

Medway Local Plan 2040 – Regulation 18 Consultation

October 2023

Consultation Response

Cliffe and Cliffe Woods Parish Council

1.0 Summary

1.1 The parish council recognises the need for an up-to-date Local Plan and the previous attempts to adopt a new plan to replace the existing 2003 Local Plan. Across the plan area, the lack of a plan, the need to define a 5-year land supply for housing and a suitable build-out rate has led to a developer-led expansion of housing, without all of the required infrastructure development before, during or after the housing provision. There has been delays to the provision of school spaces, with the Cliffe Woods school at capacity and the Cliffe school nearing capacity. Necessary road improvements to cater for this growth have been slow to respond. All this at a time when there has been more pressure on medical service provision with a move away from face-to-face appointments to online and phone contact that is not suitable for many residents has not demonstrated the capacity to cope with current demand, let alone any increase in population.

1.2 We recognise that a Local Plan can deliver potential sites for the required infrastructure, but the current economic environment and lack of local, regional, and national funding has meant difficulties in providing this. Although new buildings and extensions can be provided, the need for suitably trained and qualified staffing is also a serious concern and it is noted that this is a national problem (e.g., Doctors require 6 years training, and the existing pipeline will struggle to cope with doctors' retirement projections, let alone the population growth and schools will require a mix of qualified and new staff).

1.3 Previous Medway Local Plans have led to a step change in infrastructure provision with a major investment in road infrastructure, but even this now has serious problems with congestion and air quality. Since previous plans the cost of new infrastructure has ballooned and above the economic scale of local developers and with the priority of house building, permission is often granted without the required infrastructure. There needs to be an urgent need to investigate into [LAND VALUE CAPTURE](#) a method of capturing some of the increase in land values that development brings for larger developments and its suitability for individual or combinations of developments across Medway or in specific areas, to provide key infrastructure improvements (perhaps at smaller scale as well) in the absence of any [Community Infrastructure Levy scheme](#).

1.4 Use of the Hundred of Hoo Freight Railway for passenger traffic could help alleviate some of the pressures, especially if a curve at Hoo Junction to Strood/Maidstone/Rochester/Chatham etc. could be provided.

1.5 The Medway Towns has one of the largest populations in the South East, outside London, but is still expected to take its share of the regional growth – however this is on top of the existing provision!

2.0 Cliffe and Cliffe Woods Neighbourhood Plan 2022-2040

2.1 The Neighbourhood Plan was adopted in May 2023 and is therefore the most up to date planning development of the local area and identifies a Design Code and policies that indicate the issues that need to be addressed in any future development. It identifies the constraints with existing Community Infrastructure and severe limitations (especially in Cliffe) that lead to further pressure in the road network as public transport interventions have not proved viable in the past and led to a growing use of car and van trips for basic needs. The road is already busy serving large lorries to the Salt Lane employment area and Child's Farm in Cooling.

2.2 The Neighbourhood Plan identifies built-up village boundaries that need to be respected (especially with over 3 Year Housing Land Supply currently and the full 5-year provision will be identified in the proposed Medway Local Plan 2040), any developments outside the boundary must be allocated as Rural Exception sites where special policies apply.

2.3 National Planning Policy Framework (NPPF) indicates the importance of a Neighbourhood Plan when adopted and impact on Planning Policy for the plan area.

3.0 Land Availability

3.1 Existing Pipeline

There is already an existing pipeline of developments that are only referenced by their housing numbers but not their areas and impact. They are not included in any Regulation 18 consultation maps. These have caused significant issues during their development (severe disruption to the road network as access and utility infrastructure is developed).

Developments have recently completed West of Town Road, Cliffe Woods, underway on the Redrow Site also to the West of Town Road and two permissions granted on the South of View Road, Cliffe Woods. An appeal decision is awaited on a 250-home development in Cliffe with a relocation of the APCM sports ground.

3.2 Call for Sites

The Neighbourhood Plan has an adopted policy of maintaining the gap between the Cliffe and Cliffe Woods villages and this would apply to any proposals for land North of Merryboys Lane in Cliffe Woods to Cliffe. It is recognised that limited development may come forward for existing housing sites in the land between Cliffe and Cliffe Woods, subject to Neighbourhood Plan policies, including Design Code.

A proposal for the infill of Omya Lake on Salt Lane/West Street (2m Tonnes of inert waste to infill the lake over c. 7 years) has been submitted. Unless this can use the River Thames or the Brett Rail Sidings, the pressure on the B2000 (and the A289 Bypass junction) and impact on local communities would be severe.

3.3 Pressure on Road Network outside of the Parish Area

Development proposals that feed additional traffic onto the B2000 will need to be resisted due to the existing pressures on the A289 Wainscott Bypass (to/from London direction), Hollywood Lane to the Four Elms Roundabout and on local urban roads to Strood (Cooling/Bill Street Road and Cliffe Road).

The design of the A289 junction is such that it drives traffic onto local roads to Strood, Medway Tunnel and Hoo through the Four Elms and Sans Pareil roundabouts. A rat run through Dillywood Lane and the military roads at Chattenden for traffic on the A289 towards the Four Elms roundabout has already developed and traffic to Wainscott/Frindsbury will often leave the junction in the Cliffe direction and U-turn at a residential access to skip the queues awaiting an easterly exit off the bypass – this would need an improved junction on the A289 at the B2000 to allow traffic to join/exit in the Four Elms roundabout direction and further improvements at the Four Elms roundabout itself.

We are concerned regarding the concern raised by Highways England regarding M2 Junction 1 and note that further pressure is proposed at this location if the Lower Thames Crossing is built.

Cllr Chris Fribbins, Cliffe and Cliffe Woods Parish Council
chris.fribbins@cliffeandcliffewoods-pc.gov.uk

Medway Local Plan

Via email futuremedway@medway.gov.uk; planning.policy@medway.gov.uk

30th October 2023

RE: 2023 Medway Local Plan Reg 18 consultation

I am responding to this consultation on behalf of The British Horse Society, the UK's largest equestrian charity with over 120,000 members, representing the country's 3 million horse riders.

Key information

- **Over 4000ⁱ passported horses** are owned by people living in Medway postcodes, contributing in excess of **£24 millionⁱⁱ** per annum to the economy, much of which is likely to be spent locally (feed, bedding, farriers, vets, riding instructors and riding schools, etc.). Within the Medway UA area, there are two BHS approved riding schools (and another on the border in Chatham) who also provide employment in the area and produce future riders and horse owners. Livery yards, not needing a license, are less detectable but vast numbers of horses are kept on the urban fringes, and in amongst, the most densely populated areas of Medway. We are aware of at least a dozen large livery yards but there are many more, smaller and informal yards in the area.
- Nationally, horse riders have the right to access just **22% of the public rights of way network**, with substantially less for carriage drivers. In the rest of Kent, horse riders have just 16.7% and carriage drivers even less. Many of these routes are inaccessible or disconnected as a result of increased traffic and/or development.
- Research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Societyⁱⁱⁱ found that
 - More than two thirds (68%) of respondents participated in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimates that **such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity**.
 - A range of evidence indicates the vast majority (90% plus) of horse riders are female and more than a third (37%) of the female riders of respondents were above 45 years of age. **Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.**
 - Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.
 - **Horse riders with a long-standing illness or disability** who took part in the survey **are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability.**
- In 2022 alone, 26% of riders reported being victims of road rage or abuse. 139 reports of rider injury were made to the BHS. The NHS Admitted patient statistics indicate that this is substantially higher with **2883 emergency admissions^{iv}** arising from "Animal-rider or occupant of animal-drawn vehicle injured in transport accident"

Planning Policy, etc.

National Planning Policy Framework

- Paragraph 98 states that, “Access to a network of high quality open spaces and **opportunities for sport and physical activity is important for the health and well-being of communities...**” Providing for equestrians helps to fulfil this requirement
- Paragraph 100 says, “Planning policies and decisions **should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.**” The inclusion of equestrians within these enhancements and improved links only improves the value for money of such undertakings.

Medway Rights of Way Improvement Plan (ROWIP) (2020-2030)

*“More ‘higher status’ routes and address the needs of horse riders - More bridleways, byways and restricted byways and better-connected routes will help horse riders, cyclists and motorised vehicle drivers (byways only). **New routes coming from housing development should allow as many types of users as possible.** Issues including fly tipping, overgrown routes, busy and dangerous roads, better crossing points or paths on verges and better gates and surfacing also need to be addressed”*

*“Medway’s public rights of way network **has a lower proportion of paths with higher rights (bridleways, byways and restricted byways) than both the Kent County Council area and the national public rights of way network.** The deficit is due to a lower proportion of bridleways. Priority areas identified by equestrians include areas around Upchurch, Rainham, Hoo St Werburgh, Cliffe and the Hoo Peninsula. Routes with higher rights not only provide access for horses, but can provide safe, traffic-free routes for cyclists. **Where any new routes are proposed, routes providing higher rights will be sought as a preference.** Some of these routes link to major roads creating further barriers to their use due to safety issues. This is particularly the case around Hoo St Werburgh. Although other routes link to minor roads, with an increase in population, some of these routes are busy and are used as ‘rat-runs’. Three of the routes on the Hoo Peninsular are also dead-end routes and do not link to roads or other rights of way. The council will seek to improve the connections of routes with higher rights, either through new routes or upgrading footpaths to higher status routes. The council will seek to improve the safety of users through better connections, crossing and exit points and signage. It is also important that new development and any resulting changes to the road network and increased traffic does not further decrease the length of route available or make use of the routes less safe”*

“Horse riding and horse carriage driving make a valuable contribution to rural life and the rural economy.”

It is clear that Medway understands the need to improve the provision, and connectivity of, higher status routes within the Authority.

It is evident from a health & well-being viewpoint, as well as an economic one, that the Authority should include the needs of equestrians in every aspect of their plan but *in particular* those aspects involving active travel and health and wellbeing. *Most* walking and cycling journeys are made for leisure purposes and *most* journeys on horse-back or in a horse and carriage are also made for leisure purposes. Active Travel simply means using an active means of getting from A to B. It should not preclude equestrians because few can ride or carriage drive to work or school.

Specific areas in the plan

2. Context

2.4 *The Plan must address big issues for Medway – [...], health and wellbeing, boosting the economy [...]*

Making policies inclusive of equestrian will aid the council in fulfilling its aspirations.

3. Vision for Medway in 2040

“Medway is a healthy place in which to live and work. People can move around more easily, with good walking and cycling links and clean air. All sectors of the community can enjoy the outdoors, with spaces designed for play, leisure, access and rest. People have a choice of affordable and healthy food and can grow their own. Public spaces are inclusive, designed with care and imagination for all to share. People can meet most of their daily needs in their local area, such as schools, grocery shopping and places to socialise and exercise.”

Whilst we welcome this vision, inclusion of equestrians for all the reasons stated under key information will provide a big step towards seeing it succeed.

4. Strategic Objectives

“4.2 Prepared for a sustainable and green future

- *To strengthen and develop transport networks providing safe and effective choices for sustainable travel, including improved opportunities for walking and cycling and enhanced public transport services, and management of the highways network, with associated improvements in air quality.*
- *To secure a robust green and blue infrastructure network across land and water that protects and enhances the assets of the natural and historic environments in urban and rural Medway; providing resilience for nature through better connectivity and conditions; informing the design and sustainability of new development; and supporting healthier lifestyles.”*

Whilst we welcome this objective, there MUST be inclusion of ALL forms of active travel, including horse riding and carriage driving for the reasons stated under key information.

“Supporting people to lead healthy lives and strengthening our communities

To reduce inequalities in health and deliver better outcomes for residents, by promoting opportunities for increasing physical activity and mental wellbeing, through green infrastructure and public realm design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and to reduce social isolation by supporting retention and development of local services close to where people live, and inclusive environments that are accessible by all groups in society.

Whilst we welcome this objective, there MUST be inclusion of ALL forms of active travel, including horse riding and carriage driving for the reasons stated under key information.

5. Developing a Spatial Strategy

5.31 Development of large sites in this location could provide opportunities to enhance sustainable travel options, making it easier and more attractive for people to walk, cycle and use public transport. The concept of the ‘15 minute neighbourhood’, where communities can benefit from services on their doorstep, has relevance to growth plans in this area. New urban extensions could provide for local services and be designed to prioritise pedestrians rather than cars. Development at such a scale could also include new workspaces, closer to where people live.

Whilst we welcome this objective, ALL vulnerable road users MUST be included to enable all user groups safe access to sustainable travel and leisure options for the reasons stated under key information.

5.41 In the absence of the HIF funding programme, the opportunities and issues still remain key considerations in the preparation of the new Local Plan. Large scale development around Hoo St Werburgh and neighbouring villages could provide for planned growth, where new housing is supported by new and improved services and infrastructure. Such development could also help to meet the Council’s ambitions for

greener growth, with higher environmental standards in construction, communities better connected for walking and cycling, and within easy reach of local services.

For all the reasons cited during the course of planning for this project, all user groups should be included in any provision for safer roads and paths.

Employment sites

- *Hoo St Werburgh* - Any development here would impact on public bridleway RS108. Any increase in traffic or development of this area will impact on local equestrians who already have limited off road capacity. Consequently, we would ask that provision is made to ensure the comfort and safety of equestrians in this area as well as cyclists and walkers.
- *Isle of Grain* – As per the above for RS358
- *Rochester Airport* – As per the above for RR18

Rural Development

Lower Upnor/Chattenden/Hoo St werburgh, Allhallows etc.

- As per the above for RS105A, RS545A and RS87
- We would wish to see footpath RS105 upgraded to restricted byway status as a condition of any development here.
- Any provision for cycling to include equestrians
- Where development is taking place, the public footpaths should, by default, be upgraded to at least bridleway to enable safe use by equestrians and cyclists.

Summary

- The upgrading of existing footpaths to restricted byways or bridleways rather than walking/cycling routes should form part of planning permission granted on these sites.
- Developer contributions should be sought, not only for higher status PROW improvements, but also to provide local equestrian light controlled crossings (for the benefit of all NMU/VRUs) where required or where likely to be required in the future with further development thus improving and/or maintaining connectivity.
- Bridleways and restricted byways must not be used as access roads.
- Sport and recreation opportunities need to consider riding schools within the Authority area as well as equestrians in general.
- Unless there is evidence based reason to the contrary, provision for walkers and cyclists must include all vulnerable road users. Risk assessments must include assessing the impact of excluded parties being forced onto roads sandwiched between motorised vehicles to one side and potentially two way cycling on the other.

We would be very willing to work with the Council and would be developers in providing these improvements for EVERY vulnerable road user.

Yours faithfully

Sarah Rayfield (Mrs.)
Access Field Officer – London & South East

ⁱ DEFRA FoI Request April 2021

ⁱⁱ BETA – The National Equestrian Survey 2019

ⁱⁱⁱ <https://www.bhs.org.uk/media/ganngxh/health-benefits-of-riding-in-the-uk-full-report.pdf>

^{iv} NHS Digital National Statistics “External Cause”



30th October 2023

Dear Sirs

Re: Regulation Consultation – Setting the Direction for Medway 2040

I am writing to demand that the proposed sale of Chatham Docks for housing should not take Place. Chatham Docks should remain as a working dock in the new Local Plan. Having been born in Gillingham and lived and worked in Medway all my life, I hope the Local Plan will give the Docks the certainty it deserves going forward as an industrial and employment hub.

While new homes are needed in Medway the proposed development should not be built, as they will be unaffordable for local people and will encourage people from London to move into the area, who can afford them, but who will bring little to the local economy, as most will continue to commute to London to work. Chatham Docks generates more than £250,000,000 worth of business every year for Medway and employs 800 people directly with a further 1,400 jobs through supply chains. Average salaries are well in excess of average Medway salaries. Businesses at Medway docks include steel manufacturer ArcelorMittal, Kent Wire, specialist recycling firms such as Street Fuels and ship repairer Total Ship Repairs. The workforce at the Docks is mainly local.

Apart from the employment of local people and the money it generates for the local economy In this time of climate emergency, it should be noted Chatham Docks also delivers huge environmental benefits through the transportation of goods by water. There are currently 180 ship movements a year at the Docks that could be greatly increased. If Chatham Docks were to close that would be a massive 300% reduction in air quality. In addition, closure of the docks would remove the only commercial non-tidal basin berth in Kent. Relocating to Sheerness would not be an option given the cost involved.

Overall, Chatham Docks should be retained as a Docks going forward in the Local Plan. The Docks could be expanded to provide even more manufacturing if the developers stopped land-banking the parts of the Dock it controls for expensive commuter housing.

The history connected to the docks is immense, generations of my family have worked there and to lose that for the sake of profit for a multi national company that has no affinity with the area is obscene. Once the docks go it will never be replaced, except by soulless housing which will not be of benefit to those that have Medway at their heart.

I urge Medway Council to retain its existing planning protections in the new Local Plan for Medway which have protected the jobs of the thousands of people who rely on Chatham Docks.

Yours faithfully,



FOA. Catherine Smith,

On behalf of Cuxton Parish Council, we wish to raise our objection to land south of Bush Road included for development in the draft Local Plan.

It is land which is in the Green Belt area and forms part of the Kent Downs Area of Outstanding National Beauty [AONB].

The National Planning Policy Framework advises that construction in the Green Belt is inappropriate development.

In the Gravesend Local Plan which includes land between Dartford and Rochester, in a recent assessment, it was considered inappropriate for development as this land is within the West Kent Downs Landscape Character Area [LCA] and the Sub area of Luddesdown which is also in an area of [AONB].

This land [LCA] and an [AONB]forms part of Ranscombe Farm Reserve and on the South Point of this reserve is Brockles Field. The Viewpoint here is considered one of only five outstanding meadows in England. In a recent Inspectors report he mentions the bird song he heard which he felt supported the tranquility of the area which should remain undisturbed, and is also within the Green Belt and [ANOB].

The land to the South of Bush Road includes the North Downs Way and is of National Importance as it links the three long distance paths across England. Namely, The Pilgrims Way, The E- Route from Middleton in Teesdale to the Dover Route, [The St. Bernards Way]. All passing through the above mentioned [AONB], plus Ancient Woodlands and chalk escarpment.

The other site of concern is the land between the railway line from Strood to Maidstone West and the river. This river's edge is not suitable for housing as it is within a large flood plain and is only suitable for Marine use and will not support main drainage etc. Housing in this area would also have a great impact on the narrow Highway through Station Road and onto the main A228 and Bush Road junction , which is noted to be already at maximum capacity.

The railway line forms a flood barrier to the East. However, the land on the East side is permanently flooded which clearly indicates that housing of any sort would always be at risk of flooding, and has always been regarded as in a flood plane. Historically, this land was excavated for local cement digs and as a brick manufacturing company.

I trust you will consider the issues we have raised when considering your draft of the local plan. Thank you Ged Chalker. Chairman.

headley, andrew

From: Franklin Amadi [REDACTED]
Sent: 21 September 2023 08:39
To: futuremedway
Subject: local plan 2040

Dear whomsoever may be concerned

If making Medway a destination of choice truly is a priority of those who make the decisions I really would love to see Medway build into its local plan employment centres. Also, before I lived in Medway I didn't own a car. After a year living here I got fed up and learned to drive. Public transport here is really poor. A 10 minute car journey from Upnor castle to Chatham Dockside will take hours by public transport. I know the solution isn't to just subsidise loads of busses but something must be done to get us out of our cars for the shortest journeys.

Regards
Mr Amadi

Sent from [Mail](#) for Windows

headley, andrew

From: [REDACTED]
Sent: 31 October 2023 13:53
To: futuremedway
Subject: Local Plan

Follow Up Flag: Follow up
Flag Status: Flagged

I`m am getting worried with the amount of Properties that are being built. Rochester is going to loose its identity. The amount of flats and Appartments that have been built and its seems more are planned for. Its getting more like Thamesmead. It use to be nice to walk around Rochester but its loosing its charm.

There is a new housing estate at Cliffe woods, not for the local people when the price is £800,000 plus and first time buyers have got no chance. What is a big concern to most local people is there seems to be no infostructure. The Doctors surgeries in the area are struggling now with more housing people will have no chance of an appointment. It seems Medway council have no idea what local people want. We are loosing our lovely Kent villages to developers, Just look at Hoo. I know we need housing but there are a lots of brownfield sits being ignored

[REDACTED]

Medway Local Plan 2022-2040

Regulation 18 Consultation – Setting the Direction for Medway 2040

September 2023

2. Context

1. I support the plan taking account of Medway's complexity, identity, history and heritage, but also supporting innovation, enterprise and learning centres.
2. I support the emphasis on quality of life for Medway's residents.
3. I support the need to consider Medway's diverse communities.
4. I agree with the emphasis on environmental issues.
5. I agree with the emphasis on climate change. *In particular, I would like a strong emphasis on protecting the flood plains within Medway from future development through very specific policies.*
6. I agree with the focus on sustainable transport connections and better use of the river for transport.
7. I agree with the focus on improving the choice, mix and quality of new homes.
8. I agree with the focus on Medway's strategic advantages for businesses.
9. I support the upgrading of Medway's infrastructure.
10. I agree that key infrastructure such as transport links, schools and healthcare centres, needs to be in place ahead of new development.

3. Vision for Medway in 2040

I agree with the key points in this section, especially the need to protect Medway's countryside, coast and urban open spaces, particularly to preserve the rural character of the Medway Valley and preserve the landscapes and habitats of the Medway and Thames estuaries.

I agree with developing new uses for high streets and town centres in response to changes in retail, leisure and work patterns.

I agree that former derelict sites at Grain and Kingsnorth should continue to develop as thriving economic hubs.

I also agree that the plan should support the continuing use of Medway's farmland for the production of quality food, in line with the U.K.'s post Brexit strategy and need to be more self-reliant rather than importing food from abroad.

4. Strategic Objectives

I support the need for the plan to prepare for a sustainable and green future, including reducing the risk of flooding and seeking to protect the most vulnerable groups from the impacts of climate change.

I agree that the plan should strengthen and develop transport networks providing safe and effective choices for sustainable travel and management of the highways network, to improve air quality.

The plan needs to protect Medway's natural and historic environments and ensure the effective management of natural resources.

I also agree that the plan should support people to lead healthy lives and to strengthen our communities, taking account of the needs of people with disabilities, the elderly, young people and those from minority ethnic communities including gypsy travellers.

I agree with the need to preserve and enhance our green spaces to promote healthier lifestyles for Medway residents.

I agree that the plan should focus on securing jobs and developing skills for a competitive economy,

I agree with the need to boost pride in Medway through quality and resilient development. In particular I support the need to deliver sustainable development and to direct growth to the most suitable locations that can enhance Medway's environmental characteristics. This should involve promoting brownfield land and preserving land within the Green Belt (GB), Special Protection Area (SPA), Ramsar site, Site of Special Scientific Interest (SSSI) and Area of Outstanding Natural Beauty (AONB).

5. Developing a Spatial Strategy

1. I agree with the need to identify land to be allocated for new development and land to be protected, such as Green Belt, SSSI and AONB.
2. I would welcome a stronger emphasis on the need to identify land that is suitable for development, i.e. promoting the use of brownfield land, and a commitment to protect GB, SPA, SSSI, AONB and Ramsar site from any development. This aim will require clear policies and strategies to enable these sites to be protected from development.
7. I support the need to include the potential impact of the Lower Thames Crossing (LTC) on Medway's roads, including those near Medway's boundary such as the M2 Junction 1 and J3. In addition, I have concerns that the LTC will cause additional traffic through villages such as Cuxton, which already occurs when there are disruptions to the flow of traffic on either the M2 or M20, when Cuxton is used as a short-cut between the two motorways.
14. I do not want the Land Availability Assessment (LAA) to include any land for future development that is within GB, SPA, SSSI, AONB and Ramsar site. I strongly object to land in these designations being used for future development, including new housing or commercial uses.
15. I strongly urge that all proposed sites within the GB, SPA, SSSI, AONB and Ramsar are removed at the next stage of assessment and Sustainability Appraisal. I do not consider that any mitigation measures would be appropriate to enable land in these areas to be used for new development.
16. I strongly urge that the land within the Green Belt for the building of 2,824 houses be removed from the LAA, in line with Government policy that identifies that the fundamental aim of the GB is to prevent urban sprawl by keeping land permanently open.

Urban Regeneration

18. I am in favour of identifying underused sites that could make better use of brownfield land for new development.

20. I support the emphasis on providing different styles of building in keeping with their local environment, thereby retaining the distinctive and varied character of Medway.
22. I support the use of underused and vacant sites in central urban areas to meet the needs of younger and older people.
24. I agree that new housing needs to be connected to good public transport.
25. I also agree that potential sites for new development need to take account of climate change, environmental and heritage factors.
27. I strongly agree that urban regeneration and the building of new homes must be supported by services, including new schools and health facilities.

Suburban Expansion

32. I support strategies for ensuring that farmland is used for food production and oppose any development in the Kent Downs AONB, SPA, Ramsar site and SSSI, recognising its international and national importance for wildlife. These strategies will need to be very specific as I am very concerned that over recent years there has been a loss of high quality farmland in Medway that used to be used for food production.
34. Any new housing development needs to include the provision of services such as good public transport, health centres, schools and access to local employment.

Rural Development

36. I strongly object to any new development within the GB, SPA, SSSI, AONB and Ramsar or which might negatively impact these sites.
42. I strongly agree with the need for agriculture to continue to be an important land use for the Hoo Peninsula and the Local Plan should include specific strategies to support this and to protect the natural habitat of wildlife.
44. I agree that the natural environment should be protected, with particular emphasis on biodiversity, landscape and water management.
45. I agree that new development will need to be supported by improvement to roads and public transport.
46. New development will also need to be supported by additional services such as schools, shops and health and leisure facilities.

Green Belt Release

50. The National Planning Policy Framework (NPPF) advises that the construction of new buildings in the Green Belt is inappropriate development, with the exception of buildings for agriculture. I strongly oppose any Green Belt releases. I have particular concerns about new development within the AONB, as the NPPF requires that great weight is given to conserving and enhancing the landscape and scenic beauty of the AONB which is accorded the highest status of protection.
54. I consider these sites unsuitable for new development for the above reasons. In particular, the land proposed for development in Bush Valley, Cuxton should not be released for those reasons and also because building new homes on this site would conflict with the Government's policy that the fundamental aim of the

GB is to prevent urban sprawl by keeping land permanently open. I also have concerns about the negative effects of increased traffic on local roads, particularly the country lanes in the vicinity of this site.

In the Appeal Decision¹ relating to Vineyard Farms Ltd's proposal to build a winery in this area, the Inspector considered the 'effect of the appeal scheme on the landscape character and appearance of the area including the Kent Downs Area of Outstanding Natural Beauty'. He concluded that 'the net effect of the addition of the new road running close to an existing route, both finished as metalled roads would be to urbanise this area of the AONB.' (Appeal Decision para .30) Furthermore, he stated that 'The introduction of the proposed winery into a landscape recognised for its seclusion and intimacy would have a significant adverse impact on the site and its wider landscape. (Appeal Decision para 35). I believe that a development of new homes would have a greater adverse impact on this special site.

In the Appeal Decision the Inspector also refers to the major adverse impacts of development which would be experienced by users of the many footpaths in this part of Bush Valley, including the North Downs Way, which he considered to be 'a highly sensitive receptor being a National Trail with historic resonance.' (Appeal Decision para 45)

In the Appeal Decision, the Inspector refers to the Conservation Board's Management Plan which 'recognises that 'peace and quiet' is a quality of the AONB which is identified in the Board's public perception surveys.' Considering the impact of new development on tranquillity, the Inspector argues against introducing 'a range of additional activities which would erode tranquillity further and in so doing undermine the qualities of this part of the AONB.' (Appeal Decision para 58)

Employment Sites

I agree with the need to provide additional employment opportunities in Medway, but sites chosen should be suitable for this use, including their impact on transport networks.

6. Next Steps

6.4 I hope publication of the Draft Local Plan will be widely publicised. A good opportunity would be to include details of the consultation period and events in Council Tax notifications sent to Medway residents.

¹ The Planning Inspectorate Appeal Decision, Dated 24 July 2023,
Appeal Ref: APP/12280/W/22/3307648 Land south of Bush Road, near Cuxton, Medway, Kent

headley, andrew

From: Gary Miller [REDACTED]
Sent: 29 October 2023 19:41
To: futuremedway
Subject: Local plan

Follow Up Flag: Follow up
Flag Status: Flagged

It was incredibly hard to add a comment on the proposed local plan, in fact after going round in circles many times, i stumbled on this email address, the actual link takes you to a blank page, having very little trust that you are actually writing this plan for the residents of medway or more doing the bidding from above this comes across as you do not want to actually here from the little people it concerns.

Regarding travel you mention a meaningful drop in traffic, For one it won't happen, people love their cars and the freedom they give, it will be a big fight to make people give them up. When hydrogen cars come in, it will not matter how many cars are on the roads they are non polluting, electric cars will go the same way as betamax video did, they are not cutting it around the rest of the world, their day is numbered, car manufacturers won't just make them for Britain. Even so you will not get people out of there cars, Look at the last council meeting how many members rode there, I will guess at none but you want ordinary people, old people, ill people, families with little children to ride, to visit family, get to work, do the weekly shop, ride with bags of shopping on the handle bars, have you tried it ? not easy. Sit outside Costa in Rainham, have a coffee or two and see how many people ride by, you will only need one hand and that is in summer when it is fairly warm with light evenings. Winter, when it is dark, cold, wet or icy I would probably only need one finger. I suggest to forget the fluffy pink bunnies cycling and walking world and get back to reality and that is not to mention the Medway Towns are far from flat, from the river to the M2 it is 140m above sea level, quite a climb on a bikelet alone Chatham Hill, Castle Hill, Waterworks Hill, Frindsbury Hill to name but a few. Keep the cars moving i suggest especially in the Medway towns where lots of people drive out the area to work.

Regarding housing, you managed to fill in every gap in the Medway towns turning it into one metropolis. One of the few charms left of the area (you claim to love and care about) is the drive along Lower Rainham Road, in an urban area but with trees and fields on both sides for a decent stretch. In the last few years you have managed to build 100's, possibly over a thousand houses turning into one big permanent building site with non stop roadworks. With the design of some particularly down Otterham Quay Lane (I suggest you change the name to Road now, no longer a Lane) being quite awful to look at from the Road.

As for taking 2,000 from Gravesham an absolute no, you want to cram thousands of new homes in of our Government targets and ruin the area and have other councils too, NO, plus the 2,000 maidstone want to build at Lidsing, again whose Doctors, Roads, Schools, Shops and other already busy facilities will they use.

Keep the fields as fields, farmers need them to keep us fed, build on them, solar farms on them, wind turbines by them, leave them as rubbish dumps for the non recyclable solar panels and wind turbine blades, you won't be able to feed us all.

And what are the Minerals in Medway ?.

,

**RESPONSE TO
MEDWAY COUNCIL'S REGULATION 18 DRAFT LOCAL PLAN SEPTEMBER 2023**

ON BEHALF OF

PORT MEDWAY MARINA

BY

**PETER COURT
PETER COURT ASSOCIATES
CLEAVELAND
CHART ROAD
CHART SUTTON
KENT
ME17 3RB**

OCTOBER 2023

1.0 Introduction.

- 1.1 This response to the Regulation 18 draft Local Plan (September 2023) is submitted on behalf of Messrs David and Neil Taylor, the owners of Port Medway Marina (PMM). The Marina itself is situated on the west bank of the River Medway at Cuxton and has been owned and operated by the Taylor family since 1990. During that time extensive improvements have been made to what was a neglected and derelict boatyard. It is now one of the largest marinas and boatyards on the River Medway, offering 950m of fully-serviced pontoons and 1000m of quayside moorings, along with many other facilities and infrastructure for maintenance and brokerage. The details of the development of PMM are set out in the attached document: “Port Medway Marina: A Short History 2021.”
- 1.2 The owners are now looking to undertake further developments. They have, together with their consultants, engaged in extensive pre-application discussions with council officers and recently (on the 9th October 2023) made a presentation to Medway Councillors and senior staff. The details of their proposals are set out in the attached document “Presentation Printout October 2023” which formed the basis of the presentation to councillors. This document, moreover, provides the context for and is an integral part of the responses below to various issues set out in the Regulation 18 document and it is for this reason that it too is attached to this submission.
- 1.3 Whilst progressing those latest proposals, the owners engaged in the local plan procedures and made submissions to the Council’s earlier consultation documents. Although it is the owners’ intentions to submit a planning application for their latest development proposals, they consider it appropriate to continue to engage with the Council via the local plan process and therefore the latest submissions set out below need to be considered within that context.

2.0 Paragraph 2.6

- 2.1 The acknowledgment that the River Medway is a key asset is most welcome. Indeed, it is understood that the Council is producing a River Strategy - again, something that is most important and something with which the owners of PMM would wish to become involved due to their extensive and detailed knowledge of the river, its historic contribution to the local economy and its potential to be revitalised as a major asset for Medway. As stated above in the Introduction to these responses, the attached document Port Medway Marina: A Short History provides a detailed explanation of this experience and knowledge.
- 2.2 In this context it is appropriate to point out that just over one-third (34.5% to be precise) of the total UK's coastal berths are in the South East and £1.5% of all boats in the UK are moored at a marina with fully serviced pontoons. Nearly 100% of the berths in marinas in the South- East are fully booked with a waiting list for new customers. However, the River Medway is so underdeveloped that it only represents around 3% of the 34.5% capacity in the South- East. There is, therefore, a huge potential for marine development on this river, creating employment, leisure and tourist facilities and enormous economic benefits to the local area. Indeed, the Council acknowledges in paragraph 2.4 of this draft local plan that "there are many areas where we need to improve on the current position." The improvement of marina facilities on the River Medway is surely high up on that list.
- 2.3 Paragraph 2.6 also refers to the Council's aim of producing a strategy for reducing car dependency. The development proposals for PMM include the delivery of a footpath linking the Medway Valley Park with Cuxton, together with residential and business development adjacent to Cuxton railway station. The proposed paths are, in fact, the last link needed for the completion of the cycle route from Medway to Maidstone. These, together with the fact that PMM is served by bus services along the A228 will all help in reducing car dependency.

3.0 Paragraph 2.7

- 3.1 It is agreed that the supply of new housing is more than simply being about housing numbers. The proposed development at PMM includes 49 dwellings with a range of housing types and tenures -together with employment development - that will play a part in helping the Council meet this particular objective.

4.0 Paragraph 3.1

- 4.1 It is most important for the Council to confirm (as it does in the section entitled “Vision for Medway in 2040) that Medway is defined by its river and estuaries. Indeed, the whole paragraph which ends with the sentence “there are new opportunities for river transport” sets out a vision which is very much supported by the owners of PMM. The Marina itself is a key component and asset and the latest development proposals there seek to build on what has already been achieved by the owners. Reference has already been made to the plan for providing additional housing, employment opportunities and the delivery of a riverside footpath-which, as the draft plan states, will provide attractive and healthy connections and be a draw for visitors and residents. However, and in addition to these, the owners are investigating the opportunities for providing river transport from the Marina. That too will enhance the use of the river and add to its attractiveness.
- 4.2 The proposed development of further employment opportunities at PMM will play their part in helping to sustain Medway as a leading player in the region. It will add to the broad portfolio of employment sites and provide important opportunities for residents. In addition to this, it will make excellent use of brownfield land - something which the Council and the government wholeheartedly support in their planning policies.

5.0 Paragraph 4.2

- 5.1 The strategic objective of the Council to boost the performance of the local economy by supporting local businesses to grow and innovate is most important and welcome. The development proposals for PMM do just that. Indeed, they fully accord with the other bullet points listed in this section of the local plan, namely to build on existing strengths and expertise -such as engineering - and to attract and develop the jobs of the future and to support the growth of tourism.

6.0 Paragraphs 5.16 - 5.19

- 6.1 Urban regeneration and the use of brownfield land lies at the heart of government planning policy. It is therefore important for the Council to also acknowledge this in its draft local plan. Whilst it has estimated the potential residential capacity of urban regeneration sites it has failed to identify PMM in its Map 1 – overview of potential urban sites for Urban Regeneration. It is therefore requested that the land at PMM be identified in the next version of the draft local plan, as the regeneration of this site will provide some 49 dwellings and land for employment use. This therefore constitutes making the best use of vacant or under-utilised brownfield land, which lies at the very heart of national and local planning policy.

7.0 Paragraph 5.20

- 7.1 The proposal for further development at PMM comprises an important regeneration opportunity, which is something that the Council clearly recognises. Moreover, this paragraph acknowledges that regeneration sites offer a variety of opportunities for a mixture of modern or more sensitive designs, depending on their locations and settings. The proposed development at PMM, which itself comprises the regeneration of a brownfield site, has emerged from site visits and detailed meetings with the Council's planners and urban

designers. Indeed, the design and detailing of the proposals have been amended in order to accommodate the advice from those council officers.

8.0 Paragraph 5.24

- 8.1 The objective of the Council to continue its successful strategy of urban regeneration is commended and supported. Indeed, the Council is right to seek to direct new homes to locations where everyday needs can be met., especially where those locations are well-served by public transport. The proposed residential and employment -related development at PMM will not only be on a brownfield site but also on one which is close to Cuxton railway station and the bus routes along the A228. Moreover, it will help sustain existing services in the village of Cuxton. As can be seen from the plans in the attached documents, these include a primary school, post office, public house and eateries, along with a library. Further residential development, including affordable units, as well as employment space will therefore be supportive of those existing facilities and comprise the very essence of sustainable development.

9.0 Paragraph 5.36

- 9.1 It is appropriate for the Council to propose development on a range of sites - urban, suburban and rural. Unfortunately Map 3 - overview of potential sites for Rural Development appears to indicate development at or adjacent to Port Medway Marina, although the scale and clarity of that plan leaves much to be desired. It is therefore requested that PMM be identified for residential and employment development in the next draft of the local plan.

10.0 Conclusion

- 10.1 The owners of Port Medway Marina have, over the period from 1990, done much to regenerate a run down and derelict marina. It is now an important asset

and has the potential - as explained both here and in the documents submitted in support of the latest proposals - to provide much-needed residential development, land for employment uses and important leisure and other facilities for the local population such as the footpath link with the Medway Valley Riverside Park. Indeed, the residential element of the proposals will constitute a driver for the development of the Marina as a modern facility for the benefit for the whole of Medway. It is therefore requested that the Council takes full account of this and identifies Port Medway Marina in future drafts of the emerging local plan.

Port Medway Marina

Station Road

Cuxton

Rochester

Kent

ME2 1AB

A short history June 2021



Port Medway Marina

Port Medway Marina is situated in the South East corner of England near Rochester in Kent on the River Medway, with 60 miles of navigable river and easy access by water to the River Thames, East Coast rivers and the continent, including the French, Belgium and Dutch inland waterways.

The road access is excellent being 2 minutes from the M2 motorway and only 15 minutes from England's arterial hub the M25. London Gatwick airport is only 40 miles away, London Heathrow is 65 miles, London City Airport is 34 miles and Stansted Airport is 65 miles away.

By rail, Cuxton Station is adjacent to our main entrance and provides easy access to London and the South Coast. Ebbsfleet Station with its fast service to the Continent is 10 minutes away by road and Strood Station is 5 minutes direct link from Cuxton Station offering 30-minute fast service to London St Pancras Station.

Brief history

My name is David Taylor and in March 1990 I was very fortunate to find and purchase Auto Marine Boatyard, a neglected and derelict boatyard which extended to about 15 acres. Although the site had been an established working boatyard since 1935, the previous owners had allowed the premises to fall into total disrepair resulting in a graveyard of nearly seventy broken and wrecked boats. These ranged from ten-foot day boats and cruisers to a one-hundred-and-twenty-foot mine sweeper and included five Thames barges, three lighters, an MTB and a fifty-two-seater coach.

The pontoons and catwalks were unsightly and dangerous being held together with string and electrical wire and the site was generally overgrown making progress even on foot almost impossible except by the fit and adventurous.

By the end of 1990 a large proportion of the wrecks had been cleared and planning permission obtained to replace the existing pontoons with new and infill an area of land along the foreshore with inert material enabling further derelict boats to be removed and the resulting area used for car parking and boat storage.

Over the next four years the emphasis was on building the infrastructure and landscaping for major expansion and this was the springboard, not only for increasing the capacity of the Marina to 300 boats, but introducing a major facility on the River Medway. I had already provided 250 metres of fully serviced floating pontoons and associated facilities including lift out and dry storage with hard standing, quayside moorings, engine and boat repairs, slipway, cruising club, insurance, finance, chandlery and brokerage service.

Early 1995 saw the opening of the Rochester Queen a floating bar and restaurant on three decks. The prime function of the main deck was that of a restaurant with a capacity of 74 covers and 100 covers for a buffet. The top deck was designed as a Free house and although it was principally used for members of the restaurant and the Marina it was open to the public who would prefer a quiet drink in exclusive surroundings. The lower deck was totally rebuilt replacing the existing night club with a bar and function room. Not only was the ship used for private parties, but made an excellent venue for Weddings, promotional and corporate entertainment.

April 2000 was the start of the next phase of infill to provide additional hard standing and boat compound together with provision of another 350 metres of fully floating pontoons and 330 metres of half tide pontoons.

In 2001 I purchased another 12 acres of land to extend the Marina site to just over 27 acres.

Neil, my son, joined the Company in 2003 as Financial Director and with the overall success of the business we took the opportunity to expand our boat sales and travelled to the continent to purchase barges and boats which we sailed back to the UK, serviced / refurbished and sold on to new customers.

Port Medway Marina now provides over 950 metres of fully serviced pontoons, 1000 metres of quayside moorings, over seven acres of boat storage and can lift vessels up to 80 tons. Our two dry-docks can cater for vessels up to 50 metres with workshops to provide all the associated service and maintenance requirements.

We have carried out all of our own planning, obtained all the necessary consents, raised finance, constructed and built the Marina and finally operated, developed and produced a very successful business. Most of the profits have been re-invested into the business to generate expansion and growth and maintain a steady increase in capacity.

Over the last three decades we have survived Bank failures, recessions, Brexit and now the Covid Pandemic but we have maintained a stable foundation for growth and are now poised to tackle the ever-increasing demand for leisure.

The latest planning application to provide 49 luxury apartments, if successful will provide the necessary capital to finally enhance the Marina to a first-class level generating additional employment for the area and increase public access to the River. The development will complement the Medway Valley Park Complex introducing new customers, particularly from the River and again lead to further employment.

This will also provide the long-awaited public footpath from Cuxton to Medway Valley Park Complex.

Auto-Marine Boatyard in 1990



Look how far we've come!



www.portmedwaymarina.co.uk



01634 720033



PIC•COLLAGE

Port Medway Marina 2021









2016 ESTIMATED	NO. OF COASTAL/TIDAL MARINAS	NO. OF COASTAL/TIDAL BERTHS	COASTAL/TIDAL BERTHS % OF UK
South East	94	20,716	34.5%
South West	56	10,337	17.2%
London	16	1,303	2.2%
East of England	29	6,566	10.9%
East Midlands	2	277	0.5%
Yorkshire	2	559	0.9%
North East	8	1,646	2.7%
North West	7	1,661	2.8%
Scotland	42	5,960	9.9%
Wales	20	5,633	9.4%
Channel Islands/Isle of Man	9	3,857	6.4%
Northern Ireland	12	1,525	2.5%
Total Coastal/Tidal	297	60,039	100%

From the British Marine Federations assessment above 34.5% of the total UK's coastal berths are in the South East and 31.5% of all boats in the UK are moored at a marina with fully serviced pontoons. Nealy 100% of the berths in Marinas in the South East are fully booked with a waiting list for new customers.

The economic benefit of the leisure boating industry plays an important role in the UK economy with tourism activity in the UK worth around £2.5 billion a year generating up to 70,000 jobs.

The River Medway is so underdeveloped that it only represents around 3% of the 34.5% capacity in the South East and therefore there is a huge potential for marine development on this river creating employment and enormous economic benefits to the local area.

In addition to the economic benefits as a direct result of moorings and associated services, local non-boating services such as supply chains, supermarkets, restaurants, hotels and pubs will all prosper from this additional investment in the marina.

If successful with this Planning Application Port Medway Marina forecasts, over the next five years expansion will create an additional 150 jobs directly from marine activities with another 80 jobs created for non-boating services. Another 60 jobs will be created at the construction stage with permanent employment being established in stages as the development progresses.

Development Update October 2023

Since the original issue of this document in June 2021 development on the Marina has taken place at a rapid pace with considerable groundworks completed, new quayside moorings and general expansion of business for all of our equipment. We have a large number of steel barges up to 27 metres on the hard standing for essential repairs, large leisure boats and a number of commercial craft all in the process of repair and restoration. This is all new business brought into the area which has the knock-on effect of creating more business and job opportunities for local businesses.

We now have full access from the North/Eastern part of the site through the Medway Valley Leisure Park and the proposed public footpath has now been completed from the end of the existing footpath to the Medway Valley Leisure Park thus providing the potential to connect Cuxton Village with Medway Valley Leisure Park. This includes Network Rail's provision of a secure fence along the whole length of this section of footpath. This has taken over 25 years to achieve.

We are in the process of developing the lagoon area to provide additional moorings on the lagoons and fully landscaping the whole area, around eight acres, for possible public access. This will include access to the river to provide a starting point for a river bus connecting Cuxton, Borstal, Rochester, Strood, Chatham and Upnor by an efficient service by river which will assist with relieving the road system particularly with the ever-increasing demand from development and expansion in the local area. Our plans will also include a terminus for buses and coaches preferably electric.

Approval of our proposals to develop these new Apartments will see the profits ploughed back into the business to achieve the ambitious plans described above and create a first-class facility available to not only the local community but a wider range of visitors with the emphasis on river access. This development will create essential housing, additional employment, and give good access to the river which is seriously lacking at the moment.

We are also in serious discussions with several housing associations to provide much needed social housing as part of the development. We have also included Marina offices and essential retail to cater for the local community.

Our existing residential houseboat community who have lived on the Marina for the last 40+ years are fully integrated into the local community and fully contribute to local life. They have witnessed the immense change over the last 33 years and are excited with the potential development which will finalise a long-term project achieved through hard work, persistence, and emotion.



Land at

**Port Medway Marina
Station Road
Cuxton
ME2 1AB**

**Presentation Printout
October 2023**

CLAGUE ARCHITECTS

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Reference : 23857A | 901 | Rev D | Reports and Minutes | Presentation Document

Prepared by : Lydia Duursma and David Johnson

Checked by : Christopher Sherlock-Scougall

Issued : 28/09/2023

CLAGUE ARCHITECTS

62 Burgate, Canterbury
Kent, CT1 2BH

t: 01227 762 060
f: 01227 762 149
e: info@clague.co.uk
w: Clague.co.uk



2 Keswick Dr, Maidstone
Kent, ME16 0DQ

t: 01622 437 196
e: admin@hwandco.co.uk
w: hwandco.co.uk/

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INTRODUCTION

DOCUMENT PURPOSE

This document has been produced to inform a pre-app discussion with Medway Council for a scheme 49 high quality, bespoke, riverside apartments, chandlery and improved marina facilities. The document illustrates the design process, evolution of ideas and proposals that are now being put forward by the site owners for the land at Port Medway Marina.

ABOUT PORT MEDWAY MARINA LTD.

Port Medway Marina is an important marina on the River Medway both for the services it provides and its river based employment. It provides over 950 metres of fully serviced pontoons, 1000 metres of quayside moorings, over seven acres of boat storage and can lift vessels up to 80 tons. The two dry-docks can cater for vessels up to 50 metres with workshops to provide all the associated service and maintenance requirements.

Further details are provided in the accompanying brochure and details are on the website www.portmedwaymarina.co.uk.

ABOUT CLAGUE ARCHITECTS

Clague is an award winning practice of architects, masterplanners, urban designers, interior designers and historic building consultants working from design-led studios in London, Canterbury and Harpenden.

The firm celebrated 84 years of practice in 2018, and has a reputation for excellence in architecture and masterplanning. Our extensive experience, gained from designing an extremely wide variety of projects of differing type, scale and complexity throughout the UK, has allowed us to develop invaluable knowledge that feeds into all aspects of our work.

WE CREATE PLACES

Our approach to masterplanning and detailed design is deeply informed by regional variation, observation, opportunities and context.

Clague conceive masterplans with easily understood themes which can filter through all the aspects & documentation of the masterplan. Combining this with excellent graphic skills leads to our masterplans being more legible and easily understood at every level, not least of all by the local community.

ABOUT HILL-WOOD & Co

We are a passionate team who offer their clients and all projects proactive foresight across landscape, ecological and arboricultural elements - ensuring areas of conflict are identified early on, offering Landscape Design Solutions including Masterplanning, Landscape Architecture and Landscape Design across England.

Hill-Wood & Co is an expanding practice in the County Town of Kent, with 15 years of experience in landscape architecture, construction, development, planning and inclusion of ecological and arboricultural practice.

We work for a number of SME's, architects, planners, Councils and national house builders. Offering the service of a dedicated team to create positive developments which provide a landscape for now and for the future.

Working in unison across these services creates mutual benefit and gain. The outcome is a result where project schedules are met and budgets are closely adhered to. HW&Co's approach to all projects is to ensure the clients brief is met, net biodiversity gain is achieved and the Governments White Bill is fulfilled.

'ALL OF OUR WORK DEMONSTRATES FLAIR AND IMAGINATION, YET IS SENSITIVE TO THE BUILT AND NATURAL ENVIRONMENT.'



Precedent Clague projects

'WE WORK WITH THE INTENT OF A COLLABORATIVE APPROACH TO OUR PROCESS TO TACKLE EXISTING REQUIREMENTS AND THE FUTURE NEEDS. THROUGH THIS WE CAN SHAPE THE PUBLIC REALM TO CREATE LIVELY ENVIRONMENTS THAT CONTRIBUTE TO PEOPLE'S HEALTH, HAPPINESS AND WELLBEING'



Precedent Hill-Wood & Co projects

The background image is a faded, sepia-toned photograph of a harbor. In the foreground, a concrete pier extends from the bottom left towards the center. Several wooden pilings are driven into the water. To the left, the bow of a large, dark-colored boat is visible. In the middle ground, several smaller boats are moored along a pier. The water is calm, reflecting the sky. In the background, a range of hills or mountains is visible under a pale sky. The overall atmosphere is quiet and somewhat somber due to the faded colors.

UNDERSTANDING CONTEXT

UNDERSTANDING CONTEXT

SITE LOCATION

The site at Port Medway Marina is located along the north bank of the River Medway, approximately 2.1 miles west of Rochester and 0.2 miles from Cuxton.

The land covers an area of approximately 8.9 Ha/22.1 Acres.

EXISTING SITE CONDITION

The site is currently home to the Port Medway Marina, one of the largest marinas and boatyards on the River Medway, offering 950m of fully serviced pontoons and 1000m of quayside moorings along with many other facilities and infrastructure for maintenance and brokerage.

A majority of the site, excluding the north eastern portion, is characterised by hardstanding and gravel that mainly accommodates boat storage and parking.

The site is flanked to the north west by the Medway Valley train line and to the north east by the Medway bridges and HS1.

The central part of the site is above the 6.01m AOD 100 year flood level. The development site is below this level and will be raised above the 6.01m level with the compensating flood water storage volume provided in an area of the site currently above the 6.01m level. A Flood Risk report by Herrington Consulting accompanies this pre-application.

PROPOSALS

The proposal for the development of the Port Medway Marina takes into account the existing features which characterize the area and the strategic gap that separates Cuxton and Strood, and proposes to deliver a scheme for 49 high quality apartments and improved marina facilities.



UNDERSTANDING CONTEXT

SITE PHOTOS



UNDERSTANDING CONTEXT

SITE CONTEXT AND CONNECTIVITY

The site is well connected by a comprehensive network of road and rail and is within a comfortable walking distance from Cuxton, the Medway Valley Leisure Park and various green spaces.


Cuxton train station sits adjacent to the site and offers good links to London St Pancras (44 minutes), Maidstone West (19minutes) and Strood (4 minutes).

The nearest bus stop sits approximately 0.1 miles from site on the A228 and offers routes to Chatham, Maidstone and Kings hill.


Prominent green spaces include Ranscombe farm nature reserve, a working farm and nature reserve that cover 560 acres of ancient woodland, arable land and chalk grassland.

The site is well located and within reach of the five Medway towns and their wide range of amenities. Cuxton itself has a library, primary school , post office and a small selection of restaurants and pubs, all within a 10 minute walk from site. Towards the north east are the Medway Valley leisure park that offers retail, dining and a 9 screen cinema; and Diggerland amusement park, both within a 15 minute walk from the site.


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
Train Station




M2




A2




A228



A229



Flood Zone 3



Main bus stops

400M


800M

1200M


Approx. 5 mins walk

Approx. 10 mins walk


Approx. 15 mins walk




Diggerland




Library




Rochester Airport




Industrial Estate




School




Church




Accommodation




Post Office




Pub/Restaurant/Cafe




Shops/Retail




Cemetery



Golf Course



Cricket Club



Flood Zone 3 (path of the River Medway)

8

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INITIAL PROPOSALS

INITIAL PROPOSALS

DESIGN EVOLUTION | SITE LAYOUT PLAN

An earlier iteration of the proposed masterplan explored more traditional roots when designing the layout for the site.

49 apartments front onto the River Medway, with ample pedestrian paths and squares hugging the riverside and key points of arrival, and include space for local retail that provides goods and services for the Port Medway Marina.

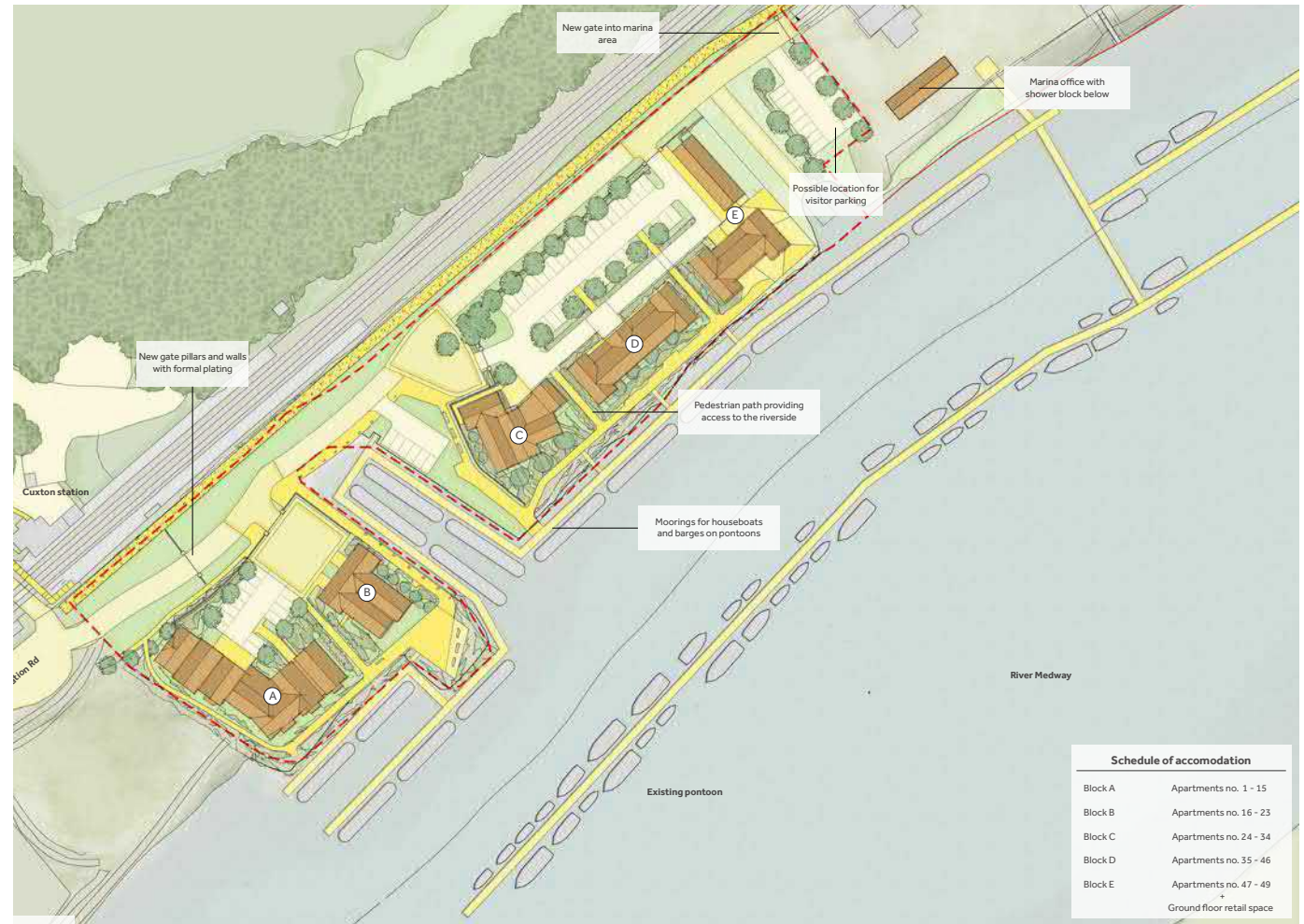
Both resident and visitor parking are tucked behind the apartments to allow uninterrupted views towards the River Medway and beyond, and include trees placed at regular intervals to break up the mass of paving and provide shade.

Several changes and amendments have been made to the proposal to improve the delivery of the project brief.

The traditional design of the apartment buildings have been changed in favour of more fluid contemporary bespoke designs that emphasize the southern views out towards the River.

The parking areas that service the development have been modified into a more efficient layout. The spine road for the development has been straightened out and roundabouts have been introduced along the intersections as traffic calming measures.

Trees and vegetation have been increased throughout the proposal to accentuate and improve the appearance along the spine road and parking lots and to break up the mass of hardstanding surfaces.



Early development sketch scheme for the site

INITIAL PROPOSALS

DESIGN EVOLUTION | GROUND FLOOR PLAN



Early development sketch scheme for the site

INITIAL PROPOSALS

STREET ELEVATIONS



Proposed Elevation from the River Medway - Option 1

INITIAL PROPOSALS

STREET ELEVATIONS



Proposed Elevation from the River Medway - Option 2 (A)



Proposed Elevation from the River Medway - Option 2 (B)

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An aerial view of a landscape proposal. The scene shows a mix of green spaces with various tree types, several light-colored rectangular buildings, and a network of paths or roads. A prominent road or canal runs diagonally from the bottom left towards the top right. The overall style is a soft, illustrative rendering. The text 'LANDSCAPE PROPOSAL' is centered in the middle of the image in a blue, sans-serif font.

LANDSCAPE PROPOSAL

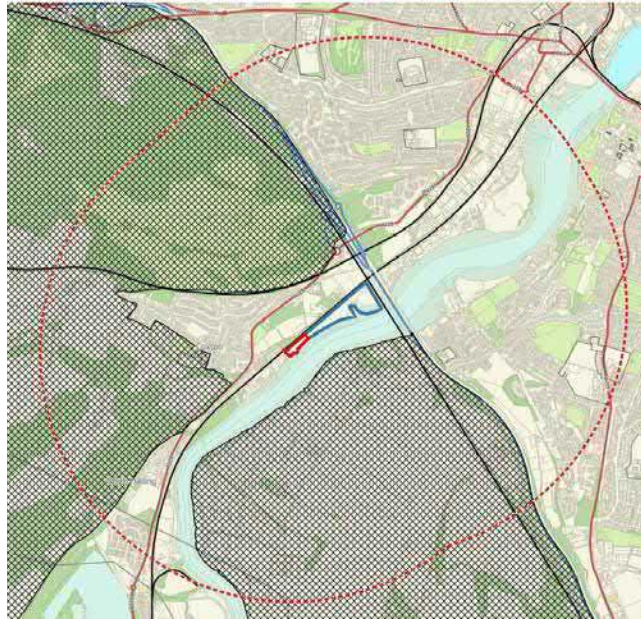
LANDSCAPE PROPOSAL | ASSESSMENT



Site Location and Wider Topographical Setting

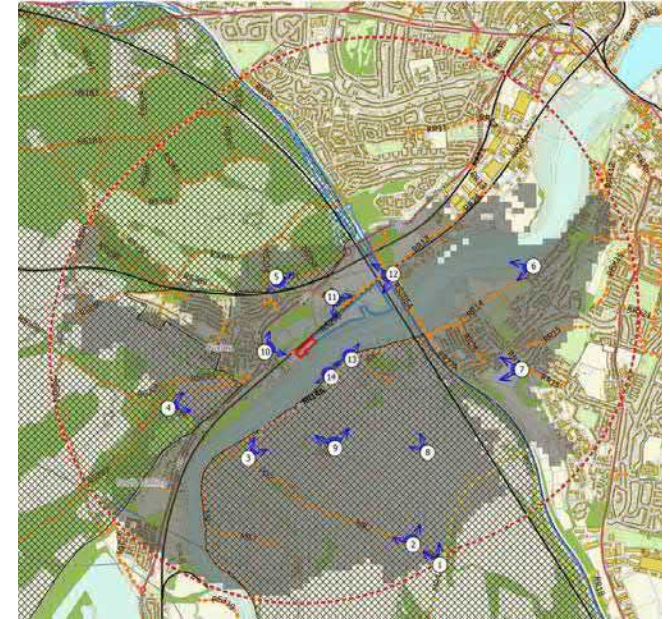
The landscape assessment reviews the site within its wider setting. This includes :

- Topography,
- Woodland,
- Geology,
- Ancient Woodland,
- Areas of Outstanding Natural Beauty,
- National, County and Local Character Areas



Site Location and Area of Outstanding Natural Beauty Setting

This subject site has a unique setting, on the edge of the River Medway, with open views to the south of the rising land on the AONB, with Cuxton to the north of the subject site, and the AONB beyond the built form.



Site Location and Location of Views for LVIA

The location of viewpoints are selected using all of the information from the Desk Study. This includes the Public Rights of Way, Woodland, Topography, AONB, Landscape Character Areas and the Zone of Theoretical Visibility (ZTV).

All of these viewpoints were visited. View 8, View 13 and View 15 have been assessed further to create Verified Views.

LANDSCAPE PROPOSAL

VIEW 8 VERIFIED VIEW

View 8 As Existing
Taken from Burham Road on the rising
landscape of the AONB to the south side of
the subject site

Clear views of the built form rising up the
valley side northwards towards the AONB.



View 8 As Proposed
Taken from Burham Road on the rising
landscape of the AONB to the south side of
the subject site

The proposals will sit below the existing built
form of Cuxton, with a clear separation from
the small copse of woodland and railway
vegetation north of the subject site. This will
be further reinforced with a minimum of three
rows of native trees on the subject site side.



LANDSCAPE PROPOSAL

VIEW 13 VERIFIED VIEW

View 13 As Existing
Taken opposite the site from the southern side
of the River Medway

Built form of Cuxton is clearly visible above
the boats using the moorings on the subject
site. The rising landscape of the fields
bordered by woodland, characteristic of the
AONB is more visible on the right hand side of
the photograph.



View 13 As Proposed
Taken opposite the site from the southern side
of the River Medway

The proposals are visible between the boats
mooring and the existing built form of Cuxton.
The number of storeys of the proposed blocks
retains clear views of the rising northern side
of the valley with the characteristic landscape
of the AONB above.



LANDSCAPE PROPOSAL

VIEW 15 VERIFIED VIEW

View 15 As Existing
Taken from Sundridge Hill

Looking south towards the River Medway from Sundridge Hill, the subject site as existing is not visible above the mature vegetation on the northern side of the railway line.



View 15 As Proposed
Taken from Sundridge Hill

The proposals are largely obscured by the existing vegetation on the northern side of the railway. A similar mix of native trees and shrubs are proposed along the northern boundary of the subject site, to reinforce the existing landscape buffer, and to provide the next 50 years of tree cover.



LANDSCAPE PROPOSAL



Cuxton

Sundridge Hill

Footpath / Cycle Link To River Medway Park

M2

CTRL / HS1

Railway Line

Station Road

Cuxton Industrial Estate

Cuxton Marina

PRELIMINARY

Port Medway Marina

Wider Landscape Setting

1:15000@A0

1:20000@A2 Sep 2023

0382/23/A/22

LANDSCAPE PROPOSAL | LANDSCAPE STRATEGY CONNECTIVITY



LANDSCAPE PROPOSAL | SOCIAL AND ECOLOGICAL OPPORTUNITIES



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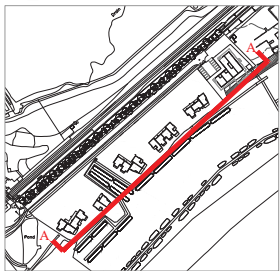


CURRENT PROPOSALS

CURRENT PROPOSALS | SITE LAYOUT PLAN



CURRENT PROPOSALS | MEDWAY RIVER ELEVATION



Proposed Residential Development

CURRENT PROPOSALS | HOUSE TYPES

The Design Team have also considered how the site relates to the River Medway and how it may be viewed from the opposite bank.

Working with Hill-Wood & Co. the Design Team have considered the visual impact of the proposed buildings including their built form, height and volume to ensure that their impact on the setting of the AONB is minimised. The proposals would sit below the visual line of Cuxton which due to the topography sits higher on the hill with existing trees and hedgerows providing visual layering and separation between the new proposals and the existing settlement. The form of the building is also carefully considered, being broken down into individual forms with gaps between the buildings to ensure that a 'wall' of development is not presented to the view from the River Medway.

The Landscape Visual Impact Assessment by Hill-Wood & Co further illustrates the points made above.



CURRENT PROPOSALS | HOUSE TYPES



Marina Offices

Materials have been selected based on the Kent Downs AONB Guidance On The Use of Colour document. These have been chosen from the palette identified as being appropriate for the Medway Valley. This material/colour selection, along with the carefully considered massing, height and scale of the buildings ensures that the proposals sit comfortably within the setting of the River Medway..

CONCLUSION

The proposals would deliver many benefits to the area and would be sensitively designed in their form, height and mass to ensure that they do not negatively affect the setting of the AONB (although the site itself is not in AONB). The benefits would be as follows:

- Bespoke, high quality designed apartment blocks that respect the riverside setting.
- Improving the facilities for the marina with new buildings that will house services, the chandlery and food store.
- Creation of a new cycle/footpath link from Cuxton train station to Medway Valley Leisure Park.
- Premium open plan apartments well in excess of minimum space standards and designed to take advantage of south facing light.
- Development will financially support Port Medway Marina allowing for new investment including new facilities such as an office, showers, toilets and other facilities for boaters, new pontoons and quayside tie up areas.
- Sustainably located as the site already benefits from good public transport connections with the nearby train station and bus stops.
- Parking provisions in line with Medway Council parking standards (September 2004, 2nd edition).
- Provides a different type of accommodation than standard house builder houses within the Medway area providing more variety.
- Provide additional housing in Medway to help meet the Council's current requirement for supply of land for housing and delivery of residential units within the area.



Medway Local Plan 2020- 2040
(Regulation 18) Consultation 2023
Response from CPRE Kent

Introduction

We are CPRE, the countryside charity. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England, with over 40,000 members and supporters living in our cities, towns, villages and the countryside. CPRE Kent is the largest of the CPRE County branches.

Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside.

We believe that the planning system is a toolbox for achieving better – for people, nature and the economy – while supporting the delivery of more badly-needed homes to end the housing crisis.

In general, CPRE Kent supports a development strategy which meets the following criteria:

1. Brownfield first, especially in urban areas and not in rural areas where it would result in unsustainable patterns of development
2. Development should result in sustainable communities
3. Provision in rural areas where there is an identified local need and the scale of development is appropriate for the size of the settlement
4. The plan should promote development in locations:
 - a. That are well supported by, or that will support, sustainable transport and active travel.
 - b. That are well served by regular public transport services and social and community facilities, that are in safe walking and cycling distance or would support, or result in, a sustainable settlement.
5. Ensuring our unique English countryside landscapes are protected and valued for the benefit of current and future generations.

Overall, it is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

Our detailed comments on the Consultation Document are as follows:

1. Vision for Medway in 2040

CPRE Kent consider that overall, the vision appears to be a comprehensive and ambitious vision with positive goals. However, it will be vital that the final vision is far more specific than the text provided within the consultation document. That is, whilst the text discusses Medway's vision broadly, it lacks specific details and actionable plans. It's essential to have measurable goals and specific strategies to achieve them. For example, it mentions transitioning to a low-carbon economy and achieving 'net zero,' but it doesn't provide a clear roadmap for how this will be achieved.

Overall, whilst the text presents a positive vision for Medway's future, it could benefit from more concrete and detailed plans to achieve the stated goals. Providing specific strategies, measurable targets, and a clear roadmap will enhance the credibility and effectiveness of this vision.

2. Strategic objectives

Again, it is CPRE Kent's overall view that the strategic objectives are largely positive with a rightly strong emphasis on the need to conserve and enhance the natural, built, and historic environment, which aligns with CPRE Kent's goal of protecting the countryside. However, it is important that these objectives are not just lip service but translate into firm actions and policies that prioritise the environment over development.

For example, whilst the Plan talks about improving transport networks, it should also consider the impact of transportation infrastructure on rural areas. Building more roads will lead to increased car dependant development and urban sprawl in rural regions, which can negatively affect the countryside. This is a particular concern that we have had with respect to the Hoo Peninsula, as made clear within our responses to the various HIF related consultations we have previously participated in. Likewise, whilst we support the aspiration for high-quality houses that genuinely meets the housing needs of Medway, it is our view that there needs to be far greater emphasis within the strategic objectives of redeveloping brownfield sites over greenfield sites.

More specifically, we welcome the placement of delivering the Council's commitment to the Climate Emergency at the top of the proposed strategic objectives, though would encourage that this be expanded to also meeting the ecological emergency. As above, it's essential to have measurable goals and specific strategies to achieve them made clear from the outset of the plan.

In this regard, it is CPRE Kent's view that the countryside itself can provide many of the solutions to tackling climate breakdown and ecological emergency, while supporting rural communities and economies to thrive. We need development to meet local needs, while contributing to efforts to mitigate and adapt to the climate emergency. Sustainable development needs to be redefined to focus on living within environmental limits and the importance of addressing the climate emergency. At the national level, CPRE is campaigning for all new development to demonstrate a net negative carbon footprint, and for all plans and infrastructure programmes to demonstrate how they will achieve a reduction in total road transport, not just the need to travel, and that climate action is a key test of soundness in the examination of all development plans.

We therefore consider that the new local plan will need to give 'positive discrimination' towards the environment by giving clear priority to policies which seek to mitigate climate change. For Medway, fundamental to this will be ensuring that the overall strategy for the new local plan is firmly focused upon optimising the recycling of land that has already been used for buildings by adopting a truly 'brownfield first' strategy. This will need to be put firmly at the forefront of thinking as the plan develops so that it is clearly reflected within each objective of the plan.

Alongside this, we would expect to see ring-fencing of all environmental measures within the local plan viability appraisal as being non-negotiable fixed costs. This should include the need for all new-build residential development to be designed to achieve zero carbon homes, with a requirement for detailed carbon assessments demonstrating how the design and layout of the development has sought to maximise reductions in carbon emissions, a water efficiency standard of less than 100 litres and ensuring significant improvements in the dwelling emission rate over the target carbon dioxide emission rates. We would also expect to see proactive policies which increase the area of habitats that sequester and store carbon and those which support projects

for retrofitting the existing building stock. Again, this will need to be clearly reflected within the objectives of the plan.

Overall, the proposed objectives show a commitment to environmental sustainability, but it's essential to ensure that these objectives are effectively translated into precisely worded policies and actions that prioritise the protection of the countryside and its unique ecosystems. Furthermore, robust monitoring and enforcement mechanisms should be put in place to ensure that development does not come at the cost of rural landscapes.

3. Developing a Spatial Strategy

As a first and overarching point, we are concerned as to the emphasis already being placed within the consultation document on the extent to which sites submitted by developers (as part of the Land Availability Assessment) will dictate the overall spatial strategy. It is CPRE Kent's experience that this is a flawed approach to plan making as, consciously or sub consciously, it places too much undue influence in the hands of developers who will naturally prioritise their financial interests over the genuine needs of communities. In this respect, such an approach inevitably leads to predominantly greenfield only spatial strategy, as it is greenfield sites that are almost unilaterally promoted by developers, as it is greenfield sites upon which the greatest profits can be made.

Such undue reliance upon developer submitted sites inevitably leads to a haphazard spatial strategy that lacks a cohesive, long-term vision. This in turn neglects important aspects such as sustainable infrastructure, environmental considerations, and the social well-being of residents. A far more effective approach is one in the Council takes firm ownership of the direction of the spatial strategy from the start, which then proactively identifies potential development sites to deliver that strategy. As set out below, this may include targeted call for sites, though will certainly be grounded in comprehensive, evidence-based planning that prioritises the environment (and identifies the positive qualities and placemaking benefits of 'constraints' to the environment) and the well-being of both current and future Medway residents, rather than short-term developer interests. It is our strong view that such an approach would naturally lead to a true "brownfield-first" spatial strategy.

More specifically, we have read and considered the 2021 Local Housing Needs assessment and welcome that it at least considered alternatives to the "Standard Method". For Medway, a strategy predicated upon rushing to try and meet the arbitrary housing target as set by the standard method would be an unmitigated disaster and doomed to failure from the start. As set out within the document, Medway has been averaging a net completion of only 730 dwellings a year. To suddenly expect that this will increase to 1,667 dwellings a year overnight is frankly bonkers.

However, and as recognised by both the consultation document and the housing needs assessment, the Medway Local Plan timetable is to coincide with a period of change with respect to how Local Plans are developed. That is, it has been confirmed that the long-awaited revised version of the NPPF which makes it clear the Standard Method is to be an advisory starting point only is to be published this Autumn now what was the Levelling Up and Regeneration Bill has gained Royal Assent. The Levelling Up and Regeneration Act itself will now usher in a new streamlined Local Plan making process underpinned by an as yet unknown, new Standard Method for calculating housing supply, though one which will be based upon the more up to date 2021 census data. Even without these changes, it is the case the Housing Needs Assessment would need to be updated, which as a minimum would need to be based upon the most up-to population projections and 2021 census releases.

Against this background of current uncertainty, it is CPRE Kent's view that Medway should be doing everything it can to ensure its baseline evidence is as up-to-date and robust as possible. This is because the clear direction of travel is towards a Local Plan system which is able to genuinely take into account both the opportunities and constraints of a district in terms of setting housing targets. For Medway, we see significant opportunities with

respect to a local plan which spearheads the regeneration and improvement of its urban areas. Likewise, we see significant constraints with respect to the amazing environmental and ecological features that the district is blessed with, particularly upon the Hoo Peninsula.

Therefore, and for the reasons set out above and below, Medway Council need to take ownership of setting a spatial strategy which is truly deliverable and sustainable having regard to the opportunities and constraints of the district. It certainly must not allow the direction of its spatial strategy to be unduly influenced at this early stage by the simple availability of unsustainable greenfield sites being promoted for profit. Likewise, it should not allow trying to meet some clearly unachievable arbitrary housing targets panic the Council into pursuing an unsustainable spatial strategy, particularly at a time when these targets are to be changed anyway.

In any event, we would firmly believe such an alternative approach is entirely warranted given the District's unique circumstances and would be found sound under both the current and the soon to be revised NPPF paragraph 35 soundness test. We would point to the Worthing Local Plan Inspectors Report¹ where, in agreeing that the specific constraints of the Borough meant a housing figure 74% lower than Standard Method figure was appropriate, the Inspector Steven John Lee BA(Hons) MA MRTPI stated:

"A local plan must also strive to meet the NPPF's objectives in relation to the quality of the built environment, the recognition of the intrinsic beauty of the countryside, protection of the natural environment and ensuring the residents of the Borough live in well-designed, beautiful and safe places with accessible services and open spaces. Housing delivery is important, but it is not the be-all and end-all of a Plan's role".

4. Urban Regeneration

For the reasons above, it is clear to CPRE Kent that Medway's new Local Plan should unashamedly embrace a true "brownfield-first" spatial strategy. That is, before any greenfield land is released, far more needs to be done to demonstrate that brownfield opportunities have been maximised.

The Council know that those sites in the brownfield register are simply a list of sites already known to it, either as a consequence of a planning application or an existing local plan allocation. These add nothing in terms of identifying future additional supply. It is also the case that very few brownfield sites will ever come forward as part of a call for sites exercise as these are usually in locations where the principle of development is already acceptable, meaning there is very little point in a landowner going through the unnecessary expense of promoting their site through a local plan process. Instead, the real profits are to be made from the promotion of greenfield sites where the principle of development has not been agreed, hence why these naturally dominate any call for sites exercise as set out above.

Instead, a far more proactive approach needs to be undertaken. Key to this will be a full, detailed and up-to-date Urban Capacity review that robustly identifies where further development opportunities are within the urban areas. Alongside this, we would want to see a brownfield land specific call for sites that is advertised as widely as possible. This should include local communities and the general public being encouraged to identify brownfield sites, with the Council working alongside to identify and overcome existing delivery constraints. We as an organisation are happy to work proactively with the Council on this, utilising the CPRE Brownfield land register toolkit which has been developed specifically for this purpose <https://www.cpre.org.uk/resources/brownfield-land-register-toolkit/>. Likewise, we would welcome working with Medway Urban Greenspaces Forum to identify

¹ https://www.adur-worthing.gov.uk/media/Media_168683.smxx.pdf – see paragraph 78 onwards.

where there may be further opportunities for regeneration that's welcomed by communities and developers alike.

With respect to delivery, it has always been our opinion the HIF Funding of £170 million being directed to releasing development upon greenfield sites upon the Hoo Peninsula was a massive, wasted opportunity. Rather, Medway Council should have been doing everything it could to get this funding re-directed to bringing forward the various stalled brownfield sites within the Medway Urban Areas. We are therefore extremely pleased to see that Medway has now just received £3,968,371 from the first phase of the Department for Levelling Up, Housing and Communities Brownfield Land of £60 million to help release brownfield sites, including the Strood Waterfront and the Debenhams building in Chatham. With the second phase of £180 million funding to be released later this year and a total fund of £4.8 billion available, we would expect to see evidence of the Council having been fully engaged in securing the necessary funding to bring forward both the brownfield sites that have currently stalled and new sites identified. We would also expect to see Medway's leaders partnering with Homes England to bring forward identified brownfield sites and regenerating Medway's high streets, where an increased residential offering will be anticipated. We would also expect to see evidence of the Council having fully engaged with all possible delivery partners before deciding that any sustainably located brownfield site is not deliverable.

With respect to density, CPRE Kent will be calling upon the new plan to maximises the development potential of those sites located within the most sustainable areas. This needs to come hand in hand with good design, sufficient infrastructure and in particular sufficient active travel and public transport options that provide a realistic alternative to car dependency, along with sufficient well designed green spaces and inviting public realm environments. Higher density certainly does not have to come at the expense of good planning.

Overall, unless such proactive steps are undertaken, we are not going to accept the usual argument given to CPRE Kent that there are insufficient brownfield sites available for development, leaving no option but to allocate further greenfield land.

5. Suburban Expansion

CPRE Kent could support growth adjoining the existing urban areas to the south and east of Medway if it was demonstrated a true brownfield first approach had been undertaken, vital greenspaces were maintained and enhanced, and that sufficient infrastructure was to be provided. We are however concerned that much of the area identified is Best and Most Versatile land. As set out within CPRE's recent report "Building on our food security"² in the past 12 years England has lost over 14,000 hectares of Grade 1 and 2 agricultural land to development, the equivalent to the productive loss of around 250,000 tonnes of vegetables. It also appears that this figure is increasing. Nationally there has been a 100-fold increase in 2022, from that built on in 2010. This loss cannot continue to be ignored which is why it remains our view that the selection of these site is at odds with NPPF paragraph 174(b). This issue will need to be given significantly more genuine consideration with respect to the allocations which do make it to any submission version of the plan.

Specifically, we would want to see and understand what sequential measures have been undertaken so as to minimise loss of BMV land. We would also want to see how this significant constraint has been given the due regard necessary with both the setting of an appropriate housing figure for Medway and then the site selection process, informing which sites are taken forward to allocation. It is however our starting assumption that any loss of BMV could be avoided.

² <https://www.cpre.org.uk/wp-content/uploads/2022/07/Building-on-our-food-security.pdf>

Where sites on the urban edge are to come forward, we would want to see that sufficient active travel and public transport options that provide a realistic alternative to car dependency are provided. We would also want to see that existing green spaces are sufficient protected and improved/expanded to accommodate an increasing population. Where new land is given over to development, it should be used as efficiently as possible, as appropriate for that site's location. The higher the density, the more benefits accrue, and the more (greenfield) land is saved. High density building does not equate to high rise apartment blocks. CPRE London published a report in 2019 on this issue called 'Double the density³, halve the land needed' which sets out both the benefits of higher density design along with providing examples of higher density developments being achieved by a variety of means. This includes a mixed-use residential development at Springhead Park, Ebbsfleet, Kent where 160dph is being achieved.

6. Rural Development

As alluded to above, we believe it is wrong to simply continue sacrificing yet more greenfield land in an attempt to accommodate what is an unsatisfiable external market demand. We would therefore firmly object to any further allocation upon the Hoo Peninsula beyond that accepted by the existing communities, as needed to maintain and support those communities.

This position is in recognition that the Hoo Peninsula is a largely rural area, containing significant environmental constraints including ancient woodlands, SSSI's, SAC's SPA's and RAMSAR sites. It is also predominately Best and Most Versatile agricultural land and has significant areas of intrinsically dark skies, the loss of which should be strongly resisted. The ecology upon the Hoo Peninsula is extremely sensitive, containing one of the largest breeding sites in the UK for the nightingale population, highly protected water voles along with recently proven habitats of the rare purple emperor butterfly and a rare breed of dormouse. Medway also has at least six red listed rare birds sheltering in its boundaries including the Black Tailed Godwit, the Curlew and the Pochard and many more on the amber list. We note only this September, surveys on the Isle of Grain discovered the extremely rare Shrill Carder Bee only known to be found in seven areas across England and Wales and never before discovered in Kent.

It is also the fact that the Four Elms Hill and Peninsula Way through Chattenden suffers significant levels of air pollution, hence it being designated an Air Quality Management Area (AQMA). The proposed development associated with the £170 HIF funding bid largely sought to justify itself on the basis it was needed to help fund this new road infrastructure. With car ownership and usage rates on the Peninsula already much higher than the rest of Medway, our responses to the various HIF consultations strongly objected to the principle of the building yet more traffic inducing new roads that facilitate building, or "unlocking", greenfield sites. The benefits of new roads schemes are extremely over-stated and in reality, generate traffic above background trends by inducing traffic, which leads to permanent and significant environmental damage. Specifically, and as set out in our *The end of the road? Challenging the road building consensus*, March 2017 <https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>, the building of new roads to accommodate further growth is just going to significantly exacerbate the Peninsula's accepted existing problem with ingrained car dependency.

Even at this early stage in the plan making process, we remain utterly unconvinced that the selection of the Hoo Peninsula for any substantial housing development beyond what is needed to support existing communities would survive the scrutiny of the Local Plan process. Focus therefore must now be on mitigating

³ https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/02/DoubleTheDensityHalveTheLandNeeded_1.pdf

the worst effects of the unplanned windfall development that has taken advantage of the HIF Funding debacle and are now coming forward without any plans for the necessary mitigation being put in place. As a minimum, Medway must be doing all it can to resist these developments as they continue to come forward. The first step to this will be making it as clear as possible, as early as possible, that Medway's new local plan will not be looking to allocate any further significant development upon the Hoo Peninsula

For any allocations upon the Hoo Peninsula to be considered remotely acceptable by us, they would need to be demonstrably sustainable with very genuine levels of self-containment and deliverable sustainable transport options. This may include alternatives to the previously proposed rail station such as zero-emission dedicated bus routes that we are beginning to see elsewhere in Kent, such as Dover's new Fastrack service between Whitfield and Dover - <https://www.dover.gov.uk/Planning/Regeneration/Fastrack/Dover-Fastrack.aspx>.

7. Green Belt Release

CPRE led the campaign for the creation of green belts, the defining feature of which is its permanence; the assurance that it will remain for generations to come to reap the benefits. CPRE Kent would therefore have an in-principle objection to release of greenfield sites within the green belt, particularly within a District that only contains 5% green belt of which much is also part of the North Downs AONB. Against this context, we would find it very difficult to agree that "exceptional circumstances" exist to review the green belt boundary within Medway nor that "very special circumstances" outweighing harm to the green belt would apply to those sites in the green belt under current NPPF policies.

8. Employment Sites

We note that the employment section of the consultation document appears to be the most under-developed section of the document. We also recognise that the Employment Land Need Assessment was undertaken at the height of the Covid-19 pandemic and therefore a number of the assumptions within will need to be reconsidered/updated. There also remains significant uncertainty with respect to the Lower Thames Crossing, though with respect to the London Resort proposal, it looks increasingly unlikely that this will now be occurring and therefore our view is that it should be disregarded for forecasting purposes.

It is CPRE Kent's view that the overprovision of employment space that has no realistic prospect of delivery as employment space alone could be better utilised for housing or mixed-use schemes. It is also our view that Government funding via future Brownfield Land Release Funding could be directed towards the much-needed regeneration of sustainable brownfield sites within the Medway urban area. Again, this would support a truly brownfield first strategy and potential alleviate the need to allocate on greenfield agricultural land. We would also call for the residential density at these urban sites to be sufficiently high to take advantage of the sustainable locations, whilst still providing a realistic level of employment and retail space.

9. Conclusion

CPRE Kent would welcome a Local Plan which genuinely recognised the need to conserve and enhance the natural, built, and historic environment in the manner set out within the draft objectives. We are, however, concerned that the direction of the overall spatial strategy is already being unduly influenced by a desire to meet clearly unsustainable levels of housing growth through greenfield sites which may be available but are not sustainable.

Rather, it is clear to CPRE Kent that Medway should currently be doing everything it can to robustly evidence that a true "brownfield-first" spatial strategy is the correct strategy for Medway, having regard to opportunities and constraints, whilst still delivering the housing and economic growth that the district genuinely needs.

Regulation 18 Local Plan consultation
Medway Council
Gun Wharf, Dock Road
Chatham
Kent, ME4 4TR

E: futuremedway@medway.gov.uk

Sent via email

Dear Sir/Madam,

RE: Medway Council Local Plan Regulation 18 Consultation

I refer to the above consultation and wish to make the following representations on behalf of Maidstone Borough Council (MBC).

As you will be aware, MBC is in the process of reviewing its adopted Local Plan (25 October 2017). The Maidstone Local Plan Review was submitted to the Secretary of State for independent examination on 31 March 2022. The examination is currently in process, with the six-week public consultation on the proposed Main Modifications to the plan having commenced on 29th September 2023. MBC has and will continue to work closely and constructively with Medway Council through the duty to cooperate on strategic matters pertinent to the authorities' respective local plans.

Whilst it is acknowledged that Medway Council have a requirement to meet identified needs, including for housing and economic development, the new Local Plan could have a significant impact on Maidstone Borough residents and businesses as well as the environment and infrastructure. It is therefore imperative that the potential effects of the plan on Medway authority and neighbouring authority areas, including Maidstone, are robustly considered. MBC welcomes the opportunity to continue working with Medway Council to help ensure that any potential adverse impacts resulting from the emerging Local Plan are identified at an early stage so that these can be avoided and/or appropriately mitigated.


The Regulation 18 document identifies four broad categories of locations where development could take place, along with indicative housing capacities for the different areas, based on Medway's Land Availability Assessment (LAA). Of the four broad categories, the 'suburban growth' location and the associated potential expansion sites identified on Map 2 of the consultation document have the greatest potential to impact upon Maidstone borough, through the possible expansion of Lidsing Garden Community.

It is not evident from the consultation document, which of the sites identified on the maps are potential new sites for development and which are sites with existing planning permission and we would welcome clarification on this in future discussions. We also welcome future discussions on the housing capacity of the site that straddles the Medway/Maidstone administrative boundary and would note that part of the site is included within Maidstone's Local Plan Review as a site for motorway junction improvements and environmental mitigation as part of the Lidsing Garden Community development. MBC would welcome future discussions on the general growth aspirations for this area of Medway.

Maidstone Borough Council

Maidstone House,
King Street ME15 6JQ

 maidstone.gov.uk

 [maidstonebc](https://twitter.com/maidstonebc)

 [maidstoneboroughcouncil](https://www.facebook.com/maidstoneboroughcouncil)

6th October 2023

Maidstone Borough Council

Maidstone House,
King Street ME15 6JQ

 maidstone.gov.uk

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 [maidstoneboroughcouncil](https://www.facebook.com/maidstoneboroughcouncil)

Paragraph 6.1 of the Regulation 18 document highlights that infrastructure is a major concern and that there is specific work on transport and infrastructure planning to feed into the draft Plan. MBC is keen to work constructively and cooperatively with Medway on these strategic, cross-boundary issues to ensure are joined up approach to planning across the two authorities' administrative boundary.

MBC notes that the Regulation 18 document does not specifically set out the needs of the Gypsy, Traveller and Travelling Showpeople communities, nor is there reference as to how any identified needs are planned to be met, through land allocations or otherwise. As a potential strategic cross-boundary issue, MBC would welcome the identification of this matter and for subsequent engagement to occur through statutory consultation and the duty to cooperate process in order to appropriately address the needs of these groups through the plan making process. Of note is that MBC is preparing a Gypsy, Traveller and Travelling Showpeople Development Plan Document to address the significant need that exists within its borough. We will continue to engage with Medway Council and other local authorities through the duty to cooperate to ensure housing needs for this group are appropriately addressed through the plan process, in accordance with national planning policy.

Finally, as a neighbouring authority, and with potential development areas identified across and adjacent to the administrative boundary, MBC welcomes further opportunities to engage with the authority through the duty to cooperate.

We look forward to providing further comments when preferred approaches and details of the Local Plan proposals become known.

Sincerely,

Cllr Paul Cooper – Deputy Leader



Hoo Saint Werburgh and Chattenden Parish Council

Email: clerk@hoopc.org

28th October 2023

Hoo and Chattenden St Werburgh Parish Council

Comments in respect Local Plan Consultation Document Published by Medway Council 2023

Medway Council's vision is to "achieve growth for all" to make Medway an excellent place to live, work, learn and visit, but it does not seem to take in consideration, in this statement, for those living and working, on the Peninsula.

The need for new homes, must not detract from the need for an adequate planning process and there must be no shortcuts of the need for proper public consultation. This must never be overlooked or ignored, despite how attractive the site might look to developers and planners. The public opinion must be taken into consideration when attempting to meet the need of Central and Local Government development targets.

It is our belief, that before any developments as proposed in the Local Plan Consultation document should fit all three of the following criteria, to become a sustainable development, those being;

Economic - is the land used in the correct location?

Social - does it meet provision of accessibility to sufficient local services?

Environmental - saving natural resources, minimising pollution, respecting the existing natural environment.

It is important in all scenarios, that the harm to both the unique character and the appearance of the Peninsula cannot be underestimated.

We do not believe that a full sustainability plan has been made or sufficient information published.

We believe that the new consultation documents still place the major development being put onto the Peninsula and particularly Hoo St Werburgh. Why is this necessary?

Why is the allocation for development not proportionally, evenly, and fairly spread across all communities in Medway?

The Peninsula, which has only one major road on, and off it, there is only so much transport capacity. Which in the opinions of many, has now been exceeded with recent housing and commercial

developments, rapidly increasing the problems of 'bottlenecking' the transport system on and off the Peninsula at peak times. So why do Medway continue to target it with large scale housing developments, and from the consultation document, it would appear that the local area is to face increasing Commercial Development. This will bring increasing pressure on the traffic infrastructure, and will add to the increasing Air Pollution problems.

Any local plan is always going to include an increase in housing on the Peninsula, however achieving it, in a sustainable way without harming the Peninsula's natural environment, will need very careful planning, and will need to take in the hopes and needs of those living within the Peninsula already.

The need of a walk in medical centre/cottage hospital is paramount importance to accommodate any extra homes and would make it less challenging for residents to access Medway Hospital, and of course would relieve stress on an often-failing local hospital.

The phrase "affordable housing" is overused and needs much more information on how to define affordable, no mention of "suitable" housing. Given the increase in older population, single storey buildings should be available close to medical and community facilities with good public transport links.

There is also a need for single occupancy homes with an ever-increasing number of people living alone, and of course homes for local born and locally employed people on the Peninsula with a large element of starter homes.

And the need for nursing and care homes is all part of any local community.

And of course, the creation of open recreational areas not only for use of the young and families but from the older people too.

The Hoo Peninsula has had more than its fair share of developments over the last local plan period, But there will be an urgent need for new investment in our area, and with that in mind we have some suggestions for your consideration

To take advantage of all empty property space above shops in high street and shopping centres, which could be developed into compact accommodation, and a complete rethink of large office spaces like Mountbatten House, that could, with encouragement and financial support, be used for single occupancy Use.

The logical conclusion would be to build on areas around Capstone Valley and other smaller areas in the urban area of the Medway Towns with less valuable land.

The advantages of this would be: -

- 1) The farmland is grade 3.
- 2) There is a thriving shopping centre not far away at Hempstead Valley and a bit further down Hoathway, Gillingham Business Park with many large retail outlets, a skating rink, medical facilities, vets, and much more, and a large Tesco and garden centre on the other side of the road. This area alone is the size of Hoo St Werburgh Village.

- 3) Have the council sought to liaise with the neighbouring authority to build up to the Motorway and provide an enhanced road link. There are many miles of open countryside to the south of the motorway easily accessible to residents.
- 4) There is already a large country park and ski slope on the doorstep for the residents to enjoy.
- 5) The area is very close to the M2 providing excellent road links to London and the coast.
- 6) Ash Tree Lane could be improved to give better access to Gillingham from North Dane Way.

Medway is already listed as an area of "Water Stress" and so any developments must be water friendly so rainwater transfer facilities must be incorporated to all new developments.

The use of school sports facilities should be encouraged especially at a time when the council continues to allow social and sports clubs on the Peninsula to be closed down and built on.

Medway council should discourage unwarranted development on agriculture lands, we must protect the high-quality farming land, and the history we have in arable and fruit farming on the Hoo Peninsula. Once this land is concreted on its gone forever

Air quality in and around the Medway tunnel and of course Four Elms Hill and Wainscott areas is a major concern, and any increase in road traffic will exacerbate the levels of nitrogen dioxide. The apparent identification of Medway One as the principle area for expansion of Commercial and Employment opportunities will only increase the already excessive domestic and commercial traffic on the local roads. Thus increasing the Air Pollution levels.

The use of Lodge Hill as a country park would be give not only those on the Peninsula but the whole of Medway a green lung for leisure and recreation and would give much needed health benefits to the whole of Medway's population. In addition the planned expansion of the proposed Green Spaces needs to go ahead, but in the current economic climate there would appear to be no funding to proceed.

Before any further development of the Peninsula can begin, there must be a major investment in the local infrastructure, with improved Public transport, Major Road improvements, Increased medical/dental facilities, increased shopping facilities and improved Leisure facilities. It is important to note that before any further developments, either Domestic or Commercial are approved, these increased facilities must be provided.

Yours faithfully



Mrs S Babington
Parish Clerk
Hoo St Werburgh Parish Council

Town and Parish Council Planning Service

27th October 2023

Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Dear Planning Policy Team

Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
Medway Local Plan Regulation 18 Consultation

We have been asked to make representations on the Medway Local Plan Regulation 18 consultation, on behalf of Hoo St Werburgh and Chattenden Parish Council. The Parish Council objects strongly to the spatial strategy and rural growth proposals contained in the Regulation 18 consultation document.

General Comments

The consultation documents are vague and lack detail and justification. It is unclear how such an unsustainable spatial strategy has been developed. Regulation 18 consultations for other Local Plans in other areas usually include far more information and clarity.

Vision

There is a clear incompatibility between the vision and the later spatial strategy. The vision mentions climate change, protecting heritage and landscapes, strengthening distinct character, valuing the countryside and coast as environmental assets, identifying the estuaries as valued landscapes and habitats. It also recognises that Medway benefits from distinctive towns and villages and that farmland contributes to management of natural resources.

There appears to be a perverse disconnect between these different aspects of the vision and the spatial strategy, which places so much emphasis on obliterating the rural environment within Hoo St Werburgh and Chattenden. The spatial strategy clearly takes no account of climate change, destruction of heritage and landscapes, harm to distinct character, urbanisation of the countryside, harm to the coastal area, erasure of the distinctive identity of villages and loss of grade 1 agricultural land.

Strategic Objectives

There is a similar disconnect between the stated strategic objectives and the rural growth proposals for Hoo St Werburgh and Chattenden. With regard to each of the strategic objectives, we would make the following comments:

Prepared for a sustainable and green future: The growth strategy would fail to manage natural resources (soil) through loss of grade I agricultural land. It would fail to protect natural assets. There is no response to climate change, including rising sea levels.

Supporting people to lead healthy lives and strengthening our communities: The growth strategy would obliterate Hoo and Chattenden village centres within what is effectively a massive urban extension into the rural area.

Securing jobs and developing skills for a competitive economy: The proposed expansion of employment sites could create local economic opportunity, but with high environmental impact and possible harm to the agricultural and rural economy.

Boost pride in Medway through quality and resilient development: The growth strategy clearly fails to respect the historic and natural environment. It directs growth to the rural area, involving massive adverse environmental impacts. There is clearly a complete disregard to the character and variation of local places.

The spatial strategy very clearly undermines the Local Plan's own suggested strategic objectives, in particular through the housing growth proposals.

Spatial Strategy

Paragraph 5.6 indicates that the Sustainability Appraisal will assess the ability of sites to deliver sustainable development, considering constraints and mitigations. It is fairly clear that the rural growth proposals for Hoo St Werburgh and Chattenden are not just unsustainable, but would have devastating impact on Medway's rural environment and economy.

The table on page 15 makes clear that the largest proposed housing growth figure is for rural growth. This is unsustainable and contrary to national policy (see later comments on national policy).

The table indicates an overall delivery figure of 38,216 homes. The housing need figure on page 14 indicates that 19,000 additional dwellings are required, to meet an overall growth figure of 29,000 homes. These figures demonstrate that growth could be accommodated by urban regeneration and suburban growth, with the associated opportunities and benefits. Damaging rural growth is not required to meet housing need. Only proportionate rural growth is required.

The Landscape Sensitivity and Capacity Study highlights the high/medium sensitivity of the proposed housing sites. However, this appears to have had little bearing on the spatial strategy. Also, the landscape assessment misses certain heritage designations and also precedes the Environment Act and other changes to planning policy and guidance. The spatial strategy clearly has very negative impacts on biodiversity.

The withdrawal of the HIF bid clearly undermines the spatial strategy. We note a general comment on providing infrastructure by other means, but without anything more concrete. We are surprised that the Regulation 18 Consultation has been undertaken with such lack of clarity or certainty over how infrastructure would be provided. It is unrealistic and undeliverable without such clarity.

The Parish Council considers that the rural growth element of the spatial strategy is unnecessary and environmentally destructive. This has been pointed out previously, but the community continues to be ignored by Medway Council. There is no economic, social or environmental basis or justification for the spatial strategy. It is incomprehensible why such a clearly inappropriate growth strategy continues to be promoted.

Consideration of National Policy

The consultation document and its spatial strategy appear to have ignored Chapter 5 of the National Planning Policy Framework 2023 (NPPF) in terms of the size and location of sites. Paragraphs 78 and 79 have been ignored completely, despite the spatial strategy referring to rural growth.

There is very clearly a disconnect between the spatial strategy and Chapter 11 of the NPPF with regard to Paragraph 120 (in particular b and c).

It is difficult to see how the requirements of Chapters 14 and 15 have been considered in the selection of sites. Heritage (Chapter 16) has been given little consideration. There can be no confidence in the site selection process, which appears to have given little consideration to national policy, environmental impacts or climate change.

A review of the NPPF is due (a consultation was undertaken at the beginning of the year). This is likely to include changes to housing policy. The enactment of the Environment Act and proposed review of the NPPF will change requirements for considering the natural environment.

Legal Compliance Issues with the Consultation

Hoo St Werburgh and Chattenden Parish Council raised concerns over legal compliance in the previous consultations. There was no feedback on this, but there are clearly implications for the current consultation.

It is unclear how the previous consultation on the Hoo Development Framework Masterplan relates to the current consultation and wider Local Plan process, or how responses to the previous consultation have informed the current consultation documentation, raising further legal compliance issues, against planning law and consultation case law.

We note the land availability assessment is not on the consultation download page, but is available elsewhere. The latest document has an October date and appears to have been uploaded after the consultation start date. This raises further questions over the site assessment and selection process.

Conclusion

Hoo St Werburgh and Chattenden Parish Council objects to the proposed spatial strategy put forward in the consultation document. The grounds for this objection are set out previously in this letter.

In conclusion:

- The spatial strategy would have a destructive impact on the environment and community of Hoo St Werburgh and Chattenden Parish.
- The spatial strategy would fundamentally harm and destroy Medway's rural environment, sensitive landscapes and agricultural land.
- The emphasis of the spatial strategy is on rural growth, which is clearly contrary to NPPF policy.

- The spatial strategy is clearly at odds with the vision and strategic objects contained in the same document.
- The site assessment and selection process appears to have given little or no consideration to environmental impacts or to wider national policy.
- The spatial strategy appears to be unrealistic and undeliverable due to uncertainty over infrastructure provision, raising questions over viability.

Overall, the proposed spatial strategy appears to be the most destructive option for achieving housing growth, especially in terms of community and environmental impacts.

Yours faithfully



Dave Chetwyn MA, MRTPI, IHBC, FIoL, FRSA
Managing Director

30 October 2023



Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Julia Mountford
E: [REDACTED]
DL: [REDACTED]

One Forbury Square
The Forbury
Reading
RG1 3BB
T: +44 (0) 1189 520 500
F: +44 (0) 1189 520 501
savills.com

VIA EMAIL ONLY

Dear Sir/ Madam

Representations on the Regulation 18 Consultation of the Medway Local Plan 2040

Berkeley Homes (East Thames Ltd) Berkeley Modular Factory – Land North of Eschol Road, Hoo

Savills is instructed by Berkely Homes (East Thames Ltd) (BHET) to submit representations in response to the Regulation 18 consultation on the draft Medway Local Plan 2040. The consultation closes on 31st October 2023. These representations are accompanied by a site location plan.

BHET has a current full planning application lodged with Medway Council (Planning Ref: MC/23/0104) for, *“Employment development to provide class B2, B8 uses, including office and research development comprising Class E uses, and associated landscaping, external storage, access and infrastructure.”*

Discussions on the principle of this proposal are well advanced and much of the evidence prepared to support this application remains relevant to the issues being tackled in the emerging Local Plan and have therefore informed this representation. The applicant is involved in discussions with the Council seeking to address technical matters and it is intended that the application will be determined in the coming months. BHET is working proactively to address matters raised during the application and is committed to delivering employment uses on the site.

A site location plan is enclosed; however an extract showing the BHET application site is provided over the page:





About BHET and Berkeley Modular

Berkeley is pioneering the delivery of volumetric Modular housing and has an award-winning record of accomplishment in delivering Modular Housing. This includes the Urban House at Kidbrooke Village, which demonstrates their ability to realise the exceptional design capabilities of modular housing in the UK. Founded in 2017, Berkeley Modular represents a major step forward for the UK housing industry. Combining Berkeley Group's homebuilding expertise with the advanced manufacturing technologies of the aerospace and automotive sectors.

The current application reflects the BHET intention to establish an additional facility within the Kent area close to its existing factory to create a functional relationship between the two facilities and boost the delivery of high-quality homes across the UK.

The BHET Site

The Site comprises 14.27 ha of arable land to the northeast of Eschol Road, Hoo. The site is characterised by a primarily flat landscape with a small number of scattered trees at field boundaries.

The Site is bound to the north by a stream running east-west towards the River Medway. The Hundred of Hoo railway line lies around 100m beyond the stream. The eastern side of the Site has two National Grid electricity pylons with power lines running north-south parallel with the eastern Site boundary. Much of the Site is located within Flood Zone 1, there is an area of land adjacent to an existing ditch, flowing west to east across the Site, which is located within Flood Zones 2 and 3.

The Site benefits from good access to the wider vehicular network with Eschol Road connecting to the A228 Peninsula Way, via Stoke Road and Ropers Lane. The A228 is a dual carriageway which continues south-west before connecting to the A289, which goes on to link with the M2 at Junction 1.

The Site is located approximately 1.5 miles east of the centre of Hoo St Werburgh, 4.5 miles to the north-east of the centre of Chatham as the crow flies (8 miles driving distance due to the river Medway) and around 7 miles from the M2 motorway. A full assessment of the site's opportunities and constraints is provided within the technical documents accompanying the planning application.

The Kingsnorth employment area which incorporates the London Medway Commercial Park and Kingsnorth Industrial Estate occupies land to the east and southeast of the Site. London Medway Commercial Park accommodates several large-scale businesses, including Amazon, Wincanton, Sicame, KKB, I&A Communications and Noatum Logistics.

The London Medway Commercial Park is an existing allocation in the current Medway Local Plan 2003 and is proposed to be carried over into this new Local Plan.

The Regulation 18 Consultation

BHET's current interest in Medway is focused on the Eschol Road site and they are supportive of the potential Kingsnorth allocation as a strategic employment site. However, BHET have considered the whole document and comment as follows.

Vision

The Vision reads, in part, *"By 2040, Medway is responding and adapting to climate change, providing for more sustainable and resilient development... The quality of new development has enhanced Medway's profile, and driven up environmental standards in construction..."*

BHET **supports** this part of the vision. Modular housing has a key role to play in achieving carbon reduction and tackling climate change whilst also helping to meet the local and national housing growth targets.

BHET's modular operations will modernise the production of housing to achieve higher standards of sustainability. The BHET facility will support the move to low carbon housing, which is essential to achieving the national aim of net zero by 2050.

The Vision continues, *"Medway is a leading economic player in the region, supporting the growth of its business base and attracting new investment. It has capitalised on its cluster of higher and further education providers to raise skills levels across the workforce."*

The existing BHET Modular Factory One (BMF1) will have an interdependency with the new factory proposed at Kingsnorth (BMF2). BMF2 will make a significant contribution to the local economy, providing new investment, employment growth (250 staff directly employed) and make use of the clustering of existing and new businesses at Kingsnorth.

The Vision continues, *"Derelict sites at Grain and Kingsnorth on the Hoo Peninsula have been transformed into thriving economic hubs."* BMF2 will continue to deliver that transformation, creating additional and complementary economic activity and investment in the local area. BHET is committed to the delivery of employment uses on the site demonstrated by their planning application submission. As such, BHET are supportive of the economic aspects of the proposed Vision.

Strategic Objectives

BHET is **supportive** of the proposed objectives and considers BMF2 will play an important role in helping to deliver them early in the Plan period.

Prepared for a sustainable and green future

For this objective, the consultation document reads, *"To deliver on the Council's commitment to addressing the Climate Emergency, providing resilience to temperature and climate change through seeking adaptations and mitigation measures, including opportunities to promote carbon reduction and support the transition to 'zero carbon'"*.

As discussed, BHET considers modular housing has a role to play in addressing the climate emergency designated both nationally and locally by providing low carbon housing using a more sustainable construction method. By supporting its principle in the policies of the Local Plan, BHET will be helping to deliver this locally set objective.

The consultation document continues that to help deliver this objective the Council will look, *“To strengthen and develop transport networks providing safe and effective choices for sustainable travel, including improved opportunities for walking and cycling and enhanced public transport services.”*

The site is a sustainable location that will give staff and visitors alike realistic choices for travelling sustainably to the site. There are several Public Rights of Way (PRoW) within the vicinity of BMF2 which provide access to the local walking network. Additionally, this location also benefits from an existing shared pedestrian / cycleway on Eschol Road. At the site frontage, this facility is over 3m wide. This goes on to connect to the wider cycle network, providing dedicated cycle routes to Hoo, and then on to Wainscott (Strood / Rochester). Part of this route forms the National Cycle Route 179.

BHET strongly encourage and support the Council in identifying strategic transport improvements that could be made on the Hoo Peninsula to support economic growth.

Securing jobs and developing skills for a competitive economy

The consultation document reads that to achieve this objective the Council will seek, *“[T]o 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.”*

BHET **fully supports** this objective as it considers that there is strong pent-up demand for industrial and logistical commercial floorspace in the region. The current BMF2 application is supported by an Industrial and Logistics Needs Assessment prepared by Savills.

The Industrial and Logistics (I&L) sector is the strongest performing commercial sector in the UK. As of 2020, this sector employed 3.8 million people, contributing £232 billion in Gross Value Added (GVA) to the UK economy. The sector is also highly productive with GVA per job currently at £58,000, 12% higher than the average of all sectors. Its productivity is also predicted to grow at a faster pace, increasing by 29% between 2025 to 2039, compared to 18% across the UK economy as a whole.

Improving the UK's labour productivity will become increasingly important in a post Brexit world given its important bearing on attracting inward investment, ability to pay higher wages and higher tax revenues. The I&L sector has continued to expand post the Covid-19 pandemic.

The demand for I&L floorspace is highly likely to continue to grow given the ongoing growth in online retailing that is likely to remain above pre-pandemic levels due to increased home working and continued demand for rapid parcel deliveries.

Freight flows are another key driver of I&L floorspace demand. Significant growth is forecast across all freight modes. Brexit and Covid-19 have highlighted the level of interconnectedness of international supply chains and their fragility when one or more links break. Companies have started building up greater resilience in their operating models by moving operations either back to the UK (re-shoring) or closer by (near-shoring) to minimise future supply-chain-induced disruptions.

When assessing I&L needs, Medway is not a market area of its own, but a constituent part of a wider Property Market Area (PMA). Medway is part of the North Kent Functional Economic Market Area (FEMA), which

includes Medway, Dartford, Gravesham, Maidstone and Swale, all linked by the M2 and there are strong commuting links between these places from the residents of the area.

The Greater North Kent Partnership recognises the links between the local authorities that make up this FEMA and is concerned with regenerating the industrial heartlands of these areas. Medway is identified as a major centre for advanced manufacturing in low carbon technologies, as well as home to major energy, port and logistics facilities.

In preparing the BMF2 application, Savills found that the I&L market in the FEMA to be supply constrained when floorspace availability is below 8%. However, Medway's availability in 2022 was just 4%. In the Class B2 market, availability was even lower, with Medway having the lowest availability rate when compared with the other geographies of only 0.4% in 2022. Rents significantly outpaced inflation over the previous decade.

Inevitably, demand now outpaces supply. In the case of Class B2 floorspace, demand has been double the supply in the ten years up to 2022.

This will have the effect of increasing rents to a level that suppresses potential investment in the area with firms unable to afford to move into the area despite the many locational advantages Medway has and existing firms unable to expand. As such, not having adequate commercial floor space allocated in the Local Plan would run contrary to the economic objective. Furthermore, displaced firms, potential or existing, would need to travel further, which is contrary to the Council's planned response to the climate emergency.

Savills has reviewed the evidence informing this review of the Local Plan, the Employment Land Needs Assessment (ELNA) prepared in 2020. Savills considers that the labour demand forecasting model used in the ELNA should be used with caution when considering future I&L land needs, as they tend to underestimate demand. This is because the model does not properly reflect the diversity of the modern I&L job market in regards higher skilled professional roles.

The model also predates the sectors strongest year in 2021. Over the course of 2021, Savills Big Shed Briefing (which assesses I&L premises above 100,000 sqft) found that gross take-up had reached a new annual record of 5.12 million sq. m, 86% above the annual average. Strong take-up has meant that the supply of premises nationwide has fallen at its fastest pace ever recorded.

In Medway alone, Savills estimates that Medway will require 21 ha of B2 land to 2037, which is well above the ELNA's estimate of 3.2 ha to 7.8 ha for B1/c and B2 uses. The allocation of sufficient land for employment uses within the Local Plan is therefore imperative to ensure identified need is met. The potential allocation of the BMF2 site is therefore fully supported as contributing to delivering new employment floorspace within Medway.

The consultation document continues to explain that the Council wishes to *"... gain wide recognition of Medway as a centre for learning and its student base; and realise economic and place-making opportunities associated with the cluster of universities and colleges in Medway."*

The I&L sector provides diverse and well paid jobs, with average pay in the sector higher than the UK average. There is today a higher share of Professional and Associate Professional and Technical roles. These roles are typically associated with higher-skilled engineering and technological professions in response to increased automation and robotics in the sector and more advanced supply chain processes.

These office-based roles are increasingly co-locating alongside production and logistics uses as it is convenient for these people to be closer to the operations they control and analyse. BHET will need a wide range of these skills in the people who will staff BMF2.

BHET is committed to ensuring career pathways for young people, with at least 5% of its employees and people working on their sites are a graduate, apprentice or sponsored student, with a commitment to work with their supply chain to support early careers.

Furthermore, this increased occupational diversity means the I&L sector can play a significant role in re-employing people that have lost jobs in other sectors of the economy, for example following the closure of the Kingsnorth Power Station).

In summary, BHET **supports** the economic objective of this Regulation 18 Consultation, as it would encourage the Council to be ambitious in its allocation of commercial floorspace and ensure that a number and variety of sites are allocated to meet the pent up demand in the area. It is vital that the Council allocates a sufficient number of sites within the Local Plan and BHET therefore fully supports the potential allocation of the BMF2 site.

Potential Employment Sites

Given the scale of demand that exists in Medway for I&L floorspace alone, the proposed employment allocations are **fully supported**, particularly given, *“The majority of the land would be needed for warehousing and distribution activities.”*

The possible strategic allocation at Kingsnorth is absolutely critical to maximising the opportunities that this site presents. The consultation document recognises the potential of this employment site, *“with unique opportunities in specialist sectors, such as energy and green technology, and making use of wharfage facilities.”*

BHET considers the Kingsnorth extension to be the most appropriate place for new commercial floorspace in the boundaries of the district. In preparing the application for BMF2, BHET instructed a Competing Supply Review which considered comparable employment sites proposed to the Council for the 2019 SHLAA and assessed their merits against the application site.

The BMF2 site is 14 hectares with a proposed building of some 30,382 sqm of employment space. Including the application site, only four sites submitted in 2019 had sufficient available space to accommodate BMF2. This further illustrates the paucity of supply in Medway for employment uses and the need for the Council to be ambitious in its allocations.

The BMF2 site has the best connections to motorways, freight handling rail terminals, major ports and the largest available workforce within the average drive time to work in Medway when compared to the alternative available sites. This means it provides the best commercial benefits to the factory, both for supply chains and for the workforce and for delivering a sustainable development. The Kingsnorth allocation is a logical extension to an existing employment area.

The Council’s concerns regarding the existing transport infrastructure are noted and BHET is supportive of the Council in seeking to identify solutions to ensure that the potential impact of the potential strategic employment allocations are mitigated. BHET is committed to working with Medway and National Highways to ensure appropriate solutions can be identified for the Hoo Peninsula to realise its full development potential.

For these reasons, BHET remain fully committed to BMF2 in this location and so **fully support** this consultation identifying Kingsnorth as a potential employment allocation, as it is the draft Hoo Development Framework. The BMF2 site, which forms part of this proposed allocation (SHLAA ref. HHH35), has the best connections to motorways, freight handling rail terminals, major ports and the largest available workforce within the average drive time to work in Medway when compared to the alternative available sites.

BHET remain committed to delivering BMF2 as soon as possible and are targeting 2027-28 for completion. It will provide 250 new jobs early in the Plan period and therefore should be supported as an allocation for employment uses within the Local Plan.

Summary

BHET are supportive of the Visions, Objective and Potential Employment Allocation at Kingsnorth in this consultation. It considers that there is a need for the Council to be ambitious in its Development Strategy and



seek to allocate additional employment land above and beyond the needs previously identified in the ELNA which is already out of date, being based on pre-pandemic assumptions and modelling.

BHET is fully committed to delivering BMF2 at the earliest opportunity and would welcome the opportunity to meet with Council officers to discuss further work and information that would be helpful to reassure the Council that this part of the potential Kingsnorth employment allocation is available, achievable and deliverable.

BHET reserves the right to comment further on subsequent versions of the Local Plan as they are made available for consultation. Should you have any queries in the meantime please do not hesitate to contact me.

Yours faithfully,

Julia Mountford BSc MSc MRTPI
Director



HOUSE OF COMMONS

LONDON SW1A 0AA

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

30 October 2023

Our Ref: ZA34878

Regulation 18 Consultation – Setting the Direction for Medway 2040

I am writing as the Member of Parliament for Chatham & Aylesford in response to Medway Council's Regulation 18 Consultation on its draft Local Plan.

My constituency covers the majority of the Capstone Valley which has for many years faced the prospect of widespread development. Along with local residents and a number of local representatives, I have campaigned against numerous planning applications for over 10 years and am opposed to housebuilding in the area.

My position regarding potential development in the Capstone Valley area remains unchanged. As Medway Council will already be aware, approval has already been given for development at the site referred to as East Hill, with further sites being promoted for potential housebuilding in the wider area, adjacent to existing homes and communities. I also remain committed to opposing Maidstone Borough Council's proposals for a 2000 home Garden Village at Lidsing, bordering my constituency in Lordswood.

Like local residents, I have significant concerns regarding not only the loss of green space as result of the gradual expansion of our existing communities, but the cumulative impact on the local infrastructure. These concerns relate specifically to the lack of effective mitigations generally put in place, including maintaining access to health services like GP appointments, school places and increasing capacity of the local road network. I am already in regular contact with local residents, Medway Council, Kent & Medway ICB and National Highways as the relevant organisations for these issues, as I strongly believe the incremental extending of existing communities overlooks the wider strategic impact on local infrastructure, leading to the overwhelming of vital services many of which are already operating under significant pressure.

Therefore in terms of potential strategic options to meet housing need in Medway I do not believe the "suburban expansion" option discussed in the consultation document, which would include the widespread development of Capstone Valley, is in the best interest of local residents or indeed those who will ultimately live in these new communities.

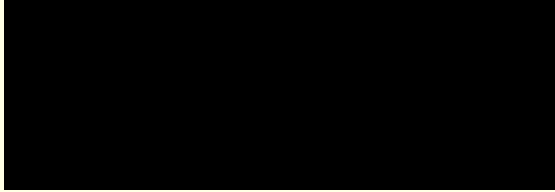
My constituency also represents a number of communities in the Tonbridge & Malling Borough Council area and I note the option discussed in the consultation document for potential development of Green Belt land between Snodland and Halling, which borders my constituency. The Council will already be aware significant development has taken place in this area and I believe further housebuilding in the area would be unsustainable and again, erode further green space between existing communities.



With no Local Plan in place Medway is vulnerable to speculative and inappropriate development. I will continue to make the case for reform of the planning system in Westminster on behalf of local residents and urge the Council to ensure the efficient progress of its draft Local Plan.

I hope the views set out above help make clear my position in how Medway should look to meet its housing need.

Yours sincerely



TRACEY CROUCH CBE MP

planning
transport
design
environment
infrastructure
land

MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE

MILL HILL, GILLINGHAM

LAA REF RN1

OPUS SUBMISSION FORM REF: 264

RESPONDANT ID REF: 193

CLIENT: PERSIMMON HOMES & TAYLOR WIMPEY

October 2023



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1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

- 1.1.1 These representations have been prepared on behalf of Persimmon Homes & Taylor Wimpey in response to Medway Council's '*Setting the direction for Medway 2040*' Regulation 18 Local Plan consultation 2023. The consultation is a statement of the Council's commitment in getting a new Local Plan in place for the period 2022-2040 (18 yrs) and seeks to provide certainty in the direction for Medway's growth.
- 1.1.2 The consultation document is very high level and does not include any preferred strategy for growth but provides options for growth set within the background of the identified housing requirement, the "Vision" and "Strategic Objectives" set by the Council. These representations are made within this context and answer the following key questions:
- 1) Do you have any comments about the proposed vision?
 - 2) Do you have any comments about the proposed strategic objectives?
 - 3) Do you have any comments about the considerations in developing the spatial strategy?
 - 4) Do you have any comments about the interim Land Availability Assessment?
- 1.1.3 In answering the above questions, it has been further demonstrated how land at Mill Road, Gillingham would positively contribute to meeting the strategic objectives of the Local Plan and spatial strategy for growth, which for the reasons we outline must draw on all the spatial options to deliver the identified housing requirement. Whilst the consultation document does not expressly invite comment on individual sites, it is highly pertinent to the consideration of the different spatial strategies to consider the suitability and deliverability of individual sites to ensure the Local Plan is deliverable and thus "Sound" (NPPF, para 35).
- 1.1.4 These representations must be read alongside the on-line form/platform which has been completed.

1.2 SUMMARY

1.2.1 As set out in full in the representation, the Local Plan must:

- Plan to meet its full objectively assessed need. The Council has persistently under delivered against its housing requirement, resulting in a significant housing need, both market and affordable;
- Extend the Plan period until at least 2042, to ensure it covers the required 15yrs at the point of adoption (NPPF, para 22);
- Amend the "Vision" (para 3.1) to include reference to housing. Whilst the "Vision" in general is supported, it is a significant failing that it does not mention the delivery of housing a significant element of the Plan. In not addressing the need to deliver housing as an integral part of the "Vision" it fails to accord with the NPPF (para 15);
- Amend the "Strategic Objectives" to include as an objective on its own the need to deliver housing to meet identified needs. This is necessary to accord with the NPPF (para 20) which requires the inclusion of strategic policies that set out the overall strategy and pattern for spatial growth, including for the provision of housing. The "Strategic Objectives" can therefore not be silent on this matter.
- Ensure the potential supply of housing identified is deliverable and reliable, especially within the early part of the Plan period. Concerns are raised that the identified housing capacity of the respective housing pipelines identified are not accurate and/or are not deliverable within the Plan period, a wide range of sites therefore need to be allocated for development, such as land at Mill Road, Gillingham.
- There is no one spatial strategy that can deliver the Council's full housing need. However, the spatial strategy must include "Suburban Expansion" sites.

1.3 STRUCTURE OF THE DOCUMENT

1.3.1 Below is an overview of the structure of the remainder of the consultation response:

- **Chapter 2** - Provides feedback on the overall vision of the Local Plan;

- **Chapter 3** - Provides commentary on the strategic objectives of the Local Plan;
- **Chapter 4** - Provides a response to the developing spatial strategy development needs of Medway, the housing supply position, pipeline development, windfall Supply and any other potential allocations;
- **Chapter 5** - Provides an overview of the Site setting out the reasons why land at Mill Road, Gillingham should be allocated;
- **Chapter 6** - Sets out the preferred spatial strategy and why this represents the most suitable and thus "Sound" option.
- **Chapter 7** - Provides a response on the land availability assessment; and
- **Chapter 8** - Sets out the overall conclusions.

1.3.1 Each section includes a "summary" which forms the basis of our response on the on-line form/platform.

2 VISION

2.1 THE PLAN PERIOD

- 2.1.1 The “Vision” for the Plan is 2022 - 2040 (18yr period). To provide the required 15 yr Plan period (NPPF, para 22), the Plan must be adopted in 2025. Given the Council’s previous difficulties with progressing its Local Plan, the stage of consultation (Regulation 18), the change in administration, and based on the period of examination of other Local Plans i.e., Maidstone and Tunbridge Wells (over a 1yr) it is unlikely that the Council will be able to submit a Local Plan in 2024 for adoption in 2025. It would therefore be prudent to extend the Plan period until at least 2042 to provide a sufficient buffer should progress with and adoption of the Plan be delayed, ensuring it covers the minimum 15yr period required.
- 2.1.2 Notwithstanding the above, should the Council consider pursuing the Rural Development option as a spatial strategy for growth through the expansion of Hoo, then policies must set out a vision that looks further ahead, at least 30 yrs (NPPF, para 22). Currently the “Vision” fails to do this, only looking to 2040.

2.2 COMMENTS ON THE VISION

- 2.2.1 The “Vision” for Medway encompasses broad policy principles for the future emerging Local Plan covering transport, employment, the environment, retail, waste and minerals.
- 2.2.2 It is noted that the “Vision” seeks to provide more sustainable and resilient development, strengthen and enhance the character of Medway including supporting green infrastructure, create a healthy place in which to live and work and provide decent places to live for all sectors and ages of the community. It further highlights Medway as a leading economic player in the region where it can support the business space attracting new investment. Alongside development, there should also be the provision of improved travel choices and infrastructure provision.
- 2.2.3 However, the “Vision” is silent on its intention to meet its identified housing need. It is similarly silent on its intention of addressing economic/employment needs. In-deed, the overarching principles for the “Vision” fails to identify housing at all (para 3.1) as forming an important component of the Plan.

2.2.4 Whilst the “Vision” talks in general terms about how development is to be provided, central to the “Vision” must be “how much development is provided” as a matter that is fundamental to the framework for growth and spatial strategy as a determinative matter. This is a significant failing, considering the “Context” identifies “the supply of new homes is central to the Local Plan” (para 2.7).

2.2.5 NPPF (para 15) states that:

*The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a **framework for addressing housing needs** and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*

2.2.6 In the absence of the “Vision” setting out its intention of how much development is to be delivered, specifically housing development, it does not provide a positive framework for addressing housing need contrary to the NPPF (para 15). This failing is further perpetrated by the “Strategic Objectives” (see Section 3 of this Statement), which also does not address the scale of housing provision that should be delivered, also contrary to the NPPF (para 20). This underlines the importance of the “Vision” setting out the intentions for growth.

2.2.7 The “Vision” as set out at para 3.1 must be amended as follows (new text in red):

*The policies and growth strategy in the new Plan will deliver the vision for what we want to achieve for Medway by 2040. Our thoughts for what this vision could look like are set out below. The vision encompasses all aspects of policies in the new Local Plan, including **housing**, transport, environment, retail, **employment** and waste and minerals.*

2.2.8 Allied to this, a new paragraph must be added, or existing paragraphs amended as part of the “Vision” clearly setting out the intention of the Local Plan to meet identified housing and employment needs. The 7th paragraph (un-numbered) could be amended as follows:

***The Plan will seek to deliver at least 28,500 new homes** to ensure the needs of all sections and ages of the community can find decent places to live. The quality of new development has enhanced Medway’s profile, and driven up environmental standards in construction, and older properties have been retro-fitted to improve sustainability. Custom and self-build housing has provided new living opportunities for residents. Investment in new services and infrastructure, such as transport, schools, healthcare and open*

spaces, has supported house building to provide a good quality of life for residents.

- 2.18 The proposed change aligns with the “Development Needs” (para 5.4), which as set out in Section 4 of this statement the Plan must seek to deliver on.
- 2.19 The outlined changes are essential to ensure the Plan is “Positively Prepared”, “Consistent with National Policy” and therefore “Sound” (NPPF, para 35).

2.3 SUMMARY

- 2.3.1 The Plan period is insufficient and should be extended to at least 2042 allowing sufficient time for its adoption which is unlikely to happen in 2025, ensuring it covers the required 15yrs (NPPF, para 22).
- 2.3.2 Contrary to the requirements of the NPPF (para 15), the “Vision” fails to identify the provision of housing as an important component of the Plan (para 3.1) and does not set out how much development should be provided for. This is a central component of the Plan as a determinative matter for the spatial strategy. In not expressing the amount of development that is to be delivered, it also fails to be positively prepared and provide a suitable framework for addressing housing needs. The “Vision” must be amended at para 3.1 to reference housing and the supporting text amended to include reference to the delivery of at least 28,500 new homes.

3 STRATEGIC OBJECTIVES

3.1 COMMENTS ON THE STRATEGIC OBJECTIVES

- 3.1.1 The consultation document sets out four strategic objectives to positively plan for the development and infrastructure needs of Medway whilst conserving and enhancing the natural, built and historic environment. The objectives are:
- Prepared for a sustainable and green future;
 - Supporting people to lead healthy lives and strengthen our communities;
 - Securing jobs and developing skills for competitive economy; and
 - Boost pride in Medway through quality and resilient development.
- 3.1.2 As set out in the Plan (para 4.1), the objectives are to “*feed into the wording of policies and how sites and different locations are assessed for potential development*”. It is therefore notable that there is no strategic objective dealing expressly with the amount of housing that needs to be delivered.
- 3.1.3 Whilst it is acknowledged that in general terms the objective of “Supporting People to Lead Healthy Lives and Strengthening Our Communities” mentions in general terms the types of housing to be delivered, but it does not set out how much. This is a determining factor in deciding what is the most appropriate spatial strategy and should inform the basis of future strategic policies, as required by the NPPF (para 20 and 23). In accordance with the NPPF (para 11), this should also reflect as a minimum the objectively assessed need (28,500 new homes or 1,667 pa)
- 3.1.4 In the absence of clearly setting out what the housing requirement is and whether the Plan is looking to meet its need (which it should, see Section 4), the process of using the stated objectives to inform the Council’s assessment of different sites and locations for development cannot be considered as “Positively Prepared” or “Justified”, contrary to the NPPF (para 35).
- 3.1.5 The “Strategic Objectives” must therefore be either expanded to include the amount of housing that is to be planned for, which must reflect the objectively assessed need as a minimum (NPPF, para 11b) or a new objective added which identifies this.

- 3.1.6 With regards to the spatial objectives more generally, the general principles are supported. However, they further highlight the need for the amount of development to be planned for must be expressed as an objective, since many of the other objectives are dependant on the delivery of housing including the ambitions for improved employment floorspace and higher value employment opportunities, which are also reliant on providing enough housing.
- 3.1.7 More generally, the objectives also only talk about development on brownfield land as part of its regeneration objectives. The objectives do not directly address the need to release greenfield land for development. This is misleading, since the release of greenfield sites is essential to meeting the objectives of the Plan and therefore must be referenced for clarity.
- 3.1.8 The consultation document (para 5.11) further mentions that the “*the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham’s housing needs, following a request from the neighbouring authority*”. Again, the strategic objectives are silent on this matter, and it must be clarified whether the Council intends the Plan to help address this need, as a matter which is highly formative to the distribution of growth and selection of housing sites.

3.2 SUMMARY

- 3.2.1 The strategic objectives as currently drafted do not provide a “Sound” basis to inform the development strategy, site selection or future planning policies, where they fail to set out the amount of development that is to be planned for. This is fundamental to informing the spatial strategy and policy making, especially in respect of setting strategic policies (NPPF, para 20). The objectives must therefore either be expanded or a new objective added which sets out that the Plan seeks to deliver its full objectively assessed need as a minimum (NPPF, para 11b). Furthermore, that greenfield land must be released to deliver this.

4 DEVELOPING A SPATIAL STRATEGY

4.1 DEVELOPMENT NEEDS

- 4.1.1 The consultation document (para 5.3) sets out the development needs of Medway, identifying a current housing need of 1,667 homes pa or circa 28,500 over the Plan period (2022-2040). Para 5.4 casts doubt about whether this is an appropriate figure. However, it is considered essential that the Plan seeks to deliver development that meets Medway's objectively assessed need in full.
- 4.1.2 As evidenced in Table 3.1, the Council has consistently failed to deliver against its housing requirement since 1986, with it last meeting its requirement in only two consecutive years in 2008/08 and 2009/10. This has no doubt lead to the current acute shortage of housing in Medway and current identified need. During this time the need for affordable housing has also become even more acute, with an identified annual need for 870 affordable homes pa (Medway Local Housing Needs Assessment, October 2021, prepared by Arc4).
- 4.1.3 The growing need for both market and affordable housing lends emphasis to the requirement for the Council to plan to meet its full objectively assessed need, as required by the NPPF (para 11b and para 23), supporting the Government's objectives to significantly boost the supply of homes (NPPF, para 60).

Summary of Historic Housing Delivery in Medway			
Year	Completions	Requirement (at that time)	Difference
1986/87	1,118	1160	-42
1987/88	821	1160	-339
1988/89	1,454	1160	294
1989/90	1,467	1160	307
1990/91	391	1160	-769
1991/92	825	900	-75
1992/93	769	900	-131
1993/94	669	900	-231
1994/95	546	900	-354
1995/96	644	900	-256
1996/97	598	900	-302
1997/98	702	900	-198
1998/99	698	900	-202
1999/20	719	900	-181
2000/01	603	700	-97

2001/02	603	700	-97
2002/03	676	700	-24
2003/04	733	700	+33
2004/05	646	700	-54
2005/06	562	700	-138
2006/07	591	815	-224
2007/08	761	815	-54
2008/09	914	815	99
2009/10	972	815	157
2010/11	657	815	-158
2011/12	809	815	-6
2012/13	556	815	-259
2013/14	579	1000	-421
2014/15	483	1,000	-517
2015/16	553	1,000	-447
2016/17	642	1,000	-358
2017/18	680	1,334	-654
2018/19	647	1,683	-1,036
2019/20	1,130	1,662	-532
2020/21	1,087	1,586	-504
2021/22	1,102	1,657	-573
1986/87- 2021/22	27,407	35,727	-8,320

TABLE 3.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

- 4.1.4 It is noted that Gravesham Borough Council through its previous Regulation 18 consultation asked Medway to take 2,000 homes to assist it in meeting its housing need. Therefore, it is even more pressing that that the Council plans to meet its housing objective in full, since this could contribute to a worsening housing supply and affordability, if there is consistent under delivery of housing in this part of Kent (if Gravesham does not meet its needs). Medway Council should therefore work with Gravesham Borough Council to determine if it needs to and/or can accommodate any of its needs, to ensure the Plan is "Positively Prepared" (NPPF, para 35).
- 4.1.5 As a minimum, the objective to meet the objectively assessed need in full is supported, as required by National policy, with the Council to explore further whether it also needs to plan to meet any needs arising from Gravesham Borough Council or any other Council's (as appropriate) i.e Tonbridge & Malling, which also borders Medway.

4.2 HOUSING SUPPLY

- 4.2.1 The consultation document sets out the need for 1,667 homes per annum, equivalent to 28,312 homes up to 2040 (circa 28,500 homes). The below section considers the potential pipeline supply of sites, with reference to the Land Availability Assessment (LAA), Interim Report, September 2023. Considering the supply of sites and their relative suitability and deliverability is highly relevant to the spatial strategy and potential preferred approach considered in Section 5.

Pipeline Development

- 4.2.2 A pipeline supply of sites with planning permission for 7,583 homes, of which 2,061 homes are under construction as of 31 March 2023 is identified.
- 4.2.3 Based on the level of information available, it is difficult to determine with any level of certainty whether the purported supply is reliable. However, we have concerns over double counting on several of the sites shown in Appendix C and D of the LAA around Strood waterfront, the urban edge of Strood North and Finsbury, Cliff Woods and Rainham as several of the sites identified in Appendix D have been delivering homes before the start of the identified plan period in 2022. The Council should make it clear through its future evidence base how units delivered before 2022 have not been counted towards the overall supply.
- 4.2.4 Furthermore, it cannot be assumed that each one of these sites will come forward or come forward in full. For instance, consents can lapse or the full development potential of a site is not achieved, for example reserved matters is granted for fewer homes than consented under an Outline permission. Based on previous delivery rates, a discount rate must therefore be applied, allowing for an element of under implementation. As such the full 7,583 homes cannot be relied upon as part of the spatial strategy.

Windfall Supply

- 4.2.5 Windfall development is defined at Annex 2 of the NPPF as sites not specifically identified in the Development Plan.
- 4.2.6 The NPPF (para 71) sets out 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**. Any allowance should be realistic having regard*

to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. (Our emphasis)

- 4.2.7 The consultation document sets out that 3,000 homes will be delivered from windfall sites. The Council has published a Housing Delivery Test (HDT) Action Plan (July 2022) as it has not met the requirements of the HDT 2021. This action plan identifies the delivery of large/windfall dwellings which on average since 2012 have delivered 919 dwellings per annum. This provides data on the historic delivery of windfall sites in Medway.
- 4.2.8 As acknowledged in the NPPF (para 71), the Council can make reference to historic windfall delivery. However, this must be considered in the context that the Council has not had an up-to-date Local Plan for 20yrs. The vast majority of sites that have come forward are therefore not allocated and thus contribute to windfall provision. This significantly distorts the windfall delivery rate.
- 4.2.9 Whilst the data provided in the HDT Action Plan (July 2022) may on the face of it provide the justification for a higher windfall rate, it is unclear as to how exactly the Council has arrived at a figure of 3,000 without an appropriate methodology being published. Though our experience, we are also aware that historically a high proportion of homes have come forward on brownfield windfall sites. The supply of such sites is not exhaustive, and it is noted that a significant number of brownfield sites are also identified in "Urban Regeneration" spatial strategy. There is therefore a high potential for doubling counting (brownfield sites propping up windfall supply but are then also allocated).
- 4.2.10 The 3,000 dwellings given over to the windfall allowance therefore seems optimistically high, especially where this does not count to the first five years of supply. In the absence of any detailed evidence, it is considered that the Council do not have a compelling case to rely on the delivery of 3,000 homes. The windfall supply through the Plan period should therefore be reduced.

Potential Allocations

- 4.2.11 The LAA identifies 447 sites across Medway that have the potential to supply 38,216 homes. This is above the housing requirement of the 28,312 homes (+ 9,904 homes). The sites can be broken down into four distinctive categories, which form the different spatial strategy options as follows:
- Urban regeneration;
 - Suburban growth;

- Rural development; and
- Green Belt loss.

4.2.12 The remainder of this section analyses the potential capacity of each category.

Urban Regeneration Sites

4.2.13 The urban regeneration sites make up the second largest element of the potential supply, with the potential deliver 11,151 homes.

4.2.14 We have significant concerns regarding the reliability of this supply on the basis:

- The development potential of many of the sites has been known about for some time, but they have yet/failed to come forward, including within more economically buoyant times, because of issues of viability or technical constraints;
- Several of the sites are known to have complex landownership/leasehold constraints, preventing or delaying delivery;
- The requirement to provide BNG is likely to be a significant constraint to brownfield sites coming forward, especially smaller sites.

Suburban growth

4.2.15 Suburban Growth has the potential to supply 9,680 homes. Several sites within this category are not considered suitable, such as:

- In Capstone and Darland in areas of local landscape importance/sensitivity adjacent to or in the Country Park or being sites of special nature conservation/local nature reserves;
- Sites on the southern boundary of Medway's administrative area with Maidstone Borough Council where there are long-standing concerns regarding deliverability due to issues of access and landownership, resulting in lapsed consents;
- Sites to the north of the settlement confines of Rainham, which have been subject to previous unsuccessful Appeals must be discounted, including sites detached from the urban area, which do not form a logical extension or outpost for development, being unsustainably located.

Rural Development

- 4.2.16 Rural development has the potential to supply 14,736 homes. The majority of the rural housing sites are on the Hoo Peninsula centred around the settlements of Chatterden, Cliffe, Cliffe Woods, Allhallows, Hoo St Werburgh High Hailstow, Lower Stoke and the Isle of Grain.
- 4.2.17 This is the single potential largest supply of housing. The following concerns are raised regarding many of the sites.
- The sites identified around the settlements of Allhallows, the Isle of Grain and Lower Stoke are within the periphery of Medway's administrative area with limited access to sustainable modes of transport and every-day services to meet the needs of the existing and future residents of the settlement. Many of the sites proposed for development in these areas are large and propose a scale of development that is either disproportionate to the settlement and/or is unsustainably located having regard to the Council's strategic objectives;
 - The peripheral sites around the edge of Cliffe Woods do not form logical extensions to the settlement in this Plan period given the existing pipeline of development to the south and west of the settlement that have either been granted planning permission all have live planning applications submitted to the Council;
 - Development whether it be for future employment, residential or mixed-use development on the Hoo Peninsula is reliant on the existing road network. Medway Council lost its Housing Infrastructure Funding (HIF) of £170 million in July 2023 to deliver the expansion of Hoo. This significantly reduces the ability of any development in Hoo to form a reliable part of the Council's housing land supply and therefore cannot be relied upon.

Green Belt Loss

- 4.2.18 Only represents a potential supply for 2,649 homes and therefore cannot be considered a suitable spatial strategy in light of the housing need.

4.3 SUMMARY

- 4.3.1 There are significant concerns regarding the pipeline supply and windfall allowance, how these have been calculated and whether they can form a reliable

part of the Council's housing land supply. The number of sites needing to be allocated for housing is therefore likely to be higher than currently anticipated.

- 4.3.2 In addition, no one of the spatial options can deliver on the Council's housing requirement. A combination of options is therefore essential to ensuring the objectively assessed need is met, including allocating sites within the "Suburban Expansion" option, such as Land at Mill Road, Gillingham, as set out in Section 5.

5 LAND AT MILL ROAD, GILLINGHAM

5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

- 5.1.1 The Site has been promoted through the LAA (REF RN1) for residential development. The Site is included within the Suburban Expansion opportunity. The allocation of the Site for circa 100 homes would offer the following:

Deliverability within 5 yrs

- The Site is controlled by two National housebuilders with a strong track record of delivery in Medway.
- The Site is not constrained and is of a size that can be delivered within 5 years ensuring it can contribute to the immediate supply of housing.
- There are no viability constraints, meaning unlike some regeneration sites, the proposals will be able to deliver affordable housing in line with policy requirements, contributing to meeting a significant unmet need.

Contributing to a range of sites

- To secure a robust and deliverable housing land supply, the NPPF (para 69) advocates Local Plans identifying a mix and range of small and medium sized sites, recognising the important contribution these can make to housing land supply, since they are often built out quickly. The Site would contribute to this, as well as contribute to providing variety in terms of location to respond to different market needs.
- Contribute to the provision of family housing. The urban regeneration sites are more likely to include higher proportions of apartments and a mix of housing types will be required to meet different needs.

Opportunities

- The Site is well located close to existing services and facilities and would represent a sustainable urban extension, which would contribute to the upgrading of existing facilities to meet its residents needs.
- The Site is not of a size that it would significantly contribute towards highway constraints and could come forward in the immediate term. The

Site is however well related to existing pedestrian and cycle transport links and is therefore accessible by a range of modes of transport.

- Many of the sites identified within the Suburban Extensions and Rural Development Sites lie with an ALLI, which cover much of Medway. The Site is well contained and is not publicly accessible, the Site's contribution to function and purpose of the "Gillingham Riverside" ALLI is therefore limited. As such, the development of the Site will not undermine the purpose and function of the ALLI and would therefore have limited landscape impacts, unlike many of the other sites put forward.
- The Site is paddocks and is of low ecological value. The development is not constrained by ecology, and it is expected that 10% BNG can be easily achieved on the Site.
- Development can be positioned outside the areas of flood risk, which cover only a small proportion of the Site. These areas provide opportunities for open space and ecological enhancement through the provision of new/more varied habitats.
- The consultation document recognises that a number of the sites within the Suburban Expansion spatial strategy include Grade I Agricultural Land. However, this is common to much of Medway and the need to develop on Grade I is likely to be required. However, this Site is made up of (two quite small and constrained sites for farming, currently used as paddocks), BMV is not considered to be a constraint to development and its loss outweighed by the significant housing need.
- The Site is not constrained by any heritage considerations.

5.1.2 The Site is located in a highly sustainable and accessible location. The Site is relatively unconstrained, with no constraints identified that would prevent it coming forward for housing. The development of the Site for housing therefore provides the opportunity to support the ongoing regeneration of Medway, by delivering growth and contributing to the viability of Gillingham. Furthermore, it would provide an important contribution towards the immediate supply of housing and diversification of sites in line with the NPPF (para 69).

6 PREFERRED SPATIAL STRATEGY

6.1 PREFERRED SPATIAL STRATEGY

- 6.1.1 As is evident from Table 1 of the consultation document no single development scenario supplies enough homes to meet the objectively assessed need. The consultation document is therefore misleading in asking for comments on a preferred development option (suggesting there is only one option for growth), when a combination of all the options is likely to be required. However, having regard to the Site at Section 5, the preferred development option is "Suburban Expansion".

Option 2 - Suburban Expansion

- 6.1.2 This focuses on land around Gillingham, Rainham and the south of the administrative area in Capstone. Whilst we have raised concerns about several of the sites within this category coming forward, this is the preferred spatial strategy, where in the main they relate well to the existing urban area and form sensible and sustainable extensions.
- 6.1.3 Since these sites are greenfield sites and therefore most likely to be deliverable over the Plan period, (especially within the first 5 years), they form a more reliable supply. They are also more likely to be able to secure community benefits and infrastructure, including much needed affordable housing and unlikely to be constrained by issues of viability, such as sites under Option 1 (Urban Regeneration) and 3 (Rural Expansion).
- 6.1.4 Sites such as Land at Mill Road will form an important part of the Council's supply, being unconstrained and can be delivered quickly allowing time for larger more complex sites to come forward, later in the Plan period.

6.2 SUMMARY

- 6.2.1 To meet the identified housing requirement in full, housing will need to be allocated drawing on a number of the spatial strategies. However, the preferred spatial strategy is the suburban expansion strategy, which must include Land at Mill Road, Gillingham.

7 OTHER COMMENTS ON THE LAND AVAILABILITY ASSESSMENT

- 7.1.1 No comments at this stage. However, at this stage it is noted that it does not include any technical analysis and we reserved the right to comment on the LAA at a later stage.

8 CONCLUSIONS

8.1 OVERALL SUMMARY

- 8.1.1 Plan to meet its full objectively assessed need. The Council has persistently under delivered against its housing requirement, resulting in a significant housing need, both market and affordable.
- 8.1.2 Extend the Plan period until at least 2042, to ensure it covers the required 15yrs at the point of adoption (NPPF, para 22).
- 8.1.3 Amend the "Vision" (para 3.1) to include reference to housing. Whilst the "Vision" in general is supported, it is a significant failing that it does not mention the delivery of housing, a significant element of the Plan. In not addressing the need to deliver housing as an integral part of the "Vision" it fails to accord with the NPPF (para 15).
- 8.1.4 Amend the "Strategic Objectives" to include as an objective on its own the need to deliver housing to meet identified needs. This is necessary to accord with the NPPF (para 20) which requires the inclusion of strategic policies that set out the overall strategy and pattern for spatial growth, including for the provision of housing. The "Strategic Objectives" can therefore not be silent on this matter.
- 8.1.5 Ensure the potential supply of housing identified is deliverable and reliable, especially within the early part of the Plan period. Concerns are raised that the identified housing capacity of the respective housing pipelines identified are not accurate and/or are not deliverable within the Plan period, a wide range of sites therefore need to be allocated for development, such as land at Mill Road, Gillingham.
- 8.1.6 There is no one spatial strategy that can deliver the Council's full housing need. However, the spatial strategy must include "Suburban Expansion" sites.



Medway Local Plan (Setting the Direction for Medway 2040) Regulation 18 Consultation Representations

On behalf of **Redrow Homes (South East) Ltd**

Client Logo

Project Ref: 34743/001 | Rev: AA | Date: October 2023

Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU

Office Address: 26 Kings Hill Avenue, Kings Hill, West Malling, Kent ME19 4AE

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

Revision	Date	Description	Prepared	Reviewed	Approved

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Appendix 1	-	Site Location Plan
Appendix 2	-	Landscape Appraisal and Green Belt Review (April 2018)

1.0 INTRODUCTION

1.1 These representations are submitted on behalf of Redrow Homes (South East) Ltd in response to Medway Council's Local Plan (Setting the Direction for Medway 2040) Regulation 18 Consultation published in September 2023. As a landowner within Medway, Redrow Homes has a direct interest in the Local Plan and the long-term development strategy for Medway.

1.2 These representations focus on promoting Redrow Homes site known as 'The North Field, Halling' (The Site). A Site Location Plan is included at Appendix 1. The Site forms part of the wider St. Andrew's Park Development which was delivered by Redrow Homes (hybrid planning application reference: MC/12/1791) for 385 dwellings and associated mix of uses. The Site currently lies within the Green Belt.

i) Previous Representations

1.3 The Site has been promoted through the previous Local Plan consultation process which took place during 2016 - 2018. As part of the work undertaken to support the development potential of the Site, a Landscape Appraisal and Green Belt Review was undertaken in February 2016 and subsequently updated in June 2018 (Appendix 2).

1.4 More recently, the Site was put forward as part of the Call for Sites process undertaken by Medway Council in February 2023 (Site ID: CHR7). The Land Availability Assessment Interim Report (October 2023) which supports the Local Plan consultation confirms that the Site has progressed towards a Stage 2 (Site Assessment) and we welcome that further detailed consideration of the development potential of the Site will be reviewed by Medway Council.

ii) Site Overview

1.5 The Site comprises 6.84ha of land that has the potential to deliver up to 50 dwellings. It is surrounded by built development on all sides, being bound by residential development to the north, west and south, with the A228 running directly to the east of the site.

1.6 The Site itself is currently an unmanaged, sloping field with land rising from east to west, comprising a block of woodland in the southern corner adjoining the A228 and an area of scrub/woodland to the south-western corner adjoining Pilgrims Way/Road. A low voltage (33kv) overhead powerline crosses from west to east on the southern edge of the Site.

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

iii) Content of Representations

- 1.8 The consultation document and the strategy for the preparation of a new Local Plan, has been assessed on the basis of National policies as set out in Section 2.0. These representations are structured as follows and provide a response to the following matters/questions:

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

2.0 NATIONAL PLANNING POLICY & STRATEGIC POLICY

i) National Policy & Plan Making

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

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

(Paragraph 8)

2.2 Para. 11 notes that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- Local Planning Authorities (LPAs) 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 and adapt to climate change;
- Strategic policies should as a minimum provide for objectively assessed needs, as well as any needs that cannot be met within neighbouring areas, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies

in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted.

- 2.3 The NPPF recognises that, to support the Government’s objective of significantly boosting the supply of homes, it is important that sufficient amount and variety of land can come forward where it is needed. (Paragraph 60).
- 2.4 Planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Planning policies should promote and support the development of under-utilised land and buildings. (Paragraphs 119 and 120).
- 2.5 Paragraph 122 confirms that planning policies need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability.
- 2.6 LPAs should ‘submit a plan for examination which it considers is “sound” – namely that is:
- **Positively prepared** – the plan should be prepared based on a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – the plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

(Paragraph 35)

- 2.7 The NPPF considers that Local Plans should:
- be prepared with the objective of contributing to the achievement of sustainable development;
 - be prepared positively, in a way that is aspirational but deliverable;
 - be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation;
- serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). (Paragraph 16).

2.8 Paragraph 20 notes that Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- housing (including affordable housing), employment, retail, leisure and other commercial development;
- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater;
- flood risk and coastal change management, and the provision of minerals and energy (including heat);
- community facilities (such as health, education and cultural infrastructure); and
- conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

2.9 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. (Paragraph 22).

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

(Paragraph 23)

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

ii) Duty to Co-Operate

2.12 The 'Duty to Co-operate' between LPAs is a clear requirement of National planning policy; ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs

that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to strategic matters (Paragraph 24).

- 2.13 In addition, Paragraph 26 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and relevant bodies is integral to the production of a positively prepared and justified strategy. This should be demonstrated through the preparation and maintenance of one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.

(Paragraphs 26 and 27)

iii) National Policy & Housing Need

- 2.14 The NPPF (para. 61) confirms that strategic policies should be informed by a local housing needs assessment, produced using the standard method unless exceptional circumstances justify an alternative approach which reflects current and future demographic trends and market signals. Furthermore, any housing needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

iv) National Planning Practice Guidance

- 2.15 The National Planning Practice Guidance (NPPG) builds on the principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance.
- 2.16 We have also had regard to the various provisions of the Government's Planning Practice Guidance (PPG), in particular "Guidance on plan-making"¹ and sections:

- Maintaining Effective Cooperation [Para: 009 Ref ID: 61-009-20190315] onwards;
- Evidence Base [Para: 034 Ref ID: 61-034-20190315] onwards.

v) Government Guidance on Green Belt

- 2.17 In September 2012, the Communities Secretary of State issued a Ministerial Statement covering housing and growth. The Statement, amongst other matters, recognises the importance of protecting the Green Belt against urban sprawl whilst also acknowledging that LPAs can review local designations through plan-making, where appropriate to do so, to promote growth. The Statement notes that:

¹ <https://www.gov.uk/guidance/plan-making>

“We encourage councils to use the flexibilities set out in the National Planning Policy Framework to tailor the extent of Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered in reviewing or drawing up local plans, we will support councils to move quickly through the process by prioritising their Local Plan examinations... There is considerable previously developed land in many Green Belt areas, which could be put to more productive use. We encourage councils to make best use of this land, whilst protecting the openness of the Green Belt in line with the requirements in the National Planning Policy Framework.”

2.18 The Government recognises that Green Belt reviews can support growth under local circumstances.

3.0 RESPONSE TO CONSULTATION

i) Vision for Medway

- 3.1 We **support** the vision and aims set out within the consultation document which seek to promote sustainable growth and development within Medway. It is considered that the Site can play a small but valuable role in supporting these aims, as subject to a limited release of poorly performing Green Belt land it can realise the delivery of new homes at a sustainable location in a way that comprises a logical extension to the St Andrews Park community.

ii) Strategic Objectives

Prepared for a Sustainable and Green Future

- 3.2 We **support** the objectives for growth in Medway to provide a sustainable and green future, and opportunities to promote carbon reduction. Redrow Homes is supportive of the delivery of 'green growth' recognising the climate change challenges that will be faced over the Plan period and beyond, and actively delivers homes and new communities with sustainability principles at the forefront.
- 3.3 Redrow Homes is committed to achieving net zero greenhouse gas emissions by no later than 2050, and its resource efficiency and climate change strategy seeks to achieve decarbonisation across the whole of the value chain, whilst ensuring the company is resilient and adaptive to a changing climate.

Supporting People to Lead Healthy Lives and Strengthening our Communities

- 3.4 The objectives seek to strengthen the role of Medway's town, neighbourhood and village centres to secure a range of accessible services and facilities for local communities. In terms of rural areas, the PPG recognises that "A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities." (Reference ID: 50-001-20140306).
- 3.5 To this extent, we consider that development at the Site would help to maintain and enhance the vitality of existing services and facilities located in Halling and would complement the existing recently constructed development at St Andrews Park which is successfully establishing itself as a new community in the village.

- 3.6 The delivery of new homes at the Site would support these objectives by providing for sustainable growth in a location where there is very limited capacity for development elsewhere in Halling, due to constraints such as the AONB and lack of alternative available land.

Boost Pride in Medway through Quality and Resilient Development

- 3.7 We support these objectives which seek to ensure the timely delivery of infrastructure to meet the growing and changing needs of Medway's communities, to direct growth to the most sustainable locations, to respect the natural and historic environment, to make the best use of brownfield land and to encourage greener construction.
- 3.8 We consider that the Site represents an excellent opportunity to deliver on these objectives as a sustainably located modest extension to the St. Andrew's Park development, which can be designed in a way that complements the high quality character and design of the neighbouring development, as well as providing for opportunities for enhancing and supplementing existing green infrastructure.
- 3.9 Whilst we support the objective of making the best use of brownfield land in line with National policy, we also acknowledge that a range of potential locations for development should be considered to effectively support Medway's housing needs over the Plan period as identified within the consultation. This includes Green Belt release. We consider that the Site is suitable for localised Green Belt release, as supported by the 'Landscape Appraisal and Green Belt Review' we included in our representations to Medway Council's 2018 consultation on the 'Development Strategy' document.
- 3.10 The release of the Site will enable the delivery of additional new homes including affordable housing in a way that will integrate into the St. Andrew's Park development, contributing to the character of Medway in this location.

iii) Developing a Spatial Strategy

Development Needs

- 3.11 The consultation confirms that Medway needs 28,339 homes over the Plan period up to 2040. A buffer has been added to take into account non-delivery which brings this requirement to 29,000 homes. This equates to a buffer of approximately 2.3%. However, this is not in line with the NPPF (para. 74) and NPPG which confirms that Local Planning Authorities should add a minimum 5% buffer which is necessary to ensure choice and competition in the market. (Paragraph: 022 Reference ID: 68-022-20190722). With a 5% buffer, this brings the housing requirement to 29,756 homes.

- 3.12 Furthermore, the consultation identifies that consideration needs to be given as to whether Authority can provide 2,000 homes to meet Gravesham's needs (para. 5.11).
- 3.13 With this in mind, Medway Council should review whether it is appropriate to include for a 10% or 20% buffer to take into account previous shortfalls against the housing requirement and unmet needs from Gravesham. These options should be reviewed within the next iteration of the Local Plan.
- 3.14 The consultation document recognises that Medway's housing development needs will need to be aligned with current Government policy as set out within the NPPF and the use of the Standard Method for calculating housing need. Whilst the consultation recognises that there is some uncertainty with Government policy due to consultation on proposed changes to the calculation of the Standard Method (paras 5.4 – 5.5), it is appropriate for Medway Council to proceed with the current methodology for calculating housing need until such time as there are changes to National planning policy.
- 3.15 We welcome that a comprehensive evidence base is being prepared to inform the new Plan (para. 5.6). In terms of the housing evidence base, this should ensure that it tests the standard method requirement with an appropriate buffer as well as reviewing whether Medway could potentially accommodate Gravesham's unmet housing needs.

iv) Urban Regeneration

- 3.16 The consultation identifies four broad categories of locations where development could take place including urban regeneration; suburban growth, rural development and Green Belt loss (para. 5.16). We consider that the development strategy for Medway should look at a combination of the aforementioned locations. Urban regeneration has been a key development strategy over recent decades, transforming Medway's urban centres and waterfronts and we recognise that this will continue to form an important part of Medway's growth over the next Plan period. However, we consider that the overall development approach will need to be multi-faceted taking into consideration the unique characteristics, constraints and opportunities presented by the diverse nature of Medway's towns and rural areas.
- 3.17 The consultation recognises the key issues and constraints for urban regeneration. Para. 5.26 notes that the development costs typically associated with urban regeneration schemes could mean that they are not as viable as greenfield sites. It should also be recognised that issues with the viability of urban regeneration schemes can have a subsequent impact upon the provision of policy compliant affordable housing. Additionally, urban regeneration sites can take longer to deliver due to factors such as abnormal costs, demolition of buildings and land remediation. Urban regeneration schemes are also more likely to deliver a greater proportion of flatted development and it is clear that Medway will need to plan for a range of dwellings types, including larger homes based on the housing needs of Medway's communities, as identified in the first objective under the 'supporting people to lead healthy lives and strengthening our communities' heading. With this in mind, Medway Council should ensure that all broad location categories

are explored including rural development of greenfield sites and release of land from the Green Belt to deliver Medway's housing development needs over the plan period.

v) Green Belt Release

3.18 We would support a review of the Green Belt boundary to assess the development potential of land that does not meet the five purposes of the Green Belt as set out in the NPPF. This is especially in the light of the required housing numbers.

3.19 The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. There are five key purposes of the Green Belt, including:-

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

(Para. 138)

3.20 The NPPF at para. 139 considers that LPAs with Green Belts in their area should establish Green Belt boundaries in their Local Plans, setting the framework for Green Belt and settlement policy. It is recognised that Green Belt boundaries that have been established should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. LPAs should take a long-term view of the permanence of Green Belt boundaries beyond the plan period.

(Para. 140)

3.21 The NPPF at para. 142 states that LPAs should take into account the need to promote sustainable patterns of development when reviewing Green Belt boundaries. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Inappropriate development within the Green Belt is considered harmful and should not be approved except in very special circumstances. This includes the construction of buildings unless they meet certain criteria which do not have a harmful impact on the openness of the Green Belt.

(Paras. 147 – 151)

3.22 We note that taking into account an existing pipeline of 7,500 homes not yet built, alongside potential delivery through 'windfall' sites that the Council is assessing options to make provision for site allocations

for over 19,000 homes to meet needs in Medway (para 5.13 and Figure 2). Moreover, it is clear from Table 1 'Potential sources of housing land supply by category' that to achieve these needs housing supply will be required from a range of the categories identified within the Table. To this extent, we note that Table 1 identifies that supply from Green Belt loss could amount to 2,649 as identified in the Land Availability Assessment (LAA) (October 2023).

3.23 Given the extent of Medway Council's high level of housing need, alongside the potential supply from the 'Green Belt loss' sites identified, the Council should consider whether exceptional circumstances exist to justify release of land from the Green Belt. We would support the release of land from the Green Belt in locations where it is not meeting the purposes of the Green Belt as set out within the NPPF, to accommodate sustainable growth as part of the overarching strategy for development over the Plan period.

3.24 To this extent, we note that the Medway Green Belt Review identified the Site as part of the larger Land Parcel no. 5, and considered Land Parcel no. 5 to make a 'High contribution' to the purposes and aims of the Green Belt. However, the site forms only a small part of Land Parcel no. 5, and Redrow Homes has previously submitted 'Landscape and Visual Appraisals and Green Belt Reviews' (February 2016 and updated in June 2018) (Appendix 2) as part of representations to Medway Council's Local Plan Issues and Options consultation (2016) and Development Strategy consultation (2018) to promote the Site through the previous Local Plan consultation, and which has undertaken a more granular analysis of the Site's landscape sensitivity and contribution to the Green Belt purposes and concluded in summary that:

- Overall, the Site is considered to be of low sensitivity, as it is of low landscape value and it has a very localised visual envelope to the north, west and south due to the surrounding landform and landcover (vegetation and built form). Moreover, that whilst the visual envelope to the east is more extended, the Site interior is only partially visible from certain locations, and where visible it is seen in conjunction with the adjacent existing residential and industrial development. It identifies that the visual character is one of a semi-developed, urbanised landscape. (Para. 5.15)
- In reviewing the function of the Site against the Green Belt purposes as set out in the NPPF, it identified that the Site:
 - Makes **no contribution** to checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns;
 - Makes a **limited contribution** to assisting in safeguarding the countryside from encroachment; and
 - **Would not prejudice** derelict land coming forward in future for development." (Para. 8.8).
- The report concludes that sympathetic development within the Site would be acceptable in landscape and visual terms and would result in limited to no effect on the function of the Green Belt. (Para. 8.8)

-
- 3.25 We therefore consider that there is opportunity for minor and localised release of the Site from the Green Belt.
- 3.26 We understand that the evidence base to support the draft Local Plan will include updated Landscape Character Assessments, and we consider that it is appropriate that the previous Green Belt Review document is also updated to provide an up to date and more granular analysis in its approach, as this will be important in assessing whether the Green Belt locations still serve the purposes of the Green Belt.

4.0 SITE SUITABILITY

- 4.1 The Site is located within a sustainable location, adjacent to the St. Andrew's Park development which has delivered a range of infrastructure and services. The Site is accessible, located adjacent to the local road network with access proposed directly onto the A228 and served by local bus routes. Furthermore, the Site is in close proximity to the strategic highway network and railway with the M2 located approximately 1 mile to the north of the Site and Halling railway station approximately 850 metres to the south of the Site. Pedestrian access to the railway station will be via the pedestrian footbridge, delivered as part of the St. Andrew's Park development.
- 4.2 The release of this Site from the Green Belt and its allocation for residential development has the potential to meet the three elements of sustainable development, as set out in the NPPF (para 8) in the following ways:
- A social role: by delivering housing that is of a suitable mix and quality including affordable to meet the need;
 - An economic role: in bringing forward employment opportunities during the construction phases, increase in labour force to the area, additional expenditure to the local economy by future residents and New Homes Bonus; and
 - An environmental role: in being well located to existing facilities and services as well as public transport routes. The Site could also be developed in a way that includes the provision of a green wedge to its northern part, which would help to maintain a separation between the settlement boundaries of Halling and North Halling and enable further ecological and green infrastructure enhancements. (see Appendix 1 – Site Location plan).
- 4.3 Furthermore, the development would help to enhance and maintain the vitality of the rural community of Halling, in line with Paragraph 79 of the NPPF. Overall, we consider that the release of the Site from the Green Belt would entail a very limited reduction to the overall extent of the Green Belt and only a minor change to the Green Belt boundary.
- 4.4 As confirmed in the Call for Sites submission, the Site is '**deliverable**'. This is because the Site is '**available**' as it is in single ownership and is being promoted for residential development. Moreover, the Site is '**achievable**' as it can be delivered in the first 5 years of the Plan period and there are no overriding technical constraints to its delivery.

5.0 CONCLUSIONS

- 5.1 These representations are submitted on behalf of Redrow Homes who has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 5.2 These representations focus on promoting Redrow Homes' site known as 'The North Field, Halling'. The Site forms part of the wider St. Andrew's Park Development which is currently being built out by Redrow Homes. The Site currently lies within the Green Belt.
- 5.3 We support the overarching vision of the Local Plan and welcome that the development strategy is reviewing all possible options to accommodate the growth planned for Medway over the Plan period.
- 5.4 With regard to the level of housing need identified, we do not consider that it takes into account an appropriate 5% buffer to the housing figure and the potential for a 10% or 20% buffer as set out within the NPPF to take into account previous shortfalls and the potential for accommodating unmet needs from Gravesham. This should be reviewed before the next iteration of the Local Plan is published. The Plan should ensure that enough housing sites are allocated to achieve a Plan that is deliverable.
- 5.5 Given the extent of Medway Council's high level of housing need, alongside the potential supply from the 'Green Belt loss' sites identified, the Council should consider the existence of exceptional circumstances to justify release of land from the Green Belt. We consider that a strategy for Green Belt release should be carefully reviewed by the Council to establish the extent of opportunity for sites located within the Green Belt to contribute towards Medway's housing needs over the Plan period. This should include an update to the previous Green Belt Review which was published in 2018 and more granular analysis of Green Belt sites to ensure that the strategy is positively prepared.
- 5.7 We consider the site is suitable to be released from the Green Belt under a localised Green Belt review in this location. We have identified that the release of this Site from the Green Belt would not cause any significant harm to Green Belt purposes and serve to rationalise the Green Belt boundary. The Site would form a logical extension to the development at St. Andrew's Park and would maintain separation between Halling and North Halling. Furthermore, development in this location would serve to deliver houses in this rural part of Medway.

Appendix 1 - Site Location Plan



NOTES

These drawings are prepared for the purpose of Land Agency Planning Approval only in all other circumstances DO NOT rely on this drawing. Please contact the office for any additional information required.


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REV	DESCRIPTION	DATE	AUTHOR	CHECKED
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- KEY**
- Site boundary
 - Land also owned by applicant
 - Location of residential development
 - Site access
 - Proposed planting
 - Existing trees



TETLOW KING
ARCHITECTS - URBAN DESIGNERS - SUSTAINABILITY CONSULTANTS
Building: Tel: 01794 511333 Fax: 01794 511337 Web: www.tetlowking.co.uk

PROJECT
Former Cemex Site - North Field
Halling, Kent
For: Redrow Homes South East

DRAWING
Location Plan - 01

SCALE	DATE	AUTHOR	CHECKED
1:1250 @ A2	02/04/14	RE/AR RB	

JOB NO.	DRAWING NO.	REV
REDR131007	LP-01	-

Appendix 2 - Landscape Appriasal and Green Belt Review (April 2018)

The North Field, Halling: Landscape Appraisal and Green Belt Review

Prepared on behalf of Redrow Homes Ltd

June 2018

The North Field, Halling: Landscape Appraisal and Green Belt Review

Prepared on behalf of Redrow Homes Ltd

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Prepared by:	David Hope
Checked by:	Greg Mahon
Authorised by:	Matthew Chard

Barton Willmore LLP
7 Soho Square
London
W1D 3QB

Tel: [REDACTED]
Fax: [REDACTED]
Email: [REDACTED]

Ref: 23486/A5
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1.0 INTRODUCTION

- 1.1 Barton Willmore Landscape Planning and Design (BWLPD) was commissioned by Redrow Homes Ltd to undertake a Landscape and Visual Appraisal and Green Belt Review (LVA GBR) of the land adjoining North Halling, west of the A228 Formby Road / Rochester Road, with the purpose of identifying its suitability for residential development and release from the Green Belt.
- 1.2 The land being considered for release from the Green Belt and residential development is referred to as the 'Site'. The location and extent of the Site is illustrated within **Figure 1: Site Context Plan** and **Figure 2: Aerial Plan of Site**.
- 1.3 This report details the landscape character, landscape value and visual envelope of the Site, and provides an assessment of the contribution that the Site makes towards the purposes and function of the Green Belt, as set out in Paragraph 80 of the National Planning Policy Framework (NPPF).
- 1.4 The objectives of this study are to:
- Assess the landscape characteristics and quality of the Site and its surrounding and function within the landscape;
 - Assess the visibility of the Site and the nature and quality of the existing views from the surrounding area;
 - Consider the policy basis for the Green Belt designation that applies to the area;
 - Assess the contribution of the Site in response to its Green Belt function and its potential to be released from the Green Belt; and
 - Identify opportunities and constraints to development on the Site, from a landscape and visual perspective.
- 1.5 Supporting illustrative information is presented in the following plans and photographs:
- Figure 1: Site Context Plan;
 - Figure 2: Aerial Plan of Site;
 - Figure 3: Topography Plan;
 - Site Appraisal Photographs A - C; and
 - Site Context Photographs 1 - 11.

Previous Work

- 1.6 A previous Landscape and Visual Appraisal and Green Belt Review was undertaken for the Site by BWLPD in February 2016, which concluded that the Site could successfully accommodate residential development with limited to no effect on the Green Belt. The findings of this LVA

GBR (as presented below) largely align with the findings of the previous work, albeit using an updated version of the Green Belt methodology that aligns with current best practice.

2.0 METHODOLOGY

- 2.1 Landscape and Visual Appraisal (LVA) and Green Belt Review (GBR) are separate assessments. However, the information ascertained through the LVA is used to aid the assessment of the contribution that the Site makes towards the purposes of the Green Belt, including through the assessment of the relationship of the Site with the existing built form; the identification of defensible boundaries that may prevent sprawl; the physical and visual encroachment into the countryside; and the physical and visual merging of settlements.

Methodology for Landscape and Visual Appraisal

- 2.2 The LVA has been prepared with reference to the Guidelines for Landscape and Visual Impact Assessment 3rd Edition, prepared by the Landscape Institute and the Institute of Environmental Management and Assessment ¹.
- 2.3 A desktop review of the study area was undertaken to identify landform, landscape features, landscape designations and relevant landscape policy, and to review published landscape character information. This information was used as the initial basis against which to appraise the Site. A visit to the Site and surroundings was subsequently undertaken in April 2018 to verify the desk-based review and add further information to the landscape and visual context of the Site.
- 2.4 A description of the existing land use of the study area is provided and includes reference to existing areas of settlement, transport routes and vegetation cover, as well as local landscape designations, elements of cultural and heritage value, and any local landmarks or tourist destinations. These factors combine to provide an understanding of landscape value and sensitivity and provide an indication of particular key views and viewpoints that are available to visual receptors.
- 2.5 To determine the extent of visual influence, a visual appraisal of the Site was undertaken to consider the nature of existing views from publicly accessible viewpoints including roads, Public Rights of Way (PRoW) and public open spaces. Consideration was given to private views, however access to private properties was not obtained. Views were considered from all directions and from a range of distances. The viewpoints chosen are not intended to be exhaustive, but rather to represent the potential views obtained towards the Site in order to identify areas of higher visual sensitivity.

¹ Institute for Environmental Management and Assessment and the Landscape Institute (2013) Guidelines for Landscape and Visual Impact Assessment 3rd Edition

2.6 The inherent sensitivity of the Site is considered in terms of the following:

- **Landscape Character:** i.e. landform, vegetation cover, land use, scale, state of repair of individual elements, representation of typological character, enclosure pattern, form/line and movement;
- **Landscape Value:** i.e. national designations, local designations, sense of tranquillity/remoteness, scenic beauty and cultural associations; and
- **Visual Influence:** i.e. landform influences, tree and woodland cover, numbers and types of residents, numbers and types of visitors and scope for mitigating potential for visual impacts.

2.7 A more detailed landscape appraisal of the Site was then undertaken, which in combination with the wider visual appraisal, assists in the identification of opportunities and constraints that would assist in defining the boundaries for potential future development, and thus an amended Green Belt boundary.

Methodology for Green Belt Review

Assessment against the purposes of the Green Belt

2.8 The Site was assessed against the first four purposes of the Green Belt as set out in Paragraph 80 of the NPPF, which are:

- ***"To check the unrestricted sprawl of large built-up areas;***
- ***To prevent neighbouring towns from merging in to one another;***
- ***To assist in safeguarding the countryside from encroachment; and***
- ***To preserve the setting and special character of historic towns.***

2.9 The fifth purpose of the Green Belt ***"to assist in urban regeneration by encouraging the recycling of derelict and other urban land"*** is not a landscape and visual consideration. Should the Site be brought forward for redevelopment, this would not prejudice derelict, or other urban land, coming forward in the future. The principle of retaining land within the Green Belt holds true for all areas within the Green Belt, therefore the Site is considered to make the same contribution to this purpose of the Green Belt as any other land parcel within the Green Belt. Accordingly, no additional specific assessment is undertaken.

2.10 The NPPF states in Paragraph 83 that ***"once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan"***.

- 2.11 The NPPF seeks to align Green Belt boundary reviews with sustainable patterns of development, as set out in Paragraph 84, with Local Planning Authorities encouraged to ***"consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary"***.
- 2.12 In this regard, where a given area of land contributes poorly towards meeting the purposes of the Green Belt and its release would contribute positively to promoting a sustainable development pattern, this may be considered to impact towards 'exceptional circumstances' and the Green Belt boundary should be reviewed accordingly. The criteria used within this LVA GBR to assess the contribution made to the first four purposes of the Green Belt is set out in Table 2.1 below.

Table 2.1: Purposes of the Green Belt – Assessment Criteria

Purpose	Criteria
Check the unrestricted sprawl of large built-up areas	<p>Considerable - Development of the land would be strongly perceived as sprawl, as it is not contained by robust physical features and/or would extend the settlement pattern in an incoherent manner.</p> <p>Some - Development of the land would be perceived as sprawl, as it is partially contained by robust physical features and/or would extend the settlement pattern in a moderately incoherent manner.</p> <p>Limited - Development of the land would be perceived as sprawl to a limited degree, as it is largely contained by robust physical features and/or would extend the settlement pattern in a broadly coherent manner.</p> <p>None - Development of the land would not be perceived as sprawl as it is well contained by robust physical features and/or is entirely set within the existing coherent settlement pattern.</p>
Prevent neighbouring towns from merging	<p>Considerable - Development would result in the physical unification of two (or more) towns.</p> <p>Some - Development would substantially reduce the physical or perceived separation between towns.</p> <p>Limited - Development would result in a limited reduction in the physical or perceived separation between towns.</p> <p>None - Development would not physically or perceptually reduce the separation between towns.</p>
Assist in safeguarding the countryside from encroachment	<p>Considerable: No built or engineered forms present and perceived as inherently undeveloped and/or rural in character. Development would potentially result in a strong urbanising influence over the wider landscape.</p> <p>Some: Built or engineered forms present but retaining a perception of being predominantly undeveloped and/or rural in character. Development would potentially result in a moderate urbanising influence over the wider landscape.</p> <p>Limited: Built or engineered forms present and a minimal perception of being undeveloped and or rural in character. Development would potentially result in a limited urbanising influence over the wider landscape.</p> <p>None: Built or engineered forms present and perceived as inherently developed and/or urban in character. Development would not result in urbanising influence over the wider landscape.</p>

Purpose	Criteria
Preserve the setting and special character of historic towns	<p>Considerable: Strong physical and/or visual and/or character connection with the historic part of a town. May be within or adjoining the historic part of a town.</p> <p>Some: Partial physical and/or visual and/or character connection with the historic part of a town, whilst not adjacent to it.</p> <p>Limited: weak physical and/or visual and/or character connection with the historic part of a town.</p> <p>None: No physical and/or visual and/or character connection with the historic part of a town.</p>

Assessment against the characteristics of the Green Belt

- 2.13 The NPPF states that the key characteristics of the Green Belt are "***their openness and their permanence***". In defining new boundaries to the Green Belt, it must be ensured that these characteristics are not diminished for the areas remaining within the Green Belt designation as a direct result of development. An assessment is made of the openness of the Green Belt in the vicinity of the Site and to what extent the Sites' removal could have on the perception of openness in the remaining designated area.
- 2.14 In addition, the relationship of the Site to existing elements and visual barriers, such as ridgelines, roads and areas of notable vegetation is demonstrated. This assists in the assessment of impact of potential development upon the openness of the remaining designated area and assists in the identification of boundaries that may be considered to be 'permanent'.
- 2.15 Table 2.2 below provides a glossary of the terms used in relation to the Green Belt assessment.

Table 2.2: Definitions

Term	Definition
Brownfield	(see <i>Previously Developed Land</i>)
Character	A distinct, recognisable and consistent pattern of elements in the landscape that differentiates one area from another.
Coalescence	The physical or visual linkage of large built-up areas.
Countryside	In planning terms: land outwith the settlement boundary; and/or, In broader terms: the landscape of a rural area.
Defensible Boundary	A physical feature that is readily recognisable and likely to be permanent. The NPPF states that " local authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent ". With regard to physical barriers, these would include roads, railway lines, large woodland or significant topographical features.
Encroachment	Advancement of a large built-up area beyond the limits of the existing built-up area into an area perceived as countryside.

Term	Definition
Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Greenfield	Land (or a defined site) usually farmland, that has not previously been developed.
Large built-up area	An area that corresponds to the settlements identified in the relevant Local Plan, including those inset from the Green Belt.
Merging	(see <i>Coalescence</i>)
Neighbouring Town	Refers to settlements identified within the relevant Local Plan and those within the neighbouring authorities' administrative boundary that abut the Green Belt.
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Openness	Openness is taken to be the degree to which an area is primarily unaffected by built features, in combination with the consideration of the visual perception of built features. In order to be a robust assessment, this should be considered from first principles, i.e. acknowledging existing structures that occur physically and visually within the area, rather than seeing them as being 'washed over' by the existing Green Belt designation.
Previously Developed Land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private gardens, parks, recreation grounds and allotments and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.
Sprawl	The outward spread of a large built-up area in an incoherent, sporadic, dispersed or irregular way.

3.0 RELEVANT PLANNING POLICY

National Policy

- 3.1 The NPPF promotes a presumption in favour of sustainable development, defined as ***"meeting the needs of the present without compromising the ability of future generations to meet their own needs"***, and providing it is in accordance with the relevant up-to-date Local Plan, and policies set out in the NPPF including those identifying restrictions with regard to designated areas.
- 3.2 The NPPF states that ***"the purpose of the planning system is to contribute to the achievement of sustainable development"*** and that there are ***"three dimensions to sustainable development: economic, social and environmental"***. The role the environment plays is described as ***"contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use of natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy"***.
- 3.3 Twelve Core Planning Principles are set out, of which the following are relevant to the consideration of landscape and visual matters, stating that planning should:
- ***"not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;***
 - ***always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;***
 - ***take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;***
 - ***contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; and***
 - ***conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations."***
- 3.4 Section 7 of the NPPF provides guidance on ensuring the delivery of good design. The NPPF requires development proposals to respond to local character and be visually attractive, as well as emphasising the need to integrate development proposals into the natural environment.

3.5 Paragraph 58 of the NPPF states that planning policies and decisions should aim to ensure that developments:

- ***"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;***
- ***establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;***
- ***optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;***
- ***respond to local character and history and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;***
- ***create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and***
- ***are visually attractive as a result of good architecture and appropriate landscaping".***

3.6 Paragraph 61 of the NPPF states that:

"...planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment."

3.7 Section 9 of the NPPF relates to the protection of Green Belt land, with Paragraph 79 noting that ***"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open"***. Paragraph 80 of the NPPF sets out the five purposes of the Green Belt, which are replicated in Paragraphs 2.8 - 2.9 of this report.

3.8 Paragraph 83 considers alterations to the designated Green Belt boundary, stating:

"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 in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their permanence in the long term, so that they should be capable of enduring beyond the plan period."

3.9 This is supported by Paragraph 85 of the NPPF that states with regard to defining boundaries that local planning authorities should ***"not include land which it is unnecessary to keep permanently open"*** and to ***"define boundaries clearly, using physical features that are readily recognisable and likely to be permanent"***.

- 3.10 Furthermore, Paragraph 85 notes that local planning authorities should **"satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period"** and **"where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period"**.
- 3.11 With respect to the natural environment, Paragraphs 109 - 125 of the NPPF focus on the conservation and enhancement of the local and natural environment. The NPPF states that the planning system should contribute to and enhance the local environment by inter-alia **"protecting and enhancing valued landscapes, geological conservation interests and soils"**.
- 3.12 Paragraph 110 of the NPPF sets out that the aim in preparing plans for development should be to minimise adverse effects on the local and natural environment, and that plans should allocate land with the least environmental or amenity value.
- 3.13 Paragraph 114 notes that furthermore, Local Planning Authorities should:

"set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure."

Local Policy

- 3.14 The Local Plan for Medway currently covers Development Plan policies from a number of plans, including the Medway Local Plan 2003.

Medway Local Plan 2003

- 3.15 The Medway Local Plan 2003 was adopted on 14 May 2003. The following saved policies are relevant:

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."

Policy BNE1: General Principles for Built Development

"The design of development ... 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..."

Policy BNE6: Landscape Design

"Major developments should include a structural landscaping scheme to enhance the character of the locality... Detailed landscape schemes ... should have regard to the following factors: ...(ii) include planting of a size, scale and form appropriate to the location and landform ... (iv) retain important existing landscape features, including trees and hedgerows"

Saved 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..."

- 3.16 Policy BNE25 defines countryside as **"...that land outside the urban and rural settlement boundaries defined on the proposals map"**. Based on this the Site falls within land classified as countryside.

Saved Policy BNE 30 Metropolitan Green Belt

- 3.17 The Site is located within the Green Belt. The preamble to saved Policy BNE 30 states that:

"In Kent, the Metropolitan Green Belt has helped to preserve the open countryside between the edge of Greater London and the urban areas of Medway, Maidstone, Tunbridge Wells, Sevenoaks and Tonbridge. At a more local level, it has helped maintain the open area between Medway and Gravesend."

- 3.18 Under National Planning Policy Framework (2012) , Green Belt is a functional designation, its purpose being to prevent urban sprawl by keeping land permanently open and as such the essential characteristics of Green Belts are their openness and permanence. Refer to Section 2 'Methodology' and Section 7 'Green Belt Review' for further details.

- 3.19 Policy BNE30 states:

"Within the Metropolitan Green Belt, as defined on the proposals map, there is a general presumption against inappropriate development. Development will not be permitted unless the following objectives are fulfilled:

- i) it is designed and sited so that the open character of the area is maintained; and*
- ii) it accords with the purposes of including land in the Green Belt.*
- iii) new buildings will only be permitted for the following purposes:*
 - a) agriculture or forestry; or*
 - b) essential small scale facilities for outdoor sport or recreation, for cemeteries or other land uses that fulfil the above objectives; or*
 - c) a limited extension, alteration or replacement of an existing building; or*
 - d) limited infilling within the village boundary of Upper Halling..."*

Saved Policy BNE 31: Strategic Gap

- 3.20 To the east of the Site (east of the A228) is land designated as Strategic Gap. The aim of this policy is, amongst other things, to prevent development that would result in the degradation of the open character or separating function of the land specifically included within the Strategic Gap. Due to the fact that the Site is not within the Strategic Gap, development on the Site would not affect the ability of land within the Strategic Gap to fulfil its function.

Policy BNE32: Areas of Outstanding Natural Beauty

"Development within the Kent Downs Area of Outstanding Natural Beauty ... will only be permitted when it conserves the natural beauty, wildlife and cultural heritage of the area.

Major development will only be permitted in exceptional circumstances and will be considered against the following criteria:- (iv) Any detrimental impact on the environment or landscape, (v) The environmental standard of the proposed construction or restoration."

- 3.21 The Kent Downs Area of Outstanding Natural Beauty extends east-west across Kent, however, the River Medway and the urbanised land to the west of the River Medway (which includes Halling and the Site) are excluded from the designated area.

Policy BNE33: Special Landscape Areas

Development within the North Downs ... special landscape areas, ... 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*

a)

Saved 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."

- 3.22 The Site is not within or adjoined by an Area of Local Landscape Importance as identified within the Medway Local Plan 2003. However, one is located at Halling Common approximately 600m to the south and one at Cuxton Brickfields approximately 1.3km to the north-east.

Policy BNE42: Hedgerow Retention

"Important hedgerows will be retained and protected."

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."

Saved Policy H11: Residential Development in Rural Settlements

"Unless the site is allocated for housing development in the local plan, or an exceptional justification can be made, housing development in the rural area will be restricted to minor development within the confines of the following villages and settlements: ... (viii) Halling ... (xiii) North Halling, (xiv) Upper Halling..."

Emerging Local Plan

- 3.23 Medway Council are currently working on a new Local Plan which will replace the 'saved policies' of the 2003 Medway Local Plan and cover the period up to 2035. Consultation on a Development Strategy technical document is ongoing until 11th May 2018. The Development Strategy technical document sets out the ambitions for the plan and provides options for how the area could grow and draft policies for managing development. The following draft policies are relevant:

Emerging Policy DS2: Spatial Development Strategy

"... The council will consider a lesser scale of development in defined sites in suburban locations around ... the villages of High Halstow, Lower Stoke, Allhallows, Grain and Halling, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided".

Emerging Policy NE3: Kent Downs Area of Outstanding Natural Beauty

"Development proposals in the Kent Downs AONB and in the setting of the downs will be required to contribute to the conservation and enhancement of the natural beauty of this designated landscape.

Development must demonstrate that it has have regard to the Kent Downs Management Plan and associated policy guidance."

Emerging Policy N4: Landscape

"The council attaches great importance to the distinctiveness and quality of landscape in defining Medway's character, containing urban sprawl and separation of settlements.

An updated Medway Landscape Character Assessment and Green Infrastructure Framework will provide a basis for determining the acceptability of development proposals and areas and features that need to be protected and enhanced.

Development proposals will be required to demonstrate that they protect, strengthen and connect features of local landscapes."

Emerging Policy NE6: Green Belt

"The council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.

The council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function."

3.24 The preamble to Emerging Policy NE6 states:

"... Given the scale of growth projected in Medway's population, the council is giving broad consideration to all realistic options at this stage of the plan preparation. This includes testing if the exceptional circumstances exist that would justify a revision to the Green Belt boundary in Medway.

Should the council determine that there are no such exceptional circumstances to support the release of Green Belt land, it will adhere to its policy that development will be restricted in this location, in line with national policy to ensure that the land remains permanently open."

Emerging Policy BE1: Promoting High Quality Design

"Development in Medway will be expected to be of high quality design that makes a positive contribution and respond appropriately to the character and appearance of its surroundings.

Proposals that incorporate high quality design and sustainability which demonstrably consider the following criteria will be permitted: The scale and form of development is appropriate to its surrounding context and is characteristic of Medway, or where appropriate new high quality character; ... How the proposal relates to and/or reinforces the local distinctiveness and character through the use of high quality materials and local vernacular materials where appropriate; landscaping and building detailing; Working with the topography of the site and the incorporation of existing natural features; Responds appropriately to the character of the area, interprets respectfully ... views into and out of the site; ... High quality landscaping ...that make use of or retaining features considered relevant/important; Achieves a transition from urban to rural where appropriate..."

Emerging Policy BE3: Housing Design

"All new accommodation must... Be designed with a clear and particular attitude to place-making and distinctiveness within their context."

Supplementary Planning Documents

Medway Strategic Land Availability Assessment, 2017

- 3.25 Medway's Strategic Land Availability Assessment (SLAA) collates information regarding the availability of potential development sites and forms part of the evidence base for the new Local Plan. The Site is included within the SLAA as development site '0352 - North Field Old Cement Works, Formby Road / Rochester Road, Halling' and is shown on Map 12 of the SLAA.

- 3.26 The SLAA does not allocate development sites nor grant planning permission, but considers if land is 'suitable' for development, 'available' and 'deliverable'. The suitability of the various sites is assessed on a number of criteria, including inter alia: ecological potential, landscape & environment, and residential amenity.
- 3.27 Table 5 of the SLAA lists the Site as being not suitable for development. However, the document does not detail the specific criteria on which the Site was deemed to be unsuitable. The suitability matrix on pages 10-17 states that under the landscape and environment criteria a site would be unsuitable if it **"falls within a landscape of either or both of high sensitivity and good condition in the Medway LCA 2011"**. As detailed within Section 4 below this is not the case for the Site and surrounding landscape, and therefore it is assumed that the Site was deemed unsuitable based on other criteria unrelated to landscape and visual matters.
- 3.28 It should also be noted that the Executive Summary of the SLAA states: **"Whilst the SLAA indicates the Council's initial assessment as to whether a site is free of constraints and likely to come forward for development, it does not allocate development sites or grant planning permission. As such the SLAA does not predetermine the Council's future assessment of sites through the local plan and development management processes"**. The SLAA also goes on to say, **"the assessment and conclusions about sites may be subject to change over time ... constraints may be overcome/mitigated ... and site capacity or densities may change"**.

4.0 SITE CONTEXT

The Site and its location

- 4.1 The Site is located within North Halling in Kent and is adjoined by residential properties on three sides: to the west by properties lining Pilgrims Road / Way; to the south by a recently constructed residential estate known as "St Andrews Park"; and to the north by properties located along the western side of Formby Road / Rochester Road (the A228) and south-eastern side of Pilgrims Road / Way. On its eastern edge the Site is defined by the A228.
- 4.2 The Site is approximately 6.8 hectares (ha) in size and comprises an unmanaged, sloping field. The landform falls consistently from approximately 25m Above Ordnance Datum (AOD) in the west, to approximately 5m AOD in the east. There is a block of woodland in the southern corner, adjoining the A228; a block of woodland in the south-western corner, adjoining Pilgrims Road / Way; dense boundary vegetation along its eastern edge, separating it from the A228; and a linear belt of vegetation along the southern edge of the Site, separating it from St Andrews Park. Pylons and overhead electricity lines extend along the southern boundary of the Site.

Topography and Hydrology

- 4.3 The Site lies at the foot of the western slope of the Lower Medway Valley as illustrated in **Figure 3: Topographical Features Plan**. This is a shallow valley, lying between 0m and 30m AOD, associated with the River Medway. The river flows through the area in a northerly direction from Maidstone in the south to Rochester in the north-east. Beyond Rochester the Medway continues to Sheerness, where it meets the River Thames.

Land Use and Settlement

- 4.4 Land use along the western side of the River Medway, within the vicinity of the Site and Halling, is mixed and includes industrial buildings, marinas, and residential development. Large cement works are a prominent feature near Halling, and a series of pylons and overhead electricity lines are a noticeable feature crossing the valley, including the southern part of the Site. Previous industrial land-use is also evident to the south-west of the Site, where a former chalk pit is now flooded to form a lake (newly-dubbed as 'St Andrews Lakes').
- 4.5 Infrastructure is a dominant land use along the western side of the valley bottom. This includes the A228, the principle road route linking Snodland with Rochester; and the Medway Valley Line railway, which connects Strood with Maidstone. The latter includes two stations within the vicinity of the Site: at Halling to the south and at Cuxton to the north-east. In addition, two bridges span the river: the recently constructed St Peter's Bridge to the south of Halling, and

the Medway Viaduct to the north-east beyond Cuxton. The A228 links a series of settlements along the western side of the valley located between Snodland and Rochester, including (from south to north): Holborough, Halling, North Halling and Cuxton. Later development around these settlements has taken the form of ribbon development along the A228 corridor.

- 4.6 Further west the land rises steeply, with the upper valley sides and ridgeline forming a physical and visual backdrop that is primarily wooded with visible areas of exposed chalk escarpment. The woodland cover in this area is largely defined as Ancient Semi Natural Woodland (ASNW). This land lies within the Kent Downs Area of Outstanding Natural Beauty (AONB), with the Site and the area immediately to south and south-west excluded from the AONB.
- 4.7 Land use on the eastern side of the River Medway is markedly less urbanised. This area comprises primarily agricultural land, with arable land organised into large geometric fields on higher ground and smaller irregular pastoral fields on the river floodplain. Settlement in this area is largely limited to scattered farmsteads, with the only notable settlement at Wouldham on the eastern bank of The Medway River opposite Halling. The agricultural character is heightened by a lack of arterial roads: the landscape here features only minor rural roads, including Wouldham Road and Burnham Road. This land also lies partly within the Kent Downs AONB.
- 4.8 With regards to relevant planning policy and landscape designations, the Site and/or the surroundings are subject to the following:
- The Site is within the Green Belt;
 - The Kent Downs AONB extends east-west across Kent. However, the River Medway and the urbanised land to the west of the River Medway (which includes Halling and the Site) are excluded from the designated area;
 - There are no areas of ASNW within the Site, although much of the woodland that occupies the ridge to the west of the Site is defined as ASNW. This woodland is approximately 100m from the Site at its closest point;
 - The Site is not within or adjoined by an Area of Local Landscape Importance; and
 - There are no listed buildings, Scheduled Monuments or Conservation Areas within the Site or adjoining the Site;
- 4.9 As demonstrated by the above, the Site is located on the lower slopes of the western side of the valley of the River Medway, an area containing a concentration of industrial and urban developments. Whilst the Site is located within the Green Belt, it is surrounded by residential properties on 3 sides (including recent residential development to the south of the Site). With the exception of the Green Belt designation, the Site is not subject to any other planning policy or landscape-related designations.

Published Landscape Character

- 4.10 The landscape character assessment approach is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country. This approach recognises the intrinsic value of all landscapes, not just 'special' landscapes, as contributing factors in people's quality of life, in accordance with the European Landscape Convention. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles.
- 4.11 The description of each landscape is used as a basis for evaluation in order to make judgements to guide, for example, development or landscape management.

National Landscape Character

- 4.12 As part of Natural England's responsibilities in delivering the Natural Environment White Paper, Biodiversity 2020 and the European Landscape Convention, Natural England has developed a series of National Character Area (NCA) profiles. These NCA profiles provide a broad range of information including an outline of the key characteristics of a given area; a description of the ecosystem services provided and how these relate to people, wildlife and the economy; and an array of opportunities for positive environmental change. The extent of NCA profiles is illustrated on **Figure 1: Site Context Plan**.

NCA Profile 119: North Downs

- 4.13 The Site and its immediate surrounding landscape is covered by NCA Profile 119: North Downs, which extends from Guildford to Dover. The key characteristics of NCA Profile 119 of relevance to the Site and surrounding area, are as follows:
- ***"...A distinctive chalk downland ridge rises up from the surrounding land, with a steep scarp slope to the south providing extensive views across Kent, Surrey and Sussex and across the Channel seascape to France;***
 - ***Chalk soils are predominant across the NCA but the upper part of the dip slope is capped by extensive clay-with-flint deposits...;***
 - ***The area is cut by the deep valleys of the Stour, Medway, Darent, Wey and Mole. The river valleys cut through the chalk ridge, providing distinctive local landscapes which contrast with the steep scarp slope;***
 - ***The footslope of the escarpment supports arable cropping, the dominant land use within the NCA. In the east, the richer, loamy soils of the lower dip slope support large tracts of mixed arable and horticultural production;***
 - ***Woodland is found primarily on the steeper slopes of the scarp, valley sides and areas of the dip slope capped with clay-with-flints. Well-wooded hedgerows and shaws are an important component of the field boundaries, contributing***

strongly to a wooded character. Much of the woodland is ancient;

- ***Ancient paths, drove roads and trackways, often sunken, cross the landscape and are a distinctive feature of the dip slope. Defensive structures such as castles, hill forts and Second World War installations, and historic parks, buildings and monuments are found throughout; and***
- ***Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern with local flint, chalk and Wealden brick the vernacular materials..."***

4.14 With respect to NCA 119: North Downs, the following Statements of Environmental Opportunity of relevance to the Site are provided:

- ***"SEO 1: Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations;***
- ***SEO 2: Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs recognising their contribution to sense of place, sense of history and tranquillity...; and***
- ***SEO 4: Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness..."***

4.15 Key Landscape Opportunities within NCA Profile 119 identified on page 54 include:

- ***"Protect, conserve and enhance the character of much of the downland landscape devoid of development and urban intrusions, retaining and expanding the remaining areas of tranquillity...;***
- ***Manage, conserve, enhance and restore the characteristic pattern of thick well-treed hedgerows and shaws, forming a predominantly irregular field pattern...***
- ***...tackle the challenges associated with urban fringe pressures on the North Downs...learning from landscape scale projects which have successfully driven forward improvements in the urban fringe environment and strengthened local landscape character..."***

County Landscape Character

4.16 The Landscape Assessment of Kent was prepared by Jacobs Babbie on behalf of Kent County Council and was published in October 2004. The Landscape Assessment of Kent identifies a number of different Landscape Character Areas (LCAs) across Kent, and provides a description of and vision for each LCA.

4.17 The Site lies within the Kent Downs – Medway, Western and Eastern Scarp LCA, which is characterised by:

- ***"Gently undulating arable farmland;***
- ***Sparse, remnant hedges leading up to wooded ridges;***
- ***Open and wild character on eastern slopes with wide views;***
and
- ***Quarries."***

4.18 The LCA is described as a generally incoherent landscape of very poor condition in which features do not reflect or enhance the landform. It is also noted that there are many visual detractors, including quarry faces and ridge-line housing. Built development is described as being ***"...frequent in views and of having a high negative impact"***.

4.19 The Medway Valley is described as having ***"a significant landform as a whole"***, however, the lower slopes of the western and eastern scarp are described as ***"unremarkable when considered in isolation"***. The LCA describes the landscape as ***"open with moderate visibility"***, and states that hedged field boundaries and woodland are limited. With regard to the sensitivity of the landscape, the LCA describes this as low.

4.20 The Landscape Actions described within the LCA include: the creation of enclosure for urban areas using characteristic woodland; the creation of a landscape framework to provide an urban edge and peripheral enclosure to arable fields and other farmland; and the creation of shaws or wide hedgerows as enclosure and to provide a network of semi-natural habitats. In relation to open areas, the LCA highlights the importance of maintaining space between urban development and the waterfront of the river.

Local Landscape Character

4.21 The Medway Borough Council's Landscape Character Assessment was prepared in 2011. The Site and the surrounding landscape in the vicinity falls within Landscape Character Area 39: Halling Quarries. The Landscape Type of this LCA is identified as Rural Fringe, and of sub-type Rural fringe with urban/industrial influences. The key characteristics of LCA 39: Halling Quarries are identified as follows:

- ***"Scarp floor with rolling arable fields, interspersed with small settlements, disused quarries, industrial heritage and Peter's Pit development infrastructure works;***
- ***Heavily wooded disused pits fragment character but screen visual interruption;***
- ***Blue Lake to south west of Halling Cement Works forms distinctive landscape feature; overhead pylons and cement works are detracting features; and***
- ***Southern part of character area extends into Tonbridge and Malling"***

- 4.22 The LCA is described as being of moderate condition, with a variable pattern of elements, having some detracting features and an interrupted visual unity. The LCA is described as having a moderate sensitivity.
- 4.23 'Issues' identified on page 105 include the new development proposals for the Halling Cement Works and infrastructure works associated with Peter's Pit development (south of the Site), and loss of rural character from new developments and urban fringe intrusions/activities.
- 4.24 'Guidance' includes: ensuring the use of appropriate native planting to screen new development from footpaths, roads, existing settlements and rural areas; and ensuring that new development proposals respect the rural character of the area and criteria associated with Green Belt designation.
- 4.25 Since the LCA was published the St Andrews Park housing development has been constructed within LCA 39 immediately to the south of the Site, which represents a change to the character area. This residential development is therefore not reflected within LCA 39 character description, although the 'General Notes' section of the LCA does reflect that the removal of cement works and new development on the site will alter the character of the area from predominantly industrial to residential.

Contribution of the Site to Landscape Character

- 4.26 The Site is generally reflective of the wider landscape character of the Lower Medway Valley, being rural-fringe in character and influenced by urban/industrial development nearby, including residential development immediately adjacent on three sides and electricity pylons crossing the Site's southern edge. The woodland to the south and south-west of the Site, and the boundary vegetation along the southern and eastern edges, are elements that are generally characteristic of the more well-wooded areas of the escarpment to the west, and these should be retained and enhanced as part of any development of the Site in accordance with the published guidelines.

5.0 LANDSCAPE AND VISUAL APPRAISAL

Overview

- 5.1 The Site and the surrounding environment was visited in April 2018, with **Site Appraisal Photographs A - C** illustrating the existing character of the Site. The locations from which the Site Appraisal Photographs were taken are shown on **Figure 2: Aerial Plan of Site**. The visual context of the Site is illustrated by **Site Context Photographs 1 - 11**, the locations of which are illustrated on **Figure 1: Site Context Plan**.

Landscape Appraisal

- 5.2 A landscape appraisal has been undertaken to ascertain the existing character of the Site. This is accomplished through recording and analysing the existing landscape features and characteristics, the way the landscape is experienced, and the value or importance of the landscape and visual resources in the vicinity of the Site. The elements of the landscape that contribute to landscape character include the built and natural form, the pattern of features, detailing, scale, planting, land use and human perception. In this regard, landscape character is derived as a result of the perception of, and action and interaction of, natural and human factors.
- 5.3 As illustrated in **Site Appraisal Photograph B** and **Site Appraisal Photograph C** the Site is comprised of an unmanaged field sloping west to east (from approximately 25m AOD to approximately 5m AOD). The Site is adjoined by residential properties on three sides (to the north, west and south), which is generally apparent from within the Site. The Site is clearly defined by the A228 to the east, beyond which lies the Medway Valley Line railway. These busy communication routes are generally perceptible from within the Site, being intervisible from the higher ground in the west.
- 5.4 Woodland blocks lie in the southern and south-western corners of the Site; a dense hedgerow extends along the Site's western edge; and a linear belt of trees lines its southern boundary. **Site Appraisal Photograph A** shows the well-wooded setting of the Site to the south-west, and the resulting sense of enclosure here. However, despite this there is some intervisibility with the housing development at St Andrews Park to the south. From much of the Site the surrounding vegetation restricts intervisibility with the landscape to the south and south-east. However, industrial development (cement works) to the south-east at Halling, and a series of electricity pylons along the southern edge of the Site remain perceptible above the vegetation in places (as shown in **Site Appraisal Photographs B and C**). These features are prominent infrastructural elements that, along with other surrounding urban/industrial and communications land-uses, have an urbanising influence.

5.5 The Site is considered to be of low landscape value due to the following:

- It is comprised largely of an unmanaged field in relatively poor condition, albeit with some woodland blocks that are generally in a good state of repair and should be retained and enhanced as part of any proposed development in accordance with the published guidelines (see Published Landscape Character above);
- The Site is generally not of noteworthy scenic quality, insofar as it largely comprises a commonplace element - an unmanaged field - adjoined by residential development and a busy A road. The presence of built development and infrastructural elements detracts from the scenic and perceptual qualities of the Site and has an urbanising influence;
- The Site is not particularly remote or tranquil, given its proximity to built developments and the busy road and rail routes immediately to the east;
- The Site does not form part of the historic landscape setting of any heritage assets; and
- Other than PRow RS220 extending along its northern boundary, the Site currently affords no opportunity for public recreation.

Visual Appraisal

5.6 A visual appraisal has been undertaken to determine the relationship of the Site with its surroundings and its approximate extent of visibility within the wider landscape from publicly accessible locations.

5.7 The potential visibility of the Site is largely determined by the intervening landform, as topographic features such as ridgelines and subtle undulations may block or curtail views towards the Site. In addition, land cover has an important role in determining potential visibility; woodland, tree belts or built forms may contribute to additional blocking, filtering or curtailing of views.

5.8 The effectiveness of vegetation as a visual screen depends to a considerable extent on its scale. A large mature feature will form a substantial screen throughout the year, but a hedgerow or intermittent tree belt may only be effective during the summer months when vegetation is in leaf. Whilst small features, such as hedgerows and individual trees can be very important, particularly when their combined effect is taken into account, they cannot be considered to be substantial or wholly effective screening features or visual barriers due to the seasonal nature of their effect.

5.9 **Site Context Photographs 1 – 11** demonstrate that views of the interior of the Site are generally limited to locations in proximity to the Site. From the residential properties immediately adjacent to the Site views are available, although partially filtered by intervening scrub vegetation on the edge of the Site and/or vegetation within gardens. As illustrated in

Site Context Photograph 2 open views are also obtainable from certain points along PRoW RS220, although from other areas views are partially curtailed by vegetation lining the footpath. From other locations in proximity to the Site, views are heavily curtailed by the vegetation and built forms surrounding the Site. The vegetation is mainly mature or semi-mature and provides a robust visual screen, as is evident within **Site Context Photographs 1, 3, and 4**.

- 5.10 Moving away from the Site, views become further restricted by intervening landform and/or land cover. The ridge of higher ground to the west provides a degree of physical and visual containment. Views from the ridge, including from within the Kent Downs AONB, are generally screened by the dense woodland covering. However, more open views are available from the less wooded valley sides as illustrated in **Site Context Photograph 5**. From PRoW RS201 open elevated views are available west across the river and valley bottom. The residential development at St Andrews Park to the south of the Site is visible, beyond which is the River Medway and adjacent industrial land uses. Partial views of the Site are available from this location, with only the woodland and boundary vegetation to the south and south-west of the Site visible. This vegetation visually coalesces with other vegetation in the view meaning the Site's interior is not visible.
- 5.11 From locations to the north and south along the lower valley floor, views generally become curtailed by intervening built forms and vegetation, as demonstrated in **Site Context Photograph 6 and 11**.
- 5.12 Clearer views towards the Site are obtainable from the east, on the opposite side of the River Medway, including from areas within the Kent Downs AONB. Views are available from the lower ground on the eastern side of the river including from PRoW MR1, which follows the opposite bank of the river (as illustrated in **Site Context Photograph 7**); and from Wouldham Road to the south-east (as illustrated in **Site Context Photograph 5**). From these locations the interior of the Site is partially visible although views are filtered through the dense boundary vegetation along the Site's eastern edge in proximity to the A228.
- 5.13 More distant elevated views are also available from the areas of higher ground further to the east, as illustrated in **Site Context Photographs 9 and 10**. From these locations the interior of the Site is partially visible, although again views are filtered through the intervening vegetation along the eastern side of the Site in proximity to the A228.
- 5.14 In views from the east, existing built development is prominent along the lower slopes of the Medway Valley, beyond which the wooded escarpment rises to form a backdrop to the view. The Site is visible from these locations, although seen in context with existing residential development to the west (visible above the Site), north and to the south. Industrial

development at Halling is also readily apparent in views from the east, and the A228 and Medway Valley Line are intermittently visible. The Medway Viaduct to the north is also visible in the distance. This built development adds an urbanised character to the views.

Summary

- 5.15 Overall the Site is considered to be of low sensitivity as it is of low landscape value and it has a very localised visual envelope to the north, west and south due to the surrounding landform and landcover (vegetation and built form). Whilst the visual envelope to the east is more extended, the Site interior is only partially visible from certain locations, and where visible it is seen in conjunction with the adjacent existing residential and industrial development. The visual character is one of a semi-developed, urbanised landscape.
- 5.16 In most views it is only the vegetation within the Site that is apparent, and this tends to visually coalesce with other vegetation along the valley sides and in the escarpment above. The vegetation within the Site, including the dense boundary vegetation along its eastern edge, filters views to the interior and thus offers a degree of physical and visual enclosure.

6.0 OPPORTUNITIES AND CONSTRAINTS TO DEVELOPMENT

- 6.1 The Site is considered to provide the opportunity for residential development from a landscape and visual perspective due to: the proximity to and influence of the existing built forms to the north, west and south; the extent of enclosure provided by the existing vegetation framework bordering the Site; and that the existing settlement pattern already extends along the majority of the lower valley side within which the Site lies.
- 6.2 Nonetheless, any development within the Site will need to ensure that the boundary vegetation is retained and enhanced, so as to sensitively and sympathetically integrate the development into its surroundings.

Site Opportunities and Constraints

Opportunities

- 6.3 Opportunities for development within the Site are that:
- The Site is not covered by any landscape designations;
 - There is an existing vegetation framework bordering and enclosing the Site, which offers a degree of physical and visual enclosure and results in a very localised visual envelope;
 - The Site does not exhibit any rare landscape features; and
 - The Site is not publicly accessible and, other than PRoW RS220 extending along its northern boundary, affords no opportunity for public recreation.

Constraints

- Development should be offset from the existing woodland within the Site and the boundary vegetation structure to respect the extent of Root Protection Areas (the extent of which should be determined by an arboricultural survey); and
- Development on the higher ground in the western part of the Site may be apparent in views from the east, and accordingly it is recommended that development proposals incorporate a robust landscape framework to aid in screening and softening these views, with the potential to incorporate advanced planting.

Response to Landscape Character

- 6.4 The development proposals could respond positively to the environmental and landscape opportunities identified for the North Downs NCA Profile through the protection and enhancement of a diverse range of woodlands and trees, including the vegetation within and bordering the Site.

- 6.5 In relation to the Kent Downs – Medway, Western and Eastern Scarp LCA, the development proposals could help create a landscape framework to provide enclosure for urban areas, using characteristic woodland to help provide a network of semi-natural habitats. Also, in relation to LCA 39: Halling Quarries, development proposals could introduce appropriate native planting to screen the new development from footpaths, roads, existing settlements and rural areas.

Response to Planning Policy

- 6.6 The development proposals within the Site could respond positively to the identified policies within the NPPF and the saved policies from the Medway Local Plan 2003, in addition to the emerging policies set out within the Development Strategy technical document. As part of the development proposals, the existing vegetation both within and enclosing the Site could be retained and enhanced, and could be supplemented through the provision of additional areas of planting (utilising locally distinctive species). This could help create green infrastructure linkages through the Site, while breaking up and softening the overall perceived scale, mass and extent of introduced built forms. The siting, density, layout and materials of introduced built forms could also make a positive contribution and respond appropriately to the character and appearance of the surrounding landscape.

Design Strategy

- 6.7 A series of design considerations have been identified as a result of the landscape and visual appraisal and include:
- Existing vegetation structure should be retained, reinforced and enhanced. Implement effective landscape management to ensure thinning, selective felling and replanting to achieve a varied age structure;
 - Provide new areas of planting, including shaws or wide hedgerows, with appropriate locally distinctive species, to soften and break up the perceived mass of the introduced built forms in views. Tree planting should be incorporated along the Site contours throughout the development proposals, including along roads and within public open spaces, to help soften the appearance of the built form within the Site in views from across the River Medway valley;
 - Ensure that the introduced built forms are designed to contribute positively to the sense of place and local distinctiveness and respond appropriately to the character and appearance of its surroundings;
 - Ensure that any built forms are offset in relation to the root protection areas of existing vegetation to be retained within and bordering the Site.
 - The amenity value of PRow RS220 along the northern edge of the Site should be enhanced, as currently it is a narrow corridor route, separated from the Site by scrub

and scattered trees. Pockets of open space and more open views into the Site and the River Medway to the east should be introduced, with the potential for play areas incorporated within a parkland setting along this route; and

- The wider pedestrian connectivity locally should be enhanced, by introducing pedestrian connections between Pilgrims Road / Way to the west of the Site and PRow RS220 to the north of the Site, through the Site.

7.0 GREEN BELT REVIEW

- 7.1 An assessment of the contribution of the Site to the first four purposes of the Green Belt, as set out in Paragraph 80 of the NPPF, has been undertaken in Table 7.1 below.

Table 7.1: Contribution of the Site to the Purposes of the Green Belt

Purpose	Critique	Contribution
Check the unrestricted sprawl of large built-up areas	As the Site is currently comprised of an open field the introduction of built development would undoubtedly result in a physical extension of the settlement pattern. However, given the presence of existing residential development adjoining the Site to the north, west and south and the A228 to the east, built development within the Site would be generally in keeping with the character of the immediate surrounding landscape. This would be perceived as a coherent extension to the existing settlement pattern, rather than unmanaged sprawl. In addition, the Site is contained by robust physical features - dense boundary vegetation and woodlands - which would serve to visually contain built forms and thus further diminish any potential perceived sense of sprawl.	Limited
Prevent neighbouring towns from merging	Whilst the introduction of built development to the Site would result in a degree of physical infill, there would only be a limited perceived reduction in separation between adjacent areas of settlement. This is due to the Site being physically contained by existing built development, as well as the urbanised character of the surrounding valley floor landscape, in which there is little existing clear distinction between settlements. The existing residential properties on Pilgrims Road / Way are perceived as defining the western extent of the Site despite being 'washed over' by the Green Belt designation. Given the above, the development of the Site would result in only a limited reduction in the physical separation between areas of settlement, while perceptibly there would be no reduction.	Limited
Assist in safeguarding the countryside from encroachment	There are currently no built or engineered forms located within the Site, although electricity pylons cross along its southern extent. However, built development adjoining the Site and defining it to the north, west and south, mean there is minimal perception of it being undeveloped. The surrounding landscape contains industrial features and a busy communications corridor that in conjunction have an urbanising influence over the Site. In addition, vegetation surrounding the Site offers a degree of physical and visual containment, meaning views into the Site are generally filtered. Development within the Site would result in a limited urbanising influence.	Limited
Preserve the setting and special character of historic towns	The Site does not have a physical, visual or character connection with the historic part of any town.	None

- 7.2 The NPPF states that the key characteristics of the Green Belt are "***their openness and their permanence***". As demonstrated in Table 7.1, the Site is considered to be inherently open due to it comprising an open field with areas of scrub and woodland. However, it is pertinent that the Site is physically adjoined on three sides by built development, albeit the existing

development on Pilgrims Road / Way falling within the Green Belt designation (i.e. 'washed over' by the designated area). Despite the physical reduction in openness that would occur should the Site be developed, the perceived reduction would be limited. Any development would appear as a coherent extension to the existing settlement pattern and would be in keeping with the urbanised character of the surrounding valley floor landscape. Moreover, the Site is contained by dense boundary vegetation and woodlands, which would serve to visually contain introduced built forms and thus further diminish any potential perceived sense of sprawl.

- 7.3 Built development on Pilgrims Road / Way to the west of the Site is 'washed over' by the Green Belt designation. Consequently, while there is a small parcel of land that is defined as Green Belt between North Halling and St Andrews Park, this land is not perceived to separate these two areas given the presence of the adjoining built development to the west that effectively connects these respective areas together.
- 7.4 Given the above, the release of the Site from the Green Belt offers the potential to consolidate the settlement pattern and redefine the boundary of the Green Belt (and western extent of the defined settlement boundary) to a feature that is actually perceived as the settlement edge, i.e. built development along Pilgrims Road / Way, as opposed to a short section of the A228.
- 7.5 The land beyond Pilgrims Road / Way to the west is formed of the steeply rising escarpment that contains numerous areas of woodland, including ASNW. This would form a robust and defensible boundary that is likely to be of permanence. This would be a more appropriate boundary and one which aligns with how the extent of the developed area is perceived.
- 7.6 Moreover, it is crucial to note that as set out in Paragraph 85 of the NPPF, when defining Green Belt boundaries local planning authorities should “**not include land which it is unnecessary to keep permanently open**” and “**define boundaries clearly, using physical features that are readily recognisable and likely to be permanent**”. The release of the Site and the immediately adjoining built form that lies east of Pilgrims Way / Road from the Green Belt will satisfy the policy requirements of the NPPF.
- 7.7 Should the Site be released from the Green Belt and subsequently be developed as per the principles set out in Section 6 of this report, the openness of the remaining designated area would remain intact given the generally limited visual envelope of the Site and that it is already perceived to be physically contained by existing built development. On this basis, development of the Site would not compromise the purposes and function of the remaining Green Belt and accordingly should be released from the Green Belt.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 The Site is located within an urbanised landscape situated on the lower slopes of the western side of the valley of the River Medway. Whilst the Site is within the Green Belt, it is surrounded by residential properties on three sides, including recent residential development to the south of the Site. The A228 and Pilgrims Road / Way provide connectivity to the residential settlements and various land uses along the valley. Beyond this to the west, the rising escarpment forms a physical and visual backdrop that is primarily wooded with some areas of exposed chalk scarps.
- 8.2 With the exception of being within the Green Belt, the Site is not subject to any planning policy or landscape-related designations.
- 8.3 The Site is approximately 6.8 hectares in area and comprises an unmanaged, sloping field which falls from approximately 25m AOD in the west to 5m AOD in the east. There are blocks of woodland in the south-eastern corner adjoining the A228 and the south-westernmost corner adjoining Pilgrims Road / Way. The Site is defined on its southern and eastern edges by dense belts of boundary vegetation. Electricity pylons extend along the southern boundary of the Site, beyond which is the recently constructed St Andrews Park residential development.
- 8.4 The published landscape character assessments describe a predominantly chalk landscape, cut by deep valleys including the Medway Valley, where the upper slopes are typically well wooded. More locally, the Medway Valley is described as an incoherent landscape with wide, open views, and of poor condition. Guidelines include the creation of a strong landscape framework to provide a network of semi-natural habitats, and screening development with appropriate native planting from footpaths, roads, existing settlements and rural areas. The published assessments broadly reflect the local landscape character of the western edge of the River Medway, which is incoherent and of low sensitivity.
- 8.5 The Site is generally reflective of the wider landscape character of the Lower Medway Valley, being rural-fringe in character and influenced by urban/industrial development nearby. Overall the Site is considered to be of low sensitivity, as it is of low landscape value and it has a very localised visual envelope to the north, west and south due to the surrounding landform and landcover (vegetation and built form). Whilst the visual envelope to the east is more extended, the Site interior is only partially visible and where visible it is seen in conjunction with surrounding residential and industrial development. The visual character is influenced by the presence of urbanising and industrial elements in the context of the Site. In most views the vegetation surrounding the Site, including the dense boundary vegetation along its eastern edge, filters views to the interior and thus offers a degree of physical and visual enclosure.

- 8.6 The Site is considered to be inherently open due to it comprising an open field with areas of scrub and woodland. However, it is pertinent that the Site is physically adjoined on three sides by built development, with the existing development on Pilgrims Road / Way falling within the Green Belt designation (i.e. 'washed over' by the designated area). Despite the physical reduction in openness that would occur should the Site be developed, the perceived reduction would be limited. Any development will appear as a coherent extension to the existing settlement pattern and would be in keeping with the urbanised nature of the surrounding valley floor landscape. Moreover, the Site is contained by dense boundary vegetation and woodlands, which would serve to visually contain built forms and thus further diminish any potential perceived sense of sprawl.
- 8.7 The release of the Site from the Green Belt offers the potential to consolidate the settlement pattern and redefine the boundary of the Green Belt to a more appropriate boundary feature that is already perceived as the settlement edge (i.e. the built development along Pilgrims Road / Way). The land beyond Pilgrims Road / Way to the west is formed of well-wooded (including ASNW), steeply rising escarpment that would form a robust and defensible boundary likely to be of permanence.
- 8.8 As a result of the above considerations, it is concluded that sympathetic development within the Site would be acceptable in landscape and visual terms and would not compromise the purposes and function of the wider Green Belt. On this basis, the Site is considered appropriate for release from the Green Belt and should be allocated for residential development.

Revision
The scaling of this drawing cannot be assured
Date
27/04/2018
Drawn by
GS
Checked by
DH
Project No.
23486
Drawing No.
L1
Revision
-

Legend

- Site Boundary
- Existing Woodlands, Coppices and Tree Belts
- Existing Water Courses and Features
- Contours/Spot Heights (Metres AOD)
- Public Rights of Way
- National Trails / Long Distance Walks
- Listed Buildings
- Scheduled Monument
- Registered Parks and Gardens
- Cobham Hall
- Ancient Woodland
- Area of Outstanding Natural Beauty
- Green Belt
- Countywide Rights of Way Access Areas
- Sites of Special Scientific Interest
- Countryside Park
- Area of Local Landscape Importance
- Strategic Gap
- National Character Area (NCA) Profiles
- NCA 119: North Downs (The Site is within this NCA)
- NCA 120: Wealden Greenland
- Visual Appraisal
- Location of Photographic Viewpoints
- Open views of the Site
- Filtered views of the Site
- No Views of the Site

FIGURE 1
Project
North Field,
Halling, Kent
Drawing Title
Site Context Plan

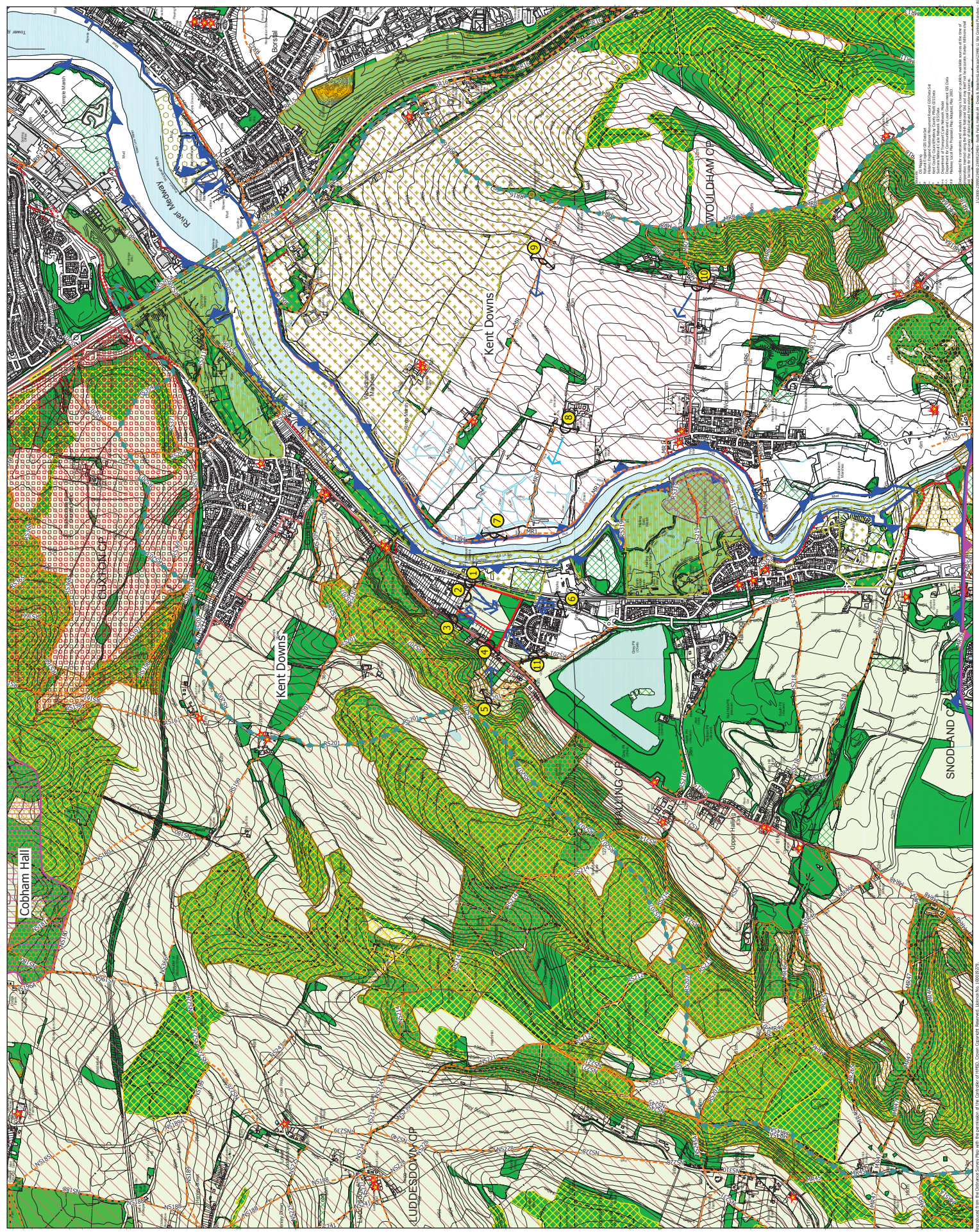
Date
27/04/2018
Scale
1:10,000 A3
Project No.
23486
Drawing No.
L1
Revision
-

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Office of Bartons Willmore Limited, 100, The Quadrant, London, W1 1AA



LEGEND

-  Site Boundary
-  Existing Water Courses and Features ^
-  Contours/Spot Heights (Metres AOD) ^
-  Public Rights of Way *
-  Location of Photographic Viewpoints (Site Appraisal Photographs: A-C)

Sources:
* OS Mapping
* Midway Council Prow GIS Data

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

Date	26.04.2018	Scale	1:2,000 @A3	Drawn by	GS	Check by	DH
Project No	23486	Drawing No	L2	Revision			



FIGURE 2
Project
**North Field,
Halling, Kent**
Drawing Title
Aerial Plan of Site



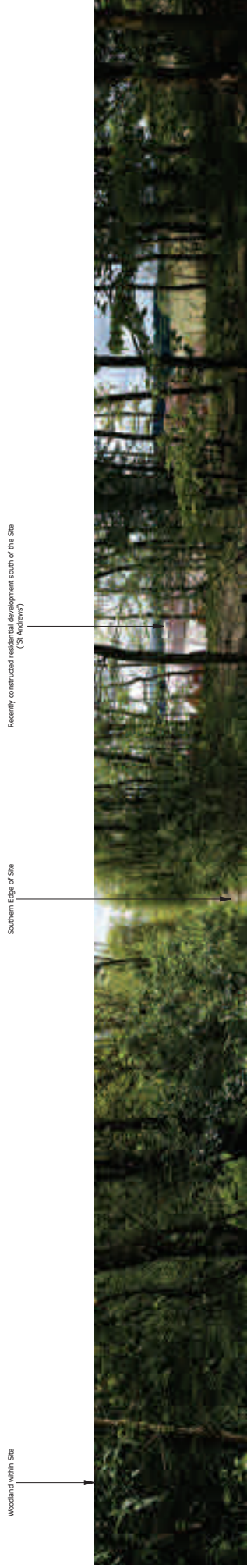
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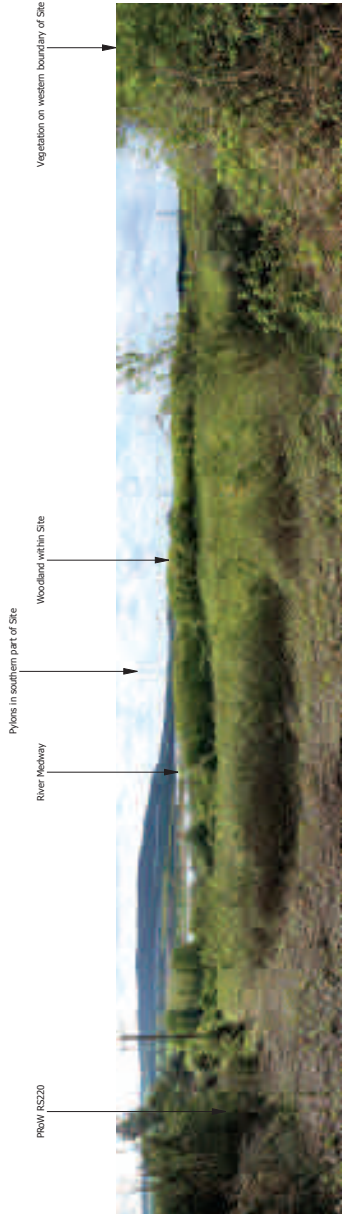


Office at Birmingham Retail Corridor, Coventry, Edgbaston, Edgbaston
Glasgow, Leeds, London, Manchester, Newcastle, Reading, Southampton





SITE APPRAISAL PHOTOGRAPH A : VIEW FROM SOUTH-WEST CORNER OF SITE, LOOKING EAST'



SITE APPRAISAL PHOTOGRAPH B : VIEW FROM NORTH-WESTERN EDGE OF SITE, LOOKING SOUTH



SITE APPRAISAL PHOTOGRAPH C : VIEW FROM THE NORTHERN BOUNDARY OF THE SITE, LOOKING SOUTH-WEST



SITE CONTEXT PHOTOGRAPH 1: VIEW FROM PROW RS220, FORMBY ROAD (A228), LOOKING WEST

Distance: 19m



SITE CONTEXT PHOTOGRAPH 2: VIEW FROM PROW RS220, LOOKING SOUTH-WEST

Distance: 2m



SITE CONTEXT PHOTOGRAPH 3: VIEW FROM PILGRIMS ROAD / WAY, LOOKING SOUTH-EAST

Distance: 71m



SITE CONTEXT PHOTOGRAPH 4: VIEW FROM PILGRIMS ROAD / WAY, LOOKING EAST

Distance: 5m



SITE CONTEXT PHOTOGRAPH 5: VIEW FROM PROW RS201, LOOKING EAST

Distance: 310m



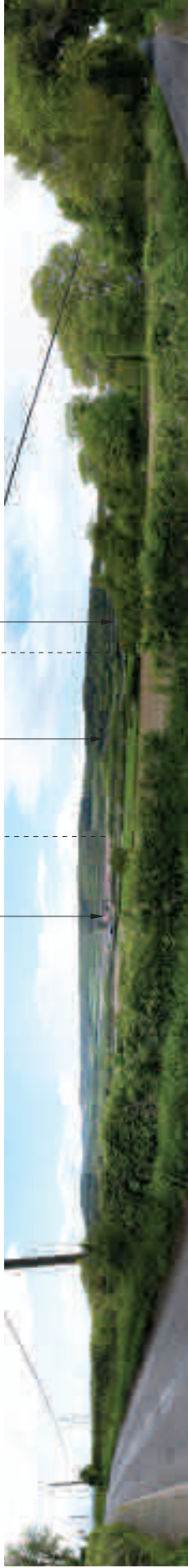
SITE CONTEXT PHOTOGRAPH 6: VIEW FROM FORMBY ROAD / ROCHESTER ROAD (A228), LOOKING NORTH

Distance: 240m



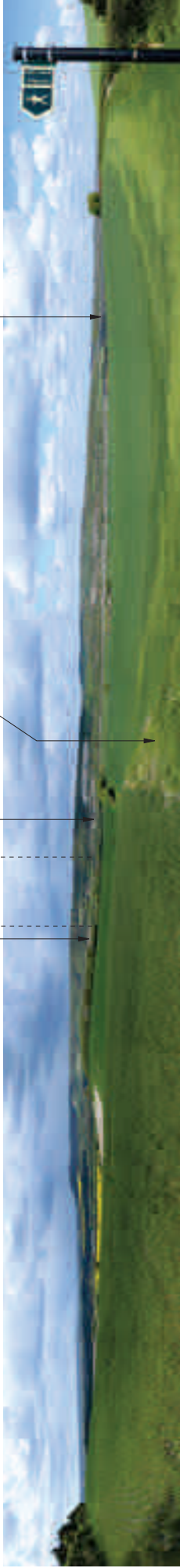
SITE CONTEXT PHOTOGRAPH 7: VIEW FROM AONB (KENTS DOWNS), LOOKING WEST

Distance: 327m



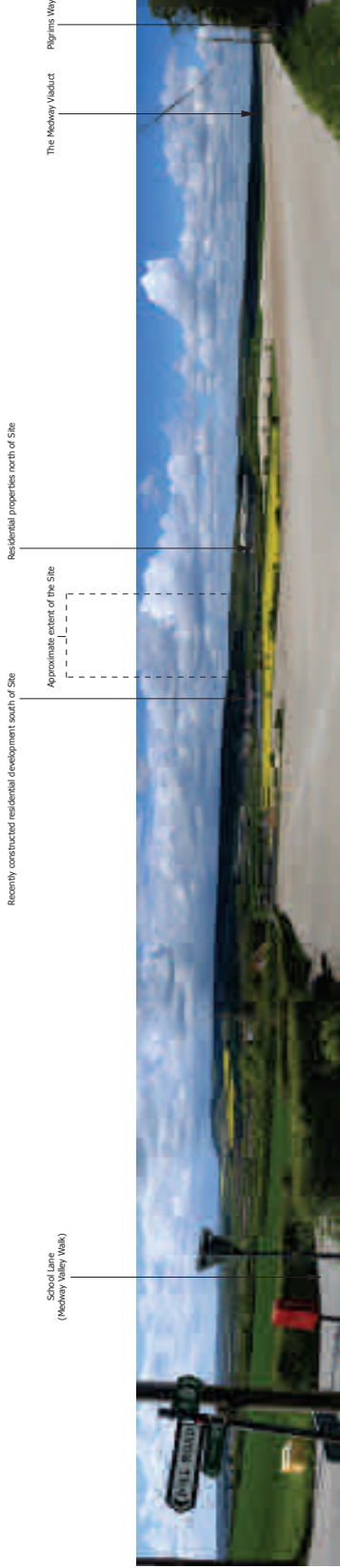
SITE CONTEXT PHOTOGRAPH 8: VIEW FROM WOULDHAM ROAD, LOOKING NORTH-WEST

Distance: 1.03km



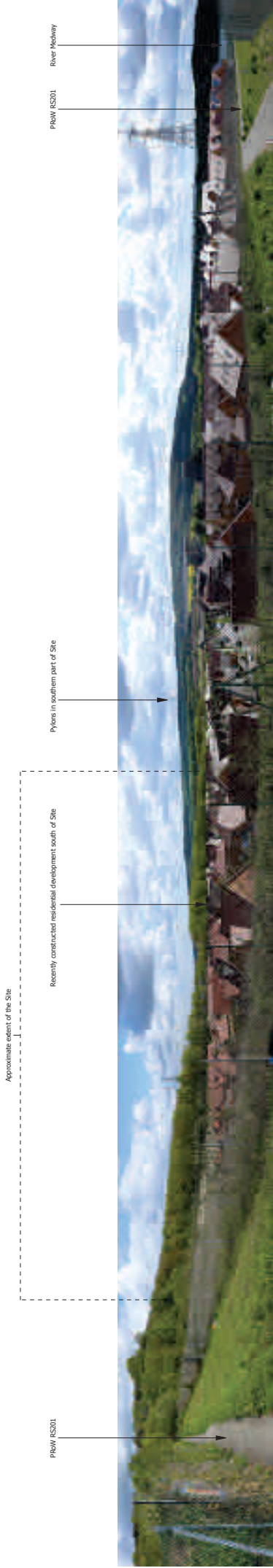
SITE CONTEXT PHOTOGRAPH 9: VIEW FROM PROW/MR2, LOOKING WEST

Distance: 1.95km



SITE CONTEXT PHOTOGRAPH 10: VIEW FROM PILGRIMS WAY, LOOKING NORTH-WEST

Distance: 2.1km



SITE CONTEXT PHOTOGRAPH 11: VIEW FROM PROW/RS201, LOOKING NORTH-EAST

Distance: 216m

Sent by email to: futuremedway@medway.gov.uk

30/10/2023

Dear Sir/ Madam

HBF response to regulation 18 consultation - Setting the Direction for Medway 2040

1. Thank you for consulting the Home Builders Federation (HBF) on setting the direction of the Medway Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.
2. The Consultation document is relatively short and whilst it sets out some broad objectives as to what the Council will try and achieve through this local plan it provides no detail as to the policies that will be included in the local plan to achieve them. Given that this is the fourth regulation 18 consultation since 2016 it is disappointing that there appears to have been very little progress. The HBF recognises that the uncertainty around planning policy can make progress challenging but we would urge the Council to move forward rapidly from this point to publication and submission. With regard to what has been included in the consultation the HBF's main comments relate to the Council's position on development needs and the supply of land for housing.

Plan period.

3. The Council are proposing a plan period of 2020 to 2040. The HBF are concerned that this may not be sufficient to ensure that the strategic policies in the local plan, as required by paragraph 22 of the NPPF, will look ahead for at least 15 years from adoption. From regulation 18 we would expect the council to take a minimum of two years to go through a

regulation 19 consultation, submission, and examination and adoption. Which would mean the council adopting the plan late 2025 or early 2026 meaning the plan would only look ahead for 14 years. To ensure consistency with the NPPF the HBF would recommend the plan period is extended to 2042 to ensure that any delays in plan preparation are considered.

The need for new homes

4. Paragraph 5.4 of the consultation document notes that the Council has raised concerns about the standard method, its use of the 2014 based household projections and the marked variation in the levels of housing need it generates in comparison to more recent household projections. Whilst the HBF understands the council's point with regard to the 2014 based projections the Council need to attach significant weight in preparing this local plan to the housing crisis that the country is currently facing which is the primary reason why the Government has continued to require its use in the standard method. Only through a significant uplift in housing delivery across the country, and in particular in the south-east of England, will there be any hope of stabilising house prices over the long term and ensure that there are enough homes to meet everyone's needs.
5. It is important to recognise that the shortfall of housing is a long term structural issue, there is just not enough homes in relation to the size of the country's population. The issue of population size and the size of the housing stock is considered in recent report by the HBF which compares the UK housing market with other European countries. What is notable from this research, is that England has far fewer dwellings relative to its population than other developed nations. For example, Italy and France have around 590 homes per thousand inhabitants compared to just 434 in England, which is also well below the OECD average of 487.
6. This dearth of properties makes England the most difficult place in the developed world to find a home, with the rate of available properties per member of the population at less than 1%, the lowest rate of all OECD countries. The relatively low number of homes for the size of population will impact on the cost of housing. The research found, not only that housing is very unaffordable in the UK but that other similar European nations, for example Belgium and France, have seen incomes better keep pace with house prices and in some cases, such as Finland the have fallen slightly as a proportion of income. Whilst this is national

data it provides stark evidence as to the shortage of housing across the country and the need for all areas to boost supply if affordability is to improve.

7. The Council correctly identify the outcomes of this shortage of homes in Medway with affordability worsening significantly in the last 10 years, more people living in overcrowded/ substandard accommodation or staying with parents far longer than previous generations due to the lack of available and reasonably priced housing. If this issue is to be addressed the Country needs Councils such as Medway to plan for levels of housing that are well above what was delivered in the past and above current population projections. If the Council, and indeed all councils, do not take on its strategic responsibilities with regard to significantly increasing the supply of land for new housing then the issues outlined above will never be addressed.

Housing needs from other areas

8. Consideration will need to be given as part of the Council's duty to co-operate as to whether delivery beyond this level could be achieved to address shortfalls elsewhere. Any engagement on this matter must be constructive, active and throughout the plan making process if the Council are to show that they have fulfilled their duty to co-operate on this key cross border issue. The HBF are aware that Gravesham have indicated that they may not be able meet their own needs due to constraints and it will be for Medway, and other neighbouring LPAs in Kent to consider how any unmet needs that do arise could be met in their authorities. If they cannot help, then Medway will need to challenge Gravesham to take the necessary steps to meet its own needs, such as making amendments to Green Belt boundaries.
9. In addition, the Council will be aware that London will not meet its own housing needs between 2019 and 2029. Over the next ten years there is projected to be a shortfall of 14,000 homes per annum in the capital that resulted from the over assessment of delivery from small sites and the subsequent amendments by the Panel examining the London Plan. Whilst the mayor intends to produce a revised London Plan before the termination date of the new London Plan with updated targets, the constraints on the capital will continue make it very difficult for the city's needs to be met in full and it will be important for areas such as Medway that could see increased migration as a result of the shortfalls in the London housing market to consider how it could increase its own housing supply to address some of these unmet needs.

The benefits of more new homes

10. As outlined above there is a significant need for new homes to address past shortfalls and meet future needs. Significant increases in the delivery of new homes will in the long term start to ensure that house prices stabilise and do not outpace growth household incomes. However, alongside these long-term goals for the market there are other significant benefits that arise from building more new homes.
11. Firstly, and one the Council will be keenly aware of is that increasing the overall delivery of new homes increases the number of affordable homes that can be delivered. The Council's Local Housing Needs Assessment sets out at paragraph 4.29 that in order to address the current backlog in affordable housing needs over a 15-year period as well as meeting newly arising need would require 621 new affordable homes to be built each year. Building at or above the rate arrived at using the standard method will support affordable housing delivery that is closer to what is needed. In particular the allocation of green field sites within the Borough will likely be able to support more affordable housing given that the cost of delivering such sites tend to be lower when compared to the development of brownfield sites.
12. An increase in house building in Medway will also support improvements in local infrastructure. Housing developers make significant contributions to improvement of roads, schools, open spaces, and leisure facilities. Across the country the housebuilding industry has contributed significant funds towards infrastructure and local services. In 2018/19 for example the industry contributed over £200 million towards creating new and improving existing schools and £45 million in improving community spaces and £74 million in creating green spaces.
13. In Medway the Infrastructure Funding Statement notes that in 2021/22 the Council received £6.4 million pounds in S106 contributions of which £2.7 million for education projects and £680,000 was for open space and £450,000 for health services. These contributions are significant and whilst they are there to address the impact of development there are clear benefits for everyone in the community from these contributions that must be recognised and be front and centre in the Council considerations as it moves forward with this local plan.

14. Delivering more new homes will increase the proportion of good quality homes in Medway increasing choice and drive improvements in housing standards across the market. England's ageing housing stock means that there is a higher proportion of homes in a sub-standard condition compared to many other European countries. In 2020 15% of the Countries housing stock failed to meet the decent homes standard, a level set by the Government that represents a desired minimum standard for housing. In Germany this figure was 12% and in Sweden and Norway for example it was 7.1% and 6.3% respectively. Older homes are also the most likely to have serious hazards, such as excess mould and structural collapse. Across England, Northern Ireland, and Wales, more than a quarter (26%) of homes built before 1919 had at least one hazard in the most serious category, compared to only 2.5% properties built after 1980. Not only does an increase in new homes means a higher proportion of the population living in better quality homes, but it also means that there is an increased choice of housing to consumers which will in the long term be one of the drivers in improving the overall quality of Medway's housing stock.
15. Finally, all new homes are substantially more energy efficient than the vast majority of the existing housing stock. Research by the HBF has identified that 85% of new build properties are rated A or B for energy performance compared to just 4% of existing homes. This means they require much less energy for day to day running, using approximately 9,400 kWh a year compared to older properties averaging over 21,000 kWh per year. This improvement can also be seen when size is taken into account with the average new build using 105kWh per m2 per year compared to 246 kWh per m2 in an existing property. New homes are already making a significant contribution towards meeting the national carbon reduction targets by allowing more people to live in more energy efficient homes.
16. This situation will only improve with the proposed changes to the Building Regulations from 2025 and the introduction of the Future Homes Standard. New homes are already being built to higher energy efficiency standards set out in the 2021 Building Regulations which delivers a 30% improvement in terms of carbon emissions on previous regulations, with further improvements expected from 2025 with the introduction of the Future Homes Standard. The Future Homes Standard will see a 75% reduction in carbon emissions on the 2013 regulations and mean that all new homes built as a result of this plan will be zero carbon ready.

Land Supply

Buffer in supply

17. The Council outline in paragraph 5.12 that providing for a buffer to allow for the fact that not all sites identified in the plan will deliver as expected. The HBF would agree with this and whilst there is no hard and fast rule as to an appropriate buffer, we recommend that local plans include at least 15% surplus in land supply over the housing requirement to ensure that the plan is deliverable over the plan period.

Windfall

18. In Council states in paragraph 5.13 that taking into account the current pipeline of extant planning permissions of 7,500 homes and a windfall allowance of 3,000 homes over the plan period. With regard to windfall the Council will need to provide robust evidence to support this relatively high level of windfall across the plan period ensuring that there is no potential for double counting with the supply of specific sites that are identified and allocated in the local plan. This will be particularly important as it appears that the Council have in the past included a significant allowance for larger windfall sites. The process of preparing this local plan should ensure that these larger deliverable sites are identified and allocated and as such far less reliance can be placed on larger sites to come through the as windfall.

Spatial Strategy

19. As for the spatial distribution of development in Medway the HBF does not have any comments specific comments other than that the Council should ensure that the sites allocated in the local plan are deliverable and developable and do not unnecessarily push back delivery toward the end of the plan period. Whilst the Council have not stated that they will need to use a stepped trajectory it is important that it is not an inevitable consequence of the spatial strategy taken forward in the local plan. One of the concerns the HBF has with many current plans that they rely too heavily on strategic sites with optimistic delivery rates which inevitably leads to stepped housing requirements that push back the delivery of new homes to later in the plan period and increase the risk that housing need are not met. This is not to say that large strategic sites should not be allocated but it should be alongside the allocation of smaller sites not at their expense.

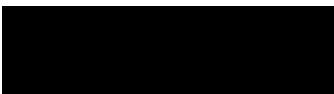
20. Whilst the Council are required to ensure at least 10% of its housing requirement comes forward on identified sites of less than one hectare we would suggest that the Council goes much further recognising that there are wider benefits of also allocating more medium sized sites that are larger than one hectare and would deliver up to 60 dwellings, the point at which SMEs start to compete with volume house builders. Firstly, such sites are the stock in trade of SME house builders across the Country who bring forward sites quickly ensuring a strong supply early in the plan period. Secondly, supporting small sites, and smaller house builders, increases the variety of house type and style that is available increasing the choice of available homes. Finally, strong SME housebuilding sector support local and regional supply chains and are often pivotal in bring forward innovation and supporting jobs growth locally, with 1 in 5 of the SME work force comprising of apprentices.
21. However, it is a sector that is under intense pressure. Research by the HBF has found that there are 85% fewer small house builders today than there was 20 years ago and that of a survey of 202 SME house builders 87% said they were considering winding up their residential activities in the next three years. Whilst this decline is due to a range of factors more allocations of small would ease the burden on many SME developers and provide more certainty that their scheme will be permitted allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted. The effect of an allocation is to take some of the risk out of that development and provide greater certainty that those sites come forward. This in turn will allow the SME sector to grow, deliver homes that will increase the diversity of the new homes that are available as well as bringing those homes forward earlier in the plan period.

Conclusion

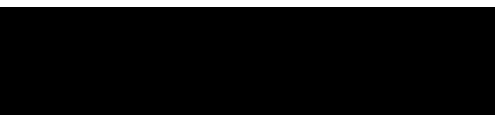
22. In taking forward this local plan it will be important for the council to recognise the strategic importance of increasing the supply of homes. The current housing crisis is a result of a long-term structural shortage of new homes in relation to the country's population and requires councils to make difficult long-term decisions to increase the supply of land for housing. However, the Council must ensure that it recognises the significant benefits from house building, some of which are highlighted above, and communicates these not only to its residents but also to local politicians.

23. The HBF would also like to highlight recent survey it has undertaken the finds of which are set out in our report Housing the Nation¹ that shows that the public are not only supportive of new house building to tackle the housing crisis they are also keen to hold politicians to account for their actions in this area. This survey found that 78% of respondents to the survey agreed there was a housing crisis with 68% agreeing building more homes was vital for overcoming the crisis. It also showed that local objection to housebuilding can appear to be overstated. 80% of those surveyed were supportive or not averse to more homes being built, with only 20% opposed to it. What this work suggests is that there is widespread support for building more homes and that this should not be ignored by what can be very few local objectors to new development.
24. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry if that would be helpful. The HBF would like to be kept informed of the progress and adoption of the Local Plan. Please use the contact details provided below for future correspondence.

Yours faithfully



Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation



¹ Housing the Nation (HBF, 2023) <https://www.hbf.co.uk/library/publications-reports-home-builders-federation/>

headley, andrew

From: Medway Council [REDACTED]
Sent: 31 October 2023 18:12
To: policy, planning
Subject: Contact Form from OpusConsult

Categories: Reg 18 email Responses

You have received a message from the OpusConsult contact form

[REDACTED]

Email: [REDACTED]

Message:

DRAFT MEDWAY LOCAL PLAN 2023 RESPONSE

1 Encourage, and monitor, industrial complexes to follow all regulations in operating their businesses to the benefit of the environment through more recycling, lower carbon emissions, control of gaseous emissions from their processes etc.

2 Control fly-tipping through the organisation of potential industrial waste recycling plant. Also, to arrange regulations to seriously fine any such operators,

3 Highways Department needs total control over “insensitive pop-up” roadworks, which affect the local economy through huge delivery delays.

4 Find one-way traffic systems in villages, where congestion is a regular issue.

5 Continue to promote 20mph zones and “sleeping policemen” points, where appropriate.

6 As the local Medway population is expanding, there should be more incentive to provide more allotment spaces and new sites, possibly on land presently “abandoned”.

7 Establish a department to regulate “ancient trees” and to give them TPO protection, even when they exist in private gardens and land.

8 Promote the use of a Countryside Officer for the purposes of education in regenerative farming practices and in establishing local “farming clusters”, where the gains to wildlife and humans alike can be discussed. This officer can also encourage the linkages of wildlife corridors to maintain biodiversity.

9 Continue to protect all Green Belt land and AONB’s as it is your statutory duty. Fortunately, Medway Council were able, of our behalf, to protect Bush Valley in Cuxton from unnecessary and unwarranted development, when the presiding government inspector, in a public enquiry recently, decided that “a vineyard is not within the national interest”.

[REDACTED]

31/10/23



[REDACTED]
Medway Council
Gun Wharf – Level 3,
Dock Road,
Chatham, ME4 4TR

24th November 2023
[REDACTED]

Medway Council Local Plan

Firstly thank you for the opportunity to provide feedback on the Medway Council Local Plan. As discussed I have taken the opportunity to send details of the plan to the MSBA membership and asked for feedback.

Unfortunately some people have not been able to access the full details of the councils plan which is a shame. I believe that this is down to the technology being used by the council which does need to be considered more carefully in its communication plans in the future.

However, that said I have had a significant number responses and I have tried to collect the responses under a number of three core headings for the Councils consideration. I have just captured the comments so that you can get a sense of the feelings.

Please let me know if you or the local Councillors would like to meet-up to discuss these areas further.

Medway River is an asset:

- The plan doesn't acknowledge the Medway River and the reducing shoreline as an asset.
- Current Councillors have not grasped that the Medway River is an asset that needs to be maintained and requires investment.
- Medway Council has significantly under invested in the River for far too long.
- Medway Council do not encourage the use of this major asset.
- There has been significant under investment in the river by the council for as long as we can remember.
- The piers alongside the marina at Chatham, and at Gillingham are both silting up and neither Peel Ports nor Medway Council seem to have any plan to sort this.
- The council bang on about how much of an asset it is but do little to encourage use of the asset. There used to be a thriving Medway River Festival but this has been reduced to an event off Sun Pier where public participation is limited.
- Kelly Tolhurst was the last Councillor of note who had a sound knowledge of the river and its users, indeed her and her father had a very much regarded boat yard on the river. With her escalation to M.P. there appears to be no council officer who has user experience or responsibility for The Medway. It no longer gets the priority it deserves.
- The plan seems to make no more than a passing reference to the River Medway as a possible transport option with no mention of recreational boating, either on an individual or group basis, as a community benefit.
- In this wordy document we can only find passing references to tourism and to use of the river as a means of local people movements. The Council should realise there is huge opportunity for increased water-based tourism if only they would enable more shoreside access, and encourage people to visit by sea. It would for instance be a great attraction to boaters from across the Channel especially from the Netherlands. We do not however support any notion that the Council should be responsible for running any such expanded facilities. Opportunities should be made for independent enterprises to create and run any such facilities.
- We note with concern the intention to develop the wooded area north of Medway Sailing Club. This is a very dense oak wood and is about the only area on the river where oak trees come down to the



beach. This woodland is home to tawny owls, nightingales, buzzards and other woodland birds and wildlife. It commendable that the Plan talks about riverside footpaths and expanding wildlife tourism. This area is doing exactly that and would not require additional expenditure. It is completely accessible now and families are often seen having a BBQ or picnic along this stretch of what is effectively "beech". The river side is not sheer here and if it were concreted this would all be lost.

- Many foreign tourists already use the river to visit the Medway area arriving by boat from Holland, France and other places in the UK. The historic aspects of the river are a big draw to sailors as well as the general public. Providing a slip way or pier area where they can get ashore would encourage expenditure at local tourist attractions etc.
- The general intention to pack as many houses as possible into the Medway area will create a location where people do not want to live. Those in villages and on the Hoo Peninsular live there because they like this sort of space. The Peninsular has one way on and one way off and additional congestion and pressure of services must be considered in full as the Plan developed.

Access to and from the Medway River:

- The Plan focuses on residential and industrial development along the river with no reference to its use as a leisure facility.
- For people to use the river there needs to be ease of parking, ease of launching and all weather facilities.
- The lack of maintenance on the Strand slipway is a real issue that impedes its use.
- In order to use the river there needs to be better parking close to the access points.
- There needs to be better public toilet facilities along the riverside – The ones at Upnor have been sold by the Council!
- There is no access to the shore below Rochester bridge on the Rochester side until Sun Pier.
- Sun pier would be a fantastic short stay mooring that accesses the restaurants in that area but beset by vandalism, payment machines that don't work and no overnight mooring.
- In order for people to get out on the river there needs to be more and improved launching and recovery facilities along its entire length.
- Strood Pier used to access Strood and most important the Train station to and from London and upstream of Rochester bridge a defective pier to Rochester high street. These piers could then be commercially used for short hops around the Medway towns.
- The Slip at Gillingham is lacking proper facilities to enable it to be used, no waiting pontoon post or pre-launch.
- The slip at the Strand is not safe and Queenborough is the next slip open to the public.
- Access on foot along the river needs to be maintained – building up to the rivers edge needs to be stopped.
- Public Toilets near the river have been recently lost in Lower Upnor and the Plan should consider provision of these facilities. People walking the riverbank need these facilities as well as sailors and they should be seen as an integral part of encouraging people in leisure activities and visits to the historical and beautiful parts of the river.
- More public mooring buoys with access to the shore by dinghy would encourage more visitors by sea.
- Other MSBA members will raise access and launch facilities, something that we are fortunate not to need, but would support the expansion/maintenance of same. Should this not occur development of the shore line will result in the situation on the Thames ,where visiting vessel access is limited to commercial marinas etc.
- Any increase in passenger services on the river would require landing stages in Strood, Medway Industrial Estate Rochester, Chatham, Gillingham which would be a mix of new and refurbished facilities.
- The proposed increase in housing/population suggests a need for leisure and community facilities.
- There are currently a number of clubs and organisations accessing the river but there is limited access except through these and so an increase in public launch and landing sites would support the leisure activities of an increased population.



- The Plan mentions the need for leisure activities and the river should be seen as a “centre” for these. The river provides a resource for paddle boarding, canoeing, sailing and other boating activities. These activities are regulated in respect of speed limits on the river by Peel Ports but space is required along the river frontage to enable these vessels to be launched.
- There is a need for parking close to the river and slipways to enable launching of lighter vessels.
- The development of local sailing clubs with shore-line access and winter storage facilities needs to be encouraged
- The Council needs to encourage the development of the services and industries locally that are required to support the leisure community, i.e. low cost marine skills based engineering workshops/showrooms
- The Council needs to support the training and skills development of a leisure based work force for the area.

Additional use of the river and standards of behaviour:

- More river users would mean that there would need to be better policing of both the speed limits in force on the river and the frankly dangerous behaviour of the majority of jet ski users.
- Any increase in river traffic to help with the commuting issue would need to be balanced with the use of the river for leisure and sport reasons.
- Due to a recent spate of incidents involving Personal Water Craft (PWCs) a very large majority of the boating community would welcome a total ban on PWC activity in the Medway and Swale.
- We would like to see more patrols from the police and the harbourmasters launches as these are as rare as unicorns nowadays. This has resulted in a very steep rise in crime on the water including thefts and disrespect for local bylaws and speed limits.
- We would support a law to enforce certification of all boat users which would improve safety and save thousands if not millions of pounds annually and also save lives.

As mentioned we have had a significant response to the Plan and the above comments capture the general feeling of the leisure community in that Medway Council is not investing in the River as a leisure facility, under estimates the value of this Asset and is in fact putting barriers in the way of it developing its full leisure potential through its poor planning policy of building up to the river edge and not encouraging water based leisure facilities along the river to develop or the development of the necessary knowledge and skill based required to support what could be a significant leisure business and contributor to the local economy.

As mentioned I would be more than happy to meet with the Council to discuss any of the above. I look forward to hearing from you.

Kind regards

[Redacted signature]