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MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE

Medway Submission ID: 1565

**Land south of Sundridge Hill, Cuxton, Kent
ME2 1LF**

CLIENT: Trevor Heathcote LLP



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Appendix 1 – Title Plan

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Appendix 3 – Southern Water Utilities Plan Proposed Site Layout

1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

- 1.1.1 This representation has been prepared on behalf of Trevor Heathcote LLP 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 putting a new Local Plan in place for the period 2022-2040 and seeks to provide certainty in the direction of Medway's growth.
- 1.1.2 For the avoidance of doubt, this representation document relates to Medway online submission ID: '**1565**'.
- 1.1.3 The consultation document does not specify a preferred strategy for growth, rather it provides options for growth set within the background of the identified housing requirement and the "Vision" and "Strategic Objectives" set by the Council. This representation is made within this context and responds to 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 addition, this representation continues to promote the availability of our client's site 'Land south of Sundridge Hill, Cuxton' for the allocation of either:
- 'Extension of an existing household waste and recycling centre site'*
- or;*
- 'Extension of an existing gypsy & traveller site'*
- 1.1.5 This representation serves to demonstrate that irrespective of the strategic spatial pattern of growth within Medway, the Local Plan will be required to ensure that the delivery of *circa.* 28,500 new homes and 62.3 hectares of employment land over the Plan period is adequately supported by the necessary accompanying infrastructure. In addition to schools, transport and green infrastructure, this must also include household waste and recycling centres, where the expansion of existing and creation of new sites will inevitably be required in order to serve the quantum of new growth proposed.
- 1.1.6 Separately, it is confirmed within the emerging Local Plan Housing Topic Paper that the provision of Gypsy, Traveller and Travelling Showpeople accommodation will be included within the district's overall housing need. It is understood that the

Council has commissioned a Gypsy and Traveller accommodation assessment to provide an updated evidence base for the new Local Plan, albeit at the time of writing this has not yet been published. It is however highly likely that additional or expanded sites will be necessary and it is submitted that our client's site represents a logical extension to an established adjacent site at Cuxton.

- 1.1.7 This representation demonstrates how the allocation of our client's site within the emerging Local Plan for either of the above uses, would positively contribute to meeting the draft Plan's strategic objectives and is a necessary component of any of the proposed spatial strategies for growth. For the reasons outlined within this representation, we submit that it is necessary for the spatial strategy for growth to be adequately supported by a robust scheme of supporting infrastructure allocations and gypsy and traveller accommodation sites, if it is to sustainably deliver the identified housing and employment requirements in full.
- 1.1.8 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" (National Planning Policy Framework 'NPPF', para 35).
- 1.1.9 For the avoidance of doubt, this representation document is intended to be read alongside the on-line form/platform submission which has been completed separately and refers to this document.

1.2 SUMMARY

- 1.2.1 As set out in full within this representation, the Local Plan must:
- Plan to meet its full objectively assessed housing need and include specialist accommodation for Gypsy, Traveller and Travelling Showpeople within the overall borough need. The Council has persistently under delivered against its housing requirement over the last 36 years, resulting in a significant need for all types of housing, including gypsy and traveller sites;
 - Ensure that the delivery of *circa.* 29,000 new homes and 62.3 hectares of employment land over the Plan period is adequately supported by the necessary accompanying infrastructure. This must include household waste and recycling centres, where the expansion of existing and creation of new sites will inevitably be required to serve the quantum of additional growth proposed.
 - Amend the "Vision" (para 3.1) to include an expanded reference to housing, incorporating specialist accommodation types and placing greater emphasis on the need for supporting infrastructure to serve the substantial quantum of residential and commercial growth proposed.
 - Amend the "Strategic Objectives" to include the need to deliver housing to meet identified needs, including specialist accommodation types such as

Gypsy, Traveller and Travelling Showpeople as an objective in its own right. The housing shortfall in Medway is significant and it is imperative that the new Plan is sufficiently ambitious in its strategy to ensure a robust and consistent supply of housing of all types throughout the Plan period. This is necessary in order to accord with the NPPF (para 20) which requires the inclusion of strategic policies which set out the overall strategy and pattern for spatial growth, including for the provision of housing and specialist accommodation. The "Strategic Objectives" can therefore not be silent on this matter.

- Amend the "Strategic Objectives" to explicitly state the need to robustly support the delivery of housing and employment growth within the Local Plan with adequate accompanying infrastructure, including additional facilities for the handling of household waste and recycling.

1.3 STRUCTURE OF THE DOCUMENT

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

- **Section 2** - Provides feedback on the overall vision of the Local Plan.
- **Section 3** - Provides commentary on the strategic objectives of the Local Plan.
- **Section 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.
- **Section 5** - Sets out the preferred spatial strategy and why this represents the most suitable and thus "Sound" option.
- **Section 6** - Provides an overview of the site promoted, setting out the reasons why the site should be considered for an allocation.
- **Section 7** - 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 understood 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 the necessary supporting infrastructure provision.
- 2.1.3 We note with concern however that the "Vision" is silent on its intention to meet its identified housing need or deliver the needs for specialist accommodation types. It is similarly vague on the requirement to robustly support the district's ambitious proposed growth with similarly substantial supporting infrastructure.
- 2.1.4 We therefore submit that the Vision statement should be updated, to make clearer the crucial requirement to supplement growth with the necessary supporting infrastructure of all types, including facilities such as household waste and recycling.
- 2.1.5 Moreover, whilst an emphasis on market and affordable housing delivery is inevitable, the Plan Vision should also include a greater emphasis on ensuring that there is certainty that specialist accommodation types will be delivered, through clear plan-led site allocations, including for Gypsy, Traveller and Travelling Showpeople sites.
- 2.1.6 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' and 'how this development will be supported by infrastructure' 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).
- 2.1.7 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.*

2.1.8 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.

2.1.9 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, supporting infrastructure and waste and minerals.

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

The Plan will seek to deliver at least 28,500 new homes and suitable specialist accommodation 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, waste 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, including specialist accommodation as an important component of the Plan (para 3.1) and neither sets out how much development should be provided for or explicitly addresses the need to support growth with a robust plan for supporting infrastructure. 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 or that it will be adequately supported by infrastructure, 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 specialist accommodation and supporting infrastructure and the accompanying text should be amended to include a commitment to the delivery of 28,500 new homes, specialist accommodation and infrastructure.

3 STRATEGIC OBJECTIVES

3.1 COMMENTS ON THE STRATEGIC OBJECTIVES

- 3.1.1 The consultation document sets out four strategic objectives to positively plan for the development and infrastructure needs of Medway whilst conserving and enhancing the natural, built and historic environment. The objectives are:
- Prepared for 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 are no strategic objectives committing to the delivery of housing, specialist or otherwise, or a firm commitment to the delivery of the supporting infrastructure that is required in order to adequately serve the substantial quantum of residential and employment growth that is being proposed.
- 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 or how it is to be supported by infrastructure such as schools, transport, waste facilities and open space. 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).
- 3.1.4 In the absence of clearly setting out what the housing requirement is and how its delivery is to be supported (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, including specialist accommodation which must reflect the objectively assessed need as a minimum (NPPF, para 11b) or a new objective added which identifies this. We additionally suggest that the provision of supporting infrastructure to serve the quantum of growth proposed is also made explicitly clear and a firm commitment made to its delivery in line with growth.
- 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 and supporting infrastructure to be planned for to 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.

- 3.1.7 More generally, the objectives also only refer to 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 this is a matter which is highly formative to the distribution of growth and the selection of housing sites and will have corresponding impacts upon the degree and nature of further supporting infrastructure required.

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 and fail to demonstrate a firm commitment to the delivery of either specialist accommodation or the substantial degree of supporting infrastructure that will be required to serve the district’s ambitious residential and employment growth targets. 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) and will include a robust strategy for the delivery of supporting infrastructure.

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 2008/09 and 2009/10. This has no doubt lead to the current acute shortage of housing of all types in Medway and the 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 |
| 1986/87- 2021/22 | 27,407 | 35,727 | -8,320 |

TABLE 3.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

- 4.1.4 It is additionally 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.
- 4.1.6 In addition to housing, it is recognised that the plan must include a strategy 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 the economic development strategy. The plan is understood 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.

4.2 SUPPORTING DEVELOPMENT INFRASTRUCTURE

- 4.2.1 It is evident from the above development needs that the spatial strategy contained within the emerging Local Plan will be required to facilitate a substantial quantum, of new residential and employment growth across the plan period.
- 4.2.2 Infrastructure is a vital component of the Local Plan as it is essential for a place to function well. Infrastructure planning is a key requirement of Government planning policy and its economic strategy. It encompasses transport, water supply, wastewater, energy, telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management.
- 4.2.3 It is essential that the substantial growth proposed is adequately supported by the necessary accompanying infrastructure. In addition to flagship schools, transport and green infrastructure, this must also include household waste and recycling centres, where the expansion of existing and creation of new sites will inevitably be required in order to serve the quantum of new growth proposed.
- 4.2.4 Infrastructure capacity is identified as a potential issue and/or constraint in all spatial strategy locations (Urban Regeneration / Suburban Expansion / Rural Development / Green Belt Release). The Council's infrastructure topic paper confirms at paragraph 10.4 that the Council has researched current infrastructure capacity and its ability to meet increased demand in line with the growth proposed in the new Local Plan. The Council has had discussions with infrastructure providers, such as utilities companies and transport bodies, as part of the plan preparation process. This work has shown that there are infrastructure deficiencies in many areas. The Local Plan is identified as a means of securing new and improved infrastructure and services, and policy interventions. Infrastructure provision current and future is additional recognised as core to assessing the suitability of proposed development locations to accommodate growth.
- 4.2.5 The Council will be producing an infrastructure delivery plan to sit alongside the Local Plan. It will identify the key infrastructure interventions needed to meet the required growth over the plan period. It is understood that this will be prepared ahead of the next stage of consultation. We therefore submit that the plan should include the delivery of household waste and recycling infrastructure as part of the delivery plan and should be prepared with regard to the proposed spatial strategy and locations for respective growth.
- 4.2.6 Taking account of the above, it is vital that the Local Plan includes a clear strategy for delivering additional and expanded infrastructure capacity in line with anticipated growth across the Plan period. This would be best achieved through the allocation of sites for infrastructure provision within the Plan, to provide greater certainty of their delivery and ensure a genuinely plan-led growth strategy whereby the location of housing and employment growth is clearly supported by a similar spatial strategy for coordinated infrastructure provision.

4.3 GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE SITES

- 4.3.1 It is confirmed within the emerging Local Plan Housing Topic Paper that the provision of Gypsy, Traveller and Travelling Showpeople accommodation will be included within the district's overall housing need.
- 4.3.2 At this stage of the plan-making process it is understood that the Council has commissioned a Gypsy and Traveller accommodation assessment to provide an updated evidence base for the new Local Plan, albeit at the time of writing this has not yet been published. Whilst the exact need is not yet clear, it is however highly likely that additional or expanded sites will be required to come forward across the Plan period.
- 4.3.3 At present, there are 16 gypsy and traveller sites and 1 travelling showperson site in Medway. These include one public site at Cuxton, managed by Medway Council, and a range of permanent and temporary private sites.
- 4.3.4 It is submitted that the established site at Cuxton represents a suitable location consistent with the Council's overarching development and sustainability strategy and benefits from capacity to expand to include land being promoted by our client.

4.4 SUMMARY

- 4.4.1 Overall it is clear that the spatial strategy contained within the emerging Local Plan will be required to facilitate a substantial quantum, of new residential and employment growth across the plan period.
- 4.4.2 Infrastructure is a vital component of the Local Plan as it is essential for a place to function well and it is essential that the substantial growth proposed is adequately supported by the necessary accompanying infrastructure. In addition to flagship schools, transport and green infrastructure, this must also include household waste and recycling centres, where the expansion of existing and creation of new sites will inevitably be required in order to serve the quantum of new growth proposed.
- 4.4.3 The Council will be producing an infrastructure delivery plan to sit alongside the Local Plan. It will identify the key infrastructure interventions needed to meet the required growth over the plan period. It is understood that this will be prepared ahead of the next stage of consultation. We therefore submit that the plan should include the delivery of household waste and recycling infrastructure as part of the delivery plan and should be prepared with regard to the proposed spatial strategy and locations for respective growth.
- 4.4.4 Separately, it is confirmed within the emerging Local Plan Housing Topic Paper that the provision of Gypsy, Traveller and Travelling Showpeople accommodation will be included within the district's overall housing need.
- 4.4.5 At this stage of the plan-making process it is understood that the Council has commissioned a Gypsy and Traveller accommodation assessment to provide an updated evidence base for the new Local Plan, albeit at the time of writing this

has not yet been published. Whilst the exact need is not yet clear, it is however highly likely that additional or expanded sites will be required to come forward across the Plan period.

5 PREFERRED SPATIAL STRATEGY

5.1 PREFERRED SPATIAL STRATEGY

- 5.1.1 As is evident from Table 1 of the consultation document, it is clear that no single development scenario in isolation supplies the quantum of homes and employment land required to meet the objectively assessed need, nor provides sufficient flexibility to ensure a robust and consistent supply of housing and economic delivery throughout the Plan period.
- 5.1.2 Therefore, whilst the consultation document seeks comment on a preferred development option, in our view there cannot be one single development option for growth, rather a combination of a number or indeed all of the suggested options will likely be required to ensure soundness of the Plan.
- 5.1.3 This representation considers that irrespective of the strategic spatial pattern of growth within Medway, the Local Plan will be required to ensure that the delivery of circa. 28,500 new homes and 62.3 hectares of employment land over the Plan period is adequately supported by the necessary accompanying infrastructure. In addition to schools, transport and green infrastructure, this must also include household waste and recycling centres, where the expansion of existing and creation of new sites will inevitably be required in order to serve the quantum of new growth proposed.
- 5.1.4 Separately, by virtue of the relatively small scale and unique nature of specialist accommodation types, they may not be easily delivered strictly in line with any particular spatial strategy. Rather, sites will need to be selected on an individual discretionary basis, according to individual site constraints and accommodation needs.
- 5.1.5 The provision of Gypsy, Traveller and Travelling Showpeople accommodation will be included within the district's overall housing need and whilst an updated Gypsy and Traveller accommodation assessment is being prepared, it has not yet been published, nor the likely figures yet released. It is however highly likely that additional or expanded sites will be necessary and it is submitted that as a starting point, opportunities to expand existing such sites represents the most logical source of accommodating the additional need for the Plan period, including our client's site at Cuxton.
- 5.1.6 Due to the nature of the proposed uses at land south of Sundridge Hill, Cuxton, our client does not feel it necessary to indicate any strong preference on a spatial growth strategy. Rather it is clear that the scale of residential and employment growth proposed is sufficient to justify the allocation of our client's site for either expanded household waste and recycling or Gypsy, Traveller and Travelling Showpeople within any of the proposed options.

5.2 SUMMARY

- 5.2.1 To meet the identified housing requirement in full and provide a robust and reliable source of consistent housing delivery throughout the plan period, sites will need to be allocated utilising a number of spatial strategy sources. However, our client's view is that the nature of the proposed uses at land south of Sundridge Hill, Cuxton is such that the allocation of our client's site for either expanded household waste and recycling or as a Gypsy, Traveller and Travelling Showpeople site is justified within any of the proposed options.
- 5.2.2 We suggest that the emerging Plan must allocated sites across the district for both infrastructure and Gypsy, Traveller and Travelling Showpeople irrespective of the spatial growth option proposed.
- 5.2.3 An overview of our client's available site land south of Sundridge Hill, Cuxton is provided in the following section, demonstrating how such a site would assist in the delivery of the growth requirements of the emerging Local Plan.

6 PROPOSED SITE FOR ALLOCATION

6.1 OVERVIEW OF ALLOCATION OPPORTUNITY

- 6.1.1 The submission site comprises two parcels of vacant land totalling 1.83ha located south of Sundridge Hill, Cuxton and accessed from the A228 'Sundridge Hill' (please refer to figure 6.1 below and **Appendix 1**).

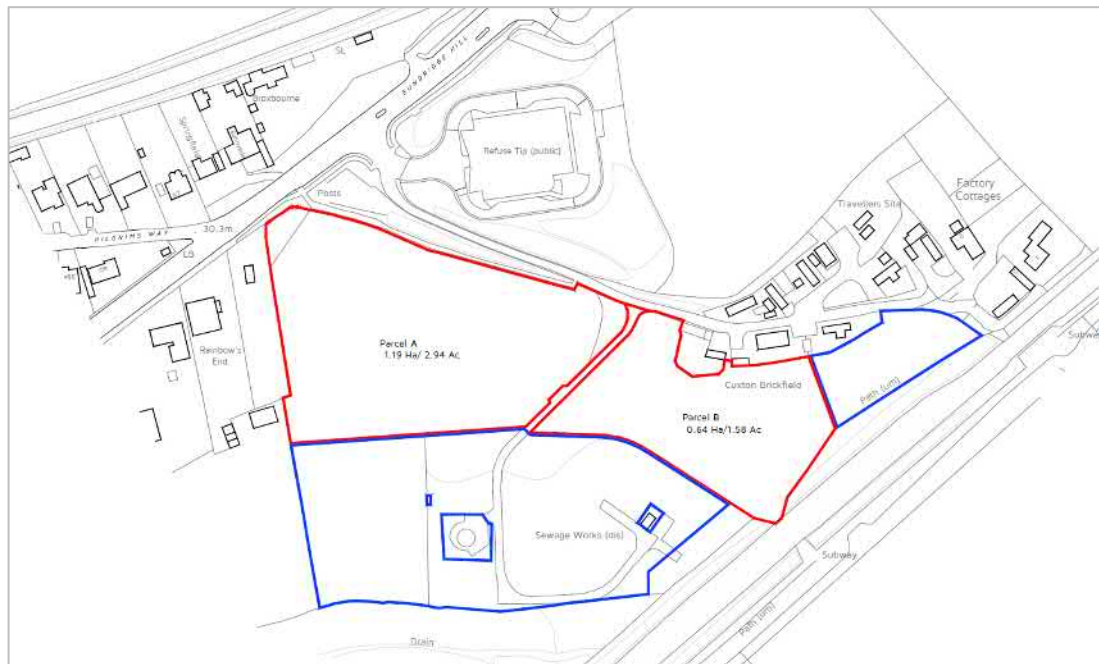


FIGURE 6.1: AERIAL SUBMISSION SITE OVERVIEW (GOOGLE EARTH)

- 6.1.2 The site is bound by the A228 to the north and the River Medway and Medway Valley Railway line to the south. The wider area comprises a varied mix of commercial, industrial and marine uses. To the immediate east of the site lies the Medway Council household waste and recycling centre and further south, a Council operated Gypsy and Traveller site.
- 6.1.3 In terms of wider planning constraints, the site is not subject to any strategic designations and there are not considered to be any absolute constraints to the development uses proposed.
- 6.1.4 The site forms a logically contained development location, suitable for expansion of either of the two proposed uses which already operate on the wider site and which are likely to require expansion.
- 6.1.5 This Local Plan submission seeks to promote the site for the allocation of either infrastructure or Gypsy, Traveller and Travelling Showpeople uses as part of any of the proposed growth strategies and will logically expand the existing uses of the wider site to serve the uplift growth strategy of the emerging Local Plan.

6.2 PROPOSED DEVELOPMENT

- 6.2.1 At this early stage, detailed plans have not yet been prepared and any future scheme would be subject to early and meaningful engagement with the local community and Medway Council.
- 6.2.2 However, it is anticipated that an extension to the existing household waste and recycling centre site can be delivered. Two potential options have been drawn up to show how the existing household waste and recycling centre site could be extended with an additional level platform of 6,000 sq. m.
- 6.2.3 In order to assist the Council, an indicative masterplan has been prepared for the to demonstrate how these options could be taken forward and is provided at **Appendix 2** of this representation.
- 6.2.4 Alternatively, the site is considered suitable to accommodate an expansion of the existing Gypsy, Traveller and Travelling Showpeople site at Cuxton.

6.3 SITE SPECIFIC JUSTIFICATION FOR ALLOCATION

Consistency with Spatial Growth Options

- 6.3.1 Development of the submission site would be consistent with any of the proposed Spatial Growth Options and would facilitate the delivery of the Local Plan's residential and employment growth requirements.
- 6.3.2 It is demonstrated that such sites are necessary irrespective of the strategic spatial pattern of growth within Medway. The Local Plan will be required to ensure that the delivery of circa. 28,500 new homes and 62.3 hectares of employment land over the Plan period and that this growth is adequately supported by the necessary accompanying infrastructure. In addition to schools, transport and green infrastructure, this must also include household waste and recycling centres, where the expansion of existing and creation of new sites will inevitably be required in order to serve the quantum of new growth proposed.
- 6.3.3 Separately, it is highly likely that the emerging Plan will be required to allocate sites across the district for Gypsy, Traveller and Travelling Showpeople irrespective of the spatial growth option proposed.
- 6.3.4 Given the clear consistency of our client's site with the growth strategies and the established nature of the wider site as a suitable location for either infrastructure or Gypsy, Traveller and Travelling Showpeople site uses, we submit that land south of Sundridge Hill, Cuxton should be allocated for development of either expanded household waste and recycling facilities or Gypsy, Traveller and Travelling Showpeople accommodation within the emerging Local Plan.

Sustainability

- 6.3.5 Development on this site would contribute to the achievement of sustainable development for the array of reasons set out within this representation and would

facilitate the necessary delivery of supporting infrastructure to serve the growth strategy of the Local Plan.

- 6.3.6 From a wider sustainability perspective, the proposal would not involve the loss of land that is of high agricultural or ecological value and would not comprise development in an area of high flood risk.

Ecology

From an ecological perspective, the site is not subject to any specific designations and any future scheme could be developed to provide ecological enhancement.

Landscape

- 6.3.7 The site comprises a naturally contained land parcel, characterised by its proximity to adjacent similar uses which typically require an edge-of-settlement location. Any future scheme would be reasonably expected to include additional landscaping and ecological enhancement measures such that it would not result in significant adverse landscape impact.

Heritage

- 6.3.8 The site is not located in close proximity to any heritage assets or Conservation Areas, nor is the site identified to be of any particular archaeological importance. There is therefore no basis upon which to resist development in this location from a heritage perspective.

Residential Amenity

- 6.3.9 By virtue of the site layout, separation distances and landscaping that could be incorporated, it is unlikely that the scheme would result in any adverse impacts on the amenity of nearby properties.

Flood Risk

- 6.3.10 The site lies entirely within Flood Zone 1 with no known risk of flooding. Likewise, the landowner is not aware of any local flood incidents that have impacted this area of Cuxton. There is therefore no basis upon which to resist growth in this location from a flood risk perspective.

Access and Highways

- 6.3.11 Access design and improvements if required remain at an early stage and details have not yet been finalised. However, at this early stage no absolute constraints with regards to access are anticipated and it is considered that suitable and safe access to serve the modelled capacity can be achieved.
- 6.3.12 Work by the project team on this site remains ongoing and it is expected that additional information will be provided as the emerging Local Plan progresses.

Deliverability

- 6.3.13 For the reasons set out in this representation, the site is considered suitable for two proposed uses comprising expanded infrastructure and Gypsy, Traveller and Travelling Showpeople accommodation. The site is adjacent two existing sites of the same use would form a natural and logical extension of either site and is demonstrated to be necessary in order to serve the substantial increasing growth patterns of the district within the emerging Plan period.
- 6.3.14 Expanded household waste and recycling development would make a significant contribution to the infrastructure delivery for the district, to support the proposed residential and employment growth strategy of the district.
- 6.3.15 Alternatively, the site is suitable to accommodate an expansion of the existing Gypsy, Traveller and Travelling Showpeople site at Cuxton in line with the recommendations of the Council's updated need assessment.
- 6.3.16 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination (please also refer to **Appendix 3**).
- 6.3.17 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period in line with the Council's growth trajectory.
- 6.3.18 The site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the Plan period. The site is therefore considered available and achievable for the purposes of the tests of deliverability.

6.4 SUMMARY

- 6.4.1 Our client is promoting two parcels of vacant land totalling 1.83ha located south of Sundridge Hill, Cuxton and accessed from the A228 'Sundridge Hill' for allocation within the emerging Local Plan.
- 6.4.2 This representation seeks to promote the site for the allocation of either infrastructure or Gypsy, Traveller and Travelling Showpeople uses as part of any of the proposed growth strategies and will logically expand the existing uses of the wider site to serve the uplift growth strategy of the emerging Local Plan.
- 6.4.3 Development of the site would be consistent with any of the proposed Spatial Growth Options and would facilitate the delivery of the Local Plan's residential and employment growth requirements.
- 6.4.4 It is demonstrated that such sites are necessary irrespective of the strategic spatial pattern of growth within Medway. The Local Plan will be required to ensure that the delivery of circa. 28,500 new homes and 62.3 hectares of employment land over the Plan period and that this growth is adequately supported by the necessary accompanying infrastructure. In addition to schools, transport and green infrastructure, this must also include household waste and recycling centres,

where the expansion of existing and creation of new sites will inevitably be required in order to serve the quantum of new growth proposed.

- 6.4.5 Separately, it is highly likely that the emerging Plan will be required to allocate sites across the district for Gypsy, Traveller and Travelling Showpeople irrespective of the spatial growth option proposed.
- 6.4.6 Given the clear consistency of our client's site with the growth strategies and the established nature of the wider site as a suitable location for either infrastructure or Gypsy, Traveller and Travelling Showpeople site uses, we submit that land south of Sundridge Hill, Cuxton should be allocated for development of either expanded household waste and recycling facilities or Gypsy, Traveller and Travelling Showpeople accommodation within the emerging Local Plan.
- 6.4.7 On behalf of the landowner, we submit that there are no known financial restrictions that would impact upon the viability of a future housing scheme or that would prohibit development coming forward within the early stages of the Plan period in line with the Council's growth trajectory.

7 CONCLUSION

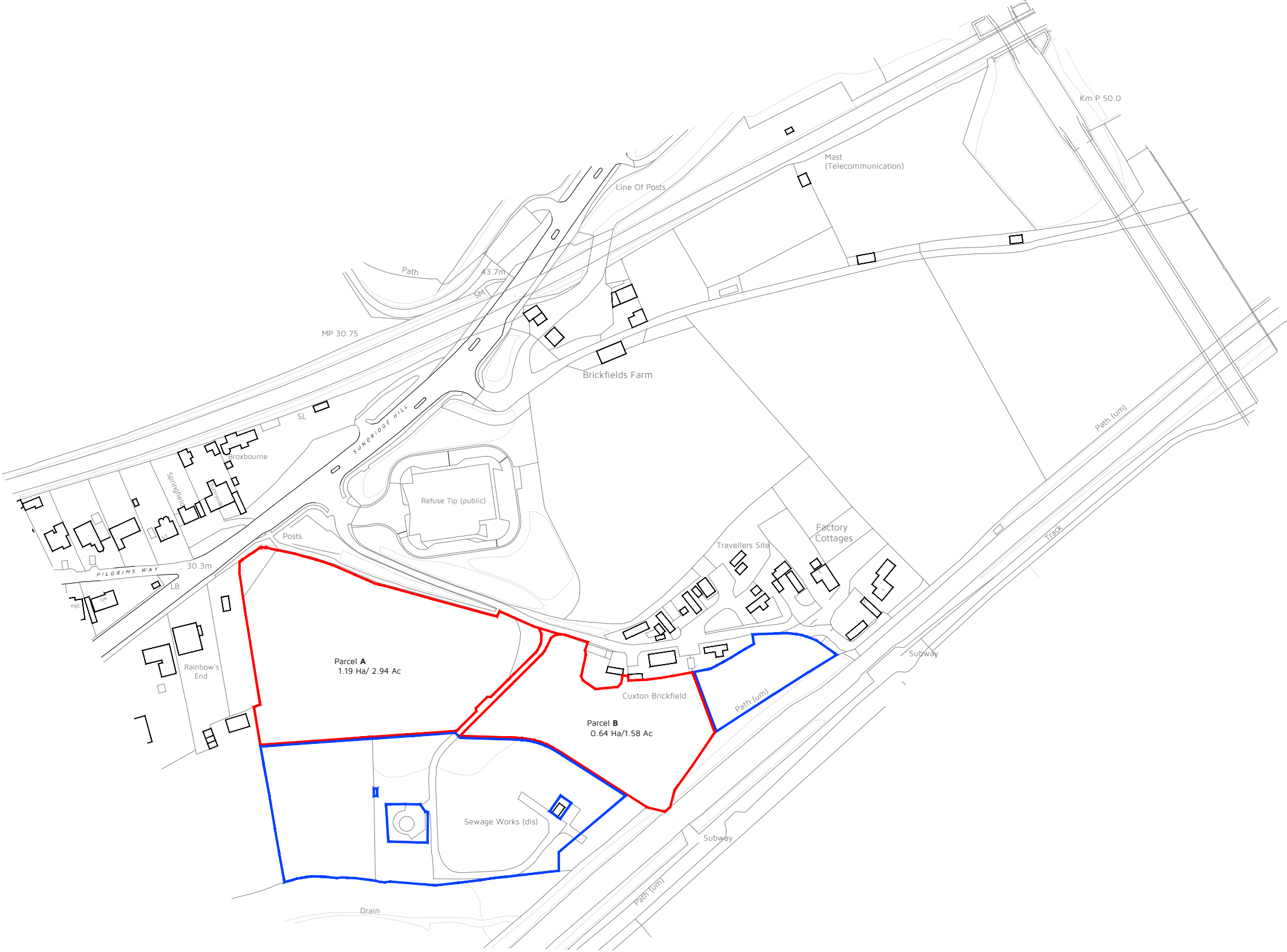
7.1 OVERALL SUMMARY

- 7.1.1 This representation has been prepared on behalf of Trevor Heathcote LLP 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 and seeks to provide certainty in the direction for Medway's growth.
- 7.1.2 Our client controls 'Land south of Sundridge Hill, Cuxton' and is promoting the site for allocation as either expanded household waste and recycling facilities or expanded Gypsy, Traveller and Travelling Showpeople as part of the emerging Local Plan process.
- 7.1.3 Given the clear consistency and necessary role of our client's site with any of the growth strategies put forward and the established nature of the wider site as a suitable location for waste and recycling and Gypsy and Traveller accommodation, we submit that the land promoted south of Sundridge Hill in Cuxton should be included as a either a future infrastructure or Gypsy, Traveller and Travelling Showpeople site allocation and continue to form part of the Council's evidence base used to inform the emerging Local Plan.
- 7.1.4 In addition to being sustainable, the site is deliverable in a single land ownership with no viability issues, legal or third-party constraints present and there are no impediments to the site being allocated for development commencing within the initial 0-5 year phase of the Plan period in line with the Council's wider residential and employment growth trajectory.

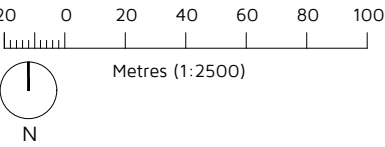
APPENDIX

1







Call For Sites Plan
1:2500 @ A3



Site Area: 1.85 Ha/ 4.57 Ac

-  Site put forward for Call for Sites Process
-  Land also within client ownership

| | | | |
|--------------------------|---------|------------------|---|
| Rev: | Reason: | Date: | Client: FGS AGRI LTD |
| | | | Project: LAND SOUTH OF SUNDRIDGE HILL, CUXTON, ROCHESTER, ME2 1LB |
| | | | Title: CALL FOR SITES PLAN |
| Drawing: DHA/30367/01 | Rev: | Scale: 1:2500 | Date: JAN 2023 |



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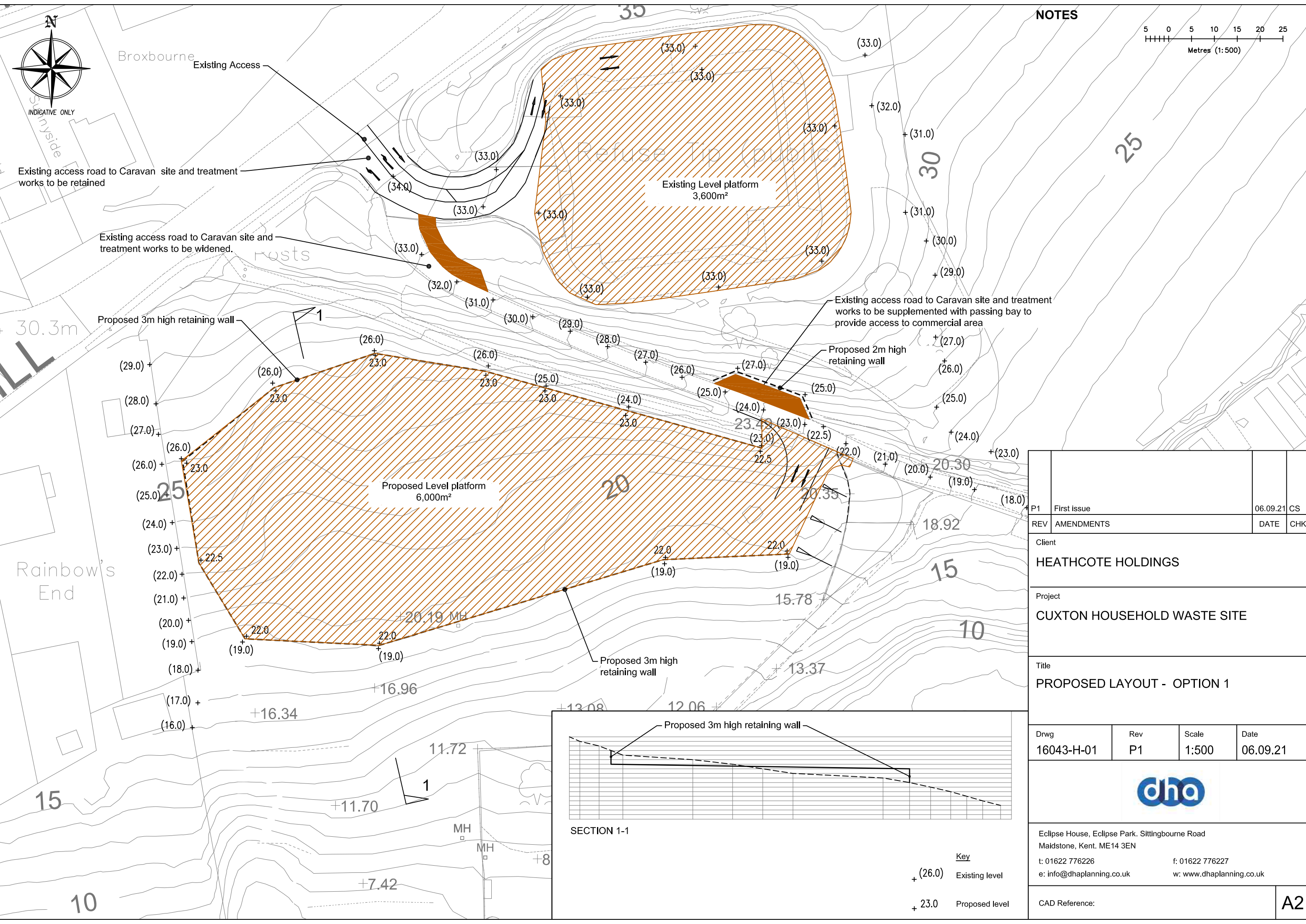
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APPENDIX

2



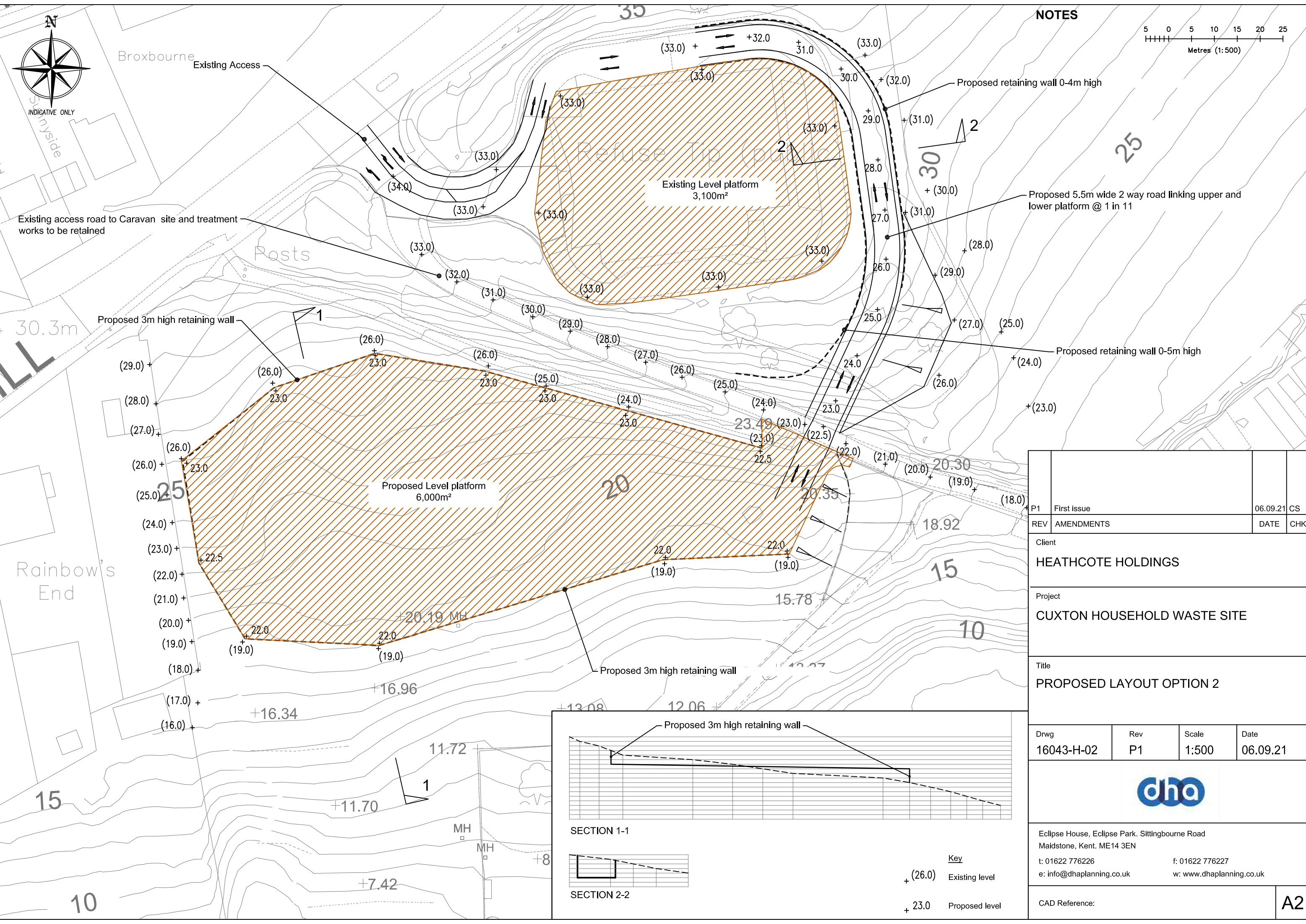


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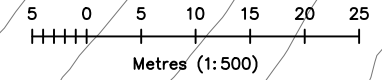
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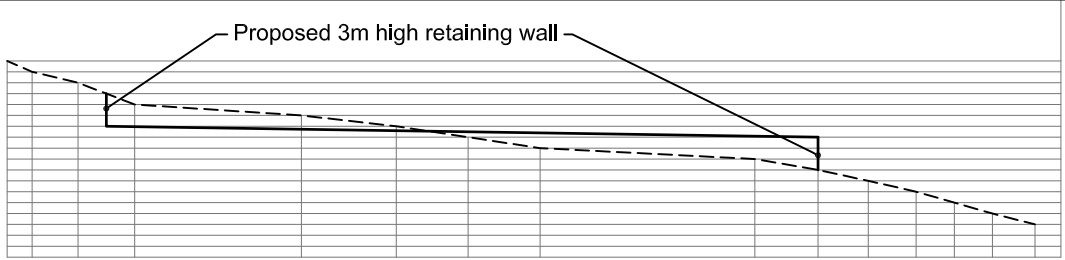
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| REV | AMENDMENTS | DATE | CHK |
| Client HEATHCOTE HOLDINGS | | | |
| Project CUXTON HOUSEHOLD WASTE SITE | | | |
| Title PROPOSED LAYOUT - OPTION 1 | | | |
| Drwg 16043-H-01 | Rev P1 | Scale 1:500 | Date 06.09.21 |
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| CAD Reference: | | | A2 |



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| P1 | First issue | 06.09.21 | CS |
| REV | AMENDMENTS | DATE | CHK |
| Client HEATHCOTE HOLDINGS | | | |
| Project CUXTON HOUSEHOLD WASTE SITE | | | |
| Title PROPOSED LAYOUT OPTION 2 | | | |
| Drwg 16043-H-02 | Rev P1 | Scale 1:500 | Date 06.09.21 |
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SECTION 1-1



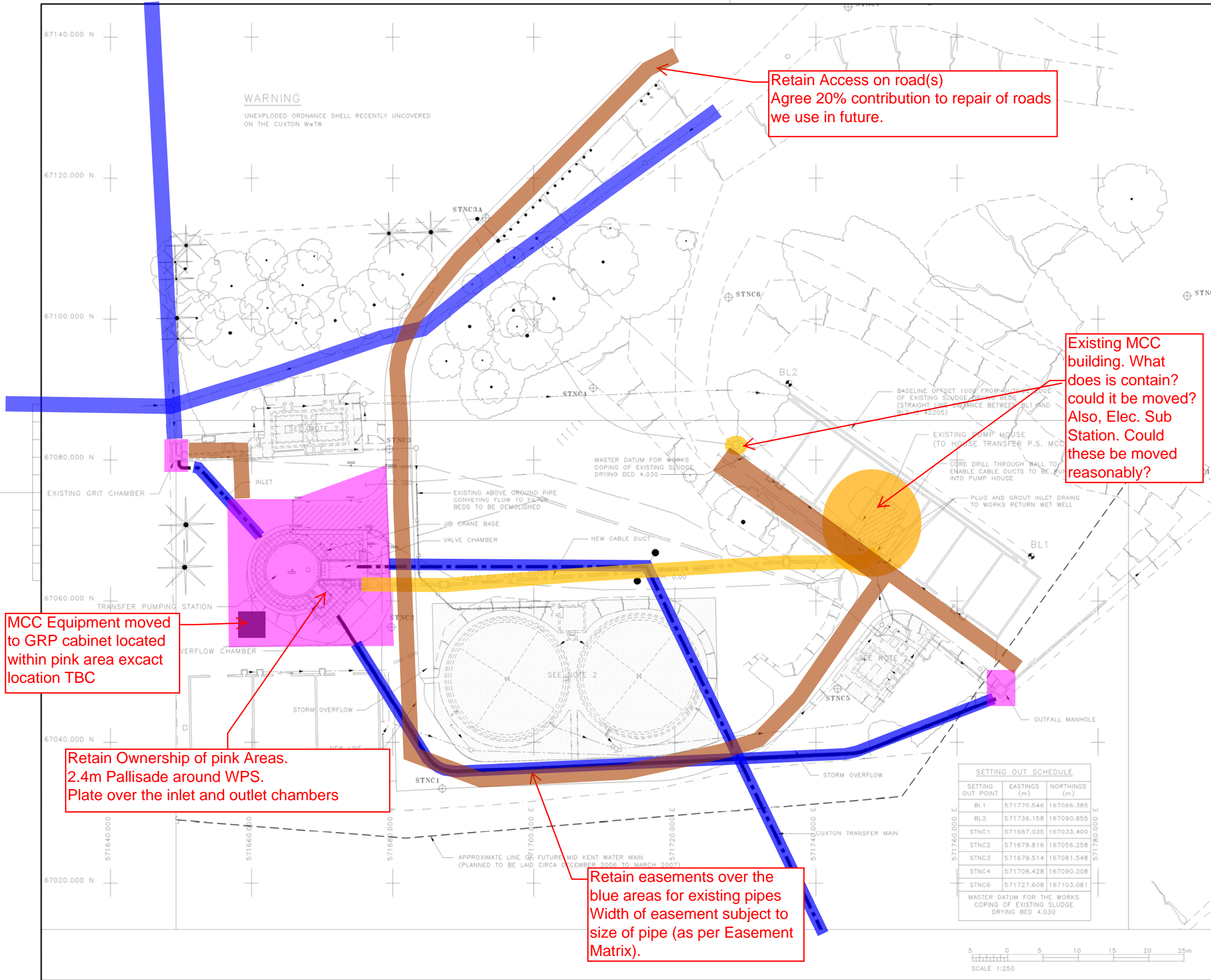
SECTION 2-2

- Key
- + (26.0) Existing level
 - + 23.0 Proposed level

APPENDIX

3





BZ.44111.11005

D

NOTES

- ALL DIMENSIONS IN MILLIMETRES AND ALL LEVELS IN METRES UNLESS SHOWN OTHERWISE.
- BASES TO EXISTING STRUCTURES TO BE PUNCTURED AND INFILLED WITH COMPACTED CLINKER. TOPS OF WALLS TO BE BROKEN DOWN 300 BELOW FINISHED GROUND LEVEL AND AREA GRADED OVER WITH SELECTED AS DUG MATERIAL, TOPSOILED AND SEEDED. FINISHED GROUND LEVEL TO BLEND IN WITH EXISTING GROUND LEVELS.
- EXISTING SITE MANHOLES TO BE INFILLED. TOPS OF MANHOLES SHALL BE BROKEN DOWN TO 300 BELOW FINISHED GROUND LEVEL.
- FOR DETAILS OF STRUCTURES AND TRANSFER MAIN REFER TO THE FOLLOWING DRAWINGS:-
TRANSFER PUMPING STATION, STORM OVERFLOW CHAMBER VALVE CHAMBER - DRG. No. BZ.44111.12001 TO 12006
TRANSFER MAIN - DRG. No. BZ.44111.12100 TO 12109

AS BUILT DRAWING

LEGEND

- ACCESS BAY
- AREA TO BE TOPSOILED AND SEEDED
- CONCRETE FOOTPATH

CURRENT ISSUE INFORMATION

| DATE | VG | DP | DP | D | AS BUILT |
|----------|----|----|------|----|------------------------------|
| 15.02.08 | VG | DP | DP | D | AS BUILT |
| 30.01.08 | VG | RR | DP | C | ISSUED FOR AS-BUILT APPROVAL |
| 11.01.07 | CN | DP | DB/D | B | ISSUED FOR CONSTRUCTION |
| 17.11.06 | CN | DP | DB | B1 | ISSUED FOR APPROVAL |

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ORIGINATORS DRAWING NO.

SWK401-MC-3111-CV-DW-11005

ISSUE

D1

PROJECT TITLE

CUXTON TRANSFER

DRAWING TITLE

CUXTON TRANSFER PUMPING STATION
PROPOSED SITE LAYOUT

SITE UNIT
NUMBER

CUXTONXX

SITE UNIT
NO.

100205

PRJ. NO.

44111

SCALE

1:250

MASTER
SIZE

A1

S.W. DRAWING NO.

BZ.44111.11005

REVISION

D

planning
transport
design
environment
infrastructure
land

MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE

Veetee's 3 Sites, Medway City Estate

LAA REF: SR30, SR31 and SR37
OPUS SUBMISSION FORM REF: 222,233,234
RESPONDENT ID REF: 394
REGULATION 18 SUBMISSION ID: ID: 1598

CLIENT: VEETEE

OCTOBER 2023
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Appendix 1 – Vision Document by Assael

1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

- 1.1.1 These representations have been prepared on behalf of Veetee in response to Medway Council's '*Setting the direction for Medway 2040*' Regulation 18 Local Plan consultation 2023. The consultation is a statement of the Council's commitment in getting a new Local Plan in place for the period 2022-2040 (18 yrs) and seeks to provide certainty in the direction for Medway's growth.
- 1.1.2 The consultation document is very high level and does not include any preferred strategy for growth but provides options for growth set within the background of the identified housing requirement, the "Vision" and "Strategic Objectives" set by the Council. These representations are made within this context and answer the following key questions:
- 1) Do you have any comments about the proposed vision?
 - 2) Do you have any comments about the proposed strategic objectives?
 - 3) Do you have any comments about the considerations in developing the spatial strategy?
 - 4) Do you have any comments about the interim Land Availability Assessment?
- 1.1.3 In answering the above questions, it has been further demonstrated how the 3 Veetee Sites (**Site Refs SR30, 31 and 37**) on the Medway City Estate and the vision to develop the wider Medway City Estate 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 and the Veetee's Vision document for the Medway City Estate (**Appendix 1**)

1.2 SUMMARY

1.2.1 As set out in full in these representations, 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 yrs, 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 (3 Veetee’s sites, Medway City Estate) setting out the reasons why the sites should be considered for an allocation for residential lead development;

- **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 7th 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 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 provision and the supporting text amended to include reference to the delivery of 28,312 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 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 (housing and employment) 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 talk about development on brownfield land as part of the ongoing benefits of Medway's regeneration set out at objective 4 (Boost Pride in Medway through quality and resilient development). 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 include 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.
- 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, 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). 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.

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 per annum (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 |
| 1986/87- 2021/22 | 27,407 | 35,727 | -8,320 |

TABLE 3.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

- 4.1.4 It is noted that Gravesham Borough Council through its previous Regulation 18 consultation asked Medway to take 2,000 homes to assist it in meeting its housing need. Therefore, it is even more pressing that 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 Paragraph 5.3 of 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 Frinsbury, Cliffe 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 refer 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 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 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.

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

- 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 some of this proposed 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;
 - 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 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.
- 4.2.16 However, there are still opportunities for urban regeneration sites to come forwards. Sites within the Medway City Estate are considered to be sustainable locations and provide opportunities for residential led mixed-use communities on the Medway Peninsula given its strategic location between Strood and Rochester and known pipeline development sites.

- 4.2.17 Given brownfield delivery rates and viability concerns over some sites it is increasingly important that Medway maximise the new Urban Regeneration opportunities through the plan period through the allocation of additional site to those currently allocated but not yet built out. It is acknowledged that the delivery rates of brownfield sites are slower than Greenfield sites so it is anticipated that many of the larger urban regeneration sites such as those within the Medway City Estate may not start delivering a significant number of units required to meet the need until the middle to end of the plan period and into a subsequent plan period. Thus, there still need to be consideration of other strategic development options.

Suburban growth

- 4.2.18 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
- 4.2.19 Taking the above into account, it is considered at least 3,123 homes can be discounted from the potential supply of housing. Therefore, it is essential that Medway maximise the development potential of other strategic development options to help deliver the housing supply needed on the most sustainable sites.

Rural Development

- 4.2.20 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 centered around the settlements of Chatterden, Cliffe, Cliffe Woods, Allhallows, Hoo St Werburgh High Hailstow, Lower Stoke and the Isle of Grain.
- 4.2.21 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.

4.2.22 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

- 4.2.23 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.
- 4.2.24 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 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.

| 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 |
| Total potential supply | 38,216 | 27,674 | 10,182 |

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 THE SITE – 3 VEETEE’S SITES, MEDWAY CITY ESTATE

5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

Background

- 5.1.1 This Regulation 18 Local Plan representation responds to the published Regulation 18 consultation document as well as the evidence bases of the emerging Local Plan that have been carried forwards from previous Reg 18 Local Plan consultations. With the above in mind eight years have passed since the Employment Land Needs Assessment (ELNA) was completed by the Council (December 2015). The ELNA identifies the Medway City Estate as a strong business park which is a significant regional and local employment location, with the City Estate seen as providing a strong cluster of industrial and light industrial use, as well as some good office stock, with generally high occupancy levels. However, that is set within that Assessment against the context that the performance of the Estate is 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.
- 5.1.2 The ELNA specifically identifies Veetee as one of the key employers within the Estate. The recommendation of the ELNA in 2015 was to protect and enhance office space and to protect and maintain industrial, wharf and specialist industry use on the Medway City Estate peninsula.
- 5.1.3 Veetee has taken available opportunities to expand and develop their facilities on each of its 3 sites and continues to explore ways to continue to use those sites to service its growing customer base and order book. However, operating from 3 separate sites continues to create logistical and operational issues for the company including the limited capacity for intensification and expansion and peak hour traffic issues identified in the ELNA (2015) meaning that Veetee is looking to relocate.
- 5.1.4 Veetee considers it important to remain within Medway and has therefore been seeking to identify opportunities in the local area for them to relocate to a purpose-built facility with good transport links. The Kingsnorth and London Medway Commercial Park at Hoo provides one such relocation opportunity which is currently being explored.
- 5.1.5 Given the conclusions of the ELNA (2015) and the issues with the capacity and the local highway network within the Estate it is appropriate for Medway Council to consider and review the function of the Medway City Estate and what it can deliver

for Medway in the future with the development of the Kingsnorth and London Medway Commercial Park at Hoo and other sites around the Isle of Grain.

The Opportunity

- 5.1.6 The 3 Sites (**Site Refs SR30,31,37**) represent an opportunity for Veetee to address a current production issue by relocating to a new facility to the Hoo Peninsula. A relocation will allow the 3 sites in the Medway City Estate to come forwards for residential mixed use led development on brownfield land in a sustainable location with the site circa 1.5km from Strood train station and 2km from Strood high street.
- 5.1.7 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.
- 5.1.8 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 north west 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.
- 5.1.9 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.
- 5.1.10 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.
- 5.1.11 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).

- 5.1.12 Therefore, it is evident that additional housing need will be required to be provided in the other 3 spatial options including through urban regeneration strategies. There are sites within the Medway City Estate which are being promoted through the Local Plan process as being available for development within the Plan period, which include the three Veetee sites. The emerging Local Plan has the ability, by allocating sites or areas within the Medway City Estate to support the transition of the estate to a residential led mixed used development within the urban area which has the ability to make an important contribution to meeting Medway's housing need within that plan period.
- 5.1.13 The sections below identify the opportunities and capacity of the 3 sites individually as well as the vision for the Medway City Estate.

Site 1 Ref SR37

- 5.1.14 Site 1 provides an opportunity for the redevelopment of the site for residential units. The site is 1.9 ha in size and is with flood zone 1 and 2. To the north of the site is a training centre, car parts store and Tressair; to the west is a wholesaler; and to the south is a marine broker, tile shop, car body shop and chartered accountant, amongst others. The site is identified as having the capacity to deliver:
- circa 500 residential units (a mix of 1-4 beds);
 - opportunities for 3 to 10 storeys of development;
 - Opportunities for public link to the river Medway;
 - Opportunities to provide a riverside walkway;
 - Opportunities to increase the permeability legibility the Medway city estate;
 - Opportunities for new public green spaces; and
 - Enhancement of views in and out of the conservation areas to the south east of the site on the other side of the river Medway.



FIGURE 5.1.1 SITE 1 OPPORTUNITIES PLAN

5.1.15 Figure 5.1.2 below provides an illustrative masterplan of how site one could come forward.



FIGURE 5.1.2 ILLUSTRATIVE MASTERPLAN OF SITE 1

Site 2 Ref SR31

5.1.16 Site two is situated on the western edge of the Medway City Estate fronting the river Medway comprising of 1.4 ha of land. There are several buildings on site that relate to the Veetee business, this includes a brick-built building which could be

retained at the site. The site, however, lies Flood zone 3 and has a high risk of flooding. Considering the above the site has the potential to deliver the following:

- A landmark/tall building, circa 300-400 units;
- Active ground floor potential for commercial type uses;
- Riverside walk opportunities;
- Opportunities to increase the permeability of the site;
- Opportunities for new public green spaces;

5.1.17 Figure 5.1.3 below provides a Figure 5.1.4 provides an illustrative sketch of how the site could come forward once built out.



FIGURE 5.1.3 SITE 2 OPORTUNITIES

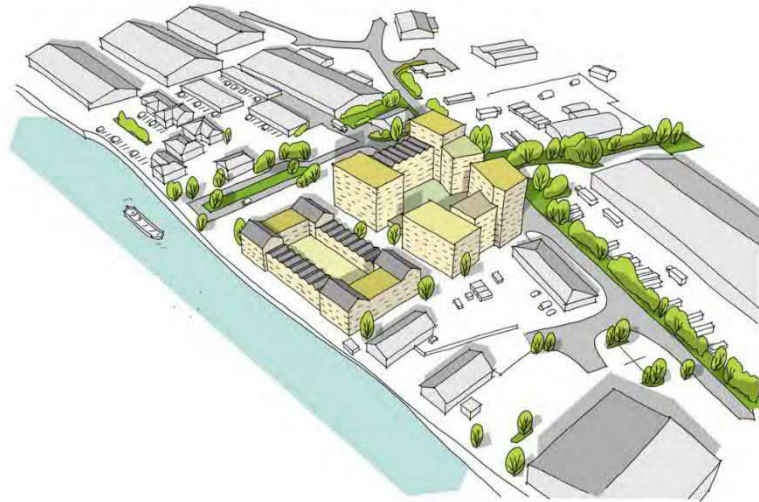


FIGURE 5.1.4 ILLUSTRATIVE MASTERPLAN OF SITE 2

Site 3 Ref SR30

5.1.18 Site 3 comprises 0.6 ha of land. The site is surrounded by a garden centre, mechanics and tile centre. Existing Industrial structures at the site could be retrofitted for future development was suitable employment uses. Alternatively, the site could be fully redeveloped for residential lead mixed-use development comprising circa 150 units and up to 470 m² of commercial space at ground floor level. As with site 1 and 2 the site has opportunities to provide the following:

- Active ground floor potential for commercial type uses;
- Riverside walk opportunities;
- Opportunities to increase the permeability of the site;

5.1.19 The site is constrained by the Flood zone 2 and neighbouring industrial uses and noise from the main road through the Medway City Estate. Therefore, noise and flooding are issues, but can be resolved through appropriate mitigation measures. Figures 5.1.5 and 5.1.6 below show the opportunities and constraints as well as an illustrative masterplan of how the site could come forward for development.

- Key
- Site boundary
 - Sun path
 - Existing site access
 - Existing pedestrian route
 - Existing vehicular route
 - Existing bus stop
 - Main road
 - Noise from main road
 - Flood zone 2
 - Emerging industrial scheme
 - Opportunity for active ground floor
 - Opportunity for height



FIGURE 5.1.5 SITE TO OPPORTUNITIES AND CONSTRAINTS

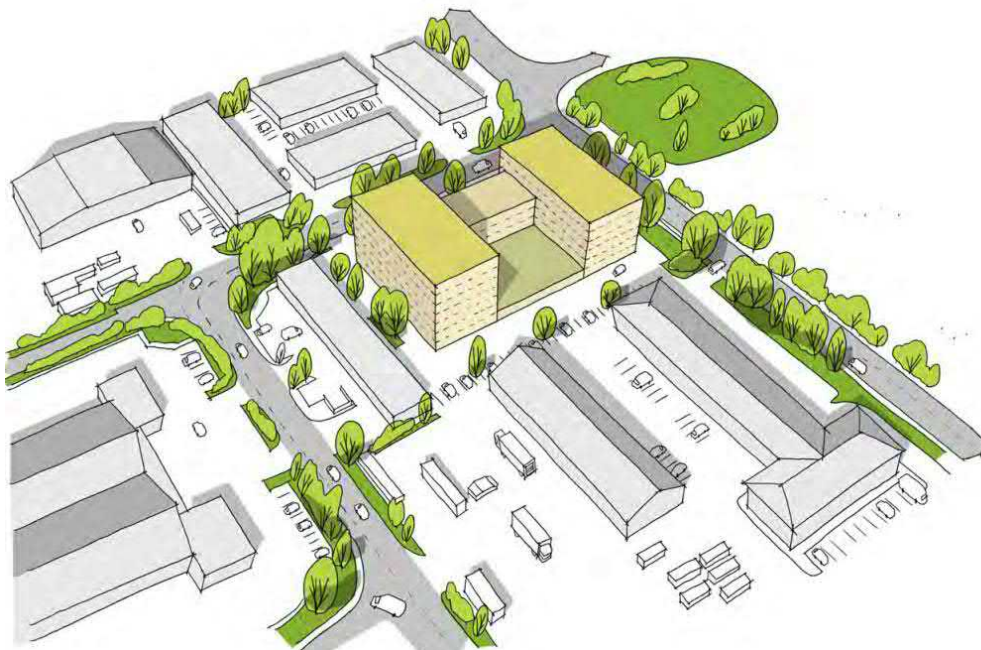


FIGURE 5.1.6 ILLUSTRATIVE MASTERPLAN OF SITE 3

Summary

- 5.1.20 The 3 Veetee sites have the capacity to deliver in excess of 1,000 residential units and circa 1,000 square metres of commercial floorspace providing opportunities for residential development in the Medway city estate within a location that is considered to be sustainable and in good proximity to local services and transport networks, with Medway an identified pipeline of development through the emerging local plan.

5.2 WIDER VISION FOR THE MEDWAY CITY ESTATE

- 5.2.1 The accompanying Vision Document by Assael (**Appendix1**) illustrates how the 3 Veetee sites could become a catalyst for the regeneration of all the Medway City Estate in the coming years to become an area which continues to contribute employment floorspace and job creation whilst providing a significant amount of housing within the centre of Medway and creating new links and connections to the areas around the peninsula. Thus, the Regulation 18 consultation provides an opportunity to strategically consider the role of the Medway City Estate within the Medway Towns as a sustainable new community connecting development in Medway's pipeline and other urban regeneration proposal sites (See Figure 5.2.1 below).

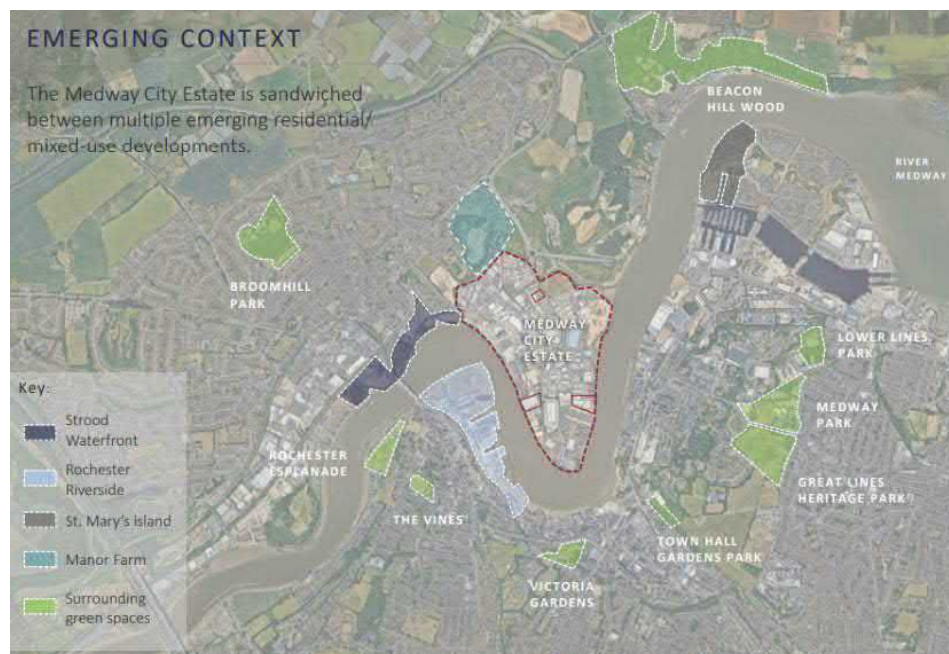


FIGURE 5.2.1 EMERGING CONTEXT FOR THE DEVELOPMENT OF THE VEETEE'S SITES

5.2.2 With the removal of the HIF funding for the Hoo Peninsula there is uncertainty over the deliverability of the 5,000 dwellings proposed being brought forward through the formally known Hoo development framework. This has provided an opportunity for the wider consideration for the evolution of the Medway City Estate peninsula to create the mixed-use community envisaged in the accompanying Vision Document (**Appendix 1**) delivering beyond the number of units currently proposed on the Eastate identified in the LAA making up for the shortfall of homes from the lack of delivery of homes on Hoo peninsula. Therefore, the 'wider vision for the Medway City Estate Peninsula' includes the point summarised below and shown in Figure 5.2.2.

- Extend Road network to utilise the peninsula better.
- Provide additional walkways along the river frontage.
- Potentials to provide urban greening within the heart of the Medway city estate.
- Potential pedestrian and cycle links across the peninsula to Rochester Riverside and Chatham.
- Improve the visual impact of development on the existing peninsula from neighbouring developments. And

- provide a focal point for residential lead development connecting to existing and emerging urban regeneration sites creating a holistic approach to urban regeneration within the Medway Towns.

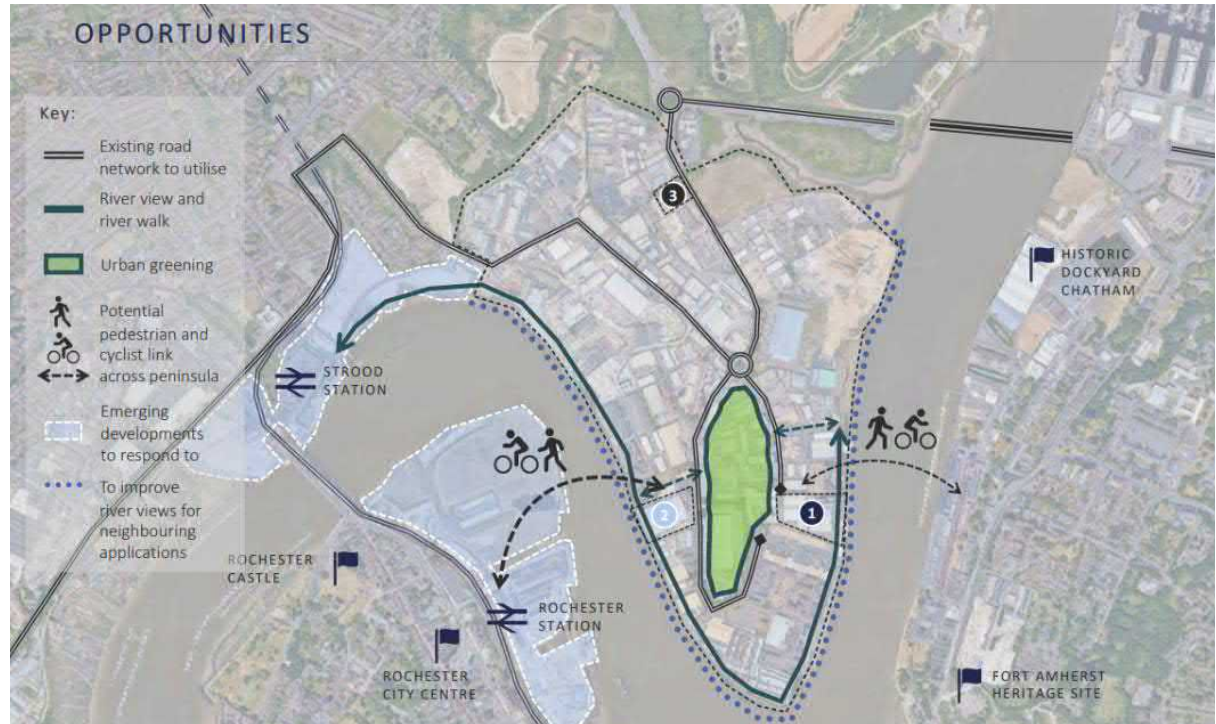


FIGURE 5.2.2 OPPORTUNITIES FOR THE REDEVELOPMENT OF THE VETTEE'S SITES IN THE MEDWAY CITY ESTATE

- 5.2.3 An Illustrative Masterplan Figure 5.2. shows how the 'wider vision' development could present itself providing 5-character zones for development. These are an industrial zone, innovation zone, education zone, residential zone and Central Park and Riverwalk with the Veetee's sites as the catalyst for the development of the peninsula.



FIGURE 5.2.3 ILLUSTRATIVE MASTERPLAN CHARACTER ZONES FOR THE WIDER VISION

- 5.2.4 From previous discussions with Medway Council in February 2023 they note the the current complexities present within the Estate over land ownership and whether development would be achievable in the short term (years 1-5 of the plan), and therefore question the appropriateness of an allocation being included in the current emerging Local Plan.

- 5.2.5 However, it is noted that with other urban regeneration sites at Peal Holding at Chatham Docks have previously formed part of Medway's strategy to deliver development. Against that context, it is submitted that the ability of the Medway City Estate to deliver housing and new mixed-use development during the next Plan period should not be discounted in the mid to late part of the plan period, as it represents a deliverable and realistic opportunity to provide the necessary growth within the plan period.
- 5.2.6 The preparation by the Council of a Masterplan Document, similar to the drafts produced for the Strood, Chatham and Gillingham Town Centres as part of the preparation of the emerging Local Plan, could provide (as those documents do) a vision, spatial and design priorities and phasing and delivery strategy for the area. That would create a structure under which individual proposals would proceed and a method for addressing the fragmented land ownership of the estate and the feasibility and viability work which would be required.

5.3 OTHER CONSIDERATIONS

Public Rights of Way

- 5.3.1 There are know known Public Rights of Way that affect Veetee's Sites or the wider Medway City Estate masterplan.

Flood Risk

- 5.3.2 The Site 1 lies within Flood Zone 1 and is therefore not at risk of flooding. Sites 2 and 3 lie within Flood Zone 2 and 3 and are at higher risk of flooding. Mitigation measures such as the height of ground floor levels of dwellings and or habitable living accommodation can be specified in any Strategic Planning Policy that looks to Allocate the sites for residential led mix use development in the emerging Local Plan.

Contamination

- 5.3.3 The 3 Veetee sites are brownfield sites that are currently used for B2 and B8 uses (Processing, Cooking and Storage). Whilst it is not yet known given the uses on the site there is potential for contamination to be present on the site that may require mitigation. Contamination mitigation measure can be overcome and are therefore, not considered an unacceptable barrier that would constrain development the development coming forwards.

Archaeology and heritage

- 5.3.4 There are no heritage assets with or adjacent to the application site. Given the scale, mass and potential height of the development illustrated in the masterplans for the 3 sites and the Wider Medway City Estate Vision given the location of the peninsula on the edge of the river Medway the location would be visible from Conservation Areas on the southern bank of the river and from locations such as Rochester Riverside and Rochester Castle. Any proposed planning policy which allocates the site could/ should ensure that landscape and visual impact assessments are required if the site is to come forward to ensure the development would not unacceptably impact and heritage assets within the wider area.
- 5.3.5 The site is not known to have a presence for archaeology. Mitigation measures and or a watching brief for any potential archaeological finds can be secured by condition if the Council consider this appropriate at any future planning application stage of development.
- 5.3.6 As such the Sites are not considered to be in a proximity to heritage assets that would cause any harm that could not be mitigated again through the wording of an appropriate planning policy relating to a potential allocation of the site.

Deliverability

- 5.3.7 For sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.

Availability

- 5.3.8 Availability is essentially about confirming that it is financially viable to develop, and viability remains a central consideration throughout plan-making. The 3 sites are reliant on Veetee's finding and securing an alternative site at either The Kingsnorth and London Medway Commercial Park at Hoo or another location in Medway to allow the sites to come forward for redevelopment and to be the Catalyst for a mixed-use community on the Medway City Estate Peninsula
- 5.3.9 The preparation by the Council of a Masterplan Document, similar to the drafts produced for the Strood, Chatham and Gillingham Town Centres as part of the preparation of the emerging Local Plan, could provide (as those documents do) a vision, spatial and design priorities and phasing and delivery strategy for the area. That would create a structure under which individual proposals would proceed and a method for addressing the fragmented land ownership of the estate and the feasibility and viability work that would be necessary to bring forward an appropriately structured strategic development of the peninsula.

- 5.3.10 Given the nature of the site and its availability along with the wider Medway City Estate it is considered that the circa 1,000 dwelling and employment space would start to be delivered in the 2030's in the mid to later years of the plan period.

Suitability

- 5.3.11 For reasons set out in this the representation sites are considered a suitable and sustainable location for development providing brownfield sites to deliver housing need.
- 5.3.12 Residential development on this site would make an important contribution to the required housing supply for the plan period for Medway given that it needs to meet the needs of Gravesham Borough Council and the deliverability issues of delivering the 5,000 homes that would be part of the Hoo development framework and sustainability concerns over other rural development sites in Medway.

Achievability

- 5.3.13 The 3 Veetee sites are brownfield sites under one ownership. However, the sites rely on Veetee's finding other operational sites for their business to release the land for redevelopment, albeit with Veetee having a clear intention to relocate in order to consolidate their operations into a single site and seeking to remain in the Medway Towns. Therefore, the redevelopment of the sites could start delivering development in the mid to late years of the plan period.
- 5.3.14 The fragmented land ownership of the wider Medway City Estate means that the achievability of delivering the wider Vision for the peninsula would be achievable for the later years of the plan period if the Council could provide a vision, spatial and design priorities as part of a Masterplan for the area in the emerging Local Plan, including a phasing and delivery strategy for the area. This would create a structure under which individual proposals would proceed and a method for addressing the fragmented land ownership of the estate and the feasibility and viability work that would be necessary to bring forward an appropriately structured strategic development of the peninsula.

5.4 SUMMARY

- 5.4.1 The sites promoted through these representations are on brownfield/previously developed land which would make the most effective use of land in accordance with paragraph 119 of the NPPF.
- 5.4.2 Given the location of the 3 Veetee's sites and the Medway City Eastates within the existing Urban Area of Medway with the 3 sites and a number of others identified

in the Stage 1 LAA for urban regeneration the peninsula is considered a deliverable and viable option for residential-led urban regeneration providing a new sustainable community with the ability to deliver the need for housing with the concerns over the viability and deliverability of rural settlement expansion on the Hoo Peninsula and the Hoo development framework due to the loss of HIF funding and the complex viability issues surrounding other smaller urban regeneration sites.

6 PREFERRED SPATIAL STRATEGY

6.1 PREFERRED SPATIAL STRATEGY

- 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 Sites at Section 5, 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.

Option 1 - Urban Regeneration

- 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 stated under section 4, there are concerns raised regarding the deliverability of many of these sites. Given the availability and deliverability scenarios around brownfield land it is understood that such sites would make up a significant component of the housing land supply after the first 5 years because of the complexities involved with such sites coming forward.

Option 2 - Suburban Expansion

- 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, they are therefore most likely to be deliverable within the first 5 years of the plan period. In general terms, Greenfield sites have less complex deliverability, availability and achievability considerations due to their current use. These sites along with brownfield sites can secure community benefits and infrastructure, including much needed affordable housing, but are considered to be less constrained by issues of viability, such as sites under Option 1.

Option 3 - Rural Development

- 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 that suitably allocated smaller sites can meet local housing needs, this spatial strategy cannot be relied upon to deliver the housing numbers purported in Table 1 of the consultation document. Thus, the dwellings proposed here need to be re-distributed through Options 1 and 2 preferably brownfield / previously developed sites to make the most effective use of land as set out by paragraph 119 of the framework to meet housing needs.

Option 4 - Green Belt Release

- 6.1.7 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 neighboring Council is proposing urban extension or standalone new settlements to meet their housing need.
- 6.1.8 Medway's Green Belt represents 5% of the administrative area and the need for Green Belt release only forms part of the potential supply and should not be relied upon to fully meet the housing need. Therefore, Option 4 should be part of a rounded approach from Medway to deliver decent housing in sustainable locations to meet the needs of its population.

6.2 SUMMARY

- 6.2.1 To meet the identified housing requirement in full, housing will need to be allocated drawing on a number of the four options for development rather than an individual strategy. It is considered that Option 3 Rural Development need to be relied upon less due to deliverability concerns of the development of the 5,000 dwelling that were part of the Hoo development framework due to the loss of HIF funding. Aligned with this are sustainability concerns around some of the smaller rural settlements on the Hoo peninsula. The Green Belt is limited in Medway so can only take a small portion of development if the sites area is released as indicated in Map 4 of the Consultation document. Therefore, urban regeneration sites and suburban growth need to take more of the burden for meeting the Council's housing and employment needs.

7 OTHER COMMENTS ON THE LAND AVAILABILITY ASSESSMENT

- 7.1.1 The accompanying Vision Document by Assael (**Appendix 1**) illustrates how the Medway City Estate could itself now evolve in the coming years in corporation Site Refs **SR27,28,29,30,31,33,35,36,38,39** and **40** to become an area which creates a new sustainable community which contributes to employment floorspace and job creation whilst providing a significant amount of housing within the centre of the Medway Towns creating new links and connections to the areas around the peninsula.

8 CONCLUSIONS

8.1 OVERALL SUMMARY

Overall Summary

- 8.1.1 The overall Vision for Medway partly accords with Paragraph 15 of the NPPF setting out the economic, social and environmental priorities for the Local Plan to facilitate Medway becoming a leading regional city. However, the vision is silent on the requirement of Paragraph 15 to require up-to-date plan to provide a framework for addressing housing need. Delivering homes and new neighbourhoods and communities underpins economic investment, and social and environmental priorities as it is a catalyst for place-making which is at the heart of Medway's vision to become a leading regional city.
- 8.1.2 To support a vision that includes a framework to deliver housing to meet local needs it is essential to have a strategic objective to support the delivery of homes, as the need for housing is the underlying catalyst for creating the sustainable, resilient and economically driven aspiration for Medway to become a leading regional city. Therefore, a fifth objective is required within the emerging Local Plan at the Regulation 19 stage of development to address housing needs in Medway to deliver the vision of the Local Plan.
- 8.1.3 The LAA assessment considers 447 sites across the four residential development options to deliver the 28,500 required homes across the plan period. There are concerns over the deliverability of sites across all the options proposed in the consultation document due to deliverability concerns over the loss of HIF funding and the sustainability of sites in rural development areas, the location of sites within sites of landscape sensitivity/importance and country parks along with potential viability concerns over the deliverability sites due to the cost of remediation measures and the impact of mandatory BNG from January 2024 for major development sites and several sites deliverability being challenged due to the age/ number of lapsed consents on the site.
- 8.1.4 Having analysed the 447 sites it is a conservative estimate that 10,182 homes can be removed from the potential Housing Supply for the plan period before the Council have discounted any sites at Stage 2 and 3 of the LAA due to concerns over deliverability and availability of the sites.
- 8.1.5 The 3 Veetee sites (**Refs. SR 30,31 and 37**) identified within the LAA are capable of delivering circa 1,000 residential units to help meet the housing needs of Medway Council in a sustainable and suitable location where they can be a catalyst for the further regeneration of the wider Medway City Estate into the creation of

a new sustainable mixed-used community in the heart of the Medway Towns, capable of helping to meet the shortfalls in housing delivery identified in this representation. The Medway City Estate has the ability to deliver housing and mixed used development on individual sites in the mid to later stages of the plan period, with the ability to continue to deliver mixed use development into a further plan period through the Wider vision for the Medway City Estate which would include resolving land ownership issues through the creation of a new peninsula master plan and development framework.

Conclusion

- 8.1.6 The 3 Veetee's sites are deliverable in the mid to later years of the plan period once Veetee has found a site to relocate their operations to. The delivery of the circa 1,000 units across the 3 sites has the potential to be a catalyst for the urban regeneration of the whole peninsula helping Medway achieve its housing need through a greater proportion of development in Options 1 and 2 with additional support from Options 3 and 4 of the spatial strategy. Therefore, a mixed approach to the spatial strategy should be taken to achieve the Council's vision for the Local Plan which must include housing and employment which underpin the vision and spatial objectives of the emerging Local Plan.

planning
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infrastructure
land

MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE

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1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

- 1.1.1 These representations have been prepared on behalf of the Mockbeggar Property Account 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 (North Site) would positively contribute to meeting the strategic objectives of the Local Plan and spatial strategy for growth, which for the reasons we outline must draw on all the spatial options to deliver the identified housing requirement. Whilst the consultation document does not expressly invite comment on individual sites, it is highly pertinent to the consideration of the different spatial strategies to consider the suitability and deliverability of individual sites to ensure the Local Plan is deliverable and thus "Sound" (NPPF, para 35).
- 1.1.4 These representations must be read alongside the on-line form/platform which has been completed.

1.2 SUMMARY

- 1.2.1 As set out in full in the representation, the Local Plan must:
- Plan to meet its full objectively assessed need. The Council has persistently under delivered against its housing requirement 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 North Site 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 7th 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 |
| 1986/87- 2021/22 | 27,407 | 35,727 | -8,320 |

TABLE 3.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

- 4.1.4 It is noted that Gravesham Borough Council through its previous Regulation 18 consultation asked Medway to take 2,000 homes to assist it in meeting its housing need. Therefore, it is even more pressing that 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 not 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

- 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

- 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

- 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 |
| Total potential supply | 38,216 | 27,674 | 10,182 |

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 (NORTH SITE)

5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

- 5.1.1 The site highlighted below has not been previously promoted through Medway's previous Call For Sites exercises, however, it is considered that the site is suitable and available for development. The site borders parts of Lee Green Road and Town Road, stretching north towards Cliffe Woods and borders the Great Chattenden Woods to the northeast. The site comprises of roughly 30 hectares of agricultural land, as can be seen in the site plan below:



FIGURE 5.1: SITE PLAN FOR THE MOCKBEGGAR NORTH SITE

- | | |
|-------|---|
| 5.1.2 | The site provides an opportunity for a residential or mixed-use development. |
| 5.1.3 | The site could benefit from multiple vehicular access via Lee Green Road or Town Road. It is also adjacent to Cliffe Woods and in close proximity to Wainscott (1.5km at its closest) and benefits from easy access to the wider road network via Town Road. |
| 5.1.4 | It is understood that there is land to the north and south of the site that has been put forward in the 'call for sites' exercise. SR14 to the north could form a sustainable expansion of Cliffe Woods in conjunction with the Mockbeggar north site highlighted here. Furthermore, site SR9 to the south would also be a logical extension to Cliffe Woods, when combined with this parcel of land. 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 or extension to it, when combined with SR14. |

- 5.1.5 The nearest railway station is Strood roughly 3.2km 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 and attractive opportunity for a mixed-use development of homes and other provisions to support the residential development.

5.2 WHY DEVELOP ON AGRICULTURAL LAND?

- 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 the site 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 The site 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 small extensions to Cliffe Woods when considered alongside the proposed allocation of site SR14, 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 ownership of the Mockbeggan Property Account and having minimal constraints, it provides a sustainable location for housing development that can be delivered early on the 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

Trees

- 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

- 5.3.2 There is a public right of way to the East of the site, which would need to be considered as part of any development layout. It has a bridleway (ID: RS76) running from North to South on the site. This PROW will provide residents with access to Cliffe Woods and the Great Chattenden Wood SSSI, promoting the use of more sustainable forms of transport.

Flood Risk

- 5.3.3 The site lies entirely within Flood Zone 1 and therefore is not at risk of any flooding.

Contamination

- 5.3.4 The site is not considered to have a likely presence for contamination and would therefore not constrain development.

Archaeology and Heritage

- 5.3.5 The site is not near any listed buildings. The site is not known to have a presence of archaeology; however, mitigation measures can be addressed if required.

Noise and Air Quality

- 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.

Great Chattenden Wood SSSI

- 5.3.7 It is noted that Great Chattenden Wood, to the north east of the site is designated as a SSSI. As such, any development of the site will need to take into account this designation and design in appropriate buffer zones as required.

5.4 SUMMARY

- 5.4.1 Whilst it is acknowledged that the site wasn't promoted through the Council's initial Call for Sites consultation, it is, nonetheless, considered that the site provides a logical location for development, either in isolation or as part of a wider extension to the existing settlement of Cliffe Woods.
- 5.4.2 We would, therefore, be grateful if the Council could take this site into consideration as part of their ongoing work/strategy formulation in respect of the emerging Local Plan.

6 PREFERRED SPATIAL STRATEGY

6.1 PREFERRED SPATIAL STRATEGY

- 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

- 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

- 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

- 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 (North Site) is south of Cliffe Woods and has a current agricultural land use 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 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

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

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 extensions of rural settlements, like Cliffe Woods.

7 CONCLUSIONS

7.1 OVERALL SUMMARY

- 7.1.1 This representation has been prepared on behalf of the Mockbeggar Property Account 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. Furthermore, this submission has been made to highlight the availability of the land for development, as it was not included in the 'call for site' consultation.
- 7.1.3 In any event, 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 as a residential and/or 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 the Mockbeggar North Site to deliver a significant number of new homes (subject to further detailed review), as well as delivering further provisions to support the residential area.
- 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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land

MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE

Temple Sawmill, Strood

**LAA REF: CHR20
OPUS SUBMISSION FORM REF: 262
RESPONDENT ID REF: 423
REGULATION 18 SUBMISSION ID: ID: 1677**

CLIENT: MORGAN TIMBER

October 2023
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1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

- 1.1.1 These representations have been prepared on behalf of Morgan Timber in response to Medway Council's '*Setting the direction for Medway 2040*' Regulation 18 Local Plan consultation 2023 for Sites Reference CHR20 known as 'Temple Sawmill'. The consultation is a statement of the Council's commitment in getting a new Local Plan in place for the period 2022-2040 (18 yrs.) and seeks to provide certainty in the direction for Medway's growth.
- 1.1.2 The consultation document is very high level and does not include any preferred strategy for growth but provides options for growth set within the background of the identified housing requirement, the "Vision" and "Strategic Objectives" set by the Council. These representations are made within this context and answer the following key questions:
- 1) Do you have any comments about the proposed vision?
 - 2) Do you have any comments about the proposed strategic objectives?
 - 3) Do you have any comments about the considerations in developing the spatial strategy?
 - 4) Do you have any comments about the interim Land Availability Assessment?
- 1.1.3 In answering the above questions, it has been further demonstrated how the Temple Sawmill site (Refs CHR20) at Temple Waterfront would continue to provide an appropriate location as an Allocated Site, in the emerging Local Plan. The site is suitable to provide residential development through urban regeneration positively contribute to meeting the strategic objectives of the Local Plan its spatial strategy for growth, which for the reasons we outline must draw on all the spatial options to deliver the identified housing requirement. Whilst the consultation document does not expressly invite comment on individual sites, it is highly pertinent to the consideration of the different spatial strategies to consider the suitability and deliverability of individual sites to ensure the Local Plan is deliverable and thus "Sound" (NPPF, para 35).
- 1.1.4 These representations must be read alongside the on-line form/platform which has been completed.

1.2 SUMMARY

1.2.1 As set out in full in these representations, 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 yrs., 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 sites promoted (Temple Sawmill Ref. CHR20) setting out the reasons why the sites should continue to be allocated for residential lead development;
- **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” fail 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 7th 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 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 provision and the supporting text amended to include reference to the delivery of 28,312 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 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 (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.

- 3.1.7 More generally, the objectives also talk about development on brownfield land as part of the ongoing benefits of Medway's regeneration set out at objective 4 (Boost Pride in Medway through quality and resilient development). 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 include 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.
- 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, 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). 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 development through the other development options if the Council are to realise the delivery of their housing need.

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 per annum (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 below, 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 p.a. (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 |
| 1986/87- 2021/22 | 27,407 | 35,727 | -8,320 |

TABLE 3.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

- 4.1.4 The Consultation document (para 5.11) notes the Medway must consider if it can take 2,000 homes to assist Gravesham Borough Council 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 Paragraph 5.3 of 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 p.a. 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 refer 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 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 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.

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

- 4.2.13 Map 1, as set out in 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 The site is currently occupied by our client Morgan & Company, an independent timber importers and timber merchants. Whilst the site has been an allocation in the current adopted Local Plan since 2003 as part of the wider TWDB Morgan & Company Timber a winding down operations at the site, meaning the site has become available.
- 4.2.15 The Site is a deliverable as a potential allocation given that the site forms part of the currently adopted TWDB (2006) with Phases 1a and 1b of the Temple Waterfront Development area already being delivered to the south of the site by a major housing builder.
- 4.2.16 Historically within the TWDB Site CHR20 has been proposed for mixed use development including employment space. There is currently sufficient provision of retail (both convenience and comparison) and leisure in close proximity to the Subject Site. Furthermore, the Subject Site is not considered attractive to retail occupiers due to its limited visibility and footfall. Current retail availability represents over 41 years of supply based on historic demand trends.
- 4.2.17 With regards to office provision homeworking has been embraced in the South East at a higher rate than the England average, and this is particularly the case in traditionally office base roles. This has contributed to Medway having a healthy level of office availability as well as negative net absorption (demand) since 2019, indicating a weak office market. Furthermore, the Subject Site is not considered to be a suitable site for office development as it is not a town centre location and does not benefit from direct rail connections unlike other town centre sites.
- 4.2.18 The Industrial and Logistics (I&L) market has been performing better than both the retail and office markets, both nationally and in Medway. Despite this, the site is

not considered suitable for I&L due to the poor road infrastructure connecting the Site to the nearest motorway junction plus potential environmental nuisance to surrounding residential development. Alongside this, Medway has a healthy pipeline of I&L developments (up to 4.2 million sqft) to help meet current and future I&L demand in locations better connected to key motorways and A-roads.

- 4.2.19 Therefore, it is considered that this remaining phase of the TWDB (2006) should come forwards for residential development only. Given the site is an existing allocation that is now available we consider that the council should continue the sites allocation in a Regulation 19 version of the emerging Local Plan. This will allow Medway's aspirations for the delivery of the Temple Waterfront Area to be complete.

4.3 SUMMARY

- 4.3.1 Overall, Table 1 of the consultation documents allocates 11,151 dwellings to be built in the urban regeneration option for the spatial strategy of the emerging Local Plan. Site CHR20 has been a long-standing allocation in the adopted local plan and is no available for redevelopment for residential development only given the existing market availability of retail, office and I&L sites and better availability of sites is Medway for these uses. Given the site is already principally considered appropriate for development through its current allocation the continuation of the site as an allocation is logical given the sustainability of the site has already been demonstrated in the TWDB (2006).

5 SITE – TEMPLE SAWMILL REF CHR20

5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

The Opportunity

- 5.1.1 Site CHR20 known as Temple Sawmill is a 3.6ha site within the urban area of Strood allocated as part of the Temple Waterfront Development Brief (2006) (TWDB). The TWDB sits within the Strood Waterfront Regeneration Area allocated under Policy S10 of the adopted Medway Local Plan (2003) (See Figure 5.1.1 below).

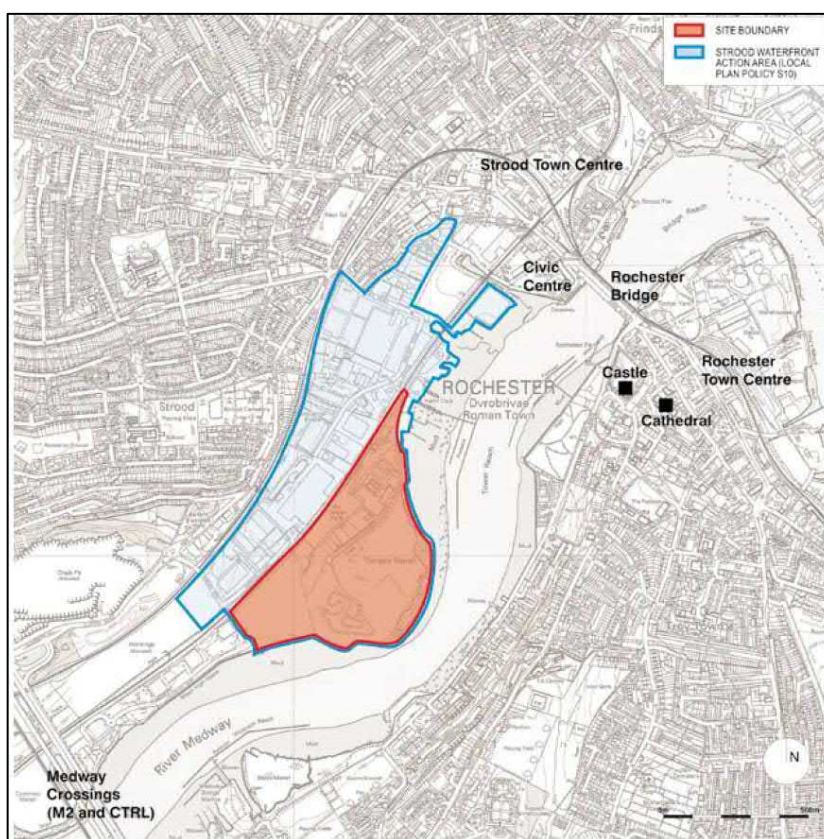


FIGURE 5.1.1 THE TEMPLE WATERFRONT DEVELOPMENT AREA (RED) WITHIN THE STROOD WATERFRONT ACTION AREA (COURTESY OF MEDWAY COUNCIL 2006)

- 5.1.2 Site CHR20 is one of two remaining phases of planning consent MC/09/0417 at Temple Waterfront that has had no reserve matters applications on it. Therefore, the permission has lapsed for site CHR20 and the other parcel of land. The other parcel of land is Phase 2 which is understood to be owned by the Council and is not shown in the Stage 1 LAA as an urban regeneration site for redevelopment.
- 5.1.3 Unlike other parts of the wider site, the Temple Sawmill as set out in section 4 above the site has only recently become available for development due to the winding down of the sawmill operation in 2023.
- 5.1.4 Morgan Timber have had pre-application discussions with the Council over the development for this site for residential development only due to the need and market conditions for employment uses not being viable in this location. The discussions centred around the delivery of up to 170 units comprising of mainly houses and some apartments.
- 5.1.5 The opportunity to continue the allocation of site CHR20 aligns with paragraph 5.19 of the consultation document which states that "the new local plan will draw on existing policy strategies and programmes that promote the regeneration of Medway's urban centres and waterfront." The continued allocation would help secure the underutilised brownfield site for redevelopment through the local plan.
- 5.1.6 Site CHR20 is considered an important regeneration opportunity in line with the wider regeneration of Strood and the Strood Waterfront Action Area and Medway Waterfront Renaissance Strategy in the Local Plan (2003) of which many of the sites have been promoted in the Call for Sites earlier in 2023 and shown in the Stage 1 LAA.
- 5.1.7 The Allocation of site CHR20 and the eventual building out of the site will help integrate Strood Waterfront Regeneration Area within the wider Strood and Medway urban area thus achieving goal of the urban regeneration strategy proposed by the Council set out at paragraph 5.19 of the consultation document for is waterfront sites.
- 5.1.8 The site lies circa 1km from Strood Railway Station and the Town Centre north of the site. The railway station is c.20-minute walk from the site which is accessible via continuous footways. There is an esplanade which runs on the northern side of the Medway near to the bridge that allows access towards the Site. It caters for both pedestrian and cyclists and runs adjacent to the river Medway.
- 5.1.9 There are services and amenities available within a short walk from the Site; these include the Morrison superstore and the Strood Retail Park where eateries and other chain supermarkets can be found.

- 5.1.10 The nearest bus stops are located on Priory Road and are served by eight routes. The Priory Road bus stop is a seven-minute walk from the site. These routes operate to earliest, Bluewater, Kings Hill, Medway Valley Park and West Malling including intervening stops.
- 5.1.11 Additional bus stops are circa 12-minute walk from the site where services run to Strood and Chatham.
- 5.1.12 The allocation of site CHR20 would provide the opportunity for the following (as shown in figure 5.1.2 Below):
- To complete the Vision set out within the TWDB (2006);
 - Up to 170 dwellings including affordable housing through a variety of detached, semi-detached and terraced and apartments distributed throughout the site in a sustainable location;
 - A spine Road that connects this phase of development of the TWDB to Phase 1b;
 - A connective network of existing and new footpaths and cycleways through the site and to surrounding areas, building on the informal paths through Temple Marsh in the south;
 - Creation of shared surface tertiary routes as green lanes through tree lined streets that provide a distinctive informal character as a setting for new homes, reflecting and enhancing the semirural characteristics of the southern edge; and
 - Incorporation of a LEAP; and
 - Additional green and blue Infrastructure.



FIGURE 5.1.2 ILLUSTRATIVE MASTERPLAN FOR SITE CHR20

5.2 OTHER CONSIDERATIONS

Public Rights of Way

- 5.2.1 There are no known Public Rights of Way that affect the site.

Flood Risk

- 5.2.2 The site lies within the tidal reaches of the river Medway the site lies within Flood zone 2 and 3 and is therefore medium/high probability of flooding. However, work is being undertaken to demonstrate that the land can be developed in such a way as to ensure there is no risk of flooding to future residents, and that the risk of flooding from other sources is low.

- 5.2.3 Modelling work undertaken demonstrates the proposed development can be accommodated on Site whilst being at the lowest risk of flood from all sources, including the 1 in 100-year rainfall event plus climate change. This can also be specified in any Strategic Planning Policy that looks to allocate the sites for residential-led mix use development in the emerging Local Plan.

Contamination

- 5.2.4 The site is a former timber sawmill, and so is clearly a brownfield site. It is anticipated that there will be elements of contamination on site due to the historic use. Through potential mitigation measures such as piled foundations, geotextile marker layer below any imported materials along with other measures will likely make the ground appropriate for residential development. Contamination assessments and their recommended mitigation measure can be requested by the Council and put in place if the site were to come forward for development.

Heritage Assets

- 5.2.5 The site lies immediately south of Temple Manor which is a Grade I listed building and scheduled monument. Temple Manor is managed by Medway Council on behalf of English Heritage and is open as a visitor attraction. The scheduled area of Temple Manor includes the buried and upstanding remains of the medieval manor house and 'camera' of the Knights Templars. The upstanding remains include a thirteenth century stone hall which is a Grade I Listed Building.
- 5.2.6 The existing setting of Temple Manor is compromised by the industrial nature of its surroundings and furthermore, it is separated from the application site by the Medway Valley railway line which sits on a raised embankment.
- 5.2.7 The development adjacent to the railway line is c.70m from the heritage asset. The illustrative masterplan (Figure 5.1.2) shows the buildings closest to the asset to be 2.5 storey buildings and therefore not visible above the railway line which creates a physical visual barrier to the site from the asset.

Archaeology

- 5.2.8 it is understood that due to the development of the site due to its location/proximity to the river Medway and its mud flats is geoarchaeological sensitive with potential for Holocene alluvium (largely overbank floodplain deposit) and the Beach and Tidal Flat Deposits of Holocene age that could contain a stratified landscape and land-use record over the past 10,000 years. They also have the

potential to bury, seal and contain evidence of former human occupation and activity.

- 5.2.9 The second deposits of geoarchaeological potential are Pleistocene fluvial deposits underlying the superficial deposits (alluvium and beach and tidal flat deposits). These are principally gravels but which include sands and finer grained material.
- 5.2.10 Archaeological Desk-based Assessments would therefore be required for any planning application if the site was to be allocated. Whilst the site is in a potential area of significance it is considered that any potential impacts can/could be mitigated against through a programme of archaeological works, watching briefs etc if an application were to come forward. Therefore, this is not considered a constraint to development.

Biodiversity Net Gain

- 5.2.11 The site currently comprises a brownfield site. However, the site does have areas of neutral grassland, mixed scrubland, modified grassland and vegetated garden. The illustrative masterplan can demonstrate a circa 9% net gain on site with a further 1% being provided off site on land owned by the same landowner to provide a 10% net gain. Therefore, this is not a constraint to the development of the site like many other urban regeneration sites.

Employment Land Allocation

- 5.2.12 As set out in paragraphs 4.2.16 to 4.2.19 the site has historically been allocated for residential mixed-use development as part of the site's wider allocation within the Temple Waterfront Development Area. Paragraphs 4.2.16 to 4.2.19 identify that there is existing land elsewhere in Medway meeting the needs of retail, office and I&L needs. The above paragraphs also set out that due to the access of the site and out-of-town centre location it is not appropriate for I&L or Office uses. Therefore, the site is put forward for a continued allocation in the emerging Local Plan for residential uses only for up to 170 units.

Deliverability and Suitability

- 5.2.13 For sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.
- 5.2.14 Availability is essentially about confirming that it is financially viable to develop, and viability remains a central consideration throughout plan making. The site is currently allocated for residential-led mixed-use development. However, given the

lack of need for employment uses currently with the urban area of Medway and the sites proximity to an existing industrial estate is it considered that the site should only be brought forwards for residential use only.

- 5.2.15 The Masterplan at Appendix 1 shows that the site can be delivered for residential development. The current allocation and the development of the illustrative plans show that the site is available and suitable for development, joining up with the wider Temple Waterfront sites to complete the registration of this section of Strood's.
- 5.2.16 Given the nature of the site and its availability it is considered that the circa 170 dwellings and commercial space would start to be delivered towards the end of the first 5 years of the Plan period.

Achievability

- 5.2.17 The achievability of the sites is reliant upon agreeing appropriate contamination mitigation measures and agreeing with archaeological consultees an approach to develop the site if findings of archaeological remains of significance are found.
- 5.2.18 With the concerns outlined in previous Sections of the representation relating to the peripheral sites in the rural development spatial development option to the northern edge of Cliff Woods the delivery of residential sites on the Hoo Peninsula and other rural settlements such as Lower Stoke, Allhallows and the Isle of Grain given Medway's loss of HIF funding to deliver the infrastructure requirements to develop the majority of the sites puts into question the sustainability and deliverability of the sites in and around Hoo.
- 5.2.19 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).
- 5.2.20 Therefore, it is evident that additional the achievability of housing needs will be increasingly likely to be reliant on additional uplift in housing in the more sustainable locations in the urban areas of the Medway Towns like the Waterfront regeneration sites such as site CHR20. The redevelopment of the Temple Sawmill sites would provide opportunity to maintain an existing allocation for residential lead development that is achievable over the next plan period that will help go some way to meet Medway's housing needs in a sustainable location.

5.3 SUMMARY

- 5.3.1 The site CHR20 has capacity to deliver circa 170 residential units providing opportunities for residential development on the Strood Waterfront within a location that is considered to be sustainable in good proximity to local services and transport networks. The redevelopment of the site would make the most effective use of land in accordance with paragraph 119 of the NPPF and boost the supply of homes in accordance with paragraph 60 of the NPPF.

6 PREFERRED SPATIAL STRATEGY

6.1 PREFERRED SPATIAL STRATEGY

- 6.1.1 As is evident from Table 1 of the consultation document that no single development scenario supplies enough homes to meet the Councils 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 "a mixed approach of the 4 residential development options" allowing for urban regeneration sites to deliver a high proportion of the dwellings required to create the sustainable and resilient communities as per the Plans vision. In identifying our preferred option, we have also considered the pros and cons of the other development options.

Option 1 - Urban Regeneration

- 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 set out within Section 4, there are concerns raised regarding the deliverability of some of these sites. The availability and deliverability scenarios around brownfield are generally complex. Given delivery rates it is understood that such sites would make up a significant component of the housing land supply, after the first 5 years of the Local Plan being adopted because of the complexities involved with such sites coming forward.

6.2 SUMMARY

- 6.2.1 To meet Medway's identified housing requirement in full, housing will need to be allocated drawing on several of the four options for development rather than an individual strategy. It is considered that Option 3 Rural Development need to be relied upon less due to deliverability concerns of the development of the 5,000 dwellings that were part of the Hoo development framework due to the loss of HIF funding. Aligned with this are sustainability concerns around some of the smaller rural settlements on the Hoo peninsula. The Green Belt is limited in Medway so can only take a small portion of the development. Therefore, urban regeneration sites and suburban growth need to take more of the burden for meeting the Council's housing and employment needs.

7 OTHER COMMENTS ON THE LAND AVAILABILITY ASSESSMENT

- 7.1.1 The online map for Appendix D of the consultation document identifies sites that are part of the council pipeline of development. Whilst the PDF copy of the LAA Appendix D identifies all of the TWDB area as pipeline development.
- 7.1.2 To confirm site CHR20 is one of the last remaining sites identified as land within the TWDB (2006) that is yet to be built out. The wider TWDB area is shown in red below.

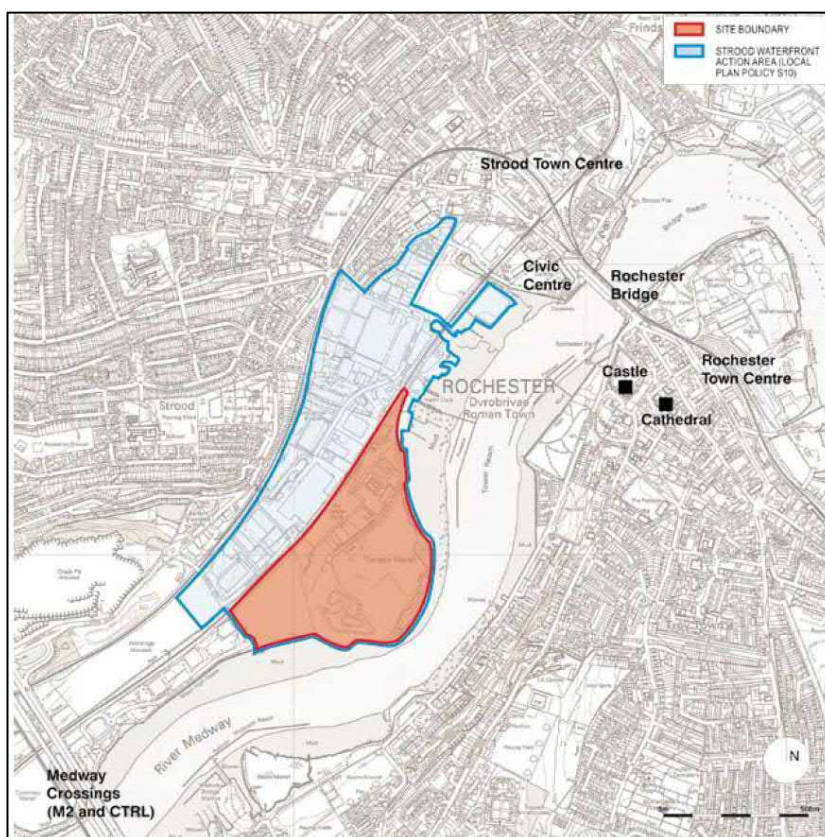


FIGURE 7.1 THE TEMPLE WATERFRONT DEVELOPMENT AREA (RED) WITHIN THE STROOD WATERFRONT ACTION AREA (COURTESY OF MEDWAY COUNCIL 2006)

- 7.1.3 The Temple Waterfront development area was first granted outline planning consent in 2011 (LPA Ref: MC/09/0417) for mixed use (for the whole site of which this phase is a part) for:

- up to 620 units (Use Class C3);
 - up to 10,300 sqm of employment floorspace (Use Classes B1a/b/c, B2 and B8);
 - up to 1,800 sqm of retail floorspace (Use Classes A1 to A5);
 - up to 200 sqm community facilities (Use Classes D1/D2);
 - strategic landscaping, improvements to open space, parking and related infrastructure including works in relation to site preparation, flood defence and land raising.
- 7.1.4 Applications MC/16/0600, MC/17/47034, and MC19/0518 have resulted in a variation of units within the different phases.
- 7.1.5 Phase 1A of the wider development has been implemented and is currently under construction. This phase has had an increase from 210 to 232 units.
- 7.1.6 Phase 1B (also referred to as Phase 2 in some documents) has decreased from 210 originally to 132 units.
- 7.1.7 As a result, of the 620 residential units originally permitted at Temple Waterfront, only 364 (59%) have either been built or are expected to be built out under an extant permission.
- 7.1.8 Site CHR20 and Phase 2 (also referred to as Phase 3 in some documents) had planning permission for residential and mixed-use development but no reserved matters consent was applied for prior to the permission lapsing.
- 7.1.9 Therefore, it is not clear how the Council have identified site CHR20 as being within the housing pipeline when there is not extant consent on this site.
- 7.1.10 Moreover, the earlier phase, Phase 1A, has been delivered by a major house builder with Phase 1B being partially delivered. From the Stage 1 assessment of the LAA it is not clear how many of the 2,061 homes identified as 'being under construction as of 31 March 2023' as identified in Appendix D are from the Temple Waterfront Development Area.
- 7.1.11 It is our understanding that Phase 1A was completed before 31 March 2023 and part of Phase 1B has also been completed prior to the 31 March 2023. Therefore, we question the reliability of the 2,061 homes in the pipeline set out at Appendix D which are said to be under construction.

8 CONCLUSIONS

- 8.1.1 The overall Vision for Medway partly accords with Paragraph 15 of the NPPF setting out the economic, social and environmental priorities for the Local Plan to facilitate Medway becoming a leading regional city. However, the vision is silent on the requirement of Paragraph 15 of the NPPF to require up-to-date plans to provide a framework for addressing housing need. Delivering homes, new neighbourhoods and communities underpins economic investment, social and environmental priorities as it is a catalyst for place making which is at the heart of Medway's vision to become a leading regional city.
- 8.1.2 To support a vision that includes a framework to deliver housing to meet local needs it is essential to have a strategic objective to support the delivery of homes, the need for housing as it is the underlying catalyst from creating the sustainable, resilient and economically driven aspiration for Medway to become a leading regional city. Therefore, a fifth objective is required within the emerging Local Plan at regulation 19 stage of development to address housing need in Medway to deliver the vision of the Local Plan.
- 8.1.3 The Temple Sawmill site (Ref CHR20) is a brownfield site identified within the Stage 1 LAA and has been shown through this representation to be available, deliverable, suitable and within a sustainable location for residential development for circa 170 residential units to help meet Medway Council's needs. The site has the potential to start delivering homes within the first 5 years of the Plan period (2022-2027). Given that the site is brownfield, available, suitable, and deliverable within the first 5 years of the plan the site should be a priority for allocation in the emerging Local Plan as an Urban Regeneration Allocation site.

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transport
design
environment
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MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE

Grays of Chatham Site

**LAA REF: FP11
OPUS SUBMISSION FORM REF: 281
RESPONDENT ID REF: 427
REGULATION 18 SUBMISSION ID:1685**

CLIENT: OPTION TWO DEVELOPMENT LIMITED

OCTOBER 2023
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1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

- 1.1.1 These representations have been prepared on behalf of Option Two Development Limited in response to Medway Council's '*Setting the direction for Medway 2040*' Regulation 18 Local Plan consultation 2023 for Sites Reference FP11 known as 'Grays of Chatham'. The consultation is a statement of the Council's commitment in getting a new Local Plan in place for the period 2022-2040 (18 yrs.) and seeks to provide certainty in the direction for Medway's growth.
- 1.1.2 The consultation document is very high level and does not include any preferred strategy for growth but provides options for growth set within the background of the identified housing requirement, the "Vision" and "Strategic Objectives" set by the Council. These representations are made within this context and answer the following key questions:
- 1) Do you have any comments about the proposed vision?
 - 2) Do you have any comments about the proposed strategic objectives?
 - 3) Do you have any comments about the considerations in developing the spatial strategy?
 - 4) Do you have any comments about the interim Land Availability Assessment?
- 1.1.3 In answering the above questions, it has been further demonstrated how the Grays of Chatham site (Refs FP11) on Chatham High Street would continue to provide an appropriate location as an Allocated Site, in the emerging Local Plan. The site is suitable to provide residential development through urban regeneration positively contribute to meeting the strategic objectives of the Local Plan its spatial strategy for growth, which for the reasons we outline must draw on all the spatial options to deliver the identified housing requirement. Whilst the consultation document does not expressly invite comment on individual sites, it is highly pertinent to the consideration of the different spatial strategies to consider the suitability and deliverability of individual sites to ensure the Local Plan is deliverable and thus "Sound" (NPPF, para 35).
- 1.1.4 These representations must be read alongside the on-line form/platform which has been completed.

1.2 SUMMARY

1.2.1 As set out in full in these representations, 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 yrs., 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 sites promoted (Grays of Chatham Ref. FP11) setting out the reasons why the sites should continue to be allocated for residential lead development;
- **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” fail 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 7th 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 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 provision 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 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 (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.

- 3.1.7 More generally, the objectives also talk about development on brownfield land as part of the ongoing benefits of Medway's regeneration set out at objective 4 (Boost Pride in Medway through quality and resilient development). 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 include 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.
- 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, 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). 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 development through the other development options if the Council are to realise the delivery of their housing need.

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 per annum (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 below, 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 p.a. (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 |
| 1986/87- 2021/22 | 27,407 | 35,727 | -8,320 |

TABLE 3.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

- 4.1.4 The Consultation document (para 5.11) notes the Medway must consider if it can take 2,000 homes to assist Gravesham Borough Council 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 Paragraph 5.3 of 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, Cliffe 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 p.a. 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 refer 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 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 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.

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 However, the urban regeneration sites are only relevant to this representation remainder of this section analyses the capacity of each category for potential housing delivery identified in the LLA.

Urban Regeneration Sites

- 4.2.13 Map 1, as set out in 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 The site is currently comprising the Grays of Chatham car dealership site at 1-33 (excluding 21) High Street, Chatham. The site occupies a significant area of the High Street frontage and is open to the bend in the river to the north. The quality of the existing buildings on the site is relatively poor. The large area of hardstanding has created a significant gap in the townscape and provides an uncharacteristic openness to the High Street.
- 4.2.15 The Site is a current adopted allocation in the Local Plan (2003) (Policy H1) for 28 units.
- 4.2.16 The site was assessed in the 2015 Strategic Land Availability Assessment (SLAA) where it was found to be suitable for a mixed-use development suitable for the development of around 25 residential units plus 5,915 sqm of office floorspace, 2,365 sqm of industrial floorspace and 2,365 sqm of storage floorspace. Whilst the site is identified as having several constraints, the assessment concluded that these could be resolved subject to further assessment. The 2019 Update to the SLAA identified the site for solely as a residential development with capacity for around 97 units.
- 4.2.17 The site is also listed on the Council's Brownfield Register where it is shown to be suitable for the development of 97 dwellings.

4.3 SUMMARY

- 4.3.1 Overall, Table 1 of the consultation documents allocates 11,151 dwellings to be built in the urban regeneration option for the spatial strategy of the emerging Local

Plan. Site FP11 has been identified as a brownfield site within the urban area capable of regeneration since 2015 and is currently on the council's brownfield register. Given the site's current allocation and it being on the Council brownfield register the site is principally considered appropriate for development. It therefore would make a logical allocation in the emerging Local Plan.

5 SITE – GRAYS OF CHATHAM REF FP11

5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

The Opportunity

- 5.1.1 Site FP11 known as Gray of Chatham (is a car dealership at 1-33 (excluding 21) High Street, Chatham. As set out in the section above, the site has historically been considered appropriate for residential-led redevelopment given its current allocation in the adopted Local Plan and it being continually identified in various SHLAAs and brownfield registers as a site that is suitable and available for development.
- 5.1.2 Several bus routes pass the site on a frequent basis, whilst the site is also within 400m of Chatham bus station and is seven minutes' walk from Chatham railway station. High Street, Chatham also forms part of a National Cycle Route 1, which runs from Dover to Tain, in the Scottish Highlands. More locally, Route 1 connects High Street Chatham with other Kent towns including Rochester and Sittingbourne.
- 5.1.3 Therefore, the site is in a sustainable location for development with access to numerous amenities, services and sustainable transport modes.
- 5.1.4 The Site is the subject of a current planning application (undetermined LPA ref MC/21/0249) for demolition of existing buildings and redevelopment of site for a residential-led mixed-use development including residential dwellings, a residents' lounge/function room and gymnasium in buildings of up to 6 storeys, together with associated access, car and cycle parking, bin stores, landscaping and amenity space, and a river walk.
- 5.1.5 Whilst this application is in abeyance pending further design changes, the applicant continues to promote the site for development. It is considered that any allocation could support circa. 100 units at the site providing a betterment to the street scene and character of the area than what currently exists at the site.
- 5.1.6 It has been understood through the current application process that the Council supports the principle of redevelopment subject to securing the most appropriate design. Therefore, this representation provides an opportunity to allocate the site for circa 100 units in line with the Council brownfield register and SHLAA assessments.

5.2 OTHER CONSIDERATIONS

Public Rights of Way

- 5.2.1 There are no known Public Rights of Way that affect the site. There is however an opportunity for a new walkway to be provided within the site boundary contributing towards a longer waterfront footpath.

Flood Risk

- 5.2.2 Part of the site falls within a flood zone, being adjacent to the River Medway. The Environment Agency has confirmed in discussions to date that the design standard in this case should be the 1 in 200 annual probability plus climate change allowance level. This has led to a design finished floor level for sleeping accommodation of 6.75m AOD.
- 5.2.3 Existing flood defences are identified to be retained. These include a sea wall along the northern side of the site, and high ground either side of the sea wall (and either side of the site). This can also be specified in any Strategic Planning Policy that looks to allocate the sites for residential-led mix use development in the emerging Local Plan.

Contamination

- 5.2.4 The site has historically been used for car-related uses. A detailed contamination assessment has been undertaken which is submitted with this call for sites response.
- 5.2.5 The submitted report notes that the site has previously been developed as a dockland within its northern end. Historical and contemporary industrial and commercial uses have included a wharf with warehouses, the use of cranes, weighbridge, and the use of the site as a car dealer/service centre. There is also a potential for underground fuel storage tanks to be present on site however this has not been confirmed during the investigations undertaken to date.
- 5.2.6 No significant sources of on-going contamination were noted during the site walkover. It was considered that the primary source of contamination was the site's historical industrial/commercial use.
- 5.2.7 The site is not located within an Environment Agency defined groundwater source protection zone.

- 5.2.8 Concentrations of toxic metals were generally below their respective soil guideline values. However elevated lead concentrations were encountered across the site. Whilst, in general, organic hydrocarbon concentrations were not significantly elevated, certain slightly elevated PAH and BTEX compounds were encountered within localised areas. Elevated levels of contaminants have been found at the site which could pose a risk to future occupants if exposed to the material for instance in a garden or area of soft landscaping.
- 5.2.9 In areas which are to be covered by either buildings or hard standing, no clean cover layer is required to sever the contain source to receptor pathway. However, during the enabling works the surface layer will be removed pending either off-site disposal or for reuse below buildings and hardstanding across other areas of the site.
- 5.2.10 Site profiling works are likely be necessary as part of the development. It is anticipated that the site will be plateaued to suit the various floor/pavement levels ready to receive the pile mat/pavement base with all soils removed from site down to these levels thereby removing a proportion of the near surface contaminated soils from site. This will remove the potential risk to human health from the lead and organic contamination encountered, by capping the site.
- 5.2.11 Following the successful completion of these remedial works, the risks to the underlying aquifer would be considered to be low.
- 5.2.12 There is a possibility of the presence of Asbestos Containing Material (ACM) within the fabric of the existing site buildings. Prior to demolition, a formal asbestos survey of existing buildings on site would need to be undertaken by a competent contractor.
- 5.2.13 The report recommends that a watching brief be implemented on this site during enabling works and should any further contamination or potentially contaminative sources be discovered during the proposed enabling works all site works would cease and suitably competent consultants/engineers will attend site to agree a formal remediation strategy.
- 5.2.14 The report concludes that based on the principles and definitions outlined under section 57 of the Environment Act 1995, the site would not be considered to be "Contaminated Land" based on its proposed redevelopment with a change of end use to residential without plant uptake, provided that the recommended remedial works are implemented.

Heritage Assets

- 5.2.15 The site is located within the Star Hill to Sun Pier Conservation Area.
- 5.2.16 With the exception of a small 19th or early 20th century industrial warehouse within the site, which possesses some historic interest, the existing buildings on the site detract from the appearance of the conservation area, at odds with the traditional fine grain townscape and incongruous with the historic enclosure which characterises the High Street. The current buildings and uses do not contribute to the character and appearance of the conservation area.
- 5.2.17 The Heritage Assessment submitted with the current application demonstrates only a limited degree of harm (at the lower end of the less than substantial scale) arising from this element of the proposals, which is outweighed by urban design benefits, resulting in an overall enhancement to the character and appearance of the Conservation Area.
- 5.2.18 The site does not affect or impact on any World Heritage Sites, Scheduled Ancient Monuments, Registered Battlefields, or Registered Parks and Gardens. There are three listed buildings in the vicinity of the site. These are:
- The Hospital of Sir John Hawkins and Attached Front Railings which is Grade II listed and situated immediately adjacent to the west of the site;
 - 35 High Street, a Grade II listed building, immediately adjacent to the east of the site;
 - St Bartholomew's Chapel, a Grade II* listed building, which occupies a corner plot on the opposite side of High Street, slightly to the west of the site
- 5.2.19 The Heritage Assessment submitted with the current application has extensively tested the potential impacts of the development on nearby listed buildings, finding in each case that there is either a net enhancement to the setting of listed buildings or no material effect.
- 5.2.20 In particular, there will be a net enhancement to the setting of two listed building adjacent to the site, the Grade II Hospital of Sir John Hawkins and 35 High Street. There will also be an enhancement to the setting of nearby Grade II* listed St Bartholomew's Chapel.
- 5.2.21 In wider views, the assessment concludes that the proposals will have a de minimis effect on views towards Rochester Castle and the Cathedral, and in views including Chatham Dockyard, and the collections of listed buildings in both locations.

- 5.2.22 Whilst a constraint the heritage assets are not considered a barrier to the deliverability and availability of the site. Indeed, there is a significant opportunity to repair the High Street frontage in this location.

Archaeology

- 5.2.23 No prehistoric, Romano-British, Anglo-Saxon or medieval archaeological remains have been reported within the site or within 150m of its boundaries. However, the site's location means there is some potential for archaeological finds and an appropriate condition requiring an archaeological mitigation scheme would be appropriate. This should not prevent allocation of the site for development. Therefore, this is not considered a constraint to development.

Ecology

- 5.2.24 The site currently comprises a brownfield site. An Ecological Appraisal has been undertaken. This found that the habitats present on site are of low ecological value and do not form a constraint to the proposals. The only exception is the mudflats, which form a priority habitat type, but which are proposed to be retained in any event.
- 5.2.25 There are few opportunities for protected species on site and no evidence of protected species was recorded during the survey work. Appropriate mitigation measures are proposed to safeguard nesting birds and foraging and commuting bats, which may be present in the wider area.
- 5.2.26 Part of the site overlaps with the statutory designated Medway Estuary Marine Conservation Zone (MCZ). In order to safeguard Medway Estuary MCZ, it is proposed that any works affecting this habitat (such as piling or reinforcement of the river wall) are subject to a specific method statement detailing measures to ensure the habitat is safeguarded. KCC Ecology have confirmed that the development of the site would be acceptable subject to appropriate conditions.
- 5.2.27 The assessment considered that a net gain to biodiversity was achievable.

Deliverability, Availability and Suitability

- 5.2.28 For sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.

- 5.2.29 Availability is essentially about confirming that it is financially viable to develop, and viability remains a central consideration throughout plan making. The site is currently allocated for residential-led development.
- 5.2.30 The continued identification of the site by the Council as an appropriate brownfield site for residential development since the adoption of the current local plan in 2003 and through subsequent Land availability assessments, and brownfield land registers combined with the sustainable location on the High Street demonstrates the site is suitable for development. The current planning application, although being held in obedience demonstrates that the site is available.
- 5.2.31 Given the quantum of housing need in Medway the council will increasingly be likely to be reliant on additional uplift in housing in the more sustainable locations in the urban areas of the Medway Towns and their regeneration sites. The redevelopment of site FP11 would provide opportunity to maintain an existing allocation for residential lead development that is achievable over the next plan period that will help go some way to meet Medway's housing needs in a sustainable location.

5.3 SUMMARY

- 5.3.1 Site FP11 has capacity to deliver circa 100 residential units providing opportunities for residential development within a sustainable High Street location close to local services and transport networks. The redevelopment of the site would make the most effective use of land in accordance with paragraph 119 of the NPPF and boost the supply of homes in accordance with paragraph 60 of the NPPF.

6 PREFERRED SPATIAL STRATEGY

6.1 PREFERRED SPATIAL STRATEGY

- 6.1.1 As is evident from Table 1 of the consultation document that no single development scenario supplies enough homes to meet the Councils 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 "a mixed approach of the 4 residential development options" allowing for urban regeneration sites to deliver a high proportion of the dwellings, required to create the sustainable and resilient communities as per the Plans vision. In identifying our preferred option, we have also considered the pros and cons of the other development options.

Option 1 - Urban Regeneration

- 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 set out within Section 4, there are concerns raised regarding the deliverability of some of these sites. The availability and deliverability scenarios around brownfield are generally complex. Given delivery rates it is understood that such sites would make up a significant component of the housing land supply, after the first 5 years of the Local Plan being adopted because of the complexities involved with such sites coming forward.

6.2 SUMMARY

- 6.2.1 To meet Medway's identified housing requirement in full, housing will need to be allocated drawing on several of the four options for development rather than an individual strategy. It is considered that Option 3 Rural Development need to be relied upon less due to deliverability concerns of the development of the 5,000 dwellings that were part of the Hoo development framework due to the loss of HIF funding. Aligned with this are sustainability concerns around some of the smaller rural settlements on the Hoo peninsula. The Green Belt is limited in Medway so can only take a small portion of the development. Therefore, urban regeneration sites and suburban growth need to take more of the burden for meeting the Council's housing and employment needs.

7 CONCLUSIONS

- 7.1.1 The overall Vision for Medway partly accords with Paragraph 15 of the NPPF setting out the economic, social and environmental priorities for the Local Plan to facilitate Medway becoming a leading regional city. However, the vision is silent on the requirement of Paragraph 15 of the NPPF to require up-to-date plans to provide a framework for addressing housing need. Delivering homes, new neighbourhoods and communities underpins economic investment, social and environmental priorities as it is a catalyst for place making, which is at the heart of Medway's vision to become a leading regional city.
- 7.1.2 To support a vision that includes a framework to deliver housing to meet local needs it is essential to have a strategic objective to support the delivery of homes, the need for housing as it is the underlying catalyst from creating the sustainable, resilient and economically driven aspiration for Medway to become a leading regional city. Therefore, a fifth objective is required within the emerging Local Plan at Regulation 19 stage of development to address housing need in Medway to deliver the vision of the Local Plan.
- 7.1.3 The Grays of Chatham Site (Ref FP11) is a brownfield site identified within the Stage 1 LAA and has been shown through this representation to be available, deliverable, suitable and within a sustainable location for residential development for circa 100 residential units to help meet Medway Council's needs. The site has the potential to start delivering homes within the first 5 years of the Plan period (2022-2027). Given that the site is brownfield, available, suitable, and deliverable within the first 5 years of the plan given the fact that there is a live planning application on the site. The site should be a priority for allocation in the emerging Local Plan as an Urban Regeneration Allocation site.

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MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE

Brompton Farm, Strood

LAA REF: SNF3
OPUS SUBMISSION FORM REF: 292
RESPONDENT ID REF: 365
REGULATION 18 SUBMISSION ID: ID: 1690

CLIENT: BELLWAY HOMES LTD

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Appendix 1 – Illustrative Masterplan

Appendix 2 – Transport Technical Note (Prepared by DHA Transport, October 2023)

Appendix 3 – Green Belt Review

1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

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

1.2 SUMMARY

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

- Plan to meet its full objectively assessed need. The Council has persistently under delivered against its housing requirement over the last 36 yrs, 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 as 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 (Green Belt release at Brompton Farm Strood) 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 7th 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 is highly formative to the distribution of growth and selection of housing sites.

3.2 SUMMARY

- 3.2.1 The strategic objectives as currently drafted do not provide a “Sound” basis to inform the development strategy, site selection or future planning policies, where they fail to set out the amount of development that is to be planned for. This is fundamental to informing the spatial strategy and policy making, especially in respect of setting strategic policies (NPPF, para 20). The objectives must therefore either be expanded or a new objective added which sets out that the Plan seeks to deliver its full objectively assessed need as a minimum (NPPF, para 11b). 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 |
| 1986/87- 2021/22 | 27,407 | 35,727 | -8,320 |

TABLE 3.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

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

4.2 HOUSING SUPPLY

- 4.2.1 The consultation document sets out the need for 1,667 homes per annum, equivalent to 28,312 homes up to 2040 (circa 28,500 homes). The below section 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 refer 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 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

- 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 in 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 sites 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

- 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

- 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 |
| Total potential supply | 38,216 | 27,674 | 10,182 |

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 – LAND AT BROMPTON FARM, STROOD

5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

- 5.1.1 The site SNF3 has been promoted through Medway's previous Regulation 18 consultations and Call for Sites exercises. Site SNF 3 comprises 44.6ha of Greenfield land in the Green Belt between Brompton Road to the south and Hasted Road (the A289) to the north and Gravesend Road to the west.
- 5.1.2 An Illustrative Masterplan (**Appendix 1**) supports the submission and shows how the development could come forward. And has been based off the following opportunities below (shown on Figure 5.1):
- Potential new vehicular access into the site from Gravesend Road and a secondary access from Strodes Close;
 - Retention of the existing public rights of way network across the site and the creation of further pedestrian and cycle links within the site to increase permeability and access to the countryside north of the A289;
 - The creation of a self-contained neighbourhood with its own identity and a strong sense of place;
 - The provision of a good quality public realm with extensive areas of open space including woodlands, wildflower meadows, a community orchard and green fingers;
 - The provision of a neighbourhood centre with small retail units and a medical hub to serve the new community;
 - Potential provision of a school to serve the new neighbourhood and surrounding areas;
 - Ecological benefits through the provision of woodland and pond habitats and green corridors through the development; and
 - Opportunities for play and exercise including areas of linked open space with a variety for play opportunities and a fitness trail with exercise stations.



FIGURE 5.1 OPORTUNITIES PLAN

- 5.1.3 The site benefits from vehicular access via Gravesend Road, Brompton Farm Road and Stonebridge Lane. The site is within close proximity to Strood (1.6 miles) and Higham train station (2.6 miles). The site benefits from easy access to the strategic road network via the A2.
- 5.1.4 The nearest railway station is Strood with regular services to Rainham, Faversham, Luton, St Pancras International and Tonbridge amongst others.
- 5.1.5 Given the locality of the site with its proximity to Strood on the edge of the existing urban area and access to the strategic road network and mainline railway stations the site, whilst being in the Green Belt, provides an attractive opportunity for the following (as identified on the Opportunities Plan (Figure 5.1 above):

- Up to 17 hectares of accessible Open Space;
- Extensive pedestrian and cycle routes;
- Retention of existing Public Right of Way network;
- High quality public realm;
- Children's play areas;
- Fitness Trail;
- Community orchards and allotments;
- Small retail units;
- A medical hub;
- A new school;
- New meadow, wooded and wet habitat areas; and
- New homes including affordable provision and self-build options.

5.2 WHY DEVELOP THE GREEN BELT? (GREEN BELT ASSESSMENT)

- 5.2.1 Paragraph 142 of the NPPF sets out the criteria for reviewing Green Belt and the need to promote sustainable patterns of development. Stating that:

Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.

- 5.2.2 As demonstrated in paragraph 5.1.1 the site is with close proximity to Strood (1.6 miles) and Higham (2.6 miles) train stations providing HS1 and other mainline train connections to London and the southeast. The site benefits from easy access to the strategic road network via the A2. Therefore, it is considered that the site is well served by public transport with the ability to improve bus connections to the site given the scale of the proposed development at the site.
- 5.2.3 The Gravesham emerging Local Plan proposes to allocate a potential for a new settlement option on the boundary of Medway immediately to the north of site SNF3. This is also a Green Belt location and demonstrates that the site has the potential to be within the proximity of other sustainable sites outside of Medway which could positively impact the occupants of the dwellings.
- 5.2.4 Moreover, Gravesham have identified 2,000 dwellings from its potential supply that need to be brought forward by Medway to meet their housing need. This site is in an ideal location close to Gravesham and its Housing Market Areas to help meet a proportion of the supply by delivering 800 of the 2,000 units required.

- 5.2.5 The allocation SNF3 is being developed collaboratively with the land promoters of site SNF1 on the opposite site of Gravesend Road. The Illustrative masterplan (**Appendix 1**) shows how the sites can come forward to provide new neighbourhoods on the northern edge of Strood including appropriate road improvement works/access off Gravesend Road.
- 5.2.6 Given the above, site SNF 3 is considered to be within a sustainable location and within a location that would have the ability to meet Medway's housing need as well meeting the need for Gravesham given its proximity to the neighbouring authority. As such it should be allocated as a Green Belt release site in the Regulation 19 Local Plan.

Green Policy Assessment

The NPPF at paragraph 138 sets the five purposes of the Green Belt. The below assessment breaks the proposed allocation assessment down using the five purposes of the Green Belt.

a) To check the unrestricted sprawl of large built-up areas

- 5.2.7 Whilst the Green Belt seeks to check the unrestricted sprawl of large built-up areas and the coalescence of settlements.
- 5.2.8 The site is on the urban edge of Strood where the Green Belts openness is impinged on by the A289 and provides a physical barrier restricting/ limiting the growth of any settlement.
- 5.2.9 A well-planned strategy for Green Belt review/release in Medway including at site SNF3 Site is not considered to lead to any future risk of unplanned encroachment into Green Belt and countryside. The site provides a logical Green Belt release site located on the existing urban edge of Strood where site SNF3 creates a logical and well-planned extension to the existing settlement with site SFN1 following a similar pattern of development that has taken place on land to the north-east of site SNF3.

b) To prevent neighbouring towns merging into one another

- 5.2.10 If the site were to be released from the Green Belt, there would remain a physical divide/separation of 1.25 km between the closest settlements thus including the site is an allocation within a regulation 19 Local Plan would not prevent the coalescence of settlements.
- 5.2.11 As set out above the site contained by the A289 which provides a physical barrier preventing the merging of any existing settlements.

c) To assist in safeguarding the countryside from encroachment

- 5.2.12 Site SNF3 is semi-rural in character is the last remaining parcels of Land within the boarder of the A289 which represents an ideal barrier for urban sprawl. The A289 also is an urbanising feature. As such the proposed allocation would protect more open areas of Medway's countryside from risk of development.

To preserve the setting and special character of historic towns

- 5.2.13 The settlement edge of Strood adjacent to the site has no significant history or special character that would be exceptionally impacted/lost from the development of If the site were to come forward.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 5.2.14 As stated in section 4 above Medway only has a limited supply of brownfield land identified for regeneration in this plan period. Greenfield land/Green Belt land is generally less constrained requiring less mitigation measures for works to commence as such sites can come forward quicker. Thus, it has been shown that the emerging Local Plan is maximising its urban regeneration capacity but still needs to deliver residential dwellings.

5.3 OTHER CONSIDERATIONS

Trees

- 5.3.1 Trees and hedgerows lie within and around the edge of the submission site. 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

- 5.3.2 Two Public Rights of Way cross the site. These can be incorporated into the site without constraining development potential, as demonstrated by the accompanying illustrative masterplan.

Flood Risk

- 5.3.3 The site lies within Flood Zone 1 and is therefore not at risk of flooding.

Contamination

- 5.3.4 The site is not a greenfield site and is not considered to have a likely presence for contamination and this would therefore not constrain development.

Archaeology and heritage

- 5.3.5 There are no known heritage assets with or adjacent to the application site. The site is not known to have a presence for archaeology. Mitigation measure and or a watching brief for any potential archaeological finds can be secured by condition if the Council consider this appropriate at any future planning application stage of development.

Noise and air quality

- 5.3.6 The site is not within an Air Quality Management Area and so this is not considered to present a constraint. Any noise or air quality-related constraints can be addressed through the master planning process of the development.

Agricultural land value

- 5.3.7 Medway have previously considered the site is best and most versatile agricultural land. This is disputed through the historic uses on the site. Given the need for housing in Medway and the sustainable nature of site SNF3 the need for housing is considered to outweigh any current concerns BMV land. An agricultural land classification assessment can be submitted to support the application to demonstrate the site is not BMV land as defined by Annex 2 of the NPPF.

Deliverability

- 5.3.8 For sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.

Availability

- 5.3.9 Availability is essentially about confirming that it is financially viable to develop and viability remains a central consideration throughout plan making. We can

confirm that 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.

Suitability

- 5.3.10 For reasons set out in this section of the representation site SFN3 is considered suitable for development. In summary, the site borders the currently defined town centre confines and would form a natural, logical and sustainable extension.
- 5.3.11 Residential development on this site would make a useful contribution to the required housing supply for the plan period for Medway given that it needs to meet the needs of Gravesham Borough Council.
- 5.3.12 Finally, the site is not constrained by access and infrastructure (as demonstrated in Appendix 2 – Transport Technical Note and indicative access drawings), flood risk, pollution or contamination.

Achievability

- 5.3.13 The site is in two separate ownerships. However, the site is a greenfield with limited constraints on the site other than cannot/ have not already been proposed to be mitigated as shown on the accompanying illustrative masterplan. The legal agreements and covenants would not prohibit the ability to bring forward. Therefore, the site is greenfield development in a sustainable location that can be delivered within the early years (years 1-5) of the plan period.

5.4 SUMMARY

- 5.4.1 Given the location of the site on the urban edge of the Strood and served by public transport and the ability for this to be improved combined with the need for housing in Medway (with the concerns over the viability and deliverability of rural settlement expansion on the Hoo Peninsula and the Hoo development framework due to the loss of HIF funding and the complex viability issues surrounding urban regeneration sites in and around Chatham, Strood and Rainham) site SNF3 is considered to be an appropriate site for Green Belt release in accordance with paragraph 142 of the NPPF considering the local context to meet Medway's and Gravesham's housing need.

6 PREFERRED SPATIAL STRATEGY

6.1 PREFERRED SPATIAL STRATEGY

- 6.1.1 As is evident from Table 1 of the consultation document that no single development scenario supplies enough homes to meet Medway's 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), with a combination of all the options is likely to be required and including allowing or Green Belt release sites to allow Medway to meet its housing needs and the needs of Gravesham Borough Council. In identifying 'our' preferred option, we have also considered the pros and cons of the other development options.

Option 1 - Urban Regeneration

- 6.1.2 This focuses on urban sites within the Medway Towns (Chatham, Strood and Rochester) high streets and waterfronts. For the reasons section under Section 4, significant concerns are raised regarding the deliverability of many of these sites. In general, we do not object to the redevelopment of brownfield sites. These sites are only part of the overall delivery in Medway and given their historic delivery rates and identified deliverability and viability issues not all the identified sites in the Stage 1 assessment will come forward.

Option 2 - Suburban Expansion

- 6.1.3 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.
- 6.1.4 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

- 6.1.5 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.

Option 4 - Green Belt Release

- 6.1.6 These are shown as sites adjacent to the administrative areas of Gravesham Bourgh 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 is proposing urban extension or standalone new settlements to meet their housing need.
- 6.1.7 Medway's Green belt represents 5% of the administrative area. Whilst the need for Green Belt release only forms part of the potential supply and should not be relied upon to fully meet the housing need. Site SNF 3 represents a logical extension to Strood On land that is enclosed by the A289 which acts as a physical barrier to contain urban sprawl and the coalescence of settlements.
- 6.1.8 Paragraph 142 of the NPPF Identifies Local Planning Authorities sets out the criteria for reviewing Green Belt as part of preparing Local Plans. Stating that:
- Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport.*
- 6.1.9 Section 5 above sets out how site SNF3 meets the above criteria for the Green Belt release site for housing development due to the site's location on the urban edge of the Strood with it being well served by public transport and the ability for this to be improved, the need for housing to meet the 28,312 homes required by Medway and an addition 2,00 homes by Gravesham Borough Council and any additional need from Tonbridge & Malling. As set out above there are also concerns over the deliverability of Options 1-3 on the scales Medway proposes over the viability and deliverability of rural settlement expansion on the Hoo Peninsula and the complex viability issues surrounding urban regeneration sites.
- 6.1.10 Therefore, Option 4 should be part of a rounded approach from Medway to deliver decent housing in a sustainable location to meet the needs of its population. The deliverability of homes across the Green Belt, urban, suburban and rural locations will facilitate these needs and ultimately help achieve the revised "Vision" of the Local Plan proposed in Section 3.

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.

6.2 SUMMARY

- 6.2.1 To meet the identified housing requirement in full, housing will need to be allocated drawing on all of the four options for development rather than an individual strategy. This includes including allocating housing sites within the Green Belt.

7 OTHER COMMENTS ON THE LAND AVAILABILITY ASSESSMENT

- 7.1.1 Site SNF3 (Land at Brompton Farm) is being promoted with awareness of SNF1 coming forward through the Local Plan process. The Illustrative Masterplan at **Appendix 1** shows how the Site SNF3 at Brompton Farm can come forward whilst allowing the neighbouring site SNF 1 to also be delivered. The Illustrative masterplan shows how the access and highway improvements through the provision of a staggered signalised crossing will allow appropriate access to both sites SNF3 and SNF1.

8 CONCLUSIONS

8.1 OVERALL SUMMARY

Overall Summary

- 8.1.1 The overall Vision for Medway partly accords with Paragraph 15 of the NPPF setting out the economic, social and environmental priorities for the Local Plan to facilitate Medway becoming a leading regional city. However, the vision is silent on the requirement of Paragraph 15 to require up-to-date plan to provide a framework for addressing housing need. Delivering homes and new neighbourhood and communities underpins economic investment, social and environmental priorities as it is a catalyst for place-making which is at the heart of Medway's vision to become a leading regional city.
- 8.1.2 To support a vision that includes a framework to deliver housing to meet local needs it is essential to have a strategic objective that supports the delivery of homes, and the need for housing as it is the underlying catalyst for creating the sustainable, resilient and economically driven aspirations for Medway to become a leading regional city. Therefore, a fifth objective is required within the emerging Local Plan at the Regulation 19 stage of development to address housing needs in Medway to deliver the vision of the Local Plan.
- 8.1.3 Considering the above assessment of the 447 Stage 1 LAA sites across the four residential development options that seek to deliver the 28,312 homes across the Plan period there are concerns over the deliverability of many of the sites across all the options proposed in the consultation document. The reasons are due to:
- Deliverability concerns over the loss of HIF funding and the sustainability of sites in rural development areas;
 - The development of Suburban Growth areas that are currently identified as sites of landscape sensitivity/importance;
 - Potential viability concerns over the deliverability of sites in all the options due to the cost of remediation measures, the impact of mandatory BNG (from January 2024 for major development sites); and
 - Sites deliverability being challenged due to the age/ number of lapsed consents on the site.
- 8.1.4 Given the concerns raised above and the absence of any further sustainability appraisal of the sites by the Council to date a conservative estimate is that 10,182

homes can be removed from the potential Housing Supply for the plan period before the Council have discounted any sites at Stage 2 and 3 of the LAA through the sustainability appraisal which would undertake a full sustainability appraisal of the sites submitted.

- 8.1.5 What is not clear at this moment in time is how the removing of the HIF funding will impact the development of the Hoo Peninsula and existing rural settlements on the Hoo Peninsula. Therefore, there are still some ambiguities about how many homes will have to be discounted from the rural development category of the potential Housing Supply for Medway.
- 8.1.6 Given the site SNF3 location on the urban edge of the Strood with it being well served by public transport and the ability for this to be improved, the need for housing with the concerns over the viability and deliverability of rural settlement expansion on the Hoo Peninsula and the Hoo development framework due to the loss of HIF funding and the complex viability issues surrounding urban regeneration sites in and around Chatham, Strood and Rainham.
- 8.1.7 Following the assessment of the opportunity the site has to help meet Medway's housing need in Section 5 the site is considered to be an appropriate site for Green Belt release in accordance with the NPPF paragraph 142.

Conclusion

- 8.1.8 Site SNF3 is sustainable, achievable and deliverable within years 1 to 5 of the Local Plan given its greenfield nature and proximity to Strood. The site can help meet the identified housing needs of Medway that may not be achievable otherwise given the authorities constraints and loss of HIF funding without the use of Green Belt sites.
- 8.1.9 Bellway would support a preferred development strategy that releases Green Belt land for residential development due to the speed in which Greenfield sites can be released to meet the housing requirements of the Local Plan in the first 5 years of the plan period. However, Bellway acknowledges that to deliver the scale of housing required strategic approach delivering dwellings across all the categories is required to meet Medway's housing need for the plan period.
- 8.1.10 Therefore, the site SNF3 should be allocated in a draft Regulation 19 Local Plan as an allocated site for Green Belt release.

From: Martin Rose [REDACTED]
Sent: 31 October 2023 22:31
To: futuremedway
Subject: Local Plan comments

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Reg 18 email Responses

Dear Local Plan team,
I had little joy with the online consultation platform. I would like to submit these comments below via email if possible.

Kind regards,
Martin Rose

Local Plan comments,

Martin Rose, Rainham

I am a transport planner with 17 years' experience, with some specialism in land use-transport interaction. My comments below are made in a personal capacity:

Sporadic, uncoordinated development in recent years

In this example I will refer to Rainham but it could be applicable elsewhere in the Medway area. Parts of the Rainham North ward, around Otterham Quay Lane and Lower Rainham Road have seen significant amounts of new housing development over the past five years. Building new homes for people who need them is not necessarily a bad thing, but the new housing does not appear to have included accompanying social infrastructure, principally: primary school places, expansion of GP services, local shopping and bus services. Worst of all, there appears to be no new footpath provision.

A very good example of this is the Bloomfields estate on the northern end of Station Road, Rainham. Station Road had suffered from narrow footpaths for a very long time. When the field on the north east of the road was developed into Bloomfields there was a fantastic opportunity to devote more space to pedestrian movement, and yet somehow the old narrow, not fit-for-purpose footways were retained. It was unfathomable why the Council didn't seek such a simple measure, which would have only taken a few inches off the front gardens of some new houses, everyone lost out as the road remains an unpleasant walking environment, further encouraging local trips by car.

Transport and land use policy –

Facilitating "15 Minute Neighbourhoods" (or equivalent)

New development should aim to fulfil the ambition of the 15 Minute Neighbourhood (15MN) – another name may be more appropriate, in view of the misinformation surrounding the concept online. Places like Twydall, Park Wood and Walderslade although remote from their town centres, exhibit some characteristics of 15MN – key social infrastructure is available for most people in these areas within a 15 min walk of their front door. However, the availability of decent roads, parking and low residential densities contributing to poor public transport provision means that sadly, many do still choose to drive.

Cycle infrastructure

The Council and developers should build more pedestrian and cycling infrastructure: off-road cycle lanes, cycle parking and safe road crossings in the new developments and into the existing road layouts to encourage sustainable travel behaviour, particularly as new residents offer a chance for new habits to be created.

Severance

The road network can be a hostile environment to pedestrians and cyclists, with examples near Bowater roundabout, or Dock Road and the Northern Link Road around the Universities. The severance these roads cause must surely reduce local quality of life and contain / suppress the economic benefit the universities could be providing to the Towns.

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-
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Poor public transport

The poor state of public transport is recognised in the consultation document and there are many issues which can be resolved outside of the Local Plan to improve the frequency and speed of bus services. However, services will only improve significantly with policies to increase density of development to increase demand and reduce competition for road space.

Recognising the value of our land

Medway has lots to offer, its potential as a place to live and invest is massively overlooked as a result partly of its urban grain and polycentric settlements. However the Council needs to be a much stronger force in encouraging and insisting upon greater levels of sustainability in new development.

s.106 / tariffs

Across the South East of England currently there is relatively little space to build new housing. Medway and other parts of North Kent are considered to have some capacity available, although less than before – as seen in local house prices rapidly climbing towards the regional average.

Medway Council should recognise the value the area has to the development sector – it seems that the Planning department doesn't recognise its negotiating position, possibly due to weak support from politicians during the era of Conservative control. With new leadership, whilst recognising commercial viability, the Council should be increasing the level of s.106 and any other levies available from developers and pursuing them for every last penny of it.

An imaginative approach to design and urbanism

St Mary's Island – although benefitting from scale and public subsidy, the success of St Mary's Island as a good example of place-making, with an emphasis on pedestrians and cyclists, and decent design should not be overlooked. I hope the Council can use SMI as an example to learn from on the Hoo Peninsula if land is released there for development.

Effects on existing communities

Moreover, recognition is needed of the impact of development on existing communities of the construction of new development – to use another example from Rainham North, Lower Rainham Road has been subject to numerous

closures over recent months, increasing congestion elsewhere in the town and adding to journey times for local people. Development offers existing communities nothing in exchange – the development of new social infrastructure (whilst designated a mitigation, may often be perceived as an improvement) may help soften the impact of new housing. There is no evidence of such schemes in Rainham North. In fact, the children's play area on the housing estate on Station Road includes a large sign informing non-residents that they are not allowed to make use of it. Further evidence that without a robust planning authority comprising strong political leadership, technical expertise and well-formed policy, developers are allowed to ride roughshod over existing residents of an area.

Neighbouring districts

Quality of life in Medway is at risk from the urban fringe being developed by neighbouring local authorities e.g. Lidsing / Bredhurst (Maidstone BC) and Rainham North (Swale). These plans should be challenged at all costs, and Medway's own planning should not facilitate these potentially disastrous plans – particularly Lidsing. Developing parts of the Capstone Valley would only fuel that dreadful idea of a new 'village' near the M2.

Efficient use of land:

Town centre viability

To arrest the decline of the high street, I propose seeking to make the designated zones for retail in Chatham and Gillingham smaller than they are at present. In doing so, the remaining space will fill more vibrant and welcoming to sceptical local residents who currently have the means to stay away and use other facilities. I have set out a rationale below.

I would suggest 40-50% of the space was released for other activities, e.g. Gillingham High Street west of Canterbury Street and Chatham High Street east of Batchelor Street (but also releasing the old Debenhams / Alders site). The space released could be converted to decent family housing with parks, play areas and schools. Size, massing and scale of Rochester Riverside, especially if the old Tesco and bingo hall were included in the scheme, along with a re-alignment of Brook Street.

Chatham and Gillingham's high streets are too long for the purposes they currently serve and are in a spiral of decline. Vacancy levels and general degradation mask the usefulness of these local assets, and deter those with disposable income to spend money and time in those centres, instead preferring out of town outlets or online shopping.

Also, there seems to be a surplus of car park land in both town centres, can more be released for development?

There has been a massive reduction in demand for some high street shopping facilities with a transfer to online or out-of-town facilities. In terms of these trends, previous planning decisions by the Council to allow the growth of sites such as Horsted Retail Park and Dockside, and local online distribution centres have hastened the decline of the traditional high street. Further development decisions on out-of-town or online retail should recognise the harm their approval would have on traditional urban centres.

Medway suffers from the polycentric nature of the settlement. Compare the quality and massing of Reading or Brighton centres (both serving similar populations to Medway) – part of their success is due to the presence of a single dominant centre, where core comparison retail functions have been consolidated. With this in mind, thinking more radically, could Gillingham town centre be scaled back even more significantly, replaced by housing, with functions relocated to Chatham, along with some relocated functions from out-of-town activities?

On the other hand, I'd suggest Rainham, Strood and Hempstead Valley are useful assets, public transport, walking and cycling connections to these locations should be prioritised.

-

Better use of low density suburbs

Much of Medway's outer areas are low density and difficult to serve with public transport. More consideration should be given to the scope to assemble land from private gardens (subject of course to availability of land and local approval) to develop more intensive housing in such areas. However, any intensification of suburban areas needs to be combined with improved public transport links.

Biodiversity and agriculture

Some of the land around Medway is extremely rich fertile farmland, if lost then it would be hugely regrettable for our food security and preservation of Kent's remaining agricultural heritage. Agri-businesses looking to make high profits from selling farmland should be warned this is not possible, with a robust local plan and clear zoning.

Similarly the biodiversity of small sites should not be overlooked. Fields which appear scrubby and unproductive may include numerous floras and faunas not seen elsewhere. Careful investigation should be undertaken of these sites and developers forced to fulfil their obligations over biodiversity net gain.

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MEDWAY COUNCIL REGULATION 18 CONSULTATION RESPONSE

LAND WEST OF BERWICK WAY AND MANOR FARM

**LAA REFS: SR25 AND SR27
CALL FOR SITES OPUS SUBMISSION FORM REF: 254
CALL FOR SITES RESPONDANT ID REF: 403**

REGULATION 18 SUBMISSION ID REF: ID 1742

CLIENT: HERITAGE DESIGN & DEVELOPMENT TEAM LTD

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Appendix 1 – Illustrative Masterplan of Site SR27 and SR25

Appendix 2 – Transport Feasibility Assessment

Appendix 3 – Site SR27 Site Plan

1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

- 1.1.1 These representations have been prepared on behalf of Heritage Design & Development Team Ltd
- 1.1.2 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.
- 1.1.3 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 "Land West of Berwick Way and Manor 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).
- 1.1.5 These representations must be read alongside the on-line form/platform which has been completed, together with the accompanying promotional document

1.2 SUMMARY

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

- Plan to meet its full objectively assessed need. The Council has persistently under delivered against its housing requirement, resulting in a significant housing need, both market and affordable;
- Extend the Plan period until at least 2042, to ensure it covers the required 15yrs at the point of adoption (NPPF, para 22);
- Amend the "Vision" (para 3.1) to include reference to housing. Whilst the "Vision" in general is supported, it is a significant failing that it does not mention the delivery housing of a significant element of the Plan. In not addressing the need to deliver housing as an integral part of the "Vision" it fails to accord with the NPPF (para 15);
- Amend the "Strategic Objectives" to include as an objective on its own the need to deliver housing to meet identified needs. This is necessary to accord with the NPPF (para 20) which requires the inclusion of strategic policies that set out the overall strategy and pattern for spatial growth, including for the provision of housing. The "Strategic Objectives" can therefore not be silent on this matter.
- Ensure the potential supply of housing identified is deliverable and reliable, especially within the early part of the Plan period. Concerns are raised that the identified housing capacity of the respective housing pipelines identified are not accurate and/or are not deliverable within the Plan period. A wide range of sites including urban greenfield sites therefore need to be released for development to meet identified needs such as "Land West of Berwick Way and Manor Farm" which would secure community benefits, including positively addressing the constraints identified in the consultation document.
- There is no one spatial strategy that can deliver the Council's full housing need. However, the spatial strategy must include the identified "Urban Regeneration" in the LAA.
- This Representation and appended Illustrative Masterplan (**Appendix 1**) Transport Feasibility Assessment (**Appendix 2**) and Site Plan (**Appendix 3**) demonstrate that the site is suitable for development having regard to the identified opportunities, issues and constraints. As such it can

positively contribute to the supply of sites as an Urban Regeneration site expending Finsbury. The sites should therefore be allocated for development.

1.3 STRUCTURE OF THE DOCUMENT

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

- **Chapter 2** - Provides feedback on the overall vision of the Local Plan;
- **Chapter 3** - Provides commentary on the strategic objectives of the Local Plan;
- **Chapter 4** - Provides a response to the developing spatial strategy development needs of Medway, the housing supply position, pipeline development, windfall Supply and any other potential allocations;
- **Chapter 5** - Provides an overview of the site setting out why the sites “Land West of Berwick Way and Manor Farm” should be allocated;
- **Chapter 6** - Sets out the preferred spatial strategy and why this represents the most suitable and thus “Sound” option;
- **Chapter 7** - Provides a response on the land availability assessment; and
- **Chapter 8** - Sets out the overall conclusions.

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

2 VISION

2.1 THE PLAN PERIOD

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

2.2 COMMENTS ON THE PROPOSED VISION

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

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

2.2.5 NPPF (para 15) states that:

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

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

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

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

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

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

infrastructure, such as transport, schools, healthcare and open spaces, has supported house building to provide a good quality of life for residents.

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

2.3 SUMMARY

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

3 STRATEGIC OBJECTIVES

3.1 COMMENTS ON THE STRATEGIC OBJECTIVES

- 3.1.1 The consultation document sets out four strategic objectives to positively plan for the development and infrastructure needs of Medway whilst conserving and enhancing the natural, built and historic environment. The objectives are:
- Prepared for a sustainable and green future;
 - Supporting people to lead healthy lives and strengthen our communities;
 - Securing jobs and developing skills for a 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, but it does not set out how much. This is a determining factor in deciding what is the most appropriate spatial strategy and should inform the basis of future strategic policies, as required by the NPPF (para 20 and 23). In accordance with the NPPF (para 11), this should also reflect as a minimum the objectively assessed need (28,500 new homes or 1,667 pa)
- 3.1.4 In the absence of clearly setting out what the housing requirement is and whether the Plan is looking to meet its need (which it should, see Section 4), the process of using the stated objectives to inform the Council’s assessment of different sites and locations for development cannot be considered as “Positively Prepared” or “Justified”, contrary to the NPPF (para 35).
- 3.1.5 The “Strategic Objectives” must therefore be either expanded to include the amount of housing that is to be planned for, which must reflect the objectively assessed need as a minimum (NPPF, para 11b) or a new objective added which identifies this.
- 3.1.6 With regards to the spatial objectives more generally, the general principles are supported. However, they further highlight the need for the amount of

development to be planned for must be expressed as an objective, since many of the other objectives are dependant on the delivery of housing including the ambitions for improved employment floorspace and higher value employment opportunities, which are also reliant on providing enough housing.

- 3.1.7 More generally, the objectives also only talk about development on brownfield land as part of its regeneration objectives. The objectives do not directly address the need to release greenfield land for development. This is misleading, since the release of greenfield sites is essential to meeting the objectives of the Plan and therefore must be referenced for clarity.
- 3.1.8 The consultation document (para 5.11) further mentions that the “*the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham’s housing needs, following a request from the neighbouring authority*”. Again, the strategic objectives are silent on this matter, and it must be clarified whether the Council intends the Plan to help address this need, as a matter which highly formative to the distribution of growth and selection of housing sites.

3.2 SUMMARY

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

4 DEVELOPING A SPATIAL STRATEGY

4.1 DEVELOPMENT NEEDS

- 4.1.1 The consultation document (para 5.3) sets out the development needs of Medway, identifying a current housing need of 1,667 homes pa or circa 28,500 over the Plan period (2022-2040). Para 5.4 casts doubt about whether this is an appropriate figure. However, it is considered essential that the Plan seeks to deliver development that meets Medway's objectively assessed need in full.
- 4.1.2 As evidenced in Table 3.1, the Council has consistently failed to deliver against its housing requirement since 1986, with it last meeting its requirement in only two consecutive years in 2008/08 and 2009/10. This has no doubt lead to the current acute shortage of housing in Medway and current identified need. During this time the need for affordable housing has also become even more acute, with an identified annual need for 870 affordable homes pa (Medway Local Housing Needs Assessment, October 2021, prepared by Arc4).
- 4.1.3 The growing need for both market and affordable housing lends emphasis to the requirement for the Council to plan to meet its full objectively assessed need, as required by the NPPF (para 11b and para 23), supporting the Government's objectives to 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 |
| 1986/87- 2021/22 | 27,407 | 35,727 | -8,320 |

TABLE 3.1 SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

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

Council or any other Council's (as appropriate) i.e Tonbridge & Malling, which also borders Medway.

4.2 HOUSING SUPPLY

- 4.2.1 The consultation document sets out the need for 1,667 homes 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 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, Cliff Woods and Rainham as several of the sites identified in Appendix D have been delivering homes before the start of the identified plan period in 2022. The Council should make it clear through its future evidence base how units delivered before 2022 have not been counted towards the overall supply.
- 4.2.4 Furthermore, it cannot be assumed that each one of these sites will come forward or come forward in full. For instance, consents can lapse or the full development potential of a site is not achieved, for example reserved matters is granted for fewer homes than consented under an Outline permission. Based on previous delivery rates, a discount rate must therefore be applied, allowing for an element of under implementation. As such the full 7,583 homes cannot be relied upon as part of the spatial strategy.

Windfall Supply

- 4.2.5 Windfall development is defined at Annex 2 of the NPPF as sites not specifically identified in the Development Plan.
- 4.2.6 The NPPF (para 71) sets out that:

*Where an allowance is to be made for windfall sites as part of anticipated supply, there should **be compelling evidence that they will provide a reliable source of supply**. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. (**Our emphasis**)*

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

Potential Allocations

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

- Suburban growth;
- Rural development; and
- Green Belt loss.

4.2.12 The remainder of this section analyses the capacity of each category for potential housing delivery identified in the LLA.

Urban Regeneration Sites

4.2.13 Map one of the consultation documents 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 some of this proposed 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;
- The requirement to provide BNG is likely to be a significant constraint to brownfield sites coming forward. 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 likely to impact viability (contributions for off-site provision are very high) or significantly reduce the development potential of some sites.

4.2.15 With the above 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 the previous urban regeneration delivery rates.

- 4.2.16 However, urban regeneration allocation is still considered intrinsic for Medway to meet is housing need as they provide sustainable locations for residential and mix-use communities in the heart of the Medway Towns.
- 4.2.17 Given Medway's constraints to development in urban areas including on brownfield, it is increasingly important that Medway maximise the delivery of long-standing allocations on brownfield land within the special those that are currently allocated but not yet built out.
- 4.2.18 It is acknowledged that the delivery rates of brownfield sites are slower than Greenfield sites so it is anticipated that many of the larger urban regeneration sites may not start delivering the units required until after the first 5 years of the plan period. Thus, there still need to be consideration of other strategic development options.

Suburban growth

- 4.2.19 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.
 - Sites to the north of the settlement confines of Rainham, which have been subject to previous unsuccessful Appeals have also been discounted, including site detached from the urban area, which do not form a logical extension or outpost for development, being unsustainably located.
- 4.2.20 Taking the above into account, it is considered at least 3,123 homes can be discounted from the potential supply of housing.

Rural Development

- 4.2.21 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.

4.2.22 This is the single potential largest supply of housing. The following concerns are raised regarding many of the sites.

- The sites identified around the settlements of Allhallows, the Isle of Grain and Lower Stoke are within the periphery of Medway's administrative area with limited access to sustainable modes of transport and every-day services to meet the needs of the existing and future residents of the settlement. Many of the sites proposed for development in these areas are large and propose a scale of development that is either disproportionate to the settlement and/or is unsustainably located having regard to the Council's strategic objectives;
- The peripheral sites around the edge of Cliffe Woods do not form logical extensions to the settlement in this Plan period given the existing pipeline of development to the south and west of the settlement that have either been granted planning permission all have live planning applications submitted to the Council;
- Development whether it be for future employment, residential or mixed-use development on the Hoo Peninsula is reliant on the existing road network. Medway Council lost its Housing Infrastructure Funding (HIF) of £170 million in July 2023 to deliver the expansion of Hoo. 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 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, especially early in the Plan period

Any strategic development in Hoo is also likely to go beyond this Plan period. As already set out in Section 2, the "Vision" fails to cover the required 30yr period (NPPF, para 22). The "Vision" and the consultation document therefore fails to provide a suitable framework for this scale of development.

- 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.

- 4.2.23 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

- 4.2.24 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.
- 4.2.25 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 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 |
| Total potential supply | 38,216 | 27,674 | 10,182 |

TABLE 4.1 SUMMARY OF DHA ASSESSMENT OF MEDWAY'S POTENTIAL HOUSING SUPPLY

- 4.3.2 In addition, the windfall site allowance set out at para 4.2.7 of this representation and Figure 2 of the consultation document, 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 LAND WEST OF BERWICK WAY (SITE REF SR27)

5.1 OVERVIEW OF ALLOCATION OPPORTUNITY

- 5.1.1 The site is located to the west of Upnor Roundabout, with Medway City Estate immediately to the east. Manor Farm is located to the west of the site, which comprises of three listed buildings: Manor Farm Oast (Grade II), The Manor House (Grade II) & Barn 30 yards south west of the Manor House (Grade I). The site is within the Frinsbury and Manor Farm Conservation Area.
- 5.1.2 Site SR27 (land west of Berwick Way) has been previously promoted through the Council's Call for Sites under reference SR27). The Regulation 18 consultation process provides further opportunities to promote the site for residential development for 31 units, public open space and sustainable drainage. The primary access is to be taken from Parsonage Lane, with the footpaths retained providing pedestrian access to Berwick Way. An illustrative masterplan of how the site could come forward is provided below at Figure 5.1.1 and at Appendix 1.



FIGURE 5.1.1 ILLUSTRATIVE MASTERPLAN OF SITE SR27

- 5.1.3 The site is located in a highly sustainable location. Via Parsonage Lane, residents of the future site would be able to walk through on safe and convenient routes to Strood, Frindsbury. Wainscott is also easily accessible via the footpath on Berwick Way. There are several footpaths providing various access routes, including RS121, RS328, RR6 and RR9. Strood train station is located approximately 1km from the site, providing routes into various London destinations, Gravesend, Medway Towns, Sittingbourne, the east coast and additional destinations.
- 5.1.4 There is a bus stop on Anthony's Way roughly 200m from the site which is served by the 170. The 170 travels between Medway Valley Park and Chatham, and currently has 15 services on a weekday. There are 6 services on a Saturday. There are also regular services from the A228 in Wainscott, 400m from the site. Services include the 191, 193, 197, 652, 692, 693 and 694. Regular services include Chatham, Rochester, Lodge Hill, Strood, Lower Upnor, Cliffe, Grain, Hoo St Werburgh, High Halstow. It is clear that the site has a number of viable sustainable transport measures available, and this is detailed in the accompanying Transport Feasibility Assessment(**Appendix 2**).
- 5.1.5 In terms of local facilities and services, there is a Co-op food store on the opposite side of Anthony's Way. The approved scheme when built out will include a secondary school, which will be highly accessible for residents of the site. Facilities within a 2-mile radius of the site also include McDonald's, The Sans Pareil Public House, Hilltop Primary School, Temple School and the Strood Academy, St. Mary's Medical Centre, Tesco Petrol Station and the All Saints C of E Church.
- 5.1.6 Delivery of a development based on a masterplan that has been landscape led, taking into account, the wider landscape context, including heritage assets, the condition of the site, existing built form, the site's relationship with it and incorporating opportunities for improvement/enhancement should be supported. As already set out in the LAA submission the site is not at risk from flooding nor is it suspected to be contaminated. Whilst the site will be influenced by noise from the adjacent highway network, this does not prevent the Site in coming forward with appropriate opportunities for mitigation to be integrated into the masterplan through buffers and/or plot orientation and design.

The highway technical note appended to this representation further demonstrates that the access points into the Site are feasible and deliverable in accordance with the applicable highway design guidance

5.2 OPPORTUNITIES

- 5.2.1 It is considered that sites such as this would positively respond to the market demand for housing in urban locations. The site is a greenfield site with limited constraints the Site could be built out more quickly. As identified elsewhere, it is also likely to include policy compliant levels of affordable housing unlike some other development scenarios for reasons of viability, contributing to meeting a dire need for affordable homes as well as providing a more varied mix of housing opportunities.
- 5.2.2 As set out in Section 5.1 above the illustrative proposal at Figure 5.1.1 shows the sites is in a sustainable location with future residents able to walk to local facilities and transport nodes offering connections across Medway, Kent and London. The masterplan proposals compliment this, through the provision of additional services and facilities.
- 5.2.3 Overall, the proposals for the Site aligns with the opportunities identified in the consultation document for the delivery of urban regeneration sites.

5.3 ISSUES & CONSTRAINTS

Public Rights of Way

- 5.3.1 A Public Right of Way (PRoW) runs through the site. Nevertheless, efforts have been made in the design of the site so that any impact on the PRoW is minimal, and it can be utilised as a main access road. Visual impact would be inevitable as part of a development of the site.

Heritage Assets

- 5.3.2 Manor Farm is located to the west of the site, which comprises of three listed buildings: Manor Farm Oast (Grade II), The Manor House (Grade II) & Barn 30 yards south west of the Manor House (Grade I). The site is within the Frinsbury and Manor Farm Conservation Area.
- 5.3.3 It should be noted that further detailed work can consider the relationship to the nearby heritage assets. We do however note that careful use of single storey units, road alignment and potentially placement of open space (potentially allotments) would in our submission combine to protect the setting of the assets.

- 5.3.4 Whilst a constraint the heritage assets are not considered a barrier to the deliverability and availability of the site. Indeed, there is a significant opportunity to repair the High Street frontage in this location.

Archaeology

- 5.3.5 The archaeological constraints of the site are not known. However, this should not prevent allocation of the site for development. Therefore, this is not considered a constraint to development.

Landscape

- 5.3.6 The site is located within the Hogmarsh Valley ALLI, however its impact is largely limited owing to its location adjacent to the dual carriageway, the Medway City Estate to the south and in the context of the recently approved hybrid application MC/21/0302. This is not considered a barrier to development at the site.

Ecology

- 5.3.7 The site is a greenfield site. It is noted that a Biodiversity Net Gain of 10% will be mandatory from January 2024. Whilst a constraint it is not considered a barrier to development.

5.4 CONCLUSIONS

- 5.4.1 The above assessment sets out the site is in an opportune greenfield site with limited constraints to development and is available and deliverable site. As such and it can positively contribute to the supply of sites as an urban regeneration site in Frindsbury. Site SR27 should therefore be allocated for development.

6 MANOR FARM SITE REF SR25

6.1 OVERVIEW OF ALLOCATION OPPORTUNITY

6.1.1 Site SR25 Known as Manor Farm occupies Land South Of Berwick Way, East Of Frindsbury Hill And North And West Of Parsonage Lane.

6.1.2 Site SR25 has an extant consent LPA reference MC/21/0302. The Hybrid application was granted consent for:

Hybrid application seeking: - Full planning permission for the construction of a new three-storey secondary school with sixth form and sports block with vehicular and pedestrian access from Frindsbury Hill, together with associated car parking and drop off area, multi-use games area, sports pitches, landscaping and other associated works. - Full planning permission for the part conversion and extension of Grade I Listed Manor Farm Barn and change of use to a wedding venue and conference facility, including conversion and extension of former cattle byres to provide overnight accommodation, construction of single storey detached building for management facilities and construction of a new building to provide additional tourist accommodation with vehicular and pedestrian access from Berwick Way, car parking, landscaping and other associated works. - Outline permission (with Frindsbury Hill access-detailed as part of the full planning permission for the school element) to be considered in detail and all other matters reserved for future consideration for the construction of up to 181 residential dwellings, together with Parsonage Lane access, parking, landscaping and associated works.

6.1.3 The approved application has secured full planning for a three-storey secondary school and sports block, with multiple pitches and the part conversion and extension of Grade 1 Manor Farm Barn and change of use to wedding venue and conference facility. Outline consent was also secured for up to 181 dwellings. Development of the remaining section of unapproved land under the Manor Farm ownership (this site) is considered to be acceptable in respect of these heritage assets, in the context that significant redevelopment of the wider site has been allowed and is shortly to be built out. As the illustrative masterplan of 21/0302 shows, this development when built out will somewhat alter the setting of the heritage assets.

6.1.4 Appendix D of the LAA Identifies a pipeline of development of sites with planning permission for 7,583 homes of which 2,061 homes are under construction as 31

March 2023. We acknowledge that Site SR25 is within the pipeline of development for Medway's housing need. However, given the scale of the application and in the event that permission is not fully implemented at the site it is considered that the Council should consider it for an emerging allocation in the Local Plan prior to the consent being fully implemented.

- 6.1.5 Given that the site has been granted consent previously by the council it is considered that there are no unacceptable barriers in terms of Heritage, Ecological, Highways, Landscape or Contamination constraints that could not be overcome on the site.

6.2 CONCLUSION

- 6.2.1 Given the above it is acknowledged site SR25 is within Medway's current pipeline for development. However, given that works on the site have only commenced in part it would be preferable for the Council to allocate the site for the delivery of 181 units in the emerging Local Plan until a time that works have commenced on residential development site. This will secure the sites allocation allowing the principle of development to be acceptable in case the permission lapses. It must be noted that this is a worst-case scenario and it is not envisaged at this time that the current permission will lapse.

7 PREFERRED SPATIAL STRATEGY

7.1 PREFERRED SPATIAL STRATEGY

- 7.1.1 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 "Suburban Expansion". In identifying our preferred option, we have also considered the pros and cons of the other development options.

Option 1 - Urban Regeneration

- 7.1.2 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.
- 7.1.3 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.
- 7.1.4 In addition, in line with historic trends, these sites are less likely to yield compliant levels of affordable housing because of issues of viability. There is a significant and dire need for affordable housing in Medway and a mix of sites must be allocated to help address this need, including greenfield sites which are less likely to have issues of viability.

Option 2 - Suburban Expansion – The Preferred Spatial Strategy

- 7.1.5 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.
- 7.1.6 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.

- 7.1.7 For the reasons set out in Section 5, “Land West of Berwick Way and the Manor Farm sites” would positively contribute to the supply of housing, representing a sustainable and deliverable urban regeneration sites.

Option 3 - Rural Development

- 7.1.8 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 suitable to allocate 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 especially early on in the Plan period.

Option 4 - Green Belt Release

- 7.1.9 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.
- 7.1.10 The need for green belt release only forms a very small part of the potential supply and should not be relied upon as it falls significantly short of meeting the identified need. However, in line with separate representations submitted by Bellway in respect of land in Strood, some limited green belt release could form a logical and sustainable extension to the existing urban area, where the land does not perform well against the purpose and function of the green belt. However, this must only be considered alongside other options for growth.

7.2 SUMMARY

- 7.2.1 To meet the identified housing requirement in full, housing will need to be allocated drawing on several of the spatial strategies. However, the preferred spatial strategy is urban regeneration including the allocation of “Land West of Berwick Way SR27 and the Manor Farm Site SR25”.

8 OTHER COMMENTS ON THE LAND AVAILABILITY ASSESSMENT

- 8.1.1 There are no overarching comments on the LAA at this time because it is only at Stage 1.

9 CONCLUSIONS

9.1 OVERALL SUMMARY

- 9.1.1 Plan to meet its full objectively assessed need. The Council has persistently under delivered against its housing requirement, resulting in a significant housing need, both market and affordable;
- 9.1.2 We advocated extend the Plan period until at least 2042, to ensure it covers the required 15yrs at the point of adoption (NPPF, para 22);
- 9.1.3 We advocate amending 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 of 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);
- 9.1.4 We advocate amending the “Strategic Objectives” to include as an objective on its own the need to deliver housing to meet identified needs. This is necessary to accord with the NPPF (para 20) which requires the inclusion of strategic policies that set out the overall strategy and pattern for spatial growth, including for the provision of housing. The “Strategic Objectives” can therefore not be silent on this matter.
- 9.1.5 Concerns are raised regarding the current identified supply of housing for the Plan period including the housing pipelines. A wide range of sites including urban regeneration sites need to be released for development to meet identified needs such as “Land West of Berwick Way”. Pipeline sites such as “Manor Farm” should also be secured as allocations. Allocating these sites would help secure community benefits, including positively addressing the constraints identified in the consultation document.
- 9.1.6 However, there is no one spatial strategy that can deliver the Council’s full housing need, but the spatial strategy must include “Urban Regeneration” sites.
- 9.1.7 As such it can be considered that both sites Land West of Berwick Way” and “Manor Farm” positively contribute to the supply of sites as a sustainable Urban Regeneration sites in the Medway Towns. The Sites should therefore be allocated for development.

planning
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design
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Transport Feasibility Assessment for The Heritage Design and Development Team

Land West of Berwick Way, Rochester

February 2023

PL/JM/30500



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Appendices

- A Site Layout Plan
 - B Indicative Access Design
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-

1 Introduction

- 1.1.1 DHA has been appointed by The Heritage Design and Development Team to complete a Transport Feasibility Assessment in order to provide information to support of the call for sites application for a proposed development of approximately 31 dwellings on Land West of Berwick Way, in Rochester, Kent.
- 1.1.2 This report has been produced in accordance with the Planning Practice Guidance (PPG, March 2014). Following this introduction, the report is structured as follows:-
- Section 2 summarises the existing transport conditions local to the site;
 - Section 3 sets out the development proposals and a potential access strategy;
 - Section 4 provides an assessment of compliance with transport planning policy;
 - Section 5 looks at the forecast vehicular trip generation of the proposals; and
 - Section 6 provides a summary and conclusion.

2 Existing Transport Conditions

2.1 The Existing Site

- 2.1.1 The site is located approximately 1.5km to the north of Rochester. The site location is shown in Figure 1 below.



Figure 2-1: Site Location Plan (courtesy of Google Maps)

- 2.1.2 The site is currently open green land and is bound by Berwick Way to the north, Upnor Roundabout to the east, industrial units to the south and Parsonage Lane to the west with Manor Farm beyond.
- 2.1.3 It is noted that proposals for development at Manor Farm to the east of the site has been approved (application reference MC/21/0302) for the development of a three-storey secondary school, a wedding venue and 181 residential dwellings, where the residential element is to be served off Parsonage Lane. This development will include a new access onto Frindsbury Hill, improvements to the Sans Pareil Roundabout and a new access onto Parsonage Lane.

2.2 Local Highway Network

- 2.2.1 There are no existing accesses to the site, where the site is adjacent to both A289 Berwick Way and Parsonage Lane. It is noted there is a large level difference between Berwick Way and the site.
- 2.2.2 The A289 Berwick Way is located to the east of the site and provides access between the tunnel to Gillingham and to junction 1 of M2. Berwick Way is a Dual Carriageway and is subject to a 50mph speed limit. It is provided with a segregated footway/cycleway on the western side and a footway of approximately 2.5m on its eastern side.

- 2.2.3 Parsonage Lane is located to the west of the development and is a dead-end cul-de-sac serving approximately 21 dwellings including Manor Farmhouse as well as Ampersand House assisted living home as well as the proposals for the Manor Farm scheme. Parsonage Lane has a length of approximately 750m where the site is located at the end of this length. Parsonage Lane has varying width along its length with a minimum of 4.8m and is subject to a 30mph speed limit. Parsonage Lane is also subject to a 7.5t weight restriction which is likely due to its current lack of an adopted turning head.
- 2.2.4 Parsonage Lane connects onto A228 Frindsbury Road, which eastwards connects to junction 1 of M2 and to the south west provides access to Strood and Rochester Bridge providing good connectivity from the site to the wider highway network.

2.3 Walking and Cycling Infrastructure

- 2.3.1 Parsonage Lane is provided with a footway on one side for the first 700m from its junction with A228 Frindsbury Road. The footway is approximately 1.8m in width in its duration and swaps side of the carriageway after 450m.
- 2.3.2 Along the northwestern boundary of the site, Parsonage Lane is gated off for vehicular access where a shared footway/cycleway is provided to join the segregated footway/cycleway on Berwick Way.
- 2.3.3 Figure 2-3 overleaf identifies (in purple) the Public Rights of Way (PRoW) within the vicinity of the site. Public footway (RS121) runs through the proposed site between Parsonage Lane and Berwick Way providing a route towards Upnor. Public Footpath (RS328) is opposite the site access and provides access from Parsonage Lane to Frindsbury Road. Additionally, to the south Public Footpaths (RR6 and RR9) provide access from Parsonage Lane to Commissioners Lane and Church Green respectively providing access to Strood.

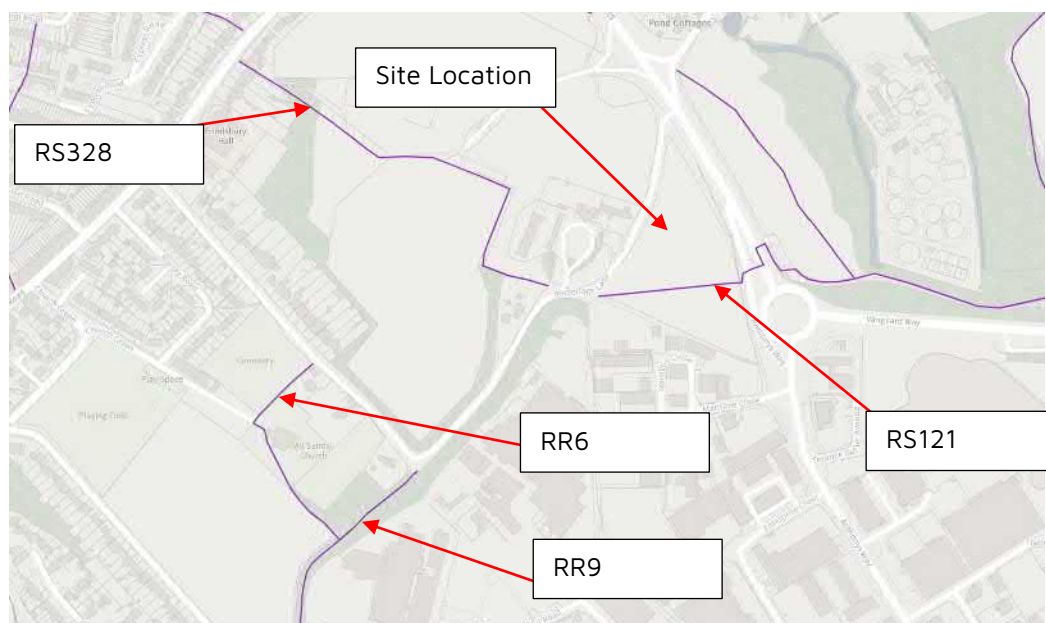


Figure 2-3: Local Public Rights of Way (courtesy of Medway Council)

- 2.3.4 The online Sustrans database has been reviewed in order to establish any cycle routes within the vicinity of the site. National Cycle Route 1 is noted to be located adjacent to the western and northeastern boundary of the site running along Parsonage Lane, and along Berwick Way between Strood and Upnor. The route runs between Dover and Scotland along the eastern coast of the UK providing a good route for Cyclists. An extract of the Sustrans cycle map has been shown in Figure 2-4 below.



Figure 2-4: Cycle Network (Courtesy of Sustrans)

2.4 Public Transport Infrastructure

- 2.4.1 The closest bus stops to the site are located on Friendsbury Road at the Parsonage Lane junction, approximately 750m (or less than a 10-minute walk) to the West. These stops are served by eight routes, which have been summarised in Table 2-1 below.

| Service No. | Route | Weekday Frequency |
|-------------|---|--|
| 191 | Chatham – Rochester – Strood – Hoo – Grain | Half Hourly |
| 193 | Chatham – Rochester – Strood – Hoo – Cliffe | Approximately every two hours on Sundays |
| 652 | St Marys Island – Strood – Cuxton – Medway Valley Park – Strood | School Service |
| 670 | Strood – Rochester Grammar School – Warren Wood primary school | School Service |
| 671 | St Marys Island – Chatham – Hoo | School Service |

| | | |
|-----|--|----------------|
| 689 | Strood – Earl Estate – Frindsbury – Wainscott – The Hundred of Hoo Academy | School Service |
| 692 | Lower Stoke, Allhallows – High Halstow – Hoo – Chattenden – Wainscott – Strood – Rochester Grammar | School Service |
| 693 | Earl Estate – Frindsbury – Wainscott – Strood – Rochester Grammar School | School Service |
| 394 | Higham – Wainscott – Strood – Rochester | School Service |

Table 2-1 – Summary of Local Bus Routes

- 2.4.2 The closest railway station to the site is Strood, which is located approximately 1.0km to the south-west. This provides access to regular train services to destinations throughout South East England via the Southern and Thameslink networks.
- 2.4.3 These public transport services, together with the walking infrastructure described above, will allow future residents of the proposed development with the means to access everyday services and facilities without the use of the private car, in accordance with the National Planning Policy Framework (NPPF) objective of sustainable travel.

2.5 Highway Safety

- 2.5.1 Data has been sourced from the online CrashMap resource which shows that there were only three Personal Injury Collisions (PICs) on Parsonage Lane or at its junction with A228 Frindsbury Road within the latest five-year period for which statistics are available. All three of these incidents were classified as 'slight' in severity, one occurred on Parsonage Lane outside of the site between two vehicles, and two occurred at the junction with Frindsbury Road one involving three vehicles including a young driver and the other involving a vehicle and a child. An extract is shown in Figure 2-5 overleaf.

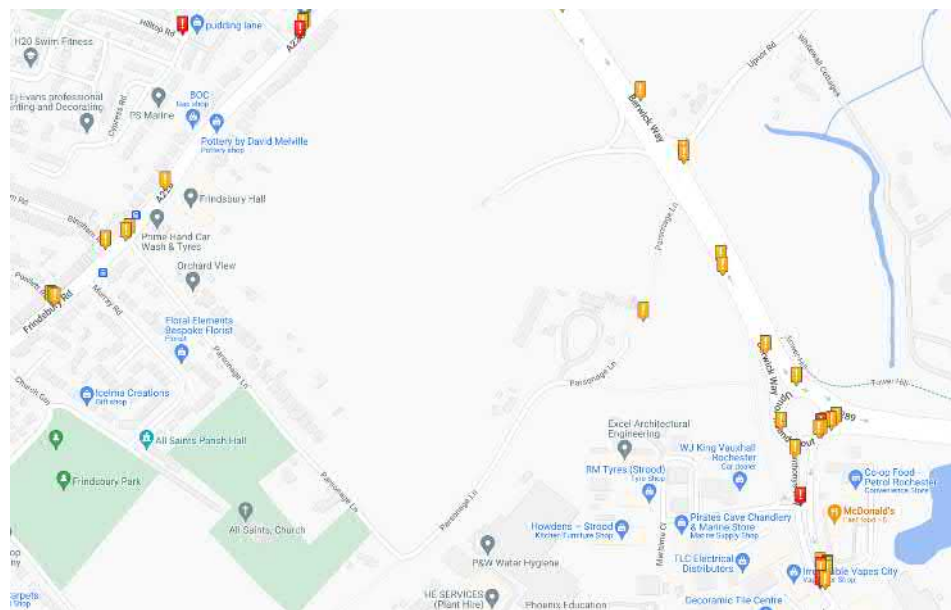


Figure 2-5: PIC Data (Courtesy of CrashMap.co.uk)

- 2.5.2 Beyond Parsonage Lane, a multitude of other incidents have occurred on Frindsbury Road and Berwick Way. Details of these incidents and the ones mentioned above will be obtained as part of any forthcoming planning application and will be assessed in more detail.
- 2.5.3 Given the low amount of incidents on Parsonage Lane, it is considered that there is a good highway safety record accessing the site, and the proposals are unlikely to affect the existing record further.

3 Development Proposals

3.1 Overview

- 3.1.1 The proposed development comprises the construction of approximately 31 residential dwellings, with access from the Parsonage Lane. An indicative site layout plan is included at **Appendix A**.

3.2 Vehicular Access

- 3.2.1 A feasibility site access design is included at **Appendix B**. The associated visibility splays are demonstrated on Drawing Reference: 30500-H-01.
- 3.2.2 Parsonage Lane is subject to a 30mph speed limit, requiring visibility splays of 2.4 x 43m based on Manual for Streets. This has been demonstrated as achievable to the south within publicly maintainable land (confirmed by Medways online database) however to the north of the proposed access, as mentioned, Parsonage Lane is a dead end for vehicular traffic. Visibility splays of 2.4 x 25m have been demonstrated to the north demonstrating that vehicles exiting the site could see an approaching cyclist or a slow-moving vehicle at up to 20mph approaching from the north.
- 3.2.3 The proposed access has been formed as a standard priority junction with a carriageway width of 5.5m narrowing to 4.8m within the site.
- 3.2.4 The access proposals have been subject to a vehicle swept path analysis exercise, which is shown on Drawing Reference: 30040-T-01, also contained at **Appendix B**. This shows that the access can safely and efficiently accommodate an 11.4m refuse vehicle.
- 3.2.5 The access design will be subject to an independent Stage 1 Road Safety Audit as part of any forthcoming planning application, with any related modifications made as necessary.

3.3 Pedestrian Access

- 3.3.1 In order to provide pedestrian access to the proposed development, a 2m footway has been shown along the northern side of the access where pedestrians can then continue on the footway/cycleway to Berwick Way. Additionally, a 0.5m construction margin in the form of a grass verge is provided on the southern side.
- 3.3.2 To the south of the proposed access, the existing Public Right of Way is being maintained through the site, where an additional stretch of footway has been shown on the southern side of Parsonage Lane linking with the existing footway, currently terminating 50m from the site. This footway is provided within the extent of the carriageway, where the road has been narrowed to a minimum of 5m.

3.4 Parking

- 3.4.1 On-site vehicle and cycle parking will be provided with reference to the applicable local standards at the time of submission of any planning application.

4 Transport Planning Policy

4.1 National Planning Policy Framework (NPPF)

4.1.1 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other developments can be produced. The NPPF is a material consideration in planning decisions.

4.1.2 At the heart of the NPPF is a presumption in favour of sustainable development. This is reflected in Section 9 of the document where it is noted that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes. The NPPF advises that in assessing sites, it should be ensured that:-

- (a) "Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- (b) Safe and suitable access to the site can be achieved for all users; and*
- (c) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*

4.1.3 Paragraph 111 states that: *"development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

4.1.4 Paragraph 112 then goes on to note that applications for development should:-

- (a) "Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- (b) Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- (c) Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- (d) Allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- (e) Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."*

- 4.1.5 All developments that will generate significant amounts of movement should be required to provide a Travel Plan, and the application should be supported by a Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed.

4.2 Planning Practice Guidance (PPG)

- 4.2.1 The PPG was established in March 2014 as a supporting resource in conjunction with the NPPF, which is also a material consideration in determining planning applications. With respect to transport, the PPG includes a section titled 'Travel Plans, Transport Assessments and Statements in Decision-Taking'. This provides general guidance on the process of producing these documents, from which the following key points are expressed.
- 4.2.2 With regard to the purpose of a Transport Assessment or Statement, it is noted that:-

"The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid unacceptable or "severe" impacts. Travel Plans can play an effective role in taking forward those mitigation measures which relate to on-going occupation and operation of the development."

4.3 Medway Local Transport Plan 3 (LTP3) 2011-2026

- 4.3.1 The Medway Local Transport Plan 3 (LTP3) runs from 2011-2026, with the aim of addressing "*wider social, economic and environmental challenges for the area*" by focussing on the delivery of five overarching priorities:-
- (1) "Supporting Medway's regeneration, economic competitiveness and growth by securing a reliable and efficient local transport network"*
 - (2) Supporting a healthier natural environment by contributing to tackling climate change and improving air quality*
 - (3) Ensuring Medway has good quality transport connections to key markets and major conurbations in Kent and London*
 - (4) Supporting equality of opportunity to employment, education, goods and services for all residents in Medway*
 - (5) Supporting a safer, healthier and more secure community in Medway by promoting active lifestyles and by reducing the risk of death, injury or ill health or being the victim of crime".*
- 4.3.2 To ensure the delivery of these priorities, the LTP will support Medway Council's ambitious plans by:-
- *"ensuring highway infrastructure is maintained to the highest possible standard within the available resources"*

- *efficiently managing and improving Medway's local highway network to ensure reliability of journey times*
- *ensuring public transport becomes a realistic alternative choice to the private car*
- *contributing to better health by encouraging walking and cycling and by improving accessibility to key services*
- *ensuring that people can move around safely in Medway".*

4.4 Medway Local Plan (2003)

- 4.4.1 The Medway Local Plan (2003), which remains extant pending the adoption of the new Local Plan to 2037, outlines a number of transport-related policies for Medway. Of note, Policy T1 states that:-

"In assessing the highways impact of development, proposals will be permitted provided that:

- (i) the highway network has adequate capacity to cater for the traffic which will be generated by the development, taking into account alternative modes to the private car;*
- (ii) the development will not significantly add to the risk of road traffic accidents;*
- (iii) the development will not generate significant H.G.V. movements on residential roads; and*
- (iv) the development will not result in traffic movements at unsociable hours in residential roads that would be likely to cause loss of residential amenity".*

- 4.4.2 With respect to highway access, Policy T2 states that:-

"Proposals which involve the formation of a new access, or an intensification in the use of an existing access, will only be permitted where:

- (i) The access is not detrimental to the safety of vehicle occupants, cyclists and pedestrians;*
- (ii) Can, alternatively, be improved to a standard acceptable to the council as Highway Authority".*

- 4.4.3 For pedestrians, Policy T3 outlines the following:-

"Medway Council will develop a network of safe and convenient footpaths, to link houses, schools, town centres, work places, recreation areas and public transport routes.

Development proposals shall provide attractive and safe pedestrian access. In all cases, they should maintain or improve pedestrian routes related to the site.

New pedestrian routes should closely follow pedestrians' preferred routes, should be designed to provide an attractive and safe pedestrian environment, and ensure they are accessible by people with disabilities wherever possible."

4.4.4 With respect to cycling facilities, Policy T4 notes that:-

"The council is implementing a network of strategic cycle routes, and the development of this and local routes will be actioned through the Highways Programme and the development process.

Major trip attracting development proposals should make provision for cycle facilities related to the site. This may include, where appropriate, the Strategic Cycle Network, cycle priority measures and new or enhanced cycle routes that relate to cyclists' preferred routes.

Secure cycle parking and associated facilities will be sought in accordance with the council's adopted cycle parking standards. Provision at public transport interchanges, buildings open to the general public (especially public institutions, leisure, educational and health facilities) and in Chatham town centre, District Centres and Local Centres will be particularly sought."

4.4.5 With regard to parking standards, Policy T13 states the following:-

"Development proposals will be expected to make vehicle parking provision in accordance with the adopted standard. The current standard is shown in Appendix 6.

Provision for people with disabilities will be required to be made on site, consistent with the provisions of policy T22."

4.4.6 Policy T22 states that:-

"Development including facilities to be used by the public, and new housing development, will need to demonstrate that the needs of people with disabilities have been fully taken into account.

All new development designed to be open to the public shall provide adequately signed and appropriate access for people with disabilities subject to the requirements of the legislation and conditions affecting Listed Buildings and Scheduled Ancient Monuments.

Except in the Transport Policy Areas, as defined on the proposals map, (where such provision will be made communally by the council) the car parking provision generated by the needs of the development under policy T13 shall not be commuted in respect of the provision for people with disabilities. The provision shall be:

- (i) Made on the site, with the parking spaces closer than any other spaces to the main pedestrian access to the development;*
- (ii) Of the size and layout defined in the council's vehicle parking standards;*
- (iii) Clearly marked for the use only of people with disabilities."*

4.5 Draft Medway Local Plan 2019-2037

- 4.5.1 Medway Council is currently preparing its new Local Plan, which will be a single, all-encompassing document, with reference to strategic level and development management policies, land allocations and minerals and waste.
- 4.5.2 In January 2017, the Council published its Development Options report, which detailed a number of policy approaches relating to transport matters.
- 4.5.3 **Policy Approach: Transport** states that:-

"The council will work with the relevant authorities and transport providers to:

- support the Medway Local Transport Plan (2011-26) and subsequent iterations during the plan period, along with the associated three-year Implementation Plans and strategies;*
- ensure development is located and designed to enable sustainable transport;*
- mitigate the impacts of new development according to Transport Assessments and Transport Statements, or refuse development where its residual cumulative impacts are severe;*
- require a Travel Plan for development which will generate significant amounts of movement;*
- plan for strategic road network and rail improvements;*
- improve public transport provision and the walking and cycling network;*
- improve 'park and ride' services;*
- engage with the relevant authorities to address the impacts of the proposed Lower Thames Crossing;*

- *undertake any necessary revisions to the adopted Parking Standards; and*
- *improve air quality as a result of vehicular emissions."*

4.5.4 Policy Approach: Vehicle Parking states that:-

"Planning applications for residential and non-residential development will be determined in accordance with the adopted Parking Standards.

For predominantly residential development, Design and Access Statements must demonstrate how vehicle parking adheres to the following design principles:

- *formal parking bays as part of the carriageway, indicated by clear road markings or surfacing;*
- *access to vehicles should be from the front of the property;*
- *avoid parking within the front curtilage of the property where appropriate;*
- *well surveyed;*
- *planting to soften the impact of vehicles;*
- *establish 'home zones' where appropriate;*
- *accommodate parking for larger, commercial vehicles;*
- *accommodate parking for Blue Badge holders in suitable locations;*
- *accommodate dedicated spaces for car club membership where appropriate; and*
- *accommodate electric and other ultra-low emission vehicle parking.*

In line with national policy and guidance, the council will seek opportunities to improve the quality and, where appropriate, the quantity of parking in town centres. In addition, the strategic management of public car parking, as set out in the LTP, will support the vitality of town centres."

4.5.5 Policy Approach: Cycle Parking notes that:-

"Planning applications will be determined in accordance with the adopted Parking Standards.

In addition, cycle parking required as part of development proposals will be expected to pay attention to the following key principles:

- *have sufficient capacity for existing use and for an increase in demand;*
- *located in a prominent, accessible and convenient position;*
- *parking stands should allow the bicycle frame and at least one wheel to be locked to cater different sizes and shapes of bikes;*
- *well surveyed;*
- *secure as appropriate to the surroundings and length of stay;*
- *longer stay parking should be covered, well-lit and have CCTV where practical/feasible;*
- *low-level parking should be provided in the first instance;*
- *free of charge;*
- *clean and well maintained”.*

4.5.6 Policy Approach: Connectivity states that:-

“Masterplans and/or Design and Access Statements must demonstrate how the proposed street layout will promote ease of movement along safe routes and integrate with adjacent built-up areas. The external connectivity and internal permeability of new development proposals will require careful consideration. Development will be expected to be integrated with the public realm and public transport, in particular ensuring that local facilities and services are easily accessible by foot or bicycle.

The council will seek to expand the network of safe pedestrian and cycle routes to ensure that areas dedicated to vehicular circulation are designed with pedestrian safety and needs of vulnerable groups in mind.

The council will seek to ensure that new developments incorporate measures designed to minimise traffic flows and speeds that result in child-friendly streets in residential areas”.

4.6 Parking Policy

- 4.6.1 Parking policy guidance for residential developments in Medway is set out in the Medway Council Interim Parking Standards (2010). These standards set out minimum parking requirements, as shown in the extract in Figure 4-1 overleaf:-

| C3 Residential dwellings * | | |
|-----------------------------------|--|--|
| Dwelling size | Minimum number of car parking spaces per dwelling | Minimum number of cycle parking spaces per dwelling |
| 1 bedroom | 1.0 ^{(1) (2)} | 1.0 ⁽⁴⁾ |
| 2 bedrooms | 1.5 ^{(1) (2)} | 1.0 ⁽⁴⁾ |
| 3 bedrooms & above | 2.0 ^{(1) (2)} | 1.0 ⁽⁴⁾ |
| Visitor parking | 0.25 ⁽³⁾ | 0 |

Figure 4-1: Medway Council Interim Residential Parking Standards

4.6.2 The following notes accompany the above table:-

1. *"Reductions of the standard will be considered if the development is within an urban area that has good links to sustainable transport and where day to day facilities are within easy walking distance"*
2. *Excludes garage if less than 7m x 3m internal dimension*
3. *Applies to a minimum threshold of 4 residential units. Requirement for provision is rounded down, i.e. 5 to 7 units require 1 visitor space, 8 to 11 units require 2 spaces, etc. Visitor or unallocated vehicle parking can, subject to appropriate design, be located on or near the road frontage.*
4. *Not required if garage or secure area is provided within curtilage of dwelling."*

4.7 Policy Compliance

- 4.7.1 The proposed development is considered to comply with all relevant national and local transport planning policies. The site enjoys good access to the local highway network and is located within a reasonable walking distance of public transport nodes, providing residents with realistic opportunities for non-car travel. A railway station is also located within reasonable proximity to the site, providing access to a range of regional destinations.

- 4.7.2 It is considered that safe and suitable access to the site can be achieved in accordance with the applicable highway design guidance.
- 4.7.3 On-site parking will be provided with reference to the relevant local standards and the vehicular trip generation of the site will not have material adverse impacts on the operation or safety of the local highway network.
- 4.7.4 Given the above, it is evident that the proposed development will not result in unacceptable highway safety impacts or 'severe' residual capacity impacts, in accordance with Paragraph 111 of the NPPF.

5 Trip Generation

5.1 Overview

- 5.1.1 This section outlines the methodology employed to calculate the likely vehicle trip generation of the proposed development. This assessment is based on the approximate site yield of 31 dwellings, of which 10% will be affordable in line with the NPPF. The robust assumption has been made that all the dwellings will take the form of houses.

5.2 Proposed Development Vehicle Trip Generation

Private Housing

- 5.2.1 The vehicle trip generation of the proposed development has been ascertained with reference to the national TRICS trip rate database. To provide the most representative assessment of the private housing element of the proposal, the TRICS selection '03-RESIDENTIAL, A-HOUSES PRIVATELY OWNED' has been made for survey sites outside of London, in England. Edge of Town Centre and Suburban locations were considered to provide a representative dataset. A summary of the resulting average TRICS trip rates is provided in Table 5-1 below. The full TRICS data reports are included at **Appendix C**.

| Period | Arrivals | Departures | Total |
|-----------|----------|------------|-------|
| 0800-0900 | 0.141 | 0.432 | 0.573 |
| 1700-1800 | 0.392 | 0.208 | 0.600 |
| 0700-1900 | 2.530 | 2.663 | 5.193 |

Table 5-1: TRICS Trip Rates – Houses Privately Owned (trips/dwelling)

- 5.2.2 These trip rates have been factored by the total number of private dwellings proposed (28 units). A summary of the overall vehicle trip generation for this tenure is outlined in Table 5-2 below. Please note that any inaccuracies are the result of rounding in MS Excel.

| Period | Arrivals | Departures | Total |
|-----------|----------|------------|-------|
| 0800-0900 | 4 | 12 | 16 |
| 1700-1800 | 11 | 6 | 17 |
| 0700-1900 | 71 | 75 | 145 |

Table 5-2: Trip Generation – Houses Privately Owned (28 dwellings)

Affordable Housing

- 5.2.3 To assess the vehicular trip generation of the affordable housing element of the scheme, the TRICS selection '03-RESIDENTIAL, B-AFFORDABLE/LOCAL AUTHORITY HOUSES' has been made, with the same sub-categories as above also selected. The resulting average trip rates are summarised below in Table 5-3.

| Period | Arrivals | Departures | Total |
|-----------|----------|------------|-------|
| 0800-0900 | 0.137 | 0.194 | 0.331 |
| 1700-1800 | 0.299 | 0.232 | 0.531 |
| 0700-1900 | 1.960 | 1.956 | 3.916 |

Table 5-3: TRICS Trip Rates – Houses Affordable (trips/dwelling)

- 5.2.4 The above trip rates have subsequently been factored by the total number of affordable dwellings proposed (3 units) to provide the summary of the vehicle trip generation for this element of the scheme shown below in Table 5-4. Please note that any inaccuracies are the result of rounding in MS Excel.

| Period | Arrivals | Departures | Total |
|-----------|----------|------------|-------|
| 0800-0900 | 0 | 1 | 1 |
| 1700-1800 | 1 | 1 | 2 |
| 0700-1900 | 6 | 6 | 12 |

Table 5-4: Trip Generation – Houses Affordable (3 dwellings)

Total Trip Generation

- 5.2.5 The above trip rates have subsequently been combined to produce the total vehicular trip generation of the circa 31 dwellings, which is shown below in Table 5-5. Please note that any inaccuracies are the result of rounding in MS Excel.

| Period | Arrivals | Departures | Total |
|-----------|----------|------------|-------|
| 0800-0900 | 4 | 13 | 17 |
| 1700-1800 | 12 | 7 | 19 |
| 0700-1900 | 77 | 81 | 157 |

Table 5-5: Total Trip Generation – Proposed Development (31 Units)

- 5.2.6 It is forecast that the proposed residential development has the capacity to generate approximately 157 vehicle trips across the 12-hour weekday period, of which 17 would occur in the AM peak hour and 19 in the PM peak hour. This equates to just over 13 vehicle movements per hour on average during the 12-hour period (or just over one every 5 minutes), which is not considered to represent a significant or 'severe' residual transport impact with reference to NPPF Paragraph 111.

6 Summary and Conclusion

- 6.1.1 This Transport Feasibility Assessment has been prepared on behalf of The Heritage Design and Development Team Ltd in support of the promotion of Land West of Berwick Way, Rochester, for a residential development of approximately 31 dwellings, with access from Parsonage Place.
- 6.1.2 Following a review of national and local transport planning policy, no conflicts are envisaged. The site is within a reasonable walking distance of local bus stops, providing access to regular services to a range of local and regional destinations. Future residents will therefore have the opportunity to undertake everyday journeys by non-car means, in accordance with the principles of sustainable development set out in local and national planning policy.
- 6.1.3 It has been demonstrated that safe and suitable access to the site can be achieved in accordance with the applicable highway design guidance.
- 6.1.4 It is noted that the proposed development has the capacity to generate approximately 157 vehicle trips across the 12-hour weekday period (07:00-19:00). This equates to just over 13 vehicle trips per hour on average, with the AM peak hour experiencing 17 trips and the PM peak experiencing 19 movements. It is not considered that this represents a 'severe' residual impact with reference to Paragraph 111 of the National Planning Policy Framework.
- 6.1.5 Given the above, it is concluded that the proposed development should not have any adverse transport impacts and that there should be no transport-based objections to a future Local Plan allocation and planning application.

APPENDIX A



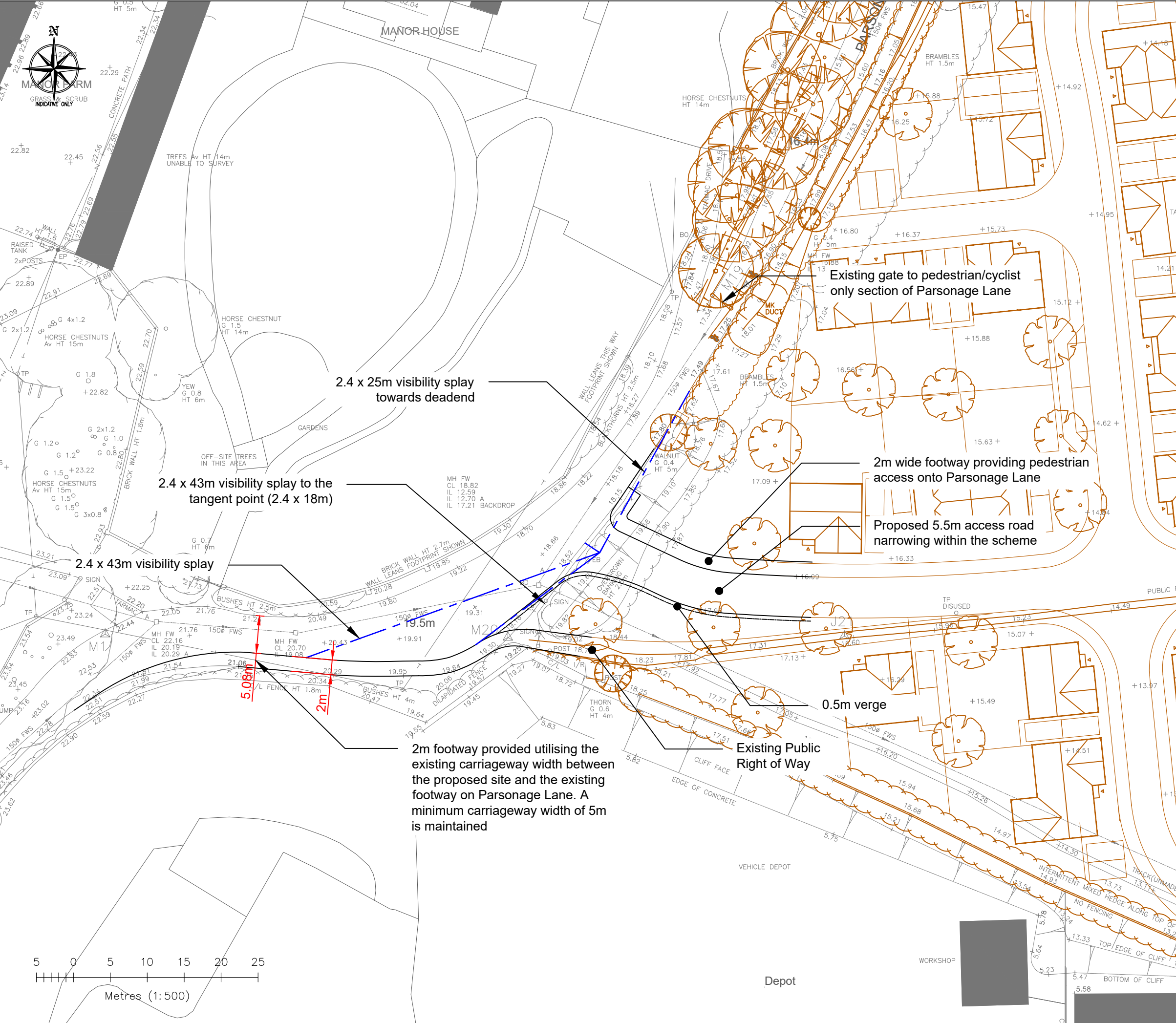
Site Layout Plan



APPENDIX B




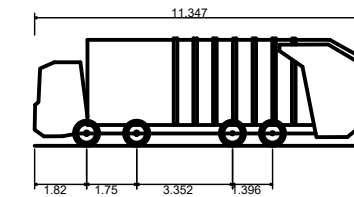
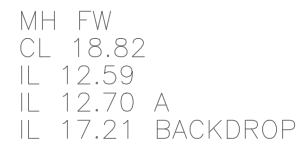
Access Drawings



DO NOT SCALE

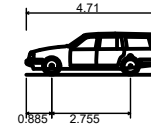
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| P1 | 22.02.23 | JM | First Issue | CS | CS |
| REV | DATE | BY | DESCRIPTION | CHK | APD |
| client | | | | | |
| THE DESING HERITAGE AND DEVELOPMENT TEAM LTD | | | | | |
| project | | | | | |
| LAND WEST OF BERWICK WAY, GILLINGHAM | | | | | |
| title | | | | | |
| INDICATIVE ACCESS ARRANGEMENT | | | | | |
| project | | drwg | | rev | |
| 30500 | | H-01 | | P1 | |
| Drawn | Checked | Approved | scale @ A3 | date | |
| JM | CS | CS | 1:500 | 22.02.23 | |
| status | | | | | P |
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| e: info@dhaplanning.co.uk | | | w: www.dhaplanning.co.uk | | |
| CAD Reference: | | | | | A3 |



11.4m Refuse
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Track Width
Lock to lock time
Kerb to Kerb Turning Radius

11.347m
2.500m
3.751m
0.304m
2.500m
6.00s
11.330m

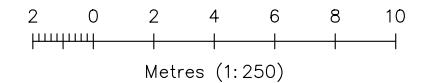


Estate Car (2006)
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Max Track Width
Lock to lock time
Kerb to Kerb Turning Radius

4.710m
1.804m
1.442m
0.207m
1.756m
4.00s
5.950m

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| REV | DATE | BY | DESCRIPTION | CHK | APD |

THE HERITAGE DESIGN AND DEVELOPMENT
TEAM LTD

LAND WEST OF BERWICK WAY, GILLINGHAM

title

VEHICLE SWEEP PATH ANALYSIS
INDICATIVE ACCESS ARRANGEMENT

| | | | | |
|------------------|---------------|----------------|---------------------|------------------|
| project 30500 | | drwg T-01 | | rev P1 |
| Drawn JM | Checked CS | Approved CS | scale @ A3 1:250 | date 22.02.23 |

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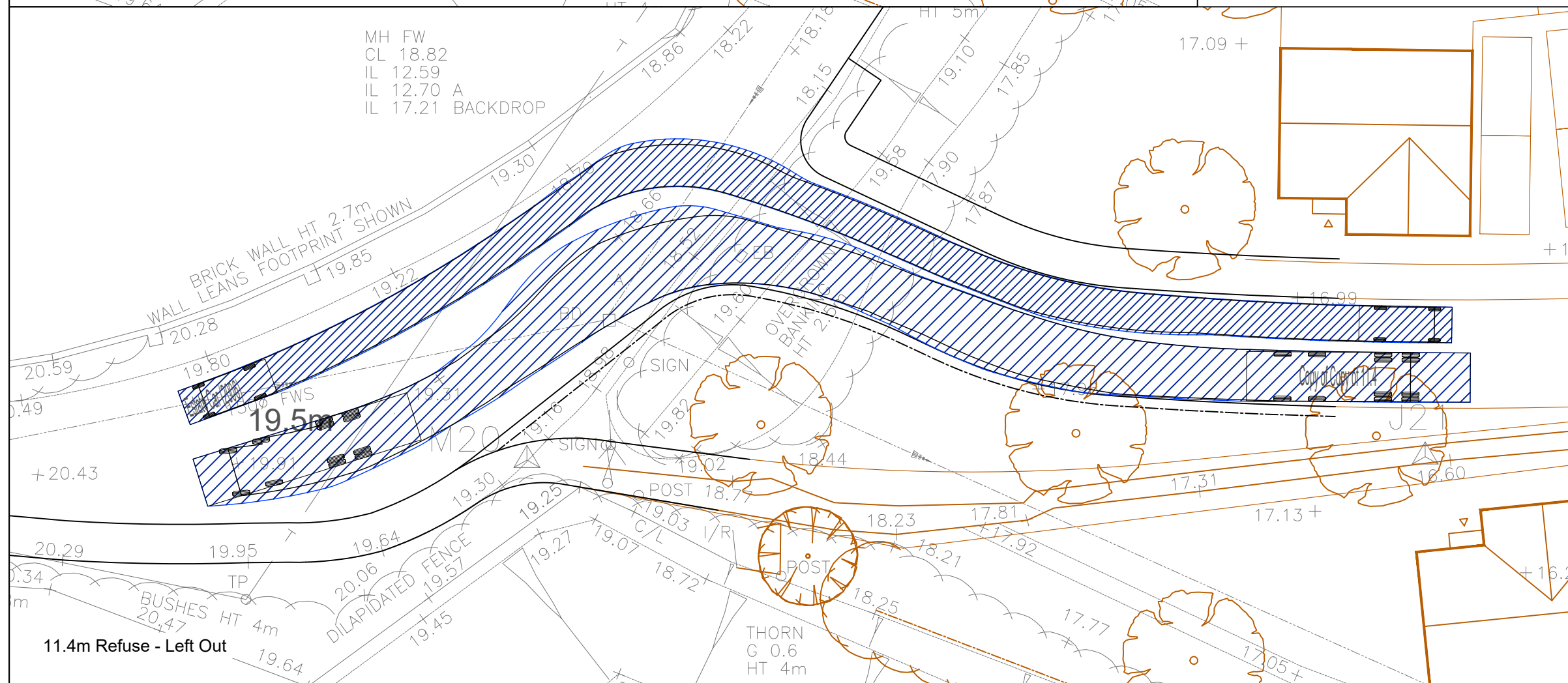


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CAD Reference:

A3



APPENDIX

C



TRICS Data

Filtering Summary

| | | |
|--|----------------------|----------------------------|
| Land Use | 02/C | EMPLOYMENT/INDUSTRIAL UNIT |
| Selected Trip Rate Calculation Parameter Range | 150-10000 sqm GFA | |
| Actual Trip Rate Calculation Parameter Range | 260-9216 sqm GFA | |
| Date Range | Minimum: 01/01/14 | Maximum: 22/11/21 |
| Parking Spaces Range | All Surveys Included | |
| Days of the week selected | Monday | 2 |
| | Tuesday | 1 |
| | Wednesday | 2 |
| | Thursday | 3 |
| | Friday | 1 |
| Main Location Types selected | Edge of Town | 9 |
| Population within 500m | All Surveys Included | |
| Population <1 Mile ranges selected | 1,001 to 5,000 | 1 |
| | 5,001 to 10,000 | 4 |
| | 10,001 to 15,000 | 1 |
| | 20,001 to 25,000 | 2 |
| | 25,001 to 50,000 | 1 |
| Population <5 Mile ranges selected | 5,001 to 25,000 | 1 |
| | 50,001 to 75,000 | 1 |
| | 75,001 to 100,000 | 3 |
| | 100,001 to 125,000 | 1 |
| | 125,001 to 250,000 | 3 |
| Car Ownership <5 Mile ranges selected | 0.6 to 1.0 | 2 |
| | 1.1 to 1.5 | 7 |
| PTAL Rating | No PTAL Present | 9 |
| Filter by Site Operations Breakdown | All Surveys Included | |

Calculation Reference: AUDIT-704001-220713-0700

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
Category : C - INDUSTRIAL UNIT
TOTAL VEHICLES

Selected regions and areas:

| | | |
|----|-----------------|--------|
| 02 | SOUTH EAST | |
| | HC HAMPSHIRE | 1 days |
| 04 | EAST ANGLIA | |
| | NF NORFOLK | 1 days |
| 06 | WEST MIDLANDS | |
| | WK WARWICKSHIRE | 1 days |
| 08 | NORTH WEST | |
| | CH CHESHIRE | 2 days |
| | LC LANCASHIRE | 1 days |
| 09 | NORTH | |
| | CB CUMBRIA | 2 days |
| 11 | SCOTLAND | |
| | SR STIRLING | 1 days |

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Gross floor area
Actual Range: 260 to 9216 (units: sqm)
Range Selected by User: 150 to 10000 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/14 to 22/11/21

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

| | |
|-----------|--------|
| Monday | 2 days |
| Tuesday | 1 days |
| Wednesday | 2 days |
| Thursday | 3 days |
| Friday | 1 days |

This data displays the number of selected surveys by day of the week.

Selected survey types:

| | |
|-----------------------|--------|
| Manual count | 9 days |
| Directional ATC Count | 0 days |

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

| | |
|--------------|---|
| Edge of Town | 9 |
|--------------|---|

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

| | |
|------------------|---|
| Industrial Zone | 8 |
| Development Zone | 1 |

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

Not Known 9 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Filter by Site Operations Breakdown:

All Surveys Included

Population within 500m Range:

All Surveys Included

Population within 1 mile:

| | |
|------------------|--------|
| 1,001 to 5,000 | 1 days |
| 5,001 to 10,000 | 4 days |
| 10,001 to 15,000 | 1 days |
| 20,001 to 25,000 | 2 days |
| 25,001 to 50,000 | 1 days |

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

| | |
|--------------------|--------|
| 5,001 to 25,000 | 1 days |
| 50,001 to 75,000 | 1 days |
| 75,001 to 100,000 | 3 days |
| 100,001 to 125,000 | 1 days |
| 125,001 to 250,000 | 3 days |

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

| | |
|------------|--------|
| 0.6 to 1.0 | 2 days |
| 1.1 to 1.5 | 7 days |

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No 9 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present 9 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

| | | | |
|---------------------|-------------------------|-------------------|-----------|
| Site(1): | CB-02-C-01 | Site area: | 0.79 hect |
| Development Name: | DOMINO'S PIZZA | Gross floor area: | 2950 sqm |
| Location: | PENRITH | Parking spaces: | 48 |
| Postcode: | CA11 9BN | No of Employees: | 70 |
| Main Location Type: | Edge of Town | Survey Date: | 10/06/14 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Tuesday |
| PTAL: | n/a | | |
| Site(2): | CB-02-C-02 | Site area: | 0.17 hect |
| Development Name: | STEEL FABRICATION | Gross floor area: | 715 sqm |
| Location: | CARLISLE | Parking spaces: | 9 |
| Postcode: | CA3 0PJ | No of Employees: | 9 |
| Main Location Type: | Edge of Town | Survey Date: | 15/10/21 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Friday |
| PTAL: | n/a | | |
| Site(3): | CH-02-C-02 | Site area: | 1.63 hect |
| Development Name: | INDUSTRIAL MATERIALS | Gross floor area: | 8100 sqm |
| Location: | CHESTER | Parking spaces: | 61 |
| Postcode: | CH1 4EX | No of Employees: | 100 |
| Main Location Type: | Edge of Town | Survey Date: | 19/11/14 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Wednesday |
| PTAL: | n/a | | |
| Site(4): | CH-02-C-03 | Site area: | 0.91 hect |
| Development Name: | OFFICE FURNITURE | Gross floor area: | 6658 sqm |
| Location: | MACCLESFIELD | Parking spaces: | 97 |
| Postcode: | SK11 0TA | No of Employees: | 122 |
| Main Location Type: | Edge of Town | Survey Date: | 19/09/16 |
| Sub-Location Type: | Development Zone | Survey Day: | Monday |
| PTAL: | n/a | | |
| Site(5): | HC-02-C-01 | Site area: | 1.12 hect |
| Development Name: | ENGINEERING COMPANY | Gross floor area: | 3000 sqm |
| Location: | BASINGSTOKE | Parking spaces: | 124 |
| Postcode: | RG22 4LT | No of Employees: | 110 |
| Main Location Type: | Edge of Town | Survey Date: | 16/06/16 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Thursday |
| PTAL: | n/a | | |
| Site(6): | LC-02-C-04 | Site area: | 0.18 hect |
| Development Name: | POWDER COATINGS | Gross floor area: | 1010 sqm |
| Location: | BLACKPOOL | Parking spaces: | 10 |
| Postcode: | FY3 7XQ | No of Employees: | 5 |
| Main Location Type: | Edge of Town | Survey Date: | 20/06/19 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Thursday |
| PTAL: | n/a | | |
| Site(7): | NF-02-C-03 | Site area: | 0.05 hect |
| Development Name: | SHEET METAL CONTRACTOR | Gross floor area: | 260 sqm |
| Location: | NORWICH | Parking spaces: | 10 |
| Postcode: | NR3 2BB | No of Employees: | 8 |
| Main Location Type: | Edge of Town | Survey Date: | 07/11/19 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Thursday |
| PTAL: | n/a | | |
| Site(8): | SR-02-C-01 | Site area: | 0.38 hect |
| Development Name: | SPECIALIST MODEL MAKING | Gross floor area: | 2350 sqm |
| Location: | STIRLING | Parking spaces: | 33 |
| Postcode: | FK7 7UW | No of Employees: | 36 |
| Main Location Type: | Edge of Town | Survey Date: | 16/06/14 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Monday |
| PTAL: | n/a | | |
| Site(9): | WK-02-C-01 | Site area: | 2.03 hect |
| Development Name: | MACHINE ENGINEERING | Gross floor area: | 9216 sqm |
| Location: | RUGBY | Parking spaces: | 102 |
| Postcode: | CV23 0WB | No of Employees: | 133 |
| Main Location Type: | Edge of Town | Survey Date: | 10/11/21 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Wednesday |
| PTAL: | n/a | | |

MANUALLY DESELECTED SURVEYS

| Site Ref | Survey Date | Reason for Deselection |
|------------|-------------|------------------------|
| BD-02-C-01 | 15/10/20 | N/A |
| CH-02-C-04 | 07/05/21 | N/A |
| GS-02-C-02 | 23/04/21 | N/A |
| LC-02-C-05 | 30/06/21 | N/A |
| VG-02-C-01 | 06/05/21 | N/A |

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT
TOTAL VEHICLES
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

| Time Range | ARRIVALS | | | DEPARTURES | | | TOTALS | | |
|---------------|----------|----------|-----------|------------|----------|-----------|----------|----------|-----------|
| | No. Days | Ave. GFA | Trip Rate | No. Days | Ave. GFA | Trip Rate | No. Days | Ave. GFA | Trip Rate |
| 00:00 - 00:30 | | | | | | | | | |
| 00:30 - 01:00 | | | | | | | | | |
| 01:00 - 01:30 | | | | | | | | | |
| 01:30 - 02:00 | | | | | | | | | |
| 02:00 - 02:30 | | | | | | | | | |
| 02:30 - 03:00 | | | | | | | | | |
| 03:00 - 03:30 | | | | | | | | | |
| 03:30 - 04:00 | | | | | | | | | |
| 04:00 - 04:30 | | | | | | | | | |
| 04:30 - 05:00 | | | | | | | | | |
| 05:00 - 05:30 | 2 | 5596 | 0.009 | 2 | 5596 | 0.000 | 2 | 5596 | 0.009 |
| 05:30 - 06:00 | 2 | 5596 | 0.098 | 2 | 5596 | 0.000 | 2 | 5596 | 0.098 |
| 06:00 - 06:30 | 2 | 5596 | 0.009 | 2 | 5596 | 0.000 | 2 | 5596 | 0.009 |
| 06:30 - 07:00 | 3 | 4514 | 0.081 | 3 | 4514 | 0.015 | 3 | 4514 | 0.096 |
| 07:00 - 07:30 | 9 | 3698 | 0.261 | 9 | 3698 | 0.024 | 9 | 3698 | 0.285 |
| 07:30 - 08:00 | 9 | 3698 | 0.168 | 9 | 3698 | 0.036 | 9 | 3698 | 0.204 |
| 08:00 - 08:30 | 9 | 3698 | 0.228 | 9 | 3698 | 0.027 | 9 | 3698 | 0.255 |
| 08:30 - 09:00 | 9 | 3698 | 0.162 | 9 | 3698 | 0.030 | 9 | 3698 | 0.192 |
| 09:00 - 09:30 | 9 | 3698 | 0.126 | 9 | 3698 | 0.057 | 9 | 3698 | 0.183 |
| 09:30 - 10:00 | 9 | 3698 | 0.075 | 9 | 3698 | 0.066 | 9 | 3698 | 0.141 |
| 10:00 - 10:30 | 9 | 3698 | 0.078 | 9 | 3698 | 0.072 | 9 | 3698 | 0.150 |
| 10:30 - 11:00 | 9 | 3698 | 0.084 | 9 | 3698 | 0.063 | 9 | 3698 | 0.147 |
| 11:00 - 11:30 | 9 | 3698 | 0.060 | 9 | 3698 | 0.072 | 9 | 3698 | 0.132 |
| 11:30 - 12:00 | 9 | 3698 | 0.015 | 9 | 3698 | 0.036 | 9 | 3698 | 0.051 |
| 12:00 - 12:30 | 9 | 3698 | 0.054 | 9 | 3698 | 0.078 | 9 | 3698 | 0.132 |
| 12:30 - 13:00 | 9 | 3698 | 0.084 | 9 | 3698 | 0.087 | 9 | 3698 | 0.171 |
| 13:00 - 13:30 | 9 | 3698 | 0.123 | 9 | 3698 | 0.150 | 9 | 3698 | 0.273 |
| 13:30 - 14:00 | 9 | 3698 | 0.057 | 9 | 3698 | 0.069 | 9 | 3698 | 0.126 |
| 14:00 - 14:30 | 9 | 3698 | 0.057 | 9 | 3698 | 0.060 | 9 | 3698 | 0.117 |
| 14:30 - 15:00 | 9 | 3698 | 0.039 | 9 | 3698 | 0.066 | 9 | 3698 | 0.105 |
| 15:00 - 15:30 | 9 | 3698 | 0.036 | 9 | 3698 | 0.069 | 9 | 3698 | 0.105 |
| 15:30 - 16:00 | 9 | 3698 | 0.024 | 9 | 3698 | 0.120 | 9 | 3698 | 0.144 |
| 16:00 - 16:30 | 9 | 3698 | 0.042 | 9 | 3698 | 0.159 | 9 | 3698 | 0.201 |
| 16:30 - 17:00 | 9 | 3698 | 0.012 | 9 | 3698 | 0.150 | 9 | 3698 | 0.162 |
| 17:00 - 17:30 | 9 | 3698 | 0.030 | 9 | 3698 | 0.207 | 9 | 3698 | 0.237 |
| 17:30 - 18:00 | 9 | 3698 | 0.021 | 9 | 3698 | 0.102 | 9 | 3698 | 0.123 |
| 18:00 - 18:30 | 9 | 3698 | 0.024 | 9 | 3698 | 0.141 | 9 | 3698 | 0.165 |
| 18:30 - 19:00 | 8 | 3867 | 0.010 | 8 | 3867 | 0.039 | 8 | 3867 | 0.049 |
| 19:00 - 19:30 | 2 | 5596 | 0.045 | 2 | 5596 | 0.027 | 2 | 5596 | 0.072 |
| 19:30 - 20:00 | 2 | 5596 | 0.009 | 2 | 5596 | 0.027 | 2 | 5596 | 0.036 |
| 20:00 - 20:30 | 2 | 5596 | 0.009 | 2 | 5596 | 0.009 | 2 | 5596 | 0.018 |
| 20:30 - 21:00 | 2 | 5596 | 0.018 | 2 | 5596 | 0.027 | 2 | 5596 | 0.045 |
| 21:00 - 21:30 | | | | | | | | | |
| 21:30 - 22:00 | | | | | | | | | |
| 22:00 - 22:30 | | | | | | | | | |
| 22:30 - 23:00 | | | | | | | | | |
| 23:00 - 23:30 | | | | | | | | | |
| 23:30 - 24:00 | | | | | | | | | |
| Total Rates: | | | 2.148 | | | 2.085 | | | 4.233 |

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

| | |
|---|-------------------------|
| Trip rate parameter range selected: | 260 - 9216 (units: sqm) |
| Survey date date range: | 01/01/14 - 22/11/21 |
| Number of weekdays (Monday-Friday): | 14 |
| Number of Saturdays: | 0 |
| Number of Sundays: | 0 |
| Surveys automatically removed from selection: | 5 |
| Surveys manually removed from selection: | 0 |

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT

OGVS

Calculation factor: 100 sqm

BOLD print indicates peak (busiest) period

| Time Range | ARRIVALS | | | DEPARTURES | | | TOTALS | | |
|---------------|----------|----------|-----------|------------|----------|-----------|----------|----------|-----------|
| | No. Days | Ave. GFA | Trip Rate | No. Days | Ave. GFA | Trip Rate | No. Days | Ave. GFA | Trip Rate |
| 00:00 - 00:30 | | | | | | | | | |
| 00:30 - 01:00 | | | | | | | | | |
| 01:00 - 01:30 | | | | | | | | | |
| 01:30 - 02:00 | | | | | | | | | |
| 02:00 - 02:30 | | | | | | | | | |
| 02:30 - 03:00 | | | | | | | | | |
| 03:00 - 03:30 | | | | | | | | | |
| 03:30 - 04:00 | | | | | | | | | |
| 04:00 - 04:30 | | | | | | | | | |
| 04:30 - 05:00 | | | | | | | | | |
| 05:00 - 05:30 | 2 | 5596 | 0.000 | 2 | 5596 | 0.000 | 2 | 5596 | 0.000 |
| 05:30 - 06:00 | 2 | 5596 | 0.000 | 2 | 5596 | 0.000 | 2 | 5596 | 0.000 |
| 06:00 - 06:30 | 2 | 5596 | 0.009 | 2 | 5596 | 0.000 | 2 | 5596 | 0.009 |
| 06:30 - 07:00 | 3 | 4514 | 0.007 | 3 | 4514 | 0.000 | 3 | 4514 | 0.007 |
| 07:00 - 07:30 | 9 | 3698 | 0.006 | 9 | 3698 | 0.000 | 9 | 3698 | 0.006 |
| 07:30 - 08:00 | 9 | 3698 | 0.009 | 9 | 3698 | 0.015 | 9 | 3698 | 0.024 |
| 08:00 - 08:30 | 9 | 3698 | 0.015 | 9 | 3698 | 0.009 | 9 | 3698 | 0.024 |
| 08:30 - 09:00 | 9 | 3698 | 0.018 | 9 | 3698 | 0.003 | 9 | 3698 | 0.021 |
| 09:00 - 09:30 | 9 | 3698 | 0.015 | 9 | 3698 | 0.009 | 9 | 3698 | 0.024 |
| 09:30 - 10:00 | 9 | 3698 | 0.012 | 9 | 3698 | 0.012 | 9 | 3698 | 0.024 |
| 10:00 - 10:30 | 9 | 3698 | 0.027 | 9 | 3698 | 0.024 | 9 | 3698 | 0.051 |
| 10:30 - 11:00 | 9 | 3698 | 0.018 | 9 | 3698 | 0.009 | 9 | 3698 | 0.027 |
| 11:00 - 11:30 | 9 | 3698 | 0.018 | 9 | 3698 | 0.024 | 9 | 3698 | 0.042 |
| 11:30 - 12:00 | 9 | 3698 | 0.003 | 9 | 3698 | 0.009 | 9 | 3698 | 0.012 |
| 12:00 - 12:30 | 9 | 3698 | 0.006 | 9 | 3698 | 0.012 | 9 | 3698 | 0.018 |
| 12:30 - 13:00 | 9 | 3698 | 0.006 | 9 | 3698 | 0.009 | 9 | 3698 | 0.015 |
| 13:00 - 13:30 | 9 | 3698 | 0.024 | 9 | 3698 | 0.012 | 9 | 3698 | 0.036 |
| 13:30 - 14:00 | 9 | 3698 | 0.006 | 9 | 3698 | 0.003 | 9 | 3698 | 0.009 |
| 14:00 - 14:30 | 9 | 3698 | 0.003 | 9 | 3698 | 0.003 | 9 | 3698 | 0.006 |
| 14:30 - 15:00 | 9 | 3698 | 0.000 | 9 | 3698 | 0.000 | 9 | 3698 | 0.000 |
| 15:00 - 15:30 | 9 | 3698 | 0.006 | 9 | 3698 | 0.006 | 9 | 3698 | 0.012 |
| 15:30 - 16:00 | 9 | 3698 | 0.006 | 9 | 3698 | 0.009 | 9 | 3698 | 0.015 |
| 16:00 - 16:30 | 9 | 3698 | 0.006 | 9 | 3698 | 0.003 | 9 | 3698 | 0.009 |
| 16:30 - 17:00 | 9 | 3698 | 0.000 | 9 | 3698 | 0.006 | 9 | 3698 | 0.006 |
| 17:00 - 17:30 | 9 | 3698 | 0.003 | 9 | 3698 | 0.003 | 9 | 3698 | 0.006 |
| 17:30 - 18:00 | 9 | 3698 | 0.003 | 9 | 3698 | 0.003 | 9 | 3698 | 0.006 |
| 18:00 - 18:30 | 9 | 3698 | 0.000 | 9 | 3698 | 0.000 | 9 | 3698 | 0.000 |
| 18:30 - 19:00 | 9 | 3698 | 0.000 | 9 | 3698 | 0.003 | 9 | 3698 | 0.003 |
| 19:00 - 19:30 | 2 | 5596 | 0.000 | 2 | 5596 | 0.027 | 2 | 5596 | 0.027 |
| 19:30 - 20:00 | 2 | 5596 | 0.000 | 2 | 5596 | 0.027 | 2 | 5596 | 0.027 |
| 20:00 - 20:30 | 2 | 5596 | 0.000 | 2 | 5596 | 0.009 | 2 | 5596 | 0.009 |
| 20:30 - 21:00 | 2 | 5596 | 0.000 | 2 | 5596 | 0.018 | 2 | 5596 | 0.018 |
| 21:00 - 21:30 | | | | | | | | | |
| 21:30 - 22:00 | | | | | | | | | |
| 22:00 - 22:30 | | | | | | | | | |
| 22:30 - 23:00 | | | | | | | | | |
| 23:00 - 23:30 | | | | | | | | | |
| 23:30 - 24:00 | | | | | | | | | |
| Total Rates: | | | 0.226 | | | 0.267 | | | 0.493 |

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

Filtering Summary

| | | |
|--|----------------------|----------------------------|
| Land Use | 02/C | EMPLOYMENT/INDUSTRIAL UNIT |
| Selected Trip Rate Calculation Parameter Range | 150-10000 sqm GFA | |
| Actual Trip Rate Calculation Parameter Range | 260-9216 sqm GFA | |
| Date Range | Minimum: 01/01/14 | Maximum: 22/11/21 |
| Parking Spaces Range | All Surveys Included | |
| Days of the week selected | Monday | 2 |
| | Tuesday | 1 |
| | Wednesday | 2 |
| | Thursday | 3 |
| | Friday | 1 |
| Main Location Types selected | Edge of Town | 9 |
| Population within 500m | All Surveys Included | |
| Population <1 Mile ranges selected | 1,001 to 5,000 | 1 |
| | 5,001 to 10,000 | 4 |
| | 10,001 to 15,000 | 1 |
| | 20,001 to 25,000 | 2 |
| | 25,001 to 50,000 | 1 |
| Population <5 Mile ranges selected | 5,001 to 25,000 | 1 |
| | 50,001 to 75,000 | 1 |
| | 75,001 to 100,000 | 3 |
| | 100,001 to 125,000 | 1 |
| | 125,001 to 250,000 | 3 |
| Car Ownership <5 Mile ranges selected | 0.6 to 1.0 | 2 |
| | 1.1 to 1.5 | 7 |
| PTAL Rating | No PTAL Present | 9 |
| Filter by Site Operations Breakdown | All Surveys Included | |

Calculation Reference: AUDIT-704001-220713-0700

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
 Category : C - INDUSTRIAL UNIT
 TOTAL VEHICLES

Selected regions and areas:

| | | |
|----|-----------------|--------|
| 02 | SOUTH EAST | |
| | HC HAMPSHIRE | 1 days |
| 04 | EAST ANGLIA | |
| | NF NORFOLK | 1 days |
| 06 | WEST MIDLANDS | |
| | WK WARWICKSHIRE | 1 days |
| 08 | NORTH WEST | |
| | CH CHESHIRE | 2 days |
| | LC LANCASHIRE | 1 days |
| 09 | NORTH | |
| | CB CUMBRIA | 2 days |
| 11 | SCOTLAND | |
| | SR STIRLING | 1 days |

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Gross floor area
 Actual Range: 260 to 9216 (units: sqm)
 Range Selected by User: 150 to 10000 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/14 to 22/11/21

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

| | |
|-----------|--------|
| Monday | 2 days |
| Tuesday | 1 days |
| Wednesday | 2 days |
| Thursday | 3 days |
| Friday | 1 days |

This data displays the number of selected surveys by day of the week.

Selected survey types:

| | |
|-----------------------|--------|
| Manual count | 9 days |
| Directional ATC Count | 0 days |

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

| | |
|--------------|---|
| Edge of Town | 9 |
|--------------|---|

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

| | |
|------------------|---|
| Industrial Zone | 8 |
| Development Zone | 1 |

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

Not Known 9 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Filter by Site Operations Breakdown:

All Surveys Included

Population within 500m Range:

All Surveys Included

Population within 1 mile:

| | |
|------------------|--------|
| 1,001 to 5,000 | 1 days |
| 5,001 to 10,000 | 4 days |
| 10,001 to 15,000 | 1 days |
| 20,001 to 25,000 | 2 days |
| 25,001 to 50,000 | 1 days |

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

| | |
|--------------------|--------|
| 5,001 to 25,000 | 1 days |
| 50,001 to 75,000 | 1 days |
| 75,001 to 100,000 | 3 days |
| 100,001 to 125,000 | 1 days |
| 125,001 to 250,000 | 3 days |

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

| | |
|------------|--------|
| 0.6 to 1.0 | 2 days |
| 1.1 to 1.5 | 7 days |

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No 9 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present 9 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

| | | | |
|---------------------|-------------------------|-------------------|-----------|
| Site(1): | CB-02-C-01 | Site area: | 0.79 hect |
| Development Name: | DOMINO'S PIZZA | Gross floor area: | 2950 sqm |
| Location: | PENRITH | Parking spaces: | 48 |
| Postcode: | CA11 9BN | No of Employees: | 70 |
| Main Location Type: | Edge of Town | Survey Date: | 10/06/14 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Tuesday |
| PTAL: | n/a | | |
| Site(2): | CB-02-C-02 | Site area: | 0.17 hect |
| Development Name: | STEEL FABRICATION | Gross floor area: | 715 sqm |
| Location: | CARLISLE | Parking spaces: | 9 |
| Postcode: | CA3 0PJ | No of Employees: | 9 |
| Main Location Type: | Edge of Town | Survey Date: | 15/10/21 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Friday |
| PTAL: | n/a | | |
| Site(3): | CH-02-C-02 | Site area: | 1.63 hect |
| Development Name: | INDUSTRIAL MATERIALS | Gross floor area: | 8100 sqm |
| Location: | CHESTER | Parking spaces: | 61 |
| Postcode: | CH1 4EX | No of Employees: | 100 |
| Main Location Type: | Edge of Town | Survey Date: | 19/11/14 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Wednesday |
| PTAL: | n/a | | |
| Site(4): | CH-02-C-03 | Site area: | 0.91 hect |
| Development Name: | OFFICE FURNITURE | Gross floor area: | 6658 sqm |
| Location: | MACCLESFIELD | Parking spaces: | 97 |
| Postcode: | SK11 0TA | No of Employees: | 122 |
| Main Location Type: | Edge of Town | Survey Date: | 19/09/16 |
| Sub-Location Type: | Development Zone | Survey Day: | Monday |
| PTAL: | n/a | | |
| Site(5): | HC-02-C-01 | Site area: | 1.12 hect |
| Development Name: | ENGINEERING COMPANY | Gross floor area: | 3000 sqm |
| Location: | BASINGSTOKE | Parking spaces: | 124 |
| Postcode: | RG22 4LT | No of Employees: | 110 |
| Main Location Type: | Edge of Town | Survey Date: | 16/06/16 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Thursday |
| PTAL: | n/a | | |
| Site(6): | LC-02-C-04 | Site area: | 0.18 hect |
| Development Name: | POWDER COATINGS | Gross floor area: | 1010 sqm |
| Location: | BLACKPOOL | Parking spaces: | 10 |
| Postcode: | FY3 7XQ | No of Employees: | 5 |
| Main Location Type: | Edge of Town | Survey Date: | 20/06/19 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Thursday |
| PTAL: | n/a | | |
| Site(7): | NF-02-C-03 | Site area: | 0.05 hect |
| Development Name: | SHEET METAL CONTRACTOR | Gross floor area: | 260 sqm |
| Location: | NORWICH | Parking spaces: | 10 |
| Postcode: | NR3 2BB | No of Employees: | 8 |
| Main Location Type: | Edge of Town | Survey Date: | 07/11/19 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Thursday |
| PTAL: | n/a | | |
| Site(8): | SR-02-C-01 | Site area: | 0.38 hect |
| Development Name: | SPECIALIST MODEL MAKING | Gross floor area: | 2350 sqm |
| Location: | STIRLING | Parking spaces: | 33 |
| Postcode: | FK7 7UW | No of Employees: | 36 |
| Main Location Type: | Edge of Town | Survey Date: | 16/06/14 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Monday |
| PTAL: | n/a | | |
| Site(9): | WK-02-C-01 | Site area: | 2.03 hect |
| Development Name: | MACHINE ENGINEERING | Gross floor area: | 9216 sqm |
| Location: | RUGBY | Parking spaces: | 102 |
| Postcode: | CV23 0WB | No of Employees: | 133 |
| Main Location Type: | Edge of Town | Survey Date: | 10/11/21 |
| Sub-Location Type: | Industrial Zone | Survey Day: | Wednesday |
| PTAL: | n/a | | |

MANUALLY DESELECTED SURVEYS

| Site Ref | Survey Date | Reason for Deselection |
|------------|-------------|------------------------|
| BD-02-C-01 | 15/10/20 | N/A |
| CH-02-C-04 | 07/05/21 | N/A |
| GS-02-C-02 | 23/04/21 | N/A |
| LC-02-C-05 | 30/06/21 | N/A |
| VG-02-C-01 | 06/05/21 | N/A |

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT
 TOTAL VEHICLES
 Calculation factor: 100 sqm
 BOLD print indicates peak (busiest) period

| Time Range | ARRIVALS | | | DEPARTURES | | | TOTALS | | |
|---------------|----------|----------|-----------|------------|----------|-----------|----------|----------|-----------|
| | No. Days | Ave. GFA | Trip Rate | No. Days | Ave. GFA | Trip Rate | No. Days | Ave. GFA | Trip Rate |
| 00:00 - 00:30 | | | | | | | | | |
| 00:30 - 01:00 | | | | | | | | | |
| 01:00 - 01:30 | | | | | | | | | |
| 01:30 - 02:00 | | | | | | | | | |
| 02:00 - 02:30 | | | | | | | | | |
| 02:30 - 03:00 | | | | | | | | | |
| 03:00 - 03:30 | | | | | | | | | |
| 03:30 - 04:00 | | | | | | | | | |
| 04:00 - 04:30 | | | | | | | | | |
| 04:30 - 05:00 | | | | | | | | | |
| 05:00 - 05:30 | 2 | 5596 | 0.009 | 2 | 5596 | 0.000 | 2 | 5596 | 0.009 |
| 05:30 - 06:00 | 2 | 5596 | 0.098 | 2 | 5596 | 0.000 | 2 | 5596 | 0.098 |
| 06:00 - 06:30 | 2 | 5596 | 0.009 | 2 | 5596 | 0.000 | 2 | 5596 | 0.009 |
| 06:30 - 07:00 | 3 | 4514 | 0.081 | 3 | 4514 | 0.015 | 3 | 4514 | 0.096 |
| 07:00 - 07:30 | 9 | 3698 | 0.261 | 9 | 3698 | 0.024 | 9 | 3698 | 0.285 |
| 07:30 - 08:00 | 9 | 3698 | 0.168 | 9 | 3698 | 0.036 | 9 | 3698 | 0.204 |
| 08:00 - 08:30 | 9 | 3698 | 0.228 | 9 | 3698 | 0.027 | 9 | 3698 | 0.255 |
| 08:30 - 09:00 | 9 | 3698 | 0.162 | 9 | 3698 | 0.030 | 9 | 3698 | 0.192 |
| 09:00 - 09:30 | 9 | 3698 | 0.126 | 9 | 3698 | 0.057 | 9 | 3698 | 0.183 |
| 09:30 - 10:00 | 9 | 3698 | 0.075 | 9 | 3698 | 0.066 | 9 | 3698 | 0.141 |
| 10:00 - 10:30 | 9 | 3698 | 0.078 | 9 | 3698 | 0.072 | 9 | 3698 | 0.150 |
| 10:30 - 11:00 | 9 | 3698 | 0.084 | 9 | 3698 | 0.063 | 9 | 3698 | 0.147 |
| 11:00 - 11:30 | 9 | 3698 | 0.060 | 9 | 3698 | 0.072 | 9 | 3698 | 0.132 |
| 11:30 - 12:00 | 9 | 3698 | 0.015 | 9 | 3698 | 0.036 | 9 | 3698 | 0.051 |
| 12:00 - 12:30 | 9 | 3698 | 0.054 | 9 | 3698 | 0.078 | 9 | 3698 | 0.132 |
| 12:30 - 13:00 | 9 | 3698 | 0.084 | 9 | 3698 | 0.087 | 9 | 3698 | 0.171 |
| 13:00 - 13:30 | 9 | 3698 | 0.123 | 9 | 3698 | 0.150 | 9 | 3698 | 0.273 |
| 13:30 - 14:00 | 9 | 3698 | 0.057 | 9 | 3698 | 0.069 | 9 | 3698 | 0.126 |
| 14:00 - 14:30 | 9 | 3698 | 0.057 | 9 | 3698 | 0.060 | 9 | 3698 | 0.117 |
| 14:30 - 15:00 | 9 | 3698 | 0.039 | 9 | 3698 | 0.066 | 9 | 3698 | 0.105 |
| 15:00 - 15:30 | 9 | 3698 | 0.036 | 9 | 3698 | 0.069 | 9 | 3698 | 0.105 |
| 15:30 - 16:00 | 9 | 3698 | 0.024 | 9 | 3698 | 0.120 | 9 | 3698 | 0.144 |
| 16:00 - 16:30 | 9 | 3698 | 0.042 | 9 | 3698 | 0.159 | 9 | 3698 | 0.201 |
| 16:30 - 17:00 | 9 | 3698 | 0.012 | 9 | 3698 | 0.150 | 9 | 3698 | 0.162 |
| 17:00 - 17:30 | 9 | 3698 | 0.030 | 9 | 3698 | 0.207 | 9 | 3698 | 0.237 |
| 17:30 - 18:00 | 9 | 3698 | 0.021 | 9 | 3698 | 0.102 | 9 | 3698 | 0.123 |
| 18:00 - 18:30 | 9 | 3698 | 0.024 | 9 | 3698 | 0.141 | 9 | 3698 | 0.165 |
| 18:30 - 19:00 | 8 | 3867 | 0.010 | 8 | 3867 | 0.039 | 8 | 3867 | 0.049 |
| 19:00 - 19:30 | 2 | 5596 | 0.045 | 2 | 5596 | 0.027 | 2 | 5596 | 0.072 |
| 19:30 - 20:00 | 2 | 5596 | 0.009 | 2 | 5596 | 0.027 | 2 | 5596 | 0.036 |
| 20:00 - 20:30 | 2 | 5596 | 0.009 | 2 | 5596 | 0.009 | 2 | 5596 | 0.018 |
| 20:30 - 21:00 | 2 | 5596 | 0.018 | 2 | 5596 | 0.027 | 2 | 5596 | 0.045 |
| 21:00 - 21:30 | | | | | | | | | |
| 21:30 - 22:00 | | | | | | | | | |
| 22:00 - 22:30 | | | | | | | | | |
| 22:30 - 23:00 | | | | | | | | | |
| 23:00 - 23:30 | | | | | | | | | |
| 23:30 - 24:00 | | | | | | | | | |
| Total Rates: | | | 2.148 | | | 2.085 | | | 4.233 |

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Parameter summary

| | |
|---|-------------------------|
| Trip rate parameter range selected: | 260 - 9216 (units: sqm) |
| Survey date date range: | 01/01/14 - 22/11/21 |
| Number of weekdays (Monday-Friday): | 14 |
| Number of Saturdays: | 0 |
| Number of Sundays: | 0 |
| Surveys automatically removed from selection: | 5 |
| Surveys manually removed from selection: | 0 |

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT
OGVS
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

| Time Range | ARRIVALS | | | DEPARTURES | | | TOTALS | | |
|---------------|----------|----------|-----------|------------|----------|-----------|----------|----------|-----------|
| | No. Days | Ave. GFA | Trip Rate | No. Days | Ave. GFA | Trip Rate | No. Days | Ave. GFA | Trip Rate |
| 00:00 - 00:30 | | | | | | | | | |
| 00:30 - 01:00 | | | | | | | | | |
| 01:00 - 01:30 | | | | | | | | | |
| 01:30 - 02:00 | | | | | | | | | |
| 02:00 - 02:30 | | | | | | | | | |
| 02:30 - 03:00 | | | | | | | | | |
| 03:00 - 03:30 | | | | | | | | | |
| 03:30 - 04:00 | | | | | | | | | |
| 04:00 - 04:30 | | | | | | | | | |
| 04:30 - 05:00 | | | | | | | | | |
| 05:00 - 05:30 | 2 | 5596 | 0.000 | 2 | 5596 | 0.000 | 2 | 5596 | 0.000 |
| 05:30 - 06:00 | 2 | 5596 | 0.000 | 2 | 5596 | 0.000 | 2 | 5596 | 0.000 |
| 06:00 - 06:30 | 2 | 5596 | 0.009 | 2 | 5596 | 0.000 | 2 | 5596 | 0.009 |
| 06:30 - 07:00 | 3 | 4514 | 0.007 | 3 | 4514 | 0.000 | 3 | 4514 | 0.007 |
| 07:00 - 07:30 | 9 | 3698 | 0.006 | 9 | 3698 | 0.000 | 9 | 3698 | 0.006 |
| 07:30 - 08:00 | 9 | 3698 | 0.009 | 9 | 3698 | 0.015 | 9 | 3698 | 0.024 |
| 08:00 - 08:30 | 9 | 3698 | 0.015 | 9 | 3698 | 0.009 | 9 | 3698 | 0.024 |
| 08:30 - 09:00 | 9 | 3698 | 0.018 | 9 | 3698 | 0.003 | 9 | 3698 | 0.021 |
| 09:00 - 09:30 | 9 | 3698 | 0.015 | 9 | 3698 | 0.009 | 9 | 3698 | 0.024 |
| 09:30 - 10:00 | 9 | 3698 | 0.012 | 9 | 3698 | 0.012 | 9 | 3698 | 0.024 |
| 10:00 - 10:30 | 9 | 3698 | 0.027 | 9 | 3698 | 0.024 | 9 | 3698 | 0.051 |
| 10:30 - 11:00 | 9 | 3698 | 0.018 | 9 | 3698 | 0.009 | 9 | 3698 | 0.027 |
| 11:00 - 11:30 | 9 | 3698 | 0.018 | 9 | 3698 | 0.024 | 9 | 3698 | 0.042 |
| 11:30 - 12:00 | 9 | 3698 | 0.003 | 9 | 3698 | 0.009 | 9 | 3698 | 0.012 |
| 12:00 - 12:30 | 9 | 3698 | 0.006 | 9 | 3698 | 0.012 | 9 | 3698 | 0.018 |
| 12:30 - 13:00 | 9 | 3698 | 0.006 | 9 | 3698 | 0.009 | 9 | 3698 | 0.015 |
| 13:00 - 13:30 | 9 | 3698 | 0.024 | 9 | 3698 | 0.012 | 9 | 3698 | 0.036 |
| 13:30 - 14:00 | 9 | 3698 | 0.006 | 9 | 3698 | 0.003 | 9 | 3698 | 0.009 |
| 14:00 - 14:30 | 9 | 3698 | 0.003 | 9 | 3698 | 0.003 | 9 | 3698 | 0.006 |
| 14:30 - 15:00 | 9 | 3698 | 0.000 | 9 | 3698 | 0.000 | 9 | 3698 | 0.000 |
| 15:00 - 15:30 | 9 | 3698 | 0.006 | 9 | 3698 | 0.006 | 9 | 3698 | 0.012 |
| 15:30 - 16:00 | 9 | 3698 | 0.006 | 9 | 3698 | 0.009 | 9 | 3698 | 0.015 |
| 16:00 - 16:30 | 9 | 3698 | 0.006 | 9 | 3698 | 0.003 | 9 | 3698 | 0.009 |
| 16:30 - 17:00 | 9 | 3698 | 0.000 | 9 | 3698 | 0.006 | 9 | 3698 | 0.006 |
| 17:00 - 17:30 | 9 | 3698 | 0.003 | 9 | 3698 | 0.003 | 9 | 3698 | 0.006 |
| 17:30 - 18:00 | 9 | 3698 | 0.003 | 9 | 3698 | 0.003 | 9 | 3698 | 0.006 |
| 18:00 - 18:30 | 9 | 3698 | 0.000 | 9 | 3698 | 0.000 | 9 | 3698 | 0.000 |
| 18:30 - 19:00 | 9 | 3698 | 0.000 | 9 | 3698 | 0.003 | 9 | 3698 | 0.003 |
| 19:00 - 19:30 | 2 | 5596 | 0.000 | 2 | 5596 | 0.027 | 2 | 5596 | 0.027 |
| 19:30 - 20:00 | 2 | 5596 | 0.000 | 2 | 5596 | 0.027 | 2 | 5596 | 0.027 |
| 20:00 - 20:30 | 2 | 5596 | 0.000 | 2 | 5596 | 0.009 | 2 | 5596 | 0.009 |
| 20:30 - 21:00 | 2 | 5596 | 0.000 | 2 | 5596 | 0.018 | 2 | 5596 | 0.018 |
| 21:00 - 21:30 | | | | | | | | | |
| 21:30 - 22:00 | | | | | | | | | |
| 22:00 - 22:30 | | | | | | | | | |
| 22:30 - 23:00 | | | | | | | | | |
| 23:00 - 23:30 | | | | | | | | | |
| 23:30 - 24:00 | | | | | | | | | |
| Total Rates: | | | 0.226 | | | 0.267 | | | 0.493 |

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.



0510152025

Metres (1:500)

Site Area: 2.05 Ha

Application Boundary

Existing Trees

Existing Scrub/Hedgerows

Rev:Reason:Date:

Client:
THE HERITAGE DESIGN & DEVELOPMENT TEAM LTD

Project:
LAND WEST OF BERWICK WAY,
ROCHESTER, KENT, ME2 4UT

Title:
EXISTING SITE LAYOUT PLAN

Drawing No:
DHA/30438/02

Rev:
1:500

Scale:
1:500

Date:
FEB 2023

dha

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CAD Reference: DHA_30438_BERWICK_AB02A1

Existing Site Layout Plan
1:500 @ A1