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2023-10-31

Dear Medway Council,

### **“Setting the direction for Medway 2040” – Medway Local Plan 2040**

Railfuture is Britain’s leading and longest-established national independent voluntary organisation campaigning exclusively for a better railway across a bigger network for passengers, and freight users, to support economic (housing and productivity) growth, environmental improvement and better-connected communities. We seek to influence decision makers at local, regional and national levels to implement pro-rail policies in development and transport planning.

#### **1. Introduction**

1.1 Medway Council is preparing a new Local Plan to set the framework for the area's growth up to 2040. The Local Plan will provide a framework for where and how new development can take place.

1.2 This document has been published in the first few months of the new Labour and Cooperative Group administration of the Council. This is a statement of the Council's commitment in getting a new Plan in place. The Plan will provide certainty on the direction for Medway's growth and show how the Council will help deliver on its ambitions for the local and global environment, supporting people and boosting jobs and investment in Medway.

1.3 The Council is consulting on this document to get input from local people, businesses, community and interest groups and wider organisations to the direction and content of the new Local Plan. This document considers why we need to plan for Medway's growth. It looks at where we need to make changes, such as our high streets which have been impacted by changes in shopping patterns. It refers to those aspects of Medway that we want to safeguard for the future, such as beautiful landscapes and historic buildings. This document also outlines potential options for where we may build new homes, workplaces and services, such as schools and surgeries.

1.4 This consultation does not detail policies or identify those sites preferred by the Council for new development. That detail will come in the next stage of work on the Local Plan, which the Council will publish next year.

1.5 This is a good opportunity for people to contribute to the important discussions about how Medway could change over coming years. This consultation will help to define priorities for our environment, communities and economy. These can then be reflected in how we draw up policies for the new Plan. We also want people to share their views about regenerating the urban centres and riverside sites in Medway, and potential development in suburban and rural areas.

[www.railfuture.org.uk](http://www.railfuture.org.uk) [www.railfuturescotland.org.uk](http://www.railfuturescotland.org.uk) [www.railfuturewales.org.uk](http://www.railfuturewales.org.uk)  
[www.railwatch.org.uk](http://www.railwatch.org.uk)

## 2. Context

2.1 The Local Plan will set out the direction for Medway's growth over coming years. It will be a Plan for people who live, work, or study in Medway and visitors. It will be a Plan for Medway as its own place. A complex place, which encompasses distinct towns and villages, with their own strong identity and history. A place of contrasts, from remote marshes and mudflats to busy urban streets. A place of noted heritage, but also looking to the future, with innovation and enterprise, and universities and colleges equipping students with skills for the changing world of work.

2.2 People will be at the centre of the Plan. The Council wants Medway to be a healthy place to live, with clean air, high quality, well designed housing, greenspaces for people to enjoy, places for people to mix, and job opportunities to support a good quality of life. Currently there are marked differences in health and wellbeing across communities in Medway. The Plan needs to look at how we plan for the use of land to help people to live healthier and longer lives, and provide safe, connected and sustainable places.

2.3 The Plan will consider the diverse communities who make up Medway. Policies for housing, employment, transport, services and community facilities, retail and design need to take account of the needs of different sectors of the community. This will be reflected in the types of housing planned and infrastructure required, such as schools and parks.

2.4 The Plan must address big issues for Medway – the environment, high quality energy efficient homes that are affordable and within the reach of residents, health and wellbeing, boosting the economy and tackling deprivation. There are many areas where we need to improve on the current position. The Local Plan is one of the approaches that the Council can take to help address inequalities, poor environmental standards and reduce pressures on services. The plan will be about ambitions that can be achieved for a confident future Medway.

2.5 Climate change is a global emergency but needs to be addressed at all levels. Medway as a coastal area is particularly vulnerable to rising sea levels, and changes in temperature and precipitation have impacts for landscape, food production, nature and people. The new Local Plan will help to secure a more resilient future for Medway.

2.6 The River Medway is a key asset, providing a strong sense of place and identity. However, the river bisects the area and movement is constrained by four crossings. The severance caused by the river, established commuting flow patterns and travel behaviour, the legacy of post-war development designed for the car, generous car parking provision in dense employment areas and the existing public transport offer make for a challenging environment in which to accommodate Medway's development needs. The new Plan will need to set out a strategy for how we can reduce car dependency. This will involve thinking differently about how people can move round the central urban areas on foot or bicycle and improving sustainable transport connections from the suburban and rural areas, including consideration of better use of the river for transport. Medway's location in north Kent gives rise to additional opportunities and challenges associated with wider growth, such as the proposed Lower Thames Crossing (LTC).

2.7 The Local Plan will be about much more than identifying sites for new housing, but this will be a key part of the Plan and generally attracts the greatest levels of interest at consultation. There are huge pressures on housing. Decent homes are unaffordable for many people. Unfortunately, some of the accommodation locally is sub-standard and there are challenges in securing decent standards with some conversions, particularly where they are undertaken under permitted development. The supply of new housing is central to the

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new Local Plan, but it is about more than housing numbers. The Plan will seek to improve the choice and mix of homes, drive up quality, and meet the needs of different sectors of the community. Housing-led growth can support wider investment in services and businesses and contribute to shaping the character of new and existing communities.

2.8 The Plan can help Medway to capitalise on its strategic advantages for businesses, with transport links, proximity to London, the cluster of universities and colleges, and a diverse portfolio of employment land from the strategic landholdings at Grain and Kingsnorth, to re-purposing vacant retail units on the High Streets. There are opportunities to redress the flow of commuters from Medway to jobs in London and attract more businesses to set up locally. This is central to Medway's economic strategy, but is challenged by current trends, particularly with cost of living pressures where people are being attracted to move to Medway for its choice of housing, but retain jobs in London.

2.9 The Plan will consider how Medway's infrastructure, such as schools, transport networks, health facilities, parks and community facilities, need to be upgraded in line with a growing and changing population.

2.10 This consultation document has been drawn up following the withdrawal of Government funding from the Housing Infrastructure Fund (HIF) for strategic transport and environmental schemes. The HIF programme sought to get key infrastructure in place ahead of growth coming forward in Medway. It is widely recognised that the existing transport networks are under pressure across Medway and upgrades are needed to cope with increased journeys that will come as Medway's communities and businesses expand. Infrastructure and environmental concerns are at the forefront of the Council's work on the new Local Plan. The withdrawal of the HIF funding means that the Council will look at alternatives for securing investment in transport and green infrastructure across Medway, as these remain strategic matters central to the new Plan.

**# Railfuture sets out below our 12 responses to the public consultation closing today.**

In summary, they appear after paragraph 3.1, four in paragraph 4.2, then after paragraphs 5.6, 5.11, 5.28, 5.35, 5.46, 5.54, and 5.62.

### **3 Vision for Medway in 2040**

3.1 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 transport, environment, retail and waste and minerals.

*The plan's vision is to establish Medway as a leading regional city, connected to its surrounding coast and countryside; with a thriving economy, where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets.*

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

*Medway has secured the best of its intrinsic heritage and landscapes alongside high quality development to strengthen the area's distinctive character. Medway has achieved 'green growth', development that has responded positively to tackling climate change, providing for healthier and more sustainable choices of homes, transport and workplaces, and reducing the risk of flooding. The countryside, coast and the urban open spaces are valued and benefit as joined up environmental assets in a resilient green infrastructure network.*

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*Important wildlife and heritage assets are protected and enhanced. Medway has transitioned to a low carbon economy, with a clear path mapped out to reaching 'net zero'. Improved travel choices and infrastructure have reduced the use of the car across Medway, with people benefitting from better provision for pedestrians and cyclists, and a greater public transport offer. This has transformed how people move through the central urban areas and strengthened the connections with wider neighbourhoods and villages.*

*Medway is defined by its river and estuaries. The urban waterfront is animated and accessible. Continuous riverside paths provide attractive and healthy connections, a draw for visitors and residents. The rural character of the Medway Valley and the Medway and Thames estuaries are valued landscapes and habitats are in good condition. There are new opportunities for river transport.*

*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.*

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

*Our high streets and centres have developed new uses and attractions in response to changes in retail, leisure and work patterns. Medway benefits from a network of centres that reflect the distinct character of its different towns, neighbourhoods and villages.*

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

*Medway's economic mineral resources may be worked to meet needs and will be safeguarded from unnecessary sterilisation and for use by future generations. Wharves and rail depots continue to be utilised for the importation and distribution of minerals and will be safeguarded for this purpose. A positive legacy will be left by mineral supply development in Medway.*

*Waste is managed as far up the Waste Hierarchy as possible to achieve a more circular economy.*

**# Railfuture response:** We endorse the Vision for Medway in 2040, and in particular "Improved travel choices and infrastructure have reduced the use of the car across Medway, with people benefitting from better provision for pedestrians and cyclists, and a greater

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*public transport offer.” and “All sectors and ages of the community can find decent places to live.” and “Derelict sites at Grain and Kingsnorth on the Hoo Peninsula have been transformed into thriving economic hubs.”*

## **4 Strategic Objectives**

4.1 The role of the Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment. The Council needs to clearly define what it wants to achieve from the new Plan – what are the issues to address, and what improvements and changes are sought. These are set out as strategic objectives for the Plan. The objectives will feed into the wording of policies and how sites and different locations are assessed for potential development. The objectives are presented around broad themes for the environment, communities, economy, and investment in infrastructure and design that is fit for the future.

4.2 The proposed objectives for the Plan are:

### *Prepared for a sustainable and green future*

~ 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’, and reduce the risk of flooding; promoting the use of nature-based solutions to climate change; seeking to protect the most vulnerable groups from the impacts of climate change; and supporting major shifts in modes of transport used to reduce carbon impacts.

~ 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.

~ To ensure the effective management of natural resources, including water and soil, and improving air quality, providing for the sustainable supply of minerals and minimising the production of waste, enabling it to be managed as far up the Waste Hierarchy as possible.

**# Railfuture response:** We endorse the above objective and the second of its four sub-sections in particular.

### *Supporting people to lead healthy lives and strengthening our communities*

~ To provide for high quality energy efficient homes that meet the housing needs of Medway’s communities, reflecting the range of sizes, types and affordability the area needs, including provision for specialist housing, such as for people with disabilities, gypsy and traveller accommodation, the elderly including those wanting to down size, students, first homes, and custom and self-build housing; and drive reductions in the carbon impacts of housing in new developments and securing opportunities for retro-fitting older properties.

~ To reduce inequalities in health and deliver better outcomes for residents, by promoting opportunities for increasing physical activity and mental wellbeing, through green

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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.

~ To strengthen the role of Medway's urban, neighbourhood and village centres, responding with a positive strategy to changes in retail; supporting independent retail and start-ups, encouraging new business uses into the High Street; securing a range of accessible services and facilities for local communities close to where they live; and realising opportunities for homes and jobs, with the main Town and larger village Centres providing a focus for new retail and community facilities and cultural activities, within the context of the distinct towns, neighbourhoods and villages that make up Medway.

**# Railfuture response:** We endorse the above objective.

#### *Securing jobs and developing skills for a competitive economy*

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

~ Build on existing strengths and expertise, such as engineering, energy and creative industries, and raise the profile of key sectors, to attract and develop the jobs of the future.

~ To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses; and improve graduate retention.

~ 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.

~ To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services.

~ To support growth in tourism, cultural and creative industries, extending the offer to include green tourism and city breaks, including realising opportunities in the domestic tourism market.

**# Railfuture response:** We endorse the above objective and in particular its penultimate sub-section in relation to the infrastructure needed to provide accessible employment locations.

#### *Boost pride in Medway through quality and resilient development*

~ To ensure that development is supported by the timely provision of good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served.

~ To deliver sustainable development, meeting the needs of Medway's communities, respecting the natural and historic environment, and directing growth to the most suitable locations that can enhance Medway's economic, social and environmental characteristics.

~ To secure the ongoing benefits of Medway's regeneration, making the best use of brownfield land, and bringing forward the transformation of the waterfront and town centre sites for high quality mixed use development, and a focus for cultural activities.

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~ To lift the standards of sustainability and quality in all new development; respond positively to the character and variation of local places across Medway; seeking opportunities for greener construction, to provide for more energy efficient buildings which drives down their carbon impact; demonstrate distinctiveness; and improve the accessibility and design of the public realm that will help people to live healthier lives and open up travel choices, reducing car dependency.

**# Railfuture response:** We endorse the above objective and in particular its first two sub-sections in relation to transport infrastructure to support sustainable development.

## **5 Developing a Spatial Strategy**

### *Development needs*

5.1 The Local Plan will include a Policies Map, which will show how land is allocated for new development, such as housing and employment, and where land is protected, such as environmental designations for nature and landscape. The Policies Map and Key Diagram help to communicate Medway's spatial strategy – how we are planning for the future.

5.2 A Local Plan should be positively prepared for sustainable development. It should not be used to stop development that is needed for our growing and changing communities. The Plan should seek to direct and manage growth, so that it provides land for homes, jobs and services, as well as protecting the area's natural resources and historic features.

5.3 Government directs Local Planning Authorities to use its 'Standard Method' in determining the scale of housing needed over the plan period. This Standard Method formula for Local Housing Need identifies a need for 1,667 homes a year in Medway, or around 28,500 over the plan period to 2040. This level of housing need is greatly higher than rates of housebuilding seen in Medway for over 30 years. The formula reflects dated demographic projections and has been heavily criticised across the country and there is currently some uncertainty with Government policy. At the time of writing, the Government had not yet published its response to the consultation on revisions to the National Planning Policy Framework, which included consideration of the Standard Method formula.

5.4 The Council has raised concerns in Government consultations about the Standard Method. A key matter for Medway is the marked variation in levels of housing needs generated by the Standard Method based on projections from 2014, in comparison to use of more recent demographic projections for Medway's growth. This matter was considered in the Medway Housing and Demographics report supporting the Local Housing Needs Assessment published in 2021, and is illustrated in Figure 1 below, which is an extract from the report. The dwelling-led Standard Method scenario is clearly significantly higher than use of other approaches to forecasts. The Government considers that this method is appropriate to meet its house-building ambitions to tackle pressures in the housing market. Notwithstanding the concerns regarding the methodology, it has to be recognised that there is a housing crisis, particularly regarding affordability and there is an absolute need to provide the right homes in the right places to meet Medway's growing needs and the requirements for those desperately needing a good quality home. There are many existing residents in Medway living in over-crowded and/or substandard conditions which is unhealthy or living at home with parents well into their late-30's because they simply cannot afford to live independently in the area they wish to continue to live.

5.5 The Council will be reviewing the outcomes of Government consultations and anticipated policy updates in preparing the draft Local Plan for publication next year.

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5.6 The Council is collating a comprehensive evidence base to inform the new Plan. All potential sites will be assessed for their ability to deliver sustainable development, considering constraints and mitigations, and how they could meet the objectives of the Sustainability Appraisal and objectives for the Plan. The Council needs to demonstrate that the growth strategy set out in the Plan can be delivered, to provide certainty and confidence in Medway's growth. Potential sites and locations will be tested against a range of criteria, including transport impacts and viability.

**# Railfuture response:** We welcome the explicit reference to transport impacts as a test criterion.

5.7 Work to date has highlighted some critical constraints. National Highways has indicated that there is insufficient capacity in parts of the Strategic Road Network to accommodate significant growth. National Highways has identified capacity and safety concerns with M2 Junction 1. Although this is outside of Medway's boundary, it is a key junction for the area, and many residents and workers travel through this junction regularly. There are no plans to upgrade this junction as part of National Highway's plans for the Lower Thames Crossing (LTC). Without a clear scheme in place to address these issues, development of jobs and homes across north and mid-Kent will be stymied. The Council is working with neighbouring authorities and wider stakeholders to prioritise action on M2 Junction 1. This matter would need to be addressed in the Local Plan, with policies showing how impacts could be mitigated and improvements delivered.

5.8 In addition to this current issue, further transport impacts are expected with the development of the LTC. The LTC is focused on a defined scheme for its primary route and tunnel. The scheme does not provide for improvements that may be needed to parts of the surrounding roads network that would be impacted as a result of the new crossing. The new crossing is forecast to generate new trips, as well as re-routing existing journeys, as drivers divert from Dartford.

5.9 This is a particular concern for Medway, as the modelling assumptions used in planning for the LTC underestimate the amount of development growth that would be expected in the new Local Plan. There are concerns that the road network will not have the capacity to accommodate the higher levels of homes and jobs planned in Medway. This raises uncertainty for the capacity of the highway network to meet the full scale of development needs over the plan period. This could be a strategic constraint to development and the Plan would need to reflect lower levels of growth in Medway, with the consequent impact on delivery of new jobs and homes to Medway's need and related affordability of homes.

5.10 Further consideration will be given to potential impacts on the environment, especially the designated habitats and landscapes which form a large part of Medway's area, and strategic infrastructure needs. The Council will need to assess how negative impacts can be avoided, or mitigated, such as through delivery of new services.

5.11 In addition to assessing how to meet Medway's needs for 28,500 new homes over the Plan period, the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham's housing needs, following a request from the neighbouring borough.

**# Railfuture response:** We take serious note of paragraphs 5.7 - 5.11 and observe that additional transport and especially public transport capacity will be required if Medway's legitimate growth aspirations are not to be thwarted. While no panacea, we contend that additional rail capacity and necessary infrastructure must form a vital part of that equation.

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### *Potential land supply for development*

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

5.13 There is an existing 'pipeline' of sites with planning permission for over 7,500 homes, not yet built, which contribute towards meeting the total need in the Plan. Authorities can also make allowance for 'windfall sites' – those that come forward for development outside of Local Plan allocations. Taking account of these two sources of supply, the Council is assessing options to make provision for site allocations for over 19,000 homes to meet needs in Medway.

5.14 This is a high level of need and the Council has carried out a comprehensive and iterative review of potential sources of land for development allocations. The Council has produced a Land Availability Assessment (LAA) to be published with this consultation document. The LAA has been informed by a Call for Sites, where the Council invited developers, landowners and other parties to put forward sites for consideration as potential development allocations. Planning officers also identified sites from other sources, such as development briefs, the Brownfield Land Register and withdrawn planning applications. An initial high-level assessment has screened out sites that are too small. Further work will consider the scope for overcoming constraints to achieve sustainable development.

5.15 The LAA has identified land with the potential capacity for c 38,200 homes, which will proceed to the next stage of detailed assessment, along with the Sustainability Appraisal process. Many of these sites are subject to constraints, including environmental considerations, infrastructure requirements and viability. It is likely that many of these sites will not be found suitable, available and achievable for sustainable development and will be removed at the next stage of assessment and Sustainability Appraisal. A range of mitigation measures will be required to achieve the scale of housing needed for the Plan. The scale of proposed growth is anticipated to have significant impacts across Medway. This level of housebuilding would mean the transformation of urban centre and waterfront areas and large-scale development in suburban and rural areas.

5.16 The Council has identified four broad categories of locations where development could take place, reflecting Medway's geography. Indicative housing capacities from the LAA for the different areas are presented for each category (Note, this is NOT allocating numbers to allocated sites but merely reflects the LAA)

5.17 These broad locations are considered in more detail below.

### *Urban Regeneration*

Sites with the potential for urban regeneration could provide the capacity for 11,151 homes.

5.18 Medway has been successful in transforming its urban waterfront and centres in recent decades, with areas such as St Mary's Island, Chatham Waters, Victory Pier and Rochester Riverside. The Council has been leading on Medway's regeneration, setting out strategies to realise new opportunities, securing millions in external funding, preparing land for redevelopment, and working closely with partners and developers to deliver change. The Council is also identifying where it has underused sites that could make better use of brownfield land for new development, and is bringing forward new homes and business space in areas such as Chatham Waterfront. This commitment to urban regeneration continues to form an intrinsic part of our strategy for Medway's growth in coming years.

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5.19 The new Local Plan will draw on the existing policies, strategies and programmes that promote the regeneration of Medway's urban centres and waterfront. This work creates a supportive policy environment for redevelopment in these areas. In drawing up the growth strategy for the new Plan, the Council's starting point is regeneration and making the best use of vacant or under-utilised brownfield land. Sites which are already identified in Council documents such as the town centre masterplans for Chatham, Gillingham and Strood, and development briefs for Strood Waterfront, are likely to be included as site allocations in the new Local Plan. Such sites could deliver thousands of homes, as well as commercial floorspace for businesses and services and contribute to our wider strategies for supporting our high streets and centres in adapting to wider changes in retail patterns.

5.20 The regeneration opportunities vary across Medway's urban area, reflecting the different characteristics of our towns. Some sites offer the potential for taller buildings and a modern urban character; other sites are more sensitive to the historic surroundings and their environmental setting. The Council recognises the distinctive and varied character of Medway. Urban regeneration does not mean a standard approach to density and design, but consideration of the most appropriate approach in different areas. The Council's work on the Chatham Design Code is assessing in detail how new development would best fit with the centre's heritage, landscape and infrastructure. It will provide guidance on building heights and massing, design of public spaces and transport links to ensure that redevelopment in central Chatham optimises the potential of the area. Similarly, the Chatham Intra Development Framework takes a heritage-led approach to managing potential change, reflecting the area's special character and historic significance. If such areas are to provide new homes, workspaces and services, it is critical that people and the environment are at the centre of plans – with green spaces, sustainable design, play areas, and places to rest and socialise. The Plan must promote a coherent strategy that looks at managing change to create an attractive and sustainable place for people to live, work and visit.

5.21 In addition to these sites, the Council is also considering the potential for wider development in urban waterfronts. Land has been promoted for redevelopment at Chatham Docks and Medway City Estate. These large sites could provide for new homes as well as workspace for businesses and services. Such major redevelopment would have a marked impact on the area and would involve the relocation of existing businesses.

#### Opportunities

5.22 The central urban areas benefit from good public transport links, existing services and businesses, universities and colleges and major visitor attractions. These offer sustainable locations for new development, in line with national planning policy. There are underused and vacant sites, reflecting changes in work and retail patterns over a number of years. These locations have the potential for higher density development, making the best use of previously developed land. The accessibility of town centre sites can offer attractive living environments for a wider range of people. Town centre regeneration is not limited to flats for younger people but has the potential to meet the needs of older people and families. The plan will need to reflect the needs of wider communities in shaping policies and allocations for central areas.

5.23 Vacant units on the High Street could be redeveloped with space for businesses and community services on the ground floor, with new homes on higher floors. As businesses, particularly office-based activities, look at new models of working, town centre sites could have an important role in diversifying our employment land offer.

#### Issues and Constraints

5.24 The continued success of urban regeneration in Medway will involve directing new homes to locations where everyday needs can be met; these locations are already – or

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could be – well-served by public transport for medium and long-distance journeys. If we do not achieve meaningful shifts in how people travel, the centres and surrounding roads will be subject to further congestion, with associated air quality and amenity issues, and development will be constrained by levels of car parking.

5.25 The waterfront is an important area for nature and much of the river in central Medway is a designated Marine Conservation Zone. This means that the impacts of development, such as light, noise and other disturbance on the river may need to be considered. As a coastal authority, Medway is also subject to the impacts of rising sea levels with climate change. This is a particular consideration in planning for the redevelopment of waterfront sites, and the need to futureproof buildings. Much of Medway's noted heritage is located in the central urban areas, such as the Chatham Historic Dockyard and its defences, and Rochester Castle and Cathedral. New development must be sensitive to the historic significance of its surroundings.

5.26 Sites considered in this development involve the redevelopment of brownfield sites, sometimes with demolition, conversion or land decontamination required. Development of such sites tends to have higher costs for these reasons, and this can affect viability, meaning that the sites are not attractive to the market, or lower quality schemes are built. The Council is testing the viability of sites through its work on the Local Plan and will consider how policy can encourage redevelopment in these areas. Some sites identified for potential allocations in the new Plan have not been proposed by landowners or developers, but from the Council's work in assessing land availability and development briefs. The Council will seek to engage with the development sector to encourage them to consider promoting their sites.

5.27 There are key opportunities for urban regeneration and potential for thousands of new homes. It will be important to ensure that homes are supported by services, including new schools and health facilities. Planning for major redevelopment must be for sustainable development.

5.28 There are sites promoted for development in urban areas which would involve significant changes to employment land at Chatham Docks and Medway City Estate. These raise issues on the possible re-location of existing businesses, as well as the types of new businesses that may be attracted to the areas. Conflict with surrounding land uses is also a key matter, particularly where residential areas may be coming forward next to busy employment sites. A strategic and comprehensive approach is critical to avoid piecemeal development that may not provide good living standards and could create tension with surrounding land uses.

**# Railfuture response:** We note that many of the more significant Urban Regeneration sites are not particularly conveniently located for ready access to Medway's existing mainline rail stations, and will therefore be heavily dependent on a high quality public realm through which to walk and cycle to and from those stations and on high quality bus service links.

### *Suburban Expansion*

Sites with the potential for suburban expansion could provide the capacity for 9,680 homes.

5.29 This category considers the areas for potential growth adjoining the existing urban areas to the south and east of Medway. These are largely located to the north and east of Rainham and in the Capstone and Hempstead area to the south. The existing suburban neighbourhoods are home to many of Medway's residents, and key services and employment areas. The undeveloped land around the suburbs is valued as a contrast to the large urban conurbation, providing important green lungs within an otherwise dense urban

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area and includes the popular country parks at Capstone and Riverside. Historically these areas have been important for farming, such as the north Kent fruit belt, from which the county gets its recognition as the Garden of England. There are key landscape links to the estuary in the north and the Kent Downs to the south. Car ownership rates are higher in this part of Medway, and there are congestion hotspots on the highways network, particularly along the A2.

#### Opportunities

5.30 The large towns and neighbourhoods in the south and east of Medway are popular places for people to live. Developers are actively promoting land in this area through the Local Plan and planning applications. Development on the green field sites in this category would be expected to be built out quickly, responding to market demand and more limited site constraints than brownfield sites.

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.

#### Issues and Constraints

5.32 Much of the land around the north and east of Rainham is the best and most versatile farmland, although many fields are not in active agriculture use. The area to the south is within the setting of the Kent Downs Area of Outstanding Natural Beauty, and undeveloped land forms an important component of our green infrastructure networks. The area to the north lies close to the Medway Estuary, which is designated a Special Protection Area, Ramsar site and Site of Special Scientific Interest, recognising its international and national importance for wildlife.

5.33 The A2 is an important transport corridor, but experiences congestion and has been designated an Air Quality Management Area. There is a risk that major development in these suburban locations could generate further dependencies on car-based travel, adding to congestion and pollution, and undermining Medway's ambitions for sustainable development. Much of the potential development south of the M2 is anticipated to travel towards the M2 via junction 4 which may need to be improved to accommodate additional traffic.

5.34 Although potential sites could be developed in proximity to existing towns and neighbourhoods, there is not sufficient capacity in existing services, such as schools and health services, to cater for an increased population. New housing would need to make provision for expanded and new services. Similarly, schemes that focus on homes and not jobs and services could result in unsustainable development and increase people's need to travel.

5.35 Land in this area lies close to Medway's boundary with neighbouring authorities, particularly Swale and Maidstone. Development in these locations would potentially have a cross-border impact. Development to the east of Rainham would erode the strategic gap between Rainham and Newington and add further to the congestion and pollution issues on the A2. Development to the south around the Capstone Valley would potentially adjoin the development of the proposed 'Lidsing Garden Community' in Maidstone. The landowner is promoting a cross-border masterplan. There are a number of potential impacts, including transport, infrastructure and the natural environment.

### **Medway Local Plan 2040**

# Railfuture response: We note that even for those Suburban Expansion sites nearest to Rainham station, and even more so for the other sites further afield, the challenge of offering new residents ready access to mainline rail services will be very heavily dependent on the availability of high quality bus service links.

### *Rural Development*

Sites with the potential for development in the rural areas could provide capacity for 14,736 homes.

5.36 Although Medway is largely an urban authority by population, the majority of its land is rural. Much of the countryside is on the Hoo Peninsula to the north of the borough, as well as the Medway Valley to the south west. Rural Medway is markedly different in character to the urban towns and neighbourhoods. The villages in the Medway Valley sit within the setting of the Kent Downs and the river. The Hoo Peninsula sits between the Thames and Medway estuaries. Much of the periphery of the peninsula is designated as Special Protection Areas (SPAs) and Ramsar sites, recognising its international importance for nature, particularly migrating birds. There are further Sites of Special Scientific Interest (SSSI) across the peninsula, which are of national importance. The coastal marshes and mudflats and areas of woodland shape the distinctive character and feel of the peninsula. These landscapes are valued for their sense of place and remoteness, all the more special, given their proximity to urban Medway.

5.37 The peninsula includes areas of the best and most versatile land for agriculture, and there is a strong farming presence. However, the area is also characterised by wider industries, particularly the legacy of the energy sector at Grain and Kingsnorth. These two large brownfield sites form an important part of Medway's employment land supply and offer unique opportunities for further jobs growth such as realising opportunities for green technology as the country moves to zero-carbon.

5.38 There are a number of villages on the peninsula, with the largest being Hoo St Werburgh. Hoo has a population of over 10,000 people and provides services, such as schools and sports facilities to the wider villages on the peninsula. However, many residents travel off the peninsula to reach workplaces, shops and other services. There are high levels of car ownership and public transport services are limited in a number of areas.

5.39 The vast majority of sites that have been put forward for potential development in rural Medway (outside of the Green Belt designation) are on the Hoo Peninsula. Most of the sites are promoted for housing led development, with the exception of the larger employment sites. It is noted that many of the sites promoted for development on the Hoo Peninsula are large scale, each potentially providing land for hundreds of homes.

### *Opportunities*

5.40 There is significant land for potential development for homes, jobs and services on the Hoo Peninsula. The Council has recognised this potential through its work on the Local Plan, and considering options for how Medway can grow in the future. The Council has considered the potential for large scale growth on the peninsula through its work on the draft Hoo Development Framework which was published for consultation in 2022. The Housing Infrastructure Fund (HIF) programme sought to deliver improvements to transport and put measures in place to strengthen the local environment. These would provide certainty in planning for future development in the area, and in assessing sites across Medway in the context of constraints and possible mitigations in preparing the Local Plan.

5.41 In the absence of the HIF funding programme, the opportunities and issues still remain key considerations in the preparation of the new Local Plan. Large scale development around Hoo St Werburgh and neighbouring villages could provide for planned growth, where new housing is supported by new and improved services and infrastructure. Such development could also help to meet the Council's ambitions for greener growth, with higher environmental standards in construction, communities better connected for walking and cycling, and within easy reach of local services.

5.42 The peninsula also has a key role in Medway's economic development strategy, with major sites at Grain and Kingsnorth offering potential for new employment sectors and being regional hubs in energy and green technology industries, contributing to de-carbonisation of the economy. The area's environment also offers opportunities to develop green tourism, based on assets such as the estuaries and the spectacular shows of birdlife. Agriculture will continue to be an important land use for the peninsula.

#### Issues and constraints

5.43 The Hoo Peninsula has significant potential for further development, as part of Medway's wider growth in coming decades. This is shown in the extensive number of sites promoted for development on the peninsula, and the scale of potential sites. However, there are a number of specific considerations for development on the peninsula.

5.44 The area's special and distinctive environment is a primary consideration. The Local Plan will set out a strategy, not just for development, but also for strengthening our green infrastructure networks and sites. Biodiversity, landscape, and water management are just some of the key matters in environmental planning. The Council will assess the potential impacts of possible development sites on different aspects of the natural environment, with specific attention to the designated areas, such as SSSIs and the SPAs.

5.45 A further strategic consideration is the capacity of infrastructure to support major growth on the Hoo Peninsula. Transport networks would need to be upgraded. The roads network is limited, with particular concerns on the capacity of Four Elms roundabout and congestion on the adjoining roads, which exacerbates air pollution. Bus services reflect the rural nature of the area, with reduced frequency compared to urban Medway. The Council will require major transport schemes to provide for sustainable transport choice and increase the capacity of the road network, to facilitate growth on the Hoo Peninsula.

5.46 Similarly wider investment is required in wider services, such as schools and health and leisure facilities, to support larger communities, as the existing infrastructure reflects the area's rural character and villages. Large scale growth would need careful planning for phasing and design to provide for sustainable development.

**# Railfuture response:** We broadly endorse the approach outlined in paragraphs 5.36-5.46. We note that these sites comprise almost 40% of the total potential housing capacity identified but are currently un-served by an increasingly well-used but, from December 1961, freight-only railway line. The award of £170m from the Housing Infrastructure Fund in November 2019, with £67m of that identified for upgrading the existing line for passenger services as far as a new station at Hoo St. Werburgh was, in our view and despite the abandonment of the project in July 2023, formal recognition of the strategic case for the additional public transport capacity mentioned after paragraph 5.11. We commend an innovative financing model known as Land Value Capture as a tool to re-ignite the essential rail development project. It has been pioneered successfully on the Northumberland Line, another freight-only line which lost its passenger services in July 1964, now nearing completion of its 18-mile upgrade with six new stations for new passenger services supported by c.30% financing through Land Value Capture – which operates independently

#### **Medway Local Plan 2040**



from developer contributions via Section 106 and Community Infrastructure Levy funding. It is in our view critically important to avoid an over-reliance on highway-based infrastructure interventions to provide the additional capacity required to meet new travel demand if the new Local Plan's worthy objectives, which we support, are not to be materially undermined at the point of project delivery.

### *Green Belt Release*

Sites with the potential for development in the Green Belt could provide the capacity for 2649 homes.

5.47 There is a common confusion with the technical jargon used in Planning between Green Belt and greenfield land. Green Belt is a specific policy designation around major cities. Greenfield is used to refer to undeveloped land, like fields, in contrast to brownfield sites, which have previously been developed. National planning policy attaches great weight to Green Belt policy which places limits on development. Greenfield sites do not have the same level of protection in national planning policy.

5.48 Land in the west of Medway forms part of the Green Belt around London. The Metropolitan Green Belt aims to stop the outward growth of Greater London into the surrounding countryside, towns and villages. National planning policy states that the principal aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open.

5.49 Just under 5% of land in Medway is designated as Green Belt. These areas adjoin Green Belt land in Gravesham and Tonbridge and Malling. Both of these boroughs have significantly higher proportions of land covered by the Green Belt designation. As well as preventing the outward expansion of London, at a more local level, the Green Belt prevents coalescence of towns and villages. It provides a strategic gap between Strood and Higham, and between Snodland and Halling. The Council has carried out a review of land in Medway in the Green Belt, which shows that the purposes of the policy are being met.

5.50 There is a strong presumption in national planning policy that Councils should seek to protect the Green Belt from development, and where needing to allocate land for growth, sites outside of the Green Belt should be considered in preference to Green Belt release.

### *Opportunities*

5.51 In the context of high levels of housing need across Medway and neighbouring boroughs, Councils are looking at all options for how they can provide for sufficient homes in their Local Plans. The boroughs of Gravesham and Tonbridge and Malling both have high levels of land covered by the Green Belt designation. The Lower Thames Crossing is proposed to the east of Gravesend and this will involve significant change in the area between Gravesend and Strood. This context of major infrastructure investment needs to be considered in reviewing potential release of land in the Green Belt. In work on its emerging Local Plan, Gravesham Borough Council has identified a potential development allocation immediately to the west of Medway, near Strood. This would significantly narrow the Green Belt land in this location, and impact on the function of the remaining Green Belt land adjoining Strood in Medway. Developers are promoting separate sites in both Medway and Gravesham for Green Belt release. Development in Medway could provide for a limited number of homes, in proximity to transport networks and services in Strood.

5.52 A larger area of land in the Medway Valley across the borough boundaries of Medway and Tonbridge and Malling is being promoted through the Councils' respective Local Plans. This could form a cross-border strategic development, or separate allocations in

## **Medway Local Plan 2040**

the two Council areas. Development at this scale would provide for new services, including schools, as well as homes.

#### Issues and Constraints

5.53 In addition to the strong policy presumption against development in the Green Belt, much of the land in Medway's part of the Green Belt is also part of the Kent Downs Area of Outstanding Natural Beauty (AONB). The AONB designation and its setting is also afforded significant weight in national planning policy to protect land from major development. The potential cross-border proposal in the Medway Valley would have significant impacts on the AONB. The Council would be expected to evidence a case for development in such a location and how landscape impacts could be mitigated.

5.54 Both sites are located close to major transport corridors, which already carry high levels of traffic, and are forecast to be impacted by the LTC. There are queries as to the capacity of such sites to accommodate travel needs and to provide for sustainable transport options.

# Railfuture response: We share the concerns alluded to in the closing sentence of paragraph 5.54.

#### *Employment sites*

5.55 A sustainable development strategy provides for homes, jobs and services. Housing sites in the strategy tend to attract the greatest interest, but it is important to draw up a balanced plan for Medway. This includes setting out our plan for boosting jobs and supporting businesses to expand, start up, or be relocated in and to Medway. The choice and quality of sites available to businesses is critical to our economic development strategy.

5.56 The main employment areas are currently spread across Medway, reflecting historic patterns and the geography of separate towns and villages. Businesses also orientate to sites that meet their needs for access, space, connectivity and services, and in some cases, proximity to linked businesses.

5.56 The plan is to consider the need for more employment floorspace for businesses. The Medway Employment Land Assessment, 2020 indicated a need for c 62.3 hectares of employment land up to 2037. The majority of the land would be needed for warehousing and distribution activities.

#### Opportunities

5.57 A number of sites are being considered through the Land Availability Assessment for employment allocations in the new Local Plan. These include the strategic sites at Grain and Kingsnorth on the Hoo Peninsula, with unique opportunities in specialist sectors, such as energy and green technology, and making use of wharfage facilities.

5.58 The Innovation Park Medway seeks to provide high quality business space that continue to build Medway's profile for high value jobs and sectors.

5.59 The diverse sites provide space for very different industries, allowing Medway to attract inward investment and meet the needs for businesses to grow locally.

#### Issues and Constraints

5.60 Transport infrastructure is again a key consideration with employment land. Plans to expand business uses may be challenged by limited capacity on roads, and poor public

transport connections. There are specific issues with the Strategic Road Network as highlighted above.

5.61 In addition, there are impacts on local roads, particularly where businesses involve warehousing and distribution uses.

5.62 The Council will need to carefully consider the impacts of employment land proposals to provide direction on the capacity of transport networks and the requirements for sustainable travel options.

# Railfuture response: A commitment to re-ignite the Hoo Peninsula Railway development project as we have advocated after paragraph 5.46 would, in our view, afford the opportunity to improve the freight service offer for the Employment Sites identified and thereby maximise the value and benefits to be derived from that rail transport infrastructure investment. It is especially important to avoid an over-reliance on highway-based infrastructure interventions to provide the additional capacity required to meet new freight traffic demand in view of the more polluting and environmentally-damaging impacts of HGVs. The potential of third-party funding through Land Value Capture contributing to meeting 30% or more of project costs opens up the additional possibility of wholly new infrastructure in neighbouring Gravesham District both to enable more efficient freight operations avoiding Hoo Sidings and also much-improved connectivity for new rail passengers with direct links to the Medway Towns and potentially beyond, each supporting environmentally-beneficial mode shift to rail.

Yours faithfully,

Roger Blake BA, MRTPI (Rtd), MTPS  
Railfuture  
Vice-Chairman, London & South East regional branch  
Director for Infrastructure & Networks, national Board

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

**Date:** 31 October 2023

**Our ref:** 13786/01/SSL/SFu/27147422v2

Dear Sir/Madam

## **Representations on behalf of the Church Commissioners for England ('CCE') to Medway Local Plan Regulation 18 Consultation – Setting the Direction for Medway 2040, September 2023**

On behalf of our client, the Church Commissioners for England ('CCE'), we write to provide formal representations to the above consultation into the emerging Medway Local Plan, which runs until 31 October 2023. For completeness, a copy of these representations, without the attachments, has also been submitted via Medway's online consultation form.

CCE manage the historic property assets of the Church for England. Their Strategic Land Portfolio currently covers approximately 7,600 acres across England with local plan allocations or planning permission for circa 30,000 new homes (of which circa 9,000 homes would be affordable), and circa 7 million sq ft of employment floorspace. CCE's approach to strategic land is to seek to build new, and strengthen existing, communities helping to create and sustain vibrant places. The importance of high-quality placemaking and thorough engagement with local authorities, stakeholders and communities is at the heart of this approach.

CCE have significant landholdings on the Hoo Peninsula, including land to the east of Hoo St Werburgh and at Kingsnorth. CCE's land to the east and west of Ropers Lane at Hoo comprises part of the wider area of land identified as having the potential to grow by up to 10,000 new homes over the next thirty years, as published most recently in the Council's draft Hoo Development Framework which was published for consultation in 2022. The land at Kingsnorth further provides the opportunity for sustainable development of employment land.

CCE are part of the Hoo Rural Town Consortium. For the purpose of this consultation, CCE are relying on the representations submitted by Stantec, on behalf of the full Consortium which sets out and supports the Consortium's shared vision and response to the consultation.

CCE also own landholdings at All Hallows and Lower Stoke, and some relatively smaller rural landholdings at Mackays Court Farm (Middle Stoke), Land at the Street (Stoke), Sharnal Street and

Burney's and Nord Court Farm. These are referred to in the 'other rural landholdings' section of this representation below.

These sites, with the exception of Burney's and Nord Court Farm, were submitted to the call for sites process (submission references 294, 295, 298, 299, 300, 301, 302 and 304) undertaken by the Council in February 2023, to assist Medway in the preparation of its new Local Plan. The submissions confirmed the sites are suitable, available and achievable and therefore deliverable. The potential development areas are shown on the site plans at Annex 1.

CCE welcome the opportunity to be involved in this Regulation 18 consultation. The Regulation 18 document does not detail policies or identify those sites preferred by the Council for development, but considers why there is a need to plan for Medway's growth, proposes strategic objectives and sets out options for developing a spatial strategy to meet growth.

In overall terms, CCE consider that the Medway Local Plan, which will set land use policy up to 2040, needs to be ambitious, yet fully deliverable. It needs to ensure that the housing needs of the Borough can be met with clear guidance as to the most appropriate and sustainable sites to accommodate the required housing and economic needs.

These representations, address matters specifically affecting their landholdings, including the land at the Hoo Peninsula and Kingsnorth.

## **Vision and Strategic Objectives**

Overall, CCE support the vision and strategic objectives set out in the consultation document. In particular *'to provide for high quality energy efficient homes that meet the housing needs of Medway's communities reflecting the range of sizes, types and affordability the area needs'* alongside *'the provision of a portfolio of good quality employment land'*. The objectives also, importantly, recognise development should be of high quality, resilient and supported by the timely provision of infrastructure to facilitate a sustainable and green future. CCE support the intention to deliver sustainable development, meeting the needs of Medway's communities whilst respecting the natural and historic environment and directing growth to the most suitable locations.

The Council may need to consider extending the plan period beyond 2040, noting the intention is to adopt the Plan at the earliest in 2025 and the NPPF (2023), paragraph 22, states that strategic policies should look ahead over a minimum 15-year period from adoption.

## **Housing Need**

The consultation document refers to the Government's standard methodology for housing need formula which identifies a need for 1,667 homes a year in Medway, or around 28,500 homes over the plan period to 2040. The National Planning Policy Framework (NPPF) requires the use of the standard method for calculating housing needs and Planning Practice Guidance (PPG) requires use of the Office of National Statistics (ONS) Household Growth Projection data from 2014. The government made it clear in its recent consultation on proposed changes to the NPPF that it will not be amending the standard methodology to utilise 2018 data. Medway should therefore continue to base its housing need calculations using the established methodology, until such time as any updated or amended methodology is published by the government.



CCE support the recognition in the consultation document that there is a housing crisis, particularly regarding affordability and there is an absolute need to provide the right homes in the right places to meet Medway's growing needs. CCE support paragraph 5.11 and 5.12 of the document which align with the NPPF and recognise the need to (a) consider if there is capacity to provide homes to help meet Gravesham's unmet needs and (b) adding a buffer to supply, equating to a need to plan for 29,000 homes over the plan period.

Planning to meet full housing needs will also provide growth benefits for existing communities in Medway. This is acknowledged within NPPF paragraph 79 which states that to support sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

## **Developing a Spatial Strategy – Rural Development Sites**

### **Hoo Peninsula – Hoo Rural Town**

CCE recognise that, in meeting the identified housing requirement, the Council should look to bring forward urban sites and previously developed land. However, it is also noted that such sites are often costly to bring forward and can take time to become available to deliver the required housing. Urban sites are also often more suited to flatted developments delivering smaller units which only caters to a small element of housing need locally. These considerations, coupled with Medway's significant housing need will require the identification and release of less constrained greenfield sites.

To achieve its vision, CCE consider that the Local Plan needs to be ambitious, yet fully deliverable. It needs to ensure that the housing and employment needs of the Borough can be delivered with clear guidance as to the most appropriate and sustainable sites to accommodate the required housing and employment. In doing so, the Council will need to take a pragmatic approach to a range of development options. In this regard, CCE fully supports the proposals in the draft Hoo Development Framework (2022) for significant growth at Hoo St Werburgh and subsequently, the Council identifying this land as a potential broad location for development in the consultation document (Map 3).

The Hoo Rural Town offers the opportunity to provide a sustainable new community in its own right, with high quality supporting infrastructure. The expansion of Hoo St Werburgh and the surrounding villages offers new opportunities and many potential benefits to the area and Medway as a whole. There is potential for the area to grow by c. 10,000 homes over the next thirty years. New development would be planned to improve travel choice and reduce the need to drive with an attractive and comprehensive cycling and pedestrian network. People will be able to use an expanded range of local services and facilities close to home. There will be new schools and health facilities, shops, businesses, leisure and community services. It would provide growth that meets people's needs for homes, jobs and services, whilst respecting the natural and historic environment.

The support for these proposals is clearly set out in the submission by Stantec prepared for the Consortium, including CCE. As noted above, these representations will not repeat or seek to reiterate the commentary prepared by Stantec on behalf of the Consortium in relation to the land at Hoo St Werburgh.

CCE own land east (call for sites submission ID 299, SHLAA ref. HHH31) and west (call for sites submission ID 300, SHLAA ref HHH22) of Ropers Lane which could accommodate around 3,500 new homes alongside supporting social infrastructure. The site presents an opportunity for a sustainable extension to the east of the existing settlement of Hoo St Werburgh and should be considered as part of the wider Hoo St Werburgh Rural Town, which provides the opportunity to deliver a highly sustainable community securing significant housing growth supported by infrastructure; employment opportunities; services and facilities as well as environmental enhancements. It also provides new links and connections to the proposed and existing employment areas at Kingsnorth.

This representation therefore confirms that land within CCE's ownership at the Hoo Peninsula should be identified to assist in meeting the housing requirements and development needs of the Borough.

In this context, and as set out in the February 2023 call for sites submissions, CCE have commissioned the following initial surveys: Ecological Assessment, prepared by Ecology Solutions (January 2023); Agricultural Land Classification report, prepared by Strutt and Parker, January 2023; Heritage Assessment (above and below ground), prepared by Terrance O Rourke, (January 2023); Landscape and Visual Appraisal, prepared by Terrance O Rourke (March 2023); and, Utilities consultation note, prepared by Pell Frischmann (September 2020). Pell Frischmann are also appointed to provide technical advice to CCE on Highways and Flooding. The surveys confirm that there would be no overriding constraints to the development of land within CCE's ownership at the Hoo Peninsula. Further technical assessment as required would be instructed by CCE as part of any future planning application, to inform future development proposals.

### **Other Rural landholdings**

CCE appointed masterplanners to undertake initial feasibility studies for the smaller rural settlements, all submitted to Medway's February 2023 call for sites process. The initial findings demonstrate that, taking into account the sites and their individual opportunities and constraints, the following sites could be suitable for development, including for residential use:

- 1 **Land West of Allhallows** (call for sites submission ID 294, SHLAA ref. AS21) - the site presents an opportunity for a sustainable extension to the existing Allhallows settlement. As the site is sustainable and accessible with no overriding constraints, we consider that there is scope for mixed use development including residential of up to 390 dwellings, tourism and leisure uses, open space and associated infrastructure. Development of this site would, therefore, represent a sustainable residential extension to the existing Allhallows settlement to support the existing primary school, local shops and doctor's surgery.
- 2 **Lower Stoke** (call for sites submission ID 295, SHLAA ref. AS13) - the site presents an opportunity for a sustainable residential extension comprising around 655 dwellings to the west of the existing settlement, either side of Cuckolds Green Road, to support local shops and services. Depending on the scale of development, social infrastructure could be provided, but this would be dependent on the wider strategy for the surrounding Hoo Peninsula area. As the site is sustainable and accessible with no overriding constraints, there is scope for residential-led mixed-use development and open space.
- 3 **Mackays Court Farm (Middle Stoke)** (call for sites submission ID 302, SHLAA ref. AS16), **Land at the Street (Stoke)** (call for sites submission ID 301, SHLAA ref. AS11) **and Land at**

**Sharnal Street** (call for sites submission ID 304, SHLAA ref. HHH28) – these three sites are sustainable and accessible, with no overriding constraints. It is considered that these sites present the opportunity for small scale residential development to diversify and strengthen the Local Plan’s housing trajectory, which should appropriately be made up of a range of large strategic sites (such as the Hoo Rural Town), and smaller sites.

- 4 **Burney’s and Nord Court Farm** - the site totals approximately 0.25 hectares and is located to the west of Stoke Road. CCE previously submitted a pre-application request in May 2023 (ref. PRE/23/1196). The Council concluded that the site could be suitable for residential development given its location on the edge of the village of Lower Stoke. The site is located in a sustainable location and is well related to the village of Lower Stoke which is served by a primary school, a GP Surgery, a church, a convenience store, a pub as well as a Post Office. A Site Location Plan is appended.

This representation therefore confirms that land within CCE’s ownership is suitable, available and achievable and could be identified to assist in meeting the housing requirements and development needs of the Borough. CCE support that these sites are all identified by Medway on Map 3 ‘potential rural development sites’ in the consultation document. CCE would be happy to engage with officers to discuss these sites and any required assessment work, masterplanning, infrastructure requirement analysis and phasing – which would be in the later stages of the Local Plan period.

In addition, CCE would also welcome the retention of a Policy in the Local Plan supporting the re-use of buildings in the countryside, similar to adopted Policy BNE27. However, it is recommended that existing criteria (vi)(a) which requests that applicants demonstrate ‘*every reasonable attempt has been made, without success, to secure a sustainable business reuse for that property*’ should be removed. Paragraph 152 of the NPPF states that the reuse of existing resources should be encouraged, including ‘*the conversion of existing buildings*’. Under paragraph 152, there is no prerequisite to adopt a sequential approach or to give preference to other uses. Furthermore, paragraph 80c of the NPPF is supportive of the reuse of redundant or disused buildings for residential use. Many of CCE’s rural landholdings above include agricultural buildings appropriate for conversion, which could assist the Council with meeting its identified housing needs in a varied way alongside larger strategic allocated sites.

## **Phasing**

Delivery of the above sites could be achieved by first (in the short to medium term) expanding Hoo St Werburgh as a rural town for the Peninsula and then, in the medium to longer term, growing the existing smaller settlements. This will help the Council to meet their housing requirement and ensure that development is focused in accessible locations that support and enhance the local community and existing services.

## **Employment Site – Land at Kingsnorth**

In addition to the housing requirements, CCE also own land adjacent to the Kingsnorth employment area (call for sites submission ID 298, SHLAA ref. HHH35) and consider that this land could be made available to provide further employment opportunities, as and when required.

CCE and their consultant team have undertaken initial assessments and a land capacity study to identify the potential of the land within CCE ownership around Kingsnorth to deliver employment growth. Initial feasibility work demonstrates that land to the west of the existing Kingsnorth employment area and south of the railway line would be suitable for expansion in the short term.

The site is suitable and available for employment use which could accommodate between 157,000sqm & 176,000sqm of floorspace, split between B2, B8 and E uses. The site could also support the wider proposals of the Hoo St Werburgh Rural Town, which would deliver a highly sustainable new community, enabling people to live in close proximity to jobs, thus reducing need to travel far by car and encouraging use of sustainable means of travel (as set out in the draft Hoo Development Framework Masterplan, November 2022). A planning application is already progressing on part of the site for employment development (reference MC/23/0104). Therefore, CCE support the land at Kingsnorth having been identified as a potential employment site allocation in Map 5 of the consultation document as well as the support throughout the consultation document which recognises Kingsnorth on the Hoo Peninsula to be a unique opportunity for employment land provision, with a key role to play in Medway's economic development strategy.

## **Conclusions**

In summary, CCE encourage Medway to ensure that emerging policy creates a positive vision for Medway, is consistent with the NPPF and allocates sustainable sites for housing, and employment in line with the established need, in a manner that is sustainable and deliverable.

CCE are supportive of the consultation document, which includes meeting housing needs in full and identifying potential housing sites in urban locations and on previously developed land as well as in other greenfield locations. The identification and release of less constrained greenfield sites will be needed to meet Medway's significant housing need and to provide the range of housing types needed, including family homes. For this reason, CCE consider that land at Hoo St Werburgh, Allhallows, land around Stoke and Sharnal Street as set out in this letter are suitable for providing new homes to meet housing needs, both in the short and longer term.

CCE also supports the expansion of employment uses at Kingsnorth which could deliver much needed employment growth on the Peninsula.

We consider that the suggestions set out within these representations will assist in ensuring sustainable and deliverable development within Medway to help meet the Council's vision and strategic objectives. Please contact us if you have any questions regarding these representations. We would welcome the opportunity to meet with you to discuss CCE's landholdings and the emerging Plan further.

Yours faithfully

A black rectangular box used to redact the signature of Sally Furminger.

**Sally Furminger**  
Associate Director  
BA (Hons) MSc MRTPI

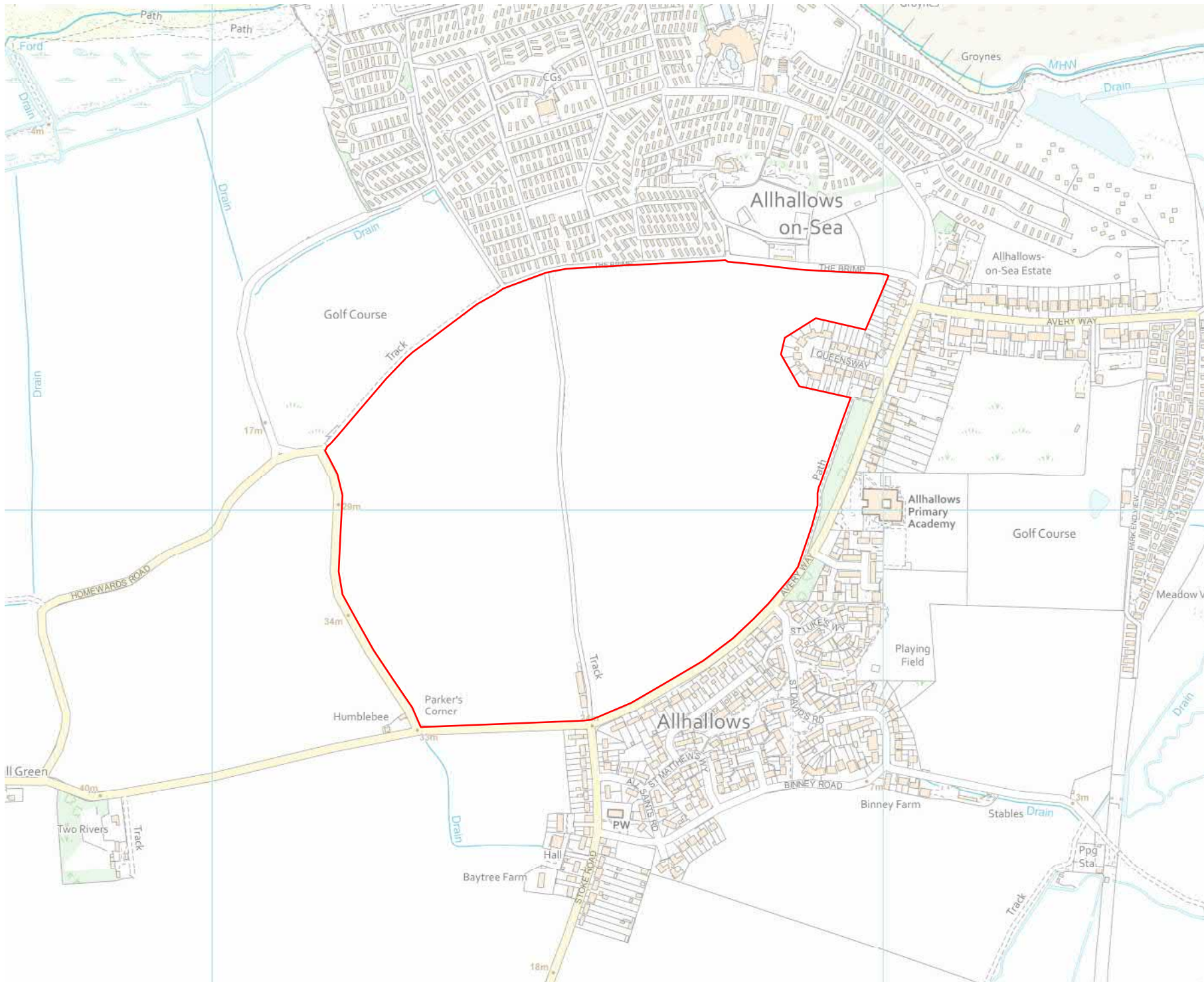


## **Annex 1: Site Location Plans**





**All Hallows (call for sites submission ID 294, SHLAA ref. AS21)**



Key



Site Boundary (area: 41.3 ha)

0 100 200 m

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Project Medway Call for Sites 2023

Title Site Location Plan - All Hallows

Client The Church Commissioners for England and Bourne Leisure Limited

Date 24.02.2023

Scale 1 : 7,500 @ A4

Drawn by MAR

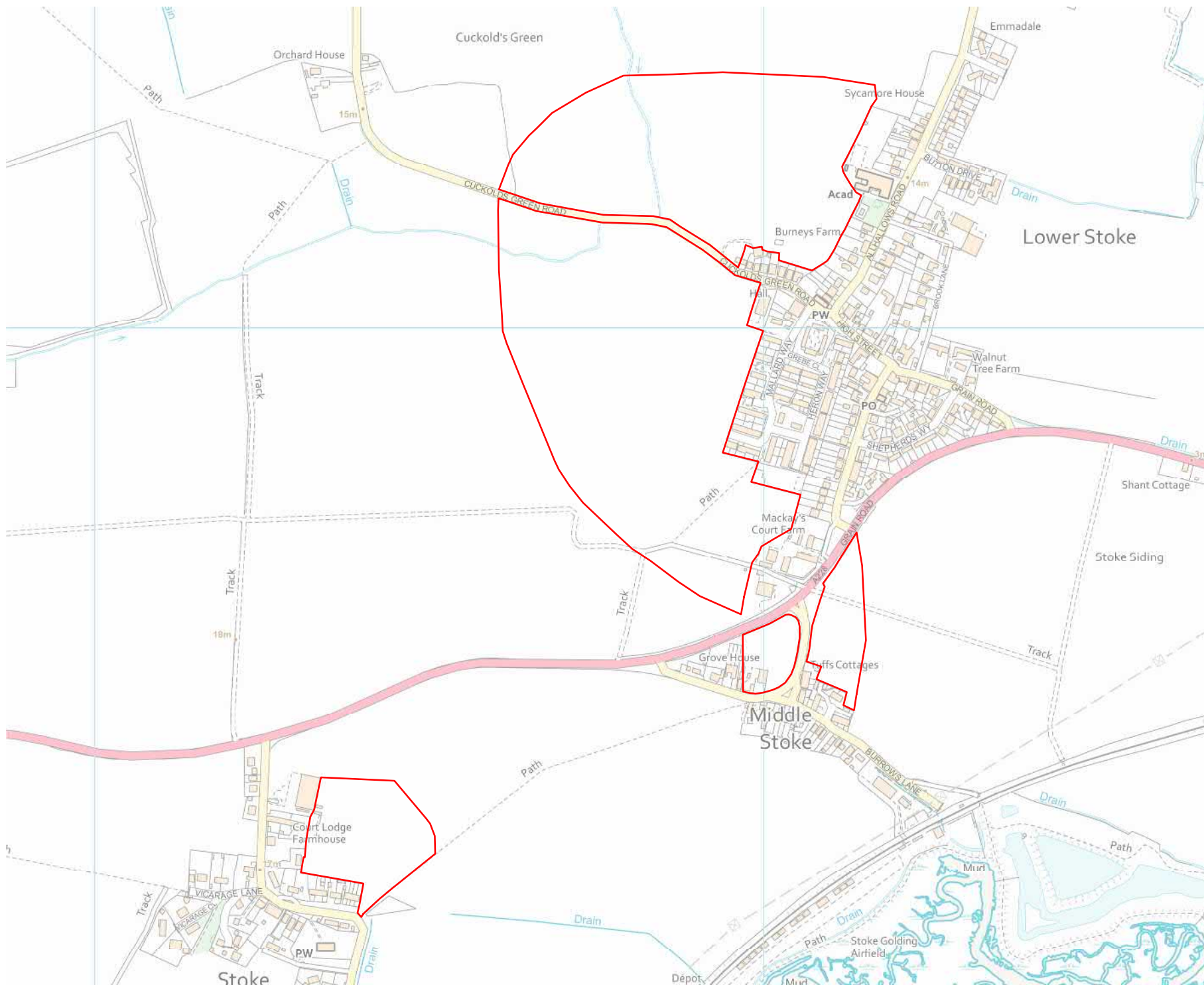
Drg. No GIS\CL\13786\01-01

GIS Reference : S:\CL Jobs\CL13786 - Medway Call for Sites 2023\CL13786 - Medway Call for Sites 2023 - Site Location Plan - All Hallows - 24.02.2023.mxd





**Lower Stoke (call for sites submission ID 295, SHLAA ref. AS13)**



Key



Site Boundary (area: 32.8 ha)

0 100 200 m

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Project Medway Call for Sites 2023

Title Site Location Plan - Lower Stoke

Client The Church Commissioners for England

Date 24.02.2023

Scale 1 : 7,500 @ A4

Drawn by MAR

Drg. No GIS\CL\13786\01-02

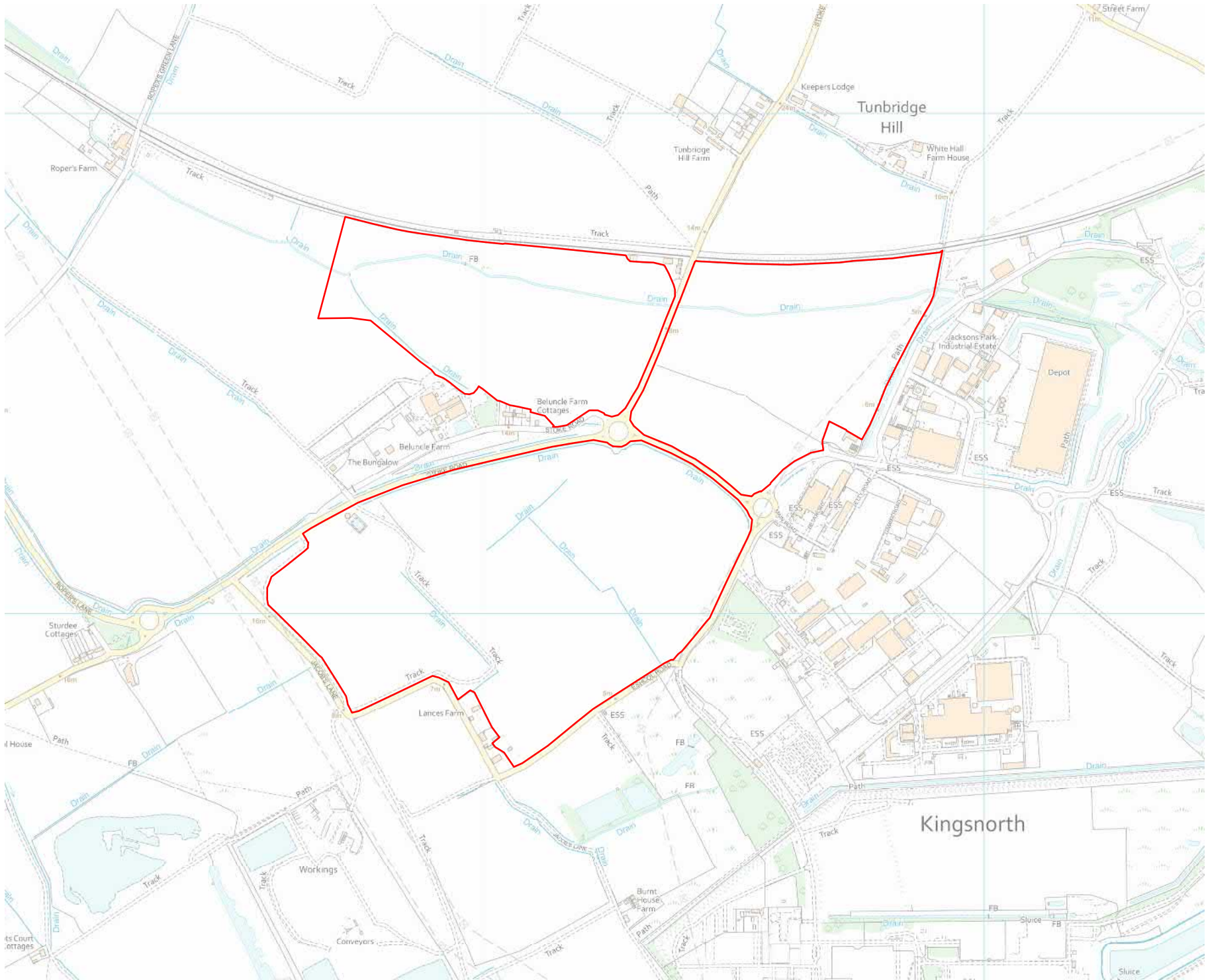
GIS Reference: S:\CL Job\CL13786 - Medway Call for Sites 2023\CL13786 - Medway Call for Sites 2023 - Site Location Plan - Lower Stoke - 24.02.2023.mxd





**Kingsnorth employment site (call for sites submission ID 298, SHLAA ref. HHH35)**





Key

Site Boundary (area: 76.6 ha)

0 100 200 m

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Project Medway Call for Sites 2023

Title Site Location Plan - Hoo: Kingsnorth

Client The Church Commissioners for England

Date 24.02.2023

Scale 1:10,000 @ A4

Drawn by MAR

Drg. No GIS\CL\13786\01-03

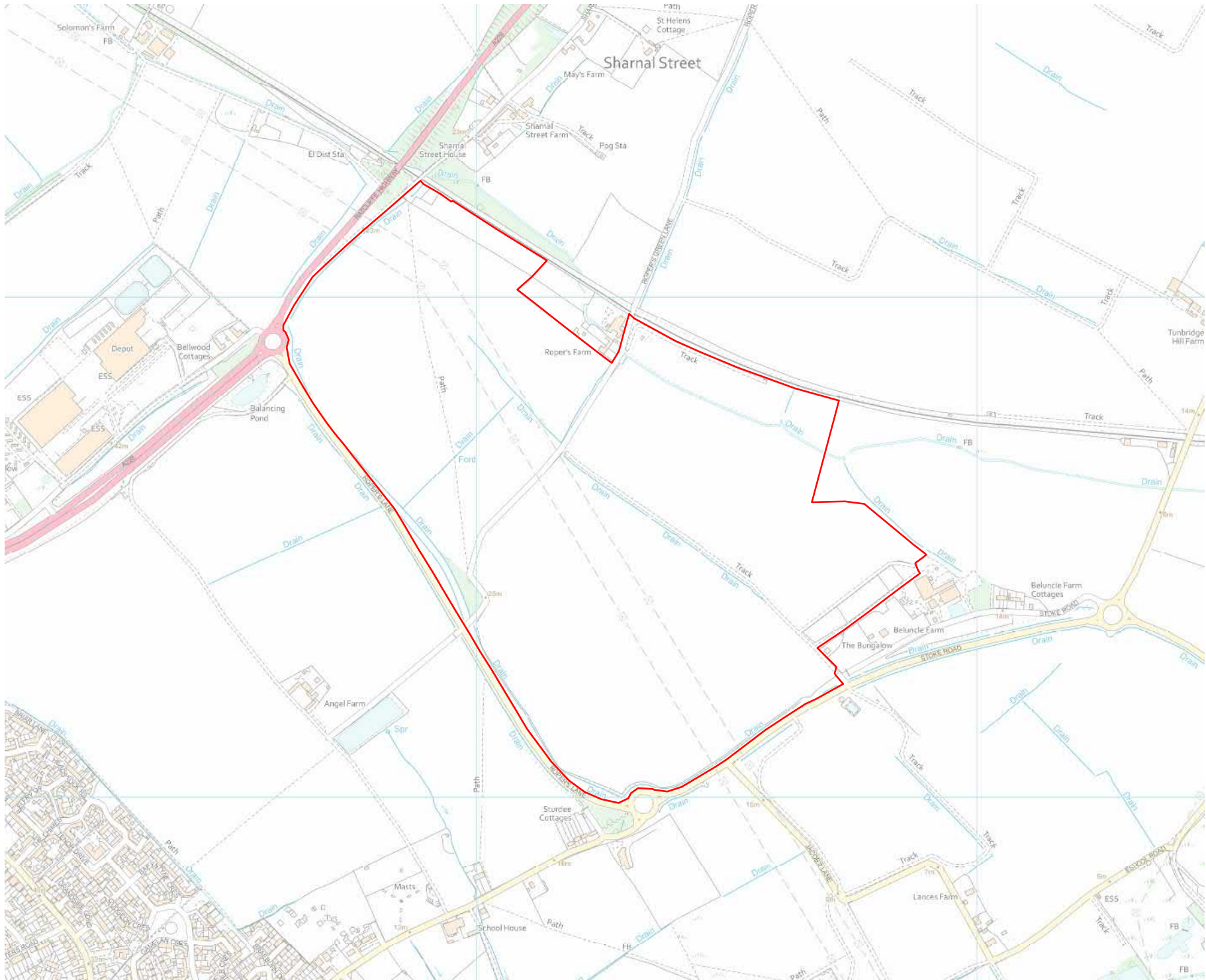
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**East of Ropers Lane (call for sites submission ID 299, SHLAA ref. HHH31)**



**Key**

Site Boundary (area: 82.3 ha)

0 100 200 m

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Project	Medway Call for Sites 2023
Title	Site Location Plan - Hoo: East of Ropers Lane
Client	The Church Commissioners for England
Date	24.02.2023
Scale	1 : 10,000 @ A4
Drawn by	MAR
Drg. No	GIS\CL\13786\01-04

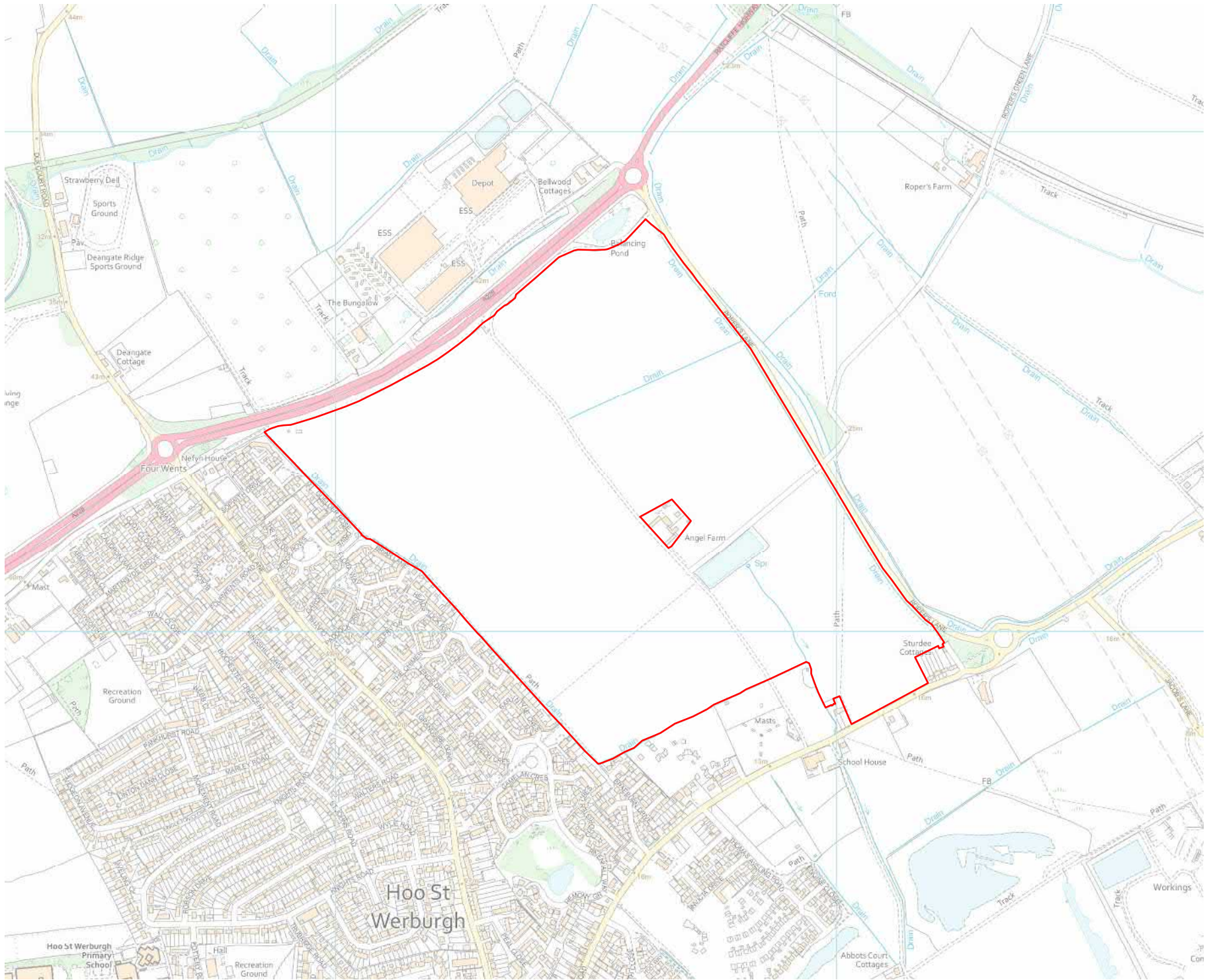
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**West of Ropers Lane (call for sites submission ID 300, SHLAA ref HHH22)**





**Key**

Site Boundary (area: 74.0 ha)

0 100 200 m

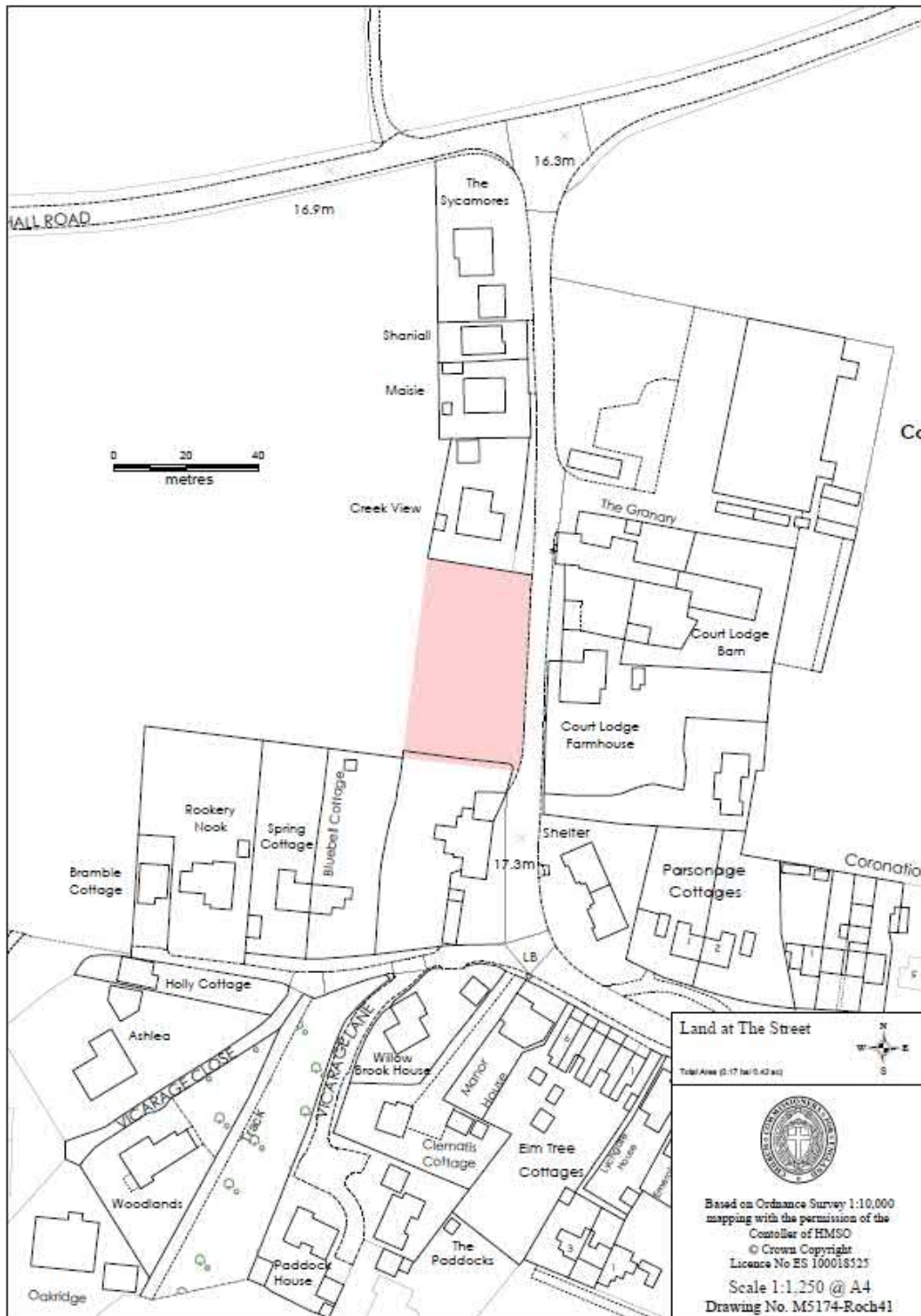
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Project	Medway Call for Sites 2023
Title	Site Location Plan - Hoo: West of Ropers Lane
Client	The Church Commissioners for England
Date	24.02.2023
Scale	1 : 10,000 @ A4
Drawn by	MAR
Drg. No	GIS\CL\13786\01-05
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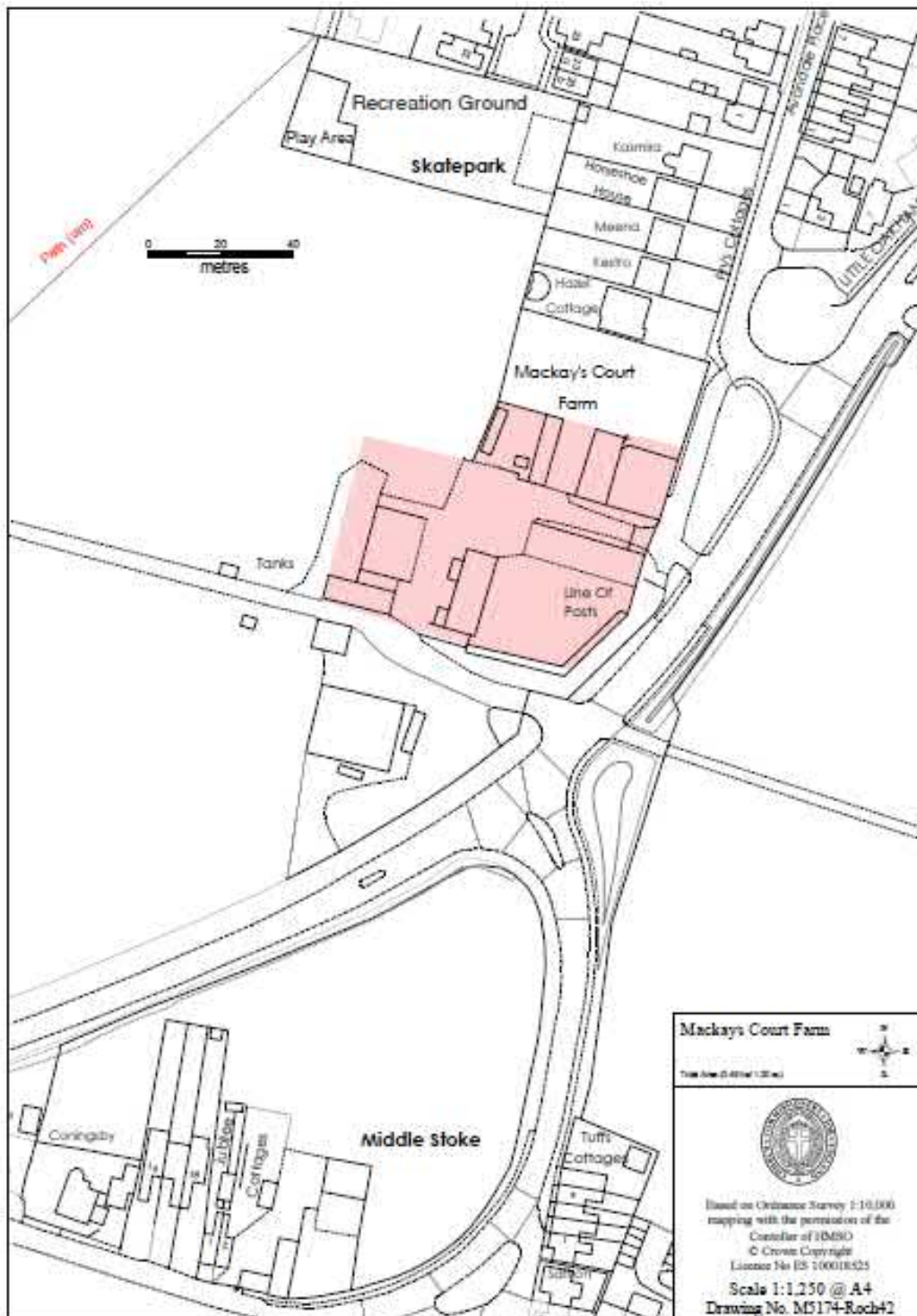


## Land at the Street (call for sites submission ID 301, SHLAA ref. AS11)



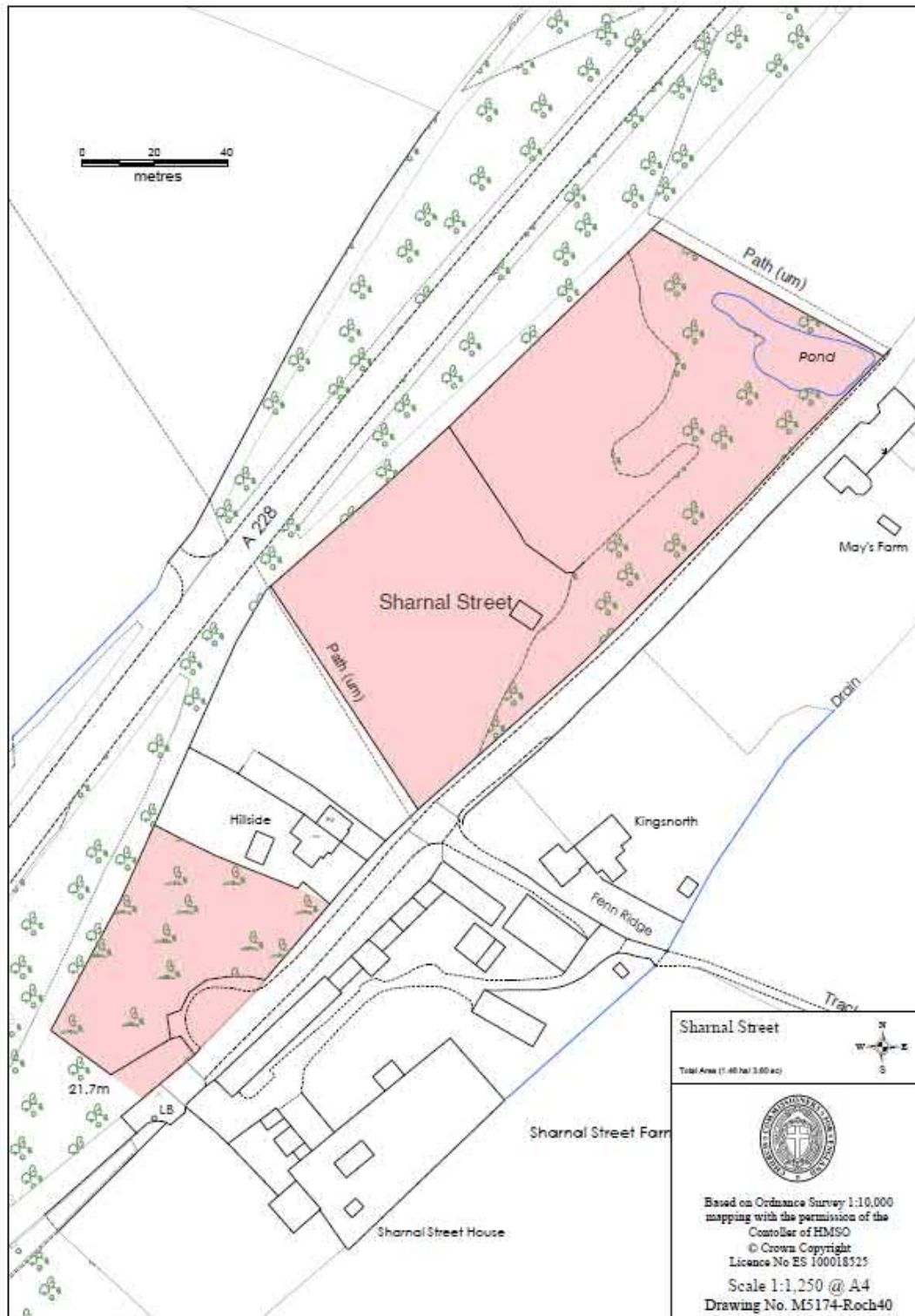


## Mackays Court Farm (call for sites submission ID 302, SHLAA ref. AS16)





## Sharnal Street (call for sites submission ID 304, SHLAA ref. HHH28)



## Burney's and Nord Court Farm

Site Location Plan Land to the West of  
Stoke Road



Produced on April 19, 2023.  
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50 m  
Scale 1:2500 (at A4)





Hillhurst Farm, Stone Street, Westenhanger, Hythe CT21 4HU  
Tel: 01303 814444 [www.bloomfieldsltd.co.uk](http://www.bloomfieldsltd.co.uk)

## **Future Medway Local Plan 2040**

### **Response to the Regulation 18 Consultation – Setting the Direction for Medway 2040**

#### **Sites known as:**

- 1) Land at Middle Stoke, Grain Road, Rochester, ME3 9RS**
- 2) Land to the North of the A228, Grain Road, Lower Stoke, Rochester**
- 3) Land to the East of the A228, Grain Road, Lower Stoke, Rochester**

**On behalf of Mr Richard Castle**

**Date:** 26 October 2023

**Job Ref:** 03.014.3201

## **Introduction**

- 1.1. We are writing on behalf of our client, Mr Richard Castle and family, of Dagenham Farm, Ratcliffe Highway, St Mary Hoo, Rochester, Kent, ME3 8RN in respect of the Medway Council Local Plan Regulation 18 Consultation Report – Setting the Direction for Medway 2040.
- 1.2. Mr Castle and family remain committed to the promotion of the sites at Grain Road Middle & Lower Stoke for residential development in the future Local Plan. This representation is made in this context and demonstrates a justification for designation of these sites as part of a sustainable rural expansion to meaningfully contribute to the Council's substantial housing requirements within the District.
- 1.3. These sites have been promoted for housing development through the Medway Council Call for Sites 2022 in February 2023. Following the publication of the Medway Land Availability Assessment (LAA) on the 16<sup>th</sup> October 2023, the three sites at Middle & Lower Stoke (See **Figure 1**) have been given the reference numbers as follows:
  - **AS15** - Land at Middle Stoke, Grain Road, Rochester – 0.86 hectares
  - **AS14** – Land to the North of the A228, Grain Road, Rochester – 2.71 hectares
  - **AS17** – Land to the East of the A228, Grain Road, Rochester – 7.82 hectares
- 1.4. During the *Stage 1: Identification of Sites and Initial Survey*, the assessment of these sites concludes that they should all subsequently proceed to Stage 2, where the Council will carry out a more detailed assessment. The LAA confirms that work is underway on Stage 2, involving estimating the development potential and an assessment of the suitability, availability, and achievability of each site, before considering whether constraints are capable of being mitigated.
- 1.5. These representations confirm that the three sites could be delivered in the first 5 years of the Local Plan period, and are available now.

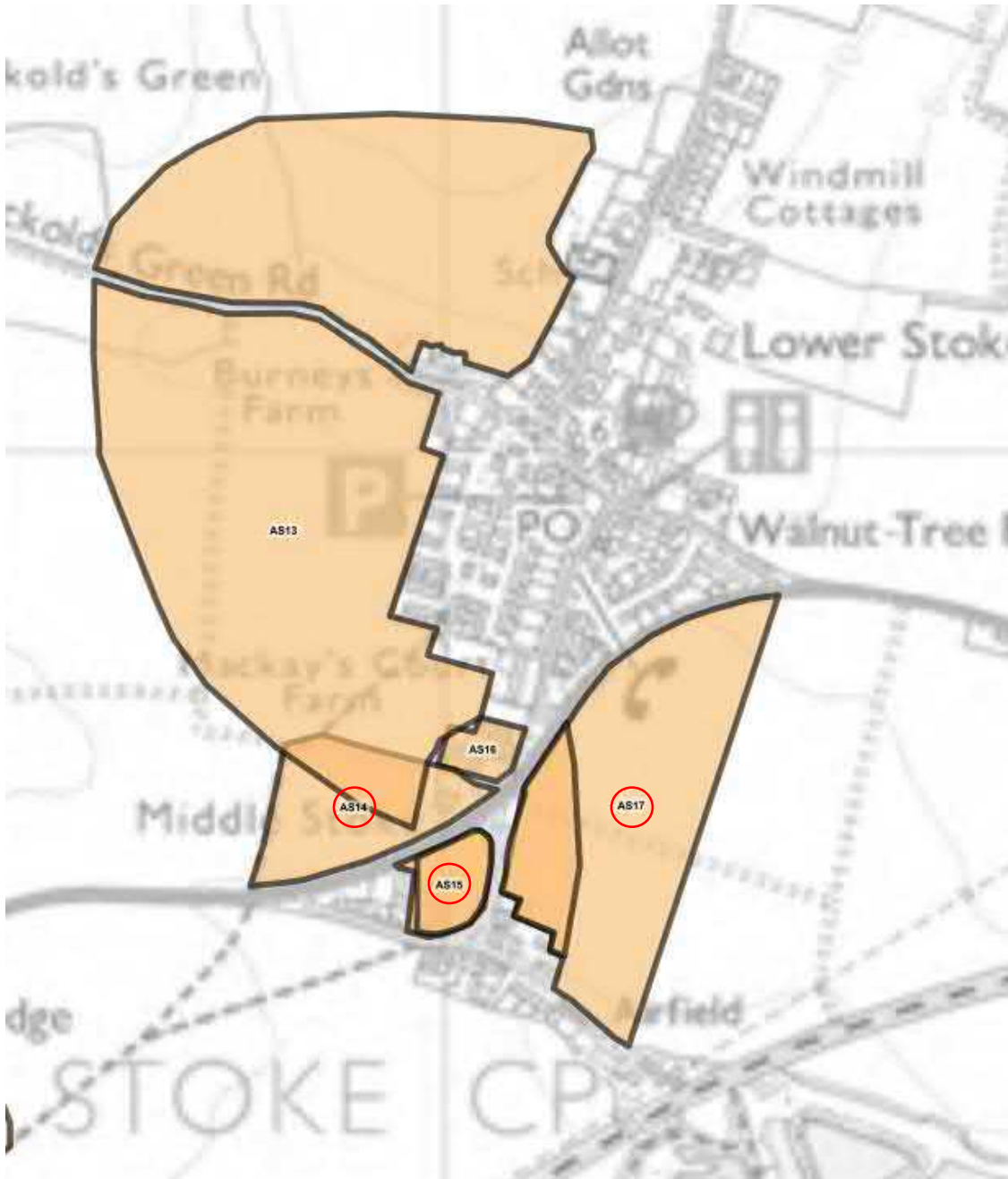


Figure 1 - Extract from Medway LAA showing sites AS14, AS15 and AS17.

- 1.6. The production of the Medway Local Plan has involved a number of key stages. With three stages already having been completed, the 'issues and options' (Regulation 18) completed in 2016, the 'development options' (Regulation 18) completed in 2017, and the 'development strategy' (Regulation 18) completed in 2018. This consultation, 'setting the direction for Medway 2040' (Regulation 18) consultation, marks the fourth consultation phase and the final regulation 18 consultation before the publishing of the Regulation 19 draft plan.
- 1.7. The current consultation considers why the Council needs to plan for Medway's growth. It refers to aspects of Medway that need to be safeguarded for the future, such as beautiful landscapes and historic buildings. The consultation document also outlines potential options for building new homes, workplaces and services, such as schools and surgeries.
- 1.8. It is understood that this consultation does not detail policies or identify those sites preferred by the Council for new development. However, this representation builds on previous submissions by Mr Richard Castle and family, who continue to promote the three sites at Middle and Lower Stoke for residential development, in the context of the current open consultation.

## **Context**

- 1.9. This representation seeks to continue the promotion of the three sites at Middle and Lower Stoke, Grain Road, Rochester, which have previously been promoted for residential development through the Call for Sites 2022 undertaken by Medway Council, and which have now been through an initial Stage 1 Assessment (**MC Ref: AS14, AS15 & AS17**) as part of the Land Availability Assessment (October 2023).
- 1.10. Prior to the Call for Sites 2022, there has been some previous promotion, as summarised below, albeit it is noted that Sites AS14 & AS17 have not been previously promoted through any earlier representations.

### *AS15 – Land at Middle Stoke, Grain Road, Rochester*

This site was promoted through representations made in respect of the Medway Strategic Land Availability Assessment (SHLAA) 2017 under site reference 0794 and in



response to the subsequent Medway Local Plan 2012-2035 Development Options Consultation.

- 1.11. Most recently, site AS15 has been subject to an outline application for up to 9 dwellinghouses as part of application MC/23/0106. On 27 September the Committee voted for a resolution to approve the scheme, following the Council's recommendation to approve subject to clarification from HSE. Such clarification has at the time of writing been received by HSE and the principle of residential development on site AS15 is considered acceptable. Respectfully, this position should be carried forward by the Council in terms of site allocation; albeit, it is accepted that the development is likely to come forward prior to any approval of a new Local Plan.
- 1.12. It is **supported** that during this Regulation 18 consultation that these three sites on land at Middle & Lower Stoke are now included as part of the defined area being promoted by Medway Council as **Rural Development Sites**, as shown on **Map 3** within the Regulation 18 – Setting the Direction for Medway 2040 (September 2023) consultation document a having potential for providing capacity for 14,736 homes.
- 1.13. This representation confirms that the location of the sites on the edge of an existing settlement are considered to be sufficiently sustainable and suitable for a mixture of small-scale residential development (AS15 – Land at Middle Stoke) and for high-quality, landscape-led, low density residential development (AS14 & AS17 – Land to the North and Land to the East of Grain Road). Site AS14, by virtue of its location, could also be developed, not only in isolation, but more strategically with neighbouring sites to the north, as also being assessed through the LAA.
- 1.14. This representation responds to the current Regulation 18, by responding to each of the headings in the consultation plan, and identifying how the sites can assist with delivering the vision and objectives through sustainable development.
  - The vision for Medway in 2040
  - The strategic objective; and
  - Developing a Spatial Strategy

## **The vision for Medway in 2040**

- 1.15. The NPPF (paragraph 20), sets out that strategic policies should *‘set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for [amongst others]:*
- a) *housing (including affordable housing), employment, retail, leisure and other commercial development’;*
- 1.16. Furthermore, the National Planning Policy Framework (‘NPPF’) requires that in order to boost housing supply, local planning authorities (‘LPAs’) should identify a supply of specific deliverable sites sufficient to provide 5-years’ worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of housing.
- 1.17. The consultation report highlights at paragraph 5.4 that *“It has to be recognised that there is a housing crisis, particularly regarding affordability and there is an absolute need to provide the right homes in the right places to meet Medway’s growing needs and the requirements for those desperately needing a good quality home”*. It goes on to acknowledge that many existing residents are living in over-crowded and / or sub-standard housing conditions.
- 1.18. It is important that the protection of the intrinsic character and qualities of a site or an area are considered, but these qualities can be protected when new housing development is delivered, through good design and by improving the sustainable networks and access to places and services. Rather than seen as negative, new housing development should be seen as an opportunity to improve the area for the current and future residents delivering the types and quantity of homes that are desperately needed. On this basis, respectfully, reference to ‘housing delivery’ should be made in the vision.
- 1.19. The NPPF sets out in paragraph 22 that it is important that *‘where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery’*.

- 1.20. It is submitted that the residential development of these three sites at Middle & Lower Stoke would be able to contribute positively to the existing elements of the vision for Medway, but would also be able to deliver important housing numbers early on in the Local Plan period. The sites are all available, and their development considered to be achievable.

## **Strategic Objectives**

- 1.21. Paragraph 119 of the NPPF sets out that *'planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'*.
- 1.22. It is set out in the current consultation that *"The role of the Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment"*.
- 1.23. In order to deliver the Local Plan, it is proposing that the plan is set around strategic objectives. *"The objectives will feed into the wording of policies and how sites and different locations are assessed for potential development. The objectives are presented around broad themes for the environment, communities, economy, and investment in infrastructure and design that is fit for the future"*.
- 1.24. This representation **supports** the use of objectives to deliver the strategic aims of the plan, but wishes to raise the following comments regarding the individual objectives:

### **Objective: Prepared for a sustainable and green future**

- 1.25. The objective to support action against climate change and a sustainable future for Medway is **supported**. This actively meets the aspirations of paragraph 153 of the NPPF which sets out that *'Plans should take a proactive approach to mitigating and adapting to climate change'*.
- 1.26. This representation promotes the delivery of sites in the rural area to help deliver 14,736 homes, amongst others, as a way that could deliver a sustainable and green future for Medway.

1.27. Paragraph 5.41 of the Regulation 18 consultation sets out that *“large scale development around Hoo St Werburgh and neighbouring villages could provide for planning 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”*.

1.28. This representation supports the rural development option, amongst others, including the suburban expansion option, as a way of delivering a sustainable and green future for Medway. They will bring forward opportunities to support sustainable communities and incorporate future sustainable transport network. It will also enable the wider and strategic aim of supporting a green and blue framework for better connectivity for wildlife and improve the quality of lives for residents within.

Objective: Supporting people to lead healthy lives and strengthening our communities

1.29. Section 8 of the NPPF provides guidance on ‘Promoting Healthy and Safe Communities’. The proposed objective in the Medway Local Plan actively meets this objective and is therefore **supported**. But, respectfully it is considered that there is an **omission** in how the objective is drafted.

1.30. The intentions of the third bullet point, proposes to strengthen the role of Medway's "urban, neighbourhood and village centres..." This position is supported, but it is considered that ‘urban and rural extensions’ should also be included in this objective, especially, as the inclusion of urban and rural extensions are included within the proposed spatial strategy for delivering growth.

1.31. It is considered that the provision of such extensions will help to develop and strengthen transport networks and encourage for safe and sustainable travel as advocated elsewhere through the plan.

Objective: Boost pride in Medway through quality and resilient development

1.32. This representation **supports** the provision of quality and resilient development in Medway and we support the Council’s recognition that growth does not mean losing character of an area.

- 1.33. The second bullet point sets out that sustainable development should be directed to the *“most suitable locations that can enhance Medway’s economic, social and environmental characteristics”*. This stance is supported, as it acknowledges that development of both brownfield and greenfield sites can come forward to meet the housing requirement. The most suitable locations that can enhance Medway’s economic, social and environmental characteristics should be utilised to deliver the housing requirement of the area.
- 1.34. An allocation for development of the sites at Middle & Lower Stoke would provide an opportunity to deliver this objective, in a development which meets the aspirations of sustainable development, directing development to the most suitable location

### **Strategic objectives**

- 1.35. The level of housing need required for the Medway area identifies a requirement for 1,667 homes a year in Medway, which provides a total figure of around 28,500 homes to be delivered before the end of 2040. This figure could further be increased, as it is identified in paragraph 5.11 that Medway are currently considering a request from Gravesham Borough Council to increase capacity by 2000 homes to help meet the housing need of their district.
- 1.36. In March 2023 Gravesham Borough Council produced its Five Year Housing Land Supply Statement, covering the period 2022-2027. This document sets out that Gravesham only has 2.9 years of deliverable housing supply. In accordance with the Gravesham Local Development Scheme (January 2023) the new Local Plan for Gravesham is not expected until December 2024, and thus, the Borough’s Housing Land Supply (HLS) is not likely to improve in the near future. The high likelihood of Medway having to absorb some of this housing need should not be ignored in the early stages of Local Plan creation for Medway.

- 1.37. It is understood that Medway Council are still establishing final numbers, due to the Council raising concerns with the Government derived figures, and the basis and calculations on which final numbers are determined. However, it is made clear in paragraph 5.13 that the Council will look to find potential site allocations enough to provide for 19,000 dwelling units, the additional 7500 sites being provided through extant supply.
- 1.38. We wish to raise an **objection** to this approach advocated by paragraph 5.13 because the acknowledged uncertainty in the number of housing numbers required to be delivered, means that a more cautious approach, by allocating more sites should be taken.
- 1.39. The Council should be looking at allocating more sites, to meet a potential increased capacity, in the Local Plan to ensure that there is an appropriate buffer should there be an additional requirement for housing in the Medway area, rather than relying heavily on delivering the target number of 28,500 homes.
- 1.40. In accordance with paragraph 69 of the NPPF, it is identified that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. It sets out that 'to promote the development of a good mix of sites local planning authorities should:
- "a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare";*
- 1.41. On this basis, these representations advocate that the Council looks for a larger number of sites to ensure that there are enough sites to meet the housing requirement, including the buffer. The use of smaller sites to meet this demand should be a desired approach, with Site AS15 (Land at Middle Stoke) being an opportunity to assist with the delivery of this.
- 1.42. Further, Paragraph 66 of the NPPF clearly sets out Strategic policy-making authorities should establish a *'housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period'*.



- 1.43. On this basis, these representations also advocate that the Council seeks to provide a larger number of sites to ensure that there are enough sites to meet the housing requirement and include the buffer. All three sites referenced in these representations can assist with ensuring that housing delivery is met.
- 1.44. It is noted in paragraph 5.15 that the LAA have identified land with the potential capacity for c 38,200 homes. These sites will be taken forward to the next stage of detailed site assessment. It is important that these sites are not discounted early-on before any final housing numbers are decided.

#### The Rural Development Areas

- 1.45. These representations support paragraph 5.40 of the consultation, which sets out that the Hoo Peninsula provides a significant opportunity for the “*development for homes, jobs and services*”.
- 1.46. This representation supports the approach to utilise The Housing Infrastructure Fund (HIF) programme to deliver improvements to transport and put measures in place to strengthen the local environment in the Hoo area.
- 1.47. In accordance with Paragraph 5.41 of the 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.

### **Summary**

- 1.48. These representation continue to promote the three sites referenced at Middle & Lower Stoke for potential site allocation in the Future Medway Local Plan 2040.
- 1.49. It is considered that the provision of housing development being delivered through rural development is supported. The sites provide an opportunity to deliver much needed housing development without any identified constraints.

# 1 Vision

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

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

F D Attwood and Partners have a significant landholding of 365ha, which runs the full length of the Capstone Corridor from Darland Banks to the M2 motorway (identified on the attached plan). This single family landowner supports the overall Medway vision for the plan, particularly in the following areas:

- The overall framing of the vision and the recognition that development can bring forward positive benefits if planned well. It is positive that there is recognition the vision must be ambitious (para 2.4) and looks forward and is not overtly influenced by past choices that were taken in a different context based on a specific locational preference which has dominated past spatial decision making, namely Hoo. It is also right that the vision should be the starting point from which spatial options can later derive to identify the “best fit.”
- The need to address existing inequalities and create more inclusive communities is identified in the vision and this is supported by FD Attwood and Partners and can best be addressed by new development for the suburban and urban waterfront options. The focus on urban regeneration is fully supported and rightly prioritised subject to the caveats highlighted in our response to Question 2. The highlighting of the important role of existing High Streets within the vision is also commended and again the urban and suburban spatial options which are geographically the closest, and already serve a large urban area catchment, will be better placed to meet this important objective and help revitalise the town centres as important social meeting places and reinforcing the identity of Medway.
- The need to meet growth through mixed communities and the desire to create jobs alongside housing and reduce existing levels of out commuting is also fully supported in the vision and clearly, options that improve travel choice and infrastructure, will best deliver this aspect of the vision.
- Highlighting that infrastructure and services must be delivered with new development to create balance for the existing and new communities is pivotal and fully supported and this certainly has not been delivered by national planning decision making in the past and is another reason to support the need for the vision to be positive and ambitious rather than to be governed by what didn’t happen in the past.
- Meeting the full spectrum of housing needs, including first time buyers and importantly the increased delivery of affordable housing, is supported.
- Highlighting that the vision should be underpinned by quality development which includes SUDS, open space, recreational and health, alongside community and social infrastructure, is fully supported and it is right to emphasise this can best be achieved through a comprehensive masterplanned approach where healthier, safe and better connected and sustainable places which are more inclusive can be delivered.
- The recognition of the central importance of climate change and addressing air quality in driving decision making is fully supported alongside the emphasis on the importance of

connected spaces and particularly green infrastructure, which in the case of the Capstone Corridor, represents a unique opportunity to connect existing urban areas and the planned growth at Lidsing Garden Community (which will include significant areas of green and blue infrastructure ) with existing green assets in this corridor such as the Capstone Country Park.

### **Message Summary**

The Attwood family have a very significant strategic landholding at Capstone which offers an opportunity for the stated objectives of the vision to be met through comprehensive masterplanning and coordinated infrastructure delivery to meet a range of development needs, whilst also delivering significant biodiversity gains.

## **2 Strategic Objectives**

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

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

The comments relating to the strategic objectives overlap in a number of areas with F D Attwood and Partners vision response at Question 1.

It is highlighted that the prospects of the vision being executed are increased if landowners, the community, the LPA and other stakeholders work collaboratively. F D Attwood and Partners firstly would welcome the chance to work collaboratively during the emerging local plan process rather than in an attritional way, which will give the best prospects of the vision and strategic objectives being delivered. This is even more important for the Capstone Corridor as important decisions on the masterplanning of Lidsing Garden Community (occupying 119ha of the southern portion of the corridor) will be taken in early 2024, led by the masterplanning team of the Attwood family and Maidstone Borough Council alongside community input.

The highlighted strategic objectives, each of which is supported by the landowner, will also best be delivered where comprehensive scale masterplanning opportunities are available, which ideally should be within single landownership control. This will allow a long-term strategy to be formulated to implement the vision and there is greater certainty of phased delivery providing long term certainty for all.

For the urban and suburban spatial options, the noted existing shortcomings of infrastructure provision, services, transport and open space connectivity in the surrounding area can benefit from new development, particularly of greater scale and where it is comprehensively planned. In the case of the Capstone corridor, the Capstone Country Park represents a “hub” that local communities could be better connected to for recreation and health objectives. These benefits of addressing existing inequality and infrastructure shortcomings will not be delivered by the new settlement spatial option, as explained further below.

In the case of the urban area extension of Capstone, another unique benefit is that development can capitalise on the development nucleus planned at the Lidsing Garden Community (in the

adjoining Maidstone borough), comprising significant areas of open space, 2,000 dwellings, 14ha of employment and a new village centre. Medway Council has the opportunity to work alongside the landowner and Maidstone Council to progress the emerging masterplan framework for the southern portion of the Capstone corridor in early 2024. This has direct relevance to the consideration of Medway's spatial options as the Lidsing Garden Community includes a large 14ha employment area close to the M2 Junction 4 and the Medway vision and strategic objectives focus on the need for out commuting to be reduced and the vision delivering mixed communities with jobs close to housing and services. Lidsing is therefore already a planned development platform in the southern portion of the corridor and it would represent a "missed opportunity" not to give this advantage some weight when considering the remainder of the corridor (which is possible because of the single family land ownership) to the north of Lidsing. This is a unique advantage of the Capstone Corridor falling within the suburban/edge of urban area spatial option.

The single ownership and partnership approach offered by F D Attwood and Partners, as landowners, is unique and for other reasons can best deliver the vision and strategic objectives. For instance, because of the single family land ownership control, viability work already undertaken for the landowners has "priced in" necessary infrastructure and services alongside the mix of development uses. These benefits, which will also impact on the existing urban areas surrounding the site, will be delivered without the need for public funding.

Lessons have been learnt from past suburban estate development and as the Medway vision suggests, the emerging local plan must look forward, not back. The Capstone Valley is today an arbitrary residual land corridor that is a legacy of piecemeal suburban growth in the 1980 and 1990's where major road infrastructure (which should have accompanied housing growth), was not delivered alongside it causing congestion of the network. The remaining land within the corridor, by many (particularly local residents), has been regarded as a "battleground" where no further development should encroach. However, successive appeal decisions by Local Plan Inspector's (Lidsing...2,000 dwellings) and Section 78 appeal Inspector's, East Hill (800 dwellings) and Gibraltar Farm (450 dwellings), have disagreed with the past landscape value assessment that has derived from past political commitments made when the 2003 Medway Local Plan was adopted.

There is now an opportunity for the corridor to be reassessed in a new and positive context, to consider objectively how the outlined vision and strategic objectives can best be delivered. For the suburban option, there is the opportunity to knit the existing urban communities together with recreational public open space and wildlife corridors, linking up with the Capstone Country Park and the planned Lidsing Garden Community and delivering a more widely accessible north-south and east-west axis that will still maintain the separate identities of the existing urban sub areas and community identities.

In the past, strong views have been held that development in the Capstone corridor would exacerbate existing congestion. 3,250 dwellings within the control of the landowner are already planned along the corridor's length, which individually demonstrate clear transport benefits. A fully comprehensively planned transport corridor, if supported by the local plan process, would deliver even greater transport benefits to add to the east-west transport links and rebalancing of M2-J4 and J3 as well as enhanced opportunities for non-car mode improvements that are already to be delivered by planned development in this corridor.

### Message Summary:

- Local plan vision and the overlapping strategic objectives are fully supported.
- Comprehensive masterplanning of land within single family control will best create the framework for the vision and objectives to be delivered and there will be long term certainty for planning decision making.
- If the vision is delivered at the suburban edge where existing urban areas can be “knitted together”, these existing communities will also benefit from new infrastructure and the planned mix of uses including new services, open space and local jobs. This represents a “double benefit” of growth compared with a new settlement where the principal planning objective is to make a non-sustainable location “self-contained.”
- To allow real visioning and consideration of how the strategic objectives will best be achieved along side it, FD Attwood and Partner’s believe that historical strongly held and emotive views relating to growth in the Capstone Corridor should be reevaluated in the new positive and visioning context that is suggested will be adopted.

## 3 Developing a Spatial Strategy

Considerations in developing a spatial strategy are presented on pages 11 to 29 of the consultation document.

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

The primary consideration in delivering a sustainable spatial strategy should firstly focus on brownfield redevelopment of the riverside and town centre. It is agreed that the support for High Streets and urban regeneration should underpin the whole strategy and this is fully supported by F D Attwood and Partners subject to the following caveats which relate to the housing capacity yield from development in this area including ;

- The historic character of the riverside has to be preserved and part of the character for this area derives from the mix of uses including employment. The document rightly acknowledges heritage value in the vision and objectives and the role of this area for tourism (see paragraph 4.2) should also not be underestimated. These factors will influence estimates of housing yield that is deliverable within the plan period.
- As well as the need to preserve the character of the area as outlined above, there are also viability considerations which need to be taken into account in this area and the likelihood that these sites may only be delivered by high density apartment construction which will not deliver a range of housing and are also subject to greater market sensitivity, that in turn affects housebuilder interest and deliverability.

The principle of adopting a sequential approach to the spatial strategy that focuses on brownfield riverside development and urban regeneration is supported but for the reasons outlined above, there must be caution in the net capacity of these areas to meet the housing need and the timescale to delivery and for this reason, we support the riverside being a component of a suite of spatial options.



As part of the sequential spatial approach, the next favoured option in terms of sustainability benefits, should be the suburban extension choices which, as previously highlighted (if planned comprehensively alongside infrastructure), would also benefit the existing urban areas adjoining these areas and in this case, could provide certainty to the whole of the Capstone corridor length.

The opportunity of a comprehensive masterplanned approach to link the existing planned building blocks within the Capstone Corridor, including Lidsing Garden Community (2,000 dwellings), Gibraltar Farm (450 dwellings) and East Hill (800 dwellings), which are also within the control of the landowner, offer a unique opportunity to deliver a wide range of planning benefits from this spatial option which places Capstone as a suburban extension ahead of the suburban alternative of Rainham which has:

- Greater acknowledged highway congestion and air quality issues on the A2 and road network around it;
- Is of a higher agricultural land value;
- Is part of a strategic gap between Rainham and Newington;
- Lies in closer proximity to the Medway Estuary SPA and its setting.

As part of a sequential approach, it would only be in the event that Medway Council cannot deliver road, open space and community/utility infrastructure alongside biodiversity enhancements to support growth in the suburban areas (alongside riverside growth), that a new community on the Hoo Peninsula should be considered as a third option, with its more limited objective to create a self-contained community in a non sustainable location.

The past 'driver' of LPA decision making which favoured Hoo vis a vis the Capstone Corridor (aside from the HIF Funding for infrastructure), was a perception that development in the Capstone Corridor would erode the character of the valley and its function as a green lung for the existing urban areas around it. However, successive Inspector's (for local plan and Section 78 appeals) have disagreed with this assessment and now these planned developments can provide building blocks of a new comprehensive vision for the whole of the corridor integral to which will be green infrastructure and biodiversity enhancements that links with the surrounding communities.

Whilst the local plan evaluates objectively all spatial options to deliver the vision and agreed strategic objectives, FD Attwood and Partners consider that an alternative high-level assessment of character impact should now be utilised, which is very different to that adopted in the past in order to drive spatial decision making. This new approach is justified because it is acknowledged throughout the plan that the character of Medway on the headland, to the north of the river Medway, is very different. Whilst large new country parks have previously been offered to mitigate the impact of major growth on the headland, the siting of major development in this area will comparatively affect to a greater degree, the more remote character of this part of Medway ( which is recognised at paragraph 5.36) and is also more environmentally sensitive (protecting natural assets is recognised at paragraph 4.2 and 5.10) and important to tourism and the character of Medway in its totality as an administrative area.

For these reasons, it is asserted that, in the consideration of spatial options, major scale development on the headland should only be considered as a spatial option in the event that

the suburban growth option is discounted for the reasons outlined above. Major growth at Hoo, even if it could address road capacity, rail connectivity and environmental impact considerations, is not as well placed as other spatial options to support the High Street, create more inclusive and connected communities that address current inequalities, or support tourism. The principal vision and strategic objective of major growth at Hoo is to make it “self contained” to boost its sustainable credentials and rely on the fact that it is likely to be the subject of less public objections, because it is located well way from the main populace of Medway. For these reasons, in terms of delivering the supported vision and strategic objectives, Hoo represents a third-tier option.

The Reg 18 Document at paragraph 5.41 when referencing Hoo specifically asserts that;

*“Such development could also help to meet the Council’s ambition for greener growth with higher environmental standards in construction, communities better connected for walking and cycling and within easy reach of local services.”* This assertion is strongly contested by F D Attwood and Partners for the reasons explained in this response.

The option of the Green Belt release in line with national guidance should be weighted a “last resort” spatial option. The fact that the Green Belt occupies only 2% of the land area of Medway; performs an important strategic function in preventing the urban sprawl of Strood and Higham and Snodland and Halling; and in addition to this, is designated as AONB, provides national recognition of the landscape quality of this area as well as its spatial GB functionality. As part of a sequential approach, this option should only be examined further when it is proven that the other spatial options cannot be delivered.

The technical work of FD Attwood and Partners can demonstrate that:

- Comprehensive masterplanning and delivering of infrastructure;
- Mix of uses;
- Quality of development including SUDS and other technical issues;
- Transport benefits and access considerations can be delivered; and
- Landscape open space and biodiversity linkages, particularly with the Capstone Country Park hub.

These matters can be fully addressed without the need for public funding and will also benefit the existing local communities and provide community cohesion.

At Para 5.35 of the Regulation 18 consultation document, there is recognition of the cross-border impacts and the fact that early masterplanning decisions via the Lidsing SPD document, will be starting to be made shortly. As highlighted earlier, we see this as an opportunity for better masterplanning output through collective working and cooperation between the Attwood family, Medway Council, Maidstone Council and Kent County Council across the entirety of the corridor including Lidsing.

## 4 Land Availability Assessment

Medway Council has published an interim Land Availability Assessment.

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

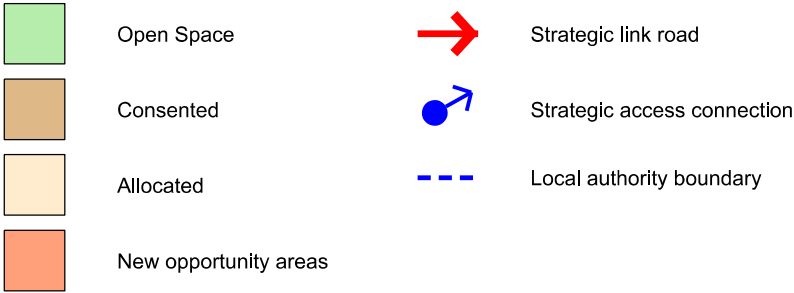
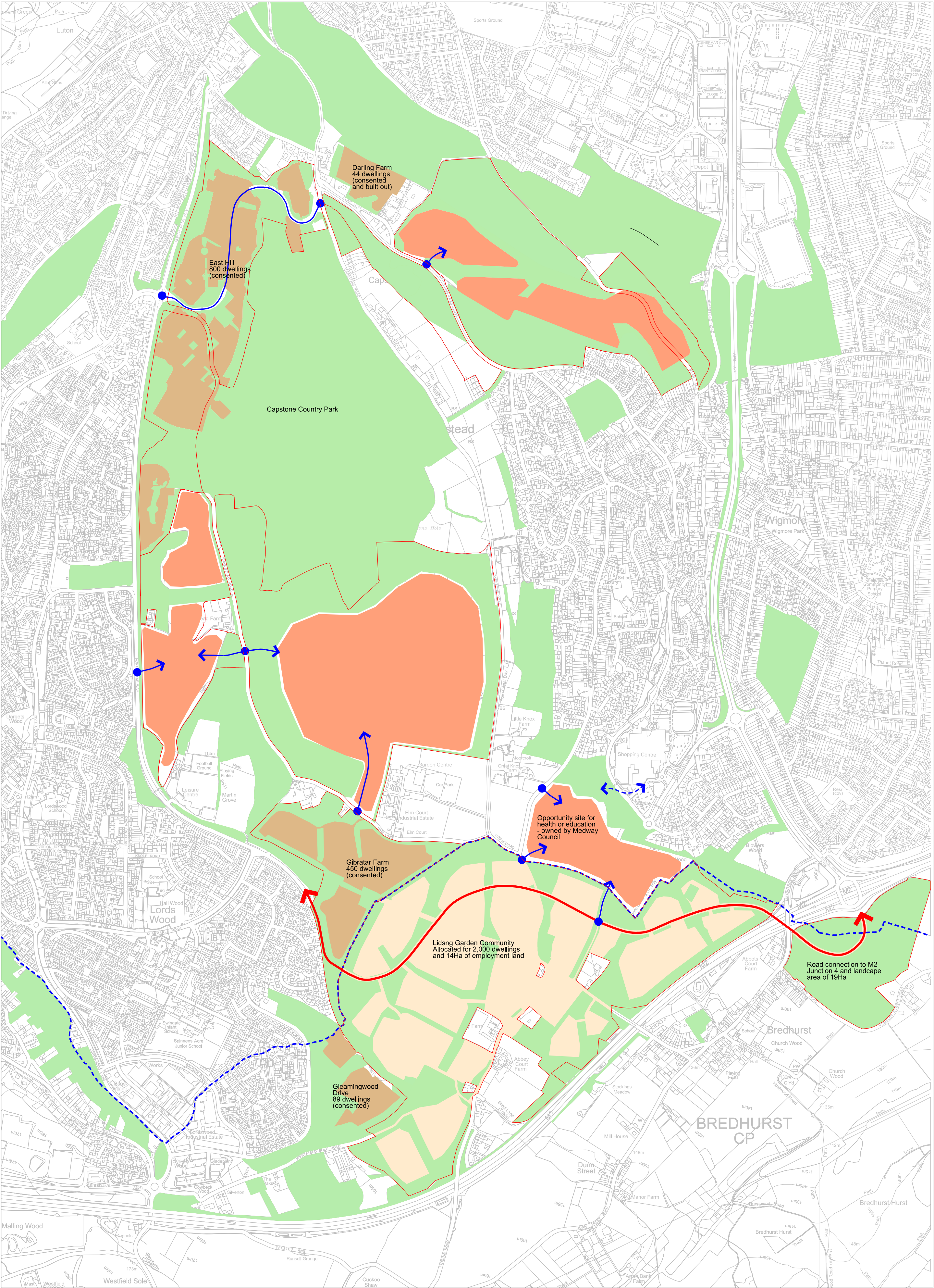
The Interim Land Availability Assessment identifies a number of different parcels, but the FD Attwood and Partners land is the only one that offers a long-term master planned solution for such an extensive area covering the whole of the Capstone corridor.


There are a number of references of positive outcomes to be achieved, as embodied in the vision and strategic objectives from a strategic and comprehensive masterplanned approach (including paragraph 5.28 for the riverside), however this is realistically more difficult to achieve where land ownership is fragmented. This places the F D Attwood and Partners land opportunity on a different level to other options, both in terms of the visioning, but also in terms of the certainty of viability assumptions and delivery.

The message from the landowner/promoter is that:

- The totality of the land identified on the attached plan is available and deliverable and improved land use planning benefits can be delivered by a comprehensive approach which will provide certainty to all parties.
- Building blocks of development within the corridor and landowners' control e.g. Lidsing (open space, 2,000 dwellings and 14ha employment), Gibraltar Farm (450 dwellings) and East Hill (800 dwellings), have already been approved and the opportunity exists now to masterplan the whole corridor and provide collective certainty of infrastructure provision, open space and public access and transport improvements and job creation for all. Planning in this way will ensure the maximum benefits for Medway are delivered as part of a collaborative approach and working with Maidstone BC on the development of the Lidsing masterplan framework, which will commence in early 2024.
- Medway's planning team and members of the new administration can be confident that a comprehensive masterplan would deliver a wide range of land uses including housing, employment, recreational space and community and retail uses to meet future Medway's needs at a sustainable location. These land uses within the site would all (via the masterplan process) be well related to existing employment sites such as the Gillingham Business Park and planned employment within Lidsing (14 ha employment hub is proposed here) the retail hub of the Hempstead Valley Shopping Centre and recreational assets such as the Capstone Country Park. It will also be demonstrated through the ecological baseline information already undertaken for this area, that significant biodiversity net gain can be secured within this development scenario and that climate change will be at the heart of decision making.
- There are benefits of a permanent and comprehensive growth strategy for this corridor where Medway residents, near and far, have certainty about what will be delivered. We believe the planned scale of green infrastructure for this corridor, alongside the development areas and linkages with the existing communities, will provide comfort to residents living in this area who have in the past, perceived that sanctioning some development in this area will destroy its character or function in a piecemeal fashion. This concern will not be relevant if the opportunity of a comprehensive masterplanned approach is taken, because of the single land ownership of the Attwood family, as evidenced on the attached plan.





Client		DA VINCI HOUSE, 44 SAFFRON HILL LONDON, EC1N 8FH T. +44(0)20 3640 8508 W. mail@kcapnprojects.com			
K D Attwood and Partners					
Project	Lidsing Garden Community	Job Ref.	22-M003	Drawn by	ND
		Scale	not to scale	Checked by	PD
Drawing Title	Capstone Valley Landscape Framework	Drawing no.	017	Date	21.02.2023
				Rev. A	24.02.2023



27<sup>th</sup> October 2023

Catherine Smith

Head of Planning Policy - Medway Council

Gun Wharf, Dock Road

Chatham ME4 4TR

Dear Ms. Smith

**Regulation 18 Consultation – Setting the Direction for Medway 2040**

**Urban Regeneration Site (FP10) – Former St John Fisher Catholic Comprehensive School**

Eutopia Homes is a developer with expertise in delivering urban brownfield sites. We start from the ground up and work with some of the leading design and placemaking practices to create long-term communities. At the heart of all of our projects, is a sustainable ethos, be that proximity to local transport hubs or utilising offsite construction techniques, to reduce waste. We currently have a development pipeline of over 1800 residential units. Eutopia Homes creates homes across the complete housing spectrum from affordable housing, private for sale and the private rental sector.

Eutopia Homes (Kent) Ltd acquired the former St John Fisher Catholic Comprehensive School ('the site') from the Education Commission for the Roman Catholic Archdiocese of Southward (RCAOS) in March 2023. We are currently progressing a development option for the site and have commenced pre-application discussions with the Council.

The disposal of the site formed part of a wider school improvement strategy involving the delivery of a new school at City Way, Chatham. The latter is now open and can accommodate over 1,100 pupils and incorporates all weather and grass pitches, a three-court multi-use games area (MUGA) and four-court indoor sports hall. The site is surplus to RCAOS educational requirements following the construction of the new school and is now identified as an '**Urban Regeneration' opportunity site** in the Medway Local Plan Regulation 18 document with potential to accommodate identified housing capacity.

The Council's recently published Interim Land Availability Assessment (LAA) considers the site and it has been given the following Site ID Reference: **FP10**.

Whilst we are currently undertaking pre-application discussions with Medway Council (Lead Officer – Nick Roberts), the work undertaken to date shows that the site has the development potential to deliver circa 140-170 new homes on the site (this reflects our previous 'Call for Sites' submission).

We note that Stage 2 of the LAA is underway and involves estimating each development potential of identified sites. It is critical that this should not be an exercise of simply applying an arbitrary / capped density per hectare thresholds for relevant sites. Such an approach would fail to optimise the use of sites which can evidently deliver high density development in accessible locations.

Eutopia Homes supports the New Local Plan's growth strategy as *'the Council's starting point is regeneration and making the best use of vacant or underutilized brownfield sites'* (Para 5.19, Reg 18 document). It similarly supports the notion that *'Urban regeneration does not mean a standard approach to density and design, but the consideration of the most appropriate approach in different areas'* (Para 5.20, Reg 18 document)

Applying density thresholds on identified 'Urban Regeneration' sites restricts the most efficient and effective use of suitable, available, and achievable sites (key criteria for Stage 2 of the LAA) without giving full consideration to its development potential through the development management process.

The number of dwellings achievable on a site should, of course, only properly be judged as part of the development management process through the submission of a planning application and as such a capped threshold approach should not be set through the Stage 2 process of the LAA – particularly in the case of 'Urban Regeneration' sites.

Whilst a plan-led approach is necessary in order to set the parameters for development, any emerging allocation should be flexible in terms of capacity and not preclude making the best use of vacant, brownfield sites. Such sites should be able to provide for a variety of unit types including flatted development (for those starting on the housing ladder and downsizers) rising up to larger scale family accommodation in order to address identified housing need.

We trust these comments are helpful in consideration of the Stage 2 LAA, as well as next iteration of the New Local Plan and we look forward to bringing forward much need housing on the site in collaboration with both the Council's planning policy and development management team.

Yours Sincerely

Lorna Henderson MRTPI  
Director

Email: [REDACTED]





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## **Future Medway Local Plan 2040**

### **Response to the Regulation 18 Consultation – Setting the Direction for Medway 2040**

#### **Land at Flanders Farm, Peninsula Way, Hoo St Werburgh, Rochester, Medway ME3 6QE**

**On behalf of AC Goatham and Son**

**Prepared by:**

Thomas Ogden BSc (Hons) MRICS MBAIC AssocRTPI

**Date:** 30 October 2023

**Job Ref:** 01.002.1437

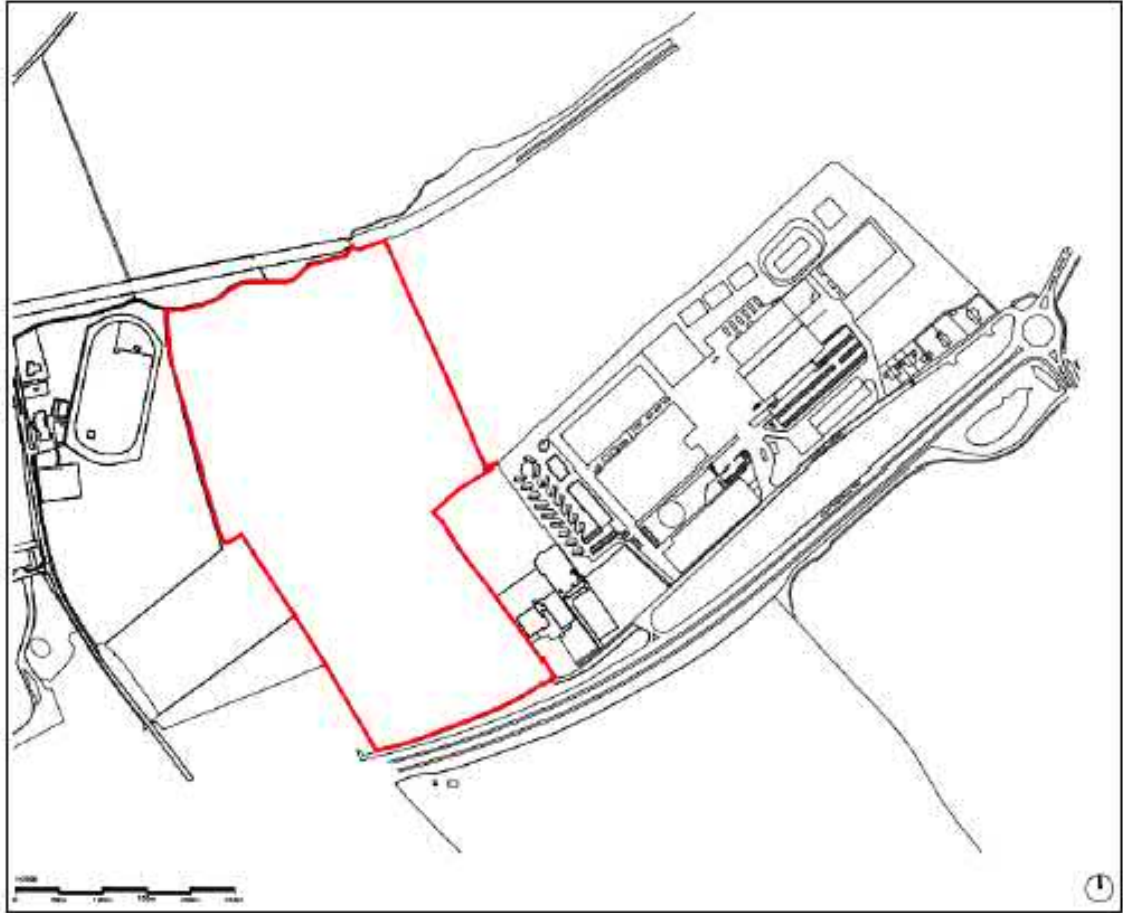
# 1. Introduction

- 1.1. We are writing on behalf of our client, AC Goatham and Son, in respect of the Medway Council's Local Plan – Regulation 18 Consultation Report-Setting the Direction for Medway 2040.
- 1.2. This representation promotes a site extending to approximately 13.8 hectares on the northern side of the Peninsula Way, Hoo St Werburgh, Rochester, ME3 6QE, west of the Deansgate leisure centre and east of Homeleigh Nursery.
- 1.3. Historically, the site has been given the reference SO2 as part of the 2018 *Local Plan Development Plan Considerations* in which it was identified by the Council as “*A site with opportunity for development subject to availability*”. The site is and will remain available.
- 1.4. In 2019, the site was further considered as part of the *Medway Strategic Land Availability Assessment (SLAA) 2019* when part of the site (the southern part which was then the only part promoted) was identified as “*Suitable, Available and Achievable*”.
- 1.5. In 2020 Medway Council released the Planning for Growth on the Hoo Peninsula document. This, together with land to the north of the site, identified the site's potential as part of an opportunity area of incidental growth around “*Indicative Neighbourhood centres*”. The extent of this was shown on the “*Opportunities*” map.
- 1.6. The site formed part of a pre-application submission (PRE/20/2978) presented to Medway Council in early 2021 and that then proposed that the southern part of the site form a business hub. The Council's pre-application response, dated 21<sup>st</sup> April 2021 confirmed that an employment/business could be included within the wider strategic growth plans for the Hoo Peninsula and that “*this area of Goatham's land would be an ideal location for such a development given its proximity to the transport network and vehicular connectivity*”.
- 1.7. The site, which is owned by AC Goatham and Son provides an opportunity to provide a development site in the Hoo Peninsula rural development area. This site could contribute to the Council's substantial housing requirements within the district, especially when joined with the neighbouring sites and identified as part of the plan.

- 1.8. It is considered that the site provides an opportunity for additional housing and or mixed development, and hence, positive growth in the Medway area to 2040.
- 1.9. This representation responds to the current Regulation 18, by setting out how the site meets the aspirations and broad spatial strategy being promoted in the Local Plan, specifically in the rural area. In addition to responding to each of the headings in the consultation document, and identifying how the site can deliver the vision and objectives through sustainable development.

## 2. Context

- 2.1. The production of the Medway Local Plan has involved several key stages. Three stages already having been completed, the 'issues and options' (Regulation 18) completed in 2016, the 'development options' (Regulation 18) completed in 2017, and the 'development strategy' (Regulation 18) completed in 2018. This consultation, 'setting the direction for Medway 2040' (Regulation 18) consultation, marks the fourth consultation phase and the final Regulation 18 consultation before the publishing of the Regulation 19 draft plan.
- 2.2. The current consultation period considers why the Council needs to plan for Medway's growth. It refers to aspects of Medway that need to be safeguarded for the future, such as beautiful landscapes and historic buildings. The consultation document also outlines potential options for building new homes, workplaces and services, such as schools and surgeries.
- 2.3. It is understood that this consultation does not detail policies or identify those sites preferred by the Council for new development, but does relay key areas where development could come forward.
- 2.4. This representation seeks to promote a 13.8 hectare site on the northern side of the Peninsula Way / Ratcliffe Highway, Hoo St Werburgh, Rochester, ME3 6QE, the extent of which can be seen at **Figure 1** below and on the attached Site Location Plan.



**Figure 1 – Extract showing extent of site promoted as part of the Local Plan.**

- 2.5. This site has previously been promoted for development through the 2008 Call for Sites and more recently the 2023 Call for Sites exercise undertaken by Medway Council, the Local Planning Authority (LPA).
- 2.6. The recently published interim Land Availability Assessment for Medway (September 2023) does include an assessment of the site, with site reference HHH19. This document recognizes the site **does not** comprise “*Habitats Sites*”, *Irreplaceable habitat*” and is **not** an “*Area at risk of flooding*”. It is on this basis that **the site is recognized as capable of delivering 5 or more dwellings, or economic development of over 0.25 ha** and which is **recommended to proceed to Stage 2**.
- 2.7. The strategic location and size of the site provides the opportunity for the delivery of a residential scheme with potential economic development which could be developed in isolation or more strategically with the neighbouring sites.

### 3. Site description and history

- 3.1. The site is well located next to existing and proposed development in a sustainable location. The proximity of a proposed pedestrian crossing to the south further supports good connections to existing and proposed bus links, pedestrian and cycle paths, which will all link well with Hoo St Werburgh.
- 3.2. Allocation of the submission site would form part of the “Deangate Ridge” allocation set out within the Ho Development Framework (HDF) document, recognised as forming part of a “Vibrant and Sustainable” neighbourhood. This allocation therefore supports a logical extension of the framework area.
- 3.3. Historic ecological assessments that have been undertaken across the site which indicate there is no likely impact as a result of the proposal. Further investigation would be carried out as development proposals for the site progress. In accordance with emerging statutory requirements, development would also provide opportunities to achieve 10% Biodiversity Net Gain in order to provide a clear and tangible ecological enhancement over the existing baseline condition of the site. In this case, given the blue and green infrastructure opportunities identified by the Council in the immediate locality through the HDF document, it is perceived that development on this site could well exceed this.
- 3.4. Allocation of the site for residential development would be consistent with the objectives of the NPPF which seek to support sustainable development in accordance with the environmental, economic and social objectives. Development would make a significant contribution to each of these as set out at Paragraph 8 of the NPPF.
- 3.5. There are no known constraints that would prevent development of the site, and further detailed assessments would be provided to accompany any future planning application to address any perceived site-specific issues.

## 4. Deliverability

4.1. Paragraph 68 of the National Planning Policy Framework ('NPPF') requires for plan-making, local planning authorities ('LPAs') should identify and update a supply of specific deliverable sites sufficient to provide 5 years-worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of. Furthermore, specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan need to be clearly set-out.

4.2. The Glossary of the NPPF defines deliverable and developable as following:

*"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

*a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*

*b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years".*

*"Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".*

### Availability

4.3. AC Goatham, who own the site, have confirmed that the site is available. On this basis, and subject to its inclusion in the Local Plan, the site can become available in the first 5 years of the Local Plan period.



#### Suitability for Residential Development

- 4.4. The site is located on the main Ratcliffe Highway route, which directly accesses the Peninsula Way between the settlements of Hoo and Chattenden. It is served by good public transport services and a wide range of services/facilities. There are no perceived constraints that could not be overcome to facilitate residential development.
- 4.5. The site would be suitable for housing development, as a highly sustainable and logical extension to the settlement of Hoo and immediately adjacent to the Deansgate leisure centre. If the site were to come forward for a mixed residential / economic development, it could also sit comfortably with the adjoining existing and proposed site uses.
- 4.6. The site would form a positive approach to housing delivery in Medway. At an average 30 dwelling per hectares, often advocated in rural areas, the site could have an indicative capacity of up to 415 units; and depending on any possible allocation for economic and or retail purposes.

#### Achievability

- 4.7. Subject to the grant of necessary planning permission, the site is realistically capable of delivering development in the early phases of the Plan period. Development viability will be assessed by taking into account the affordable housing requirements, other obligations and market conditions at the time when development proposals are promoted through the planning application process. At this stage, there is no indication to suggest that there will be any viability issues for housing development on this site.

## 5. The vision for Medway in 2040

- 5.1. The NPPF (paragraph 20), sets out that strategic policies should *‘set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for [amongst others]:*
  - a) *housing (including affordable housing), employment, retail, leisure and other commercial development’;*
- 5.2. Furthermore, the National Planning Policy Framework (‘NPPF’) requires that in order to boost housing supply, local planning authorities (‘LPAs’) should identify a supply of specific deliverable sites sufficient to provide 5-years’ worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of housing.
- 5.3. The consultation report highlights in paragraph 5.4 that *“It has to be recognised that there is a housing crisis, particularly regarding affordability and there is an absolute need to provide the right homes in the right places to meet Medway’s growing needs and the requirements for those desperately needing a good quality home”*. It goes on to acknowledge that many existing residents are living in over-crowded and / or sub-standard housing conditions.
- 5.4. It is important that the protection of the intrinsic character and qualities of a site or an area are considered, but these qualities can be protected when new housing development is delivered, through good design and by improving the sustainable networks and access to places and services. Rather than seen as negative, new housing development should be seen as an opportunity to improve the area for the current and future residents delivering the types and quantity of homes that are desperately needed. On this basis, respectfully, reference to ‘housing delivery’ should be made in the vision.
- 5.5. It is submitted that the development of the site, either delivered in solo or in conjunction with the adjoining proposed development sites could form a housing-led scheme which could be an option to deliver not only the existing elements of the vision for Medway, but could also deliver important housing numbers in the Medway area early-on the plan period. The site is both available and the development of the site is achievable.

## 6. Strategic Objectives

- 6.1. Paragraph 119 of the NPPF sets out that *'planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'*.
- 6.2. It is set out in the current consultation that *"The role of the Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment"*.
- 6.3. In order to deliver the Local Plan, it is proposed that the plan is set around strategic objectives. *"The objectives will feed into the wording of policies and how sites and different locations are assessed for potential development. The objectives are presented around broad themes for the environment, communities, economy, and investment in infrastructure and design that is fit for the future"*. This representation **supports** the use of objectives to deliver the strategic aims of the plan, but wishes to raise the following comments regarding the individual objectives:

### Objective: Prepared for a sustainable and green future

- 6.4. The objective to support action against climate change and a sustainable future for Medway is **supported**. This actively meets the aspirations of paragraph 153 of the NPPF which sets out that *'Plans should take a proactive approach to mitigating and adapting to climate change'*.
- 6.5. This representation promotes the delivery of a site in the rural area to help deliver 14,736 homes as a way, amongst others, that could deliver a sustainable and green future for Medway.

- 6.6. Paragraph 5.41 of the Regulations 18 consultation, sets out that *“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”*.
- 6.7. This statement is supported and the site provides an opportunity to deliver this strategy.

Objective: Supporting people to lead healthy lives and strengthening our communities

- 6.8. Section 8 of the NPPF provides guidance on ‘*Promoting Healthy and Safe Communities*’. The proposed objective in the Medway Local Plan actively meets this objective and is therefore **supported**. But, respectfully it is considered that there is an **omission** in how the objective is drafted.
- 6.9. The intentions of the third bullet point, proposes to strengthen the role of Medway's urban, neighbourhood and village centres...” This position is supported, but it is considered that ‘rural extensions’ should also be included in this objective, especially, as the rural development sites are included within the proposed spatial strategy for delivering growth.

Objective: Boost pride in Medway through quality and resilient development

- 6.10. This representation **supports** the provision of quality and resilient development in Medway and we support the Council's recognition that growth does not mean losing character of an area.

- 6.11. The second bullet point sets out that sustainable development should be directed to the *“most suitable locations that can enhance Medway’s economic, social and environmental characteristics”*. This stance is supported, as it acknowledges that development of both brownfield and greenfield sites can come forward to meet the housing requirement. The most suitable locations that can enhance Medway’s economic, social and environmental characteristics should be utilised to deliver the housing requirement of the area.
- 6.12. An allocation for development of the site could provide an opportunity to deliver this objective, in a development which meets the aspirations of sustainable development, directing development to the most suitable locations.

## **7. Strategic objectives**

- 7.1. The level of housing need required for the Medway area identifies a requirement for 1,667 homes a year in Medway, which provides a total figure of around 28,500 homes to be delivered before the end of 2040. This figure could further be increased, as it is identified in paragraph 5.11 of the consultation that Medway Council are currently considering a request from Gravesham Borough Council to increase capacity by 2000 homes to help meet the housing need of their district.
- 7.2. In March 2023 Gravesham Borough Council produced its Five Year Housing Land Supply Statement, covering the period 2022-2027. This document sets out that Gravesham only has 2.9 years of deliverable housing supply. In accordance with the Gravesham Local Development Scheme (January 2023) the new Local Plan for Gravesham is not expected until December 2024, and thus, the Borough’s Housing Land Supply (HLS) is not likely to improve in the near future. The high likelihood of Medway having to absorb some of this housing need should not be ignored in the early stages of Local Plan creation for Medway.

- 7.3. It is understood that Medway Council are still establishing final housing need numbers, due to the Council raising concerns with the Government derived figures, and the basis and calculations on which final numbers are determined. However, it is made clear in paragraph 5.13 of the consultation that the Council will look to find potential site allocations enough to provide for 19,000 dwelling units, the additional 7500 sites being provided through extant supply.
- 7.4. We wish, respectfully, to raise an **objection** to this approach advocated by paragraph 5.13 because the acknowledged uncertainty in the number of housing numbers required to be delivered, means that a more proactive approach, by allocating more sites, should be taken.
- 7.5. The Council should be looking at allocating more sites, to meet a potential increased capacity, in the Local Plan to ensure that there is an appropriate buffer should there be an additional requirement for housing in the Medway area, rather than relying heavily on delivering the target number of 28,500 homes.
- 7.6. The site, could provide a reasonable alternative and an additional site on the outskirts of Hoo for additional housing development.

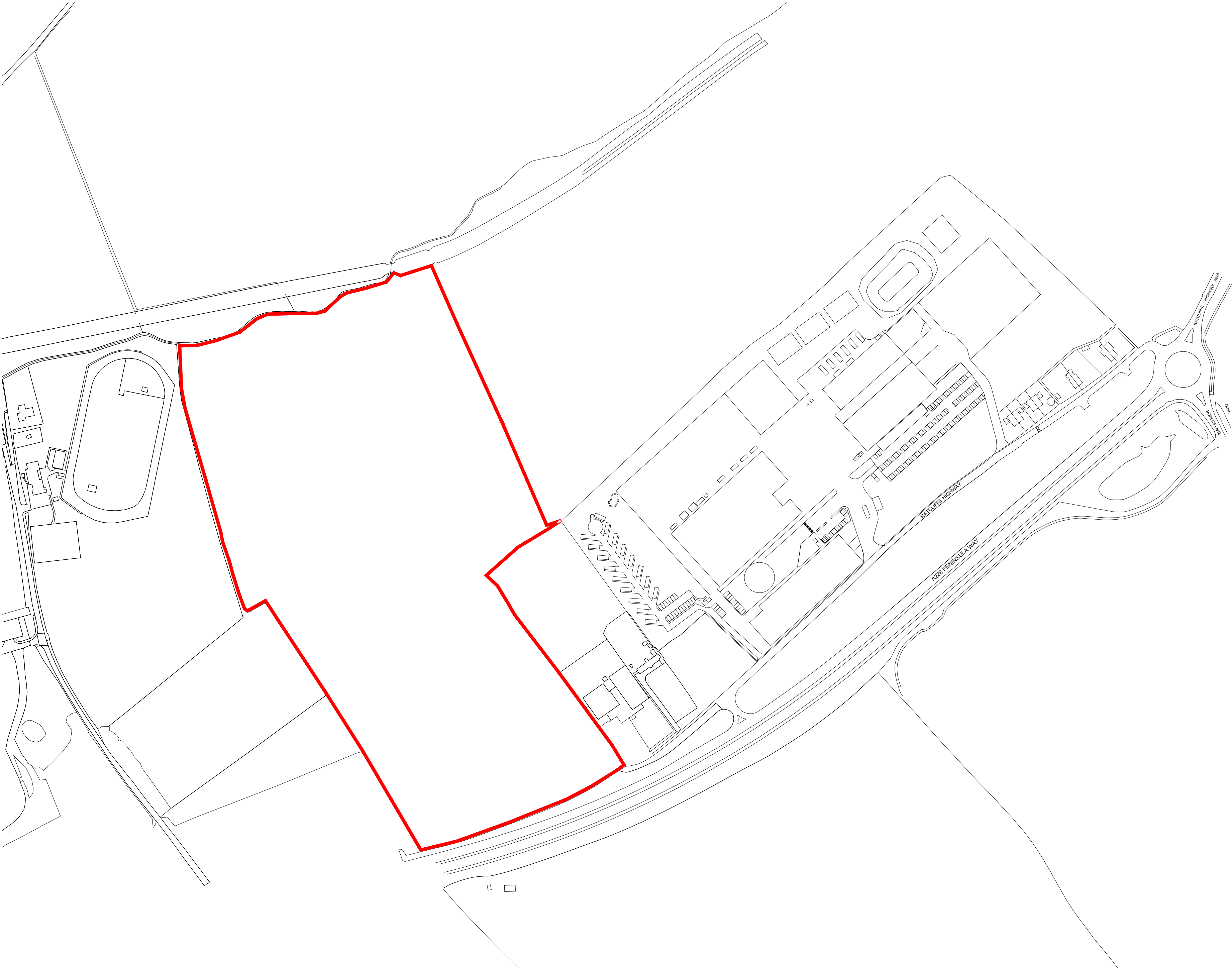
#### The Rural Development Areas

- 7.7. This representation **supports** paragraph 5.40 of the consultation, which sets out that the Hoo Peninsula provides a significant opportunity for the “*development for homes, jobs and services*”.
- 7.8. This representation **supports** the approach to utilise the Housing Infrastructure Fund (HIF) program to deliver improvements to transport and put measures in place to strengthen the local environment in the Hoo area.
- 7.9. In accordance with Paragraph 5.41 of the 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.



## 8. Summary

- 8.1. It is considered that the provision of housing development being delivered through rural development is supported. On this basis, the site provides an opportunity to deliver much-needed housing development within close proximity to the settlement of Hoo St Werburgh and without any identified constraints.
- 8.2. The site proposed for development on *Land at Flanders Farm* (site HHH19), should be supported in the Stage 2 assessment having already been supported in the Land Allocations Assessments (LAA) document, as a potential site allocation in the Future Medway Local Plan 2040.



Notes:

Issued for Planning

Revision:	Rev By:	Checked By:
A. 23.02.2023	RB	BY



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**Client:**  
AC Goatham & Son

**Project:**  
Site Representation

**Site Address:**  
Flanders Farm  
Ratcliffe Highway  
Rochester, ME3 8QE

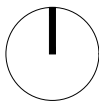
<b>Scale:</b> 1:2500 @ A2	<b>Drawn By:</b> RB
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<b>Date:</b> 23.02.2023	<b>Checked By:</b> BY
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**Drawing Title:**  
Site Location Plan

St: | Job No: | Drawing No: | Rev:

P.2267.010.A



## Blowers Wood (HW6) – Medway Regulation 18 Representation

Representation ID: 1554

Regulation 18 Local Plan	Comment
<p><u>3. Vision</u> Para 3.1 Vision for Medway in 2040 <i>The plan's vision is to establish Medway as a leading regional city, connected to its surrounding coast and countryside; with a thriving economy, where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets.</i></p>	<p>Contrary to the requirements of the NPPF (para 15), the “Vision” fails to identify the provision of housing and employment 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 in relation to housing and new employment, the Plan also fails to be positively prepared to provide a suitable framework for addressing housing and employment needs. The “Vision” must be amended at para 3.1 to reference housing and employment provisions and the supporting text amended to include a reference to the delivery of c.28,500 new homes.</p>
<p>4. Strategic Objectives Prepared for a sustainable and green future</p> <ul style="list-style-type: none"> <li>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', and reduce the risk of flooding; promoting the use of nature-based solutions to climate change; seeking to protect the most vulnerable groups from the impacts of climate change; and supporting major shifts in modes of transport used to reduce carbon impacts.</li> <li>To strengthen and develop transport networks providing safe and effective choices for sustainable travel, including improved opportunities for walking and cycling</li> </ul>	<p>As set out in the Plan (para 4.1), the objectives are to “<i>feed into the wording of policies and how sites and different locations are assessed for potential development</i>”. It is therefore notable that there is no strategic objective dealing expressly with the amount of housing that needs to be delivered. 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).</p>

<p>and enhanced public transport services, and management of the highways network, with associated improvements in air quality.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• To ensure the effective management of natural resources, including water and soil, and improving air quality, providing for the sustainable supply of minerals and minimising the production of waste, enabling it to be managed as far up the Waste Hierarchy as possible.</li> </ul>	
<p><b>Supporting people to lead healthy lives and strengthening our communities</b></p> <ul style="list-style-type: none"> <li>• To provide for high quality energy efficient homes that meet the housing needs of Medway's communities, reflecting the range of sizes, types and affordability the area needs, including provision for specialist housing, such as for people with disabilities, gypsy and traveller accommodation, the elderly including those wanting to down size, students, first homes, and custom and self-build housing; and drive reductions in the carbon impacts of housing in new developments and securing opportunities for retro-fitting older properties.</li> <li>• 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</li> </ul>	<p>The objective mentions that of housing will be delivered, but not the quantity which is a determining factor in deciding the most appropriate spatial strategy to inform the future strategic policies (NPPF para 20 and 23). As per the NPPF (para 11), this should also reflect as a minimum the objectively assessed need (28,500 new homes or 1,667 per annum). In the absence of clearly setting out how the housing requirement meets its need the Council's sites assessment for development cannot be considered as "Positively Prepared" or "Justified" as per para 35 of the NPPF.</p>

<ul style="list-style-type: none"> <li>• 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. To strengthen the role of Medway's urban, neighbourhood and village centres, responding with a positive strategy to changes in retail; supporting independent retail and start-ups, encouraging new business uses into the High Street; securing a range of accessible services and facilities for local communities close to where they live; and realising opportunities for homes and jobs, with the main Town and larger village Centres providing a focus for new retail and community facilities and cultural activities, within the context of the distinct towns, neighbourhoods and villages that make up Medway.</li> </ul>	
<p><b>Securing jobs and developing skills for a competitive economy</b></p> <ul style="list-style-type: none"> <li>• To boost the performance of the local economy by supporting local businesses to grow and innovate; and attracting inward investment and re-locations, through the provision of a portfolio of good quality employment land that meets the needs of businesses; and to secure and extend higher value employment opportunities; and reduce out-commuting.</li> <li>• Build on existing strengths and expertise, such as engineering, energy and creative industries, and raise the profile of key sectors, to attract and develop the jobs of the future.</li> </ul>	<p>With regards to the spatial objectives more generally, the general principles are supported. However, they further highlight the need for the amount of development (housing and employment) to be expressed as an objective, since many of the other objectives depend 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.</p>

<ul style="list-style-type: none"> <li>• To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses; and improve graduate retention.</li> <li>• 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.</li> <li>• To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services.</li> <li>• To support growth in tourism, cultural and creative industries, extending the offer to include green tourism and city breaks, including realising opportunities in the domestic tourism market.</li> </ul>	
<p><b>Summary</b></p> <p>The strategic objectives as currently drafted do not provide a “Sound” basis to inform the development strategy, site selection or future planning policies, 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 with respect to 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). Urban Regeneration will not meet the objectively assessed need on its own and therefore, it is also submitted that there will need to be Greenfield development if the Council are to realise the delivery of their housing need.</p>	
<p><b><u>5. Developing a Spatial Strategy</u></b></p> <p><b>Development needs</b></p> <p>5.1 The Local Plan will include a Policies Map, which will show how land is allocated for new development, such as housing and</p>	<p>The consultation document (para 5.3) sets out the development needs of Medway, identifying a current housing need of 1,667 homes per annum (pa) or circa 28,500 over the Plan period (2022-2040). Paragraph 5.4 casts doubt about whether this is an appropriate figure. However, it is considered essential that the Plan</p>



<p>employment, and where land is protected, such as environmental designations for nature and landscape. The Policies Map and Key Diagram help to communicate Medway's spatial strategy – how we are planning for the future.</p>	<p>seeks to deliver development that meets Medway's objectively assessed need in <u>full</u>.</p>
<p>5.2 A Local Plan should be positively prepared for sustainable development. It should not be used to stop development that is needed for our growing and changing communities. The Plan should seek to direct and manage growth, so that it provides land for homes, jobs and services, as well as protecting the area's natural resources and historic features.</p>	<p>As a <u>minimum</u>, the objective to meet the objectively assessed need in full is supported, as required by National policy, since this could contribute to a worsening housing supply and affordability, if there is consistent under delivery of housing in this part of Kent (particularly 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 (up to 2,000 homes), to ensure the Plan is "Positively Prepared" (NPPF, para 35).</p>
<p>5.3 Government directs Local Planning Authorities to use its 'Standard Method' in determining the scale of housing needed over the plan period. This Standard Method formula for Local Housing Need identifies a need for 1,667 homes a year in Medway, or around 28,500 over the plan period to 2040. This level of housing need is greatly higher than rates of housebuilding seen in Medway for over 30 years. The formula reflects dated demographic projections and has been heavily criticised across the country and there is currently some uncertainty with Government policy. At the time of writing, the Government had not yet published its response to the consultation on revisions to the National Planning Policy Framework, which included consideration of the Standard Method formula.</p>	<p>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 significant boost the supply of homes (NPPF, para 60).</p>
<p>5.4 The Council has raised concerns in Government consultations about the Standard Method. A key matter for Medway is the marked</p>	<p>The Council has consistently failed to deliver against its housing requirement since 1986, with it last meeting its requirement in only</p>

<p>variation in levels of housing needs generated by the Standard Method based on projections from 2014, in comparison to use of more recent demographic projections for Medway's growth. This matter was considered in the Medway Housing and Demographics report supporting the Local Housing Needs Assessment published in 2021, and is illustrated in Figure 1 below, which is an extract from the report. The dwelling-led Standard Method scenario is clearly significantly higher than use of other approaches to forecasts. The Government considers that this method is appropriate to meet its housebuilding ambitions to tackle pressures in the housing market. Notwithstanding the concerns regarding the methodology, it has to be recognised that there is a housing crisis, particularly regarding affordability and there is an absolute need to provide the right homes in the right places to meet Medway's growing needs and the requirements for those desperately needing a good quality home. There are many existing residents in Medway living in over crowded and/or substandard conditions which is unhealthy or living at home with parents well into their late 30's because they simply cannot afford to live independently in the area they wish to continue to live.</p>	<p>two years back in 2008/09 and 2009/10. This has no doubt contributed 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).</p>
<p>5.6 The Council is collating a comprehensive evidence base to inform the new Plan. All potential sites will be assessed for their ability to deliver sustainable development, considering constraints and mitigations, and how they could meet the objectives of the Sustainability Appraisal and objectives for the Plan. The Council needs to demonstrate that the growth strategy set out in the Plan can be delivered, to provide certainty and confidence in Medway's growth. Potential sites and locations will be tested against a range of criteria, including transport impacts and viability.</p>	<p>This evidence base is still being written. The Regulation 18 Local Plan still relies on evidence bases such as the ENLA (2015 and the Housing Needs assessment 2021. The evidence base for the local plan needs updating to reflect current circumstances within Medway to allow to be positively prepared the needs of the area.</p>
<p>5.7 Work to date has highlighted some critical constraints. National Highways has indicated that there is insufficient capacity in parts of</p>	<p>It is acknowledged that any strategy for growth will need to address any identified critical constraints. It is submitted that the potential</p>

<p>the Strategic Road Network to accommodate significant growth. National Highways has identified capacity and safety concerns with M2 Junction 1. Although this is outside of Medway's boundary, it is a key junction for the area, and many residents and workers travel through this junction regularly. There are no plans to upgrade this junction as part of National Highway's plans for the Lower Thames Crossing (LTC). Without a clear scheme in place to address these issues, development of jobs and homes across north and mid-Kent will be stymied. The Council is working with neighbouring authorities and wider stakeholders to prioritise action on M2 Junction 1. This matter would need to be addressed in the Local Plan, with policies showing how impacts could be mitigated and improvements delivered.</p>	<p>presence of such constraints means that a balanced strategy of growth across urban, suburban and rural areas is likely to be most appropriate, to avoid development and growth being concentrated in one area of the district.</p>
<p>5.10 Further consideration will be given to potential impacts on the environment, especially the designated habitats and landscapes which form a large part of Medway's area, and strategic infrastructure needs. The Council will need to assess how negative impacts can be avoided, or mitigated, such as through delivery of new services.</p>	<p>This will need to be demonstrated through the updated evidence base the Council provides to support the local plan moving forward. At this time it is something that cannot be commented upon as we do not know what the evidence/considerations are to date.</p>
<p>5.11 In addition to assessing how to meet Medway's needs for 28,500 new homes over the Plan period, the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham's housing needs, following a request from the neighbouring borough.</p>	<p>It is submitted that it will be important, in order for the Plan to be positively prepared (NPPF, para 35), to proactively look to accommodate the additional homes required to meet Gravesham's needs, since not doing so risks contributing to a worsening housing supply and affordability, if there is consistent under delivery of housing in this part of Kent. 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.</p>

<p><b>Potential land supply for development</b></p> <p>5.12 The housing needs for Medway over the plan period of 2022-2040 is for 28,339 homes. Providing for a buffer to allow for some sites not coming forward for development would lift the total plan period need to over 29,000 homes.</p>	<p>A pipeline supply includes 2,061 homes under construction as of 31 March 2023 is identified. It is difficult to determine whether the pipeline supply is reliable. The Council should make it clear through its future evidence base how units delivered before 2022 have not been counted towards the overall supply.</p>
<p>5.13 There is an existing 'pipeline' of sites with planning permission for over 7,500 homes, not yet built, which contribute towards meeting the total need in the Plan. Authorities can also make allowance for 'windfall sites' – those that come forward for development outside of Local Plan allocations. Taking account of these two sources of supply, the Council is assessing options to make provision for site allocations for over 19,000 homes to meet needs in Medway.</p>	<p>The Council can refer to historic windfall delivery (para 71 of the NPPF). However, the Council has not had an up-to-date Local Plan for 20yrs. Most housing sites have therefore, come forward are not allocation and are therefore windfall sites. This significantly distorts the windfall delivery rate.</p> <p>The 3,000 dwellings proposed for windfall allowance therefore seem optimistically high. In the absence of any detailed evidence, it is considered that the Council does 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.</p>
<p>5.15 The LAA has identified land with the potential capacity for circa 38,200 homes, which will proceed to the next stage of detailed assessment, along with the Sustainability Appraisal process. Many of these sites are subject to constraints, including environmental considerations, infrastructure requirements and viability. It is likely that many of these sites will not be found suitable, available and achievable for sustainable development and will be removed at the next stage of assessment and Sustainability Appraisal. A range of mitigation measures will be required to achieve the scale of housing needed for the Plan. The scale of proposed growth is anticipated to have significant impacts across Medway. This level of housebuilding would mean the transformation of urban centre and waterfront areas and large-scale development in suburban and rural areas.</p>	<p>As the consultation document notes it is very likely that a number of sites identified in the LAA will not be suitable, available and achievable for development. In order to deliver the full growth needed in Medway it will be important to proactively allocate appropriate sites which are able to deliver development, taking a balanced strategy to deliver growth across urban, suburban and rural areas of the district. Urban regeneration sites often come with additional pressures on viability which can lead to schemes delivering less affordable homes, as well as often delivering a high proportion of flatted units. In contrast suburban and rural schemes are often able to more quickly deliver a mix of units, including affordable dwellings, in a quicker timescale, so form an important part of a balanced approach.</p>

5.17 These broad locations are considered in more detail below.	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. The preferred development option is "a mixed approach of the 4 residential development options". As set out urban regeneration sites, whilst important, have issues which are not present with suburban and rural sites so a balanced approach is crucial.
<b>Urban Regeneration</b>	No comments applicable in this section as the site is a Suburban Growth option
<b>Suburban Expansion</b>  5.29 This category considers the areas for potential growth adjoining the existing urban areas to the south and east of Medway. These are largely located to the north and east of Rainham and in the Capstone and Hempstead area to the south. The existing suburban neighbourhoods are home to many of Medway's residents, and key services and employment areas. The undeveloped land around the suburbs is valued as a contrast to the large urban conurbation, providing important green lungs within an otherwise dense urban area and includes the popular country parks at Capstone and Riverside. Historically these areas have been important for farming, such as the north Kent fruit belt, from which the county gets its recognition as the Garden of England. There are key landscape links to the estuary in the north and the Kent Downs to the south. Car ownership rates are higher in this part of Medway, and there are congestion hotspots on the highways network, particularly along the A2.	Redrow Homes South East agree with this development option and currently has an option and live planning application for site HW6 (Blowers Wood), which is allocated as an expansion site. Site HW6 is one example which demonstrates that suburban expansion will form an important part of housing supply within the plan period on the basis that it can bring forward deliverable and achievable sites within sustainable and appropriate locations for growth within the plan period.

<p><u>Opportunities</u></p> <p>5.30 The large towns and neighbourhoods in the south and east of Medway are popular places for people to live. Developers are actively promoting land in this area through the Local Plan and planning applications. Development on the green field sites in this category would be expected to be built out quickly, responding to market demand and more limited site constraints than brownfield sites.</p>	<p>Site HW6 already has an ongoing application (MC/23/0284) on the land for 88 dwellings in accordance with the Stage 1 LAA assessment. The application is on a greenfield site and is, therefore, less constrained than the urban regeneration brownfield sites and can therefore start delivering homes within the first 5 years of the plan period meeting the Council needs including 25% affordable housing.</p>
<p>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.</p>	<p>Site HW6 has a public footpath GB40 running directly through it, which provides a suitable pedestrian link to Hempstead Valley at the wider Hempstead and Gillingham to the north. The site is connected via established pedestrian footways to nearby public bus stops along Wigmore Road to the east and at Hempstead Valley Shopping Centre, providing frequent services to Chatham, Maidstone, Wigmore and Twydall. The National Express bus also stops at Hempstead Valley, taking passengers to Dover and Victoria. In terms of road connectivity, the adjacent M2 provides direct links to surrounding towns as well as the M25 and London.</p>
<p><u>Issues and Constraints</u></p> <p>5.32 Much of the land around the north and east of Rainham is the best and most versatile farmland, although many fields are not in active agriculture use. The area to the south is within the setting of the Kent Downs Area of Outstanding Natural Beauty, and undeveloped land forms an important component of our green infrastructure networks. The area to the north lies close to the Medway Estuary, which is designated a Special Protection Area, Ramsar site and Site of Special Scientific Interest, recognising its international and national importance for wildlife.</p>	<p>The site lies within the countryside in planning policy terms and within the designated Area of Local Landscape Importance, but is not subject to any other landscape designations. The site has been assessed as being Grade 3A agricultural land. The site is well contained in landscape and visual terms by existing boundary vegetation and by the existing woodland to the northwest, with the current planning application accompanied by a Landscape and Visual Assessment which concludes that any development would be capable of successfully integrating into the local surroundings without any unacceptable landscape or visual effects.</p>
<p>5.33 The A2 is an important transport corridor, but experiences congestion and has been designated an Air Quality Management</p>	<p>The current application on site HW6 contains an Air Quality Assessment which indicates that once operational, the proposed</p>



Area. There is a risk that major development in these suburban locations could generate further dependencies on car-based travel, adding to congestion and pollution, and undermining Medway's ambitions for sustainable development. Much of the potential development south of the M2 is anticipated to travel towards the M2 via junction 4 which may need to be improved to accommodate additional traffic.	development will generate traffic movements on the local road network. A qualitative assessment of the potential impact of the proposed development on air quality was undertaken and the proposed trip generation is low in comparison to the existing traffic flows and below the necessary screening criteria. Therefore, the proposed development is not expected to have significant effects on local air quality at nearby receptors.
5.34 Although potential sites could be developed in proximity to existing towns and neighbourhoods, there is not sufficient capacity in existing services, such as schools and health services, to cater for an increased population. New housing would need to make provision for expanded and new services. Similarly, schemes that focus on homes and not jobs and services could result in unsustainable development and increase people's need to travel.	Any development on site HW6 will provide appropriate and scaled financial contributions to enable the provision of adequate services to be provided in alternative locations across the borough. As mentioned previously, the site is well connected by pedestrian footways to local services and therefore the need to travel can be done sustainably and reduce reliance on cars.
5.35 Land in this area lies close to Medway's boundary with neighbouring authorities, particularly Swale and Maidstone. Development in these locations would potentially have a cross-border impact. Development to the east of Rainham would erode the strategic gap between Rainham and Newington and add further to the congestion and pollution issues on the A2. Development to the south around the Capstone Valley would potentially adjoin the development of the proposed 'Lidsing Garden Community' in Maidstone. The landowner is promoting a cross-border masterplan. There are a number of potential impacts, including transport, infrastructure and the natural environment.	Whilst site HW6 lies close to Medway's boundaries, it is enclosed on all sides by existing woodland and is a strategic site that rounds off the development at Hempstead. This will not erode the strategic gap between Medway and Maidstone as there are significant open fields to the west of the site and the proposed development will not give way to any proposed expansions in the future due to the contained site.
<b>Rural Development</b>	No comments applicable in this section as the site is a Suburban Growth option
<b>Green Belt Release</b>	No comments applicable in this section as the site is a Suburban Growth option

# Enclosure 1

## Homes England response to Medway Local Plan Regulation 18 Consultation Document

### Vision

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

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

Homes England are supportive in principle of the proposed Vision, which appears to consider a wide range of matters that will be essential to ensure Medway is a successful, attractive and high-quality place for residents, businesses and visitors in the future.

As the Government's Housing and Regeneration Agency, Homes England are supportive of the aspiration that *"all sectors and ages of the community can find decent places to live."* This aligns with the objectives outlined in our Strategic Plan to create high-quality homes in well-designed places that respond to local priorities.

The Vision appears to focus employment development on "brownfield" land, such as *"derelict sites at Grain and Kingsnorth"*. However, Medway should also acknowledge in the Vision that *"vacant brownfield land"* will be utilised for delivering residential growth.

Given the scale of proposed housing growth in Medway, Homes England consider that the Vision should also reflect the fact that Medway will be delivering significant increases in housing during the Plan period, and therefore, should include a reference to the level of sustainable housing growth envisaged.

The Vision sets a framework for the area's growth to 2040. We note that the plan period used in this Regulation 18 document is from 2022-2040 (paragraph 5.12). The National Planning Policy Framework (September 2023, paragraph 22) states that:

*"Strategic policies should look ahead over a minimum 15-year period from adoption... Where larger scale development such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery."*

We consider that the Vision is not consistent with national policy if it only looks ahead to the year 2040. We note that the Council's Local Development Scheme (October 2022) states that Adoption is anticipated in Autumn 2025. To allow for any slippage in the Local Plan programme, and to align with monitoring years, it is considered that

2041 should be the minimum Plan period. However, given the potential to incorporate large scale development to meet the Council's housing needs over the Plan period, it would be more appropriate to include a vision that looks 30 years ahead to the year 2056 to be consistent with national policy.

## Strategic Objectives

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

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

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

Homes England acknowledge that the strategic objectives will underpin the emerging Vision. Similar to the response to Question 1, the Agency is supportive in principle of the proposed strategic objectives, particularly in relation to:

- The aim to *"meet the housing needs of Medway's communities reflecting the range of sizes, types and affordability the area needs,"* under the objective *"Supporting people to lead healthy lives and strengthening our communities."* It is recommended that any policy in relation to housing mix incorporates some flexibility to ensure it is effective and can allow for consideration of additional or updated evidence as demand may change over time to reflect market conditions and the economic climate. Not only is this essential to create a successful place that responds to the needs of the local community, it is critical if the Plan is to be positively prepared to comply with the National Planning Policy Framework (NPPF) (2023) paragraph 35a. Homes England's proposed development at Lodge Hill will support these objectives through the delivery of new homes across a range of sizes, types and tenures, offering increased choice within the local area.
- The regeneration of Medway and *"making the best use of brownfield land"* under the objective to *"Boost pride in Medway through quality and resilient development."* Homes England supports the aspiration to encourage development on brownfield land, which is a key aspect of NPPF paragraphs 119 and 120. The Agency would like to highlight that brownfield sites are not exclusive to the urban cores or waterfront of Medway, and so suggest the wording is updated to reflect that brownfield development outside these locations will also make an important contribution to the future place. Homes England considers that land at Lodge Hill is a suitable and sustainable location for housing and mixed-use development.
- The aim *"to lift the standards of sustainability and quality in all new developments"* and *"to deliver on the Council's commitment to addressing the Climate Emergency"*. There is a positive synergy between these and the objectives outlined in Homes England's Strategic Plan, for example, around placemaking, quality and sustainability.
- The objective *"to secure jobs and develop skills for a competitive economy."* The significant housing growth requirements in Medway will also result in boosting the local economy providing further job opportunities.

Housing and employment growth will need to be considered collectively to ensure sustainable future patterns of growth.

## Developing a Spatial Strategy

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

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

### Developing a Spatial Strategy

#### Development Needs

##### Housing Numbers

The Council calculate Local Housing Need to be 1,667 homes per annum. Avison Young have cross referenced this and confirm this is an appropriate annual figure based on the standard method calculation using the 2014 Household projection figures (from 2023 and 2033) and the 2022 affordability ratio figure (published in 2023), which results in a requirement of 1,667 dwellings per annum, which is comparable with the Council's figure. Use of the Standard Method figure to determine the minimum number of homes in the emerging Medway Local Plan is consistent with the NPPF, Paragraph 61.

The Council indicates that the housing needs for Medway over the Plan period of 2022-2040 is 28,339 homes and providing for a buffer would lift the total need to over 29,000 homes. Whilst the inclusion of a buffer is supportive as it would ensure flexibility in supply should sites not come forward, this should be 20% to reflect the Council's record of under delivery in recent years. This is discussed in further detail below. However, the Plan period identified (2022 – 2040), covers 18 years which would actually result in 30,006 dwellings if the 1,667 dwellings per annum figure is applied. As stated in our comments made in response to Question 1 on the Plan period, we would suggest the Council consider adopting extending this to at least 2041, which would indicate a housing need of at least 36,000 homes (including our recommended 20% buffer) in the period 2022-2041.

Medway Council should adopt a strategy which, as a minimum, seeks to meet the areas Objectively Assessed Need (OAN) and is informed by agreements with other authorities so that unmet need from neighbouring authorities (such as the 2,000 homes identified by Gravesham) is accommodated in Medway *"where it is practical to do so and is consistent with achieving sustainable development"* (NPPF paragraph 35a). Whilst the proposed Levelling-up and Regeneration Bill reforms to the NPPF could amend it, the Duty to Cooperate is still a legal requirement at present and the reforms propose something similar, albeit currently referred to as an "alignment" policy. Therefore, it is important for the Council to consider how it could increase its own housing requirement and supply to address some of these unmet needs, otherwise the Plan may be considered not legally compliant or positively prepared.

In addition to the above, and the approach to meeting OAN as an absolute minimum, Homes England considers that it will also be important to assess the level of homes required to support economic growth. In order to be

consistent with paragraph 82 of the NPPF, policies should seek to address potential barriers to investment such as inadequate housing.

#### Land Supply

We note that Medway Council has identified 7,583 homes in the 'pipeline' and a further 3,000 homes as windfall development in the Plan period. Evidence is required to support and justify these supply figures. It is important that the data underpinning these figures is signposted and available to ensure the residual number regarding the allocations of housing sites is robust and deliverable. This will ensure both the targets and overall Vision of the emerging Local Plan are achievable.

If there is insufficient evidence to support the pipeline and windfall numbers adopted, additional housing allocations should be considered to ensure Medway's Housing need.

The Council is proposing a buffer of 661 homes for the Plan period, which represents an uplift between need and supply of less than 5%. The NPPF (Paragraph 74) suggests that a larger buffer is required. This is particularly the case given the recent undersupply demonstrated by the Housing Delivery Test (2022). A buffer of 20% would comply with the NPPF and would ensure choice and competition in the market for land. A 20% buffer would provide the clarity and certainty needed to demonstrate that the Local Plan has been prepared positively and would deliver the new homes needed.

#### **Strategic Level Comments:**

We note that Medway Council have identified 5 broad locations for growth (option 1 – urban; option 2 – sub-urban; option 3 – rural; option 4 – green belt and option 5 – employment). In relation to these broad categories, we note the following:

- The emerging Local Plan identifies that a minimum of 19,173 homes will need to be allocated, albeit for the reasons outlined above it is considered this will be higher.
- To meet this requirement, Medway Council will need to pursue a mix of the growth options proposed to ensure a robust development strategy that meets the test of soundness, ensures a resilient housing trajectory over the Plan period and provides a mix of housing to respond to differing local demand. It is also important to highlight that a minimum of 19,173 homes could not be delivered in any one individual location for growth assuming all sites pass the Council's Site Assessment process (i.e. 'Rural Development', the highest category at 14,736 potential homes, wouldn't be sufficient to meet Medway's housing needs alone).
- All potential housing allocations and employment allocations will be tested in more detail as the Plan progresses alongside the Council's Sustainability Appraisal and site selection process. The Council need to review all the sites assessed to ensure that the housing and employment supply proposed in the emerging Local Plan is robust and deliverable. In relation to sites submitted, the Council must be assured that they are available, suitable and deliverable in the Plan period, particularly if they are to be allocated for early delivery.
- The Regulation 18 Consultation document recognises National Highways' concerns that capacity and safety at M2 Junction 1 will stymie development of jobs and homes across north and mid-Kent, unless a clear scheme to address the issues is put in place. It is understood that Medway Council and neighbouring

authorities are working collaboratively with National Highways to identify how impacts of Local Plan growth could be mitigated, and improvements delivered, in order for the Council to 'plan positively' for growth in meeting their OAN and addressing any infrastructure constraints. The Council's transport evidence base, developed in consultation with National Highways, will need to demonstrate how this can be achieved.

- Existing planning applications are being held in abeyance until an acceptable scheme to address the M2 Junction 1 traffic capacity and road safety concerns of National Highways is devised, which is a serious consideration for the emerging Local Plan. The work being undertaken by transport consultants appointed by Medway Council to carry out traffic impact appraisals and mitigation work on M2 Junction 1 by the end of 2023 needs to consider the longer-term growth to be delivered through the draft Local Plan, as well as addressing any immediate concerns around local network capacity.
- The Vision and strategic objectives in the draft Local Plan articulate an aspiration to deliver sustainable development that will minimise traffic growth, address the culture of dependency on private cars and will promote containment of trips and enable sustainable transport choices. This needs to be demonstrated through a robust transport evidence base that considers the strategic and local transport network, as well as bus service and active travel improvements and opportunities.
- Homes England also advocates an approach that considers locations of employment alongside housing growth to ensure sustainable development outcomes. Economic Growth envisaged in the urban areas and on the Hoo Peninsula should therefore be coupled with future housing development, otherwise there is a risk the Plan could have unsustainable patterns of development.
- The Council states that many of the growth locations are subject to constraints including environmental considerations, infrastructure requirements and viability. It is imperative that the Council's evidence base is robust to ensure sustainable outcomes are achieved in the emerging Local Plan.

### **Broad Category Comments**

The following provides Homes England's response to the proposed housing growth options:

#### Urban Regeneration

Urban regeneration can be transformational for existing places and communities, therefore, is likely to play a role in shaping the future of Medway. Nonetheless, this type of development can face a number of challenges and site constraints, for example around existing uses, occupiers, multiple-landownerships and abnormal costs impacting viability. This could mean urban regeneration schemes are more likely to be delivered over the medium-longer term. Accordingly, it will be important for Medway Council to demonstrate that these sites are deliverable over the Local Plan period.

#### Suburban Growth

Suburban regeneration can also make a contribution to growth in Medway coupled with other scenarios. The Regulation 18 consultation material does however identify a number of constraints to development in this location, such as the potential loss of Best and Most Versatile agricultural land and impacts on the Medway



Estuary Special Protection Area (SPA). The Council's site assessment of this growth option should be mindful of the cumulative impacts on these constraints to ensure that the overall strategy is appropriate.

#### Rural development

The reference to a "Rural" approach to accommodate growth is potentially misleading as it implies there is a limited range of existing development, services and/or facilities in this location. Based on the Regulation 18 consultation material, this growth option appears to be largely focused on the Hoo Peninsula and so moving forward it may be better described as the "Peninsula" approach to accommodate growth.

Homes England recognises that this growth option will be required to ensure a clear and varied strategy for accommodating Medway's OAN in full. Homes England support the Council's view that there is significant land for potential development of homes, jobs and services on the Hoo Peninsula. The delivery of multiple uses in this location will provide a range of benefits and therefore aligns with NPPF paragraph 120 (a).

A significant amount of work has been undertaken to date to explore development on the Hoo Peninsula. For example, the Hoo Development Framework (2022) outlines *"there is potential for development on the Hoo Peninsula as part of the wider growth strategy for Medway"* and that *"proposals for housing and economic development on the Hoo Peninsula have been included as options at different stages of consultation on the emerging Local Plan over recent years"*. This evidence base should not be ignored and already forms a basis by which to consider a realistic proposition for growth on the Hoo Peninsula.

A benefit to delivering development through the "rural"/Peninsula approach is that it will provide additional services and facilities, which meet the needs of both future and existing residents. This is therefore likely to reduce the need for residents to travel and so will encourage more sustainable lifestyle choices.

The Regulation 18 consultation document identifies the need for sustainable transport improvements within the "rural"/Peninsula area as a means to mitigate capacity issues on the road network. The need to upgrade the transport network alongside increasing sustainable transport choices should be informed by a robust assessment to ensure a sound approach to plan-making.

Consideration also needs to be given to the opportunity for containment of trips within the Hoo Peninsula to avoid impacts on the strategic road network. This could be achieved, in part, through the delivery of a mix of development types and it is noted that the two major employment sites are identified on the Hoo Peninsula.

The Regulation 18 consultation document recognises the need to consider potential impacts of development on different aspects of the natural environment. This aligns with the objectives in Homes England's Strategic Plan that seek to enable sustainable homes and places, maximising their positive contribution to the natural environment whilst minimising their environmental impact. Given the presence of a number of significant nature designations on the Peninsula and within the wider "rural"/Peninsula growth option, Medway Council should consider the preparation of a strategic vision for enhancing ecological networks within the wider landscape. This would enable a holistic approach to managing sensitive ecological designations, whilst unlocking development opportunities. Whilst site specific assessments would be necessary to support any development site, the wider strategic ecological vision could include proposals for:

- Standoff buffers between proposed development footprints and the nature designations (i.e. SSSI).
- Improvements to the existing boundary treatments around sensitive ecological areas.
- Vegetative screening to mitigate potential visual and noise disturbance.
- Opportunities to deliver Biodiversity Net Gain, in order to provide new natural habitats that could also help to screen sensitive ecological areas from development.
- Proposed access management improvements taking account of protected habitats to ensure that future public access is managed sensitively.
- In the context of significant housing coming forward, there may be a requirement to balance this with delivery of high value habitat creation proposals, which could provide an important contribution to the emerging Kent and Medway Local Nature Recovery Strategy on the Hoo Peninsula, providing enhanced landscape connectivity, bolstering habitats and species associated with the SSSIs and ultimately improving the long-term resilience of SSSIs in the context of wider development pressures.

#### Green Belt release

Paragraph 140 of the NPPF states that *"once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans"*. Paragraph 141 only allows for Green Belt boundary amendments where it can be demonstrated that as much use as possible has been made of brownfield and underutilised land, densities have been optimised and where it has not been possible to accommodate need elsewhere. Therefore, if Medway Council intends to release Green Belt land for development there is a requirement for a robust evidence base, including a detailed Green Belt Assessment and an exhaustive site selection process, particularly given there currently appears sufficient sites elsewhere to meet the Council's housing and employment needs.

Only a small proportion of Medway's administrative area is Green Belt, which is related to the adjoining authority of Gravesham. It would therefore seem appropriate for any Green Belt Assessment to be conducted with adjoining authorities to ensure any wider Green Belt impacts can be understood, particularly in the context of any unmet need arising from these adjoining authorities.

#### Employment Sites

The Regulation 18 consultation material identifies opportunities for strategic employment allocation at Grain and Kingsnorth on the Hoo Peninsula. To ensure sustainable patterns of growth it will be essential to ensure that housing/employment are considered in tandem, which should therefore strengthen the role that the "rural"/Peninsula approach plays in accommodating Medway's future housing.

## Land Availability Assessment

**Medway Council has published an interim Land Availability Assessment.**

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

#### **Land Availability Assessment (LAA)**

The Land Availability Assessment (LAA) identifies circa 447 sites, of which 146 valid submissions were received through the Call for Sites exercise in early 2023. It is important that these sites are thoroughly assessed to determine those that are available, suitable and deliverable for allocation in the Plan period.

There is also the need to follow correct process in selecting sites and taking account of reasonable alternatives to ensure the Plan is justified. The Council's Sustainability Appraisal and other evidence that informs the wider site selection process should incorporate a robust approach in the consideration of alternatives to assist the Council in putting forward a sound Local Plan.

It is important to highlight that a number of the sites included in the LAA have been assessed by Medway Council previously and were found to be appropriate for allocation. This includes the proposed allocation of Chattenden Barracks, which has been included in the withdrawn Local Plan (October 2021) and draft Hoo Development Framework (September 2022). A lot of the analysis carried out by Medway Council will not have changed and, if sites continue to be available, they are likely to remain suitable for allocation to be consistent in assessment.

It should also be acknowledged that the scale of sites play an important role in enabling housing development to come forward. The ability to deliver housing at pace on small to medium sized sites will ensure that the housing delivery can come forward earlier in the proposed Plan period compared to longer-term strategic proposals (potentially those involving greenfield sites).

#### **Land at Lodge Hill**

As part of this Regulation 18 consultation, Homes England are promoting two sites within the Lodge Hill estate for development:

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

These sites were promoted previously to the Call for Sites Submission in February 2023. The Council's subsequent Land Availability Assessment (October 2023) identifies the sites separately: Lodge Hill Camp incorporating the former Recreation Ground (HHH1) and Chattenden Barracks (HHH3). Homes England are pleased that the LAA identifies sites HHH1 (Lodge Hill Camp) and HHH3 (Chattenden Barracks) will both be considered in more detail for potential allocation at the next stage of the emerging Local Plan.

To support the Council in their future assessment, a Vision Document has been prepared and submitted alongside this written response. This sets out the development aspirations for Lodge Hill Camp and Chattenden Barracks (including the recreation ground) alongside technical information, which demonstrates that both sites are suitable, available and achievable for the proposed development.

The remainder of this section provide a high-level summary of the justification for the allocation of these two sites; however, Medway Council are asked to review the Vision Document for the detail of the proposals.

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

The NPPF requires local authorities to prepare local planning policies that are aspirational but deliverable. In relation to *"identifying land for homes"*, NPPF paragraph 68 states that:

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

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

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

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

#### **Available now:**

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

#### **Suitable for development:**

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

Medway Council has recognised that there is significant land for the potential development of homes, jobs and services on the Hoo Peninsula in both the Regulation 18 consultation material (September 2023) and Hoo Development Framework consultation document (dated 22 September 2022). Moreover, the latter identifies Chattenden Barracks as a residential-led development opportunity.

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

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

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

Furthermore, Homes England has undertaken a significant amount of technical work that informs the suitability of the sites for development. This work is comprehensive covering, ground conditions, ecology, transport, heritage, and a level of initial assessment of contamination (in particular unexploded ordnance (UXO)). Alongside this consideration has also been given to the local property market. The Vision Document demonstrates that whilst some of these matters will influence the design of future development proposals, they do not impact the suitability, as such both sites are considered suitable for the proposed development.

#### **Achievable:**

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

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

- Medway is a Council that faces challenging housing delivery targets. Planning policy requires that there is a step change in delivery and the emerging Local Plan will be the principal vehicle to deliver this radical change. Homes England, as the Government's Housing and Regeneration Agency, are seeking to develop up to 500 homes on Chattenden Barracks and a mix of uses, potentially including residential on Lodge Hill Camp. The delivery of these sites, including much needed affordable homes, could therefore make a material contribution to meeting the local housing need.
- Homes England has acquired Lodge Hill to ensure that, in line with historic planning policy, it is regenerated. Government policy is to make effective use of land in meeting the need for homes and other uses in line with Section 11 of the NPPF.

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

## **Conclusions**

Homes England is generally supportive of the Council's Vision, strategic objectives and overarching spatial strategy. It is supportive of an approach that incorporates the "Rural"/Peninsula option and in particular agrees that there is significant land for potential development for homes, jobs and services on the Hoo Peninsula, making as much use as possible of brownfield sites.

The supporting Vision document and high-level summary demonstrates that both Lodge Hill Camp and Chattenden Barracks provide excellent opportunities to deliver high-quality and sustainable growth that will have a positive impact on the wider place, particularly Chattenden. These sites are available, suitable and deliverable for development and could make an important contribution to Medway's growth strategy.

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# **MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE**

**Land at Lower Bloors Lane, Lower Rainham**

CLIENT: Mr Zammit and Mr Jhalli

**ID: 1564**

**SITE ID (CALL FOR SITES): RN14**

OCTOBER 2023  
DHA/17122/17124



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# 1 INTRODUCTION

## 1.1 PURPOSE OF THE STATEMENT

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- 1.1.1 This representation have been prepared on behalf of Mr Zammit and Mr Jhalli 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 For absolute clarity, this representation refers to the ID generated by Opus: **1564**.
- 1.1.3 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?
- 1.1.4 In answering the above questions, it has been further demonstrated how the land at Lower Bloors Lane 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).
- 1.1.5 The site at Lower Bloors Lane was submitted in the initial Call for Sites, and has the reference RN14.
- 1.1.6 These representations must be read alongside the on-line form/platform which as been completed.

## 1.2 SUMMARY

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- 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 consistently failed to deliver against its housing requirement since 1986, last meeting its requirement in only two years back in 2008/08 and 2009/10, resulting in a significant housing need, both market and affordable;
- 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 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) requires the inclusion of strategic policies which 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

### 1.3 STRUCTURE OF THE DOCUMENT

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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 promoted (Land to the west of Lower Featherby Road) setting out the reasons why the site should be considered for an allocation;
- **Chapter 6** - Sets out the preferred spatial strategy and why this represents the most suitable and thus "Sound" option.
- **Chapter 7** - Provides additional commentary 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 COMMENTS ON THE PROPOSED VISION

---

- 2.1.1 The “Vision” for Medway encompasses broad policy principles for the future emerging Local Plan covering transport, employment, the environment, retail, waste and minerals.
- 2.1.2 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.
- 2.1.3 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. Indeed, the overarching principles for the “Vision” fails to identify housing at all (para 3.1) as forming an important component of the Plan.
- 2.1.4 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).
- 2.1.5 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.*

- 2.1.6 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.
- 2.1.7 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.*

- 2.1.8 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 7<sup>th</sup> paragraph (un-numbered) could be amended as follows:

*The Plan will seek to deliver 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 outline changes are essential to ensure the Plan is “Positively Prepared”, “Consistent with National Policy” and therefore “Sound” (NPPF, para 35)

## 2.2 SUMMARY

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- 2.2.1 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 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 from sustainable and green future;
  - Supporting people to lead healthy lives and strengthen our communities;
  - Securing jobs and developing skills for a 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, 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 must be expressed as an objective, since many of the other objectives are dependent 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

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- 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, it must be clarified 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, last meeting its requirement in only two years back in 2008/08 and 2009/10. This has no doubt led 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 significant 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
<b>1986/87 - 2021/22</b>	<b>27,407</b>	<b>35,727</b>	<b>-8,320</b>

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 pa, equivalent to 28,312 homes up to 2040 (circa 28,500 homes). The below section reviews 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

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- 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

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- 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. Through 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 the “Urban Regeneration” spatial strategy. There is therefore a high potential for double 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**

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- 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 distinct categories, which form the different spatial strategy options are as follows:
- Urban regeneration;
  - Suburban growth;
  - Rural development; and
  - Green Belt loss.
- 4.2.12 The remainder of this section analyses the capacity of each category for potential housing delivery identified in the LLA.

### **Urban Regeneration Sites**

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- 4.2.13 Map one of the consultation document provides an overview of the potential sites for urban regeneration across Strood, Chatham and Rochester encompassing small medium and large sites. The urban regeneration sites make up the second largest element of the potential supply, with the potential to deliver 11,151 homes.
- 4.2.14 We have significant concerns regarding the reliability of this supply on the following basis:
- The development potential of many of the sites has been known about for some time, but they have failed to come forward, including within more economically buoyant times, because of issues of viability or technical constraints;
  - The Peel Ports site is known to have complex landownership/leasehold constraints. This is without addressing any individual site constraints such as contamination and whether redevelopment of the Site is financially

feasible. There are therefore significant concerns over its delivery which cannot be relied upon;

- Similarly, Medway City Estate (promoted for mixed use development) also have complex landownership considerations and is very unlikely to be fully deliverable within the Plan period;
- The requirement to provide BNG is likely to be a significant constraint to brownfield sites coming forward, especially smaller sites. Whilst on the face of it, many of these sites might seem ecologically sparse, they often harbour more interesting habitats, which under the DEFRA Metric 4 trading rules are very difficult to replace elsewhere. Brownfield sites are also likely to wholly rely on off-site BNG provision. This is either likely to prevent some sites coming forward for reasons of viability (contributions for off-site provision are very high) or significantly reduce the development potential of some sites.

- 4.2.15 With the above concerns in mind, it is considered a conservative estimate that circa **3,500** dwellings of the sites within the urban regeneration category may not be deliverable in the proposed Plan period and based on previous urban regeneration delivery rates.

### *Suburban growth*

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- 4.2.16 Map two of the consultation document provides an overview of potential sites for Suburban Growth, with 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 due to long-standing concerns regarding deliverability due to issues of access and landownership, resulting in lapsed consents.

- 4.2.17 Taking the above into account, it is considered at least **3,123 homes** can be discounted from the potential supply of housing.

### *Rural Development*

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- 4.2.18 The consultation document sets out that through the LAA, that potentially 14,736 homes in the rural development strategy could come forward. The majority of the rural housing sites are on the Hoo Peninsula centred around the settlements of Chattenden, Cliffe, Cliffe Woods, Allhallows, Hoo St Werburgh, High Halstow, Lower Stoke and the Isle of Grain.
- 4.2.19 There are concerns relating to these sites, including a lack of infrastructure, unsustainable development, and the withdrawal of the HIF fund.



- 4.2.20 It is not fully known how development on the Hoo Peninsula will be impacted by the loss of the HIF funding. However, given the outlying nature of some of the other rural settlements on the peninsula such as Cliffe, Allhallows, Lower Stoke and Grain a conservative estimate suggests a loss of a minimum of 3,327 homes from the potential supply before discounting of sites from the Hoo expansion (previously identified in the Hoo development framework).

### *Green Belt Loss*

- 4.2.21 Just under 5% of land in Medway is designated as Green Belt. The areas of Green Belt form part of the London Metropolitan Green Belt and join land adjacent to Gravesham Borough Council and Tonbridge and Malling Borough Council. The Green Belt in Medway provides the strategic gap between Strood and Higham and between Snodland and Halling. The Council has identified the changing characteristics of the Green Belt due to the context of major infrastructure investment (the lower Thames crossing) as an opportunity for a limited number of homes in proximity to transport networks and services in Strood to be developed in the Green Belt providing new services as well as homes.
- 4.2.22 Where a site for potential Green Belt release conflicts with the five purposes of the Green Belt the site has been discounted from the supply although its contribution is limited.

## 4.3 SUMMARY

- 4.3.1 Overall, having reviewed the 447 sites identified in the LAA Stage 1 assessment, it is considered that from a potential supply of 38,216 homes, optimistically only 27,674 could be deliverable. See table 4.1 below. This is having regard to part delivery rates, known planning and infrastructure constraints, as well as considering whether the broad location and scale of development proposed is suitable given the site's location. Due the high-level nature of LAA a finer grain assessment of the suitability of the Site could not be undertaken. However, our assessment demonstrates that the potential supply as set out at para 5.16 cannot all be relied upon.

Category	Medway Potential Housing Capacity (From LAA)	DHA's view on Potential Housing Capacity (from LAA)	Difference in Supply
Urban Regeneration	11,151	7,651	3,500
Suburban Growth	9,680	6,157	3,123
Rural Development	14,736	11,229	3,147
Green Belt Loss	2,649	2,637	12

<b>Total supply</b>	<b>potential</b>	<b>38,216</b>	<b>27,674</b>	<b>10,182</b>
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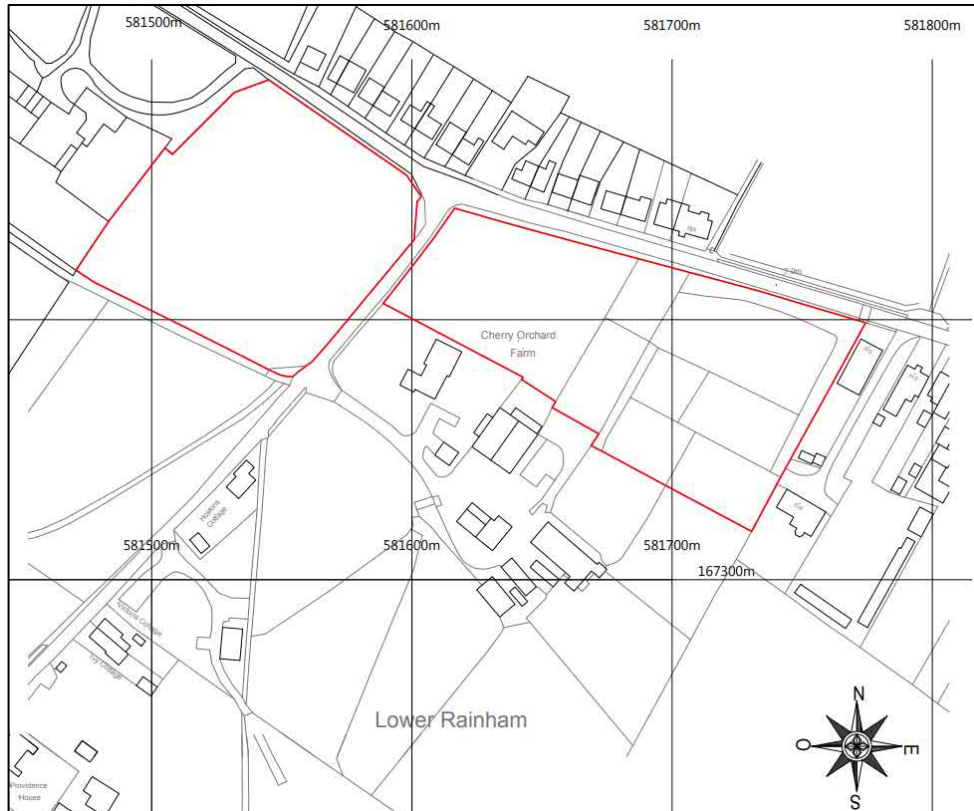
TABLE 4.1 SUMMARY OF DHA ASSESSMENT OF MEDWAY'S POTENTIAL HOUSING SUPPLY

- 4.3.2 In addition, the windfall site allowance at para 5.15 and Figure 2, is also optimistically high, and does not accurately reflect likely windfall provision going forward, taking into account the adoption of the Local Plan, allocation of new sites and other constraints to housing numbers such as BNG.

## 5 SITE

### 5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

- 5.1.1 The Site comprises of two agricultural field parcels, located on either side of Lower Bloors Lane, of circa 1.9ha in total. The site is located at the intersection between Lower Rainham Road (northern boundary) and Lower Bloors Lane (eastern boundary).



**Figure 1: Site location plan.**

- 5.1.2 In terms of immediate surroundings, there is a row of residential properties located to the north of the site, on the other side of Lower Rainham Road. Beyond this is fields and the Gillingham Riverside Country Park. The total site is bound to both the east and west by residential properties. To the south of the eastern parcel is a residential property and commercial units.
- 5.1.3 The public footpath GB5 runs from Lower Bloors Lane towards Rainham centre. The proposal includes a footpath on Lower Bloors Lane up to the footpath. In addition, there is a footpath over the railway line on the southern end of Lower Bloors Lane which provides a route onto Bloors Lane and into Rainham/Gillingham. There is also a footpath along the length of Lower Rainham Road.
- 5.1.4 The site is approximately a 20 minute walk towards Rainham centre, including Rainham train station. Rainham station provides services into London, including

London Victoria and St Pancras International, and towards the Kent east coast. Destinations including Faversham, Margate and Ramsgate.

- 5.1.5 In respect of accessibility, the site is considered accessible and sustainably located adjacent to the Urban Area boundary.
- 5.1.6 Rainham urban centre contains a wide variety of day-to-day services and facilities including schools, employment, grocery stores, medical services, retail and leisure facilities.

<b><u>Service/amenity</u></b>	<b><u>Distance</u></b>
Three Mariners Inn	250m
Sundar Rachana	275m
Berengrave Service Station	450m
The Angel Pub	900m
Bloors Lane Community Woodland	400m
Berengrave Nature Reserve	500m
Rainham Cricket Club	750m
Rainham station	1.15km
The Railway PH	1.2km
Riverside Primary School	1.45km
Granary Evangelical Church	1.10km
Tesco superstore	1.36km
Thames View Primary School	890m
Rainham Mark Grammar School	1km
Twydall Primary school & Nursery	1.77km
St Thomas of Canterbury Primary School	1.8km
Tesco Extra	1.9km
St Thomas of Canterbury R C Church	1.37km

**Table 1- Nearby services**

- 5.1.7 The site forms part of the North Kent Fruit Belt Character Area, within the Lower Rainham Farmland Area. The area has seen a reasonable amount of development since the Medway Landscape Character Assessment was produced.
- 5.1.8 In the last few years, Lower Rainham Road and the surrounding area has seen a significant amount of planning applications. The result is such that while the site is outside of the current built confines, the experience on the ground is that the area is very much urban in experience.
- 5.1.9 Lower Rainham Conservation Area is located to the west of the site, and there are a number of nearby listed buildings. It would be expected that any allocation would include a requirement for some landscaping buffer to the nearby heritage assets.
- 5.1.10 The Medway Estuary and Marshes is designated as a Ramsar Site and Special Protection Area, and located to the north of the site. There are also local and national nature conservation sites located further to the east of the site, beyond Berengrave Road.

- 5.1.11 An indicative layout has been prepared, and demonstrates how the site can comfortably fit up to 21no. dwellings, inclusive of a suitable landscape buffer to the heritage assets to the west.



**Figure 2: Indicative layout**

## 5.2 SUSTAINABILITY

- 5.2.1 At the heart of the NPPF is the presumption in favour of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). These being 'economic, social and environmental objectives'.
- 5.2.2 An economic role includes contributing to building 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. In this respect, the site is suitable, sustainable, available and deliverable for development, and would help contribute to Medway's immediate housing need with the provision of circa. 21no. high-quality new family homes. Moreover, household expenditure generated by future residents will help to support economic activity locally and help to sustain the jobs and services within the local area. The new dwellings will also contribute to the public purse in respect of developer contributions, Council Tax and the New Homes Bonus.

- 5.2.3 A social objective includes supporting strong, vibrant and healthy communities, by providing the supply of market and affordable housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being. The site could provide a high-quality residential development to meet the needs of the local population and will contribute to the social vitality of the Rainham community. The proposed development would provide additional homes in an accessible location close to services and facilities to meet this supply and therefore can positively contribute towards the social role identified in the NPPF.
- 5.2.4 From an environmental perspective, it is acknowledged that development of the site would result in development of a greenfield site. However, it is clear that the housing need in Medway cannot be met by a dwindling supply of urban sites and greenfield development is inevitably required. The development of an underutilised greenfield site sustainably located adjacent to the urban area close to services, facilities and public transport connections and at an appropriate and effective density is considered a preferable location in the context of sustainability objectives and simultaneously will make a modest contribution to reducing the need to develop into wider, more ecologically valuable and visually sensitive sites in the countryside.
- 5.2.5 We would highlight that for nearby developments on Lower Rainham Road the environmental impact of development land has been considered acceptable by the Council. The extensively proposed landscaping would help to mitigate the visual impact of the development, while also providing ecological benefits.
- 5.2.6 From a wider sustainability perspective, the proposal would not involve the loss of land that is of high ecological value and would not comprise development in an area of high flood risk.
- 5.2.7 In respect of achieving sustainable development, paragraph 8 of the NPPF confirms there are three strands that contribute to such development; social, economic, and environmental matters and that sustainable development should achieve gains in all three of these areas. These are considered below:

*Economic*

- The development would increase the choice and availability of housing in Medway.
- The increased population would have indirect benefits to local shops and services through additional expenditure.
- The construction of the new development would result in additional employment.
- The development would assist in maintaining existing bus services through increased patronage.

*Social*

- The site could provide a high-quality residential development that would cater for the housing need within the Borough.



- The development would include the provision of affordable housing, so would make a modest contribution towards the Council's social housing needs.
- The site is highly sustainably located, and future residents would be well placed with local services within a walkable distance.

*Environmental*

- The development will provide the opportunity to improve biodiversity and connectivity throughout the site through the provision of new planting and ecological corridors where possible. The site is currently relatively low in ecological potential.
- The sustainable location of the site ensures that there is an ability to reduce carbon emissions associated with private vehicle use through sustainable and active travel.

5.2.8 The site on Lower Bloors Lane is in a highly sustainable location and will enable all future residents to live sustainably. While the site is greenfield, the site is of low ecological value and its impact on the landscape can be suitably screened. The site should be considered in the context of a number of new developments along Lower Rainham Road.

5.2.9 While the heritage considerations are noted, a sensitively designed scheme can suitably mitigate the potential for harm. Similar comments are raised with regards to the ALLI designation, and the site is not considered to be a contributor towards the landscape given its context.

## 6 PREFERRED SPATIAL STRATEGY

### 6.1 PREFERRED SPATIAL STRATEGY

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- 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.
- 6.1.2 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.
- 6.1.3 However, having regard to the Site at Section 5, the preferred development option is "Suburban Expansion". In identifying our preferred option, we have also considered the pros and cons of the other development options.

#### Option 1 - Urban Regeneration

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- 6.1.4 This focuses on urban sites within Chatham, Strood and Rochester in and around the individual towns, high streets or on the waterfront of the River Medway.
- 6.1.5 For the reasons section under section 4, significant concerns are raised regarding the deliverability of many of these sites. Whilst in general we do not raise objection to the redevelopment of brownfield sites, these cannot form a significant component of the housing land supply, especially within the first 5 year because of the complexities involved with such sites coming forward.

#### Option 2 - Suburban Expansion

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- 6.1.6 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.
- 6.1.7 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, unlikely to be constrained by issues of viability, such as sites under Option 1.

#### Option 3 - Rural Development

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- 6.1.8 Focuses development to the north of the administrative area on the Hoo Peninsula. For the reasons identified under Section 4. There are significant concerns over the deliverability and reliability of substantial development coming forward under this spatial option. Whilst it might be possible that suitable smaller sites are allocated

to meet local housing needs, this spatial strategy cannot be relied upon to deliver the housing numbers purported in Table 1 of the consultation document.

#### **Option 4 - Green Belt Release**

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- 6.1.9 These are shown as sites adjacent to the administrative areas of Gravesham Borough Council that are adjacent to the settlement of Strood and in the strategic gap between Halling (Medway Council) and Snodland (Tonbridge and Malling Borough Council) adjacent to where each neighbouring Council are proposing urban extension or standalone new settlements to meet their housing need.
- 6.1.10 The need for green belt release only forms a very small part of the potential supply and should not be relied upon.

## **6.2 SUMMARY**

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- 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.

## **7 OTHER COMMENTS ON THE LAND AVAILABILITY ASSESSMENT**

- 7.1.1 The site at Lower Bloors Lane is in a highly sustainable location and will enable all future residents to live sustainably.
- 7.1.2 While the site is greenfield, the site is of low ecological value and its impact on the landscape can be suitably screened. The site should be considered in the context of a number of new developments along Lower Rainham Road.
- 7.1.3 While the heritage considerations are noted, a sensitively designed scheme can minimise and reduce the potential for harm. Similar comments are raised with regards to the ALLI designation, and the site is not considered to be a contributor towards the landscape given its context.

## 8 CONCLUSIONS

### 8.1 OVERALL SUMMARY

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- 8.1.1 Having regard to the submitted site, the preferred development option is "Suburban Expansion". In identifying our preferred option, we have also considered the pros and cons of the other development options.

## Medway Local Plan 2022 – 2040

### Regulation 18 Consultation

### Introduction

This Representation Statement has been prepared by Knight Frank on behalf of Redrow Homes Limited, who have an interest at Land East of High Halstow ('the site') and are the applicant for the Hybrid Planning Application (ref.MC/23/0855) submitted to Medway Council ('the Council', 'MC') in March 2023 for residential-led mixed use development. A site location plan is provided at Appendix 1.

This Statement is submitted to the Local Plan Issues and Options Regulation 18 ('draft Local Plan') public consultation currently being undertaken by the Council which closes on 31 October 2023.

### Summary of Recommendations

Overall, we support the preparation of a new Medway Local Plan, and our comments aim to help the Council prepare a sound and legally compliant plan that is submitted for examination and adopted in a timely manner.

In summary, we strongly recommend that Land East of Halstow is identified as a site allocation policy for future residential development in the new Local Plan for approximately 760 new homes. This should be set out in the Local Plan Regulation 19 which is expected to be published in 2024. The site is deliverable, as it is available for development, development is achievable and suitable, and the proposals for the site can deliver significant benefits to help the Council achieve its vision and strategic objectives. The site is located on the Hoo Peninsula (rural area) which can play an important role, alongside other locations for development, to achieve the Council's growth aspiration and meet development needs.

### Site Context

#### The site opportunity

The site comprises approximately 40.69 hectares of open arable farmland and is located to the east of the village of High Halstow, adjacent to the edge of the settlement. The site is situated on the Hoo Peninsula.

Significant work has been undertaken over a number of years, including discussions with the Council, Parish Council Neighbourhood Plan Group and other stakeholders, and promoting the site for residential-led mixed use development to the Council and preparing and submitting the planning application. The site is deliverable, it is available for development now, it is suitable for development and development is achievable.

#### Planning Application

The Hybrid Planning Application (ref.MC/23/0855) submitted to the Council in March 2023 by Redrow seeks to deliver a residential-led mixed use scheme for up to 760 new homes. The vision is to create a cohesive, high quality, attractive and sustainable extension to High Halstow, which retains the character and feel of the village, and is within an attractive landscape setting to create a well-integrated, connected, inclusive and vibrant place for new and existing residents to live and enjoy. The proposals include community facilities (including primary school and new centre), affordable housing, leisure and recreational opportunities, significant areas of open space, landscaping and environmental and ecological improvements.

#### Benefits of Development

The benefits of the proposed development are significant, and it will contribute towards achieving sustainable development. In summary, a range of social, economic and environmental benefits will be delivered including addressing local

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development needs, new employment, leisure and recreational opportunities, enhanced accessibility and environmental improvements.

### Planning History

The positive and sustainable development credentials of the site are clear and strong based on the fact that it has previously been identified for future development (up to 760 dwellings) in previously prepared MC planning documents including draft Local Plan and supporting evidence e.g. Hoo Development Framework. Albeit, the Council has now restarted the Local Plan preparation process, much of the evidence remains relevant and supports future development at the site.

The site was previously referred to as “Site 1113 Land East of High Halstow” in Local Plan documents and it is referred to Policy HH PQ4 “Land to the East of High Halstow” within the High Halstow Parish Council Neighbourhood Plan.

## Local Plan Issues and Options Consultation

This section provides our comments to the vision for Medway, the strategic objectives and spatial strategy set out in the Local Plan Issues and Options consultation.

### National Policy Context

As a starting point, Para. 35 of the National Planning Policy Framework (‘NPPF’) requires that any Local Plan submitted to the Secretary of State for examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the Plan is:

- **Positively prepared** – Providing 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** – An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – Deliverable over the plan 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** – Enabling the delivery of sustainable development in accordance with the policies in this Framework.

If the Local Plan fails to accord with the above requirements, it is incapable of complying with the NPPF.

Whilst NPPF Para. 35 relates to the Regulation 19 Local Plans, we consider it appropriate to bear these requirements in mind at Regulation 18 stage to ensure the spatial strategy and objectives of the Local Plan are sound from the initial stages of plan-making.

Overall, we support the preparation of the new Local Plan and the Council’s overall vision and objectives. Our comments on the draft Local Plan are set out as follows, in response to the draft Local Plan chapters.

### Chapter 3 – Vision for Medway in 2040

We support the overall vision for Medway Council.

Most importantly, the delivery of new homes (and communities) such as at High Halstow is central to successfully achieving the aspirations of the Council because new homes can deliver sustainable development in relation to social, environmental and economic objectives. Significantly, in line with the vision, new development can improve quality of life.

We recommend that the growth strategy (including future site allocations) is planned in a joined-up manner alongside securing new required infrastructure to support existing and new communities, as well as addressing environmental matters.

### Chapter 4 – Strategic Objectives

Overall, we support the Strategic Objectives.

Bringing forward development at the site, at High Halstow, would contribute towards achieving each strategic objective.

### **1. Prepared for a sustainable and green future**

We support the Local Plan initiatives in regard to tackling climate change and enhancing sustainability.

Development at the site, at High Halstow, would create a cohesive, integrated and highly sustainable extension to the village.

Sustainability is a core consideration of the proposed development at the site and by achieving rigorous energy standards and employing technologies such as air source heat pump ('ASHP') technology, the proposals respond directly to the Climate Emergency declared by Medway Council in April 2019.

Development at the site would seek to maintain and enhance ecological habitats, including the retention of existing tree / hedge lines along all the boundaries of the site, to deliver at least 20% biodiversity net gain.

### **2. Supporting people to lead healthy lives and strengthening our communities**

The site, at High Halstow, would provide a logical and sustainable extension to the east of the village and provide many opportunities for wider integration with nearby services and facilities to support healthy and active living and positive well-being for existing and new residents.

The proposed development will deliver 14 hectares of open space provision, which is more than the requirement based on MC's adopted standards. The proposals will provide at least or in excess of the requirement across all of the different open space typologies which will make a positive contribution towards encouraging healthy and active lifestyles.

The proposals will encourage healthy lifestyles, through the creation of a legible and walkable neighbourhood (in combination with the existing village). The proposed 2FE primary school, local centre, open spaces, and allotments are all highly accessible and are set within a high quality and attractive new neighbourhood and will be accessible to the existing and new residents.

### **3. Securing jobs and developing skills for a competitive economy**

The proposed development at the site, at High Halstow, will provide up to 760 new homes, a local centre, delivery of a new 2FE primary school, new open spaces and associated infrastructure and services. As a result, the new neighbourhood will generate a range of economic benefits, including new employment opportunities, both during the construction and operational phases.

The provision of a new local centre within walking distance that will create jobs and boost economic output across the Hoo Peninsula. The non-residential floorspace will provide a number of workplace-based jobs to contribute to the local economy of High Halstow.

Local spending will also increase in the local area, and the skillset of new residents will contribute towards the local workforce.

### **4. Boost pride in Medway through quality and resilient development**

The proposed development at the site, at High Halstow, has been designed to carefully take account of planning policy requirements as well as site characteristics for example local character, heritage, and landscape, to bring forward a high-quality and attractive scheme.

The proposals are of an appropriate layout and form which promotes the 15-minute neighbourhood concept, is exemplary in terms of appearance and provides high-quality residential development, designed to be inclusive and accessible, and to contribute to the health and wellbeing of existing and future occupants.

The site will bring forward the creation of a vibrant community by delivering new amenities through the provision of a local centre, and new public open space, incorporating recreational routes, amenity spaces and new children's play areas benefiting existing and future residents.

## **Chapter 5 – Developing a Spatial Strategy**

We support the development of a Policies Map. We recommend the policies map includes site allocations which should be set out within the Regulation 19 Local Plan document. The Council should publish the evidence to support the growth strategy site allocations.

We support the target of delivering around 28,500 homes over the plan period to 2040. The housing target should be achieved within the Borough to meet local development needs.

In paragraph 5.13, the Council provides a windfall allowance of 3,000 homes over the plan period. We consider this to be a challenging target to achieve and evidence needs to be provided to demonstrate that this figure is deliverable. It would also be useful if the term “windfall sites” is defined as part of this work. If the windfall allowance is reduced any shortfall would need to be made up by new site allocations.

We also seek clarification regarding the start date of the plan period.

We support the four broad categories of locations where development could take place. We suggest that a balanced approach to dispersing development across the borough is pursued in the new Local Plan. This is because there are local development needs across the borough so growth should be distributed across the four locations, including Hoo Peninsula.

Urban regeneration is supported and should form an element of the emerging Plan. There are great opportunities for regeneration across the urban areas of Medway which can assist in addressing some of the identified issues currently being experienced, including deprivation, providing homes and affordable homes, and supporting high streets.

However, there is no one-size-fits-all strategy that will work across the Medway towns which each have their own unique characteristics, issues and constraints.

We consider the Consultation Document correctly identifies the key constraints (para 5.24 – 5.28) which need to be considered in further detail through the Evidence Base. This includes a reflection (para 5.26) that urban regeneration sites may not be as viable as greenfield sites, however there should also be a reflection / assessment of the knock-on effect this could have on affordable housing delivery (which is not currently identified).

Further, there should be a reflection that urban regeneration / brownfield sites will often deliver slower than greenfield sites, often due to abnormal costs as well as need for demolition and remediation. Lichfield’s “Start to Finish” (Second Edition, February 2020) found that brownfield sites generally build-out a third slower than greenfield sites. Further, these sites are unlikely to deliver many of the multi-generational homes with an emphasis on flatted development.

We support the preparation of a Sustainability Appraisal, and this needs to be published for the Regulation 19 consultation. Based on our experience, the Sustainability Appraisal needs to provide an accurate and up to date assessment of sites. Discussions with landowners will be important to this process, as well as the assessment of deliverability.

Development of an appropriate scale (e.g. critical mass) can further help deliver a range of local benefits to villages. We recommend that growth is directed to Hoo Peninsula. Bringing forward a critical mass of new homes in this location would help achieve the strategic objectives of the Council and deliver significant benefits.

We support the on-going work on local and strategic highways issues. This is fundamental to the preparation of a sound Local Plan and achieving the Council’s growth aspirations.

The site, at High Halstow, is identified within ‘Map 3 – overview of potential sites for Rural Development’. Paragraph 5.40 identifies that there is significant land for potential development for homes, jobs and services on the Hoo Peninsula. Hoo Peninsula represents a sustainable location for growth. Importantly, the site, at High Halstow (situated on the Hoo Peninsula) can deliver an important number of new homes, including affordable housing and supporting community facilities as part of a high-quality scheme that respects the village and local area and improves the environment.

The planning application for the site demonstrates that proposals at the site, in High Halstow, would contribute towards achieving sustainable development – in relation to social, economic and environmental objectives – and it would deliver a range of significant benefits. The site is deliverable, it is available for development now, it is suitable for development and development is achievable.

## Next Steps

We support the preparation of the new Local Plan for Medway and agree with the overall development strategy. In terms of next steps, we would welcome the opportunity to engage with the Council to help support the production of the Regulation 19 Local Plan.

planning  
transport  
design  
environment  
infrastructure  
land

# **MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE**

**Land west of Lower Featherby Road, Grange.**

CLIENT: HRF Properties Ltd

ID: 1547

OCTOBER 2023  
JAC/OR/32301



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# 1 INTRODUCTION

## 1.1 PURPOSE OF THE STATEMENT

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- 1.1.1 This representation have been prepared on behalf of HRF Properties Ltd 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 For absolute clarity, this representation refers to the ID generated by Opus: **1547**.
- 1.1.3 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?
- 1.1.4 While the site at land to the west of Lower Featherby Road was not submitted as part of the initial call for sites process, it is noted that the site is located adjacently to a number of sites that have all been submitted (RN1, RN2, RN4 and RN5). The site is therefore considered to form part of a logical extension to Gillingham.
- 1.1.5 In answering the above questions, it has been further demonstrated how the land at Lower Featherby Road 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).
- 1.1.6 These representations must be read alongside the on-line form/platform which as been completed.

## 1.2 SUMMARY

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- 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 consistently failed to deliver against its housing requirement since 1986, last meeting its requirement in only two years back in 2008/08 and 2009/10, resulting in a significant housing need, both market and affordable;
- 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 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) requires the inclusion of strategic policies which 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

### 1.3 STRUCTURE OF THE DOCUMENT

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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 promoted (Land to the west of Lower Featherby Road) setting out the reasons why the site should be considered for an allocation;
- **Chapter 6** - Sets out the preferred spatial strategy and why this represents the most suitable and thus "Sound" option.
- **Chapter 7** - Provides additional commentary 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 COMMENTS ON THE PROPOSED VISION

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- 2.1.1 The “Vision” for Medway encompasses broad policy principles for the future emerging Local Plan covering transport, employment, the environment, retail, waste and minerals.
- 2.1.2 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.
- 2.1.3 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. Indeed, the overarching principles for the “Vision” fails to identify housing at all (para 3.1) as forming an important component of the Plan.
- 2.1.4 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).
- 2.1.5 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.*

- 2.1.6 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.
- 2.1.7 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.*

- 2.1.8 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 7<sup>th</sup> paragraph (un-numbered) could be amended as follows:

*The Plan will seek to deliver 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 outline changes are essential to ensure the Plan is “Positively Prepared”, “Consistent with National Policy” and therefore “Sound” (NPPF, para 35)

## 2.2 SUMMARY

---

- 2.2.1 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 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 from sustainable and green future;
  - Supporting people to lead healthy lives and strengthen our communities;
  - Securing jobs and developing skills for a 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, 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 must be expressed as an objective, since many of the other objectives are dependent 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

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- 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, it must be satisfied 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, last meeting its requirement in only two years back in 2008/08 and 2009/10. This has no doubt led 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 significant 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
<b>1986/87 - 2021/22</b>	<b>27,407</b>	<b>35,727</b>	<b>-8,320</b>

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 pa, equivalent to 28,312 homes up to 2040 (circa 28,500 homes). The below section reviews 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. Through 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 the “Urban Regeneration” spatial strategy. There is therefore a high potential for double 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**

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- 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 distinct categories, which form the different spatial strategy options are as follows:
- Urban regeneration;
  - Suburban growth;
  - Rural development; and
  - Green Belt loss.
- 4.2.12 The remainder of this section analyses the capacity of each category for potential housing delivery identified in the LLA.

### **Urban Regeneration Sites**

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- 4.2.13 Map one of the consultation document provides an overview of the potential sites for urban regeneration across Strood, Chatham and Rochester encompassing small medium and large sites. The urban regeneration sites make up the second largest element of the potential supply, with the potential to deliver 11,151 homes.
- 4.2.14 We have significant concerns regarding the reliability of this supply on the following basis:
- The development potential of many of the sites has been known about for some time, but they have failed to come forward, including within more economically buoyant times, because of issues of viability or technical constraints;
  - The Peel Ports site is known to have complex landownership/leasehold constraints. This is without addressing any individual site constraints such as contamination and whether redevelopment of the Site is financially

feasible. There are therefore significant concerns over its delivery which cannot be relied upon;

- Similarly, Medway City Estate (promoted for mixed use development) also have complex landownership considerations and is very unlikely to be fully deliverable within the Plan period;
- The requirement to provide BNG is likely to be a significant constraint to brownfield sites coming forward, especially smaller sites. Whilst on the face of it, many of these sites might seem ecologically sparse, they often harbour more interesting habitats, which under the DEFRA Metric 4 trading rules are very difficult to replace elsewhere. Brownfield sites are also likely to wholly rely on off-site BNG provision. This is either likely to prevent some sites coming forward for reasons of viability (contributions for off-site provision are very high) or significantly reduce the development potential of some sites.

- 4.2.15 With the above concerns in mind, it is considered a conservative estimate that circa **3,500** dwellings of the sites within the urban regeneration category may not be deliverable in the proposed Plan period and based on previous urban regeneration delivery rates.

### *Suburban growth*

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- 4.2.16 Map two of the consultation document provides an overview of potential sites for Suburban Growth, with 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 due to long-standing concerns regarding deliverability due to issues of access and landownership, resulting in lapsed consents.

- 4.2.17 Taking the above into account, it is considered at least **3,123 homes** can be discounted from the potential supply of housing.

### *Rural Development*

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- 4.2.18 The consultation document sets out that through the LAA, that potentially 14,736 homes in the rural development strategy could come forward. The majority of the rural housing sites are on the Hoo Peninsula centred around the settlements of Chattenden, Cliffe, Cliffe Woods, Allhallows, Hoo St Werburgh, High Halstow, Lower Stoke and Grain.
- 4.2.19 There are concerns relating to these sites, including a lack of infrastructure, unsustainable development, and the withdrawal of the HIF fund.

- 4.2.20 It is not fully known how development on the Hoo Peninsula will be impacted by the loss of the HIF funding. However, given the outlying nature of some of the other rural settlements on the peninsula such as Cliffe, Allhallows, Lower Stoke and Grain a conservative estimate suggests a loss of a minimum of 3,327 homes from the potential supply before discounting of sites from the Hoo expansion (previously identified in the Hoo development framework).

### *Green Belt Loss*

- 4.2.21 Just under 5% of land in Medway is designated as Green Belt. The areas of Green Belt form part of the London Metropolitan Green Belt and join land adjacent to Gravesham Borough Council and Tonbridge and Malling Borough Council. The Green Belt in Medway provides the strategic gap between Strood and Higham and between Snodland and Halling. The Council has identified the changing characteristics of the Green Belt due to the context of major infrastructure investment (the lower Thames crossing) as an opportunity for a limited number of homes in proximity to transport networks and services in Strood to be developed in the Green Belt providing new services as well as homes.
- 4.2.22 Where a site for potential Green Belt release conflicts with the five purposes of the Green Belt the site has been discounted from the supply although its contribution is limited.

## 4.3 SUMMARY

- 4.3.1 Overall, having reviewed the 447 sites identified in the LAA Stage 1 assessment, it is considered that from a potential supply of 38,216 homes, optimistically only 27,674 could be deliverable. See table 4.1 below. This is having regard to part delivery rates, known planning and infrastructure constraints, as well as considering whether the broad location and scale of development proposed is suitable given the site's location. Due the high-level nature of LAA a finer grain assessment of the suitability of the Site could not be undertaken. However, our assessment demonstrates that the potential supply as set out at para 5.16 cannot all be relied upon.

Category	Medway Potential Housing Capacity (From LAA)	DHA's view on Potential Housing Capacity (from LAA)	Difference in Supply
Urban Regeneration	11,151	7,651	3,500
Suburban Growth	9,680	6,157	3,123
Rural Development	14,736	11,229	3,147
Green Belt Loss	2,649	2,637	12

<b>Total supply</b>	<b>potential</b>	<b>38,216</b>	<b>27,674</b>	<b>10,182</b>
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TABLE 4.1 SUMMARY OF DHA ASSESSMENT OF MEDWAY'S POTENTIAL HOUSING SUPPLY

- 4.3.2 In addition, the windfall site allowance at para 5.15 and Figure 2, is also optimistically high, and does not accurately reflect likely windfall provision going forward, taking into account the adoption of the Local Plan, allocation of new sites and other constraints to housing numbers such as BNG.

## 5 SITE

### 5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

- 5.1.1 The site is located to the west of Lower Featherby Road, towards the junction with Lower Rainham Road. While the site is currently located outside of confines, it is almost directly adjacent to Gillingham confines, and when taken in consideration with the adjacent sites, the area represents a logical extension to Gillingham and the Medway Urban Area.
- 5.1.2 The large majority of the site is formed of horse paddocks being used for grazing purposes. To the north-east of the site there is an area including a range of buildings, which includes a singular residential dwelling. The majority of the buildings are used for storage purposes. The site proposed is roughly 1 hectare.
- 5.1.3 The area surrounding the site to the west and the south (RN1 and RN2) was submitted at the Call for Sites stage process and have been selected to proceed to Stage 2 of the Land Availability Assessment.
- 5.1.4 RN1 is currently used as Paddocks with a proposed development of up to 100 dwellings, RN2 is currently used as grazing land with a proposed mixed development of up to 650 dwellings and Class E and F2 buildings as well. The figure below shows where the application site is located in regard to sites RN1 and RN2.



FIGURE 1 – MEDWAY LAND AVAILABILITY ASSESSMENT

- 5.1.5 Noting the sites location in relation to Gillingham confines, the surrounding land availability, and existing residential properties, it is expected that this area will form a logical extension to the Medway Urban Area.
- 5.1.6 The site is not located within an Area of Outstanding Natural Beauty (AONB) and is not designated as Green Belt. The site is also not located near to any heritage assets or listed buildings. It has no Tree Preservation Orders (TPOs) and is not designated as natural green space.
- 5.1.7 We note that the site lies within the Gillingham Riverside ALLI. It is considered that the site does not contribute to many of the functions identified of the ALLI.
- Development of the site will have little impact on the green buffer, with the agricultural land to the south remaining. Similarly the site is already related to existing built form.
  - The sites are privately owned and the general public do not have access to the sites.
  - The site does not impact the conservation areas.
  - No orchards will be lost and the proposal would ensure suitable landscaping to maintain, improve or replace existing hedgerows.
  - Given the nature of the site with the built form directly to the north of the site, in addition to various other built form and significant vegetation screening, the site does not contribute to the Riverside Country Park, nor does it form a green backdrop when viewing from the Medway Estuary.
- 5.1.8 Given that the site fails to contribute to the majority of the functions set out as justification for the designations, the harm to the ALLI is concluded to be very limited in this respect. Similarly, impact on landscape character can be mitigated and minimised through development and landscaping on site.
- 5.1.9 In terms of the access on Lower Featherby Road, there is good visibility in both directions with adequate visibility splays. We note that Lower Featherby Road was widened in the last 20 years to two lanes, and therefore is considered suitable to be able to cope with any increase in traffic.

## 5.2 SUSTAINABILITY

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- 5.2.1 The site is located to the west of Lower Featherby Road and to the south of Lower Rainham Road. Travelling westbound along Pier Road provides access to Chatham and Rochester. Travelling southbound also provides access to the M2, and eastbound provides access towards Rainham and Sittingbourne.
- 5.2.2 While the site is located outside of the current settlement confines of Gillingham, the settlement boundary is effectively Yokosuka Way, a very short distance way. There is an existing paved footpath route from the site into Gillingham.



- 5.2.3 The closest bus stops are on Lower Rainham Road and Grange Road, within Gillingham confines. On Grange Road, the bus stop is served by the 176 which has numerous services per hour Monday-Saturday, and hourly services on a Sunday. The 176 travels between Gillingham - Chatham - Walderslade.
- 5.2.4 Gillingham Train Station, accessible via public transport, lies approximately 2km West of the application site and provides services to Rainham (Kent), London Victoria, Dover Priory, Luton via London Blackfriars, Ramsgate, and London St Pancras.
- 5.2.5 There are a number of services and facilities located near the site, including but not limited to: Gillingham Business Park, The Hastings Arms, Woodlands Pharmacy, Medway Maritime Hospital, Twydall Community Centre, Featherby Infant and Nursery School, Featherby Junior School, the Riverside Country Park. All are within walking distance along a well-lit path or can be accessed using public transport.
- 5.2.6 The north western corner of the site is located within flood zone 2/3, albeit this is very partial amount of the site and could adequately be designed out (i.e. utilising the area as garden land).
- 5.2.7 The site has no heritage constraints. The site is located within a single ownership and delivery is not expected to be a problem.
- 5.2.8 At the heart of the NPPF is the presumption in favour of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). These being 'economic, social and environmental objectives'.
- 5.2.9 An economic role includes contributing to building 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. In this respect, the site is suitable, sustainable, available and deliverable for development, and would help contribute to Medway's immediate housing need with the provision of circa. 18no. high-quality new family homes. Moreover, household expenditure generated by future residents will help to support economic activity locally and help to sustain the jobs and services within the local area. The new dwellings will also contribute to the public purse in respect of developer contributions, Council Tax and the New Homes Bonus.
- 5.2.10 A social objective includes supporting strong, vibrant and healthy communities, by providing the supply of market and affordable housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being. The site could provide a high-quality residential development to meet the needs of the local population and will contribute to the social vitality of the Gillingham community. The proposed

development would provide additional homes in an accessible location close to services and facilities to meet this supply and therefore can positively contribute towards the social role identified in the NPPF.

- 5.2.11 From an environmental perspective, it is acknowledged that development of the site would result in development of a greenfield site. However, it is clear that the housing need in Medway cannot be met by a dwindling supply of urban sites and greenfield development is inevitably required. The development of an underutilised greenfield site sustainably located adjacent to the urban area close to services, facilities and public transport connections and at an appropriate and effective density is considered a preferable location in the context of sustainability objectives and simultaneously will make a modest contribution to reducing the need to develop into wider, more ecologically valuable and visually sensitive sites in the countryside.
- 5.2.12 We would highlight that for nearby developments along Lower Rainham Road the environmental impact of development land has been considered acceptable by the Council. From a wider sustainability perspective, the proposal would not involve the loss of land that is of high ecological value.
- 5.2.13 In respect of achieving sustainable development, paragraph 8 of the NPPF confirms there are three strands that contribute to such development; social, economic, and environmental matters and that sustainable development should achieve gains in all three of these areas. These are considered below:

#### Economic

- The development would increase the choice and availability of housing in Medway.
- The increased population would have indirect benefits to local shops and services through additional expenditure.
- The construction of the new development would result in additional employment.
- The development would assist in maintaining existing bus services through increased patronage.

#### Social

- The site could provide a high-quality residential development that would cater for the housing need within the Borough.
- The development would include the provision of affordable housing, so would make a modest contribution towards the Council's social housing needs.
- The site is highly sustainably located, and future residents would be well placed with local services within a walkable distance.

Environmental

- The development will provide the opportunity to improve biodiversity and connectivity throughout the site through the provision of new planting and ecological corridors where possible. The site is currently relatively low in ecological potential, largely in use as grazing land.
- The sustainable location of the site ensures that there is an ability to reduce carbon emissions associated with private vehicle use through sustainable and active travel.
- The site is a highly sustainable location and will enable all future residents to live sustainably. While the site is greenfield, the site is of low ecological value and its impact on the landscape can be suitably screened.
- As noted, there are no heritage constraints associated with the site, nor is the site within the Green Belt or AONB. Similar comments are raised with regards to the ALLI designation, and the site is not considered to be a contributor towards the landscape given its context.

5.2.14 We note that the application site for the proposed development is on the edge of the Gillingham Urban Area. However, it is considered likely that the area is suitable for a managed urban expansion of Gillingham. As mentioned previously, the site also has access to many services and facilities in the surrounding area by walking or taking public transport.

5.2.15 We reiterate that the site is close to multiple bus stops which provide access to wider public transport networks, and many services and facilities are easily accessible via buses or well-lit paths. Because of this, it is considered that the application site is sustainably located, and would make an important contribution to housing in a sustainable location.

## 6 PREFERRED SPATIAL STRATEGY

### 6.1 PREFERRED SPATIAL STRATEGY

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- 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.
- 6.1.2 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.
- 6.1.3 However, having regard to the Site at Section 5, the preferred development option is "Suburban Expansion". In identifying our preferred option, we have also considered the pros and cons of the other development options.

#### Option 1 - Urban Regeneration

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- 6.1.4 This focuses on urban sites within Chatham, Strood and Rochester in and around the individual towns, high streets or on the waterfront of the River Medway.
- 6.1.5 For the reasons section under section 4, significant concerns are raised regarding the deliverability of many of these sites. Whilst in general we do not raise objection to the redevelopment of brownfield sites, these cannot form a significant component of the housing land supply, especially within the first 5 years because of the complexities involved with such sites coming forward.

#### Option 2 - Suburban Expansion

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- 6.1.6 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.
- 6.1.7 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, unlikely to be constrained by issues of viability, such as sites under Option 1.
- 6.1.8 It is evident that the site at Lower Featherby, taken in combination with the adjoining land parcels, represents a suitable extension of Gillingham, in a well located highly sustainable location. Similarly, the land is available immediately for development.

### **Option 3 - Rural Development**

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- 6.1.9 Focuses development to the north of the administrative area on the Hoo Peninsula. For the reasons identified under Section 4. There are significant concerns over the deliverability and reliability of substantial development coming forward under this spatial option.
- 6.1.10 Whilst it might be possible that suitable smaller sites are allocated to meet local housing needs, this spatial strategy cannot be relied upon to deliver the housing numbers purported in Table 1 of the consultation document.

### **Option 4 - Green Belt Release**

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- 6.1.11 These are shown as sites adjacent to the administrative areas of Gravesham Borough Council that are adjacent to the settlement of Strood and in the strategic gap between Halling (Medway Council) and Snodland (Tonbridge and Malling Borough Council) adjacent to where each neighbouring Council are proposing urban extension or standalone new settlements to meet their housing need.
- 6.1.12 The need for green belt release only forms a very small part of the potential supply and should not be relied upon.

## **6.2 SUMMARY**

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- 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.

## **7 OTHER COMMENTS ON THE LAND AVAILABILITY ASSESSMENT**

- 7.1.1 As previously noted, the site to the west Of Lower Featherby Road was not submitted at the initial Call for Sites and therefore does not feature in the Land Availability Assessment.
- 7.1.2 Nonetheless, the site is capable of delivering 5 or more homes and would pass the requirement to progress to Stage 2.
- 7.1.3 In addition, the land availability assessment demonstrates that a number of adjacent sites are also available, and the area forms a logical extension to the urban confines of Gillingham.

## 8 CONCLUSIONS

### 8.1 OVERALL SUMMARY

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- 8.1.1 Having regard to the submitted site, the preferred development option is "Suburban Expansion". In identifying our preferred option, we have also considered the pros and cons of the other development options.



## headley, andrew

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**From:** Vic Godding [REDACTED]  
**Sent:** 19 September 2023 10:13  
**To:** futuremedway  
**Subject:** Yesterday

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Reg 18 email Responses

To allow more development on the Hoo Peninsula will be criminal and here is why:

Just yesterday I needed to contact my GP and collect a prescription from my local Pharmacy, needless to say even contacting the GP was a mission, the reason given when I eventually saw the reception WAS THE EXPEDITIONAL growth in the Hoo peninsula. So NOW the medical services are under huge strain and un-able to provide an adequate service let alone with more increases in population.

Next I moved on to collecting prescription's for myself and my wife ordered 8 days ago, neither were ready for collection the REASON GIVEN Was the fact that the pharmacist deals with 900 yes 900 prescriptions per day, I asked the reason and was informed that the huge growth in Hoo was the reason.....

This is without the problems of living in a large Village with 1 road in and 1 road out, that road being dug up and halved, it is reactive to give the Government more housing without the appropriate infrastructure.

## **Medway Local Plan 2022-2040**

### **Regulation 18 Consultation – Setting the Direction for Medway 2040**

I am a long term resident of Cuxton. My comments on the above consultation relate primarily to areas within the Cuxton, Halling and Riverside Ward and in particular the Green Belt and AONB sites that lie within this Ward.

#### **1. CHR3**

##### **(APP/A2280/W/22/3307648 Land south of Bush Road, near Cuxton, Medway, Kent)**

1.1 In section 1.3 of the introduction to this consultation it highlights the need to consider,

“those aspects of Medway that we want to safeguard for the future”<sup>1</sup>.

1.1.1 I believe this site is one of those aspects that should be safeguarded as it is not only within the Greenbelt but is also an Area of Outstanding Natural Beauty (AONB). The site was also the focus of a recent Planning Inquiry held in March/April 2023.

1.1.2 Cuxton Parish Council and a community action group (Cuxton Against the Winery [CAW] ), participated in the Planning Inquiry as a Rule 6 party in order to support the decision of Medway Planning Committee's to refuse the planning permission for a winery, visitor centre, restaurant and café on the site. At that time, I was chair of Cuxton Parish Council and joined with leaders CAW as a Rule 6 party at the Planning Inquiry.

#### **1.2 *Greenbelt Release***

The Planning Inspector accepted the planning application as an agricultural development and as such could be considered an appropriate development for the Green Belt<sup>2</sup>. However, this exception would not apply to housing under the National Planning Framework, and so the recent Green Belt Assessment prepared by a neighbouring authority that identified this area of Green Belt as ‘particularly vulnerable to development’ could be applied<sup>3</sup>.

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<sup>1</sup> Medway Local Plan 2022-2040, Regulation 18 Consultation – Setting the Direction for Medway 2040, Appendix 1, September 2023

<sup>2</sup> Para 20, page 2, The Planning Inspectorate, Appeal Decision: APP/A2280/W/22/3307648 Land South of Bush Road, near Cuxton, Medway, Kent Stephen Wilkinson 24<sup>th</sup> July 2023

<sup>3</sup> Para 19, page 2 The Planning Inspectorate, Appeal Decision: APP/A2280/W/22/3307648 Land South of Bush Road, near Cuxton, Medway, Stephen Wilkinson 24<sup>th</sup> July 2023

### 1.3 *Area of Outstanding Natural Beauty*

- 1.3.1 The National Planning Framework accords the highest status of protection to AONB and policy BNE32 of Medway Local Plan 2003 requires that any development should conserve the beauty, wildlife and cultural heritage of the area.
- 1.3.2 The Planning Inquiry Inspector identified elements of the landscape and visual effects that are key issues that would prevent the site being considered for development.

### 1.4 *Landscape Character and Appearance*

- 1.4.1 The landscape effects of a housing development within the AONB is likely to create significant landscape harm. It would also require land levelling and require an access road to be created, that in itself, would lead to the urbanisation of this area of the AONB<sup>4</sup> and disruption to the peace and quiet of the Upper Bush Conservation Area.
- 1.4.2 Paragraph 35 of the Planning Inspector's report<sup>5</sup> states that the introduction of a winery into the landscape

‘would have a significant adverse impact on the site and its wider landscape’

It can therefore be supposed that the proposal to use this site for housing or any other type of commercial development would have the same negative impact.

- 1.4.3 The visual effects of an access road to the site have been seen as having a moderate adverse impact on residents living opposite the access road<sup>6</sup>.
- 1.4.4 Any housing or commercial development within Bush Valley itself would be considered a major development in an AONB and it seems inconceivable that this would be seen as an appropriate site for a development.
- 1.4.5 The proximity of the site to the North Downs Way and other long distance paths would expose walkers to a changed landscape that would destroy the scenic beauty of this AONB.
- 1.4.6 The Planning Inquiry Inspector highlighted the major-moderate adverse visual impact the planned vineyard would have when viewed from

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<sup>4</sup> Para 30, page 4 The Planning Inspectorate, Appeal Decision: APP/A2280/W/22/3307648 Land South of Bush Road, near Cuxton, Medway, Stephen Wilkinson 24<sup>th</sup> July 2023

<sup>5</sup> Para 35, page 5 The Planning Inspectorate, Appeal Decision: APP/A2280/W/22/3307648 Land South of Bush Road, near Cuxton, Medway, Stephen Wilkinson 24<sup>th</sup> July 2023

<sup>6</sup> Para 40, page 6 The Planning Inspectorate, Appeal Decision: APP/A2280/W/22/3307648 Land South of Bush Road, near Cuxton, Medway, Stephen Wilkinson 24<sup>th</sup> July 2023

Ranscombe Farm Plantlife Reserve<sup>7</sup>. This would seem to confirm the unsuitability of the site for housing or commercial development.

### 1.5 *Peace and Quiet*

- 1.5.1 The site is an area of seclusion and intimacy that became even more valued by the community during the Covid pandemic as a tranquil place to walk during a period of forced isolation. The introduction of housing with its associated noise and light pollution would cause harm to the tranquillity associated with an AONB.
- 1.5.2 In conclusion, any major development in an AONB should be refused other than in exceptional circumstances that are in the public interest<sup>8</sup>. There is a need for more housing in Medway, but this should not be at the cost of harm to landscape and visual assets through urbanisation.

### 1.6 *Bush Road and the Bush Road/A228 Junction*

- 1.6.1 Bush Road is designated as unsuitable for HGV traffic so the building for commercial use on this site should be limited if it generates high numbers of HGVs.
- 1.6.2 Medway Council must be fully aware of the traffic issues at the junction of Bush Road and the A228 at Cuxton. Queues form at this junction at morning and afternoon peak times. The request for full traffic lights has been refused because of safety concerns expressed by National Highways. They suggest that permanent traffic lights will cause dangerous queues to form on the slip roads at junction 2 of the M2.
- 1.6.3 Currently, peak time traffic is controlled by the use of the north side pedestrian traffic lights briefly stopping north bound traffic, allowing egress from Bush Road on to the A228 at peak times.
- 1.6.4 Additional housing at the CHR3 site is likely to increase the peak time traffic queues at the Bush Road/A228 junction as new residents make their way to and from work. It is not unreasonable to suggest that if this scenario comes to pass, the use of the pedestrian crossing lights to mitigate the problem of egress from and access to Bush Road will be inadequate.
- 1.6.6 The section of Bush Road from the Mayflower Heights to the end of the village envelope is narrow and has no pavement, so any pedestrians walking beyond this point to the village shops and school have to do so on the main narrow carriageway. This raises additional safety issues,

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<sup>7</sup> Para 53, page 8 The Planning Inspectorate, Appeal Decision: APP/A2280/W/22/3307648 Land South of Bush Road, near Cuxton, Medway, Stephen Wilkinson 24<sup>th</sup> July 2023

<sup>8</sup> Paras 176-177 National Planning Framework

especially as this area of road is narrow and regularly subject to flooding.

## **2. CHR4**

### **Land forming part of the Medway/Holborough Cement Works estate, Holborough Road, Snodland, Kent**

#### *2.1 Green Belt Release*

- 2.1.1 This area of Green Belt land appears to be part of a huge development that sits across the border between Medway and Tonbridge and Malling. Inclusion of this Medway section of the Green Belt which would need to demonstrate it meets the criteria for exception<sup>9</sup>.
- 2.1.1 The location of potentially 1,100 houses in this section of the development is likely to have an adverse impact on the North Downs Way and local ancient woodland in terms of landscape, noise and light pollution.

#### *2.2 Access to A228*

- 2.2.1 This development would need access to the A228 at a point where the north bound dual carriageway ends and remains a single carriageway along the Halling bypass, through Cuxton to the roundabout at the top of Sundridge Hill. From the roundabout a dual carriageway provides access to junction 2 of the M2.
- 2.2.2 Given the existing problems of traffic flow at peak times through Halling, Cuxton to the M2, it would be reasonable to suggest that any housing development must be much smaller than the maximum of 1100 houses proposed.

## **3 CHR7**

- 3.1 Building on this site would result in a blurring of the boundary between Cuxton and Halling.

## **4 CHR13**

### **Substation site**

- 4.1 The adjacent Homestead site was refused planning permission for development. I assume that given the close proximity the same objections would apply to adjacent land numbered CHR13.

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<sup>9</sup> Paras 176-177 National Planning Framework

- 4.1.1 The adjacent land was assessed by Medway Strategic Land Availability Assessment 2019 as “*Unsuitable due to landscape impact, including setting of AONB*” (Appendix 3: SLAA 1068).
- 4.1.2 The adjacent land lies within an Area of Local Landscape Importance (ALLI) known as *Cuxton Scarp Foot*. It is listed in Medway Council’s Local Character Assessment Report 2011 p98 *making it unsuitable for any type of development*. ALLI status also provides clear links with the current Medway Green Blue Infrastructure Vision 2019.
- 4.1.3 The adjacent land lies within the Strategic Gap identified in the Medway Local Plan 2003 “3.4.97 *The policy is intended to apply both to the expansion of existing settlements and free standing developments which would erode the open character of the countryside and undermine its function of maintaining the separation of the existing settlements*”.

## **5 CHR14**

### **Port Medway Marina**

- 5.1 This site is primarily an area that has been subject to extensive infilling and has been refused/withdrawn planning permission for housing in the past.
- 5.2 The site is the river side of the Medway Valley railway line travelling through Cuxton.
- 5.3 Site access and egress to and from the site is via the level crossing on to Station Road. As a consequence, access for emergency vehicles access to the marina could be restricted/delayed by the level crossing.
- 5.4 There is an environmentally sensitive pool on this site.
- 5.5 Station Road is single carriageway with cars parked along the north side of the road. When the level crossing is closed to allow for essential track maintenance, residents of the boats on the 2 marinas have to be move their vehicles to Station Road so they can use them while the level crossing is closed.
- 5.6 When these situations arise currently, all the parking spaces on Station Road are in use.

A summary of most of these comments have been placed on the consultation website.

I appreciate the urgency with which completing Medway’s Local Plan has been given by the incoming council and appreciate the huge challenge you face with meeting this aim.

Yours sincerely

Kay

30 October 2023  
L231030 SAV Reg 18 Consultation Reps FINAL



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**SUBMITTED VIA EMAIL:** [futuremedway@medway.gov.uk](mailto:futuremedway@medway.gov.uk)

Dear Sir or Madam

**MEDWAY LOCAL PLAN REVIEW: REGULATION 18 CONSULTATION – SETTING THE DIRECTION FOR MEDWAY 2040  
REPRESENTATIONS SUBMITTED ON BEHALF OF BLUEBERRY HOMES**

**Introduction**

We write on behalf of our client, Blueberry Homes, to submit formal representations to the Medway Local Plan Regulation 18 Consultation – Setting the Direction for Medway 2040 (the '**Consultation**').

Blueberry Homes is the owner of the site located at Pier Road which is located to the north of Gillingham and accessed via Strand Approach Road, identified in the Council's Land Availability Assessment 2023 as Site Ref: GN6 ('**The Site**'), details of which are provided below.

Blueberry Homes wants to make long term, capital investment within the Borough to assist in bringing forward the transformation of this waterfront site for high quality mixed-use development which in turn will help meet the strategic policy objectives of the Council.

This representation seeks to demonstrate our client's overall support of the Vision for Medway in 2040 and how the Site will assist in meeting the identified need for housing, and other uses, within the Borough.

Our client welcomes the opportunity to work in partnership with the Local Planning Authority ('**LPA**') and can provide additional information and evidence as may be required as the Local Plan progresses in order to assist with this process. We would therefore welcome the opportunity to meet with Officers in the near future in order to discuss the enclosed comments in more detail.

**The Site**

The Site is located to the south-east of Gillingham Marina, north of Pier Road and to the west of the Strand Pool and Leisure Park and Strand Approach Road. The Site includes SGN gas company buildings and structures including two gasholders and ancillary infrastructure, and Segas Sailing Club.

The remaining land within the ownership is primarily areas of hardstanding and some areas of vegetation to the southern boundary.

A plan showing the extent of Blueberry Homes current ownership (blue outline) is enclosed with these representations (Drawing Ref: 17286-011).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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Our client's aspirations for the Site are evolving but as this stage based on initial concept work, our client considers that the Site has the potential to accommodate the following:

- Approximately 500+ homes, subject to further detailed assessment;
- Potential for an assisted living / care home and / or purpose built student accommodation ('PBSA');
- Commercial uses including a foodstore and a range of flexible commercial units; and
- Potential for the reprovion of a clubhouse for the Sailing Club.

We comment on the potential of the Site in more detail below, as part of these representations.

## Representations

We provide our representations to specific parts of the Consultation below. These comments have been prepared to assist the LPA's preparation of its draft Local Plan, including its evidence base and policy wording, to ensure that when prepared the Plan can ultimately be found 'sound', and fully recognise the early stage of the Plan's preparation.

The Consultation identifies that at this stage, there are no specific policies or site allocations which are preferred by the Council for new development. These representations seek to respond to the information contained within the Consultation and this response provides commentary on the vision, strategic objectives and developing a spatial strategy, with specific regard to urban regeneration.

Our representations below are made under the specific headings / paragraph numbers contained within the Consultation for ease.

### *Vision for Medway in 2040*

The Consultation states:

*"The plan's vision is to establish Medway as a leading regional city, connected to its surrounding coast and countryside; with a thriving economy, where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets."*

A fundamental part of the overall Vision for Medway should be a positive and proactive approach to support new development.

It is acknowledged that the Vision for Medway has been established through the recognition that there are marked differences in health and wellbeing across communities in Medway. The Vision places people at the centre of the Plan, and places importance on Medway being a healthy place to live, including high quality, well designed housing. Essential to this is providing for the diverse communities by taking into account the needs of different sectors of the community.

Our client supports the Vision and wishes to reiterate the important contribution that the future development of the Site can make toward achieving this.

In relation to housing delivery, our client supports the vision for 'providing for healthier and more sustainable choices of homes'. However, we believe the Vision should go further, and proactively encourage and support the delivery of housing based on meeting the existing and projected needs as a minimum. We also believe that the Vision should be clear in the priority being for housing to be located within the existing urban areas, with specific concentration on making effective use of land. The Vision should be clear in the importance of giving substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, in accordance with the aims of the NPPF<sup>1</sup>.

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<sup>1</sup> NPPF paragraph 120

The Vision identifies the importance of the urban waterfront and states that there should be continuous paths with attractive and healthy connections, and the development of the Site can assist in achieving this aim.

The Site intends to provide a mixed-use scheme which will allow for daily needs to be met within the development, in line with the aims of the Vision.

The overall Vision will also need to be reflected in both the strategic and detailed development management policies of the future Local Plan, as it progresses.

### *Strategic Objectives*

#### Paragraph 4.2 (Proposed Objectives)

Our client supports the objective to provide for the housing needs of Medway's communities. Although it is acknowledged that the level of detail established at this stage in the Local Plan preparation is limited and will be progressed in further detail as the Plan progresses. The sizes, types and tenures of the proposed housing at the Site will be informed by the housing need demonstrated within the Local Plan.

Our client supports the objective to secure a range of accessible services for local communities close to where they live. This objective provides for sustainable communities with sufficient access to services, in accordance with the NPPF<sup>2</sup>.

In relation to the regeneration of Medway, the plan process should include review of the key areas of regeneration and specifically consider how the wider transformation of the waterfront will be supported throughout the plan period. There should be flexibility within the policy approach to allow for mixed-use developments to ensure that there are sustainable communities within the areas of regeneration.

Whilst our client generally supports the overall Strategic Objectives it will be important to ensure that detailed policies under the subsequent chapters are formulated appropriately, in order to support their delivery.

### *Developing a Spatial Strategy*

#### Paragraph 5.4

We acknowledge that there is current uncertainty regarding the Standard Method formula and we acknowledge that the Council has submitted these concerns about the standard method to Government. However, we request that as the Local Plan progresses that the LPA consider the outcome of this response once published and consult with the public and stakeholders such as our client, to ensure that the appropriate approach is undertaken in terms of determining the scale of housing needed over the plan period.

It will however be important that housing provision is set as a minimum target in the future Local Plan.

#### Paragraph 5.16

Our client supports the general approach to growth, albeit considers that there is potential for additional growth in Urban Regeneration areas, including the potential for the Site to make a greater contribution towards housing provision than set out in the Land Availability Assessment 2023.

### Urban Regeneration

#### Paragraph 5.18 – 5.21

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<sup>2</sup> NPPF paragraph 73

Our client specifically supports the inclusion of the Site within the overview of potential sites for 'Urban Regeneration' and request that this be taken forward as an allocation in the future Local Plan.

Our client supports the Council's starting point of regeneration and making the best use of vacant or underutilised brownfield land in accordance with the NPPF. The proposed development of the Site would fully meet this objective.

The Land Availability Assessment ('LAA') Interim Report was published in September 2023. The Site was identified within the LAA as Site ID GN6: 'Gillingham No. 3 and 4'. The LAA provides details of the existing site and proposed development. It recognises that the Site is categorised as 'Brownfield – previously developed land'.

Since the previous Call for Sites exercise, our client has progressed the initial concept proposals to establish an approximate mix of uses on Site. Following further review of the development potential, in terms of uses and capacity of the site, our client considers that the Site has the potential to deliver the following:

- Approximately 500+ homes, subject to further detailed assessment;
- Potential for an assisted living / care home and / or purpose built student accommodation ('PBSA');
- Commercial uses including a foodstore and a range of flexible commercial units; and
- Potential for the reprovision of a clubhouse for the Sailing Club.

Our client believes that the Site has the potential to achieve a greater number of homes than detailed within the LAA (2023), but fully recognises this subject to further work including discussions with Officers in relation to matters including technical, design, environmental and amenity considerations.

The design concept includes the potential for a proportion of the proposed homes to be dedicated to assisted living / care home purposes or PBSA. Our client would welcome discussions with the Council as further work on the potential development of the Site, including the proposed uses and number of homes, evolves.

Our client continues to support the inclusion of the Site within the LAA and further consultation documents and requests that the Site be formally allocated for future development for the range of uses as set out above, within the future Local Plan.

#### Paragraph 5.22

It is currently unclear what the boundaries of the 'central urban areas' are. As the Local Plan progresses, we request that these areas are identified and consulted on. However, we support the recognition that the underused and vacant sites have the potential for higher density development and our client fully intends to continue work collaboratively with the Council to establish an appropriate density for the Site.

#### Paragraph 5.24

Our client supports the principle of locating development in sustainable locations which are well-served or could be well-served by public transport. The Site is well-served by existing bus stops directly adjacent which provide good transport links for potential future residents.

#### Paragraph 5.25

We recognise that the waterfront is an important area for nature and the potential impacts of development should be considered from the outset of the design process. Our client requests that policies relating to ensuring the future proofing of buildings are flexible in their approach to ensure that appropriate design solutions can be formed in relation to site constraints such as environmental matters, including flood risk.

#### Paragraph 5.26

Our client supports the recognition that brownfield sites have potentially high redevelopment costs, therefore affecting viability. This is particularly the case given the nature of the Site including the potential for remediation. Our client would like to continue discussions surrounding the potential constraints of the Site with the LPA in order to ensure that the redevelopment of the Site can be appropriately delivered.

#### Paragraph 5.27

Our client supports the aim to deliver sustainable development, which can be achieved on the Site by providing a mixed-use development including potential for a foodstore albeit with flexibility on uses to ensure that homes are supported by appropriate services and facilities, subject to commercial viability.

### **Summary and Conclusion**

We trust that this correspondence will be fully considered by the Council as part the preparation of the new Local Plan.

As set out above, Blueberry Homes wish work positively and proactively with the LPA in regards to developing an appropriate scheme for the Site which is in line with the vision and strategic aims of the emerging Local Plan, and considers it should be allocated within the future Local Plan. We are happy to arrange a meeting to discuss the future aspirations for the Site and facilitate the sharing of information and evidence to best inform the Local Plan process.

We would be grateful if you can keep us updated on progress of the Local Plan review and any future stages of consultation.

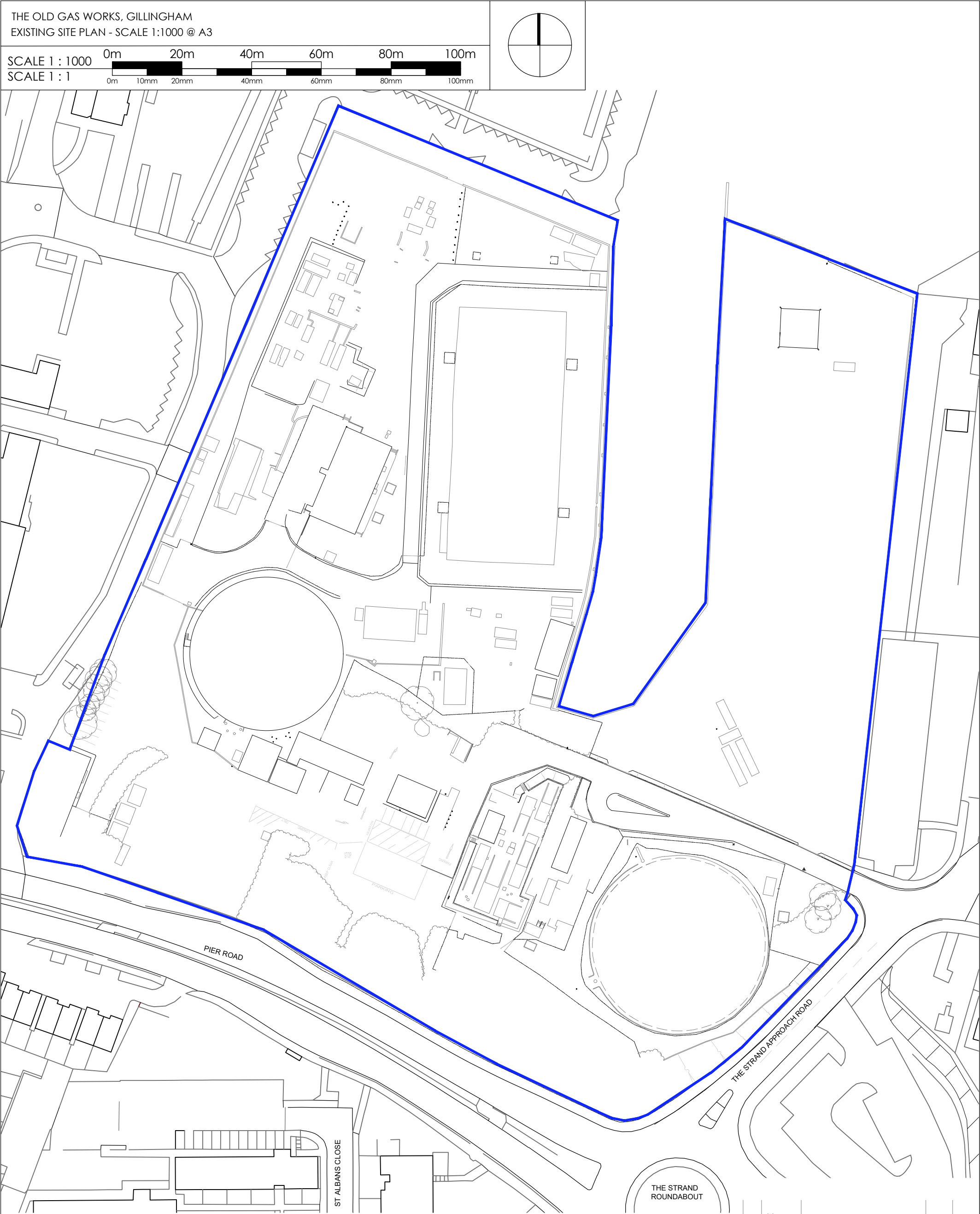
In the meantime, if you have any questions please contact Amelia Robson or Alistair Ingram at these offices.

Yours faithfully



**Savills (UK) Ltd**  
Planning

Enc: Existing Site Plan (Drawing ref: 17286-011)



KEY

Land within Client's Ownership

CAD file reference G:\17000-18000\17286 - The Old Gas Works Gillingham ME7 1TT\17.0 Drawings\900 Serise-Legal

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Project Title	THE OLD GAS WORKS, GILLINGHAM PIER ROAD GILLINGHAM KENT ME7 1TT			
Client	BLUEBERRY HOMES			
Status	FEASIBILITY			
Scale	1:1000	Drawing Size		A3
Date	05/06/2023	Drawn By	CW	Checked IP

Rev	dd-mm-yy	-----	Rev By	Chk'd By
Drawing Title		EXISTING SITE PLAN		
Job-Dwg No		17286-011	Rev	-
<div><input type="checkbox"/> 2 St. Johns North, Wakefield, WF1 3QA t. 01924 291800</div> <div><input type="checkbox"/> Carvers Warehouse, 77 Dale Street, Manchester, M1 2HG t. 0161 2388555</div> <div><input type="checkbox"/> The Old Rectory, 79 High Street, Newport Pagnell, MK16 8AB t. 01908 211577</div> <div><input type="checkbox"/> 101 London Road, Reading, RG1 5BY t. 0118 9507700</div> <div><input checked="" type="checkbox"/> 10 Gees Court, St Christophers Place, London, W1U 1JJ t. 0207 4091215</div>				
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## **Future Medway Local Plan 2040**

### **Response to the Regulation 18 Consultation – Setting the Direction for Medway 2040**

**Site known as ‘The Depot’, Ratcliffe Highway, Hoo St Werburgh, Rochester, Medway ME3 8QB**

**On behalf of Kitesfield Estates Limited.**

#### **Prepared by:**

Ben Young BSc (Hons) MA MRTPI

**Date:** 30 October 2023

**Job Ref:** 01.002.3184

ISSUE DATE / REVISION	COPY REVIEWED BY	DATE COPY HAS BEEN REVIEWED
27 October 2023	BY	27 October 2023

# 1. Introduction

- 1.1. We are writing on behalf of our client, Kitesfield Estates Limited, in respect of the Medway Council's Local Plan – Regulation 18 Consultation Report-Setting the Direction for Medway 2040.
- 1.2. This representation promotes a 1.05ha brownfield site on the southern side of Ratcliffe Highway, Hoo St Werburgh, Rochester, ME3 8QB, known as 'The Depot' Ratcliffe Highway and herein known as 'the site' for inclusion in the future Local Plan.
- 1.3. The site is owned by Kitesfield Estates Limited and is leased to L & P Recovery Limited. This site is considered to be an **omission** from the draft Regulation 18 consultation strategy, which identifies broad areas for development in the context of the forthcoming Medway Local Plan.
- 1.4. The site provides an opportunity to provide a development site in the Hoo Peninsula rural development area. This **omission** site could contribute to the Council's substantial housing requirements within the district, especially when joined with the neighbouring sites, already identified.
- 1.5. This brownfield site, currently trading as a vehicle sales and repair business, has never been promoted through the Local Plan process, at either the call-for-site or former regulation 18 stages. It is now being promoted through Bloomfields Chartered Town Planners, following the adjoining and neighbouring sites coming forward for large-scale housing schemes. It is considered that the site provides an opportunity for additional housing development, and hence, positive growth in the Medway area to 2040.
- 1.6. This representation responds to the current Regulation 18, by setting out how the site meets the aspirations and broad spatial strategy being promoted in the Local Plan, specifically in the rural area. In addition to responding to each of the headings in the consultation document, and identifying how the site can deliver the vision and objectives through sustainable development.



## 2. Context

- 2.1. The production of the Medway Local Plan has involved several key stages. Three stages already having been completed, the 'issues and options' (Regulation 18) completed in 2016, the 'development options' (Regulation 18) completed in 2017, and the 'development strategy' (Regulation 18) completed in 2018. This consultation, 'setting the direction for Medway 2040' (Regulation 18) consultation, marks the fourth consultation phase and the final Regulation 18 consultation before the publishing of the Regulation 19 draft plan.
- 2.2. The current consultation period considers why the Council needs to plan for Medway's growth. It refers to aspects of Medway that need to be safeguarded for the future, such as beautiful landscapes and historic buildings. The consultation document also outlines potential options for building new homes, workplaces and services, such as schools and surgeries.
- 2.3. It is understood that this consultation does not detail policies or identify those sites preferred by the Council for new development, but does relay key areas where development could come forward.
- 2.4. This representation seeks to promote a 1.05ha brownfield site on the southern side of Ratcliffe Highway, Hoo St Werburgh, Rochester, ME3 8QB. Please see the attached site plan for the full boundary of the site.
- 2.5. This site has not previously been promoted for development through the 2008 Call for Sites or more recently the 2023 Call for Sites exercise undertaken by Medway Council, the Local Planning Authority (LPA). On this basis, the recently published interim Land Availability Assessment for Medway (September 2023) does not include an assessment of the site.
- 2.6. For the completeness of this Regulation 18 consultation, the site is considered an **omission** and it should be included in the defined area being promoted as part of the wider rural development area in the Hoo Peninsula.

- 2.7. This representation confirms that the site is being promoted primarily for a housing-led development scheme. The strategic location and size of the site provides the opportunity for the delivery of a major residential-led scheme, which could be developed in isolation or more strategically with the neighbouring site, Land At Ratcliffe Highway Hoo (associated with planning application MC/23/1934).
- 2.8. The area of land which surrounds the site on its western and southern boundary is currently subject to assessment as part of planning application MC/23/1934. This application for outline consent is currently under consideration and sets out a scheme for the erection of up to 240 residential dwellings, being promoted by Gladman, including 25% affordable housing, together with a new vehicular access point from Ratcliffe Highway, open space, landscaping and associated works.
- 2.9. As the site has not been promoted for development through any previous call for sites or Local Plan stage consultations, it is not included in the general rural development land approach advocated in the rural development sites model shown in Map 3 'Overview of potential sites for Rural Development'. In consideration of the consultation, it is therefore submitted that its non-inclusion is an **omission**.

### 3. Site Description and History

- 3.1. The 1.05ha brownfield site on the southern side of Ratcliffe Highway, is a roughly triangular-shaped site accessed from its own permanent access off of Ratcliffe Highway. The site comprises hard standing and several buildings which serve the current business uses. A further review of the Google Earth historic maps, identifies that the site has a history of commercial motor vehicle use as far back as the 1960s.
- 3.2. The site is located adjoining the Ratcliffe Highway to the north and on this boundary it is screened by a thick band of hedging and vegetation.
- 3.3. It is surrounded by agricultural fields to the south and west and there is a further narrow hedgerow which screens the site on these boundaries. These agricultural fields are subject to a planning application for outline consent (MC/23/1934) for 240 dwellings which is currently under consideration.

- 3.4. The eastern boundary extends to the access drive with the properties known as River View and the Mill View Cottages located on the opposing side. The site access is located between the Mill View Cottages and the eastern boundary of the site, with the shared access extending southwards to the neighbouring property River View.
- 3.5. The site had a planning application approved with conditions under reference (22/1498) for retrospective provision of additional hard standing and enclosure between the depot and the highway for light industrial use including car sales. This extended the area of the site northwards towards Ratcliffe Highway, increasing the brownfield area of the site significantly.

Constraints:

- 3.6. Current National Policy in the NPPF *“the use of previously developed land, and sites that are physically well related to existing settlements, should be encouraged where suitable options exist.”*
- 3.7. In accordance with the Local Plan Policies Map 2023 the site does not have any constraints to development. It is a brownfield site that is currently predominantly utilised for vehicle salvage/repairs and sales. The site is outside of the urban settlement boundary to which Policy BNE25 of the Local Plan applies, but it is located within a wider area identified for potential housing development in the rural development area in the current Regulation 18 consultation. The site directly relates to the adjoining housing development scheme currently being promoted for 240 residential units by Gladman under planning reference MC/23/1934.
- 3.8. Furthermore, the recent 2022 planning application approved on the site confirmed that the *“site is not designated as a strategic gap under Policy BNE31 of the Local Plan and Magic Maps indicate the site is “other” land and not agricultural land. It is noted the surrounding area is classified as Grade 3b agricultural land. Grade 3b agricultural land is low grade with the most versatile agricultural land (as noted in the NPPF) being grades 1-3a”*.
- 3.9. In respect of the local landscape, it is our view that there will be no unacceptable impact on the landscape value as the site is an in use brownfield site. The Council’s Medway Landscape Character Assessment (2011) (‘MLCA’) identifies that the site falls within the Hoo Peninsula Landscape Character Area, more specifically the Deangate Ridge area.

- 3.10. In accordance with paragraph 125 of the NPPF 125, *‘area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places’*.
- 3.11. As an alternative to a stand-alone development, the development of the site could be considered with a comprehensive and sensitive masterplan approach with adjoining sites. Either way, both approaches could incorporate masterplanning, appropriate landscaping and suitable design codes to ensure that a suitable and necessary development could be delivered on this part of the Hoo Peninsula.

## 4. Deliverability

- 4.1. Paragraph 68 of the National Planning Policy Framework (‘NPPF’) requires for plan-making, local planning authorities (‘LPAs’) should identify and update a supply of specific deliverable sites sufficient to provide 5 years-worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of. Furthermore, specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan need to be clearly set-out.
- 4.2. The Glossary of the NPPF defines deliverable and developable as following:
- 4.3. *“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
- 4.4. *a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- 4.5. *b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.*

- 4.6. *“Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.*

#### Availability

- 4.7. Kitesfield Estates Limited, who own the site, have confirmed that the site is currently tenanted and subject to a lease which expires at the end of 2026. On this basis, and subject to its inclusion in the Local Plan, the site could become available in the first 5 years of the Local Plan period.

#### 4.8. Suitability for Residential Development

- 4.9. The site is located on the main Ratcliffe Highway route, which directly accesses the Peninsula Way between the settlements of Hoo and Chattenden. It is served by good public transport services and a wide range of services/facilities. There are no constraints that could not be overcome to facilitate residential development.
- 4.10. The sites would be suitable for housing development, as a highly sustainable and logical extension to the settlement of Hoo. If the site were to come forward for residential development, it could also sit comfortably with the adjoining proposed major residential development scheme or be brought forward alongside it as a strategic and master-planned development scheme for the western Hoo area.
- 4.11. The site would form a positive approach to housing delivery in Medway on a brownfield site. At an average 30 dwelling per hectares, often advocated in rural areas, the site could have an indicative capacity of around 30 units.

#### Achievability

- 4.12. Subject to the grant of necessary planning permission, the site is realistically capable of delivering housing development in the early phases of the Plan period. Development viability will be assessed by taking into account the affordable housing requirements, other obligations and market conditions at the time when development proposals are promoted through the planning application process. At this stage, there is no indication to suggest that there will be any viability issues for housing development on this site.

## 5. The vision for Medway in 2040

- 5.1. The NPPF (paragraph 20), sets out that strategic policies should *‘set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for [amongst others]:*
  - a) *housing (including affordable housing), employment, retail, leisure and other commercial development’;*
- 5.2. Furthermore, the National Planning Policy Framework (‘NPPF’) requires that in order to boost housing supply, local planning authorities (‘LPAs’) should identify a supply of specific deliverable sites sufficient to provide 5-years’ worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of housing.
- 5.3. The consultation report highlights in paragraph 5.4 that *“It has to be recognised that there is a housing crisis, particularly regarding affordability and there is an absolute need to provide the right homes in the right places to meet Medway’s growing needs and the requirements for those desperately needing a good quality home”*. It goes on to acknowledge that many existing residents are living in over-crowded and / or sub-standard housing conditions.
- 5.4. It is important that the protection of the intrinsic character and qualities of a site or an area are considered, but these qualities can be protected when new housing development is delivered, through good design and by improving the sustainable networks and access to places and services. Rather than seen as negative, new housing development should be seen as an opportunity to improve the area for the current and future residents delivering the types and quantity of homes that are desperately needed. On this basis, respectfully, reference to ‘housing delivery’ should be made in the vision.
- 5.5. It is submitted that the development of the site, either delivered in solo or in conjunction with the adjoining proposed development sites could form a primarily housing-led scheme which could be an option to deliver not only the existing elements of the vision for Medway, but could also deliver important housing numbers in the Medway area early-on the plan period. The site is both available and the development of the site is achievable.

## 6. Strategic Objectives

- 6.1. Paragraph 119 of the NPPF sets out that *'planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'*.
- 6.2. It is set out in the current consultation that *"The role of the Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment"*.
- 6.3. In order to deliver the Local Plan, it is proposed that the plan is set around strategic objectives. *"The objectives will feed into the wording of policies and how sites and different locations are assessed for potential development. The objectives are presented around broad themes for the environment, communities, economy, and investment in infrastructure and design that is fit for the future"*. This representation **supports** the use of objectives to deliver the strategic aims of the plan, but wishes to raise the following comments regarding the individual objectives:

### Objective: Prepared for a sustainable and green future

- 6.4. The objective to support action against climate change and a sustainable future for Medway is **supported**. This actively meets the aspirations of paragraph 153 of the NPPF which sets out that *'Plans should take a proactive approach to mitigating and adapting to climate change'*.
- 6.5. This representation promotes the delivery of sites in the rural area to help deliver 14,736 homes as a way, amongst others, that could deliver a sustainable and green future for Medway.



- 6.6. Paragraph 5.41 of the Regulations 18 consultation, sets out that *“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”*.
- 6.7. This statement is supported and the site, subject to promotion through this representation, provides an opportunity to deliver this strategy on a brownfield site.

Objective: Supporting people to lead healthy lives and strengthening our communities

- 6.8. Section 8 of the NPPF provides guidance on ‘Promoting Healthy and Safe Communities’. The proposed objective in the Medway Local Plan actively meets this objective and is therefore **supported**. But, respectfully it is considered that there is an **omission** in how the objective is drafted.
- 6.9. The intentions of the third bullet point, proposes to strengthen the role of Medway's urban, neighbourhood and village centres...” This position is supported, but it is considered that ‘rural extensions’ should also be included in this objective, especially, as the rural development sites are included within the proposed spatial strategy for delivering growth.

Objective: Boost pride in Medway through quality and resilient development

- 6.10. This representation **supports** the provision of quality and resilient development in Medway and we support the Council's recognition that growth does not mean losing character of an area.

- 6.11. The second bullet point sets out that sustainable development should be directed to the *“most suitable locations that can enhance Medway’s economic, social and environmental characteristics”*. This stance is supported, as it acknowledges that development of both brownfield and greenfield sites can come forward to meet the housing requirement. The most suitable locations that can enhance Medway’s economic, social and environmental characteristics should be utilised to deliver the housing requirement of the area.
- 6.12. An allocation for development of the site could provide an opportunity to deliver this objective, in a development which meets the aspirations of sustainable development, directing development to the most suitable locations, in this case a brownfield site.

## **7. Strategic objectives**

- 7.1. The level of housing need required for the Medway area identifies a requirement for 1,667 homes a year in Medway, which provides a total figure of around 28,500 homes to be delivered before the end of 2040. This figure could further be increased, as it is identified in paragraph 5.11 of the consultation that Medway Council are currently considering a request from Gravesham Borough Council to increase capacity by 2000 homes to help meet the housing need of their district.
- 7.2. In March 2023 Gravesham Borough Council produced its Five Year Housing Land Supply Statement, covering the period 2022-2027. This document sets out that Gravesham only has 2.9 years of deliverable housing supply. In accordance with the Gravesham Local Development Scheme (January 2023) the new Local Plan for Gravesham is not expected until December 2024, and thus, the Borough’s Housing Land Supply (HLS) is not likely to improve in the near future. The high likelihood of Medway having to absorb some of this housing need should not be ignored in the early stages of Local Plan creation for Medway.

- 7.3. It is understood that Medway Council are still establishing final housing need numbers, due to the Council raising concerns with the Government derived figures, and the basis and calculations on which final numbers are determined. However, it is made clear in paragraph 5.13 of the consultation that the Council will look to find potential site allocations enough to provide for 19,000 dwelling units, the additional 7500 sites being provided through extant supply.
- 7.4. We wish to raise an **objection** to this approach advocated by paragraph 5.13 because the acknowledged uncertainty in the number of housing numbers required to be delivered, means that a more proactive approach, by allocating more sites, should be taken.
- 7.5. The Council should be looking at allocating more sites, to meet a potential increased capacity, in the Local Plan to ensure that there is an appropriate buffer should there be an additional requirement for housing in the Medway area, rather than relying heavily on delivering the target number of 28,500 homes.
- 7.6. In accordance with paragraph 69 of the NPPF, it is identified that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. It sets out that ‘to promote the development of a good mix of sites local planning authorities should:
- “a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare”;*
- 7.7. The site, subject to promotion through this representation, could provide a reasonable alternative and an additional site on the outskirts of Hoo for additional housing development. On this basis, the site should be included for assessment in the Council’s Land Availability Assessment (LAA).

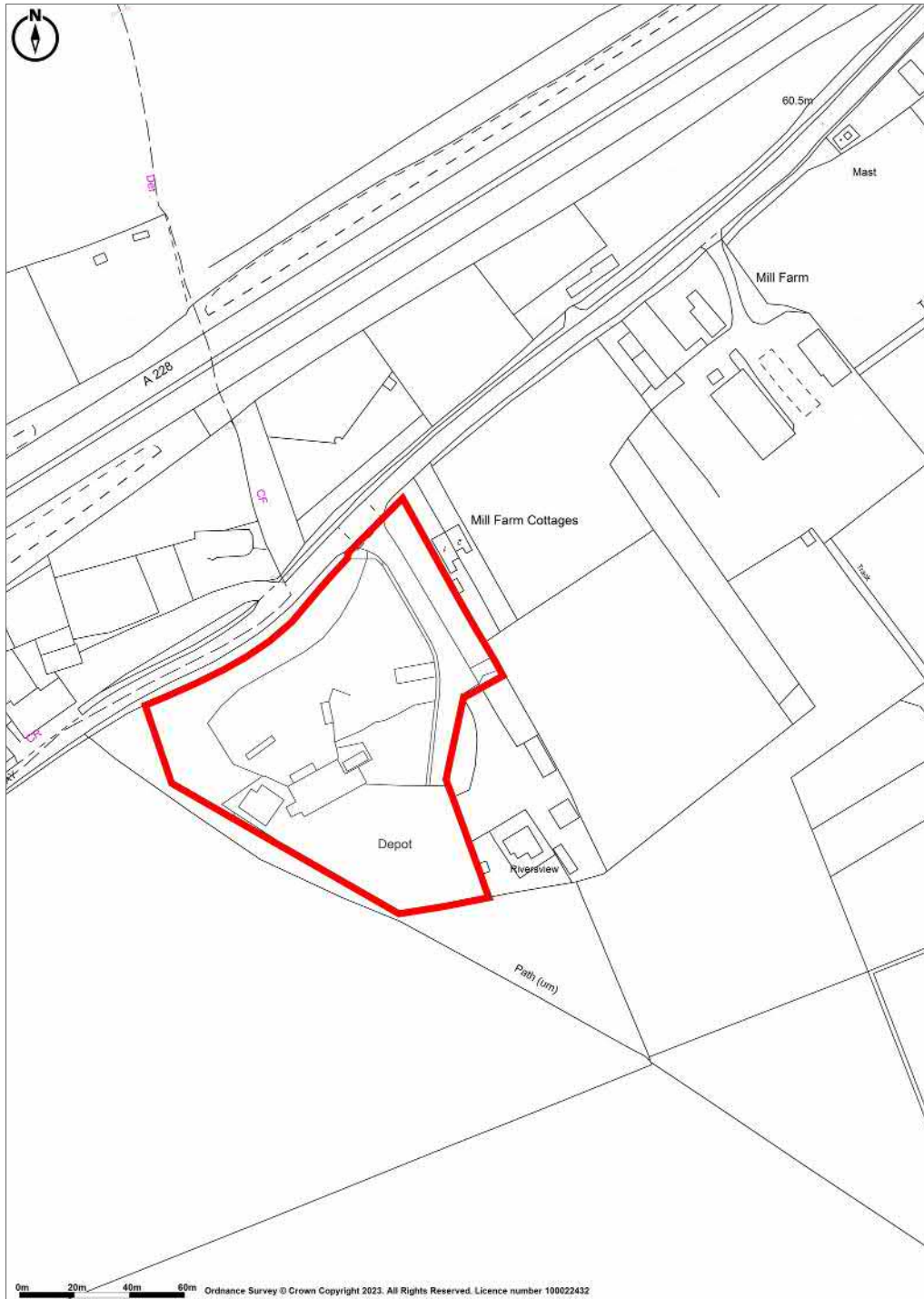
#### The Rural Development Areas

- 7.8. This representation **supports** paragraph 5.40 of the consultation, which sets out that the Hoo Peninsula provides a significant opportunity for the “development for homes, jobs and services”.

- 7.9. This representation **supports** the approach to utilise the Housing Infrastructure Fund (HIF) program to deliver improvements to transport and put measures in place to strengthen the local environment in the Hoo area.
- 7.10. In accordance with Paragraph 5.41 of the 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.

## 8. Summary

- 8.1. It is considered that the provision of housing development being delivered through rural development is supported. On this basis, the site provides an opportunity to deliver much-needed housing development on brownfield land within close proximity to the settlement of Hoo St Werburgh.
- 8.2. This representation promotes The Depot, to the South of Ratcliffe Highway, Hoo St Werburgh, as a potential site allocation in the Future Medway Local Plan 2040. The site has not previously been promoted for development through the Local Plan, and for this reason, the Depot site should be included within the Land Allocations Assessments (LAA) and should be subject to an assessment for stage 2 sites.
- 8.3. For the completeness of this Regulation 18 consultation, the site is considered an **omission** and it should be included in the defined area being promoted as part of the wider rural development area in the Hoo Peninsula.





# Medway Local Plan 2022-2040

**Regulation 18 Consultation –  
Setting the Direction for Medway 2040**

**September 2023**

**[Medway.gov.uk/FutureMedway](https://www.medway.gov.uk/FutureMedway)**



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# Medway Local Plan 2022-2040

## Regulation 18 Consultation – Setting the Direction for Medway 2040

September 2023

### 1. Introduction

- 1.1 Medway Council is preparing a new Local Plan to set the framework for the area's growth up to 2040. The Local Plan will provide a framework for where and how new development can take place.
- 1.2 This document has been published in the first few months of the new Labour and Cooperative Group administration of the Council. This is a statement of the Council's commitment in getting a new Plan in place. The Plan will provide certainty on the direction for Medway's growth and show how the Council will help deliver on its ambitions for the local and global environment, supporting people and boosting jobs and investment in Medway.

#### Comment on Para. 1.2

ArcelorMittal strongly supports the Council's ambitions for boosting jobs and investment in Medway in the new Local Plan - particularly in considering the future of Chatham Docks.

Chatham Docks is a 400-year old commercial port and is a vibrant, working dock operating 24 hours a day, seven days a week.

The docks employ over 800 people – many of whom are local. There are also existing jobs in the supply chains. Overall, there are over 2000 jobs dependent on the docks.

Chatham Docks must be both supported and protected in the new Local Plan.

A raft of documents has previously been sent to Medway Council's planning department for Officers to consider as part of its consideration of this new Local Plan including the following:

- A Viability Report prepared by Medway's leading accountants, Crossley Group, into the economic conditions surrounding commercial tenancy at Chatham Docks that concludes that the return on Chatham Docks is '**above industry expectations and is therefore economically viable from a capital perspective.**'
- A report by marine consulting engineers and ship surveyors, ABP Marine Limited, into the costs of repairing the existing lock gates at Chatham Docks. This report concludes that it would only require a capital outlay of £3.5 million to repair the lock gates rather than the £30 million suggested by Peel L&P.



- An economic and financial assessment of Chatham Docks by Independent Port Consultants concludes that *‘in view of the cost estimate, financial viability and impact on jobs and revenue if the operation is made to close, ending the operation to render the land available for alternative uses **does not make economic sense.**’*

For your convenience we re-submit these reports again as part of these representations on behalf of ArcelorMittal. These representations and a copy of the reports have been emailed to: **futuremedway@medway.gov.uk**

- 1.3 The Council is consulting on this document to get input from local people, businesses, community and interest groups and wider organisations to the direction and content of the new Local Plan. This document considers why we need to plan for Medway’s growth. It looks at where we need to make changes, such as our high streets which have been impacted by changes in shopping patterns. It refers to those aspects of Medway that we want to safeguard for the future, such as beautiful landscapes and historic buildings. This document also outlines potential options for where we may build new homes, workplaces and services, such as schools and surgeries.
- 1.4 This consultation does not detail policies or identify those sites preferred by the Council for new development. That detail will come in the next stage of work on the Local Plan, which the Council will publish next year.

#### **Comment on Para. 1.4**

ArcelorMittal notes that this consultation does not detail policies or identify those sites preferred by the Council for new development and notes that details relating to specific sites will come in the next stage on the Local Plan.

ArcelorMittal submitted representations to the Call for Sites consultation requesting that Chatham Docks be retained as a working, vibrant dock and be promoted for development for continued port use in line with current Local Plan policies ED1 – Existing Employment Areas and Policy E9 – Chatham Docks.

It is a thriving industrial dock. The docks employ over 800 people – many of whom are local. There are also existing jobs in the supply chains. Overall, there are over 2000 jobs dependent on the docks.

Chatham Docks must continue to be both supported and protected in the new Local Plan.

Technical evidence has previously been submitted to the Council on behalf of ArcelorMittal in support of Chatham Docks continued operation which must be taken into consideration when reading these representations. We have re-submitted these technical reports again as part of these representations and they have been emailed to: **[futuremedway@medway.gov.uk](mailto:futuremedway@medway.gov.uk)**

- 1.5 This is a good opportunity for people to contribute to the important discussions about how Medway could change over coming years. This consultation will help to define priorities for our environment, communities and economy. These can then be reflected in how we draw up policies for the new Plan. We also want people to share their views about regenerating the urban centres and riverside sites in Medway, and potential development in suburban and rural areas.

#### [How to get involved](#)

- 1.6 The consultation runs from **Monday, 18 September to Tuesday, 31 October 2023**. Information about the new Local Plan, the consultation documents and reports that provide an evidence base can be found on the Council's website at **[Medway.gov.uk/FutureMedway](https://www.medway.gov.uk/FutureMedway)**

- 1.7 You can view the consultation documents and submit comments through a dedicated consultation platform on the website.

- 1.8 The Council has organised several events during the consultation where people can find out more about the new emerging Plan and share their views on planning for Medway's growth. We will post details on our website.

**Comments must be submitted in writing by 11:59pm on Tuesday, 31 October 2023.**

- 1.9 If you would like further information, or have any questions about the consultation, you can contact the Planning Policy team at:

Email: [futuremedway@medway.gov.uk](mailto:futuremedway@medway.gov.uk)

Telephone: 01634 331629

## 2. Context

- 2.1 The Local Plan will set out the direction for Medway's growth over coming years. It will be a Plan for people who live, work, or study in Medway and visitors. It will be a Plan for Medway as its own place. A complex place, which encompasses distinct towns and villages, with their own strong identity and history. A place of contrasts, from remote marshes and mudflats to busy urban streets. A place of noted heritage, but also looking to the future, with innovation and enterprise, and universities and colleges equipping students with skills for the changing world of work.
- 2.2 People will be at the centre of the Plan. The Council wants Medway to be a healthy place to live, with clean air, high quality, well designed housing, greenspaces for people to enjoy, places for people to mix, and job opportunities to support a good quality of life. Currently there are marked differences in health and wellbeing across communities in Medway. The Plan needs to look at how we plan for the use of land to help people to live healthier and longer lives, and provide safe, connected and sustainable places.
- 2.3 The Plan will consider the diverse communities who make up Medway. Policies for housing, employment, transport, services and community facilities, retail and design need to take account of the needs of different sectors of the community. This will be reflected in the types of housing planned and infrastructure required, such as schools and parks.
- 2.4 The Plan must address big issues for Medway – the environment, high quality energy efficient homes that are affordable and within the reach of residents, health and wellbeing, boosting the economy and tackling deprivation. There are many areas where we need to improve on the current position. The Local Plan is one of the approaches that the Council can take to help address inequalities, poor environmental standards and reduce pressures on services. The plan will be about ambitions that can be achieved for a confident future Medway.
- 2.5 Climate change is a global emergency but needs to be addressed at all levels. Medway as a coastal area is particularly vulnerable to rising sea levels, and changes in temperature and precipitation have impacts for landscape, food production, nature and people. The new Local Plan will help to secure a more resilient future for Medway.
- 2.6 The River Medway is a key asset, providing a strong sense of place and identity. However, the river bisects the area and movement is constrained by four crossings. The severance caused by the river, established commuting flow patterns and travel behaviour, the legacy of post-war development designed for the car, generous car parking provision in dense employment areas and the existing public transport offer make for a challenging environment in which to accommodate Medway's development needs. The

new Plan will need to set out a strategy for how we can reduce car dependency. This will involve thinking differently about how people can move round the central urban areas on foot or bicycle and improving sustainable transport connections from the suburban and rural areas, including consideration of better use of the river for transport. Medway's location in north Kent gives rise to additional opportunities and challenges associated with wider growth, such as the proposed Lower Thames Crossing (LTC).

- 2.7 The Local Plan will be about much more than identifying sites for new housing, but this will be a key part of the Plan and generally attracts the greatest levels of interest at consultation. There are huge pressures on housing. Decent homes are unaffordable for many people. Unfortunately, some of the accommodation locally is sub-standard and there are challenges in securing decent standards with some conversions, particularly where they are undertaken under permitted development. The supply of new housing is central to the new Local Plan, but it is about more than housing numbers. The Plan will seek to improve the choice and mix of homes, drive up quality, and meet the needs of different sectors of the community. Housing-led growth can support wider investment in services and businesses and contribute to shaping the character of new and existing communities.

#### **Comment on Para. 2.7**

The new Local Plan must strike a balance in identifying new sites for housing but not to the detriment of existing jobs and existing important employment generating uses employing local people within the Borough.

Chatham Docks is a vibrant, working dock operating 24 hours a day, seven days a week. The docks employ over 800 people – many of whom are local. There are also existing jobs in the supply chains. Overall, there are over 2000 jobs dependent on the docks.

Chatham Docks must continue to be both supported and protected in the new Local Plan.

- 2.8 The Plan can help Medway to capitalise on its strategic advantages for businesses, with transport links, proximity to London, the cluster of universities and colleges, and a diverse portfolio of employment land from the strategic landholdings at Grain and Kingsnorth, to re-purposing vacant retail units on the High Streets. There are opportunities to redress the flow of commuters from Medway to jobs in London and attract more businesses to set up locally. This is central to Medway's economic strategy, but is challenged by current trends, particularly with cost of living pressures where people are

being attracted to move to Medway for its choice of housing, but retain jobs in London.

- 2.9 The Plan will consider how Medway's infrastructure, such as schools, transport networks, health facilities, parks and community facilities, need to be upgraded in line with a growing and changing population.
- 2.10 This consultation document has been drawn up following the withdrawal of Government funding from the Housing Infrastructure Fund (HIF) for strategic transport and environmental schemes. The HIF programme sought to get key infrastructure in place ahead of growth coming forward in Medway. It is widely recognised that the existing transport networks are under pressure across Medway and upgrades are needed to cope with increased journeys that will come as Medway's communities and businesses expand. Infrastructure and environmental concerns are at the forefront of the Council's work on the new Local Plan. The withdrawal of the HIF funding means that the Council will look at alternatives for securing investment in transport and green infrastructure across Medway, as these remain strategic matters central to the new Plan.

### 3. Vision for Medway in 2040

- 3.1 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 transport, environment, retail and waste and minerals.

The plan's vision is to establish Medway as a leading regional city, connected to its surrounding coast and countryside; with a thriving economy, where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets.

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

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

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

Medway is defined by its river and estuaries. The urban waterfront is animated and accessible. Continuous riverside paths provide attractive and healthy connections, a draw for visitors and residents. The rural character of the Medway Valley and the Medway and Thames estuaries are valued landscapes and habitats are in good condition. There are new opportunities for river transport.

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.

All sectors and ages of the community can find decent places to live. The quality of new development has enhanced Medway's profile, and driven up environmental standards in construction, and older properties have been retro-fitted to improve



sustainability. Custom and self-build housing has provided new living opportunities for residents. Investment in new services and infrastructure, such as transport, schools, healthcare and open spaces, has supported housebuilding to provide a good quality of life for residents.

Our high streets and centres have developed new uses and attractions in response to changes in retail, leisure and work patterns. Medway benefits from a network of centres that reflect the distinct character of its different towns, neighbourhoods and villages.

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

### **Comments on 3.1 Vision for Medway – para. above**

ArcelorMittal notes that *'Medway is a leading economic player in the region'*

Therefore, future housing development in Medway must not be at the expense of existing viable employment generating sites. Chatham Docks – a 400-year old port employing over 800 people and other jobs in the supply chain, many of which are local, must continue to be supported and protected in the new Local Plan.

Medway's economic mineral resources may be worked to meet needs and will be safeguarded from unnecessary sterilisation and for use by future generations. Wharves and rail depots continue to be utilised for the importation and distribution of minerals and will be safeguarded for this purpose. A positive legacy will be left by mineral supply development in Medway.

Waste is managed as far up the Waste Hierarchy as possible to achieve a more circular economy.



## 4. Strategic objectives

- 4.1 The role of the Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment. The Council needs to clearly define what it wants to achieve from the new Plan – what are the issues to address, and what improvements and changes are sought. These are set out as strategic objectives for the Plan. The objectives will feed into the wording of policies and how sites and different locations are assessed for potential development. The objectives are presented around broad themes for the environment, communities, economy, and investment in infrastructure and design that is fit for the future.
- 4.2 The proposed objectives for the Plan are:

### *Prepared for a sustainable and green future*

- 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', and reduce the risk of flooding; promoting the use of nature-based solutions to climate change; seeking to protect the most vulnerable groups from the impacts of climate change; and supporting major shifts in modes of transport used to reduce carbon impacts.
- 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.

### **Comment on Para. 4.2 – bullet point 3 above.**

Chatham Docks is vital to maintaining a '*robust...blue infrastructure network...*'

The river-borne and sea-borne traffic associated with Chatham Docks allows direct sustainable connections with the rest of the South-East and with European ports, rather than just lorry deliveries in and out.

- To ensure the effective management of natural resources, including water and soil, and improving air quality, providing for the sustainable supply of minerals and minimising the production of waste, enabling it to be managed as far up the Waste Hierarchy as possible.

### *Supporting people to lead healthy lives and strengthening our communities*

- To provide for high quality energy efficient homes that meet the housing needs of Medway's communities, reflecting the range of sizes, types and affordability the area needs, including provision for specialist housing, such as for people with disabilities, gypsy and traveller accommodation, the elderly including those wanting to down size, students, first homes, and custom and self-build housing; and drive reductions in the carbon impacts of housing in new developments and securing opportunities for retro-fitting older properties.
- 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.
- To strengthen the role of Medway's urban, neighbourhood and village centres, responding with a positive strategy to changes in retail; supporting independent retail and start-ups, encouraging new business uses into the High Street; securing a range of accessible services and facilities for local communities close to where they live; and realising opportunities for homes and jobs, with the main Town and larger village Centres providing a focus for new retail and community facilities and cultural activities, within the context of the distinct towns, neighbourhoods and villages that make up Medway.

### *Securing jobs and developing skills for a competitive economy*

- To boost the performance of the local economy by supporting local businesses to grow and innovate; and attracting inward investment and re-locations, through the provision of a portfolio of good quality employment land that meets the needs of businesses; and to secure and extend higher value employment opportunities; and reduce out-commuting.
- Build on existing strengths and expertise, such as engineering, energy and creative industries, and raise the profile of key sectors, to attract and develop the jobs of the future.

#### **Comment on 4. Strategic Objectives - Securing jobs and developing skills for a competitive economy**

ArcelorMittal strongly supports the Council's Strategic Objectives to secure jobs and develop skills for a competitive economy – these objectives must be carried forward in continuing to protect Chatham Docks in the new Local Plan.

Chatham Docks is a vibrant, working dock operating 24 hours a day, seven days a week. The docks employ over 800 people – many of whom are local. There are also existing jobs in the supply chains. Overall, there are over 2000 jobs dependent on the docks.

The current Local Plan protects existing employment uses for Chatham Docks and states in Policy ED1: Existing Employment Areas that *'proposals for development resulting in the loss of existing industrial, business or storage and distribution development to other uses will not be permitted.'*

In addition, Policy ED9: Chatham Docks states, *'port-related development and an expansion of the commercial port, as defined on the Proposals Map will be permitted.'*

If the Council is truly seeking to *'boost the performance of the local economy by supporting local businesses to grow and innovate...'* and *'build on existing strengths and expertise, such as engineering...and raise the profile of key sectors...'* then these protective policies specific to Chatham Docks must be carried forward into the new Local Plan.

Chatham Docks employs local people who rely on its operation for their livelihoods. It must not be lost and redeveloped for housing.

There are approximately 180 ship movements a year taking advantage of the non-tidal Docks – it is a very sustainable operation taking full advantage of the Dockside access. The dock use cannot be re-located, there is no other suitable site in Medway for its operation.

ArcelorMittal has submitted a series of technical reports to Medway Borough Council to demonstrate that Chatham Docks is viable and has a future in particular the submitted economic and financial assessment of Chatham Docks by Independent Port Consultants concludes that *'in view of the cost estimate, financial viability and impact on jobs and revenue if the operation is made to close, ending the operation to render the land available for alternative uses **does not make economic sense.**'*

A copy of the economic and financial assessment of Chatham Docks (and others) has been re-submitted to the Council as part of these representations. The reports and representations have been emailed to: **futuremedway@medway.gov.uk**

- To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses; and improve graduate retention.
- 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.
- To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services.
- To support growth in tourism, cultural and creative industries, extending the offer to include green tourism and city breaks, including realising opportunities in the domestic tourism market.

### ***Boost pride in Medway through quality and resilient development***

- To ensure that development is supported by the timely provision of good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served.
- To deliver sustainable development, meeting the needs of Medway's communities, respecting the natural and historic environment, and directing growth to the most suitable locations that can enhance Medway's economic, social and environmental characteristics.
- To secure the ongoing benefits of Medway's regeneration, making the best use of brownfield land, and bringing forward the transformation of the waterfront and town centre sites for high quality mixed use development, and a focus for cultural activities.
- To lift the standards of sustainability and quality in all new development; respond positively to the character and variation of local places across Medway; seeking opportunities for greener construction, to provide for more energy efficient buildings which drives down their carbon impact; demonstrate distinctiveness; and improve the accessibility and design of the public realm that will help people to live healthier lives and open up travel choices, reducing car dependency.

## 5. Developing a Spatial Strategy

### *Development needs*

- 5.1 The Local Plan will include a Policies Map, which will show how land is allocated for new development, such as housing and employment, and where land is protected, such as environmental designations for nature and landscape. The Policies Map and Key Diagram help to communicate Medway's spatial strategy – how we are planning for the future.

### **Comment on Para. 5.1**

It is imperative that Chatham Docks continues to be protected within the new Local Plan as a site protected for port-related development including industrial, business or storage and distribution development both as a designation on the Proposals Map and in Policies within the new Local Plan.

- 5.2 A Local Plan should be positively prepared for sustainable development. It should not be used to stop development that is needed for our growing and changing communities. The Plan should seek to direct and manage growth, so that it provides land for homes, jobs and services, as well as protecting the area's natural resources and historic features.
- 5.3 Government directs Local Planning Authorities to use its 'Standard Method' in determining the scale of housing needed over the plan period. This Standard Method formula for Local Housing Need identifies a need for 1,667 homes a year in Medway, or around 28,500 over the plan period to 2040. This level of housing need is greatly higher than rates of housebuilding seen in Medway for over 30 years. The formula reflects dated demographic projections and has been heavily criticised across the country and there is currently some uncertainty with Government policy. At the time of writing, the Government had not yet published its response to the consultation on revisions to the National Planning Policy Framework, which included consideration of the Standard Method formula.
- 5.4 The Council has raised concerns in Government consultations about the Standard Method. A key matter for Medway is the marked variation in levels of housing needs generated by the Standard Method based on projections from 2014, in comparison to use of more recent demographic projections for Medway's growth. This matter was considered in the Medway Housing and Demographics report supporting the Local Housing Needs Assessment published in 2021, and is illustrated in Figure 1 below, which is an extract from the report. The dwelling-led Standard Method scenario is clearly significantly higher than use of other approaches to forecasts. The Government considers that this method is appropriate to meet its housebuilding ambitions to tackle pressures in the housing market. Notwithstanding the concerns regarding the

methodology, it has to be recognised that there is a housing crisis, particularly regarding affordability and there is an absolute need to provide the right homes in the right places to meet Medway's growing needs and the requirements for those desperately needing a good quality home. There are many existing residents in Medway living in over crowded and/or substandard conditions which is unhealthy or living at home with parents well into their late 30's because they simply cannot afford to live independently in the area they wish to continue to live.

## Medway Growth Outcomes 2021–2037

### Demographic Scenarios

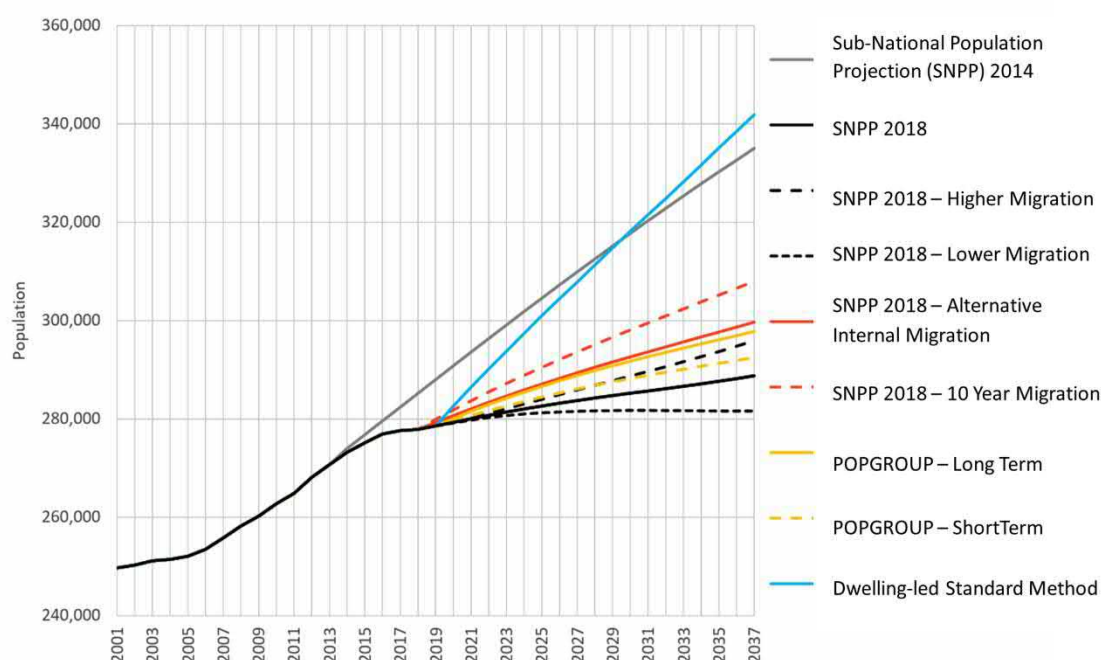


Figure 14: Medway Growth Scenarios, 2001–2037

Figure 1: Extract from [Medway Housing and Demographics report, 2021](#) (page 15) showing alternative approaches to forecasting housing needs

- 5.5 The Council will be reviewing the outcomes of Government consultations and anticipated policy updates in preparing the draft Local Plan for publication next year.
- 5.6 The Council is collating a comprehensive evidence base to inform the new Plan. All potential sites will be assessed for their ability to deliver sustainable development, considering constraints and mitigations, and how they could



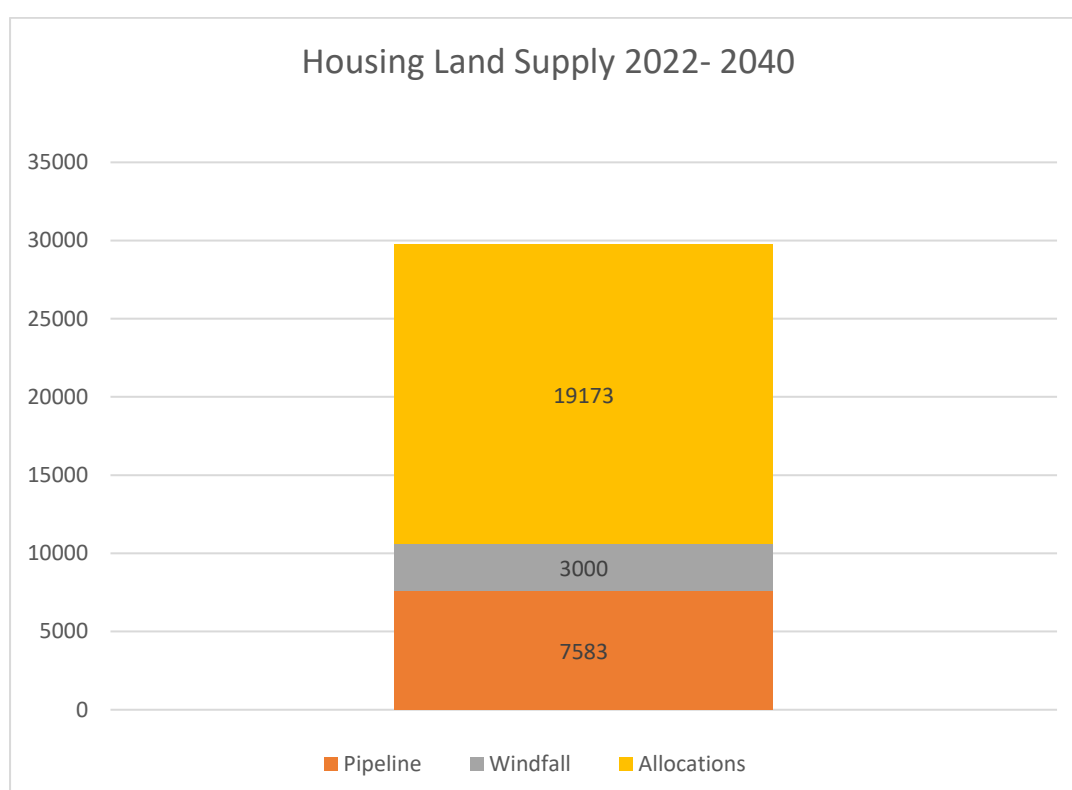
meet the objectives of the Sustainability Appraisal and objectives for the Plan. The Council needs to demonstrate that the growth strategy set out in the Plan can be delivered, to provide certainty and confidence in Medway's growth. Potential sites and locations will be tested against a range of criteria, including transport impacts and viability.

- 5.7 Work to date has highlighted some critical constraints. National Highways has indicated that there is insufficient capacity in parts of the Strategic Road Network to accommodate significant growth. National Highways has identified capacity and safety concerns with M2 Junction 1. Although this is outside of Medway's boundary, it is a key junction for the area, and many residents and workers travel through this junction regularly. There are no plans to upgrade this junction as part of National Highway's plans for the Lower Thames Crossing (LTC). Without a clear scheme in place to address these issues, development of jobs and homes across north and mid-Kent will be stymied. The Council is working with neighbouring authorities and wider stakeholders to prioritise action on M2 Junction 1. This matter would need to be addressed in the Local Plan, with policies showing how impacts could be mitigated and improvements delivered.
- 5.8 In addition to this current issue, further transport impacts are expected with the development of the LTC. The LTC is focused on a defined scheme for its primary route and tunnel. The scheme does not provide for improvements that may be needed to parts of the surrounding roads network that would be impacted as a result of the new crossing. The new crossing is forecast to generate new trips, as well as re-routing existing journeys, as drivers divert from Dartford.
- 5.9 This is a particular concern for Medway, as the modelling assumptions used in planning for the LTC underestimate the amount of development growth that would be expected in the new Local Plan. There are concerns that the road network will not have the capacity to accommodate the higher levels of homes and jobs planned in Medway. This raises uncertainty for the capacity of the highway network to meet the full scale of development needs over the plan period. This could be a strategic constraint to development and the Plan would need to reflect lower levels of growth in Medway, with the consequent impact on delivery of new jobs and homes to Medway's need and related affordability of homes.
- 5.10 Further consideration will be given to potential impacts on the environment, especially the designated habitats and landscapes which form a large part of Medway's area, and strategic infrastructure needs. The Council will need to assess how negative impacts can be avoided, or mitigated, such as through delivery of new services.
- 5.11 In addition to assessing how to meet Medway's needs for 28,500 new homes over the Plan period, the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham's housing needs, following a request from the neighbouring borough.



### *Potential land supply for development*

- 5.12 The housing needs for Medway over the plan period of 2022-2040 is for 28,339 homes. Providing for a buffer to allow for some sites not coming forward for development would lift the total plan period need to over 29,000 homes.
- 5.13 There is an existing 'pipeline' of sites with planning permission for over 7,500 homes, not yet built, which contribute towards meeting the total need in the Plan. Authorities can also make allowance for 'windfall sites' – those that come forward for development outside of Local Plan allocations. Taking account of these two sources of supply, the Council is assessing options to make provision for site allocations for over 19,000 homes to meet needs in Medway.



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

- 5.14 This is a high level of need and the Council has carried out a comprehensive and iterative review of potential sources of land for development allocations. The Council has produced a Land Availability Assessment (LAA) to be published with this consultation document. The LAA has been informed by a Call for Sites, where the Council invited developers, landowners and other parties to put forward sites for consideration as potential development allocations. Planning officers also identified sites from other sources, such as development briefs, the Brownfield Land Register and withdrawn planning applications. An initial high-level assessment has screened out sites that are

too small. Further work will consider the scope for overcoming constraints to achieve sustainable development.

#### **Comment on para. 5.14**

ArcelorMittal submitted representations to the Call for Sites consultation requesting that Chatham Docks be retained as a working, vibrant dock and be promoted for development for continued port use in line with current Local Plan policies ED1 – Existing Employment Areas and Policy E9 – Chatham Docks. The docks employ over 800 people – many of whom are local. There are also existing jobs in the supply chains. Overall, there are over 2000 jobs dependent on the docks.

Chatham Docks must continue to be both supported and protected in the new Local Plan.

- 5.15 The LAA has identified land with the potential capacity for c 38,200 homes, which will proceed to the next stage of detailed assessment, along with the Sustainability Appraisal process. Many of these sites are subject to constraints, including environmental considerations, infrastructure requirements and viability. It is likely that many of these sites will not be found suitable, available and achievable for sustainable development and will be removed at the next stage of assessment and Sustainability Appraisal. A range of mitigation measures will be required to achieve the scale of housing needed for the Plan. The scale of proposed growth is anticipated to have significant impacts across Medway. This level of housebuilding would mean the transformation of urban centre and waterfront areas and large-scale development in suburban and rural areas.

#### **Comments on para. 5.15**

ArcelorMittal submitted representations to the Call for Sites consultation requesting that Chatham Docks be retained as a working, vibrant dock and be promoted for development for continued port use in line with current Local Plan policies ED1 – Existing Employment Areas and Policy E9 – Chatham Docks.

ArcelorMittal notes the reference to *‘this level of housebuilding would mean the transformation of...waterfront areas...’* This should not and cannot be to the detriment of existing, viable employment generating sites such as Chatham Docks.

Evidence submitted to the Council on behalf of ArcelorMittal confirms that Chatham Docks is viable and has an important and significant role in Medway and the South-East. In particular, the submitted economic and financial assessment of Chatham Docks by Independent Port Consultants concludes that *‘in view of the cost estimate, financial viability and impact on jobs and revenue if the operation is made to close, ending the operation to render the land available for alternative uses **does not make economic sense.**’*

Chatham Docks is a thriving industrial dock. The docks employ over 800 people – many of whom are local. There are also existing jobs in the supply chains. Overall, there are over 2000 jobs dependent on the docks.

There are approximately 180 ship movements a year taking advantage of the non-tidal docks – it is a very sustainable operation taking full advantage of the Dockside access. The dock use cannot be re-located, there is no other suitable site in Medway for its operation.

Chatham Docks must continue to be both supported and protected in the new Local Plan.

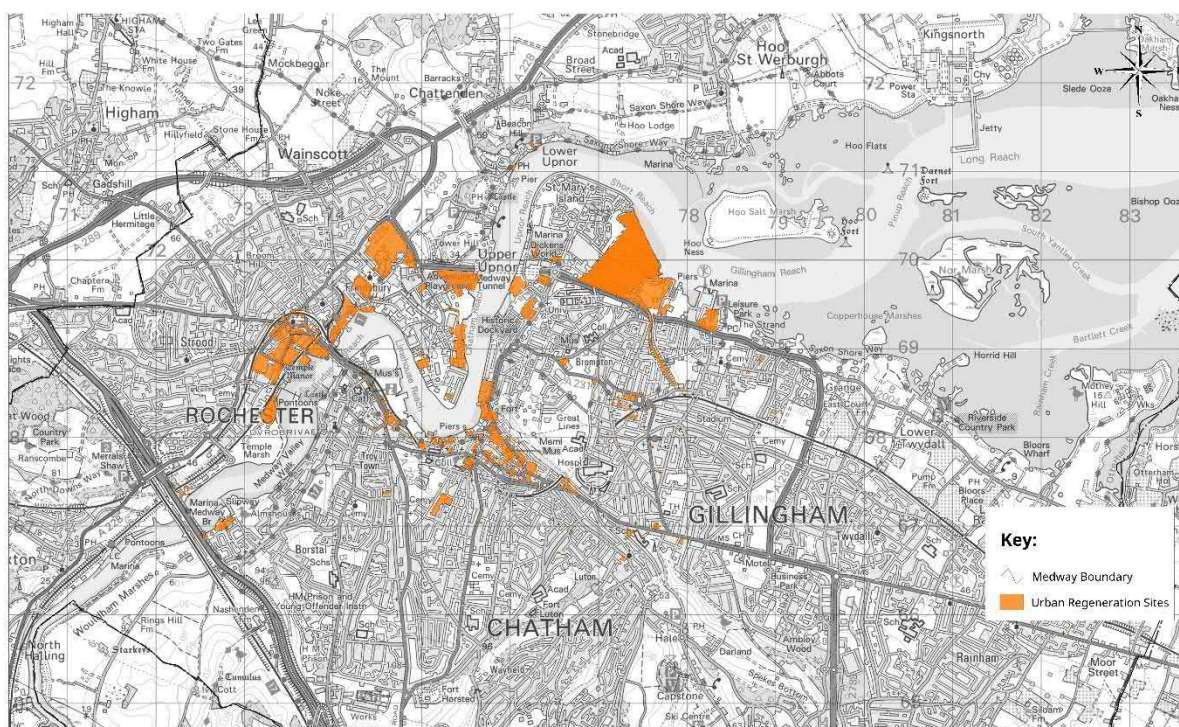
- 5.16 The Council has identified four broad categories of locations where development could take place, reflecting Medway's geography. Indicative housing capacities from the LAA for the different areas are presented for each category (Note, this is NOT allocating numbers to allocated sites but merely reflects the LAA):

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

*Table 1: Potential sources of housing land supply by category*

- 5.17 These broad locations are considered in more detail below.

## Urban Regeneration



Title: Urban Regeneration Sites

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### Map 1 – overview of potential sites for Urban Regeneration

#### Comments on Map 1

We note that the Chatham Docks site has been marked for regeneration on the Map 1 as a potential housing site.

ArcelorMittal objects to this designation for regeneration for housing use.

Peel L & P – freeholder of Chatham Docks – has promoted Chatham Docks as part of the Call for Sites consultation for residential use stating that the existing dock operation is unviable. This is incorrect.

Evidence has been submitted to the Council on behalf of ArcelorMittal – long leaseholders at the docks - and confirms that Chatham Docks is viable and has an important and significant role in Medway and the South-East. In particular, the submitted economic and financial assessment of Chatham Docks by Independent Port Consultants concludes that *‘in view of the cost estimate, financial viability and impact on jobs and revenue if the operation is made to close, ending the operation to render the land available for alternative uses **does not make economic sense.**’*

ArcelorMittal also submitted representations to the Call for Sites consultation requesting that Chatham Docks be retained as a working, vibrant dock and be



promoted for development for continued port use in line with current Local Plan policies ED1 – Existing Employment Areas and Policy E9 – Chatham Docks.

As demonstrated in the submitted technical evidence, Chatham Docks is a thriving industrial dock. The docks employ over 800 people – many of whom are local. There are also existing jobs in the supply chains. Overall, there are over 2000 jobs dependent on the docks.

There are approximately 180 ship movements a year taking advantage of the non-tidal docks – it is a very sustainable operation taking full advantage of the dockside access. The dock use cannot be re-located, there is no other suitable site in Medway for its operation.

The Local Plan cannot state in one place that it will support local businesses and existing employment, but then designate a thriving business employing many local people for housing development where that existing use will then be lost.

Chatham Docks must continue to be both supported and protected in the new Local Plan and not allowed to be lost to the detriment of people living within this Borough and their existing jobs at the docks.

**Sites with the potential for urban regeneration could provide the capacity for 11,151 homes.**

- 5.18 Medway has been successful in transforming its urban waterfront and centres in recent decades, with areas such as St Mary's Island, Chatham Waters, Victory Pier and Rochester Riverside. The Council has been leading on Medway's regeneration, setting out strategies to realise new opportunities, securing millions in external funding, preparing land for redevelopment, and working closely with partners and developers to deliver change. The Council is also identifying where it has underused sites that could make better use of brownfield land for new development, and is bringing forward new homes and business space in areas such as Chatham Waterfront. This commitment to urban regeneration continues to form an intrinsic part of our strategy for Medway's growth in coming years.
- 5.19 The new Local Plan will draw on the existing policies, strategies and programmes that promote the regeneration of Medway's urban centres and waterfront. This work creates a supportive policy environment for redevelopment in these areas. In drawing up the growth strategy for the new Plan, the Council's starting point is regeneration and making the best use of vacant or under-utilised brownfield land. Sites which are already identified in Council documents such as the town centre masterplans for Chatham, Gillingham and Strood, and development briefs for Strood Waterfront, are likely to be included as site allocations in the new Local Plan. Such sites could

deliver thousands of homes, as well as commercial floorspace for businesses and services and contribute to our wider strategies for supporting our high streets and centres in adapting to wider changes in retail patterns.

- 5.20 The regeneration opportunities vary across Medway's urban area, reflecting the different characteristics of our towns. Some sites offer the potential for taller buildings and a modern urban character; other sites are more sensitive to the historic surroundings and their environmental setting. The Council recognises the distinctive and varied character of Medway. Urban regeneration does not mean a standard approach to density and design, but consideration of the most appropriate approach in different areas. The Council's work on the Chatham Design Code is assessing in detail how new development would best fit with the centre's heritage, landscape and infrastructure. It will provide guidance on building heights and massing, design of public spaces and transport links to ensure that redevelopment in central Chatham optimises the potential of the area. Similarly, the Chatham Intra Development Framework takes a heritage-led approach to managing potential change, reflecting the area's special character and historic significance. If such areas are to provide new homes, workspaces and services, it is critical that people and the environment are at the centre of plans – with green spaces, sustainable design, play areas, and places to rest and socialise. The Plan must promote a coherent strategy that looks at managing change to create an attractive and sustainable place for people to live, work and visit.
- 5.21 In addition to these sites, the Council is also considering the potential for wider development in urban waterfronts. Land has been promoted for redevelopment at Chatham Docks and Medway City Estate. These large sites could provide for new homes as well as workspace for businesses and services. Such major redevelopment would have a marked impact on the area and would involve the relocation of existing businesses.

### Comments on Para. 5.21

Peel L & P – freeholder of Chatham Docks – has promoted Chatham Docks as part of the Call for Sites consultation for residential use stating that the existing dock operation is unviable. This is incorrect.

Evidence has been submitted to the Council on behalf of Arcelor Mittal – long leaseholders at the docks - and confirms that Chatham Docks is viable and has an important and significant role in Medway and the South-East. In particular, the submitted economic and financial assessment of Chatham Docks by Independent Port Consultants concludes that *'in view of the cost estimate, financial viability and impact on jobs and revenue if the operation is made to close, ending the operation to render the land available for alternative uses **does not make economic sense.**'*

ArcelorMittal also submitted representations to the Call for Sites consultation requesting that Chatham Docks be retained as a working, vibrant dock and be promoted for development for continued port use in line with current Local Plan policies ED1 – Existing Employment Areas and Policy E9 – Chatham Docks.

As demonstrated in the submitted technical evidence, Chatham Docks is a thriving industrial dock. The docks employ over 800 people – many of whom are local. There are also existing jobs in the supply chains. Overall, there are over 2000 jobs dependent on the docks.

There are approximately 180 ship movements a year taking advantage of the non-tidal docks – it is a very sustainable operation taking full advantage of the dockside access. The dock use cannot be re-located, there is no other suitable site in Medway for its operation.

The Local Plan cannot state in one place that it will support local businesses and existing employment, but then designate a thriving business employing many local people for housing development where the existing use will then be lost.

Chatham Docks must continue to be both supported and protected in the new Local Plan and not allowed to be lost to the detriment of people living within this Borough and their existing jobs at the docks.

### *Opportunities*

- 5.22 The central urban areas benefit from good public transport links, existing services and businesses, universities and colleges and major visitor attractions. These offer sustainable locations for new development, in line with national planning policy. There are underused and vacant sites, reflecting changes in work and retail patterns over a number of years. These locations have the potential for higher density development, making the best use of previously developed land. The accessibility of town centre sites can offer attractive living environments for a wider range of people. Town centre regeneration is not limited to flats for younger people but has the potential to meet the needs of older people and families. The plan will need to reflect the needs of wider communities in shaping policies and allocations for central areas.
- 5.23 Vacant units on the High Street could be redeveloped with space for businesses and community services on the ground floor, with new homes on higher floors. As businesses, particularly office-based activities, look at new models of working, town centre sites could have an important role in diversifying our employment land offer.



## *Issues and Constraints*

- 5.24 The continued success of urban regeneration in Medway will involve directing new homes to locations where everyday needs can be met; these locations are already – or could be – well-served by public transport for medium and long-distance journeys. If we do not achieve meaningful shifts in how people travel, the centres and surrounding roads will be subject to further congestion, with associated air quality and amenity issues, and development will be constrained by levels of car parking.
- 5.25 The waterfront is an important area for nature and much of the river in central Medway is a designated Marine Conservation Zone. This means that the impacts of development, such as light, noise and other disturbance on the river may need to be considered. As a coastal authority, Medway is also subject to the impacts of rising sea levels with climate change. This is a particular consideration in planning for the redevelopment of waterfront sites, and the need to futureproof buildings. Much of Medway's noted heritage is located in the central urban areas, such as the Chatham Historic Dockyard and its defences, and Rochester Castle and Cathedral. New development must be sensitive to the historic significance of its surroundings.
- 5.26 Sites considered in this development involve the redevelopment of brownfield sites, sometimes with demolition, conversion or land decontamination required. Development of such sites tends to have higher costs for these reasons, and this can affect viability, meaning that the sites are not attractive to the market, or lower quality schemes are built. The Council is testing the viability of sites through its work on the Local Plan and will consider how policy can encourage redevelopment in these areas. Some sites identified for potential allocations in the new Plan have not been proposed by land owners or developers, but from the Council's work in assessing land availability and development briefs. The Council will seek to engage with the development sector to encourage them to consider promoting their sites.
- 5.27 There are key opportunities for urban regeneration and potential for thousands of new homes. It will be important to ensure that homes are supported by services, including new schools and health facilities. Planning for major redevelopment must be for sustainable development.
- 5.28 There are sites promoted for development in urban areas which would involve significant changes to employment land at Chatham Docks and Medway City Estate. These raise issues on the possible re-location of existing businesses, as well as the types of new businesses that may be attracted to the areas. Conflict with surrounding land uses is also a key matter, particularly where residential areas may be coming forward next to busy employment sites. A strategic and comprehensive approach is critical to avoid piecemeal development that may not provide good living standards and could create tension with surrounding land uses.

### Comment on Para. 5.28

Peel L & P – freeholder of Chatham Docks – has promoted Chatham Docks as part of the Call for Sites consultation for residential use stating that the existing dock operation is unviable. This is incorrect.

Evidence has been submitted to the Council on behalf of ArcelorMittal – long leaseholders at the docks - and confirms that Chatham Docks is viable and has an important and significant role in Medway and the South-East. In particular, the submitted economic and financial assessment of Chatham Docks by Independent Port Consultants concludes that *‘in view of the cost estimate, financial viability and impact on jobs and revenue if the operation is made to close, ending the operation to render the land available for alternative uses **does not make economic sense.**’*

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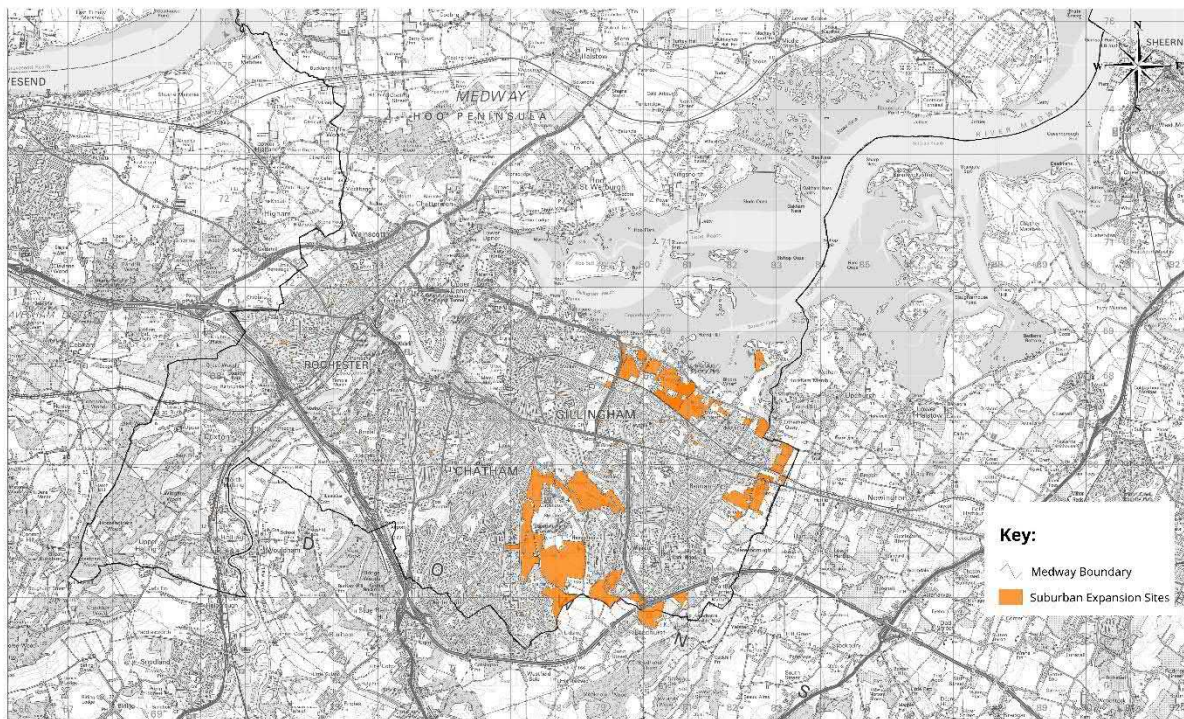
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There are approximately 180 ship movements a year taking advantage of the non-tidal docks – it is a very sustainable operation taking full advantage of the Dockside access.

The dock use cannot be re-located, there is no other suitable site in Medway for its operation.

Chatham Docks must continue to be both supported and protected in the new Local Plan and not allowed to be lost to the detriment of people living within this Borough and their jobs at the docks.

## Suburban Expansion



**Title: Suburban Expansion Sites**

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### Map 2 – overview of potential sites for Suburban Expansion

**Sites with the potential for suburban expansion could provide the capacity for 9,680 homes.**

5.29 This category considers the areas for potential growth adjoining the existing urban areas to the south and east of Medway. These are largely located to the north and east of Rainham and in the Capstone and Hempstead area to the south. The existing suburban neighbourhoods are home to many of Medway's residents, and key services and employment areas. The undeveloped land around the suburbs is valued as a contrast to the large urban conurbation, providing important green lungs within an otherwise dense urban area and includes the popular country parks at Capstone and Riverside. Historically these areas have been important for farming, such as the north Kent fruit belt, from which the county gets its recognition as the Garden of England. There are key landscape links to the estuary in the north and the Kent Downs to the south. Car ownership rates are higher in this part of Medway, and there are congestion hotspots on the highways network, particularly along the A2.

### Opportunities

5.30 The large towns and neighbourhoods in the south and east of Medway are popular places for people to live. Developers are actively promoting land in this area through the Local Plan and planning applications. Development on the green field sites in this category would be expected to be built out quickly,



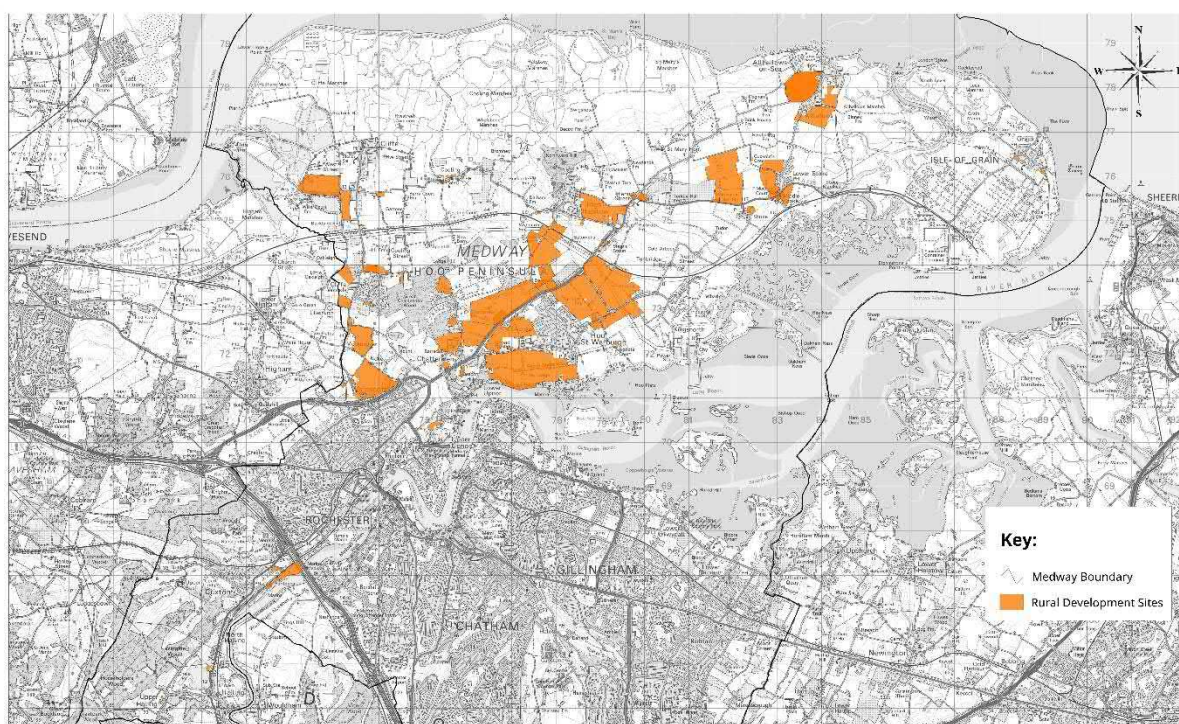
responding to market demand and more limited site constraints than brownfield sites.

- 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.

### *Issues and Constraints*

- 5.32 Much of the land around the north and east of Rainham is the best and most versatile farmland, although many fields are not in active agriculture use. The area to the south is within the setting of the Kent Downs Area of Outstanding Natural Beauty, and undeveloped land forms an important component of our green infrastructure networks. The area to the north lies close to the Medway Estuary, which is designated a Special Protection Area, Ramsar site and Site of Special Scientific Interest, recognising its international and national importance for wildlife.
- 5.33 The A2 is an important transport corridor, but experiences congestion and has been designated an Air Quality Management Area. There is a risk that major development in these suburban locations could generate further dependencies on car-based travel, adding to congestion and pollution, and undermining Medway's ambitions for sustainable development. Much of the potential development south of the M2 is anticipated to travel towards the M2 via junction 4 which may need to be improved to accommodate additional traffic.
- 5.34 Although potential sites could be developed in proximity to existing towns and neighbourhoods, there is not sufficient capacity in existing services, such as schools and health services, to cater for an increased population. New housing would need to make provision for expanded and new services. Similarly, schemes that focus on homes and not jobs and services could result in unsustainable development and increase people's need to travel.
- 5.35 Land in this area lies close to Medway's boundary with neighbouring authorities, particularly Swale and Maidstone. Development in these locations would potentially have a cross-border impact. Development to the east of Rainham would erode the strategic gap between Rainham and Newington and add further to the congestion and pollution issues on the A2. Development to the south around the Capstone Valley would potentially adjoin the development of the proposed 'Lidsing Garden Community' in Maidstone. The landowner is promoting a cross-border masterplan. There are a number of potential impacts, including transport, infrastructure and the natural environment.

## Rural Development



Title: Rural Development Sites

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Map 3 - overview of potential sites for Rural Development

**Sites with the potential for development in the rural areas could provide capacity for 14,736 homes.**

- 5.36 Although Medway is largely an urban authority by population, the majority of its land is rural. Much of the countryside is on the Hoo Peninsula to the north of the borough, as well as the Medway Valley to the south west. Rural Medway is markedly different in character to the urban towns and neighbourhoods. The villages in the Medway Valley sit within the setting of the Kent Downs and the river. The Hoo Peninsula sits between the Thames and Medway estuaries. Much of the periphery of the peninsula is designated as Special Protection Areas (SPAs) and Ramsar sites, recognising its international importance for nature, particularly migrating birds. There are further Sites of Special Scientific Interest (SSSI) across the peninsula, which are of national importance. The coastal marshes and mudflats and areas of woodland shape the distinctive character and feel of the peninsula. These landscapes are valued for their sense of place and remoteness, all the more special, given their proximity to urban Medway.
- 5.37 The peninsula includes areas of the best and most versatile land for agriculture, and there is a strong farming presence. However, the area is also characterised by wider industries, particularly the legacy of the energy sector at Grain and Kingsnorth. These two large brownfield sites form an important part of Medway's employment land supply and offer unique opportunities for

further jobs growth such as realising opportunities for green technology as the country moves to zero-carbon.

- 5.38 There are a number of villages on the peninsula, with the largest being Hoo St Werburgh. Hoo has a population of over 10,000 people and provides services, such as schools and sports facilities to the wider villages on the peninsula. However, many residents travel off the peninsula to reach workplaces, shops and other services. There are high levels of car ownership and public transport services are limited in a number of areas.
- 5.39 The vast majority of sites that have been put forward for potential development in rural Medway (outside of the Green Belt designation) are on the Hoo Peninsula. Most of the sites are promoted for housing led development, with the exception of the larger employment sites. It is noted that many of the sites promoted for development on the Hoo Peninsula are large scale, each potentially providing land for hundreds of homes.

### *Opportunities*

- 5.40 There is significant land for potential development for homes, jobs and services on the Hoo Peninsula. The Council has recognised this potential through its work on the Local Plan, and considering options for how Medway can grow in the future. The Council has considered the potential for large scale growth on the peninsula through its work on the draft Hoo Development Framework which was published for consultation in 2022. The Housing Infrastructure Fund (HIF) programme sought to deliver improvements to transport and put measures in place to strengthen the local environment. These would provide certainty in planning for future development in the area, and in assessing sites across Medway in the context of constraints and possible mitigations in preparing the Local Plan.
- 5.41 In the absence of the HIF funding programme, the opportunities and issues still remain key considerations in the preparation of the new Local Plan. Large scale development around Hoo St Werburgh and neighbouring villages could provide for planned growth, where new housing is supported by new and improved services and infrastructure. Such development could also help to meet the Council's ambitions for greener growth, with higher environmental standards in construction, communities better connected for walking and cycling, and within easy reach of local services.
- 5.42 The peninsula also has a key role in Medway's economic development strategy, with major sites at Grain and Kingsnorth offering potential for new employment sectors and being regional hubs in energy and green technology industries, contributing to de-carbonisation of the economy. The area's environment also offers opportunities to develop green tourism, based on assets such as the estuaries and the spectacular shows of birdlife. Agriculture will continue to be an important land use for the peninsula.

### *Issues and constraints*

- 5.43 The Hoo Peninsula has significant potential for further development, as part of Medway's wider growth in coming decades. This is shown in the extensive number of sites promoted for development on the peninsula, and the scale of potential sites. However, there are a number of specific considerations for development on the peninsula.
- 5.44 The area's special and distinctive environment is a primary consideration. The Local Plan will set out a strategy, not just for development, but also for strengthening our green infrastructure networks and sites. Biodiversity, landscape, and water management are just some of the key matters in environmental planning. The Council will assess the potential impacts of possible development sites on different aspects of the natural environment, with specific attention to the designated areas, such as SSSIs and the SPAs.
- 5.45 A further strategic consideration is the capacity of infrastructure to support major growth on the Hoo Peninsula. Transport networks would need to be upgraded. The roads network is limited, with particular concerns on the capacity of Four Elms roundabout and congestion on the adjoining roads, which exacerbates air pollution. Bus services reflect the rural nature of the area, with reduced frequency compared to urban Medway. The Council will require major transport schemes to provide for sustainable transport choice and increase the capacity of the road network, to facilitate growth on the Hoo Peninsula.
- 5.46 Similarly wider investment is required in wider services, such as schools and health and leisure facilities, to support larger communities, as the existing infrastructure reflects the area's rural character and villages. Large scale growth would need careful planning for phasing and design to provide for sustainable development.



## Green Belt Release



Title: Greenbelt Sites

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Map 4 – overview of potential sites for Green Belt release

**Sites with the potential for development in the Green Belt could provide the capacity for 2649 homes.**

- 5.47 There is a common confusion with the technical jargon used in Planning between Green Belt and greenfield land. Green Belt is a specific policy designation around major cities. Greenfield is used to refer to undeveloped land, like fields, in contrast to brownfield sites, which have previously been developed. National planning policy attaches great weight to Green Belt policy which places limits on development. Greenfield sites do not have the same level of protection in national planning policy.
- 5.48 Land in the west of Medway forms part of the Green Belt around London. The Metropolitan Green Belt aims to stop the outward growth of Greater London into the surrounding countryside, towns and villages. National planning policy states that the principal aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open.
- 5.49 Just under 5% of land in Medway is designated as Green Belt. These areas adjoin Green Belt land in Gravesham and Tonbridge and Malling. Both of these boroughs have significantly higher proportions of land covered by the Green Belt designation. As well as preventing the outward expansion of London, at a more local level, the Green Belt prevents coalescence of towns and villages. It provides a strategic gap between Strood and Higham, and

between Snodland and Halling. The Council has carried out a review of land in Medway in the Green Belt, which shows that the purposes of the policy are being met.

- 5.50 There is a strong presumption in national planning policy that Councils should seek to protect the Green Belt from development, and where needing to allocate land for growth, sites outside of the Green Belt should be considered in preference to Green Belt release.

### *Opportunities*

- 5.51 In the context of high levels of housing need across Medway and neighbouring boroughs, Councils are looking at all options for how they can provide for sufficient homes in their Local Plans. The boroughs of Gravesham and Tonbridge and Malling both have high levels of land covered by the Green Belt designation. The Lower Thames Crossing is proposed to the east of Gravesend and this will involve significant change in the area between Gravesend and Strood. This context of major infrastructure investment needs to be considered in reviewing potential release of land in the Green Belt. In work on its emerging Local Plan, Gravesham Borough Council has identified a potential development allocation immediately to the west of Medway, near Strood. This would significantly narrow the Green Belt land in this location, and impact on the function of the remaining Green Belt land adjoining Strood in Medway. Developers are promoting separate sites in both Medway and Gravesham for Green Belt release. Development in Medway could provide for a limited number of homes, in proximity to transport networks and services in Strood.
- 5.52 A larger area of land in the Medway Valley across the borough boundaries of Medway and Tonbridge and Malling is being promoted through the Councils' respective Local Plans. This could form a cross-border strategic development, or separate allocations in the two Council areas. Development at this scale would provide for new services, including schools, as well as homes.

### *Issues and Constraints*

- 5.53 In addition to the strong policy presumption against development in the Green Belt, much of the land in Medway's part of the Green Belt is also part of the Kent Downs Area of Outstanding Natural Beauty (AONB). The AONB designation and its setting is also afforded significant weight in national planning policy to protect land from major development. The potential cross-border proposal in the Medway Valley would have significant impacts on the AONB. The Council would be expected to evidence a case for development in such a location and how landscape impacts could be mitigated.
- 5.54 Both sites are located close to major transport corridors, which already carry high levels of traffic, and are forecast to be impacted by the LTC. There are queries as to the capacity of such sites to accommodate travel needs and to provide for sustainable transport options.



## Employment Sites



Title: Employment Sites

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### Map 5: overview of potential employment site allocations

5.55 A sustainable development strategy provides for homes, jobs and services. Housing sites in the strategy tend to attract the greatest interest, but it is important to draw up a balanced plan for Medway. This includes setting out our plan for boosting jobs and supporting businesses to expand, start up, or be relocated in and to Medway. The choice and quality of sites available to businesses is critical to our economic development strategy.

### Comment on para. 5.55

ArcelorMittal agrees that it is important to draw up a balanced plan for Medway in terms of providing homes, jobs and services. However, the future of Medway must not include the closure of a viable, active, employment generating, working port at Chatham Docks for housing redevelopment to seek to meet housing numbers. This would lead to the loss of at least 800 jobs and a potential further loss of jobs in the supply chains.

Chatham Docks is a thriving industrial dock. The docks employ over 800 people – many of whom are local. There are also existing jobs in the supply chains. Overall, there are over 2000 jobs dependent on the docks.

There are approximately 180 ship movements a year taking advantage of the non-tidal docks – it is a very sustainable operation taking full advantage of the Dockside access. The dock use cannot be re-located, there is no other suitable site in Medway for its operation.

Chatham Docks must continue to be both supported and protected in the new Local Plan and not allowed to be lost to the detriment of people living within this Borough and their existing jobs at the docks.

- 5.56 The main employment areas are currently spread across Medway, reflecting historic patterns and the geography of separate towns and villages. Businesses also orientate to sites that meet their needs for access, space, connectivity and services, and in some cases, proximity to linked businesses.
- 5.56 The plan is to consider the need for more employment floorspace for businesses. The Medway Employment Land Assessment, 2020 indicated a need for c 62.3 hectares of employment land up to 2037. The majority of the land would be needed for warehousing and distribution activities.

### *Opportunities*

- 5.57 A number of sites are being considered through the Land Availability Assessment for employment allocations in the new Local Plan. These include the strategic sites at Grain and Kingsnorth on the Hoo Peninsula, with unique opportunities in specialist sectors, such as energy and green technology, and making use of wharfage facilities.
- 5.58 The Innovation Park Medway seeks to provide high quality business space that continue to build Medway's profile for high value jobs and sectors.
- 5.59 The diverse sites provide space for very different industries, allowing Medway to attract inward investment and meet the needs for businesses to grow locally.

### *Issues and Constraints*

- 5.60 Transport infrastructure is again a key consideration with employment land. Plans to expand business uses may be challenged by limited capacity on roads, and poor public transport connections. There are specific issues with the Strategic Road Network as highlighted above.
- 5.61 In addition, there are impacts on local roads, particularly where businesses involve warehousing and distribution uses.
- 5.62 The Council will need to carefully consider the impacts of employment land proposals to provide direction on the capacity of transport networks and the requirements for sustainable travel options.

## 6. Next steps

- 6.1 The Council is continuing to collate a wide evidence base to support the new Plan. It is carrying out further assessments of potential sites, to identify which locations could provide for sustainable development. Infrastructure is a major concern, and there is specific work on transport and infrastructure planning to feed into the draft Plan. The evidence base will also be reflected in the details of new policies in the Plan.
- 6.2 Following this consultation, the Council will collate all written comments received and analyse them to show the key issues raised and suggestions for the direction and content of the new Plan. The comments will be published on the Council's website, with sensitive personal information removed. The Council will also publish how it has responded to the issues raised. The consultation comments will be submitted to the independent Local Plan Inspector, when the Council submits the Plan for examination next year.
- 6.3 The Council will use the information collected through the consultation to prepare the next stage of its work on the Local Plan. It will review the vision and strategic objectives for the Plan in the light of the comments raised, and will draw up a strategy for Medway's growth, based on the options set out in this document. Establishing a vision and strategic objectives will help to select sites for allocation, having identified the range of potential sites available for development through the Land Availability Assessment, which will be integrated with the Sustainability Appraisal.
- 6.4 The next stage will be the publication of a draft Plan, presenting the policies and site allocations that the Council intends to submit for examination, as its preferred strategy for managing Medway's growth up to 2040.

**From:** Rosie Beattie [REDACTED]  
**Sent:** 31 October 2023 21:03  
**To:** futuremedway  
**Subject:** Regulation 18 Consultation – Setting the Direction for Medway 2040

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Reg 18 email Responses

Dear Sir,

I am sending you my comments on the Medway Local Plan consultation by email as the consultation portal only permits submissions of up to 100 words and having submitted two short paragraphs, the 'speech bubble' icon disappeared from all pages thereby preventing further comment. Either the system is defective or designed to permit only two comments per person. This needs to be improved for the Local Plan consultation itself when the time comes.

On the same note, the consultation events of which there were seven, were seemingly designed to exclude the working person and taxpayer. Six of them were scheduled to take place during the normal working day. One was scheduled to a short morning slot at the Pentagon on a Saturday, however if one already had an engagement and the event notice periods were short, then it was impossible to attend any event at all. I therefore hope that any future consultation events will be mindfully scheduled to be inclusive to all demographics, not only the retired and unemployed. ONS statistics show that of the adult population 75% are in employment. Of those, 75% are in full time employment. Hence the need by the council to schedule any consultation events with this in view.

I note the focus on the notion of Net Zero and would like to say that there has not been a consultation within Medway as to whether the residents support this as a goal. Given the levels of green taxes and associated costs and the obligations that surround the new and lucrative 'green industries', I would suggest that this is put to the people rather than taken as a given, as the Conservative Party has done. The notion that carbon and carbon dioxide which are basic components for life on earth (for example trees require carbon dioxide to photosynthesise) is going to kill all of us in a climate 'emergency' is for debate. The 'science' is not proven by any means and debate has been shut down, one might surmise, by, in many cases, vested interests. I would urge the council to take the opinion of the Medway residents, taxpayer and electors prior to targeting any policy towards Net Zero which can only be costly and economically damaging to individuals and businesses.

I note the repeated assertion that Medway wishes to deter car dependency. I hope that this does not translate to attempted punitive measures such as the imposition of 15 minute cities or ULEZ type costs. We have an ageing population and poor weather for eight months of the year. 'Active

travel' is a fine and laudable ideal however parents and grandparents must not be priced out of their cars by green fines nor by the removal of parking spaces in the Medway towns. These provide the life blood of customers for local agricultural, retail and leisure businesses.

I support the improvement of bus services which are extremely poor and infrequent and also improved use of the river for freight, commuters to the Medway City Estate and leisure activities. Maintenance of piers and improved river transport offerings I believe should be a strong focus to make the most of our natural resource, the river Medway.

I note the stated requirement to build 29,000 new homes. Also where the document states that only 5% of Medway land is green belt. Every effort must be made to preserve the AONB within Medway, we live in the garden of England after all which is also a reason why people visit Medway and spend money in the area. Greenfield sites, I can see some have been earmarked already, should not decimate our wildlife and biodiversity, essential for human peace and wellbeing.

There are already issues with access to doctors' surgeries so the question of amenity infrastructure must be carefully analysed, forecast and planned. Not simply for the incoming populations but to ensure the existing and original populations are not disadvantaged. And the transport to and from. I wonder if a commitment to improving the numerous potholes across Medway might be included – this would not only prevent costly damage to cars, but would support cyclist safety and reduce damage to the improved and more numerous bus fleets, assuming there is a greater focus on bus travel.

I note that the consultation document refers to 'protecting the area's natural resources and historic features'. There are wonderful historic features across Kent and the Medway towns, Rochester city centre is a case in point. Given the failure of the council to prevent the hugely inappropriate height and massing of the Bardell Wharf development that at 11 floors, stands at double the height of any of the neighbouring buildings (Corporation Street blocks stand at a low rise 6 floors), this has set a dangerous precedent. This contravened many existing plans:

- The Star Hill to Sun Pier Planning and Design Strategy document
- The Rochester Conservation Area Management Plan of 2010
- Historic England's opinions were ignored, despite being sought

The above begs the question of what is the point of these other strategy and management plans if they are to be bulldozed over? Will the Local Plan take account of these, work in tandem with them or ignore them and be a standalone document that supercedes any recommendations in these existing documents?



Generally the Local Plan consultation documents say good things and there appear to be good intentions. However to reiterate my opening comments, I would like to see a greater focus on facilitation consultation of all resident groups and a local referendum on Net Zero if this new Local Plan is to inform the development of Medway for the next few decades and this is a principal focus.

Yours faithfully,

Rosie Beattie

planning  
transport  
design  
environment  
infrastructure  
land

# **MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE**

**Mockbeggar and Lee Green Farm, Town Road,  
Rochester ME3 8EU**

CLIENT: The Brice Family



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# 1 INTRODUCTION

## 1.1 PURPOSE OF THE STATEMENT

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- 1.1.1 These representations have been prepared on behalf of the Brice Family 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 years) 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 Mockbeggar and Lee Green Farm 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

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- 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 over the last 36 years, resulting in a significant housing need, both market and affordable;
  - 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 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) requires the inclusion of strategic policies which 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

### 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 promoted (mixed-use development at Mockbeggar and Lee Green Farm) setting out the reasons why the site should be considered for an allocation;
- **Chapter 6** - Sets out the preferred spatial strategy and why this represents the most suitable and thus "Sound" option.
- **Chapter 7** - Provides additional commentary 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 COMMENTS ON THE PROPOSED VISION

---

- 2.1.1 The "Vision" for Medway encompasses broad policy principles for the future emerging Local Plan covering transport, employment, the environment, retail, waste and minerals.
- 2.1.2 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.
- 2.1.3 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. Indeed, the overarching principles for the "Vision" fails to identify housing at all (para 3.1) as forming an important component of the Plan.
- 2.1.4 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).
- 2.1.5 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.*

- 2.1.6 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.
- 2.1.7 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.*

- 2.1.8 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 7<sup>th</sup> paragraph (un-numbered) could be amended as follows:

*The Plan will seek to deliver 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 outline changes are essential to ensure the Plan is “Positively Prepared”, “Consistent with National Policy” and therefore “Sound” (NPPF, para 35)

## 2.2 SUMMARY

---

- 2.2.1 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, the Plan also fails to be positively prepared to 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 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 from 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 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, 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 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 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 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). Greenfield land must be released to aid the delivery of 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 years back in 2008/09 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 significant 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
<b>1986/87- 2021/22</b>	<b>27,407</b>	<b>35,727</b>	<b>-8,320</b>

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 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 pa, equivalent to 28,312 homes up to 2040 (circa 28,500 homes). The below section reviews 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 may not be achieved, for example, reserved matters consent 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 pa. 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 20 years. 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. Through 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 the "Urban Regeneration" spatial strategy. There is therefore a high potential for double 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 seem optimistically high, especially where this does not count towards the first five years of the 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 capacity of each category for potential housing delivery identified in the LLA.

### **Urban Regeneration Sites**

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- 4.2.13 Map one of the consultation document provides an overview of the potential sites for urban regeneration across Strood, Chatham and Rochester encompassing small medium and large sites. The urban regeneration sites make up the second largest element of the potential supply, with the potential to 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 failed to come forward, including within more economically buoyant times, because of issues of viability or technical constraints;
  - The Peel Ports site is known to have complex landownership/leasehold constraints. This is without addressing any individual site constraints such as contamination and whether redevelopment of the Site is financially

feasible. There are therefore significant concerns over its delivery which cannot be relied upon;

- Medway City Estate (promoted for mixed-use development) has complex landownership considerations. It is proposed as a strategic allocation with the potential to deliver sites. It is estimated that these site could come forwards in the 2030s towards the middle/ back end of the Plan period and into a subsequent Plan period;
- The requirement to provide BNG is likely to be a significant constraint to brownfield sites coming forward, especially smaller sites. Whilst on the face of it, many of these sites might seem ecologically sparse, they often harbour more interesting habitats, which under the DEFRA Metric 4 trading rules are very difficult to replace elsewhere. Brownfield sites are also likely to wholly rely on off-site BNG provision. This is either likely to prevent some sites from coming forward for reasons of viability (contributions for off-site provision are very high) or significantly reduce the development potential of some sites.

- 4.2.15 With the above concerns in mind, it is considered a conservative estimate that circa 3,500 dwellings of the sites within the urban regeneration category may not be deliverable in the proposed Plan period and based on previous urban regeneration delivery rates.

### *Suburban growth*

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- 4.2.16 Map two of the consultation document provides an overview of potential sites for Suburban Growth, with 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 due long-standing concerns regarding deliverability due to issues of access and landownership, resulting in lapsed consents; and
- 4.2.17 Taking the above into account, it is considered at least 3,123 homes can be discounted from the potential supply of housing.

### *Rural Development*

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- 4.2.18 The consultation document sets out that through the LAA, that potentially 14,736 homes in the rural development strategy could come forward. 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.



4.2.19 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 with regard to the Council's strategic objectives;
- The peripheral sites around the northern 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, west and north west of the settlement that have either been granted planning permission or 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. In a statement on 11 July 2023 Medway Council stated that:

*"The loss of HIF today means we cannot fund and deliver the long needed all-important roads, public transport and environmental improvements ahead of new homes being built on the Hoo Peninsula."*

Consequently, the loss of HIF funding puts into question the sustainability and deliverability of the sites in and around Hoo. Whilst there is a scale of development interest here, amongst relatively few landholders which could secure the delivery of a significant proportion of growth, the infrastructure upgrades required to deliver that development will have to be developer funded. This will require close collaboration across a consortium of landowners and developers to secure this. The commercial realities of this, are that this will require significant commercial agreements across all parties to secure infrastructure delivery likely including the need for equalisation agreements. This additional layer of complexity, notwithstanding the infrastructure constraints, 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.

- Allied to the above, in the absence of infrastructure upgrades onto the peninsula, this further undermines the delivery of any expansion to the settlements at Lower Stoke, Allhallows and the Isle of Grain, which rely on the same infrastructure upgrades.

4.2.20 It is not fully known how development on the Hoo Peninsula will be impacted by the loss of the HIF funding. However, given the outlying nature of some of the other rural settlements on the peninsula such as Cliffe, Allhallows, Lower Stoke and the Isle of Grain a conservative estimate suggests a loss of a minimum of

3,327 homes from the potential supply before discounting of sites from the Hoo expansion (previously identified in the Hoo development framework).

### *Green Belt Loss*

- 4.2.21 Just under 5% of land in Medway is designated as Green Belt. The areas of Green Belt form part of the London Metropolitan Green Belt and join land adjacent to Gravesham Borough Council and Tonbridge and Malling Borough Council. The Green Belt in Medway provides the strategic gap between Strood and Higham and between Snodland and Halling. The Council has identified the changing characteristics of the Green Belt due to the context of major infrastructure investment (the lower Thames crossing) as an opportunity for a limited number of homes in proximity to transport networks and services in Strood to be developed in the Green Belt providing new services as well as homes.
- 4.2.22 Where a site for potential Green Belt release conflicts with the five purposes of the Green Belt the site has been discounted from the supply although its contribution is limited.

## 4.3 SUMMARY

- 4.3.1 Overall, having reviewed the 447 sites identified in the LAA Stage 1 assessment, it is considered that from a potential supply of 38,216 homes, optimistically only 27,674 could be deliverable. See table 4.1 below. This is having regard to part delivery rates, known planning and infrastructure constraints, as well as considering whether the board location and scale of development proposed is suitable given the site's location. Due to the high-level nature of LAA a finer grain assessment of the suitability of the Site could not be undertaken. However, our assessment demonstrates that the potential supply as set out at para 5.16 cannot all be relied upon.

Category	Medway Potential Housing Capacity (From LAA)	DHA's view on Potential Housing Capacity (from LAA)	Difference in Supply
Urban Regeneration	11,151	7,651	3,500
Suburban Growth	9,680	6,157	3,123
Rural Development	14,736	11,229	3,147
Green Belt Loss	2,649	2,637	12
<b>Total potential supply</b>	<b>38,216</b>	<b>27,674</b>	<b>10,182</b>

TABLE 4.1 SUMMARY OF DHA ASSESSMENT OF MEDWAY'S POTENTIAL HOUSING SUPPLY

- 4.3.2 In addition, the windfall site allowance, at para 5.15 and Table 3.1 , is optimistically high, and does not accurately reflect likely windfall provision going forward, taking into account the adoption of the Local Plan, allocation of new sites and other constraints to housing numbers such as BNG.

## 5 SITE – MOCKBEGGAR AND LEE GREEN FARM

### 5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

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- 5.1.1 The proposed allocation has been promoted through Medway's previous Regulation 18 consultations and Call For Sites exercises. The largest area of site SR9 borders all of Lee Green Road to the North and Common Road to the East, and border part of Bunters Hill Road to the South and the B2000 (Town Road) to the West. A small section of the site lies to the Northwest, bordering Lee Green Road and between Town Road and Ham River Hill. The site currently comprises of roughly 27 hectares of agricultural land.
- 5.1.2 The site provides an opportunity for a mixed-use development as described in the Medway Land Availability Assessment, and therefore provides an opportunity for the following development:
- Circa 700-800 Class C3 dwellings (based on 30 dwellings per hectare)
  - Between 1-79 self-build or custom-build dwellings
  - A Class E development of a local centre, including shops and a community centre, to support the new homes
  - A new primary school depending on the need for a mixed-use development
- 5.1.3 The site could benefit from multiple vehicular access via Lee Green Road, Common Road, Bunters Hill Road, or Town Road. It is also within close proximity to Cliffe Woods (approximately 500m at its closest) and Wainscott (1.4km at its closest) and benefits from easy access to the wider road network via Town Road.
- 5.1.4 It is understood that land to the north of the site, which wasn't part of the 'call for sites' exercise is available for development. Given this, it is considered that the site could be developed in conjunction with this land, forming a sustainable expansion of Cliffe Woods to the South. However, it is not considered that this land is critical to the appropriate development of the site, which could also form its own entirely new small-scale settlement separate Cliffe Woods.
- 5.1.5 The nearest railway station is Strood roughly 2.8km away, with regular services to Rainham, Faversham, London, St Pancras International and Tonbridge amongst others.
- 5.1.6 Given the locality of the site with its proximity to Wainscott and Strood, and access to the strategic road network and mainline railway stations, the site provides an attractive opportunity for a mixed-use development of almost 800 new homes including a new neighbourhood centre with retail and other provisions such as a primary school.

## 5.2 WHY DEVELOP ON AGRICULTURAL LAND?

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- 5.2.1 The council's previous assessment considered that sites situated on the best and most versatile agricultural land (BMV) could be disputed and considered for development. Given the need for housing in Medway and the sustainable nature of site SR9 the need is considered to outweigh any current concerns over whether the site is BMV. As defined in Annex 2 of the NPPF, an Agricultural Land Classification Assessment can be carried out to determine whether the site is BMV. Whilst it is recognised that the NPPF places emphasis on the economic and other benefits of BMV, it does not stand as a barrier to development where there is a clear and overriding need for housing.
- 5.2.2 The site is considered to be deliverable in terms of availability, suitability and achievability.
- 5.2.3 Availability is the process of ensuring that a development is financially viable. We can confirm that whilst there would be no financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the plan period, the loss of HIF funding could impact development across the peninsula as a whole. Large scale residential developments are likely to have an impact on the surrounding infrastructure, and with the loss of HIF funding, will be reliant on being able to self-fund their impacts. In this particular case, given the closer relationship with the strategy transport network, it isn't considered that a development of the site would be hindered by the need for substantial upgrades to the local transport network.
- 5.2.4 Site SR9 is considered suitable for development as it would make a sizeable contribution to the required housing supply in the Medway area. The site would form a new small settlement just outside of Cliffe Woods, and is not constrained by access, infrastructure, flood risk, hazardous risks, pollution, or contamination. The land in question is therefore a logical development site in a sustainable location for residential development.
- 5.2.5 Due to the site being in a single ownership and having minimal constraints, it provides a sustainable location for housing development that can be delivered early on in the plan period.
- 5.2.6 Given the sites location to both Cliffe Wood and Strood, a residential development would be well served by existing public transport, but also has the opportunity to improve public transport in the area. Whilst the loss of HIF funding has raised concerns regarding the viability of developments in the Hoo Peninsula, and that the development would result in the loss of farmland, the need for housing is considered to outweigh these concerns. Because of this, the site is considered appropriate for development.

## 5.3 OTHER CONSIDERATIONS

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### Trees

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- 5.3.1 Trees and hedgerows lie within and around the edge of the submission site alongside the roads. None of these are subject to a Tree Preservation Order. Any future application would be accompanied by necessary Arboricultural Surveys with existing trees and hedgerows retained where possible. Therefore, this is not a development constraint.

### Public Rights of Way

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- 5.3.2 There are no public rights of way across the site, so therefore development will not be constrained by this. However, there are public rights of way within the surrounding area, which would provide opportunities for the public. Furthermore, development of the site would allow pedestrian permeability to further aid the use of more sustainable forms of transport.

### Flood Risk

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- 5.3.3 The site lies entirely within Flood Zone 1 and therefore is not at risk of any flooding.

### Contamination

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- 5.3.4 The site is not considered to have a likely presence for contamination and would therefore not constrain development.

### Archaeology and Heritage

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- 5.3.5 Whilst there is a grade II listed building to the West of the site, it is not considered close enough that the development would have an impact on it. The site is not known to have a presence of archaeology, however mitigation measures can be addressed if required.

### Noise and Air Quality

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- 5.3.6 The site is not within an Air Quality Management Area and is therefore not considered as a constraint. Any noise or air quality related constraints can be addressed during the planning process of the development.

## 6 PREFERRED SPATIAL STRATEGY

### 6.1 PREFERRED SPATIAL STRATEGY

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- 6.1.1 As is evident from Table 1 of the consultation document that 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 "Rural Development". In identifying our preferred option, we have also considered the pros and cons of the other development options.

#### Option 1 - Urban Regeneration

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- 6.1.2 This focuses on urban sites within Chatham, Strood and Rochester in and around the individual towns, high streets or on the waterfront of the River Medway.
- 6.1.3 For the reasons section under section 4, significant concerns are raised regarding the deliverability of many of these sites. In general, we do not raise an objection to the redevelopment of brownfield sites. However, these cannot form a significant component of the housing land supply, especially within the first 5 years because of the complexities involved with such sites coming forward.

#### Option 2 - Suburban Expansion

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- 6.1.4 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 a sensible and sustainable extensions.
- 6.1.5 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, unlikely to be constrained by issues of viability, such as sites under Option 1.

#### Option 3 - Rural Development

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- 6.1.6 Focuses development to the north of the administrative area on the Hoo Peninsula. For the reasons identified under Section 4. There are significant concerns over the deliverability and reliability of substantial development coming forward under this spatial option. Whilst it might be suitable allocated smaller sites to meet local housing needs, this spatial strategy cannot be relied upon to deliver the housing numbers purported in Table 1 of the consultation document.



6.1.7 The Mockbeggar and Lee Green Farm site is south of Cliffe Woods and has a current agricultural land use (with small farm shop and café) classifying it as rural development. Whilst the need for Best and Most Versatile Agricultural Land is considered important, it does not outweigh the concerns regarding housing delivery and supply.

6.1.8 Paragraph 175 discusses the importance of allocating 'land with the least environmental or amenity value, where consistent with other policies in this framework.' Within the footnote of this page, it states that:

*'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.'*

6.1.9 Section 5 above sets out how the site SR9 is a suitable location for a logical and sustainable residential development due to its proximity to existing transport links. It would also provide a large number of housing which would significantly contribute to the total homes (and affordable homes) required by Medway. The site is viable and can be delivered within the beginning of the plan period due to the lack of constraints on site.

6.1.10 Therefore, Option 3 should be part of a rounded approach from Medway to deliver quality housing in sustainable locations in order to meet the needs of its population. The deliverability of homes across the Rural, Suburban, Urban and Green Belt locations will ultimately help to facilitate these needs and achieve the 'Vision' of the Local Plan previously mentioned in Section 3.

#### **Option 4 - Green Belt Release**

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6.1.11 These are shown as sites adjacent to the administrative areas of Gravesham Borough Council that are adjacent to the settlement of Strood and in the strategic gap between Halling (Medway Council) and Snodland (Tonbridge and Malling Borough Council) adjacent to where each neighbouring Council are proposing urban extension or standalone new settlements to meet their housing need.

6.1.12 The need for Green Belt release only forms a small part of the potential supply and should not be relied upon to fully meet the housing need.

## **6.2 SUMMARY**

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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. This includes Rural Development proposals such as on site SR9.

## 7 CONCLUSIONS

### 7.1 OVERALL SUMMARY

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- 7.1.1 This representation has been prepared on behalf of the Brice Family in response to the Medway Council Draft Local Plan Consultation.
- 7.1.2 The purpose of this representation is to provide comment on the Council's proposed development strategy and specific proposals for allocated sites within the plan.
- 7.1.3 In this respect, we commend the Council for aspiring to meet their housing need in full and consider that a dispersed growth strategy represents the optimum means to achieve this. Further, we support the inclusion of our client's land at SR9 as a residential and mixed-use allocation, subject to the comments in this document.
- 7.1.4 Notwithstanding our in-principle support, we consider that the Local Plan strategy relies heavily on the delivery of strategic sites across all options of development, and the rural development option could require the provision of supporting infrastructure. Moreover, the Council have applied overly optimistic projections to the delivery of housing within all categories.
- 7.1.5 It should be noted that we have no in principle objection to the allocation of strategic sites of this nature. Accordingly, we would stress the importance of making efficient use of proposed site allocations to ensure that enough housing is brought forward early in the plan period. Likewise, additional sites are available within the borough that are suitable for development.
- 7.1.6 For these reasons, there is an opportunity to allocate land at site SR9 to deliver up to 800 new homes (subject to further detailed review), as well as delivering a local centre for shops and a community centre, with the possibility of a primary school.
- 7.1.7 I trust the contents of this representation are clear and I hope the comments are useful in guiding the forthcoming stage of the plan making process.

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environment  
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# **MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE**

**Waterside Court, Medway City Estate**

**LAA SITE REF: SR40  
CALL FOR SITES FORM SUBMISSION ID: 256  
CALL FOR SITES RESPONDENT ID: 414  
REGULATION 18 CONSULTATION ID: ID: 1364  
CLIENT: KEVIN RICE**

OCTOBER 2023  
DHA 32341



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### 3. Vision

#### Para 3.1 Vision for Medway in 2040

*The plan's vision is to establish Medway as a leading regional city, connected to its surrounding coast and countryside; with a thriving economy, where residents enjoy a good quality of life and there is a clear strategy for addressing climate change and strengthening natural assets.*

**Comments:** Contrary to the requirements of the NPPF (para 15), the "Vision" fails to identify the provision of housing and employment 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 in relation to housing and new employment, the Plan also fails to be positively prepared to provide a suitable framework for addressing housing and employment needs. The "Vision" must be amended at para 3.1 to reference housing and employment provisions and the supporting text amended to include a reference to the delivery of 28,312 new homes.

### 4. Strategic Objectives

- **Prepared for a sustainable and green future.**
  - 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', and reduce the risk of flooding; promoting the use of nature-based solutions to climate change; seeking to protect the most vulnerable groups from the impacts of climate change; and supporting major shifts in modes of transport used to reduce carbon impacts.
  - 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.
  - To ensure the effective management of natural resources, including water and soil, and improving air quality, providing for the sustainable supply of

minerals and minimising the production of waste, enabling it to be managed as far up the Waste Hierarchy as possible.

**Comments:** 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. 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).

- **Supporting people to lead healthy lives and strengthening our communities.**

- To provide for high quality energy efficient homes that meet the housing needs of Medway's communities, reflecting the range of sizes, types and affordability the area needs, including provision for specialist housing, such as for people with disabilities, gypsy and traveller accommodation, the elderly including those wanting to down size, students, first homes, and custom and self-build housing; and drive reductions in the carbon impacts of housing in new developments and securing opportunities for retro-fitting older properties.
- 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.
- To strengthen the role of Medway's urban, neighbourhood and village centres, responding with a positive strategy to changes in retail; supporting independent retail and start-ups, encouraging new business uses into the High Street; securing a range of accessible services and facilities for local communities close to where they live; and realising opportunities for homes and jobs, with the main Town and larger village Centres providing a focus for new retail and community facilities and cultural activities, within the context of the distinct towns, neighbourhoods and villages that make up Medway.

**Comments:** 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, 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 per annum).

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).

- **Securing jobs and developing skills for a competitive economy**

- To boost the performance of the local economy by supporting local businesses to grow and innovate; and attracting inward investment and re-locations, through the provision of a portfolio of good quality employment land that meets the needs of businesses; and to secure and extend higher value employment opportunities; and reduce out-commuting.
- Build on existing strengths and expertise, such as engineering, energy and creative industries, and raise the profile of key sectors, to attract and develop the jobs of the future.
- To significantly improve the skills of the local workforce and capitalise upon the benefits to local businesses; and improve graduate retention.
- 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.
- To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services.
- To support growth in tourism, cultural and creative industries, extending the offer to include green tourism and city breaks, including realising opportunities in the domestic tourism market.

**Comments:** With regards to the spatial objectives more generally, the general principles are supported. However, they further highlight the need for the amount of development (housing and employment) to be planned must be expressed as an objective, since many of the other objectives are dependent 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.

- **Boost pride in Medway through quality and resilient development**

- To ensure that development is supported by the timely provision of good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served.
- To deliver sustainable development, meeting the needs of Medway's communities, respecting the natural and historic environment, and directing growth to the most suitable locations that can enhance Medway's economic, social and environmental characteristics.
- To secure the ongoing benefits of Medway's regeneration, making the best use of brownfield land, and bringing forward the transformation of the waterfront and town centre sites for high-quality mixed-use development, and a focus for cultural activities.
- To lift the standards of sustainability and quality in all new development; respond positively to the character and variation of local places across Medway; seek opportunities for greener construction, to provide for more energy-efficient buildings which drives down their carbon impact; demonstrate distinctiveness; and improve the accessibility and design of the public realm that will help people to live healthier lives and open up travel choices, reducing car dependency.

**Comments:** The objectives also talk about development on brownfield land as part of the ongoing benefits of Medway's regeneration. This is supported in NPPF (para 119) which sets out "a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land". Whilst this is supported it is also understood that the objectives do not directly address the need to release brownfield land for urban regeneration as part of a combined strategy for meeting the housing needs of Medway which also includes suburban expansion, rural development and Green Belt release. The objective is, therefore, misleading appearing to read that urban regeneration is the only objective rather than part of a wider objective for Medway to meet housing needs through the emerging Local Plan.

## Summary

The strategic objectives as currently drafted do not provide a "Sound" basis to inform the development strategy, site selection or future planning policies, 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 with respect to 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). The proposed brownfield sites must be allocated, and the Council be willing to take a proactive approach including identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs on brownfield sites. Urban Regeneration will not meet the objectively assessed need on its



own. Therefore, it is also acknowledged that there will need to be Greenfield development if the Council are to realise the delivery of their housing need.

## 5. Developing a Spatial Strategy

### **Development needs**

5.1 The Local Plan will include a Policies Map, which will show how land is allocated for new development, such as housing and employment, and where land is protected, such as environmental designations for nature and landscape. The Policies Map and Key Diagram help to communicate Medway's spatial strategy – how we are planning for the future.

**Comments:** The consultation document (para 5.3) sets out the development needs of Medway, identifying a current housing need of 1,667 homes per annum (pa) or circa 28,500 over the Plan period (2022-2040). Paragraph 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.

5.2 A Local Plan should be positively prepared for sustainable development. It should not be used to stop development that is needed for our growing and changing communities. The Plan should seek to direct and manage growth, so that it provides land for homes, jobs and services, as well as protecting the area's natural resources and historic features.

**Comments:** As a minimum, the objective to meet the objectively assessed need in full is supported, as required by National policy, 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 (up to 2,000 homes), to ensure the Plan is "Positively Prepared" (NPPF, para 35).

5.3 Government directs Local Planning Authorities to use its 'Standard Method' in determining the scale of housing needed over the plan period. This Standard Method formula for Local Housing Need identifies a need for 1,667 homes a year in Medway, or around 28,500 over the plan period to 2040. This level of housing need is greatly higher than rates of housebuilding seen in Medway for over 30 years. The formula reflects dated demographic projections and has been heavily criticised across the country and there is currently some uncertainty with Government policy. At the time of writing, the Government had not yet published its response to the consultation on revisions to the National Planning Policy Framework, which included consideration of the Standard Method formula.

**Comments:** 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).

5.4 The Council has raised concerns in Government consultations about the Standard Method. A key matter for Medway is the marked variation in levels of housing needs generated by the Standard Method based on projections from 2014, in comparison to use

of more recent demographic projections for Medway's growth. This matter was considered in the Medway Housing and Demographics report supporting the Local Housing Needs Assessment published in 2021, and is illustrated in Figure 1 below, which is an extract from the report. The dwelling-led Standard Method scenario is clearly significantly higher than use of other approaches to forecasts. The Government considers that this method is appropriate to meet its housebuilding ambitions to tackle pressures in the housing market. Notwithstanding the concerns regarding the methodology, it has to be recognised that there is a housing crisis, particularly regarding affordability and there is an absolute need to provide the right homes in the right places to meet Medway's growing needs and the requirements for those desperately needing a good quality home. There are many existing residents in Medway living in overcrowded and/or substandard conditions which is unhealthy or living at home with parents well into their late 30's because they simply cannot afford to live independently in the area they wish to continue to live.

**Comments:** The Council has consistently failed to deliver against its housing requirement since 1986, with its last meeting its requirement in only two years back in 2008/09 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).

5.5 The Council will be reviewing the outcomes of Government consultations and anticipated policy updates in preparing the draft Local Plan for publication next year.

**Comments:** This noted and there are no other comments to make on this matter.

5.6 The Council is collating a comprehensive evidence base to inform the new Plan. All potential sites will be assessed for their ability to deliver sustainable development, considering constraints and mitigations, and how they could meet the objectives of the Sustainability Appraisal and objectives for the Plan. The Council needs to demonstrate that the growth strategy set out in the Plan can be delivered, to provide certainty and confidence in Medway's growth. Potential sites and locations will be tested against a range of criteria, including transport impacts and viability.

**Comments:** This evidence base is still being written. The Regulation 18 Local Plan still relies on evidence spaces such as the ENLA (2015 and the Housing Needs assessment 2021. The evidence base for the local plan needs updating to reflect current circumstances within Medway to allow to be positively prepared the needs of the area.

5.7 Work to date has highlighted some critical constraints. National Highways has indicated that there is insufficient capacity in parts of the Strategic Road Network to accommodate significant growth. National Highways has identified capacity and safety concerns with M2 Junction 1. Although this is outside of Medway's boundary, it is a key junction for the area, and many residents and workers travel through this junction regularly. There are no plans to upgrade this junction as part of National Highway's plans for the Lower Thames Crossing (LTC). Without a clear scheme in place to address these issues, development of jobs and homes across north and mid-Kent will be stymied. The Council is working with neighbouring authorities and wider stakeholders to prioritise action on M2 Junction 1. This matter would

need to be addressed in the Local Plan, with policies showing how impacts could be mitigated and improvements delivered.

**Comments:** see comments under paragraph 5.9

5.8 In addition to this current issue, further transport impacts are expected with the development of the LTC. The LTC is focused on a defined scheme for its primary route and tunnel. The scheme does not provide for improvements that may be needed to parts of the surrounding roads network that would be impacted as a result of the new crossing. The new crossing is forecast to generate new trips, as well as re-routing existing journeys, as drivers divert from Dartford.

**Comments:** see comments under paragraph 5.9

5.9 This is a particular concern for Medway, as the modelling assumptions used in planning for the LTC underestimate the amount of development growth that would be expected in the new Local Plan. There are concerns that the road network will not have the capacity to accommodate the higher levels of homes and jobs planned in Medway. This raises uncertainty for the capacity of the highway network to meet the full scale of development needs over the plan period. This could be a strategic constraint to development and the Plan would need to reflect lower levels of growth in Medway, with the consequent impact on delivery of new jobs and homes to Medway's need and related affordability of homes.

**Comments:** Medway Council lost its Housing Infrastructure Funding (HIF) of £170 million in July 2023 to deliver the residential and employment expansion of Hoo. the loss of HIF funding puts into question the sustainability and deliverability of the sites in and around Hoo. Whilst there is a scale of development interest here, amongst relatively few landholders which could secure the delivery of a significant proportion of growth, the infrastructure upgrades required to deliver that development will have to be developer funded. This will require close collaboration across a consortium of landowners and developers to secure this. The commercial realities of this, are that this will require significant commercial agreements across all parties to secure infrastructure delivery likely including the need for equalisation agreements. This additional layer of complexity, notwithstanding the infrastructure constraints, 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.

5.10 Further consideration will be given to potential impacts on the environment, especially the designated habitats and landscapes which form a large part of Medway's area, and strategic infrastructure needs. The Council will need to assess how negative impacts can be avoided, or mitigated, such as through delivery of new services.

**Comments:** This will need to be demonstrated through the updated evidence base the council provides to support the local plan moving forward. At this time, it is something that cannot be commented upon as we don't know what the evidence/considerations are to date.

5.11 In addition to assessing how to meet Medway's needs for 28,500 new homes over the Plan period, the Council must consider if there is capacity to provide up to an additional

2,000 homes to help meet Gravesham's housing needs, following a request from the neighbouring borough.

**Comments:** The 2,000 homes to assist Gravesham Borough Council meeting its housing need should be accommodated given this additional need, it is even more pressing 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).

### **Potential land supply for development**

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

**Comments:** A pipeline supply includes 2,061 homes under construction as of 31 March 2023 is identified. It is difficult to determine whether the pipeline supply is reliable. We have concerns over double counting on several of the sites shown in Appendix C and D of 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.

5.13 There is an existing 'pipeline' of sites with planning permission for over 7,500 homes, not yet built, which contribute towards meeting the total need in the Plan. Authorities can also make allowance for 'windfall sites' – those that come forward for development outside of Local Plan allocations. Taking account of these two sources of supply, the Council is assessing options to make provision for site allocations for over 19,000 homes to meet needs in Medway.

**Comments:** The Council can refer to historic windfall delivery (para 71 of the NPPF). However, the Council has not had an up-to-date Local Plan for 20yrs. Most housing sites have therefore, come forward are not allocation and are therefore windfall sites. This significantly distorts the windfall delivery rate.

The 3,000 dwellings proposed for windfall allowance therefore seem optimistically high. In the absence of any detailed evidence, it is considered that the Council does 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.

5.14 This is a high level of need, and the Council has carried out a comprehensive and iterative review of potential sources of land for development allocations. The Council has produced a Land Availability Assessment (LAA) to be published with this consultation document. The LAA has been informed by a Call for Sites, where the Council invited developers, landowners and other parties to put forward sites for consideration as potential

development allocations. Planning officers also identified sites from other sources, such as development briefs, the Brownfield Land Register and withdrawn planning applications. An initial high-level assessment has screened out sites that are too small. Further work will consider the scope for overcoming constraints to achieve sustainable development.

**Comments:** See comments in section 5.15

5.15 The LAA has identified land with the potential capacity for c 38,200 homes, which will proceed to the next stage of detailed assessment, along with the Sustainability Appraisal process. Many of these sites are subject to constraints, including environmental considerations, infrastructure requirements and viability. It is likely that many of these sites will not be found suitable, available and achievable for sustainable development and will be removed at the next stage of assessment and Sustainability Appraisal. A range of mitigation measures will be required to achieve the scale of housing needed for the Plan. The scale of proposed growth is anticipated to have significant impacts across Medway. This level of housebuilding would mean the transformation of urban centre and waterfront areas and large-scale development in suburban and rural areas.

**Comments:** Having reviewed the 447 sites identified in the LAA Stage 1 assessment, it is considered that from a potential supply of 38,216 homes, optimistically only 27,674 could be deliverable. This is having regard to part delivery rates, known planning and infrastructure constraints, as well as considering whether the board location and scale of development proposed is suitable given the site's location. Due to the high-level nature of LAA a finer-grain assessment of the suitability of the sites could not be undertaken. However, our assessment demonstrates that the potential supply as set out at para 5.16 cannot all be relied upon.

5.16 The Council has identified four broad categories of locations where development could take place, reflecting Medway's geography. Indicative housing capacities from the LAA for the different areas are presented for each category (Note, this is NOT allocating numbers to allocated sites but merely reflects the LAA)

**Comments:** Having reviewed the 447 sites identified in the LAA Stage 1 assessment, it is considered that from a potential supply of 38,216 homes, optimistically only 27,674 could be deliverable. This is having regard to part delivery rates, known planning and infrastructure constraints, as well as considering whether the board location and scale of development proposed is suitable given the site's location. Due to the high-level nature of LAA a finer-grain assessment of the suitability of the sites could not be undertaken. However, our assessment demonstrates that the potential supply as set out at para 5.16 cannot all be relied upon.

5.17 These broad locations are considered in more detail below.

**Comments:** 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, the preferred development option is "a mixed approach of the 4 residential development options" allowing for urban regeneration sites

to deliver sustainable communities. In identifying our preferred option, we have also considered the pros and cons of the other development options.

## Urban Regeneration

5.18 Medway has been successful in transforming its urban waterfront and centres in recent decades, with areas such as St Mary's Island, Chatham Waters, Victory Pier and Rochester Riverside. The Council has been leading on Medway's regeneration, setting out strategies to realise new opportunities, securing millions in external funding, preparing land for redevelopment, and working closely with partners and developers to deliver change. The Council is also identifying where it has underused sites that could make better use of brownfield land for new development and is bringing forward new homes and business space in areas such as Chatham Waterfront. This commitment to urban regeneration continues to form an intrinsic part of our strategy for Medway's growth in coming years.

**Comments:** We agree that the council should make the best use of underutilised brow sites in urban areas. This approach accords with which sets out "a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land", but this is not reflected in the Vision and spatial objectives of the Local Plan. However, the development option only delivers a proportion of the homes required to meet the need of Medway. Therefore, a combination of all the residential development option is required to meet the needs.

5.19 The new Local Plan will draw on the existing policies, strategies and programmes that promote the regeneration of Medway's urban centres and waterfront. This work creates a supportive policy environment for redevelopment in these areas. In drawing up the growth strategy for the new Plan, the Council's starting point is regeneration and making the best use of vacant or under-utilised brownfield land. Sites which are already identified in Council documents such as the town centre masterplans for Chatham, Gillingham and Strood, and development briefs for Strood Waterfront, are likely to be included as site allocations in the new Local Plan. Such sites could deliver thousands of homes, as well as commercial floorspace for businesses and services and contribute to our wider strategies for supporting our high streets and centres in adapting to wider changes in retail patterns.

**Comments:** We have concerns regarding the deliverability of some of some sites identified in the LAA on the basis:

- The development potential of many of the sites has been known about for some time, but they have failed to come forward, including within more economically buoyant times, because of issues of viability or technical constraints and ownership issues i.e. The Peel Ports site
- The requirement to provide 10% BNG, especially smaller sites.

It is a conservative estimate that circa 3,500 dwellings of urban regeneration sites identified may not be deliverable in the proposed Plan period.



5.20 The regeneration opportunities vary across Medway's urban area, reflecting the different characteristics of our towns. Some sites offer the potential for taller buildings and a modern urban character; other sites are more sensitive to the historic surroundings and their environmental setting. The Council recognises the distinctive and varied character of Medway. Urban regeneration does not mean a standard approach to density and design, but consideration of the most appropriate approach in different areas. The Council's work on the Chatham Design Code is assessing in detail how new development would best fit with the centre's heritage, landscape and infrastructure. It will provide guidance on building heights and massing, design of public spaces and transport links to ensure that redevelopment in central Chatham optimises the potential of the area. Similarly, the Chatham Intra Development Framework takes a heritage-led approach to managing potential change, reflecting the area's special character and historic significance. If such areas are to provide new homes, workspaces and services, it is critical that people and the environment are at the centre of plans – with green spaces, sustainable design, play areas, and places to rest and socialise. The Plan must promote a coherent strategy that looks at managing change to create an attractive and sustainable place for people to live, work and visit.

**Comments:** The Council should consider a masterplan/ development framework document, similar to the drafts produced for the Strood, Chatham and Gillingham Town Centres for the Medway City estate. This would create a structure under which individual proposals would proceed and a method for delivering the multiple sites identified on the Estate currently and opportunities to develop the peninsula into a sustainable community.

5.21 In addition to these sites, the Council is also considering the potential for wider development in urban waterfronts. Land has been promoted for redevelopment at Chatham Docks and Medway City Estate. These large sites could provide for new homes as well as workspace for businesses and services. Such major redevelopment would have a marked impact on the area and would involve the relocation of existing businesses.

**Comments:** The redevelopment of the Medway City Estate is welcomed. It was acknowledged in the Employment Land Needs Assessment (ELNA) (December 2015), compromised by poor quality public realm and fragmented land ownership pattern, with limited capacity for intensification and expansion. Peak hour traffic issues and road parking and a poor image for office-based occupiers with little room for expansion or intensification of uses. The opportunity to redevelop Site Ref SR40 and the Medway City estate would provide a betterment to the character of the area whilst providing a sustainable neighbourhood/community in a sustainable location in the heart of Medway.

#### Opportunities

5.22 The central urban areas benefit from good public transport links, existing services and businesses, universities and colleges and major visitor attractions. These offer sustainable locations for new development, in line with national planning policy. There are underused and vacant sites, reflecting changes in work and retail patterns over a number of years. These locations have the potential for higher density development, making the best use of previously developed land. The accessibility of town centre sites can offer attractive living environments for a wider range of people. Town centre regeneration is not limited to flats



for younger people but has the potential to meet the needs of older people and families. The plan will need to reflect the needs of wider communities in shaping policies and allocations for central areas.

**Comments:** Site Ref SR40 has the capacity to deliver circa 200 residential units in an area where there are existing employment opportunities within a sustainable location on a brownfield/ previously developed site circa 1.5km from Strood train station and 2km from Strood High Street. It is envisaged that due to the brownfield delivery rates site could come forward from the middle of the plan period in the 20230's.

Development Identified in the Council's pipeline at Annex D of the LAA close to the entrance to the Medway City Estate could enhance the sustainability of the sites for residential development on the Medway City Estate through the plan period.

With concerns over the development of the peripheral sites in the rural development spatial strategy on the northern edge of Cliffe Woods within this plan period given the existing pipeline of development to the south, west, and northwest of the settlement combined with the concerns over the future of residential or mixed-use development on the Hoo Peninsula given Medway's loss of HIF funding in July 2023 to deliver the expansion of Hoo puts into question the sustainability and deliverability of the sites in and around Hoo. Therefore, alternative sites such as site ref SR40 need to be preferred over rural development sites which are less suitable for development.

The Waterside Court Site is within the Medway City Estate as set out above the development of Medway City Estate is welcomed and should be allocated along with a development framework. The NPPF makes clear the importance of economic development and the role of existing employment sites in supporting the economy and in that respect the Medway City Estate has performed an important role throughout its development and continued operation. At the same time the NPPF acknowledges that planning policies and decisions need to reflect changes in the demand for land, and it is therefore considered appropriate to review through the preparation of a new Local Plan how the Medway City Estate can evolve and function in a way which continues to contribute as effectively as possible to the Medway Towns.

5.23 Vacant units on the High Street could be redeveloped with space for businesses and community services on the ground floor, with new homes on higher floors. As businesses, particularly office- based activities, look at new models of working, town centre sites could have an important role in diversifying our employment land offer.

**Comments:** This strategy cannot be relied upon and will only deliver a small number of units in an urban area compared to wholesale redevelopment of brownfield sites.

#### Issues and Constraints

5.24 The continued success of urban regeneration in Medway will involve directing new homes to locations where every day needs can be met; these locations are already – or could be – well-served by public transport for medium and long-distance journeys. If we do not achieve meaningful shifts in how people travel, the centres and surrounding roads

will be subject to further congestion, with associated air quality and amenity issues, and development will be constrained by levels of car parking.

**Comments:** The landowners of Site Ref SR40 buy into the Vision Document by Assael to redevelop the Medway City Estate into a mixed-use sustainable community with residential and employment uses. The Vision seeks to provide greater connections to Rochester, Strood, and Chatham by bike, food, and other sustainable modes of Transport. To help achieve the Wider vision of the development of Medway City Estate and particularly Site Ref SR40 the Medway City Estate would benefit from a Council or developer-led development framework setting out the vision and masterplan for the peninsula which includes the promotion and delivery of sustainable transport.

5.25 The waterfront is an important area for nature and much of the river in central Medway is a designated Marine Conservation Zone. This means that the impacts of development, such as light, noise, and other disturbances on the river may need to be considered. As a coastal authority, Medway is also subject to the impacts of rising sea levels with climate change. This is a particular consideration in planning for the redevelopment of waterfront sites, and the need to futureproof buildings. Much of Medway's noted heritage is located in the central urban areas, such as the Chatham Historic Dockyard and its defences, and Rochester Castle and Cathedral. New development must be sensitive to the historic significance of its surroundings.

**Comments:** This is noted and why the site SR40 should be allocated as part of a development framework/masterplan which can take into account the heritage considerations and conservation area that are at the waterfront sites across the Medway Towns.

5.26 Sites considered in this development involve the redevelopment of brownfield sites, sometimes with demolition, conversion or land decontamination required. Development of such sites tends to have higher costs for these reasons, and this can affect viability, meaning that the sites are not attractive to the market, or lower quality schemes are built. The Council is testing the viability of sites through its work on the Local Plan and will consider how policy can encourage redevelopment in these areas. Some sites identified for potential allocations in the new Plan have not been proposed by landowners or developers, but from the Council's work in assessing land availability and development briefs. The Council will seek to engage with the development sector to encourage them to consider promoting their sites.

**Comments:** We have concerns regarding the deliverability of some of some sites identified in the LAA on the basis:

- The development potential of many of the sites has been known about for some time, but they have failed to come forward, including within more economically buoyant times, because of issues of viability or technical constraints and ownership issues i.e. The Peel Ports site
- The requirement to provide 10% BNG, especially smaller sites.

It is a conservative estimate that circa 3,500 dwellings of urban regeneration sites identified may not be deliverable in the proposed Plan period.

5.27 There are key opportunities for urban regeneration and potential for thousands of new homes. It will be important to ensure that homes are supported by services, including new schools and health facilities. Planning for major redevelopment must be for sustainable development.

**Comments:** See response to section 5.24

5.28 There are sites promoted for development in urban areas which would involve significant changes to employment land at Chatham Docks and Medway City Estate. These raise issues on the possible re-location of existing businesses, as well as the types of new businesses that may be attracted to the areas. Conflict with surrounding land uses is also a key matter, particularly where residential areas may be coming forward next to busy employment sites. A strategic and comprehensive approach is critical to avoid piecemeal development that may not provide good living standards and could create tension with surrounding land uses.

**Comments:** The promoted site in this representation SR40 is within the Medway City Estate and seeks an allocation for 102 other sites such as SR 31,34 and 37 are also shown in the LAA for a combined 850 units. It is understood that the occupiers of the other sites are seeking to look for alternative sites in Medway to relocate to. Whilst the Employment Land Needs Assessment (December 2015) set out that the estate had a fragmented land ownership pattern it also set out that there was limited capacity for intensification and expansion or intensification of uses. The Medway City Estate has performed an important role throughout its development and continued operation. At the same time, the NPPF acknowledges that planning policies and decisions need to reflect changes in the demand for land, and it is therefore considered appropriate to review through the preparation of a new Local Plan how the Medway City Estate can evolve and function in a way which continues to contribute as effectively as possible to the Medway Towns. Therefore, the opportunity for the regeneration of the estate into a mixed-use sustainable community as shown in the Vision Document by Assael in the supporting representation shows how this vision could/should be brought forward. However, it would involve buy-in from both the Council and other landowners to resolve the land ownership to achieve the overall long-term strategy for the Medway City Estate.

## **Employment Sites**

### Opportunities

5.57 A number of sites are being considered through the Land Availability Assessment for employment allocations in the new Local Plan. These include the strategic sites at Grain and Kingsnorth on the Hoo Peninsula, with unique opportunities in specialist sectors, such as energy and green technology, and making use of wharfage facilities.

**Comments:**

The consideration of sites at London Medway Commercial Park and Kingsnorth on the Hoo Peninsula provides opportunities for businesses on the Medway City Estate to move to bespoke facilities freeing up brownfield sites on the Medway City Estate to allow for residential and mixed-use development.

## **REPRESENTATION MADE ON BEHALF OF KINGFISHER ACCESS LTD - REGULATION 18 CONSULTATION**

### **CLIENT: KINGFISHER ACCESS LTD**

### **ID: 1387**

#### Vision (Paragraph 3.1)

While Medway may be defined by its river and estuaries, we are concerned with the lack of representation offered in the local plan to those who live on houseboats. Medway has a duty under the Housing Planning Act 1985 (amended 2016) to have regard to those who live on houseboats.

Living on houseboats is a traditional and historic way of living, and a way to increase the vibrancy and accessibility of the river is to provide adequate mooring spaces in central locations.

Section 2.3 states The Plan will consider the diverse communities who make up Medway. Policies for housing, employment, transport, services and community facilities, retail and design need to take account of the needs of different sectors of the community. There are at least eight residential mooring sites between Hoo and Halling, several of which have a large number of houseboats permanently moored with residents who pay council tax, attend schools and colleges, Doctors surgeries, as well as spend money in the local towns and villages. We believe the plan should include reference to this diverse community to help meet the needs of all Medway residents.

#### Sustainable future (Paragraph 4.2)

In current times people are looking for cheaper ways of living, and to many, living on a houseboat is a way to achieve this. It is also a potentially more sustainable way to live. The Council should look to prioritise making suitable spaces available, and this should be integrated within the spatial strategy.

#### Healthy lives (Paragraph 4.2)

As experience tells us, those that live on houseboats have significantly less rights in terms of renting and are often at the mercy of the harbour/marina owners.

It is suggested that to strengthen the living positions of those living on houseboats, the Council prioritises making their own adequate provision.

#### Pride in Medway (Paragraph 4.2)

We note the efforts to transform the waterfront, and it is considered that increasing living communities on the waterfront with secure tenancy rights could drastically transform these areas. It is considered that by extending existing wharves, this would also build on the historic legacy within Medway.

#### Development needs (Paragraph 5.2)

Item 5.2 states a Local Plan should be positively prepared for sustainable development. It should not be used to stop development that is needed for our growing and changing communities. We consider the spatial strategy should include reference to space available for people living in houseboats.

The waterfront, particularly adjacent to urban areas, provide an exciting opportunity to bring these areas to life and active use. If a priority is given to utilising existing wharves, this can reduce the amount of required development.

#### Potential land supply for development (Paragraph 5.12)

As already stated, the Council have a duty to considering the needs of those living on houseboats, and it is considered that these people should be given suitable consideration within the local plan. The Council should look to prioritise making suitable spaces available, and this should be integrated within the spatial strategy.

We would request that an up to date assessment is carried out, understanding the number of spaces available, the nature of these spaces (size, tenure availability), in addition to the demand requirement.

**END**

# Medway Local Plan 2022-2040: Regulation 18 Consultation

Representations by Richborough Estates

Site SR17 - Land off Lower Rochester Road,  
Wainscott

October 2023



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**Contact**

Mike O'Brien

**Client**

Richborough Estates

**Our reference**

PP0060

October 2023

# 1. Vision for Medway in 2040

The Council's Vision, whilst comprehensive, is overly long, and fails to adequately communicate the Vision for the delivery of new homes over the Plan Period.

The only reference to homes or housing within the Vision relate to sustainable methods of construction or retrofitting existing buildings, as well as making provision for custom and self-build homes. Whilst these are important technical matters, the critical strategic issue of delivering the number of homes to meet housing needs in full has been ignored.

Paragraph 11a of the NPPF is clear that plans should *"promote a sustainable pattern of development that seeks to: meet the development needs of their area"* and 11b states that *"strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas"*.

Paragraph 60 of the NPPF also requires that *"a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed"*.

Richborough is therefore of the view that the 'Vision' should be altered to acknowledge the need to meet development needs in full, particularly for housing.

In the 19 years since the Medway Local Plan was adopted in 2003, completions have only exceeded the housing requirement figure that was in place at the time in only three years, and the three most recent monitoring years have seen the highest deficits. A Vision Document was submitted by Richborough during the 2023 Call for Sites consultation which included a section titled 'Historic Housing Delivery'. This identifies that the cumulative under supply of housing since 2003 is 4,955 dwellings. This lower level of delivery has only exacerbated issues in regard to affordability through the lack of supply and lower levels of affordable housing delivery.

In respect of affordable housing completions, the annual need figure has not been met once since 2006 (the highest year was in 2008 and still saw a deficit of 305 dwellings) and the cumulative deficit in affordable housing over the 19 year period (2003-2021) is 10,012. This figure is also evidenced in the Vision Document submitted on behalf of Richborough in February 2023.

There is evidence of the negative social impact of the failure to deliver sufficient housing in Medway, with the house price to income ratio in the Borough deteriorating from 5.73 in 2014 to 8.65 in 2022 (House price to residence-based earnings ratio, ONS (2023)). The under-delivery of housing has contributed to worsening affordability in the Borough. Affordability is a critical social component of sustainable development that acts as a barrier to local people being able to access housing. The research paper published by LPDF titled 'The Housing Emergency', highlights that 1 in 5 adults regard housing issues as negatively impacting their mental health, according to another paper prepared by Shelter in 2017, titled 'The impact of housing problems on mental health'. It should be accepted that there is an urgent need to boost housing delivery within Medway.

A step change in both delivery and approach is required if housing needs are to be met going forward. This requires the spatial vision for the new Plan to evolve and acknowledge where the lack of an up to date Local Plan has failed.

## 2. Strategic Objectives

### **Objective 2 - “Supporting people to lead healthy lives and strengthening our communities”**

Similar to the Vision, the Objectives also fail to include reference to the strategic requirement to meet local housing needs. Objective 2 refers to homes and meeting the housing needs of Medway’s communities. Richborough is of the view that the text should be altered to acknowledge the need to meet the development needs in full, rather than limiting this to meeting the needs of existing communities. Richborough is also of the view that the requirement to meet housing needs should be the subject of a standalone objective.

Paragraph 60 of the NPPF not only establishes that housing needs should be met but also sets out the Government’s objective of significantly boosting the supply of homes. In light of the historic failure to meet the housing targets in Medway, the inclusion of a housing specific objective would stress the importance of the issue and ensure the efficiency of the Local Plan.

Richborough is of the view that the inclusion of Objective 2 alone is not fit for purpose and a new Objective should be provided to explicitly state that the full range of need for new housing should be met and integrate a focus on deliverability.

### 3. Developing a Spatial Strategy

#### Development Needs

##### Paragraph 5.3 – SM calculation for meeting need

Richborough supports the use of the Standard Method figure for calculating local housing need and forming the basis for determining the housing requirement for the Local Plan. For Medway this is 1,667 dwellings per annum and equates to 28,500 dwellings over the Plan Period to 2040.

The NPPF was updated in July 2018, February 2019, July 2021 and again in September 2023 in order to introduce several new concepts, one of which related to the calculation of housing need. Whilst the objective of significantly boosting the supply of homes was retained, the way of calculating housing need was to be altered with the introduction of the 'standard method'. Although details of the specifics of the calculation are provided in the Planning Practice Guidance (PPG), paragraph 61 of the NPPF confirms that the standard method should comprise the 'minimum' figure, and states:

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”*

It is clear therefore that there are circumstances whereby a higher figure could be adopted over and above the standard method. The PPG provides further clarification on when it might be appropriate to plan for a higher housing need figure and states (Paragraph ID: 2a-010-20201216):

*“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”*

The guidance explains that circumstances where an uplift will be appropriate include, but are not limited to, where growth strategies are in place; strategic level infrastructure improvements are planned; and where an authority agrees to take on unmet need from neighbouring authorities.

It is important therefore to recognise that the need figure generated by the standard methodology should be considered as the minimum starting point in establishing a requirement for the purposes of plan production.

The calculation currently relies on household projections which focus solely on past growth trends and do not include a specific uplift to account for factors that could affect those trends in the future. Where it is likely that additional growth (above historic trends identified by household projections) will occur over the plan period, an appropriate uplift may be applied to produce a higher need figure

that reflects the anticipated level of growth. Richborough consider that an uplift to the need figure may be required to allow for the additional employment generated as a result of projects highlighted elsewhere in the Consultation Document.

The third Strategic Objective included in the Consultation Document for example states that Medway Council wish to realise the economic and place-making opportunities associated with the cluster of universities and colleges in Medway and *“Build on existing strengths and expertise, such as engineering, energy and creative industries, and raise the profile of key sectors, to attract and develop the jobs of the future”*.

Further consideration should also be given to whether there may also be an uplift required to address the historic under delivery in affordable housing, which is covered elsewhere in these representations.

In regard to the timeframes for development plans, Paragraph 22 of the NPPF makes specific reference to this and states:

*“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.”*

According to the latest LDS approved by Medway in October 2022, adoption of the Plan is likely to occur in autumn 2025 (leaving limited time for a Main Modifications consultation), which is well into the monitoring year, 2025/2026.

This scenario wouldn't allow for a full fifteen-year plan period at the point of adoption and the timetable is considered very optimistic in any case.

In light of this, Richborough is of the view that the Plan should look ahead to at least 2040/2041 in order to ensure that the Plan meets the requirements of NPPF paragraph 22.

#### **Paragraph 5.4 - Concerns with SM methodology - impact on affordability**

Paragraph 5.4 of the Consultation Document recognises that there is a housing crisis, particularly regarding affordability. Richborough is of the view that this is particularly the case in Medway with the Office for National Statistics median affordability ratio (household income to average house price) showing that affordability has worsened from 5.73 in 2014 to 8.65 in 2022. Whilst the Consultation Document refers to these issues, the proposed resolution is not clearly stated.

Issues with regard to the affordability of dwellings within Medway are also highlighted in the Local Housing Needs Assessment (2021), included in the Local Plan evidence base. Table 3.1 of the Assessment identifies that house prices in Medway, when compared with neighbouring authorities, increased at a much higher rate between 2000 and 2020. A change of 257% is the second highest of the six authorities included within the comparison and is significantly higher than the South East average of 218%. There are clear signals present within Medway in regard to affordability which should be factored into identifying the housing requirement.

As referenced elsewhere, in the nineteen years since the Medway Local Plan was adopted in 2003, overall housing completions have only exceeded the housing requirement figure that was in place at the time in only three years, and the three most recent monitoring years have seen the highest deficits. The cumulative under supply of housing since 2003 is 4,955 dwellings.

In respect of affordable housing completions, the annual need figure has not been met once since 2006 (the highest year was in 2008 and still saw a deficit of 305 dwellings) and the cumulative deficit in affordable housing over the 19 year period (2003-2021) is 10,012.

The emerging Local Plan housing requirement clearly needs to reflect both the worsening affordability and the previous poor housing delivery rates. These factors point to the need for a significant increase in the number of houses to be planned for.

Richborough supports the use of the standard method calculation for establishing local housing need as a starting point for calculating the housing requirement for Medway. The solution to worsening affordability in Medway is to build significantly more houses than has historically been delivered and to treat the proposed requirement as a minimum.

### **Paragraph 5.6 - Evidence base**

Richborough supports the reference to the need to demonstrate that the growth strategy is deliverable, to provide certainty and confidence in Medway's growth.

In accordance with the proposed strategy it will be critical for supporting evidence base documents to interrogate the viability of delivering sites at the density suggested and to thoroughly test the estimated delivery timescales of sites within the trajectory based on the level of infrastructure provision required. While there is no information available as to the delivery of the committed sites, the estimated delivery timescales for emerging allocations will need to factor in the speed with which strategic infrastructure works can be completed.

The viability of the proposed allocations should also comprehensively address the response to the loss of HIF funding for infrastructure improvement schemes, originally awarded to help deliver housing on the Hoo peninsular. While some development in Hoo may still be considered suitable, adequate evidence will need to be provided to show how sites can viably and sustainably come forward whilst also providing obligations to the necessary infrastructure improvements.

### **Paragraph 5.7**

Paragraph 5.7 references highway network constraints, including those associated with the Strategic Road Network (SRN), particularly M2 Junction 1.

Richborough consider that the issues raised by National Highways do not preclude appropriately located and planned growth across the north of the borough, and support the prioritised action by Medway Council, working alongside neighbouring authorities and wider stakeholders, to deliver appropriate mitigation. Such mitigation being likely to include both physical infrastructure improvements, as well as ensuring that proposed allocations can facilitate a reduction in the need to travel by private car, in line with DfT Circular 01-2022.



## **Paragraph 5.10**

Reference is made to potential impacts of new development on the environment, especially the designated habitats and landscapes which form a large part of Medway's area.

These include the Kent Downs AONB, as well as the Medway Estuary and Marshes Ramsar, Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI); Thames Estuary and Marshes SPA and Ramsar; Chattenden Woods and Lodge Hill SSS; and Tower Hill to Cockham Wood SSSI.

The ability to deliver significant levels of residential development sustainably alongside these important designations will need to be evidenced. Richborough is of the view that the second stage of the Land Availability Assessment (LAA) will need to assess how the residential development of each site can viably protect against the erosion of these features. Richborough is also of the view that Medway Council should look to develop a site selection methodology which prioritises sites which minimise impact on these key ecological designations.

## **Paragraph 5.11 - 2,000 homes to meet Gravesham's needs**

The Duty to Cooperate was introduced by the Localism Act 2011 and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (NPPF) (2023) confirms that local planning authorities are under a duty to cooperate with each other on strategic matters that cross administrative boundaries (Paragraph 24) and identify relevant strategic matters that need to be addressed in their plans (Paragraph 24). Paragraph 26 confirms that:

*"Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere."*

Richborough is of the view that it is imperative that Medway Council undertake discussions with neighbouring authorities at the earliest possible stage. This is particularly the case with Gravesham given the extent of Green Belt within the Borough.

Richborough expects further information to be published in this respect as discussions with neighbouring authorities continue, although it is prudent at this early stage of Local Plan preparation to accommodate and make allowances for the potential 2,000 additional homes that may be required to meet Gravesham's needs.

## **Paragraph 5.13 - Sources of Housing Supply (Figure 2)**

Richborough is of the view that the figures included in the sources of supply at Figure 2 and paragraph 5.13 remain to be adequately evidenced.

A pipeline of sites with planning permission for over 7,500 homes is referenced in paragraph 5.13 of the Consultation Document. However, it has not been possible to find any detail or evidence of this pipeline in the documents supporting the current consultation. Paragraph 68 of the NPPF requires strategic policy-making authorities to have a clear understanding of the land available in

their area through the preparation of a Land Availability Assessment (LAA). This should take account of the availability, suitability and likely economic viability of sites and specify those that are 'deliverable' in years 1-5 and 'developable' in years 6-15.

Richborough understands that a LAA is being prepared but detailed evidence of the pipeline of sites should be made available as soon as possible, given that this information already exists, in order to ensure that the supply is deliverable and developable.

Figure 2 identifies a projected windfall allowance of 3,000 homes up to 2040.

Windfall development is defined in the Glossary of the NPPF as *"sites not specifically identified in the development plan"*. Paragraph 70 also provides background to windfall development and sets out the following guidance on when an allowance might be appropriate:

*"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."*

Furthermore, in order to be justified and avoid double counting with sites included as commitments within the supply, any annual windfall allowance can only be factored in three years after the base date. It has been assumed that the current base date of the supply is 1 April 2023, and therefore a windfall allowance can only be included from the year 2026/2027. However, if the Local Plan is ultimately not adopted until 2026, which seems likely, then the windfall allowance should only be added from 2029/2030.

Therefore, given the requirement of NPPF Paragraph 22 for Local Plans to look ahead fifteen years on adoption, it has been assumed that the windfall allowance can only be applied for twelve years of any plan period, at the most.

On this basis, the proposed windfall figure of 3,000 dwelling equates to a likely annual allowance of 250 dwellings per annum.

Whilst historic levels of windfall development may have exceeded that figure in the recent past this is likely to be a result of the fact that there hasn't been an up to date Local Plan for over ten years and for much of that time the authority has not been able to demonstrate a five year supply of deliverable sites. Richborough is of the view that any assessment of historic windfall development should be cognisant of such matters and should only include an allowance where it is possible to demonstrate that windfall will continue to be a reliance source of supply in the future.

Richborough consider the Council has failed to recognise the effect on housing delivery of a newly adopted Local Plan with deliverable residential allocations. The change in the strategic Policy position on adoption of a new Local Plan in Medway will radically increase the level of investment into the Borough's housing market and increase the number of houses being built with support provided by an allocation. The result of this is that there should be a smaller windfall allowance. The previous trends in respect of windfall delivery relate primarily due to the datedness of the current Plan and the failure of Medway to progress a replacement.

Figure 2 also identifies that there is a requirement to identify residential allocations totalling 19,173 dwellings. Together with the figures for the pipeline of sites with permission and the windfall allowance, both of which Richborough have requested further evidence in order to justify, the overall supply totals just 29,756 dwellings. This exceeds the housing need figure of 28,500 dwellings by just 1,256 dwellings, which provides flexibility of less than 5% for non-delivery of the pipeline, windfall or allocations. This excludes the potential requirement to meet the needs of Gravesham. As previously referenced, the historic under-delivery of housing in Medway has been well below the relevant annual requirement, which confirms that the current supply of housing land is not flexible enough to ensure that land is brought forward at sufficient pace. This has led to issues in respect of affordability of housing and Richborough considers the need for additional flexibility be built into the emerging land supply to ensure the timely delivery of housing across the Borough throughout the Plan Period. Given the level of infrastructure which is required to deliver the future allocations combined with the track record of the supply trajectory, Richborough is of the view that the supply resilience buffer should be at least 10%, and potentially as high as 15%.

This is in addition to a non-implementation discount which should be considered for sites in the urban area and those on the Hoo Peninsula, which are constrained by viability and the need for significant levels of infrastructure.

Given the long term lack of housing delivery, Richborough is also of the view that the emerging Local Plan should make provision for a stand-alone policy which relates to the monitoring of housing delivery. This should include provision for identified 'contingencies', where it is apparent that delivery rates are falling short of what is anticipated. This will formalise a positively prepared approach to monitoring housing delivery and stimulating action where necessary.

Granting planning permission for additional new homes is likely to be the most effective way to address any delivery of housing and the contingencies should therefore include the release of previously identified 'reserve' sites.

Richborough is therefore of the view that Medway Council should allocate additional sites and reserve sites in the Plan that could be released if monitoring continued to show under delivery. This would enable the issue to be addressed promptly, without the need for a full or partial review of the Plan.

Richborough is of the view that the monitoring policy should clearly establish that if monitoring shows that the Plan is not delivering housing as required, then Medway will grant permissions for additional housing; release reserve sites; and undertake other actions to help bring schemes forward, in that order. The Policy wording should also set strict deadlines for publication of monitoring each year and failure to do so would trigger the contingencies. The end of the calendar year is a reasonable time frame for monitoring data to be collected and published and should be identified as the deadline within the Policy. It is important for any under-delivery of housing to be addressed as soon as possible.

## **Paragraph 5.15**

Richborough supports the clear intention to transform the Borough's poor track record on housing delivery by seeking to meet identified needs and the acknowledgment that this will lead to "*the*

*transformation of urban centre and waterfront areas and large-scale development in suburban and rural areas”.*

Richborough supports the strategic approach to the distribution of development referred to in this statement, which recognises that the scale of housing need will have transformational impacts across the entire Borough. Richborough is of the view that the identified needs can only be met if development is allocated across a range of areas, including those where development is most viable and not solely focusing on the Hoo peninsula and urban locations. This is particularly the case since the withdrawal of the HIF funding.

The paragraph refers to the Land Availability Assessment identifying a capacity for 38,200 homes which will proceed to the next stage of detailed assessment. Richborough supports the intention to assess these sites rigorously and agrees that given the Borough-wide constraints in regard to environmental considerations, infrastructure requirements and viability, many of these sites will not be found to be suitable, available or achievable.

Richborough is also of the view that rigorous viability work needs to be provided that tests all modified development management policies, including changes to Building Regulations and likely changes to the NPPF, so as to clearly evidence that they do not result in onerous requirements that would prohibit much needed sustainable development being brought forward.

## **Urban Regeneration**

### **Paragraph 5.25 - Issues and Constraints**

Richborough acknowledges the reference to the requirement for new development to be sensitive to the designated historic features in the urban area of Chatham. It is critical to the protection of the local historic character that new development is of a high quality and sensitively designed to complement the historic features in situ. The holistic development of the urban area will be critical to achieving this and will inevitably impact on the lead in times and delivery rates of new dwellings within this area.

Richborough notes that the urban area is also affected by the Marine Conservation Zone and includes the historically politically sensitive Chatham Waterfront. It is critical that the emerging Local Plan rigorously assesses the suitability of sites in this area and whether they can be developed sustainably and viably, as well as deliver the typology of housing for which there is a need.

### **Paragraph 5.26 - Issues and Constraints associated with viability**

Richborough agrees with the assertion that sites in the urban core area are likely to have greater viability constraints due to costs associated with demolition and site remediation as well as the usual obligations relating to the provision of affordable housing and infrastructure requirements. A Viability Assessment which considers the whole plan, including the ability of sites to meet requirements in respect of sustainable construction, accessibility and dwellings standards should be undertaken.

Whilst urban regeneration schemes help deliver housing in sustainable locations and at higher densities, the lead-in times for urban sites where there are technical or ownership challenges to

overcome can impact the rate of housing delivery. Too much reliance on urban sites in the Local Plan trajectory should be avoided, as much needed housing may be slow to be delivered.

Richborough also questions the suggested capacity of sites in the urban area given the Council's clarification that 109 of the housing sites in this area have not been proposed by landowners or promoters and cannot therefore be classed as available (paragraph 3.1.5 of the LAA Interim Report). These sites have most likely been available for several years without development coming forward despite Development Briefs being prepared and rising house prices in the areas generally. Many of these sites also currently appear to be in alternative uses with no certainty they will come forward at all. There does not appear to have been any consideration of implications for current uses. The Stage 2 Assessment will clearly need to rigorously assess the urban sites given the breadth of constraints in respect of suitability, availability and viability concerns.

### **Paragraph 5.27**

Whilst Richborough agrees that residential development in urban areas presents opportunities for regeneration, the quantitative and qualitative needs for housing in Medway cannot be met only in these areas.

The PPG provides guidance (paragraph: 018 Reference ID: 3-018-20190722) on assessing the suitability of sites and highlights the following factors for consideration:

- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

Urban core developments are typically high density apartment-led schemes, which deliver smaller homes with limited private amenity space.

Table 6.1 of the Local Housing Needs Assessment (LHNA) (October 2021) provides the overall annual dwelling type and tenure mix recommendations and shows that 15-20% of new housing is recommended to be 1 bedroom flats and 20-25% 2 or more bedroom flats. While this shows that there is an identified need for smaller flatted development in Medway, the majority of the need remains for larger houses. These typologies clearly do not accord with town centre locations.

Paragraph 5.11 of the LHNA confirms that the expected housing choice for 65.3% of older households is to downsize. The stakeholder engagement summary provided at paragraph E9 suggests this is a desire to downsize to bungalows or small units in "community-based" developments. These identified needs do not necessarily align with significant urban area growth and would more likely be met through suburban development.

In respect of affordable housing need, Table C9 of the LHNA provides a comparison of existing affordable housing stock against annual need by bedroom numbers and it is clear that there is a particular shortfall of 4 or more bedroom affordable dwellings. Given the high density nature of residential developments in urban locations, due to land availability and viability pressures, it is

unlikely that this shortfall in qualitative affordable housing need is going to be met in urban areas. Richborough is also concerned about the potential for such schemes to deliver any affordable housing at all given the possible viability issues. Further work is needed to be able to demonstrate that the affordable housing need can viably be met at both a Borough-wide level, but particularly on sites in the urban area. If affordable housing cannot viably be delivered in these areas, additional residential allocations will be required in more viable suburban or rural areas to ensure the Borough's qualitative housing needs are met.

With regard to the delivery estimations for land in the urban area, such as Chatham Waterfront for example, there are inherent risks associated with relying on new residential markets to emerge in town centres in order to meet a Borough's housing requirement. This approach places significant burden on these locations given the context of them not being established residential locations with appropriate services and amenities and being reliant on developers providing or contributing to new residential markets from a standing start. It would therefore be prudent for the emerging Local Plan to progress with conservative estimations on delivery in these unproven locations so that if delivery falls short this does not undermine the delivery of the Borough-wide housing requirement. It is for these reasons that Richborough has suggested applying a non-implementation discount to sites in the urban area. For instance, the Submission Version Local Plan for Dover District Council has included a 5% non-implementation discount on sites in certain areas within the housing trajectory.

The urban areas have acknowledged availability and viability challenges and an out of date Local Plan that has relied too much on residential development in this location has failed to address the market attractiveness of the claimed supply. Richborough are therefore promoting a mixed spatial strategy for residential development, with growth being appropriately spread across the Borough to urban, suburban and rural locations.

## **Suburban Expansion**

### **Paragraph 5.30**

Richborough supports and agrees with the statement that greenfield suburban sites can be developed quickly and respond to market demand, particularly where landowners have confirmed the land is available and being promoted for development. Typically, greenfield sites are not restricted by viability and are capable of meeting the aims and policies of Local Plans in respect of contributions to infrastructure, the delivery of affordable housing and meeting technical requirements in respect of sustainable construction and dwelling standards.

### **Paragraph 5.31**

Richborough supports the point that suburban residential development can provide opportunities to enhance sustainable travel options as well as provide for local services. Such development can viably sustain and justify financial contributions which significantly enhance walking and cycling connections to major services and/or public transport options. This could include improvements to be identified in the Local Cycling and Walking Infrastructure Plan.

## Paragraph 5.32 - Issues and constraints

As previously referenced, the suburban areas to the south and east of the District are fairly heavily constrained by the Kent Downs AONB, as well as the ecological designations associated with the Medway Estuary (Special Protection Area, Ramsar Site and Site of Special Scientific Interest) and the Capstone and Riverside Country Parks. The ability to deliver significant levels of residential development sustainably alongside these important designations will need to be evidenced. Richborough is of the view that the second stage of the LAA will need to evidence how the residential development of each site can viably protect against the erosion of these features. Richborough is also of the view that Medway Council should look to develop a site selection methodology which prioritises sites which minimise impact on these key ecological designations.

## Paragraph 5.34

Richborough notes that there are concerns over the availability of amenities and services in existing towns and neighbourhoods in the southern and eastern suburban areas. It should be ensured that any emerging residential allocation can appropriately and viably mitigate for additional pressures on existing services, such as schools and doctors. The cost of providing new schools and doctors services is likely to require financial contributions from a significant number of residential developments; Richborough is of the view that the ability of the unconstrained land in the suburban area to generate sufficient funds for these required amenities should be assessed.

## Paragraph 5.35

The image provided at Map 2, titled “overview of potential sites for Suburban Expansion” shows that the identified sites are located in the south east and southern parts of the Borough. Paragraph 5.35 identifies that:

*“Land in this area lies close to Medway's boundary with neighbouring authorities, particularly Swale and Maidstone. Development in these locations would potentially have a cross-border impact. Development to the east of Rainham would erode the strategic gap between Rainham and Newington and add further to the congestion and pollution issues on the A2. Development to the south around the Capstone Valley would potentially adjoin the development of the proposed 'Lidsing Garden Community' in Maidstone. The landowner is promoting a cross-border masterplan. There are a number of potential impacts, including transport, infrastructure and the natural environment.”*

In respect of the transport impacts, Richborough consider that there are likely to be substantial issues with the proposal to locate significant expansion in the southern parts of the Borough, including the 'Lidsing Garden Community'. Development south of the authority boundary will not count towards meeting the housing requirement for Medway, but the resulting traffic will significantly impact M2 Junction 4 and the M2 corridor around the south of the Borough. This will potentially limit the opportunities available for sites identified within Medway to deliver effective mitigation.



## Rural Development

### Paragraph 5.36 - Rural Development Sites

Richborough are promoting a Rural Development Site for a mixed use residential-led development of around 800-900 dwellings, a local centre and new primary school. The Site is Land off Lower Rochester Road and has been given the Site Reference SR17 in the Land Availability Assessment (LAA). The Site is shown on Map 3 - overview of potential sites for Rural Development. However, it should be noted that the Stage 1 Land Availability Assessment proforma for Site SR17 classifies it in the 'Suburban' Group.

Richborough submitted the site to Medway Council as part of the Call for Sites consultation in 2023, and included a Vision Document with the submission which presented a technical assessment of the site, a review of constraints and opportunities and also an Emerging Concept Plan.

The Site comprises approximately 48.3ha of land to the north of Wainscott and predominantly comprises agricultural land. Blacklands Farm lies in the south eastern corner with a residential dwelling and six farm buildings. There are Polytunnel structures situated in the eastern extent of the Site. Agricultural buildings and hardstanding associated with Sole Street Farm lie within the south western corner of the Site.

The Site is bound to the:

- North west entirely by Dillywood Lane
- North east and east by Higham Road / Bunters Hill Road and rear gardens of properties along Higham Road
- South by the A289 Hasted Road, residential properties and a tree belt
- West by the B2000 Lower Rochester Road, residential properties (Springfield Cottages) and agricultural land

Beyond the A289 Hasted Road to the south is the settlement of Wainscott, whilst to the north, east and west is agricultural land with scattered residential dwellings and farms. The Site lies close to the boundary with Gravesham Borough Council. The boundary with Gravesham also forms the Green Belt boundary to the north, with a small section of Green Belt within the Medway Council authority area, to the west of the Site.

There are existing amenities and services nearby which can be reached on foot, bike or public transport, although the scale of the proposed development ensures the Site is relatively self-sufficient with provision made for a local centre and school.

The Site is also located close to existing public transport links to Wainscott, Chatham and Strood, although there is an opportunity to introduce a bus service through the development; this will most likely take the form of a circular service connecting the Site with Wainscott, Strood Railway Station and Strood Town Centre, with a 30-minute frequency considered to be viable.

There are two railway stations close to the site, Higham and Strood, both stations have regular services to London St Pancras, Luton Airport, Gravesend, Ebbsfleet Maidstone and Chatham. The Site is clearly sustainably located.

The Consultation Document highlights that much of the Hoo peninsula is the subject of statutory designations and highlights its national importance in respect of ecology. The Site promoted by Richborough is not affected by any statutory ecological designations such as SSSI's, SPA's or Ramsar sites.

### **Paragraph 5.37 - BMV**

There is reference to the large extent of Best and Most Versatile land for agriculture. Given the level of housing need across the Borough, including the potential to plan for 2,000 homes from Gravesham's need, Richborough is of the view that there will be a need to allow some loss of BMV land to meet the housing needs in full.

### **Paragraph 5.40 - Hoo Peninsula**

The opportunities identified in respect of Rural Development appear to relate primarily to land on the periphery of the peninsula or around the settlement of Hoo. The assertion in respect of the ability of Hoo to deliver planned growth without the HIF funding programme will need to be fully evidenced and justified as the Local Plan preparation progresses.

Richborough contend that Hoo can accommodate a level of residential growth but any transformational change of this area of the Borough will be severely hampered by highway and accessibility constraints as well as the need to provide additional services and amenities. The existing highway capacity issues will need to be comprehensively addressed, including those at the Four Elms Roundabout, as part of any Local Plan that seeks to allocate a strategic level of growth at Hoo.

There is a high dependence on private vehicles for most residents on the Hoo Peninsula given its relative poor access to public transport and the capacity constraints of junctions on the existing nearby road network. Future evidence base documents will need to clearly demonstrate how these constraints are to be overcome.

There are a handful of Rural Development sites that are less constrained by existing highway issues given their location closer to Wainscott and Strood. The Site promoted by Richborough is included in this tranche of sites and is also located close to the existing services and amenities of Wainscott, south of the A289. While the categorisation of sites in the Consultation Document does not comprise a spatial strategy for the distribution of growth, Richborough would question how the categorisation has been made. It can be argued, based on the Opportunities presented in the Consultation Document, that the SR17 Site is more closely aligned to the matters of relevance to the Suburban Development sites, rather than the highway focussed Rural Development site matters.

Richborough welcome further consultation with Medway Council and the Local Highway Authority on the access strategy for Site SR17, although a technical assessment of the local highway network has shown that the development of the Site for 800 dwellings can be safely accommodated within the highway network with the primary point of access being from Lower Rochester Road. The

Emerging Concept Plan provided within the submitted Vision Document indicates a proposed new roundabout on this stretch of road. The Vision Document also refers to improvements to the Four Elms Roundabout, including an integrated left turn lane to ease congestion at this key pinch point. This work was originally due to be funded by HIF but is now proposed to be funded and provided by promoters of SR17, which is a major benefit of the proposals.

Richborough are aware of wider highway improvement schemes under consideration (some of which were reliant on the former HIF funding programme) and considers junction improvements proposed as part of proposed development at Site SR17 will help realise the aim of reducing congestion levels at Four Elms Roundabout and increasing capacity towards the Hoo peninsula.

### **Paragraph 5.45**

As previously referenced, the development of Site SR17 could include the provision of a new 30-minute circular bus route, thus linking the site to Wainscott, Chatham and Strood. Further improvements to cycle links, including connecting into the national cycle network are also being considered and could potentially be included within the Local Cycling and Walking Infrastructure Plan. National Cycle Network (NCN) Route 1 passes along the northeastern frontage of the site on Higham Road and Bunters Hill Road, providing a cycle connection to Higham Railway Station to the northwest of the site, which takes less than 15 minutes. There are fewer highway constraints associated with Site SR17 than a transformative scale of development at Hoo and the site can be delivered without external funding.

Site SR17 can also link more easily to the existing services and amenities to the south of the site at Wainscott and Strood. There is therefore less reliance on developer contributions or funding streams to deliver new amenities and services required to make development deliverable than is required at Hoo. Developer contributions from Site SR17 can contribute to the improvement of existing services and amenities.

## **Green Belt Release**

### **Paragraph 5.52**

The NPPF states that the Government attaches great importance to the Green Belt and its fundamental aim is to prevent urban sprawl by keeping land permanently open. Whilst the Green Belt is not an environmental designation, it is a strategic planning tool which was introduced to manage the growth of urban areas. It is therefore wholly appropriate to revisit Green Belt boundaries when development requirements justify this.

Richborough do not consider it necessary for an authority such as Medway, with only 5% of its land as Green Belt, to propose the removal of Green Belt parcels for residential development as exceptional circumstances are unlikely to be demonstrated. While Medway is also constrained by ecological designations, the Green Belt in Medway plays an important role in maintaining the strategic gap between local settlements, including Strood and Higham, Cuxton and Meopham and Snodland and Rochester.

The possible cross authority development sites and emerging allocations on the boundary of Medway are coming forward in the context of Gravesham, Maidstone and Tonbridge and Malling

being heavily constrained by Green Belt. The Green Belt sites in Medway, as referenced in the Consultation Document, also include significant swathes of the Kent Downs AONB. These designations are afforded national policy protection, and the loss of these sites are to be avoided wherever possible. Paragraph 176 of the NPPF states *“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues...”*

There is sufficient land outside the Green Belt in Medway, brownfield and greenfield land, to meet housing needs. Richborough do not consider the possibility of providing a cross authority development an exceptional circumstance to justify Green Belt loss when suitable sites, such as Site SR17, are available. Paragraph 141 of the NPPF confirms before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.



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## **Future Medway Local Plan 2040**

### **Response to the Regulation 18 Consultation – Setting the Direction for Medway 2040**

**Land at 1 Ropers Cottage, Ropers Lane, High Halstow, Hoo St Werburgh, Rochester, Medway ME3 8AD**

**On behalf of Mr and Mrs R Goatham**

#### **Prepared by:**

Thomas Ogden BSc (Hons) MRICS MBAIC AssocRTPI

**Date:** 30 October 2023

**Job Ref:** 01.002.1437

# 1. Introduction

- 1.1. We are writing on behalf of our client, Mr and Mrs R Goatham, in respect of the Medway Council's Local Plan – Regulation 18 Consultation Report-Setting the Direction for Medway 2040.
- 1.2. This representation promotes a site extending to approximately 0.8 hectares on the east side of Hoo, just west of the railway line at 1 Ropers Cottage, Ropers Lane, High Halstow, Hoo, ME3 8AD.
- 1.3. The site is allocated the reference HHH30 in the recent Medway Land Availability Assessment (LAA) 2023.
- 1.4. The site was recently promoted as part of land in response to the Hoo Development Framework (HDF) Consultation document which set out how our client's site should be allocated to support the expansion plans at Hoo which the Council is carrying forward.
- 1.5. The site is owned by Mr and Mrs Goatham and at this stage is being promoted solely on their behalf.
- 1.6. This site, located in the Hoo Peninsula rural development area, could contribute to the Council's substantial housing requirements within the district, especially when joined with the neighbouring sites and identified as part of the plan.
- 1.7. It is considered that the site provides an opportunity for additional housing and or mixed development, and hence, positive growth in the Medway area to 2040.
- 1.8. This representation responds to the current Regulation 18, by setting out how the site meets the aspirations and broad spatial strategy being promoted in the Local Plan, specifically in the rural area. In addition to responding to each of the headings in the consultation document, and identifying how the site can deliver the vision and objectives through sustainable development.

## 2. Context

- 2.1. The production of the Medway Local Plan has involved several key stages. Three stages already having been completed, the 'issues and options' (Regulation 18) completed in 2016, the 'development options' (Regulation 18) completed in 2017, and the 'development strategy' (Regulation 18) completed in 2018. This consultation, 'setting the direction for Medway 2040' (Regulation 18) consultation, marks the fourth consultation phase and the final Regulation 18 consultation before the publishing of the Regulation 19 draft plan.
- 2.2. The current consultation period considers why the Council needs to plan for Medway's growth. It refers to aspects of Medway that need to be safeguarded for the future, such as beautiful landscapes and historic buildings. The consultation document also outlines potential options for building new homes, workplaces and services, such as schools and surgeries.
- 2.3. It is understood that this consultation does not detail policies or identify those sites preferred by the Council for new development, but does relay key areas where development could come forward.
- 2.4. This representation seeks to promote a 0.8 hectares of land on the north eastern side of Hoo, the extent of which can be seen at **Figure 1** below.



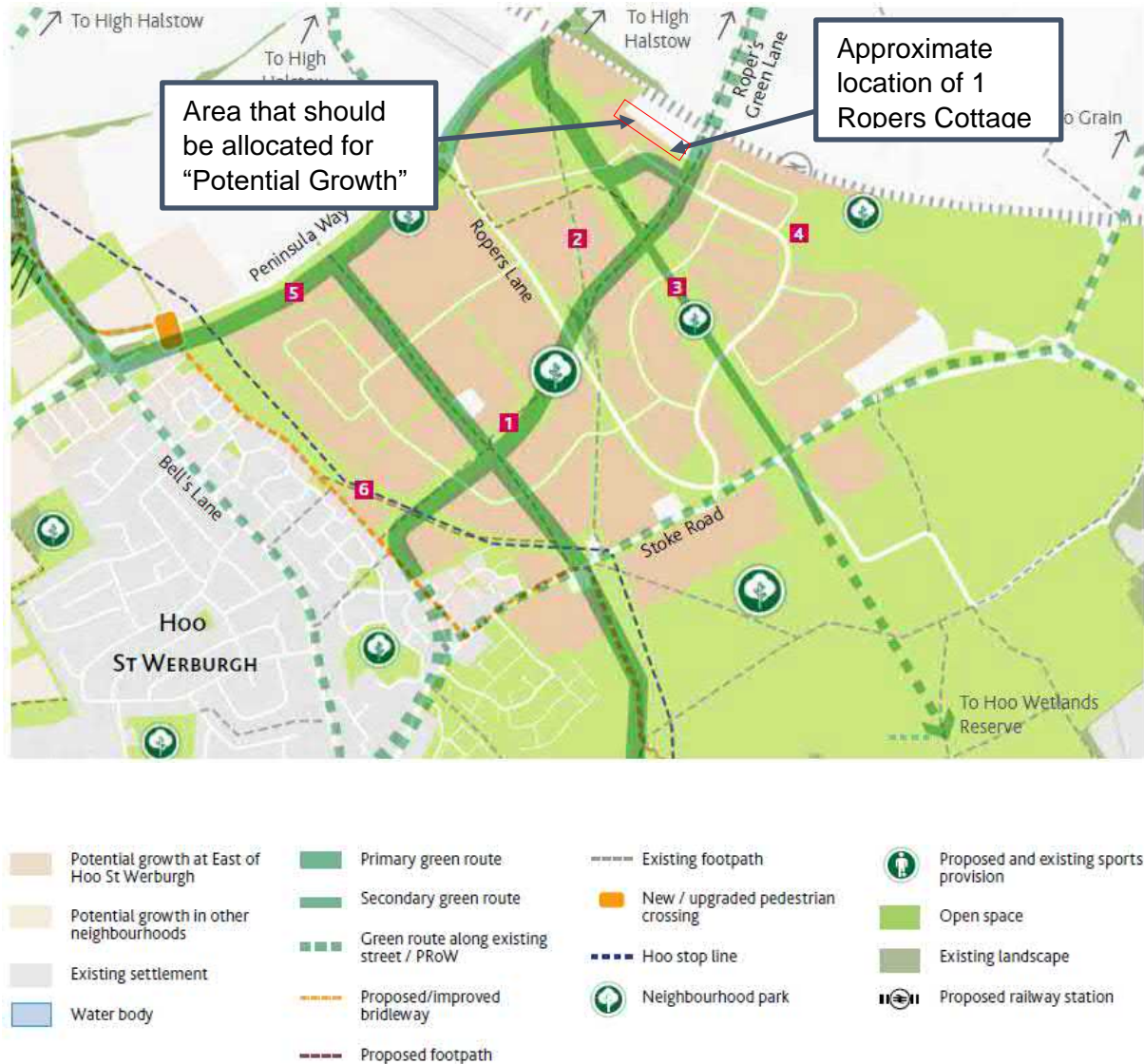


**Figure 1 – Google Earth showing extent of site promoted in the Local Plan.**

- 2.5. The recently published interim Land Availability Assessment for Medway (September 2023) does include an assessment of the site, with site reference HHH30. This document recognizes the site **does not** comprise “*Habitats Sites*”, *Irreplaceable habitat*” and is **not** an “*Area at risk of flooding*”. It is on this basis that **the site is recognized as capable of delivering 5 or more dwellings, or economic development of over 0.25 ha** and which is **recommended to proceed to Stage 2**.
- 2.6. The strategic location and size of the site provides the opportunity for the delivery of a residential scheme with potential economic development which could be developed in isolation or more strategically with the neighbouring sites.

### 3. Site description and history

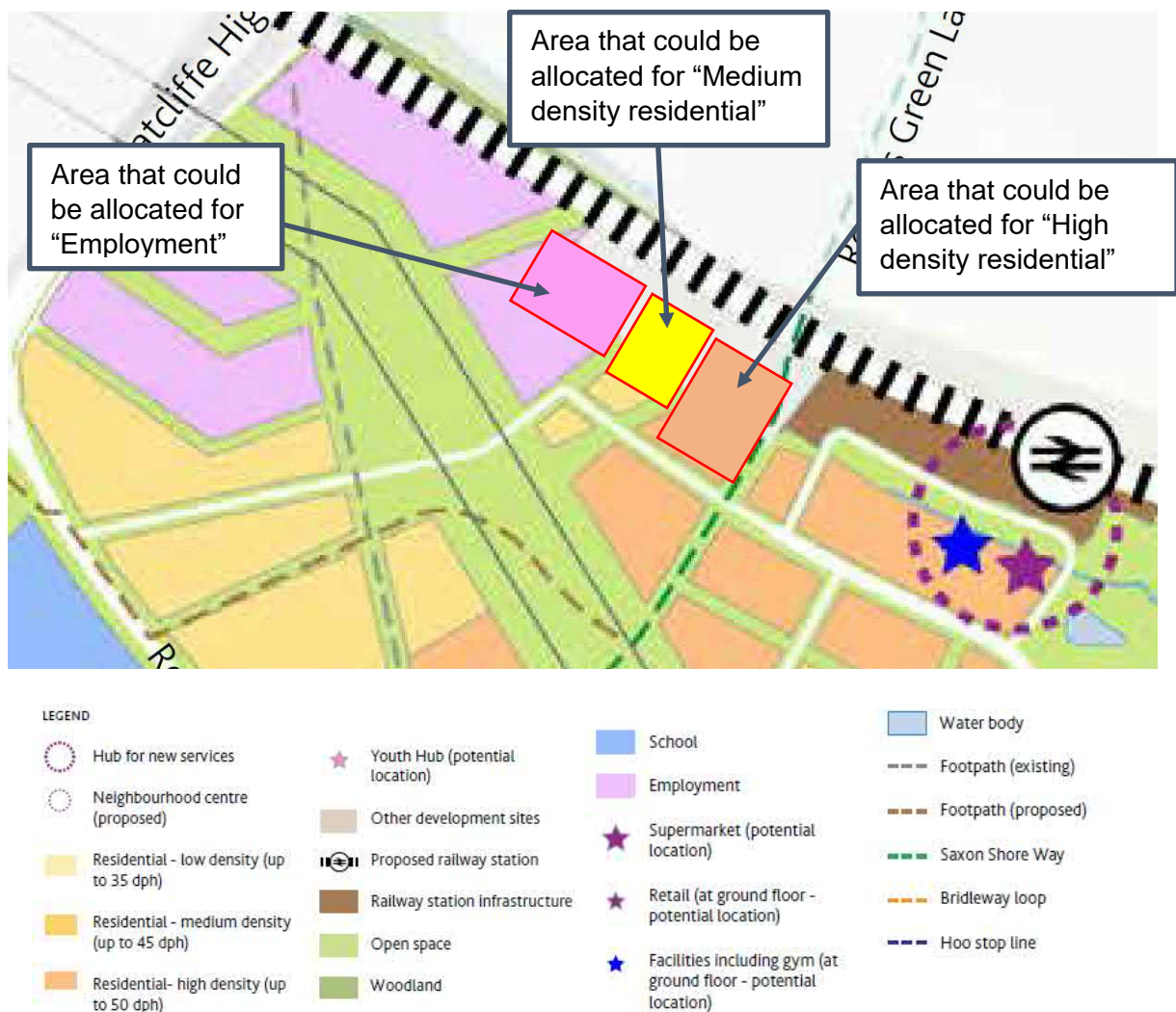
- 3.1. The Hoo Development Framework (HDF) document proposes that our client's property be surrounded by built form on all sides. The extent of this is shown below at **Figure 2**.



**Figure 2** – Figure 5.39 in the HDF document showing the approximate location of our client's property and the area surrounding this proposed for development - our client's site is outlined in red immediately to the south of the railway line.



- 3.2. Giving due regard to figure 5.45 of the HDF document on page 103, logic would be that the bottom third of this currently excluded area be allocated as high yielding residential density (up to 50 dph) the middle section be allocated for residential development with a medium yielding density (up to 45 dph) whilst the most northern third be considered employment land or even housing at a low or medium density. This would tie in well with the currently proposed scheme set out at figure 5.38 on page 99 of the HDF document as illustrated below at **Figure 3**.



**Figure 3** – Figure 5.38 showing the summary diagram of the proposed 'East of Hoo St Werburgh neighbourhood area' as proposed in the HDF document and how our client's site could be allocated having regard to this.

- 3.3. The site is well located next to proposed development in a sustainable location. The proximity of a proposed pedestrian areas in the locality further supports good connections to existing and proposed bus links, pedestrian and cycle paths, which will all link well with Hoo St Werburgh.
- 3.4. Allocation of the site for residential development would be consistent with the objectives of the NPPF which seek to support sustainable development in accordance with the environmental, economic and social objectives. Development would make a significant contribution to each of these as set out at Paragraph 8 of the NPPF.
- 3.5. There are no known constraints that would prevent development of the site, and further detailed assessments would be provided to accompany any future planning application to address any perceived site-specific issues.

## 4. Deliverability

- 4.1. Paragraph 68 of the National Planning Policy Framework ('NPPF') requires for plan-making, local planning authorities ('LPAs') should identify and update a supply of specific deliverable sites sufficient to provide 5 years-worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of. Furthermore, specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan need to be clearly set-out.
- 4.2. The Glossary of the NPPF defines deliverable and developable as following:

*"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

*a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*

*b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.*

*“Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.*

#### Availability

- 4.3. Mr and Mrs Goatham, who own the site, have confirmed that the site is available. On this basis, and subject to its inclusion in the Local Plan, the site can become available in the first 5 years of the Local Plan period.

#### Suitability for Residential Development

- 4.4. The site is easily accessible off the main Ratcliffe Highway / Peninsula Way highway from Ropers Lane immediately to the north of Hoo. There are no perceived constraints that could not be overcome to facilitate development on the site.
- 4.5. The site would be suitable for housing development, as a highly sustainable and logical extension to the settlement of Hoo. If the site were to come forward for a mixed residential / economic development, it could also sit comfortably with the adjoining existing and proposed site uses.
- 4.6. The site would form a positive approach to housing delivery in Medway. Giving due regard to the range of possible densities that could be adopted on the site (as per paragraph 3.2 above) the site is capable at accommodating between 25 and 35 units – more, should high rise flats be considered; and depending on any possible allocation for economic and or retail purposes.

#### Achievability

- 4.7. Subject to the grant of necessary planning permission, the site is realistically capable of delivering development in the early phases of the Plan period. Development viability will be assessed by taking into account the affordable housing requirements, other obligations and market conditions at the time when development proposals are promoted through the planning application process. At this stage, there is no indication to suggest that there will be any viability issues for housing development on this site.

## 5. The vision for Medway in 2040

- 5.1. The NPPF (paragraph 20), sets out that strategic policies should *‘set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for [amongst others]:*
- a) *housing (including affordable housing), employment, retail, leisure and other commercial development’;*
- 5.2. Furthermore, the National Planning Policy Framework (‘NPPF’) requires that in order to boost housing supply, local planning authorities (‘LPAs’) should identify a supply of specific deliverable sites sufficient to provide 5-years’ worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of housing.
- 5.3. The consultation report highlights in paragraph 5.4 that *“It has to be recognised that there is a housing crisis, particularly regarding affordability and there is an absolute need to provide the right homes in the right places to meet Medway’s growing needs and the requirements for those desperately needing a good quality home”*. It goes on to acknowledge that many existing residents are living in over-crowded and / or sub-standard housing conditions.

- 5.4. It is important that the protection of the intrinsic character and qualities of a site or an area are considered, but these qualities can be protected when new housing development is delivered, through good design and by improving the sustainable networks and access to places and services. Rather than seen as negative, new housing development should be seen as an opportunity to improve the area for the current and future residents delivering the types and quantity of homes that are desperately needed. On this basis, respectfully, reference to ‘housing delivery’ should be made in the vision.
- 5.5. It is submitted that the development of the site, either delivered in solo or in conjunction with the adjoining proposed development sites could form a housing-led scheme which could be an option to deliver not only the existing elements of the vision for Medway, but could also deliver important housing numbers in the Medway area early-on the plan period. The site is both available and the development of the site is achievable.

## 6. Strategic Objectives

- 6.1. Paragraph 119 of the NPPF sets out that *‘planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions’*.
- 6.2. It is set out in the current consultation that *“The role of the Local Plan is to plan positively for the development and infrastructure that the area needs, whilst conserving and enhancing the natural, built and historic environment”*.
- 6.3. In order to deliver the Local Plan, it is proposed that the plan is set around strategic objectives. *“The objectives will feed into the wording of policies and how sites and different locations are assessed for potential development. The objectives are presented around broad themes for the environment, communities, economy, and investment in infrastructure and design that is fit for the future”*. This representation **supports** the use of objectives to deliver the strategic aims of the plan, but wishes to raise the following comments regarding the individual objectives:



Objective: Prepared for a sustainable and green future

- 6.4. The objective to support action against climate change and a sustainable future for Medway is **supported**. This actively meets the aspirations of paragraph 153 of the NPPF which sets out that *'Plans should take a proactive approach to mitigating and adapting to climate change'*.
- 6.5. This representation promotes the delivery of a site in the rural area to help deliver 14,736 homes as a way, amongst others, that could deliver a sustainable and green future for Medway.
- 6.6. Paragraph 5.41 of the Regulations 18 consultation, sets out that *"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"*.
- 6.7. This statement is supported and the site provides an opportunity to deliver this strategy.

Objective: Supporting people to lead healthy lives and strengthening our communities

- 6.8. Section 8 of the NPPF provides guidance on *'Promoting Healthy and Safe Communities'*. The proposed objective in the Medway Local Plan actively meets this objective and is therefore **supported**. But, respectfully it is considered that there is an **omission** in how the objective is drafted.
- 6.9. The intentions of the third bullet point, proposes to strengthen the role of Medway's urban, neighbourhood and village centres..." This position is supported, but it is considered that 'rural extensions' should also be included in this objective, especially, as the rural development sites are included within the proposed spatial strategy for delivering growth.

Objective: Boost pride in Medway through quality and resilient development

- 6.10. This representation **supports** the provision of quality and resilient development in Medway and we support the Council's recognition that growth does not mean losing character of an area.
- 6.11. The second bullet point sets out that sustainable development should be directed to the *"most suitable locations that can enhance Medway's economic, social and environmental characteristics"*. This stance is supported, as it acknowledges that development of both brownfield and greenfield sites can come forward to meet the housing requirement. The most suitable locations that can enhance Medway's economic, social and environmental characteristics should be utilised to deliver the housing requirement of the area.
- 6.12. An allocation for development of the site could provide an opportunity to deliver this objective, in a development which meets the aspirations of sustainable development, directing development to the most suitable locations.

## **7. Strategic objectives**

- 7.1. The level of housing need required for the Medway area identifies a requirement for 1,667 homes a year in Medway, which provides a total figure of around 28,500 homes to be delivered before the end of 2040. This figure could further be increased, as it is identified in paragraph 5.11 of the consultation that Medway Council are currently considering a request from Gravesham Borough Council to increase capacity by 2000 homes to help meet the housing need of their district.
- 7.2. In March 2023 Gravesham Borough Council produced its Five Year Housing Land Supply Statement, covering the period 2022-2027. This document sets out that Gravesham only has 2.9 years of deliverable housing supply. In accordance with the Gravesham Local Development Scheme (January 2023) the new Local Plan for Gravesham is not expected until December 2024, and thus, the Borough's Housing Land Supply (HLS) is not likely to improve in the near future. The high likelihood of Medway having to absorb some of this housing need should not be ignored in the early stages of Local Plan creation for Medway.

- 7.3. It is understood that Medway Council are still establishing final housing need numbers, due to the Council raising concerns with the Government derived figures, and the basis and calculations on which final numbers are determined. However, it is made clear in paragraph 5.13 of the consultation that the Council will look to find potential site allocations enough to provide for 19,000 dwelling units, the additional 7500 sites being provided through extant supply.
- 7.4. We wish, respectfully, to raise an **objection** to this approach advocated by paragraph 5.13 because the acknowledged uncertainty in the number of housing numbers required to be delivered, means that a more proactive approach, by allocating more sites, should be taken.
- 7.5. The Council should be looking at allocating more sites, to meet a potential increased capacity, in the Local Plan to ensure that there is an appropriate buffer should there be an additional requirement for housing in the Medway area, rather than relying heavily on delivering the target number of 28,500 homes.
- 7.6. In accordance with paragraph 69 of the NPPF, it is identified that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. It sets out that ‘to promote the development of a good mix of sites local planning authorities should:
- “a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare”;*
- 7.7. The site, could provide a reasonable alternative and an additional site on the outskirts of Hoo for additional housing development.

#### The Rural Development Areas

- 7.8. This representation **supports** paragraph 5.40 of the consultation, which sets out that the Hoo Peninsula provides a significant opportunity for the “*development for homes, jobs and services*”.

- 7.9. This representation **supports** the approach to utilise the Housing Infrastructure Fund (HIF) program to deliver improvements to transport and put measures in place to strengthen the local environment in the Hoo area.
- 7.10. In accordance with Paragraph 5.41 of the 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.

## 8. Summary

- 8.1. It is considered that the provision of housing development being delivered through rural development is supported. On this basis, the site provides an opportunity to deliver much-needed housing development within close proximity to the settlement of Hoo St Werburgh and without any identified constraints.
- 8.2. The site proposed for development at 1 Ropers Cottage (site HHH30), should be supported in the Stage 2 assessment having already been supported in the Land Allocations Assessments (LAA) document, as a potential site allocation in the Future Medway Local Plan 2040.