



Planning Policy
Medway Council

Date: 31 October 2023

Our Ref: M22/0712.04

Your Ref:

By email only: futuremedway@medway.gov.uk

Dear Sir/Madam

RE:MEDWAY COUNCIL LOCAL PLAN 2022-2040 REGULATION 18 CONSULTATION

I am writing on behalf of my clients, Arpenteur Nightingale Ltd, who are the promoters of the land known as Market Hall. The site is located in central Chatham, off The Brook (A231) (West) and High Street (South). The Northern boundary is formed by Cross Street and Eastern boundary by Upbury Way.

The site currently comprises three main areas. At the northern end, accessed from Cross Street, is a multi-storey car park. The central and southern part of the site comprises a large retail unit with rooftop car park that is connected to the multi-story car park structure (former supermarket and more recently a sports retail outlet), accessed from High Street and The Brook. The North-Western part of the site comprise a former market hall, currently occupied by a furniture retailer.

The site is washed over by policies R1, R2, R3, R12, R17 and ED13 of the Local Plan. These local plan policies and the Chatham town centre masterplan make it quite clear that the site will be considered appropriate for a mix of residential and commercial redevelopment subject to the form of the development and the site layout being directly related to the core area, to contribute to the vitality and viability of the centre as a whole, and provision being made for access by pedestrians, cyclists and public transport users. Policy R3 is the most relevant one as it specifically refers to this site.

The Chatham Town Masterplan November 2019 also identified this site as being suitable for mixed use redevelopment and as being one capable of taking a landmark building

The site is also identified in the draft Arches Neighbourhood Plan (Regulation 16) Consultation on which we have also commented. Within that plan it is also noted that the site is suitable for mixed use albeit we have objected to the limitations expressed therein as to height.

Medway's Building Height Policy is a comprehensive document setting out the way in which new buildings should be considered. It states at para 1.2.2 that:

"Higher buildings are likely to be proposed as part of this growth. If they are in the right place, and are of the highest architectural quality, they could have a role in acting as landmarks that signify the urban renaissance, in forging a new and exciting image for Medway's waterfront regeneration sites, and in delivering more sustainable working and living environments."

The site was recently put forward in the Call for Sites process and is also currently the subject of ongoing pre application discussions with the Council. This is in order to progress a planning application that is being prepared for the site. That application will set out the justification for the demolition of all buildings on site (bar the multi storey car park) and the provision of 5 new buildings providing a mix of commercial on ground floor with residential above. Indicative work has shown that the site has the capacity to provide just under 400 residential units. In addition, commercial space, areas of open space and public

access / realm will provide a high-quality landscape environment to transform the existing closed site into a vibrant and attractive area which will be a catalyst for future regeneration of the wider urban fabric.

National Planning Policy Context

The NPPF sets out at its core the description of sustainable development. This encompasses economic, social and environmental 'pillars', emphasising the need to ensure sufficient land of the right types is available to support growth, innovation and improved productivity. Paragraph 11a) sets out that all plans should *"promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects."*

The Planning Practice Guidance (hereafter PPG) indicates that constraints should not be applied to the overall assessment of development needs, as limitations such as housing market capacity, Green Belt or environmental designations are not relevant to assessing the scale of need, but *"considerations when assessing how to **meet** need"*. It is relevant to note that while Medway has only approximately 5% of its land designated as Green Belt (see paragraph 5.49) which seeks to restrict development, this is not unusual within the South East. Indeed, Medway is significantly less constrained than a number of its neighbouring Kent authorities, many of which have a much higher coverage of Green Belt – for example 77% of Gravesham and 71% of Tonbridge and Malling is covered by the Green Belt designation.

The PPG provides clarity on how local plans are to be produced stating that *"Authorities preparing local plans should assess future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach (except where this has already been dealt with through a spatial development strategy). This involves gathering evidence, carrying out a Sustainability Appraisal to inform the preparation of local plans and effective engagement and consultation with local communities, businesses and other interested parties."* (Paragraph: 034 Reference ID: 61-034-20190315)

The purpose of the statutory Sustainability Appraisal process is to *"to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."* (Paragraph: 001 Reference ID: 11-001- 20190722). This is intended to be an iterative process, undertaken so that the evidence underpinning the plan is tested transparently, with full recognition of potential environmental, social and economic effects.

The PPG then goes on to note that *"Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a plan must do so with the objective of contributing to the achievement of sustainable development."* (Paragraph: 001 Reference ID: 11-001- 20190722).

The preparation of an SA is intended to be an integral part of the preparation of the Local Plan, informing the generation and testing of options. In accordance with the flowchart referenced at Paragraph: 013 Reference ID: 11-013-20140306 the Council ought to be at Stage B of the SA process now, which is *"Developing and refining alternatives and assessing effects."*

Vision for Medway in 2040

The NPPF requires Councils to plan positively to seek opportunities to meet the development needs of the area and as a minimum to provide for objectively assessed needs for housing. This means planning over the long term to meet the needs not only of today's population, but the projected growth of an area and the needs expected to arise over the Strategic Plan period and beyond.

The NPPF sets out clearly at paragraph 22 that *"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.” A vision to 2040 would therefore require the plan to be adopted by 2025 to comply with the minimum 15 year period, which may be tight despite the published timetable in the October 2022 LDS that envisaged adoption by Autumn 2023.

Strategic objectives

We support the overall objectives set out in the consultation to ensure that the new local plan will be able to transform Medway over the plan period and tackle all of the key issues. It is vital that alongside housing development the plan also delivers employment generation as well as the necessary infrastructure, whilst securing protection and enhancement of the landscape and environment.

The Local Housing Needs Assessment (2021) provides the summary of housing need across all sectors with key headlines being:

- Annual need for 870 affordable homes per year (or 55% of overall housing need);
- Need for greater supply of specialist housing for older people;
- 5% of all new dwellings per year to be M4(3) wheelchair accessible

Developing a Spatial Strategy

Th Council acknowledge the challenges that it faces to deliver the Housing need over the plan period stating under 5.3 that the *“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 strategy goes on to set out that the Council are looking at alternative growth scenarios which show lower population growth, albeit recognising the current housing crisis.

Whilst raising concern with the standard method it is of course to be noted that the policies in the local plan are more than 5 years old and as such, in accordance with paragraph 74 of the NPPF, local housing need is to be derived from the standard method and not the local plan. Additional guidance is provided in chapter 68 of the Planning Practice Guidance (PPG): “Housing supply and delivery”. Paragraph 68-001 of the PPG states: *“The standard method for calculating local housing need provides a minimum number of homes to be planned for. Authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach. The Housing Delivery Test measures whether planned requirements (or, in some cases, local housing need) have been met over the last 3 years. The 5 year housing land supply is a calculation of whether there is a deliverable supply of homes to meet the planned housing requirement (or, in some circumstances, local housing need) over the next 5 years.”*

The Housing & Demographics (April 2021) document provides clear evidence of housing completions in Medway between 2001/02 and 2019/20 as shown in the extract below:

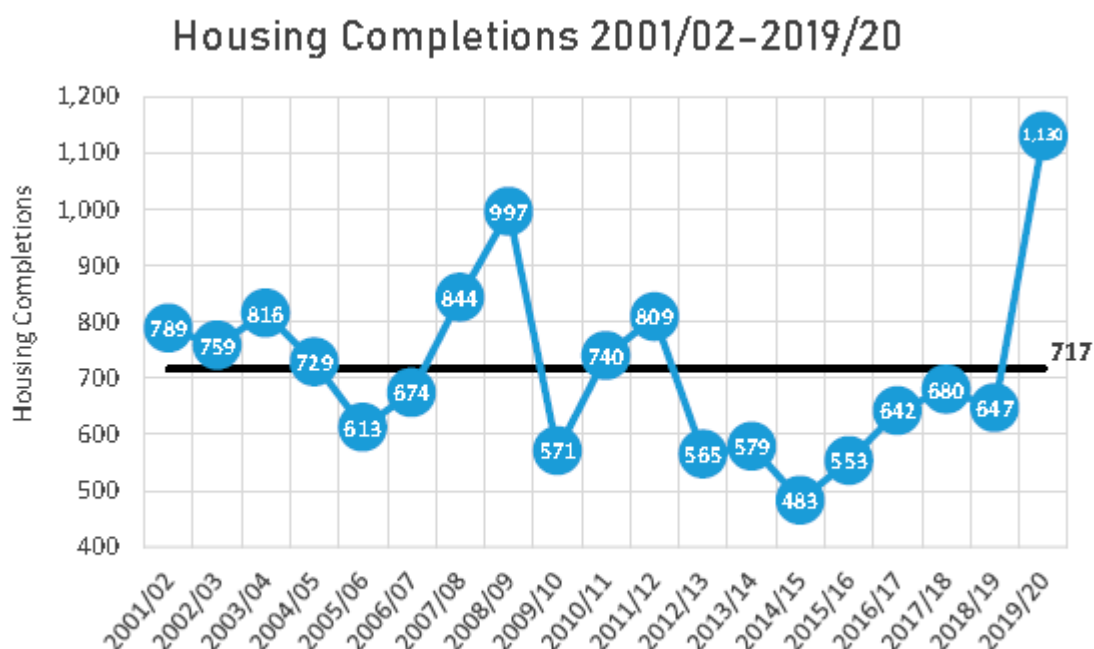


Figure 9: Housing Completions, 2001/02–2019/20 (Source: Medway AMRs³ & MHCLG⁴)

This is a clear picture of the challenge ahead to deliver close to the 1,667 dwellings per annum required.

It is also relevant however to assess the Council's historic performance on housing delivery to provide a clearer picture on the challenge.

No. of homes required			Total	No. of homes delivered			Total	HDT 2018: Measurement	HDT 2018: Consequence
2015-16	2016-17	2017-18		2015-16	2016-17	2017-18			
1341	1322	1334	3997	553	661	669	1883	47%	Buffer

Source HDT 2018 Measurement

No. of homes required			Total	No. of homes delivered			Total	HDT 2019: Measurement	HDT 2019: Consequence
2016-17	2017-18	2018-19		2016-17	2017-18	2018-19			
1322	1334	1672	4328	661	669	647	1978	46%	Buffer

Source: HDT 2019 Measurement

No. of homes required			Total	No. of homes delivered			Total	HDT 2020: Measurement	HDT 2020: Consequence
2017-18	2018-19	2019-20		2017-18	2018-19	2019-20			
1334	1672	1550	4556	669	647	1181	2498	55%	Presumption

Source HDT 2020 Measurement

No. of homes required			Total	No. of homes delivered			Total	HDT 2021: Measurement	HDT 2021: Consequence
2018-19	2019-20	2020-21		2018-19	2019-20	2020-21			
1672	1550	1111	4332	647	1181	1067	2895	67%	Presumption

Source: HDT 2021 Measurement

The Council's current stated position on housing supply (that being as of March 2022) is presently only sufficient to demonstrate a supply of 6,830 against a requirement of 10,050 (this including the 20% buffer), thereby amounting to 3.4 years supply (a shortfall of some 3,220 dwellings).

Potential land supply for development

At paragraph 5.12 the consultation states that “*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.*” The buffer applied is approximately 2.3% for the overall supply, which is considered inadequate when considered in light of the Council’s historic under provision of housing against numbers. A 5% lapse rate is typically supported for housing supply assessments which would otherwise seek to add a further 1,417 homes to make the overall provision more like 29,756.

It is important to recognise local concerns about the scale of projected growth negatively impacting on local infrastructure and services, and this needs to be fully reflected in how the Council approaches the development strategy and individual development proposals. The purpose of the Sustainability Appraisal that supports the Local Plan process is clear; plans should come forward comprehensively, knitting together residential, business, leisure and retail growth with appropriate infrastructure. The development strategy needs to be robustly defined to ensure opportunities look to develop for the long term sustainability of the area, and not for short term gains alone.

Urban Regeneration

The sites listed under this section have the ability to deliver up to 11,151 new homes. This approach adopts the brownfield first approach of developing vacant or under-utilised brownfield land in accordance with the NPPF. Paragraph 5.19 makes reference to the use of town centre masterplans and development briefs to bring forward many of the sites. There is also reference to the wider Chatham Design Code that will seek to establish principles for regeneration of sites across Chatham.

What cannot be ignored is that under this heading it acknowledges that redevelopment is proposed at both Chatham Docks and Medway City Estate, currently large areas that provide employment opportunities for Medway. Whilst redevelopment of these areas could secure new housing provision this would be at the expense of existing employment provision. This is noted at paragraph 5.28 of the consultation where it states that redevelopment of these areas “*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.*” This is further reinforced a paragraph 5.56 where it states that “*The Medway Employment Land Assessment, 2020 indicated 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.*”

This is of concern when considering the opportunity for new employment provision as set out on Map 5 given that all sites are north of the River with minimal opportunities identified within the main built up areas and surroundings.

Suburban Expansion

This source of capacity has been identified as being able to provide up to 9,680 new homes to meet the future needs of Medway and are solely based in the south east part of Medway around Rainham and Hempstead/Chatham.

Much of the land is promoted within the Capstone Valley area that provides the Green Lung between Chatham and Hempstead and is a valuable landscape area. Furthermore, this area is contiguous with the proposed Lidsing Garden Village promoted for development through the Maidstone Local Plan that would see a continuous ribbon of development that would seek to deliver approximately 4,000 homes by the same land promoter across both Medway and Maidstone. This area benefits from the worst road connectivity to the national highway network with limited ability to secure improvements without likely requiring third party land and significant landscape impacts that would need to be mitigated for.

Within the areas north of Rainham it is noted that part of the areas considered relate to the land off Pump Lane (MC/19/1566) that was refused by the Council on the basis of:

1. Ecology impacts;
2. Heritage impacts;
3. Landscape impacts;
4. Highway impacts; and
5. Loss of BMV.

That refusal was subsequently upheld on appeal with the Inspector agreeing that development of the site would result in substantial adverse landscape impacts and harm to character and appearance of the countryside generally. Furthermore, it was determined that the scheme would “*result in a severe cumulative impact on traffic levels at key junctions in the local area and on the free flow of traffic on the local highway network*” (paragraph 12.236 of the appeal decision). The ecology, heritage and BMV grounds were not sufficient to warrant refusal however in the overall balance. Nevertheless, the acknowledged substantial adverse landscape impacts and severe highways impacts should mean that this site is unsuitable for consideration as part of the emerging plan as to do so would require significant highway improvements over and above those proposed at the time of the application/appeal and also having regard to other cumulative developments.

In contrast, my clients’ site on Market Hall has always been considered by the Council as a potential development site.

Rural Development

This source of capacity clearly provides the greatest opportunity in numerical terms (the consultation noting capacity for up to 14,736 homes). It is hardly surprising that the opportunity areas are almost exclusively focussed on the Peninsula given the long running aspiration of the council to meet a significant amount of future needs here.

As the consultation notes, the potential for development here has been set out in the previous draft Hoo Development Framework consulted on in 2022. That framework recognised the key constraints for development at the scale proposed, noting the first constraint in the document as being “*Significant issues with traffic and air quality, particularly around Four Elms Roundabout.*” The Council had previously secured money through the HIF funding programme to deliver many of the required infrastructure improvements that would have been required to support the extensive development. However, that funding has now been withdrawn and with it the opportunity to deliver the significant investments required to support such extensive development as previously proposed. The opportunity to therefore deliver the scale of development originally intended must be curtailed such that the role of rural development to meet the overwhelming housing need is likely to be reduced in scale considerably.

Green Belt Release

This source of capacity provides the smallest opportunity for development with provision only for up to 2,469 homes.

Paragraph 140 of the Framework states that local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered where exceptional circumstances “*are fully evidenced and justified*”, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Paragraph 141 then goes on to state that “*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.*”

Whilst there is no formal definition or criteria to demonstrate exceptional circumstances, there has been an increasing amount of case law as local planning authorities have begun to alter the boundaries of their Green Belt through their Local Plans. These cases have come under increasing scrutiny. One of the most established cases was ***Gallagher Homes Limited v Solihull Metropolitan Borough Council*** (2014). The following points were made clear by this decision are:

- Planning guidance is a material consideration for plan-making and decision taking. However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies;

- The test for redefining a Green Belt boundary has not been changed by the Framework. It is not arguable that the mere fact that a local authority is drawing up its local plan is itself an exceptional circumstance justifying a boundary change. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans and has always required exceptional circumstances to do this;
- A local planning authority must find that exceptional circumstances exist before they make any alteration in a Green Belt boundary, whether it is considering extending or diminishing the Green Belt; and
- Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgement, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if they fail to adopt a lawful approach to exceptional circumstances. Once Green Belt has been established and approved, it requires more than general planning concepts to justify alterations.

Of course, more recently has been the case of Guildford Borough Council and its local plan of 2019 and the subsequent Judicial Review (2019). This was principally a case brought about by Compton Parish Council, Julian Cranwell and Ockham Parish Council against the release of land from the Green Belt as part of the new local plan. In the judgement the key issue was outlined at paragraph 7 as: *“The main general issue (numbered 2 in the list used by the parties) was whether the Inspector had erred in law in his approach to what constituted the “exceptional circumstances” required for the redrawing of Green Belt boundaries on a local plan review. This had a number of aspects, including whether he had treated the normal as exceptional, and had failed to consider rationally, or with adequate reasons, why Green Belt boundaries should be redrawn so as to allow for some 4000 more houses to be built than Guildford BC objectively needed. The scale of the buffer did not result, it was said, from any consideration of why a buffer of such a scale was required but was simply the sum of the site capacities of the previously allocated sites. There were two other general issues (1) and (7): (1) had the Inspector considered lawfully or provided adequate reasoning for not reducing the housing requirement, leaving some needs unmet to reflect the Green Belt policy constraints faced by Guildford BC? (7) Did Guildford BC breach the Environmental Assessment of Plans and Programmes Regulations 2004 SI No.1633, in deciding not to reconsider what might be reasonable alternatives to the proposed Plan when, in 2018, the objectively assessed housing needs figure was reduced from 12,426 to 10,678, with housing land supply allocations totalling 14,602. It was submitted that it ought to have considered alternatives such as removing the development allocation in the Green Belt from one or more of the contentious large sites.”*

The judgement set out clearly at paragraph 68 that *“There is no definition of the policy concept of “exceptional circumstances”. This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case; Calverton Parish Council v Nottingham City Council [2015] EWHC 1078 at [20], Jay J. It is deliberately broad, and not susceptible to dictionary definition.”*

The judgement continued noting at paragraph 69 that *“The parties agreed that whether a particular factor was capable of being an “exceptional circumstance” in any particular case was a matter of law; but whether in any particular case it was treated as such, was a matter of planning judgment. That does not take one very far, in my judgment, because a judicial decision that a factor relied on by a planning decision-maker as an “exceptional circumstance” was not in law capable of being one is likely to require some caution and judicial restraint. All that is required is that the circumstances relied on, taken together, rationally fit within the scope of “exceptional circumstances” in this context. The breadth of the phrase and the array of circumstances which may come within it place the judicial emphasis very much more on the rationality of the judgment than on providing a definition or criteria or characteristics for that which the policy-maker has left in deliberately broad terms.”*

In considering the relevant strength of the exceptional circumstances test paragraph 70 notes that:

“Exceptional circumstances” is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires “very special circumstances.” That difference is clear enough from the language itself and the different contexts in which they appear, but if authority were necessary, it can be found in R(Luton BC) v Central Bedfordshire Council [2015] EWCA Civ 537 at [56], Sales LJ. As Patterson J pointed out in IM Properties Development Ltd v Lichfield DC

[2014] EWHC 2240 at [90-91 and 95-96], there is no requirement that Green Belt land be released as a last resort, nor was it necessary to show that assumptions upon which the Green Belt boundary had been drawn, had been falsified by subsequent events.”

The judgement then continued to discuss what could be defined as ‘exceptional circumstances’ in the following paragraphs:

“71. There is however a danger of the simple question of whether there are “exceptional circumstances” being judicially over-analysed. This phrase does not require at least more than one individual “exceptional circumstance”. The “exceptional circumstances” can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.

72. General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that “exceptional circumstances” exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need. I accept that it is clearly implicit in the stage 2 process that restraint may mean that the OAN is not met. But that is not the same as saying that the unmet need is irrelevant to the existence of “exceptional circumstances”, or that it cannot weigh heavily or decisively; it is simply not necessarily sufficient of itself. These factors do not exist in a vacuum or by themselves: there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy. The analysis in Calverton PC of how the issue should be approached was described by Jay J as perhaps a counsel of perfection; but it is not exhaustive or a checklist. The points may not all matter in any particular case, and others may be important especially the overall distribution of development, and the scope for other uses to be provided for along with sustainable infrastructure.

73. Mr Kimblin put forward Mr Cranwell’s contention that the supply of land for ordinary housing, even with the combination of circumstances found here to constitute exceptional circumstances by the Inspector, could not in law amount to “exceptional circumstances.” I cannot accept that, and I regard it as obviously wrong. These judgments were very much on the planning judgment side of the line; I do not see how they could be excluded from the scope of that phrase as a matter of law. This contention involves a considerably erroneous appreciation of the whole concept of “exceptional circumstances” and the role of the Inspector’s planning judgment. Mr Kimblin accepted in oral argument that he might be putting it too high, but he said there still had to be something exceptional about the need.

74. It is of a piece with Mr Cranwell’s further contention that the Inspector had ducked the issue of why the circumstances he found to be “exceptional” were “exceptional”. The phrase “exceptional circumstances” should be considered as a whole, and in its context, which is to judge whether Green Belt boundaries should be altered in a Local Plan review. It is not necessary to explain why each factor or the combination is itself “exceptional”. It does not mean that they have to be unlikely to recur in a similar fashion elsewhere. It is sufficient reasoning to spell out what those factors are, and to reach the judgment. There is a limit to the extent to which such a judgment can or should be elaborated.”

In addition, when considering whether to amend the boundary of Green Belt, the starting point for a local authority is that this decision should only arise after all reasonable and acceptable efforts have been taken to maximise the amount of development within the urban area. Optimising densities and ensuring that all land is appropriately used must be the first response to growth. This would include a review of employment land and other areas or uses that are protected by planning policies, commensurate with ensuring the proper balance between residential, employment and other uses.

Case law also has established that general planning merits cannot be exceptional circumstances; for example, it is not sufficient that the local authority consider that the relevant land would, or would not be, a sustainable location for development, or that they would have drawn the boundary line in a different place had they been starting from scratch. In other words, something must have occurred subsequent to the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that

cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change.

Should a local authority decide that exceptional circumstances do necessitate a revision to Green Belt boundaries, they cannot revise the boundaries further than is necessary to meet those exceptional circumstances. For example, if exceptional circumstances have been demonstrated to necessitate the building of, for example, 50 additional homes per year on Green Belt land, they cannot then release land to allow for the building of 100 homes per year. In addition, a local authority will need to ensure that the exceptional circumstances justifying the release of Green Belt land are carried through to fruition when allocating sites for development/granting planning permission. For example, providing sufficient affordable housing provision on-site if a significant need for affordable housing has been successfully demonstrated to justify the release of land designated as Green Belt.

If challenged, the Court can declare the adoption of a plan unlawful and quash it (or parts of it) if the plan-maker has failed to take a lawful approach to exceptional circumstances. This means that it is not enough for a local authority or inspector to assert that exceptional circumstances exist; it is not possible to convert unexceptional circumstances into exceptional circumstances simply by labelling them as such.

At this stage it is not therefore considered that the council have demonstrated any exceptional circumstances to warrant a review of the green belt boundaries to facilitate future development. Accordingly, the potential capacity of 2,469 homes should be deleted from future consideration until such times as all other potential sources to meet the future needs are discounted.

Other comments

It is notable that this current Regulation 18 lacks the detail on any emerging policy framework that was evident in the previous Regulation 18 consultation that took place in 2018. That consultation included specific details on emerging policies to be considered alongside the spatial strategy options. It is therefore unclear when that consultation will take place given that the LDS timetable only allows for a single further stage with the publication of the draft plan in early 2024.

The purpose of the Regulation 18 consultation is to engage with local residents and relevant organisations to identify how planning policies can be used positively to help address key issues within the local authority area. The consultation should take any issues that have been highlighted and then identify the preferred approach for addressing these through planning policy. The purpose of the public consultation is therefore to allow interested parties an opportunity to indicate if, on balance, they feel that the Local Plan takes the right approach to dealing with these issues or, if not, to highlight an alternative approach.

At present the opportunity for interested parties to comment on specific policies and whether or not the plan as a whole is appropriate is therefore significantly reduced to the Regulation 19 stage. It is therefore unclear whether previous detailed comments made on emerging policies from the previous Regulation 18 consultation in 2018 will be factored into the emerging policies that will be included as part of the subsequent Regulation 19 consultation and clarity on this is therefore sought.

Yours sincerely



ASSOCIATE DIRECTOR BA (Hons) DipTP MRTPI AssocRICS
For and On Behalf Of
TETLOW KING PLANNING

From: [REDACTED]
Sent: 31 October 2023 22:42
To: uturemedway@medway.gov.uk; futuremedway
Subject: 2040 Medway Local Plan Public Comment.

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

J Brewood 2040 Medway Local Plan comment Oct 31, 2023.

I am unable to submit my comments on the 2040 Medway Local Plan. There appears to be a computer glitch in the system that is preventing the use of this online facility.

It will be appreciated if your department will ensure my submission is registered and made public before the deadline of 11:59pm Oct 31 expires.

The 2040 Local Plan should not contain any safeguarding policy for Rochester Airport.

Aviation Policy.

I am opposed to any safeguarding of Rochester Airport as proposed.

This is not a saved policy or included in the expired 2003 Medway Plan. The council has no public support or a mandate for imposing any safeguarding of aviation on the community.

To impose such a policy would be grossly unfair undemocratic and not in the best public interest. Or that of the environment and possibly unlawful.

we hoped the change of leadership would put an end to autocracy and this new administration will at last listen. To what the people want and realise what the community and Medway need.

Public consultation confirmed residents do not want any expansion of aviation or the hazard of an unfettered airport.

The 2003 Medway Local Plan expired has no safeguarding policy. Imposing this liability on the ratepayer without proper consultation and education will not help struggling families.

In particular during this cost-of-living crisis, as this new Labour administration has pledged to do.

Aviation is in the low employment sector and unlikely to create more than a handful of new jobs. This mode of transport generates carbon dioxide and many other toxic waste effects and disturbances.

The airport operator is a private company. It is for them to ensure their business remains viable. Why should ratepayers subsidise any company unable to manage this.

Carbon dioxide dispositions and GHGs adversely impact to climate change. These adverse effects impact to government's carbon carbon-reducing policy.

To the quality-of-life amenity and the purposes of the North Kent Downs designation and AONB.

Aviation overburdening causes stress and heart-related illness. These effects do not promote well-being or a heavier environment in which to live and work in.

The distraction of aviation following the airport reconfiguration will impact to the learning environment of children. When attending one of the 17 schools surrounding the airport hazard.

In combination with road traffic aviation is the main cause of poor air quality.

Restricting the land use exclusively to aviation without any consideration of alternative greener, safer and community uses. Potentially is detrimental to ratepayers.

Who are unaware they are already subsidising the operation of the airport. The council has a fiscal duty to get the best financial return to council coffers. Currently, the council is failing in this responsibility.

In the event the airport operator declares bankruptcy the costs and all liability of running costs or claims for any reason will fall on the ratepayer.

Safeguarding devalues the community of a valuable freehold asset and commits the unwitting ratepayer long-term to an activity that serves no real community benefit.

The police surveying aircraft and the air ambulance services can operate from this facility without the need to safeguard aviation.

The council has not identified the need for safeguarding aviation. The airport is a wide open tract of green space that should be protected and utilised for the benefit of the whole community.

Not just 80 or so people who fly for a hobby not living locally.

Should the council decide to implement a safeguarding policy. The airport should no longer remain unfettered. The recent infrastructure alterations the council predicts may cause a fall in flight numbers.

Therefore there is no reason not to restrict air movements and to cap these. Based on the average number of recorded flights over the past two full years.

The council for far too long has completely ignored the impact of an unfettered airport since 1933. It is time for this local authority as the competent council to correct this unacceptable situation.

Thank you for your assistance.

Jim Brewood.

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 safeguarding 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 safeguarding 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 councillor 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.

James



Medway Council
Planning Policy Team

Date: 31 October 2023

Our Ref: M16/0903.08

Your Ref:

By email only: futuremedway@medway.gov.uk

Dear Sir/Madam

**RE: MEDWAY COUNCIL LOCAL PLAN 2022-2040
REGULATION 18 CONSULTATION**

I am writing on behalf of my clients, Nightingales Homes Ltd, who are the promoters of land to the east of Yokosuka Way for a residential led development.

Site and Proposed Development

The site comprises a total of 16hectares (39.5acres) of land, located to the east of Gillingham town centre and to the north of Twydall.

The site can be accessed via a gated track on Grange Road or via the exiting Lower Featherby Road, which is also gated at the top close to the crossroad with Grange Road. There are no public rights of way across the site, or any permissive rights of way affording public access.

The northern boundary of the site is defined by Grange Road, with the eastern boundary defined by Eastcourt Lane. The south western boundary is edged by the Yokosuka Way carriageway, with the north western boundary edged by Lower Featherby Road connecting with Grange Road and further north to Lower Rainham Road.

The present land designation in the adopted local plan indicates that the entire site is washed over by the Area of Local Landscape Importance. Lower Featherby Road is designated as a rural lane, whilst the Riverside country park further to the north east is protected by virtue of policy L9.

This site was recently put forward in the Call for Sites process, which has been the situation since at least 2010 as per the history below:

- 2010 – excluded on the basis of policy grounds and being a Greenfield site.
- 2015 – the site scored poorly on landscape grounds, being identified as best and most versatile agricultural land, being generally unsuitable for residential or economic development.
- 2017 – excluded purely on suitability grounds.
- 2018 - excluded purely on suitability grounds with commentary relating to agriculture, landscape and unsuitable location.
- 2019 - excluded purely on suitability grounds.

We are in the process of working up a planning application for this site to deliver in the region of 500 dwellings (including policy compliant affordable housing as well specialist accommodation for older people) as well as significant areas of open space and on-site local facilities/services where required. This will secure a mixed-use development with benefits extending beyond the proposed residential area to the neighbouring wards, utilising and enhancing the existing local infrastructure for a sustainable development with the potential to deliver significant employment growth.

National Planning Policy Context

The NPPF sets out at its core the description of sustainable development. This encompasses economic, social and environmental ‘pillars’, emphasising the need to ensure sufficient land of the right *types* is available to support growth, innovation and improved productivity. Paragraph 11a) sets out that all plans should “*promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.*”

The Planning Practice Guidance (hereafter PPG) indicates that constraints should not be applied to the overall assessment of development needs, as limitations such as housing market capacity, Green Belt or environmental designations are not relevant to assessing the scale of need, but “*considerations when assessing how to meet need*”. It is relevant to note that while Medway has only approximately 5% of its land designated as Green Belt (see paragraph 5.49) which seeks to restrict development, this is not unusual within the South East. Indeed, Medway is significantly less constrained than a number of its neighbouring Kent authorities, many of which have a much higher coverage of Green Belt – for example 77% of Gravesham and 71% of Tonbridge and Malling is covered by the Green Belt designation.

The PPG provides clarity on how local plans are to be produced stating that “*Authorities preparing local plans should assess future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach (except where this has already been dealt with through a spatial development strategy). This involves gathering evidence, carrying out a Sustainability Appraisal to inform the preparation of local plans and effective engagement and consultation with local communities, businesses and other interested parties.*” (Paragraph: 034 Reference ID: 61-034-20190315)

The purpose of the statutory Sustainability Appraisal process is to “*to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.*” (Paragraph: 001 Reference ID: 11-001- 20190722). This is intended to be an iterative process, undertaken so that the evidence underpinning the plan is tested transparently, with full recognition of potential environmental, social and economic effects.

The PPG then goes on to note that “*Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a plan must do so with the objective of contributing to the achievement of sustainable development.*” (Paragraph: 001 Reference ID: 11-001- 20190722).

The preparation of an SA is intended to be an integral part of the preparation of the Local Plan, informing the generation and testing of options. In accordance with the flowchart referenced at Paragraph: 013 Reference ID: 11-013-20140306 the Council ought to be at Stage B of the SA process now, which is “*Developing and refining alternatives and assessing effects.*”

Vision for Medway in 2040

The NPPF requires Councils to plan positively to seek opportunities to meet the development needs of the area and as a minimum to provide for objectively assessed needs for housing. This means planning over the long term to meet the needs not only of today’s population, but the projected growth of an area and the needs expected to arise over the Strategic Plan period and beyond.

The NPPF sets out clearly at paragraph 22 that “*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.*” A vision to 2040 would therefore require the plan to be adopted by 2025 to comply with the minimum 15 year period, which may be tight despite the published timetable in the October 2022 LDS that envisaged adoption by Autumn 2023.

Strategic objectives

We support the overall objectives set out in the consultation to ensure that the new local plan will be able to transform Medway over the plan period and tackle all of the key issues. It is vital that alongside housing development the plan also delivers employment generation as well as the necessary infrastructure, whilst securing protection and enhancement of the landscape and environment.

The Local Housing Needs Assessment (2021) provides the summary of housing need across all sectors with key headlines being:

- Annual need for 870 affordable homes per year (or 55% of overall housing need);
- Need for greater supply of specialist housing for older people;
- 5% of all new dwellings per year to be M4(3) wheelchair accessible

Developing a Spatial Strategy

The Council acknowledge the challenges that it faces to deliver the Housing need over the plan period stating under 5.3 that the “*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 strategy goes on to set out that the Council are looking at alternative growth scenarios which show lower population growth, albeit recognising the current housing crisis.

Whilst raising concern with the standard method it is of course to be noted that the policies in the local plan are more than 5 years old and as such, in accordance with paragraph 74 of the NPPF, local housing need is to be derived from the standard method and not the local plan. Additional guidance is provided in chapter 68 of the Planning Practice Guidance (PPG): “Housing supply and delivery”. Paragraph 68-001 of the PPG states: “*The standard method for calculating local housing need provides a minimum number of homes to be planned for. Authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach. The Housing Delivery Test measures whether planned requirements (or, in some cases, local housing need) have been met over the last 3 years. The 5 year housing land supply is a calculation of whether there is a deliverable supply of homes to meet the planned housing requirement (or, in some circumstances, local housing need) over the next 5 years.*”

The Housing & Demographics (April 2021) document provides clear evidence of housing completions in Medway between 2001/02 and 2019/20 as shown in the extract below:

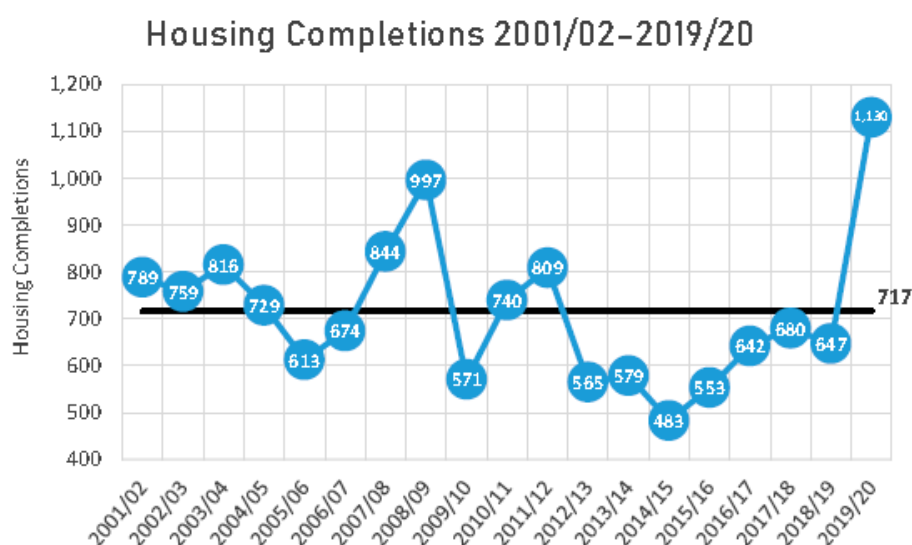


Figure 9: Housing Completions, 2001/02-2019/20 (Source: Medway AMRs³ & MHCLG⁴)

This is a clear picture of the challenge ahead to deliver close to the 1,667 dwellings per annum required.

It is also relevant however to assess the Council's historic performance on housing delivery to provide a clearer picture on the challenge.

No. of homes required			Total	No. of homes delivered			Total	HDT 2018: Measurement	HDT 2018: Consequence
2015-16	2016-17	2017-18		2015-16	2016-17	2017-18			
1341	1322	1334	3997	553	661	669	1883	47%	Buffer

Source HDT 2018 Measurement

No. of homes required			Total	No. of homes delivered			Total	HDT 2019: Measurement	HDT 2019: Consequence
2016-17	2017-18	2018-19		2016-17	2017-18	2018-19			
1322	1334	1672	4328	661	669	647	1978	46%	Buffer

Source: HDT 2019 Measurement

No. of homes required			Total	No. of homes delivered			Total	HDT 2020: Measurement	HDT 2020: Consequence
2017-18	2018-19	2019-20		2017-18	2018-19	2019-20			
1334	1672	1550	4556	669	647	1181	2498	55%	Presumption

Source HDT 2020 Measurement

No. of homes required			Total	No. of homes delivered			Total	HDT 2021: Measurement	HDT 2021: Consequence
2018-19	2019-20	2020-21		2018-19	2019-20	2020-21			
1672	1550	1111	4332	647	1181	1067	2895	67%	Presumption

Source: HDT 2021 Measurement

The Council's current stated position on housing supply (that being as of March 2022) is presently only sufficient to demonstrate a supply of 6,830 against a requirement of 10,050 (this including the 20% buffer), thereby amounting to 3.4 years supply (a shortfall of some 3,220 dwellings).

Potential land supply for development

At paragraph 5.12 the consultation states that “*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.*” The buffer applied is approximately 2.3% for the overall supply, which is considered inadequate when considered in light of the Council's historic under provision of housing against numbers. A 5% lapse rate is typically supported for housing supply assessments which would otherwise seek to add a further 1,417 homes to make the overall provision more like 29,756.

It is important to recognise local concerns about the scale of projected growth negatively impacting on local infrastructure and services, and this needs to be fully reflected in how the Council approaches the development strategy and individual development proposals. The purpose of the Sustainability Appraisal that supports the Local Plan process is clear; plans should come forward comprehensively, knitting together residential, business, leisure and retail growth with appropriate infrastructure. The development strategy needs to be robustly defined to ensure opportunities look to develop for the long term sustainability of the area, and not for short term gains alone.

Urban Regeneration

The sites listed under this section have the ability to deliver up to 11,151 new homes. This approach adopts the brownfield first approach of developing vacant or under-utilised brownfield land in accordance with the NPPF. Paragraph 5.19 makes reference to the use of town centre masterplans and development briefs to bring forward many of the sites. There is also reference to the wider Chatham Design Code that will seek to establish principles for regeneration of sites across Chatham.

What cannot be ignored is that under this heading it acknowledges that redevelopment is proposed at both Chatham Docks and Medway City Estate, currently large areas that provide employment opportunities for Medway. Whilst redevelopment of these areas could secure new housing provision this would be at the expense of existing employment provision. This is noted at paragraph 5.28 of the

consultation where it states that redevelopment of these areas “*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.*” This is further reinforced a paragraph 5.56 where it states that “*The Medway Employment Land Assessment, 2020 indicated 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.*”

This is of concern when considering the opportunity for new employment provision as set out on Map 5 given that all sites are north of the River with minimal opportunities identified within the main built up areas and surroundings.

Suburban Expansion

This source of capacity has been identified as being able to provide up to 9,680 new homes to meet the future needs of Medway and are solely based in the south east part of Medway around Rainham and Hempstead/Chatham.

Much of the land is promoted within the Capstone Valley area that provides the Green Lung between Chatham and Hempstead and is a valuable landscape area. Furthermore, this area is contiguous with the proposed Lidsing Garden Village promoted for development through the Maidstone Local Plan that would see a continuous ribbon of development that would seek to deliver approximately 4,000 homes by the same land promoter across both Medway and Maidstone. This area benefits from the worst road connectivity to the national highway network with limited ability to secure improvements without likely requiring third party land and significant landscape impacts that would need to be mitigated for.

Within the areas north of Rainham it is noted that part of the areas considered relate to the land off Pump Lane (MC/19/1566) that was refused by the Council on the basis of:

- 1) Ecology impacts;
- 2) Heritage impacts;
- 3) Landscape impacts;
- 4) Highway impacts; and
- 5) Loss of BMV.

That refusal was subsequently upheld on appeal with the Inspector agreeing that development of the site would result in substantial adverse landscape impacts and harm to character and appearance of the countryside generally. Furthermore, it was determined that the scheme would “*result in a severe cumulative impact on traffic levels at key junctions in the local area and on the free flow of traffic on the local highway network*” (paragraph 12.236 of the appeal decision). The ecology, heritage and BMV grounds were not sufficient to warrant refusal however in the overall balance. Nevertheless, the acknowledged substantial adverse landscape impacts and severe highways impacts should mean that this site is unsuitable for consideration as part of the emerging plan as to do so would require significant highway improvements over and above those proposed at the time of the application/appeal and also having regard to other cumulative developments.

In contrast, my clients’ site on land east of Yokosuka Way has previously been considered by the Council as a potential development site when previously promoted for mixed-use development to provide for a potential new football stadium. When the previous local plan was consulted on in 2018 (that being the MEDWAY COUNCIL LOCAL PLAN 2012-2035 DEVELOPMENT STRATEGY REGULATION 18 CONSULTATION REPORT) the site had been excluded from consideration on the basis of potential effects on a locally valued landscape and impacts on the loss of BMV. However, it has subsequently been the case that the council have supported the development of other sites constrained in the same manner when deeming the wider benefits to outweigh the harms. Furthermore, although there are no detailed policies outlined in this current consultation, the previous emerging Local Plan that was published but withdrawn prior to consultation proposed the deletion of the current ALLI approach under policy BNE35 thereby downgrading the landscape of the site to being countryside but not a locally valued landscape. This therefore represents a significant change to the constraints for the site moving forward.

We consider that the effects of development at Riverview Park on the immediate and surrounding landscapes can be successfully managed and the site’s development deliver an attractive new neighbourhood. Detailed studies by a number of specialist consultants, including a landscape architect,

will be provided as part of a future application to demonstrate this. The allocation of the site will enable the Council to protect other sites across Medway which are expected to impact more negatively on the area's environmental and heritage assets. This site provides a logical extension to the town, and its allocation will ensure that the Council can safeguard more countryside locations on the outskirts of Gillingham. As recognised in the Plan, a quality environment can help boost the economy; in tandem with regenerating those areas across Medway where redevelopment can encourage fresh investment, the delivery of new, high quality employment space at Riverview Park will deliver a cohesive, landscaped scheme to attract businesses to Gillingham. Moreover, as part of the emerging application work, we have been engaged in discussions with the highways team who have stated that with the proposed junction arrangements as part of the scheme there would not be significant adverse impacts on the existing highway network that would of themselves represent a reason to make the site unacceptable. This is a significant difference to the impacts of the Pump Lane land being identified given the outcome of the recent appeal.

Rural Development

This source of capacity clearly provides the greatest opportunity in numerical terms (the consultation noting capacity for up to 14,736 homes). It is hardly surprising that the opportunity areas are almost exclusively focussed on the Peninsula given the long running aspiration of the council to meet a significant amount of future needs here.

As the consultation notes, the potential for development here has been set out in the previous draft Hoo Development Framework consulted on in 2022. That framework recognised the key constraints for development at the scale proposed, noting the first constraint in the document as being “*Significant issues with traffic and air quality, particularly around Four Elms Roundabout.*” The Council had previously secured money through the HIF funding programme to deliver many of the required infrastructure improvements that would have been required to support the extensive development. However, that funding has now been withdrawn and with it the opportunity to deliver the significant investments required to support such extensive development as previously proposed. The opportunity to therefore deliver the scale of development originally intended must be curtailed such that the role of rural development to meet the overwhelming housing need is likely to be reduced in scale considerably.

Green Belt Release

This source of capacity provides the smallest opportunity for development with provision only for up to 2,469 homes.

Paragraph 140 of the Framework states that local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered where exceptional circumstances “*are fully evidenced and justified*”, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Paragraph 141 then goes on to state that “*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.*”

Whilst there is no formal definition or criteria to demonstrate exceptional circumstances, there has been an increasing amount of case law as local planning authorities have begun to alter the boundaries of their Green Belt through their Local Plans. These cases have come under increasing scrutiny. One of the most established cases was **Gallagher Homes Limited v Solihull Metropolitan Borough Council** (2014). The following points were made clear by this decision are:

- Planning guidance is a material consideration for plan-making and decision taking. However, it does not have statutory force: the only statutory obligation is to have regard to relevant policies;
- The test for redefining a Green Belt boundary has not been changed by the Framework. It is not arguable that the mere fact that a local authority is drawing up its local plan is itself an exceptional circumstance justifying a boundary change. National guidance has always dealt with revisions of

the Green Belt in the context of reviews of local plans and has always required exceptional circumstances to do this;

- A local planning authority must find that exceptional circumstances exist before they make any alteration in a Green Belt boundary, whether it is considering extending or diminishing the Green Belt; and
- Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgement, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if they fail to adopt a lawful approach to exceptional circumstances. Once Green Belt has been established and approved, it requires more than general planning concepts to justify alterations.

Of course, more recently has been the case of Guildford Borough Council and its local plan of 2019 and the subsequent Judicial Review (2019). This was principally a case brought about by Compton Parish Council, Julian Cranwell and Ockham Parish Council against the release of land from the Green Belt as part of the new local plan. In the judgement the key issue was outlined at paragraph 7 as: *“The main general issue (numbered 2 in the list used by the parties) was whether the Inspector had erred in law in his approach to what constituted the “exceptional circumstances” required for the redrawing of Green Belt boundaries on a local plan review. This had a number of aspects, including whether he had treated the normal as exceptional, and had failed to consider rationally, or with adequate reasons, why Green Belt boundaries should be redrawn so as to allow for some 4000 more houses to be built than Guildford BC objectively needed. The scale of the buffer did not result, it was said, from any consideration of why a buffer of such a scale was required but was simply the sum of the site capacities of the previously allocated sites. There were two other general issues (1) and (7): (1) had the Inspector considered lawfully or provided adequate reasoning for not reducing the housing requirement, leaving some needs unmet to reflect the Green Belt policy constraints faced by Guildford BC? (7) Did Guildford BC breach the Environmental Assessment of Plans and Programmes Regulations 2004 SI No.1633, in deciding not to reconsider what might be reasonable alternatives to the proposed Plan when, in 2018, the objectively assessed housing needs figure was reduced from 12,426 to 10,678, with housing land supply allocations totalling 14,602. It was submitted that it ought to have considered alternatives such as removing the development allocation in the Green Belt from one or more of the contentious large sites.”*

The judgement set out clearly at paragraph 68 that *“There is no definition of the policy concept of “exceptional circumstances”. This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case; Calverton Parish Council v Nottingham City Council [2015] EWHC 1078 at [20], Jay J. It is deliberately broad, and not susceptible to dictionary definition.”*

The judgement continued noting at paragraph 69 that *“The parties agreed that whether a particular factor was capable of being an “exceptional circumstance” in any particular case was a matter of law; but whether in any particular case it was treated as such, was a matter of planning judgment. That does not take one very far, in my judgment, because a judicial decision that a factor relied on by a planning decision-maker as an “exceptional circumstance” was not in law capable of being one is likely to require some caution and judicial restraint. All that is required is that the circumstances relied on, taken together, rationally fit within the scope of “exceptional circumstances” in this context. The breadth of the phrase and the array of circumstances which may come within it place the judicial emphasis very much more on the rationality of the judgment than on providing a definition or criteria or characteristics for that which the policy-maker has left in deliberately broad terms.”*

In considering the relevant strength of the exceptional circumstances test paragraph 70 notes that:

“Exceptional circumstances” is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires “very special circumstances.” That difference is clear enough from the language itself and the different contexts in which they appear, but if authority were necessary, it can be found in R(Luton BC) v Central Bedfordshire Council [2015] EWCA Civ 537 at [56], Sales LJ. As Patterson J pointed out in IM Properties Development Ltd v Lichfield DC [2014] EWHC 2240 at [90-91 and 95-96], there is no requirement that Green Belt land be released as a last resort, nor was it necessary to show that assumptions upon which the Green Belt boundary had been drawn, had been falsified by subsequent events.”

The judgement then continued to discuss what could be defined as 'exceptional circumstances' in the following paragraphs:

"71. There is however a danger of the simple question of whether there are "exceptional circumstances" being judicially over-analysed. This phrase does not require at least more than one individual "exceptional circumstance". The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.

72. General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that "exceptional circumstances" exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need. I accept that it is clearly implicit in the stage 2 process that restraint may mean that the OAN is not met. But that is not the same as saying that the unmet need is irrelevant to the existence of "exceptional circumstances", or that it cannot weigh heavily or decisively; it is simply not necessarily sufficient of itself. These factors do not exist in a vacuum or by themselves: there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy. The analysis in Calverton PC of how the issue should be approached was described by Jay J as perhaps a counsel of perfection; but it is not exhaustive or a checklist. The points may not all matter in any particular case, and others may be important especially the overall distribution of development, and the scope for other uses to be provided for along with sustainable infrastructure.

73. Mr Kimblin put forward Mr Cranwell's contention that the supply of land for ordinary housing, even with the combination of circumstances found here to constitute exceptional circumstances by the Inspector, could not in law amount to "exceptional circumstances." I cannot accept that, and I regard it as obviously wrong. These judgments were very much on the planning judgment side of the line; I do not see how they could be excluded from the scope of that phrase as a matter of law. This contention involves a considerably erroneous appreciation of the whole concept of "exceptional circumstances" and the role of the Inspector's planning judgment. Mr Kimblin accepted in oral argument that he might be putting it too high, but he said there still had to be something exceptional about the need.

74. It is of a piece with Mr Cranwell's further contention that the Inspector had ducked the issue of why the circumstances he found to be "exceptional" were "exceptional". The phrase "exceptional circumstances" should be considered as a whole, and in its context, which is to judge whether Green Belt boundaries should be altered in a Local Plan review. It is not necessary to explain why each factor or the combination is itself "exceptional". It does not mean that they have to be unlikely to recur in a similar fashion elsewhere. It is sufficient reasoning to spell out what those factors are, and to reach the judgment. There is a limit to the extent to which such a judgment can or should be elaborated."

In addition, when considering whether to amend the boundary of Green Belt, the starting point for a local authority is that this decision should only arise after all reasonable and acceptable efforts have been taken to maximise the amount of development within the urban area. Optimising densities and ensuring that all land is appropriately used must be the first response to growth. This would include a review of employment land and other areas or uses that are protected by planning policies, commensurate with ensuring the proper balance between residential, employment and other uses.

Case law also has established that general planning merits cannot be exceptional circumstances; for example, it is not sufficient that the local authority consider that the relevant land would, or would not be, a sustainable location for development, or that they would have drawn the boundary line in a different place had they been starting from scratch. In other words, something must have occurred subsequent to the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change.

Should a local authority decide that exceptional circumstances do necessitate a revision to Green Belt boundaries, they cannot revise the boundaries further than is necessary to meet those exceptional circumstances. For example, if exceptional circumstances have been demonstrated to necessitate the building of, for example, 50 additional homes per year on Green Belt land, they cannot then release land to allow for the building of 100 homes per year. In addition, a local authority will need to ensure that the exceptional circumstances justifying the release of Green Belt land are carried through to fruition when allocating sites for development/granting planning permission. For example, providing sufficient affordable housing provision on-site if a significant need for affordable housing has been successfully demonstrated to justify the release of land designated as Green Belt.

If challenged, the Court can declare the adoption of a plan unlawful and quash it (or parts of it) if the plan-maker has failed to take a lawful approach to exceptional circumstances. This means that it is not enough for a local authority or inspector to assert that exceptional circumstances exist; it is not possible to convert unexceptional circumstances into exceptional circumstances simply by labelling them as such.

At this stage it is not therefore considered that the council have demonstrated any exceptional circumstances to warrant a review of the green belt boundaries to facilitate future development. Accordingly, the potential capacity of 2,469 homes should be deleted from future consideration until such times as all other potential sources to meet the future needs are discounted.

Other comments

It is notable that this current Regulation 18 lacks the detail on any emerging policy framework that was evident in the previous Regulation 18 consultation that took place in 2018. That consultation included specific details on emerging policies to be considered alongside the spatial strategy options. It is therefore unclear when that consultation will take place given that the LDS timetable only allows for a single further stage with the publication of the draft plan in early 2024.

The purpose of the Regulation 18 consultation is to engage with local residents and relevant organisations to identify how planning policies can be used positively to help address key issues within the local authority area. The consultation should take any issues that have been highlighted and then identify the preferred approach for addressing these through planning policy. The purpose of the public consultation is therefore to allow interested parties an opportunity to indicate if, on balance, they feel that the Local Plan takes the right approach to dealing with these issues or, if not, to highlight an alternative approach.

At present the opportunity for interested parties to comment on specific policies and whether or not the plan as a whole is appropriate is therefore significantly reduced to the Regulation 19 stage. It is therefore unclear whether previous detailed comments made on emerging policies from the previous Regulation 18 consultation in 2018 will be factored into the emerging policies that will be included as part of the subsequent Regulation 19 consultation and clarity on this is therefore sought.

Summary

In conclusion, we broadly support the emerging spatial strategy to meet the future development needs of Medway over the plan period. We do not consider that there exist the exceptional circumstances to warrant release of Green Belt land to meet the development needs given the potential capacity from other sources.

Clearly a balance will need to be struck to realise the full potential of development from urban regeneration given the competing interests for housing and employment and it is important that through future development there remain sufficient opportunities for existing and new employment activities across Medway. Moreover, there needs to be a balanced approach in terms of location for employment uses across the Borough.

In terms of the opportunities provided through Suburban Expansion it will be important to consider the function and purpose of the various sites identified, and importantly consider their relationship to the neighbouring authorities and future development options there. Clearly, the Capstone Valley is under significant threat, increased more due to the proposals for a Garden Village as part of Maidstone

Borough Council's emerging plan despite the clear and obvious impacts for services and facilities within Medway. Given that the Council have objected to these proposals as part of the Examination in Public process and support for the development of neighbouring land within Medway would appear unjustified.

Yours sincerely



IAIN WARNER BSc (Hons) DipTP MRTPI

SENIOR DIRECTOR

For and On Behalf Of

TETLOW KING PLANNING



31 October 2023

By email only

Futuremedway@medway.gov.uk

Dear Sir or Madam,

MEDWAY LOCAL PLAN 2022 – 2040

REGULATION 18 CONSULTATION – SETTING THE DIRECTION FOR MEDWAY 2040

Charterhouse Strategic Land (“**Charterhouse**”) welcomes the opportunity to review and comment on the Setting the Direction for Medway 2040 paper (“the **Paper**”) and trust that the important matters set out herein will be given detailed consideration.

Charterhouse is promoting Land Availability Assessment Site Reference ‘RN4’. We have participated previously in the plan-making process over the last several years and earlier this year submitted the Site as part of the Council’s ‘Call for Sites’.

Comments relating to the proposed ‘Vision for Medway in 2040’

Whilst we agree with the overall thrust of the vision statement as it seeks to describe a position in 2040 where the Council has a good quality of life and is responsive to changing economic, social and environmental conditions, the vision is totally silent on matters relating to housing delivery. When the Council has such a significant housing requirement figure circa 28,500 new homes, Charterhouse considers it imperative that the vision statement recognises the matter. As such, the vision statement should seek to describe the housing position in 2040 that the Council is aiming to achieve. Failure to do so would mean the vision statement is ultimately ineffective.

Comments relating to the proposed ‘Strategic Objectives’

Charterhouse has reviewed the Plan’s proposed Strategic Objectives in Section 4. The Objectives are supported overall, but it is considered that there needs to be a clear and explicit statement as part of the second objective (Supporting people to lead healthy lives and strengthening our communities) that identified future housing requirements will be delivered in full to ensure that there is a choice and mix of housing to meet future needs.

Without such explicit recognition in the objective it is too imprecise and would not ultimately be effective as the basis for a sound planning strategy in our opinion.

Comments relating to ‘Developing a Spatial Strategy’

Charterhouse supports the Council’s recognised position that the Council’s Local Housing Need (“**LHN**”) is 28,500 homes over the identified Plan period. Whilst we appreciate the Council has strong concerns [and has voiced these directly to Central Government] about its scale of its LHN figure it is nonetheless the basis upon which Central Government requires as the starting point for the plan-making process and this has to be embraced. There can be no denial that this Country has a housing

T: 020 7471 6060 F: 020 7471 6040

Charterhouse Strategic Land Ltd
Charter House, 3a Felgate Mews, London, W6 0LY

Company Number: 11086799

VAT Number: 357 912 766

crisis and it requires each and every Local Planning Authority to play its part because a continued failure to consider the future housing needs of the Local Authority area will have severe socio-economic ramifications for years to come, not least decimating the vast supply chains responsible for the planning, design and construction of new homes and letting down a generation of aspiring homeowners¹. This has in part been recognised at paragraph 5.4 which offers some reassurance the Council is aware of some of the consequences for failing to provide new housing opportunities, and we do accept that the Council has its challenges, particularly around highway infrastructure and capacity etc. However, and whilst this may be so, we consider the plan-making process provides the Council with the ability to be proactive in encouraging sustainable patterns of movement through providing development growth options which seek to capitalise on providing opportunities for walking, cycling and integrated public transport use.

The estimate of potential sources of housing land supply provided at paragraph 5.15 the Paper is misleading. 38,200 homes is merely the quantum of development that has been put forward by developers, promoters and landowners and it does not translate into a supply that is 'specific' deliverable or developable sites. We consider it would have been more beneficial to this current consultation if the Council had fully reviewed all the sites submitted and drawn specific conclusions as to the general availability and suitability of potential land supply. In this way, the following section in the Paper could have been more representative as to the Council's potential housing capacity. The potential supply is unrealistic as a consequence and misleading for interested local community stakeholders as it wrongly infers that a significant component of housing land supply [almost one third] can come from 'urban regeneration'.

In our view the correct spatial strategy approach to pursue is a hybrid of the options identified, although we do have concerns with the 'Rural Development' approach, particularly if significant levels of growth are proposed to be delivered via this approach. Such concerns extend to the scale of infrastructure investment necessary to open up the Hoo Peninsula for development, particularly given the Council's failure to secure suitable funding to date. Accordingly, the spatial strategy that gets taken forward will need to be balanced. There will of course be opportunities from urban regeneration but it is clear that this approach in its self will not be sufficient.

The National Planning Policy Framework advocates at paragraph 73 that *"supply of large numbers of new homes can often be best achieved through planning for larger scale development such as significant extensions to existing villages and towns, provided they are well located and designed"*. In this regard we consider that every effort should be made to explore the significant contribution that the 'Suburban Expansion' approach could play in helping to shape the Council's vision statement.

The vision statement makes much of 'green growth' and so the Council should consider and explore the merits of creating a more integrated Medway Urban Area. Such an approach would see the Council having to rely more heavily on 'Suburban Expansion' but in the knowledge that much of this area is not actively farmed² there can be little concern over the loss of land for food source which would not be true if a greater emphasis was once again placed on 'Rural Development' or 'Green Belt loss'.

Conclusions

¹ Housing the Nation report prepared for and published by the Home Builders Federation (September 2023)

² Paragraph 5.31

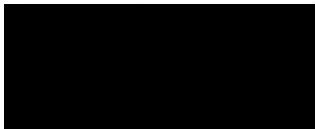


Charterhouse is the promoter behind LAA site reference RN4. We are happy to collaborate with adjoining landowners, developers and promoters to assist in bring forward 'Suburban Expansion'.

The proposed vision statement needs to make a clear statement around meeting the LHN of the local authority area.

It is clear the Council faces a number of challenges and difficulties to meet its LHN figure, but we advocate a hybrid spatial approach to meeting this requirement, and suggest that such approach places a greater reliance on 'Suburban Expansion' as a means to safeguard against the loss of agricultural land in active farming uses and to promote 'green growth' as identified by the proposed vision statement.

Yours faithfully,



Oliver Taylor
Director

T: 020 7471 6060 F: 020 7471 6040

Charterhouse Strategic Land Ltd
Charter House, 3a Felgate Mews, London, W6 0LY

Company Number: 11086799

VAT Number: 357 912 766



Chatham Employment

Medway Local Plan Reg 18

On behalf of

Peel Waters

October 2023

Table of contents

1.	Introduction	1
2.	Context	6
3.	Vision for Medway in 2040	8
4.	Strategic Objectives	10
5.	Developing a Spatial Strategy	13
6.	Conclusion	16

1. Introduction

- 1.1. On behalf of Peel Waters, we are pleased to submit representations to the Regulation 18 consultation to the draft Medway Local Plan.

About Peel Waters

- 1.2. Peel Waters is a UK wide portfolio of vibrant and innovative, waterfront developments. Each site is developed to regenerate its unique waterside setting, ensuring that the area is once again a thriving, community-led, world class destination.
- 1.3. The Peel Waters portfolio started with the design, creation and delivery of MediaCity at Salford Quays. The portfolio now spans over 400 hectares, across six UK-wide sites, delivering large-scale regeneration projects, creating new jobs, economic growth, new homes and new public realm across the country.
- 1.4. As an established, trusted, partner of choice, each Peel Waters development is delivered in partnership with leading developers, designers, construction firms and investors to create new-style neighbourhoods which offer a wide variety of high-quality, sustainable homes and well-connected communities.
- 1.5. Peel Waters is part of the family run Peel Group, which has been operating across the UK for over 50 years.
- 1.6. The Peel Group is one of the leading infrastructure, transport and real estate investors in the UK, with collective investments owned and under management of more than £5 billion.
- 1.7. The Peel Group also owns a 37.5% stake in Peel Ports, which is the second largest port group in the UK, handling over 70 million tonnes of cargo per year including circa 15% of the UK's total incoming port traffic through its waters.
- 1.8. Peel Ports and its subsidiaries operate as the statutory harbour authority for ports including the Port of Liverpool, the Manchester Ship Canal and the River Medway, including the Port of Sheerness and the remaining commercial port activity at Chatham Docks Industrial Estate.

The Site

- 1.9. The extent of Peel's interest comprises over 40Ha of previously developed, waterfront land, close to Gillingham and Chatham town centres, adjacent to the

three Medway Universities (Greenwich, Kent and Canterbury Christ Church) and next to the new communities of St Mary's Island and Chatham Waters.

- 1.10. These representations relate to the redevelopment proposals at Chatham Docks Industrial Estate (CDIE), the final phases of Chatham Waters and the former dock railway link to Gillingham (pink on the plan below).



- 1.11. This under-utilised land comprises a fantastic strategic opportunity for sustainable regeneration, investment and development. It presents an opportunity to transform under-utilised brownfield land into a new high quality and vibrant place, that connects existing communities and attracts new businesses and delivers homes for the future, closely aligned with and essential to help deliver the Council's vision and strategic objectives set out in the draft Plan.

Progress to date

- 1.12. Peel has been promoting the overall CDIE for transformative regeneration through various 'calls for sites' since 2008 and the transformation of the docks has already begun following grant of planning for Chatham Waters on a 12Ha part

of the wider site in 2013. Since then, infrastructure and development work has been delivering strategic regeneration for almost 10 years including:

- New infrastructure comprising a new junction to improve vehicular access to Chatham Waters and future development along with new flood defences and sustainable drainage
- New public realm providing public access to Basin 3 for the first time
- New commercial development including foodstore, family pub and a University Technical College
- 199 new homes for market sale and 192 homes for private rent
- 237 new affordable homes (shared ownership and affordable rent) about to complete
- 74 bed care home under construction
- Waterfront retail stores

- 1.13. To date, over £125m has been invested at Chatham Waters which has led to a new community becoming established, and development is ongoing pursuant to the original application which consents a further 300+ new homes along with an event space and further public realm along the riverside.
- 1.14. The CDIE has been operating as a commercial industrial port since the government closed the naval base in the mid 1980s. It currently accommodates 22 tenants, five of which use the port facility, including the largest operator, ArcelorMittal, which provides reinforced steel to the construction industry.
- 1.15. Other more general industrial and waste recycling businesses operate from the site which has led to an increasing number of complaints from residents on St Mary's Island relating to noise, dust and air quality, as new residential development has been introduced on land next to the CDIE, which operates 24/7. The overall estate is noisy, dirty and under-utilised.
- 1.16. The 2013 Chatham Waters consent enabled a £7m investment in the refurbishment of the former naval lock gates which was critical to ensure that the commercial port could continue to operate until the existing leases expire in the next few years. The maintenance of the legacy naval infrastructure, including the lock gates, has become unviable.

The potential

- 1.17. Peel will continue to work with the Council, Locate in Kent and the remaining tenants of the industrial estate to help identify relocation opportunities when leases expire for the site to become available for employment and residential led regeneration that will deliver:
- An 8Ha employment zone to develop sustainable, new, flexible, waterfront space to help attract businesses operating in the council's target growth sectors including creative and innovative technical business; healthcare; IT and digital as well as key employment and supporting uses.
 - Circa 3,000 new homes comprising a mix of market and affordable dwellings, apartments and houses for sale and rent (with circa 500 additional homes at Chatham Waters and circa 2,500 on the remainder of the existing Chatham Docks Industrial Estate), critical to help the council meet its identified housing needs
 - New links and waterfront access for the first time ever, to join and integrate with the existing communities of St Mary's Island and Victory Pier and with other stakeholders including the universities
 - A new green pedestrian and cycle link to Gillingham utilising the former dock railway line breaking down existing barriers and linking the site and St Mary's Island, the Medway Universities, and surrounding communities with Gillingham town centre
- 1.18. An initial concept masterplan was prepared for the latest council 'call for sites' in February 2023 and an updated version is enclosed at **Appendix 1**. This sets out the overall concept in more detail.
- 1.19. Overall, the emerging Local Plan presents an opportunity for the Council to support the transformation of this strategic waterfront site through its allocation which could unlock over £1Bn of capital investment in Medway's waterfront, which is critical if the vision and strategic objectives of the plan are to be achieved. Strategic development here would generate many new employment opportunities in the council's target growth sectors as well as other jobs relating to a large mixed-use proposal and substantial numbers of construction jobs and wider supply chain opportunities.

- 1.20. Against this introductory context, in the following sections we provide comments on the Regulation 18 draft plan with sections corresponding to each of the relevant sections in the Plan.
- 1.21. Through these comments we set out how the regeneration of this noisy, dirty and under-utilised industrial estate can be planned to become a fantastic new destination, healthy place to live and a sustainable place to work, with new access to open space, the River Medway and its waterfront, and green links and connections to surrounding communities, universities and town centres.
- 1.22. Overall, it's a strategic brownfield waterfront site that is critical to help meet the council's vision and strategic objectives, its employment and housing needs.

2. Context

- 2.1. The initial section of the Regulation 18 Plan sets out some useful contextual points, including that the council wants *'Medway to be a healthy place to live with clean air, high quality, well designed housing, green spaces for people to enjoy, places for people to mix, and job opportunities to support a good quality of life'* (p2.2)
- 2.2. As a coastal area, the council recognises (p2.5) that Medway is vulnerable to rising sea levels and the new Local Plan will help secure a more resilient future. The river itself is seen as a key asset, providing a strong sense of place and identity (p2.6) and there is a clear objective to reduce car dependency and improve sustainable transport connections.
- 2.3. The Plan (at p2.8) recognises that the good transport links with London and the cluster of universities and colleges are strengths that provide opportunities to attract more businesses to set up locally and redress the flow of commuters from Medway to jobs in London (which is central to Medway's economic strategy).

Comments

- 2.4. Peel agrees with these important objectives and believes that its transformative and strategic regeneration plans for Chatham Docks Industrial Estate and the remaining land at Chatham Waters will greatly assist Medway Council in achieving these objectives. The proposed development will deliver:
 - Flexible modern employment space immediately adjacent to the university cluster to attract businesses in the council's target growth areas that will help retain talent within Medway
 - High quality, well designed residential development with a broad mix of typologies and tenures (circa 3,000 units) to help meet market and affordable housing needs
 - A further 2km of waterfront opened up as public realm comprising riverside and dockside walkways, green spaces and new footway and cycle connections for people to enjoy
 - Resilient development with improved flood defences and sustainable drainage

- Strong new sustainable green connections linking existing communities, the universities and Gillingham town centre, reducing car dependency and opening up this part of the riverside to the public for the first time in its history.

3. Vision for Medway in 2040

3.1. The draft plan sets a strong vision for 2040 which encompasses many objectives. The Peel Waters vision for the proposed regeneration of the wider remaining industrial estate at Chatham Docks is clearly aligned with the council's vision and objectives. The strategic regeneration of this previously developed waterfront site will help Medway achieve its 2040 vision through various means including:

- Helping develop a thriving economy through the provision of flexible new employment units that provide high quality modern space, fronting and transforming the southern edge of the dock basin with a new landscaped corridor that provides pedestrian and cycle connectivity between St Mary's Island through Chatham Waters to Victory Pier.
- Quality employment space that sits immediately adjacent to the cluster of universities and university technical college, will maximise the potential to attract inward investment and businesses in the council's growth sectors including innovation and creativity and helping retain talent in Medway.
- Introducing public access for all *for the first time ever* to this section of the Medway waterfront, creating a new riverside walkway connecting the existing community at St Mary's Island with Victory Pier along a continuous route. Circa 3km of new riverside and dockside walkways and public boulevards will be created across the Peel Waters estate.
- Significantly more connectivity is proposed through additional walkways and new public spaces throughout the site along with a sustainable new green pedestrian and cycle route directly connecting the site (and its surrounding communities, employment, and education facilities) with Gillingham along the line of the former dock railway.
- Collectively, these new measures will be available for all and help transform connectivity in this location, introducing significant green, inclusive choices and lead a clear push for reduction in car dependency in this part of the borough.
- Delivering a range of quality residential accommodation at reasonably high density to make best use of previously developed land will help minimise the need for loss of countryside and development in less sustainable locations.

- The residential development will be designed with new integrated flood defences and will therefore be resilient to climate change.
- The development will include affordable homes and a mix of tenures and housing types. Approximately 500 additional units are proposed on the remaining land at the waterfront at Chatham Waters and the wider industrial estate site can accommodate circa 2,500 new residential units, thereby contributing significantly to Medway's housing need over the plan period and beyond.
- Provision of other facilities including local retail, education and health facilities on site, or through appropriate planning contributions where appropriate.
- The mixed-use development proposed will help to strengthen the distinctive character of Medway and provide a healthy place to live and work, contributing to a future lower carbon economy.
- Overall, this strategic site will greatly assist Medway in its 2040 vision of becoming a leading regional city.

4. Strategic Objectives

- 4.1. What Medway Council wants to achieve from the Local Plan is set out in four strategic objectives. In each case, the proposed regeneration of CDIE will assist the council in achieving the objectives in various ways as summarised below.

Objective 1 - Prepared for a sustainable and green future

- 4.2. The comprehensive regeneration of land at Chatham Docks Industrial Estate will help the authority prepare for a sustainable and green future including in the following critical ways:

- Efficient use of brownfield land - land is a scarce resource and this strategic brownfield site, located in the urban area between river frontage and universities, within reach of existing services and transport nodes in Gillingham and Chatham provides a rare opportunity for comprehensive, efficient and higher density development to help meet employment and housing needs in a more sustainable manner.
- Mitigation - the redevelopment of previously developed land will introduce new more resilient flood defences, sustainable drainage and more robust green and blue infrastructure networks and spaces as a part of a more sustainable and green future.
- Energy efficiency - new buildings and the overall masterplan will comply with latest building standards (BREEAM 'Very Good' and 'Excellent') to reduce energy and carbon consumption and suitable opportunities for green energy generation will also be considered where feasible.
- Investment in new safe footpaths and cycle ways will improve connectivity and help provide greater choice to support the shift away from car dependency, helping to reduce carbon impact.
- Relocating the existing industrial and waste transfer uses away from the site will help improve air quality and reduce industrial related traffic in this central urban and mixed-use location.

Objective 2 - Supporting people to lead healthy lives and strengthening our communities

- 4.3. The regeneration of land at Chatham Docks Industrial Estate, in addition to the final phase at Chatham Waters, will directly help achieve this objective through its potential to deliver high quality, energy efficient homes that are essential to help meet the housing needs of Medway's communities. The site ultimately offers the potential to deliver an additional circa 3,000 new homes with a range of sizes, types and affordability, including provision for specialist and elderly housing.
- 4.4. The attached delivery schedule at **Appendix 2** sets out how new homes could potentially be delivered on the site over the plan period to 2040, recognising that delivery is also likely to continue beyond the plan period. Overall, we estimate that as many as circa 2,475 could be delivered by 2040 at an approximate average delivery rate of 160 units per year for 15 years from 2026. In reality, the delivery will come in larger lumps as blocks of residential development are completed.
- 4.5. The initial masterplan at **Appendix 1** identifies the extent of potential new green space throughout the site and the opportunity, therefore, for the residents of new homes and existing residents in the surrounding communities to greatly benefit from new public realm and access to the new riverside walkway, helping ensure a healthy living environment and importantly connecting the existing communities of St Mary's Island with Victory Pier and Gillingham beyond.
- 4.6. Investment in new public realm will help reduce inequalities in health and deliver better outcomes for residents, by promoting opportunities for increasing physical activity and mental wellbeing, in line with the council's strategic objective.
- 4.7. The proposed new green link with Gillingham town centre will help strengthen its role through providing a sustainable link between the residential communities to the north of the town centre with the high street, helping support retail, community services and start-ups, encouraging new business uses into the High Street in line with this strategic objective.

Objective 3 - Securing jobs and developing skills for a competitive economy

- 4.8. The council is seeking to boost the performance of the local economy by supporting local businesses to grow and innovate; and attracting inward investment and re-locations, through the provision of a portfolio of good quality employment land that meets the needs of businesses; and to secure and extend higher value employment opportunities; and reduce out-commuting.

- 4.9. The proposed redevelopment of Chatham Docks Industrial Estate will deliver new, high quality and flexible employment space fronting Basin 3 that will help attract higher value employment opportunities in the council's target growth sectors including creative industries and advanced manufacturing. It is estimated that job numbers could triple in the new employment zone, alongside significant numbers of construction jobs associated with the overall investment over the plan period and many other opportunities relating to the overall development that could include hotel, restaurants, bars, retail and leisure uses.
- 4.10. The proposed employment zone by the universities offers the opportunity for local businesses to grow and innovate and will increase the potential to attract inward investment for businesses looking to tap into a significant graduate skills base, helping to develop and maintain higher skilled work opportunities in Medway.

5. Developing a Spatial Strategy

- 5.1. The development plan is the critical tool in setting a spatial strategy for delivering future homes, creating job opportunities and new places that are required to meet Medway's needs over the plan period.

Development needs

- 5.2. The Regulation 18 draft highlights the extent of the requirement for new homes (circa 29,000 over the plan period) and identifies that the council must plan positively to meet Medway's development needs as well as planning to protect natural resources and historic features.
- 5.3. In seeking to meet this need, the council has looked at its potential land supply and, accounting for an existing pipeline of 7,500 homes not yet built and windfall allowance of 3,000 homes based on past rates, is looking to identify land allocations to deliver 19,000 new homes by 2040.
- 5.4. Including through its call for sites, the council has undertaken a Land Availability Assessment which has identified potential capacity for circa 38,000 homes, but many sites have constraints including environmental considerations, infrastructure requirements and viability. This potential capacity is identified across four categories of location comprising:
- Urban regeneration (11,625)
 - Suburban growth (9,691)
 - Rural development (14,621)
 - Green Belt loss (2,824)

Helping meet the need for homes at CDIE and Chatham Waters

- 5.5. The land that Peel is promoting through these representations comprises urban regeneration that could deliver circa 2,475 homes over the plan period, based on the estimated delivery rates set out at **Appendix 2**.
- 5.6. That is **13%** of the 19,000 requirement - all on previously developed, accessible land that will be available for urban regeneration from 2025.

- 5.7. Although there are site constraints, these are well known because of the development that has been ongoing at Chatham Waters for the past 10 years and Peel is confident that a robust and comprehensive approach to regeneration will be a viable proposition.
- 5.8. As set out in the initial concept masterplan, the site could accommodate taller buildings as a part of the mix, to help maximise the potential of the waterfront location and ensure a density of development is delivered to reduce the pressure on less suitable land elsewhere.
- 5.9. Redevelopment of this brownfield waterfront site will take full account of environmental and historic constraints and help raise awareness of past uses through ensuring that the overall development is accessible and becomes a new destination for the whole surrounding business and residential communities.
- 5.10. As the Regulation 18 draft plan indicates, the transformation of Medway's urban waterfront has been at the forefront of Medway's regeneration and has attracted £millions of funding and has delivered substantial positive change.
- 5.11. Peel strongly supports a strategy that prioritises urban and waterfront regeneration, ahead of less sustainable development in rural areas or through release of Green Belt land.

Helping meet the need for jobs

- 5.12. As set out above, CDIE currently accommodates a mix of industrial uses, warehousing and waste recycling that are not readily compatible with the adjacent development on St Mary's Island.
- 5.13. The proposal is to continue to work with the relevant authorities to help identify relocation opportunities for the occupiers, to retain existing jobs and, in parallel, to bring forward an application for a new employment zone on the 8Ha parcel between Pier Road and the water basin that could triple the number of jobs in this part of the site depending on the end mix.
- 5.14. The intention is that this parcel of land will be transformed and deliver circa 31,000m² of flexible employment space, fronting the water and located close to the university cluster, tapping into, and seeking to help retain talent in Medway.
- 5.15. A new pedestrian and cycle corridor will be introduced along the dock edge as a part of the application, providing a new route and connection between St Mary's Island and Chatham Waters.

- 5.16. The site will generate a net uplift in employment opportunities, leading to an increase in the number of well-paid high-skill jobs in the area. There would also be a net uplift in economic productivity which would further support the council's ambitions for high value and high growth sectors in the local area.
- 5.17. The successful regeneration across St Mary's Island in recent years has brought new communities and homes immediately adjacent to unconstrained industrial activity at Chatham Docks Industrial Estate and the redevelopment of the site for modern, high quality employment use, new homes and open space will remove this conflict in land use terms whilst safeguarding existing jobs through relocation of existing businesses.
- 5.18. Peel Waters is a strong advocate of repurposing and transforming former industrial docklands which can deliver significant and sustainable positive impacts, delivering homes and jobs as part of new communities. As such, it supports the strategy or waterfront regeneration in this location.
- 5.19. The regeneration of the wider site will deliver significant numbers of new construction jobs over the plan period along with many other opportunities relating to the mixed-use development.
- 5.20. At Chatham Waters, Peel has already been delivering transformative change for over 10 years and a new community has become established at the docks. This existing and ongoing development will prove a useful catalyst for future development across the remainder of the estate.
- 5.21. Peel Waters is a very capable promoter, developer and regeneration partner and is keen to help support the council in achieving its vision and strategic objectives through the development of its remaining estate at Chatham Docks Industrial Estate and Chatham Waters.

6. Conclusion

- 6.1. Overall, the regeneration of Chatham Docks Industrial Estate is critical if Medway is to meet its identified housing requirement and employment targets. The site presents the opportunity to deliver circa 31,000m² of modern and flexible employment space along with 3,000 new homes (including circa 500 homes as part of the final phase at Chatham Waters).
- 6.2. Peel Waters supports a strategy that focuses on urban regeneration ahead of less sustainable growth alternatives, which rely on rural development or Green Belt release. However, to meet the overall requirements, Peel Waters recognises that there will need to be growth across Medway, including on suburban expansion sites and some rural development.
- 6.3. Peel Waters reserves its position to comment further on the emerging local plan policies and looks forward to continued engagement with the council and other key stake holders in helping to deliver strategic change including planning for future employment and new homes to meet Medway's needs.

Appendices

Appendix 1 - Initial Masterplan

Peel L&P

Chatham Docks Industrial Estate & Chatham Waters

Draft Masterplan

Client



Project Team

Jon Matthews Architects



1.0 Location & Executive Summary	4
2.0 Site Analysis	8
3.0 Key Moves	11

1.0 Executive Summary & Site Location

Executive Summary

The purpose of this draft masterplan document is to support the proposed site allocation of Chatham Docks Industrial Estate and the remaining undeveloped land at Chatham Waters in the emerging Medway Local Plan through the September / October 2023 Regulation 18 Consultation.

It provides a high level summary of the opportunity to redevelop this 40 Hectare strategic brown field site which can deliver an additional 3,000 new homes and circa 30,000m² of employment space along with other mixed-uses.

Peel L&P is committed to support the long-term ambitions of Medway Council in connecting and creating high-quality mixed-use neighbourhoods and believes the Chatham Docks Industrial Estate site offers a unique opportunity to deliver a new residential and employment Strategic Site which will add to and complement the successful Chatham Waters development and would likely generate circa 650 and 710 jobs on-site, an increase compared to the employment currently supported.

Peel L&P has commissioned Jon Matthews Architects, established master planners who were involved in the original Chatham Waters Outline Planning process, to assemble the draft Chatham Docks Industrial Estate masterplan. The principles of this draft masterplan highlight that the industrial estate can provide a deliverable, sustainable mixed-use community providing circa 2,500 new homes and 30,000m² employment space along with associated amenity and services required to serve this new neighbourhood. An additional 500 new homes can be accommodated on the remaining undeveloped land at Chatham Waters.

We have sought to investigate the site and local context in order to carefully develop a proposal that connects the existing neighbourhoods of St Mary's Island and Gillingham Pier, whilst building upon the success of Chatham Waters and helps to open up the River Medway via creating new pedestrian corridors and open spaces. Our proposal has also considered the enhancement and accessibility to the site's heritage assets.

- This draft Masterplan document includes the following information:
- An indication of the intended vision for the site and an explanation as to how the form of the development will achieve that vision;
 - An illustrative plan for the whole site;
 - Quantum of development, type of uses, building height parameters;
 - An indication of the proposed phasing of the development;
 - An indication of the location of other proposed mixed uses to be provided, which may include employment, leisure facilities, small scale ancillary retail uses, bar/restaurant uses, and community facilities;
 - An indication of the location and amount of public open space/informal recreation areas to be provided within the development;
 - An indication of how development will maximise the potential of the waterfront and provide active frontages to the Medway Estuary
 - An indication of how the proposed development will be integrated with existing communities on St. Mary's Island, Chatham Waters, with the universities and other neighbourhoods beyond;
 - An indication of vehicular access arrangements to the site, proposed internal road, footpath and cycle infrastructure and linkages to public transport and external access networks, informed by Peel L&P and traffic consultants, TTHC.
 - Consideration of the infrastructure requirements/viability assessment criteria that may influence the form of development, including in relation to flood risk, drainage, contamination and impact on designated and non-designated heritage assets

Peel L&P is committed to delivering “long term” place making at Chatham Docks Industrial Estate in partnership with Medway Council, developers, local businesses, educational establishments and employers.

Peel L&P is working with Medway Council and Peel Ports to help identify opportunities for the relocation of existing businesses from the industrial estate to help retain jobs. The site will become available in 2025 once the existing tenant leases have expired and the port operation is closed.



Site Location

Located in the South East of England, Chatham Docks Industrial Estate was once part of the Royal Dock yards. It includes both the ongoing development on Chatham Waters, the existing Chatham Docks Industrial Estate and the historic railway extending south



Key



Chatham Docks Industrial Estate including Chatham Waters and former dock railway line to Gillingham



- Key
- Ownership Boundary
 - Future Development
 - Ongoing Development
 - Education Buildings
 - Higher Education Buildings
 - Retail/Commercial
 - Train Station
 - Key Open Space

2.0 Site Analysis - Chatham Docks Industrial Estate Strategic Site

Uses

Key

Ownership Boundary

Future Development

Chatham Waters: Ongoing Development

Education

Commercial

Residential



Movement

Key

Ownership Boundary

Future Development

Chatham Waters: Ongoing Development

Vehicular Routes

Dock Access

Pedestrian Routes

Existing Pedestrian Bridge

Major Road Infrastructure



Frontage

Key

Ownership Boundary

Future Development

Chatham Waters: Ongoing Development

Frontages



Environmental

Key

Ownership Boundary

Future Development

Chatham Waters:
Ongoing Development

Prevailing Wind

Sun Path

Noise Source



Flood Risk

Key

Ownership Boundary

Flood zone 3

Flood zone 3 Areas
Benefitting from Flood
Defences

Flood Zone 2



Building Heights

Key

Ownership Boundary

Future Development

Chatham Waters:
Ongoing Development

>15 Storeys

9-14 Storeys

4-8 Storeys

0-3 Storeys



3.0 Key Moves - Chatham Docks Industrial Estate Strategic Site

3.1 Wider Site Analysis
Key Moves

- Key
- Chatham Docks: Future Development
 - Chatham Waters: Ongoing Development
 - Key Open Space
 - Education Buildings
 - Higher Education Buildings
 - Retail/Commercial
 - Train Station
 - Building Plots
 - Proposed Building Plots
 - Vehicular Routes
 - Pedestrian Routes
 - Pedestrian Bridge
 - Major Road Infrastructure
 - Parks

See Page 13



Key Moves

The analysis collated within in the previous chapter will become a driver to inform the general layout and principles of the masterplan evolution along with maximising the site's unique waterside aspect.

In this section we use our social, economic and environmental analysis to set out the principles behind the key moves that would inform a legible and deliverable masterplan. We explain how these principles, including the need for appropriate access will inform a deliverable framework for Chatham Docks Industrial Estate.

Uses

To the south of the site there are residential, mixed-use and commercial building plots. Across the marina there are a further mix of appropriate uses that offers a waterside setting for both residential and mixed-use development that seeks to capitalise on this unique setting.

Appropriate scale

The proposed heights across the framework areas are set out into zones increasing along the waters edge to a maximum height of 20 storeys, strategically located as an opportunity for a landmark building. The use of height along the waters edge will maximise the opportunity for waterfront living, river aspect and amenity at ground level. Residential buildings at the core of the masterplan sit within a parkland setting.

Commercial opportunity

The 8Ha commercial zone has been sited adjacent to the universities and UTC and has potential to deliver circa 100,000m² of new floorspace and target Medway's identified growth sectors including creative and innovative technical business; healthcare; education; IT and digital and will provide flexibility to cover key employment and supporting uses in classes B, C1, E and F. Overall, there is an opportunity to generate 650 and 710 jobs on-site, jobs within this proposed employment zone.

Open Space

Areas of key open space are allocated throughout the site providing a range of high quality public amenity. This will establish an identity and help create landscape characters within the site. Key vistas will connect the parks and open spaces with new permeable links extending beyond the masterplan to the surrounding areas.

Views

Maximised waterfront capitalising on the opportunity for a waterside aspect

Frontages

A strong frontage along the water creates opportunity to maximise amenity and activity to the dock edge whilst linking with an established Chatham Waters marina frontage .

Activate the Waterfront

The waterfront is brought into active amenity. These uses can also extend into and throughout the development. The waterfront is accessible to all linking wider reaching residential communities along river Medway.

Waterside Amenity

Residential mixed use developments sit along the waterfront with commercial public amenity at ground level. Public open space along the waters edge creates a strong sense of place and identity. New pedestrian and cycle routes can be extended around the perimeter of the site to connect with a much wider and far reaching existing and emerging networks, including the proposed green link to Gillingham High Street along the line of the former dock railway. The opportunity for such an extensive link to the waters edge with well connected, permeable links to a much wider community is truly unique. The proposed green link presents a far wider opportunity for public benefit as it will help reconnect neighbourhoods on either side of the former dock railway and will provide a direct cycle and pedestrian route for the universities and existing residents of St Mary's Island and surrounding communities to the train station and town centre.

Gateways & Landmarks

Five opportunities for gateways and landmarks have been identified, predominantly at the entrances and key nodes within the site. These are strategically located along the waters edge whilst a new central open space amenity is identified at the core of the site that connects the marina with the river.

3.3 Chatham Docks and Chatham Waters Key Moves



3.3 Chatham Docks and Chatham Waters Key Moves

Infrastructure

Key

Ownership Boundary

Chatham Docks: Future Development

Chatham Water: Ongoing Development

Key Vehicular Routes

Pedestrian Bridge

Major Road Infrastructure and Site Entrance



Open Space

Key

Ownership Boundary

Chatham Docks: Future Development

Key Open Space

Vehicular Routes

Pedestrian Routes

Dockside Amenity

Parks



3.3 Chatham Docks and Chatham Waters Key Moves

Development Framework - Docks Strategic Site

Key

Ownership Boundary

Chatham Docks: Future Development

Existing Education Buildings

University of Greenwich

Retail/Commercial

Landmark Building

Key Open Space

Building Plots

Proposed Building Plots

Key Waterside Amenity

Vehicular Routes

Pedestrian Routes

Views

Riverside Aspect

Primary Frontages

Dockside

Pedestrian Bridge

Major Road Infrastructure

Parks

Placemaking

Pedestrian, Cycle and Emergency Access over Existing Caissons



Simple, elegant design.

Appendix 2 - Indicative Housing Delivery Rates

Chatham Docks - Anticipated timetable for delivery

	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	Total in plan period	Beyond plan period	Total site delivery
Local Plan consultation																					
Local Plan examination - Inspectors Report																					
Local Plan adoption																					
Submit and secure outline planning permission																					
Vacant possession of site																					
Condition discharge / implement consent																					
Infrastructure works / flood defence etc																					
Earliest delivery or residential development																					
Family Housing					75	75	75	75	75	75	75	75	75	75					750	0	750
Private rented apartments							200				200								600	200	800
Open market apartments								375					375					375	1125	325	1450
Total new homes																			2475	525	3000

Note: % of affordable homes to be delivered in accordance with policy requirement subject to viability



**REGULATION 18 LOCAL PLAN CONSULTATION
MEDWAY COUNCIL**

**REPRESENTATIONS MADE IN RESPECT OF LAND ADJACENT
TO FARM COTTAGES, LODGE HILL LANE, CHATTENDEN**

ON BEHALF OF MR HG & MRS DR KEMSLEY



LEE EVANS PLANNING REF: 9314

OCTOBER 2023

1. INTRODUCTION

- 1.1 Lee Evans Partnership LLP is instructed by Mr HG and Mrs DR Kemsley (hereafter, the Landowners) to submit representations to the Regulation 18 Draft of the Medway Local Plan 2040.
- 1.2 The Plan outlines the scale and distribution of new development which is required to meet Medway's needs to 2040. It further identifies the planning principles and policies to guide decisions on all new developments, including through a series of broad locational strategies during the plan period to 2040.
- 1.3 This response offers the Landowners' initial view on whether the Plan satisfactorily meets – or is aligned to meet – the strategic vision and objectives as currently drafted through its spatial strategy. It makes specific reference to land interests at land adjacent to Farm Cottages, Lodge Hill Lane, Chattenden. This Site is available, achievable and deliverable for residential development in the plan period up to 2040.
- 1.4 This response advocates for the continued targeted distribution of growth across the authority area, including in urban, suburban and rural locations to meet need.
- 1.5 In line with this, the case in support of the positive assessment of – and subsequent allocation of – the Site is made throughout this representation, which in summary emphasises that:
 - Through the preparation of the new Local Plan, the Council needs to allocate an appropriate level of housing to be provided up to 2040 to accord with the requirements of the NPPF;
 - Additional housing at the scale proposed would be appropriate at Chattenden either as a stand-alone development on the edge of the existing settlement or as part of a larger development around Chattenden alongside other nearby land being promoted for allocation and those sites which already have planning permission in order to support the Council's preferred development scenarios;
 - The allocation of the site for residential development would contribute towards the Council's market and affordable housing supply making a significant contribution to the Council's housing requirements;
 - The Site is in a suitable and sustainable location for major development. It has existing public transport links in close proximity and is near to the A228 which

provides a main road link into Hoo and to the major towns to the south of the River Medway, ensuring that future residents would have good access to services, facilities and employment through links to major transport nodes across the county and into London;

- The development would be viewed in relation to the context of existing built development at Chattenden and by virtue of its location would not impact upon the wider open countryside or the open setting of the A228. Whilst the site is currently within an Area of Local Landscape Importance (as defined by the adopted Medway Local Plan 2003) it is considered that residential development of the site would be able to be successfully integrated into the landscape through an appropriate landscaping scheme and that the development would conserve and enhance biodiversity through green infrastructure, ecology and wildlife benefits including habitat creation measures; and
- The provision of new housing development in this location would create economic benefits including spending on construction, creation of additional jobs, additional Council Tax payments, New Homes Bonus to Medway Council and additional expenditure in the local economy.

1.6 It should be noted that the subject to the ongoing evolution of the Plan, there is the potential for a planning application – supported by relevant technical inputs – to be prepared and submitted, evidencing the overarching deliverability of the Site in line with the aspirations of the Plan as drafted.

1.7 The following comments are therefore set out in a positive and constructive manner intended to aid the clarity and implementation of the Plan, structured around the following sections:

- **Section 2** of this Statement describes the representation site and its surroundings.
- **Section 3** sets out commentary on the Plan as drafted, with reference to its Vision, Objectives, and key policies;
- **Section 4** summarises the case in support of the adoption of the Plan

1.8 On behalf of the Landowners we strongly advocate for the continued inclusion of a broad and ambitious approach to development across the authority area, in a range of locations.

1.9 We welcome the opportunity to further assist or provide comment on the preparation of the Plan which will help shape future development in the area; and we welcome look forward to the opportunity to participate at later consultation stages.

2. SITE DESCRIPTION

- 2.1 The representation site 780 extends to approximately 4.07 hectares of land currently used for the keeping and grazing of horses. A site plan is attached at **Appendix 1**.
- 2.2 Access into the site is directly off Lodge Hill Lane, adjacent to a dilapidated rural building. At the front of the site to the west is a pair of cottages (known as Farm Cottages).
- 2.3 The site is undulating and ground levels steadily rise across the site from west to east, before plateauing at its eastern boundary.
- 2.4 To the north of the site are more grazing fields and the grounds of Chattenden Farm. Beyond Chattenden Farm is part of the former Chattenden and Lodge Hill Military Camps.
- 2.5 The eastern boundary of the site adjoins the Council owned former Deangate Ridge Golf Club which closed in April 2018.
- 2.6 To the south of the site is an existing residential development accessed off Lodge Hill Lane (allocated by Policy H1 of the adopted Medway Local Plan 2003 for 47 units – Ref: MC001) and an agricultural field which forms part of a larger site that has historically been the subject of a planning application for up to 530 dwellings as part of a large mixed use development. The wider Hoo Peninsula is widely acknowledged as a central component of Medway's previous local plan preparation, and a wide evidence base exists to support such.
- 2.7 To the west of the site on the opposite side of Lodge Hill Lane is another part of the former Chattenden and Lodge Hill Military Camps including a number of vacant, dilapidated former residential dwellings.
- 2.8 To the south-west of the site is the Lodge Hill Recreation Ground and further residential development accessed off Lodge Hill Lane, including Chattenden Community Centre. This development was part of the allocated site MC001 referred to above. Also to the south of the site are bus stops serving Chatham and Hoo.
- 2.9 The site is located in Flood Zone 1 and is therefore deemed to be at less than 0.1% chance of flooding in any year.
- 2.10 The site contains a Grade II Listed First World War sentry post, which forms part of a group of six sentry posts in the area and which would be protected in the event of development.

- 2.11 Land to the west of Lodge Hill Lane and to the north of Chattenden Farm is located within the Chattenden Woods and Lodge Hill SSSI, an area of ancient woodland and rare grassland, supporting a large nightingale population.

3. REPRESENTATIONS TO REGULATION 18 LOCAL PLAN CONSUTLATION

- 3.1 As above the Local Plan 2040 Regulation 18 Submission (The Plan) establishes the scale and distribution of new development which is required to meet Medway Council's needs to 2040, identifying a series of growth areas (to later inform site allocations) and detailed development management policies against which development proposals will be assessed during the plan period.
- 3.2 This follows a period of evidence-gathering, and previous consultation on former draft iterations of the Plan, a commentary against which is not provided here given the extensive period of plan making undertaken over a period in excess of a decade. It is noted that the Plan at this stage has been published only a few months since the formation of a new political leadership within the authority, and seeks to revisit the strategic policies and approaches to deliver sustainable development locally.
- 3.3 Detailed commentary is provided herein on the Vision, Objectives, and Policies of the Plan where outlined. Commentary is not provided for all policies, and is instead reserved for those considered of most relevance to the land interests cited here. We note, however, that the consultation document does not provide detailed policies or preferred sites for development, and instead deals primarily with broader policies and ideas.
- 3.4 Due regard has been had to the wider evidence, and where necessary cross-reference has been made to the LPA's evidence as available as part of this consultation process.

OVERARCHING VISION & OBJECTIVES

- 3.5 The Overarching Vision for Medway is described as "*establishing Medway as a leading regional city connected to its surrounding coast and countryside, with a thriving economy where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets*". This as an overarching vision is supported as a high level principle underpinning the aspirations of the Plan.
- 3.6 The Vision goes on to outline Medway as a location where "*all sectors and ages of the community can find decent places to live*" and where "*the quality of new development has enhanced Medway's profile, and driven up environmental standards in construction...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*". The continued aspirations for Medway as a quality place to live are also supported in full.

- 3.7 Supporting this overall vision, the Plan identifies a number of strategic objectives in planning positively for development and infrastructure whilst conserving and enhancing the natural, built and historic environment.
- 3.8 Whilst commentary is not provided for each of these objectives, due regard has been had to their content. *In particular, the Landowners support aspirations to provide high quality energy efficient homes that meet the housing needs of Medway's communities, reflecting the range of sizes, types and affordability the area needs including provision for specialist housing.* This objective is consistent with the thrust of the National Planning Policy Framework in its pursuit of sustainable development. Again, this is supported overall at the District-wide level as an appropriate and realistic vision for Medway over the plan period.
- 3.9 It is considered that the objectives are generally appropriate in supporting the implementation of the Vision, and that the objectives themselves are adequately reflected across the strategic policies as proposed, albeit subject to any refinement that may follow during the Examination process and later consultation stages beforehand.

STRATEGIC POLICIES

- 3.10 Policies around the spatial strategy within the plan period will be refined and published in due course, although it is recognised that an early indicator of the potential strategic direction of policy is provided, specifically around housing growth.
- 3.11 Preamble to this section expresses clear linkages to the overarching vision for the Plan, and its objectives in focusing growth at sustainable locations providing greater choice of high-quality housing to meet identified needs.
- 3.12 Detailed commentary is provided against the calculated methods for housing need. Typically in plan-making, need is derived from household projections and targets set by central government. Question is raised in this iteration of the Plan around the discrepancies between figures provided by central government, and those of alternative forecasted housing need.
- 3.13 It is of key importance that the Plan provides sufficiently for housing growth to meet need, however this is compiled. Our strong recommendation is that close review of the Central Government figures is undertaken during plan-making, and that the directives issued by Government are adhered to. These figures are provided to ensure that the housing crisis is adequately tackled over an extended period of time. To underprovide risks diluting Medway's ability to meet its need up to 2040, and would risk the utility of the Plan as a

whole. Pleasingly, the Plan does at this stage consider need of 28,500 over the period which reflects the Central Government figures.

- 3.14 The housing growth strategy is geared towards delivery of such. This baseline position of meeting identified need is wholly supported.
- 3.15 At this stage, it remains appropriate to consider a broad growth strategy and in this regard it is useful to have sight of the Council's housing land supply.
- 3.16 We recognise the early stage approach of the Council in providing for both pipeline development, and windfall sites. We recognise that the Council will therefore seek provision for over 19,000 new homes through allocations. We agree that – based on the currently reported figures – this would be a robust approach to strategic housing delivery.
- 3.17 The currently proposed strategy proposes four broad location-based categories for growth: urban regeneration, suburban growth, rural development, and Green Belt loss.
- 3.18 As a general approach, the Landowners support this approach in maximising the potential delivery opportunities over the plan period, subject to site specific assessment.
- 3.19 The Site controlled by the landowners falls within the rural development category. We agree that rural development offers an opportunity to provide for a range of housing types with appropriate nearby services supplementing those further afield.
- 3.20 As such, the inclusion of a rural development category is wholly supported.
- 3.21 In respect of the potential housing capacity figures (taken from the Land Availability Assessment), we note that 14,736 dwellings are cited as a notional figure. This does not include for the Landowners' Site which remain available, achievable and deliverable and should therefore be included in this potential housing capacity. The Site can deliver either standalone development, or development pursuant to a more comprehensive masterplan and land ownership.
- 3.22 We recognise that work on the Hoo Peninsula as a focus for larger scale growth is ongoing, notwithstanding the withdrawal of Housing Infrastructure Fund monies. We support in principle the continuation of such work, given the opportunity to deliver housing-led development as part of a rural development spatial strategy, on the premise that comprehensive development – to include the Site – poses a genuine opportunity to consolidate development services and infrastructure in a sustainable location with access to wider facilities.

- 3.23 A site location plan is therefore included to allow officers to assess in greater detail.
- 3.24 Commentary on the wider spatial strategy is not provided in detail here, though it is recognised that a combined approach of urban, suburban, rural, and Green Belt development opportunities may support Medway Council in planning for development needs in varied environments to meet need.
- 3.25 It will be of central importance that the Plan allocates a number of sites to ensure a consistent supply of housing to facilitate demonstration of a continuous five-year housing land supply. Again, it is pleasing that the Plan seeks to clearly satisfy this basic requirement as it pertains to delivering on housing need.
- 3.26 It is essential that the Plan is able to meet identified need, and the allocation of multiple sites across the plan area at different scales should enable a reliable supply of dwellings to meet need – again as a minimum target only, rather than a capped ‘ceiling’ figure. This should include for rural development, or development otherwise at the edge of existing settlements.
- 3.27 It is considered that the apportionment of growth across Medway in these diverse locations is appropriate in distributing sustainable growth to support communities in multiple locations in the District. Assessment of the precise scale and quantum of development should be undertaken at the application stage, though the ambition to spread growth opportunities is supported.
- 3.28 Development of the Site would be in keeping with, and at a scale proportionate to, the size and form of the existing settlement, all the while fully cognisant of the sustainable growth of Chattenden at nearby sites and the proposed indicative distribution of growth in such areas underscores the sustainability credentials of the area.
- 3.29 The inclusion of the Site in later iterations of the Plan is considered to roundly accord with the thrust of the Vision and Strategic Objectives set out in the Plan.
- 3.30 The Site is considered to be a logical candidate for inclusion in the Plan at the next stage for the following reasons:
- **Access to Centres** – The site is not located within a local & district centre however it is approximately 1.2 kilometres to the nearest local centre in Chattenden to the south of the A228. The site would however benefit from its close proximity to local bus services which would provide access for future residents to not only Chattenden but also the larger settlement of Chatham.

- **Access to Educational Facilities** – The site is approximately 800-900 metres away from Chattenden Primary School and there are continuous footpaths along Chattenden Lane and Lodge Hill Lane as well as bus stops which would provide access to the school. It is considered that by providing a footpath at the front of the representation site that this would ensure that the school would be attractive for future residents to walk to.
- **Access to Open Space** – The site is less than 100 metres away from an area of open space at Lodge Hill Recreation Ground.
- **Transport** – The site is approximately 150 metres away from existing bus stops on Lodge Hill Lane which provide a number of services to Chatham and Hoo throughout the day, and which in turn would provide connection to larger employment centres and train links to London.
- **Site Access** – Suitable vehicular access could be provided within site ownership or highways land.
- **Landscape and Environment** – The site is located within a landscape of high sensitivity and moderate condition (15 – Deangate Ridge) as identified by the Medway LCA 2011 however development of the representation site would be self-contained and viewed in the context of surrounding development and therefore would not affect the characteristics for which the wider landscape character area is designated. Where appropriate all existing trees and hedgerows within and adjacent to the site would be preserved and integrated into the scheme and new landscaping and planting would provide appropriate buffers, which can also function as biodiversity corridors.
 - The site is located to the south and east of the Lodge Hill SSSI and it is recognised that it falls within an Impact Risk Zone. Detailed assessment of any impact of the development upon the SSSI and any mitigation and enhancement measures that may be required would be incorporated into any development proposals.
- **Heritage** – As outlined above there is an existing Grade II Listed First World War Sentry Post on the site which forms part of a group of six in the area. This should not be considered as a significant constraint to development and would be able to be protected in situ and integrated into the layout of any future proposals.
- **Flood Risk** – The site is in Flood Zone 1 and is not in an area of high surface water flooding. It is therefore at low risk of flooding and a sequentially preferable location for housing development.

- **Air Quality** – The site is not within or adjacent to an Air Quality Management Area. However, traffic generated by the development would be expected to route through the Four Elms Hill AQMA but the site will accommodate less than 200 units so is unlikely to have a significant impact on this management area.
- **Contamination** – There is no evidence of contamination on the site.
- **Agricultural Land** – The site is within an area of Good to Moderate Grade 3 agricultural land, however, is not currently used for agricultural purposes.

3.31 Notwithstanding the suitability of the site as a standalone development, it is submitted that the Council should also consider the suitability of Chattenden to accommodate a greater quantum of development in order to assist with delivering Medway's development needs.

4. CONCLUSION

- 4.1 On behalf of the Landowners we strongly advocate for the inclusion of land adjacent to Farm Cottages, Lodge Hill Lane, Chattenden for residential development.
- 4.2 These representations conclude that the Plan's early stage preparation could provide a sound approach to planning in the authority over the plan period, subject to the detailed preparation and assessment of a wider evidence base and satisfaction of housing need figures.
- 4.3 Specific to the Promoter's interests at 115 Station Road, Bridleway Riding School, Deal the allocation of the Site under SAP16 is considered a sound basis for the delivery of housing in this location, noting that:
- The Site is well-related to the existing settlement – and committed development- and is contained within the landscape and important trees and landscape features will be retained and, enhanced;
 - The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact and in fact provide a betterment to the existing conditions and to be explored in greater detail in the context of a planning application as currently being prepared;
 - The Site falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding);
 - There are no designated heritage assets within or immediately adjacent to the site, and the development is not considered to affect the setting of any Listed Buildings.
- 4.4 We welcome the opportunity to further assist or provide comment on the preparation of the Plan which will help shape future development in the area; and we welcome look forward to the opportunity to participate at plan-making stages where appropriate.



Ordnance Survey (c) Crown Copyright 2018. All rights reserved. Licence number 100022432

LAND TO EAST OF LODGE HILL,
HOO, ROCHESTER
1:1250 @ A3



headley, andrew

From: George Jude Masey [REDACTED]
Sent: 31 October 2023 15:51
To: futuremedway
Subject: Emerging Local Plan for Medway.

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

For attention of Mr Dave Harris.

In previous consultations I have replied in 2016 to "Issues and Options" . In 2017 " Reg. 18 . In 2018 " Development Strategy" and in 2019 " Local Plan Documents" for the then Local Plan, could not that plan have been amended rather than start all over again ! ? My views have not changed from those written in my representation for Reg. 18 sent in 2017. I was disturbed to read that the relocation of Medway City Estate is still being considered! Surely this will deter businesses from starting up in Medway with all the uncertainty . The Local Plan in the past was turned down by an Inspector partly because of not enough employment in relation to homes. Regarding proposed development in Hoo I would be against any on Farm Land , with the state of the world we need to be more self sufficient. With SLAA being reconsidered would it be possible to take out the houses earmarked for Manor Farm Frindsbury. With the School coming on steam with the proposed homes also I fear the roads will not cater, becoming a nightmare to negotiate. It is already difficult to exit Bill St. Road into Frindsbury Road. I have emailed the Leader of the Council regarding Stonehorse Lane, as with the change of party my previous communication was not answered, although Cllr. A Jarrett was going to urge Cllr.A Gulvin to do so. I do hope it can be dealt with under the " Green and Blue Infrastructure " as the strategies cover access to link town with the countryside, and improve routes and PROW which are used by people walking for health . Glad you enjoy living in Medway long may it last.

Kind regards
Judith Masey.

Dave Harris
Head of Planning
Medway Council
Gun Wharf
Dock Road
Chatham ME4 4TR

31st October 2023

Dear Dave

Re: Regulation 18 Local Plan Consultation – Medway 2040

Thank you for the opportunity to comment on the vision for the new Local Plan. As Medway's largest social landlord, MHS Homes are pleased to provide feedback on the consultation document.

By way of background, MHS Homes owns over 9,000 affordable homes in Medway. Over 23,000 people live in one of these homes – this represents 1 in 12 people in Medway. Moreover, MHS Homes are a major developer of new social housing and on average build over 150 new affordable homes each year, most of which are in Medway. Our new homes are developed either through our own 'land led' schemes or via Section 106 agreements with housebuilders. We therefore have considerable 'skin in the game' in relation to the new Local Plan.

At the outset, I would advise that overall, we support the direction of the emerging Local Plan. We feel that the consultation document sets a sound and comprehensive framework to develop Medway's growth up to 2040, whilst considering Medway's natural, built and historic environment.

We share the Council's ambitions for regenerating Medway's urban centres and riverside sites. We also recognise the need for development in suburban and rural areas if future housing need and Local Plan targets are to be met.

We are pleased to see that "people will be at the centre of the Plan" and that "the Plan will consider the diverse communities who make up Medway". The consultation document effectively identifies the big strategic issues (e.g. climate



mhs homes Limited is contracted by Heart of Medway Housing Association Limited to deliver landlord services. If you're a Heart of Medway Housing Association Limited customer please be informed that correspondence to you is sent from mhs homes Limited in its capacity as a managing agent for Heart of Medway Housing Association Limited.



mhs homes Limited 10704997
Registered Charity 1177565
Registered in England and Wales

change, environment, health and wellbeing, deprivation and inequality, regional growth, infrastructure etc) that will shape Medway's growth over coming years.

We would like to comment on the main aspects of the Plan as follows:

Vision for Medway in 2040

The vision is well presented and is one that we could subscribe to. We are pleased to see the commitment that "*all sectors and ages of the community can find decent places to live*". We believe, however, that there should be direct reference to affordable/social housing in the same way that reference is made to 'custom and self-build housing'.

Furthermore, whilst the vision as drafted mentions the 'community' on several occasions, it would be strengthened if a more compelling vision of what the community in 2040 might feel like (e.g. inclusive, diverse, vibrant, proud to live in Medway). What would a successful thriving Medway community look/feel like?

Strategic Objectives

We would support the proposed strategic objectives. However, within these strategic objectives, we would like to see specific commitments to the provision of social housing and to the regeneration of the most deprived neighbourhoods within Medway.

The Local Plan should clearly set out the Council's requirements for affordable housing in residential developments. If the Local Plan is to meet the needs of current and future generations then there needs to be a clear focus on affordable homes to rent. Low cost home ownership (such as shared ownership) meet an important need in the market but should not dominate over the need for affordable and social rent.

The document references the retrofitting of older housing, but we also believe that there is a strong case for an area-based approach to Medway's most challenged neighbourhoods. If planning interventions do not happen in the most deprived neighbourhoods with the poorest housing conditions in Medway, a great opportunity to improve the lives of local people will have been missed.



mhs homes Limited is contracted by Heart of Medway Housing Association Limited to deliver landlord services. If you're a Heart of Medway Housing Association Limited customer please be informed that correspondence to you is sent from mhs homes Limited in its capacity as a managing agent for Heart of Medway Housing Association Limited.



mhs homes Limited 10704997
Registered Charity 1177565
Registered in England and Wales

Spatial Strategy

We understand that the Standard Method formula for Local Housing Need identifies a need for 1,667 homes a year in Medway and that this would require a 'step change' in the delivery of new homes locally. Whilst a formidable challenge, we would support such a target given the housing crisis being experienced locally. The reality for many people in housing need locally is that they may wait many years in unsuitable and unsatisfactory housing before gaining access to social housing. In the last year, Medway Council had almost 2,000 households present under homelessness legislation and there are currently over 450 homeless households in temporary accommodation. If Medway is to achieve the 2040 vision that *"All sectors and ages of the community can find decent places to live"*, then it needs development at this scale.

We would support the search for potential sources of land supply to include urban regeneration, suburban growth, rural development and the green belt (where appropriate).

In terms of urban regeneration, ambitions should not just be limited to riverside sites. There are several older neighbourhoods with pre 1919 housing that will never be able to be retrofitted to future energy performance requirements at feasible cost. There is also considerable scope for greater town centre living and higher density tall buildings.

Urban town centre living should not be constrained by levels of car parking. There are plenty of urban examples across the UK where successful development has taken place with either nil or very limited car parking. We would encourage Medway Council to be bolder in their approach to car ownership and parking provision on new developments. Much emphasis is given within the Spatial Strategy on the limitation provided by road network capacity and the impact of the Lower Thames Crossing. However, if the 2040 vision is to be achieved then it is essential the new developments reflect the need for less reliance on cars and more sustainable urban living with greater use of public transport, cycling and car sharing.



mhs homes Limited is contracted by Heart of Medway Housing Association Limited to deliver landlord services. If you're a Heart of Medway Housing Association Limited customer please be informed that correspondence to you is sent from mhs homes Limited in its capacity as a managing agent for Heart of Medway Housing Association Limited.



Our ultimate ambition is to
help end the housing crisis
in north Kent

In suburban expansion, the concept of the '15-minute neighbourhood' is one which should be explored, providing sufficient infrastructure and access to employment and services is available.

The potential for increased development in rural areas such as the Hoo Peninsula is noted. However, this ambition must be balanced against the unique and natural environment of the Peninsula and the needed for significant infrastructure improvements. For example, many social housing tenants do not own a car, and this makes the siting of new affordable housing in the more remote parts of the Peninsula difficult unless public transport is improved.

We do hope that these comments are helpful and look forward to the publication of the draft Plan. In the meantime, if you have any queries regarding this submission, please do not hesitate to contact me.

Yours sincerely



mhs homes Limited is contracted by Heart of Medway Housing Association Limited to deliver landlord services. If you're a Heart of Medway Housing Association Limited customer please be informed that correspondence to you is sent from mhs homes Limited in its capacity as a managing agent for Heart of Medway Housing Association Limited.



mhs homes Limited **10704997**
Registered Charity **1177565**
Registered in England and Wales



Medway Council Local Plan 2040

Regulation 18 Consultation- Setting the Direction for Medway

October 2023



[gladman.co.uk](https://www.gladman.co.uk)



01260 288888

Page intentionally left blank

CONTENTS

1	Introduction.....	2
1.1	Context.....	2
2	Setting the Direction for Medway	3
2.1	Plan Period.....	3
2.2	Housing Requirement.....	3
2.3	The Spatial Strategy.....	4
2.4	Other Strategic Matters.....	6
3	Site Submission Profiles.....	8
3.2	Land off Chattenden Lane, Chattenden	8
3.3	Land off Ratcliffe Highway, Hoo St. Werburgh.....	10
3.4	Land at Dux Court Road, Hoo St. Werburgh	12
4	Conclusions	13
4.1	Summary.....	13

1 INTRODUCTION

1.1 Context

- 1.1.1 I am writing on behalf of Gladman Developments to provide our comments on the Medway Local Plan Regulation 18 consultation. Gladman appreciate the opportunity to comment on the most recent regulation 18 consultation and request to be kept updated as the Local Plan progresses.
- 1.1.2 As you are aware, Gladman are promoting three sites in Medway: Land off Dux Court Road, Hoo St. Werburgh; land off Ratcliffe Highway, Hoo St. Werburgh; and land north of Chattenden. Full site submissions are appended to this letter. Should the Council wish to discuss the sites in the context of the emerging Local Plan, we would welcome the opportunity to work collaboratively with the Council to determine how the sites could help deliver the Local Plan's aspirations.
- 1.1.3 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the Local Plan preparation process, having made representations on numerous planning documents throughout the UK, alongside participating in many Local Plan and Neighbourhood Plan examinations. It is based on this experience that this representation is made.
- 1.1.4 The following sections respond to some key issues for the Local Plan that Gladman consider should be addressed to ensure that the policies are robust, and the plan is sound.

2 SETTING THE DIRECTION FOR MEDWAY

2.1 Plan Period

- 2.1.1 Gladman note that the current LDS intends for the Local Plan to be adopted by 2025. Whilst Gladman support the optimistic timeframes, the plan period should be amended to ensure that it remains in alignment with paragraph 22 of the NPPF. To protect against any slip in the LDS, the plan period should run until 2041 or 2042 to ensure that it has 15 years from adoption on a realistic plan making timescale.

2.2 Housing Requirement

- 2.2.1 Paragraph 5.12 determines that the housing need for Medway over the plan period 2022-2040 is for 28,339 based on the Standard Method requirement of 1,667 dwellings per annum. However, an annual requirement of 1,667 across the plan period as drafted (18 years) would equate to 30,006.
- 2.2.2 The document also notes that Gravesham Brough Council have requested Medway assist in the delivery of 2,000 homes and in order to safeguard the delivery of housing, Gladman suggest that a sufficient buffer be included in the housing supply. It is unclear what level of buffer the Council intend to provide, simply stating that '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.' This, at best, is a buffer of 661 homes, a mere 2.3% of the 17 year housing requirement. Whilst there is no rule about what the buffer should be, Gladman in this instance consider a 5% buffer between the housing requirement and supply to safeguard the delivery of housing to be suitable.
- 2.2.3 Gladman also consider that the windfall buffer detailed in Figure 2 is excessive. Though windfall delivery in the authority has previously been high by virtue of appeals being won in the context of an out-of-date local plan and housing land supply issues, this will be vastly different upon adoption of the Local Plan. With an up to date plan and a sufficient housing land supply, this level of windfall delivery is unlikely to be maintained and will typically only reflect small schemes that come

forward within settlement boundaries or as amendments to currently approved schemes.

- 2.2.4 Therefore, to conclude on the housing requirement, Gladman consider that the housing requirement should be 1,667 per annum between 2020-2041/2, with a 15% buffer and an additional 2,000 homes to support housing delivery in Gravesham. Gladman also wish to seek clarification as to whether Medway Housing and Demographics Report 2021 is intended to form part of the Evidence Base. It is currently not included within it on the website; rather the document is downloaded from a more general 'Planning Policy Downloads' section.

2.3 The Spatial Strategy

- 2.3.1 Gladman welcome the recognition that development in rural areas could have capacity for 14,736 homes. Much of the countryside within Medway is on the Hoo Peninsular and the Council note that the vast majority of sites that have been put forward for potential development beyond the Green Belt are in this location. In general, Gladman support the identification of the Hoo Peninsular as a key location for growth.
- 2.3.2 There is significant potential for the delivery of homes on Hoo. The draft Hoo Development Framework was published for consultation in 2022, and whilst the Housing Infrastructure Fund (HIF) is now absent, the Council must consider how development in this location can be delivered. This will require extensive collaboration and exploration with key stakeholders to ensure that a future growth strategy that directs growth to this location is robust and deliverable.
- 2.3.3 Despite the absence of HIF, there are significant levels of growth that can be delivered on Hoo, including necessary infrastructure and Gladman supports the acknowledgement of the potential for large scale growth on the Hoo peninsula in paragraph 5.40. The Hoo peninsula affords Medway the opportunity for holistic development that can offer a critical mass of development to ensure the plans laudable 'sustainable and green future objective' is achieved. Sustainable

development on the peninsular has the potential to deliver a range of social, economic, and environmental benefits.

2.3.4 The social benefits arising from residential development are significant; high quality, eco-friendly homes to contribute to the housing needs of the authority and much needed affordable homes. It is well documented that affordable housing is more likely to be delivered on greenfield sites with fewer viability concerns than traditionally experienced on brownfield sites. The urban regeneration strategy may present a range of viability issues typically associated with the complexities of redevelopment that could reduce the level of affordable housing delivered by the schemes. Development on Hoo could ensure the delivery of affordable homes and make a substantial contribution to the affordable housing need of the authority. It is also important to recognise that residential development on Hoo will be delivered beyond the Green Belt, reducing the need to release Green Belt from other areas through the demonstration of exceptional circumstances.

2.3.5 New housing can also deliver upgrades in terms of social infrastructure, provide a new, expansive area of community parkland, employment space, retail facilities, primary and secondary schools, and healthcare facilities. Comprehensive development can provide new and enhanced leisure and recreation facilities for existing Hoo residents can provide betterment to quality of life on Hoo. New highways infrastructure and road network improvements are a significant benefit of comprehensive development on Hoo, more detail on which is provided later in this response.

2.3.6 Residential development will also enhance and support the local economy of Hoo by supporting the large scale employment sites at Grain and Kingsnorth. Given that these locations are providing a significant level of economic growth, it is imperative that the workforce expected to be employed at these locations have access to suitable and sustainable homes. The new and existing residents will also make significant contributions to the economy, supporting local shops and services to ensure their continued viability and vitality.

- 2.3.7 Well designed, landscape and climate conscious development will ensure that growth on Hoo can be achieved without significant harm to the environment, and numerous ecological and environmental enhancements can be achieved. New areas of open space, comprehensive landscaping plans, eco-friendly homes and bio-diversity net gain can all be readily achieved on Hoo.
- 2.3.8 Growth in this location could also increase the sustainable travel options in the area, including contributions and support for local services such as a high-quality, high-frequency bus service to support sustainable modes of travel. The delivery of upgrades to service infrastructure such as high-speed broadband and 4G will in turn support businesses and residents in facilitating home-working and reducing commuting. Combined with the delivery of a new local retail centre and improvements to local services, the reliance on the private car could be greatly reduced.
- 2.3.9 Fundamentally, the Council must recognise that the HIF was a growth accelerator that would have delivered the necessary infrastructure, but its absence does not mean that no growth can occur on Hoo. Gladman consider that there is significant levels of growth and associated infrastructure that can be brought forward despite the absence of HIF through comprehensive and well-designed development.
- 2.3.10 Gladman look forward to working collaboratively with Medway to explore the options for the funding and delivery of infrastructure that can support growth on Hoo and bring forward the significant benefits detailed above.

2.4 Other Strategic Matters

- 2.4.1 Gladman consider that Council must properly assess the highways capacity of the district through modelling, modal shift and discussions with site promoters and key stakeholders to find solutions to these constraints which can be funded through Medway wide developer levies.
- 2.4.2 The document makes reference to the Lower Thames Crossing at several points, as well as the issues currently experienced at M2 Junction 1. It is understood that the

Lower Thames Crossing, as proposed, could exacerbate the issues at J1 and pose a significant roadblock to development on the Hoo Peninsular. However, the Council should be mindful of the significant delays and upcoming review of the Lower Thames Crossing and note that it is not guaranteed to come forward.

3 SITE SUBMISSION PROFILES

3.1.1 Gladman are promoting three sites in Medway, all suitably and sustainably located on the Hoo Peninsular. These have previously been submitted through the Call for Sites process, and Gladman have discussed these sites directly with the Council previously, however, should you wish to discuss these sites further please do not hesitate to contact us.

3.2 Land off Chattenden Lane, Chattenden

3.2.1 Land of Chattenden Lane, Chattenden is 35.16 acres and is capable of delivering up to 530 homes alongside land for a primary school, a retail unit, public house, public open space and green infrastructure and sustainable drainage systems. The site is adjacent to the existing residential development of Chattenden, to the west of Peninsular Way, south of Deansgate Ridge Golf Course and the decommissioned Chattenden Barracks. The settlement lies approximately 4km to the north of Chatham, and 3km south east of Cliffe Woods. A site location plan is shown in Figure 1 below.



Figure 1: Site Location Plan, Chattenden Road

-
- 3.2.2 The site is a suitable and sustainable location for growth, adjacent to the existing urban area of Chattenden and could also deliver a number of benefits. These include but are not limited to investment in the local community, a significant boost to the supply of much needed market and affordable homes, and new social infrastructure such as land for a school and community uses.
- 3.2.3 The site itself is suitable for development, being well located to existing built form with good access to local services and facilities. The site is well contained within the landscape and other landscape features can be retained and enhanced. Development at this location will not result in an unacceptable impact on highway safety, nor have a severe impact on the operation of the highway network in terms of capacity. No significant impacts on ecological habitats will arise from the development and the site is within Flood Zone 1, at the lowest risk of flooding. There are no designated heritage assets within or immediately adjacent to the site and development at this location would not affect the setting of any locally listed buildings.

3.3 Land off Ratcliffe Highway, Hoo St. Werburgh

- 3.3.1 The site measures circa 12 hectares and is capable of delivering up to 240 homes. It is located adjacent to the existing residential development on the western edge of Hoo St. Werburgh, bound by Ratcliffe Highway to the north and is in an ideal location on the Hoo Peninsular. A site location plan is shown below in Figure 2.



Figure 2: Site Location Plan, Ratcliffe Highway

- 3.3.2 The site itself is a suitable and sustainable location for development. The site is not subject to any statutory national, or international designations for landscape or nature conservation. A wide range of services and facilities within close proximity to the site include, but are not limited to a primary school, secondary school, sports and leisure facilities, a library, post office, pharmacy, health centre and various eateries. The site is also served by public transport facilities, offering an alternative to the private car. A comprehensive Green Infrastructure framework, public open space and new areas for recreation and play can also be delivered by the site, alongside a sustainable drainage system to cater for the surface water drainage requirements of

the development. These areas will also support ecological enhancement and be design features that benefit biodiversity on site. An Indicative Framework Plan is displayed below.



Figure 3: Indicative Framework Plan, Ratcliffe Highways

3.4 Land at Dux Court Road, Hoo St. Werburgh

3.4.1 Land at Dux Court Road measures circa 23 hectares and is a suitable and sustainable location for development. A site location plan is included at Figure 3.

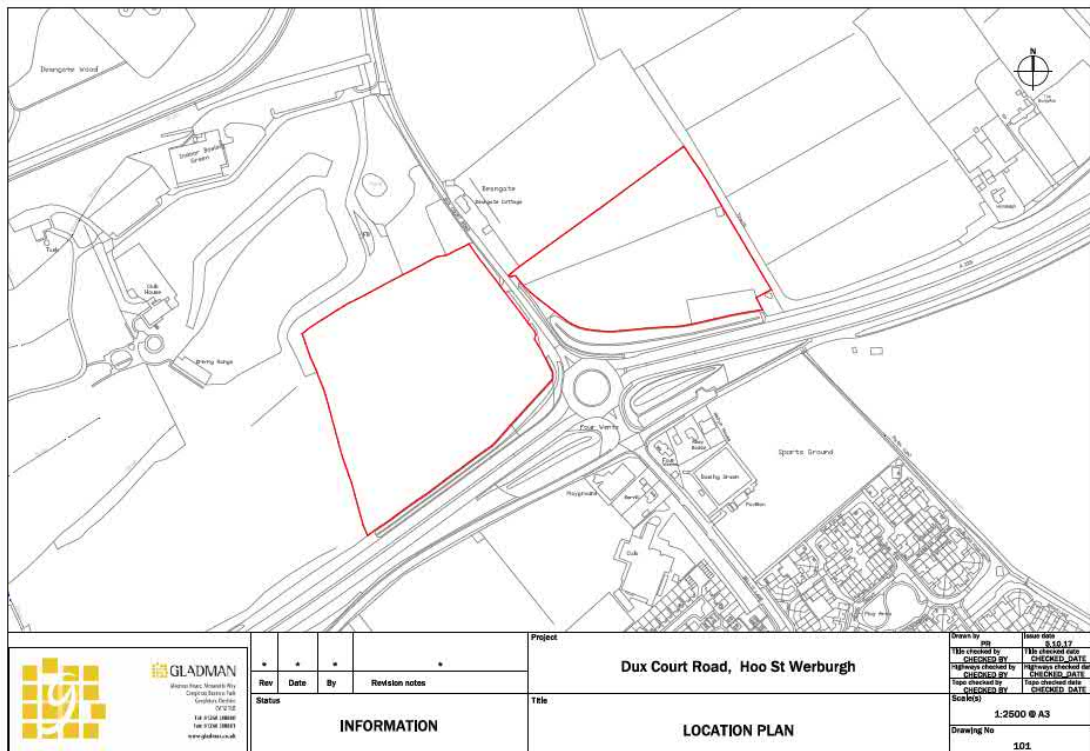


Figure 4: Site Location Plan, Dux Court Road

3.4.2 The site is suitably located near a range of services and facilities, including a primary school, secondary school, medical centre, pharmacy, shops and a post office. There are public transport services available within the vicinity of the site, offering a suitable alternative to the private car. The site is located within Flood Zone 1 and there are no known ecological or heritage constraints to development at this location.

4 CONCLUSIONS

4.1 Summary

- 4.1.1** Gladman welcomes the opportunity to comment on the issues and options that are currently being explored by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.
- 4.1.2** Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 4.1.3** We hope you have found these representations informative and useful towards the preparation of the Medway Local Plan.
- 4.1.4** Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at policy@gladman.co.uk.



headley, andrew

From: Ann Martin [REDACTED]
Sent: 21 October 2023 19:03
To: futuremedway
Subject: Future development

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Reg 18 email Responses

I see Allhallows & Grain are earmarked for incremental development there is very little provision for the infrastructure to support extra development

This will set the area up for social issues in the future how are you going to address this should the development go ahead?

Also will there be provision for social housing

Ann Martin
Sent from my iPhone

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



Contents

1.	Introduction	1
2.	The Site	3
3.	The Proposals	6
4.	Comments on Regulation 18 Local Plan	8
5.	Conclusion	18

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



1. Introduction

- 1.1. Savills have been instructed by Catesby Strategic Land (Catesby) 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 the Land South of Lower Rainham Road (herein referred to as 'the Site'), which lies to the east of Gillingham between the areas known locally as Grange, Lower Rainham and Lower Twydall. The Site was re-submitted to Medway Council as part of the Call for Sites exercise between November 2022 and February 2023. The Site was subsequently identified under reference RN5 by the Council as set out in the Land Availability Assessment (LAA) supporting this Regulation 18 consultation.
- 1.3. These representations are to respond to the Regulation 18 document and the growth options, as well as to explain why the Site is suitable for a residential led, mixed-use development in isolation or together with surrounding sites. The proposal would provide approximately 400 new dwellings which would be set within three distinctive new hamlets / clusters, a policy compliant percentage of which would be affordable housing, and the creation of a new community hub containing a new 1 form entry (1FE) primary school site, community rooms and local retail. The proposal also includes extensive multi-functional open space, landscape and biodiversity network and the provision of a new country park with the creation of new linked footpath and leisure routes through the development. Further details of the proposal are set out in section 3 of these representations.
- 1.4. The following documents are submitted with these representations:
 - Vision Framework Rev. H;
 - Landscape, Visual and Design Summary Note (October 2023); and
 - Transport Note and Accessibility (October 2023).
- 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 observations made within these representations are to support Medway Council in preparing a sound plan.

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



1.7. As part of the Draft Local Plan consultation, Medway has published two documents in which observations have been made within 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**

2. The Site

- 2.1. The Site comprises four irregular-shaped, linked parcels of land to the east of Gillingham between the areas known locally as Grange, Lower Rainham and Lower Twydall. Together the parcels comprise 30.21 hectares of greenfield land in mostly arable use. The Site Location Plan can be seen in Figure 1.
- 2.2. The Site is located to the south of the Lower Rainham Road where it adjoins Lower Twydall Lane. The western boundary of the Site is a field boundary just west of Eastcourt Lane. The east of the Site is bordered by open fields separated by hedgerows, and to the south east of the Site by an open field, also separated by hedgerows. There is also existing development along Lower Rainham Road and abutting the Site on Lower Twydall Lane.
- 2.3. A historic and remediated chalk pit is located within the eastern cluster of fields, the extents of which are defined by the mature tree and hedgerow lines.
- 2.4. It is noted that the Site has a gradual incline in ground level from Lower Rainham Road along the southern boundary. The remediation of the chalk pit has created a man made localised high point at around 25m.
- 2.5. The entirety of the Site is located within an Area of Local Landscape Importance as indicated on Map 4 of the adopted Local Plan policy maps. A designation, denoting the Boundary of Tidal Flood Area, is contained to the north of Lower Rainham Road and as such the entirety of the site is located within Flood Zone 1 (representing the lowest risk of fluvial flooding). The Riverside Country Park is located immediately to the north of Lower Rainham Road.
- 2.6. The south of the Site is also immediately adjacent (but not within) the Lower Twydall Conservation Area. There are no listed buildings within the boundary of the Site, however there are a number of listed buildings that are located in close proximity to the Site. The majority of these comprise buildings within the Lower Twydall Conservation Area. These buildings are not positioned in such a way that would constrain the future development potential of the Site.
- 2.7. No other policy designations impact upon this site, and it is therefore relatively unconstrained. The accompanying landscape and heritage note provides greater detail and analysis of the landscape character and quality

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



Figure 1: Site Boundary



Neighbouring relevant planning application

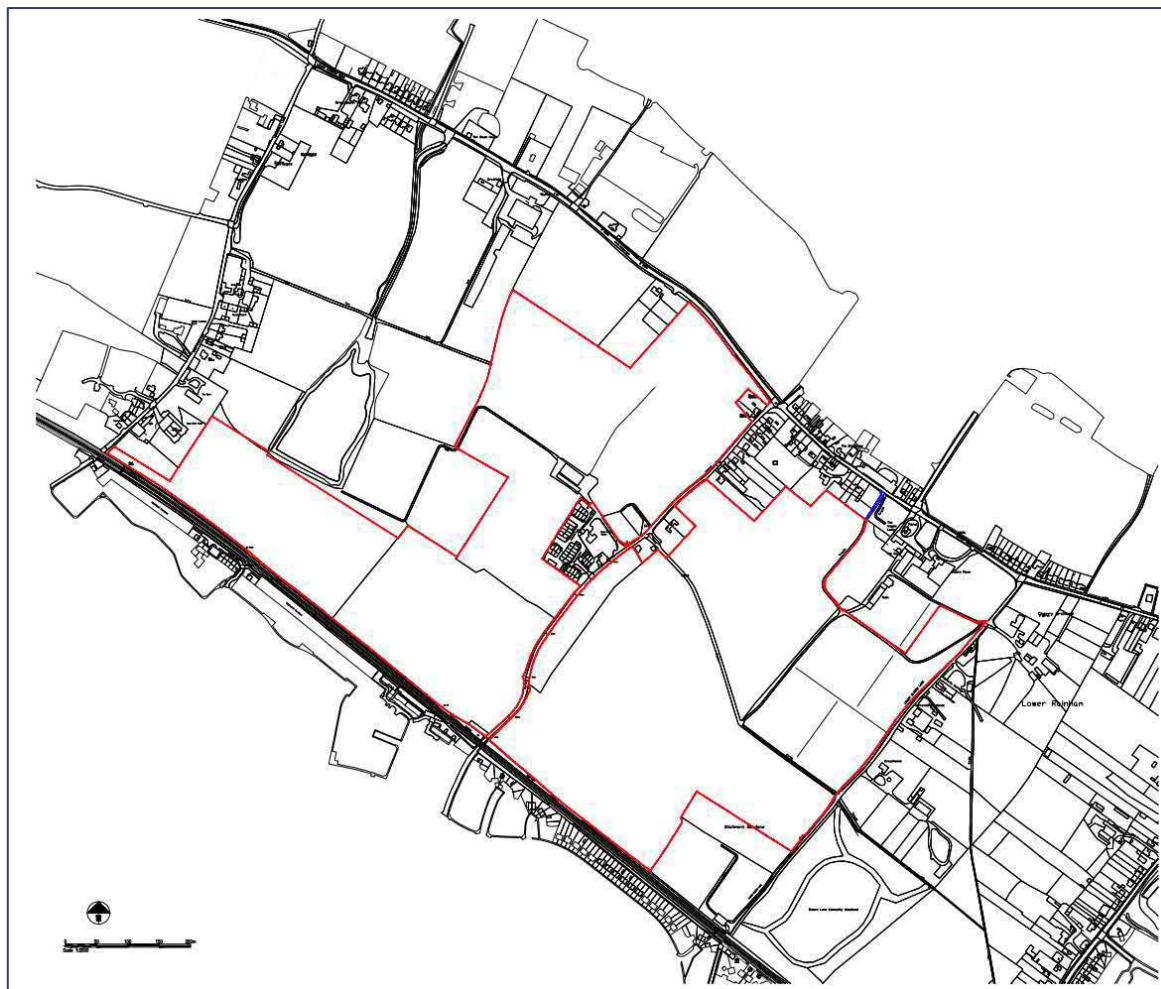
- 2.8. An application (reference: MC/19/1566) for approximately 1,250 dwellings and supporting community infrastructure was submitted on the land to the south east of the promotion Site (application site known as “Land Off Pump Lane Rainham”). The location of this proposal can be seen in Figure 2. The application was refused on June 2020 and the subsequent appeal was dismissed by the Planning Inspectorate in November 2021 on the basis of landscape and visual impact and cumulative highways impacts.
- 2.9. Catesby has carefully reviewed this application and through this representation will outline why development in this area would be a suitable growth option for the Council to take forward through the plan making process.

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



Figure 2 – Site location plan of adjoining Land off Pump Lane, Rainham



3. The Proposals

- 3.1. The proposals seek to provide a new residential-led development with supporting community infrastructure. It has the ability to come forward in isolation or as part of a wider allocation within the surrounding suburban expansion area identified in Map 2 of the Regulation 18 Consultation Draft Local Plan. The following sub-headings outline some of the potential benefits of the proposal.

New homes

- 3.2. The proposals would accommodate approximately 400 new homes with a mix of sizes and types. The housing would be set within three distinctive clusters reflecting the morphology and landscape characteristics of the surrounding area.
- 3.3. A policy compliant level of affordable housing in a mix of sizes and tenures will be provided as part of the proposal. The proposals will also respond to the requirement to provide 5% of the dwellings as self-build housing. All homes will meet the required accessibility and space standards in accordance with the latest policy and building regulation requirements.

A new community hub including a new primary school

- 3.4. A new 1 form entry primary school site is proposed as part of the proposal, as there was an identified need for this in the area. This would be within the community hub with community rooms and local retail, alongside a network of community growing and environmental educational features. Formal engagement with the Council and the local community would refine the specific use this would entail. Potential options include home working hubs, community café or a shop.

Open space and landscaping

- 3.5. Sustainable routes to existing services and facilities would be provided with the enhancement of pedestrian and cycle links across the railway line to Twydall and Rainham. There would also be a new network of community development and environmental educational spaces.
- 3.6. A large multi-functional open space, landscape and biodiversity network is also proposed in the Site, which would provide new, diverse landscape planting and enhanced ecological habitats. A new section of country park would also be provided through which a system of pedestrian routes would connect and link to the three hamlets. This would be connected to the Riverside Country Park which would help disperse visitor pressure and offer existing and new residents greater variety in their walking routes.

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



- 3.7. The proposals include a commensurate buffer to the Lower Twydall Conservation area, whilst sensitively delivering much needed new homes in a sustainable location.

Planning History

- 3.8. This Site has been promoted within the call for sites exercise which was conducted by Medway Council between November 2022 and February 2023. This call for sites exercise has then informed the Land Availability Assessment (LAA) which forms part of the evidence base of the Regulation 18 Local Plan. The Site was assessed under reference RN5 of the call for sites and is to proceed to Stage 2 of the Land Availability Assessment. The conclusions reached in LAA are reviewed in the next chapter of these representations.
- 3.9. The Site was also promoted through the previous iteration of this emerging Local Plan. Representations were submitted to the Medway Council Development Options Consultation on the Emerging Medway Local Plan “Future Medway” which closed on 18/04/2017.

4. Comments on Regulation 18 Local Plan

- 4.1. It is noted that the Regulation 18 Local Plan comprises a high-level spatial plan for Medway's growth, and aims to stimulate feedback from local people, business, community and interest groups and wider organisations on the direction and content of the new Local Plan. The Regulation 18 Local Plan has been published for consultation after Medway Council decided to revert back to the Regulation 18 stage of the Local Plan preparation in August 2022.
- 4.2. It is noted that the consultation does not detail policies or identify those sites preferred by the Council for future development, and instead requests comment on the Land Availability Assessment, four Strategic Objectives, and potential Spatial Strategies. These representations comment on these where relevant to this Site.

Land Availability Assessment (LAA)

- 4.3. 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.
- 4.4. It is noted that the LAA does not comment on the suitability of the sites at this stage, however it does outline the availability of sites in the Medway area.
- 4.5. It is noted that the Site, was submitted to the call for sites and is registered under Site ID RN5. The technical information submitted on the Site can be found in the LAA files. Since the Council has not yet commented on the Site, Catesby has no comment, other than noting that the Site is readily available for development early in the plan period and Catesby has a promotion agreement with the landowners to bring the site forward for development.

Strategic Objectives Set Out in the Consultation Document

- 4.6. Medway Council sets out four strategic objectives to plan positively for the development and infrastructure that the area needs, whilst also conserving and enhancing the natural, built and historic environment. The four strategic objectives are outlined before, with how the Site can meet these aims. 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

- 4.7. 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'. The Landscape, Visual and Design summary note which has been produced by

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



Stantec (October 2023) supports these representations and states how the proposal will help meet this objective.

- 4.8. In relation to the Site, it is considered that there are several ways in which the proposals can assist the Council to achieve this objective. Catesby would provide a comprehensive transport package which focuses on reducing private car travel. This would include smart travel initiatives to encourage walking and cycling as well as significantly improved bus provision which will be beneficial to both new and existing residents
- 4.9. The Site is located in Flood Zone 1 according to the Environment Agency Flood Risk Map, which means that there is low risk of flooding from rivers, sea or reservoirs. A small area of existing surface water flooding is evident in the western-most field according to surface water maps, however this can be readily addressed as part of the wider development layout, and sustainable drainage features will be included to attenuate surface water run-off. The ultimate outfalls will be into the Lower Rainham Road to connect to the headwall to the north and into the river Medway.
- 4.10. 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. The Site is located in a sustainable location within easy access of a significant and wide range of facilities and services in and around Gillingham and Rainham. This includes railway stations, supermarket, healthcare, educational, recreation and community facilities. The sustainable location of the Site would mean that future residents would not need to travel far to access places in which people are able to meet most of their daily needs. Furthermore, the Site will also promote walking and cycling within it, and to the surrounding area which is in line with the green infrastructure elements of the Regulation 18 document.
- 4.11. The promoted Site is located in close proximity to a range of Public Rights of Way and National Cycle Network (NCN1) routes. There is also capacity for road cycling for more proficient cyclists on Lower Rainham Road which is a 40mph carriageway. The proposal would also provide opportunities to provide enhance cycle links north to connect with the NCN1 cycle route.
- 4.12. The proposals would also permit connectivity to Twydall via the existing footbridge which leads off Lower Twydall Lane over the rail line to the south of the Site. The bridge has shallow steps which would support use by pedestrians, cyclists and ambulant disabled. Non-stepped crossing points are also available off Pump Lane and Eastcourt Lane. As part of any development there is the potential to further enhance the attractiveness of these crossing points, which would therefore provide safe and effective choices for sustainable travel which would meet this strategic objective. As such, it is considered that the proposal would contribute to Medway's goals of achieving sustainable development.

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



Strategic Objective 2 - Supporting people to lead healthy lives and strengthening our communities

- 4.13. The second objective relates to the provision of high quality, energy efficient homes that meet the housing needs of Medway's communities. The Site aims to provide a policy compliant level of affordable housing, however the proportion of affordable homes required has not yet been outlined at this stage, due to the high-level nature of the Regulation 18 document.
- 4.14. It is considered that the improved green infrastructure element set out in this objective, is intrinsically linked with elements of Objective 1 which set out the benefits of improved opportunities for walking and cycling and enhanced public transport services. Catesby is supportive of this objective, and acknowledges the mutually beneficial role of improving green infrastructure, for both the environment, and the people of Medway.
- 4.15. The ability to access and enjoy nature close to home is proven to help increase health and wellbeing for communities, especially since the Covid pandemic as people increasingly value outdoor spaces. In addition to the green infrastructure benefits provided, a number of community benefits will be delivered through the proposals, including opportunities for an extended wooded area, the addition of a new section of Country Park, the delivery of a range of new children's play areas and an area for community allotments. The location of these can be seen in Figures 2 and 3 which have been extracted from the vision document. This would support the Government's ambitious new Environmental Improvement Plan for England (January 2023)¹ which sets a target for every household in England to be within 15 minutes of greenspace or water.

Figure 2 – Delivering Three District Clusters/ Hamlets and Figure 3 – A New Productive and Active Landscape Linking the Hamlets/ Clusters



- 4.16. In 2020, the government adviser for the natural environment, Natural England, found *"that people who live in neighbourhoods with greater amounts of green infrastructure tend to be happier, healthier and live longer"*

¹ <https://deframedia.blog.gov.uk/2023/02/03/environmental-improvement-plan-outlines-ambition-to-create-greener-and-cleaner-country/>

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



lives than those who live in less green places". Therefore, the green space provided within the proposed Riverside Country Park to the north of the Site would be valuable to this part of Medway, contributing to a greener, healthier and happier Medway. As such there would be significant ecological and social benefits as a result of the green infrastructure.

- 4.17. It is noted that at the time of writing, Medway Council is currently undertaking an Open Space Study, however the results from this study have not yet been published. Once available, the proposed open space can be reviewed to ensure it provides the right typologies to meet any identified shortfalls.
- 4.18. Other community benefits provided on the Site include the addition of a community hub containing a new 1FE primary school as shown in Figure 2. This will contribute to the final point of this objective, which states that there is an aim to strengthen the role of Medway's urban, neighbourhood and village centres. The Site would therefore contribute to achieving the environmental, social and economic goals of this objective.

Strategic Objective 3 - Securing jobs and developing skills for a competitive economy

- 4.19. Strategic Objective 3 is with regards to employment in Medway Council. Specific reference is made to preventing out-commuting of residents.
- 4.20. It outlines the objective to increase capacity for learning and its student base. Whilst the objective does not specify what the "key sectors" are which are to be raised in profile (paragraph 2), the Site would allow for the provision of a Community Hub, which would provide essential jobs, in addition to the employment provided by the new primary school. The site is well located to access key areas of employment in Gillingham and Chatham which in turn support their continued economic growth. It is essential that adequate homes are delivered alongside economic development to ensure that the vitality of those businesses and makes Medway an attractive place to live and work. The Site is well located to access key areas of employment in Gillingham and Chatham which in turn support their continued economic growth.
- 4.21. The increased accessibility and movement to the Site would also allow travel to other educational establishments locally including St Augustine School, Byron Primary School, Mid Kent College and the Universities at Medway. The Site would therefore facilitate and encourage living and working in Medway.

Strategic Objective 4 - Boost pride in Medway through quality and resilient development

- 4.22. The fourth strategic objective is with regard to boosting pride in Medway through good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served.
- 4.23. The proposal will help to meet the objectives of sustainable development as outlined in the Regulation 18 objectives. The Site is well located within close proximity of a significant and wide range of facilities and services in and around Gillingham. This includes railway stations; national supermarket chains; healthcare providers; education facilities; recreation; and community uses. Furthermore, Catesby are cognisant of the wider development opportunities in this local area, which combined with this site could unlock significant sustainable growth.

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



Developing a Spatial Strategy

Development Needs

- 4.24. Catesby agrees that a Local Plan should be positively prepared for sustainable development which does not inhibit development for our growing and changing communities. Catesby supports the Council's growth ambitions and advocates an unconstrained and holistic view of development across Medway.
- 4.25. The Regulation 18 document acknowledges that the 'Standard Method' set out by central government to determine the new housing required over the plan period would result in a level of housing growth 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.
- 4.26. Medway Council (along with several other LPAs) has raised concerns in government consultations about the Standard Method, 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 guidance is clear that local planning authorities must proceed with plan making on the basis of the published NPPF and associated planning guidance.
- 4.27. Therefore it is considered contradictory, given the Council's own economic sustainability objectives, to immediately limit housing needs based on past trends. Whilst Catesby recognises the concerns of the Council regarding existing infrastructure and future capabilities, the preparation of the Local Plan is the appropriate method of addressing these issues. It is vital therefore that the new Local Plan allows for the correct level of development, and in particular housing, so the correct level of supporting infrastructure can be planned alongside.

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



- 4.28. Paragraph 5.12 of the Regulation 18 document states the housing needs for Medway over the plan period of 2022-2040 is to be 28,339. Paragraphs 5.3 and 5.11 subsequently note the need to be 28,500. Furthermore, paragraph 5.3 also refers to the need as 1,667 homes a year, which when taken across the 18 year plan period (2022-2040), results in a total need of 30,006 homes. With three different figures in the proposed Local Plan, it is imperative the Council are clear on the housing needs of Medway and appropriate justification if it has applied any reductions to the standard method figure. Notably however, a buffer will need to be applied to the correct figure as the Council confirms at paragraph 5.12. In addition Gravesham's unmet need will also need to be accounted for. Catesby therefore considers that the plan period need for Medway will be closer to 34,000 homes (1,888 dpa).
- 4.29. Furthermore, The Council outlines in paragraph 5.12 that providing for the buffer to allow for the fact that not all sites identified in the plan will be delivered as expected. Catesby agree with this and recommend that the local plan includes a buffer of at least 15% surplus in land supply over the housing requirement to ensure that the planned level of housing growth is deliverable over the period.
- 4.30. At Figure 2 of the Local Plan period the Council sets out how many sites are considered to be in the pipeline (with planning permission), those it expects to come forward as windfall sites and thus the remainder it will need to allocate within the LP2040 in order to meet its needs.
- 4.31. Regarding pipeline sites, Catesby notes this figure to be 7,583, which is 27% of the need across the plan period (using the Council's figure of 28,500). This is considered significant and the Council should assess these sites to ensure they are deliverable before relying on them in a new Plan. Any planning permissions which have lapsed should indicate that a Site is not coming forward in the short term.
- 4.32. Regarding windfall sites, Catesby notes this figure to be 3,000, which is 10.5% of the need across the plan period (using the Council's figure of 28,500). The National Planning Policy Framework 2023 (NPPF) is clear that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply (Paragraph 71). Catesby therefore requests that the Council provide robust evidence that demonstrates 3,000 homes are capable of being delivered via windfall sites across the plan period.
- 4.33. Regarding the number of homes needing to be allocated within the Local Plan period, it is noted that this is likely to rise following the correct calculation of need across the plan period. Nevertheless, Catesby suggests the Council should consider allocating more sites within the Regulation 18 Document in order to require less unplanned development to meet its needs across the plan period.
- 4.34. Paragraph 5.15 of the Regulation 18 Document notes that the Land Availability Assessment (LAA) has revealed land with a potential capacity for circa 38,200. Catesby suggests that sites contained within the LAA are therefore assessed robustly and objectively to enable the Council to plan and allocate sites for the majority of its housing need.

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



- 4.35. Whilst it is noted that the Hoo Peninsula can accommodate some new development, it is a notable constraint that HIF funding is under review, and the Council comments at paragraph 5.45 that the capacity of infrastructure to support major growth on the Hoo Peninsula is a strategic consideration. Indeed, Catesby considers that such growth may take the majority of the plan period to come to fruition, as seen elsewhere in the country with strategic development locations. Consequently, this scale of development will need to be complemented by development on the edge of existing communities, that helps achieve the desired prosperity of the region and maintains an annual supply of homes.
- 4.36. The key to soundness of the plan is that the Council must ensure that it meets its identified housing needs in full, as required by national policy. Should the Council not be able to meet needs within the Borough then it must set out where those unmet needs will be provided. In taking forward this plan it will also be essential that the Council identifies whether or not any of its neighbouring authorities will be unable to meet their development needs. If they cannot meet needs the Council must consider whether they will be able to support those authorities in delivering more housing to address these unmet needs. It is important to remember that it is for Local Planning Authorities to work collaboratively, and to act strategically, in order to meet development needs. The Council should therefore seek to prepare statements of common ground with its neighbouring authorities to establish a shared position on housing needs and how these needs will be met. In particular, Gravesham have indicated that they may be unable to meet their own needs, and therefore will rely on Medway and other neighbouring LPAs in Kent to meet this deficiency. During the withdrawn Regulation 18 Local Plan, Gravesham Borough Council requested that Medway consider helping it to meet its unmet housing needs, for up to 2,000 homes. In Medway's previous Regulation 18 document, the Council did not consider that it would be able to demonstrate sufficient additional capacity to meet an increased need. Sufficient sites should be provided in the Local Plan to accommodate this additional need.
- 4.37. Catesby suggests that Medway Council seeks to prepare a plan using the Standard Method as per NPPF paragraph 61 and so that it seeks to boost housing and make efficient use of land. Such an approach would ensure that with regard to the key stumbling block of housing need, the plan would be considered sound. Furthermore, whilst The Standard Method and the requirement for the local housing need assessment (Paragraph 61 of the NPPF) could be omitted from any updated future NPPF, it remains current national 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: *"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.
- 4.38. The concept masterplan illustrates that the Site could deliver circa 400 new dwellings which would provide a significant contribution to Medway Council's housing supply. Due to the level of technical work and due diligence they undertake as a leading land promoter, Catesby's sites typically start delivering finished dwellings from around 20 months from the grant of outline planning permission. As such this Site would be capable of delivering housing numbers early on in the plan period.

Draft Medway Local Plan Regulation 18 Consultation

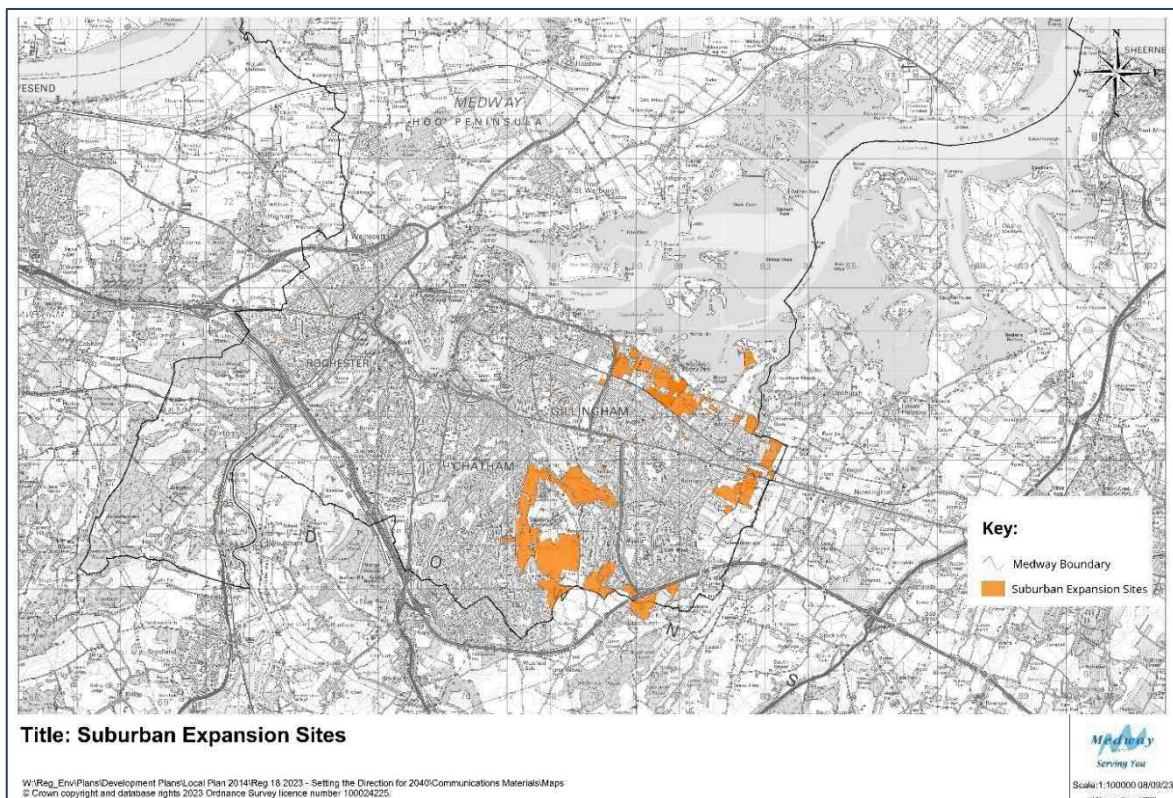
Land South of Lower Rainham Road, Gillingham



Suburban Expansion Area

- 4.39. Medway 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. The Site lies within the potential 'Suburban Expansion' area of the sites, and is highlighted in orange in Figure 4.
- 4.40. Paragraph 5.33 of the Regulation 18 document, states that a constraint for development in the Suburban Expansion area, would be that although the potential sites could be developed in proximity to existing towns and neighbourhoods, there is not sufficient capacity in existing services such as schools. As such, 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.
- 4.41. The proposal put forward as part of these representations addresses these challenges by providing a primary school, and also improving transport links to the area. Development on the greenfield sites in this category, would be able to be built out quickly and in significant quantum, responding to market demand and more limited site constraints than typically found with brownfield sites.

Figure 4 – Suburban Expansion (source: Regulation 18 document)



Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham

The Savills logo, consisting of the word "savills" in a lowercase, sans-serif font, with the 's' in a darker shade than the rest of the letters. It is positioned on a yellow rectangular background.

- 4.42. It is noted that the Site is a largely agricultural landscape which is an important part of the green infrastructure network. However growth in this area could support the concept of the '15-minute neighbourhood,' which is outlined within the Regulation 18 Local Plan. As part of the ongoing promotion of the Site, a 'Landscape, Visual and Design Summary Note' (October 2023) has been produced to assess the suitability of the Site for residential development from a landscape and visual heritage perspective. This has been submitted as part of these Representations.
- 4.43. It is noted that whilst Medway Council describe the area as a largely agricultural landscape, the Medway Landscape Character Assessment (2011) describes this area as a fragmented landscape, comprising a mix of arable land, orchards, grazing and neglected parcels of land. It also acknowledged that there is *"poor condition of some farmland areas, tendency to-wards fragmentation and trend towards urban fringe activities and weakened coherence"*. The Landscape Character Assessment also identifies the opportunity for improved land-uses; improved linkages / public access as well as improving the landscape management generally.
- 4.44. There is the potential to mitigate adverse effects and deliver localised environmental enhancements through a comprehensive landscape strategy. This includes enhanced and new boundary features to aid integration; new productive landscapes – such as orchards and allotments, as well as the provision of new accessible landscapes for amenity and recreation. Therefore the sensitively designed scheme can protect the Council's important environmental assets whilst delivering much needed homes in a high quality and green environment. The attached Landscape, Visual and Design Summary Note (October 2020) provides more information with this regard.
- 4.45. A constraint of the Suburban Expansion is the A2 (an important transport corridor) but experiences congestion and has been designated an Air Quality Management Area. The Regulation 18 document states that there is a risk that major development in these suburban locations would lead to congestion and pollution issues.
- 4.46. Overall, the site has good access to local facilities within the local area of Twydall. The Site is also on the periphery of Medway's cycle network, with a number of routes available within the vicinity of the Site. The Site is therefore considered to be located in a sustainable location and in respect of railway stations provides opportunities to access a wide range of towns without the use of a private car. The attached Transport and Accessibility briefing note provided by Stantec (October 2023) provides further information with this regard.
- 4.47. It is noted that within these five categories, the 'Urban Regeneration' category has the highest potential housing capacity according to the LAA. However, it should be cautioned that there are often significant constraints with Brownfield Sites which can impact on the quantum of delivery and result in viability leading to a reduction of on-site benefits notably including affordable housing.
- 4.48. Catesby supports the proposed growth option "Suburban Expansion". It is acknowledged that the council is likely to require a mix of growth options to deliver a range of housing across Medway. However, the benefits of the suburban expansion should be preferred and taken forward to the next iteration of the emerging Local Plan. The Suburban area, including the land to the north of Gillingham, provides a unique opportunity to

Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham



deliver a sustainable urban extension on generally unconstrained land outside of the Green Belt. This allows for the delivery of new community infrastructure, affordable homes and improvements to the surrounding highways and infrastructure. Given the unconstrained nature of the sites; design, layout and landscape can be at the forefront of the proposals helping to shape a high quality place to meet the needs of future generations. Furthermore, the delivery of housing in the area can be efficient and delivered within the earlier years of the Plan Period.

- 4.49. In light of the foregoing, Medway Council is urged to consider the allocation of land within the Suburban Expansion area and most notably the areas adjoining Lower Rainham Road.

5. Conclusion

- 5.1. These representations have been prepared on behalf of Catesby in relation to the land south of Lower Rainham Road (identified as site RN5 in the Council's LAA).
- 5.2. Throughout this representation the benefits of the proposal are set out. These include:
- The delivery of 400 new homes in a mix of sizes and types set within three new distinctive hamlets/ clusters influenced by the established morphology and landscape characteristics;
 - Policy compliant provision of affordable housing in a mix of sizes and tenures;
 - Potential to accommodate a community hub containing a new 1FE primary school site, community rooms and local retail;
 - Delivery of a range of new children's play areas;
 - Pedestrian cycle links;
 - Extensive multi-functional open space;
 - Delivery of an additional area of country park through which a network of pedestrian routes can pass and link between the three hamlets and existing Riverside Country Park;
 - Creation of new linked footpath and leisure routes and provision of new safe routes to surrounding community and leisure uses; and
 - Catesby is willing to work with adjoining landowners to assist with the delivery of a sustainable suburban expansion on Lower Rainham Road.
- 5.3. Observations on the proposed growth strategies have been provided. Catesby acknowledge that it is likely that the Council will require a mix of the strategies. However, the benefits of delivering housing in the suburban expansion area should be noted and support is provided for growth in this sphere. Developments in the defined suburban area provide the Council with a unique opportunity to deliver sustainable urban extensions with the community and placemaking at the heart of the proposals.
- 5.4. 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 Catesby. The Site would assist Medway Council in achieving this goal and thus its allocation should be supported.
- 5.5. The Site has the capability to link into adjoining land to provide a wider development and new neighbourhood connecting into nearby facilities and services. Catesby is willing to work with adjoining landowners to assist with the delivery of sustainable suburban expansion at Lower Rainham Road.
- 5.6. Savills and Catesby thank 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.





GILLINGHAM KENT

A VISION FOR GROWTH AT
LAND SOUTH OF LOWER
RAINHAM ROAD

Contents

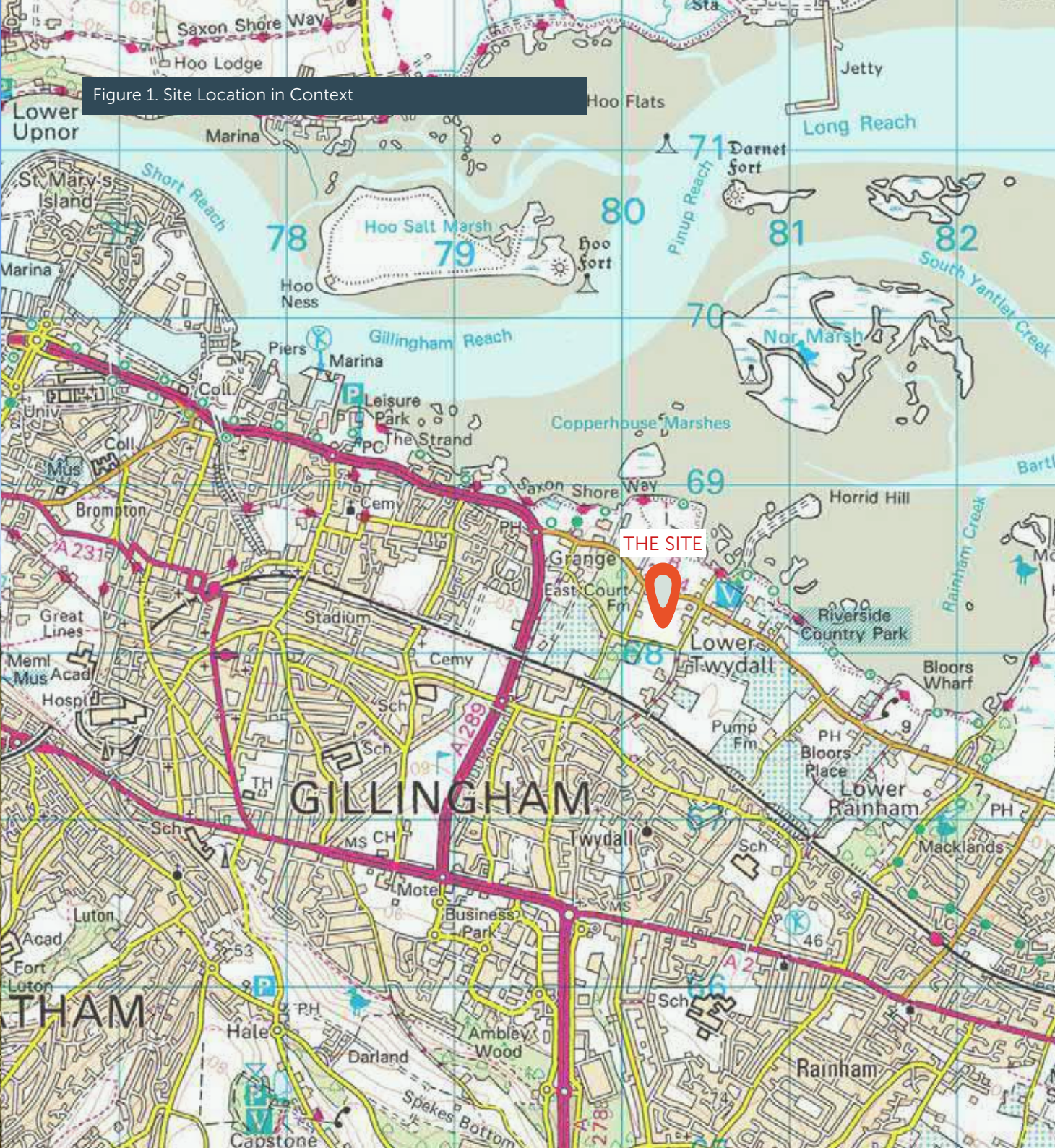
Introduction	3	The Concept	10	TECHNICAL APPENDICES
The Opportunity	6	A Sustainable Location	12	• Site Features Analysis 14
Design Principles	7	Other Matters & Conclusion	13	• Access & Movement Analysis 16
Landscape Character Review	8			



VISION:
Creating three
distinct hamlets to
support an enhanced
and productive landscape
in the Kent Fruit Belt

Revision	H
Author	AP
Issue Date	27/02/2023

Figure 1. Site Location in Context



Introduction

To support growth and prosperity of the Medway, and to help the Council meet their housing needs, new strategic sites need to be identified to deliver high quality, sustainable growth.

This document presents Catesby Estates proposals for a new landscape led residential allocation on land parcels to the south of Lower Rainham Road, Gillingham. It is submitted in response to Medway Council's emerging Local Plan (to 2040) 'Call for Sites 2022' consultation.

This document presents the real opportunity to deliver circa 400 sensitively located new homes in the form of three distinctive organically grown hamlets, all set within an enhanced, productive and complementary landscape setting.

Catesby Estates recognises the valued landscape within which the proposals are located and seeks to sensitively work within this framework, through supplementing and enhancing key characteristics and functions of the area. This includes:

- The creation of extensive areas of new publicly accessible open space, relieving visitor pressures on existing local open spaces and particularly the Riverside Country Park and associated Medway SSSI.
- Enhancements to the landscape quality and character in this part of the locally valued landscape supporting distinction between development clusters and hamlets and reinforcing the overall landscape contribution.
- Provision of indoor and outdoor community and education opportunities supporting the function and sustainability of residents in this part of the district, and connecting communities with the heritage and identity of this part of the Kent Fruit Belt.

Site & Context

The Site is located to the east of Gillingham between the areas known locally as Grange, Lower Rainham and Lower Twydall. Gillingham is a conurbation comprising a series of historic hamlets and villages. The town is within the administrative boundary of Medway Council - a unitary authority.

The Site, is located to the south of the Lower Rainham Road and north of the Lower Twydall Conservation Area. The Site comprises a series of linked and individual agricultural fields (Figure 2).

The local roads of Eastcourt Lane, Grange Road and Lower Twydall Lane pass between and bound the cluster of fields to the west. An historic and remediated chalk pit is located within the eastern cluster of fields, the extents of which are defined by the mature tree and hedgerow lines.

The Site has a gradual incline in ground level from Lower Rainham Road at around 7m AOD to 17m AOD along the southern boundary. There is a man made localised high point at around 25m created by remediation of the chalk pit.

Neighbouring Context

Agricultural land and commercial orchards to the east of the Site, were the subject of an outline planning application (Medway Ref:MC/19/1566) and subsequently a planning appeal for:

“Redevelopment of land off Pump Lane to include residential development comprising approximately 1,250 residential units, a local centre (with final uses to be determined at a later stage), a village green, a two form entry primary school, a 60 bed extra care facility, an 80 bed care home and associated access (vehicular, pedestrian, cycle): Outline application with access for consideration (matters reserved scale, appearance, landscaping and layout)-Environmental Impact Assessment Development”.

The appeal was recovered by the Secretary of State (SoS) and was refused on 3 November 2021. The Inspector's report appraised the Pump Lane scheme and concluded that permissions could not be granted for the development, with the main reasons for refusal relating to:

- Adverse landscape and visual impacts harming the character and appearance of the countryside between Lower Rainham Road and Twydall/ Rainham;
- Residual cumulative impact on local highway network

Catesby Estates have carefully reviewed the Inspector's decision and through this document we seek to demonstrate how our proposed development would positively perform in this location, such that it will work sensitively with the valued landscape and enhance the character and appearance of the countryside. The report will also demonstrate how steps can be taken to mitigate impacts on the local highway network arising from the development.

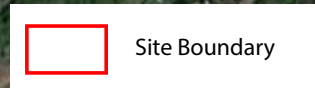
Planning Context

Medway Council are currently preparing a new Local Plan which is to replace its outdated 2003 Local Plan. The Government's Standard Method indicates a housing requirement for over 37,000 new homes over the Plan period. Whilst development of the Hoo Peninsula has achieved HIF funding and is planned to deliver in the region of 12,000 homes, this is a proposal which will take time to deliver and the outstanding requirement remains significant. In order for the Council to meet its housing requirement and maintain a 5 year housing land supply the Local Plan will need to allocate green field sites which can provide housing in the short term.

Land at Lower Rainham Road is well placed in relation to the key settlements of both Gillingham and Rainham which provide a full range of facilities to meet resident's needs. There are also opportunities to provide key facilities on the Site such as a new primary school, playing fields and community buildings which will provide benefits to both future and existing residents.

This Site can make a significant contribution towards the Council's housing requirement and the majority of the dwellings can be delivered in the first 5 years of the Plan.

Figure 2. Site Boundary



The Opportunity

THE CONTEXT

The Lower Rainham Farmland Landscape Character Area (LCA) and the Area of Local Landscape Importance (ALLI) policy designation, confirms that the existing landscape character is predominantly agricultural in nature. However, it does also contain existing hamlets and clusters of historic and more modern 20th century ribbon developments, particularly in the area of focus. The clusters have grown along the roads and lanes through this part of the LCA and create a 'transitional urban fringe character'.

This proximity to surrounding, mature urban areas and the range of services and facilities serving the existing communities supports the sustainability of this location for development.

The use and form of the fields within the Site are arable/ grazing land and include areas of horse paddocks and stables and a former chalk pit which is now remediated, capped and grassed over. This part of the ALLI does not contain orchards or other characteristic landscape features and would benefit from landscape enhancements that can be enabled by new development.

AN OPPORTUNITY FOR ORGANIC AND LOGICAL GROWTH

New clusters of organic growth can be sensitively located along the established movement routes and between existing development clusters. This follows the logic and established morphological patterns of development within this part of Medway. New population in the area will also support the provision of community uses such as a primary school, community building and a local shop reducing the need for existing residents to travel out of the locale for day to day requirements.

Alongside the clusters of development, enhancements to the landscape character can be made to not only create distinction and clear identity between the development clusters, but to supplement and enhance the overall landscape character of the wider LCA and ALLI. By contrast to the private land holdings through the rest of this area, the new landscape will be publicly accessible providing a significant benefit to the wider population of the area.

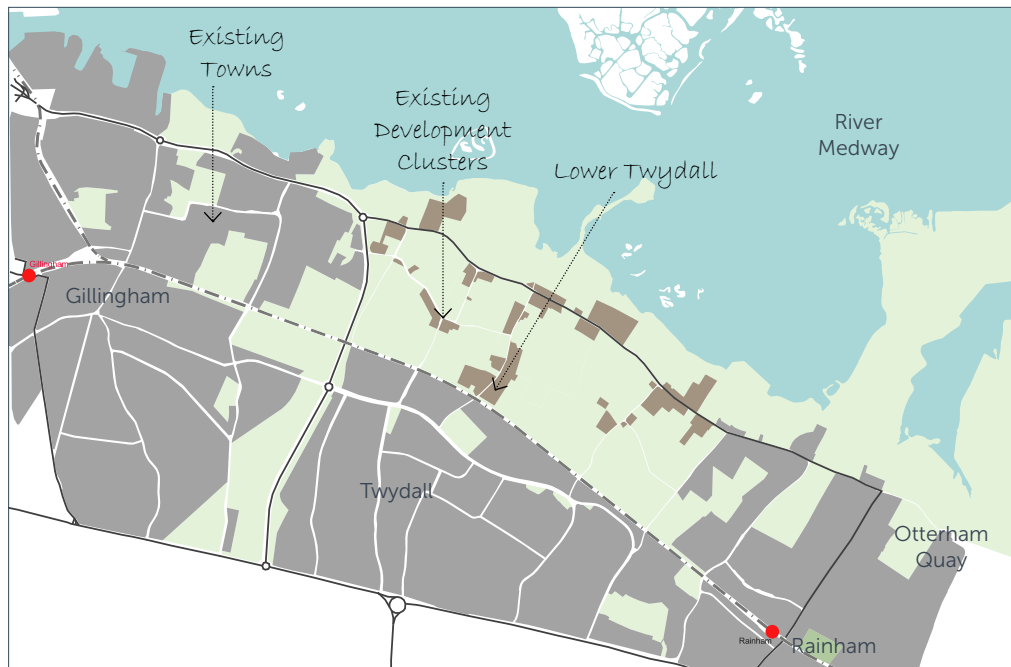


Figure 3. Existing Settlement Pattern

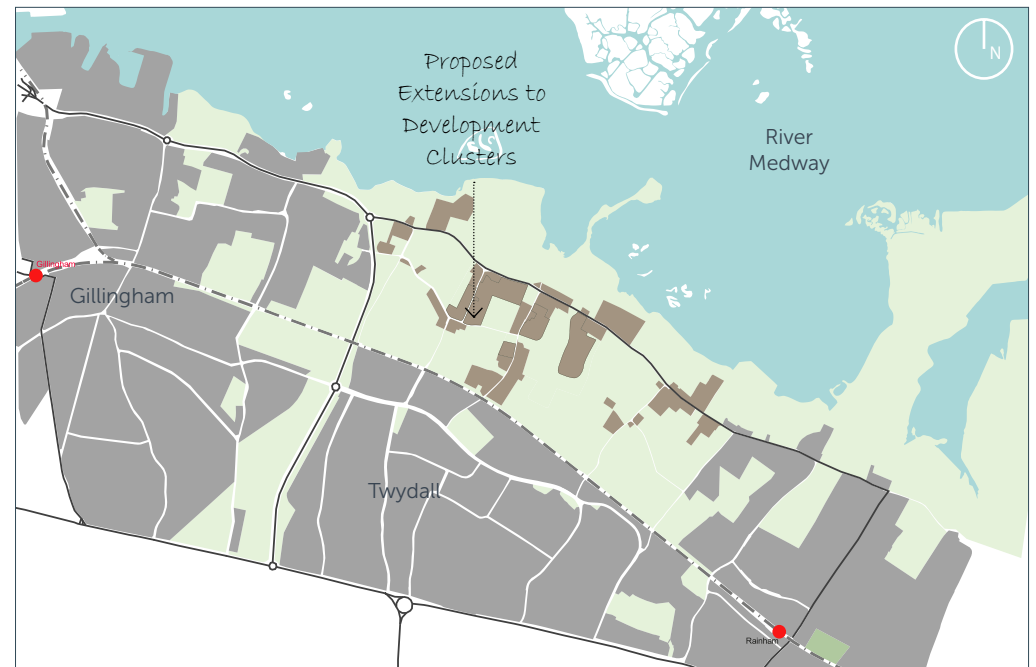


Figure 4. Logical Organic Growth of Cluster / Hamlets

Design Principles

DISTINCTIVE HAMLET/ CLUSTER CHARACTERS

- 1 **Wooded Hamlet.** Working alongside the existing dwellings on Eastcourt Lane / Grange Road, this will be the largest of the three residential clusters and will contain an area to accommodate a community hub comprised of uses such as a 1 FE Primary School, community facility and/or retail uses, and recreational uses all set within an extended wooded landscape.
- 2 **Farmstead Hamlet.** Reflecting the existing farmstead characteristics along Lower Twydall Lane and the conservation area at its southern end, new development in this cluster will be linear in nature and adopt farmstead layouts. A mixed of wooded and parkland landscape will characterise this hamlet.
- 3 **Market Garden Cluster.** Providing a transition between the 'urban fringe character' to the west and the productive landscape to the east, the market garden cluster will be defined by development set within a productive landscape.



Figure 5. Delivering Three Distinct Clusters / Hamlets

A PRODUCTIVE AND ACTIVE LANDSCAPE

- 4 **Wooded Extension.** Extending the wooded character from the west and south in and around the Wooded Hamlet and creating a visual distinction between the proposed dwellings and the more open landscape character to the east.
- 5 **New Country Park.** Utilising the elevated ground and landscape features of the remediated chalk pit area, and connections to the Riverside Country Park, a new country park will be created. Supporting the existing and proposed population and relieving visitor pressure from the existing Riverside Country Park, this area will provide new looped footpath routes, recreation and connections between the new hamlets and clusters.
- 6 **Productive Landscape.** Recognising the productive landscape character to the east and the transitional nature of this part of the Site, an area for community allotments and orchards will be provided. This also links to the character of the Market Garden cluster. Elements of productive landscape and outdoor education opportunities can be incorporated throughout the landscape area.



Figure 6. A New Productive and Active Landscape Linking the Hamlets / Clusters

Landscape Character Review

The following table provides a summary of the baseline landscape character of the Site, the potential impacts and mitigation approaches that can be employed. This analysis has helped to shape and support the proposals for land south of Lower Rainham Road as illustrated within this Vision document.

Resource / Receptor	Baseline Conditions	Potential Impacts / Mitigation
Landscape Fabric	<p>The Site comprises approx. 30ha of arable / grazing land. This includes an area of horse paddocks with stables; and a former chalk pit which has undergone remediation and is now capped / grassed over.</p> <p>The parcels of land are generally enclosed by mature trees and hedgerows, although some boundaries are low and gappy.</p> <p>There are no orchards within the Site.</p>	<p>The proposed development will result in the loss of undeveloped land but will not result in the loss of any orchards or other characteristic landscape features.</p> <p>The vast majority of trees and hedgerows around the perimeter of the Site would be retained and enhanced, and incorporated into the proposed green infrastructure network.</p> <p>The proposed green infrastructure network will occupy in excess of 50% of the total site area, and will include new productive landscapes, orchards, trees and hedgerows mirroring the wider landscape characteristics of this area.</p>
Landform	<p>The Site itself is relatively flat, sloping from the south-west to the north-east across gentle gradients.</p> <p>A localised high point is located at the former chalk pit that has been remediated and infilled.</p>	<p>No significant earthworks are proposed and the gently sloping topography of the Site would be retained, with localised changes to accommodate suitable development platforms and drainage features.</p> <p>The former chalk pit would be incorporated as part of the proposed green infrastructure network, contributing to the creation of a new country park area.</p>
Settlement and Landscape Character [Lower Rainham Farmland Landscape Character Area]	<p>Key characteristics of the Landscape Character Area include:</p> <ul style="list-style-type: none"> • A mixed pattern of orchards, arable and grazing land; • Some neglected pockets of land and sense of suburbanisation; and • Smaller hamlets of Lower Rainham and Lower Twydall which include Conservation Areas. <p>Key issues / guidelines include role of the landscape as a green link between the built-up area and Medway Estuary / Riverside Country Park; the poor accessibility to the landscape; the restoration and creation of orchards; and the long-term management of landscape features.</p> <p>In addition to Lower Rainham and Lower Twydall there are various pockets of development within the landscape, namely along Lower Rainham Road; Lower Twydall Road; Grange Road; and Eastcourt Lane</p>	<p>The proposed development will result in the loss undeveloped land but will not result in the loss of other characteristic landscape features. Parts of the Site – such as the horse paddocks and former chalk pit – are also relatively less sensitive to change.</p> <p>The concept of three distinct development hamlets / clusters will ensure that the overall landscape and settlement pattern – of clusters of development set within an established landscape framework – will remain. There will be no impact on the setting of Lower Rainham, and there will remain a landscape setting to Lower Twydall in order to protect the character of this historic hamlet.</p> <p>The proposed green infrastructure network will separate these neighbourhoods and ensure that they are well integrated into the landscape. The green infrastructure network also ensures there will remain green linkages between the built-up area and Medway Estuary; will improve access to the landscape; and will allow for the creation of new orchards.</p> <p>All existing and proposed landscape features will be subject to long term management. The opportunity exists for the landscape to be managed as part of Riverside Country Park or by local groups.</p>

Resource / Receptor	Baseline Conditions	Potential Impacts / Mitigation
Views and visual amenity	<p>Views across the Lower Rainham Farmland Landscape Character Area are generally limited by the relatively flat topography; mature trees and hedgerows along field boundaries and roads / lanes; and intervening development.</p> <p>Views of the Site are generally only visible in relatively close proximity, where Site boundary features are low and gappy. The Site is typically seen in the context of existing built development along Lower Rainham Road; Lower Twydall Road; Grange Road; and Eastcourt Lane.</p> <p>Further north, from within the Riverside Country Park, the Site is not generally visible due to intervening vegetation within the Riverside Country Park and views are of a 'wooded' horizon with glimpses of development in and around Lower Rainham and on higher ground to the edge of Gillingham.</p>	<p>The proposed development is unlikely to be a prominent feature in views, assimilated into the landscape by existing and proposed vegetation. Where visible, residential development is not considered to be an uncharacteristic feature of existing views.</p> <p>The concept of three distinct development Hamlets / clusters - separated by green infrastructure - will further ensure the proposed development is not visually prominent and that there is a degree of screening around each cluster.</p> <p>From the Riverside Country Park specifically there will no open views of the proposed development and there would remain views of a 'wooded' horizon, a feature which will be enhanced by the development approach proposed.</p>
Gillingham Riverside Area of Local Landscape Importance (ALLI)	<p>The ALLI is described as a predominately rural landscape - containing a number of orchards - which provides a green backdrop to the Medway Estuary and buffer between the built-up areas of Twydall / Rainham and the Medway Estuary. It also provides access from the built-up area to the more rural landscape.</p>	<p>The proposed development will result in the loss of undeveloped land, but is designed to work organically with the existing morphology of the existing settlement and landscape pattern.</p> <p>There will remain a green buffer between the built-up area and the Medway Estuary - and a wooded, green backdrop to the Medway Estuary - with green infrastructure separating these development clusters and ensuring they are well integrated into the landscape.</p> <p>The proposed development will not result in the loss of any characteristic orchards or other notable landscape features, and new locally characteristic landscape features will be created as part of the green infrastructure network. The green infrastructure will be publicly accessible, improving access to wider landscape.</p>
Rural Lanes	<p>Grange Road, adjoining part of the Site is designated as a rural lane which are of landscape, amenity, ecology and heritage value.</p>	<p>The proposed development will not result in the loss or modification of Grange Road; the hedgerow along Grange Road will be retained / enhanced through new tree planting; and development would be set back from the road corridor.</p> <p>The opportunity also exists for sections of rural lanes to be designated for cyclists and pedestrians only - with vehicular traffic diverted into the proposed development - which could further improve character / access to the landscape.</p>
Access and Recreation	<p>The Site is not publicly accessible and contains no public footpaths, bridleways or cycle routes.</p> <p>The Riverside Country Park is located to the north of the Site. Access to the Country Park is via a number of 'lanes' connecting from Lower Rainham Road.</p>	<p>The proposed development will not result in the loss or modification of any area of public open space or routes.</p> <p>The proposed green infrastructure network will occupy in excess of 50% of the total site area, providing a range of new routes / spaces and enhancing access to the landscape.</p> <p>The opportunity also existing to improve connectivity and access to the Country Park from the existing built-up area.</p>

The Concept

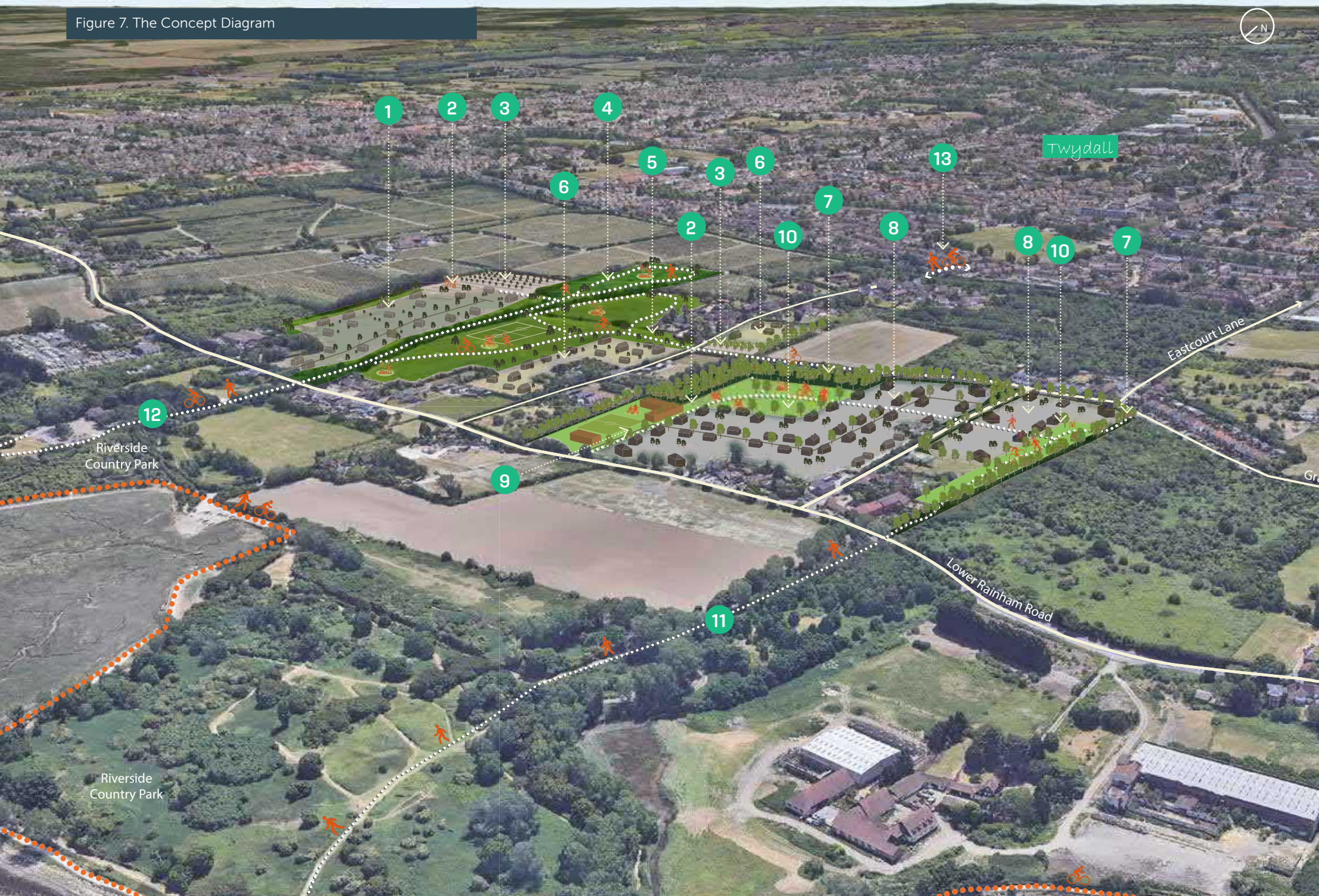
The Illustrative Concept Masterplan shows one design response for the Site as a stand alone development, but also a response which could easily integrate into a linked and comprehensive development scheme should adjoining sites come forward.

Development of the Site can deliver the following benefits:

- Around **400 new homes** in a mix of sizes and types set **within three new distinctive hamlets / clusters** influenced by the established morphology and landscape characteristics.
- Policy compliant provision of **affordable housing** in a mix of sizes and tenure responding to identified local need with the possible inclusion of up to 5% self-build plots and accessible homes for the elderly.
- Potential to accommodate **a new community hub containing a new 1 FE (form entry) primary school site, community rooms and local retail**, alongside a **network of community growing and environmental education spaces**.
- Delivery of a range of **new children's play areas** within an extensive open space network.
- Enhanced **pedestrian and cycle links** to Twydall supporting sustainable routes to existing services and facilities.
- An **extensive multi-functional open space**, landscape and biodiversity network accommodating existing features as well as providing new, diverse landscape planting and enhanced ecological habitats.
- Delivery of a **new country park** landscape through which a network of pedestrian routes can pass and link between the three hamlets. Linked to the Riverside Country Park this area can relieve visitor pressures and offer new residents a significant area to spend leisure time.
- Creation of new **linked footpath and leisure routes** through the development and open space network. The opportunity to enhance or provide **new safe routes to surrounding community and leisure uses** will be explored.
- Provide **appropriate separation to the Lower Twydall Conservation Area**, while also providing new homes in a highly sustainable location.

- 1 Market Garden Cluster
- 2 Community Allotments
- 3 Community Orchards
- 4 New Country Park with recreation and play facilities and views towards the Estuary
- 5 Footpath / Cycle Network
- 6 Farmstead Hamlet
- 7 Woodland planting
- 8 Wooded Hamlet
- 9 Community Hub (1 FE Primary School, Community Room / Local Retail)
- 10 Public Open Space
- 11 Footpath links to Riverside Country Park
- 12 Enhanced footpath / cycle links to Riverside Country Park and NCN1 cycle route.
- 13 Enhanced railway footbridge links to Twydall

Figure 7. The Concept Diagram



A Sustainable Location

The Site is located within good proximity to a significant and wide range of facilities and services in and around Gillingham. This includes railway stations; national supermarket chains; healthcare providers; education facilities; recreation; and community uses.

We are aware of the Inspector's appeal decision at Pump Lane with regard to concerns relating to impacts on the highway network. Our proposals include a range of features which encourage internalised movement trips as well as a green travel plan promoting sustainable and active transport. This includes:

MIXED USES

- A 1 form entry primary school and a mixed community / retail unit;
- Provision of community facilities; and
- Extensive open space networks on site.

WALKING / CYCLING

The Lower Rainham Road Site is located in close proximity to a range of Public Rights of Way and National Cycle Network (NCN1) also routes.

On-road cycling on Lower Rainham Road is considered possible for more proficient cyclists (40mph carriageway).

Opportunities to provide enhanced cycle links north to connect with the NCN1 cycle route will also be explored.

The existing footbridge over the rail line to the south of the site provides existing links to facilities in Twydall. The bridge has shallow steps supporting use by pedestrians, cyclists and the ambulant disabled. As part of any development there is the potential to further enhance the attractiveness and pleasantness of this route and bridge crossing, such as providing low-level sensor street lighting, vegetation removal, CCTV, and signage.

PUBLIC TRANSPORT

The Site is in close proximity to frequent bus services operating on Lower Rainham Road. Arriva and Nu-Venture are local providers in the area, and are be sensible partners to provide a public transport strategy for the Site. At this time we would look to explore options for service enhancements on the following routes:

- Arriva Service 1 – services to/from Gillingham and Chatham (town centre, bus station, rail station)
- Nu-Venture Service 131 – services to/from Rainham and Rainham rail station

A public transport strategy will also include information and incentives to encourage residents to use services. This would include:

- Household Welcome Packs for each household containing public transport information.
- Advertising Arriva's smartphone Apps (online tracking, service times, ticketing).
- Providing each dwelling with a pre-loaded Smartcard to provide a few weeks' free bus travel.

It is also recognised that Medway Council are seeking to introduce more electric buses in to the area, both as a way of reducing emissions but also to support the improvement of air quality standards, particularly through the AQMAs (Air Quality Management Areas).

Development of this Site, in collaboration with Arriva and Nu-Venture and improving technology, offers a real opportunity to achieve this objective and provide quiet and clean bus services along Lower Rainham Road.

FUTURE GAME CHANGERS

The current and future innovations in transport technology and changing working / shopping habits in a post-Covid-19 era also offer great opportunities to develop a community with a reduced reliance on private motor vehicles and supported by sustainable movement options.

Some new technologies that will be integrated into the development scheme to aid the move to more sustainable transport options include:

- Electric Charging Hubs where e-bikes, e-scooters and electric pool cars can be hired by residents to support short journeys to local facilities in and around the area.
- Household electric charging for vehicles.
- Mobility as a Service (MaaS). Through the use of joint digital channels, users can plan, book and pay for multiple types of mobility services, creating linked trips and supporting a move away from personally-owned modes of transportation.
- Smart autonomous deliveries / autonomous pods / drone delivery
- 5G network and superfast broadband support working from home capability and reduce the need for regular commuting patterns.

Other Matters & Conclusion

Deliverability

The NPPF and the Government’s growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase housing supply, support growth and boost home ownership. To be considered deliverable sites should meet the following tests:

- Be Available
- Be Suitable
- Be Achievable

The Site satisfies each of the NPPF criteria as follows:

Available

Catesby Estates have agreed terms with the owners of the land to promote it for residential development. Catesby Estates is committed to the delivery of high quality homes and associated environment. This will provide much needed housing in an attractive and sustainable location.

The concept masterplan illustrates that the Site could deliver circa 400 new dwellings. On average from the date of an outline consent to start on site is around 20 months for our schemes. As such this Site could start delivering housing numbers early in the plan period.



Suitable

The site is suitable for housing development because it:

- Is a suitable and sustainable location in relation to existing movement, facilities and service infrastructure;
- Is land available for immediate development which can be delivered holistically with a range of supporting infrastructure and facilities;
- Has no identified environmental constraints that would prevent it from coming forward for residential development;
- Will deliver public benefit in addition to new housing, including much needed affordable housing and community uses all set within an extensive multi-functional landscape; and
- Is highly sustainable as it is within walking distance to local services and facilities and is served by existing public transport provision on Lower Rainham Road. This could be enhanced through improvements to service frequency as a direct result of this development proposal.



Achievable

The concept masterplan illustrates that the site could deliver circa 400 dwellings, with associated community infrastructure and an extensive landscape and public open space network. This will make a significant contribution towards meeting the housing needs of the area while supporting character enhancements to the local landscape all set within a sustainable location.



CONCLUSION

This Vision Framework and the accompanying supporting technical documentation identifies that the Site has no restricting constraints for development. It is considered that this Site should be included in the Council’s Local Plan as an allocated site for a residential led development.

TECHNICAL APPENDIX

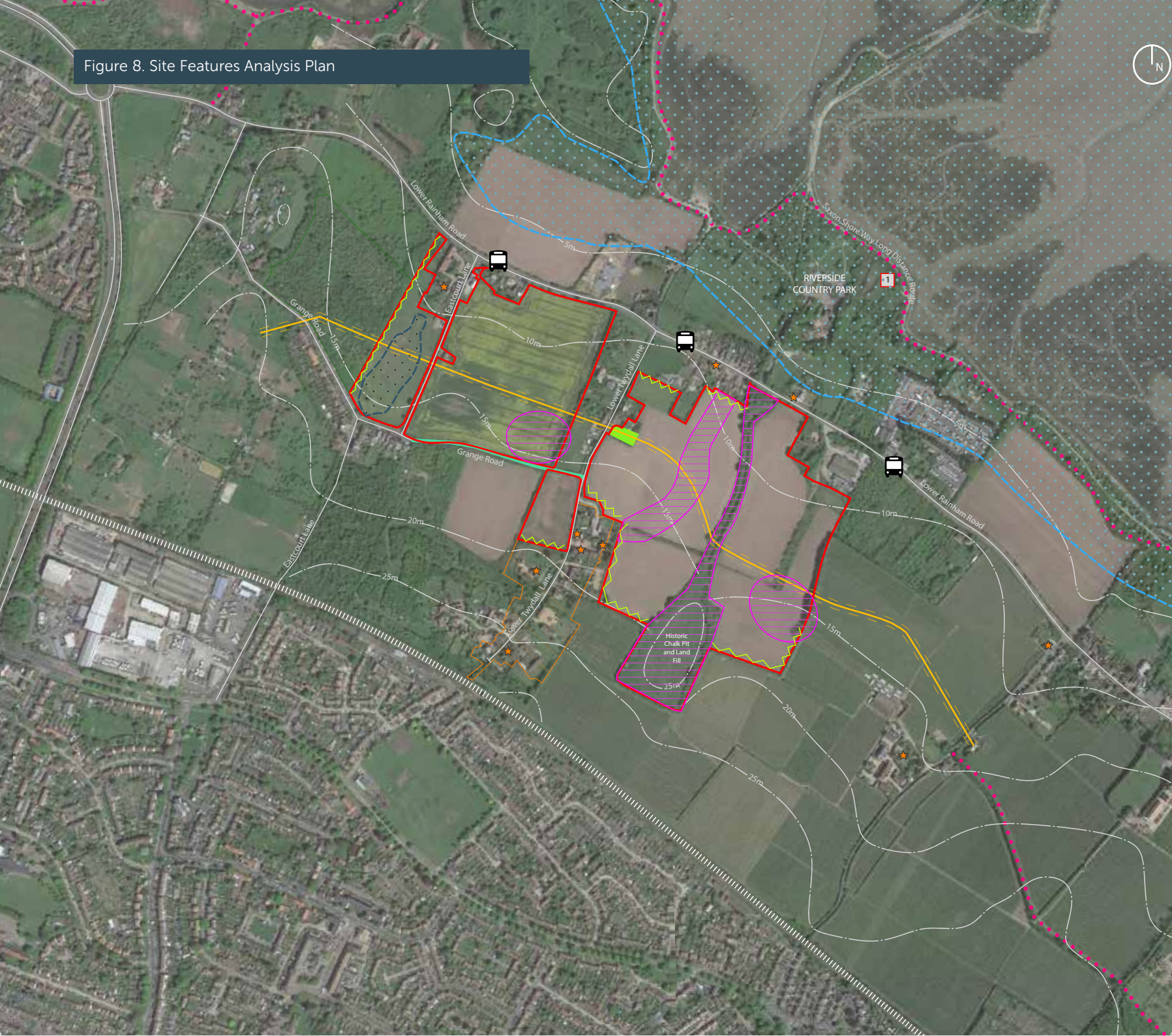
Site Features Analysis

Following analysis of environmental and technical features of the Site the following table and plan confirm that there are no significant physical, environmental or technical constraints to developing the site for residential use. This plan underpins the development rationale and concept masterplan section of this document.

Feature	Summary
Topography	The Site has a gradual rise from around 8m AOD at the Lower Rainham Road boundary up to around 17m AOD along the southern boundary. A localised, man made high point is evident at around 25m AOD and relates to the chalk pit and subsequent land fill zone.
Noise	The road network surrounding the Site produces a background noise level which will be assessed and where required, mitigated through the design and orientation of the proposed development.
Ecology	Habitats of elevated value include the hedgerows and mature trees. Surveys for bats, reptiles and breeding birds are being completed, and appropriate mitigation can be provided. There are also significant opportunities for biodiversity enhancement through green infrastructure provision on Site.
Ground Conditions	Areas with potential for ground instability have been identified, and advised as areas of no build. Where required access routes can be taken across these areas. These areas can also be used as public open space contributing to the future open space network on Site.
Flood Risk & Drainage	<p>The Site is located in Flood Zone 1 (EA mapping), and is not at risk of flooding from rivers, sea or reservoirs. A small area of existing surface water flooding is evident in western most field. This will be resolved as part of the development solution.</p> <p>Sustainable drainage features will be accommodated on site to attenuate surface water run off generated by development of the site. The outfalls will be into the Lower Rainham Road to connect to the headwall to the north into the Medway.</p>
Highways, Access & PRow	<p>Primary Accesses into the Site will be from the Lower Rainham Road.</p> <p>Existing roads will be retained and integrated within the new layout, with some dwellings served from the existing roads.</p> <p>Pedestrian access to existing bus stops on Lower Rainham Road will be provided, and enhancements to connections to Lower Twydall Lane pedestrian bridge will be explored. New pedestrian routes will be provided throughout the Site, particularly connecting to new and existing open spaces and between clusters / hamlets.</p>
Utilities	A 1.5m foul pipe line passes through the Site on an east/west alignment. A 12m no build easement corridor (6m either side) is indicated. Primary and secondary roads and associated corridor can be built within the pipeline easement.
Best & Most Versatile Land	An initial assessment has been undertaken and identifies that the majority of the Site is likely to be Grade 3B, based on previous uses. There is a possibility that some of the land could be Grade 1 and 2. Whilst the Site can be classed as Best and Most Versatile (BMV), all agricultural land to the north and east of Gillingham is classified as BMV and therefore this should not be a barrier to future development.

Feature	Summary
Landscape & Arboriculture	<p>The Site and immediate surroundings fall within an area locally designated as an area of Local Landscape Importance (ALLI). The River Medway and adjacent mudflats to the north of the Site are designated as the North Kent Marshes Special Landscape Area. Grange Road, in part adjacent to the Site, is locally designated as a Rural Lane. The layout of development should work with the existing landscape pattern and a strong green infrastructure network should be created to ensure that the area continues to function as a green buffer separating the built-up areas of Twydall and Rainham from the Medway Estuary.</p> <p>The boundaries of the Site and field boundaries within the Site are generally defined by hedgerows with occasional trees. Where possible these features will be retained and integrate within the development layout, where removed to facilitate appropriate layouts/access then new planting will be provided within the public realm and open spaces.</p> <p>The former chalk pit and access off the B2004 are defined by established hedgerows with hedgerow trees. The Site of the former chalk pit is elevated above surrounding levels providing a view to the Medway. This view would be retained and the former chalk pit would form part of the green infrastructure proposals that includes the provision of parks and open spaces, areas for formal and informal play, orchards and wildlife habitats.</p>
Heritage	<p>Lower Twydall Conservation Area (CA) is accessed from Lower Twydall Lane and contains five listed buildings within the CA boundary.</p> <p>Appropriate buffers will be provided to this area to retain its distinctive character as a defined hamlet and to respond to the setting of the listed buildings as appropriate.</p> <p>Individual listed buildings are also located on Lower Rainham Road and Eastcourt Lane in relative proximity to the Site. Buffers will be provided within the Site to respond to the setting of the listed building as appropriate.</p> <p>The archaeological potential of the Site will need to be investigated further to inform the layout of any future scheme, in particular to avoid impacts on any deposits that contain Palaeolithic artifacts.</p>

Figure 8. Site Features Analysis Plan



- Site Boundary
- Lower Twydall Conservation Area Boundary
- ★ Listed Buildings
- ⋯ Existing Public Rights of Way and Saxon Shore Way
- National Sustrans Cycle Route 1
- 🚌 Existing Bus Stop
- Extent of EA Flood Zone 3
- Areas at Medium to High Risk of Surface Water Flooding
- Potential No Build Zones due to ground conditions
- Existing Traditional Orchard Area
- Foul Sewer with Easement - 15m corridor (6.5m either side of 1.5m diameter pipe)
- ~ Landscape Buffer Zone
- Rural Lane Policy

TECHNICAL APPENDIX

Access and Movement Analysis

The Site lies to the south of Lower Rainham Road (B2004) which provides access to Lower Twydall Lane, Eastcourt Lane, Lower Featherby Road and Grange Road. The Site is 6km from Junction 3 of the M2.

A number of buses operate within the local vicinity as identified at Figure 9. The nearest bus stops to the Site are on Lower Rainham Road, and approximately 1km south on Beechings Way.

Bus stops along Lower Rainham Road are served by the number 1 and 131 services. The No. 1 operates an hourly service between Chatham and Riverside Country Park on Sundays. The 131 service travels between Medway Maritime Hospital and Maidstone (via Rainham Railway Station) from Mondays to Fridays, every 1 to 2 hours.

The Beechings Way bus stops are served by the 101, 183 and 116 services. The 101 service operates between Gillingham and Maidstone (via Brompton and Chatham Railway Station); every 30 minutes from Mondays to Saturdays and hourly on Sundays. The 183 service operates two journeys every weekday between Twydall and Asda Gillingham. The 116 service travels between Chatham and Hempstead Valley (via Gillingham) from Mondays to Saturdays, every 30 minutes.

The 116 service can also be used by those who need to travel to education facilities such as St Augustine School, Byron Primary School, Mid Kent College and the Universities at Medway. In terms of other school buses, Medway Council provide a MY school bus service which provides students with specific bus services to their school destination.

A network of Public Rights of Way (PRoW) connect Gillingham to neighbouring settlements and beyond. The nearest PRoW to the Site is the Saxon Shore Way, a long distance footpath which traces the coast between Gravesend and Hastings. This route is also National Cycle Route 1 (NCN1). This can be accessed from Copperhouse Lane, Sharps Green or Riverside Country Park. In terms of local accessibility, the footbridge south of Lower Twydall Lane allows shortened walking distances towards facilities at Twydall.

Rainham Railway Station is approximately 3.3km south east of the Site at Station Road, and Gillingham Station is 3.7km west of the site. Southeastern operate regular services from both stations to Faversham (18mins), Dover Priory (45mins), Ramsgate (1hr 6mins), London Victoria (1hr 10mins), London St Pancras (1hr 24 mins) and Luton (2hrs 36mins) via destinations such as: Gravesend, Ebbsfleet International, Canterbury East, Dartford, Bromley South, Margate, Denmark Hill, London Bridge, Greenwich, Deal, Ashford International, St Albans City and Luton Airport.

Bus service enhancements will be explored as part of a future transport strategy for any application for the Site. These improvements would look to provide quick and convenient connections to key services such as schools, shops, employment areas and the nearby train stations. This would be one part of a wide reaching Travel Plan which would seek to prioritise walking and cycling opportunities and reduce the reliance on the private car.



Figure 9. Local Movement Analysis



HEAD OFFICE: Orchard House, Papple Close, Houlton, Rugby CV23 1EW
T: +44 [0]1788 726810 E: info@catesbyestates.co.uk W: www.catesbyestates.co.uk

SOUTH EAST OFFICE: Arena Business Centres, First Floor, The Square, Basing View, Basingstoke, RG21 4EB
T: +44 [0]1256 637914 E: info@catesbyestates.co.uk W: www.catesbyestates.co.uk

© The contents of this document must not be copied or reproduced in whole or part without the written consent of Catesby Estates

We have taken all reasonable measures to present this information with due care and it is considered correct at time of printing. However, the information contained within, is subject to change without notice, and Catesby Estates and its employees and agents shall have no liability to the users for any loss, damage, cost or expense incurred or arising by reason of any person using or relying on this information.

Land South of Lower Rainham Road, Gillingham

Landscape, Visual and Design Summary Note

October 2023

Version: 0.1
Version date: October 2023
Comment Final

This document has been prepared and checked in accordance with ISO 9001:2015.

A Worton Rectory Park
Oxford
OX29 4SX
United Kingdom
T 01865 887 050

W www.lda-design.co.uk

Introduction

Land South of Lower Rainham Road, Gillingham ('the Site') has previously been promoted to Medway District Council - by Catesby Estates – as a potential site for the creation of new sustainable community.

As part of the ongoing promotion of the Site, LDA Design prepared a 'Landscape, Visual and Heritage Appraisal' (2020) ('the Appraisal') to assess the suitability of the Site for residential development from a landscape and visual and heritage perspective; and to inform the emerging scheme design. This report is included in **Appendix 1** of this Appraisal.

The proposed development was designed as series of clusters of development, utilising the existing landscape structure and reflecting the dispersed settlement pattern throughout this area. This included extensive new areas of publicly accessible open space.

The Appraisal concluded the Site can accommodate new development (of the type and configuration proposed) without undue consequences on landscape character, views and heritage features.

The adjoining site at Pump Lane was also proposed for residential development, and an Outline Planning Application submitted in 2019 (Ref MC/19/1566). This was dismissed at appeal for several reasons but including landscape and visual matters. The Inspector concluded that *".... the appeal scheme would have substantial adverse landscape and visual impact, with corresponding harm to the character and appearance of a wide swathe of countryside between Lower Rainham Road and Twydall/Rainham"*.

Since this time Medway District Council are preparing a new Local Plan and are consulting on growth options as part of the Local Plan Regulation 18 consultation. The Local Plan identifies 'suburban expansion' as one potential scenario, focussing growth near to existing communities, and land to the north of Rainham is one such area.

Medway District Council have identified that the land to the north of Rainham is a largely agricultural landscape; an important part of the green infrastructure network; and the Medway Estuary is of designated for its wildlife value. However, Medway District Council also note that growth in this location could introduce the concept of the '15-minute neighbourhood' - where communities can benefit from expanded / new services on their doorstep, such as schools, healthcare, and flexible workspace. Growth in this location also provides an opportunity to enhance sustainable travel options, making it easier and more attractive for people to walk, cycle and use public transport.

This briefing note summarises the findings of the original Appraisal; highlights the potential benefits of considering a larger, landscape-led masterplan within this broad location; and set out the key principles that should be followed for any future development in this area.

Summary of Landscape and Visual Issues

While Medway District Council describe this area as a largely agricultural landscape, it is noted the Medway Landscape Character Assessment (2011) describes this area is fragmented landscape, comprising a mix of arable land, orchards, grazing, and neglected parcels of land and identifies the poor condition of some areas. The Landscape Character Assessment also identifies the opportunity for improved land-uses; improved linkages / public access; and generally improved landscape management.

Whilst new development would inevitably result in the loss of areas of undeveloped land, there is the potential to mitigate adverse effects and deliver localised environmental enhancements through a comprehensive landscape strategy. This includes enhanced and new boundary features to aid integration; new productive landscapes – such as orchards and allotments; and new accessible landscapes for amenity and recreation.

Despite several north-south lanes running through the landscape, access to coast, Riverside Country Park and Saxon Shore Way LDR is relatively poor. The opportunity exists to create new of new pedestrian and cycle routes to improve connectivity across the landscape and better connect existing and new communities with the coast.

A new network of spaces and routes throughout the landscape could be considered as an extension to the Riverside Country Park, alleviating existing visitor pressure and – through better pedestrian and cycle connectivity with the existing urban area – minimising the need to access the County Park via car.

The role of the landscape as a ‘green buffer’ separating the built-up areas of Twydall and Rainham from the Medway Estuary – albeit one that is already characterised by built development and areas of settlement - would be retained through the comprehensive landscape strategy. This would also ensure the continued role of the area as a green back drop in views from the Medway.

The historic pattern of the local landscape - with north south routes connecting higher ground to the south of the Site to the River Medway – will be retained through the retention of existing routes and the alignment / arrangement of new roads and paths. The existing dispersed settlement pattern will also be retained through the creation of new clusters of development, carefully arranged within the existing landscape structure and network of routes.

Grange Road is designated as a Rural Lane. The route would be retained as part of the development and its rural qualities maintained by offsetting the edge of the adjacent built development and enhancing the adjacent hedgerow. There is also potential to enhance the rural qualities, amenity, and biodiversity value of a stretch of Grange Road adjacent to the Site by diverting vehicular traffic into the development.

The Site is located adjacent to the Lower Twydall Conservation Area, which contains several Grade II Listed Buildings that reflect the rural character and qualities of the settlement. New built development is offset, and areas of public open space and community orchards are proposed for the area within the offset.

Two listed buildings along Lower Rainham Road to the north of the Site (East Court Farmhouse and The Black House) similarly have a rural character. New built development will be offset and areas of public open space, including orchards are proposed for the areas within the offset.

There is potential to enhance the understanding of the area's heritage through the provision of interpretation within areas of public open space and/or within the community building, highlighting the important Palaeolithic artefacts found locally and incorporating any results from investigations in advance of development.

Commentary on Wider Area

It is considered that the opportunity exists to create a sensitive masterplan for the wider area – including both the Lower Rainham Road and Pump Lane sites - that works within the existing landscape framework and provides greater opportunities landscape enhancement; open space provision; and the creation of new routes.

In line with the emerging proposals for Lower Rainham Road site, this could include a series of smaller development parcels, set within the network of existing / proposed fields and routes. Development parcels would be sensitively located to ensure the existing 'dispersed' settlement pattern is retained and opportunities for open space / landscape connectivity are maximised.

The greater quantum of development is also likely to allow for the delivery of other community facilities and services.

Design Principles

It is recommended that any development proposals for broader Rainham Road area should adhere to the following principles to ensure a 'landscape-led' masterplan and provide appropriate mitigation by design.:

- Appropriate scale and extent of development that reflects the dispersed settlement pattern and follows the south-west to north-east orientation of lanes and fields.
- Development configuration and vernacular that reflects the character of the local villages rather than adjacent urban areas.
- Retention and enhancement of boundary vegetation and appropriate development offsets from adjacent roads to retain landscape structure and integrate the development into the landscape.
- New planting within the proposed development to create an attractive setting and further help integrate new buildings into the landscape.
- Landscape buffer containing productive orchards and public open space to limit adverse effects on the setting of the Lower Twydall Conservation Area.
- Creation of an extensive, well connected, and multi-functional network of public open spaces and areas for wildlife.
- Sustainable drainage features integrated with landscape proposals offering opportunities for amenity and enhanced wildlife value.

- Network of new publicly accessible pedestrian and cycle routes running through the development and proposed open space including connections to the Riverside Country Park.
- Areas of public open space and routes to include appropriate signage, including interpretation of any important landscape and heritage features.
- Proactive management and maintenance of public open spaces and landscape features such as hedgerows and community orchards to maintain the long-term amenity and biodiversity interest.

The diagrams presented at the end of this report illustrate the existing suburban context and a potential concept landscape-led concept for the model of suburban growth in this location.

Conclusion

It is concluded that if these principles are followed, landscape, visual and heritage harm can be minimised, and the function of the Area of Local Landscape Importance, maintained.

With development in place there would remain a green buffer separating the built-up areas of Twydall and Rainham from the Medway Estuary, and there would be a continued pattern of clusters of development within a strong landscape framework. The opportunity exists to improve neglected parcels of land and to enhance existing / create new characteristic landscape features, such as hedgerows and orchards.

One of the greatest benefits arising from the scheme is the opportunity to create new accessible open space; enhance connectivity between the main built-up area of Rainham, and the Medway Estuary / Riverside Country Park; and to generally improve access to the landscape. A new network of spaces and routes throughout the landscape could be considered as an extension to the Riverside Country Park.



- Urban areas
- Suburban development
- Indicative development clusters
- Existing right of way
- Existing road access across railway
- Existing pedestrian access across railway
- Existing country park
- Indicative greenspace
- Indicative green corridor
- Indicative park
- Indicative pedestrian and cycle links

Figure 1: Existing context



Figure 2: Indicative landscape-led development concept

Appendix 1: Landscape, Visual and Heritage Appraisal (2020)

Land South of Lower Rainham Road, Gillingham

Landscape, Visual and Heritage Appraisal
June 2020

^A Worton Rectory Park
Oxford OX29 4SX
United Kingdom

^T +44 (0) 1865 887050

^F +44 (0) 1865 887055

^W www.lda-design.co.uk

LDA Design Consulting Ltd
Registered No: 09312403
17 Minster Precincts, Peterborough PE1 1XX

June 2020

Land South of Lower Rainham Road, Gillingham

June 2020

Land South of Lower Rainham Road, Gillingham

Contents

1.0	Introduction.....	1
1.1.	Context and Purpose of the Appraisal.....	1
1.2.	The Site	2
1.3.	The Proposed Development.....	2
1.4.	Assumptions and Limitations	2
2.0	Landscape and Visual Appraisal.....	4
2.1.	Approach to the Appraisal.....	4
2.2.	The Site and Study Area	4
2.3.	Baseline Conditions	4
2.4.	Potential Effects and Recommendations	18
3.0	Heritage Appraisal.....	25
3.1.	Approach to the Appraisal.....	25
3.2.	The Study Area.....	25
3.3.	Assumptions and limitations.....	25
3.4.	Planning Policy Overview	25
3.5.	Baseline Conditions	29
3.6.	Potential Effects and Recommendations	32
4.0	Summary of Proposed Mitigation Measures	37
5.0	Conclusion.....	38

June 2020

Land South of Lower Rainham Road, Gillingham

Version	1
Version date:	June 2020
Comment	First Draft

This document has been prepared and checked in accordance with ISO 9001:2008.

June 2020

Land South of Lower Rainham Road, Gillingham

1.0 Introduction

1.1. Context and Purpose of the Appraisal

The Medway Strategic Land Availability Assessment (SLLA)¹ presents the Council's initial assessment as to whether the sites assessed are free of constraints and are likely to come forward for development.

Land at Manor Farm, Lower Rainham Road, Rainham (SLLA Reference 1303), which is broadly consistent with the Site considered in this Appraisal, is included in the SLAA. The conclusion recorded for Site 1303 is that it is excluded "...due to distance from services and facilities, heritage and landscape impact".

Under the Stage 2 assessment in the SLAA, landscape and heritage considerations (which form the focus of this Appraisal) fall within the 'Suitability' criteria, along with other considerations including 'access to services and facilities', 'access to open spaces' and 'transport'.

Site 1303 is recorded as 'red' in the RAG rating which represents an "...informed judgement concluded on the overall suitability of the site for development". To be allocated a red RAG rating under the Landscape & Environment criteria, the table on page 19 of the SLAA records that:

"The site falls within a landscape of either or both of high sensitivity and good condition in the Medway LCA 2011 and significant ecology interests may exist. Or have an impact of a designated habitat. Likely to have a detrimental impact on the purposes of the AONB and/or Green Belt designations."

To be allocated a red RAG rating under the Heritage criteria, the table on page 19 of the SLAA records that:

"Development is likely to have a significant impact upon designated heritage assets. Development would be likely to result in complete or partial loss of heritage asset."

Under the Stage 2a assessment in the SLAA, consideration is given to 'Overcoming constraints'. The site is recorded as red in the RAG rating.

The executive summary to the SLLA notes that it does not predetermine the Council's future assessment of sites through the local plan and development management processes. It is also noted (Para. 1.3) that the SLAA is based on information available at a fixed point in time and the outcome of the assessment of sites may be subject to change, for example as a result of constraints being overcome or mitigated.

The purpose of this Landscape, Visual and Heritage Appraisal (the Appraisal) is to assess the suitability of the Site for residential development from a landscape and visual and heritage perspective in more detail than is presented in the SLAA. Consideration is given to a realistic development scenario for the Site that incorporates recommendations regarding the layout of the proposed development and structural landscape, along with measures to mitigate adverse landscape, visual and heritage effects and deliver localised environmental enhancement.

¹ Medway Council, December 2019, Medway Strategic Land Availability Assessment (Fourth Iteration)

June 2020

Land South of Lower Rainham Road, Gillingham

The Appraisal has been undertaken by LDA Design Consulting Limited (LDA Design) and Headland Archaeology (Headland) on behalf of Catesby Estates, who are promoting the Site on behalf of the landowner. It forms part of a suite of documents being submitted to Medway District Council as part of representations to the SLAA consultation process.

1.2. The Site

The Site is located to the east of Gillingham, north-west of Rainham and north of Twydall. Its full extents are within the administrative area of Medway District, Kent.

The Site comprises four individual parcels of land, totalling approximately 30ha.

The immediate context of the site is characterised by farmland with relatively intact hedgerows. Commercial orchards are characteristic of the land immediately east of the site.

The small settlement of Lower Twydall, focussed on Lower Twydall Lane lies between the two main areas of the Site. Predominantly residential properties lie along the northern boundary of Site off the Lower Rainham Road (B2004) and there are areas of further residential development including at Grange Road and Eastcourt Lane in proximity to the Site.

South of the site is the mainline railway linking London and Dover / Ramsgate, beyond which extends the urban area of Twydall. West of the Site is the A209 and urban fringes of Gillingham. South east of the site is the urban edge of Rainham, defined in this location by Berengrave Lane.

North of the B2004 the landscape includes areas of residential development, a boat yard and arable and pastoral land uses, beyond which extend the intertidal marshes and mudflats fringing the River Medway. Land along the River Medway is forms part of the Riverside Country Park.

1.3. The Proposed Development

The proposed development is for approximately 500 new residential dwellings along with a community building/village meeting room; one form entry primary school; and a multifunctional green infrastructure network comprising structural landscape, formal and informal play areas, formal sports provision, community orchards, routes for walking and cycling, sustainable drainage and wildlife habitats.

The Indicative Concept Masterplan for the Site is presented in the Vision Framework (Catesby Estates, June 2020) which is included as part of the representations. It illustrates the key features of the proposals, including measures to mitigate adverse landscape, visual and heritage effects and deliver localised enhancements recommended by LDA Design and Headland.

It should be noted that the masterplan presented is indicative only and would be subject to further refinement through consultation and an iterative design and assessment process involving a range of technical disciplines.

1.4. Assumptions and Limitations

The Appraisal provides a proportionate study to assess the suitability of the Site for residential development and make recommendations for the design of the proposed

June 2020

Land South of Lower Rainham Road, Gillingham

development at this initial promotional stage. It does not present a full Landscape and Visual Impact Assessment (LVIA) and Cultural Heritage Impact Assessment which may be necessary in support of any future planning application.

The Appraisal makes reference to biodiversity and access matters to inform a wider appreciation and understanding of the Site and its landscape context. However, a detailed ecological survey, or review of biodiversity records, Tree Preservation Orders and Definitive Rights of Way mapping have not been undertaken at this stage.

Furthermore, the Appraisal does not consider the strategy for growth across the District or issues to do with the supply and demand for new housing.

The baseline and consideration of the effects of development makes reference to the Site and its surrounding context at June 2020.

June 2020

Land South of Lower Rainham Road, Gillingham

2.0 Landscape and Visual Appraisal

2.1. Approach to the Appraisal

The methodology used for the landscape and visual appraisal (LVA) is informed by good practice guidance including Natural England's 'Approach to Landscape Character Assessment' (2014) and 'Guidelines for Landscape and Visual Assessment' (3rd Edition, 2013) produced by the Landscape Institute and Institute of Environmental Management and Assessment.

The Appraisal has been informed by a desk study of the relevant planning policy, guidance documents, and mapping data; and field study (undertaken in June 2020 by a qualified landscape professional) to confirm the Site characteristics, understand the local context and inform decisions about the masterplanning of new development in this location.

2.2. The Site and Study Area

Refer to Figure 1: Site Location and Study Area

The Site includes four main parcels of land. For ease of reference, these are identified as 'Parcels A-D'.

With reference to the ZTV study and site visit, a study area extending to 3km from the Site boundary has been judged sufficient to assess the suitability of the Site for residential development of this nature and scale.

The study area comprises the Site and immediate context which includes the River Medway to the north; Motney Hill/Horsham Marshes and Rainham to the east; and much of the urban area of Gillingham/Twydall to the south and west.

2.3. Baseline Conditions

2.3.1. Planning Policy Overview

Relevant extracts from the National Planning Policy Framework (NPPF) are included at **Appendix 1**.

The Site is not currently allocated for development within the adopted Local Plan.

The Site and surrounding area do not appear to be subject to an emerging or adopted Neighborhood Plan and/or Area Action Plan.

Local planning policies are contained within the Medway Local Plan (Adopted 14 May 2003²) and those relevant to landscape and visual matters are set out in full in the section below.

² Once adopted the Medway Local Plan (2019 to 2037) will replace the 2003 Medway Local Plan

June 2020

Land South of Lower Rainham Road, Gillingham

The Site falls entirely within a locally designated 'Area of Local Landscape Importance' (ALLI) which covers an area of landscape extending between the northern edge of Gillingham and River Medway.

To the north of the Site, the Medway marshes and creeks are designated as the North Kent Marshes Special Landscape Area (SLA).

2.3.2. Landscape Policy

Chapter 2: Strategy

Policy S1: Development Strategy

"The development strategy for the plan area is to prioritise re- investment in the urban fabric. This will include the redevelopment and recycling of under-used and derelict land within the urban area, with a focus on the Medway riverside areas and Chatham, Gillingham, Strood, Rochester and Rainham town centres.

Land use and transport will be closely integrated, and priority will be given to a range of new and improved transport facilities, including facilities for walking, cycling and public transport. Strategic economic development provision will be made both within the urban area and at Kingsnorth and Grain.

In recognition of their particular quality and character, long-term protection will be afforded to:

(i) areas of international, national or other strategic importance for nature conservation and landscape;

and

(ii) the historic built environment, including the Historic Dockyard, associated sites and fortifications.

Outward peripheral expansion onto fresh land, particularly to the north and east of Gillingham, will be severely restricted. The open heartland of Medway at Capstone and Darland will be given long-term protection from significant development."

Policy S4: Landscape and Urban Design

"A high quality of built environment will be sought from new development, with landscape mitigation where appropriate. Development should respond appropriately to its context, reflecting a distinct local character."

Chapter 3 The Built and Natural Environment

Policy BNE1: General Principles for Built Development

"The design of development (including extensions, alterations and conversions) should be appropriate in relation to the character, appearance and functioning of the built and natural environment by:

(i) being satisfactory in terms of use, scale, mass, proportion, details, materials, layout and siting; and

(ii) respecting the scale, appearance and location of buildings, spaces and the visual amenity of the surrounding area; and

(iii) where appropriate, providing well structured, practical and attractive areas of open space."

June 2020

Land South of Lower Rainham Road, Gillingham

Policy BNE5: Lighting

“External lighting schemes should demonstrate that they are the minimum necessary for security, safety or working purposes. Development should seek to minimise the loss of amenity from light glare and spillage, particularly that affecting residential areas, areas of nature conservation interest and the landscape qualities of countryside areas.”

Policy BNE6: Landscape Design

“Major developments should include a structural landscaping scheme to enhance the character of the locality. Detailed landscaping schemes should be submitted before development commences and should have regard to the following factors:

- (i) provide a structured, robust, attractive, long term, easily maintainable environment including quality open spaces, vistas and views; and*
- (ii) include planting of a size, scale and form appropriate to the location and landform, taking account of underground and overground services; and*
- (iii) include details of the design, materials and quality detailing of hard works elements such as gates, fences, walls, paving, signage and street furniture; and*
- (iv) retain important existing landscape features, including trees and hedgerows, and be well related to open space features in the locality; and (v) support wildlife by the creation or enhancement of semi-natural habitats and the use of indigenous plant material where appropriate; and*
- (vi) include an existing site survey, maintenance and management regimes and a timetable for implementation.”*

Policy BNE25: Development in the Countryside

“Development in the countryside will only be permitted if:

- (i) it maintains, and wherever possible enhances, the character, amenity and functioning of the countryside, including the river environment of the Medway and Thames, it offers a realistic chance of access by a range of transport modes; and is either;*
- (ii) on a site allocated for that use; or (iii) development essentially demanding a countryside location (such as agriculture, forestry, outdoor or informal recreation); or*
- (iv) a re-use or adaptation of an existing building that is, and would continue to be, in keeping with its surroundings in accordance with Policy BNE27; or*
- (v) a re-use or redevelopment of the existing built-up area of a redundant institutional complex or other developed land in lawful use; or*
- (vi) a rebuilding of, or modest extension or annex to, a dwelling; or*
- (vii) a public or institutional use for which the countryside location is justified and which does not result in volumes of traffic that would damage rural amenity.*

The countryside is defined as that land outside the urban and rural settlement boundaries defined on the proposals map.”

June 2020

Land South of Lower Rainham Road, Gillingham

Policy BNE22: Special Landscape Areas

“Development within the North Downs and the North Kent Marshes special landscape areas, as defined on the proposals map, will only be permitted if:

- (i) it conserves and enhances the natural beauty of the area’s landscape; or*
- (ii) the economic or social benefits are so important that they outweigh the county priority to conserve the natural beauty of the area’s landscape.*

Policy BNE34: Areas of Local Landscape Importance

“Within the Areas of Local Landscape Importance defined on the Proposals Map, development will only be permitted if:

- (i) it does not materially harm the landscape character and function of the area; or*
- (ii) the economic and social benefits are so important that they outweigh the local priority to conserve the area’s landscape.*

Development within an Area of Local Landscape importance should be sited, designed and landscaped to minimise harm to the area’s landscape character and function.”

Policy BNE43: Trees on Development Sites

“Development should seek to retain trees, woodlands, hedgerows and other landscape features that provide a valuable contribution to local character.”

Policy BNE47: Rural Lanes

“Development served by, and/or affecting, the important rural lanes defined on the proposals map will only be permitted where there is no adverse effect upon the value of the lane in terms of its landscape, amenity, nature conservation, historic or archaeological importance.

Where alterations to the carriageway definition or boundaries of rural lanes is necessary, the use of natural, locally distinctive materials such as grass banks, stone setts and hedging will be required. The use of urbanising features such as raised concrete kerbstones, fencing and walls should be avoided unless these are absolutely essential for structural or safety reasons.”

Chapter 7 Leisure

Policy L4: Provision of Open Space in New Residential Developments

“Where there is a proven deficiency, residential development proposals shall make open space provision, within an agreed timescale, in accordance with the following:

- (i) residential development likely to be occupied by 100 people or more shall include well located local open space for formal recreation on-site at a standard equivalent to 1.7 hectares per 1,000 population and open space for children’s play and casual recreation on-site at a standard equivalent to 0.7 hectares per 1,000 population. Provision of some or all of the formal open space off-site or the improvement or extension of an existing off-site facility will be permitted where the council is satisfied that this would be a better alternative;*
- (ii) residential developments likely to be occupied by between 50 and 100 people should include well located local open space for children’s play and casual recreation on-site at a standard equivalent to 0.7 hectares per 1,000 population;*

June 2020

Land South of Lower Rainham Road, Gillingham

(iii) in small residential developments likely to be occupied by less than 50 people, contributions will be sought towards the provision of children's play and casual recreation which is fairly and reasonably related in scale and kind to the development proposal. Such contributions will only be sought where provision can be made in a location close to, and easily accessible from, the development and would be of direct benefit to the occupiers.

Play provision should incorporate facilities based on the hierarchy set out in Table 1.

Where the existing formal open space provision in the vicinity exceeds the N.P.F.A. minimum requirement for outdoor play space, an informal open space element will be sought on-site in lieu, applying the same standard.

In the case of sheltered housing and special needs housing for the elderly, formal open space and children's play/casual space will not be required. Informal open space provision will be sought on-site in lieu of the formal open space requirement."

Policy L10: Public Rights of Way

"Development which would prejudice the amenity, or result in the diversion or closure, of existing public rights of way will not be permitted, unless an acceptable alternative route with comparable or improved amenity can be provided."

2.3.3. Landscape Designations

Refer to Figure 2: Landscape Designations

Various local designations provide an indication of the value attributed the areas of local landscape and townscape and features/elements.

North Kent Marshes Special Landscape Area

North of the Site, areas of the River Medway and adjacent mudflats are designated as the North Kent Marshes Special Landscape Area (SLA). The preamble to Policy BNE33 records that the Council "...will aim to protect the natural beauty of these areas. Development which undermines this aim will only be considered if significant social or economic benefits would result". It adds that "...these social or economic benefits would be expected to have a countywide significance."

Area of Local Landscape Importance

The Site is located within an Area of Local Landscape Importance (ALLI). The preamble to Policy BNE34 records that these are "...areas of landscape that enhance local amenity and environmental quality, providing an attractive setting to the urban area and surrounding villages."

The Site is in the Gillingham riverside ALLI which is described as "...a rural landscape of orchards and arable fields with country lanes. Situated to the north of Rainham and Twydall, adjacent to the River Medway. Medway Towns Northern Relief Road forms the western boundary."

With reference to the function of the ALLI, the preamble adds that it:

"Forms an important green buffer separating the built-up areas of Twydall and Rainham from areas of international importance for nature conservation and recreation along the Medway estuary.

June 2020

Land South of Lower Rainham Road, Gillingham

Enhances the setting of the Medway Towns Northern Ring Road on the western boundary, and allows attractive views from the river and railway.

Provides residents within an extensive urban area with access to an attractive, rural landscape.

Provides an attractive setting to the Lower Rainham and Lower Twydall conservation areas.

Contains a number of orchards, mature hedgerows and farm groups complementing and contributing to the Riverside Country Park.

Forms a green backdrop when viewed from the Medway Estuary."

Rural Lanes

To the west of Parcel A and defining the northern boundary of Parcel B and southern boundaries of Parcels C and D, Grange Road is designated as a Rural Lane. The preamble to Policy BNE47 records that rural lands are of the “..highest physical landscape, amenity, nature conservation and historic value”.

2.3.4. Landform and Landscape Fabric

Refer to Figure 3: Topography and Figure 4: Provisional Agricultural Land Classification

The Site occupies a tract of land (generally below 30m AOD) running parallel to the shoreline of the River Medway. Towards the southern extent of the study area, the land rises to a ridge at approximately 109m AOD.

The Site itself is relatively flat, sloping from the south-west to the north-east across gentle gradients, from approximately 17m above ordnance datum (AOD) to 8m AOD along the B2004. A localised high point is located at the former chalk pit that has been infilled which rises to approximately 25mAOD.

Analysis of Ordnance Survey mapping, aerial photography and field survey has identified that there is a consistent pattern of fields and routeways that run perpendicular to the shoreline and principal route of the B2004. Lower Twydall is a linear settlement that follows the general south-west to north-east alignment represented by Lower Twydall Lane.

As illustrated on Figure 4, the Provisional Agricultural Land Classification defines the site and surroundings as Grade I agricultural land, albeit this has not been confirmed through a more localised agricultural land classification study at this stage.

There are no Ancient Woodlands within the Site.

At this stage it has not been possible to identify if any of the trees within the Site are under a Tree Preservation Order or would be regarded as Veteran Trees. Other landscape features within the Site are well represented locally and none are judged to be of specific value or importance.

Furthermore, no areas of the Site are designated for their wildlife value/ecology. To the north of the Site, extensive areas of the Medway and intertidal areas are designated as part of the Medway Estuary and Marshes RAMSAR/SSSI/SPA which are notable for the complex of habitats including salt marsh and mud flats, internationally important populations of wintering and passage birds and assemblage of plant species.

June 2020

Land South of Lower Rainham Road, Gillingham

A brief overview of land use and land cover within each of the four Site Parcels is presented below:

- Parcel A (18.4ha) is predominantly in arable use with the exception of a former chalk pit which is now capped and grassed over, and tree belts. The boundaries of Parcel A are generally well defined by established hedgerows. A narrow hedge lined road provides access to the former chalk pit from the B2004.
- Parcel B (1ha) is a small area of grassland/pasture, with poorly defined boundaries.
- Parcel C (8ha) is a single arable field. The boundaries are formed by mature hedgerows which are low and gappy in places.
- Parcel D (2.6ha) is a series of horse paddocks and includes a stable building. The boundaries are defined by established hedgerows and an area of woodland to the west.

2.3.5. Landscape Character

Refer to Appendix 2: Landscape Character Assessment Extracts

Within the context of the National Landscape Character Assessment and Landscape Assessment of Kent, local landscape character is described in the Medway Landscape Character Assessment (March, 2011).

The Site is located fully within the **Lower Rainham Farmland Landscape Character Area (LCA)**.

The characteristics of the LCA are described as follows:

- *“Flat, small to medium scale mixed farmland – orchards, arable, rough grazing*
- *Neglected pockets of land and busy road gives transitional urban fringe character to area; gradual trend towards suburbanisation (e.g. boundary features) in some localised areas*
- *Some well managed areas of orchard, shelterbelt, farm buildings, cottages and distinctive rural hedgebanks*
- *Tranquil in many parts despite enclosure by road to north and rail to south*
- *Poor accessibility – east/west and north/south links to urban areas*
- *Recent urban extension to north west of Otterham - Quay Lane now divides this character area and diminishes coherence; area to east beyond Rainham has particularly detracting urban and industrial features – including industrial estate, tip with vents and railway line; golf course to north along Swale boundary*
- *Includes small conservation areas/hamlets at Lower Rainham and Lower Twydale*”

The Analysis for this LCA records:

“Condition Moderate

- *Pattern of elements – Variable*
- *Detracting features – Some*
- *Visual Unity – Interrupted*
- *Ecological integrity – Moderate*

June 2020

Land South of Lower Rainham Road, Gillingham

- *Cultural integrity – Variable*
- *Functional integrity – Moderate*

Sensitivity Moderate

- *Distinctiveness – Distinct*
- *Continuity – Historic*
- *Sense of place – Moderate*
- *Landform – Apparent*
- *Tree cover – Intermittent*
- *Visibility – Moderate*

Actions Conserve and Create”

The LCA description also identifies ‘Issue’, ‘Guidelines’ and ‘General Notes’ all of which are presented below in full:

Issues

- *“Value of area as green corridor linking community in urban areas to countryside and role as extended buffer to Country Park and Natura 2000/Ramsar protected coastline*
- *Consideration of the integral links between this character area and the Riverside Marshes character area*
- *Potential to restore traditional orchards; strengthen and enhance biodiversity opportunities; introduce more positive land management systems; respect for historic characteristics (see General Notes)*
- *Poor condition of some farmland areas, tendency towards fragmentation and trend towards urban fringe activities and weakened coherence*
- *Grade 1 agricultural soil classification*
- *Threat of expansion to urban edges on south and west sides, along with gradual, pervasive erosion of rural character”*

Guidelines

- *“Restore neglected and abandoned fields to appropriate and sensitive rural land uses – e.g. orchard, woodland, pasture and arable farming; seek to reverse decline in condition of landscape and reinforce rural characteristics*
- *Improve east/west footpath links between Gillingham and open countryside and footpath links from Twydall*
- *Introduce regular management of hedgerow boundaries (particularly along rural lanes)*
- *Discourage conifer planting and other forms of creeping suburbanisation – e.g. inappropriate fencing, gates, ornamental planting*
- *Resist further built development and introduce more positive landscape management systems*

June 2020

Land South of Lower Rainham Road, Gillingham

- *Consider this area integrally with Riverside Marshes character area for its integral value as a green buffer, wildlife corridor and link to wider countryside”*

General Notes

- *“There is considerable variation in the condition of this character area, with some pockets in serious decline and other well managed and cared for areas; area between Lower Rainham and Lower Twydall in generally good condition with urban influences less apparent; area to the east beyond the Rainham urban extension in particularly poor condition with urban fringe and amenity land uses detracting from rural character. Area has high levels of visibility along coastline; inland areas more secluded and screened from views*
- *There are a number of benefits attached to this area retaining its essentially rural character. It provides a valuable green buffer separating the built up areas of Twydall and Rainham from valuable and internationally protected wildlife sites along Medway estuary; it offers openness and easy access to a countryside area for an extensive urban population; it improves the setting of the A289 along its eastern boundary and provides attractive open views across the marshes and farmland from the railway line and main road; it also improves the setting of the Lower Rainham and Twydall Conservation areas; along with the Riverside Marshes area it provides a distinctive green backdrop when viewed from the Medway estuary*
- *Historic note. This area has potential for greater understanding of how the marshes and farmland operated as a system and what impact this had for landscape character and the location of settlements. Grange Farm is a major medieval moated site and also had significant Roman archaeology. Along this edge we can anticipate a series of Roman if not earlier estates that are located on creeks between the river and the road network. Important to see movement by water as part of the landscape organisation.”*

Immediately to the north of the Site is the **Riverside Marshes LCA**.

Its characteristics are described as follows:

- *“Strip of marshland rising gently to farmland and stretching from southern coastal edge of Medway estuary to Lower Rainham Road*
- *Strong industrial influences at Kingsnorth and Motney Hill; B2004 introduces urban influence*
- *Diverse land uses – scrub, orchards, small fields, equine related; area fragmented and lacks overall sense of coherence; land in poor condition around former equestrian centre at western end*
- *Saxon Shore way forms strong east/west link along sea wall; weaker north south links*
- *Several salt marsh areas add to distinctive character along estuary*
- *Much of area owned by Medway Council and managed as country park with Visitor Centre and Car Park – introduces amenity element rather than distinctly rural character*
- *Country Park designation (2003) extends to most of this character area*
- *Forms important buffer to urban edge of Gillingham, protects Natura 2000/Ramsar sites, valuable recreational and biodiversity resource, green corridor from countryside into urban area; integrally linked with Lower Rainham Farmland character area*

June 2020

Land South of Lower Rainham Road, Gillingham

- *Historic features – includes Black House – small medieval grade 2 listed building to south of Visitor Centre in poor state of repair; strong industrial character remains from former uses – quays, cement works etc; includes several evocative hulks and other remains on the intertidal flats*
- *Long views and open character in views out to estuary from sea wall; stronger sense of enclosure to interior; provides good vantage point to view wider estuary including late 19th century artillery forts (Hoo and Darnet – scheduled monuments). Also views of industrial, energy and port infrastructure”*

The Analysis for this LCA records:

“Condition Moderate

- *Pattern of elements – Variable*
- *Detracting features – Some*
- *Visual Unity – Interrupted*
- *Ecological integrity – High*
- *Cultural integrity – Variable/Poor*
- *Functional integrity – Moderate*

Sensitivity Moderate

- *Distinctiveness – Distinct*
- *Continuity – Historic*
- *Sense of place – Moderate*
- *Landform – Apparent*
- *Tree cover – Intermittent*
- *Visibility – Moderate*

Actions Conserve and Create”

The LCA description also identifies ‘Issue’, ‘Guidelines’ and ‘General Notes’ all of which are presented below in full:

Issues

- *“Urban fringe degradation and threats to loss of distinctive character*
- *Sensitivity of marshes as covered by Natura 2000/ Ramsar designation*
- *Role as buffer to marshland wildlife habitats; introduction of new natural features*
- *Green corridor, footpath and National Cycle route linking community in urban areas to countryside; weaker north south links*
- *Strong connections with Lower Rainham Farmland character area to south and overall role of two character areas as generous buffer and corridor separating urban areas from natural spaces of estuary*

June 2020

Land South of Lower Rainham Road, Gillingham

- *Condition of farmland areas; land use proposals – e.g. re-introduction of orchards, new pond areas, improved visitor facilities*
- *Future plans for Riverside Country Park as recreational, educational and wildlife resource*
- *Historic character of the marshes and waterfront*
- *Protection and enhancement of salt marsh areas*
- *Creeping urbanisation in signage (especially EA signs) and other features”*

Guidelines

- *“Introduce positive land management that addresses future plans for country park*
- *Reflect historic character of the marshes within interpretation of the country park*
- *Balance potential conflicts between educational, recreational and wildlife interests*
- *Ensure new development proposals protect area from adverse visual and landscape character impacts*
- *Introduce more active management of farmland, including reintroduction of orchards, to reinforce sense of working landscape; improve roadside verges and grassland areas with native species planting (hedgerows and native wildflower mixes)*
- *Seek to manage signage and other features to strengthen and reinforce rural character*
- *Improve habitat, access, recreation opportunities; improve access for urban communities to estuary – strengthen north-south footpath links towards urban areas at Twydall and Rainham*
- *Area has key role as gateway into Medway; linking urban areas and countryside and as interface between estuary and orchards of North Kent Fruit Belt*
- *Include preservation and interpretation of Black House alongside other development plans for Country Park”*

2.3.6. Access and Recreation

Refer to Figure 5: Access and Recreation

With reference to 1:25,000 scale Ordnance Survey mapping and green space data, the Site contains no formally defined public open spaces.

Furthermore, the Site is not publicly accessible and no footpath or bridleway routes cross any of the land Parcels. Whilst undertaking field survey no permissive routes were identified crossing or entering the Site.

A railway footbridge is located to the south of the Site, along Lower Twydall Lane, and provides a pedestrian connection between Gillingham and Lower Twydall. Ordnance Survey 25k mapping indicates that Lower Twydall Lane (from the railway line footbridge crossing to the northern end of the settlement) is defined as an ‘Other Route with Public Access’.

North of the B2004 is the Riverside Country Park, which extends across 100ha between Gillingham and Rainham. The site includes the Motney Hill and Berengrave Local Nature Reserve and comprises various habitats including mudflats, salt marsh, ponds, reedbeds and grassland.

June 2020

Land South of Lower Rainham Road, Gillingham

Vehicular and pedestrian access to the Riverside Country Park is via a number of 'lanes' connecting from the B2004. From east to west, there is an informal pedestrian access along Cowstead Lane, opposite Pump Lane; formal vehicular and pedestrian access is opposite Parcel A; a vehicular and pedestrian access along Sharps Green, opposite Lower Twydall Lane; and there is an informal pedestrian access opposite Eastcourt Lane.

There are also a number of permissive routes through the Country Park, including routes that cross the area of publicly accessible woodland close to Walnut Tree Farm.

To the north of the site, along the southern shoreline of the River Medway and within the Country Park, is the Saxon Shore Way Recreational Route. National Cycle Route 1 follows the same alignment along the shoreline.

2.3.7. Views and Visual Amenity

Refer to Figure 6: Zone of Theoretical Visibility Study and Viewpoint Locations and Figure 7: Photograph Panels

Views from within the Site

From within the site, views are relatively contained due to the screening effects of vegetation around the perimeter of each of the land parcels.

From within Parcel A views are generally well contained by mature/tall boundary hedgerows and the internal boundary vegetation along the track to the chalk pit. To the north-west corner of the Parcel there are views of existing to built development along Lower Rainham Road and to the south-west corner there are view of built development at Lower Twydall. A notable view is possible from the former chalk pit where the elevated position allows views north towards the River Medway.

From within Parcel B there are views north above relatively low boundary vegetation across Parcel C and beyond to the River Medway above intervening vegetation. There are also relatively open views east towards Lower Twydall. Views south and west are generally contained by boundary vegetation and surrounding woodland planting.

From within Parcel C there are more open views to the north due to low/gappy vegetation and limited built development along the Site boundary with Lower Rainham Road. Within the northern part of the Site, views north are of the adjoining field and the River Medway is largely screened by vegetation within the Riverside Country Park. However, in the southern part of the Site, there are views across the River Medway above intervening vegetation. To the south of Parcel C, views are generally contained by the hedgerow along Grange Road, however, there are views above the intervening vegetation to Lower Twydall. To the east and west of Parcel C, views are generally contained by buildings/hedgerows along Lower Twydall Lane/Eastcourt Lane.

From with Parcel D views are generally contained by surrounding vegetation and buildings. This includes buildings at the junction of Lower Rainham Road/Eastcourt Lane to the north; boundary hedgerows either side of the Eastcourt Lane to the east; houses along Grange Road to the south; and woodland to west.

June 2020

Land South of Lower Rainham Road, Gillingham

Views towards the Site

A Zone of Theoretical Visibility (ZTV) Study has been prepared to indicate where proposed development may be visible from within the surrounding landscape. Buildings heights within the site have been modelled at 8.5m, 10.5m and 12m (indicative of residential buildings that are 2, 2.5 and 3 storeys high).

The analysis was carried out using a topographic model including settlements and woodlands (with heights derived from NEXTMAP 25 surface mapping data) as visual barriers in order to provide a more realistic indication of potential visibility. It should be noted that The ZTV model was generated by placing built development within the full extent of the Site, and as such it is not representative of the potential visibility of the development proposal as illustrated on the Indicative Concept Masterplan.

The ZTV study indicates wide-spread theoretical visibility of built development within its immediate landscape context, and extending north across the River Medway. Theoretical visibility is also relatively widespread in areas immediately to the east (up to approximately 4km from the Site). To the south-east and south of the Site, the ZTV indicates that theoretical visibility would be very limited and restricted to sporadic views from some open spaces and streets orientated towards the Site. Limited areas of theoretical visibility are also shown towards the fringes of the study area at Hartlip.

The ZTV represents a theoretical model of the potential visibility. In reality, landscape features such as trees, hedgerows, embankments, and / or buildings not accounted for within the modelling, are likely to combine to limit visibility to a much greater degree. As such field work has been undertaken to test and confirm the extent of potential visibility arising from residential development within the Site.

Photographic panoramas are presented to illustrate the nature of views from several locations referenced in the summary below.

To the north, from along the B2004 as it passes the Site, views are generally filtered by intervening boundary vegetation and / or buildings along the road corridor. The most visible part of the Site is Parcel C where the boundary hedgerow is relatively low and gappy in places. The entrance to the former chalk pit (within Parcel A) is also visible from along the Lower Rainham Road, but views into Parcel A itself are largely screened by vegetation.

Further north, from within the Riverside Country Park, and along the Saxon Shore Way, the Site is not generally visible due to intervening vegetation within the Riverside County Park and along the foreshore of the Medway Estuary (as illustrated by Viewpoints 1 - 3).

To the north-west of the Site, from within the area of publicly accessible woodland (close to Walnut Tree Farm)/adjacent to the Saxon Shore Way (as illustrated by Viewpoint 1), there are no views of the Site due to intervening vegetation. There are relatively open views of Parcel C from along short-section of permissive route that runs to the south of the area of woodland, connecting into the Sharps Green Carpark.

To the north of the Site, from along the causeway towards Horrid Hill there are more open views across the landscape towards Lower Twydall (as illustrated by Viewpoint 2). The Site itself is not clearly visible, however, there are glimpsed views of development along the Lower Rainham Road, notably around the junction with Eastcourt Lane (close to Parcels C

June 2020

Land South of Lower Rainham Road, Gillingham

and D). There are also glimpsed views beyond to the built-up area of Gillingham which sits on higher ground, however, the overriding impression is of a wooded horizon.

To the north-east of the Site, from along the Saxon Shore Way, there are no views of the Site due to intervening vegetation which runs close to the shoreline of the Medway Estuary (as illustrated by Viewpoint 3).

Further to the north-east, from along Saxon Shore Way/Motney Hill Way (as illustrated by Viewpoint 4), there are open views across the Medway Estuary towards Lower Twydall. The Site is not clearly visible due to screening by intervening vegetation and structures. Existing built development is visible in the distance along the Lower Rainham Road; on higher ground around Gillingham; and along the shoreline at The Strand, where there are a number of high-rise buildings. However, at this distance, built development is not a prominent feature in view and the overriding impression is of a wooded horizon.

To the east, when approaching the Site from along the B2004 Lower Rainham Road (as illustrated by Viewpoint 5), the Site is not visible, with intervening vegetation and buildings enclosing the road and screening views.

To the south, when approaching the Site from along Lower Twydall Lane (as illustrated by Viewpoint 6), the majority of the Site is not visible due to the screening effects of intervening vegetation. Moving further north along Lower Twydall Lane, Parcel B becomes more visible due to the relatively low boundary hedgerow. There are also relatively open views into Parcel C from Lower Twydall Lane/Grange Road above the low and gappy field boundary hedgerow, and beyond Parcel C towards the River Medway. There are also views into Parcel A from the junction of Lower Twydall Lane/Grange Road, where this is an existing field gate.

From the footbridge that crosses the railway at the end of Lower Twydall Road, there are no clear views across the Site due to surrounding vegetation. From within Gillingham itself, around Lower Twydall Lane; Beechings Road; and Beechings Playing Fields (as illustrated by Viewpoint 7), there are no views of the Site which is screened by intervening vegetation, landform and buildings. There glimpsed views between buildings to the Riverside Country Park/ coastline and more open views of across the Medway Estuary.

To the west, when approaching the Site from along the B2004 Lower Rainham Road (as illustrated by Viewpoint 8) the Site is not visible with screening by intervening vegetation and buildings. From this location, buildings are visible at the junction of Lower Rainham Road and Eastcourt Lane (close to Parcels C and D).

When approaching the Site from Grange Road (as illustrated by Viewpoint 9) the Site is not generally visible, however, the southern boundary of Parcel D can be seen. Moving further east along Grange Road, Parcel D becomes more visible due to its relatively low boundary hedgerow is visible and there are relatively open views across Parcel D from along the southern Site boundary.

Beyond the 3km Study Area, consideration has been given to views from the Saxon Shore Way / coastline around Hoo (as Illustrated by Viewpoint 10). From this location there are open and expansive views across the River Medway and towards the Riverside Country Park. Existing built development is visible in the distance along the shoreline, however, the Site itself is not clearly discernible.

June 2020

Land South of Lower Rainham Road, Gillingham

2.4. Potential Effects and Recommendations

2.4.1. Introduction

This section of the appraisal considers the potential landscape and visual effects arising from development of the type proposed. The assessment of effects is based on the current baseline, i.e. excluding the proposed development of approximately 1,250 residential units on land to adjacent to Pump Lane (Outline Planning Application MC/19/1566) and other areas in proximity that have been allocated for development

Measures that have been adopted in the Outline Masterplan to mitigate adverse landscape and visual effects are noted, along with other measures that deliver localised enhancement to the landscape and how it is accessed and enjoyed.

2.4.2. Landscape Designations

	Nature of Effects	Measures to mitigate adverse effects and deliver localised enhancements
North Kent Marshes Special Landscape Area	Development is unlikely to result in any adverse effects on the intrinsic character, qualities or natural beauty of the North Kent Marshes Special Landscape Area.	N/A
Area of Local Landscape Importance	<p>New built development will result in the loss of an area designated as an Area of Local Landscape Importance (ALLI).</p> <p>The character and function of the wider area designated as an ALLI as a green buffer separating the built-up areas of Twydall and Rainham from the Medway Estuary would be retained, with relatively localised adverse effects.</p> <p>Some views from the railway would be affected by new development. It is unlikely that views from the river would be affected.</p> <p>Furthermore, the areas function as a green backdrop in views from the Medway</p>	<p>No landscape features of notable value or that are rare or distinctive locally, such as orchards or rural lanes would be lost, although areas currently under arable and pastoral land uses and some stretches of hedgerows would be removed.</p> <p>Key features of the local landscape, notably hedgerows and trees around the perimeter of the Site, would be retained and enhanced.</p> <p>The proposals include for the provision of orchards that were at one time much more common in this landscape.</p> <p>The proposals provide new access to areas currently not accessible to local residents and visitors.</p>

June 2020

Land South of Lower Rainham Road, Gillingham

	Estuary would be largely unaffected. Where there are more open views from within the River Medway towards Lower Tywdall / Gillingham, there would remain the impression of a wooded horizon.	A green buffer seeks to retain the immediate setting of the Lower Tywdall Conservation Area.
Rural Lanes	Residential development is proposed adjacent to a stretch of Grange Road that is designated as a Rural Lane. The Rural Lane would not be severed.	The hedgerow along Grange Road will be retained with new tree planting and gapping up to enhance its green character and wildlife value. The proposals seek to maintain the rural qualities of the rural lane where possible by offsetting the edge of built development. There is potential for a stretch of the Rural Lane east of properties at the junction of Eastcourt Lane and Grange Road to be for cyclists and pedestrians only, with vehicular traffic diverted into the proposed development which will enhance its character and amenity value adjacent to the Lower Tywdall Conservation Area.

2.4.3. Landform and Landscape Fabric

	Nature of Effects	Measures to mitigate adverse effects and deliver localised enhancements
Landform/landscape fabric	There would be localised modifications to landform, largely during the construction phase to store soils. The gently sloping character of the Site would be largely unaffected as would the more elevated vantage point within the former chalk pit	No significant earthworks are proposed and the gently sloping topography of the Site would be retained, with localised changes to accommodate sustainable drainage features. The configuration of the proposed development, retained hedgerows around the perimeter of the site and along the access road to the former chalk pit and

June 2020

Land South of Lower Rainham Road, Gillingham

	<p>which is retained as public open space.</p> <p>Small modifications to the landform would be required to accommodate sustainable drainage features.</p> <p>Hedgerows and trees around the perimeter of the Site would be retained and enhanced, although some short stretches may need to be removed to provide access.</p> <p>Hedgerows and trees within the site would be retained where they fall within areas of public realm and or/form part of the green infrastructure network, such as around the former chalk pit and access off the B2004. Any trees removed would be able to be replaced as part of new tree planting/landscaping.</p> <p>There would be the loss of loss of agricultural land which is well represented locally.</p>	<p>retained Lower Twydall Lane follow the general grain of the landscape orientated south-west to north-east.</p> <p>Retained hedgerows would be subject to long term management to enhance their character, screening function and biodiversity interest.</p> <p>Significant new planting, including trees, is proposed.</p> <p>The masterplan makes provision for accessible productive landscape such as community orchards. Orchards were at one time characteristic of this area and as such the proposals make provision to enhance this important local landscape feature.</p>
--	---	---

2.4.4. Landscape Character

	Nature of Effects	Measures to mitigate adverse effects and deliver localised enhancements
Lower Rainham Farmland LCA	<p>Effects on landscape character would be relatively localised and limited to the Site and its immediate context.</p> <p>Development would introduce built development to areas that are currently under agricultural land use. However, built development</p>	<p>Several of the objectives set out in the guidelines for the Lower Rainham Farmland LCA can be delivered as part of the proposed development, notably:</p> <ul style="list-style-type: none"> - The creation of new orchards - Improved footpath links around Lower Twydall

June 2020

Land South of Lower Rainham Road, Gillingham

	<p>of the scale and type proposed is a feature of the local area.</p> <p>The rural character of the wider LCA would be retained and its function as a green buffer between Twydall and Rainham from the Medway estuary and as a green backdrop would be largely retained.</p>	<p>and linking to the Riverside Country Park</p> <ul style="list-style-type: none"> - Management of hedgerow boundaries including along rural lanes - Enhanced wildlife corridors linking to the Riverside Marshes LCA.
Riverside Marshes LCA	There would be very limited effects on the character of the Riverside Marshes LCA	N/A

2.4.5. Views and Visual Amenity

	Nature of Effects	Measures to mitigate adverse effects and deliver localised enhancements
Views from within the Site	There is no public access to the site, and as such no publicly accessible vantage points would be affected.	The elevated vantage point which is located in the former chalk pit from where views north to the River Medway are possible will be retained and form part of a public open space.
Views from the North	<p>From along Lower Rainham Road (and the dwellings this route) there will be relatively short distance views of the proposed development in Parcel A and C, however, the majority of the built development will be screened from view. Built development is not uncharacteristic feature along Lower Rainham Road and the route is generally already well contained by buildings and vegetation.</p> <p>Further north there will generally be no open views of development from within the</p>	The proposed development should be designed to create a positive frontage along Lower Rainham Road that relates well to existing built form. Existing boundary features should be retained, enhanced and integrated into the layout of the development in order to provide some screening / filtering of views. Careful consideration should be given to building heights to ensure the proposed development is not visually prominent, however, some variety in scale and massing will provide interest and is fully consistent with the existing varied built form along this route.

June 2020

Land South of Lower Rainham Road, Gillingham

	<p>Riverside Country Park / along the Saxon Shore Way.</p> <p>Where there are more open views from within the Medway Estuary towards Lower Tywdall / Gillingham, the proposed development would not be a prominent feature in view; would not break the skyline; and there would remain the impression of a wooded horizon.</p>	
Views from the East	<p>The proposed development will not generally be visible in views to the east due to intervening vegetation, landform and buildings. Where there are more open views along the River Medway, the proposed development would not be a discernible feature in view.</p>	Retain and enhance boundary vegetation.
Views from the South	<p>From along Lower Tywdall Lane (and dwellings along the northern edge of Lower Tywdall/Conservation Area) there will be relatively short distance views of the proposed development in Parcel A to the north-east and C to the north-west.</p> <p>From Grange Road there will also be relatively short distance view of the proposed development within Parcel C and D, and this may disrupt longer distance views across the Medway Estuary.</p>	<p>Parcel B will be kept free from development and will provide a informal public open space for the local community.</p> <p>The proposed development in Parcel A will be set back from Lower Tywdall and new green infrastructure (potentially including orchards) created closest to the existing settlement. This will provide a degree of screening and will help retain the separate identity of the village. Careful consideration should be given to building heights to ensure the propose development is not visually prominent.</p> <p>The proposed development in Parcel C and D will also be set back from Grange Road, allowing for existing boundary vegetation to be retained and potentially</p>

June 2020

Land South of Lower Rainham Road, Gillingham

		incorporating a new east-west pedestrian and cycle route. Again careful consideration should be given to building heights to ensure the proposed development is not visually prominent, and where possible views through Parcel C should be created to allow provide some degree of visibility with the Medway Estuary.
Views from the west	The proposed development will not generally be visible in views to the west due to intervening vegetation, landform and buildings. Where there are views along Grange Road / Lower Rainham Road existing boundary vegetation will generally screen the proposed development.	Retain and enhance boundary vegetation.

2.4.6. Access and Recreation

	Nature of Effects	Measures to mitigate adverse effects and deliver localised enhancements
Public Rights of Way, Long Distance Footpaths and Cycling Routes	No public rights of way or cycling routes would be affected by the proposed development.	A range of new pedestrian and cycle friendly routes are proposed, including routes linking Twydall/Lower Twydall to new open spaces within the proposed development and to the Riverside Country Park.
Parks and Open Spaces	No areas of public open space would be affected by the proposed development.	New areas of open space including formal and informal children's play, sports pitches and community orchards form part of the proposed development.
Riverside Country Park	No effects	The Riverside Country Park is an important local resource and the proposals make provision for improved linkages / connections

June 2020

Land South of Lower Rainham Road, Gillingham

		as part of the proposed development.
--	--	--------------------------------------

June 2020

Land South of Lower Rainham Road, Gillingham

3.0 Heritage Appraisal

3.1. Approach to the Appraisal

The Heritage Appraisal has been informed by a desk study of the key relevant planning policy, guidance documents, desk-based study of available Historic Environment Record information (from the Pump Lane Desk-Based Assessment and online sources including the Exploring Kent's Past website), and a review of the consultee responses to the Pump Lane application.

The ZTV and Viewpoint photo panels have also informed the assessment.

3.2. The Study Area

The 3km study area used for the landscape and visual appraisal has been used as a starting point for identifying designated heritage assets for consideration within the heritage appraisal. However a 1km study area has been deemed sufficient for non-designated assets. This is in line with common practice for identifying impacts on non-designated assets and identifying archaeological potential.

The study area comprises the Site and immediate context including the marshes, creeks and islands to the north. It also includes the built-up areas of Gillingham and Rainham to the west and south.

3.3. Assumptions and limitations

The assessment of any potential changes to the setting of heritage assets has been based on primarily on desk-based resources, and drawing on the desk / field study undertaken in relation to the landscape and visual appraisal. It is acknowledged that this gives only a partial picture of the current setting of these assets, as they will also be experienced in other views not available online. These other views have been identified where possible and a reasoned judgement on the potential visibility of the Site (with reference to the ZTV) has been used in the appraisal.

It has been assumed that the Historic Environment Record information available online and as referenced in the Pump Lane application documents is up to date and that there have been no recent further discoveries within the Site or the study area.

3.4. Planning Policy Overview

3.4.1. Legislation

Scheduled Monuments and Listed Buildings are protected by statute. Legislation regarding Scheduled Monuments is contained within The Ancient Monuments and Archaeological Areas Act 1979. Legislation regarding Listed Buildings is contained in The Planning (Listed Buildings and Conservation Areas) Act 1990. Under this legislation it is an offence to carry out works which affect the fabric of a Scheduled Monument or Listed Building without the prior written consent of the Secretary of State.

The 1979 Act makes no reference to the settings of Scheduled Monuments. However, with regard to Listed Buildings, Section 66 of the 1990 Act states (in part):

June 2020

Land South of Lower Rainham Road, Gillingham

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting”.

The 1990 Act also places a duty on planning authorities with regard to Conservation Areas, requiring that:

“Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.

Schedule 1 of the Hedgerow Regulations 1997 sets out additional criteria for determining “important” hedgerows. These criteria include Archaeology and History criteria, specifically

“1. The hedgerow marks the boundary, or part of the boundary, of at least one historic parish or township; and for this purpose “historic” means existing before 1850.

2. The hedgerow incorporates an archaeological feature which is—

(a) included in the schedule of monuments compiled by the Secretary of State under section 1 (schedule of monuments) of the Ancient Monuments and Archaeological Areas Act 1979(7); or

(b) recorded at the relevant date in a Sites and Monuments Record.

3. The hedgerow—

(a) is situated wholly or partly within an archaeological site included or recorded as mentioned in paragraph 2 or on land adjacent to and associated with such a site; and

(b) is associated with any monument or feature on that site.

4. The hedgerow—

(a) marks the boundary of a pre-1600 AD estate or manor recorded at the relevant date in a Sites and Monuments Record or in a document held at that date at a Record Office; or

(b) is visibly related to any building or other feature of such an estate or manor.

5. The hedgerow—

(a) is recorded in a document held at the relevant date at a Record Office as an integral part of a field system pre-dating the Inclosure Acts(8); or

(b) is part of, or visibly related to, any building or other feature associated with such a system, and that system—

(i) is substantially complete; or

(ii) is of a pattern which is recorded in a document prepared before the relevant date by a local planning authority, within the meaning of the 1990 Act(9), for the purposes of development control within the authority’s area, as a key landscape characteristic.”

No other types of heritage asset are protected or controlled by statute.

3.4.2. National Planning Policy

National Planning Policy in England is set out in the National Planning Policy Framework (NPPF) published in March 2012 and updated in July 2018 and again in February 2019. Policies affecting cultural heritage are set out in section 16 (paragraphs 184-202) of the

June 2020

Land South of Lower Rainham Road, Gillingham

NPPF. The policies in the NPPF are a material consideration that must be taken into account in development management decisions and in development of Local Plans, where relevant. Therefore, the development management policies in the NPPF can be applied directly by the decision-maker when determining whether development should proceed.

The NPPF supports a presumption in favour of sustainable development, and sets out the definitions of sustainability including conserving and enhancing the historic environment. Paragraph 192 of the NPPF states that

“In determining planning applications, local planning authorities should take account of:

- a. The desirability of sustaining or enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation*
- b. The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c. The desirability of new development making a positive contribution to local character and distinctiveness”*

Paragraph 193 states that “great weight” should be given to the conservation of the significance of designated heritage assets and “the more important the asset, the greater the weight should be”. It also states that the weight given to the conservation of a heritage asset is irrespective of the degree of any potential harm to its significance.

Paragraphs 194-197 set out the policy tests for different levels of harm to the significance of heritage assets of differing levels of importance. For designated heritage assets, paragraph 194 states that “any harm to, or loss of” significance requires “clear and convincing justification” and that “substantial harm to or loss of:

grade II listed buildings or grade II registered parks or gardens should be exceptional

assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and world heritage sites, should be wholly exceptional”.*

Paragraph 195 states that proposals leading to substantial harm to designated heritage assets should be refused consent unless it can be demonstrated that the harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or where all the following apply:

- “a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.”*

Where a development proposal would lead to less than substantial harm to a designated heritage asset Paragraph 196 requires that “this harm should be weighed against the public benefits of the proposal”. Similarly, Paragraph 197 states that “In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be

June 2020

Land South of Lower Rainham Road, Gillingham

required having regard to the scale of any harm or loss and the significance of the heritage asset”.

3.4.3. Local Planning Policy

Relevant policies within the existing Local Plan are:

POLICY BNE12: Conservation Areas

“Special attention will be paid to the preservation and enhancement of the character and appearance of Conservation Areas, as defined on the proposals map.”

POLICY BNE14: Development in Conservation Areas

“Development within Conservation Areas, or affecting their setting, should achieve a high quality of design which will preserve or enhance the area’s historic or architectural character or appearance. The following criteria will be applied:

- (i) *materials, features and details of buildings or structures which contribute to the character or appearance of the area should be retained or reinstated; and*
- (ii) *traditional street patterns, building lines, open spaces and urban spaces, paving and roadway materials, boundary treatments and street furniture should be retained or reinstated; and*
- (iii) *the scale, height, mass, roofscape, materials, detailing, fenestration, plot width and depth, and visual appearance of new development should be sympathetic with existing buildings and their settings; and*
- (iv) *trees, hedgerows and open spaces should be retained and protected; and*
- (v) *hard and soft landscape elements and traditional materials which enhance the area should be utilised.*

Proposals should be submitted as full applications when they are within, or would affect, a Conservation Area.”

POLICY BNE18: Setting of Listed Buildings

“Development which would adversely affect the setting of a listed building will not be permitted.”

POLICY BNE20 Scheduled Ancient Monuments

“Scheduled Ancient Monuments are defined on the proposals map. Development affecting Scheduled Ancient Monuments or other nationally important sites will not be permitted if it would: (i) damage or destroy such sites; or (ii) be detrimental to their setting.”

POLICY BNE21 Archaeological sites

“Development affecting potentially important archaeological sites will not be permitted, unless:

- (i) *the developer, after consultation with the archaeological officer, has arranged for an archaeological field evaluation to be carried out by an approved archaeological body before any decision on the planning application is made; and*
- (ii) *it would not lead to the damage or destruction of important archaeological remains. There will be a preference for the preservation of important archaeological remains in situ.*

June 2020

Land South of Lower Rainham Road, Gillingham

- (iii) *where development would be damaging to archaeological remains, sufficient time and resources are made available for an appropriate archaeological investigation undertaken by an approved archaeological body. Such investigations should be in advance of development and in accordance with a specification and programme of work approved by the council. Resources should also be made available for the publication of the results of the investigation.”*

In addition, the Draft Medway Heritage Strategy forms part of the evidence base for the emerging local plan and identifies three key objectives:

- Objective 1: Conserve and enhance Medway’s heritage assets.
- Objective 2: Work with Medway’s heritage assets to help deliver sustainable development.
- Objective 3: Increase the understanding and community involvement with Medway’s heritage assets.

The aim of the strategy is to provide a framework for how Medway will conserve, enhance and enjoy its heritage in the immediate and long term future.

3.5. Baseline Conditions

3.5.1. Historic Landscape Character

The Site lies within the Historic Landscape Type (HCLA) 17 – Northern Horticulture Belt: *“A relatively well-defined area primarily characterised by horticulture activity, predominantly orchards. Situated between a series of major towns which would have supplied substantial markets as well as an extensive road and rail connections for wider distribution.”*

The marshes to the north are within HCLA 28 – Northern Coast and Marshland: *“An extremely well defined area comprising of a relatively balanced mix of reclaimed marsh and coastal landscapes that typifies the relationship between humans and the marine environment, with much of the areas around the Hoo Peninsula containing a greater degree of industrial activity.”*

Areas to the west and south of the study area are within HCLA 32 – Urban Conurbation: *“Well-defined blocks of urban conurbation including areas of industry and recreation that have arisen since 1801, reflecting large-scale population shift and growth, many of which are located along major transportation corridors.”*

3.5.2. Important Hedgerows

Superseded Ordnance Survey mapping records that the eastern boundary of the site was the parliamentary boundary between Grange and Upchurch by 1864. It may therefore be considered as an “important hedgerow” under Part 2 of Schedule 1 of the Hedgerow Regulations. Other hedgerows within the Site may be associated with ancient manor of Grench/Grange (recorded from at least the 13th century the later 17th century manor house known as Grench Manor is a Grade II Listed Building – NHLE1267785) and would therefore also be considered important.

June 2020

Land South of Lower Rainham Road, Gillingham

3.5.3. Designated Heritage Assets

Refer to Figure 8: Heritage Designations

Scheduled Monuments

There are two Scheduled Monuments within 3km of the Site. These are Hoo Fort (NHLE1019643) and Fort Darnet (NHLE1019642), situated on opposite banks of the Medway c.2km north of the Site. These are both Royal Commission fortifications created following the 1859 Royal Commission report on the defence of the United Kingdom as a result of an invasion scare caused by the strengthening of the French Navy. Both were later reused during World War II. They derive significance from their surviving historic fabric (both 19th and 20th century) and from their historic associations.

The pair of fortifications defended the approach to Chatham along the Medway and would have provided overlapping fire. It is this inter-relationship and intervisibility between the two forts which provides the greatest contribution of their setting to their significance. The ZTV predicts that the Site will be visible from both of these monuments, however the Viewpoint photography from Viewpoints 1, 2 and 10 indicate that it will not be readily discernible due to the topography and intervening vegetation.

Listed Buildings

There are a total of 56 Listed Buildings within 3km of the Site. The Church of St Margaret, Rainham (NHLE1267793) is the only Grade I Listed Building; there are two Grade II* Listed Buildings – the Church of St Mary Magdalene, Gillingham Green (NHLE1267814) and Bloors Place, Lower Rainham (NHLE1267763). Only Bloors Place is predicted to have any visibility of the Site. This is a 16th century hall house built for Christopher Bloor, the rear wing was rebuilt in the late 17th century and it was partly destroyed by fire in the 18th century. It is listed for its unusual plan and as a rare example of a hall with an original rear chimney stack, it also has group value with the rear walled garden walls and cart lodge and outbuildings (which are Grade II listed in their own right as NHLE1267767 and 1267759).

The remaining 53 Listed Buildings are Grade II, these are mostly (a total of 35 buildings) within the built-up areas of Rainham and Gillingham with no predicted visibility of the Site, all but three of these 35 are over 1km from the Site. The 18 Grade II Listed Buildings within 1km of the Site with predicted visibility of a potential development within it are distributed between the Lower Rainham Conservation Area to the east (six buildings) and the Lower Twydall Conservation Area to the south of the Site (five buildings). The others, with the exception of Pump Farm located c.250m to the east, are situated along Lower Rainham Road to the north and northwest of the Site.

Conservation Areas

Of the Conservation Areas within 3km of the Site most are within the built-up areas of Gillingham and Rainham over 1km from the Site. Only Lower Rainham and Lower Twydall (both within 1km of the Site) are predicted to have any visibility of the Site.

There are no Conservation Area appraisals available for Lower Twydall or Lower Rainham Conservation Areas. However, the Pump Lane application documents (in particular the response from Kent CC's Senior Archaeological Officer) provide some commentary on the character of these two areas. The Lower Rainham Conservation Area is described as a loose

June 2020

Land South of Lower Rainham Road, Gillingham

cluster of buildings of varying dates along Lower Rainham Road, with ribbon development of more recent date east along this road towards East Rainham. This contrast in the date of development allows the conservation area to be appreciated as reflecting the historic core of the small rural settlement between Chapel House and Bloors Place. The surrounding agricultural land helps define this as a distinct settlement. The Lower Twydall Conservation Area is described as containing a range of buildings of different styles and dates but with an overall impression of a small settlement of agricultural origin. The agricultural nature of the settlement (all the listed buildings and several of the non-listed buildings are of agricultural origin or style) and the historic ties to the surrounding land makes an important contribution to the conservation area's special interest.

3.5.4. Non-designated heritage assets

Refer to Figure 9: Selected Non-Designated Heritage Assets in Proximity to the Site

The online Historic Environment Record (HER) data and the Desk-Based Assessment (DBA) for the Pump Lane application both identify that abundant Paleolithic finds were recovered from the foreshore near Sharps Green. These were in deposits used to create a causeway to a wharf on Horrid Hill but originated from “*terrace deposits at Twydall Chalk Pit*” (located within the Site).

The consultation responses to the Pump Lane application from both Kent County Council's Archaeological Advisor and from Historic England note that these Paleolithic finds are considered to be of importance and although they cannot be Scheduled the NPPF policies relating to designated assets will apply (in accordance with footnote 63 of the NPPF). Further artefacts may be expected to occur within the terrace deposits (and were recorded from a borehole north of the chalkpit in 1971 - BGS ID: 637893, NGR 580630,168010). The eastern half of the site is mapped (by the British Geological Survey³) as containing superficial deposits of clay, silt, sand and gravel overlying Seaford Chalk Formation. No superficial deposits are mapped for the west of the Site where the underlying bedrock is sand, silt and clay of the Thanet Formation.

Investigations within the Site to inform the ground solution risk zone plan noted that the west of the site contained Thanet Formation directly below the topsoil at a depth of c.0.3m to between 0.9 and 2.9m with Seaford Chalk below this. The eastern part of the site was noted as containing head deposits of varying thickness below the topsoil with Thanet Formation deposits becoming scarcer to the east of the chalk pit and the Seaford Chalk at depths of over 2.1m.

No other non-designated assets are recorded within the Site, although the HER does record additional historic buildings within Lower Twydall and at Sharps Green as well as a fish weir (TQ 86 NW 1038) and Roman finds (TQ 86 NW 2) near Sharps Green.

The consultation response from Kent County Council's Archaeological Advisor to the Pump Lane application highlighted the potential on that site for currently unrecorded post-Palaeolithic archaeological remains to be present and recommended that an archaeological evaluation be carried out, which has not yet been completed. Therefore there is limited information available regarding the archaeological potential of the Site, however it may be

³ <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>

June 2020

Land South of Lower Rainham Road, Gillingham

expected that there may be unrecorded remains within the Site. The presence/absence and importance of any such remains cannot be determined without further investigation.

3.6. Potential Effects and Recommendations

This section of the appraisal considers the potential effects on heritage assets arising from development of the type proposed. This includes potential effects arising from changes within the setting of heritage assets. The appraisal of potential effects addresses each of the themes presented in the heritage baseline presented in Section 3.5.

Measures to mitigate adverse effects are noted, along with other measures that could be deployed to deliver localised enhancement to heritage assets and how their significance can be understood and appreciated.

	Nature of Effects	Potential to Mitigate adverse effects and deliver localised enhancements
Historic Landscape Character	Change of use from agricultural land to mixed residential will alter the historic landscape character of this area. Historic “grain” of landscape formed by pattern of linear routes leading from Watling Street on the higher ground down towards the Medway with dispersed small settlements and later ribbon development.	Potential for public open space to incorporate community orchards, reflecting the historic landuse in this area. The grain of the landscape is retained in the alignment of principal routes. The concept plan is for two smaller, distinct neighbourhoods rather than a single large development, which will mitigate any “urbanising” effects.
Important Hedgerows	Loss of hedgerows within the Site would further erode the historic landscape character of this area	Consideration will be given to retaining hedgerows where possible as the concept plan evolves.
Hoo Fort Scheduled Monument Fort Darnet Scheduled Monument	Visual change to wider setting is not considered to result in harm to the significance of these assets.	N/A
Lower Twydall Conservation Area	Development within the setting of the conservation	Creation of an orchard buffer between the Conservation Area and the Site will help mitigate the

June 2020

Land South of Lower Rainham Road, Gillingham

	area has the potential to harm its character and appearance.	change in the setting of the Conservation Area, retaining its character and appearance as a small hamlet bounded by agricultural and horticultural land.
Lower Rainham Conservation Area	The immediate setting of Lower Rainham will remain as agricultural land (mainly orchards) and there will be no effects on the character and appearance of the conservation area are predicted.	N/A
Other Conservation Areas	No effects predicted	N/A
East Court Farmhouse (Grade II Listed Building)	The farmhouse will continue to be experienced within its farmstead with associated agricultural buildings, however development of the Site has the potential to erode the contribution that the surrounding agricultural land use makes to the significance of this building.	Creation of open space to the east and west of the farm will help mitigate the effect of the development by creating a buffer between the farm and the development.
Bay Tree Villa (Grade II Listed Building)	This early 19 th century villa house will continue to be experienced within an area of ribbon development along Lower Rainham Road, no harm to its significance is predicted as the agricultural use of the land within the Site does not contribute to its significance.	N/A
The Black House (Grade II Listed Building)	Development of the Site will alter the historic landuse of the fields to the south of this former agricultural workers cottage, eroding the contribution that this landuse	The concept plan shows development set back from the northern edge of the Site which will further minimize visibility of

June 2020

Land South of Lower Rainham Road, Gillingham

	makes to the significance of the building (although the Site is screened by the existing hedgerow boundary).	the development from the listed building.
Pump Farm (Grade II Listed Building)	The immediate surroundings of the farmhouse will remain as orchards and no harm to the significance of this building is predicted	N/A
Little London Farmhouse (Grade II Listed Building in Lower Twydall)	Development of the Site has the potential to erode further the remaining agricultural setting of this building (modern development to the south has already reduced this)	Creation of public open space in the field to the north of the farmhouse will mitigate the effect of the development – there is potential for part of this area to be reinstated as orchard, enhancing the setting of the listed building by restoring the historic landuse of its immediate setting.
Manor Barn and attached north and west walls (Grade II Listed Building in Lower Twydall)	These buildings will continue to be experienced as a group of associated historic buildings within the hamlet of Lower Twydall.	Creation of public open space in the fields to the north, east and west of this group of buildings will mitigate the effect of the development by retaining separation between the northern edge of Lower Twydall and the new development – there is potential for parts of these areas to be reinstated as orchard, enhancing the setting of the listed buildings by restoring the historic landuse of their immediate setting.
Manor House and attached garden wall (Grade II Listed Building in Lower Twydall)	Development of the Site has the potential to erode the agricultural setting of these buildings which makes a positive contribution to their significance (although Twydall Barn and Manor Barn have been converted to residential use)	
Twydall Barn and attached wall (Grade II Listed Building in Lower Twydall)		
York Farmhouse (Grade II Listed Building in Lower Twydall)	The farm will continue to be experienced at the southern end of Lower Twydall with an associated range of outbuildings and orchards to the east. No harm is predicted	N/A

June 2020

Land South of Lower Rainham Road, Gillingham

Bloors Place (Grade II* Listed Building in Lower Rainham)	This large house will continue to be experienced within its large gardens with associated listed buildings between the historic core of Lower Rainham and more recent development to the east. No harm is predicted	N/A
Garden walls to south and east of Bloors Place (Grade II Listed Building in Lower Rainham)	The positive contribution made by setting to these buildings through their associated and intervisibility with Bloors Place will not be altered and no harm is predicted.	N/A
Range of outbuildings including cart lodge and granary west of Bloors Place (Grade II Listed Building in Lower Rainham)		
Chapel House (Grade II Listed Building in Lower Rainham)	Chapel House will remain the westernmost building within Lower Rainham, separated from the Site by two fields. The positive contribution that this village edge setting makes to the significance of the building will not be altered.	N/A
497, 499 and 501 Lower Rainham Road (Grade II Listed Building in Lower Rainham)	These buildings will continue to be experienced within the Lower Rainham Conservation Area and no change to their setting is predicted.	N/A
The Old House (Grade II Listed Building in Lower Rainham)		

June 2020

Land South of Lower Rainham Road, Gillingham

Other Listed Buildings	No visibility of the Site predicted, and no change within their setting	N/A
Potential Palaeolithic remains (non-designated heritage assets of equivalent importance to Scheduled Monuments)	Ground works for development (topsoil stripping, foundations, services, landscaping) may disturb areas containing further Palaeolithic artefacts.	The concept plan shows an indicative layout allowing flexibility in the design of any scheme to avoid impacts where necessary following further archaeological investigation. Interpretation will be provided, potentially within the former chalk pit or as part of any new community facility, providing details of any important Palaeolithic remains.
Potential post-Palaeolithic remains (non-designated heritage assets of lesser importance)	Ground works for development (topsoil stripping, foundations, services, landscaping) may disturb currently unknown archaeological remains post-dating the Palaeolithic.	

June 2020

Land South of Lower Rainham Road, Gillingham

4.0 Summary of Proposed Mitigation Measures

- Appropriate scale of development retaining the majority of the locally designated landscape fringing Gillingham to the west and Rainham to the east.
- Development form and layout that follows the south-west to north-east orientation of lanes and fields.
- Development configuration across two neighbourhoods, including farmstead style residential development adjacent to Lower Twydall Lane, reflecting the character of the local village vernacular, rather than adjacent urban areas.
- Potential to reference local materials, building forms and sizes in the design of new residential properties and other buildings.
- Retention and enhancement of boundary vegetation and appropriate development offsets from adjacent roads to retain landscape structure; integrate the development into the landscape; and reduce likelihood of harmful visual impacts.
- New planting within the proposed development to create an attractive setting and further help integrate new buildings in to the landscape.
- Landscape buffer containing productive orchards and public open space to limit adverse effects on the setting of the Lower Twydall Conservation Area and other adjacent residential areas.
- An extensive, well connected and multi-functional network of public open spaces and areas for wildlife, including the former chalk pit.
- Network of new publicly accessible pedestrian and cycle routes running through the development and proposed open space including connections to the Riverside Country Park.
- Areas of public open space and routes to include appropriate signage, including interpretation of any important landscape and heritage features.
- Sustainable drainage features integrated with landscape proposals offering opportunities for amenity and enhanced wildlife value.
- Long-term management and maintenance of public open spaces and landscape features such as hedgerows and community orchards to maintain amenity and biodiversity interest.

June 2020

Land South of Lower Rainham Road, Gillingham

5.0 Conclusion

The Landscape, Visual and Heritage Appraisal demonstrates that the Site is capable of accommodating new development of the type and configuration proposed.

Whilst new development would inevitably result in the loss of agricultural land and other landscape elements and features, there is the potential to mitigate adverse effects and deliver localised environmental enhancements through a comprehensive landscape strategy, including the provision of new productive and accessible landscapes for play, amenity the production of locally grown food and access to nature. New routes would also improve connectivity to the Riverside Country Park.

The Site is located within an area designated as an Area of Local Landscape Importance, and whilst some harm would arise, adverse effects would be localised and the purposes of the designation as a green buffer separating the built-up areas of Twydall and Rainham from the Medway Estuary would be retained. It is unlikely any significant effects on the role of the area as a green backdrop in views from the Medway would arise.

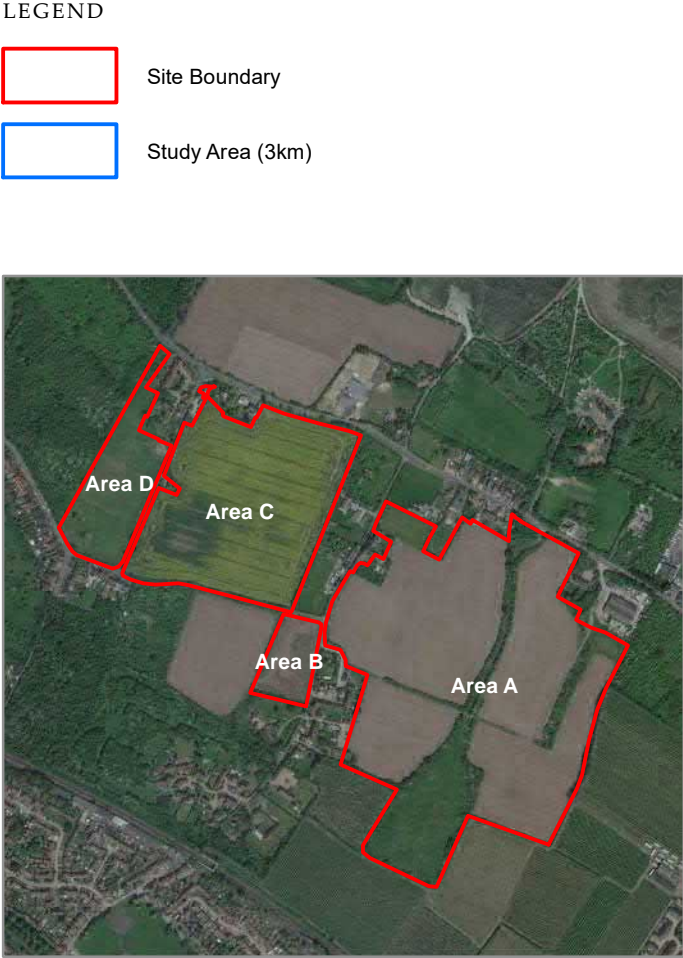
Grange Road is designated as a Rural Lane. The route would not be severed by development and its rural qualities would be retained where possible by offsetting the edge of the adjacent built development and enhancing the adjacent hedgerow. There is also potential to enhance the rural qualities, amenity and biodiversity value of a stretch of Grange Road adjacent to the Site by diverting vehicular traffic into the development.

The Site is located adjacent to the Lower Twydall Conservation Area, which contains several Grade II Listed Buildings that reflect the rural character and qualities of the settlement. New built development is offset and areas of public open space and community orchards are proposed for the area within the offset.

Two listed buildings along Lower Rainham Road to the north of the Site (East Court Farmhouse and The Black House) similarly have a rural character. New built development will be offset and areas of public open space, including orchards are proposed for the areas within the offset.

The historic grain of the local landscape, connecting higher ground to the south of the Site to the River Medway is retained in the alignment of principal routes and built development.

There is potential to enhance the understanding of the area's heritage through the provision of interpretation within areas of public open space and/or within the community building, highlighting in particular the important Palaeolithic artefacts found locally and incorporating any results from investigations in advance of development.



Inset map to illustrate Parcels referenced in report

L D A DESIGN

PROJECT TITLE
LAND SOUTH OF LOWER RAINHAM ROAD,
GILLINGHAM

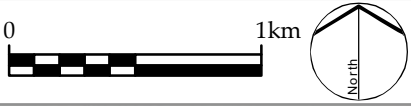
DRAWING TITLE
Figure 1: Site location and Study Area

ISSUED BY	Oxford	T: 01865 887050
DATE	June 2020	DRAWN SG
SCALE @A3	1:30,000	CHECKED IH
STATUS	Final	APPROVED PL

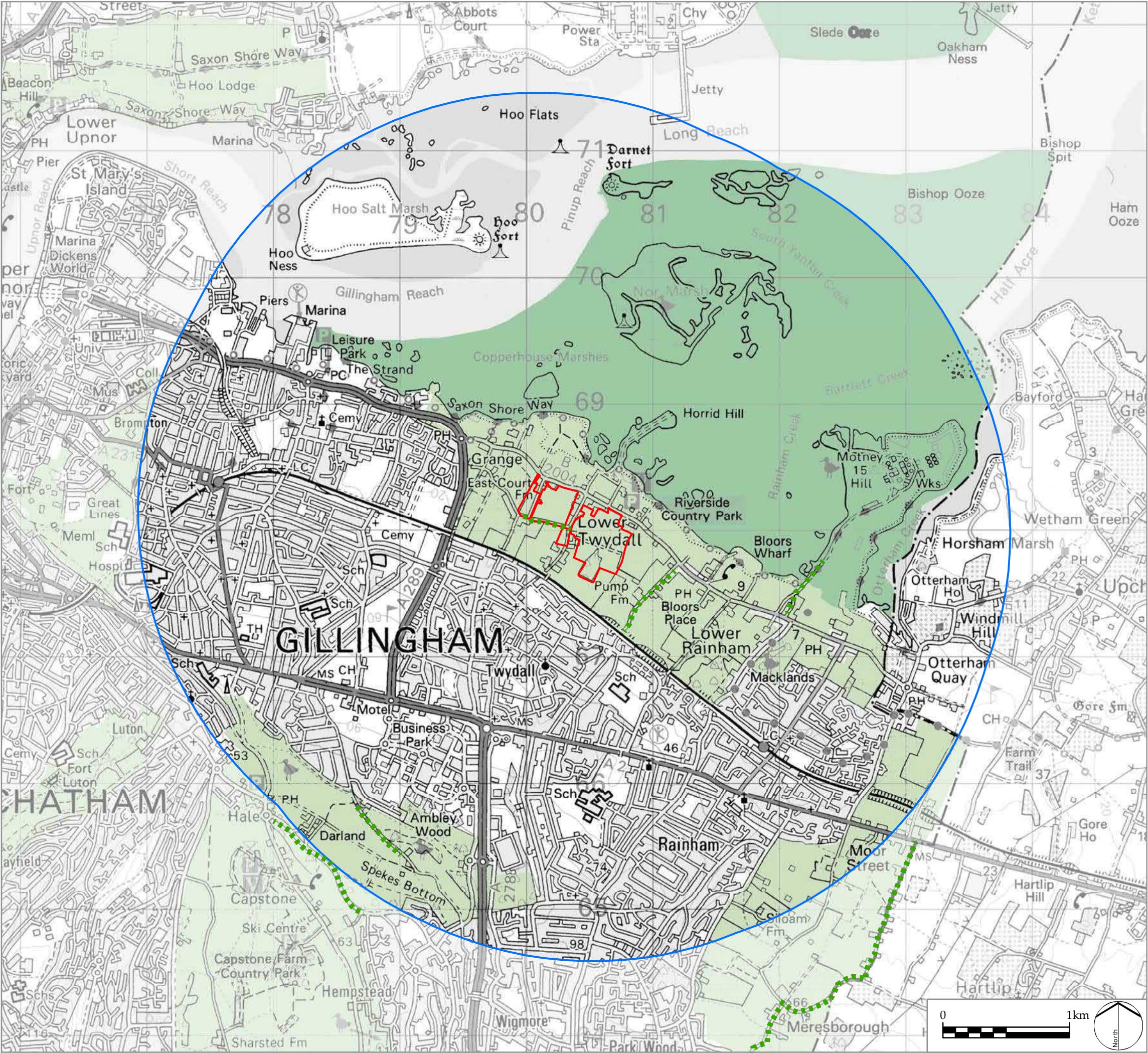
DWG. NO. 7092_001

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

© LDA Design Consulting Ltd. Quality Assured to BS EN ISO 9001 : 2008



Z:\7092_RAINHAM ROAD, GILLINGHAM\GIS\PROJECTS\7092_002_LANDSCAPE.MXD



LEGEND

- Site boundary
- Study Area (3km)
- North Kent Marshes Special Landscape Areas BNE33¹
- Areas of Local Landscape Importance BNE34¹
- Rural Lanes BNE47¹

¹Digitised by LDA Design from Medway Local Plan Proposals Map Adopted May 2003

LDA DESIGN

PROJECT TITLE
LAND SOUTH OF LOWER RAINHAM ROAD,
GILLINGHAM

DRAWING TITLE
Figure 2: Landscape Designations

ISSUED BY	Oxford	T: 01865 887050
DATE	June 2020	DRAWN SG
SCALE @A3	1:30,000	CHECKED IH
STATUS	Final	APPROVED PL

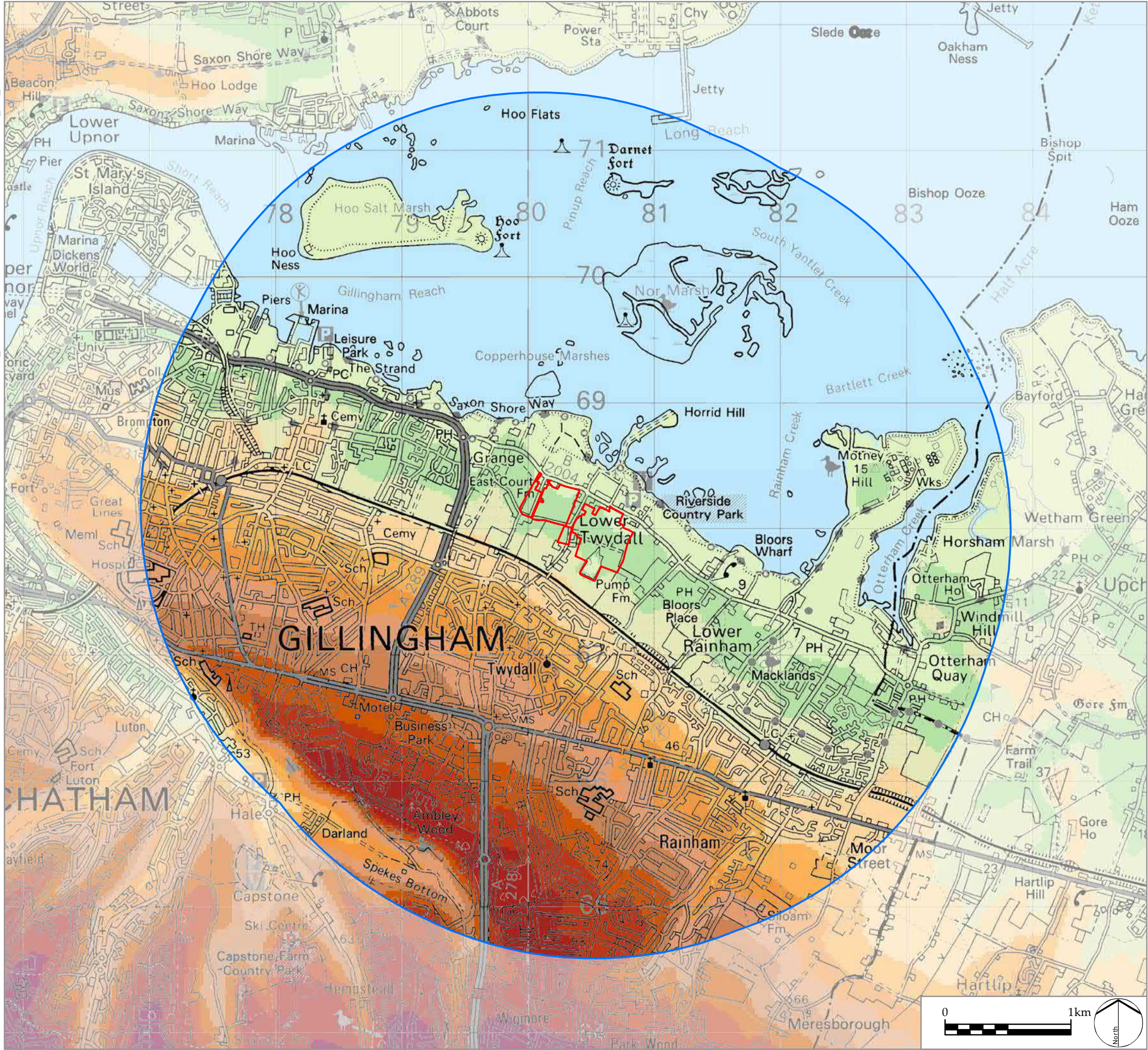
DWG. NO. 7092_002

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

© LDA Design Consulting Ltd. Quality Assured to BS EN ISO 9001 : 2008

Sources: Ordnance Survey, Natural England, DCLG, Medway Council

Z:\7092_RAINHAM ROAD, GILLINGHAM\GIS\PROJECTS\7092_003_TOPOGRAPHY.MXD



LEGEND

Site boundary

Study Area (3km)

Elevation (mAOD)

<div></div> < 0	<div></div> 60 - 70
<div></div> 0 - 10	<div></div> 70 - 80
<div></div> 10 - 20	<div></div> 80 - 90
<div></div> 20 - 30	<div></div> 90 - 100
<div></div> 30 - 40	<div></div> 100 - 110
<div></div> 40 - 50	<div></div> 110 - 120
<div></div> 50 - 60	<div></div> > 120

LD&A DESIGN

PROJECT TITLE

LAND SOUTH OF LOWER RAINHAM ROAD,
GILLINGHAM

DRAWING TITLE

Figure 3: Topography

ISSUED BY

Oxford

DATE

June 2020

SCALE @A3

1:30,000

STATUS

Final

T: 01865 887050

DRAWN

SG

CHECKED

IH

APPROVED

PL

DWG. NO.

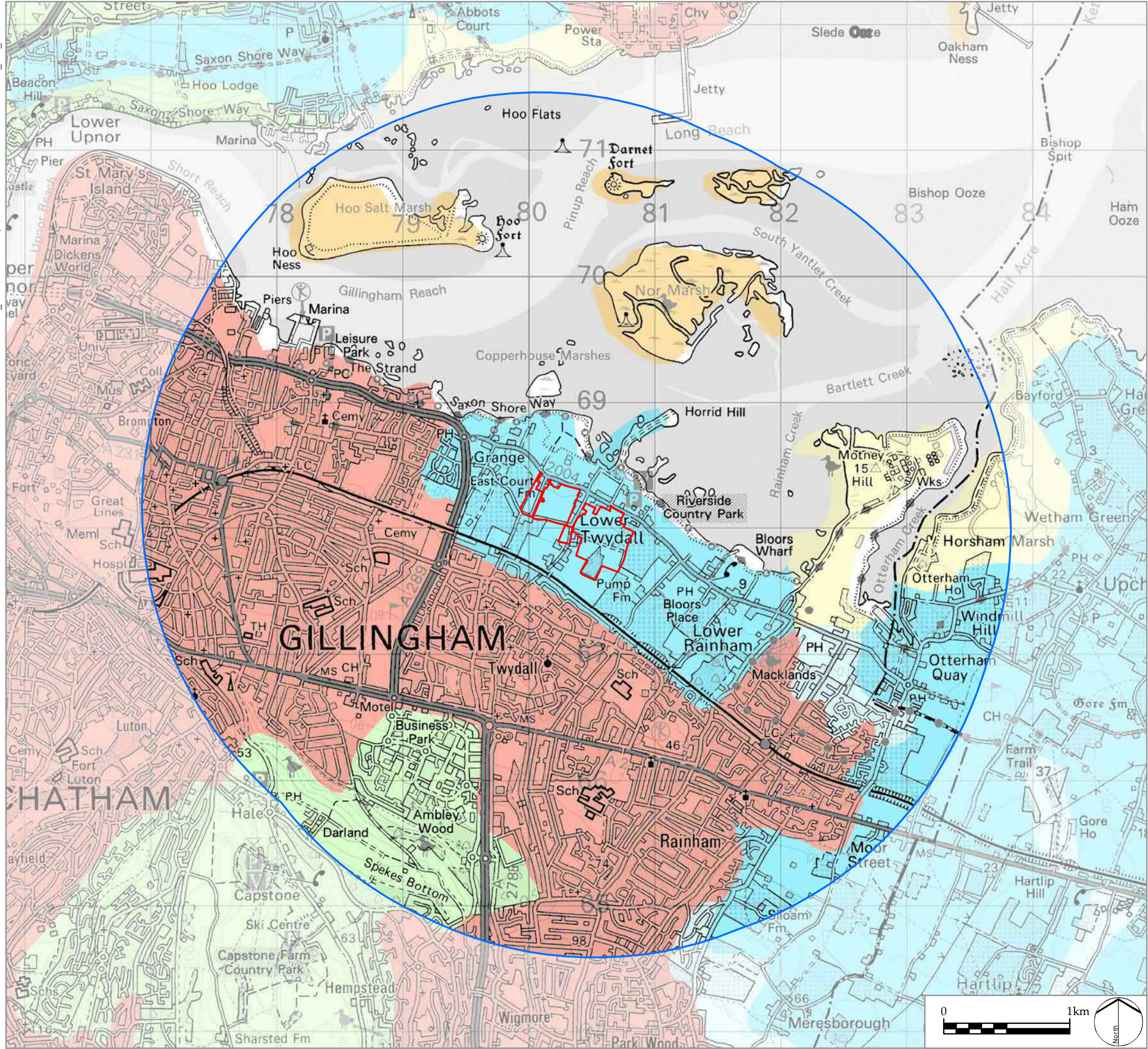
7092_003

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

© LDA Design Consulting Ltd. Quality Assured to BS EN ISO 9001 : 2008

Sources: Ordnance Survey, NextMap25

Z:\7092_RAINHAM ROAD, GILLINGHAM\GIS\PROJECTS\7092_004_ALC.MXD



LEGEND

- Site boundary
- Study Area (3km)
- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Non Agricultural
- Urban

LD̂DESIGN

PROJECT TITLE
LAND SOUTH OF LOWER RAINHAM ROAD,
GILLINGHAM

DRAWING TITLE
Figure 4: Provisional Agricultural Land Classification

ISSUED BY	Oxford	T: 01865 887050
DATE	June 2020	DRAWN SG
SCALE @A3	1:30,000	CHECKED IH
STATUS	Final	APPROVED PL

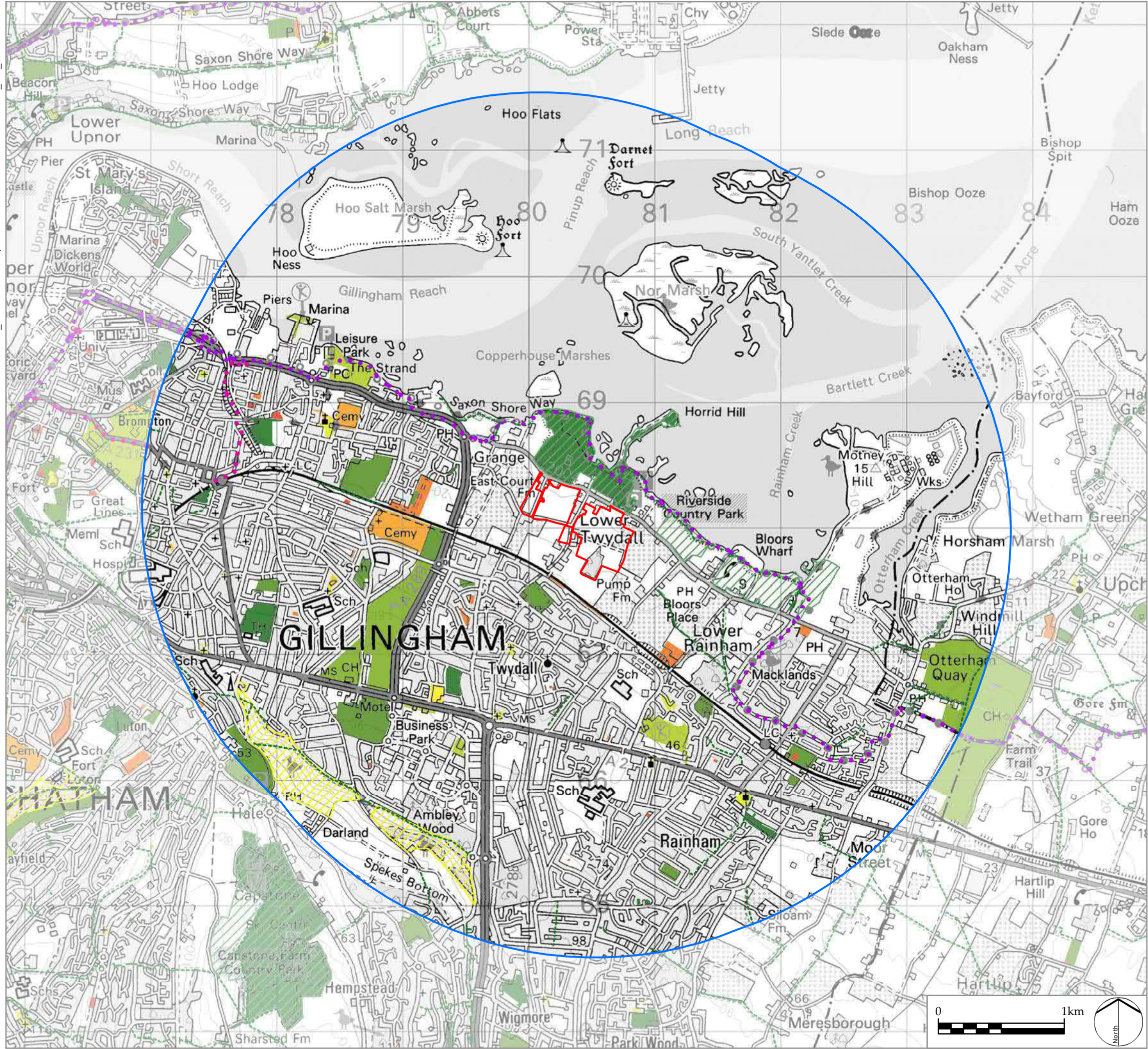
DWG. NO. 7092_004

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

© LDA Design Consulting Ltd. Quality Assured to BS EN ISO 9001 : 2008

Sources: Ordnance Survey, ADAS, Defra

Z:\7092_RAINHAM ROAD, GILLINGHAM\GIS\PROJECTS\7092_005_ACCESS.MXD



LEGEND

Site boundary

Study Area (3km)

Public Rights of Way

Greenspace

LD A DESIGN

PROJECT TITLE
LAND SOUTH OF LOWER RAINHAM ROAD,
GILLINGHAM

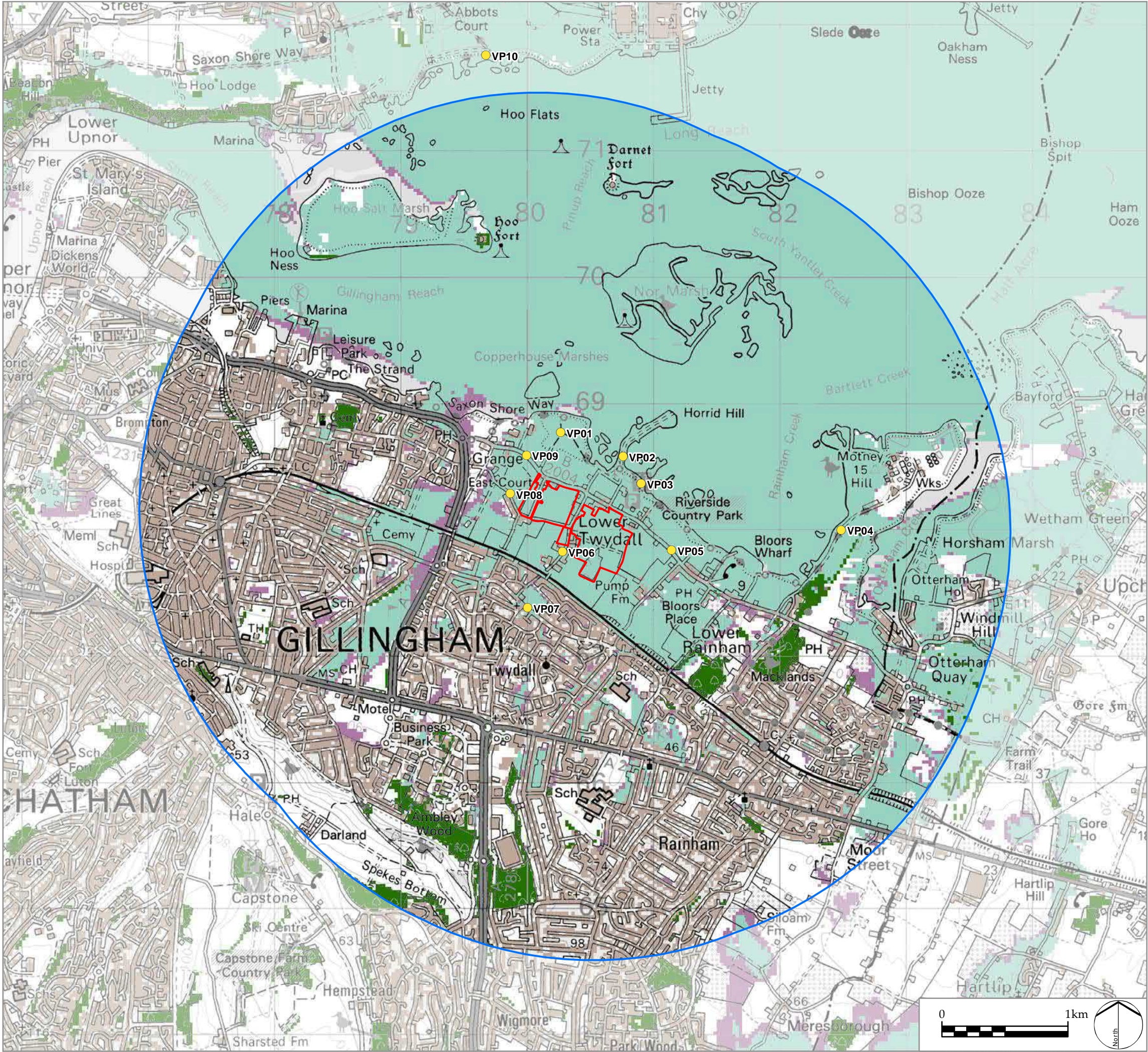
DRAWING TITLE
Figure 5: Access and Recreation

ISSUED BY	Oxford	T: 01865 887050
DATE	June 2020	DRAWN SG
SCALE @A3	1:30,000	CHECKED IH
STATUS	Final	APPROVED PL

DWG. NO. 7092_005

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.
© LDA Design Consulting Ltd. Quality Assured to BS EN ISO 9001 : 2008
Sources: Ordnance Survey, Natural England, Sustrans

Z:\7092_RAINHAM ROAD, GILLINGHAM\GIS\PROJECTS\7092_006_ZTV_VPS.MXD



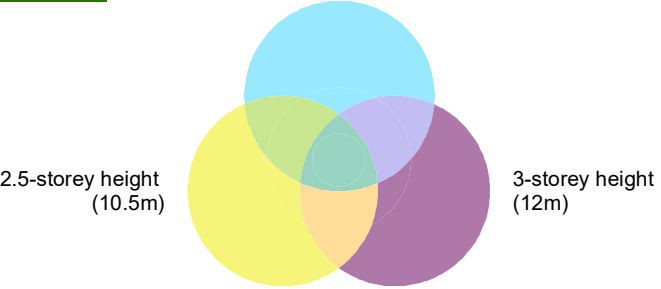
LEGEND

- Site boundary
- Study Area (3km)
- Viewpoint Locations

Preliminary ZTV study

Obstructions

- Urban Area
- Woodland 2-storey height (8.5m)



This drawing is based upon computer generated Zone of Theoretical Visibility (ZTV) studies produced using the viewshed routine in the ESRI ArcGIS Suite. The areas shown are the maximum theoretical visibility, taking into account topography, principal woodlands and settlements, which have been included in the model with the heights obtained from Nextmap 25. It should be noted that in some areas woodlands included within the ZTV may comprise active forestry, resulting in the felling and replanting of some areas modelled in the ZTV study. The ZTV study reflects this pattern at a specific point in time, as it is based on real height information. Whilst the felling cycle will alter the heights of different areas of forestry over time, altering localised visual effects, the wider pattern will remain relatively constant.

The model does not take into account any localised features such as small copses, hedgerows or individual trees and therefore still gives an exaggerated impression of the extent of visibility. The actual extent of visibility on the ground will be less than that suggested by this plan.

The ZTV includes an adjustment that allows for Earth's curvature and light refraction. It is based on Nextmap 25 terrain data and has a 25m² resolution.

LDA DESIGN

PROJECT TITLE
LAND SOUTH OF LOWER RAINHAM ROAD,
GILLINGHAM

DRAWING TITLE
Figure 6: Zone of Theoretical Visibility Study (ZTV)
Proposed Building Heights 8.5 - 12m

ISSUED BY	Oxford	T: 01865 887 050
DATE	June 2020	DRAWN NA/SGi
SCALE @A3	1:30,000	CHECKED PL
STATUS	Final	APPROVED PL

DWG. NO. 7092_006

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

© LDA Design Consulting Ltd. Quality Assured to BS EN ISO 9001 : 2008

Sources: Ordnance Survey

Z:\7092_Rainham Road, Gillingham\6docs\7092_007_Phograph_Panels.indd



Viewpoint 1: Views south from Riverside Country Park (publicly accessible woodland close to Walnut Tree Farm)

v2018.0



Viewpoint 2: View south from Riverside County Park (causeway out to Horrid Hill)

Z:\7092_Rainham Road, Gillingham\6docs\7092_007_Phograph_Panels.indd



Viewpoint 3:View south-west from the Saxon Way (Riverside Country Park)

v2018.0



Viewpoint 4: View west from the Saxon Way (Motney Hill)

ISSUED BY		Oxford	t: 01865 887050		PROJECT TITLE	
DATE		June 2020	DRAWN		SG	LAND SOUTH OF LOWER RAINHAM ROAD, GILLINGHAM
PAGE SIZE		420mm x 297mm	CHECKED		IH	
STATUS		Final	APPROVED		PL	
DWG. NO. 7092_007						DRAWING TITLE
						Figure 7: Photograph Panels

Z:\7092_Rainham Road, Gillingham\6docs\7092_007_Phograph_Panels.indd



Viewpoint 5: View west from Lower Rainham Road (near Pump Lane junction)

v2018.0



Viewpoint 6: View south from Lower Twydall Lane (near Manor House)

Z:\7092_Rainham Road, Gillingham\6docs\7092_007_Phograph_Panels.indd



Viewpoint 7: View south from Beechings Way (Beechings Playing Fields)

v2018.0



Viewpoint 8: View east from Grange Road

ISSUED BY	Oxford	t: 01865 887050	
DATE	June 2020	DRAWN	SG
PAGE SIZE	420mm x 297mm	CHECKED	IH
STATUS	Final	APPROVED	PL

DWG. NO. 7092_007

PROJECT TITLE
LAND SOUTH OF LOWER RAINHAM ROAD, GILLINGHAM

DRAWING TITLE
Figure 7: Photograph Panels








Z:\7092_Rainham Road, Gillingham\6docs\7092_007_Phograph_Panels.indd



Viewpoint 9: View south-east from Lower Rainham Road (near Eastcourt Lane junction)



Viewpoint 10: View south from Saxon Shore Way (Hoo)

	Site boundary
	Study Area (3km)
Listed Buildings	
	Grade I
	Grade II
	Grade II*
	Scheduled Monument
	Conservation

LDÄ DESIGN

PROJECT TITLE

RAINHAM ROAD, GILLINGHAM

DRAWING TITLE

Figure 8: Heritage Designations

ISSUED BY	Oxford	T: 01865 887050	
DATE	June 2020	DRAWN	SG
SCALE @A3	1:30,000	CHECKED	IH
STATUS	Final	APPROVED	PL

DWG. NO. 7092_008

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.
© LDA Design Consulting Ltd. Quality Assured to BS EN ISO 9001 : 2008
Sources: Ordnance Survey, Historic England



LEGEND

Site boundary

Study Area (3km)

LDĀDESIGN

PROJECT TITLE
RAINHAM ROAD, GILLINGHAM

DRAWING TITLE
Figure 9: Selected Non-Designated Heritage Assets in Proximity to the Site

ISSUED BY	Oxford	T: 01865 887050
DATE	June 2020	DRAWN SG
SCALE @A3	1:5,000	CHECKED IH
STATUS	Final	APPROVED PL

DWG. NO. 7092_009

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

© LDA Design Consulting Ltd. Quality Assured to BS EN ISO 9001 : 2008

Sources: Ordnance Survey, Headland Archaeology

Appendix 1: National Planning Policy

The National Planning Policy Framework (NPPF, February 2019) makes clear that the purpose of planning is to help achieve sustainable development (Section 2), and that design (Section 12), and effects on the natural environment (Section 15) are important components of this.

Paragraph 11 sets out that in determining applications for development this means that developments which accord with an up-to-date development plan should be approved. Where the development plan is not fit for the purpose of determining the application, paragraph 11 directs that the permission should be granted unless *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”* or *“the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed”*. The areas or assets of particular importance in respect of landscape and visual matters referred to within the relevant footnote 6 are:

- Area of Outstanding Natural Beauty (AONB);
- National Parks including the Norfolk Broads;
- Heritage Coast.

The list also includes important and/or irreplaceable habitats, designated heritage assets, areas at risk of flooding or coastal change, and land-use designations (Green Belt, Local Green Space).

Section 11 sets out considerations in ‘Making Effective Use of Land’ and notes in paragraph 122 that in respect of development density the considerations should include whether a place is well-designed and *“the desirability of maintaining an area’s prevailing character and setting ... or of promoting regeneration and change”*.

Paragraph 127 of the NPPF indicates that decisions should ensure that developments:

“a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space)...”

Section 15 of the NPPF covers both ecological and landscape matters. Paragraph 170 requires that decisions should contribute by:

“a) protecting and enhancing valued landscapes, ... (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate; ...”

In respect of valued landscapes, paragraph 171 notes that planning policy should *“distinguish between the hierarchy of international, national and locally designated sites”*.

Paragraph 180 requires decisions to ensure that *“new development is appropriate for its location”* including by limiting the impact of light pollution on local amenity and *“intrinsically dark landscapes”*.

Planning Practice Guidance for Natural Environment, July 2019

This document is intended to explain the key issues in implementing policy to protect biodiversity, but also contains a section on landscape. This section reiterates policy within the NPPF stating *“plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes.”*

The guidance highlights the importance of identifying the special characteristics of locally valued landscaped within policy and the option for plans to *“include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary.”* The same paragraph also states that *“cumulative impacts of development on the landscape need to be considered carefully”* (para 036).

This document also provides guidance on green infrastructure, highlighting types of green infrastructure (para 004) and the benefits which they provide (005), including achieving well-designed places as *“green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place and natural beauty”* (para 006).

Planning Practice Guidance for Design, March 2014

The guidance sets out principles in respect of the design of a development, noting that:

“Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations.

Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.”

In respect of the determining applications and the relationship between a proposal and the surrounding townscape, the guidance notes that:

“Local planning authorities are required to take design into consideration and should refuse permission for development of poor design. Local planning authorities should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area. This could include the use of innovative construction materials and techniques. Planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design...”

In respect of local character, the guidance further notes that:

“Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation.

The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre.

When thinking about new development the site’s land form should be taken into account. Natural features and local heritage resources can help give shape to a development and integrate it into the wider area, reinforce and sustain local distinctiveness, reduce its impact on nature and contribute to a sense of place. Views into and out of larger sites should also be carefully considered from the start of the design process.

Local building forms and details contribute to the distinctive qualities of a place. These can be successfully interpreted in new development without necessarily restricting the scope of the designer. Standard solutions rarely create a distinctive identity or make best use of a particular site. The use of local materials, building methods and details can be an important factor in enhancing local distinctiveness when used in evolutionary local design, and can also be used in more contemporary design. However, innovative design should not be discouraged.

The opportunity for high quality hard and soft landscape design that helps to successfully integrate development into the wider environment should be carefully considered from the outset, to ensure it complements the architecture of the proposals and improves the overall quality of townscape or landscape. Good landscape design can help the natural surveillance of an area, creatively help differentiate public and private space and, where appropriate, enhance security.”

Appendix 2: Landscape Character Assessment Extracts

5 Riverside Marshes

Landscape type: Urban Fringe (T2)
 Sub-types: Urban fringe with urban/industrial influences (T1c); Saltmarsh (R4a)
 Forms part of Medway Marshes Character area (KCA 2004)

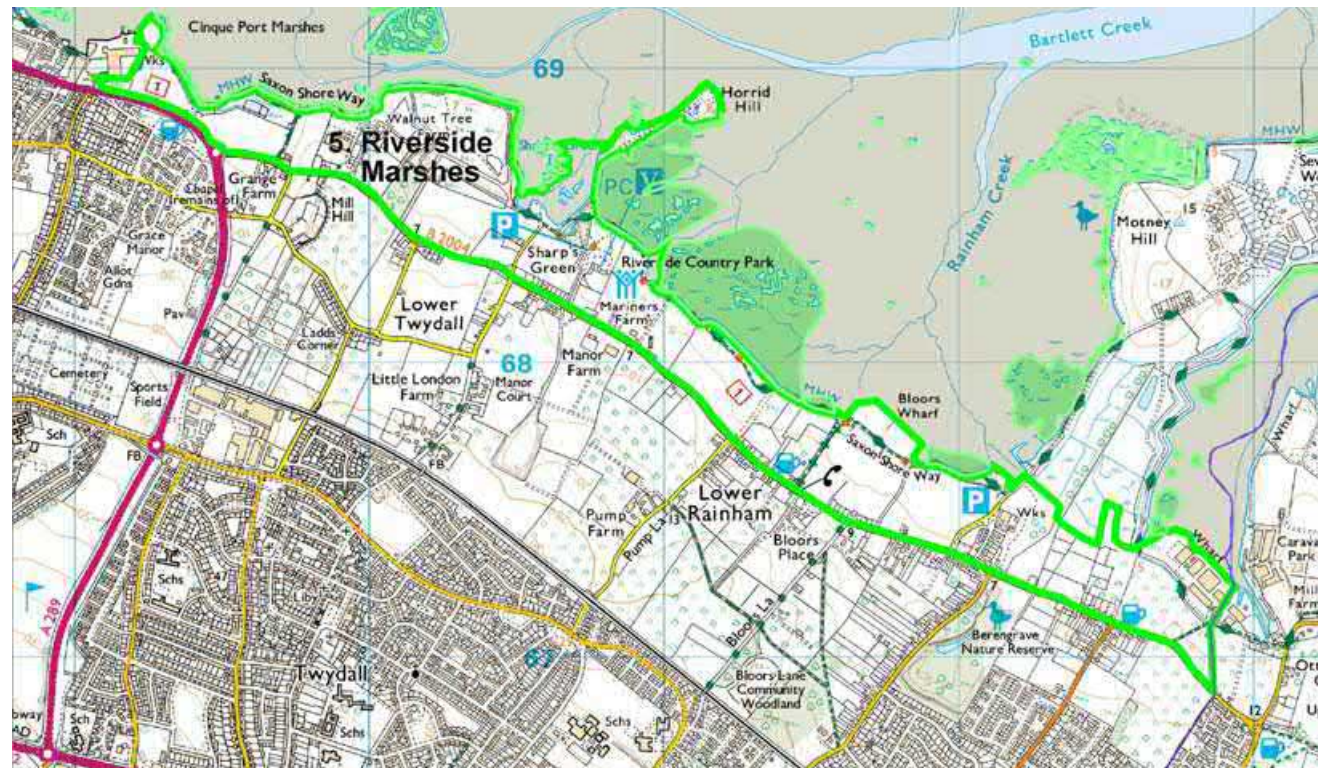
Description

- Location – Lower Rainham Road (B2004) to south, Medway estuary to north, Gillingham to west and Rainham to south
- Geology – Upper Chalk and Thanet Beds with alluvium and head deposits
- Soils – Grade I with undefined areas
- Accessibility – Good PROW network – Saxon Shore Way follows northern fringe; good access within country park; links to south but overall poor connections to main areas of population at Twydall and Rainham
- Designations – adjacent to Natura 2000/Ramsar sites; Designated Country Park; undeveloped coast
- Flood – most of area at risk from tidal flooding (2003)



Characteristics

- Strip of marshland rising gently to farmland and stretching from southern coastal edge of Medway estuary to Lower Rainham Road
- Strong industrial influences at Kingsnorth and Motney Hill; B2004 introduces urban influence
- Diverse land uses – scrub, orchards, small fields, equine related; area fragmented and lacks overall sense of coherence; land in poor condition around former equestrian centre at western end
- Saxon Shore way forms strong east/west link along sea wall; weaker north south links
- Several salt marsh areas add to distinctive character along estuary
- Much of area owned by Medway Council and managed as country park with Visitor Centre and Car Park – introduces amenity element rather than distinctly rural character
- Country Park designation (2003) extends to most of this character area



- Forms important buffer to urban edge of Gillingham, protects Natura 2000/Ramsar sites, valuable recreational and biodiversity resource, green corridor from countryside into urban area; integrally linked with Lower Rainham Farmland character area
- Historic features – includes Black House – small medieval grade 2 listed building to south of Visitor Centre in poor state of repair; strong industrial character remains from former uses – quays, cement works etc; includes several evocative hulks and other remains on the intertidal flats
- Long views and open character in views out to estuary from sea wall; stronger sense of enclosure to interior; provides good vantage point to view wider estuary including late 19th century artillery forts (Hoo and Darnet – scheduled monuments). Also views of industrial, energy and port infrastructure

Analysis

Condition *Moderate*

Pattern of elements – Variable

Detracting features – Some

Visual Unity – Interrupted

Ecological integrity – High

Cultural integrity – Variable/Poor

Functional integrity – Moderate

Sensitivity *Moderate*

Distinctiveness – Distinct

Continuity – Historic

Sense of place – Moderate

Landform – Apparent

Tree cover – Intermittent

Visibility – Moderate

Actions *Conserve and Create*

Issues

- Urban fringe degradation and threats to loss of distinctive character
- Sensitivity of marshes as covered by Natura 2000/Ramsar designation
- Role as buffer to marshland wildlife habitats; introduction of new natural features
- Green corridor, footpath and National Cycle route linking community in urban areas to countryside; weaker north south links
- Strong connections with Lower Rainham Farmland character area to south and overall role of two character areas as generous buffer and corridor separating urban areas from natural spaces of estuary
- Condition of farmland areas; land use proposals – e.g. re-introduction of orchards, new pond areas, improved visitor facilities
- Future plans for Riverside Country Park as recreational, educational and wildlife resource
- Historic character of the marshes and waterfront
- Protection and enhancement of salt marsh areas
- Creeping urbanisation in signage (especially EA signs) and other features



Guidelines

- Introduce positive land management that addresses future plans for country park
- Reflect historic character of the marshes within interpretation of the country park
- Balance potential conflicts between educational, recreational and wildlife interests
- Ensure new development proposals protect area from adverse visual and landscape character impacts
- Introduce more active management of farmland, including reintroduction of orchards, to reinforce sense of working landscape; improve roadside verges and grassland areas with native species planting (hedge-rows and native wildflower mixes)
- Seek to manage signage and other features to strengthen and reinforce rural character
- Improve habitat, access, recreation opportunities; improve access for urban communities to estuary – strengthen north-south footpath links towards urban areas at Twydall and Rainham
- Area has key role as gateway into Medway; linking urban areas and countryside and as interface between estuary and orchards of North Kent Fruit Belt
- Include preservation and interpretation of Black House alongside other development plans for Country Park

21 Lower Rainham Farmland

Landscape type: Urban Fringe (T2)

Sub-types: Urban fringe with urban/industrial influences (T2b)

Forms part of North Kent Fruit Belt Character area (KCA 2004)

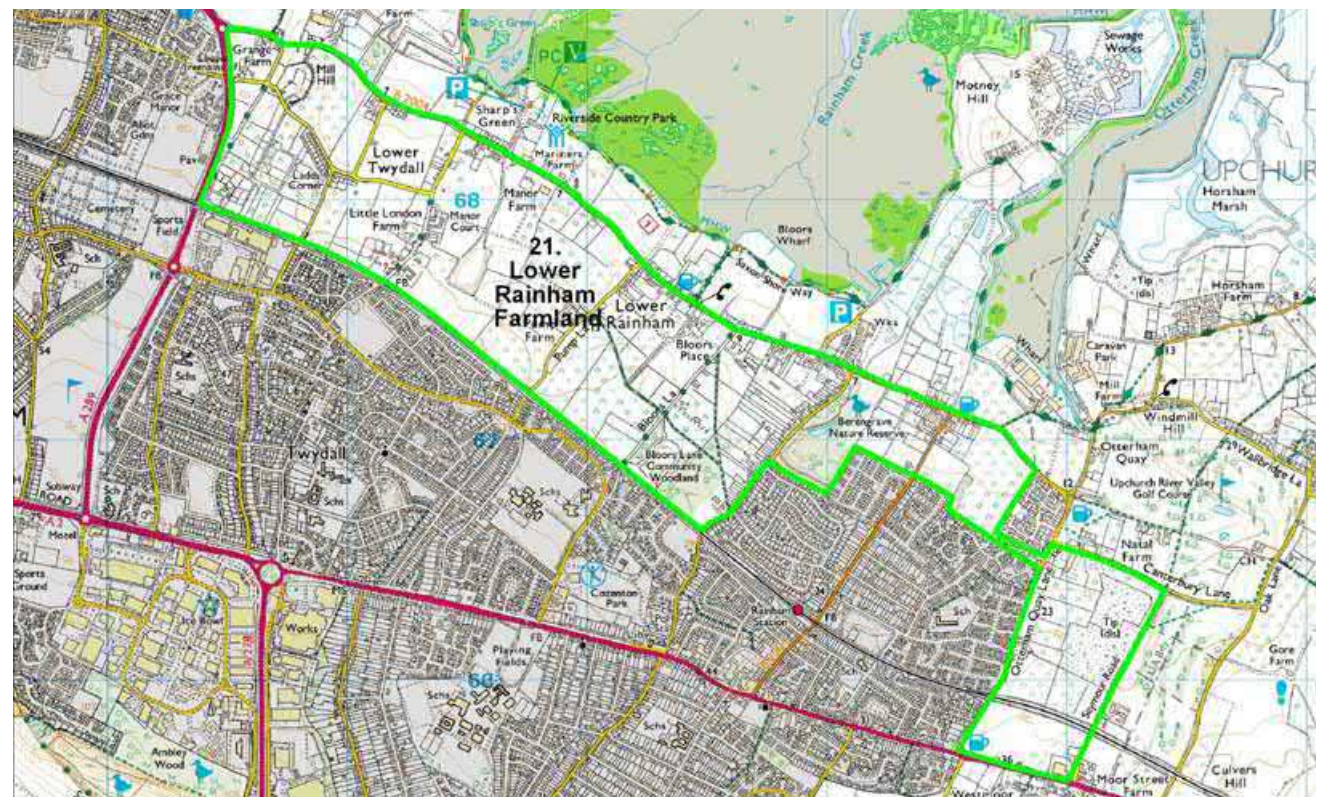
Description

- Location – Lower Rainham Road (B2004) and Riverside Marshes/Country Park to north; railway line and Twydall to south; Gillingham to west; Lower Rainham and countryside to east
- Geology – Upper Chalk and Thanet Beds (solid) with head deposits
- Soils – Predominantly Grade I
- Accessibility – footpath network fragmented; no continuous, direct link between Grange Farm and Berengrave Nature Reserve; rail line causes severance and weakens links into urban areas to south
- Designations – ALLI; 2 no. Conservation areas; 2 no. Rural lanes; 1 no. community woodland; Local Nature reserve
- Flood – Berengrave area at risk from tidal flooding (2003)

Characteristics

- Flat, small to medium scale mixed farmland – orchards, arable, rough grazing
- Neglected pockets of land and busy road gives transitional urban fringe character to area; gradual trend towards suburbanisation (e.g. boundary features) in some localised areas
- Some well managed areas of orchard, shelterbelt, farm buildings, cottages and distinctive rural hedgebanks
- Tranquil in many parts despite enclosure by road to north and rail to south

- Poor accessibility – east/west and north/south links to urban areas
- Recent urban extension to north west of Otterham Quay Lane now divides this character area and diminishes coherence; area to east beyond Rainham has particularly detracting urban and industrial features – including industrial estate, tip with vents and railway line; golf course to north along Swale boundary
- Includes small conservation areas/hamlets at Lower Rainham and Lower Twydall



Analysis

Condition *Moderate*

Pattern of elements – Variable
 Detracting features – Some
 Visual Unity – Interrupted
 Ecological integrity – Moderate
 Cultural integrity – Variable
 Functional integrity – Moderate

Sensitivity *Moderate*

Distinctiveness – Distinct
 Continuity – Historic
 Sense of place – Moderate
 Landform – Apparent
 Tree cover – Intermittent
 Visibility – Moderate

Actions *Conserve and Create*

Issues

- Value of area as green corridor linking community in urban areas to countryside and role as extended buffer to Country Park and Natura 2000/Ramsar protected coastline
- Consideration of the integral links between this character area and the Riverside Marshes character area
- Potential to restore traditional orchards; strengthen and enhance biodiversity opportunities; introduce more positive land management systems; respect for historic characteristics (see General Notes)
- Poor condition of some farmland areas, tendency towards fragmentation and trend towards urban fringe activities and weakened coherence
- Grade I agricultural soil classification
- Threat of expansion to urban edges on south and west sides, along with gradual, pervasive erosion of rural character



Guidelines

- Restore neglected and abandoned fields to appropriate and sensitive rural land uses – e.g. orchard, woodland, pasture and arable farming; seek to reverse decline in condition of landscape and reinforce rural characteristics
- Improve east/west footpath links between Gillingham and open countryside and footpath links from Twydall
- Introduce regular management of hedgerow boundaries (particularly along rural lanes)
- Discourage conifer planting and other forms of creeping suburbanisation – e.g. inappropriate fencing, gates, ornamental planting
- Resist further built development and introduce more positive landscape management systems
- Consider this area integrally with Riverside Marshes character area for its integral value as a green buffer, wildlife corridor and link to wider countryside

General Notes

- There is considerable variation in the condition of this character area, with some pockets in serious decline and other well managed and cared for areas; area between Lower Rainham and Lower Twydall in generally good condition with urban influences less apparent; area to the east beyond the Rainham urban extension in particularly poor condition with urban fringe and amenity land uses detracting from rural character. Area has high levels of visibility along coastline; inland areas more secluded and screened from views
- There are a number of benefits attached to this area retaining its essentially rural character. It provides a valuable green buffer separating the built up areas of Twydall and Rainham from valuable and internationally protected wildlife sites along Medway estuary; it offers openness and easy access to a countryside area for an extensive urban population; it improves the setting of the A289 along its eastern boundary and provides attractive open views across the marshes and farmland from the railway line and main road; it also improves the setting of the Lower Rainham and Twydall Conservation areas; along with the Riverside Marshes area it provides a distinctive green backdrop when viewed from the Medway estuary
- Historic note. This area has potential for greater understanding of how the marshes and farmland operated as a system and what impact this had for landscape character and the location of settlements. Grange Farm is a major medieval moated site and also had significant Roman archaeology. Along this edge we can anticipate a series of Roman if not earlier estates that are located on creeks between the river and the road network. Important to see movement by water as part of the landscape organisation.

Job Name: Land to the South of Lower Rainham Road, Medway
Job No: 46677
Date: 30th October 2023
Prepared By: A Mortimer
Checked By: G Buxton
Reviewed By: N Fern
Subject: **Future Medway Local Plan (2019-2037) Review – Call for Sites
– Transport and Accessibility**

1. Introduction and Context

- 1.1. Stantec has been appointed by Catesby Strategic Land Ltd to provide supporting transport/accessibility representations towards the Medway Development Plan Review for a potential residential development of up to 400 residential dwellings (and possible primary school) on land south of Lower Rainham Road, Gillingham, Medway, Kent. The note also seeks to examine the potential for wider growth in this area.
- 1.2. Medway Local Plan 2040 is currently at consultation until end of October 2023, with the subsequent steps being for the draft Local Plan to be published and then adopted if approved. Medway Local Plan 2040 will replace the current 2003 Medway Local Plan.
- 1.3. This Briefing Note has been prepared to support the representations for the potential development of the site, specifically in respect of transport and accessibility. This Briefing Note is split into the following sections:
 - Section 2: Site and Surrounding Context
 - Section 3: Policy
 - Section 4: Development and Site Access Opportunities
 - Section 5: Transport Accessibility and Connectivity Opportunities
 - pedestrian and cycle accessibility
 - public transport accessibility
 - access to existing local facilities
 - Section 6: Highway Capacity
 - Section 7: Future Innovation Opportunities
 - Section 8: Pump Lane Application Refusal
 - Section 9: Wider Growth Possibilities
 - Section 10: Summary and Conclusions

2. Site and Surrounding Context

2.1. The site is located on land to the south of Lower Rainham Road, to the south-east of Gillingham and north-west of Rainham, within Medway unitary authority in Kent. The site is currently agricultural / horse grazing use.

2.2. The location of the site is shown in Figure 1.

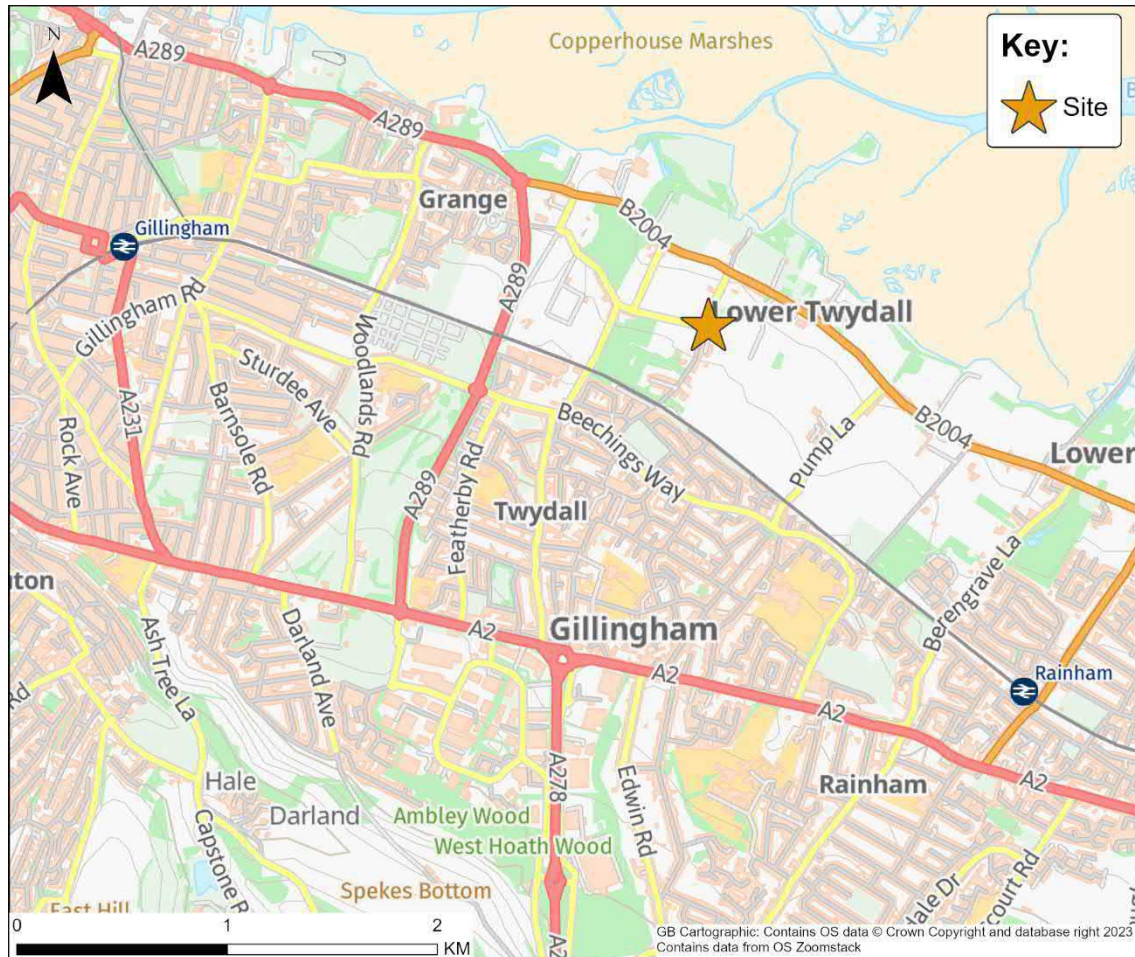


Figure 1 – Site Location

2.3. Lower Rainham Road (B2004) is a single carriageway road subject to a speed limit of 40mph, and connects with Otterham Quay to the south-east and the A289 to the north-west. There is a continuous footway in the northern verge of the carriageway.

2.4. The A289 is a dual carriageway which runs to the north of Gillingham's urban area, through the Medway Tunnel to the north-west. The A289 also runs to the east of Gillingham's urban area, to the A2 to the south.

2.5. Immediately to the north of the site, Riverside Country Park is accessed via a priority T-junction.

3. Policy

3.1. This section summarises planning policies of relevance to the proposed development and the transport improvements which may be associated with it.

Climate Change Action Plan (2022) Medway Council

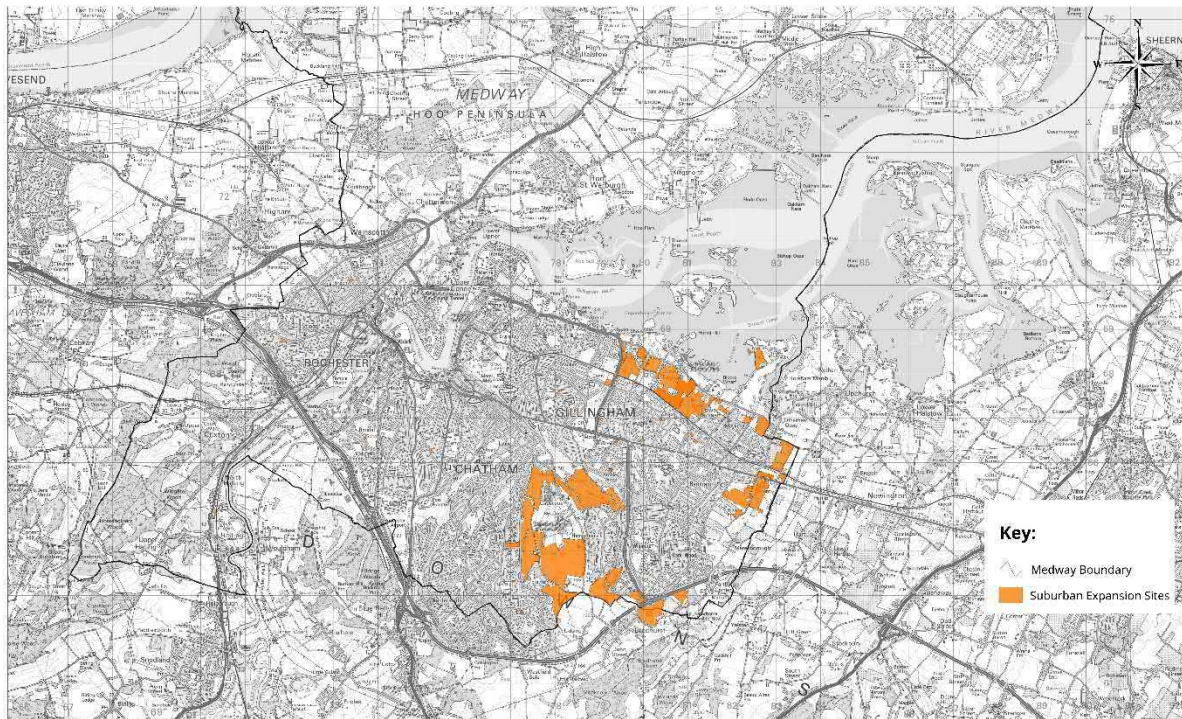
- 3.2. In 2019, Medway Council declared a climate change emergency and set their target to achieve net zero carbon emissions by 2050. Plans to meet this target include expanding the EV charging network to promote EV vehicle take up and developing improved active travel networks through the Active Travel Fund.
- 3.3. The Action Plan also focuses on tackling congestion hotspots by improving traffic light systems and crossings, promoting car sharing and prioritising public transport improvements. With the vision of a low-carbon future, the Action Plan requires new developments to be planned to secure the highest possible share of trips to be made by sustainable travel modes.

Medway Local Transport Plan (2011-2026)

- 3.4. The Medway Local Transport Plan sets out Medway's transport strategy for the period 2011 – 2026. The Plan outlines key interventions of focus including highway improvements to tackle congestion and air quality, expanding the cycling network and improving public rights of way.

Medway Local Plan 2022-2040 Regulation 18 Consultation – Setting the Direction for Medway 2040 (2023)

- 3.5. Published in September 2023, this consultation document was published as part of the new administration taking control of Medway Council. They sought to gauge the views of local people, businesses and other stakeholders with regards to issues including landscapes, buildings and transport.
- 3.6. While the consultation document does not undertake a site-by-site assessment of potential locations for homes or workspaces, it does break down the area into a number of categories to identify broadly where they might be accommodated.
- 3.7. A housing need for over 29,000 homes over the planning period 2022-2040 is cited. The Land Availability Assessment produced by Medway Council has identified land with the potential capacity for around 38,200 homes, broken down into four categories: urban regeneration, suburban expansion, rural development and green belt loss.
- 3.8. The proposed development site south of Lower Rainham Road is highlighted in Map 2 as falling under the suburban expansion category. A number of other nearby sites between Lower Rainham Road and the railway line, east of Gillingham and west of Rainham, also fall into this category, as indicated by Figure 2.



Title: Suburban Expansion Sites

W:\Reg_Env\Plans\Development Plans\Local Plan 2014\Reg 18 2023 - Setting the Direction for 2040\Communications Materials\Maps
© Crown copyright and database rights 2023 Ordnance Survey licence number: 100024225.

Medway
Serving You
Scale: 1:100000 08/09/23
© Medway Council 2023

Figure 2 – Suburban Expansion Sites in Medway Council Local Plan 2022-2040 Regulation 18 Consultation Document (Source: Medway Council)

3.9. The consultation document notes that car ownership in this area is currently higher than elsewhere in Medway, and there is a risk that major development in these suburban locations could generate further dependencies on car-based travel, adding to congestion and pollution. As set out in this technical note, development of large sites could provide opportunities for enhancing sustainable development through the concept of 15-minute cities, whereby communities can benefit from services within a short walk or cycle of their area. New suburban extensions as shown in Figure 2 could therefore provide local services, which reduce the need for residents to travel off-site to access all their facilities. Furthermore, a sustainable design of new developments can promote active travel.

4. Development and Site Access Opportunities

- 4.1. The site could benefit from several access points to the local highway network on Lower Rainham Road, Lower Twydall Lane, Eastcourt Lane, and Grange Road, thus maximising the site's permeability and security of access. These accesses can deliver safe and suitable means of access for all modes.
- 4.2. The main site access points will be via ghost island priority accesses off Lower Rainham Road. As part of the access proposals, there is the opportunity to improve access to the existing Riverside Country Park to the north of Lower Rainham Road. This could take the form of a left/right ghost island stagger priority junction, providing a dedicated safe right turn lane into the Country Park from the east.
- 4.3. The site accesses will also incorporate formal pedestrian and cycle crossing facilities on Lower Rainham Road to provide direct access to the continuous footway in the northern verge, the Country Park and bus stops on Lower Rainham Road.
- 4.4. Access to Lower Twydall Lane will provide access for pedestrians and cyclists to access the existing pedestrian footbridge over the railway lane into Twydall (further details below).

4.5. Access to Eastcourt Lane will also provide access for all modes to the bridge under the rail line.

5. Transport Accessibility and Connectivity Opportunities

5.1. This section identifies the transport and accessibility opportunities of the site, with a key focus on sustainable modes of travel. This section also identifies the access opportunities to key local facilities and amenities e.g. schools, employment locations, etc.

Pedestrian and Cycle Accessibility

5.2. Walking and cycling forms the most important mode of travel for local trips (education, retail, and employment), as well as first and last-mile connectivity. Walking offers the greatest potential to replace short distance car trips of less than 2km, while cycling offers the greatest potential to replace short and medium distance car trips of less than 5km.

5.3. As noted above, there is a continuous footway in the northern verge of Lower Rainham Road. New pedestrian crossing points would be provided across Lower Rainham Road, connecting the site with this footway. As part of any development, there is the opportunity to enhance, upgrade and extend (where possible) this existing footway on Lower Rainham Road.

5.4. This footway provides connections to the wider footway network in the area, enabling access to a wide range of facilities within the local area, referred to later in this section.

5.5. In respect of cycling, the site is located within the vicinity of Riverside Country Park, which provides connections to National Cycle Route 1, shown in Figure 3. This traffic-free cycle route connects with a wider cycle network within Medway, enabling access to the facilities referred to later in this section.

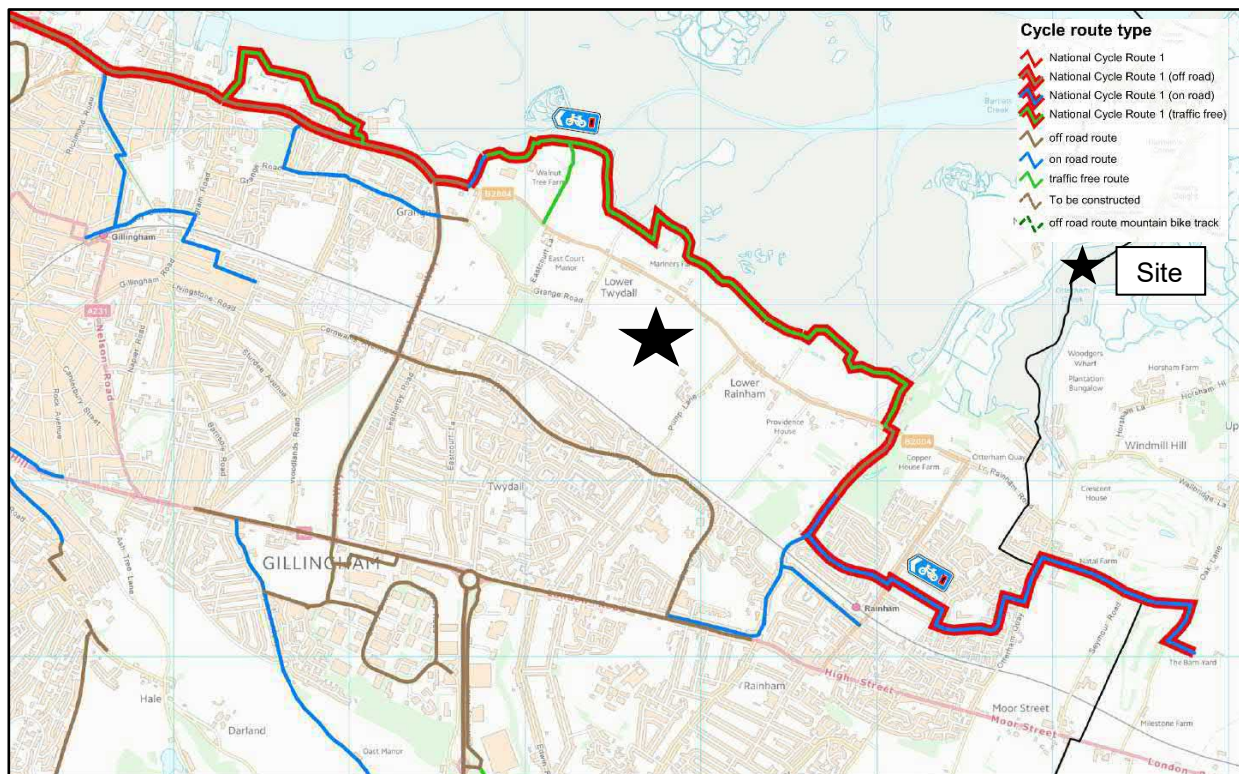


Figure 3 – Medway's cycle routes – Source: Medway Council, with site labelled

- 5.6. In respect of more direct cycle routes, Lower Rainham Road is a 40mph carriageway. On-road cycling on Lower Rainham Road is considered possible for more proficient cyclists, enabling more direct connections to the wider cycle network. The site would be designed to provide a permeable network of internal direct walking/cycling routes to Lower Rainham Road, Lower Twydall Lane, Eastcourt Lane, and Grange Road.
- 5.7. Residents will be able to access Lower Twydall Lane, a rural lane which is a cul-de-sac for motor vehicles, whose access terminates at the railway line. The lane provides access to a small number of residential properties and is considered appropriate to walk and cycle on. At the railway line there is a footbridge providing a connection to facilities in Twydall (see bridge image in Figure 4 and OS map in Figure 5). Cyclists are able to cross the bridge on foot due to the shallow steps, and in future residents of the proposed development could therefore benefit from the existence of this existing link. As part of any proposed development, there is the potential to enhance the attractiveness and pleasantness of this route and bridge crossing, such as providing low-level sensor street lighting, vegetation removal, CCTV, and signage.

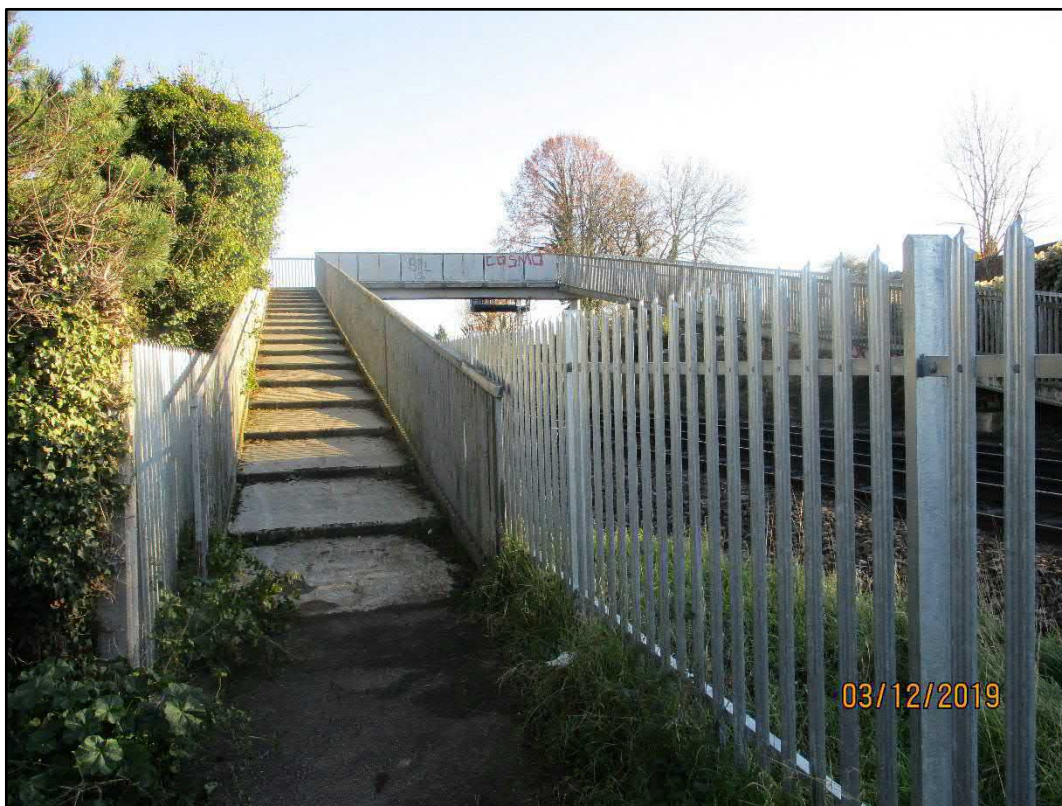


Figure 4 – Footbridge over the rail line off Lower Twydall Lane (Source: Stantec site visit)



Figure 5 – Footbridge over the rail line off Lower Twydall Lane (OS)

- 5.8. In addition, a walking and cycling audit of the wider local area can be undertaken to help to identify suggested improvements to the current walking and cycling facilities (particularly to secondary schools in Twydall).

Propensity to Cycle Tool (DfT)

- 5.9. The Propensity to Cycle Tool is a model combining data from the census, school travel and trip distances to identify where rates of cycling could increase with the provision of improved infrastructure.
- 5.10. The Tool reports the cycling mode share for the 2011 Census Scenario to be 1% for commuting and 3% for school trips in the Medway 023 middle super output area (MSOA). The Tool features data from 2011, however it is noted for comparison that the 2021 Census also reports a 1% cycling mode share among commuters living in Medway 023 and travelling to work.
- 5.11. The Go Dutch Scenario reports a cycling mode share of 14% in MSOA Medway 023. This is by assuming the area to have Dutch style infrastructure with the consideration into the gradient of the area and trip distances. The E-Bike Scenario reports a mode share of 21% and is an extension of the Go Dutch Scenario. This assumes all cyclists own an E-Bike and therefore become more willing to cycle further. Overall, this tool highlights how the baseline cycling mode share of 1% has the potential to increase to 14-21% with the introduction of improved infrastructure.
- 5.12. While these rates of cycling may appear high compared to baseline levels, there is nevertheless potential for the proposed development to lead to increased cycling uptake in the locality:
- The site is located within cycling distance of railway stations including Gillingham and Rainham, making cycling a viable form of travel as part of a multi-modal journey;
 - A number of traffic-free cycle routes run very close to the site, appealing to both recreational and commuting cyclists; and
 - There are opportunities to improve cycle infrastructure at relatively modest cost but leading to tangible benefits (such as the aforementioned footbridge example).

Public Transport Accessibility

Bus Services

- 5.13. Public transport will be the primary focus of any travel demand management strategy at this site in order to reduce the reliance on single occupancy car use.
- 5.14. The site has good potential for public transport accessibility, with two sets of bus stops within the vicinity of the site, along Lower Rainham Road:
- i) approximately 200m west of the eastern site access and 200m east of the western site access; and
 - ii) approximately 150m west of the western site access.
- 5.15. Table 1 summarises the bus services serving these bus stops.

Table 1 – Summary of Existing Bus Services

Service No. (Operator)	Route	Monday – Friday Frequency	Saturday-Sunday Frequency
131 (Nu-Venture)	Twydall – Rainham Railway Station – Gillingham	1 per day each direction	No Service

- 5.16. In addition, there are bus services (101, 116, 182 and 183) routing on Beechings Ways to the south of the rail line in Twydall providing a greater service frequency. Access to these bus services is around a 25 minute walk from the site over the rail line.
- 5.17. Stantec has already had discussions with Medway Council, Arriva, and Nu-Venture regarding a potential public transport strategy for the site. Overall a development of circa 400 homes is forecast to generate 20-30 person bus trips at peak periods based on current Census data and an element of mode shift (see Table 3). The most appropriate coordinated strategy for the site could be as follows:
- i) Arriva Service 1 – services to/from Gillingham and Chatham (town centre, bus station, rail station)
 - Extending Arriva Service 1 on Lower Rainham Road and into the development site.
 - Target frequency of every 20 minutes Monday to Saturday, based on a 7am to 7pm service 6 days a week, including early morning and after early evening services to cater for rail commuters.
 - This will provide a frequent bus service to Chatham town centre, Chatham bus station and Chatham railway station which is key to providing a connection to onward services.
 - The service would require a road loop through the proposed development, or a turning head with a layover point within the development should the service remain on Lower Rainham Road. This would ensure all dwellings are within 400m walking distance of a bus stop.
 - On-site bus infrastructure should include bus shelters with real-time information displays.
 - ii) Nu-Venture Service 131 – services to/from Rainham and Rainham rail station

- There is currently a Medway Council subsidised service 131 operated by Nu-Venture that routes along Lower Rainham Road between Gillingham ASDA, Rainham, and Twydall. This service operates once a day Monday to Friday. From discussions with Nu-Venture, this service could be enhanced and expanded to increase the frequency of this service at peak times to Rainham railway station.

iii) Secondary school services

- There are several secondary schools in Twydall and Rainham accessible from the site, including the Leigh Academy Rainham secondary school off Moor Street in Rainham which recently opened in September 2021. As part of their consent, the Academy are required to develop a standalone bus strategy of how pupils can access the Academy. The site would help facilitate these school bus services to this Academy, and other neighbouring secondary schools.
- Medway Council has also adopted the MY School Bus service, providing local school students who attend schools within Medway with specific bus services to their school destination. A number of these school bus services serve Twydall, and consideration could be given to serving the proposed development as well as part of a coordinated strategy for the site.

5.18. Improving bus services on Lower Rainham Road will also provide accessibility benefits to local residents along Lower Rainham Road, and visitors to/from the Riverside Country Park.

5.19. The public transport strategy will also include information and incentives to encourage residents to use the service. This would include:

- i) Household Welcome Packs for each household containing public transport information;
- ii) Advertising Arriva's smartphone Apps (online tracking, service times, ticketing);
- iii) Providing each dwelling with a pre-loaded Smartcard to provide a few weeks' free bus travel.

5.20. In addition, Medway Council has aspirations to introduce more electric buses due to poor air quality in Medway, particularly through the AQMAs (Air Quality Management Areas). This site, in collaboration with Arriva and Nu-Venture and improving technology, has the opportunity to achieve this objective and provide quiet and clean bus services along Lower Rainham Road.

5.21. Figure 6 shows an example of an electric bus which has been trialled recently in Medway.



Figure 6 – Electric bus trialled in Medway (Source: KentOnline)

Rail Services

- 5.22. The site benefits from being located within the vicinity of Rainham Railway Station, located 2km south-east of the site; Gillingham Railway Station, located 3km north-west of the site; and Chatham Railway Station, 5km north-west of the site.
- 5.23. All three stations are served by a number of rail services towards London (additional stopping trains also serve Gillingham and Chatham only):
- the Rainham to Luton service operated by Thameslink, with a weekday peak time frequency of two trains per hour;
 - the Dover/Ramsgate to London Victoria service operated by Southeastern, with a weekday peak time frequency of two trains per hour,
 - the Dover-London St Pancras International high speed service operated by Southeastern,
- 5.24. An indicative journey time from Rainham to Central London is around 1 hour, but can be shortened to 50 minutes on the high speed service to St Pancras.
- 5.25. With the proposed bus service strategy detailed above, these rail stations could be easily accessible from the site by bus adding further options and opportunities for future residents at the site.
- 5.26. As part of the development the existing cycle storage facilities and capacity at Rainham Station would be reviewed and increased storage capacity offered, where feasible.

Access to Existing Local Facilities

- 5.27. In addition to the locations served by public transport services, which would serve a range of employment, leisure, educational, and health facilities further afar, there a number of facilities and amenities within Twydall that are within walking and cycling distance from the site.
- 5.28. All facilities and amenities within Twydall can be accessed by foot (generally less than a 30-minute walk), and by bike (generally less than 15-minute cycle).

5.29. A plan of the local facilities and amenities is contained in Appendix 1.

5.30. These facilities are summarised below, alongside the distance to the facilities from the centre of the site, and the respective walking and cycling times – assuming a journey speed of 1.4m/s for pedestrians and 5.4m/s (12mph) for cyclists. These speeds are in accordance with Providing for Journeys on Foot (2000) for pedestrians, and Local Transport Note 'Cycle Friendly Infrastructure' 2/08 (October 2018) for cyclists.

Table 2 – Summary of Local Facilities

Facility	Distance (from the centre of the site)	Walking Time	Cycling Time
Beechings Way Industrial Estate	1,120m	13 minutes	4 minutes
Twydall Post Office	1,280m	15 minutes	4 minutes
SPAR, Twydall	1,440m	17 minutes	5 minutes
Featherby Infant and Nursery School	1,760m	21 minutes	6 minutes
Twydall Primary School	1,920m	23 minutes	6 minutes
Rainham Mark Grammar School	2,080m	25 minutes	7 minutes
The Academy of Woodlands	2,240m	27 minutes	7 minutes
Iceland/Aldi/Tesco (A2)	2,560m	30 minutes	8 minutes
Robert Napier Secondary School	2,720m	29 minutes	9 minutes
Gillingham Business Park (A2)	3,040m	36 minutes	9 minutes
Rainham Rail Station	3,200m	38 minutes	11 minutes (3,700m)
Rainham High Street (inc. Rainham Medical Centre)	3,520m	42 minutes	11 minutes

5.31. Most of the facilities and amenities within Twydall would be accessible via Lower Twydall Lane and the bridge over the rail line connecting to Beechings Way and the network of footways and cycleways.

5.32. With reference to the IHT's 'Providing for Journeys on Foot' (2000), Table 3.2 contains suggested acceptable walking distances for pedestrians without a mobility impairment for some common facilities. For schools, the 'Preferred Maximum' walking distance is stated as 2,000m. In summary:

- i) **Primary schools** – Featherby Infant and Nursery School, and Twydall Primary School are within a 2km walking distance (less than 24-minute walk) from the centre of the proposed site.

In addition, there is the possibility of providing a new primary school on the site to serve the development and surrounding area which would further reduce the walking distance. A community hub with retail unit are also proposed onsite.

- ii) **Secondary schools** – Rainham Mark Grammar School is only marginally over 2,000m from the site (at 2,080m) and this could be reviewed once the proposed layout and accesses are finalised. There is also the recently built Leigh Academy Rainham secondary school off Moor Street in Rainham which opened in September 2021 (around 4km from the proposed site). However, it should be noted that the discussions to date in relation to enhancing bus service provision have focused on services towards Chatham and not Rainham, meaning that Leigh Academy would likely require additional school transport to be accessible from the site.

Travel Patterns

- 5.33. Census data shows where those who usually reside in Medway travel to work. The most recent dataset issued is from 2021, however travel patterns from this period were affected by Covid-19 compared to the previous census in 2011. On the other hand, an element of the travel patterns arising from Covid-19 persist even at the time of writing (October 2023) such as increased levels of home working, meaning that the 2021 Census remains relevant.
- 5.34. Figure 7 below shows the travel to work travel patterns for residents of MSOA Medway 018, in Twydall, which has been chosen as an example. The line thicknesses are in proportion to the commuter demand and, as shown in the figure, the majority of residents work locally, with a focus on employment hubs such as Gillingham Business Park. There is also a pull to several specific areas further afield, notably in London.

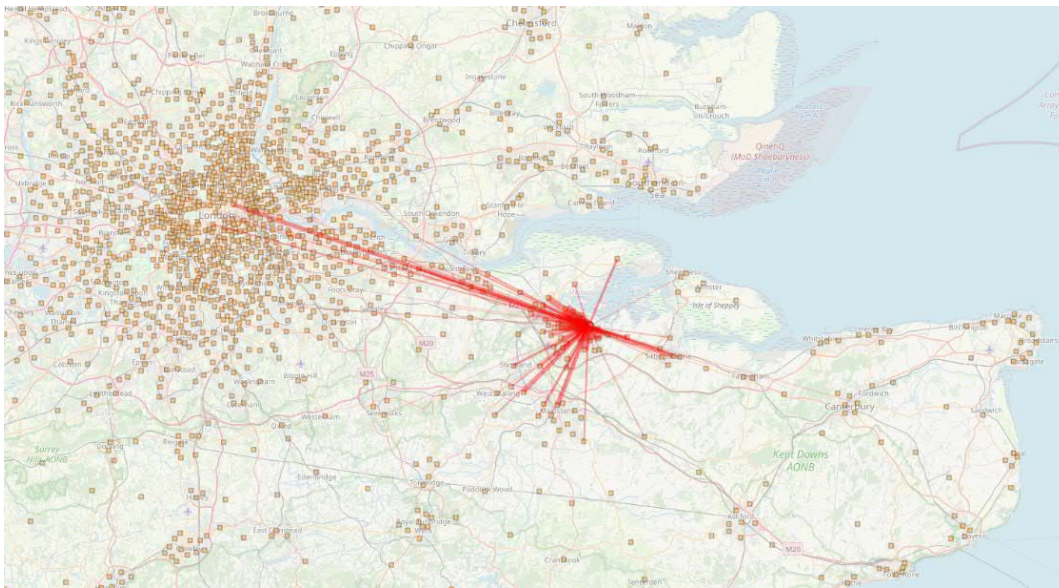


Figure 7 – Plot of Travel To Work Data from MSOA Medway 018 Based on 2011 Census data Origin-Data (Source: Oliver O'Brien & James Cheshire (2016) *Interactive mapping for large, open demographic data sets using familiar geographical features*, *Journal of Maps*, 12:4, 676-683 DOI: 10.1080/17445647.2015.1060183)

- 5.35. Figure 7 highlights where transport measures could be targeted to achieve the greatest impact in connecting residents of the proposed development to workplaces. Enhanced connectivity to Gillingham and Chatham, for example, could benefit not only those people who work in the town but also those workers based in London who commute from its station. It should be noted that the data in Figure 7 is based on 2011 Census data which predates Covid-19 and consequently there may have been a shift in commuting patterns; nevertheless the map illustrates which flow patterns were more popular.

Travel Modes

- 5.36. The method of travel to work data from the 2021 Census was analysed for residents of three wards around the proposed site location (Gillingham North, Rainham North and Twydall).

Table 3 – Method of travel to workplace – 2021 Census Table TS061 – Wards: Gillingham North, Rainham North and Twydall (Source: ONS)

Method of travel to workplace	Percentage of residents 16 and over in employment
Work mainly at or from home	24%
Underground, metro, light rail, tram	0%
Train	5%
Bus, minibus or coach	3%
Taxi	1%
Motorcycle, scooter or moped	1%
Driving a car or van	51%
Passenger in a car or van	6%
Bicycle	1%
On foot	8%
Other method of travel to work	1%
Total	100%

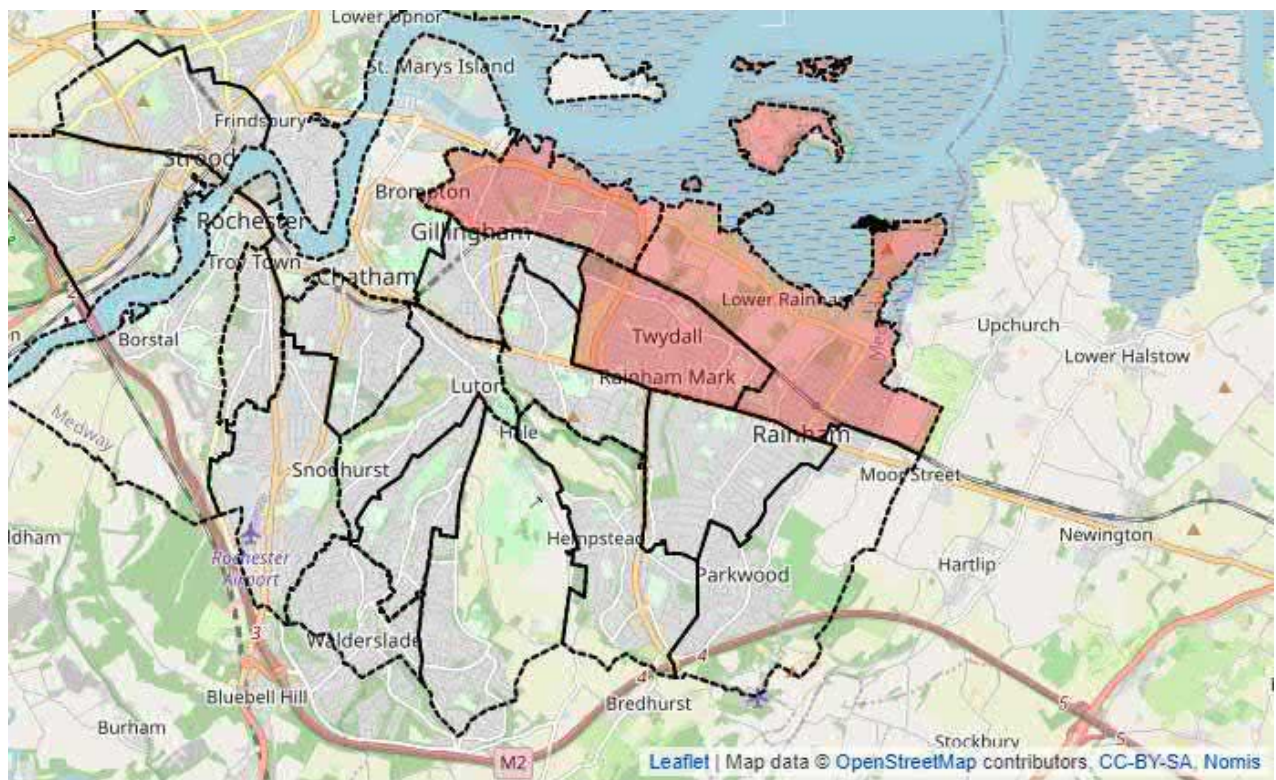


Figure 8 – Map of 2022 wards Gillingham North, Rainham North and Twydall (Source: Map data © OpenStreetMap contributors, CC-BY-SA, Nomis)

5.37. Table 3 shows that the majority (51%) of residents in employment in the three sampled wards drive to work, with a further 6% being passengers. 24% work from home. Uptake of public transport modes is more modest, totalling less than 9%; however it is noted that there is already a level of walking (8%) to work.

- 5.38. The results in Table 3 indicate that there is potential for the proposed development to work on measures to promote car sharing, as a way to reduce the overall level of single-use car trips. It also provides good evidence that walking would be a viable mode of travel for commuting to and from the site.

Trip Banking

- 5.39. If a range of area-wide, high-quality sustainable travel initiatives can be delivered to encourage a reduction in car travel in favour of other modes, the vehicle trips generated by a proposed development can be offset by those overall reductions (or 'credits') on the wider network – the concept of 'trip banking'.
- 5.40. As shown in Table 3, the rate of car trips amongst the local population travelling to work is high; therefore, if the aforementioned improvements in bus connectivity were to encourage greater use of public transport by people living along the route of buses earmarked for enhancements, this could help to offset any car trips generated to and from the proposed development site, especially those journeys serving locations more inaccessible by sustainable modes.

School Travel Plans

- 5.41. The introduction of effective school travel plans (STP) has the potential to greatly reduce congestion at peak times. STPs comprise a range of measures to encourage staff, students and parents to travel sustainably to and from school.
- 5.42. Consideration could be given to the use of innovative platforms such as HomeRun, which has been successfully used by families and staff in other locations to identify better ways to travel to and from school. This includes organising car shares and providing information on walking and cycling routes and public transport.
- 5.43. Apps such as HomeRun are now being developed to implement travel plans at both individual schools, and across a programme of local schools to one another.
- 5.44. HomeRun seeks to minimise trips made to schools via the private car, through monitoring travel patterns of students through information provided by parents, before facilitating measures to encourage modal shift, focussed on modes / measures which are well received by parents through voting polls. To date, an average of 30-50% of parents utilise the app from schools in the programme, with mode shift away from the private car at 26%.
- 5.45. Opportunities such as these may be implemented in due course in Medway, which would strengthen mobility options to schools from the site.

6. Highway Capacity

- 6.1. To fully understand the likely impact of the development on the local (and strategic) highway network, any planning application would be accompanied with an assessment of the development proposals within Medway Council's strategic transport model (AIMSUN). This would make reference to a cumulative scenario that would include other surrounding committed developments, other Local Plan allocations, and general background traffic growth. Appropriate and proportionate mitigation would be considered at locations where, as a result of the development, any identified highway impacts are deemed to have a detrimental effect on the safe and efficient operation of the highway network.

Lower Rainham Road

- 6.2. Since the main site accesses would be to Lower Rainham Road, existing traffic count data was collected in the local area in early February 2020 (prior to the onset of Covid-19 and the national lockdown period).

- 6.3. An Automatic Traffic Count (ATC) was installed on Lower Rainham Road outside the proposed site for a period of two weeks during a neutral period. The results of the ATC data are summarised below, as average traffic flows during the two-week period (this relates to a 5-day average, excluding weekends which would lower the average):

Table 4 – Summary of Lower Rainham Road ATC (February 2020)

Lower Rainham Road	AM Peak Hour (8-9)	PM Peak Hour (17-18)	Standards for Highways UAP3 6.75m width
Westbound	609	306	1,100 busiest direction
Eastbound	196	518	733
Two-way	805	824	1,833

- 6.4. The data from 2020 in Table 4 shows that Lower Rainham Road carries around 800 vehicles two-way during each of the peak hours.
- 6.5. To understand the likely overall maximum link capacity of Lower Rainham Road (i.e., how much spare link capacity is available), reference has been made to the Standards for Highways (SfH) Generals Principles document. This provides the one-way hourly capacity for different road classifications (UAP – Urban All-Purpose roads). Lower Rainham Road would be classified as a UAP3 “variable standard road carrying mixed traffic with frontage access, side roads, bus stops and at-grade pedestrian crossings”. Lower Rainham Road has a varying width between 6-7m.
- 6.6. A UAP3 road of 6.75m width has a maximum two-way link capacity of 1,833 vehicles, with the busiest direction of flow at 1,100 vehicles.
- 6.7. To understand the likely overall maximum link capacity of Lower Rainham Road (i.e., how much spare link capacity is available), reference has been made to the Standards for Highways (SfH) Generals Principles document. This provides the one-way hourly capacity for different road classifications (UAP – Urban All-Purpose roads). Lower Rainham Road would be classified as a UAP3 “variable standard road carrying mixed traffic with frontage access, side roads, bus stops and at-grade pedestrian crossings”. Lower Rainham Road has a varying width between 6-7m.
- 6.8. A UAP3 road of 6.75m width has a maximum two-way link capacity of 1,833 vehicles, with the busiest direction of flow at 1,100 vehicles
- 6.9. Based on the recorded ATC data from Lower Rainham Road in February 2020, the road has ample link capacity available to accommodate additional traffic volumes.
- 6.10. As previously set out in section 3, the Local Plan 2022-2040 Regulation 18 Consultation Document states that Medway Council is working with neighbouring authorities and other stakeholders to prioritise action on improving the M2 Junction 1. The junction is an important regional and local traffic interchange and experiences congestion, therefore proposals to improve it would be expected to have wider beneficial impacts on the traffic network which can help to relieve the congestion that occurs at peak periods, both at the junction itself and on the wider network too.

7. Future Innovation Opportunities

- 7.1. In addition to the site’s connectivity opportunities outlined above, the current and future innovations in transport technology and changing working / shopping habits in a post-Covid-19 era also offer great opportunities to develop a sustainable community.
- 7.2. The notable shift to home working since the Covid-19 pandemic has resulted in a change in travel behaviour with fewer people choosing to commute to work at peak times every day.

- 7.3. Ways of working are changing rapidly, with home working, flexible work patterns, the gig economy and freelancing becoming more common as technology allows for enhanced communication, with the potential for radical changes to spatial planning as 'the commute' becomes a less significant in determining where people choose to live.
- 7.4. A transport strategy containing many of the elements and opportunities listed below is considered essential to the delivery of a sustainable community and reducing the number of vehicles on the highway network:
- e-bikes and e-scooters (with electric charging hub facilities on site)
 - electric vehicles (household electric charging stations)
 - autonomous / semi-autonomous vehicles
 - Mobility as a Service (MaaS)
 - smart autonomous deliveries / autonomous pods / drone delivery
 - parcel lockers
 - 5G / superfast broadband networks
- 7.5. The above opportunities can assist in reducing not only car trips but also servicing as well. This is evidenced by Voi, who found 36% of users to have reported their car use to have drastically decreased since using micromobility services such as Voi (e-scooters and e-bikes).
- 7.6. Also, autonomous delivery vehicles have been trialled in several areas across the UK, used to complete 'last mile deliveries'. A survey conducted by Cambridgeshire County Council found 80% of participants agreed that using this technology had reduced their car journeys to collect groceries. Additionally, a trial was completed in Cambourne, a village in south Cambridgeshire. From this, it was reported that over 7000 miles of car journeys had been saved within the first month of the trial resulting in an estimated 1,670kg reduction in CO₂ emissions. This indicates the impact that new technologies can have on generating a transport mode-shift.
- 7.7. While Medway is currently not part of an e-scooter trial area, there is the possibility that this technology could be extended to Medway in future. In the meantime, as described above, existing technologies across both the freight and passenger movement sectors have the potential to reduce single person vehicle trips at Lower Rainham Road, for example through freight consolidation (if a parcel locker is installed), or by offering e-bikes charging stations.

8. Pump Lane Application Refusal

- 8.1. In November 2021, planning application MC/19/1566 for the proposed development off Pump Lane was refused planning permission on appeal. This site is located a short distance to the east of the applicant's proposed site, and has relevance for the approach to be taken to the proposed application with regards to highways and transport matters.
- 8.2. The appeal letter (reference APP/A2280/W/20/3259868) cites a number of reasons for recommending that the applicant's decision (against the original decision to refuse permission) be dismissed. Amongst these, paragraphs 28 to 32 focus on highways matters.
- 8.3. The appellant had proposed a different method for assessing traffic impacts compared to the inspector, with the former favouring individual junction assessments while the latter favoured a network-wide approach using the local authority's strategic Medway Aimsum Model (MAM). The appellant had argued that the traffic impacts of the development would be concentrated on the junctions closest to the site, hence modelling junctions in isolation could be justified; however, while the Secretary of State sided with the appellant in agreeing that it is appropriate to focus on the areas of greatest traffic impact to assess the scheme, the Secretary of State (SoS) did not agree with the appellant regarding which method should be used to assess this. The SoS found that the impacts were greatest in the peak hours, and the subnetwork forms part of a wider network; however, this did not mean that the impacts could not be considered severe in their context.

- 8.4. With regards to the proposed application site south of Lower Rainham Road, it can therefore be considered that a modelling approach using the MAM would be recommended compared to an individual junction approach, which has been part of an unsuccessful application on a nearby site. Early liaison with the local planning authority to scope the highway modelling approach can be undertaken, in order to seek agreement with regards to an area to assess.
- 8.5. The SoS agreed with the Inspector's findings in terms of there being no harm with regards to highway safety.
- 8.6. In conclusion, while highways matters were cited as part of the refusal for the Pump Lane planning application, there are a number of points which could be addressed positively as part of the proposed development at Lower Rainham Road. The latter scheme envisages significantly fewer homes (400) than were proposed at Pump Lane (1,250), and consequently the highway impact would also be expected to be less, not just in terms of the vehicular trip generation but also the geographical extent across which their impact would be felt on the network. This should also facilitate early agreement with the local authority with regard to the method and extent of highway modelling required.
- 8.7. In the intervening period since the Pump Lane application was lodged, travel patterns have changed as a result of Covid-19 (as described elsewhere in this technical note). There is therefore greater likelihood that, thanks to more modern home working and hybrid working practices, as well as the increasing availability of emerging mobility technologies, the number of vehicular trips generated may not be so high as was historically the case for a development of that size. As a result, the traffic impact during peak hours – which was the period when Pump Lane had its greatest impact in the report – may be lessened.

9. Wider Growth Possibilities

- 9.1. As shown in Figure 2, the proposed site south of Lower Rainham Road can be seen in the context of a range of potential sites identified by Medway Council in its close vicinity which could deliver housing.
- 9.2. The fact that multiple sites have been identified in close proximity could offer a number of transport-related benefits in the event that several of these come forward for delivery:
- i) **Internalisation of trips:** each development would experience a degree of internalisation of movements (i.e. journeys not going outside the boundaries of the site) thanks to the attractiveness of on-site facilities. The proposed site south of Lower Rainham Road individually, for example, is proposed to include a community hub with retail unit, and this would be within easy walking distance of all homes. However, when one considers neighbouring proposed developments as well, each with their own ancillary non-residential land uses as well, there is potential for even greater collective internalisation of trips (i.e. journeys which do not go beyond the collective boundary of the nearby sites). As an example, if a nearby site were to feature a café, this would also be easily accessible on foot from the Lower Rainham Road site, and vice versa residents of the other site would be likely to visit the retail hub at Lower Rainham Road on foot.
 - ii) **Bus service viability:** section 5 describes the existing bus services in the vicinity of the Lower Rainham Road site and potential improvements which could come forward. If several housing sites were to come forward along the same bus corridor(s), it would enhance the case for these improvements since the patronage of the routes would increase, thus boosting the economic case for increasing frequency and/or operating hours.
 - iii) **School buses:** linked to the above point, if multiple residential sites were to come forward, it can be assumed that they would be home to a greater number of school-age children, and older children may be more likely to travel to existing nearby schools to study. As described in section 5, existing secondary schools are focused around Chatham and Rainham. Providing school buses to connect developments in this neighbourhood to these towns at school times could therefore be more efficient if multiple residential sites come forward in close proximity.

- iv) **Collective infrastructure improvements:** each development will agree with the local authority a contribution to be made towards local facilities (a section 106 agreement). The amount and purpose of the sum to be paid by each developer would be negotiated separately; however, there are shared benefits which can be achieved when a larger funding pot can be supported by multiple developments, each of whose occupiers (as well as the wider area) then benefit from the services and infrastructure selected. As an example, if a single site is developed, section 106 funding might contribute to more modest pedestrian / cycling improvements close to the site; but if several are developed, each can then contribute funding, leading to a wider range of improvements which then give rise to a greatly enhanced pedestrian and cycle network, benefiting the occupiers of all the developments.

9.3. In conclusion, there are a number of benefits taking the form of economies of scale which could see wider growth possibilities for the site south of Lower Rainham Road. It is noted also that the suburban expansion sites highlighted in Figure 2 collectively were identified by Medway Council as having the potential to deliver 9,680 homes and, while not all of these may necessarily come forward, they are located in relatively close proximity both to one another and to the existing urban centres of Chatham, Gillingham and Rainham. These are accessible locations by a variety of modes of transport, and as described above there is the potential to enhance this accessibility through the delivery of multiple sites in close proximity.

10. Summary and Conclusions

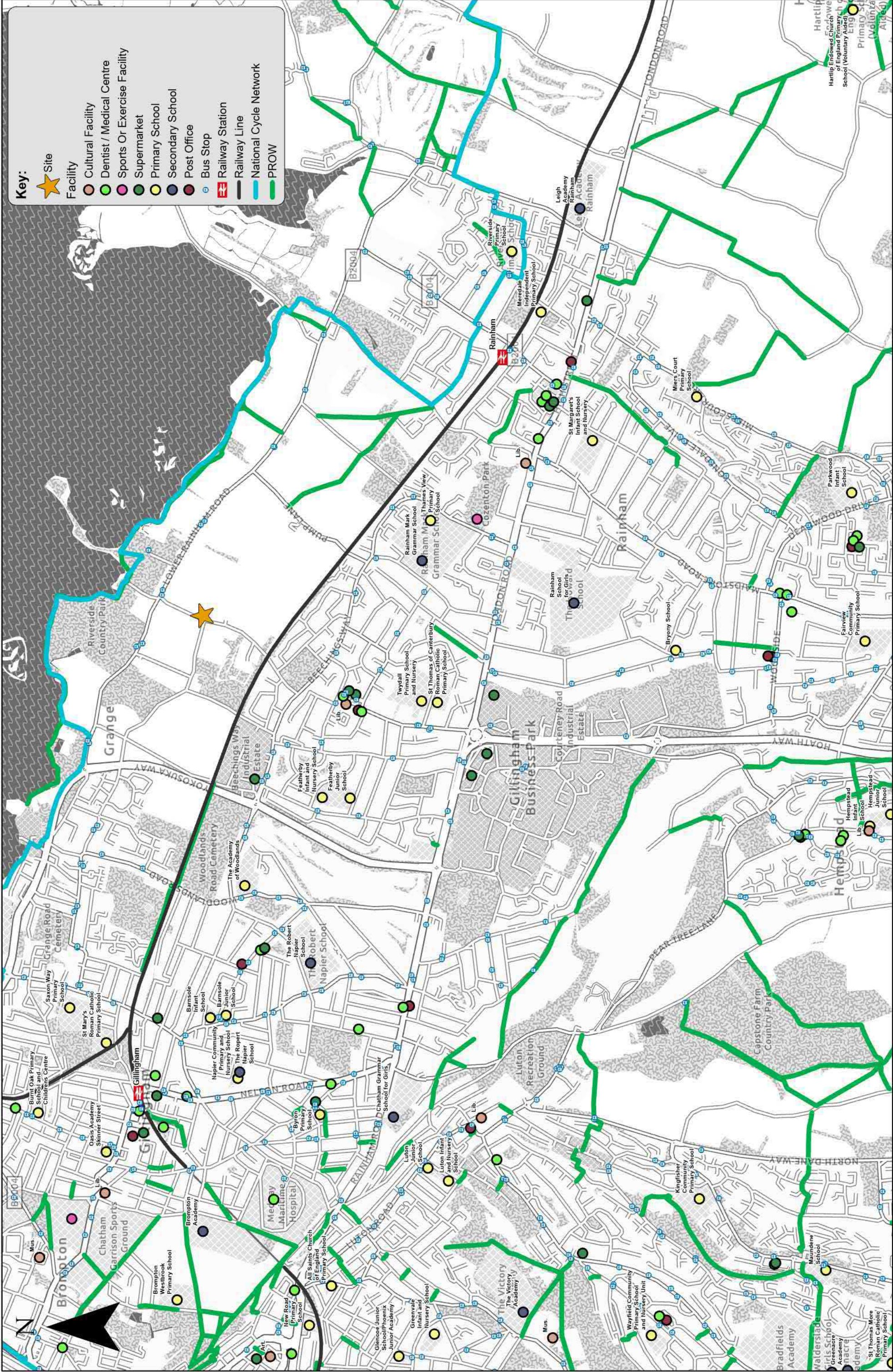
- 10.1. This Briefing Note has been prepared to support representations to the Medway Regulation 18 Local Plan Consultation with particular regard to the land south of Lower Rainham Road, which has the potential to sustainability accommodate 400 dwellings. This Briefing Note has provided background to the site and wider area in respect of current and future potential transport and accessibility opportunities.
- 10.2. Overall, the site has good access to local facilities within the local area of Twydall. The site is also on the periphery of Medway's cycle network, with a number of routes available within the vicinity of the site.
- 10.3. The site also benefits from good opportunities for public transport connections as well as National Cycle Route 1. The location of the site in respect of the local railway stations within cycling distance from the site provides opportunities to access a wide range of towns without the use of the private car.
- 10.4. As part of the next steps, Catesby would be keen to discuss the accessibility and transport considerations at the site. Discussions held to date with local bus operators can be further developed to explore the opportunities available for serving the site by scheduled bus route and, in addition, these discussions can be extended to include school buses. A more formal audit of walking and cycling routes to key locations could be undertaken in order to identify locations which would benefit from delivery of upgrades as part of the delivery of the development. There are good opportunities for Lower Rainham Road and other nearby potential sites to benefit mutually from shared transport services and infrastructure in the event that they come forward for housing delivery. Finally, with regards to highway modelling, early liaison with the local planning authority can be undertaken to scope a mutually agreeable approach, subject to the quantum of development and parking which is proposed for the site.

DOCUMENT ISSUE RECORD

Technical Note No	Rev	Date	Prepared	Checked	Reviewed (Discipline Lead)	Approved (Project Director)
46677/5513/TN001	001	29/06/2020	J Williams	N Fern	N Fern	N Fern
46677/5513/TN001	002	24/10/2023	A Mortimer	G Buxton	N Fern	N Fern
46677/5513/TN001	003	26/10/2023	A Mortimer	G Buxton	N Fern	N Fern
46677/5513/TN001	004	27/10/2023	A Mortimer	G Buxton	N Fern	N Fern
46677/5513/TN001	005	30/10/2023	A Mortimer	G Buxton	N Fern	N Fern

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

Appendix 1 – Local Facilities and Amenities Plan



Lower Rainham Road, Medway
Map of Facilities

Client
Catesby Estates plc
part of Urban4City



1:20,000 @ A3

Date: 23/10/2023

Drawn: BK

Checked: GB

Appendix 1

Rev A