirms the location of junction and link hotspots at the 2019 baseline year. These include sections of A228 (between Holborough Road and Rochford Road), which exhibit severe levels of delay (LOS E and F and V/C > 85%). (Paragraph 5)

The report further concludes at paragraph 4.5.1 that when comparing the 2040 and 2019 models, a significant increase in traffic is predicted along major corridors including the A228. More recent modelling work undertaken in relation to the Lower Thames Crossing DCO Examination further confirms the potential deterioration in the operational capacity of the A228 and its junctions due to the potential combined impacts of local growth and Lower Thames Crossing.

Given the scale of this site, highways mitigation would be required due to additional traffic volume and queueing at junctions which will include Peters Village and Holborough roundabouts as well as the Snodland bypass in Tonbridge and Malling, which becomes congested at peak times due to the single carriageway narrowing between Holborough Road and Rochford Road junctions.

Site at Rochester Airport: FH1

The employment site at Rochester Airport spans the borough boundary and identifies land within Tonbridge and Malling. This site has not previously been promoted to TMBC through our Call for Sites exercises. However, the site appears to be the site of Innovation Park Medway which is to be delivered in accordance with the terms of the Local Development Order (LDO). TMBC are happy to engage in cross-boundary discussions regarding this site, and to continue to work together on the LDO and masterplan for the site.

Other comments

In addition to the sites discussed above, it would also be useful to understand how the yield figure of 38,200 homes in paragraph 5.15 has been generated.

Finally, paragraph 5.26 identifies that some sites identified have not been proposed by landowners. TMBC welcomes the intention of Medway Council to engage in further discussions with landowners/promoters to determine the availability of these sites.

Yours sincerely,

[REDACTED]

[REDACTED]

Tonbridge and Malling Borough Council

Direct line: [REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, October 30, 2023 1:06 PM

[REDACTED]
[REDACTED]
[REDACTED]

Subject: Comments on the Medway Plan

I am writing with regards to the proposed Medway Plan which I recently viewed at the Riverside Country Park. The following items concerned me and they are as follows:

1. House building – whilst I understand that there is a need for housing I am concerned that local residents are missing out on accommodation to London Residents (Anchorage House being an example). This is unfair to local residents who need housing. London Boroughs should be housing their own residents not gentrifying their areas and pushing poorer people out of London. I also understand that Gravesham Council have asked Medway Council to build 2000 homes on their behalf. Why is Medway building on behalf of another Council?
2. Building on the Hoo Peninsula has really got to be stopped with no further houses built there. The roads cannot take any more traffic. At peak times all roads leading to Four Elms Hill roundabout are at a virtual standstill. As for wanting to build homes at Cliffe, and further homes at Cliffe Woods, the B2000 is too narrow and is becoming a dangerous road to travel on. In short, the infrastructure in these areas is not adequate for further traffic. If you think that building cycle lanes will make people cycle more then good luck with that.
3. I cannot understand why you are considering building at Chatham Docks. Once the docks are gone they are gone forever. Why does Medway Council even consider that this would be a good place to build homes?
4. Staying on the subject of house building, I notice that there is no mention of building of doctor's surgeries or indeed a new hospital. The Hoo Peninsula does not have adequate medical facilities. More people moving into the area = more medical facilities needed. My brother, who lived in Chatham, had a heart attack and waited four hours for an ambulance to arrive. The hard working paramedics got his heart beating but he eventually died because he was brain dead. You can see why I am passionate about there being adequate medical facilities for all residents of Medway. Medway Hospital and the ambulance service is at breaking point and a new hospital is needed if more people are moving into the area.
5. I cannot understand why you are considering building at Chatham Docks. Once the docks are gone they are gone forever. Why does Medway Council even consider that this would be a good place to build homes?
6. I notice that brown field sites have been identified for building on. This is certainly better than building on agricultural land. I was astonished at how many houses have been built at Otterham Quay Lane on what used to be orchards. Agricultural land should be left as agricultural land. Once agricultural land is gone it is gone forever.

I hope the above will be taken into consideration when making decisions for Medway. I can assure you that I speak on behalf of many people with my comments. I have often heard it said that Medway is now being called 'The London Borough of Medway' and if the current practise of house building for people moving into the area is to continue then I can see some truth in this.

Thank you for your attention with regards to the above.

Regards

[Redacted]

[Redacted]

headley, andrew

From: policy, planning
Sent: 26 September 2023 15:23
To: futuremedway
Subject: FW: Contact Form from OpusConsult

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Reg 18 email Responses

From: Medway Council [REDACTED]
Sent: Friday, September 22, 2023 7:45 PM
To: policy, planning <planning.policy@medway.gov.uk>
Subject: Contact Form from OpusConsult

You have received a message from the OpusConsult contact form

From: [REDACTED]

Email: [REDACTED]

Message:

I wish to follow what is happening about The Strand, Gillingham. It has been continually going down hill for local people. This summer the paddling pool was not in use. Can we find out why? Also are there plans in the future for what used to be the golf and crazy gold areas?

Medway Local Plan 2022-2040 Consultation 2023 – MLD

Response

31st October 2023

Dear Local Plan Consultation Team,

Below is the response on behalf of Medway Liberal Democrats (MLD) to the current Medway Local Plan Regulation 18 consultation.

The details of our findings and our alternatives are provided below and on the marked-up plans.

The lack of reference to consultancies within the body of the text and the lack of appendices raises unease regarding the development of the proposed plans.

Our response raises concerns over the following matters:

- The use of only one colour for all the hatching on all five maps leads to the lack of differentiation which doesn't allow for deep critical response
- The maps are of different scales, and information that is pertinent in terms of development is not interrelated nor referenced between the maps
- The lack of proposed infrastructure design is conspicuous by its absence – this is not only roads, but potential rail (including light rail) and cycle paths are not mentioned in the document
- The lack of identification what type of housing is to be proposed for the various areas makes it difficult to ascertain what is being proposed for each of the areas that are hatched
- The lack of improvements to pedestrian and existing cycle routes
- Approach taken to consultation

The initial rush to publish the “Setting the Direction for Medway 2040” means that there needs to be a much deeper and a better designed document for true consultation.

Yours faithfully,

Cllr Andrew Millsom BEng(Hons) BA(Hons) PgD CEng MICE MIStructE



Medway Liberal Democrats

Medway Local Plan 2022-2040 Regulation 18 Consultation – MLD Response

Introduction

Medway Liberal Democrats (MLD) welcome the new administration's positive attitude in revamping the Local Plan with the first stage "Setting the Direction for Medway 2040". The document describes what the Local Plan is about, but it doesn't really go into any part the proposals with meaningful depth.

Thus, MLD are concerned that the current document is too bland and shy on detail with regard to the proposals for there to be a meaningful response.

Responses to the consultation document

- The report is almost the opposite of the HIF reports, because on the maps, areas that are to be considered for housing are identified. Whereas the infrastructure that shall need to be constructed to support the additional housing is not mentioned, nor shown (even in outline format) on the five maps. The very opposite of MLD's response to the HIF reports.
- The amount and density of housing is not identified on the maps, all that is stated with regards to the amount of housing per the zoning on the maps is described in Table 1. None of the maps allocate the numbers of housing to anyone of the hatched areas. Therefore, it is difficult to understand how these values have been determined.
- The most critical point is that the same type/colour of hatching is used on all five maps – there is no differentiation between the types of housing that is to be built.
- In the next stage MLD would like there to be types/colours of hatching with an appropriate legend on each map to describe what is to be provided, and that maps reference the hatched areas of adjacent zoned areas on other maps.



Medway Liberal Democrats

Responses to specific sections within the report

- 2.10 The consultation document has been drawn up following withdrawal of Government funding from the Housing Infrastructure Fund (HIF) for strategic transport and environmental schemes – so MC will look for alternative means of securing funding – but nothing is provided as to how this shall be achieved

3.0 Vision for Medway in 2040

- 3.1 This whole section needs to be in the future tense otherwise it reads as if all this is happening now
Improved travel choices - there needs to be more information on how the council intends to improve walking, cycling and buses, but at the same time allow for adequate use of the car, particularly in outlying areas. As Liberal Democrats we are in favour of safe cycle routes.
Medway will be a healthy place - Liberal Democrats feel that priority should be given to clean air
Older properties have been retrofitted to improve sustainability. As Liberal Democrats we feel that the Local Plan should be improved to include retrofitting insulation.
Generally, MLD remains of the opinion that the transport has not developed enough.

4.0 Strategic Objectives

- 4.2 Prepared for a sustainable and green future.
MLD would like all village greens and commons to be given commons registration including Hook Meadow, Frindsbury Green, Grain Green, Gillingham Green, Rede Common and Hoo Common.
To reduce inequalities in health, through provision of healthcare and better housing.
MLD would like to hear how Medway is to ensure that there is adequate healthcare provision.
There is no mention of schools in housebuilding areas. This is a significant part of the social infrastructure that shall be required for the degree of proposed housing. There should be better definition of tertiary education, rather than just support for universities.
There is no mention of tourism or creation of cycle routes on Hoo Peninsula or even mention of the Haven Holidays site at Allhallows.
“Boost Pride in Medway” – a laudable aspiration, but there aren’t any meaningful concepts on how this goal is to be achieved.
To ensure that development is supported by the timely provision of good quality, effective infrastructure. We need to ensure that there are adequate flood defences in place



Medway Liberal Democrats

To secure the ongoing benefits of Medway's regeneration... bearing in mind rising sea levels

To ensure there is adequate water, sewerage, gas, electricity and telecoms for all new developments

Improve water infrastructure, e.g leisure use

5.0 Developing a Spatial Strategy

5.4 Encourage the building of granny annexes which can be used by children if they are unable to leave home due to lack of affordable housing and then when the parents become elderly, they can move into the granny annexe and the children move into the main house thus ensuring that the parents have all the support they need as they become more disabled.

More robust development of empty houses, including vibrant for council/private/non-profit development.

5.11 Liberal Democrats object to assisting Gravesham Council meeting its housing capacity by allowing an additional 2,00 homes in the Medway area.

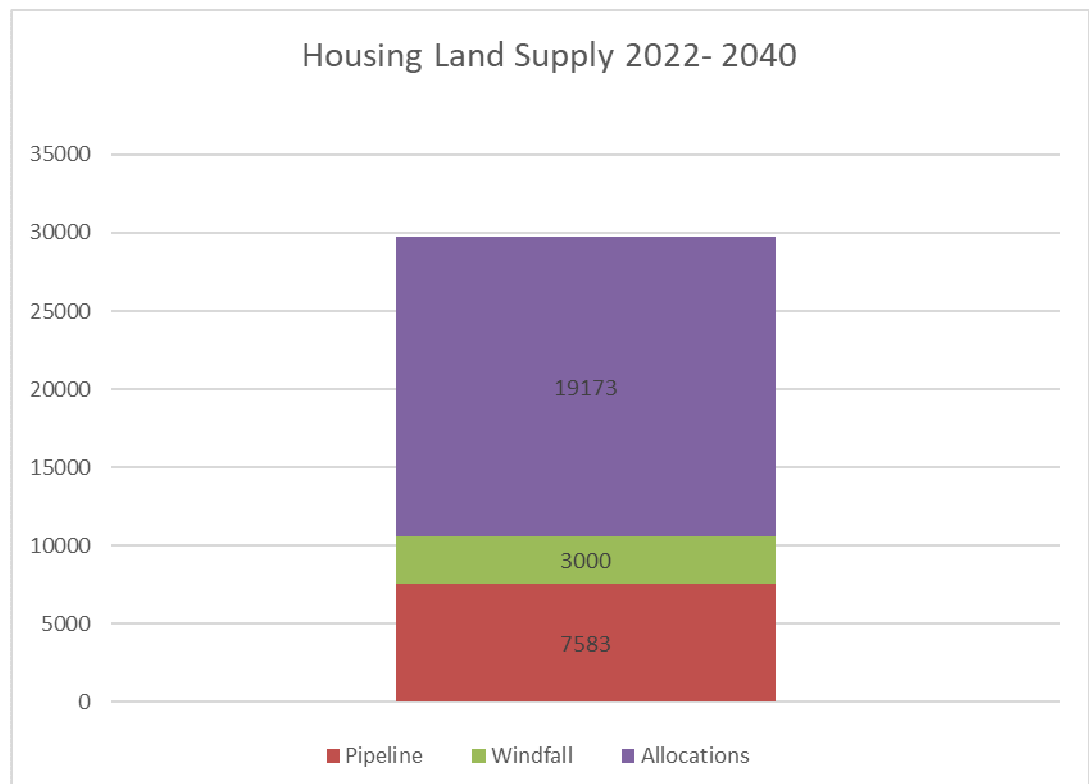


Figure 2 – potential sources of housing land supply for Local Plan

Figure 2 How did the Council arrive at the figures of 19,173 for allocations and 3,000 for the windfall housing?

The total housing for this figure is 29,756, yet the housing provision limit set by central government is 28,500 (5.11), whereas section 5.12 sets



Medway Liberal Democrats

housing at 28,339 homes (and then includes a buffer, so necessity becomes 29,000).

- 5.16 The Council has ascertained a potential decide to find land for 38,761 houses when Figure 2 only suggests a figure of 19,173

Category	Potential Housing Capacity (from LAA)
Urban regeneration	11,151
Suburban growth	9,680
Rural development	14,736
Green Belt loss	2,649
Total potential supply	38,216

Table 1: Potential sources of housing land supply by category

- Map 1 Urban Regeneration Sites** – (refer to the marked-up map in conjunction with the description) The plan is too vague over what kind of development is proposed in these areas, as there is the same hatch being used for housing, schools, business and industrial areas. It is also out of date around Rochester Peninsula - it does show the new developments

- 5.21 MLD object to the building of houses on Chatham Docks and Medway City Estate, and also object to the relocation of existing businesses from these two employment zones.

- 5.23 There is no mention of the empty offices in Dockside.

- Map 2 - Suburban Expansion Sites** – (refer to the marked-up map in conjunction with the description) a large portion is Capstone Valley - there is no mention of housing densities here, they are building on Hook Wood, there is no mention of infrastructure - the roads are clearly unsuitable for large amounts of traffics. We are concerned about the negative impact on Capstone Farm Country Park.

Lower Twydall/Lower Rainham - we feel the development should be curtailed here due to the negative impact on the conservation area and building on the flood plain and community assets should be avoided. This area is going under water by 2030. We should also avoid archaeologically sensitive areas. We note that building is proposed on Motney Hill near the sewage works.

- Map 3 - Rural Development Sites** - (refer to the marked-up map in conjunction with the description) Liberal Democrats note with dismay that housebuilding is proposed on Deangate Ridge and Cockham Wood and adjacent farmland. Both areas were included within country community parks. Liberal Democrats would like both country parks reinstated.

Buckland Lakes - The lakes are to be integrated with the tidal Thames by 2030 so Medway Council will need to build substantial sea defences if they



Medway Liberal Democrats

are going to allow building here. Of note this area is part of the London flood plain.

There should be no building at Three Crutches, near Stoke or on the link between Hoo and High Halstow. There should be adequate sewerage and potable water in this area - at the moment this is operating beyond capacity.

- 5.45 There is a need to increase supply of clean water and sewerage capacity. This needs to be incorporated into the next stage report of the Local Plan.

Map 4 – Green Belt Sites – (refer to the marked-up map in conjunction with the description) the potential release of land within existing greenbelt – There should be no development in the green belt at Upper Bush as this would not represent sustainable development, due to lack of public transport and road capacity. There is no objection to developing the Halling/Holborough site provided the development stays within the envelope of the brown field site and not encroaching the AONB.

Map 5 – Employment Sites - (refer to the marked-up map in conjunction with the description) There is not enough land set aside for employment given that the Council is apparently going to allow housing on Chatham Docks and some on the Medway City Estate. MLD request that Chatham Docks is put on the Employment Sites map. There is poor transport to Grain for personnel and driving all the way to Grain would not represent sustainable development (given the lack of public transport). There is the risk of traffic jams at Grain. The site north-east of Kingsnorth should be reinstated onto the housing Rural Housing map, similar to how it was in the HIF.

- 5.57 Why has the Council decided that employment land should be used for warehousing and distribution? Have the Council decided they are being taken over by Amazon. What about high tech businesses? Warehousing is not high-quality employment.

It is noted that Map 5 is only looking at floorspace not the number of potential jobs and note with dismay that the extra employment space will not compensate for the loss of floorspace at Chatham Docks and Medway City Estate.

Highways

There is no highways section within the report, yet new infrastructure shall be required to permit residents to access their new homes. In the next stage MLD expects infrastructure to be a major portion of the Local Plan.

Cycle Paths

The of the highway funding and some of the greenspaces funding to design and construct a network of cyclepaths that can be used for both commuting and leisure.



Medway Liberal Democrats

Commuting Cyclepaths

Cycling to and from work and schools has become popular in recent years and we think that a portion of the highway budget should be spent on building new cyclepaths that are biased towards commuting.

Leisure Cyclepaths

These use a combination of the new stations, existing roads and new cyclepaths to allow locals and visitors to cycle around the beautiful parts of the peninsula.

Conclusion

- The document is extremely light on actual use of land that is identified in the brochure and the five maps. We have raised our concerns about not incorporating former Lodge Hill Camp SSSI into Lodge Hill Community Park and that Chattenden Woods is to be a separate SEMS.
- The dismal rail section in the second-round brochure is very disheartening – after almost a year from the aspirations of the Higham Curve and potential rail services – it is perturbing that the rail portion still has GRIP 2 level work and no indication of a future rail strategy for Hoo Peninsula
- The updated highway proposals still have many flaws, ranging from order of phasing of the works, to building of new “rat runs” that shall fail on numerous criteria.
- The two currently over-loaded junctions, i.e. Four Elms Roundabout and Sans Pareil Roundabout remain inadequately addressed.
- There is very little in terms of new cyclepaths
- The report lacks any budgets, it does not identify where funding shall be obtained to construct the infrastructure required to accommodate the proposed expansion in housing.

MLD Recommendations

Environmental Improvements

- The proposed community parks in the HIF document need to be reintroduced into the Local Plan – the two significant ones being Cockham Wood Community Park, and Lodge Hill and Deansgate Community Park.
-

Rail Proposals

- Consideration should be given to potential light rail, as this becomes a viable concept for the high density zones when population is in the order of 300,000.

Highway Proposals

- Highway infrastructure needs to be added to the plans.



Medway Liberal Democrats

- Grade separated junctions to be considered in a number of locations to improve traffic flow. designed and constructed at the Four Elms and The Sans Pareil roundabouts.
- Junction improvements to be made to existing roads and highways for the connecting of those roads required for accessing the proposed new estates.
- There needs to be more effort given to providing commuting cyclepaths which specifically connect urban entities, e.g. residential areas to industrial estates and schools.



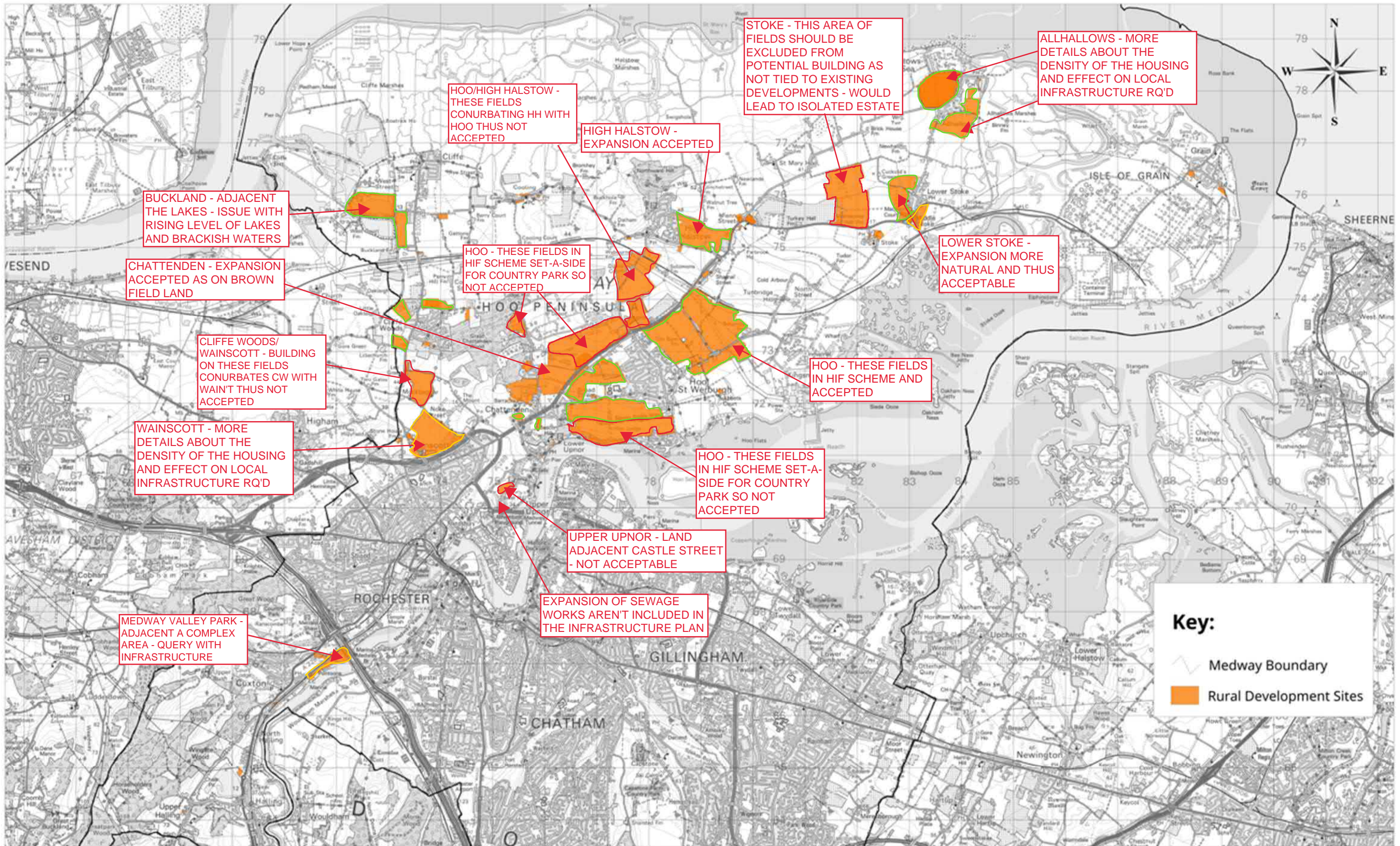
Title: Employment Sites



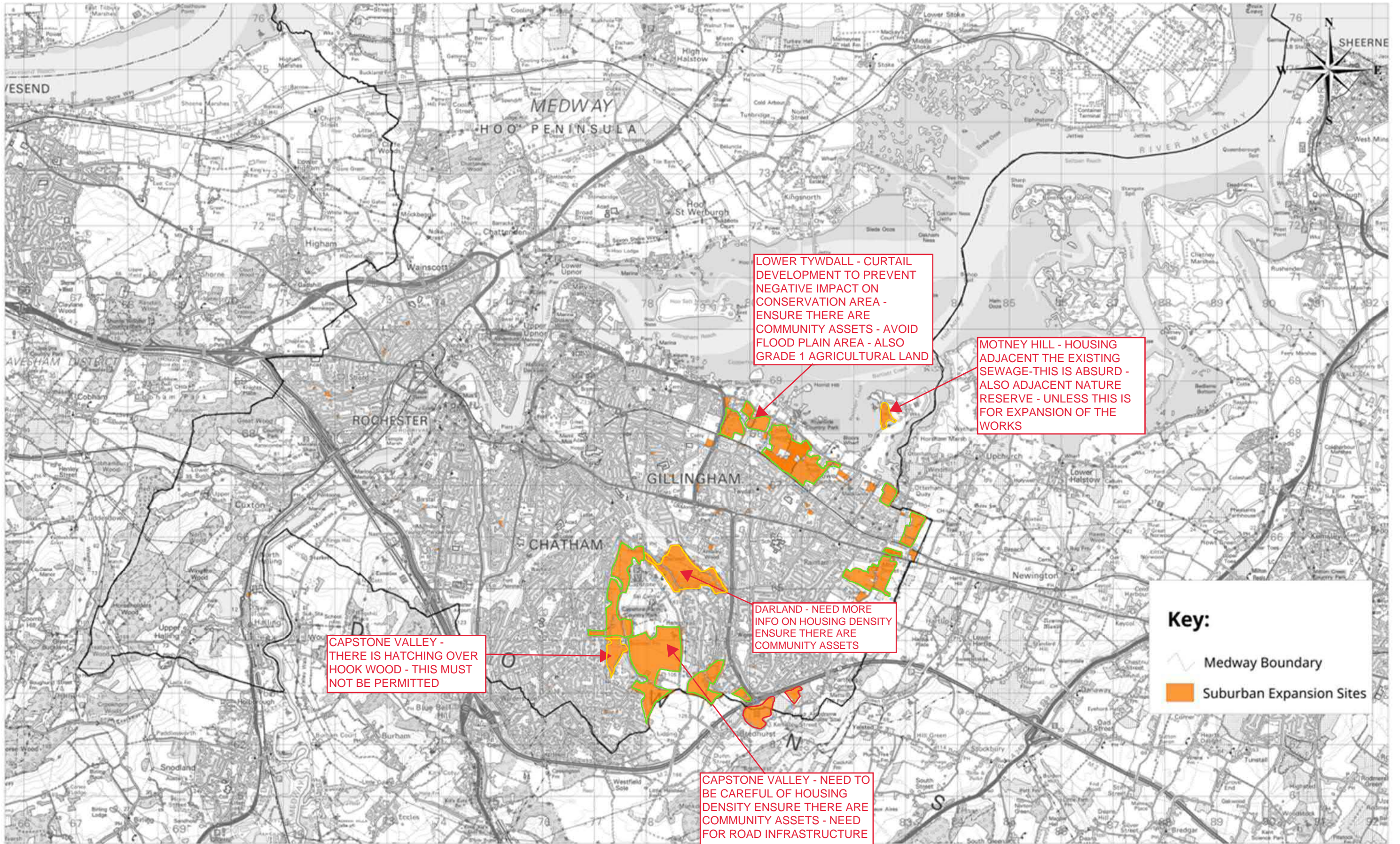
Title: Greenbelt Sites

- ACCEPTED EXPANSION ZONES
- REJECTED EXPANSION ZONES



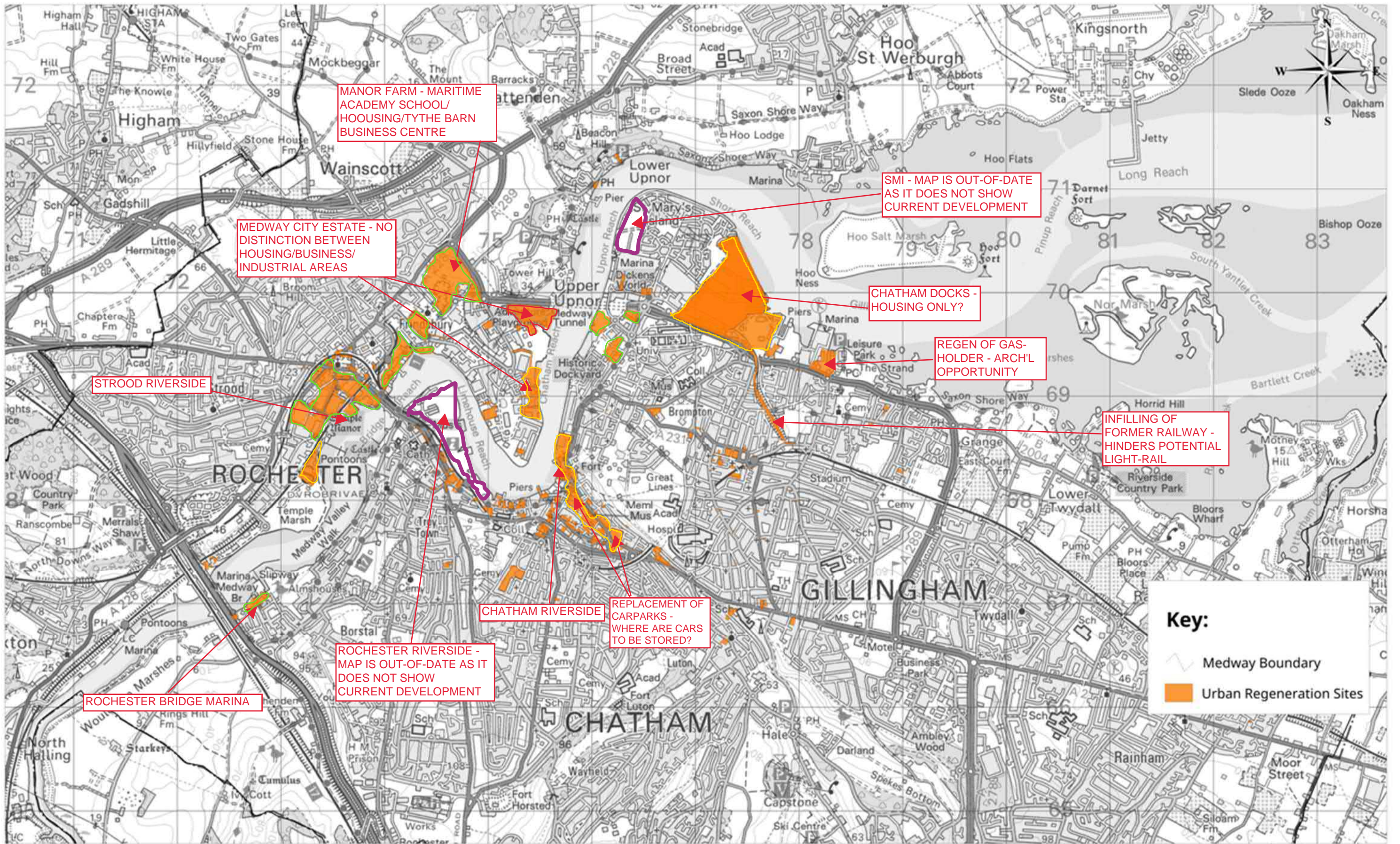


Title: Rural Development Sites



Title: Suburban Expansion Sites

- ACCEPTED EXPANSION ZONES
- EXPANSION ZONES THAT REQUIRE CLARIFICATION
- REJECTED EXPANSION ZONES



Title: Urban Regeneration Sites

headley, andrew

From: [REDACTED]
Sent: 20 October 2023 19:09
To: futuremedway
Subject: Fw: Medway Local Plan e-bulletin (fifth edition)

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

I have seen the consultation presentation at Medway sports centre recently.

Very interesting how it is geared towards building accommodation and businesses

What seems to be lacking from my perspective is sports and recreation, also tourism especially on the river.

The river is such a large area but access to users and tourists is very poor to the extent of being neglected by Medway Council.

[REDACTED]

----- Forwarded message -----

From: Medway Council <medwaycouncil@public.govdelivery.com>

To: [REDACTED]

Sent: Friday, 20 October 2023, 15:56:25 BST

Subject: Medway Local Plan e-bulletin (fifth edition)



Medway Local Plan Newsletter (Edition 5)

Welcome to the fifth edition of our Local Plan Newsletter: bringing you the latest news on the creation of Medway's new Local Plan, which will outline Medway's growth plans up to 2040.

We now have less than two weeks to go on the consultation for Medway's emerging Local Plan.

The good news is there's still plenty of time to take part and comment on the priorities, theme and vision that will make up the new plan.

[View our information video here](#)

The consultation closes at 11:59pm on Tuesday, 31 October 2023.

Got a question? Email us at futuremedway@medway.gov.uk

How to take part in the consultation

[Visit our online consultation platform to take part](#)

[Download our consultation document](#)

[Find out more](#)



Final events this week

This week saw our final events take place for this consultation period. The project team visited Lordswood Leisure Centre and Hundred of Hoo Secondary School, providing local communities with the chance to see the proposals up close and ask any questions to our team.

In total we've run seven events over the last three weeks, attracting hundreds of residents.

Thank you to everyone who came along to an event.

If you have any feedback on the events, please email futuremedway@medway.gov.uk



Read the new Local Plan Blog from our Chief Planning Officer

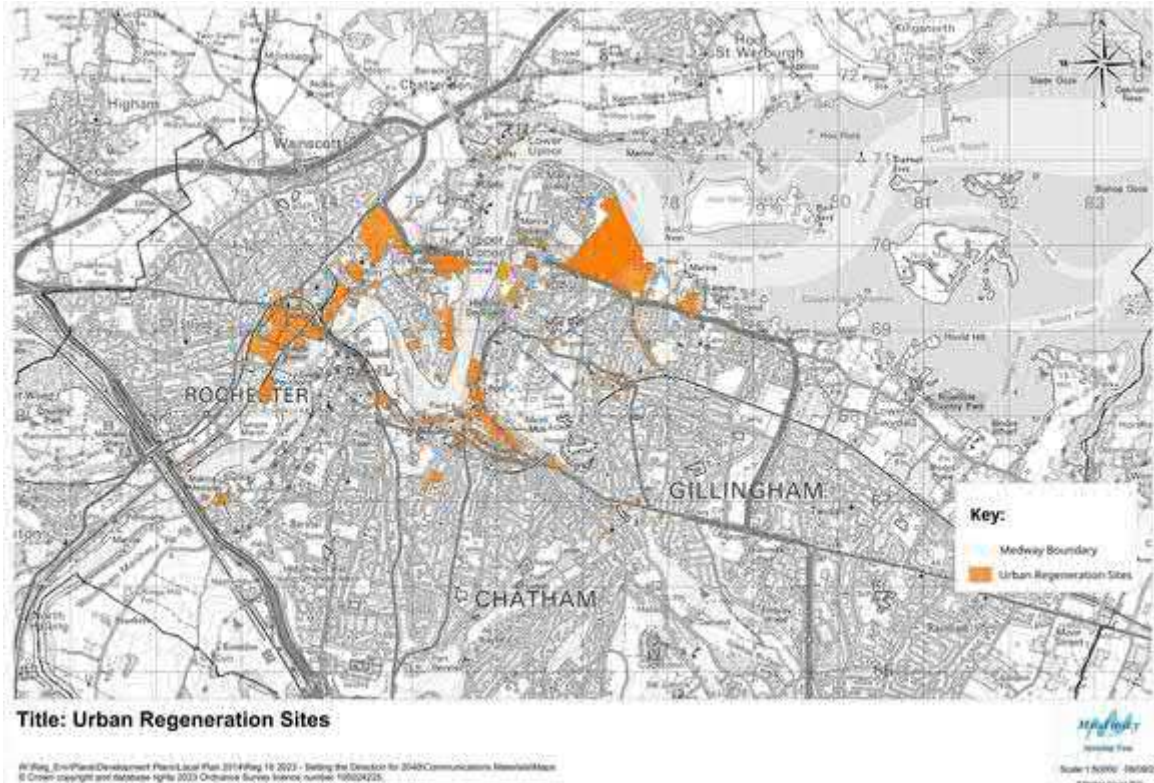
Read this blog, by our Chief Planning Officer, Dave Harris, to find out more about what the Local Plan means for Medway's future.

[Read here](#)

How Medway will grow

The council has identified four broad types of locations where development could potentially take place in Medway. We have gathered information from land owners, developers and our own work looking at regeneration opportunities.

In this edition, we'll take a closer look at locations 1 and 2.



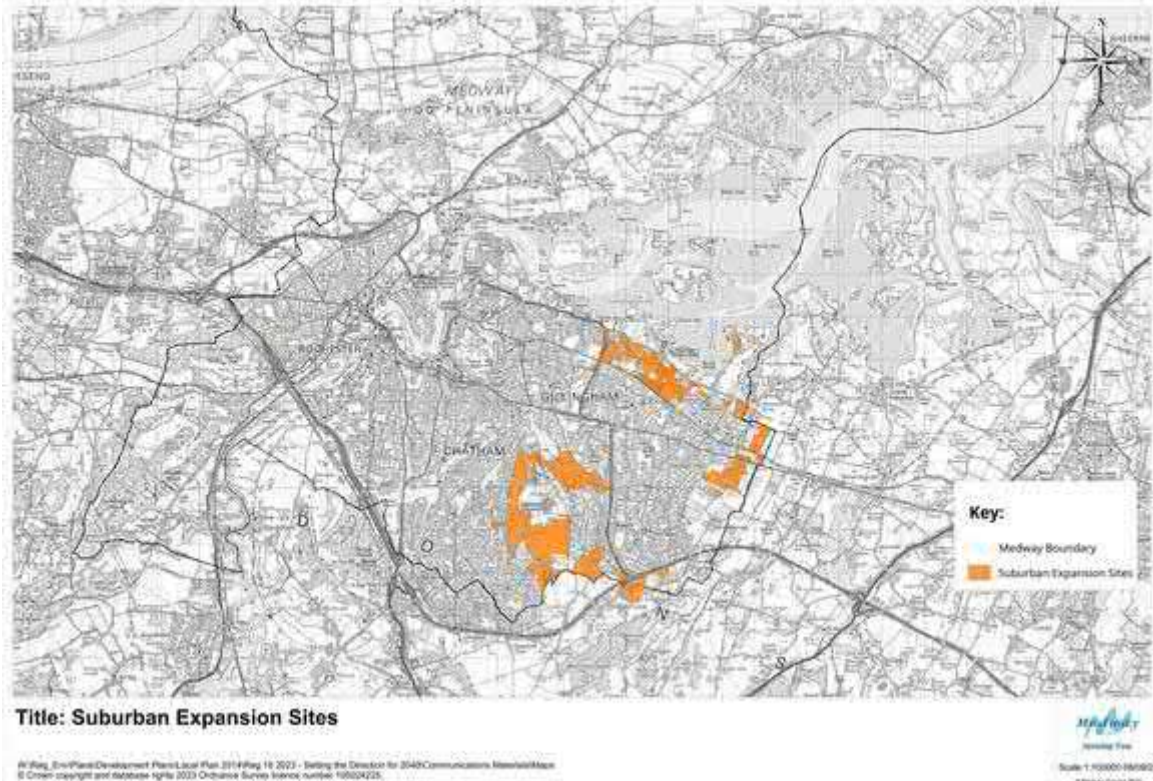
Location 1: Urban Regeneration

Medway has been successful in transforming its urban waterfront and centres in recent decades. We want to continue to promote urban regeneration as a key part of our growth plan. We have identified further potential sites for redevelopment. This could bring new homes and activities into our town centres.

Town centre regeneration is not limited to flats for younger people. It has the potential to meet the needs of older people and families. Vacant units on the high streets could also be redeveloped with space for businesses and community services on the ground floor, with new homes on higher floors.

There are also wider opportunities for redevelopment in areas such as Chatham Docks and Medway City Estate, which would involve the relocation of existing businesses.

[Download the Urban Regeneration sites map](#)



Location 2: Suburban Growth

This category considers the areas for potential growth adjoining the existing urban areas to the south and east of Medway. These are popular places to live and people value the parks and countryside around the suburbs. Developers are actively promoting land in this area through the Local Plan and planning applications.

Development of large sites in this location could provide opportunities to enhance local services and make it easier and more attractive for people to walk, cycle and use public transport.

There are issues to consider with transport links, air quality and the loss of productive farmland, and the impacts of development planned on Medway's borders.

[Download the Suburban Growth sites map](#)

Watch our Podcast video



Don't forget to check out our Local Plan podcast.

It features Cllr Simon Curry (Medway Council's Portfolio Holder for Climate Change and Regeneration) and Dave Harris (Chief Planning Officer).

The recording includes:

- An overview of the Local Plan process
- Our vision and priorities
- Your questions answered
- Details on our latest consultation and how to take part

[Watch here](#)



Stay in touch

Visit the website: medway.gov.uk/FutureMedway or email us at futuremedway@medway.gov.uk

For more details on Medway Council Planning, visit medway.gov.uk/Planning

You can also keep up-to-date on our regeneration programme via:

Website: medway.gov.uk/regeneration

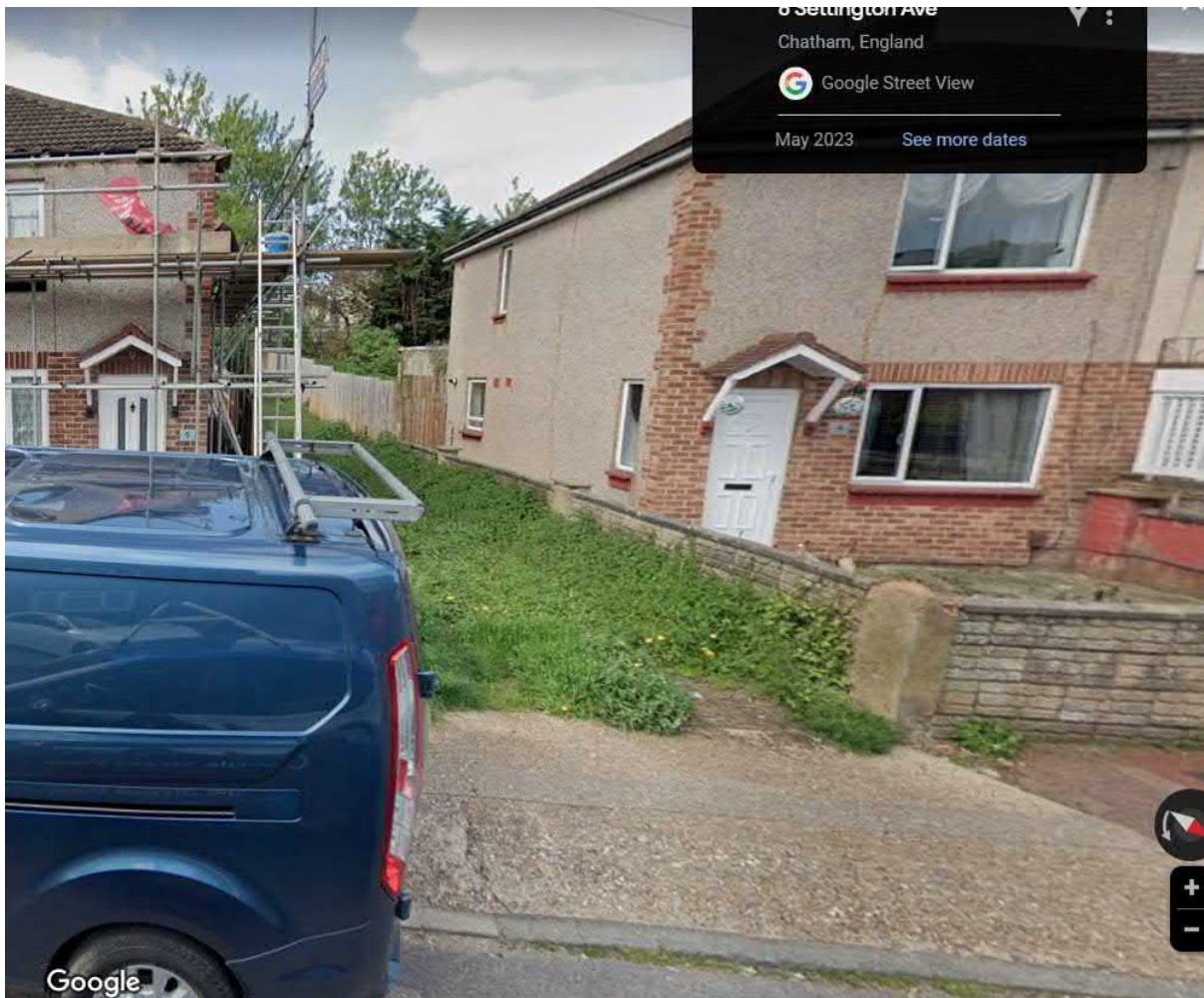
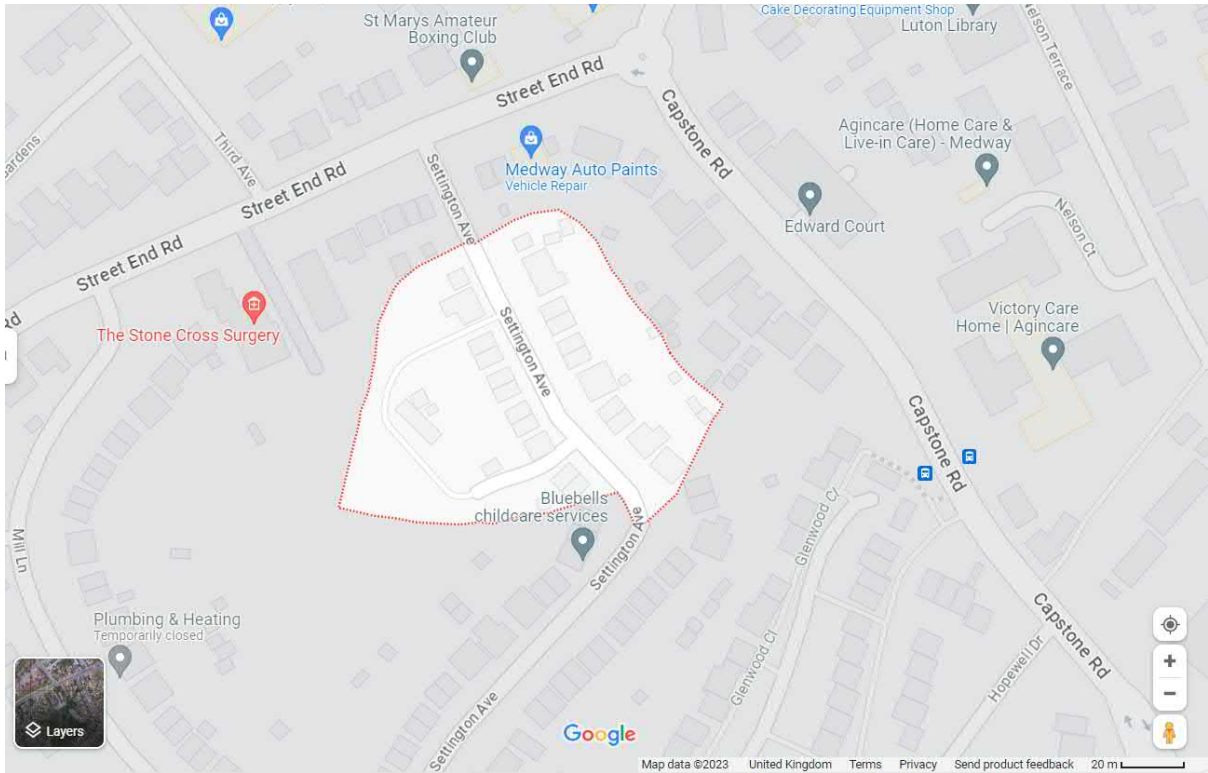
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recommendation for redevelopment of Garage Block R/O 6-18 Setington Ave ME5 OAH. Built in the 1950s the site is now in a state of disrepair, overgrown and barely used. Gates were erected at the top of both access roads due to illegal activity. We believe 10 were originally privately purchased, with the remaining 29 rented out currently by Caxtons who no longer provide any maintenance. Access could be gained via the disused Church in Street End Road.

Setting the Direction for Medway 2040

Questions

Vision

The proposed vision for Medway in 2040 is presented on pages 6 and 7 of the consultation document.

Q1. Do you have any comments about the proposed vision?

In the view of the City of Rochester Society, the proposed vision for the area fairly and reasonably represents the likely requirements of the Medway Towns in the period up to the year 2040. We have no significant issues to raise at this stage – over and above those which are set out in the consultation document.

Strategic Objectives

The proposed strategic objectives are listed below and presented in full on pages 8 to 10.

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

Q2. Do you have any comments about the proposed strategic objectives?

Our main concern is over the need to accommodate some 29,000 new homes in an area which is already under considerable pressure in terms of its infrastructure – schools, health facilities, transport, water supply, sewerage, gas, electricity, telecoms, etc. We consider it of paramount importance that the local plan prioritizes the expansion of these services and ensures that they are in place, or well-advanced, in line with the provision of the quota of new homes and therefore of the increase in population which will follow. In particular – as recent events have shown – our health facilities are under great strain already and, with the inevitable increase in population, would find it hard to cope with an emergency such as the recent pandemic.

We realise that, to a large extent, this is not only self-evident but also outside the direct control of the unitary authority. This, however, makes it all the more important that it is raised at every possible opportunity.

Developing a Spatial Strategy

Considerations in developing a spatial strategy are presented on pages 11 to 29.

Q3. Do you have any comments about the considerations in developing a spatial strategy? Please refer to the specific paragraph number (e.g. 5.1), figure, table or map.

The conservation of the historic environment of the Medway Towns, the protection of the character and features of the individual towns and communities, and the provision of adequate open space are issues about which we in the City of Rochester Society feel very strongly and are issues which can easily be overlooked in the drive for more housing, necessary though that may be. In the Medway Towns we are surrounded by a unique, yet fragile landscape which must be protected and enhanced if the wildlife which thrives in it is also to be protected and Medway is to play its part in responding to the climate emergency. Recent evidence of the council's approach to its open spaces (eg Temple Marsh in Strood) is to be applauded.

Land Availability Assessment

Medway Council has published an interim Land Availability Assessment.

Q4. Do you have any comments about the interim Land Availability Assessment?

The City of Rochester Society has no comments to offer about the council's Land Availability Assessment beyond what has been said above and in our letter of 27 October addressed to the Local Plan Team. Essentially, the availability of land for development, especially housing, must take account of the need to provide the infrastructure and services necessary for modern living in the twenty first century.

DICKENS' COUNTRY PROTECTION SOCIETY

REPRESENTATION IN RESPONSE TO THE CONSULTATION BY MEDWAY COUNCIL UNDER REGULATION 18 OF THE TOWN AND COUNTY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012.

General Background

The Society's primary interest is the preservation of the countryside. The Hoo Peninsula was identified in the former Kent Structure Plan as an Area of Special Significance for Agriculture and the area's importance for agriculture was also recognised in the original Medway Plan. The basis of land use planning is to manage an important asset. In order to do this the area is surveyed and the significant assets are identified and before land is allocated for development, the capacity of the available infrastructure and the need for any new infrastructure is assessed. Before sites are finally identified for development, the impact of that development needs to be assessed and any necessary adjustments need to be made.

The Society recognises that the Regulation 18 process is intended to give an opportunity to those with an interest in land to put forward land for development. The Society's primary objective is the preservation of the countryside. The Society therefore does not propose to comment on any of the sites put forward in the urban area.

Housing Land

The Society is concerned that the need for land for housing in the authority's area may have been over stated and this should be checked independently. There is a tendency towards exponential growth. The more that is provided, the more is expected, but the resource is progressively depleted.

The Society would refer to the map entitled 'Rural Development' showing land put forward for development on the Hoo Peninsula. In the interest of proper planning, the Society would compare this with the former Ministry of Agriculture - Provisional - Agricultural Land Classification Map of England and Wales - Sheet 127 [scale 1 inch to 1 mile]. The Society would draw attention to the fact that of the 24 sites identified, only 5 are not indicated as Grade 1 agricultural land.

Agricultural Land

The Society recognises Agricultural Land Classification Maps are provisional and qualified stating that specific sites should be re-surveyed. The Society is concerned, however, that when sites are re-surveyed there appears to be one outcome. Of the ten major planning applications lodged in Medway between 2016 and 2023 where agricultural land was proposed for development, an agricultural assessment was carried out. In five of these cases the land was indicated on the Agricultural Land Classification Map as Grade 1 and in all five cases the result of the survey was to significantly downgrade the land. In only one of the eight cases did the survey findings coincide with map grading and that was when the grade was Grade 3. In the other two cases the land was indicated on the map as Grade 2 and was downgraded. Three different consultants produced the survey reports. The common feature was that the surveys were all commissioned by the respective developers.

The site surveys have evaluated the land in absolute terms against the ministry criteria. Even if all the survey reports were objective, it remains the case that in comparative terms the Ministry's classification is likely to remain valid. If the sites identified on the rural development map are to be considered, there is a need for an objective assessment of their agricultural land quality. In the interest of the economy and food security, development should not take place on the nation's best agricultural land. Only 2.8% of the agricultural land in England and Wales is categorised as Grade 1 on the Ministry's maps.

Infrastructure

The level of infrastructure needed to support the level of development being envisaged is alarming in terms of water requirement, sewage disposal, medical and other services. The transport infrastructure is not adequate. The Four Elms junction, in particular, in its present configuration cannot support more development on the Hoo Peninsula

because of the traffic it will generate. The minimum requirement is for a grade separated junction. Failure to provide this will have serious consequences on the local economy because of the congestion that will be generated. It has not escaped the Society's notice that monies promised by central government have been withdrawn and this must have an impact on the authority's ability to support development.

General

The Society is concerned to ensure that individual settlements are not allowed to coalesce and that plans provide for villages to maintain their separate identity and urbanisation is kept to a minimum. There is currently a risk that Chattenden and Hoo St Werburgh will be allowed to merge.

October 2023

headley, andrew

From: [REDACTED]
Sent: 31 October 2023 15:29
To: futuremedway
Subject: Regulation 18 consultation response - Theatres Trust

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

Good Afternoon

There appears to be no means of entering comments on the online consultation portal so the brief comments of Theatres Trust on the current Regulation 18 consultation are set out below.

Remit:

Theatres Trust is the national advisory public body for theatres. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'.

Comment:

We are supportive of the proposed strategic objectives as these include a focus on cultural activities and supporting growth in cultural and creative industries.

We recommend inclusion of a policy within the plan which robustly protects existing cultural infrastructure in Medway from unnecessary loss, and promotes delivery of additional/improved provision including the utilisation of vacant and under-used land for arts, cultural and creative purposes. This will ensure conformity with paragraph 93 of the NPPF and that the cultural needs of local people are met and supported.

Kind regards,

[REDACTED]
[REDACTED]

Theatres Trust

22 Charing Cross Road, London WC2H 0QL

[REDACTED]

W theatrestrust.org.uk

31st October 2023

By email only: futuremedway@medway.gov.uk



Dear Madam/Sir,

RE: Regulation 18 Consultation on the Draft Medway Local Plan 2022-2040

Kent Wildlife Trust (KWT) welcomes the opportunity to comment on the draft Medway Local Plan 2022-2045. We have reviewed the documents online and have provided comments and recommendations below. To allow us to complete a comprehensive response to your consultation, please accept our comments in letter format.

It is noted that the current consultation does not detail policies or identify the sites preferred by the Council for new development. KWT welcome the opportunity to comment on these more detailed aspects of the draft Local Plan in the future. The consultation document does however discuss sites identified within the Land Availability Assessment (LAA) which has been published alongside the draft Local Plan consultation document. As the LAA has been introduced as part of the draft Local Plan consultation KWT has taken the opportunity to provide high level comments in this response letter on a selection of those sites.

Vison for Medway in 2040

It is noted that as part of the vision for Medway in 2040 the Council are aspiring to be responding and adapting to climate change. It is also noted that Medway aspire to have transitioned to a low carbon economy with a clear path mapped out to reaching net zero. These aspirations are encouraging but it is considered that the vision should be stronger with Medway committing to becoming carbon neutral within the lifetime of the plan or earlier. Such a commitment would be in line with other Council's in Kent. Medway Council have declared a climate emergency and while this is mentioned under the strategic objectives no reference has been made within the vision for Medway or how that declaration will be driving the draft Local Plan policies. To tackle the climate emergency and align with the Government's 2050 net zero target, we urge Medway Council to work with more ambition in becoming carbon neutral with the future draft Local Plan containing clear policies and principles that seek to reduce emissions and increase carbon sequestration.

The vision should include reference to nature-based solutions as a primary means of tackling the climate emergency. As well as enhancing climate resilience nature-based solutions can help address societal challenges, providing benefits for both human well-being and biodiversity.

The reference to a resilient green infrastructure network is welcomed however it is suggested that a resilient blue infrastructure network is also incorporated into the vision and that reference is made to the Medway Valley and the Medway and Thames estuaries as being valued landscapes which support a richness of biodiversity.

We urge the Council to also focus on green and blue infrastructure to deliver a wide range of ecosystem services, such as air quality, climate mitigation, soil erosion and carbon and nutrient cycling. The vision of delivering necessary infrastructure to provide a good quality of life for residents should also aim to improve environmental conditions to benefit both nature and people. An effective network of multi-functional green and blue infrastructure is key to promoting active travel, creating accessible vibrant towns, and tackling the nature and climate crisis.

The vision of Medway being a healthy place to live and work with inclusive access to the outdoors and to places where residents can grow their own food is welcome. Daily connection with nature is correlated to better health and wellbeing, reducing stress, improved concentration, and reductions in obesity. The provision of high-quality green infrastructure and easy, everyday access to nature should be at the heart of creating healthy communities.

KWT consider that reference to the working and safeguarding of mineral resources should be expanded to be clear that this will not be at the expense of the natural environment and that sites from which materials have been worked will be restored to benefit biodiversity and the green and blue infrastructure network.

Strategic Objectives

Prepared for a sustainable and green future:

The objective of ensuring Medway is prepared for a sustainable and green future is encouraging as are the aims to transition to zero carbon, reduce flooding and promote nature-based solutions. KWT urge the Council to set an ambitious target to achieve net zero during the life of the plan through, among other methods, carbon reduction targets and the offsetting of residual carbon emissions through habitat creation.

Tackling the climate emergency needs to be done in tandem with tackling the biodiversity crisis. These issues need to be a priority in the draft Local Plan, with a push to implement holistic and natural solutions which simultaneously deliver sustainable developments, flood risk reduction, human wellbeing, and biodiversity benefits. Future policies to help achieve this objective should require new development to be designed to achieve net zero construction and operational carbon emissions.

To support the objective, it is proposed to strengthen and develop transport networks for sustainable travel. An effective network of multi-functional green infrastructure is key to promoting active travel, creating accessible vibrant towns, and tackling the nature and climate crisis. Future policies to promote this objective should place greater emphasis on active and public transport, with the aim of reducing private vehicle usage to reduce emissions. A greater focus on increasing access to nature as part of the sustainable travel options would benefit this strategic objective and there are a multitude of health and wellbeing benefits of daily contact with nature which are discussed under a separate objective below.

The aim to secure a robust green and blue infrastructure network and provide resilience for nature through better connectivity and conditions is welcome. This should involve the creation of a coherent ecological network which promotes the enhancement and connectivity of habitats. Strategic planning of Local Nature Recovery Strategies will be fundamental to informing development and biodiversity net gain delivery and thus should underpin this objective.

Alongside the aim to provide for the supply of minerals should be the commitment to promote other sustainable options so that destructive quarrying and mineral extraction is avoided, and the circular economy encouraged. KWT suggest that policies in the draft Local Plan require sites exploited for the mineral resources to be restored and regenerated to benefit biodiversity and the green and blue infrastructure network.

KWT is currently working as part of the Kent Nature Partnership (KNP). The KNP is developing a countywide strategic approach to Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies, in anticipation of the requirements of the Environment Bill. As part of these strategies, we are

promoting a countywide commitment to delivering 20% measurable biodiversity net gain and commitments that any offsite biodiversity net gain is delivered strategically in order to meet the priorities and targets of existing and future landscape scale biodiversity strategies. In aligning with these principles, a BNG policy should:

1. Specify a minimum percentage, preferably 20%, but a minimum of 10% in accordance with future legislation.
2. Provide detail on how this percentage should be measured, using the most up to date version of the Defra Biodiversity Metric.
3. Specify how developers should present their calculations and details of how on and offsite compensation and net gain will be delivered.
4. Require that on and offsite net gain should be delivered at locations that meet strategic landscape scale priorities, including specific reference to future Local Nature Recovery Strategies.
5. Specify that BNG provision should follow the mitigation hierarchy, providing offsite compensation where avoidance, mitigation and onsite compensation are not feasible or ecologically meaningful.
6. Specify that offsite BNG should be provided if it cannot be meaningfully provided onsite in a way that contributes to meeting local landscape scale biodiversity priorities.
7. Commit to providing, managing, and monitoring net gains for biodiversity for a period of 30 years.

The inclusion of a policy requiring 20% net gain would be consistent with the approach being taken by other Local Authorities currently undertaking Local Plan reviews in Kent and indeed with Districts across England. We would be happy to enter into further discussions with Medway Council to support the development of the Biodiversity Net Gain policy.

Supporting people to lead healthy lives and strengthening our communities:

KWT support the aim to reduce inequalities in health and deliver better outcomes for residents, by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public realm design.

A recent report¹ shows that nature-based health and wellbeing programmes could save hundreds of millions of pounds each year and reduce society's reliance on the NHS. The report has found that 'green prescribing' as an evidence-based pillar of social prescribing harnesses the health, well-being, and social benefits of spending time in nature. It enables GPs and other health care practitioners to refer people to nature-based programs to improve physical and mental health. On this basis, conservation, and promotion of access to nature should be a core objective that informs policies within the draft Local Plan. We also recommend that the Council explore social prescribing of nature-based interventions with healthcare providers.

A lack of high-quality nature limits the benefits for residents in terms of wellbeing, particularly in urban areas where biodiversity loss is more apparent. Studies have shown that plant and bird species richness and habitat diversity are all related to improved wellbeing and lower levels of depression, anxiety, and stress. Therefore, Medway Council should set ambitious targets to halt the decline of species and habitats through the life of the Local Plan. The draft Local Plan should prioritise biodiversity richness in existing urban areas as well as in new developments, to bring the wellbeing benefits of nature to all communities.

¹ [A Natural Health Service – Improving lives and saving money](#)

Securing jobs and developing skills for a competitive economy:

To meet the objective of securing jobs and developing skills for a competitive economy it is proposed to support local businesses to grow through the provision of good quality employment land. The allocation and provision of employment land should not be at the expense of the natural environment. Any allocations for employment use should avoid sensitive locations such as designated and non-designated nature conservation sites. Where employment sites will adjoin sites which are of biodiversity value then large, graded buffer zones should be provided. Policies within the draft Local Plan should require future employment sites, and the redevelopment of existing employment sites, to prioritise biodiversity. In the interests of the health and wellbeing of those who will work at these employment sites it is also recommended that access to an outside green space is provided for employees to take their breaks.

The aim to support growth in green tourism should be coupled with the support of conservation businesses / charities and 'green' industries in Medway. A draft Local Plan which supports this objective, and its aim of growing green tourism, must also provide greater protection to the natural environment, including sites which support habitats and species, otherwise it will not be possible for green tourism businesses to become established.

Boost pride in Medway through quality and resilient development:

It is encouraging to see that a key aim in achieving the above objective is to provide sustainable development in a way that respects the natural environment and to direct growth to locations that enhance Medway's environmental characteristics.

KWT note that the Council are focusing on making the best use of brownfield land for development. Brownfield sites are generally preferred for development over greenfield sites as they are typically areas of land that have been previously developed and are therefore expected to have lower biodiversity value compared to greenfield sites. However, the term brownfield also encompasses quarries, chalk, and gravel pits, which often give rise to valuable mosaic habitats, rich in biodiversity. The distinction between brownfield sites of low ecological value and wildlife rich brownfield sites that support areas of Open Mosaic Habitat on Previously Developed Land, which is recognised as Priority Habitat under Section 41 of the Natural Environment and Rural Communities Act (2006) and protected under the National Planning Policy Framework (2023) should be clearly set out within future policies of the draft Local Plan.

Therefore, KWT ask the Council to provide more detailed clarification on the term brownfield within any future policies in the draft Local Plan. There should be a clear distinction between brownfield sites dominated by hardstanding which offer no/low biodiversity value, compared to brownfield sites which provide an essential resource for a range of wildlife within the wider landscape. When drafting policies on this topic it is advised that the Council guarantee that the allocation of brownfield sites is informed by data on biodiversity value, so that sites of high value aren't prioritised for development. The Council should ensure that an adequate assessment of brownfield biodiversity (including full ecological surveys) is provided as part of any future planning applications. The value of brownfield sites should also consider the wider ecological networks and the contribution they make to the provision of ecosystem services. Brownfield sites of high ecological value should be considered for different re-use options, such as restoring to greenspace, and be protected through planning policy, or where appropriate, statutory designation.

It is encouraging to see that, in seeking to achieve the above objective, there is an aim to lift the standards of sustainability and quality in all new development as well as a drive to seek opportunities

for greener construction. KWT wish to refer the Council to the Building with Nature Standards, the UK's first green infrastructure benchmark. These standards provide a shared framework of principles for delivering high quality green infrastructure and an opportunity for the accreditation of developments through the scheme. The Standards can be adopted by local authorities as a benchmark for assessing and accrediting the quality of development. Accreditation of a development by Building with Nature can greatly reduce planning uncertainty, help to engage local communities, and greatly increase the quality of developments. In addition, Building with Nature is also being used by planning authorities to develop and test new planning policies. Both strategic planning and development management teams can benefit from using the Building with Nature Standards and Accreditation system, and KWT would be happy to work with you in investigating how this can help to support the delivery of the policies set out through this Plan.

Developing a Spatial Strategy

It is noted that, at this stage, a policies map with the proposed site allocations for the plan period has not been published. It is also noted that the LAA which contains all the sites currently being considered by the Council for allocation in the draft Local Plan has been published. As the LAA has been introduced as part of the draft Local Plan consultation KWT wish to provide high level comments on a selection of the sites identified.

It is concerning to see that a number of sites identified within the LAA adjoin, and often encroach on, land which is designated as Special Protection Areas (SPA), Ramsar, Sites of Special Scientific Interest (SSSI), Marine Conservation Zones (MCZ), and Local Nature Reserves (LNR). Many of the sites also encroach on, contain, and / or adjoin priority habitats, ancient woodland, and Local Wildlife Sites (LWS).

Of particular concern is the amount of land indicated as being potentially suitable for development around Chattenden Woods and Lodge Hill SSSI; Tower Hill to Cockham Wood SSSI; Northward Hill SSSI; High Halstow NNR; Northward Hill RSPB reserve; Medway Estuary and Marshes SSSI, SPA, Ramsar; Medway Estuary MCZ; and NOR Marsh and Motney Hill RSBP reserve (for example sites HHH1-HHH39, SR14, SR16, SR18, SR22, SR24, SR41, and RN26).

Taking into account the areas of land identified for potential development there are serious concerns about the negative impacts that will occur as a result of habitat loss, increased recreational disturbance, cat predation and detrimental disturbance arising from noise and light pollution. In respect of sites identified further to the north-east of the Hoo Peninsula there would also be impacts from the infrastructure works necessary to accommodate large numbers of additional homes or employment sites (for example sites AS21-AS28).

Where land identified as being potentially suitable for development adjoins sites which are particularly sensitive to the impacts of development, such as the Chattenden Woods and Lodge Hill SSSI, it is recommended that policies are included as part of the future draft Local Plan which require a minimum 400m graded buffer zone. A buffer zone of this size will work towards reducing disturbance to protected habitats and species from some of development related issues listed above.

The only use of the term "biodiversity" in the consultation document is in connection to issues and constraints for rural development. Given the development of Local Nature Recovery Strategies and the government's commitment to nature's recovery (30% of land and sea protected by 2030) protected sites, priority habitats and protected and priority species should be a common theme throughout the entire spatial strategy. The Council should view these, and biodiversity in general, as a key opportunity for Medway rather than a constraint.

We hope that the comments made within this letter prove useful in the formation of the Medway draft Local Plan. We would be more than happy to hold further discussion with you on any of these issues raised.

Yours sincerely,

[REDACTED]

[REDACTED]

Kent Wildlife Trust

[REDACTED]

Introduction

- 1.0 The LAF acknowledges that the position of the local planning authority has returned to the Reg 18, call for sites stage of the LP process to reset the dialogue with the public, provide an opportunity to new or historic landowners to promote land across Medway and for the public to provide initial comments on the proposals.
- 2.0 Previous comments were supplied by the LAF group back in 2018 which have been attached.

Context

- 3.0 The context of the Reg 18 consultation highlights the importance of the greenspaces (2.2) and how the population of Medway become less reliance on private owned vehicles and move around using non-motorised vehicles (2.6). This validates the importance of all types of public rights of way to provide connectivity through new and existing neighbourhoods.
- 4.0 Capitalising on the transport networks and links to London to boost the local economy is welcomed, however the documents do not seem to give sufficient weight to the advantages of tourism to Medway's economy and Rochester in particular. Attracting tourists boosts the local economy and provides jobs. There is barely any mention of issues around tourism in the consultation document and nothing seen about the advantages to the local economy. It is sensed that tourists are already bypassing Medway with, for example, reduced facilities for coach parking.
- 5.0 The loss of HIF again is acknowledge meaning some identified opportunities will not be coming forward but considered in the new plan.
- 6.0 The LAF group are keen to see any opportunity for improved or upgraded public rights of way considered and delivered if the appropriate funding can be secured.

The Vision

- 7.0 The Vision says all the right things, but how achievable are they? Riverside walks, often linear routes, starting and ending in different places. This is great if you have a destination to get to, however circular walks that links the river and heritage sites should be promoted, with relevant information available. Medway's farms that produce quality food and drink may have been lost to housing needs by this time.

Strategic Objectives

- 8.0 There is lack of mention around creating new Public Rights of Way. Walking and cycling is nearly always considered as part of active travel however the higher rights of PROWs are nearly never mentioned, equestrians have been poorly served to date. If byways and restricted byways are provided then horse riders, horse drivers, cyclist, and pedestrians will have the ability to reach destinations, including services, school, and employment, away from the highways. These should be considered with any land parcel coming forward as they require a minimum of a 3m width.
- 9.0 7% of the population of South East England riding or driving horses; using Medway's population figures, this means that with the increase in housing and people and that will be increasing at a huge rate with all the developments in Medway will want to ride or drive horses. There is a huge

need for equestrian facilities in Medway, for the current and future population of Medway.

- 10.0 A range of evidence indicates the vast majority (90% plus) of horse riders are female and more than a third (37%) of the female riders of respondents were above 45 years of age. Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages. This needs to be considered as part of the healthy lives and communities.

Developing a Spatial Strategy

- 11.0 As the spatial strategy is high level and comprehensive evidence is needed to inform the new plan, the LAF group will await this information before being able to supply specific feedback and opportunities. However, every chance should be made to protect any green belt corridors from housing and industry.
- 12.0 Planners should ensure that space is allocated within developments for Riding Schools and Livery Yards (where private individual people keep their horses), to encourage people of all ages and abilities into this very healthy sport, contributing to both physical and mental, and also puts millions into the local rural economy.

Conclusion

- 13.0 The consultation for Reg 18 2023 is such a high level, until more detailed work is carried out and sites formally allocated all we can do is reiterate the importance of not only foot and cycle paths but creating all types of public rights of way to more extensive, coherent network of off-road paths to all users. To ensure there is connectivity and routes that lead to popular destinations, which are more attractive than using a motor vehicle while establishing wildlife corridors and protecting any green belt corridors from housing and industry.
- 14.0 Kent boasts of an extensive Public Rights of Way (PROW) network, with the greatest county mileage in the country. The Medway rights of way network was inherited from KCC when the Unitary Authority came into being, and the proportion of footpaths to routes with higher status are similar across both authorities, although the Medway statistics show even less routes available to horse riders, carriage drivers and cyclists than in the KCC area.
- 15.0 PROWs are undergoing a review to restore the record. This could affect land parcels which are currently clear of any known and recorded PROWs. The cut off date for the works is currently 1st January 2026 however could be extended for a further 5 years. If all unrecorded PROWs, including those in the excluded area are registered before the cutoff date this would contribute to creating connections and have the protection as recorded PROW's.
- 16.0 The engagement with school to encourage all schools to link up with local environmentalists, to take students around our countryside. It is so important that our youths are in a position to appreciate and support protection of our fabulous assets. This can be a continuation of any forest school activity.

17.0 Lastly, reward and encourage those farmers who are actively maintaining access through their land, via good signage and regular reinstatement of ploughed fields and infilling of rutted paths.

We would like to thank you for your consideration, and I hope that you will take note of the many points raised in our letter.

DRAFT

headley, andrew

From: Michael Atkins [REDACTED]
Sent: 31 October 2023 14:48
To: futuremedway
Subject: Port of London Authority response: Medway Local Plan 2040 Regulation 18 consultation

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

Dear Team

Thank you for consulting the Port of London Authority (PLA) on the above-mentioned regulation 18 consultation for the Medway Local Plan 2040. For information, the PLA is the Statutory Harbour Authority for the Tidal Thames, which in the Medway context covers the area from Cliffe pools to Yantlett Creek within the Thames Estuary. Peel Ports are the harbour authority for the River Medway itself and parts of the Thames Estuary, including at Grain and Sheerness. The PLA's statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movement's within its jurisdiction and its consent is required for the carrying out of all works and dredging within its area. The PLA's functions also include for the promotion of the use of the River Thames as an important strategic transport corridor. In addition the PLA also operates a radar navigational tower at Allhallows, which forms is part of a network of 15 radars overseeing the River and estuary which helps to provide a full picture of all shipping movements to and from the river and the outer estuary. I have now had the opportunity to review consultation documents and have the following comments to make.

Within the Local Plan, there must continue to be support for the safeguarding of wharfage within the borough, particularly the facility at Cliffe, which is within the PLA's navigational jurisdiction, as reflected in the previous Medway Draft Development Strategy (2018). Related to this, under the Rural Development sites document, it is noted that there is identified site located in close proximity to the existing wharf operations at Cliffe. To confirm any future proposed development at this site must give close consideration to the Agent of Change principle included in paragraph 187 of the National Planning Policy Framework (NPPF) (2021) which states that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established, and where the operation of an existing business or facility could have a significant adverse effect on new development in its vicinity, the applicant should to provide suitable mitigation to address these matters. This must be referenced within the Local Plan.

The PLA in principle support the references to the proposals for continuous riverside paths that can provide attractive and healthy connections, and act as a draw for visitors and residents. As part of this with regard to any development proposals alongside riverside areas, the Local Plan must include reference to the vital need to provide riparian life saving equipment (such as grab chains, access ladders and life buoys) along the riverside, to a standard as recommended by the PLA's 'A Safer Riverside' guidance for development on and alongside the Tidal Thames (<http://pla.co.uk/Safety/Water-Safety/Water-Safety>). This would be relevant for all parts of Medway's' waterways not just the Tidal Thames. The PLA also considers that there is need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) to be provided as part of new development along the riverside. This would be in line with the Tidal Thames Water Safety Forum (which includes the PLA, RNLI and emergency services.) Drowning Prevention Strategy (2019). It is considered that reference to this essential infrastructure must be included within the policy wording as part of Local Plan.

Elsewhere within the Regulation 18 'setting the Direction for Medway 2040' document, the PLA in principle supports the reference to new opportunities for river transport and would be open to take part in any discussions with regard to this on any proposals within the PLA's area of navigational jurisdiction.

I hope these comments are of assistance.

Regards

Michael

Michael Atkins
Senior Planning Officer

Port of London Authority

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Medway Local Plan

Regulation 18 consultation Setting the Direction for Medway 2040

Response on behalf of the Hoo Consortium

31 October 2023

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1 INTRODUCTION

1 INTRODUCTION

- 1.1. These representations are submitted on behalf of the “Hoo Consortium”, in response to Medway Council’s Local Plan Regulation 18 consultation – Setting the Direction for Medway 2040 (hereafter referred to as the “Consultation Document”). The Consortium comprises:
- The Church Commissioners for England
 - Dean Lewis Estates
 - Gladman Developments Ltd
 - Redrow
 - Taylor Wimpey
- 1.2. The Consortium has been working closely with Medway Council over the past 6-7 years to achieve its ambitious vision and growth aspirations for the Hoo Peninsula over the next 30 years. This includes seeking to secure the major growth opportunities around Hoo St Werburgh, High Halstow and Chattenden. The Consortium acknowledge and supports the preparation of a new Local Plan by Medway Council and welcomes the opportunity to respond to the consultation.
- 1.3. The Consortium owns/controls land extending to over 1,500 acres, which is able to accommodate 8,000-10,000 new homes and new employment opportunities, alongside the accompanying schools, retail, community health, sports and leisure facilities, strategic highway and sustainable transport infrastructure. This would be complemented by major areas of strategic green space including community parkland, strategic environmental mitigation and biodiversity net gain.
- 1.4. Notwithstanding specific land interests, these representations have been prepared in objective terms and against the prevailing planning policy framework – in particular, the Government’s guidance set out in the National Planning Policy Framework (NPPF) (September 2023) and Planning Practice Guidance (NPPG) (March 2014 and as updated).
- 1.5. We welcome the Council’s commitment to this plan-making process and the ambition it has to move forward towards submission of the Local Plan in accordance with its adopted Local Development Scheme of October 2022.
- 1.6. We are keen to continue working with the Council to ensure past failures in Plan-making are fully addressed and enable delivery of a “Sound” Local Plan which achieves the housing, employment, social and physical infrastructure needs of the District in full.
- 1.7. As the first stage in this Plan-making process we have sought to provide commentary to assist the Council in refining its emerging strategy such that a sustainable strategy is progressed which maximises the opportunities available across the District, including the significant opportunities on the Hoo Peninsula.



2 RESPONSE TO REGULATION 18 CONSULTATION

i) Vision and Strategic Objectives

- 2.1. The Consultation Document ('Setting the Direction for Medway 2040') proposes a bold vision for the future of Medway, looking to firmly establish the District as a regional leader in terms of its economy and quality of life through delivery of a people-centred plan.
- 2.2. We endorse this vision and believe it can be supported through the adoption of a Local Plan which meets growth needs, including housing, employment and community needs, in full, alongside the delivery of the required infrastructure to support this.
- 2.3. Key to this will be the delivery of new communities of a critical mass to support the daily needs of residents and address the needs of the Plan.
- 2.4. Delivery on the Peninsula is the best opportunity the Council has of achieving this through coordinated and comprehensive development which delivers significant new homes, including affordable housing, new employment opportunities and strategic green space including community parkland, strategic environmental mitigation and biodiversity net gain. This would be supported by provision of new education facilities, retail, community and health provision, sports and leisure facilities and strategic highway and sustainable transport infrastructure.
- 2.5. We recommend the Council reviews and updates the Hoo Development Framework as part of this Plan-making process to present a longer term vision for the Peninsula that looks further ahead than the Plan period. This would form an important part of the Evidence Base and ensure the requirements of the NPPF (para 22) are achieved:

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. Where larger-scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

- 2.6. As a minimum and in the light of the above guidance, we recommend that:
 - The Local Plan should plan for and look forward to at least 2041/42, in order to provide for a minimum period of 15-years post Adoption; and
 - The Hoo Development Framework (perhaps as a "sister document" supported by sufficient policy 'hooks' within the Local Plan) should take an even longer term view.
- 2.7. In recommending the above, we are conscious of the present challenges of our political and planning systems in taking the "longer term view", but we genuinely consider that adopting a longer term spatial approach provides the best opportunity to deliver and secure the comprehensive sustainable objectives and Vision for Hoo (and Medway as a whole).



2 RESPONSE TO REGULATION 18 CONSULTATION

2.8. The Consortium supports the Council's vision for the Peninsula, and comments further on this in the next section (Section 3). We are very conscious that spatial planning is not “just about housing”, and alongside the strategic employment opportunities of the Peninsula (Kingsnorth and Grain) there is a genuine opportunity to create a more self-contained community, providing for day-to-day needs where people live and work, and supporting the strategic objectives of the Plan including:

- Delivery of a climate resilient new community which delivers high quality energy efficient development with low carbon energy, resource efficiency and sustainability embedded within the proposal;
- Strengthening transport networks, creating effective choices for sustainable travel and improving air quality including. enabling residents on the Peninsula to have new choices in how they go about their daily lives through provision of day-to-day services, facilities and employment opportunities within walking, cycling and regular public transport routes from where they live;
- Provide significant new opportunities for improvements to physical and mental health of residents through creation of a cohesive and comprehensive network of green infrastructure, public realm, recreational facilities and local services;
- Delivery of much needed new homes, meeting a significant portion of the Council's housing need over the Plan-period, including provision of affordable homes of all types and tenures, and homes that genuinely meet the varying housing needs arising in the District; and
- Securing a quantum of growth necessary to deliver good quality effective infrastructure in a timely manner to achieve sustainable development across the District.

2.9. We consider the Council has scoped the key issues and opportunities correctly and set the vision and strategic objectives accordingly. As set out above, we believe development in the right places can address these and help improve the quality of life for existing and future residents of the District.

ii) Housing Needs

2.10. We welcome the Council's recognition¹ that there is a housing crisis, particularly regarding affordability and “there is an absolute need to provide the right homes in the right places to meet Medway's growing needs and the requirements for those desperately needing good quality homes”.

¹ Para 5.4



2 RESPONSE TO REGULATION 18 CONSULTATION

- 2.11. This is readily apparent, not just through the lack of successful plan-making in the last 20 years, but through²:
- Poor performance against Housing Delivery Test, with only 69% of the homes required having been delivered in the preceding 3-year period;
 - Extremely limited forward housing supply within an identified supply of 6,322 homes in the period 2022/23 – 2026/27³, equating to an undersupply of 2,013 homes in that period, and an identified supply of only 1,589 homes in the 10-years following (2027-28 to 2037/38);
 - Medway being ranked in the 30% most deprived local authorities nationally in the 2019 Indices of Deprivation (up from 37% most deprived in 2015) and having fourteen neighbourhoods ranked in the 10% most deprived and thirty-seven neighbourhoods in the 20% most deprived nationally; and
 - Poor delivery of affordable housing in recent years, i.e. only 192 affordable completions in 2021/22 (equating to only 17% of all completions).
- 2.12. Despite this, we are concerned that the Council is questioning the use of the Standard Method and the demographic projections which underpin this (@ para 5.3 – 5.5) notwithstanding the clear intention of the Standard Method in seeking to address suppressed household growth which has occurred in areas such as Medway and the need to deliver a 'step change' in housing delivery to address known needs.
- 2.13. Whilst the Government has stated it is reviewing its approach to calculating housing needs, there is no indication for how this will be assessed and it will, likely, lead to a need for the emerging Plan to deliver a significant uplift in housing delivery. Nevertheless, any Plan should be prepared in the context of current guidance rather than speculating what guidance may or may not state in the future.
- 2.14. We consider it important the Council continues to proceed with an approach which meets known needs, including addressing issues of deprivation and housing needs. A genuine attempt to regenerate the District should be made which not only looks to provide houses in places where these are needed, but also looks to drive investment in the local economy through job creation and training opportunities.
- 2.15. The emerging evidence base should ensure it reflects this and tests the full Standard Method requirement, plus buffer, as well as other reasonable alternatives, which could include additional housing to drive economic growth.
- 2.16. Whilst the resulting housing need would be "*greatly higher than rates of housebuilding seen in Medway for over 30 years*" (@ para 5.3), it is important to recognise that the majority of the past 30 years has been in the context of the Council not having an up-to-date Local Plan.

² Medway Council Annual Monitoring Report, 2022

³ Much of which were anticipated to be coming forward on the Peninsula and do not yet have consent or the subject of any Application



2 RESPONSE TO REGULATION 18 CONSULTATION

- 2.17. Most growth in at least the last 20 years has been unplanned. Market sentiment exists to deliver the level of homes needed over the Plan period, evident by the significant potential housing capacity from the Council's Land Availability Assessment (@ Table 1).
- 2.18. The Consultation Document references a "Medway Housing and Demographics" report (April 2021) which identifies different demographic growth scenarios. It is unclear if this document is part of the Evidence Base (it does not currently appear to be) and if it remains up-to-date. We do not consider there any basis, at this time, to apply any of the alternative demographic growth scenarios identified in this document.
- 2.19. As a formal request has been made by Gravesham Borough to help meet its unmet housing needs (2,000 homes as acknowledged @ para 5.11), the option of accommodating this should be tested through the evidence base to understand if this is achievable within the opportunities and constraints of the District.
- 2.20. Over the 17-year Plan period (2022/2023 – 2039/2040) the Consultation Document identifies a housing need of 28,339 homes (1,667dpa). Para 5.12 identifies that allowing for a buffer to reflect that some sites may not come forward for development would increase the requirement for the Plan to 29,000 homes (2.3% buffer).
- 2.21. As highlighted above, the NPPF (para 22) requires spatial strategic policies to look ahead over a minimum 15-year period from adoption. The Council is seeking to have the new Local Plan in place by Autumn 2025. Whilst the intention of this is welcomed, and based on our experience of such things, even if the Plan is published and submitted by mid-2024, formal adoption in 2025 is unlikely. To reduce the risk of Para 22 not being complied with by the draft and submission versions of the Local Plan, we recommend the Plan period be extended to at least 2041/42.
- 2.22. In addition to this, a further 10% buffer on housing needs should be provided as a minimum, consistent with the NPPF (para 74), reflecting on past delivery rates and the necessary step-change needed to deliver the growth requirements of the Plan. The 2.3% buffer currently applied is too low and risks housing needs not being achieved in full.
- 2.23. On this basis, we consider it appropriate for the Plan to at least test the scenarios of:
- (1) Meeting housing needs in full, across a 18-year Plan period (2023 – 2041), applying a 10% buffer = circa. 33,000 homes (1,667dpa x 18 years + 10% buffer); and
 - (2) Meeting housing needs in full, across a 18-year Plan period (2023 – 2041), applying a 10% buffer + accommodating 2,000 homes from Gravesham's unmet need = circa. 35,000 homes (1,667dpa x 18 years + 10% buffer + 2,000 homes).

iii) Existing Components of Supply

- 2.24. Para 5.13 and Figure 2 identify an existing 'pipeline' of sites of 7,538 homes, not yet built, alongside a proposed windfall allowance of 3,000 homes (circa. 250 windfall dwellings per annum assuming no windfall provision for the first 5-years). Accounting for this, there is a residual requirement of circa. 19,200 homes to meet the Council's identified needs for



2 RESPONSE TO REGULATION 18 CONSULTATION

Medway. This would increase to circa. 22,500 homes or 24,500 homes in the circumstances as recommended above.

- 2.25. The Annual Monitoring Report 2022, published December 2022, identifies a pipeline supply of circa. 7,900 homes. The majority of these (circa. 6,300 homes) are anticipated to be delivered in the next 5-years which further emphasises the need to successfully adopt a Local Plan that allocates sufficient deliverable sites for housing.
- 2.26. Whilst a proportion of the pipeline is already under construction and/or subject to detailed (“full”) consent, there remains a number of sites with only Outline consent totalling circa. 2,400 homes, i.e. 30% of the identified supply.
- 2.27. The Council will need to be confident that this element of supply remains “deliverable” and is likely to contribute towards meeting housing needs over the Plan period. If not, it should not form part of the identified supply.
- 2.28. In addition, the Council should apply a sensible lapse rate. It is not clear if the Council has considered this, with no mention of a lapse within the Consultation Document or the latest AMR.
- 2.29. In respect of windfall provision, we consider the current allowance of 3,000 dwellings is too high. Assuming no windfall provision in the first 5-years of the Plan period, this would equate to 250 dwellings per annum over the remaining 12 years of the Plan period.
- 2.30. Whilst 250dpa is broadly consistent with the figure applied in the latest AMR (254dpa) this has to be seen in the context of the absence of an up-to-date Plan for the last 20 years. The majority of development since that time has been ‘windfall’ i.e. not identified through a Plan-making process. The Council should not therefore rely on data from this period to justify a forward-looking windfall provision, and we therefore object to a windfall allowance of 250dpa.
- 2.31. The Council is now looking to resolve this through adoption of this emerging Plan. This should identify suitable sites for allocation and enable a plan-led system to address growth needs in Medway. An overreliance on windfall when the opportunities exist to allocate such sites undermines this system.
- 2.32. We recommend the Council looks to meet its requirements in full through allocation of suitable development sites, reducing or removing any reliance on windfall. Should windfall provision come forward, e.g. on suitable sites within urban areas or in line with other policies of the emerging Plan, this should be considered “additional” to the minimum requirements of the Standard Method.

iv) The Spatial Strategy

- 2.33. The Consultation Document (Section 5) sets out potential approaches to meeting housing and employment needs across the District in the proposed Plan period, seeking to develop a Spatial Strategy for the emerging Plan.



2 RESPONSE TO REGULATION 18 CONSULTATION

- 2.34. 4no. broad categories of location have been identified reflecting Medway's geography and indicative capacities (based on the Land Availability Assessment) accompanying each:
- Urban regeneration – 11,151 homes;
 - Suburban expansion – 9,680 homes;
 - Rural development – 14,736 homes; and
 - Green Belt – 2,649 homes.
- 2.35. Each locational category comes with its own opportunities and challenges. Albeit some clearly preferable to others, as reflected below.
- 2.36. Given the scale of growth needs across the District, it is likely the final strategy will be a combination of approaches but with a significant focus on urban regeneration and rural development on the Hoo Peninsula.
- 2.37. Urban regeneration is supported and should form an element of the emerging Plan. There are great opportunities for regeneration across the urban areas of Medway which can assist in addressing some of the identified issues currently being experienced, including deprivation, providing homes and affordable homes, and supporting high streets.
- 2.38. However, there is no one-size-fits-all strategy that will work across the Medway towns which each have their own unique characteristics, issues and constraints.
- 2.39. We consider the Consultation Document correctly identifies the key constraints (para 5.24 – 5.28) which need to be considered in further detail through the Evidence Base. This includes a reflection (@ para 5.26) that urban regeneration sites may not be as viable as greenfield sites, however there should also be a reflection / assessment of the knock-on effect this could have on affordable housing delivery (which is not currently identified).
- 2.40. Further, there should be a reflection that urban regeneration / brownfield sites will often deliver slower than greenfield sites, often due to abnormal costs as well as need for demolition and remediation. Lichfield's "Start to Finish" (Second Edition, February 2020 – Appendix A) found that brownfield sites generally build-out a third slower than greenfield sites.
- 2.41. Further, these sites are unlikely to deliver many of the multi-generational homes with an emphasis on flatted development.
- 2.42. Suburban expansion will play a role in delivering housing, however it is unlikely to deliver significant growth when compare to urban regeneration and rural development given the constraints of the area including the function some of these areas play as a historic landscape gap for existing residents of the area and Medway as a whole.
- 2.43. Rural Development, or more specifically development on the Peninsula, will be a key element of the emerging Plan. We set out our thoughts on this specific option for growth in Section 3 which clearly demonstrate rural development on the Peninsula can assist the Council in achieving the emerging Vision and strategy of the Plan.



2 RESPONSE TO REGULATION 18 CONSULTATION

- 2.44. Green Belt land is likely to play a limited role in meeting Medway's housing needs reflecting on only 5% of the District being Green Belt, and the role it plays in maintaining the separation of settlements.
- 2.45. There may be opportunities for release of Green Belt land, however this needs to be accompanied by the necessary "exceptional circumstances" to fully justify this (NPPF, para 140). This would appear to have not been undertaken presently at this stage in the process.
- 2.46. In addition to the above, Section 5 considers the potential options for employment land with para 5.57 identifying the latest employment evidence (2020) - demonstrating a need for circa. 62 hectares of employment land up to 2037. The need in the emerging Plan period is therefore likely to be greater.
- 2.47. Outside of the Peninsula there are limited opportunities for new employment opportunities as demonstrated by the Land Availability Assessment. Most of these are also in some form of current use, e.g. Diggerland / Medway Valley Park north of the Medway and at Rochester Airport.
- 2.48. Conversely, there are strategic opportunities for employment development at Kingsnorth and Grain on the Peninsula on what is, mostly, extant allocations and previously developed land.
- 2.49. In line with our wider comments on the spatial strategy and the vision for Hoo Peninsula, these employment opportunities should be maximised to create a self-contained community where people can sustainably live, work and play.



3 A VISION FOR THE HOO PENINSULA

- 3.1. As discussed in Section 2, the Hoo Peninsula has potential to support the Strategic Objectives of the Plan by the creation of a sustainable new self-contained community, accommodating new homes and new employment opportunities, alongside the accompanying schools, retail, community health, sports and leisure facilities, strategic highway and sustainable transport infrastructure. We consider the Peninsula is the only location that offers a genuine opportunity to support the Local Plan objectives in this way and through coordinated and comprehensive development including on the Consortium's landholdings.
- 3.2. The Consortium has consistently endorsed the major growth proposals for the Hoo Peninsula that have been identified and articulated in the three previous iterations of the Regulation 18 consultation Local Plan documents published by Medway between 2017 and 2019. The Council's consultation document, The Hoo Development Framework has also been the subject of non-statutory consultation in 2022. The Hoo Consortium has responded to this consultation document articulating its support for the principles of these growth proposals.
- 3.3. The HDF seeks to provide a strategic approach to managing growth of the Peninsula focusing on Hoo St Werburgh and neighbouring settlements. A draft HDF was consulted on by the Council from September to November 2022. As set out in Section 2, we recommend the HDF is updated as part of this Plan-making process to present a longer term vision for the Peninsula that looks further ahead than the Plan period.
- 3.4. Whilst requiring an update to reflect the latest context, i.e. removal of HIF funding, the HDF provides the Council's aims for how comprehensive development could come forward on the Peninsula, through the creation of new vibrant neighbourhoods which link to each other and existing neighbourhoods alongside delivering benefits to the built and wider environment, as well as to local communities and local mobility.
- 3.5. The HDF identifies clear environmental benefits through the delivery of sustainable energy solutions and new green and blue infrastructure that improves wellbeing through the provision of new public spaces, local parks and enhanced accessibility to recreational opportunities. This includes new green links and ecological wildlife corridors connecting existing fragmented habitats and increasing resilience to climate change including through use of Sustainable Urban Drainage Systems.
- 3.6. Mobility benefits consist of improvements to the road network, new public transport and improved pedestrian and cycling networks. This will improve travel choices and reduce the need to drive. Linkages would be provided between existing and proposed services and facilities (inc. the proposed strategic employment opportunities) and the new neighbourhoods, such that there would be a high degree of internalisation / self-containment of journeys. Together, the mobility benefits would aim to reduce traffic and pollution, addressing known issues locally.
- 3.7. Benefits for the community include vibrant village centres, new services and improved infrastructure, and a new network of public open spaces. There will be multiple new schools, as well as new health facilities, shops, businesses, leisure and community services provided



3 A VISION FOR THE HOO PENINSULA

within close proximity of new and existing homes. Overall, the HDF identifies there will be a strengthening to the existing settlements, including reinforcement of existing retail provision alongside new opportunities.

- 3.8. The HDF identifies the built environment being enhanced through high quality design, creation of healthy streets, integrated neighbourhoods, attractive environments and an enhanced historic environment. Development along settlement fringes and adjacent to countryside would provide a seamless integration of natural and built components.
- 3.9. The Interim Sustainability Appraisal Report (March 2017) prepared at the 'Regulation 18' stage of the previous attempt of Plan-making considered a number of development scenarios, including a significant focus on the Peninsula. Whilst a new Sustainability Appraisal will be required through this Plan-making process, the previous Sustainability Appraisal demonstrated the Council's views on the social, economic and environmental considerations relating to the development scenario of focussing growth on the Peninsula, including:
- Planned expansion of Hoo into a small rural town including the provision of additional employment and retail land, boosting job opportunities in these areas;
 - Significant development on the Hoo Peninsula strengthening the attraction of the existing large employment sites;
 - New development increasing the attractiveness of the rural area as a location for business investment;
 - The small rural town centre supporting the wider area of the Hoo Peninsula, offering a more accessible location for services and shopping. This could strengthen the vitality of Hoo St Werburgh and reduce potential car journeys on the Hoo Peninsula;
 - Local supply chains benefitting centres in the Peninsula and other businesses, which can contribute toward the diversification of uses in the existing centres;
 - Opportunities to provide new country parks around Hoo as part of a wider development of a small rural town to secure a rural character and distinctive breaks between urban and rural areas;
 - Growth of Hoo to a small rural town providing opportunities to embed healthy living principles. These could include effective and attractive green infrastructure to support walking and cycling; provision of accessible local services, supporting community interaction; and
 - The development of a small rural town at Hoo addressing issues of rural disadvantage and improve access to services.
- 3.10. The Consortium shares the Council's aims for the Peninsula to grow Hoo St Werburgh and Chattenden into a sustainable rural town.
- 3.11. The Consortium's proposals could, over the next 30 years, deliver a significant range of public benefits for the Peninsula and wider District, including 8,000-10,000 new homes, new employment opportunities (alongside wider strategic employment opportunities on the



3 A VISION FOR THE HOO PENINSULA

Peninsula), new schools (primary and secondary), retail, community health, sports and leisure facilities, and strategic highway and sustainable transport infrastructure improvements. This would be complemented by major areas of strategic green space including community parkland, strategic environmental mitigation and biodiversity net gain.

- 3.12. As noted previously, we consider the Peninsula is the only location that offers a genuine opportunity to provide a coordinated and comprehensive development that addresses a sizable portion of the District's housing and economic needs over the Plan-period, and in a way that helps achieve the Council's Vision for Medway and the Strategic Objectives of the Plan.
- 3.13. The Consortium's proposals would deliver all of the homes, employment, leisure, retail, recreation, education and health facilities to create a new sustainable self-contained community. Further, it would provide the critical mass needed to contribute to the infrastructure requirements of the Plan and support growth both on and off the Peninsula.



4 SUMMARY

- 4.1. As set out in these Representations, we support the emerging vision and strategic objectives of the Consultation Document which look to establish the District as a regional leader in terms of its economy and quality of life through a people-centred plan. The Council can achieve this through ensuring the housing, employment, social and physical infrastructure needs of the District are met in full.
- 4.2. Delivery on the Peninsula is the best opportunity the Council has of achieving this through coordinated and comprehensive development which delivers significant new homes, including affordable housing, new employment opportunities and strategic green space including community parkland, strategic environmental mitigation and biodiversity net gain. This would be supported by provision of new education facilities, retail, community and health provision, sports and leisure facilities and strategic highway and sustainable transport infrastructure.
- 4.3. Through this, there is a genuine opportunity to create a more self-contained community, providing for day-to-day needs where people live and work, and supporting the strategic objectives of the Plan.
- 4.4. We support the Council's recognition that there is a housing crisis and an "absolute need" to provide homes in the right places to meeting the growing needs of the District. To achieve this, the Council will need to ensure the Plan and its Evidence Base are underpinned by the goal to meet known needs in full, including addressing issues of deprivation and housing needs, as well as looking to drive investment in the local economy.
- 4.5. As part of this, it will be important sufficient suitable and deliverable / developable land is allocated. The Council will need to be confident in its existing commitments, i.e. that this remains deliverable and will contribute over the Plan period, and it is not over reliant on windfall provision in the context of a "plan-led" system.
- 4.6. To meet the scale of growth required across the District, it is likely the final Spatial Strategy will involve components of supply from across all parts of the District, with a significant focus on urban regeneration and rural development on the Hoo Peninsula.
- 4.7. Suburban expansion is likely to play a smaller role, with less scope for development in this area to come forward comprehensively, plus there being an absence of nearby employment opportunities and development in these areas not being of a scale to deliver infrastructure of more than a local benefit.
- 4.8. Conversely, the Hoo Peninsula provides the unique opportunity for bringing forward a comprehensive development through the creation of new vibrant neighbourhoods which link to each other and existing neighbourhoods, and nearby strategic employment opportunities, alongside delivering benefits to the built and wider environment, as well as to local communities and local mobility.
- 4.9. The Consortium supports this approach which has been identified and articulated in the three previous iterations of the Regulation 18 consultation Local Plan documents published by



4 SUMMARY

Medway between 2017 and 2019, as well as within the draft Hoo Development Framework consulted on by the Council in 2022.

- 4.10. We look forward to working alongside the Council over the next 12 months as it progresses towards submission of the draft Local Plan, to enable delivery of a “Sound” Local Plan which achieves the housing, employment, social and physical infrastructure needs of the District in full and maximises the opportunities available across the District, including those on the Hoo Peninsula.



APPENDIX A
START TO FINISH, SECOND EDITION
FEBRUARY 2020

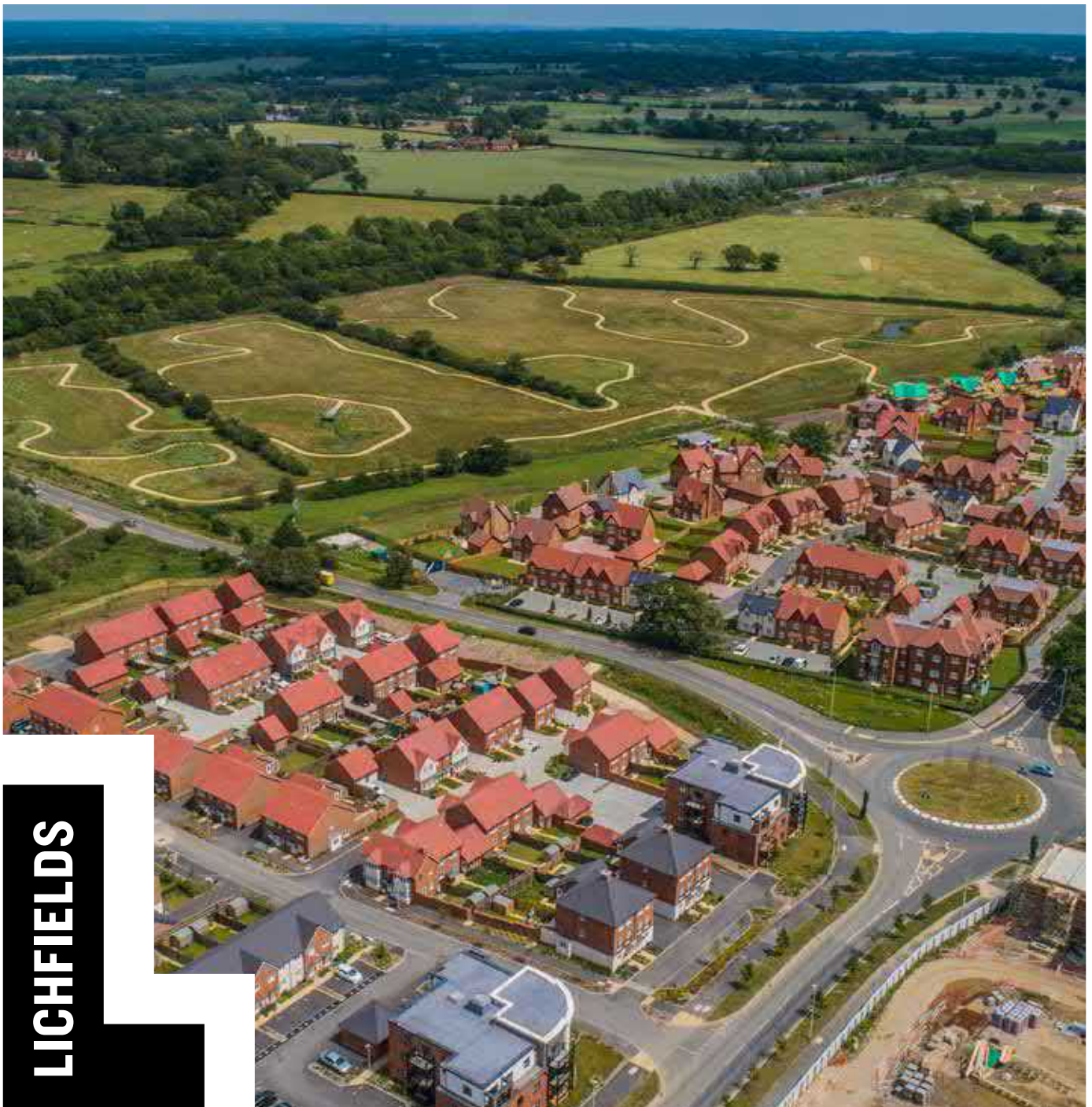


INSIGHT
FEBRUARY 2020

Start to Finish

What factors affect the build-out rates of large scale housing sites?

SECOND EDITION



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Executive summary

Lichfields published the first edition of Start to Finish in November 2016. In undertaking the research, our purpose was to help inform the production of realistic housing trajectories for plan making and decision taking. The empirical evidence we produced has informed numerous local plan examinations, S.78 inquiries and five-year land supply position statements.

Meanwhile, planning for housing has continued to evolve: with a revised NPPF and PPG; the Housing Delivery Test and Homes England upscaling resources to support implementation of large sites. Net housing completions are also at 240,000 dwellings per annum. With this in mind, it is timely to refresh and revisit the evidence on the speed and rate of delivery of large scale housing sites, now looking at 97 sites over 500 dwellings. We consider a wide range of factors which might affect lead-in times and build-out rates and have drawn four key conclusions.

In too many local plans and five-year land supply cases, there is insufficient evidence for how large sites are treated in housing trajectories. Our research seeks to fill the gap by providing some benchmark figures - which can be of some assistance where there is limited or no local evidence - but the averages derived from our analysis are not intended to be definitive and are no alternative to having a robust, bottom-up justification for the delivery trajectory of any given site.

We have drawn four key conclusions:

<p>1 Large schemes can take 5+ years to start</p>	<p>2 Lead-in times jumped post recession</p>
<p>Our research shows that if a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in c.3 years. However, from the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered; such sites would make no contribution to completions in the first five years.</p>	<p>Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining pre-commencement conditions, but is also likely impacted by a number of macro factors.</p>
<p>3 Large greenfield sites deliver quicker</p>	<p>4 Outlets and tenure matter</p>
<p>Large sites seem to ramp up delivery beyond year five of the development on sites of 2,000+ units. Furthermore, large scale brownfield sites deliver at a slower rate than their greenfield equivalents: the average rate of build out for greenfield sites in our sample is 34% greater than the equivalent brownfield.</p>	<p>Our analysis suggests that having additional outlets on site has a positive impact on build-out rates. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site. Local plans should reflect that - where viable - higher rates of affordable housing supports greater rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale.</p>

Key figures

180

sites assessed, with combined yield of 213k+ dwellings; 97 sites had 500+ homes

c.3yrs

average time taken from outline decision notice to first dwelling completions on sites of 500+ homes

8.4yrs

the average time from validation of the first planning application to the first dwelling being completed on schemes of 2,000+ dwellings

160 dpa

the average annual build-out rate for a scheme of 2,000+ dwellings (median: 137)

68 dpa

the average annual build rate of a scheme of 500-999 dwellings (median: 73)

+34%

higher average annual build-out rate on greenfield sites compared with brownfield sites

61 dpa

average completions per outlet on sites with one outlet, dropping to 51 for sites of two outlets, and 45 for sites with three outlets

O1 Introduction

This is the second edition of our review on the speed of delivery on large-scale housing development sites. The first edition was published in November 2016 and has provided the sector with an authoritative evidence base to inform discussions on housing trajectories and land supply at planning appeals, local plan examinations and wider public policy debates.

Over this period, housing delivery has remained at or near the top, of the domestic political agenda: the publication of the Housing White Paper, the new NPPF, an emboldened Homes England, a raft of consultations on measures intended to improve the effectiveness of the planning system and speed up delivery of housing. Of particular relevance to *Start to Finish* was the completion of Sir Oliver Letwin's independent review of build out ("the Letwin Review"), the inclusion within the revised NPPF of a tighter definition of 'deliverable' for the purposes of five-year housing land supply (5YHLS) assessment, and the new Housing Delivery Test which provides a backward looking measure of performance. The policy aim is to focus more attention on how to accelerate the rate of housing build out, in the context of the NPPF (para 72) message that the delivery of a large numbers of new homes can often be best achieved through larger scale development such as new settlements or significant extensions to existing villages and towns, but that these need a realistic assessment of build-out rates and lead in times of large-scale development.

This second edition of *Start to Finish* is our response to the latest policy emphasis. It provides the planning sector with real-world benchmarks to help assess the realism of housing trajectory assumptions, particularly for locations where there have been few contemporary examples of strategic-scale development. The first edition looked in detail at how the size of the site affected build-out rates and lead in times, as well as other factors such as the value of the land and whether land was greenfield or brownfield. We have updated these findings, as well as considering additional issues such as how the affordability of an area and the number of outlets on a site impacts on annual build-out rates.

We have also expanded the sample size (with an extra 27 large sites, taking our total to 97 large sites, equivalent to over 195,000 dwellings) and updated with more recent data to the latest monitoring year (all data was obtained at or before the 1st April 2019).



Our research complements, rather than supplants, the analysis undertaken by Sir Oliver Letwin in his Review. The most important differentiation is that we focus exclusively on what has been built, whereas each of the sites in the Letwin Review included forecasts of future delivery. Additionally, the Letwin Review looked at 15 sites of 1,500+ homes, of which many (including the three largest) were in London. By contrast, the examples in this research sample include 46 examples of sites over 1,500 homes across England and Wales, the majority of which are currently active. As with the first edition of our research, we have excluded London because of the distinct market and delivery factors in the capital.

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05	What factors influence build-out rates?	14
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180

sites

97

large sites of 500
units or more

27

additional sites
compared with our
2016 research

8

sites also included
in Sir Oliver Letwin's
review

O2

Methodology

The evidence presented in this report analyses how large-scale housing sites emerge through the planning system, how quickly they build out, and identifies the factors which lead to faster or slower rates of delivery.

We look at the full extent of the planning and delivery period. To help structure the research and provide a basis for standardised measurement and comparison, the various stages of development have been codified. Figure 1 sets out the stages and the milestones used, which remain unchanged from the first edition of this research. The overall 'lead-in time' covers stages associated with gaining an allocation, going through the 'planning approval period' and 'planning to delivery period', finishing when the first dwelling is completed. The 'build period' commences when the first dwelling is completed, denoting the end of the lead-in time. The annualised build-out rates are also recorded for the development up until the latest year where data was available at April 2019 (2017/18 in most cases). Detailed definitions of each of these stages can be found in Appendix 1. Not every site assessed will necessarily have gone through each component of the identified stages as many of the sites we considered had not delivered all dwellings permitted at the time of assessment, some have not delivered any dwellings.

Information on the process of securing a development plan allocation (often the most significant step in the planning process for large-scale schemes, and which – due to the nature of the local plan process – can take decades) is not easy to obtain on a consistent basis across all examples, so is not a significant focus of our analysis. Therefore, for the purposes of this research the lead-in time reflects the start of the planning approval period up to the first housing completion.

The 'planning approval period' measures the validation date of the first planning application on the site (usually an outline application but sometimes hybrid), to the decision date of the first detailed application to permit dwellings in the scheme (either full, hybrid or reserved matters applications). It is worth noting that planning applications are typically preceded

by significant amounts of pre-application engagement and work, plus the timescale of the local plan process.

The 'planning to delivery' period follows immediately after the planning approval period and measures the period from the approval of the first detailed application to permit development of dwellings and the completion of the first dwelling.

Development and data

Whilst our analysis focuses on larger sites, we have also considered data from the smaller sites for comparison and to identify trends. The geographic distribution of the 97 large sites and comparator small sites is shown in Figure 2 and a full list can be found in Appendix 2 (large sites) and Appendix 3 (small sites).

Efforts were made to secure a range of locations and site sizes in the sample, but there is no way of ensuring it is representative of the housing market in England and Wales as a whole, and thus our conclusions may not be applicable in all areas or on all sites. In augmenting our sample with 27 additional large sites, new to this edition of our research, we sought to include examples in the Letwin Review that were outside of London, only excluding them

Box 1: Letwin Review sites

1. Arborfield Green (also known as Arborfield Garrison), Wokingham
2. Ledsham Garden Village, Cheshire West & Chester
3. Great Kneighton (also known as Clay Farm), Cambridge (included in the first edition of this research)
4. Trumpington Meadows, Cambridge
5. Graven Hill, Cherwell
6. South West Bicester, Cherwell
7. Great Western Park, South Oxfordshire
8. Ebbsfleet, Gravesham and Dartford (included in the first edition of this research)

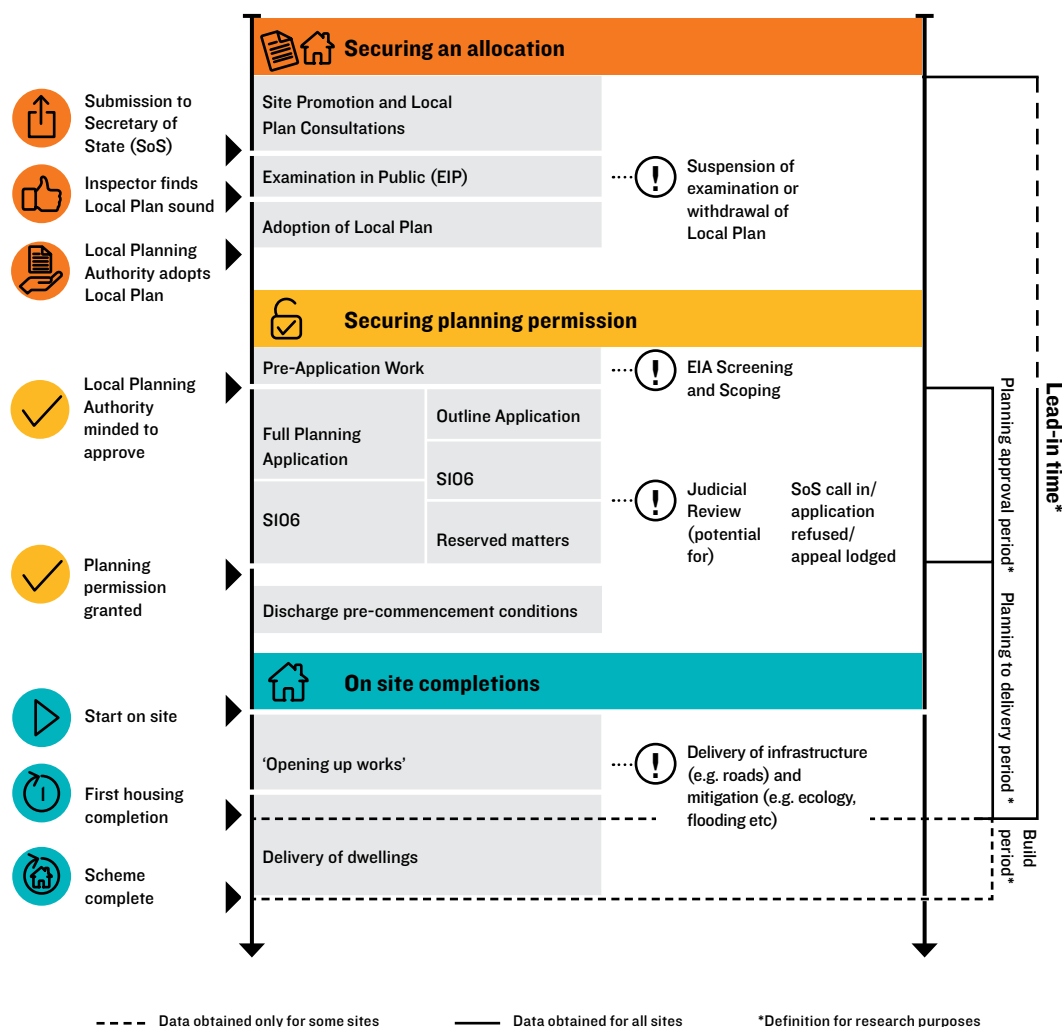
when it was difficult to obtain reliable data. The study therefore includes the Letwin Review's case studies listed in Box 1.

In most instances, we were unable to secure the precise completion figures for these sites that matched those cited in the Letwin Review. Sources for data Lichfields has obtained on completions for those sites that also appear in the Letwin Review are included at the end of Appendix 2.

The sources on which we have relied to secure delivery data on the relevant sites include:

1. Annual Monitoring Reports (AMRs) and other planning evidence base documents¹ produced by local authorities;
2. By contacting the relevant local planning authority, and in some instances the relevant County Council, to confirm the data or receive the most up to date figures from monitoring officers or planners; and
3. In a handful of instances obtaining/confirming the information from the relevant house builders.

Figure I: Timeline for the delivery of strategic housing sites



Source: Lichfields analysis

¹ Monitoring documents, five-year land supply reports, housing trajectories (some in land availability assessments), housing development reports and newsletters

196,714

units on large sites
of 500 or more
homes

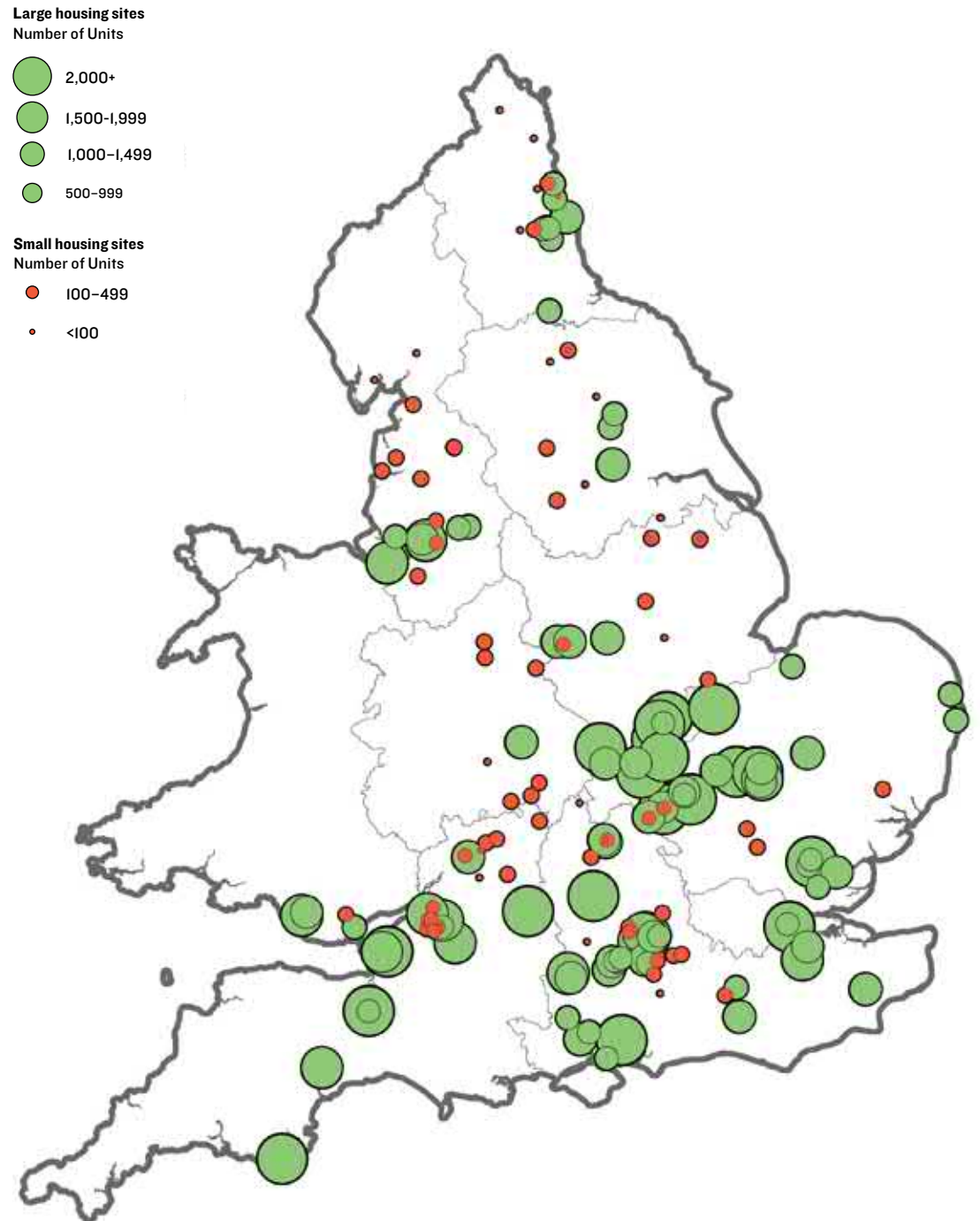
16,467

units on small sites
under 500 homes

35

sites of 2,000
homes or more

Figure 2: Map of site sample by size of site (total dwellings)



Source: Lichfields analysis

03 Timing is everything: how long does it take to get started?

In this section we look at lead in times, the time it takes for large sites to get the necessary planning approvals. Firstly, the changing context of what 'deliverable' means for development. Secondly, the 'planning approval period' (the time it takes for large sites to get the necessary planning approvals). And thirdly, the 'planning to delivery period' (the time from approval of the first detailed application to permit development of dwellings to the completion of the first dwelling).

The new definition of 'Deliverable'

The question of how quickly and how much housing a site can begin delivering once it has planning permission, or an allocation, has become more relevant since the publication of the new NPPF with its new definition of deliverable. Only sites which match the deliverability criteria (i.e. suitable now, available now and achievable with a realistic prospect that housing will be delivered on the site within five years) can be included in a calculation of a 5YHLS by a local authority. This definition was tightened in the revised NPPF which states that:

"sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be

considered deliverable where there is clear evidence that housing completions will begin on site within five years". (emphasis added)

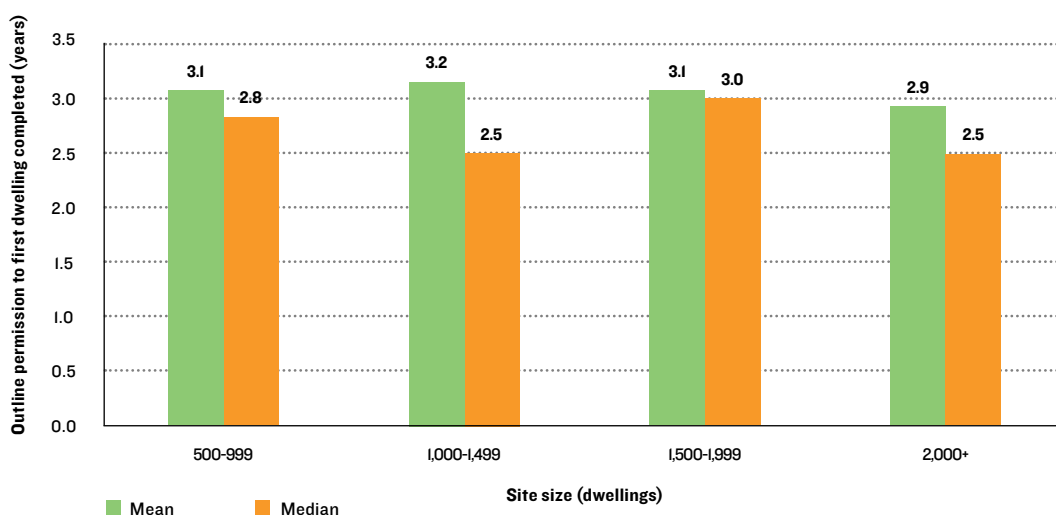
What constitutes 'clear evidence' was clarified in a number of early appeal decisions and in the Planning Practice Guidance² and can include information on progress being made towards submission of a reserved matters application, any progress on site assessment work and any relevant information about site viability, ownership constraints or infrastructure provision. In this context, it is relevant to look at how long it takes, on average, for a strategic housing site to progress from obtaining outline permission to delivering the first home (or how long it takes to obtain the first reserved matters approval, discharge pre-commencement conditions and open up the site), and then how much housing could be realistically expected to be completed in that same five-year period.

Based on our sample of large sites, the research shows that, upon granting of outline permission, the time taken to achieve the first dwelling is – on average c.3 years, regardless of site size. After this period an appropriate build-out rate based on the size of the site should also be considered as part of the assessment of deliverability (see Section 4). Outline planning permissions for strategic development are not

c.3 years

average time from obtaining outline permission to first dwelling completion on sites of 500+ homes

Figure 3: Average time taken from gaining outline permission to completion of the first dwelling on site (years), compared to site size



Source: Lichfeilds analysis

² Planning Practice Guidance Reference ID: 68-007-20190722



Only sites of fewer than 499 dwellings are on average likely to deliver any homes within an immediate five year period.

always obtained by the company that builds the houses, indeed master developers and other land promoters play a significant role in bringing forward large scale sites for housing development³. As such, some of these examples will include schemes where the land promoter or master developer will have to sell the site (or phases/parcels) to a housebuilder before the detailed planning application stage can commence, adding a step to the planning to delivery period.

Figure 4 considers the average timescales for delivery of the first dwelling from the validation of an outline planning application. This demonstrates that only sites comprising fewer than 499 dwellings are – on average – likely to deliver anything within an immediate five year period. The average time from validation of an outline application⁴ to the delivery of the first dwelling for large sites ranges from 5.0 to 8.4 years dependent on the size of the site, i.e. beyond an immediate five-year period for land supply calculations.

Comparison with our 2016 findings

Planning Approval Period

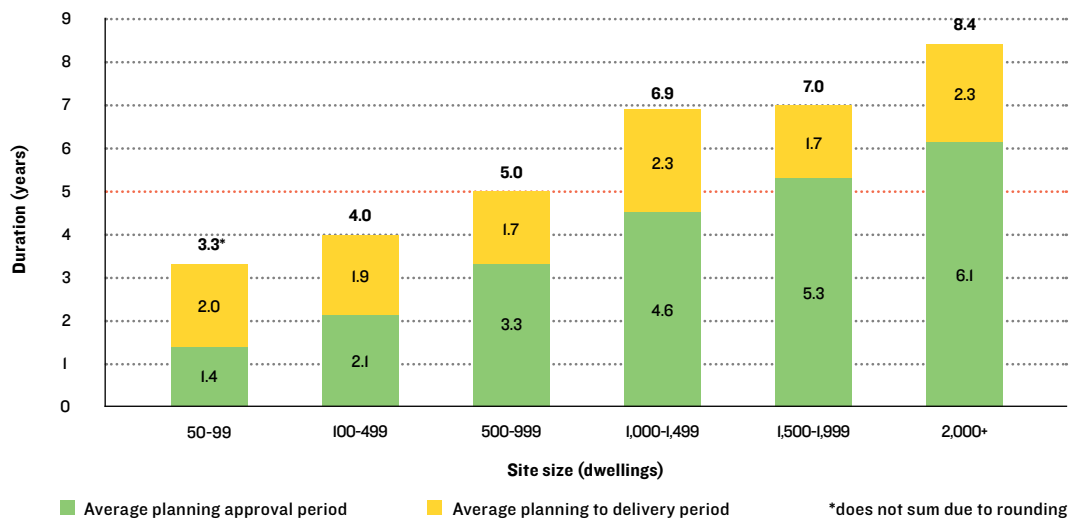
Our latest research reveals little difference between the average planning approval period by site size compared to the same analysis in the first edition (see Table 1). However, it is important to remember that these are average figures which come from a selection of large sites. There are significant variations within this average, with some sites progressing very slowly or quickly compared to the other examples. This is unsurprising as planning circumstances will vary between places and over time.

Table 1: Average planning approval period by size of site (years)

Site Size	1st edition research (years)	This research (years)
50-99	1.1	1.4
100-499	2.4	2.1
500-999	4.2	3.3
1,000-1,499	4.8	4.6
1,500-1,999	5.4	5.3
2,000+	6.1	6.1

Source: Lichfields analysis

Figure 4: Average timeframes from validation of first application to completion of the first dwelling



Source: Lichfields analysis

³ Realising Potential - our research for the Land Promoters and Developers Federation in 2017 - found that 41% of homes with outline planning permission were promoted by specialist land promoter and development companies, compared to 32% for volume house builders.

⁴ The planning approval period could also include a hybrid or full application, but on the basis of our examples this only impacts a small number of sites

Planning to Delivery Period

Although there is little difference between the average planning approval periods identified in this research compared to our first edition findings, the average lead-in time after securing planning permission is higher (Figure 5). It is this period during which pre-commencement planning conditions have to be discharged as well as other technical approvals and associated commercial agreements put in place.

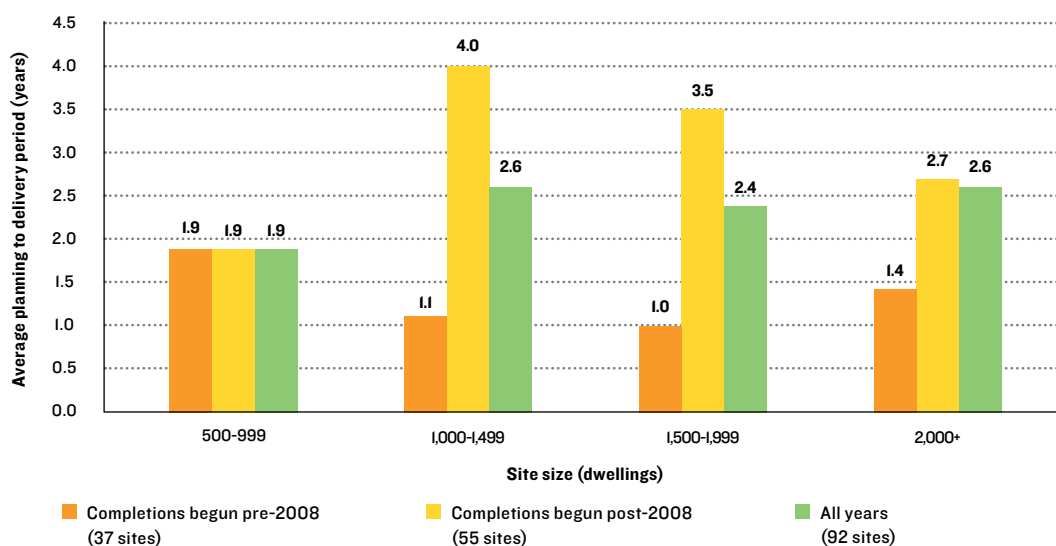
This is likely due to the inclusion of more recent proposed developments in this edition. Of the 27 new sites considered, 17 (63%) completed their first dwelling during or after 2012; this compares to just 14 (20%) out of 70 sites in the first edition of this research (albeit at the time of publication 8 of these sites had not delivered their first home but have subsequently). This implies that the introduction of more recent examples into the research, including existing examples which have now commenced delivery⁵, has seen the average for planning to delivery periods lengthening.

A similar trend is apparent considering the 55 sites that delivered their first completions after 2007/08. These have significantly longer planning to delivery periods than those where completions began prior to the recession. The precise reasons are not clear, but is perhaps to be expected given the slowdown in housing delivery during the recession, and the significant reductions in local authority planning resources which are necessary to support discharge of pre-commencement conditions. However, delays may lie outside the planning system; for example, delays in securing necessary technical approvals from other bodies and agencies, or market conditions.



Sites that delivered their first completion during or after the 2007/08 recession have significantly longer planning to delivery periods than sites which began before.

Figure 5: Planning to delivery period, total average, pre and post-2008



Source: Lichfields analysis

Figure 5: Five of the large sites examples do not have a first dwelling completion recorded in this research

⁵ Priors Hall has been amended since the first edition based on more recent data

In demand: how quickly do high pressure areas determine strategic applications for housing?

Using industry-standard affordability ratios, we found that areas with the least affordable places to purchase a home (i.e. the highest affordability ratios) tended to have longer planning to delivery times than areas that were more affordable. This is shown in Figure 6, which splits the large site sample into national affordability quartiles, with the national average equating to 8.72.

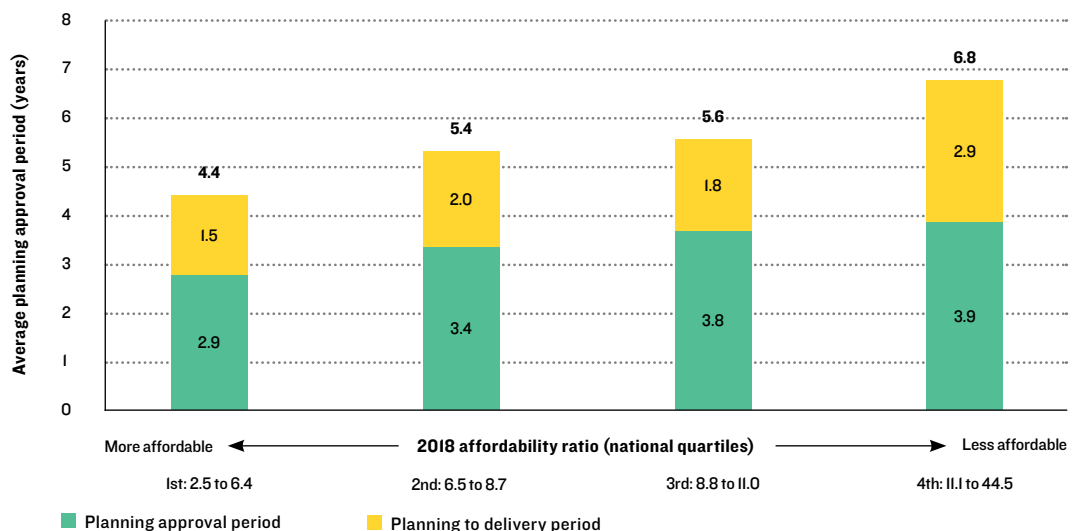
The above analysis coincides with the fact (Table 2) that sites in the most affordable locations (lowest quartile) tend to be smaller than those in less affordable locations (an average site size of c.1,150 compared to in excess of 2,000 dwellings for the three other quartiles). Even the least affordable LPAs (with the greatest gap between workplace earnings and house prices) have examples of large schemes with an average site size of 2,000+ dwellings. It may be that the more affordable markets do not support the scale of up-front infrastructure investment that is required for larger-scale developments and which lead to longer periods before new homes can be built. However, looking at the other three quartiles, the analysis does also suggest that planning and implementation becomes more challenging in less affordable locations.

Table 2: Site size by 2018 affordability ratio

Affordability ratio (workplace based)	Average site size
2.5 – 6.4	1,149
6.5 – 8.7	2,215
8.8 – 11.0	2,170
11.1 – 44.5	2,079

Source: Lichfields analysis

Figure 6: Planning approval period (years) by 2018 affordability ratio



Source: Lichfields analysis

04 How quickly do sites build out?

The rate at which new homes are built on sites is still one of the most contested matters at local plan examinations and planning inquiries which address 5YHLS and housing supply trajectories. The first edition of this research provided a range of 'real world' examples to illustrate what a typical large-scale site delivers annually. The research showed that even when some schemes were able to achieve very high annual build-out rates in a particular year (the top five annual figures were between 419-620 dwellings per annum), this rate of delivery was not always sustained. Indeed, for schemes of 2,000 or more dwellings the average annual completion rate across the delivery period was 160 dwellings per annum.

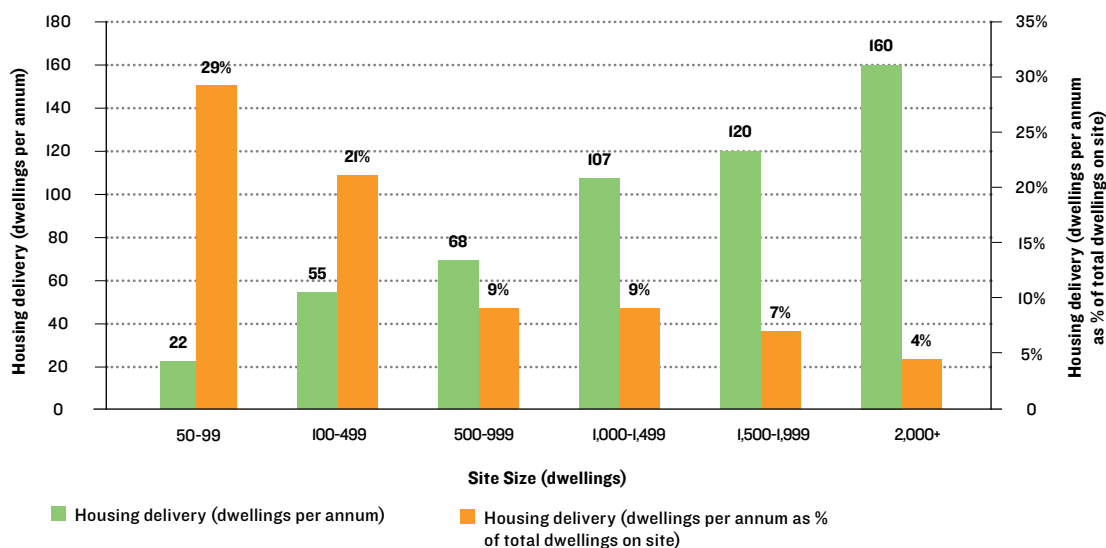
Average Annual Build-out rates

Figure 7 presents our updated results, with our additional 27 sites and the latest data for all sites considered. The analysis compares the size of site to its average annual build-out rate. Perhaps unsurprisingly, larger sites deliver on average more dwellings per year than smaller sites. The largest sites in our sample of over 2,000 dwellings, delivered on average more than twice as many dwellings per year than sites of 500-999 dwellings, which in turn delivered an average of three times as many units as sites of 1-99 units. To ensure the build-out rates averages are not unduly skewed, our analysis excludes any sites which have only just started delivering and have less than three years of data. This is because it is highly unlikely that the first annual completion figure would actually cover a whole monitoring year, and as such could distort the average when compared to only one other full year of delivery data.

160 dpa

the average annual build rate for schemes of 2,000+ dwellings

Figure 7: Build-out rate by size of site (dpa)



Source: Lichfields analysis

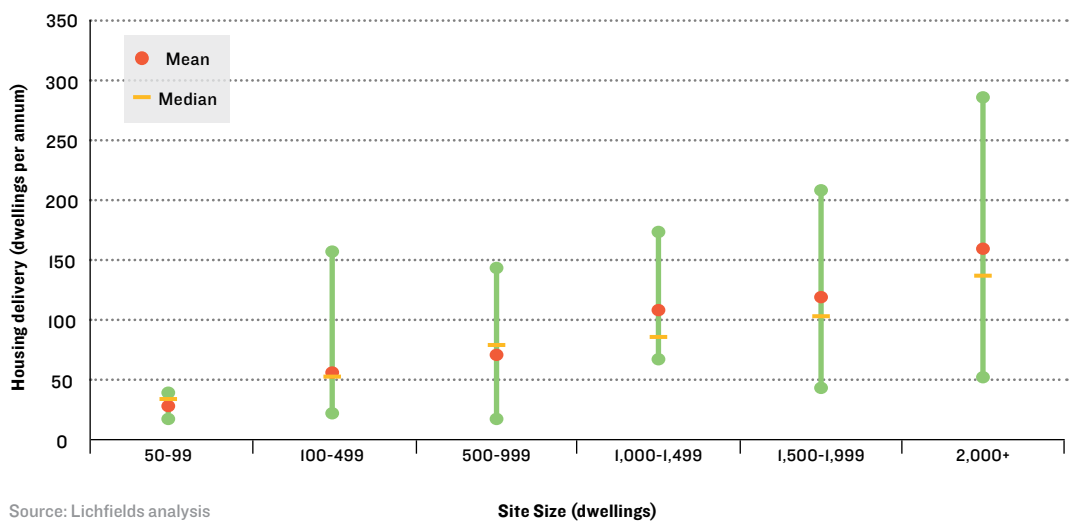


In most cases the median annual delivery rate is lower than the mean for larger sites.

We include the relevant percentage growth rates in this edition's analysis; this shows that the proportion of a site's total size that is build out each year reduces as site size increases.

Our use of averages refers to the arithmetic mean across the sample sites. In most cases the median of the rates seen on the larger sample sites is lower, as shown in Figure 8; this reflects the small number of sites which have higher delivery rates (the distribution is not equal around the average). The use of mean average in the analysis therefore already builds in a degree of optimism compared with the median or 'mid-point scheme'.

Figure 8: Minimum, mean, median and maximum build-out rates by size of site (dpa)



Source: Lichfields analysis

Table 3: Median and mean delivery rates by site size

Site Size	Number of sites	Median housing delivery (dwellings per annum)	Median delivery as % of total on site	Mean annual delivery (dwellings per annum)	Mean annual delivery as % of total units on site
50-99	29	27	33%	22	29%
100-499	54	54	24%	55	21%
500-999	24	73	9%	68	9%
1,000-1,499	17	88	8%	107	9%
1,500-1,999	9	104	7%	120	7%
2,000+	27	137	4%	160	4%

Source: Lichfields analysis

Comparison with our 2016 findings

Comparing these findings to those in the first edition of this research, there is very little difference between the averages observed (median was not presented) for different site sizes, as set out below. The largest difference is a decrease in average annual build-out rates for sites of 1,000-1,499 dwellings, but even then, this is only a reduction of 10 dpa or 9%.

As with the first edition of the research, these are averages and there are examples of sites which deliver significantly higher and lower than these averages, both overall and in individual years. Figure 8 shows the divergence from the average for different site size categories. This shows that whilst the average for the largest sites is 160 dpa and the median equivalent 137 dpa, the highest site average was 286 dpa and the lowest site average was 50 dpa for sites of 2,000+ dwellings. This shows the need for care in interpreting the findings of the research, there may well be specific factors that mean a specific site will build faster or slower than the average. We explore some of the factors later in this report.

Variations for individual schemes can be marked. For example, the 2,605 unit scheme South of the M4 in Wokingham delivered 419 homes in 2017/18, but this was more than double the completions in 2016/17 (174) and the average over all six years of delivery so far was just 147 dwellings per annum.

Even when sites have seen very high peak years of delivery, as Table 5 shows, no sites have been able to consistently delivery 300 dpa.



Site build-out rates for individual years are highly variable. For example, one scheme in Wokingham delivered more than twice as many homes in 2017/18 as it did in the year before.

Table 4: Mean delivery rates by site sizes, a comparison with first edition findings

Site size (dwellings)	2016 edition research (dpa)	2020 edition research (dpa)	Difference
50-99	27	22	-5 (-19%)
100-499	60	55	-5 (-8%)
500-999	70	68	-2 (-3%)
1,000-1,499	117	107	-10 (-9%)
1,500-1,999	129	120	-9 (-7%)
2,000+	161	160	-1 (-0.62%)

Source: Lichfields analysis

Table 5: Peak annual build-out rates compared against average annual delivery rates on those sites

Site	Site size (dwellings)	Peak annual build-out rate (dpa)	Average annual build-out rate (dpa)
Cambourne, South Cambridgeshire	4,343	620	223
Oakley Vale, Corby	3,100	520	180
Eastern Expansion Area, Milton Keynes	4,000	473	268
Clay Farm, Cambridge	2,169	467	260
South of M4, Wokingham	2,605	419	147
Cranbrook, East Devon	2,900	419	286

Source: Lichfields analysis

Table 5: Please note The Hamptons was included as an example of peak annual delivery in the first edition with one year reaching 520 completions. However, evidence for this figure is no longer available and as it was not possible to corroborate the figure it has been removed. The analysis has been updated to reflect the latest monitoring data from Peterborough City Council.

Longer term trends

This section considers the average build-out rates of sites which have been delivering over a long period of time. This is useful in terms of planning for housing trajectories in local plans when such trajectories may span an economic cycle.

In theory, sites of more than 2,000 dwellings will have the longest delivery periods. Therefore, to test long term averages we have calculated an average build-out rate for sites of 2,000+ dwellings that have ten years or more of completions data available.

For these sites, the average annual build-out rate is slightly higher than the average of all sites of that size (i.e. including those only part way through build out), at 165 dwellings per annum⁶. The median for these sites was also 165 dwellings per annum.

This indicates that higher rates of annual housing delivery on sites of this size are more likely to occur between years five and ten, i.e. after these sites have had time to ‘ramp up’.

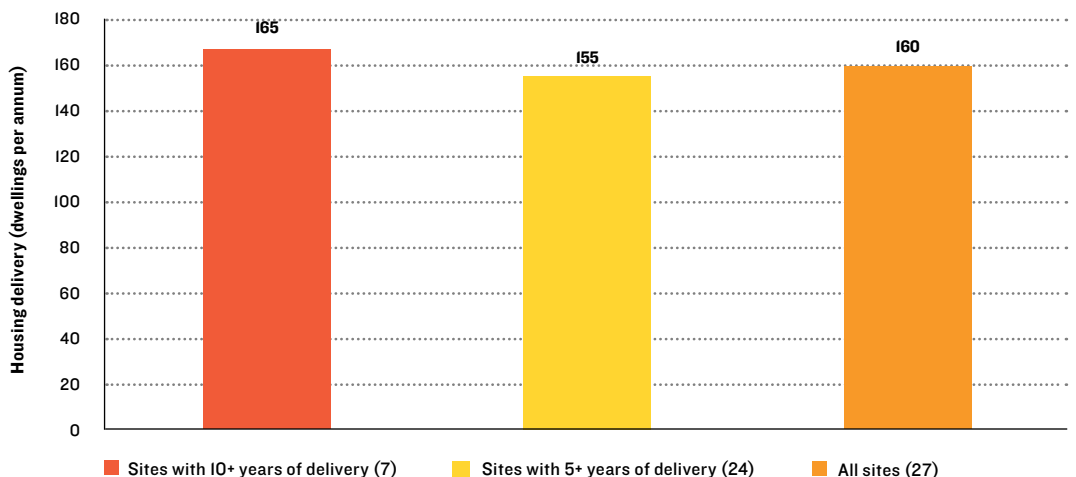
It might even relate to stages in delivery when multiple phases and therefore multiple outlets (including affordable housing) are operating at the same time. These factors are explored later in the report.

The impact of the recession on build-out rates

It is also helpful to consider the impact of market conditions on the build-out rate of large scale housing sites. Figure 10 overleaf shows the average delivery rate of sites of 2,000 or more dwellings in five-year tranches back to 1995/96. This shows that although annual build-out rates have improved slightly since the first half of the 2010’s, they remain 37% below the rates of the early 2000’s. The reasons for the difference are not clear and are worthy of further exploration – there could be wider market, industry structure, financial, planning or other factors at play.

In using evidence on rates of delivery for current/historic schemes, some planning authorities have suggested that one should adjust for the fact that rates of build out may have been affected by the impact of the recession. We have therefore considered how the average rates change with and without including the period of economic downturn (2008/09 – 2012/13). This is shown in Table 6 and it reveals that average build-out rates are only slightly depressed when one includes this period, but may not have fully recovered to their pre-recession peaks. We know that whilst the recession – with the crunch on mortgage

Figure 9: Average build-out rate for sites over 2,000 homes by length of delivery period (dpa)



Source: Lichfields analysis

⁶ This is based on the completions of seven examples, Chapelford Urban Village, Broadlands, Kings Hill, Oakley Vale, Cambourne, The Hamptons and Wixhams

availability – did have a big impact and led to the flow of new sites slowing, there were mechanisms put in place to help sustain the build out of existing sites.

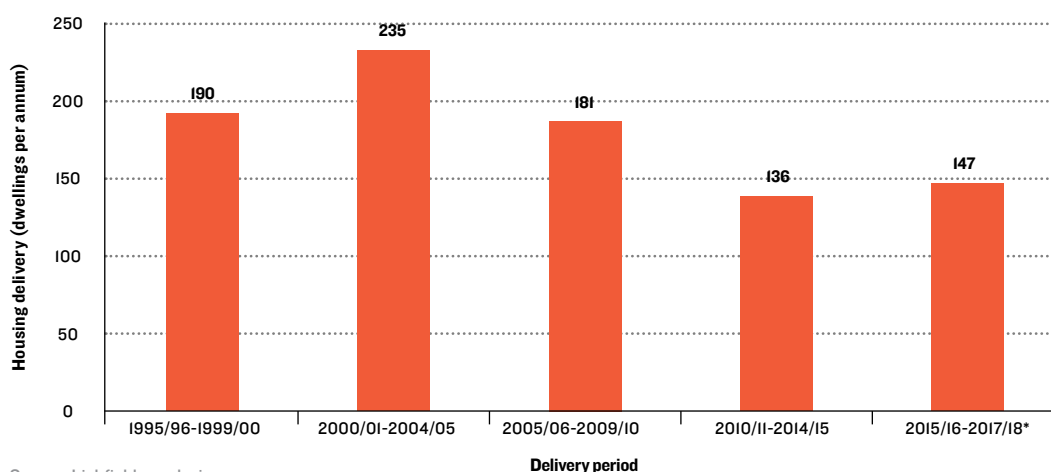
However, setting aside that stripping out the recession has a modest impact on the statistical averages for the sites in our sample, the more significant point is that – because of economic cycles - larger sites which build out over five or more years are inherently likely to coincide with a period of economic slowdown at some point during their build out. It therefore makes sense for housing trajectories for such sites to include an allowance for the prospect that, at some point, the rate of build out may slow due to a market downturn, albeit the effect may be smaller than one might suspect.

Table 6: Impact of recession on build-out rates

	Build-out rates in all years		Build-out rates excluding recession years (2008/9-2012/13)		Build-out rates pre-recession	
	Average rate	Sample size	Average rate	Sample size	Average rate	Sample size
All large sites 500+	115	77	126	68	130	21
All large sites 2,000+	160	27	171	25	242	6
Greenfield sites 2,000+	181	14	198	12	257	3

Source: Lichfields analysis

Figure 10: Average build-out rate by five year period for sites over 2,000 dwellings (dpa)



Source: Lichfields analysis

05 What factors can influence build-out rates?

+34%

higher average annual build-out rates on greenfield land compared with brownfield

Having established some broad averages and how these have changed over time, we turn now to look at what factors might influence the speed at which individual sites build out. How does housing demand influence site build out? What is the impact of affordable housing? Does it matter whether the site is greenfield or brownfield? What about location and site configuration?

In demand: do homes get delivered faster in high pressure areas?

One theory regarding annual build-out rates is that the rate at which homes can be sold (the 'absorption rate') determines the build-out rate. This is likely to be driven by levels of market demand relative to supply for the product being supplied.

This analysis considers whether demand for housing at the local authority level affects delivery rates by using (industry-standard) affordability ratios. Higher demand areas are indicated by a higher ratio of house prices to earnings i.e. less affordable. Whilst this is a broad-brush measure, the affordability ratio is a key metric in the assessment of local housing need under the Government's standard methodology. Figure 11 shows the sample of 500+ unit schemes divided into those where the local authority in which they are located is above or below the national median affordability ratio (8.72) for sites which have

delivered for three years or more. This analysis shows that sites in areas of higher demand (i.e. less affordable) deliver on average more dwellings per annum.

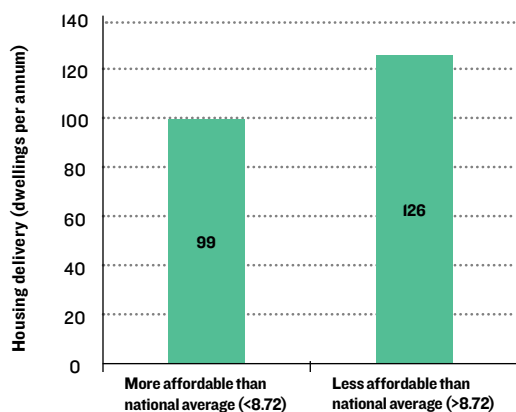
Our analysis also coincides with the fact that sites in less affordable areas are on average c.17% larger than those in more affordable areas. The average site size for schemes in areas where affordability is below the national average is 1,834 dwellings. For those delivered in areas where the affordability is greater than the national average, average site size is 2,145 dwellings. So, it is possible that the size of site – rather than affordability *per se* – is a factor here.

Do sites on greenfield land deliver more quickly?

The first edition of this research showed that greenfield sites on average delivered quicker than their brownfield counterparts. In our updated analysis this remains the case; large greenfield sites in our sample built out a third faster than large brownfield sites.

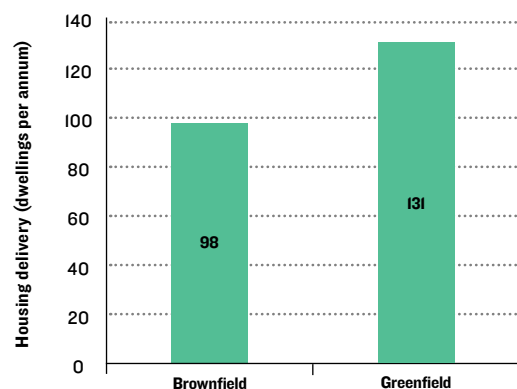
In the life cycle of a site, our data also shows that greenfield sites had shorter planning to delivery periods (2.0 years compared to 2.3 for brownfield sites), although on average, longer planning approval periods (5.1 years compared to 4.6 for brownfield sites).

Figure 11: Build-out rates by level of demand using national median 2018 workplace based affordability ratio (dpa)



Source: Lichfields analysis

Figure 12: Build-out rates on brownfield and greenfield sites (dpa)



Source: Lichfields analysis

Housing mix and variety

Among the more topical issues surrounding delivery rates on large-scale sites is the variety of housing on offer. The Letwin Review posited that increasing the diversity of dwellings on large sites in areas of high housing demand would help achieve a greater rate of build out. The report concluded that a variety of housing is likely to appeal to a wider, complementary range of potential customers which in turn would mean a greater absorption rate of housing by the local market.

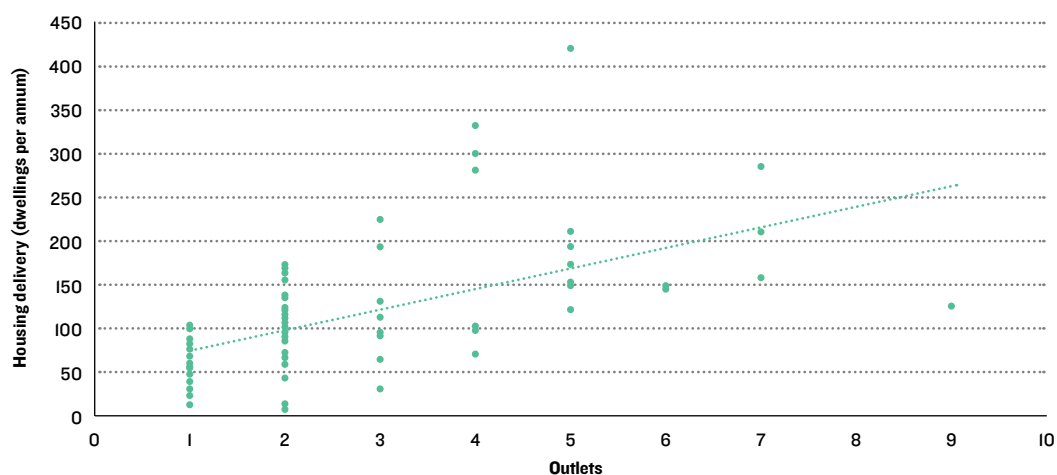
Consistent data on the mix of sizes, types and prices of homes built out on any given site is difficult to source, so we have used the number of sales outlets on a site as a proxy for variety of product. This gives the prospect of multiple house builders each seeking to build and sell homes for which there is demand in the face of 'competing' supply from other outlets (as revealed by the case study of Land South of the M4 in Wokingham). Letwin stated that "...it seems extraordinarily likely that the presence of more variety in these aesthetic characteristics would create more, separate markets"⁷. Clearly, it is likely that on many sites, competing builders may focus on a similar type of product, for example three or four bed family housing, but even across similar types of dwelling, there will be differences (in configuration, design, specification) that mean one product may be attractive to a purchaser in the way another might

not be. On this basis, we use the outlets metric as a proxy for variation. Based on the limited data available for this analysis, if two phases are being built out at the same time by the same housebuilder (e.g. two concurrent parcels by Bovis) this has been counted as one outlet with the assumption there is little variety (although it is clear that some builders may in reality differentiate their products on the same site). This data was derived from sites in a relatively small number of local planning authorities who publish information relating to outlets on site. It therefore represents a small sample of just 12 sites, albeit over many different years in which the number of outlets varied on the same site, giving a total of 80 data points i.e. individual delivery rates and number of outlets to compare.

Our analysis confirms that having more outlets operating at the same time will on average have a positive impact on build-out rates, as shown in Figure 13. However, there are limits to this, likely to be due to additional capacity from the outlets themselves as well as competition for buyers.

On a site-by-site basis, the average number of outlets open over the site's entire delivery lifetime had a fairly strong correlation with annual delivery, both as a percentage of total dwellings and in absolute terms, with a greater number of outlets contributing to higher levels of delivery. However, the completions per outlet did reduce with every additional outlet operating in that year.⁸

Figure 13: Build-out rates by number of outlets present (dpa)



Source: Lichfields analysis



Having more outlets operating at the same time will on average quicken build-out rates.

⁷ Letwin Review draft analysis report (June 2018) - final bullet of para 4.25

⁸ Average completions per outlet on site with one outlet was 61dpa, dropping to 51dpa for two outlets and 45dpa for three outlets.

Geography and Site Configuration

An under-explored aspect of large-scale site delivery is the physical opportunity on site. For example, some schemes lend themselves to simultaneous build out of phases which can have the impact of boosting delivery rates in that year, for example, by having access points from two alternative ends of the site. Other sites may be reliant on one key piece of infrastructure which make this opportunity less likely or impractical. In the first edition of this research we touched on this point in relation to Eastern Expansion Area (Broughton Gate & Brooklands) of Milton Keynes. As is widely recognised, the planning and delivery of housing in Milton Keynes is distinct from almost all the sites considered in this research as serviced parcels with the roads already provided were delivered as part of the Milton Keynes delivery model. Multiple house builders were able to proceed straight onto the site and commence delivery on different serviced parcels, with monitoring data from Milton

Keynes Council suggesting an average of c.12 parcels were active across the build period. In this second edition of this research the Milton Keynes examples remain some of the sites with the highest annual build-out rates.

Table 7: Parcels at Land South of M4, Wokingham

Parcel reference	Developers (active outlets)	Completions in 2017/18
SP1	Bellway (1)	59
SP2w	Bellway and Bovis (-)	None - parcel completed
SP3	Crest Nicholson (1)	47
SP4	Taylor Wimpey and David Wilson Homes (2)	140
SP9_I	Bloor, Bovis and Linden (3)	169
SP10	Darcliff Homes (-)	None - parcel completed
SP11	Taylor Wimpey (1)	4

Source: Lichfields analysis

Figure 14: Map of parcels at Land South of M4, Wokingham



Source: © Google Earth 2020/ Wokingham Local Plan

In this edition we look at the case study of Land South of the M4 in Wokingham. In 2017/18 the site achieved a significant 419 completions. Using the local authority's granular recording of delivery on the site to date, we have been able to consider where these completions were coming forward from within the wider 2,605 dwelling scheme. As shown in Figure 14, in that year new homes were completed on five separate parcels with completions ranging from 4 to 169 dwellings. On some of these parcels (SP9_1 and SP4) there were two or three separate housebuilders building out, and in total on the site there were seven different house building companies active (the impact of multiple outlets on build-out rates is explored later in this report). The parcels are located in separate parts of the site and each had their own road frontages and access arrangements which meant they are able to come forward in parallel. This can enable an increased build rate.

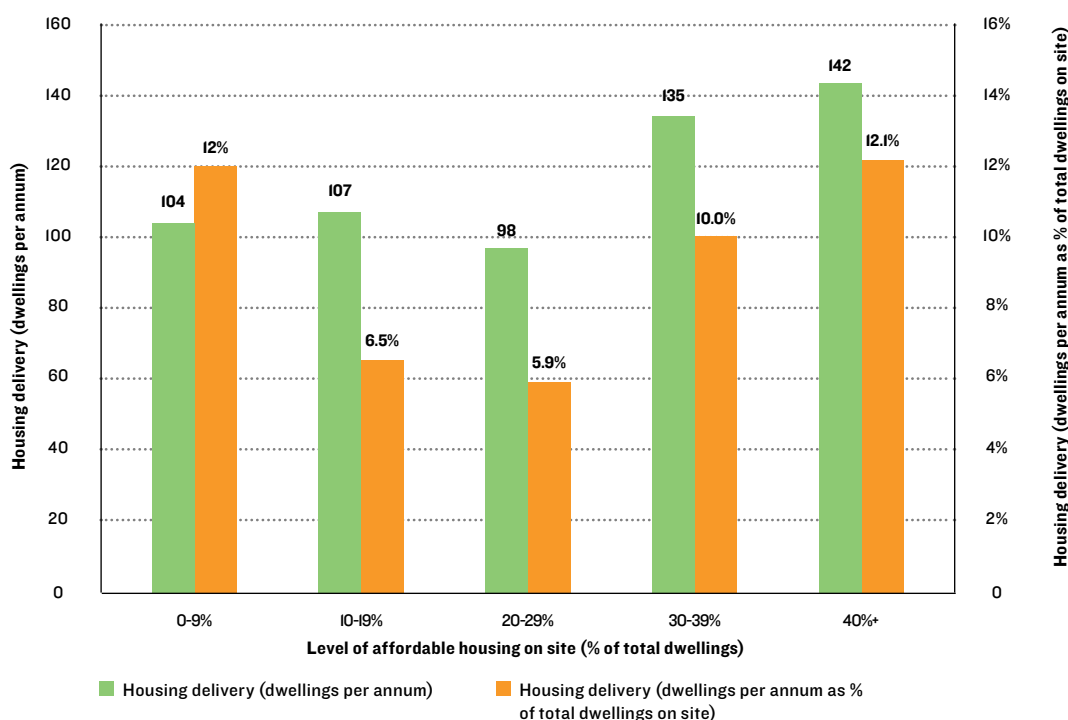
Affordable choices: do different tenures provide more demand?

Our findings on tenure, another form of 'variety' in terms of house building products, are informed by data that is available on about half the sites in our large site sample. From this the analysis shows schemes with more affordable housing built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all dwellings on site. However this is not always the case. Schemes with 20-29% affordable housing had the lowest build-out rates, both in terms of dwellings and proportionate to their size.



Schemes with more affordable housing built out at close to twice the rates as those with lower levels.

Figure 15: Build-out rates by level of affordable housing (dpa and percentage)



Source: Lichfields analysis

06

Conclusions

Recent changes to national planning policy emphasise the importance of having a realistic expectation of delivery on large-scale housing sites, whilst local authorities now find themselves subject to both forward and backward-looking housing delivery performance measures. A number of local plans have hit troubles because they over-estimated the yield from some of their proposed allocations. Meanwhile, it is no longer sufficient for a 5YHLS to look good on paper; the Housing Delivery Test means there are consequences if it fails to convert into homes built.

To ensure local authorities are prepared for these tests, plan making and the work involved in maintaining housing land supply must be driven by realistic and flexible housing trajectories, based on evidence and the specific characteristics of individual sites and local markets. For local authorities to deliver housing in a manner which is truly plan-led, this is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and being realistic about how fast they will deliver so supply is maintained throughout the plan period. Equally, recognising the ambition and benefits of more rapid build out on large sites, it may mean a greater focus on how such sites are developed.

Our research provides those in the public and private sector with a series of real-world benchmarks in this complex area of planning for large scale housing, which can be particularly

helpful in locations where there is little recent experience of such strategic developments. Whilst we present some statistical averages, the real relevance of our findings is that there are likely to be many factors which affect lead-in times and build-out rates, and that these - alongside the characteristics of individual sites - need to be considered carefully by local authorities relying on large sites to deliver planned housing.

In too many local plans and 5YHLS cases, there is insufficient evidence for how large sites are treated in housing trajectories. This research seeks to fill the gap with some benchmark figures - which can be of some assistance where there is limited or no local evidence. But the average derived from our analysis are not intended to be definitive and are no alternative to having a robust, bottom-up justification for the delivery trajectory of any given site. It is clear from our analysis that some sites start and deliver more quickly than the average, whilst others have delivered much more slowly. Every site is different. Therefore, whilst the averages observed in this research may be a good starting point, there are a number of key questions to consider when estimating delivery on large housing sites, based around the three key elements in the three-tier analytical framework at Figure 16.

Key findings:

1 Large schemes can take 5+ years to start

In developing a local plan, but especially in calculating a 5YHLS position, it is important to factor in a realistic planning approval period dependent on the size of the site. Our research shows that if a scheme of more than 500 dwellings has an outline permission, then the average time to deliver its first home is two or three years. However, from the date at which an outline application is validated it can be 5.0 - 8.4 years for the first home to be delivered dependent on the size of the site. In these circumstances, such sites would make no contribution to completions in the first five years.

2 Lead-in times jumped post-recession

Whilst attention and evidence gathering is often focused on how long it takes to get planning permission, the planning to delivery period from gaining permission to building the first house has also been increasing. Our research shows that the planning to delivery period for large sites completed since 2007/08 has jumped compared to those where the first completion came before 2007/08. This is a key area where improvements could be sought on timeliness and in streamlining pre-commencement conditions, but is also likely impacted by a number of macro factors including the recession and reductions in local authority planning resources.

3 Large greenfield sites deliver quicker

Large sites can deliver more homes per year over a longer time period, with this seeming to ramp up beyond year five of the development on sites of 2,000+ units. However, on average these longer-term sites also have longer lead-in times. Therefore, short term boosts in supply, where needed, are likely to also require a good mix of smaller sites. Furthermore, large scale greenfield sites deliver at a quicker rate than their brownfield equivalents: the average rate of build out for greenfield sites in our sample was 34% greater than the equivalent figure for those on brownfield land. In most locations, a good mix of types of site will therefore be required.

4 Outlets and tenure matter

Our analysis suggests that having additional outlets on site has a positive impact on build out rates, although there is not a linear relationship. Interestingly, we also found that schemes with more affordable housing (more than 30%) built out at close to twice the rate as those with lower levels of affordable housing as a percentage of all units on site, but those with 20-29% had the lowest rates of all. Local plans should reflect that – where viable – higher rates of affordable housing supports greater rates of delivery. This principle is also likely to apply to other sectors that complement market housing for sale, such as build to rent and self-build (where there is demand).

Figure I6: Key questions for assessing large site build-out rates and delivery timelines



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Appendix 1: Definitions and notes

The 'lead in'

Measures the period up to first completion of a house on site from the validation date of the first planning application made for the scheme. The lead-in time covers both the planning approval period and planning to delivery periods set out below. The lead-in time does also include the date of the first formal identification of the site as a potential housing allocation (e.g. in a LPA policy document), but consistent data on this for the sample is not available.

The 'planning period'

Measured from the validation date of the first application for the proposed development (be that an outline, full or hybrid application). The end date is the decision date of the first detailed application which permits the development of dwellings on site (this may be a full or hybrid application or the first reserved matters approval which includes details for housing). A measurement based on a detailed 'consent' was considered reasonable and proportionate milestone for 'planning' in the context of this research.

The 'planning to delivery period'

Includes the discharge of any pre-commencement and any opening up works required to deliver the site. It finishes on completion of the first dwelling.

The date of the 'first housing completion'

On site (the month and year) is used where the data is available. However, in most instances the monitoring year of the first completion is all that is available and in these cases a mid-point of the monitoring period (1st October, falling halfway between 1st April and the following 31st March) is used.

The 'annual build-out rate'

Each site is taken or inferred from a number of sources. This includes Annual Monitoring Reports (AMR's) and other planning evidence base documents produced by local authorities (see footnote 1), contacting the local planning authority monitoring officers or planners and in a handful of instances obtaining the information from housebuilders.

Due to the varying ages of the assessed sites, the implementation of some schemes was more advanced than others and, as a function of the desk-based nature of the research and the age of some of the sites assessed, there have been some data limitations, which means there is not a complete data set for every assessed site. For example, lead-in time information prior to submission of planning applications is not available for the vast majority of sites. And because not all of the sites assessed have commenced housing delivery, build-out rate information is not universal. The results are presented accordingly.

Sources for sites also found in the Letwin Review

Arborfield Green (Arborfield Garrison)	Five Year Housing Land Supply Statement and appendix on Strategic Development Locations at 31st March 2018 published 9th October 2018 http://www.wokingham.gov.uk/planning-policy/planning-policy-information/evidence-topics/
Ledsham Garden Village	Various Housing Land Monitor Reports https://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/mon/
Great Kneighton (Clay Farm)	Partly provided by Cambridgeshire County Council and included in numerous AMR's https://www.cambridge.gov.uk/annual-monitoring-reports
Trumpington Meadows	Included in numerous AMR's for Cambridge and South Cambridgeshire (site crosses boundaries) https://www.cambridge.gov.uk/annual-monitoring-reports and https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/annual-monitoring-report/
Graven Hill	Various Annual monitoring reports https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports
South West Bicester (Kingsmere Phase I)	Various Annual monitoring reports https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports
Great Western Park	Housing Land Supply Statement April 2018 http://www.southoxon.gov.uk/sites/default/files/30.04.2018%20Housing%20Land%20Supply%20Statement%20FINAL%20(2)%20combined.pdf
Ebbsfleet:	First phase at Springhead Park and Northfleet South from Gravesham AMR's 2009/10 to 2012/13
2009-10:	127 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69823/AMR2010.pdf
2010-11:	79 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/69814/AMR2011.pdf
2011-12:	55 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0009/92448/Gravesham-Authority-Monitoring-Report-2011-12-May-2013.pdf
2012-13:	50 completions https://www.gravesham.gov.uk/__data/assets/pdf_file/0010/92449/Gravesham-Authority-Monitoring-Report-2012-13-interim-May-2013.pdf
2013/14:	87 dwellings, based on total completions from Gravesham to 2012/13 of 311 and total completions to the start of 2014/15 in the Ebbsfleet Garden City Latest Starts and Completion Figures totalling 398.
2014/15 to 2017/18:	Ebbsfleet Garden City Latest Starts and Completion Figures: https://ebbsfleetdc.org.uk/tracking-our-performance/

Appendix 3:

Small sites tables

Site Name	Local Planning Authority	Size
Cookridge Hospital	Leeds	495
Stenson Fields	South Derbyshire	487
Horfield Estate Phase I	Bristol City Council	485
Farnborough Business Park	Rushmoor	476
Bickershaw Colliery	Wigan	471
Farington Park, east of Wheelton Lane	South Ribble	468
Bleach Green	Gateshead	456
Kingsmead South	Milton Keynes Council	450
New Central	Woking Borough Council	445
Land at former Battle Hospital	Reading Borough Council	434
New World House	Warrington	426
Radyr Sidings	Cardiff	421
Luneside West	Lancaster	403
Woolley Edge Park	Wakefield	375
Former Masons Cerement Works and Adjoining Ministry of Defence Land	Mid Suffolk	365
Former NCB Workshops (Portland Park)	Northumberland	357
Chatham Street Car Park Complex	Reading	307
Kennet Island Phase I - H, M, T, U1, U2	Reading	303
Land at Dorian Road	Bristol, City of	300
Land at Fire Service College, London Road	Cotswold	299
Land at Badsey Road	Wychavon	298
Land at Brookwood Farm	Woking	297
Long Marston Storage Depot Phase I	Stratford-on-Avon	284
M & G Sports Ground, Golden Yolk and Middle Farm	Tewkesbury	273
Land at Canons Marsh	Bristol, City of	272
Land off Henthorn Road	Ribble Valley	270
Land Between A419 And A417	Cotswold	270
Hortham Hospital	South Gloucestershire	270

Site Name	Local Planning Authority	Size
GCHQ Oakley - Phase I	Cheltenham	262
Hewlett Packard (Land Adjacent To Romney House)	Bristol, City of	242
I28-134 Bridge Road And Nos 1 - 4 Oldfield Road	Windsor and Maidenhead	242
Hoval Ltd North Gate	Newark and Sherwood	196
Notcutts Nursery, I50 - I52 London Road	Cherwell	182
Sellars Farm	Stroud	176
Land South of Inervet Campus Off Brickhill Street, Walton, Milton Keynes	Milton Keynes	176
Queen Mary School	Fylde	169
London Road/ Adj. St Francis Close	East Hertfordshire	149
Land off Gallamore Lane	West Lindsey	149
Doxey Road	Stafford	145
Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	145
Bracken Park, Land At Corringham Road	West Lindsey	141
Land at Farnham Hospital	Waverley	134
North of Douglas Road	South Gloucestershire	131
Land to the east of Efflinch Lane	East Staffordshire	130
Land to the rear of Mount Pleasant	Cheshire West and Chester	127
Primrose Mill Site	Ribble Valley	126
Kennet Island Phase IB - E, F, O & Q	Reading	125
Land between Godsey Lane and Towngate East	South Kesteven	120
Bibby Scientific Ltd	Stafford	120
Land west of Birchwood Road	Bristol, City of	119
Former Bewbush Leisure Centre Site	Crawley	112
Land south of Station Road	East Hertfordshire	111
Poppy Meadow	Stratford-on-Avon	106
Weeton Road/Fleetwood Road	Fylde	106
Former York Trailers (two schemes - one Barratt, one DWH)	Hambleton	96
North East Sandylands	South Lakeland	94

Site Name	Local Planning Authority	Size
Auction Mart	South Lakeland	94
Parcel 4 Gloucester Business Park	Tewkesbury	94
York Road	Hambleton	93
Land At Green Road - Reading College	Reading	93
Caistor Road	West Lindsey	89
The Kylins	Northumberland	88
North East Area Professional Centre, Furnace Drive	Crawley	76
Land at Willoughbys Bank	Northumberland	76
Watermead, Land At Kennel Lane	Tewkesbury	72
Land to the North of Walk Mill Drive	Wychavon	71
Hawthorn Croft (Off Hawthorn Avenue Old Slaughterhouse Site)	West Lindsey	69
Land off Crown Lane	Wychavon	68
Former Wensleydale School	Northumberland	68
Land at Lintham Drive	South Gloucestershire	68
Springfield Road	South Kesteven	67
Land off Cirencester Rd	Stroud	66
Land south of Pinchington Lane	West Berkshire	64
Land at Prudhoe Hospital	Northumberland	60
Oxfordshire County Council Highways Depot	Cherwell	60
Clewborough House School	Cherwell	60
Land at the Beacon, Tilford Road	Waverley	59
Land to Rear Of 28 - 34 Bedale Road	Hambleton	59
Hanwell Fields Development	Cherwell	59
Fenton Grange	Northumberland	54
Former Downend Lower School	South Gloucestershire	52
Holme Farm, Carleton Road	Wakefield	50
Land off Elizabeth Close	West Lindsey	50

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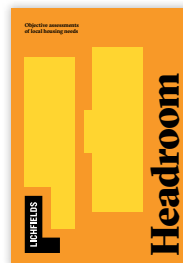
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headley, andrew

From: [REDACTED]
Sent: 19 September 2023 10:07
To: futuremedway
Subject: Hoo infrastructure

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

Hi There

We have had a caravan in AllHallows for 10 years

We moved to chattenden in June 2022 [REDACTED]
[REDACTED]
[REDACTED]

Our houses are tucked away out of site above Hoo common , we love it , we feel so lucky to have found / purchased / & live in our house

My worry is that land we used to see whilst visiting our caravan over the last 10 years is slowing vanishing , I'm not against new builds ! We own one and could be considered as "not wanted" a vibe that is very noticeable in the Hoo area , I kind of agree with this, Hoo along stoke road has taken a direct hit of new homes , that being Taylor Wimpy Homes

It's all a complete overload of unflattering houses squashed together ruining what was once a great view

Jones & Jones have also built houses on the other side of the road right up to were the horse graze , these houses are not as imposing and are better houses

Esquire are now building a small development near the Bradford Garage along Sharnell Road , I personally would not live there as the road is very busy and has many lorry's passing along there , i hear they might be building more past the roundabout on the same side .

This is all well and good for our future generations but youngsters can't afford to buy them and I mean afford to buy any property, we need homes that our youngsters can afford to rent and i don't mean privately rent , bring back council houses that they maybe in years to come buy, not just Medway , everywhere for those who can prove their worth by paying their rent on time , keep in employment and are worthy of getting on the owners ladder.

The major problem with developers rubbing their hands together licking their lips at all the beautiful open green land on the Peninsula is that there is only "ONE" road in and "ONE" road out

Need I say more , I don't need to say anymore , what more can be said !

It's not doable, justifiable, it's wrong .

Maybe a bridge from grain / kingsnorth in the other direct might help , like the one on Sheppy that was built

Thank you for reading my views

Kind regards



[Sent from the all-new AOL app for iOS](#)

headley, andrew

From: [REDACTED]
Sent: 20 October 2023 16:13
To: futuremedway
Subject: Hoo peninsula

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

Dear Sir,

Having seen the proposed new Local Plan presentation at Hoo School last night (19-10-2023) I could not see any mention of new utility supplies eg water, sewage, power etc. There have been hundreds of new houses built in the parish of Hoo in the last 15 years but there has been a total absence of any new infrastructure. It would appear that each new development has been attached to the existing utilities in a fashion similar to joining on by means of an extension lead.

Where and when are the new utilities, infrastructure, healthcare facilities, schooling and transport problems going to be addressed as there were no answers visible last night ?

[REDACTED]

headley, andrew

From: Bill McLennan [REDACTED]
Sent: 31 October 2023 11:19
To: futuremedway
Subject: Local Plan 2040 Regulation 18 comment submission.

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

After watching the video and reading the submission instructions I registered on line to submit comments and receive updates.

However, after logging in and trying to submit a comment the system does not seem to register the comment to my account. It is very confusing.

To ensure my comment has been received by the close of comment 11:59pm Oct 31, I thought it best to send it via this email.

I would be grateful if the below comment could be registered and made public.

Thank you for your help in this matter.

Bill McLennan.

Bill McLennan - Medway Local Plan 2040 comment Oct 31 2023.

Aviation Policy.

The 2040 Local Plan should not contain any safe guarding for Rochester Airport.

The adopted 2003 Medway Local Plan carefully outlines the continuation of airport operations in terms of environmental and social criteria post land recovery for a Technology Park.

The plan does not guarantee the continuation of flying at the site and had it done so, it would have severely limited the Councils recent land development options.

The Council as the owner of the airfield land has a fiduciary responsibility to ensure value for money from the asset, but further, not jeopardise or knowingly undermine the value of the land in terms of future development, financial return or on-going public purse liability.

Safe guarding of Rochester airport in the 2040 local plan will not only be reckless and irresponsible from a futures land use perspective but, offer negotiating leverage to a commercial airport operator in lowering lease payments or demanding Council subsidy should the enterprise falter or fail.

The safe guarding of Rochester Airport is unarguably tantamount to protecting and possibly subsidising a privately owned commercial business to the detriment of the public purse and people of Medway.

Any future use of the airfield land, in the event flying from the site becomes financially unviable or operationally dangerous must be determined unencumbered by Local Plan protection.

The closure of Rochester Airport and airfield land reallocation to non-flying activity would not stop recreational flying in Medway.

It may be convenient for the author of the draft plan to discount Stoke airfield's potential for recreational and commercial flying due to nearby electricity pylons but the Civil Aviation Authority would not licence the airfield if it were dangerous.

Equally the CAA continues to licence Rochester Airport despite its remaining runway pointing directly at, and only metres from, a busy eight lane wide motorway and Highspeed EuroStar rail line.

The Stoke airfield has good transport access and well away from densely populated residential areas.

Medway's second aerodrome would allow the area to continue to promote safe commercial, private and club flying should Rochester Airport become unviable or dangerous.

Any statement in the Local plan on the limitations of Stoke Airfield to support Medway aero club members is speculative at best and prejudicial to alternative options for flying in Medway.

Any suggestion or statement in the 2040 Local Plan safe guarding Rochester airport based on the need of the Air Ambulance is also factually incorrect.

The former CEO Adrian Bell of the Kent, Surrey and Sussex Air Ambulance Service (KSSAAS) wrote, "We currently operate perfectly satisfactorily and safely at Rochester with both runways in existence; that would not change if only one runway was to remain or indeed no runways at all." Additionally, he stated "The Trust has no intention of relocating its operational base to Rochester."

Prior to returning to Rochester the KSSAAS Trust operated from an Industrial Estate.

There is no legitimate argument or factual basis for a statement in the Local Plan which legitimises safeguarding of Rochester Airport due to the presence of the KSSAAS.

The current 2003 Local Plan sensibly does not safeguard the airfield or guarantee the continuation of an airport at the site to avoid future environmental issues and financial liabilities for the public purse.

There is no recent public mandate or consultation for the inclusion of any safeguarding for Rochester airport.

Medway Council's physical leased asset will not be lost if the airport operator fails and therefore does not require Local Plan protection.

Any future use of the airfield land should not be restricted by the 2040 Local Plan, nor decided by councilor favouritism or individual interest but by democratic and open public consultation at a time when a decision is needed.

No safeguarding of Rochester Airport should be contained in the Medway 2040 Local Plan.

Thank you for your consideration in this matter.

Draft Medway Local Plan Regulation 18 Issues and Options Consultation

Land at Pilgrims Road and Vicarage Road,
Halling

Draft Medway Local Plan Regulation 18 Issues and Options Consultation

Land at Pilgrims Road and Vicarage Road, Halling



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Draft Medway Local Plan Regulation 18 Issues and Options Consultation

Land at Pilgrims Road and Vicarage Road, Halling



1. Introduction

- 1.1. Savills have been instructed by the Diocese of Rochester (“DoR”) to prepare representations to the Draft Medway Council Regulation 18 Consultation. The consultation on the Local Plan commenced on the 18th September and closes on the 31st October 2023.
- 1.2. These representations focus on 2 parcels of land within the Ownership of the Diocese - Land at Pilgrims Road, Halling and Land at Vicarage Road, Halling (herein referred to as ‘**the Sites**’).
- 1.3. The Sites have previously been submitted to Medway Council as part of the Call for Sites, most recently in January 2023, and are identified within the Medway Land Availability Assessment (September 2023), which forms part of the evidence base for the emerging Local Plan (*Land at Pilgrims Road- Site ID: CHR2, Land at Vicarage Road, Halling - Site ID: CHR5*).
- 1.4. The Sites were also promoted through the previous iteration of the Local Plan. These representations were made to the Medway Council Development Options Consultation on the Emerging Medway Local Plan “Future Medway” which closed on 18/04/2017.
- 1.5. The National Planning Policy Framework (NPPF) explains that the planning system should be plan-led, and Paragraph 34 of the Planning Practice Guidance (PPG) states that there is considerable flexibility open to local planning authorities in how they carry out the initial stages of local plan production, provided they comply with the specific requirements in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, (‘the Local Plan Regulations’) including the need to notify relevant stakeholders of the consultation and their opportunity to make representation.
- 1.6. At examination, a Plan will be found ‘sound’ if it is considered to be positively prepared, justified, effective and consistent with national policy, as set out within Paragraph 35 of the NPPF. As such, ensuring that the Local Plan meets the tests of soundness is important throughout the Local Plan process. The comments made within these representations are to support Medway Council in preparing a sound plan.
- 1.7. As part of this Draft Local Plan consultation, Medway has published an evidence base comprising a number of supporting documents. We have made comments on three documents as part of this representation. These documents are listed below.
 - **Medway Local Plan Reg. 18 Consultation Document (September 2023)**
 - **Land Availability Assessment (LAA) published with this consultation document.**
 - **Medway Green Belt Review (December 2018)**

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Land at Pilgrims Road and Vicarage Road, Halling



Background to the Diocese of Rochester

- 1.8. DoR is one of 41 dioceses of the Church of England, and was established by St Augustine in 604AD. Geographically, the Diocese covers North and West Kent and the London Boroughs of Bromley and Bexley and comprises 2016 parishes with 239 churches serving a population of around 1.3 million. The DoR is a landowner with a land portfolio that extends across Medway and Kent.

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Land at Pilgrims Road and Vicarage Road, Halling



2. The Sites

Context

- 2.1. The two Sites are each located to the west of the village of Halling (Figure 1).
- 2.2. Halling is a large village (population 2,821, 2011 census) located to the Southwest of the Medway Council area. The A228 cuts through the village, the centre is focussed along the High Street, situated to the east of the A228 and which lies broadly on a north to south alignment, with the River Medway beyond. Halling train station, and its associated car parking areas lie to the east of the High Street and provides frequent services to Strood and Maidstone.
- 2.3. The village also contains a number of shops and services which serve residents:
 - The Church of Saint John the Baptist
 - Public houses (Homeward Bound and Five Bells);
 - A community centre;
 - A local shop; and
 - A petrol station;
- 2.4. Beyond the settled areas, the landscape comprises quarries and pits set aside arable farmland, woodland and salt marshes. The former chalk quarry is a dominant and substantial man-made topographical feature which is cut into the hillside to the north and northwest of the village. St Andrew's Lake within part of the former quarry is situated at the bottom of the cutting.

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Land at Pilgrims Road and Vicarage Road, Halling



Figure 1: Approximate Site Boundaries



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Land at Pilgrims Road and Vicarage Road, Halling

Land at Pilgrims Road

- 2.5. Land at Pilgrims Road is a single rectangular shaped open parcel of agricultural land (grade 3 and 4), to the west of Halling. The parcel occupies an area of around 3.04ha. The Site lies on an east facing hillside with St Andrews Lake and associated watersports centre at the base of the Hill (Figure 2).
- 2.6. The St Andrews Park housing development is located around 300m to the East, with the wider settlement of Halling beyond this to the south.
- 2.7. The Site is defined by an area of woodland to the South, West and North. A row of residential dwellings is located to the East.
- 2.8. The Site is not located within the Village boundary and is located within the Kent Downs Area of Outstanding Natural Beauty (AONB), Metropolitan Green Belt and local Area of Local Landscape Importance, as indicated on the adopted Local Plan policy maps.

Figure 2: Pilgrims Road, Site Plan



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Plotted Scale - 1:5000. Paper Size - A4

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Land at Pilgrims Road and Vicarage Road, Halling

Land to the North of Vicarage Road

- 2.9. The 0.5ha parcel lies on a south facing hillside, which forms part of the landform which frames the western area of Halling. The Site comprises a small area of open land fronting Vicarage Road, alongside a small, wooded area beyond this (Figure 3).
- 2.10. The Site is not within the village boundary of Halling, however lies adjacent to existing residential development on its southern and eastern sides. The Site is currently located within the Green Belt.
- 2.11. A pre-application submission was made to Medway Council in 2018 for the construction of 9 houses (Ref PRE18/1288). This detailed that a proposed scheme “*is unlikely to be acceptable in principle due to the impact on the green belt. Furthermore, it considers: “as it is outside the village confines it is unlikely to be considered acceptable as an infill development”.*

Figure 3: Land at Vicarage Road, Site Plan.



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Land at Pilgrims Road and Vicarage Road, Halling



3. Comments on Regulation 18 Local Plan

- 3.1. It is noted that the Regulation 18 Local Plan comprises a high-level plan for Medway's growth. The Regulation 18 Local Plan has been published for consultation after Medway Council was forced to revert back to the Regulation 18 stage of the Local Plan preparation in August 2022, after it failed to reach a political consensus on the proposed spatial strategy including locations for residential growth.
- 3.2. It is noted that the consultation does not detail policies or identify those sites preferred by the Council for new development, and instead requests comment on the Land Availability Assessment, four Strategic Objectives, and potential Spatial Strategies. These representations comment where relevant to this Site.

Land Availability Assessment (LAA)

- 3.3. Stage 1 of the LAA has been undertaken and the September 2023 LAA document indicates that Stage 2 is underway which involves estimating the development potential and an assessment as to the suitability, availability and achievability of each site before considering whether constraints are capable of being mitigated.
- 3.4. It is noted that the LAA does not comment on the suitability of the sites at this stage, however, does outline the availability of sites in the Medway area.
- 3.5. It is noted that the two aforementioned Sites, were submitted to the Call for Site's in January 2023. Pilgrims Road is identified as Site ID CHR2 and Vicarage Road as Site ID: CHR5 and the information submitted about the Sites can be found in the LAA.

Strategic Objectives Set Out in the Consultation Document

- 3.6. Medway Council sets out four strategic objectives which are stated to plan positively for the development and infrastructure that the area needs, whilst also conserving and enhancing the natural, built and historic environment. These will form the backbone to the Local Plan and the Policies within it.
- 3.7. The four strategic objectives are outlined below. Due to the broad nature of the objectives, there is no detail as to how these objectives will be achieved at this stage, and therefore this cannot be commented on.

Strategic Objective 1 - Prepared for a sustainable and green future.

- 3.8. This objective focuses on the Council's commitment to addressing the Climate Emergency. It will provide adaptations and mitigation measures, including opportunities to promote carbon reduction and support the transition to 'zero carbon'.
- 3.9. An emphasis is also placed on sustainable travel, promoting transport networks providing safe and effective choices for sustainable travel, including improved opportunities for walking and cycling.

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3.10. Strategic Objective 1 is in accordance with chapter 14 of the NPPF and in particular paragraph 152 which details “*The planning system should support the transition to a low carbon future in a changing climate*”. Strategic Objective 1 also aligns with the DoRs “*Called Together Priority*” to which aims to protect creations life for future generations, and to work for the protection of the natural world, and the DoRs Annual Report¹ 2022 details the measures that the DoR is undertaking to achieve Net Zero across its estate. That Medway Council supports such aims is therefore of the utmost importance to the DoR and its inclusion at the backbone of the Local Plan is supported.

Strategic Objective 2 - Supporting people to lead healthy lives and strengthening our communities.

3.11. Strategic Objective 2 aims to create a strong and healthy community through ensuring the provision of high quality, energy efficient homes that meet the housing needs of Medway’s communities.

3.12. Strategic Objective 2 also aims to: “*reduce inequalities in health and deliver better outcomes for residents, by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public realm*”.

3.13. Strategic Objective 2 would support the Government’s ambitious new Environmental Improvement Plan for England (January 2023)² which sets a target for every household in England to be within 15 minutes of greenspace or water, and the ability to access and enjoy nature close to home is proven to help increase health and wellbeing for communities, and is recognised within the DoRs Vision Statement 2022 which details: “*From healthy walks and mobility exercise sessions to cycling groups and sports club chaplains, churches across the Diocese are being creative in showing how they can be a positive and encouraging presence in people’s sporting lives*”.

3.14. The provision of a strong, healthy and engaged community lies at the overarching heart of the DoRs five priorities and the Diocese welcomes its inclusion as forming part of the Local Plan.

¹ <https://d3hgrlq6yacptf.cloudfront.net/6154babbee922/content/pages/documents/diocese-of-rochester---accounts-2022---signed.pdf>

² <https://deframedia.blog.gov.uk/2023/02/03/environmental-improvement-plan-outlines-ambition-to-create-greener-and-cleaner-country/>

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Strategic Objective 3 - Securing jobs and developing skills for a competitive economy.

- 3.15. Strategic Objective 3 aims to provide a high achieving local economy that benefits from the provision of high-quality employment land that meets the needs of businesses alongside a highly skilled workforce. The Objective aims to: *“improve the skills of the local workforce”* and *“to gain recognition of Medway as a centre for learning”*.
- 3.16. This Objective is clearly aligned and supported by the DoR whom control 89 Schools, providing an education to around 27,000 students between 4 and 19 across Medway, Kent, Bromley and Bexley, with an aim to: *“support children and young people in the deepening of knowledge, to develop an itch for learning, a curiosity in this world that lasts a lifetime”*.

Strategic Objective 4 - Boost pride in Medway through quality and resilient development

- 3.17. The fourth strategic objective is with regards to boosting pride in Medway through good quality effective infrastructure, so that needs of Medway’s growing and changing communities are well served. This includes directing growth to the most suitable locations.
- 3.18. The suitability of the Sites within Halling within the ownership of the DoR, detailed within Section 2 are assessed within the subsequent paragraphs in the context of the wider spatial strategy. In summary, it is clear from this Regulation 18 Plan that Medway will be required to release some Green Belt Land to meet its housing requirements over the next 20 years. The proximity of these Site’s to Public Transport links, existing settlement and their position within the A228 corridor makes them highly suitable for such release.

Developing a Spatial Strategy

Development Needs

- 3.19. The Regulation 18 document acknowledges that the ‘Standard Method’ set out by Government in determining the scale of housing needed over the plan period would warrant a level of housing which is: *“greatly higher than rates of housebuilding seen in Medway for over 30 years”*. This Standard Method formula for Local Housing Need identifies a need for 1,667 homes a year in Medway, or around 28,500 over the plan period to 2040 (Paragraph 5.3).
- 3.20. Medway Council (along with several other LPAs) has raised concerns in Government consultations about the Standard Method (Paragraph 5.2), which would be based on projections from 2014, rather than more recent demographic projections for Medway’s growth. In preparing this response we recognise that there are difficulties in continuing to move forward with plan preparation given the potential changes in policy, with specific regards to the changes that are being proposed to the NPPF. However, the government has not yet released new policy and as such we must proceed on the basis of the published NPPF and guidance.

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- 3.21. Paragraph 5.4 correctly recognises: “*that there is a housing crisis, particularly regarding affordability*”, and identifies there are: “*many existing residents in Medway living in overcrowded and/or substandard conditions which is unhealthy or living at home with parents well into their late 30’s because they simply cannot afford to live independently in the area they wish to continue to live*”.
- 3.22. It is difficult to state whether the Council’s approach is sound as the policy provides little indication as to the level of housing the Council are proposing to deliver over the plan, or the allocations it considers necessary and of the capacity to support delivery, noting that The Council is collating a “*comprehensive evidence base*”, with all potential sites being assessed (paragraph 5.6). However, key to the soundness of this policy, and the plan in general, is that the Council must ensure that it meets its identified housing needs in full determined by national policy.
- 3.23. The DoR suggests that Medway Council seeks to prepare a plan using the Standard Method as per NPPF paragraph 61 that seeks to boost housing and make an efficient use of land. Such an approach would ensure that with regard to the key stumbling block of housing need the plan could be considered sound. Furthermore, whilst The Standard Method and the requirement for the local housing need assessment (Paragraph 61 of the NPPF) may be omitted from the updated NPPF, it is currently still adopted policy, and therefore the plan-making process should follow this process in order to be found sound. The most recent Local Authority Monitoring Report stated the following: “*There has been an increase in the number of planning permissions for dwellings in recent years, but this is still not at a high enough level to deliver the level of identified local housing need.*” It was also acknowledged that greenfield sites were having a positive effect on the number of new homes being built, however this needed to be sustained to increase the rates of delivery and pass the Housing Delivery Test in years to come.

Locations of Growth

- 3.24. Medway Council has identified four broad categories of locations where development could take place, reflecting Medway’s broad geography. Indicative housing capacities based upon Sites submitted from the LAA for the different areas are presented for each category, and noted within Table 3.1 as follows, providing a total indicative capacity of 38,216 homes.

Table 3.1 - Indicative Housing Supply by broad location (source: Regulation 18 document)

Category	Indicative Capacity
Urban Regeneration	11,151 homes;
Suburban Expansion	9,680 homes
Rural Development	14,736 homes
Greenbelt Release	2649 homes
Total	38,216 homes

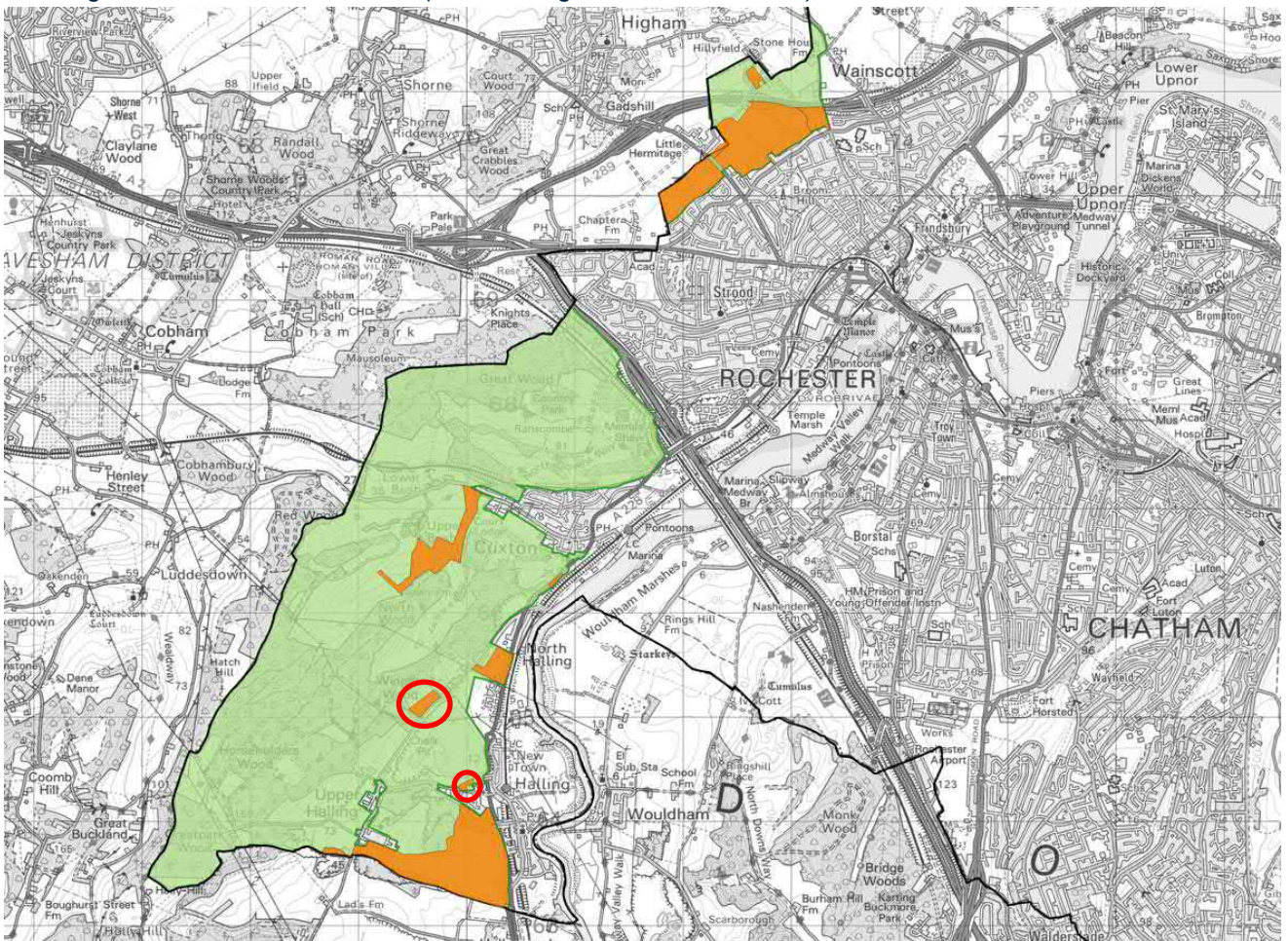
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- 3.25. It is noted that within these four categories, the 'Urban Regeneration' category has the highest potential housing capacity according to the LAA. However, it should be noted that there are often significant constraints on Urban Brownfield Sites, including significant infrastructure costs which can affect the delivery of entire brownfield sites or result in a reduction of benefits such as affordable housing. It is therefore highly unlikely that the identified capacity of 11,151 homes upon such sites will be delivered over the plan period.
- 3.26. The Sites lie within the potential 'Greenbelt release' area of the sites and is highlighted in orange in Figure 4. In the interests of effective and sustainable planning the broad hierarchical approach from urban regeneration towards Greenbelt release is supported. It is clear that Medway lacks the sufficient available land to accommodate all its required growth within existing urban areas and upon suburban sites, which if all sites were developed within the plan period would only deliver a maximum of 20,840 houses, leaving a surplus of around 7,900 houses to be found on sites elsewhere. A detailed, it is unlikely that all such sites will come forward and be developed over the plan period and It is inevitable on this basis that sites for Greenbelt Release should be considered up front within the Local Plan process to ensure that Medway is able to meet its statutory Housing requirements.
- 3.27. The two parcels within the ownership of the DoR are both identified as potential sites for Green Belt Release (Map 4). The DoR supports this position.

Figure 4 – Green Belt Release (source: Regulation 18 document), with DoR Sites circled.



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Land at Pilgrims Road and Vicarage Road, Halling

Suitability of The Sites for Green Belt Release

- 3.28. The Sites are located on the edge of the existing built area, as detailed within Section 2, *Land at Pilgrims Road* is located close to the large St Andrews development and the St Andrews Lakes recreational area, while *Land at Vicarage Road* has a strong relationship with the existing settlement, with residential development on its southern and eastern sides.
- 3.29. Paragraph 138 of the NPPF details that the Green Belt serves five purposes, as listed below;
- a) to check the unrestricted sprawl of large built-up areas;*
 - b) to prevent neighbouring towns merging into one another;*
 - c) to assist in safeguarding the countryside from encroachment;*
 - d) to preserve the setting and special character of historic towns; and*
 - e) to assist in urban regeneration*
- 3.30. The Metropolitan Green Belt in Medway is identified as providing a strategic gap between Stood and Higham and Snodland and Halling, as per the first strategic purpose (Paragraph 5.49). The release of the 2 small parcels within the ownership of the DoR will not undermine the purposes of the Green Belt as identified within paragraph 138 or result in the merger of Snodland and Halling. The Sites proximity to Halling and the former quarry will also assist in regeneration.
- 3.31. Paragraph 142 of the NPPF details
- “Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport”.*
- 3.32. The overall approach of the Regulation 18 Medway Local Plan is considered to be in accordance with Paragraph 142 of the NPPF.
- 3.33. It is also important to consider in the context of Paragraph 142 of the NPPF, that both DoR Sites are within close proximity to Halling Railway Station. A bus stop is located on Vicarage Road opposite the land owned by the DoR. The 151 bus provides also provides regular services from Halling towards Chatham and Strood, and in this context the Sites can be considered to be Sustainably located.
- 3.34. The provision of a modest amount of new residential development upon the Sites will also help the village to reach a point where a larger population helps to support a greater level of local shops and services, which is encouraged by paragraph 79 of the NPPF, as one of the benefits of rural housing.

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3.35. The release of the Sites from the Green Belt for residential development will secure a number of additional benefits, including, but not limited to;

- An opportunity to deliver housing to enable Medway to meet its Housing Targets
- Potential for Ecological and Biodiversity enhancements;
- Potential for the provision of Public Open space to serve the site, and the wider local area.

Medway Green Belt Review (December 2018)

3.36. The Medway Green Belt Review (December 2018) forms part of the emerging local plan evidence base, this document divides the Metropolitan Green Belt within Medway into 5 large assessment areas. The parcels at Halling are located within area 5, whilst the larger parcel is considered to meet the objectives of the Green Belt as part of this review it does not provide an assessment at a more detailed site level and should therefore be revisited to evidentially assess sites for Green Belt release.

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4. Conclusion

- 4.1. These representations have been prepared on behalf of the DoR in relation to the broad objectives of the Emerging Local Plan and its Sites at Pilgrims Road and Vicarage Road, Halling.
- 4.2. Observations on the proposed growth strategies has been provided. The DoR acknowledge that it is likely that the Council will require a mix of the strategies. However, the need to release Green Belt land area should be noted and supported, if Medway is to meets its objectively assessed Housing Need and deliver the high-quality Housing that is required.
- 4.3. It is evident that the ultimate goal of the Medway Regulation 18 document is to achieve sustainable development and this goal is strongly supported by the DoR.
- 4.4. DoR thanks Medway Council for the opportunity to provide comments on their Regulation 18 Local Plan. We reserve the right to comment on any further Local Plan consultation and the published evidence (if required).



St Mary Hoo Parish Council



Planning Department
Medway Council

30 October 2023

Lead on Local plan, Catherine Smith

Dear Catherine

Local Plan Consultation

We write with regards to the above Local Plan Consultation, and our concerns for over-development in the village.

St Mary Hoo is a unique rural area consisting mostly of ribbon development along Ratcliffe Highway and Fenn Street with a small group of houses around the old church and school. The houses are bordered by farmland, orchards and woodland and there is no defined village or rural settlement. The only amenity is The Fenn Bell In which now forms part of the Zoo and Conservation enterprise.

The Parish Council has a duty to represent and articulate the views of the majority or residents, many of whom are retired or work from home. A significant number have moved here to enjoy the rural ambience, the uninterrupted views over our countryside, and to get away from urbanised areas.

It is generally accepted that some growth is needed, provided it maintains or enhances the rural character of the landscape and benefits the vitality of the Community.

The Parish Council has traditionally supported requests for home improvements and extensions by existing residents but has opposed infill, back land and tandem development applications which could lead to encroachment or suburbanization. The principles of Medway's 2003 Local Plan BNE25 and BNE33 have been used as a standard. However, each application should be considered on its own merits and tested environmental issues.

Now that there are plans to increase the number of Peninsula homes by over 14,000, predatory applications for multiple dwellings are likely to increase wherever there is spare land.

Consideration should be given to the effects of additional traffic movements, particularly at peak times. Also, pedestrian and cyclist safety is increasing year on year. The speed of traffic leaving the Fenn Corner Roundabout has been a cause for concern and there have been associated accidents.

St Mary Hoo Parish Council

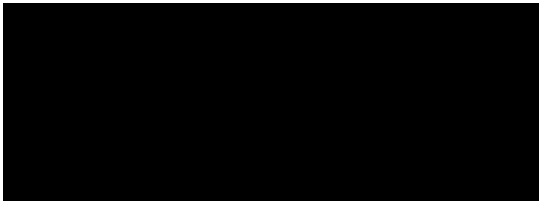


There is copious seasonal traffic caused by the Holiday Park in Allhallows and the Fenn Bell Zoo complex as well as GGVs turning into and out of the Industrial Estate.

There is considerable noise and traffic generated during the groundwork, construction and finishing phases of any development especially longer-term custom-built self-build projects. During eventual occupancy the levels of air, light and noise pollution would increase and add further disturbance to the adjoining residents.

Whilst we have no concerns on the development of the extension, we are still mindful of over-development of properties.

Yours faithfully



Clerk
St Mary Hoo Parish Council

Medway Local Plan 2040

Regulation 18 Response

October 2023

Consultation Response

Halling Parish Council

1.0 Summary

- 1.1 The parish council recognises the need for an up-to-date Local Plan and the previous attempts to adopt a new plan to replace the existing 2003 Local Plan. Across the plan area, the lack of a plan, the need to define a 5-year land supply for housing and a suitable build-out rate has led to a developer-led expansion of housing, without all the required infrastructure development before, during or after the housing provision. Necessary road improvements to cater for this growth have been slow to respond. All this at a time when there has been more pressure on medical service provision with a move away from face-to-face appointments to online and phone contact that is not suitable for many residents has not demonstrated the capacity to cope with current demand, let alone any increase in population.
- 1.2 We recognise that a Local Plan can deliver potential site for the required infrastructure, but the current economic environment and lack of local, regional, and nation funding has meant difficulties in providing this. Although new building and extensions can be provided, the need for suitable trained and qualified staffing is also a serious concern and it is noted that this is a national problem (e.g., Doctors require 6 years training, and the existing pipeline will struggle to cope with Doctor's retirement projection, let alone the population growth and schools will require a mix of qualified and new staff).
- 1.3 Previous Medway Local Plans have led to a step change in infrastructure provision with a major investment in road infrastructure, but even this now has serious problems with congestion and air quality. Since previous plans the cost of new infrastructure has ballooned and above the economic scale of local developers and with the priority given to house building, permission is often granted without the required infrastructure. There needs to be an urgent need into Land Value Capture (a method of capturing some of the increase in land values that development brings for larger developments and its suitability for individual or combination of developments across Medway or in specific areas. To provide key infrastructure improvements (perhaps at a smaller scale as well) in the absence of any Community Infrastructure Levy Scheme.

Traffic volume on the a228, between the M20 and M2 has led to a serious deterioration in the road structure and utility services has led to frequent lane restrictions and single carriageway working for extended periods. This is a core artery for local residents and public transport in the area.
- 1.4 The strategic gap between Medway and Tonbridge & Malling has been severely eroded with retail and industrial developments in Snodland, just across the boundary.

1.5 The Medway Towns has one of the largest populations in the South East, outside London, but is still expected to take its share of the regional growth – however this is on top of the existing provision!

2.0 Land Availability

2.1 Existing Pipeline

Following major developments in Halling since the previous 2003 Local Plan (St Andrews) and across the river (connected by a new bridge) on top of the previous Halling Riverside developments and elsewhere (Tonbridge & Malling) there has been considerable pressure on local community infrastructure.

2.2 Call for Sites

A number of sites have been suggested for the Halling Parish Area: -

CHR2 Land at Pilgrims Road Halling, land within or bordering on the Area of Outstanding Natural Beauty (AONB)

CHR4 Land forming part of Medway/Holborough Cement Works – a major development of c.1100 homes (built out over 10 years) and bordering Snodland/T&M proposals. This is likely to fall within the AONB or bordering it. If this is defined in the Draft and final Local Plan, there will need to be extensive involvement in the detail with the Local Community.

CHR7 The North Field Woodlands, Pilgrims Road 100 -193 Dwellings. On GREEN BELT land adjacent to the St Andrews development.

There will need to be more discussion about the impact of these proposals on the local road and community infrastructure and commitments identified before developments are approved. There are existing parish facilities that will require upgrading and significant development contributions will be necessary to improve these for an enlarged community.

Maintenance and improvement of the local Public Rights of Way network, the river side and the AONB will be required.

A request from Gravesham Council for consideration to a request for 2,000 of their homes to be considered in the Medway Local Plan 2040 needs to be rejected due to local pressures.

Their needs to be a focus on local needs housing and the introduction of Community-Led Housing projects to provide for local residents.

3.0 Pressure on Road Network outside of the Parish Area

3.1 The main pressure will come from developments in Tonbridge & Malling on both sides of the river and, if approved, the Lower Thames Crossing. Medway Council will need to keep a close eye on these developments and ensure involvement to put the case for local improvements to mitigate pressures.

Chris Fribbins, Clerk Halling Parish Council

Councillor Christopher Spalding – Member for All Saints Ward

Response to Regulation 18 Consultation

Preamble

It is accepted the need for a new local plan is a priority but one thing the past has taught us is that a rushed and hurried exercise is doomed to failure. While many may suggest the previous attempt disintegrated due to internal politics of the ruling group on Medway council, the simple fact is the document was fatally flawed in many areas with errors abound. An example being the ludicrous population figures quoted within a few paragraphs from the start.

The new ruling group's commitment to this urgently needed item is welcome, but the proposal to have a draft local plan document in place and ready for independent examination by the end of 2024 seems overly ambitious.

This regulation 18 consultation lacks even minimal detail on many major aspects of the local plan such as areas designated for business, jobs, industry, and green spaces. Education merits barely a mention.

The glossy brochure produced by Medway council mentions jobs and services and infrastructure. There is reference to land being allocated for new development such as businesses. However, the lack of any basic detail on these very important issues is worrying.

While it is acknowledged the brochure advises such detail will follow in the next stage of the consultation, in 2024, this lack of inclusion now is concerning.

The current consultation and the brochure concentrate on housing sites alone and while these are the predominant thoughts of many the lack of information on other subjects is made worse by this predominance.

It is acknowledged the proposed housing development areas is stated as being a call for sites with no predetermination. However, the reality appears different with a certain Labour Councillor recently stating on social media,

“Firstly we’re getting on with a local plan which means we know where housing is going”

The implications are obvious.

It is noted the consultation refers to establishing Medway as ‘a leading regional city’.

Medway does not have ‘city’ status and recent attempts to obtain same have failed. Rather than promote something it is not, why not concentrate on what Medway actually is.

Medway is not by definition a city but a collection of towns each with unique identity and intrinsic value to the collective area that is known as Medway.

Enormous challenges face Medway. There is currently inadequate infrastructure. Roads are congested. Drainage systems cannot cope. Utility supplies are under severe pressure in

certain areas. Public transport is localised. Healthcare provision is considered at breaking point. Medway Maritime Hospital not only serves Medway but surrounding areas as well. There is insufficient GP provision and the associated services that go alongside this.

The closeness to London makes recruitment and retention of key workers difficult given the higher salaries on offer there. Housing drift continues as Londoners sell up and move into areas such as Medway. This drives up house prices and also takes away housing stock, both factors in depriving local people of the opportunity to live in the area they currently call home.

All Saints Ward

The electoral ward of All Saints lies right on the edge of Medway at the end of the Peninsula. While many refer to the area as the Hoo Peninsula, the simple fact is the Peninsula does not stop at Hoo as signified by the previous electoral ward designation simply as "Peninsula".

All Saints encompasses the villages of Grain, Allhallows, Stoke and St Mary Hoo. Each has its own individual character and identity. Similarly, each has its own issues while sharing several common problems.

Poor mobile phone signals, flooding, inadequate broadband and intermittent electricity supplies are just a few.

Although doctor surgeries exist, these are redundant and hardly used with GP services centrally located in Hoo. Bus services are poor. Buses often do not turn up and sometimes terminate before the end of route.

The location of All Saints means residents are even more adversely affected by accidents or roadworks, or flooding that may occur due because there is only one road on and off the Peninsula. Recent roadworks on Four Elms Hill saw pupils late for school and people not arriving at work on time.

The Consultation Document

1.3 The Council is consulting on this document to get input from local people, businesses, community and interest groups and wider organisations to the direction and content of the new Local Plan. This document considers why we need to plan for Medway's growth. It looks at where we need to make changes, such as our high streets which have been impacted by changes in shopping patterns. It refers to those aspects of Medway that we want to safeguard for the future, such as beautiful landscapes and historic buildings. This document also outlines potential options for where we may build new homes, workplaces and services, such as schools and surgeries.

The brochure produced and provided by the council lacks detail on High Streets and there is minimal mention of landscapes and historic buildings and sites. There is no suggestion where schools and or surgeries may be located. Many areas already have surgeries but no doctors or nurses to staff them. This lack of early stage detail is unhelpful.

1.4 This consultation does not detail policies or identify those sites preferred by the Council for new development. That detail will come in the next stage of work on the Local Plan, which the Council will publish next year.

Again, the lack of early stage detail is unhelpful. The wording indicates there are sites preferred by the Council for new development. These sites most definitely should have been included in this consultation!

1.5 This is a good opportunity for people to contribute to the important discussions about how Medway could change over coming years. This consultation will help to define priorities for our environment, communities and economy. These can then be reflected in how we draw up policies for the new Plan. We also want people to share their views about regenerating the urban centres and riverside sites in Medway, and potential development in suburban and rural areas.

The Peninsula does not stop at Hoo, yet the only roadshow event for this consultation was held in Hoo. Furthermore, it was held the same day as a full council meeting thus preventing the Peninsula Councillors from attending the whole event if at all.

2.3 The Plan will consider the diverse communities who make up Medway. Policies for housing, employment, transport, services and community facilities, retail and design need to take account of the needs of different sectors of the community. This will be reflected in the types of housing planned and infrastructure required, such as schools and parks.

Infrastructure is not just schools and parks. Road and Rail links are just as, if not, more important. There is no point having a brilliant school if nobody can get to it easily.

Train services linking the towns of Rainham, Gillingham Chatham Rochester and Strood could be considered excellent provided you live close enough to a station. Even Cuxton and Halling have stations but there is no provision on the Peninsula.

The current one road on and off situation has time and again been found wanting.

2.4 The Plan must address big issues for Medway – the environment, high quality energy efficient homes that are affordable and within the reach of residents, health and wellbeing, boosting the economy and tackling deprivation. There are many areas where we need to improve on the current position. The Local Plan is one of the approaches that the Council can take to help address inequalities, poor environmental standards and reduce pressures on services. The plan will be about ambitions that can be achieved for a confident future Medway.

I agree with this statement. Medway has a history of ambition and should not be afraid to be ambitious in the future, but it needs to be the right ambition and not something that is merely fanciful.

2.5 Climate change is a global emergency but needs to be addressed at all levels. Medway as a coastal area is particularly vulnerable to rising sea levels, and changes in temperature and precipitation have impacts for landscape, food production, nature and people. The new Local Plan will help to secure a more resilient future for Medway.

I concur with this statement. Flooding is now being seen as a regular occurrence particularly in Stoke. Not only is a robust river and coastal strategy required, but attention to drainage systems and capacity is needed.

2.10 This consultation document has been drawn up following the withdrawal of Government funding from the Housing Infrastructure Fund (HIF) for strategic transport and environmental schemes. The HIF programme sought to get key infrastructure in place ahead of growth coming forward in Medway. It is widely recognised that the existing transport networks are under pressure across Medway and upgrades are needed to cope with increased journeys that will come as Medway's communities and businesses expand. Infrastructure and environmental concerns are at the forefront of the Council's work on the new Local Plan. The withdrawal of the HIF funding means that the Council will look at alternatives for securing investment in transport and green infrastructure across Medway, as these remain strategic matters central to the new Plan.

From the moment it was announced I and the late Councillor Pendergast had misgivings about the sheer scale of what was being proposed with the amount of money being provided. It was clearly documented the HIF funding was to unlock thousands of homes on the Peninsula.

The scenario was very much chicken and egg. The current transport network is at full capacity so here is money to alleviate that. Having alleviated that you get thousands of new dwellings which then refill said capacity so there is no overall benefit.

Any new infrastructure must not only provide capacity for new development it must also ensure there is an overall improvement and benefit.

3. Vision for Medway in 2040

As a vision it is ambitious as it should be. One particular sentence stands out for me. ***Medway's farmland produces quality food and drink and is contributing to the management of natural resources.***

Emphasis should be development on brownfield sites with farmland retained for food production.

4. Strategic objectives

I agree with the strategic objectives outlined. My only reservation is the inclusion of Chatham Docks as a site for potential housing development. Although a brownfield site the costs of cleansing the site ready for housing are likely to be prohibitive. Furthermore, this is an area of skilled employment, and that skilled employment should be protected and encouraged.

5.1 The Local Plan will include a Policies Map, which will show how land is allocated for new development, such as housing and employment, and where land is protected, such as environmental designations for nature and landscape. The Policies Map and Key Diagram help to communicate Medway's spatial strategy – how we are planning for the future.

Any Policies Map needs to be clearly defined not just in terms of specific areas but also detailing any environmental designations and protections.

5.2 A Local Plan should be positively prepared for sustainable development. It should not be used to stop development that is needed for our growing and changing communities. The Plan should seek to direct and manage growth, so that it provides land for homes, jobs and services, as well as protecting the area's natural resources and historic features.

For “should” read “MUST”.

5.3 Government directs Local Planning Authorities to use its 'Standard Method' in determining the scale of housing needed over the plan period. This Standard Method formula for Local Housing Need identifies a need for 1,667 homes a year in Medway, or around 28,500 over the plan period to 2040. This level of housing need is greatly higher than rates of housebuilding seen in Medway for over 30 years. The formula reflects dated demographic projections and has been heavily criticised across the country and there is currently some uncertainty with Government policy. At the time of writing, the Government had not yet published its response to the consultation on revisions to the National Planning Policy Framework, which included consideration of the Standard Method formula.

Any local plan needs to be flexible enough to adapt to any changes in Government policy or means of calculation and consideration MUST be given to the possibility of a change of Government in late 2024/early 2025.

5.4 The Council has raised concerns in Government consultations about the Standard Method. A key matter for Medway is the marked variation in levels of housing needs generated by the Standard Method based on projections from 2014, in comparison to use of more recent demographic projections for Medway's growth. This matter was considered in the Medway Housing and Demographics report supporting the Local Housing Needs Assessment published in 2021, and is illustrated in Figure 1 below, which is an extract from the report. The dwelling-led Standard Method scenario is clearly significantly higher than use of other approaches to forecasts. The Government considers that this method is appropriate to meet its housebuilding ambitions to tackle pressures in the housing market. Notwithstanding the concerns regarding the methodology, it has to be recognised that there is a housing crisis, particularly regarding affordability and there is an absolute need to provide the right homes in the right places to meet Medway's growing needs and the requirements for those desperately needing a good quality home. There are many existing residents in Medway living in over crowded and/or substandard conditions which is unhealthy or living at home with parents well into their late 30's because they simply cannot afford to live independently in the area they wish to continue to live.

I agree with this statement and encourage the Council to continue to raise concerns. Serious consideration needs to be given to affordable housing at the expense of for profit housing. In addition, existing housing stock need to be of satisfactory condition.

5.5 The Council will be reviewing the outcomes of Government consultations and anticipated policy updates in preparing the draft Local Plan for publication next year.

I am pleased to see this statement and agree it is a necessity.

5.6 The Council is collating a comprehensive evidence base to inform the new Plan. All potential sites will be assessed for their ability to deliver sustainable development, considering constraints and mitigations, and how they could meet the objectives of the Sustainability Appraisal and objectives for the Plan. The Council needs to demonstrate that the growth strategy set out in the Plan can be delivered, to provide certainty and confidence in Medway's growth. Potential sites and locations will be tested against a range of criteria, including transport impacts and viability.

I welcome and agree with this statement. While some development in the villages of All Saints ward may be deemed appropriate and beneficial, excessive development may destroy the intrinsic values of the village environment.

5.7 Work to date has highlighted some critical constraints. National Highways has indicated that there is insufficient capacity in parts of the Strategic Road Network to accommodate significant growth. National Highways has identified capacity and safety concerns with M2 Junction 1. Although this is outside of Medway's boundary, it is a key junction for the area, and many residents and workers travel through this junction regularly. There are no plans to upgrade this junction as part of National Highway's plans for the Lower Thames Crossing (LTC). Without a clear scheme in place to address these issues, development of jobs and homes across north and mid-Kent will be stymied. The Council is working with neighbouring authorities and wider stakeholders to prioritise action on M2 Junction 1. This matter would need to be addressed in the Local Plan, with policies showing how impacts could be mitigated and improvements delivered.

5.8 In addition to this current issue, further transport impacts are expected with the development of the LTC. The LTC is focused on a defined scheme for its primary route and tunnel. The scheme does not provide for improvements that may be needed to part of the surrounding roads network that would be impacted as a result of the new crossing. The new crossing is forecast to generate new trips, as well as re-routing existing journeys, as drivers divert from Dartford.

5.9 This is a particular concern for Medway, as the modelling assumptions used in planning for the LTC underestimate the amount of development growth that would be expected in the new Local Plan. There are concerns that the road network will not have the capacity to accommodate the higher levels of homes and jobs planned in Medway. This raises uncertainty for the capacity of the highway network to meet the full scale of development needs over the plan period. This could be a strategic constraint to

development and the Plan would need to reflect lower levels of growth in Medway, with the consequent impact on delivery of new jobs and homes to Medway's need and related affordability of homes.

I agree with all three statements. My previous comments apply in that any infrastructure improvements should not just provide further capacity to be infilled but should also ensure benefits and improvements.

5.10 Further consideration will be given to potential impacts on the environment, especially the designated habitats and landscapes which form a large part of Medway's area, and strategic infrastructure needs. The Council will need to assess how negative impacts can be avoided, or mitigated, such as through delivery of new services.

I agree this is necessary.

5.11 In addition to assessing how to meet Medway's needs for 28,500 new homes over the Plan period, the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham's housing needs, following a request from the neighbouring borough.

Medway Council should be aware that environmental restraints may mean it cannot meet any imposed housing target. Consideration should be given to requesting neighbouring authorities to provide homes to meet our target.

Other councils are proposing developments on Medway's doorstep that would see Medway bear the brunt of providing resources such as school places etc. but without any benefits.

5.16 The Council has identified four broad categories of locations where development could take place, reflecting Medway's geography. Indicative housing capacities from the LAA for the different areas are presented for each category (Note, this is NOT allocating numbers to allocated sites but merely reflects the LAA):

Given the potential number of houses and the actual requirement, it is not unreasonable to suggest a fair allocation across Medway free from any political bias could be achieved.

5.21 In addition to these sites, the Council is also considering the potential for wider development in urban waterfronts. Land has been promoted for redevelopment at Chatham Docks and Medway City Estate. These large sites could provide for new homes as well as workspace for businesses and services. Such major redevelopment would have a marked impact on the area and would involve the relocation of existing businesses.

In my opinion, both Chatham Docks and Medway City Estate should remain areas of Industry and business only. This would protect existing employment and also segregate two major employment and business areas away from housing areas.

5.22 The central urban areas benefit from good public transport links, existing services and businesses, universities and colleges and major visitor attractions. These offer sustainable locations for new development, in line with national planning policy. There are underused

and vacant sites, reflecting changes in work and retail patterns over a number of years. These locations have the potential for higher density development, making the best use of previously developed land. The accessibility of town centre sites can offer attractive living environments for a wider range of people. Town centre regeneration is not limited to flats for younger people but has the potential to meet the needs of older people and families. The plan will need to reflect the needs of wider communities in shaping policies and allocations for central areas.

I agree with this statement and reiterate my comments about the need for good public transport in outlying areas.

5.23 Vacant units on the High Street could be redeveloped with space for businesses and community services on the ground floor, with new homes on higher floors. As businesses, particularly office-based activities, look at new models of working, town centre sites could have an important role in diversifying our employment land offer.

I agree with this statement.

5.24 The continued success of urban regeneration in Medway will involve directing new homes to locations where everyday needs can be met; these locations are already – or could be – well-served by public transport for medium and long-distance journeys. If we do not achieve meaningful shifts in how people travel, the centres and surrounding roads will be subject to further congestion, with associated air quality and amenity issues, and development will be constrained by levels of car parking.

I agree with this statement.

5.25 The waterfront is an important area for nature and much of the river in central Medway is a designated Marine Conservation Zone. This means that the impacts of development, such as light, noise and other disturbance on the river may need to be considered. As a coastal authority, Medway is also subject to the impacts of rising sea levels with climate change. This is a particular consideration in planning for the redevelopment of waterfront sites, and the need to futureproof buildings. Much of Medway's noted heritage is located in the central urban areas, such as the Chatham Historic Dockyard and its defences, and Rochester Castle and Cathedral. New development must be sensitive to the historic significance of its surroundings.

I agree with this statement.

5.26 Sites considered in this development involve the redevelopment of brownfield sites, sometimes with demolition, conversion or land decontamination required. Development of such sites tends to have higher costs for these reasons, and this can affect viability, meaning that the sites are not attractive to the market, or lower quality schemes are built. The Council is testing the viability of sites through its work on the Local Plan and will consider how policy can encourage redevelopment in these areas.

Some sites identified for potential allocations in the new Plan have not been proposed by land owners or developers, but from the Council's work in assessing land availability and development briefs. The Council will seek to engage with the development sector to encourage them to consider promoting their sites.

This is a positive move. Consideration of all sites should be broad based and not just down to a developer or land owner being able to hit a profit target.

5.27 There are key opportunities for urban regeneration and potential for thousands of new homes. It will be important to ensure that homes are supported by services, including new schools and health facilities. Planning for major redevelopment must be for sustainable development.

I agree with this statement and would add that the planning should include the ability to staff such facilities.

5.28 There are sites promoted for development in urban areas which would involve significant changes to employment land at Chatham Docks and Medway City Estate. These raise issues on the possible re-location of existing businesses, as well as the types of new businesses that may be attracted to the areas. Conflict with surrounding land uses is also a key matter, particularly where residential areas may be coming forward next to busy employment sites. A strategic and comprehensive approach is critical to avoid piecemeal development that may not provide good living standards and could create tension with surrounding land uses.

Chatham Docks and Medway City Estate should NOT be designated for housing.

Suburban Expansion Generally

Suburban expansion should be carefully considered and not at the expense of farmland.

5.37 The peninsula includes areas of the best and most versatile land for agriculture, and there is a strong farming presence. However, the area is also characterised by wider industries, particularly the legacy of the energy sector at Grain and Kingsnorth. These two large brownfield sites form an important part of Medway's employment land supply and offer unique opportunities for further jobs growth such as realising opportunities for green technology as the country moves to zero-carbon.

Development on the best and most versatile agricultural land should be avoided. Having industrial areas in Grain and Kingsnorth does not characterise the peninsula. This is misleading. These areas are just two areas in a vast swathe of rural greenspace.

5.38 There are a number of villages on the peninsula, with the largest being Hoo St Werburgh. Hoo has a population of over 10,000 people and provides services, such as schools and sports facilities to the wider villages on the peninsula. However, many residents travel off the peninsula to reach workplaces, shops and other services. There are high levels of car ownership and public transport services are limited in a number of areas.

This is a correct statement. The bus service is incredibly poor. Many people would use public transport if it was reasonably priced and there was a good service. I have long advocated shuttle buses serving the villages and linking with a larger service at for example Hoo Marina.

5.39 The vast majority of sites that have been put forward for potential development in rural Medway (outside of the Green Belt designation) are on the Hoo Peninsula. Most of the sites are promoted for housing led development, with the exception of the larger employment sites. It is noted that many of the sites promoted for development on the Hoo Peninsula are large scale, each potentially providing land for hundreds of homes.

It should be noted the majority of these sites are all excellent farmland on which development should be avoided, regardless of the fact hundreds of homes capacity may make life easier for others.

5.40 There is significant land for potential development for homes, jobs and services on the Hoo Peninsula. The Council has recognised this potential through its work on the Local Plan, and considering options for how Medway can grow in the future. The Council has considered the potential for large scale growth on the peninsula through its work on the draft Hoo Development Framework which was published for consultation in 2022. The Housing Infrastructure Fund (HIF) programme sought to deliver improvements to transport and put measures in place to strengthen the local environment. These would provide certainty in planning for future development in the area, and in assessing sites across Medway in the context of constraints and possible mitigations in preparing the Local Plan.

5.41 In the absence of the HIF funding programme, the opportunities and issues still remain key considerations in the preparation of the new Local Plan. Large scale development around Hoo St Werburgh and neighbouring villages could provide for planned growth, where new housing is supported by new and improved services and infrastructure. Such development could also help to meet the Council's ambitions for greener growth, with higher environmental standards in construction, communities better connected for walking and cycling, and within easy reach of local services.

Many of these proposed sites may prove to be unsustainable particularly given the lack of infrastructure. Unless there is provision of significant investment in electricity supply, drainage and sewage as well as transports links, most, if not all these proposed sites are non starters.

5.42 The peninsula also has a key role in Medway's economic development strategy, with major sites at Grain and Kingsnorth offering potential for new employment sectors and being regional hubs in energy and green technology industries, contributing to de-carbonisation of the economy. The area's environment also offers opportunities to develop green tourism, based on assets such as the estuaries and the spectacular shows of birdlife. Agriculture will continue to be an important land use for the peninsula.

I agree with this statement and these opportunities should be pursued.

5.43 The Hoo Peninsula has significant potential for further development, as part of Medway's wider growth in coming decades. This is shown in the extensive number of sites promoted for development on the peninsula, and the scale of potential sites. However, there are a number of specific considerations for development on the peninsula.

I disagree entirely with this statement. Just because sites are promoted by financially interested parties, it is not evidence of significant potential. Given the numerous constraints, that affect these sites, this statement could be considered highly misleading.

5.44 The area's special and distinctive environment is a primary consideration. The Local Plan will set out a strategy, not just for development, but also for strengthening our green infrastructure networks and sites. Biodiversity, landscape, and water management are just some of the key matters in environmental planning. The Council will assess the potential impacts of possible development sites on different aspects of the natural environment, with specific attention to the designated areas, such as SSSIs and the SPAs.

I agree with this statement and would remind the council a failure to adequately and completely assess the potential impacts could lead to a legal challenge by any of the many interested groups.

5.45 A further strategic consideration is the capacity of infrastructure to support major growth on the Hoo Peninsula. Transport networks would need to be upgraded. The roads network is limited, with particular concerns on the capacity of Four Elms roundabout and congestion on the adjoining roads, which exacerbates air pollution. Bus services reflect the rural nature of the area, with reduced frequency compared to urban Medway. The Council will require major transport schemes to provide for sustainable transport choice and increase the capacity of the road network, to facilitate growth on the Hoo Peninsula.

I agree with this statement save that bus services have intermittent frequency rather than reduced.

5.46 Similarly wider investment is required in wider services, such as schools and health and leisure facilities, to support larger communities, as the existing infrastructure reflects the area's rural character and villages. Large scale growth would need careful planning for phasing and design to provide for sustainable development.

Wider investment is also required in electricity supply especially given the majority of new houses are set to be all electric. Extra investment is also needed in drainage and sewage services. Any scale growth needs careful planning, not just large scale.

5.55 A sustainable development strategy provides for homes, jobs and services. Housing sites in the strategy tend to attract the greatest interest, but it is important to draw up a balanced plan for Medway. This includes setting out our plan for boosting jobs and supporting businesses to expand, start up, or be relocated in and to Medway. The choice and quality of sites available to businesses is critical to our economic development strategy.

I agree with this statement.

5.57 A number of sites are being considered through the Land Availability Assessment for employment allocations in the new Local Plan. These include the strategic sites at Grain and Kingsnorth on the Hoo Peninsula, with unique opportunities in specialist sectors, such as energy and green technology, and making use of wharfage facilities.

5.58 The Innovation Park Medway seeks to provide high quality business space that continue to build Medway's profile for high value jobs and sectors.

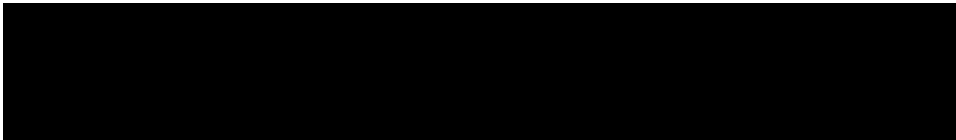
5.59 The diverse sites provide space for very different industries, allowing Medway to attract inward investment and meet the needs for businesses to grow locally.

5.60 Transport infrastructure is again a key consideration with employment land. Plans to expand business uses may be challenged by limited capacity on roads, and poor public transport connections. There are specific issues with the Strategic Road Network as highlighted above.

5.61 In addition, there are impacts on local roads, particularly where businesses involve warehousing and distribution uses.

5.62 The Council will need to carefully consider the impacts of employment land proposals to provide direction on the capacity of transport networks and the requirements for sustainable travel options.

I agree with these statements.



From: Councillor Alex Hyne
Sent: 31 October 2023 20:58
To: futuremedway
Cc: Councillor Robbie Lammas
Subject: Joint response from Cllr Hyne and Cllr Lammas re Local Plan consultation

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

Dear Mr Harris,

As the elected representatives of Princes Park ward, please accept this as our formal submission regarding the ongoing Local Plan consultation.

While we understand the necessity of building new homes to accommodate our growing population, we firmly believe that it is equally important to protect and preserve our precious countryside.

One area of particular concern to us and our residents of Princes Park is the potential for housing development within Capstone Valley; the valley holds a special place in the hearts of our community. Its natural beauty, green spaces, and recreational opportunities make it a cherished asset for our residents. However, we fear that unsustainable housing development could irreparably harm this delicate ecosystem and our way of life.

We acknowledge the fine balance that must be struck in drafting the Local Plan – the need to provide for new housing while safeguarding the unique character of our countryside. It is our sincere hope that the final plan will prioritise responsible and sustainable development, considering the long-term impact on our environment and the well-being of our residents.

We urge you to consider the following points during the formulation of the Local Plan. This includes:

1. The preservation of Capstone Valley's natural beauty and ecological value, taking into account the importance of green spaces for the physical and mental well-being of our community.
2. The implementation of responsible development practices that reduce the ecological footprint of any construction within Capstone Valley.
3. The engagement of our local community in the decision-making process, ensuring that the voices of Princes Park residents are heard and considered.
4. The consideration of alternative locations for housing development that may have a lesser impact on our countryside and its unique character.

We are committed to working collaboratively with Medway Council to develop a Local Plan that meets the housing needs of our area without sacrificing our natural heritage.

We kindly request that you take the above concerns into account as you finalise the draft Local Plan.

We look forward to continued dialogue and cooperation to ensure the best possible outcome for our residents and the community we serve.

Yours sincerely

Cllr Alex Hyne & Cllr Robbie Lammas
Members for Princes Park



KELLY TOLHURST MP

Member of Parliament for Rochester and Strood

Medway Council
Planning Department
Gun Wharf
Dock Road
Chatham
ME4 4TR

Our Ref: KT38410
31st October 2023

Dear Sir/ Madam,

I am writing to respond to the Medway Local Plan 2022-2040 Regulation 18 Consultation. The Standard Method formula for Local Housing Need has identified a need for 1,667 homes a year in Medway, or around 28,500 over the plan period to 2040. Therefore, Medway Council have stated that the housing needs for Medway over the plan period of 2022-2040 is for 28,339 homes. Providing for a buffer to allow for some sites not coming forward for development would lift the total plan period need to over 29,000 homes.

I have worked with colleagues in Parliament to ensure that housing targets are advisory, not mandatory. The Government are currently analysing the results of a recent consultation on changes to the National Planning Policy Framework. I believe these targets cause huge issues for the Rochester and Strood constituency and put councils under huge pressure to deliver housing in inappropriate and unsuitable areas with a focus on numbers not types of accommodation to meet actual need.

Linked to this, I also commented upon the need for constraints to play a greater part in lowering that target number. We have many unique factors in different parts of the constituency which mean some areas are simply not right for housing and we must protect these places, if the Government accept this argument, then we will greatly reduce the pressure to build in the wrong areas.

I was disappointed by the Council's lack of vision in the Medway Local Plan 2022-2040 document and it has resurfaced past frustrations with the failure to think strategically about the future of Medway and how the towns will look in 2040. There are no proposals on how to make the most of what we have, this is exhibited by the failure to demonstrate how Medway can produce high-quality jobs with the necessary employment land. Nor are there ideas for how the Council plan to deal with the increase in population and the delivery of required services, such as hospital needs or a plan for social care.

The Council are proposing significant changes to the make up of the towns with the housing target and they must realise this means a much more detailed plan is required to provide information for residents what life in Medway will be like in 2040.

Hoo Peninsula

It is disappointing that in the section titled 'Sites with the potential for development in the rural areas could provide capacity for 14,621 homes', Medway Council demonstrate their continued willingness for large scale building on the Hoo Peninsula, in my constituency. After the failed HIF project, it is disappointing the Council have not learnt the lessons of that episode, the independent decision makers were unable to accept the plans, due to the deliverability and cost, however without a proper plan that is deliverable, it is still unclear how this scale of housing can be delivered sustainably. The vast majority of sites that have been put forward for potential development are on the Hoo Peninsula.

I have long made clear to the Council that this area is not suitable for the type of development they are proposing so I would like greater clarity from the Council on what they are proposing for the Hoo Peninsula. The joining up of distinct villages is totally out of character to the area. It is not fair to propose roughly half the area's housing target in one area of one constituency of the three that serve Medway. The Council have also said that "many of the sites promoted for development on the Hoo Peninsula are large scale, each potentially providing land for hundreds of homes." This is a worrying proposal for many residents on the Hoo Peninsula.

The fact that this is still the case in the aftermath of the HIF funding loss is a surprise. The loss of HIF funding showed the Council were unable to manage large-scale projects to deliver the necessary infrastructure improvements for the Hoo Peninsula. Therefore, it is unclear how they propose to accommodate this level of housing with no plan for the future of infrastructure in the area, which are already struggling.

Constant threats of "large scale development around Hoo St Werburgh and neighbouring villages", are an unwise approach from the Council to this part of my constituency. It remains a frustration that the Council are continuing this approach to the Hoo Peninsula of imposing development on residents instead of working with the local community in order to come up with a plan that would be welcomed by existing residents.

These areas are not suitable for large scale development as has been the case for many years and is often made clear to developers. This area is surrounded by Ramsar sites, Sites of Special Scientific Interest (SSSIs) and is important for migrating birds. I urge the Council to rethink their proposals for the Hoo Peninsula due to the unique and special characteristics that we are lucky to have, and they are keen to destroy.

It is disappointing, large areas of Medway are not being included in Regulation 18 for rural development and one part of Medway should not be having to take the burden for the whole of the towns.

Chatham Docks and Employment land

The Council have regrettably continued their policy of proposing Chatham Docks as land for development instead of designating it as employment land. This was a surprise as the Labour group, while in opposition, supported the Save Chatham Docks campaign, in fact the Leader of the Labour Party, Sir Keir Starmer MP, also voiced his support for this campaign. Therefore, I was surprised to see that the site remains under consideration for wider development. Land has been promoted for redevelopment at Chatham Docks and Medway City Estate. The Council have stated that these "large sites could provide for new homes as well as workspace for businesses and services. Such major redevelopment would have a marked impact on the area and would involve the relocation of existing businesses."

The matter of Chatham Docks has been discussed at length and Chatham Docks has significant local support, there is an alternative plan for Chatham Docks, which would see the development of increased economic activity and make better use of what is a significantly important regional infrastructure site. The loss of such important economic site for short term gain contradicts what the consultation document outlines as a vision. The inclusion of Chatham docks was an issue which contributed to the downfall of previous iterations of the Local Plan process.

Medway City industrial Estate has been a success story in the Medway towns and has contributed to economic development of the area. I am concerned that whilst this is being considered for housing development, we are not recognising the current needs that exist already in the towns, which is the lack of commercial sites for a range of businesses which are looking to expand and grow.

Green Belt and ANOB

I am concerned by the proposals within the consultation document to bring forward more Green belt land within my constituency for development. In Halling, Cuxton and Strood. As the consultation document states we have less the 5% Green Belt within the Medway Towns so further loss would be a detrimental to the local area. This is particularly important due to the pressures we are seeing in North Kent and the progression of the LTC.

Housing targets

The pressure on Medway Council to deliver housing in these sites in my constituency are the result of the housing targets mentioned at the start of my response.

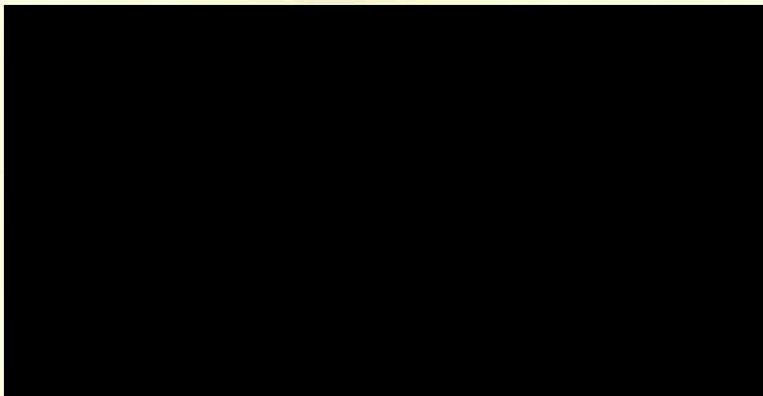
I believe these targets put my constituency under enormous pressure to deliver inappropriate numbers of housing in the wrong areas that do not enjoy the support of the local community who are having this top-down development enforced upon them.


As I have mentioned previously, my constituents are also forced compete with the wages of those moving from London to live in Medway. Housing associations are buying new builds and actively seeking properties on the open market. This has been pushing up prices and having a significant impact on the local market and the ability for local people to buy. This all puts further pressure on Medway's ability to deliver a cogent Local Plan and ensure the future prosperity of the Towns.

It is therefore clear that Medway's housing targets are having a disproportionate impact on my constituency. This is no way for housebuilding in this country to take place and the result is inadequate plans and inappropriate sites for housing development.

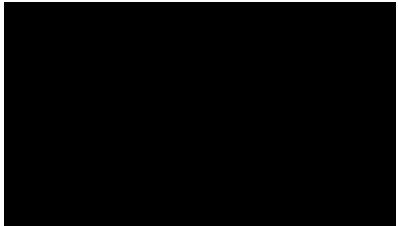
Conclusion

The draft Local Plan has unfortunately been rushed by the newly elected Labour Group. They have simply not put the necessary thought to up with a sufficient strategic view for the future of the towns. They have returned to similar sites that have previously been put forward and widely rejected by the local community and unable to achieve political support from councillors, it is staggering they are proposing sites they have already rejected, such as Chatham Docks. They have also ignored the current position of Government and the direction from central Government that is intended to put less pressure on local councils, instead they remain committed to providing large scale housing in totally inappropriate parts of my constituency.





Cllrs. Crozer, Pearce and Sands
The Independent Group
on Medway Council
Hoo & High Halstow Ward



Tuesday 31st October 2023

Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

CC: Officers - Dave Harris (Chief Planning Officer), Catherine Smith (Head of Planning Policy) and Richard Hicks (Chief Executive). Members - Cllr. Stephen Hubbard (Chair of the Planning Committee), Cllr. Chrissy Stamp (Deputy Chair of the Planning Committee), Cllr. Simon Curry (Portfolio Holder for Climate Change and Strategic Regeneration), Cllr. Vince Maple (Leader of the Council) and Cllr. Teresa Murray (Deputy Leader of the Council).

Re: Medway Council Local Plan Regulation 18 Consultation (2023) - Setting the direction for Medway 2040

Dear Medway Council,

We write to you as the three Independent Councillors for Hoo and High Halstow Ward on Medway Council - representing the communities of Chattenden, High Halstow and Hoo on the Hoo Peninsula. This is our representation to the Council's Local Plan Regulation 18 Consultation (2023) - Setting the direction for Medway 2040.

Background and context.

The Council formerly restarted the Local Plan process in October 2022 and has recently carried out a new Call for Sites. This decision has brought us to the Regulation 18 document currently being consulted on. The clarity regarding the Council **NOT** having a preferred strategy or a list of preferred sites at this early stage is very welcomed.

The Council has attempted three times to replace the 2003 Local Plan. The first attempt in 2007 and the second attempt in 2013 both reached Independent Examination stage but had to be withdrawn after being found 'Unsound' by the Inspector - both of these focused significant development on the Hoo Peninsula. The third attempt was in 2021 with a tabled draft Local Plan, to be approved by members, but this was later withdrawn - this plan also focused significant development on the Hoo Peninsula.

Lodge Hill.

In 2013 the Council submitted its Core Strategy (Local Plan) for Independent Examination. The centrepiece of this plan was a proposal for a new town, consisting of 5,000 houses, to be built on a Nightingale bird sanctuary at Lodge Hill. This plan attracted national controversy for the Council, particularly when Lodge Hill was declared a Site of Special Scientific Interest (SSSI) the same year.

The Council challenged Natural England during its decision-making process to designate the site and was found to have presented inaccurate information at that hearing. The Inspector declared the Council's plan 'Unsound'

and was not convinced there were no reasonable alternatives within the Local Plan area to the Lodge Hill allocation. The Council had not appraised other options to the same degree as the focus on the Hoo Peninsula.

Despite the Lodge Hill episode, the Council's Planning Committee approved a planning application to build 5,000 houses on the Nightingale bird sanctuary in 2014. This decision was called-in for a public inquiry but the developer withdrew the application. In 2019, Medway Council declared a Climate Emergency and Homes England is, for now, the custodians of the Lodge Hill site.

Neighbourhood Plans.

The communities of Chattenden, High Halstow and Hoo have been working on producing Neighbourhood Plans. The High Halstow Neighbourhood Plan has reached Regulation 16 and the Hoo and Chattenden Neighbourhood Plan has reached Regulation 14. Both Neighbourhood Plans are highly likely to be found 'Sound' and be adopted before Medway Council's new Local Plan.

There are a number of emerging policies within both Neighbourhood Plans that will need to be taken into account by Officers when producing the new Medway Council Local Plan. One of these key policies is the protection of the Chattenden Valley, a highly valued landscape between Chattenden and Hoo. This strategic green corridor protects the two settlements from coalescence and urban sprawl.

The Hoo Peninsula today.

The Hoo Peninsula is home to a wide range of internationally and nationally protected wildlife and habitat sites. These include Special Protection Areas (SPAs), Ramsar Convention on Wetlands of International Importance Especially as Waterfowl Habitat (RAMSAR) sites and Sites of Special Scientific Interest (SSSI). There is also a National Nature Reserve (NNR) on the Hoo Peninsula.

Over 300,000 migratory birds visit the area each year and we are home to the largest heronry and nightingale populations in Britain. There are also very healthy populations of Purple Emperor Butterfly, Water Voles, Great Crested Newts, Door Mice and Slow Worms - representing our incredible local biodiversity.

The Hoo Peninsula has a strong farming presence that sustains an agricultural economy and contributes to national food security. Several small and medium sized farmers locally supply a variety of high-quality crops to high/medium-end supermarkets such as Waitrose, Marks & Spencer and Sainsburys. Strawberries grown on the Hoo Peninsula for example are supplied to the tennis tournament at Wimbledon in London.

The Hoo Peninsula has recently transitioned through a period of industrial decline, concluding with the demolition of the iconic legacy power stations and their chimneys at Grain and Kingsnorth. Heavy industries such as oil refineries have also disappeared from the area. Perceptions of the Hoo Peninsula have changed significantly with the area now widely associated with the natural world and wildlife rather than heavy industry.

Deangate Ridge, including the former golf course site and present running track site, is a highly valued public green space at the heart and centre of the Hoo Peninsula. The site now acts as an unofficial country park and green lung to benefit the residents of the Hoo Peninsula and further afield, such as Strood. A number of protected species and rare grasses have recently been found on the Deangate Ridge site.

The Hoo Peninsula is significantly constrained by very poor transport infrastructure capacity and substantial environmental habitat sites. The level of growth being promoted by landowners/developers is not sustainable without herculean, and arguably unviable, financial state intervention to manage increased pressures on infrastructure, services and to mitigate and compensate environmental impacts of development.

Aspirations for the Hoo Peninsula.

The Hoo Peninsula must retain a strong and versatile farming economy and rural villages community. Our small and medium sized farmers in particular need to be supported and be recognised for the contribution they make to the economy and food security. Agricultural greenfield sites form Valued Landscapes (VLs) that separate villages on the Hoo Peninsula - preventing coalescence and urban sprawl.

Our area's incredible wildlife and beautiful habitat sites need to be a key priority and be protected from the direct and indirect impacts of development. Officers will need to demonstrate the Avoid, Mitigate and Compensate Hierarchy (AMCH) has been followed when selecting sites. Sites where development would negatively impact habitats should be selected as a last resort once other development options within the Local Plan area have been exhausted.

The new administration and members of the Council support the proposed East Coast Wetlands designation as a United Nations Educational, Scientific and Cultural Organization (UNESCO) Natural World Heritage site. This designation would include wetland and marshland habitat surrounding the Hoo Peninsula and within the Medway Estuary. The East Coast Wetlands proposal has already made it onto the UK's Tentative List and would be significant for the Hoo Peninsula if granted.

The remaining valued landscape of the Hoo Peninsula should become an Area of Outstanding Natural Beauty (AONB) and extension to the Kent Downs AONB, via Higham and Shorne. This ambition recognises the natural beauty of the Hoo Peninsula, most of it already worthy for Natural World Heritage Site status, and is supported by the new administration of the Council.

The Hoo Peninsula should benefit from increased green tourism to showcase our beautiful landscape and fantastic habitat sites. This increase in footfall around the Hoo Peninsula should be very carefully managed to ensure there isn't Recreational Disturbance (RD) and harm to wildlife. The Hoo Peninsula's internal transport connections need to be improved with better Public Rights of Way (PROWs), footpaths, roads and circular bus links to connect and serve our rural community.

Lower Thames Crossing (LTC) and the Strategic Road Network (SRN).

The potential impacts from the proposed Lower Thames Crossing (LTC) on the Strategic Road Network (SRN) and Local Road Network (LRN) is a critical constraint to development. This is a particular issue for the Hoo Peninsula and Strood with the potential impacts on the M2 Junction 1, Wainscott By-pass (A289) and Four Elms Roundabout. Traffic flow graphics from various consultations on the LTC show significant increases in traffic flows/trips on these roads and junctions.

As matters stand, there will not be the highway transport capacity to accommodate promoted growth on the Hoo Peninsula and Sustainable Development would not be achieved. The harms of permitting development would significantly and demonstrably outweigh the benefits of providing housing in this location. National Highways and Active Travel England are already submitting holding objections to live planning applications on the Hoo Peninsula.

Officers should strongly demonstrate to an Inspector at Examination that the Council has a genuine and justified reason for bringing forward a Local Plan that reflects lower levels of growth - because of the significant constraints to growth that exist and the potential inability to adequately mitigate services, transport and environmental impacts or to compensate harm.

Standard Methodology and potential housing capacity.

We believe there should be greater flexibility for calculating Local Housing Need (LHN). Officers at Medway Council would then be able to choose a figure ranging from 282 to 1565 houses a year. Even if the Council was able to use more up-to-date figures this would result in a reduction of around 5,700 houses needed over the plan period (up to 2040) - this is approximately the scale of development being promoted in Hoo alone.

The need to allocate sites for 19,173 new houses can potentially be met with the Urban Regeneration sites (11,151 houses) - such as Strood Riverside, Rochester Riverside and Chatham - and Suburban Growth sites (9,680 houses) - such as Capstone Valley, North Rainham and East Rainham - alone.

In other words, no Hoo Peninsula sites need to be allocated to meet the stated housing need. This is especially important when considering that Officers will need to demonstrate they have followed the Avoid, Mitigate and Compensate Hierarchy (AMCH), with regards to avoiding harm to the Hoo Peninsula's sensitive wildlife habitats, when selecting sites for development.

Next steps for Medway Council.

The Council's ambition to submit a draft Local Plan for Independent Examination by the end of next year (2024) is far too optimistic. The Council has restarted the Local Plan process with a new Call for Sites and is consulting on a Regulation 18 document that is very light on detail and contains no draft policies. There is also a lack of supporting evidence as this is still in production and will take time to process.

Following this consultation, the Council should draw up a number of spatial strategies and reasonable alternatives and score these against each other and the Sustainability Appraisal (SA) using proportionate evidence. There will need to be another round of Regulation 18 consultation on these options before progressing to a Regulation 19 draft Local Plan with a preferred option.

The Council is at risk of progressing to Regulation 19 too quickly and this may present challengeable grounds to the Local Plan at Independent Examination. Officers should look at the following broad options - these represent the only realistic spatial strategies and reasonable alternatives that can be appraised and scored against each other, particularly on environmental impacts.

Option 1: Urban Regeneration and Suburban Growth - capacity for up to 20,831 houses.

Option 2: Urban Regeneration and Rural Development - capacity for up to 25,887 houses.

Option 3: Urban Regeneration and a mix of Suburban Growth and Rural Development - capacity for approximately up to 23,359 houses.

The Council will need strong and robust evidence to support its eventual chosen spatial strategy and preferred sites. This spatial strategy must be appropriate and justified and the evidence will be heavily scrutinised and potentially challenged at Independent Examination. We would like to stress that we want a new Local Plan in place for the authority. However, this plan must be robust, evidence led, constitute sustainable development and be able to stand up to scrutiny.

There's absolutely no point submitting a vulnerable Local Plan for Independent Examination.

In conclusion.

We thank Officers for producing and consulting on this Regulation 18 document. Our more detailed response is outlined within the comments table below. We remain very concerned with, and strongly oppose, the scale of residential and commercial/industrial development being promoted on the Hoo Peninsula by landowners/developers. The impacts and harm of allowing this development would significantly and demonstrably outweigh the benefits.

We wish to provide a separate representation in due course responding to the Council's latest Strategic Land Availability Assessment (SLAA) - this will include a desktop appraisal of sites. We will also be submitting representations and comments on the Habitats Regulation Assessment (HRA) scoping report and Sustainability Appraisal (SA) scoping report that have recently been published.

Yours faithfully,

Cllr. George Crozer (Ind)
Leader
The Independent Group
on Medway Council
Hoo & High Halstow Ward

Cllr. Michael Pearce (Ind)
Deputy Leader
The Independent Group
on Medway Council
Hoo & High Halstow Ward

Cllr. Ron Sands (Ind)
Group Whip
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Consultation document:	Response:
Introduction	
<p>Page 2. Paragraph 1.4</p> <p><i>“This consultation does not detail policies or identify those sites preferred by the Council for new development. That detail will come in the next stage of work on the Local Plan, which the Council will publish next year.”</i></p>	<p>The Council has restarted the Local Plan process, including recently carrying out a new Call for Sites. In October 2022 Officers provided a planning policy update to Cabinet and stated in their report (page 2, paragraph 2.3):</p> <p><i>“It is considered appropriate to provide an additional stage of consultation at ‘Regulation 18’ on the emerging Local Plan, before the Council confirms its preferred development strategy in the draft plan at ‘Regulation 19’”.</i></p> <p>This decision has brought us to the Regulation 18 document currently being consulted on. The clarity regarding the Council NOT having a preferred strategy or a list of preferred sites at this early stage is very welcomed.</p> <p>Land promoters and/or developers on the Hoo Peninsula are currently referring to previous work undertaken by the Council, such as previous Regulation 18 consultations, the Housing Infrastructure Fund (HIF) Project or the Hoo Development Framework, in order to justify their live planning applications. This should be afforded little to no weight in planning terms as the work is either out of date, been withdrawn or doesn’t constitute formal planning policy.</p>
Context	
<p>Page 4. Paragraph 2.5</p> <p><i>“Climate change is a global emergency but needs to be addressed at all levels. Medway as a coastal area is particularly vulnerable to rising sea levels, and changes in temperature and precipitation have impacts for landscape, food production, nature and people. The new Local Plan will help to secure a more resilient future for Medway.”</i></p>	<p>We agree with this statement.</p> <p>The Hoo Peninsula is particularly vulnerable to rising sea level rises as identified by the Department for Environment, Food & Rural Affairs and the Environment Agency with regards to their Isle of Grain Policy Unit: Thames Estuary 2100 and North Kent Marshes Policy Unit: Thames Estuary 2100.</p> <p>The Council will need to create a River Strategy to comply with this.</p> <p>Riverside strategies should be an integral part of statutory local planning. They can be standalone documents or form part of a Local Plan. The Council needs to create them in collaboration with local communities. They should include community ambitions for the riverside.</p> <p>Riverside strategies need to be in place by 2030. This will enable authorities to plan future flood defence upgrades in line with these visions. In some places in the outer estuary, they will need to be in place earlier. This is because planning for defence raising will need to start before 2030.</p>
<p>Page 5. Paragraph 2.10</p> <p><i>“This consultation document has been drawn up following the withdrawal of Government funding from</i></p>	<p>The Council’s £170m Housing Infrastructure Fund (HIF) Project was designed to increase infrastructure capacity and provide environmental mitigation in order to enable development to come forward on the Hoo Peninsula. This growth, being promoted by</p>

<p><i>the Housing Infrastructure Fund (HIF) for strategic transport and environmental schemes. The HIF programme sought to get key infrastructure in place ahead of growth coming forward in Medway. It is widely recognised that the existing transport networks are under pressure across Medway and upgrades are needed to cope with increased journeys that will come as Medway’s communities and businesses expand. Infrastructure and environmental concerns are at the forefront of the Council’s work on the new Local Plan. The withdrawal of the HIF funding means that the Council will look at alternatives for securing investment in transport and green infrastructure across Medway, as these remain strategic matters central to the new Plan.”</i></p>	<p>developers/landowners, would otherwise be deemed unsustainable in the absence of such intervention.</p> <p>The Council recognises this significant constraint to growth on the Hoo Peninsula within the Business Case it submitted to Homes England in March 2019.</p> <p>Page 41 of this document states:</p> <p><i>“Dependent development testing has indicated that the current transport infrastructure can theoretically support a maximum of 2,000 homes across the Hoo Peninsula. However, the Council would be minded not to grant planning permission above the 940 homes that currently have planning permission on the Peninsula. The Council recognises that this would be forgoing the opportunity for an additional 1,060 homes on the Peninsula. However, the Council believe that any further development without upgrading the existing social and transport infrastructure, including the SEMS, would create a significant dis-benefit to existing users.”</i></p> <p>It should be noted that since March 2019, the Council has granted consent to further residential and commercial/industrial development on the Hoo Peninsula and the maximum capacity limit may have now been reached.</p> <p>The Council will need to carry out infrastructure capacity testing across the Local Plan area, including the Hoo Peninsula, in order to establish an up-to-date baseline position and the development capacity that exists today in every area. The Council will then also need to establish what infrastructure capacity upgrades (and their costs) would result in what increases in housing capacity for all areas.</p> <p>We welcome that the Council will look at potential infrastructure upgrades and environmental mitigation measures across the Local Plan area, rather than just focusing, as before, on the Hoo Peninsula in order to meet the challenging housing figure set by Government.</p>
<p>Vision for Medway in 2040</p>	
<p>Page 6. Paragraph 3.1</p> <p>*The whole section setting out the vision for Medway in 2040*</p>	<p>The Council is very clear with its aspirations for the urban area of the Medway Towns, particularly with regards to becoming a city - physically and being recognised as such. Regardless if we agree or disagree with the Council’s aspiration to become a city, the aspirations for the rural community, particularly the Hoo Peninsula, needs to be included in the overall vision.</p> <p>We welcome the Council recognising the valued landscape and countryside of the Hoo Peninsula, as well as the local heritage, coastline/riverside and natural/wildlife assets. Offices will be aware of the relevant policies within the National Planning Policy Framework (NPPF) concerning these qualities,</p>

	<p>particularly Areas or Assets of Particular Importance (AAPIs) and Valued Landscapes (VLs).</p> <p>The Hoo Peninsula has a strong farming presence, as recognised later in the consultation document, and Officers may be aware that several small and medium sized farmers locally supply a variety of high-quality crops to high/medium-end supermarkets such as Waitrose, Marks & Spencer and Sainsburys.</p> <p>Strawberries grown on the Hoo Peninsula for example are supplied to the tennis tournament at Wimbledon in London.</p> <p>The Council should include the following rural aspirations for the Hoo Peninsula within the vision.</p> <ul style="list-style-type: none"> • Maintaining a strong and versatile farming economy and rural villages community on the Hoo Peninsula - with particular support for small and medium sized farmers. • For the wetlands and habitat sites around the Hoo Peninsula, and within the Medway Estuary, to become a Natural World Heritage Site - part of the proposed East Coast Wetlands designation. This is supported by all Councillors. • For the remaining landscape of the Hoo Peninsula to become an Area of Outstanding Natural Beauty (AONB) - an extension of the Kent Downs (AONB) via Higham and Shorne. This is supported by the new administration. <p>We recognise that AONB status would not prevent all development, but the designation does create another constraint that needs to be considered when determining planning applications or for Local Plan making.</p>
Strategic objectives	
<p>Page 10. Paragraph 3.</p> <p><i>“To secure the ongoing benefits of Medway’s regeneration, making the best use of brownfield land, and bringing forward the transformation of the waterfront and town centre sites for high-quality mixed-use development, and a focus for cultural activities.”</i></p>	<p>We agree with this statement.</p> <p>Apart from the Chatham Docks allocation, the brownfield urban regeneration sites and proposed riverfront development throughout the Medway Towns represents the least politically controversial aspect to a potential spatial strategy.</p> <p>These sites still need to score highly with regards to the Sustainability Appraisal (SA) and be available and achievable/feasible for development.</p>
Developing a Spatial Strategy	
<p>Page 11. Paragraph 5.1</p> <p><i>“The Local Plan will include a Policies Map, which will show how land is allocated for new development, such as housing and employment, and where land is protected, such as environmental designations for nature and landscape. The Policies Map and Key Diagram help to communicate Medway’s spatial strategy – how we are planning for the future.”</i></p>	<p>The Council will need to map and protect from development the internationally and nationally protected wildlife sites here on the Hoo Peninsula - such as the Special Protection Areas (SPAs), RAMSAR sites, Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs).</p> <p>In terms of protected landscapes, the Medway Council 2003 Local Plan includes Areas of Local Landscape Importance (ALLIs) - some of these ALLIs</p>

	<p>are present on the Hoo Peninsula. The Council should review these and designate new Valued Landscapes (VLs), including the Chattenden Valley between Chattenden and Hoo. We can provide a suggested designation map showing this area and its context.</p>
<p>Page 11. Paragraph 5.2</p> <p><i>“A Local Plan should be positively prepared for sustainable development. It should not be used to stop development that is needed for our growing and changing communities. The Plan should seek to direct and manage growth, so that it provides land for homes, jobs and services, as well as protecting the area’s natural resources and historic features.”</i></p>	<p>From the outset, a local plan MUST be positively prepared for Sustainable Development if it is to be found ‘Sound’ at Examination.</p> <p>However, the Sustainability Appraisal (SA), other supporting evidence and local constraints may make it impossible to meet the required housing numbers in a sustainable way. This position would need to be supported by significant evidence and justification in order to be accepted by an Inspector.</p> <p>We believe the constraints, particularly on the Hoo Peninsula, haven’t been properly taken into account with previous Local Plan work undertaken by the Council.</p> <p>At some point there may be a situation where the Council can’t physically meet local housing need. This is because there isn’t enough availability of suitable and achievable sites being promoted or/and these sites can’t be developed in a sustainable way and therefore can’t be brought forward.</p>
<p>Page 11. Paragraph 5.3</p> <p><i>“Government directs Local Planning Authorities to use its ‘Standard Method’ in determining the scale of housing needed over the plan period. This Standard Method formula for Local Housing Need identifies a need for 1,667 homes a year in Medway, or around 28,500 over the plan period to 2040. This level of housing need is greatly higher than rates of housebuilding seen in Medway for over 30 years. The formula reflects dated demographic projections and has been heavily criticised across the country and there is currently some uncertainty with Government policy. At the time of writing, the Government had not yet published its response to the consultation on revisions to the National Planning Policy Framework, which included consideration of the Standard Method formula.”</i></p>	<p>We agree with this statement.</p> <p>We believe there should be greater flexibility so Councils can choose a Demographic Scenario or method to produce its Local Housing Need (LHN) figure for a Local Plan. Officers at Medway Council would then be able to choose a figure ranging from 282 to 1565 houses a year. Interestingly, even if the SNPP-2014 figure of 1,333 houses a year was used, this would result in a reduction of around 5,700 houses needed over the plan period (up to 2040) - this is approximately the scale of development being promoted in Hoo.</p> <p>The current level of housebuilding exceeds the vast majority of Demographic Scenarios/methods outlined in the Medway Housing and Demographics report 2021. Therefore, being directed by Government to use the Standard Methodology for calculating LHN is arguably unreasonable in Medway Council’s case.</p> <p>From a starting point, the Standard Methodology directs the Council to plan for a scale of growth equivalent to an incredible thirty-six High Halstow villages over the plan period (based upon present day High Halstow containing approximately 800 dwellings).</p> <p>Officers will be aware of paragraph 61 of the NPPF regarding the very issue:</p> <p><i>“Local housing need: The number of homes identified as being needed through the application of</i></p>

	<p><i>the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework)."</i></p> <p><i>"61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."</i></p> <p>We're not convinced that the Council has effectively argued its case to Government for having exceptional circumstances that would justify an alternative approach. This consultation document itself outlines the exceptional constraints and unique issues when it comes to producing a Local Plan for the area.</p>
<p>Page 12. Paragraph 5.5</p> <p><i>"The Council will be reviewing the outcomes of Government consultations and anticipated policy updates in preparing the draft Local Plan for publication next year."</i></p>	<p>We agree with and welcome this statement.</p> <p>Officers should apply any new flexibility or favourable NPPF policy changes to any emerging draft Local Plan.</p>
<p>Page 12. Paragraph 5.6</p> <p><i>"The Council is collating a comprehensive evidence base to inform the new Plan. All potential sites will be assessed for their ability to deliver sustainable development, considering constraints and mitigations, and how they could meet the objectives of the Sustainability Appraisal and objectives for the Plan. The Council needs to demonstrate that the growth strategy set out in the Plan can be delivered, to provide certainty and confidence in Medway's growth. Potential sites and locations will be tested against a range of criteria, including transport impacts and viability."</i></p>	<p>We agree with this statement.</p> <p>Officers will be aware of paragraph 32 of the NPPF concerning the Avoid, Mitigate and Compensate Hierarchy (AMCH):</p> <p><i>"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."</i></p> <p>The Hoo Peninsula is the most environmentally sensitive part of the Local Plan area with a wide range of internationally and nationally designated wildlife sites. The scale of proposed growth being promoted by landowners/developers on the Hoo Peninsula will have a significant adverse impact on these wildlife sites, particularly with regards to Recreational Disturbance (RD). Officers will need to demonstrate</p>

	<p>that they have followed the AMCH when selecting sites for development.</p> <p>Theoretically, most of the sites being promoted for development on the Hoo Peninsula should only be selected as a last resort once other development options within the Local Plan area have been exhausted.</p>
<p>Page 12 and 13. Paragraph 5.7</p> <p><i>“Work to date has highlighted some critical constraints. National Highways has indicated that there is insufficient capacity in parts of the Strategic Road Network to accommodate significant growth. National Highways has identified capacity and safety concerns with M2 Junction 1. Although this is outside of Medway’s boundary, it is a key junction for the area, and many residents and workers travel through this junction regularly. There are no plans to upgrade this junction as part of National Highway’s plans for the Lower Thames Crossing (LTC). Without a clear scheme in place to address these issues, development of jobs and homes across north and mid-Kent will be stymied. The Council is working with neighbouring authorities and wider stakeholders to prioritise action on M2 Junction 1. This matter would need to be addressed in the Local Plan, with policies showing how impacts could be mitigated and improvements delivered.”</i></p>	<p>We agree with this statement.</p> <p>It's important to point out that the Council's £170m Housing Infrastructure Fund (HIF) Project did not deal with these critical constraints, particularly the M2 Junction 1. In other words, even if infrastructure capacity was improved for journeys on and off the Hoo Peninsula, there would still be an infrastructure capacity issue for when most of this vehicle traffic approached the M2 Junction 1 from all directions.</p> <p>The capacity issue at the M2 Junction 1 is a critical constraint for potential development allocations on the Hoo Peninsula and this will need to be taken into account before selecting sites. It may not be possible to fully mitigate the impacts of development on the M2 Junction 1 as adequate improvements may not be physically possible or financially viable.</p> <p>The constraints within the Local Plan area may create a ceiling on the amount of growth that can actually be permitted in order to achieve Sustainable Development.</p>
<p>Page 13. Paragraph 5.8 and 5.9</p> <p><i>“In addition to this current issue, further transport impacts are expected with the development of the LTC. The LTC is focused on a defined scheme for its primary route and tunnel. The scheme does not provide for improvements that may be needed to parts of the surrounding roads network that would be impacted as a result of the new crossing. The new crossing is forecast to generate new trips, as well as re-routing existing journeys, as drivers divert from Dartford.”</i></p> <p><i>“This is a particular concern for Medway, as the modelling assumptions used in planning for the LTC underestimate the amount of development growth that would be expected in the new Local Plan. There are concerns that the road network will not have the capacity to accommodate the higher levels of homes and jobs planned in Medway. This raises uncertainty for the capacity of the highway network to meet the full scale of development needs over the plan period. This could be a strategic constraint to development and the Plan would need to reflect lower levels of growth in Medway, with the consequent impact on delivery of new jobs and homes to Medway’s need and related affordability of homes.”</i></p>	<p>We agree with both statements.</p> <p>The potential impacts from the proposed Lower Thames Crossing (LTC) on the Strategic Road Network (SRN) and Local Road Network (LRN) is a critical constraint. This is a particular issue for the Hoo Peninsula and Strood with the potential impacts on the M2 Junction 1, Wainscott By-pass (A289) and Four Elms Roundabout. Traffic flow graphics from various consultations on the LTC show significant increases in traffic flows/trips on these roads and junctions.</p> <p>As matters stand, there will not be the highway transport capacity to accommodate promoted growth on the Hoo Peninsula and Sustainable Development would not be achieved. The harms of permitting development would significantly and demonstrably outweigh the benefits of providing housing in this location. National Highways and Active Travel England are already submitting holding objections to live planning applications on the Hoo Peninsula.</p> <p>Officers should strongly demonstrate to an inspector at Examination that the Council has a genuine and justified reason for bringing forward a Local Plan that reflects lower levels of growth - because of the significant constraints to growth that exist and the potential inability to adequately mitigate impacts.</p>

<p>Page 13. Paragraph 5.10</p> <p><i>“Further consideration will be given to potential impacts on the environment, especially the designated habitats and landscapes which form a large part of Medway’s area, and strategic infrastructure needs. The Council will need to assess how negative impacts can be avoided, or mitigated, such as through delivery of new services.”</i></p>	<p>We partly agree and partly disagree with this statement.</p> <p>We believe potential impacts on the environment should be the primary consideration at the forefront of the site selection process. As mentioned previously, Officers will need to demonstrate the Avoid, Mitigate and Compensate Hierarchy (AMCH) has been followed when selecting sites.</p> <p>Negative impacts should be avoided first by pursuing alternative options/sites/locations for development that reduce or eliminate such impacts. Sites where development would negatively impact nearby designated habitats should be selected as a last resort once other development options within the Local Plan area have been exhausted.</p>
<p>Page 13. Paragraph 5.11</p> <p><i>“In addition to assessing how to meet Medway’s needs for 28,500 new homes over the Plan period, the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham’s housing needs, following a request from the neighbouring borough.”</i></p>	<p>INTEREST DECLARATION: Cllr. Michael Pearce is employed by Gravesham Borough Council.</p> <p>We agree with this statement.</p> <p>Depending on the outcome of the site selection process and Sustainability Appraisal (SA), there may be a need for Medway Council to request other local authorities, such as Swale Borough Council, to consider providing additional suitable sites to meet this Council’s housing needs.</p>
<p>Page 14. Paragraph 5.14</p> <p><i>“This is a high level of need and the Council has carried out a comprehensive and iterative review of potential sources of land for development allocations. The Council has produced a Land Availability Assessment (LAA) to be published with this consultation document. The LAA has been informed by a Call for Sites, where the Council invited developers, landowners and other parties to put forward sites for consideration as potential development allocations. Planning officers also identified sites from other sources, such as development briefs, the Brownfield Land Register and withdrawn planning applications. An initial high-level assessment has screened out sites that are too small. Further work will consider the scope for overcoming constraints to achieve sustainable development.”</i></p>	<p>We agree with this statement.</p> <p>Officers have published the latest Strategic Land Availability Assessment (SLAA) document, consisting of thousands of pages, a week or so into the Regulation 18 consultation period. We would like to provide a detailed representation concerning this document, including a desktop appraisal of sites.</p> <p>However, because of the amount of work required, this will be submitted after the deadline for the Regulation 18 consultation. Officers should consider an extension to the consultation because of the delay in publishing the SLAA.</p>
<p>Page 14 and 15. Paragraph 5.15</p> <p><i>“The LAA has identified land with the potential capacity for c.38,200 homes, which will proceed to the next stage of detailed assessment, along with the Sustainability Appraisal process. Many of these sites are subject to constraints, including environmental considerations, infrastructure requirements and viability. It is likely that many of these sites will not be found suitable, available and achievable for sustainable development and will be removed at the next stage of assessment and Sustainability</i></p>	<p>We agree with this statement.</p> <p>The scale of development being promoted on the Hoo Peninsula will have a significant impact on internationally and nationally designated habitat and wildlife sites locally, particularly with regards to Recreational Disturbance (RD).</p> <p>It may not be possible for these impacts to be mitigated, including by Strategic Environmental Management Schemes (SEMS), and therefore the harm should be firstly avoided by allocating the development elsewhere in the Local Plan area.</p>

<p><i>Appraisal. A range of mitigation measures will be required to achieve the scale of housing needed for the Plan. The scale of proposed growth is anticipated to have significant impacts across Medway. This level of housebuilding would mean the transformation of urban centre and waterfront areas and large-scale development in suburban and rural areas.”</i></p>	
<p>Page 15. Paragraph 5.16</p> <p><i>“The Council has identified four broad categories of locations where development could take place, reflecting Medway’s geography. Indicative housing capacities from the LAA for the different areas are presented for each category (Note, this is NOT allocating numbers to allocated sites but merely reflects the LAA):”</i></p>	<p>We agree with this statement.</p> <p>This document makes very clear that this isn't a Regulation 18 consultation on site allocations, reasonable alternative scenarios or a preferred spatial strategy at this stage.</p> <p>However, Officers should work towards creating a number of different spatial strategy options and for these scenarios and reasonable alternatives to be judged against the Sustainability Appraisal (SA) and published as a Regulation 18 consultation. From this a preferred spatial strategy should then be selected and taken through to Regulation 19 as the draft Local Plan.</p> <p>The intention by Officers to move straight to a Regulation 19 draft Local Plan consultation next year, following this very early stage in the process Regulation 18 consultation, is too optimistic and may create a vulnerability with the Local Plan being challenged and NOT being found ‘Sound’ at Examination.</p>
<p>Page 15. Paragraph 5.16</p> <p>*Potential Housing Capacity (from LAA) table*</p>	<p>What is immediately clear from this table is the need to allocate sites for 19,173 new houses over the Local Plan period can potentially be met with the Urban Regeneration (11,151 houses) and Suburban Growth (9,680 houses) category sites alone.</p> <p>In other words, no Rural Development category sites need to be allocated to meet the housing need over the Local Plan period. This is especially significant when considering that Officers will need to demonstrate they have followed the Avoid, Mitigate and Compensate Hierarchy (AMCH), with regards to the Hoo Peninsula’s sensitive wildlife areas, when selecting sites for the Local Plan.</p> <p>Because of the significant environmental constraints locally, site selection should be predominantly weighted towards urban regeneration and suburban growth sites as a first priority.</p>
<p>Category: Urban Regeneration</p>	
<p>Page 16 and 17. Paragraph 5.19</p> <p><i>“The new Local Plan will draw on the existing policies, strategies and programmes that promote the regeneration of Medway’s urban centres and waterfront. This work creates a supportive policy environment for redevelopment in these areas. In drawing up the growth strategy for the new Plan, the Council’s starting point is regeneration and making</i></p>	<p>We agree with this statement.</p> <p>Apart from the Chatham Docks allocation for either residential development or commercial/industrial development, the remaining sites of the Urban Regeneration category is the least politically controversial area of the Local Plan area.</p> <p>We agree with Officers that the starting point for allocating sites should be those within the Urban</p>

<p><i>the best use of vacant or under-utilised brownfield land. Sites which are already identified in Council documents such as the town centre masterplans for Chatham, Gillingham and Strood, and development briefs for Strood Waterfront, are likely to be included as site allocations in the new Local Plan. Such sites could deliver thousands of homes, as well as commercial floorspace for businesses and services and contribute to our wider strategies for supporting our high streets and centres in adapting to wider changes in retail patterns.”</i></p>	<p>Regeneration category. These sites are all brownfield sites or Previously Developed Land (PDL) with no environmental designations.</p> <p>These sites will still need to score highly when judged against the Sustainability Appraisal (SA) and be viable and achievable.</p>
<p>Page 17. Paragraph 5.21</p> <p><i>“In addition to these sites, the Council is also considering the potential for wider development in urban waterfronts. Land has been promoted for redevelopment at Chatham Docks and Medway City Estate. These large sites could provide for new homes as well as workspace for businesses and services. Such major redevelopment would have a marked impact on the area and would involve the relocation of existing businesses.”</i></p>	<p>We oppose the residential development of Chatham Docks. This site should be retained for commercial/industrial use. Understanding that the provision for 3,000 flats would need to be provided elsewhere within the Local Plan area.</p> <p>We support the residential development of brownfield or Previous Developed Land (PDL) sites within the Medway City Estate. These would need to score highly on the Sustainability Appraisal (SA) and not harm the environment or habitat sites.</p> <p>The demand for commercial/industrial space may be met with sites at Kingsnorth and Grain on brownfield land or Previously Developed Lane (PDL). These would need to score highly on the Sustainability Appraisal (SA) and not harm the environment or habitat sites. There will also need to be available transport infrastructure capacity.</p>
<p>Category: Suburban Expansion</p>	
<p>Page 20. Paragraph 5.29</p> <p><i>“This category considers the areas for potential growth adjoining the existing urban areas to the south and east of Medway. These are largely located to the north and east of Rainham and in the Capstone and Hempstead area to the south. The existing suburban neighbourhoods are home to many of Medway’s residents, and key services and employment areas. The undeveloped land around the suburbs is valued as a contrast to the large urban conurbation, providing important green lungs within an otherwise dense urban area and includes the popular country parks at Capstone and Riverside. Historically these areas have been important for farming, such as the north Kent fruit belt, from which the county gets its recognition as the Garden of England. There are key landscape links to the estuary in the north and the Kent Downs to the south. Car ownership rates are higher in this part of Medway, and there are congestion hotspots on the highways network, particularly along the A2.”</i></p>	<p>We agree the existing suburban neighbourhoods are home to many residents and particularly key services and employment areas. The sites being promoted within the Suburban Expansion category are also close to existing town centres, railway stations and the Strategic Road Network (SRN), such as the M2 motorway.</p> <p>The suburbs in this part of the Local Plan area do indeed benefit already from popular country parks at Capstone and Riverside. This isn’t currently the case with the Rural Development category area and the sites being promoted for development there.</p> <p>From a baseline position and in terms of access to existing country parks alone (significant green spaces), the sites within the Suburban Expansion category area should score more highly for selection than the sites within the Rural Development category area. The same could also be argued for access to existing services, employment areas, town centres, railway stations and the Strategic Road Network (SRN).</p> <p>Unfortunately, the suburbs have lost much of its historic farming economy and general association with the Kent fruit belt and being recognised as part of the Garden of England. However, this certainly isn’t the case for the Rural Development category area</p>

	<p>with its existing strong agricultural economy, particularly on the Hoo Peninsula.</p> <p>We agree the area of Capstone and East Rainham is situated next to the Kent Downs and wider Kent countryside. Metaphorically speaking, the Medway Council border with Kent County Council is not a hard international crossing and therefore residents from the Medway Towns within the suburbs can and do benefit from the greenspaces, landscapes and countryside that surrounds the Medway Council border.</p> <p>Although development of sites within the Capstone Valley and East of Rainham will reduce the landscape within the boundary of the urban area of Medway Council, suburban residents will still continue to access and benefit from the substantial and vast landscape immediate beyond Medway Council's border.</p> <p>The situation on the Hoo Peninsula is completely different as it has a more restricted landscape - the peninsula is physically and geographically bordered on three sides by the River Thames and River Medway. This isn't the case with the suburbs.</p> <p>We don't dispute that car ownership rates are high within the suburbs. Car ownership for the Local Plan area in general is higher than national and regional average. However, car ownership is highest within the Rural Development category area and this can be substantiated with the latest Census data.</p>
<p>Page 21 Paragraph 5.32</p> <p><i>“Much of the land around the north and east of Rainham is the best and most versatile farmland, although many fields are not in active agriculture use. The area to the south is within the setting of the Kent Downs Area of Outstanding Natural Beauty, and undeveloped land forms an important component of our green infrastructure networks. The area to the north lies close to the Medway Estuary, which is designated a Special Protection Area, Ramsar site and Site of Special Scientific Interest, recognising its international and national importance for wildlife.”</i></p>	<p>We agree with this statement.</p> <p>We are equally concerned with the sites being promoted for development in North Rainham as this development will be very close to the Medway Estuary and Marshes Special Protection Area (SPA), RAMSAR site and Site of Special Scientific Interest (SSSI).</p> <p>These are some of the same habitat sites we believe are threatened by the impacts of proposed development on the Hoo Peninsula, particularly around Chattenden, High Halstow and Hoo.</p> <p>Officers must recognise the sites being promoted for development within Capstone do not have the same environmental impact constraints as the sites being promoted for development in North Rainham and on the Hoo Peninsula. On this basis alone, new development allocations on greenfield sites should be weighted towards Capstone in the first instance.</p> <p>The environmental impact scoring using the Sustainability Appraisal (SA) should reflect this.</p>
<p>Page 21. Paragraph 5.33</p> <p><i>“The A2 is an important transport corridor, but experiences congestion and has been designated an</i></p>	<p>We agree with this statement.</p> <p>However, wherever development is allocated in the Local Plan area there will be transport impacts. Because of the scale of growth required to meet the</p>

<p><i>Air Quality Management Area. There is a risk that major development in these suburban locations could generate further dependencies on car-based travel, adding to congestion and pollution, and undermining Medway's ambitions for sustainable development. Much of the potential development south of the M2 is anticipated to travel towards the M2 via junction 4 which may need to be improved to accommodate additional traffic."</i></p>	<p>housing need, these impacts will be significant and could be demonstrable - outweighing the benefits of the proposed development.</p> <p>The difference with the Suburban Expansion category area, compared to the Rural Development category area, is the suburban sites being promoted for development are closest to the Strategic Road Network (SRN), such as the M2 motorway, as well as existing mainline railway links and stations.</p>
<p>Page 21. Paragraph 5.34</p> <p><i>"Although potential sites could be developed in proximity to existing towns and neighbourhoods, there is not sufficient capacity in existing services, such as schools and health services, to cater for an increased population. New housing would need to make provision for expanded and new services. Similarly, schemes that focus on homes and not jobs and services could result in unsustainable development and increase people's need to travel."</i></p>	<p>We agree with this statement.</p> <p>However, the exact same could also be said for the Rural Development category area and the sites being promoted around Chattenden, High Halstow and Hoo.</p>
<p>Page 21. Paragraph 5.35</p> <p><i>"Land in this area lies close to Medway's boundary with neighbouring authorities, particularly Swale and Maidstone. Development in these locations would potentially have a cross-border impact. Development to the east of Rainham would erode the strategic gap between Rainham and Newington and add further to the congestion and pollution issues on the A2. Development to the south around the Capstone Valley would potentially adjoin the development of the proposed 'Lidsing Garden Community' in Maidstone. The landowner is promoting a cross-border masterplan. There are a number of potential impacts, including transport, infrastructure and the natural environment."</i></p>	<p>We partly agree and partly disagree with this statement.</p> <p>We agree there will be cross-border impacts of development within the suburbs and we agree there is a requirement for cross-border planning. We don't consider cross-border working to be a constraint or significant obstacle to creating Sustainable Development.</p> <p>In terms of erosion of strategic gaps or green buffers between settlements, the exact same could also be said for the Rural Development category sites. For example, the land in-between Chattenden and Hoo is being promoted for development and this would completely erode the Chattenden Valley - which is a locally valued landscape.</p>
<p>Category: Rural Development</p>	
<p>Page 22. Paragraph 5.36</p> <p><i>"Although Medway is largely an urban authority by population, the majority of its land is rural. Much of the countryside is on the Hoo Peninsula to the north of the borough, as well as the Medway Valley to the south west. Rural Medway is markedly different in character to the urban towns and neighbourhoods. The villages in the Medway Valley sit within the setting of the Kent Downs and the river. The Hoo Peninsula sits between the Thames and Medway estuaries. Much of the periphery of the peninsula is designated as Special Protection Areas (SPAs) and Ramsar sites, recognising its international importance for nature, particularly migrating birds. There are further Sites of Special Scientific Interest (SSSI) across the peninsula, which are of national importance. The coastal marshes and mudflats and areas of woodland shape the distinctive character and feel of the peninsula. These landscapes are</i></p>	<p>We agree with this statement.</p> <p>It's correct to say the villages in the Medway Valley sit within the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB) designation. However, it's important to highlight that this area and a large part of the Hoo Peninsula are geographically part of the North Downs. The Kent Downs AONB is a designation and the North Downs is a geographical/topographical area - partly designated as an AONB.</p> <p>The ridges of chalk hills that make up the North Downs extends through Cliffe and onto the Hoo Peninsula. There are a number of chalk and aggregate quarries around Cliffe and a number of healed ridges run through the spine of the Hoo Peninsula. These healed ridges are thought to be the Anglo-Saxon origin of the word 'Hoo'.</p>

<p><i>valued for their sense of place and remoteness, all the more special, given their proximity to urban Medway.”</i></p>	<p>The Hoo Peninsula is surprisingly hilly to many visitors and the landscape becomes much flatter and more open as you head towards the Isle of Grain.</p> <p>Officers will be aware of our aspiration for the Hoo Peninsula to be designated as an Area of Outstanding Natural Beauty (AONB) and a natural extension to the Kent Downs AONB.</p>
<p>Page 22 and 23. Paragraph 5.37</p> <p><i>“The peninsula includes areas of the best and most versatile land for agriculture, and there is a strong farming presence. However, the area is also characterised by wider industries, particularly the legacy of the energy sector at Grain and Kingsnorth. These two large brownfield sites form an important part of Medway’s employment land supply and offer unique opportunities for further jobs growth such as realising opportunities for green technology as the country moves to zero-carbon.”</i></p>	<p>We agree with this statement.</p> <p>However, we disagree with the suggestion that the Hoo Peninsula is largely characterised by industry, particularly the energy sector at Grain and Kingsnorth.</p> <p>Both major power stations at Grain and Kingsnorth have been demolished in recent years. These structures, particularly the chimneys, were synonymous with the Hoo Peninsula. The industrial landscape of the Hoo Peninsula has reduced significantly over time and this has resulted in a softer and more aesthetic vista.</p> <p>Perceptions of the area have also changed dramatically over recently years. The Hoo Peninsula is no longer associated with heavy industry and is instead now strongly associated with wildlife and the natural world.</p> <p>That said, we recognise that the Hoo Peninsula is home to two large brownfield sites and there is now the opportunity for these sites to be developed in a softer, more biodiverse and more landscaped way. We don’t believe these brownfield sites detract from the natural qualities of the Hoo Peninsula.</p>
<p>Page 23. Paragraph 5.38</p> <p><i>“There are a number of villages on the peninsula, with the largest being Hoo St Werburgh. Hoo has a population of over 10,000 people and provides services, such as schools and sports facilities to the wider villages on the peninsula. However, many residents travel off the peninsula to reach workplaces, shops and other services. There are high levels of car ownership and public transport services are limited in a number of areas.”</i></p>	<p>We agree with this statement.</p> <p>There are very high levels of private car ownership, as substantiated within the latest census data. Private car ownership on the Hoo Peninsula is higher than the national average and regional average. Public transport, particularly buses, is very poor and unattractive for local residents. Coach services, until recently, used to operate on the Hoo Peninsula - these services would transport commuters into London and back.</p> <p>Four Elms Hill is an Air Quality Management Area (AQMA) and suffers from severe congestion at peak times. The main route on and off the Hoo Peninsula is highly vulnerable and sensitive to congestion and gridlock.</p>
<p>Page 23. Paragraph 5.39</p> <p><i>“The vast majority of sites that have been put forward for potential development in rural Medway (outside of the Green Belt designation) are on the Hoo Peninsula. Most of the sites are promoted for housing led development, with the exception of the larger employment sites. It is noted that many of the sites promoted for development on the Hoo</i></p>	<p>We agree with this statement.</p> <p>However, although a number of sites being promoted for development on the Hoo Peninsula are large scale, the vast majority of sites being promoted and the vast majority of housing development capacity is indeed off the Hoo Peninsula in other parts of the Local Plan area.</p>

<p>Peninsula are large scale, each potentially providing land for hundreds of homes.”</p>	
<p>Page 23. Paragraph 5.40</p> <p><i>“There is significant land for potential development for homes, jobs and services on the Hoo Peninsula. The Council has recognised this potential through its work on the Local Plan, and considering options for how Medway can grow in the future. The Council has considered the potential for large scale growth on the peninsula through its work on the draft Hoo Development Framework which was published for consultation in 2022. The Housing Infrastructure Fund (HIF) programme sought to deliver improvements to transport and put measures in place to strengthen the local environment. These would provide certainty in planning for future development in the area, and in assessing sites across Medway in the context of constraints and possible mitigations in preparing the Local Plan.”</i></p>	<p>Although there is a large amount of land being promoted for development on the Hoo Peninsula, this doesn’t automatically mean that this land in question, if developed, will constitute Sustainable Development.</p> <p>The Council has been attempting to create a new Local Plan, with significant development on the Hoo Peninsula at its heart, for some time. This focus on the Hoo Peninsula has resulted in two Local Plans being found ‘Unsound’ at Examination, and more recently, a draft Local Plan being tabled but later withdrawn before a Council meeting.</p> <p>A common theme throughout these episodes has been a lack of comprehensive evidence to support and justify a growth/development focus on the Hoo Peninsula. Particularly, the lack of evidence to discount other spatial strategy options in the Local Plan area.</p> <p>Officers have outlined within the Hoo Development Framework (HDF) document itself very clearly that this work does not constitute planning policy. As discussed previously, the Council does NOT currently have a preferred strategy or a list of preferred sites and the Local Plan work to date carries little to no weight in planning terms.</p> <p>This of course unhelpfully won’t stop landowners and developers on the Hoo Peninsula attempting to attribute weight to the work the Council has produced to date - in order to try and justify their development sites.</p>
<p>Page 23. Paragraph 5.41</p> <p><i>“In the absence of the HIF funding programme, the opportunities and issues still remain key considerations in the preparation of the new Local Plan. Large scale development around Hoo St Werburgh and neighbouring villages could provide for planned growth, where new housing is supported by new and improved services and infrastructure. Such development could also help to meet the Council’s ambitions for greener growth, with higher environmental standards in construction, communities better connected for walking and cycling, and within easy reach of local services.”</i></p>	<p>Officers will be fully aware of the clear link between the scale of growth being promoted by landowners/developers on the Hoo Peninsula and the critical requirement (this isn’t optional) for significant infrastructure and environmental mitigation (even compensation) for this development to actually come forward and be built.</p> <p>The scale of growth being promoted on the Hoo Peninsula can’t happen without significant infrastructure and environmental mitigation/compensation. These issues represent a critical constraint to growth in this area.</p> <p>Arguably, other parts of the Local Plan area do not share these same constraints.</p>
<p>Page 23. Paragraph 5.42</p> <p><i>“The peninsula also has a key role in Medway’s economic development strategy, with major sites at Grain and Kingsnorth offering potential for new employment sectors and being regional hubs in energy and green technology industries, contributing to de-carbonisation of the economy. The area’s</i></p>	<p>We agree with this statement.</p> <p>We generally support the development of the large-scale Previously Developed Land (PDL) sites at Grain and Kingsnorth, within their existing brownfield envelopes. We don’t support these areas expanding onto ‘fresh’ greenfield sites. Officers will be fully aware of the current situation and conflict on this</p>

<p><i>environment also offers opportunities to develop green tourism, based on assets such as the estuaries and the spectacular shows of birdlife. Agriculture will continue to be an important land use for the peninsula.”</i></p>	<p>issue between Berkley Modular and Uniper at Kingsnorth.</p> <p>Development at Grain and Kingsnorth are still subject to significant transport infrastructure and environmental impact constraints. We believe it’s simply not possible for there to be significant commercial/industrial development at Grain/Kingsnorth AND significant housing development on the Hoo Peninsula as well.</p> <p>We support the idea of increasing green tourism on the Hoo Peninsula in order to showcase our beautiful and fantastic wildlife. However, this does come with its own risks, including Recreational Disturbance (RD), and it will need to be handled very carefully.</p>
<p>Page 24. Paragraph 5.43</p> <p><i>“The Hoo Peninsula has significant potential for further development, as part of Medway’s wider growth in coming decades. This is shown in the extensive number of sites promoted for development on the peninsula, and the scale of potential sites. However, there are a number of specific considerations for development on the peninsula.”</i></p>	<p>We accept a large number of sites are being promoted for development on the Hoo Peninsula by landowners/developers – this has been the case for a considerable amount of time.</p> <p>However, we believe the potential of many of these sites actually coming forward and being developed is too farfetched, in terms of achieving Sustainable Development and being approved (either by the Council, on Appeal or at Inquiry).</p> <p>The impacts of allowing development on the Hoo Peninsula would significantly and demonstrably outweigh the benefits, especially if alternative locations for the development currently exist.</p>
<p>Page 24. Paragraph 5.44</p> <p><i>“The area’s special and distinctive environment is a primary consideration. The Local Plan will set out a strategy, not just for development, but also for strengthening our green infrastructure networks and sites. Biodiversity, landscape, and water management are just some of the key matters in environmental planning. The Council will assess the potential impacts of possible development sites on different aspects of the natural environment, with specific attention to the designated areas, such as SSSIs and the SPAs.”</i></p>	<p>We agree with this statement.</p> <p>We particularly welcome Officers ensuring the Hoo Peninsula’s environment, and designated habitat sites, are a primary consideration. This should be the primary consideration for the entire Local Plan area, particularly with regards to the selection of sites and the requirement to follow the Avoid, Mitigate and Compensate Hierarchy (AMCH).</p> <p>Applying the AMCH when selecting sites is not constrained to the boundaries of the Hoo Peninsula. The entire Local Plan area needs to be considered, particularly with regards to avoiding harm by allocating an alternative site.</p>
<p>Page 24. Paragraph 5.45</p> <p><i>“A further strategic consideration is the capacity of infrastructure to support major growth on the Hoo Peninsula. Transport networks would need to be upgraded. The roads network is limited, with particular concerns on the capacity of Four Elms roundabout and congestion on the adjoining roads, which exacerbates air pollution. Bus services reflect the rural nature of the area, with reduced frequency compared to urban Medway. The Council will require major transport schemes to provide for sustainable transport choice and increase the capacity of the</i></p>	<p>We agree with this statement.</p> <p>However, infrastructure capacity is not a consideration. It is a critical requirement in order to achieve Sustainable Development, particularly with regards to any potential residential or commercial/industrial growth on the Hoo Peninsula.</p> <p>We agree that major transport schemes will need to be put in place, with significant increases in transport capacity delivered, before any promoted development is considered on the Hoo Peninsula.</p> <p>However, the costs of these infrastructure capacity improvements may not be viable due to little amount</p>

<p>road network, to facilitate growth on the Hoo Peninsula.”</p>	<p>of Section 106 contributions raised from potential development. In other words, without significant Government financial intervention, large-scale growth on the Hoo Peninsula is not realistic or feasible in sustainable terms.</p>
<p>Page 24. Paragraph 5.46</p> <p><i>“Similarly wider investment is required in wider services, such as schools and health and leisure facilities, to support larger communities, as the existing infrastructure reflects the area’s rural character and villages. Large scale growth would need careful planning for phasing and design to provide for sustainable development.”</i></p>	<p>We agree with this statement.</p> <p>There is a significant infrastructure requirement to increase capacity in transport and services locally. Plus, there is a significant environmental mitigation and compensation requirement to protect local habitat sites. Both of these in combination result in a critical constraint to promoted residential and commercial/industrial growth on the Hoo Peninsula as the area is not currently a sustainable location.</p> <p>We believe the simple reality of our local geography, being a peninsula restricted on three sides, makes it completely impossible for the scale of growth being promoted to become reality, without herculean financial intervention and changes. From a national perspective, the cost of doing this is not worth the growth (although significant and large-scale) being promoted locally.</p>
<p>Category: Greenbelt Release</p>	
<p>Page 25. Paragraph 5.47</p> <p><i>“There is a common confusion with the technical jargon used in Planning between Green Belt and greenfield land. Green Belt is a specific policy designation around major cities. Greenfield is used to refer to undeveloped land, like fields, in contrast to brownfield sites, which have previously been developed. National planning policy attaches great weight to Green Belt policy which places limits on development. Greenfield sites do not have the same level of protection in national planning policy.”</i></p>	<p>We agree with this statement.</p> <p>We understand the difference between greenbelt land and greenfield land. However, greenfield agricultural land, or undeveloped land, does have its economical, food security and environmental value. Greenfields can form part of a valued landscape, such as the Chattenden Valley between Chattenden and Hoo. Greenfield agricultural land also provides a buffer between settlements to stop coalescence.</p>
<p>Page 26. Paragraph 5.51</p> <p><i>“In the context of high levels of housing need across Medway and neighbouring boroughs, Councils are looking at all options for how they can provide for sufficient homes in their Local Plans. The boroughs of Gravesham and Tonbridge and Malling both have high levels of land covered by the Green Belt designation. The Lower Thames Crossing is proposed to the east of Gravesend and this will involve significant change in the area between Gravesend and Strood. This context of major infrastructure investment needs to be considered in reviewing potential release of land in the Green Belt. In work on its emerging Local Plan, Gravesham Borough Council has identified a potential development allocation immediately to the west of Medway, near Strood. This would significantly narrow the Green Belt land in this location, and impact on the function of the remaining Green Belt land adjoining Strood in Medway. Developers are promoting separate sites in both Medway and Gravesham for Green Belt release.</i></p>	<p>INTEREST DECLARATION: Cllr. Michael Pearce is employed by Gravesham Borough Council.</p> <p>We agree with this statement.</p> <p>Despite the greenbelt designation, we can understand why landowners/developers are promoting land for development in this location. These sites are very close to the Strategic Road Network (SRN) and will infill land in between the A289 (Wainscott Bypass) and A2/B2108 (Rede Court Road and Brompton Farm Road) – providing a ‘natural extension’ to the settlement of Strood and Wainscott.</p> <p>However, the significant constraint regarding the capacity of the M2 Junction 1 remains. This junction will be used by any proposed development north of Strood or on the Hoo Peninsula. We agree also that the impacts of the proposed Lower Thames Crossing (LTC) are significant and will affect development proposals in this area and on the Hoo Peninsula.</p>

<p><i>Development in Medway could provide for a limited number of homes, in proximity to transport networks and services in Strood."</i></p>	<p>Officers should be mindful that using arguments to justify allocating sites north of Strood, because they are very close to the Strategic Road Network (SRN), can also apply to the promoted sites for development in the south of Capstone Valley.</p> <p>Because the sites in Strood benefit from greenbelt designation, this suggests the Capstone Valley sites should be prioritised - as these have no greenbelt designation but are very close to the Strategic Road Network (SRN).</p>
<p>Page 26. Paragraph 5.53</p> <p><i>"In addition to the strong policy presumption against development in the Green Belt, much of the land in Medway's part of the Green Belt is also part of the Kent Downs Area of Outstanding Natural Beauty (AONB). The AONB designation and its setting is also afforded significant weight in national planning policy to protect land from major development. The potential cross border proposal in the Medway Valley would have significant impacts on the AONB. The Council would be expected to evidence a case for development in such a location and how landscape impacts could be mitigated."</i></p>	<p>We agree with this statement.</p> <p>Areas of Outstanding Natural Beauty (AONB) should be protected as a priority. We recognise that AONB status doesn't restrict any development, but it does, as highlighted, protect land from major development. We believe the Hoo Peninsula is worthy of AONB designation status and as an extension to the Kent Downs AONB.</p> <p>However, it should be noted that some brownfield or Previously Developed Land (PDL) exists within greenbelt and AONB designated areas. This has been highlighted nationally and it may be suitable to release certain sites within these areas. In other words, AONB status for the Hoo Peninsula wouldn't restrict development of brownfields/PDL at Grain and Kingsnorth.</p>
<p>Employment Sites</p>	
<p>Page 27. Paragraph 5.56 and 5.56.</p> <p><i>"The main employment areas are currently spread across Medway, reflecting historic patterns and the geography of separate towns and villages. Businesses also orientate to sites that meet their needs for access, space, connectivity and services, and in some cases, proximity to linked businesses."</i></p> <p><i>"The plan is to consider the need for more employment floorspace for businesses. The Medway Employment Land Assessment, 2020 indicated a need for c62.3 hectares of employment land up to 2037. The majority of the land would be needed for warehousing and distribution activities."</i></p>	<p>Two paragraphs are numbered 5.56.</p> <p>We agree with these statements.</p> <p>The need for 62.3 hectares of employment land up to 2037 could be accommodated within the existing Kingsnorth brownfield/PDL site envelope alone, without the need to expand onto 'fresh' greenfield agricultural land.</p> <p>There is more than sufficient Previously Developed Land (PD) available at Grain and Kingsnorth to meet this commercial/industrial need. This is of course subject to transport infrastructure capacity upgrades and environmental mitigation/compensation.</p>
<p>Page 27 and 28. Paragraph 5.57</p> <p><i>"A number of sites are being considered through the Land Availability Assessment for employment allocations in the new Local Plan. These include the strategic sites at Grain and Kingsnorth on the Hoo Peninsula, with unique opportunities in specialist sectors, such as energy and green technology, and making use of wharfage facilities."</i></p>	<p>We agree with this statement.</p> <p>However, as mentioned previously, we believe it's simply not possible for there to be significant commercial/industrial development at Grain/Kingsnorth AND significant housing development on the Hoo Peninsula as well.</p> <p>Energy and green technology development has less impact on local transport capacity compared to warehousing and distribution. Energy related development is more favourable and the infrastructure to support this, such as electricity pylons and transformers, exist already.</p>
<p>Page 28.</p>	<p>We agree with these statements.</p>

<p>Paragraphs 5.60, 5.61 and 5.62</p> <p><i>“Transport infrastructure is again a key consideration with employment land. Plans to expand business uses may be challenged by limited capacity on roads, and poor public transport connections. There are specific issues with the Strategic Road Network as highlighted above.”</i></p> <p><i>“In addition, there are impacts on local roads, particularly where businesses involve warehousing and distribution uses.”</i></p> <p><i>“The Council will need to carefully consider the impacts of employment land proposals to provide direction on the capacity of transport networks and the requirements for sustainable travel options.”</i></p>	<p>However again, infrastructure capacity is not a consideration. It is a critical requirement in order to achieve Sustainable Development, particularly with regards to any potential residential or commercial/industrial growth on the Hoo Peninsula.</p> <p>Warehousing and distribution uses will have more of an impact on local transport infrastructure capacity compared to energy and green technologies.</p> <p>We understand there are capacity issues with the electricity grid at Kingsnorth. This is currently restricting commercial/industrial growth without an increase in generation or importation on the site.</p>
Next steps	
<p>Page 29. Paragraph 6.2</p> <p><i>“Following this consultation, the Council will collate all written comments received and analyse them to show the key issues raised and suggestions for the direction and content of the new Plan. The comments will be published on the Council’s website, with sensitive personal information removed. The Council will also publish how it has responded to the issues raised. The consultation comments will be submitted to the independent Local Plan Inspector, when the Council submits the Plan for examination next year.”</i></p>	<p>We welcome and agree with this statement.</p> <p>However, the Council’s ambition to submit a draft Local Plan for Independent Examination by the end of next year is far too optimistic. The Council has restarted the Local Plan process with a new Call for Sites and is consulting on a Regulation 18 consultation document that is very light on detail with no draft policies. There is also a lack of supporting evidence as this is still in production and will take time to process.</p>
<p>Page 29. Paragraph 6.3</p> <p><i>“The Council will use the information collected through the consultation to prepare the next stage of its work on the Local Plan. It will review the vision and strategic objectives for the Plan in the light of the comments raised, and will draw up a strategy for Medway’s growth, based on the options set out in this document. Establishing a vision and strategic objectives will help to select sites for allocation, having identified the range of potential sites available for development through the Land Availability Assessment, which will be integrated with the Sustainability Appraisal.”</i></p>	<p>Following this consultation, the Council should draw up a number of spatial strategies and reasonable alternatives and score these against each other and the Sustainability Appraisal (SA). There will need to be another round of Regulation 18 consultation on these options before progressing to a Regulation 19 draft Local Plan with a preferred option.</p> <p>The Council is at risk of progressing to Regulation 19 too quickly and this may present challengeable grounds to the Local Plan at Independent Examination.</p>
<p>Page 29. Paragraph 6.4</p> <p><i>“The next stage will be the publication of a draft Plan, presenting the policies and site allocations that the Council intends to submit for examination, as its preferred strategy for managing Medway’s growth up to 2040.”</i></p>	<p>As mentioned above, progression to Regulation 19 draft Local Plan may be too soon for the Council following this very early-stage Regulation 18 consultation document. The publication of a draft Local Plan by the end of 2024 is too optimistic.</p> <p>Officers should look at creating and appraising the following broad options for a Regulation 18 consultation:</p> <p>Option 1: Urban Regeneration and Suburban Growth - capacity for up to 20,831 houses.</p>

Option 2: Urban Regeneration and Rural Development - capacity for up to 25,887 houses.

Option 3: Urban Regeneration and a mix of Suburban Growth and Rural Development - capacity for approximately up to 23,359 houses.

These three broad options represent the only realistic spatial strategies and reasonable alternatives that can appraised and scored against each other, particularly on environmental impacts. A preferred option should be then taken forward to the Regulation 19 draft Local Plan stage.

headley, andrew

From: Clare Marshall [REDACTED]
Sent: 22 October 2023 16:49
To: futuremedway
Subject: Local Plan questions reg water, parking, traffic resilience and wildlife

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

Hello

After the recent flooding event in September how is the local plan going to protect the homes and businesses already in Medway as well as any new developments?

The South East is usually a water scarce area in the summer, so how is the new plan going to endure sustainable water management e.g. all properties to have water butts... Buildings designed to use grey water...?

Medway is also a wildlife dessert, so how is the plan going to support the need for 30% of land to be dedicated to wildlife?

The roadworks on Lower Rainham Road and A249 have demonstrated that we do not have a resilient road network. To add houses and population the road network needs a rethink.

Medway is a poor place for parking, so how are you going to get us all walking, cycling and using buses, or providing sufficient parking? Note the ridiculous commute every morning and evening along the A2 to Sittingbourne.

Regards
Clare

MEDWAY LOCAL PLAN 2022 – 2040

Regulation 18 Consultation - 2. Setting the Direction for Medway 2040

September 2023

2. Context - I agree in principle with the ideas expressed in this section.

3. Vision for Medway in 2040

I agree that:-

There is a need to protect Medway's countryside, as well as its urban open spaces.

New uses for high streets need developing.

Former derelict sites should continue to develop as thriving economic hubs.

It should support the continuing use of Medway's farmland to produce quality food as the UK needs to be more self-reliant rather than importing so much food from abroad.

4.Strategic Objectives

I support: -

The need for the plan to prepare for a sustainable, green future. This must include reducing the risk of flooding and to protect all (and especially vulnerable groups) from the impacts of climate change.

I agree that the plan should develop transport, manage the highways network and improve air quality.

The need to protect and ensuring effective management of our natural resources.

That the plan should help and support people to lead healthier lives, it should strengthen our communities by taking account of the needs of people especially those with disabilities, the elderly, young people, those from all minority ethnic communities.

The preservation and enhancement of our green spaces to promote healthy lifestyles for all residents of Medway.

The focus on securing jobs and to develop training and skills.

Development focussing on promoting brownfield land and preserving land within the Green Belt (GB), Special Protection Area (SPA), Ramsar site, Sites of Special Scientific Interest (SSSI) and Areas of Outstanding Natural Beauty (AONB).

5. Developing a Spatial Strategy

I agree with the need to both identify land to be allocated for new development as well as land to be protected, such as Green Belt, SSSI and AONB.

A stronger emphasis on the need to identify land that is suitable for development is needed. Medway should place more emphasis on the use of brownfield land, and a have a

commitment to protect GB, SPA, SSSI, AONB and Ramsar site from any development with clear policies and strategies that enable these sites to be protected from development.

7. The potential impact of the Lower Thames Crossing (LTC) on Medway's roads, including those near Medway's boundary such as the M2 Motorway Junctions 1, 2 and J3, is something which I strongly support- I have concerns that the LTC will create significant additional traffic through villages such as Cuxton, which happens regularly when there is any problem with traffic flow on either the M2 or M20 Motorways, when Cuxton is used as a "rat run" between the two motorways.

14. The Land Availability Assessment (LAA) should not include any land for future development that is within GB, SPA, SSSI, AONB and Ramsar site. I strongly object to any of this type of land being used for any future development.

15. All proposed sites within the GB, SPA, SSSI, AONB and Ramsar should be removed at the next stage of assessment and Sustainability Appraisal. No mitigation measures would be acceptable. Land within the Green Belt for the building of 2,824 houses should be removed from the LAA., Green Belt Land is to prevent urban sprawl by keeping land permanently open.

Urban Regeneration

18. I am in favour of identifying underused Brownfield sites for new development.

22. I support the use of underused and vacant sites in central urban areas to meet the needs of younger and older people.

24. I agree that new housing needs to be connected to good public transport.

27. I strongly agree that the building of new homes must be supported by services, including new schools and health facilities.

Suburban Expansion

32. I would like to see policies for ensuring that farmland is used for food production and I oppose any development in the Kent Downs AONB. During recent years there has been a loss of high-quality farmland in Medway that used to be for food production.

Rural Development

36. I strongly object to any new development within the GB and AONB which might negatively impact these sites.

42. I strongly agree with the need for agriculture to continue to be an important land use for the Hoo Peninsula and the Local Plan should include policies to support this.

45. I agree that new development will need to be supported by improvement to roads and public transport.

46. New development will also need to be supported by additional services such as schools, shops and health facilities.

Green Belt Release

50. I strongly object to any Green Belt releases especially within the AONB.

54. The land proposed for development in Bush Valley, Cuxton should not be released because building new homes on this site would conflict with the fundamental aim of the GB to prevent urban sprawl by keeping land permanently open. I am also very worried about the negative effects of increased traffic on local roads in the vicinity of this site.

The Appeal Decision¹ relating to Vineyard Farms Ltd's proposal to build a winery in this area, referred to the 'effect of the appeal scheme on the landscape character and appearance of the area including the Kent Downs Area of Outstanding Natural Beauty'. It concluded that 'the net effect of the addition of the new road running close to an existing route, both finished as metalled roads would be to urbanise this area of the AONB.' (Appeal Decision para .30) Furthermore, it stated that 'The introduction of the proposed winery into a landscape recognised for its seclusion and intimacy would have a significant adverse impact on the site and its wider landscape'. (Appeal Decision para 35). In my opinion, a development of new homes would have a greater adverse impact on this special site.

In the Appeal Decision the Inspector refers to the major adverse impacts of development which would be experienced by users of the many footpaths in this part of Bush Valley, including the North Downs Way, which he considered to be 'a highly sensitive receptor being a National Trail with historic resonance.' (Appeal Decision para 45)

In the Appeal Decision, the Inspector refers to the Conservation Board's Management Plan which 'recognises that 'peace and quiet' is a quality of the AONB which is identified in the Board's public perception surveys.' Considering the impact of new development on tranquillity, the Inspector argues against introducing 'a range of additional activities which would erode tranquillity further and in so doing undermine the qualities of this part of the AONB.' (Appeal Decision para 58)

Employment Sites

I agree with the need to provide additional employment opportunities in Medway.

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¹ The Planning Inspectorate Appeal Decision, Dated 24 July 2023, Appeal Ref: APP/12280/W/22/3307648 Land south of Bush Road, near Cuxton, Medway, Kent

headley, andrew

From: lyngwiles [REDACTED]
Sent: 31 October 2023 11:38
To: futuremedway
Subject: RE: FW: Local plan

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

Hello

I hope you take the following comments on board and add them to the Medway Local plan consultation.

First I would like to say how hard it has been to obtain a copy of this plan. It's a joke when you ask local people to take part but you do not let the public have a paper copy. I am unable to read large documents on line due to migraines. I emailed for a copy, got informed that a copy is available at my library but I could not take this document home. I was so informed that someone would contact me from the council. No surprise to say that no one called me or sent me a copy. So much for 'consultation'!

It's no wonder people do not participate in such important documents. I also note that when the public actually do respond to consultations you completely ignore or override the outcomes. Medway's 'red route' consultation is a shining example of this but I expect in the long run it will be another cash cow money earner. You state in the press that you have no money and there are reports of the council being bankrupt but you can appear to waste £800k plus on this project.

My thoughts on the local plan. The house/flats that I observe that have been built or are under construction are the slums of the future. Look at the homes built on the Southern Water land near the Wilton Rec or the rabbit hutches 5 blocks at Chatham riverside. Most if these homes will not be 'affordable' as only Londoners will be able to buy them. Salaries in the towns are low and many people are on zero contracts - unable to rent or buy. There is no infrastructure put in place. Our schools, GPs, hospitals, services, dentists, police, water and energy companies are already creaking under the strain.

The section 106 money is a joke as many developers, including Medways development company are reneging or lowering the payments for such projects. They promise everything to get the planning through then say they are not getting enough profit to give this money for community projects. Or they threaten to cease the development altogether, this is black mail. Too much 'green land' is being built on instead of brownfield sites. The quality of new builds are poor and substandard with little regulation. The developers do what they want, even going as far as ignoring planning permission and adding extra flats on to the original agreed plans.

Too many London homeless are being sent to the towns. We have many homeless people of our own and others in emergency accommodation which is costing councils hundreds of thousands of tax payers money which is going to landlords in the private sector.

In regard to the plan. I am against building yet more houses on St Mary's island. Originally the idea for this island was a mix of properties, retail, pleasure and work. Yet Peel and now the council want to remove the only decent paid jobs and build more houses. I am also against properties being built on the green lung at Capstone. We all know this developer has got his way (Medway Magna) to build several hundred on arable land near North Dane. I predict the rest of those fields will be concreted over in the next few years causing more congestion and more strain on our public services. None of these properties will benefit local Medway towns people.

As for Hoo where thousands of houses are being built and developers want to build more. I suggest you sort the already inadequate infrastructure out first. Have you tried getting around the roundabout at the bottom? It should at least have traffic lights installed on the dangerous roundabout. All these properties and one road out. As there is only one road of St Mary's island. We all know the last administration's crazy ideas of a train station at Hoo and local cheap bus services were rubbish and would never happen.

Lyn

Sent from my Galaxy

headley, andrew

From: [REDACTED]
Sent: 22 September 2023 09:42
To: futuremedway
Subject: Re: Hoo Railway passenger services.

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Reg 18 email Responses

I am asking what has happened about the proposed plans for the reopening of The Hundred Of Hoo railway passenger services, that was quietly dropped by the last Council administration. I campaigned for rail services from Hoo. It would seem by what I have read a vocal Minority that didn't want a Rail Service from Hoo have got their own way over and above a Majority of people that live in Hoo that wanted it. [REDACTED]. The Arriva bus service to and from Hoo is diabolical. The service is horrendous!

I gave up driving at the beginning of this year for financial reasons. But since retiring [REDACTED] I find I can now run a car. I am seriously thinking of getting another car again. Which I wouldn't have done if the plan to reopen a Rail Passenger Services from Hoo went ahead, I would most certainly use in conjunction with Buses, as I also have a disabled railcard!
Very disappointed that The Railway Station at Hoo is now not going to happen!

Sent from [Outlook for iOS](#)

headley, andrew

From: Sue Bassett [REDACTED]
Sent: 31 October 2023 11:02
To: futuremedway
Subject: Re: Medway Development Plan Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Reg 18 email Responses

Raymonda

Thank you for the swift reply. The e-mail should have shown the attachment as it did this end! Not sure what might have happened. I have therefore included my comments below rather than as an attachment.

Best regards
Sue

Future Medway Consultation

I am writing in response to the request for comments on the document "Setting the direction for Medway 2040" following attendance at the meeting in Lordswood on 17th October. Thank you for putting this event on and for staffing it with people from the planning group on the Council.

My overarching comments concern the overall capacity of the Medway Towns area to absorb and service the proposed expansion to 2040 without SIGNIFICANT change to the Medway Towns.

The 2021 census figure put the Medway population at approximately 280,000. The Council have put forward plans to deliver 28,500 houses. Working on the census average of 2.4 people per household this would see a population expansion of 68,400 to 2040 or a 25% increase. Services are already squeezed, for example, Medway Maritime Hospital and GPs struggle to meet demand, Southern Eastern water is under performing.

Question: How does the Council propose to increase service provision in hospital (and health more broadly such as GPs, dentist, auxiliary health provision), sewerage, education etc meet this?

Based on the census average of 1.33 cars per household this would mean an extra 100,000 cars in the towns. Of significance is that 33% of households have two or more cars which is relevant when looking at house building. I accept these would not be all on the road at one time, but will be problematic given the congestion issues that already exists, and the parking demands at home and for shopping/leisure/rail stations.

Question: How does the Council propose to meet the additional parking demands and address the additional congestion throughout the Medway Towns that such an increase in car ownership would bring? What measures will the Council introduce to ensure air quality does not drop further especially in the centre of towns where congestion is likely to be highest.

The boundaries between Medway and Maidstone will become more indistinct.

Question: What efforts would be made to ensure Maidstone residents do not chose Medway amenities as they are closer to home, putting additional strain on Medway infrastructure and services.

The Medway Towns can boast areas of special scientific interest and seasonal homes to migrating birds. The North Kent Marsh areas are special and unique.

Question: How will the scale of the proposed increase in the population density be mitigated to prevent adverse effects on these special places.

I have specific concerns about the proposed development of Capstone Valley.

1. Infrastructure demands to service nearly 10,000 houses (possibly up to 24,000 people, 13,000 cars) would be significant. Current roads into Chatham, Maidstone and Hempstead are already congested especially at peak times. Massive road building projects will be required, yet, for example, Luton Road could not realistically cope with higher volumes of traffic and alternative routes are not obvious.

2. The area would be changed beyond its current “green lung” provision in the area, notwithstanding the Capstone Farm Country Park will still be there. Building on this farmland will effectively join up the southern developments between Hempstead, Lordswood and Walderslade where there has already seen expansion over the last few decades.

Susan Bassett



On 31 Oct 2023, at 09:31, futuremedway <futuremedway@medway.gov.uk> wrote:

Good Morning Sue,

Thank you for your email.

Please note that there were no attachments included within your email. We look forward to receiving this shortly.

Kind regards,



<image001.png>

From: Sue Bassett [REDACTED]
Sent: Monday, October 30, 2023 5:16 PM
To: futuremedway <futuremedway@medway.gov.uk>
Subject: Medway Development Plan Consultation

Please find attached comments on “Setting the Direction for Medway 2040”.
Please acknowledge receipt of the comments.
I look forward to hearing more in due course on the outcomes from the consultation and on the specific issues I have raised.

Regards
Susan Bassett



The content Medway Development Consultation response.pages of type has been blocked.

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Medway Local Plan 2040 – Regulation 18 Consultation

October 2023

Consultation Response

Allhallows Parish Council

1.0 Summary

1.1 The parish council recognises the need for an up-to-date Local Plan and the previous attempts to adopt a new plan to replace the existing 2003 Local Plan. Across the plan area, the lack of a plan, the need to define a 5-year land supply for housing and a suitable build-out rate has led to a developer-led expansion of housing, without all of the required infrastructure development before, during or after the housing provision. Necessary road improvements to cater for this growth have been slow to respond. All this at a time when there has been more pressure on medical service provision with a move away from face-to-face appointments to online and phone contact that is not suitable for many residents has not demonstrated the capacity to cope with current demand, let alone any increase in population.

1.2 We recognise that a Local Plan can deliver potential sites for the required infrastructure, but the current economic environment and lack of local, regional, and national funding has meant difficulties in providing this. Although new buildings and extensions can be provided, the need for suitably trained and qualified staffing is also a serious concern and it is noted that this is a national problem (e.g., Doctors require 6 years training, and the existing pipeline will struggle to cope with doctors' retirement projections, let alone the population growth and schools will require a mix of qualified and new staff).

1.3 Previous Medway Local Plans have led to a step change in infrastructure provision with a major investment in road infrastructure, but even this now has serious problems with congestion and air quality. Since previous plans the cost of new infrastructure has ballooned and above the economic scale of local developers and with the priority of house building, permission is often granted without the required infrastructure. There needs to be an urgent need to investigate into [LAND VALUE CAPTURE](#) a method of capturing some of the increase in land values that development brings for larger developments and its suitability for individual or combinations of developments across Medway or in specific areas, to provide key infrastructure improvements (perhaps at smaller scale as well) in the absence of any [Community Infrastructure Levy scheme](#).

1.4 Use of the Hundred of Hoo Freight Railway for passenger traffic could help alleviate some of the pressures, especially if a curve at Hoo Junction to Strood/Maidstone/Rochester/Chatham etc. could be provided.

1.5 The Medway Towns has one of the largest populations in the South East, outside London, but is still expected to take its share of the regional growth – however this is on top of the existing provision!

2.0 Land Availability

2.1 Existing Pipeline

There is already an existing pipeline of developments, outside of the Allhallows Parish, and within the Parish. These have, or are being, developed currently and not included in any of the Regulation 18 consultation maps. Including extensions to the Haven Holiday Park, Kingsmead Park and at the British Pilot. These can cause significant issues during their development (severe disruption to the road network as access and utility infrastructure is developed) and will put additional pressure on the Community Infrastructure.

The Haven Holiday Park has the peak capacity for around 10,000 people. This should be highlighted in the Local Plan as it has a direct impact on the local community facilities especially the road system and medical facilities. Some van owners occupy the site for 9 ½ months of the year and have to leave the site for 2 ½ months (where they need to have another dwelling or may go abroad. It is rated as a business so there is no financial contribution to the Parish Council.

2.2 Call for Sites

A number of sites have been suggested for the Allhallows Parish area: -

- a) Land to the west of Avery Way. There are no suggested housing numbers for the site currently.
- b) Extension of the current Kingsmead residential site, already being expanded by 82 chalets.
- c) Land to east of Binney Road/North of Stoke Road
- d) Land to the west of Binney Road (adjacent to the Allhallows Recreation Ground (owned by Medway Council but leased by the Parish Council.

There will need to be more discussion about the impact of these proposals on the local road and community infrastructure and commitments identified before developments are approved. There are existing parish facilities that will require upgrading and significant development contributions will be necessary to improve these for an enlarged community.

3.0 Pressure on Road Network outside of the Parish Area

There is an indication that major housing developments are being proposed and already on the pipeline around High Halstow, Hoo and Chattenden. Key employment areas are located at Kingsnorth and Grain and are planned to expand. These will cause severe pressure on the A228/A289/Medway Tunnel, local roads into Strood and the M2 Junction 1. Amongst infrastructure improvements are the Four Elms and San Pareil roundabouts where capacity at peak times is already causing significant delays with current air quality issues around the Four Elms hill area that likely to expand without significant interventions.

Any bus public transport provision will be significantly affected at peak periods and throughout the day. Additional housing sites have been proposed in Stoke and St Mary Hoo that will also impact on Ratcliffe Highway, with no infrastructure improvements identified currently.

Bus public transport can be improved by providing a hub interchange in the Hoo area and a more frequent service around the other peninsula villages.

We are concerned regarding the concern raised by Highways England regarding M2 Junction 1 and note that further pressure is proposed at this location if the Lower Thames Crossing is built.

Cllr Chris Fribbins, Clerk Allhallows Parish Council
clerk@allhallowskent-pc.gov.uk

headley, andrew

From: [REDACTED]
Sent: 26 September 2023 14:25
To: futuremedway
Subject: Regulation 18 Consultation – Setting the Direction for Medway 2040
Attachments: 20230926081936_001.jpg

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

To Whom it Mag Concern,

I was wondering if you could help me please? I have registered on the portal to comment on the Regulation 18 Consultation on behalf of my daughter [REDACTED], who has this morning written a letter to the Greenspaces team regarding the green space at the back of our home. Please see the attached letter.

I was wondering if there is any way that any further consideration could be given in the plan, to the maintenance of small 'local' green spaces, to at least provide residents small pockets of usable green space which has basic amenities such as bins and dog foul that can be emptied regularly. Maintaining what we have doesn't really seem to appear much on the plan, but that is just as important as the future redevelopment of spaces to make way for the local government to meet the objectives set by national government.

As I mentioned before, my daughter is [REDACTED] old and already she is seeing these things that need to be improved upon in her local area. She is the future generation and will ultimately be the voice of the area in the years to come. It would be great if her voice could be heard too.

So if there is any way that you can direct me to where I can add her comments and help empower her in being an important contributor to shape the future of Medway, I would really appreciate it.

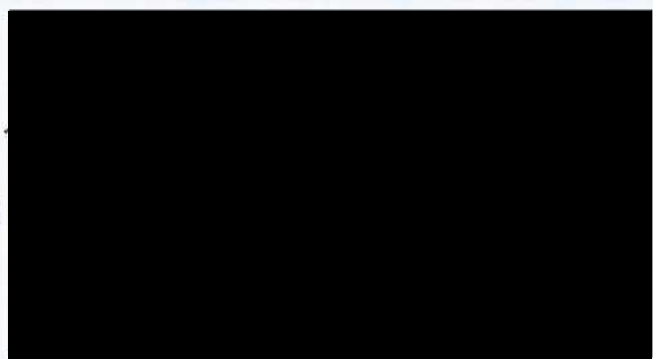
Kind regards,

[REDACTED]

[REDACTED]

Dear green spaces team

Address →

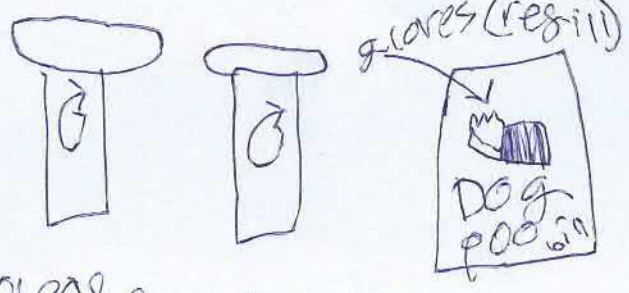


our local park is in a state,
it had a broken light, shirt, bricks and
gas cans AND plastic.

it is behind our house shed.
I can show you there.
we live on

It is sad because I absolutely LOVE that
park. (people drop glass there)

people walk dogs there but drop the poo bags!
please can you put bins for rubbish
and put a dog poo bin situm.



please make my wish come true.
p.s visit our house please)

(can be one person or two) (see on Saturday)

lots of love



I LOVE YOU!!!!!!

headley, andrew

From: [REDACTED]
Sent: 31 October 2023 20:23
To: futuremedway
Subject: Rural Planning Cuxton

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

We realise we need more housing to be built in Medway, but why would Greenbelt land and AONB even be considered for housing. These areas are generally in the surrounding villages ie Cuxton for one example. Over the last few years we have had St Andrews Park and Peters Village built on our doorstep with little thought for infrastructure and no thought traffic on A228 which was extremely busy before these other villages were built. Getting in and out of Bush Rd Cuxton is a nightmare, Bush Road itself is busy especially at school times. The amount of traffic using the A228 causes considerable air pollution which would definitely increase if more houses are built here.

Yours Faithfully

[REDACTED]
Sent from my iPad