

Our Ref: DP13/2024/02B536836

2nd September 2024

Future Medway
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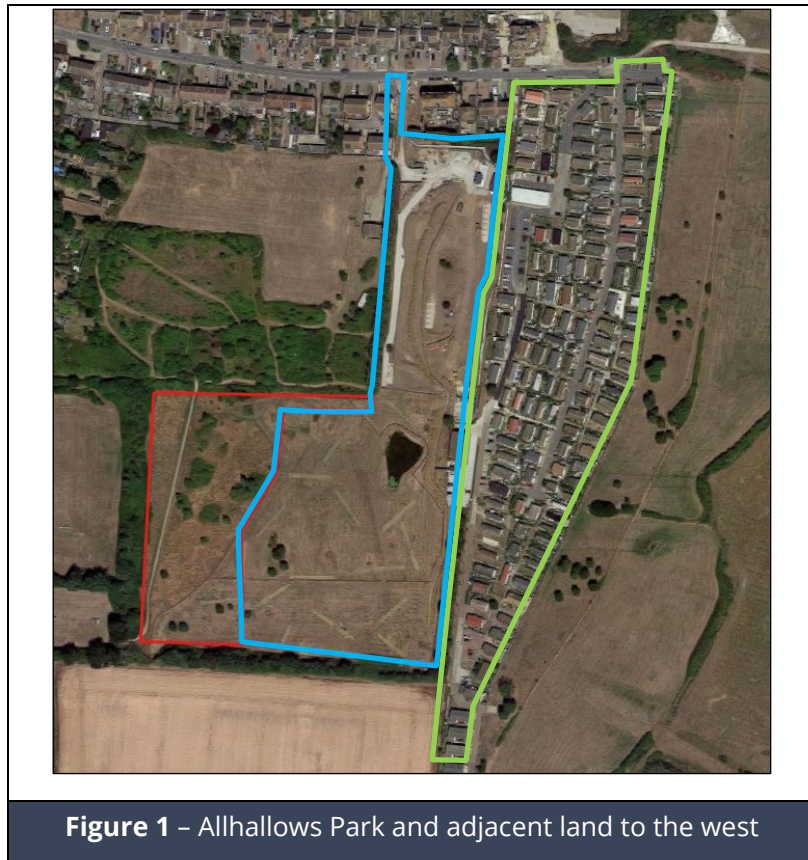
Dear Sir / Madam,

Medway Local Plan 2024 - 2041 | Regulation 18 Consultation

We write on behalf of our client, Turners Parks Group Ltd, who own and operate Allhallows Park (formerly Kingsmead Park, Allhallows), a residential park home site for older people (edged green on **Figure 1**), as well as the land immediately west (edged blue on **Figure 1**) which is currently being developed for 81no. additional park homes (known as The Reeds), and the vacant land further west (indicatively edged red at **Figure 1**). The Park is located in the village of Allhallows-on-Sea on the Hoo Peninsula in Kent, around 500 metres from the coastline of the Thames Estuary as demonstrated by **Figure 2**.

Our client is grateful for the work that Medway Council has and continues to undertake to bring forward a further Regulation 18 Consultation in relation to developing the Medway Local Plan (2022 – 2041) and shares the Council's commitment to Medway's growth as a healthy and diverse place to live and work and to delivering on its broader ambitions locally and more widely.

Against this background, our Client would like to take the opportunity to comment on the consultation document, so that their input may be considered by the Council in further detail and in due course reflected in the text and plans of the emerging Local Plan.



Site History

Paragraph 5.5.36 of the current Medway Local Plan 2003 states that *“The Kingsmead Mobile Home Park, situated to the south of Avery Way, Allhallows, is a permanent mobile home park with the benefit of a full planning permission. The site has provided low-cost housing since 1961 and is quite different in character from the permanent housing at Allhallows itself”*. The following paragraph notes that park homes help provide affordable housing for a small, but significant, number of households.

Accordingly, it is apparent that Allhallows Park (formerly Kingsmead Park) has existed as a residential caravan park since at least 1961. Planning permission (**MC/2000/0097**) for the siting of four additional park homes was granted in 2000 and permission (**MC/16/1398**) for three further park homes was then granted in 2016. Both permissions were within the boundaries of the existing mobile home park.

Within the operator’s current Park Rules for the site, Rule No. 12 states that *‘No person under the age of 50 years may reside in a park home (with the exception of the park warden)’*.

In May 2019, planning permission (**MC/18/0288**) was granted in respect of the land immediately west of the existing mobile home park, which comprised part of Allhallows Golf Course, allowing the *‘Change of use of land for siting of 81 park homes for the purpose of permanent residential accommodation by persons over 50 years old and associated amenity space and allotments, permissive footpath, new pond and alterations to existing pond’*. An extract from the Site Location Plan attached to the permission is shown at **Figure 3**. The remainder of the former Allhallows Golf Course, which now comprises vacant amenity land, lies immediately west of the red line area shown on **Figure 3**.

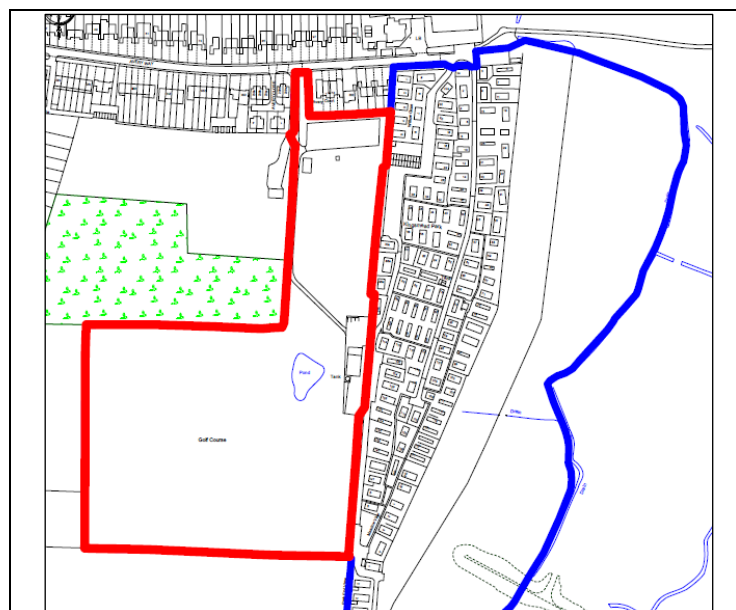


Figure 3 – Site Location Plan attached to MC/18/0288

Medway Local Plan 2041

Section 2.1 - Vision for Medway in 2041

Context - This section of the document sets out the vision to strengthen Medway's position in the economy and culture of the region, connected to its surrounding coast and countryside, its rich heritage, with a thriving economy and where residents enjoy a good quality of life. The vision goes on to state that all sectors and ages of the community can find decent places to live, a sentiment which our client supports.

Response - The vacant amenity land west of Allhallows Park comprises Indicative Preferred Site – Resi-led ref. AS23. Formal allocation of the site for additional residential park home development in parallel with relevant policy support for such development within the emerging Local Plan would bring about an increase in the level of housing choice available in the area directly helping to realise the Council's overarching vision that all sectors and ages of the community can find decent places to live.

Supporting People to Lead Healthy Lives and Strengthening our Communities

Context - This paragraph indicates that one of the proposed objectives for the Plan is *To provide for high quality energy efficient homes that meet the housing needs of Medway's communities, reflecting the range of sizes, types and affordability the area needs, including provision for specialist housing,*

As such, it is apparent that a strategic priority for the emerging Local Plan will be to create a planning policy environment that enables the provision of affordable housing well suited to independent living older people including those looking to downsize and release larger family homes back into the market.

Response - Our Client supports the commentary included within this section in that the Council is seeking to provide homes of varying types in order to meet demand in Medway and ensuring a cohesive, sustainable approach. In addition, the Strategic Objective of meeting the housing needs of Medway's communities and reflecting the requirement for affordable housing and the range of sizes and types that the area needs, including the provision for specialist housing such as '... the elderly including those wanting to down size' is welcomed.

Single storey, accessible and adaptable park homes with a small garden and situated within a friendly mutually supportive community represent a low maintenance option particularly suited to older people, which is significantly cheaper than comparable brick-built bungalows with a small garden in the same housing market area. They provide an important source of affordable housing in the market forming a bridge between social housing and mainstream market housing, especially for those seeking to reduce their housing costs in older age, and make a significant contribution towards the provision of homes of varying types to meet demand in Medway.

The parcel of land immediately west of the existing Allhallows Park, comprising part of a former golf course, has been granted permission for the provision of 81 park homes. A significant opportunity remains, however, to provide further new park homes for the over-50s on the land further west (Indicative Preferred Site – Resi-led ref. AS23) which comprises the disused remainder of the former golf course.

Section 6 – Housing

Context - This opportunity to deliver additional single storey, low-cost park homes for older people is particularly relevant given the identified local need for such dwellings over the next plan period and given the Council's lack of a five-year housing land supply accordingly to the latest published figures. It is noted that paragraph 6.1.2 of the consultation document confirms the identified housing need over the next plan period, based on the Government's Standard Method for calculating Local Housing Need is 1,658 homes per year, resulting in approximately 26,000 new homes during the plan period.

Response - Our Client acknowledges the housing issues that the Council have alluded to within the introductory paragraphs in that rising costs of housing is placing significant pressure on people, with many people unable to afford to access the 'housing ladder' whilst also facing issues of availability and rising costs in the private, rented sector. Within Paragraph 6.1.2, the Client supports the Council's primary purpose of the new Local Plan to meet the needs of Medway's communities for housing.

Section 6.2 – Housing Mix

Response - This section denotes that as Medway's population grows and changes, the Council have set out that they need to ensure that they plan for the right mix of housing, reflecting the size of households and the demographics of communities. The Client agrees with this approach, and the further supporting text which states that a wide range of housing provisions must be made including for older people.

Context - One of the questions posed by the LPA as part of their consultation relates to **Policy T2** in relation to Housing Mix, with the Council seeking to understand if the policy provides effective guidance on the required housing mix in Medway?

The policy denotes that the Council is seeking to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population. Residential development will only be permitted if it encourages a sustainable mix of housing that includes an appropriate range of house types and size to address local requirements. The mix must be appropriate to the size, location and characteristics of the Site as well as to the established character and density of the neighbourhood.

Response - In order to supplement the draft phrasing of Policy T2, our Client proposes the inclusion of specific reference to Park Homes (residential caravans) in terms of the respective housing mix that the Council are seeking to provide, and could be phrased as such:

*'Residential development will only be permitted if it encourages a sustainable mix of housing that includes an appropriate range of house types and size, **including Park Homes**, to address local requirements, as evidenced through the Medway LHNA, or updated reports.*

The inclusion of this phrasing will further embellish **Policy T6**.

Section 6.6 – Mobile Home Parks

Context - Within Paragraph 6.6.2, the Council have acknowledged that there are two main residential park home estates, one at Hoo Marina Park and the other being Kingsmead Park at Allhallows, which is highlighted in green within **Figure 1**, and under our client's ownership.

Response - Our Client welcomes the introduction by the Local Planning Authority of **Policy T6** relating to Mobile Home Parks. It is positive to read that the Council recognises that park homes are a popular form of housing, particularly in some age groups, and that the Council recognises that they help to provide a chouse of housing in Medway. It is suggested, for the avoidance of doubt going forward, that the policy wording be updated from Kingsmead Park to the site's current name Allhallows Park.

Context - Turning to the wording of **Policy T6** itself, the first paragraph denotes that *'Proposals for mobile or park home developments will be given the same consideration as other dwellings and will be subject to the same compliance with planning policy in assessing impact and sustainability'*. The Policy goes on to state that *'The Council seeks to protect existing parks from competing uses and restrict their expansion outside designated areas to limit adverse environmental impacts to the surrounding green and open spaces. It will restrict intensification beyond density guidelines and seek opportunities to enhance the design and visual impact on the surrounding area, particularly those near areas of sensitive environmental interests'*.

Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Kingsmead Mobile Home Park, or a reduction in the area available for their use will not be permitted.

Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.

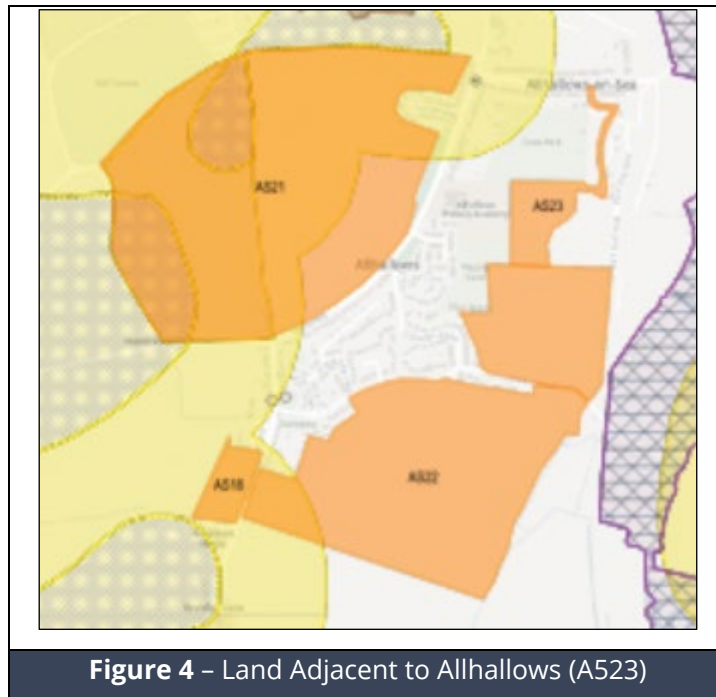
Any proposals for updates or intensification must be carefully considered for the colour, massing and materials used, incorporate appropriate landscaping, and have no adverse impact on the character of the locality or amenity of nearby residents'.

Response - In relation to this matter, it is proposed that Park Homes should not be tested against the same methodology as traditional bricks and mortar properties given that they are already assessed against Model Standards for Caravans in England (BS3632). As such, our client recommends that this element of the proposed wording be removed from this part of **Policy T6**.

Our client is pleased to understand, as detailed at Paragraph 6.6.3 those previous consultations in relation to this topic support this form of housing, whilst also providing a wider choice across

Medway, and that the Council will seek to support the retention of mobile homes in order to assist in maintaining the supply and mix of accommodation available across the area.

Context - At this point, it must be acknowledged that the neighbouring site adjacent to the existing Allhallows Park Site, as detailed on the North-East Policies Map is allocated as an indicative residential led preferred site (Ref. AS23) as demonstrated by **Figure 4** below. This area of land was previously put forward as part of the Call for Sites process, with the representation since considered and included as a preferred site.



It is acknowledged within the consultation document that most of the sites which have been put forward for potential development are promoted for housing-led development, each potentially providing land for hundreds of homes. However, in view of the proposed Local Plan objectives discussed above, it is crucial to ensure that sufficient sites come forward and are offered policy support to meet the diverse housing needs of Medway's various communities and provide the necessary 'specialist' housing such as for the downsizing elderly, as would be the case with our client's land shown at **Figure 4**.

Response - At present, the wording of the above seeks to restrict any expansion outside of designated areas in order to limit any adverse environmental impact. Our client proposes that the aforementioned preferred site be allocated for additional park home development in order to strengthen the existing Allhallows Park Site, whilst also ensuring that there would not be any increased impact on the nearby sensitive, environmental areas found locally. Given the proximity of the Site to both the existing Park as well as the village of Allhallows-on-Sea itself, it should be

seen to present a logical opportunity for siting additional park homes at a well-run existing park to continue to address the housing needs of the older generation.

Sustainability Appraisal of the Medway Local Plan

This appraisal, conducted by Lepus Consulting, has been prepared for the purpose to assess the draft policies and options presented in the Medway Local Plan Regulation 18 Consultation document, and includes options for:

- Housing and employment growth;
- Broad locations for new development;
- The overall spatial distribution of new growth; and
- Development sites.

Paragraph E.6.6.5 acknowledged that Site AS23 is proposed for the development of Park Homes and that the potential increase in air pollution as a result of any proposed development is uncertain. One manner in which the Council can reduce any level of uncertainty is to allocate the Site for park home development purposes as detailed above. (56)

Paragraph E.8.1.3 sets out that 224 sites are likely to result in a minor, positive impact as they propose a capacity of 99 dwellings or less and includes AS23 which is proposed for the development of Park Homes. A minor positive impact is identified for this site as the proposed development would help to meet the varying accommodation needs of Medway's population, something which the Client supports. (67)

Within Table E.1.1 which sets out Reasonable Alternative Sites in Medway, AS23 is referenced with a proposed, residential led use, albeit for park home purposes. The Table also denotes that the housing capacity of the Site would be nil, despite acknowledging that a residential led use of the Site can come forward. As detailed above, should the Council adopt our Client's suggestion that Park Homes be included with **Policy T2**, the Site will then be able to support the Council in meeting its five year housing land supply targets. (89)

Reg 18 Consultation Summary

What are the key issues that you want the plan to address, and how?

On page 3 of the Consultation Summary document, the Council outline a need to provide 1,658 new homes a year in order to keep up with Medway's predicted population growth, totalling almost 28,000 new homes during the plan period to 2041. Furthermore, it sets out that the Local Plan will provide a strategy for how they can do this sustainably while providing homes for everyone, from first-time buyers and growing families to downsizers, retirement homes and accessible homes for people with disabilities.

The provision of Park Homes will assist the Council in meeting their strategy to provide homes for everyone, given the dual benefits of such development. This is in the sense that park homes provide not only a significant opportunity for older generations to downsize into more suitable single storey and easier to maintain properties, but doing so also releases their previous property to families seeking to get on, or move up, the 'housing ladder'.

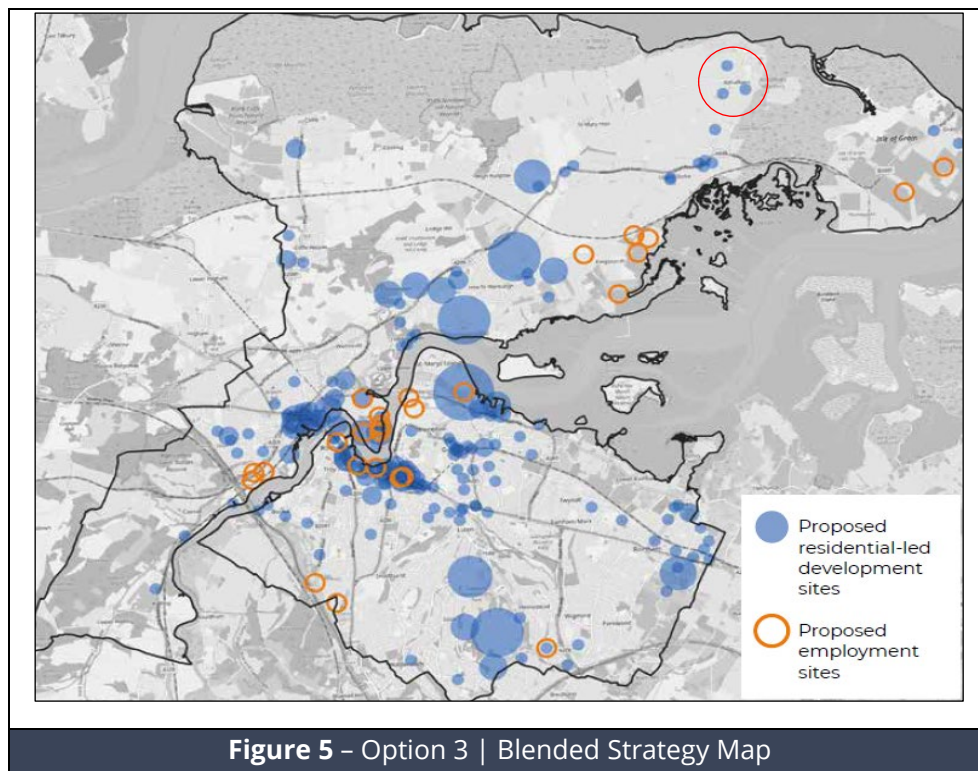
Which of the growth options do you prefer and why?

As part of the summary document, the Council have set out three spatial growth options including details on proposed policies and potential areas of development, and are broken down into 'Urban Focus', 'Dispersed Growth' and a 'Blended Strategy', which is the preferred option.

The Blended Strategy seeks a 'brownfield first' focus with regeneration in urban centres and waterfront locations, complemented by a range of sites in suburban and rural areas, of which the allocation at Allhallows is included, as demonstrated at **Figure 5** below. About half of the development would be on brownfield land, providing for a range of housing types and density.

What are the most important issues for you in planning new developments?

On the whole, the Council set out that this option is likely to ensure a diverse range of housing types and tenures can be provided across Medway and economic needs can be met whilst directing the majority of new development to sustainable locations. Our client supports the approach taken by the Council and its inclusion of our Site for the development of Park Homes, which in turn meets the requirements in terms of housing types and tenures.



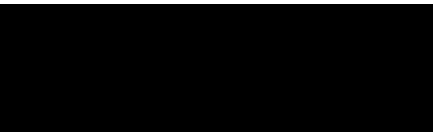
Conclusion

Our client, like everyone connected with the wider Medway area, has a strong desire to see it thrive economically, environmentally, and socially over the plan period to 2040. It is the view of our Client that Allhallows Park and the adjacent land to the west can be of particular assistance to Medway Council in meeting its ambitions to provide suitable housing for all sectors of the community. This is provided that emerging Local Plan policies continue to support the retention of the existing site, but also go further to introduce support for the improvement of the site and its expansion onto the adjacent vacant land.

We trust that our above comments and suggestions in relation to the Regulation 18 Consultation Documents of the Local Plan will be fully considered and acted upon so that the emerging Local Plan is fully in accordance with adopted National Planning Policy whilst also contributing towards the Council's ambition of achieving sustainable residential development benefitting all parts of the community.

Should any further details be required, please do not hesitate to contact me directly using the details below.

Yours faithfully



Daniel Phillips MRTPI
Senior Planner | Place - Leisure



For and on behalf of Avison Young (UK) Limited

Medway Local Plan 2041

Regulation 18 Representations

September 2024

Diocese of Rochester

Prepared by:

Savills (UK) Limited
74 High Street, Sevenoaks, TN13 1JR



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1. Introduction

- 1.1. Savills have been instructed by the Diocese of Rochester (**DoR**) to prepare representations to the Draft Medway Council Regulation 18 Consultation (**R18b**). The consultation on the Local Plan commenced on the 15th June and closes on the 8th September 2024.

Background to the Diocese of Rochester

- 1.2. DoR is one of 41 dioceses of the Church of England, and was established by St Augustine in 604AD. Geographically, the Diocese covers North and West Kent and the London Boroughs of Bromley and Bexley and comprises 2016 parishes with 239 churches serving a population of around 1.3 million. The DoR is a landowner with a land portfolio that extends across Medway and Kent.

Scope of Representations

- 1.3. In addition to responding to the most pertinent questions relevant to DoR, these representations focus on 2 parcels of land within the Ownership of the Diocese:
- Land at Pilgrims Road, Halling; and
 - Land at Vicarage Road, Halling (herein referred to as '**the Sites**').
- 1.4. The Sites have previously been submitted to Medway Council as part of the most recent Call for Sites (January 2023). They are identified within the Medway Land Availability Assessment (September 2023), which forms part of the evidence base for the emerging Local Plan (*Land at Pilgrims Road- Site ID: CHR2, Land at Vicarage Road, Halling - Site ID: CHR5*). The Sites were also promoted through previous iterations of the Local Plan, most recently during the Regulation 18 Part A process in October 2023 (**R18a**).
- 1.5. The National Planning Policy Framework (**NPPF**) explains that the planning system should be plan-led, and Paragraph 34 of the Planning Practice Guidance (**PPG**) states that there is considerable flexibility open to local planning authorities in how they carry out the initial stages of local plan production, provided they comply with the specific requirements in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, ('the Local Plan Regulations') including the need to notify relevant stakeholders of the consultation and their opportunity to make representation.
- 1.6. At examination, a Plan will be found 'sound' if it is considered to be positively prepared, justified, effective and consistent with national policy (paragraph 35 of the NPPF). As such, ensuring that the Local Plan meets the tests of soundness is important throughout the Local Plan process. The comments made within these representations are to support Medway Council in preparing a sound plan.

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Draft NPPF

- 1.7. A draft NPPF was launched for consultation on the 30th July¹. At this present time as emerging policy this document has limited weight. However, it provides a clear statement of intent that the new Labour Government is looking to increase the supply of housing in England. Reference to provisions within this emerging document, including the Grey Belt have therefore been made where appropriate.
- 1.8. As part of this Draft Local Plan consultation, Medway has published an evidence base comprising a number of supporting documents. We have made comments on two documents as part of this representation. These documents are listed below.
- **Interim Sustainability Appraisal of the Medway Local Plan 2025 – 2041 (June 2024)**
 - **Medway Landscape Character Assessment (June 2024)**

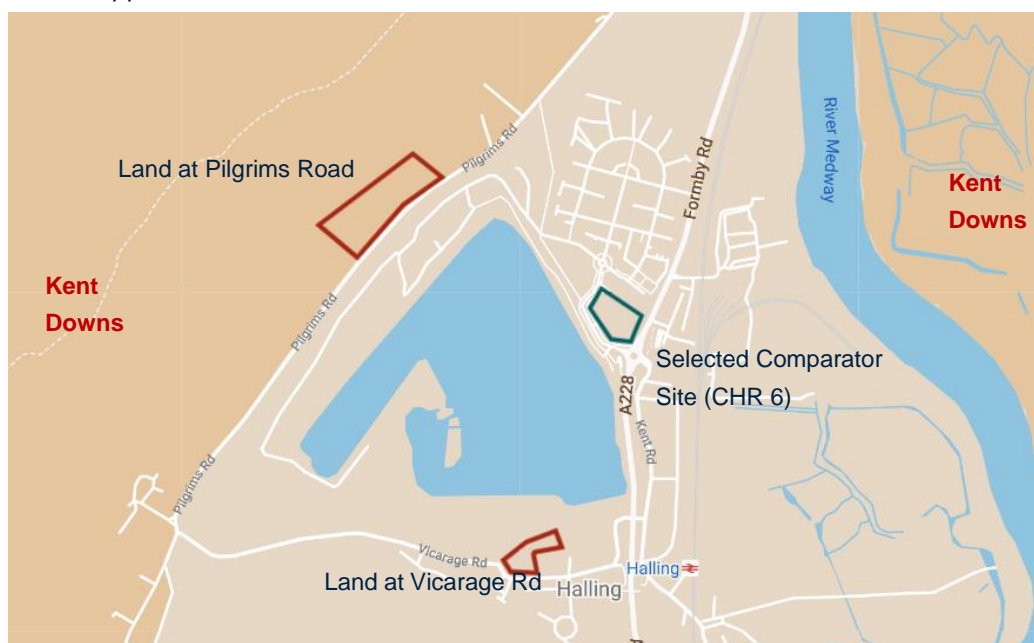
¹ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

2. The Sites

Overview

- 2.1. The two Sites are each located to the west of the village of Halling (Figure 1) within the Medway Valley to the Southwest of the Medway Council area.
- 2.2. Halling is a large village (population 2,927, 2021 census). The A228 cuts through the village, the centre is focussed along the High Street, situated to the east of the A228 and which lies broadly on a north to south alignment, with the River Medway beyond. Halling train station, and its associated car parking areas lie to the east of the High Street and provides frequent services to Strood and Maidstone.
- 2.3. The village also contains a number of shops and services which serve residents:
- The Church of Saint John the Baptist
 - Public houses (Homeward Bound and Five Bells);
 - A community centre;
 - A local shop; and
 - A petrol station;
- 2.4. Beyond the urban areas, the landscape comprises quarries and pits set aside arable farmland, woodland, and salt marshes. The former chalk quarry is a dominant and substantial man-made topographical feature which is cut into the hillside to the north and northwest of the village. St Andrew's Lake within part of the former quarry is situated at the bottom of the cutting.

Figure 2.1: Approximate Site Boundaries



Land at Pilgrims Road

- 2.5. The land at Pilgrims Road is a single rectangular shaped open parcel of agricultural land (grade 3 and 4), to the west of Halling. The Site occupies an area of around 3.04ha. The Site lies on an east facing hillside with St Andrews Lake and associated water sports centre at the base of the Hill (Figure 2.2).
- 2.6. The new St Andrews Park housing development is located around 300m to the East, with the wider settlement of Halling beyond this to the south. The Site is not located within the Village boundary. It is located within the Kent Downs National Landscape (**AONB**), Metropolitan Green Belt and local Area of Local Landscape Importance.
- 2.7. The Site is enclosed by dwellings to the east, hedgerows. Due to this, the site is not readily visible in views and development of the site would not affect the setting of the AONB or the perceived openness of the Green Belt. In conclusion that there is no significant overriding landscape constraints that should prevent the site from being allocated.
- 2.8. The vast majority of the agricultural land is classified as Grade 4 (poor quality) and the rest is Grade 3 (good to moderate quality). There is an abundance of high-quality agricultural land in the North Kent area², and the loss of a 3-hectare site on the edge of a village will not affect the overall supply of productive agricultural land in the area.
- 2.9. Representations were made as part of the 2023 Call for Sites process for a sensitive development comprising a modest amount of housing would not compromise the character of Halling or the Green Belt, including its openness. The Site is identified within the Medway Interim Sustainability Appraisal for non-residential uses (Site Ref CHR2).

² Regional Agricultural Land Classification Maps (<https://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>)

Figure 2.2: Pilgrims Road, Site Plan



Land to the North of Vicarage Road

- 2.10. The 0.5ha parcel comprises a small area of open land fronting Vicarage Road, alongside a small, wooded area beyond this (Figure 2.3). The Site is not within the village boundary of Halling, however lies adjacent to existing residential; development on its southern and eastern sides. The Site is currently located within the Green Belt.
- 2.11. A pre-application submission was made to Medway Council in 2018 for the construction of 9 houses (Ref PRE18/1288). This detailed that a proposed scheme: *“is unlikely to be acceptable in principle due to the impact on the green belt. Furthermore, it considers: “as it is outside the village confines it is unlikely to be considered acceptable as an infill development.”*
- 2.12. The Site benefits from having a character that is distinctly different to the wider Green Belt to the west. Furthermore, it is noted that the site is not readily discernible in views from the west and therefore development of the site would not affect the setting of the nearby AONB.

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- 2.13. The site also provides the opportunity for new rural housing to contribute towards social and economic infrastructure within the village. There are no significant overriding landscape constraints that should prevent the site from being allocated.
- 2.14. Representations were made as part of the 2022 Call for Sites process for a sensitive development comprising a modest amount of housing which would not compromise the character of Halling or the Green Belt, including its openness. The Site is identified within the Medway Interim Sustainability Appraisal for non-residential uses (Site Ref CHR5).

Figure 3: Land at Vicarage Road, Site Plan



3. Evidence Base

3.1. Medway has published a limited evidence base to support the R18 Local Plan consultation. Of the documents that are published, the following are examined in this section:

- Interim Sustainability Appraisal of the Medway Local Plan 2025 – 2041 (June 2024)
- Medway Landscape Character Assessment (June 2024)

Interim Sustainability Appraisal of the Medway Local Plan 2025 – 2041 (June 2024)

3.2. The Sustainability Appraisal (**SA**) is an important evidence-based document. It examines the extent to which the Draft Plan achieves relevant environmental, economic, and social objectives when assessed against reasonable alternatives. It then considers the most sustainable option that Medway should be taking forward in the Draft Plan.

3.3. The SA outlines the requirement for Medway under the Duty to Co-operate to potentially accommodate an unmet need of approximately 2,000 homes from Gravesham (**GBC**)³. In setting out the proposed strategy the SA details that Medway have not accounted for this unmet housing need.

“Gravesham Borough Council has notified Medway Council of an estimated unmet housing need of 2,000 homes through responses to consultations and duty to cooperate meetings. Medway Council has requested further information from Gravesham Borough Council to demonstrate the unmet housing need. In the meantime, Option 2 cannot be justified.

Option 1 has been shown to perform better compared to Option 2, and therefore Option 1 forms the basis of Medway Council’s proposed spatial strategy in the Regulation 18 consultation in July 2024”.

3.4. However, alongside considering GBC’s unmet needs Medway also need to work with other neighbouring authorities where unmet housing needs may arise. For example, Tonbridge and Malling Borough Council (**TMBC**) is currently preparing a new local plan and is constrained by the Green Belt and the Kent Downs National Landscape. Given that TMBC are midway through the preparation of their new plan with a housing need that will increase by over 400 dpa if the new standard method is adopted, Medway will need to have discussions with TMBC to ascertain their position with regard to housing delivery and consider whether some of these unmet needs could be addressed in Medway.

3.5. The progression of the plan without attempting to accommodate this unmet need means that the R18 plan is not positively prepared under paragraph 35 of the NPPF.

³ Gravesham’s current housing need is set to increase under Labour’s proposed reforms to housing numbers

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- 3.6. The SA includes two assessments, a pre- and post- mitigation assessment for all identified sites against 12 categories. A traffic light scoring system is used by Medway and is repeated here (dark red being a major negative impact and dark green being major positive impact; lighter colours between these two representing minor or neutral impacts). Both pre and post mitigation tables are summarised relating to the Sites alongside the nearby selected site at St Andrews Lakes (CHR 6) as a comparator local site (Refer to Figure 2.1 for the location of this Site). The DoR Sites have been given the reference numbers CH2 (Land at Pilgrims Road) and CH5 (Land at Vicarage Road).

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Site Assessment (Lepus Consulting)

		Land at St Andrews Lakes (CHR 6)	Land at Pilgrims Road (CHR2)	Land at Vicarage Road (CHR 5)
	Size	1.0ha	3.01ha	0.78ha
	Capacity (as identified within the SA)	88 homes	0	0
1. Climate change mitigation	Pre-Mitigation	+/-	+/-	+/-
	Post Mitigation	+/-	+/-	+/-
2. Climate change adaptation	Pre-Mitigation	--	+	+
	Post Mitigation	+	+	+
3. Biodiversity and geodiversity)	Pre-Mitigation	-	--	-
	Post Mitigation	-	--	-
4. Landscape and townscape	Pre-Mitigation	-	--	-
	Post Mitigation	-	-	-
5. Pollution and waste	Pre-Mitigation	-	--	-
	Post Mitigation	-	--	-
6. Natural resources	Pre-Mitigation	+	-	-
	Post Mitigation	+	-	-
7. Housing	Pre-Mitigation	+	0	0
	Post Mitigation	+	0	0
8. Health and wellbeing	Pre-Mitigation	-	-	-
	Post Mitigation	-	-	-
9. Cultural heritage	Pre-Mitigation	0	0	0
	Post Mitigation	0	0	0
10. Transport and accessibility	Pre-Mitigation	-	-	++
	Post Mitigation	++	+	++
11. Education	Pre-Mitigation	-	0	0
	Post Mitigation	0	0	0
12. Economy and employment	Pre-Mitigation	+	++	++
	Post Mitigation	+	++	++

Impact Significance Key (Lepus Consulting)

Major Negative	--	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Permanently degrade, diminish, or destroy the integrity of a quality receptor, such as a feature of international, national, or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative	-	<ul style="list-style-type: none"> • The size, nature and location of development proposals would be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible	0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain	+/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive	+	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive	++	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, contributing at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national, or regional designation.

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- 3.7. Further to this work the SA provided the following short assessment of each of the assessed sites, as made by Medway council;

Nearby Selected Site (Comparator Site)

CHR6, Selected – Residential Led: *The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development, supporting improved services.*

DoR Sites

CHR2, Rejected – Non-Residential: *Close proximity to SSSI. Potential loss of BMV agricultural land. Within the Green Belt. Encroaches on Kent Downs National Landscape. Beyond reasonable walking distance to current public transport services.*

CHR5, Rejected – Non-Residential: *Potential loss of BMV agricultural land. Within the Green Belt.*

- 3.8. Beyond the conclusions set out above, the R18b evidence base documents do not include any further reports providing a more detailed assessment of the assessed Sites. For transparency, this information should be provided particularly where indicative Sites are shown for allocation on the draft policies map. The current draft plan and its evidence base do not provide any justification as to why certain sites are shown as draft allocated and others are not. This is therefore not a justified approach.
- 3.9. The two DoR Sites were assessed for non-residential use within the SA, despite being previously promoted by Savills on behalf of the DoR for residential use. It is therefore not considered a fair assessment of these Sites has been undertaken. Both CH5 and CH2 were rejected due to the “*Potential loss of BMV agricultural land*”. CH5 (Land at Vicarage Road) site has not been used for agricultural and there is no intention to use it as such. CH2 (Land at Pilgrims Road) predominantly consists of Grade 4 (Poor quality agricultural land). On this basis it is unclear why both DoR Sites have been given minor negative ratings for the Natural Resource category.
- 3.10. The positive pre and post mitigation ratings for Land at Vicarage Road relating to climate change adaption, Transport and Accessibility and Economy and Employment are supported by the DoR.
- 3.11. It is clear that the overall sustainability of the 2 DoR Sites is similar to the nearby selected comparator residential Site (CHR6), particularly if they are considered for residential use (as per this submission, and the previous submissions).

Medway Landscape Character Assessment (June 2024)

- 3.12. The Medway Landscape Character Assessment (**MLCA**) prepared by LUC updates the previous Landscape Character Assessment undertaken by Medway Council in 2011. The MLCA aims to identify the features and characteristics to provide an assessment of the landscape character across Medway. The landscape has been sub-divided into Landscape Character Types (areas which share similar patterns of Geology) and Landscape Character Areas (Areas which share generic characteristics with other areas of the same type but have their own particular identity or 'sense of place'). This process resulted in the definition of eight LCTs and 34 LCAs for Medway. Both the DoR sites are located within the chalk scarp and scarp foot landscape type area.

Land at Pilgrims Road

- 3.13. The MLCA confirms this Site constitutes Grade 4 land. The Site is located within the Landscape Character C3 (Halling Scarp West). This area is described as: *"a steeply sloping scarp featuring extensive woodland cover and open arable farmland"* (7.27).
- 3.14. The MLCA recommends avoiding further settlement expansion upon the upper slopes, and *"resisting further development along Pilgrims Road"*. The DoR object to this position, which fails to consider the extent of the existing built environment along Pilgrims Road, which is indiscernible in longer views from the valley bottom due to the extent of exiting screening provided by the surrounding heavily wooded environment. Furthermore, no clear rationale is provided in the MCLA as to why further development should be resisted along Pilgrims Road.
- 3.15. The MLCA also recommends that: *"If development is proposed it should look to minimise its impact through careful design, in terms of siting, form, scale, massing, materials and the use of locally characteristic woodland blocks/shaws and hedgerows."* The DoR support this position (i.e. that with mitigation the impact of development can be minimised in this location). DoR will undertake further feasibility work in relation to landscape impacts and associated mitigation to demonstrate that the site is suitable for development.

Land at Vicarage Road

- 3.16. The Site is located within Landscape Character C4 (Halling Scarp Foot). This is described as: *"a rolling scarp foot landscape strongly influenced by former chalk quarrying. It comprises arable farmland, disused quarries (largely colonised by scrub and pioneer woodland) and other remnant industrial features"* (7.29). The DoR agrees with this description which recognises the previous industrial character of the area and the impact such uses had upon the landscape.
- 3.17. The MLCA details that large or visually intrusive development would be detrimental within the more visually open parts of the landscape, including the visual setting of the adjacent Western and Eastern Scarp Areas of the Kent Downs National Landscape. The Vicarage Road site has an indicative capacity of between 20 and 30 homes. If it is allocated, it will enable a small site to come forward, which will avoid these detrimental implications upon the landscape by virtue of its screened setting and its location in the established built area.

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- 3.18. The MLCA also recommends maintaining the sense of openness between Upper Halling and Halling. The indicative proposals demonstrate that development of the Land at Vicarage Road will not reducing openness, while enabling the delivery of much needed housing within the locality.

4. Comments on Regulation 18 Local Plan

- 4.1. The current consultation document aims to build on the responses to the previous R18a consultation 'Setting the Direction for Medway 2040' in Autumn 2023, which set out to define the overarching vision and strategic objectives for the new Local Plan. The DoR submitted representations to the R18a consultation which should be read alongside these representations.

Housing Supply and Locations of Growth

- 4.2. The policies and spatial strategy within the R18b plan fails to set out how and where Medway will meet its housing needs. Indicative locations further to the SA are set out within the Policies map. However, no detail is provided as to the overall capacity of these Sites. Further work is therefore needed on this aspect to the Plan, alongside establishing the unmet need from Gravesham that may also need to be required within Medway.
- 4.3. Medway's "*high housing need*" alongside "*complex sensitive areas and constraints, such as the natural and historic environment and infrastructure capacity*" form the overarching backbone to the plan. Key to the soundness of the plan, is for the Council must ensure that it meets its identified housing needs in full determined by national policy, alongside any unmet needs from neighbouring areas where it is practical to do so.
- 4.4. The DoR supports the use of the Standard Method (and the successor methodology proposed by the new Labour Government) as per NPPF paragraph 61 that seeks to boost housing and make an efficient use of land. As of March 2024, the Standard Method details a need of 1,658 homes per year. Whilst an updated Standard Method formula is currently at consultation which will see a slight reduction to 1,644 homes per year within Medway. As we have previously noted the neighbouring authorities of GBC and TMBC are likely to see their local housing needs increase by 32 dpa and 237 dpa and Medway will need to work with these authorities to ensure housing needs across the sub-regional housing market are met in full.
- 4.5. The draft NPPF and accompanying WMS is clear that the Standard Method is used as the basis for determining local authorities' housing requirements in all circumstance. The plan-making process should follow this process in order to be found sound.
- 4.6. The most recent Local Authority Monitoring Report (December 2023) (**AMR**) stated the following: "*In 2022/23 950 units were completed, making the past five years the highest number of dwellings delivered in a five-year period since Medway became a Unitary in 1998. However, for 2022/23 it was still 717 dwellings below the requirement of 1,667*" (pg.31).
- 4.7. It was also acknowledged that greenfield sites were having a positive effect on the number of new homes being built, however this needed to be sustained to increase the rates of delivery and to pass the Housing Delivery Test in future years.

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4.8. Savills research on housing supply and delivery⁴ has detailed an over reliance upon larger sites makes housing delivery more likely to miss targets. Greater complexity, higher costs and large infrastructure requirements can all generate delays. The research is clear: *“We need to quickly reverse the decline in smaller sites gaining planning consent. It is a major barrier to growth for housebuilders of all types, but especially for SMEs and new entrants. Smaller sites are less complex and less expensive to deliver. They reach completion quicker, releasing capital for new investment at a faster rate than larger site”*.

4.9. The Savills research describes the decrease in planning consent upon smaller sites as a *“clear threat to housing delivery over the next few years”*. The DoR Sites provide an opportunity to deliver housing upon two small and sustainably located Sites. With the above in mind, the Council should seek to boost housing in their area by ensuring that the right mix of homes come forward, in the right location, and on the sites most capable of delivering promptly. Taking this pro-active view is in accordance with the WMS and the general direction that the new Labour government is advocating.

Locations of Growth

4.10. The AMR expects Greenfield development to play a key role in enabling Medway to deliver its required housing targets. The AMR details: *“The council continues to promote regeneration and reuse of brownfield sites but has recognised the need to deliver greenfield sites outside the current Local Plan boundaries to meet the identified local housing need”* (Pg.17).

4.11. The R18b plan identifies three alternative spatial distributions of growth, as identified within the interim Sustainability Appraisal.

- SGO 1 – Urban Focus - maximising development on brownfield sites in urban centres and waterfront sites
- SGO 2 – Dispersed Growth – much higher release of land on greenfield and Green Belt sites
- SGO 3 – Blended Strategy - brownfield first’ focus with regeneration in urban centres and waterfront locations, complemented by range of sites in suburban and rural areas.

4.12. SGO 3 is identified as the preferred option, which is supported by DoR as providing for the greatest range of housing and allow for market flexibility. It should also be noted that there are often significant constraints on urban brownfield sites, including infrastructure costs which can affect their delivery or result in a reduction of benefits such as affordable housing, which could impact upon the ability of such Sites to deliver the required level of housing required while strategic developments, that will form a significant part of the council’s land supply, are rarely built out as expected. While DoR support SGO 3 as a growth option, further research is required to demonstrate which sites are the most suitable to come forward. Currently there is insufficient information to demonstrate that the indicative preferred sites on the policies map will be effective to deliver the required growth.

⁴ Land Matters (June 2024) (<https://pdf.savills.com/documents/Land-Matters-Report-to-LPDF-Jun-24.pdf>)

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- 4.13. In order to ensure the plan is effective and deliverable across its plan period there must be sufficient flexibility in land supply to take account of the uncertainties arising from the range of sites. While the DoR would not disagree with the strategy being proposed by the Council it will be necessary for further sites to be allocated in order to ensure Medway's housing needs are met in full across a policy compliant plan period. In addition, the Council will need to consider how the chosen strategy could address any unmet needs that arise in neighbouring areas - including amendments to Green Belt boundaries.

Green Belt Release

- 4.14. It is clear from the R18a consultation documents that Medway lacks the sufficient available land to accommodate all its required growth within existing urban areas and upon suburban sites, this indicated that if all such sites were developed within the plan period they would only deliver a maximum of 20,840 houses, leaving a surplus of around 7,900 houses to be found on sites elsewhere. As detailed within our R18a consultation response (October 2023), it is unlikely that all such sites will come forward and be developed over the plan period. It is therefore inevitable that the release should of some sites from the Green Belt will need to be considered to ensure the Council is able to meet its housing requirements.
- 4.15. The Sites are located on the edge of the existing built area, as detailed within Section 2. *Land at Pilgrims Road* site is located close to the large St Andrews development, the St Andrews Lakes recreational area and the existing housing along Pilgrims Road. The *Land at Vicarage Road* site has a strong relationship with the existing settlement, with residential development on its southern and eastern sides.
- 4.16. The Government attaches great importance to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF (December 2023) identifies that the essential characteristics of the Green Belt are their openness and their permanence (paragraph 142).
- 4.17. Paragraph 143 of the NPPF details that the Green Belt serves five purposes, as listed below;
- a) to check the unrestricted sprawl of large built-up areas;*
 - b) to prevent neighbouring towns merging into one another;*
 - c) to assist in safeguarding the countryside from encroachment;*
 - d) to preserve the setting and special character of historic towns; and*
 - e) to assist in urban regeneration*
- 4.18. The draft NPPF (July 2024) details a presumption to alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing, commercial or other development through other means.

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- 4.19. The draft NPPF introduces the 'Grey Belt' defined as *"land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes"*.
- 4.20. The accompanying Written Ministerial Statement (30th July 2024) (**WMS**) provides further guidance: *"large areas of the Green Belt have little ecological value and are inaccessible to the public. Much of this area is better described as 'grey belt': land on the edge of existing settlements or roads, and with little aesthetic or environmental value"*.
- 4.21. The WMS details a requirement for local authorities to review their Green Belt boundaries where they cannot meet their identified housing, commercial or other development needs. It proposes a strategic sequential led approach, with authorities asked to give consideration first to brownfield land, before moving onto grey belt sites and then to higher performing Green Belt land.
- 4.22. The Green Belt in Medway is identified as providing a strategic gap between Stood and Higham and Snodland and Halling, as per the first strategic purpose (Paragraph 5.49). The release of the 2 Sites within the ownership of the DoR will not undermine the purposes of the Green Belt as identified within paragraph 143 or result in the merger of Snodland and Halling. Furthermore, the Site at Vicarage Road would fall within working definition of Grey Belt by virtue of its location outside of the Kent Downs AONB and limited contribution to the five Green Belt Purposes.
- 4.23. Paragraph 142 of the NPPF details;
- "Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport."*
- 4.24. The overall approach of the Regulation 18 Medway Local Plan is considered to be in accordance with Paragraph 142 of the NPPF.
- 4.25. It is also important to consider in the context of Paragraph 142 of the NPPF, that both DoR Sites are within close proximity to Halling Railway Station. A bus stop is located on Vicarage Road opposite the land owned by the DoR. The 151 bus provides also provides regular services from Halling towards Chatham and Strood, and in this context the Sites can be considered to be Sustainably located.
- 4.26. The provision of a modest amount of new residential development upon the Sites will also help the village to reach a point where a larger population helps to support a greater level of local shops and services, which is encouraged by paragraph 83 of the NPPF, as one of the benefits of rural housing.
- 4.27. The release of the Sites from the Green Belt for residential development will secure a number of additional benefits, including, but not limited to;
- An opportunity to deliver housing to enable Medway to meet its Housing Targets;

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- Potential for Ecological and Biodiversity enhancements;
- Potential for the provision of Public Open space to serve the site, and the wider local area.

Consultation Questions

- 4.28. The following section is divided into the Local Plan Chapters and relevant consultation questions, providing answers to relevant consultation questions and observations on the draft policies.

Natural Environment

1: The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach, and what standards would be appropriate?

- 4.29. Higher standards beyond National policy / regulations is unreasonable and should Medway take this approach it should be sufficiently evidenced and justified. Chapter 14 of the NPPF outlines existing high expectations expected of applicants. Higher standards will introduce uncertainty, make the delivery of development more expensive and subsequently may deter investment.

2: Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view?

- 4.30. 10% BNG is in line with DEFRA metric. The DoR consider the requirements for new development to deliver a higher level of BNG to be unjustified. The latest Planning Practice Guidance (Reference ID: 74-006-20240214) of the Government's BNG guidance states:

"... plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented".

- 4.31. It is important to note that the Government's position is that local plans should not seek a higher requirement. To implement a higher level of BNG it will be necessary for the council to show why 20% is required in Medway and why biodiversity is more under threat in Medway as a result of residential development than elsewhere in the country, and consequently why it requires a higher level of BNG to offset these concerns. At present there is no evidence to show that this is the case. Higher standards beyond 10% may make development unviable negatively impacting housing delivery and the ability of Medway to meet its housing needs.

4: Do you consider that Medway Council should identify landscapes of local value as an additional designation in the new Local Plan. What should be the criteria for designation? Are there areas that you would identify as justifying a local valued landscape designation – where and why?

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4.32. The land to the west of the main urban area is already subject to the statutory Kent Downs National Landscape designation, while other land within the borough is subject to other existing statutory designations including Special Protection Areas, Local Nature Reserves and Local Wildlife Sites. The extent of these designations is set out within Plan 4 of the Green and Blue Infrastructure Framework document (June 2024).

4.33. On the basis of the extent of these existing designations, the DoR do not consider that Medway should introduce a further landscape designation within the new Local Plan. Proposed Policy S4 directs development towards areas of lower landscape sensitivity and provides protection of the undeveloped coast, with the Landscape Assessment prepared by LUC providing guidance on this.

5: Do you agree that the Council should promote Natural England's Green Infrastructure Framework standards in the Medway Local Plan policy?

4.34. **Yes** – Will help deliver improved much needed Green Infrastructure within Medway.

6: Has the draft Medway Green and Blue Infrastructure Framework identified the correct key issues and assets, and provide effective guidance for strengthening Medway's green infrastructure?

4.35. The Green and Blue Infrastructure Framework (June 2024) identifies a wide range of Green Infrastructure provision within Medway. The DoR Sites are located within easy access to the Green and Blue Infrastructure provisions detailed within the framework including St Andrew's Lake and publicly accessible Ancient Woodland within the Kent Downs AONB.

7: Do you consider the Green Belt boundary should be revised in line with the recommendations in the 2018 Green Belt Assessment?

4.36. The Medway Green Belt Review (December 2018) (**GBR**) divides the Metropolitan Green Belt within Medway into 5 large assessment areas. The DoR Sites at Halling are located within parcel 5. Whilst the GBR considers parcel 5 as a whole to meet the objectives of the Green Belt it does not provide an assessment at a more detailed level and should therefore be revisited and updated to evidentially assess the Green Belt at a more local level. Further consideration and review will also be required in relation to sites that meet the Grey Belt criteria in line with WMS⁵.

8: Do you consider that exceptional circumstances exist to justify review of the Green Belt boundary?

4.37. **Yes** - Key to the soundness of the plan, is that the Council must ensure that it meets its identified housing needs in full determined by national policy.

⁵https://assets.publishing.service.gov.uk/media/66aa4849ab418ab055593105/Letter_from_DPM_to_local_authorities_-_Playing_your_part_in_building_the_homes_we_need.pdf

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4.38. It is clear from the Regulation 18a consultation Medway lacks the sufficient available land to accommodate all its required growth within its existing urban and suburban core. As detailed within our R18a consultation response, it is unlikely that all the identified urban and suburban sites will come forward and be developed over the plan period. It is inevitable on this basis that sites for Greenbelt Release should be considered up front within the Local Plan process to ensure that Medway is able to meet its statutory Housing requirements.

4.39. The SA appraisal also identifies an unmet need of C2000 homes within the neighbouring authority of Gravesham, which all or some may need to be accommodated within Medway under the Duty to Co-operate.

Policy S7: Green Belt

4.40. **Object** - Policy S7 fails to recognise that limited Green Belt release will likely be required, particularly on the edges of existing settlements. We would recommend the changes set out below. The policy will also need to be reviewed against provisions in any new NPPF (e.g. in relation to Grey Belt).

Policy S7: Green Belt

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

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

Limited infilling within or adjacent to existing settlements, as designated on the Policies Map, may also be appropriate where it can be demonstrated that the site should be considered to be within the village and would not undermine the functions of the Green Belt

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

37: What are examples of healthy development in Medway you would like to see more or less of?

4.41. Increased provision of decent and affordable homes within an attractive environment. The DoR Sites at Halling can help deliver upon this aim.

38: Of those health areas listed, what are the most important for the local plan to address?

4.42. Provision of decent and affordable homes within an attractive environment. The DoR Sites at Halling can help deliver upon this aim.

5. Conclusion

- 5.1. These representations have been prepared on behalf of the DoR in response to the overall objectives of the Emerging Regulation 18 Local Plan, specifically regarding the sites at Pilgrims Road and Vicarage Road, Halling.
- 5.2. This representation has reviewed various aspects of the emerging District Plan, highlighting comments, concerns, and objections. While not all elements of the plan have been addressed, further input may be provided on any aspects of the District Plan in future consultation phases if deemed necessary.
- 5.3. It is clear that the primary aim of the Medway Regulation 18 document is to achieve sustainable development, a goal that the DoR fully supports. Observations have been made regarding the proposed growth strategies, with an understanding that the Council may require a combination of these strategies. However, the potential release of Green Belt land requires further exploration in accordance with the 30th July Written Ministerial Statement⁶ to ensure that Medway meets its objectively assessed housing needs and provides the high-quality housing necessary for the local community.
- 5.4. The DoR expresses gratitude to Medway Council for the opportunity to provide input on the Regulation 18 Local Plan. We reserve the right to offer further comments on any subsequent consultations and the associated evidence as needed.

⁶https://assets.publishing.service.gov.uk/media/66aa4849ab418ab055593105/Letter_from_DPM_to_local_authorities_-_Playing_your_part_in_building_the_homes_we_need.pdf

Planning Service
Culture and Community
Regeneration, Culture & Environment
Transformation,
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

4th September 2024

Dear Sir/Madam

MEDWAY LOCAL PLAN REGULATION 18 CONSULTATION 2024

VINEYARD FARMS LTD

On behalf of our client, Vineyard Farms Ltd, please find enclosed representations to Medway Council's Local Plan Regulation 18 Consultation. The online consultation form has been completed, however our full response to the draft Local Plan policies is outlined within this letter. This letter supports and supplements the comments made in the Council's online form.

The decision to bring forward a new Local Plan is supported as the importance of creating an up-to-date Plan led approach to future planning for development cannot be understated.

The Council's adopted Local Plan comprises the Medway Local Plan adopted in May 2003. The Local Plan is out of date and significantly pre-dates the adopted December 2023 National Planning Policy Framework (the Framework). As such, a number of significant planning legislative changes have occurred since the Local Plan's adoption, including various changes to the Framework. In that regard, Government is also currently seeking views on the proposed further revisions to the Framework and other changes to the planning system until 24th September 2024. Those proposed revisions are aimed at further encouraging new development growth, capturing investment, and job creation.

In this context, we support the Council in its continued work to bring forward an up-to-date Local Plan. A new Local Plan is required to ensure the future needs of residents and businesses in the Borough can be met through the sustainable development of sites, and the diversification of industries to create jobs and generate economic well-being.

Introduction and Background

Our client, Vineyard Farms is a major producer of English wine. A product which is grown, harvested and sold in the United Kingdom and which generates jobs and training opportunities in Medway. The business, like many agricultural businesses in located in the Kent Down National Landscape ('KDNL'), Agricultural

business and production was located in the AONB long before the concept of the KDNL as a policy was conceived. The KDNL is a living, working, food-producing environment. It is not a landscape museum.

Vineyard Farms is a modern English success story, it creates one of the world's finest (award-winning) products here in Medway. The business wants to kick-start a wine revolution in England – with Medway at the centre. The vision is to produce English sparkling wine, which is accessible to everyone, whilst replicating the highest-quality standards of European alternatives. In doing so, reducing the need to import products and reducing carbon and transport impacts on the environment. Creating jobs here in Medway and training for younger people in Kent. Will the Council support this?

Traditionally, over 90% of sparkling wine consumed in the UK is imported from France, Italy, or Spain. However, that is changing due to the sustained quality of English wines and the fact that southern Europe and western United States of America is increasingly suffering from extreme temperatures over many weeks each year, affecting grape yield and composition. Southern England now finds itself increasingly in the sweet-spot of a climate which is perfectly suited for vine growing and grape production.

Vineyard Farms want to optimise this window of high-quality production by constructing a winery building including a café/restaurant and visitor centre, which we refer to as the 'Silverhand Winery'.

The entirety of the Vineyard Estate production area lies within the Kent Downs National Landscape (KDNL) designation. The wider KDNL designation covers **878 square kilometres** washing over countless settlements, roads, railways, thousands of businesses, and infrastructure sites.

The proposed Silverhand Winery is not a whim or merely a vanity project by the Applicant. It represents a significant economic and financial investment by a major investor and local employer who produces award-winning English wines here in rural Kent. Employment opportunities are full-time and represent good employment opportunities for local people.



Inset: The Extent of the Kent Downs National Landscape (AONB)

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We set out our representations to each of the relevant policies of the Local Plan below:

2.3 – Spatial Development Strategy

The borough's rural economy is a major sector both in terms of creating and servicing direct jobs and its role in the borough's tourism offer. The Council need to identify within its Spatial Development Strategy the important role the rural sector industries perform in Medway. In relation to our client, wine production, albeit an agricultural process, is also a source of significant investment, job creation, and leisure and tourism. Agricultural-related industries are an intrinsic part of the Kent countryside and vine growing and wine production forms a key part in shaping the character and appearance of the landscape in the KDNL.

Draft Policy S1: Planning for Climate Change

Supporting a healthy local economy and support for local rural businesses will actively help to reduce the impacts on climate change. Specifically, rural businesses which thrive and produce goods and services locally within Medway will help reduce the need for, and reliance on, imported goods. The Council should stress the importance of reducing the imports of goods within Policy S1 and how this can have considerable carbon benefits by reducing carbon emission levels. As such, the Council must play a part in reducing the imports of goods and instead strongly support the expansion and diversification of local businesses.

In this regard, Vineyard Farm's Estate is farmed organically. Employees are sourced locally, as are apprenticeships, through local colleges. The business is fully committed to delivering a carbon net zero operation, to use water efficiently, and to encourage local biodiversity in the immediate area and its local surroundings. However, if planning policies do not allow for managed growth and diversification the business may need to examine alternative solutions resulting in a dispersed product chain, greater transport impacts, more travel for employees, and greater use of natural resources and carbon emissions.

We therefore propose a revision to draft Policy S1 as follows:

'Mitigating the impacts of climate change'

Additional bullet point

- **Supporting local businesses and producers in Medway, in order to reduce the need to import goods.**

Draft Policy S6: Kent Downs Area of Outstanding Natural Beauty and National Landscape

We object to draft Policy S6 as drafted.

The Kent Downs National Landscape (KDNL) designation, which as a wider designation, covers 878 square kilometres washing over countless settlements, and major infrastructure networks, can be a significant challenge to the growth and diversification of rural businesses which are established within the designated area.

For example, vineyards and wine production is an intrinsic part of the Kent and Medway countryside and it plays an important role in shaping the character and appearance of the landscape in Medway. The Council needs to acknowledge this fact, and outline within draft Policy S6 that agriculture, viticulture, and tourism play an important role in shaping the landscape beauty in the Kent Downs AONB. It is also important that the emerging Local Plan acknowledges the role that rural industries play in delivering food production, providing jobs and investment for rural communities in Medway.

In this context, we consider that draft Policy S6, as drafted, is too restrictive and needs amending.

Firstly, the draft Policy states that, 'Development in the National Landscape, and within its setting, must demonstrate that it meets the aims of the Kent Downs AONB National Landscape Management Plan and associated supported relevant policy guidance'.

This draft wording effectively makes the Landscape Management Plan the principal document (kingpin) of the development plan and reduces the emerging Local Plan to a secondary policy document. What happens where a development proposal does not entirely meet the aims of the Management Plan but meets the aims of the Local Plan, when read as a whole?

Additionally, the draft Policy S6 requires developments to 'conserve and enhance the special qualities of the National Landscape...'

This policy wording requires not only that a development proposal does not cause harm, but that it actually *enhances* the designated landscape i.e. it must do more than retain the status quo through mitigation. This is almost impossible to achieve.

We therefore propose a revision to draft Policy S6 as follows:

Development in the National Landscape, and within its setting, must demonstrate that it ~~meets~~ **has had regard to meeting** the aims of the Kent Downs AONB National Landscape Management Plan and associated supported relevant policy guidance'

Other development within the National Landscape and its setting, both in views to and from the designated landscape, will be permitted provided that:

- a. the location, form, scale, materials and design would conserve ~~and~~ **or** enhance the character of the landscape;
- b. the development would conserve ~~and~~ **or** enhance the special qualities, distinctive character and tranquillity of the National Landscape and avoids adverse impacts, unless these can be satisfactorily mitigated; and
- c. the development ~~further~~ **has regard to** the delivery of the Kent Downs AONB National Landscape Management Plan and having regard to any associated guidance.

Draft Policy T1: Promoting High Quality Design

We support draft Policy T1 and the need for new development in Medway to incorporate high-quality design that makes a positive contribution and responds appropriately to the character and appearance of its surroundings.

High quality design can also help ease concerns relating to new development and investment in the KDNL (see draft Policy S6).

Draft Policy T13: Tourism, Culture and Visitor Accommodation

We generally support draft Policy T13 and the need to promote and support tourism development where it; contributes to the local economy, enhances Medway's cultural life, and meets sustainable development principles.

However, we believe the Council can be even clearer, and go a little further, in its support for tourism and leisure within draft Policy T13. At present as drafted, the policy only refers to the provision of tourist accommodation but it fails to mention visitor destinations or attractions (which are part of the reason for tourists to stay overnight in the borough).

We therefore propose a revision to draft Policy T13 as follows:

Sixth paragraph

The Council will support the retention, enhancement, and provision of visitor accommodation **and visitor attractions**, where it contributes to the sustainable development of Medway's tourism, cultural and visitor economy. Proposals will be assessed against the principles set out below.'

Draft Policy T14: Rural Economy

We generally support Policy TP14 and the need to secure sustainable growth and service provision in rural communities. However, we **object** to the Policy and accompanying text as currently drafted.

Paragraph 7.9.5 as drafted notes that the 'growth and diversification of farming and horticultural activities may require supporting infrastructure'. We suggest the Council add in the importance of viticulture in the rural economy, as agriculture related industries are an important part of the rural economy.

We therefore propose a revision to draft supporting text as follows:

7.9.5 'Growth and diversification of farming, **and** horticultural, **and viticulture** activities may require supporting infrastructure, such as processing, packing and production facilities, within areas such as the Hoo Peninsula.'

Additionally, in the wording of draft Policy T14 itself, we note the criteria for determining employment-generating development proposal in the countryside. We consider the fourth bullet point within draft Policy T14 to be superfluous, overly restrictive, and unattainable for any development proposal to not conflict with any other policy in the emerging Local Plan. In this regard, development proposals should generally accord with a Local Plan 'when read as a whole'.

We therefore propose a revision to draft Policy T14 as follows:

Delete the draft fourth bullet point

- ~~Proposals do not conflict with other policies in this plan.~~

Summary and Conclusion

The principle of bringing forward an up-to-date Local Plan is strongly supported.

A new Local Plan for Medway is required to ensure the future needs of residents and businesses in the borough can be met through the sustainable new development and diversification of sites to ensure that the borough continues to be a thriving and diverse place, which offers opportunities for residents, businesses, and visitors alike.

Vineyard Farms Ltd would welcome the opportunity to work with the Council to bring forward their proposed Silverhand Winery within the Kent Downs National Landscape (AONB). The business is ready to invest heavily in the borough and to create full time job opportunities and apprenticeships in the borough at Cuxton, but it needs the help and support of the Council's policy framework to deliver this vision.

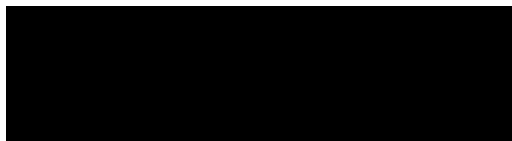
The new Local Plan must therefore consider the importance of agricultural, including wine production, in the borough, and the important role that established vineyards play in shaping the character and appearance of the Kent countryside, including the National Landscape.

Wine production delivers major investment into Medway borough. This rural industry creates long-term full-time jobs and training opportunities, and it encourages tourism. The wine producing industry plays a major role in the health and well-being of the local economy.

Additionally, English wine producers are now amongst the very best (award-winning) in the world, and much of the industry is based in Medway – the industry needs the Council to acknowledge this fact and help this sector with supportive planning policies so that rural businesses can grow sustainable and invest in this borough.

We trust our comments and proposed revisions are clear. I would be grateful if you could confirm receipt of these representations and keep me informed of the progress of the emerging new Local Plan.

Yours faithfully,



Philip Scott
Group Partner



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

4th September 2024

Dear Sir,

Medway Local Plan 2041 Regulation 18 consultation, July 2024

Peter Court Associates have again been instructed by the owners of Port Medway Marina, namely Messrs. David and Neil Taylor, to submit appropriate representations on this new draft Regulation 18 consultation document. This is the latest in a series of representations on behalf of my clients, comprising your Issues and Options Consultation Document in February 2016, the Development Options Consultation Report of January 2017 and the Local Plan 2012-2035 Regulation consultation that was submitted to you on 2nd May 2018.

When making those previous submissions I explained the nature of my clients' business and their intentions. I did so as I considered it appropriate to set out the context in which the submissions were being made.

It is my clients' intentions to submit a planning application for their proposed developments at Port Medway Marina. Nevertheless, in doing so, it will be appropriate to demonstrate that they have also recognised that Medway Council has been progressing a new local plan and that they have therefore taken the opportunities to set out their responses to draft policies and other questions posed in those consultation documents.

Your latest Regulation 18 consultation seeks responses to a lengthy series of questions and also provides opportunities to comment on a range of policies. This submission on behalf of my clients therefore focusses on those questions and policies that are relevant to Port Medway Marina

Spatial development strategy

The spatial development strategy begins by explaining that it will deliver sustainable development in Medway up to 2041. Unfortunately, however, it does not go on to say what this will mean in terms of the number of dwellings it proposes to provide and how they will be phased over the plan period and where precisely, they will be. Moreover, there is no commitment to meet the forecast housing and other requirements of Medway. It is therefore hoped that this information will be clearly set out in the Regulation 19 Pre-Submission Draft Plan.

The statement that the development strategy for Medway prioritises regeneration, making the best use of previously developed land and directing investment to urban waterfront and centre opportunity areas is supported. The proposals for Port Medway Marina fully accord with this, as they will be making use of previously developed land on the waterfront at Cuxton. Whilst this lies adjacent to Strood, which comprises the start of the urban waterfront programme, it is not technically within this overall strategy area. It is therefore requested that the Council will support my clients' development proposals and identifies the site within the next version of the draft local plan.

The Council then sets out three spatial growth options, namely SGO1: Urban Focus; SGO2: Dispersed Growth and SGO3: Blended Strategy. SGO1 seeks to maximise urban centres and waterfront sites. Given that PMM comprises a waterfront site, then this strategy is obviously supported. SGO3 is also supported in that it too comprises a brownfield focus with regeneration in waterfront locations. It is, moreover, acknowledged that such developments should reflect design guidance and heritage constraints. In this respect, my clients have already had several meetings

with the Council's urban design officers as well as planning officers. Indeed, their advice has been helpful and is being taken into account in the preparation of the planning application.

Policy S1: Planning for Climate Change

Whilst it is understandable that the Council should encourage developers and, indeed, everyone, to do what they can to address the impacts of climate change, its approach to this needs to be reasonable and acceptable. In these circumstances, the wording of the second paragraph of this draft policy should say "Development should aim to reduce the impact and mitigate the likely effects of climate change on existing and future communities and the environment and aim to reduce the use of natural resources."

Response to Question 1: The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach and what standards would be appropriate?

The Council should accord with national standards rather than set their own. Otherwise, developers will be faced with an array of changing and inconsistent standards that will result in confusion and delay.

Question 2: Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view?

This is again an issue similar to that of Question 1. In response, my clients would wish to make it clear that any provision for BNG over the 10% threshold should be directed to local Medway Council or Wildlife Trust sites where they will benefit biodiversity enhancement on sites with a guaranteed long- term future.

Policy T1: Promoting High Quality Design

It is considered that the final bullet point of this draft policy is unnecessary, as it is not at all clear what additional benefit will be achieved from meeting the criteria. It should therefore be deleted.

Policy DM6: Sustainable Design and Construction

It is unreasonable for the Council to require developers for design principles to be founded on locally sourced and/or recycled materials as set out in the third bullet point. Instead, a more flexible approach is required in case this requirement cannot realistically be met.

The final bullet point is also unreasonable as it appears to overlap with Part R of the Building Regulations. Moreover, the provision of high-speed internet connections is a matter for infrastructure providers, not developers.

Policy T2: Housing Mix

Whilst it is acknowledged that the Council needs to provide a sufficient range of dwellings in order to meet the needs of the population, this does not mean that every site proposed for, inter alia, residential development must provide a specified range of dwellings. Instead, the opportunities and limitations provided by each site should be considered in accordance with its specific location and characteristics. This is particularly the case in respect of Port Medway Marina, where flats are far more appropriate than houses of various types and sizes.

Response to Question 10: Do you think that this policy provides effective guidance on the required housing mix in Medway?

The crucial word here is “guidance”. The proposed policy provides a basis for discussion when development proposals are being worked-up and considered by and with the Council. There is clearly a need for flexibility, depending on varying circumstances, hence “guidance” is the appropriate word.

Policy T3: Affordable Housing

The Council is correct in recognising that sites have differing abilities to provide affordable housing. In this context, greenfield land generally has a greater ability to provide affordable housing than brownfield land. A 10% figure is therefore an appropriate basis for discussion when proposals are submitted and/or discussed in respect of brownfield sites. Furthermore, there may well be the need for flexibility when discussing the tenure mix. Indeed, the Council itself may wish to seek a variation in what it currently proposes.

Due to the need for flexibility, depending on particular circumstances, the policy should be re-worded so as to state that affordable housing will be sought on sites of 10 units or over.

Question 11: Do you agree with having a 10% requirement for affordable housing on urban brownfield sites and 30% requirement for affordable housing on greenfield sites and higher value urban locations? What do you consider would represent an effective alternative approach? Do you agree with a varied approach for affordable housing requirements based on the different value areas across Medway?

The 10%/30% approach is reasonable. However, there is a need for flexibility, depending on particular circumstances.

Question 12: What do you consider would represent an effective split of tenures between social/affordable rent and intermediate/low- cost home ownership housing in delivering affordable housing?

These matters need to be discussed and agreed on a site- by- site basis and take account of current and changing forecast requirements.

Question 13: Do you have any views on the delivery of affordable housing and the cascade principle? What evidence can you provide to support your views.

There are two points to be made here. First of all, it is often difficult for Housing Associations to want to take on relatively small developments/groups of affordable dwellings. What therefore happens when no Housing Association is interested in acquiring the proposed dwellings? Secondly, the provision of affordable housing needs to be reasonably phased, rather than required at the very outset of the development.

Policy T20: Riverside Path

The Council is right to recognise that the river represents an important transport corridor for commercial and leisure traffic. It is therefore appropriate that it should consider the provision of walking and cycling facilities along with public open space wherever that may be feasible. However, it is difficult for an applicant to demonstrate “the highest design standards”, given that these are clearly subjective. Instead, the Council should seek and work with landowners/developers to produce designs and layouts that are acceptable.

Policy T22: Marinas and Moorings

The proposed policy for upgrading marina facilities is very much welcomed by the owners of Port Medway Marina. Indeed, the policy may well have been drafted with PMM in mind. As has been made clear in previous responses to the Council’s draft planning documents and at pre-application discussions and presentations to councillors, they have assiduously invested in Port Medway Marina over a period of more than 30 years, when they first acquired what was then a run down, almost derelict marina. Indeed, what they have done over that period clearly shows how much they have invested and achieved. Indeed, it is a huge credit to them. Their latest development proposals, which have been subject to detailed consideration by the Council for several years, comprise the next and important step in this process.

Policy DM21: New open space and playing pitches

The provision of these facilities should be considered on a site-by-site basis that takes into account the existing situation and realistic opportunities. A degree of flexibility is therefore required, which should be reflected in the wording of the policy.

It is hoped that these submissions are helpful and will be taken into account when the Council decides what changes need to be made when producing the next draft of its local plan -and when considering the forthcoming planning application at Port Medway Marina.

Yours faithfully,

A black rectangular redaction box covers the signature of Peter Court. A small horizontal line extends from the right side of the box.

Peter Court
Director

cc. Messrs D and N Taylor, Port Medway Marina
cc Mr. T. La Dell

04 September 2024
L240904 SAV Reg 18 Consultation Reps



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SUBMITTED VIA EMAIL: futuremedway@medway.gov.uk

Dear Sir or Madam

MEDWAY LOCAL PLAN 2041: REGULATION 18 CONSULTATION – JULY 2024 REPRESENTATIONS SUBMITTED ON BEHALF OF BLUEBERRY HOMES

Introduction

We write on behalf of our client, Blueberry Homes, to submit formal representations to the Medway Local Plan 2041: Regulation 18 – July 2024 (the '**Consultation**').

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

Blueberry Homes wants to make long term, capital investment within the Borough to assist in bringing forward the transformation of this waterfront site for high quality mixed-use development which in turn will help meet the strategic policy objectives of the Council. The Site will assist in meeting the identified need for housing, and other uses, within the Borough. Our client therefore has an interest in the appropriate formulation of policy within the new Local Plan, in order to ensure that it can be found 'sound'.

This correspondence therefore provides our client's representations to the current consultation in order to assist the production of the new Local Plan. Our client wishes to continue working proactively and positively with the Council and would welcome the opportunity to meet with Officers in order to discuss the enclosed comments in more detail, should that be of assistance.

Whilst our client generally supports the overall aims of the Consultation, there are a number of comments and objections to specific parts of individual policies, which are set out in this letter below. These objections can be easily remedied by amendments as detailed in this letter. We have also submitted these representations through the online portal alongside this letter, in relation to specific policies.

The Site

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

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

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

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

Our client's aspirations for the Site are evolving but at this stage and as discussed with the LPA, our client considers that the Site has the potential to accommodate the following:

- Approximately 500+ homes;
- Relocation of the SGN compound;
- An assisted living / care home / retirement accommodation;
- Commercial uses including a foodstore and a range of flexible commercial units; and
- Reprovision of a clubhouse for the Sailing Club.

We comment on the potential of the Site in more detail below, specifically the irregular boundary of the Site within the accompanying draft policies map as a 'Indicative Preferred Site – Resi-led' as part of these representations.

Representations

We provided representations on behalf of our client, to the previous consultation 'Medway Local Plan Review: Regulation 18 Consultation – Setting the Direction for Medway 2040' in October 2023. The representations were supportive of the overall vision for the Borough and considered that the Site should be allocated within the future Local Plan.

These representations continue the overall support for the Vision however additional responses and comments have been provided in response to the indicative preferred site allocation, preferred Spatial Growth Options and specific policies. These comments have been prepared to assist the LPA's preparation of its draft Local Plan, including its evidence base and policy wording, to ensure that when prepared the Plan can ultimately be found 'sound', and fully recognise that further Regulation 19 consultation will be undertaken in due course. We do however consider that the matters raised can be fully addressed now.

Vision & Spatial Development Strategy

Our client supports the Council's starting point of regeneration and making the best use of vacant or underutilised brownfield land in accordance with the NPPF. The proposed development of the Site would accurately reflect and support the aims of the blended strategy approach being a brownfield site in an accessible location capable of supporting high density mixed-use development.

In relation to the 'Vision for Medway in 2041', the urban waterfront is identified as a key component of the character of Medway. The Vision recognises that there are opportunities for improved accessibility through riverside paths and connections. Whilst our client supports the Vision, specifically urban regeneration along the waterfront, there are potential constraints regarding the delivery of continued paths and connections which should be acknowledged and flexibility allowed for within the emerging Local Plan policies.

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

Whilst our client generally supports the overall Vision, we provide further detail below in relation to specific detailed policies within these representations to ensure that policies are formulated appropriately and support the delivery of regeneration sites within the Borough.

Spatial Growth Options

The Consultation sets out three options for locating development across Medway, which comprise of i) Urban Focus, ii) Dispersed Growth and iii) Blended Strategy. Our client recognises that both Options i) and iii) include the Site as a 'preferred indicative site allocation' as part of the strategy to deliver new development under these options, which reflects the significant contribution that the Site can make to delivering the significant housing growth required across the Plan period.

The Plan then identifies the Blended Strategy as being the indicative referred approach, which our client supports.

We note that the Site is identified within the Policies Map as an 'Indicative Preferred Site – Resi-led' which we are supportive of in principle. Whilst we acknowledge that the policy map is indicative at this stage, the boundary is irregular and excludes a parcel of the Site to the north west. The boundary should be updated to include the whole of the Site and accurately reflect the site boundary as shown in the enclosed site plan (Drawing Ref: 17286-011). At this stage, we recognise there is not a site specific allocation however we comment on the identification of the Site within the Sustainability Appraisal below. We would wish to discuss and agree the content of any site specific allocation policies as they progress through the Emerging Local Plan with officers.

The Spatial Development Strategy (the '**Strategy**') supports the Council's commitment to achieve a net zero carbon Medway. The Strategy priorities regeneration and directs investment to urban waterfront opportunity areas. Our client is supportive of the strategy in principle however, we comment further on how this is intended to be delivered through specific policies below.

Sustainability Appraisal (Site GN6)

Within the Interim Sustainability Appraisal (Volume 1 of 2: Main Report) June 2024 (the '**Sustainability Appraisal**'), the Site is identified as having a housing capacity of 200 dwellings. The Site was also identified within the Land Availability Assessment ('**LAA**') Interim Report as having the capacity to deliver 200 homes.

It is understood that 200 dwellings is an approximate figure within the Sustainability Appraisal and the LAA. The figure is based on a desk based analysis of the Site rather than an understanding of the realities of the Site and relevant opportunities and constraints. The constraints include high levels of contamination and remediation required (as the Site is a former gas works), a failing sea wall and the existing gas works easement which runs through the Site.

The Site also presents opportunities for higher densities such as the waterfront to the north and the precedent of Victory Pier to the west. The Site is located as such that the principle of taller buildings is acceptable and therefore the Site is capable of delivering more than the initially anticipated 200 dwellings.

Since the previous representations were submitted in October 2023, our client has progressed the indicative proposals for the Site. The proposals are currently subject to pre-application discussions with Officers. Following meetings with officers and a written response, the LPA support the principle of development at the Site.

Although the proposals are indicative at this stage, the pre-application enquiry demonstrates that the Site has the potential to achieve a greater number of homes than detailed within the Sustainability Appraisal and LAA. The proposed density for the Site is established as being acceptable in principle through the pre-application process. However, we fully recognise that acceptability of 500 dwellings is subject to further work in relation to matters including technical, design, environmental and amenity considerations.

Our client continues to support the inclusion of the Site within the Regulation 18 Consultation (July 2024) and requests that the Site be formally allocated for future development for the range of uses as set out above, within the future Local Plan.

Specific Policies (Sections 4 to 13)

We provide our representations to specific policies within the subheadings below.

Section 4 – Natural Environment

Policy S5 – Securing Strong Green and Blue Infrastructure

Our client generally supports the approach set out in this policy. However, the requirements for a ‘Green Infrastructure Plan’ for all major new development proposals is currently vague. We recommend that the Policy provides further clarity on the requirements and how the Green Infrastructure Plan and its content is required to meet policy objectives.

Our client supports the Policy approach in seeking opportunities for promoting and enhancing links, paths and networks, specifically to extend appropriate access along the riverside. However, it is important that the Plan recognises that continuous access may not also be within the control of developers / landowners.

We recommend that the Policy provides or directs applicants towards additional guidance relating to a ‘Green Infrastructure Plan’ which provides further detail in order to understand what is required to support an application. We also recommend that the Policy be clear in promoting the links and paths whilst understanding that third party ownership outside of the control of developers and landowners can limit fully implementing routes. However, the Policy could allow for the ‘facilitation of links’ or similar wording to ensure applicants consider future possibilities for connectivity to adjacent sites as and when they come forward for future development.

The Policy in its current form does not allow for flexibility to ensure that although aspirational, is also deliverable. The Policy therefore does not accord with paragraph 16(b) of the NPPF and is not considered to be effective.

Policy DM1 – Flood and Water Management

Whilst our client generally supports the approach in Policy DM1, the requirement to ‘*replicate Greenfield runoff rates and volumes*’ for all developments is considered too wide ranging and unachievable for certain developments.

There are locations within Medway which would usually be permitted to discharge at an ‘uncontrolled’ rate with any storage being provided for times when tidal levels would drown out any outfall. The approach to greenfield rates set out within the policy does not align with the general approach set out within the NPPF. We request clarity on when the requirement to replicate greenfield runoff rates and volumes will be applied in relation to different scale and locations of development. The specific requirement for all development to provide this would place an unnecessary and disproportionate burden on such development proposals as set out above, and therefore requires clarity.

We object to the Policy in its current form as it conflicts with paragraph 170 of the NPPF. However this can be easily rectified by including wording such as ‘*where possible*’, as it does in the NPPF.

Section 5 – Built Environment

Policy T1 – Promoting High Quality Design

Our client generally supports the overall approach and objective of this Policy. However, the Policy currently states ‘*it must be compliant with the building heights / views policy...*’ of which there is no reference to. There is no policy within the Consultation which refers to ‘building heights / views’ and as such we cannot comment on the content of such a Policy at this time. We wish to be made aware of a specific emerging policy in relation to this and any reference to such policy within Policy T1 should make specific reference to it. We reserve the

right to make further comment when the details of such a policy is published. If not then the current Policy should remove reference to it.

Policy T1 also states that proposals should make efficient use of land. Whilst our client supports this approach, it should also set out that development will be supported where this is achieved through higher densities where appropriate. The Policy should include reference to '*densities should be maximised where possible*', in line with Paragraph 128 of the NPPF.

Whilst our client does not object to this Policy, it is recommended that clarity be provided as set out above.

Section 6 - Housing

Policy T2 – Housing Mix

Our client generally supports this Policy. However, we note that the final sentence does not recognise that custom and self-build plots would not be an option for all types of residential development. It should be recognised within the Policy that not all development types would need to consider this where it is not appropriate, for example, within apartment developments.

Our client does not object to this Policy but it is recommended that the Policy be clear that not all development types will be able to consider custom and self-build options.

Policy T3 – Affordable Housing

Whilst our client generally supports Policy T3, the affordable housing requirement (30% in high value areas and 10% in lower value areas) should be clearly defined on a map within the Local Plan.

Policy T4 – Supported Housing, Nursing Homes and Older Persons Accommodation

Our client generally supports the overall approach and objective of the Policy. However, the Policy requires applications to demonstrate that the proposal meets a proven need for the particular type of accommodation. The Policy and / or the supporting text should provide further clarity in terms of the format which this will be required for an application.

Section 7 – Economic Development

Policy S10 – Economic Strategy

Whilst our client generally supports this Policy, clarification / confirmation of what the '*key regeneration opportunity areas*' are as referenced within the text, should be provided.

The Policy should also provide support for small scale job generating uses which are part of residential / mixed-use scheme. The importance of small scale job generating uses within major developments should be recognised as making a positive contribution to the overall economic strategy of the Plan.

Section 8 – Retail and Town Centres

Policy S15 – Town Centres Strategy

Our client generally supports this Policy, however, as with Policy S10 there should be recognition had to the positive contribution small scale retail and service uses can make in serving communities outside of the defined centres or larger scale development schemes. The Policy should therefore specifically provide wording which supports small scale retail and service uses as part of major residential or mixed-use schemes.

Policy T15 – Sequential Assessment

Whilst our client has no concerns with the inclusion of a sequential test policy, which of course is a requirement under the NPPF, much of this policy duplicates the NPPF. Therefore we recommend that the policy is reworded to simply require a sequential assessment to be undertaken in accordance with national policy and guidance, removing those elements that are duplicated in order to comply with NPPF paragraph 16(f).

Our client is however concerned that the policy also introduces a requirement to demonstrate trade draw of a proposal, in order to inform the sequential test. It should be recognised that trade draw forms part of a quantitative retail impact assessment, but the policy effectively seeks to introduce this requirement into the sequential test. Whilst larger scale proposals will be required to do so because they exceed the impact assessment thresholds, for those smaller schemes which do not require quantitative impact assessment, or for leisure uses, this is not possible nor proportionate. Therefore the policy should be reworded, to only refer to trade draw where a quantitative retail impact assessment is required under Policy T17.

The policy should also be clear that proposals would not be subject to a sequential assessment where they are classed as Ancillary Development under the terms of Policy T16, to which we provide detailed comment below.

Finally, the final paragraph refers to demonstrating sustainable travel choices under Policies DM18 and DM19. This is not relevant to a sequential assessment policy, avoids unnecessary duplication, and those policies will need to be complied with where relevant. Therefore this paragraph should be deleted.

Policy T16 – Ancillary Development

Whilst our client supports the principle of a policy that supports ancillary uses, the wording of the policy itself is confusing. In particular it requires ancillary uses to still be subject to the sequential test under Policy T16.

However, the nature of an ancillary use, for example to a wider development proposal in an out-of-centre location, is ultimately that it isn't appropriate to seek to locate it in a sequentially preferable location (e.g. in a town centre), as it would fulfil an entirely different role. This seems to be the purpose of including such a policy.

Therefore, if a particular use or proposal is ancillary to a wider development proposal or existing uses, then it either i) doesn't need to, or shouldn't be, subject to the sequential test; or conversely, ii) if a sequential assessment has been undertaken then there is no reason why it also then needs to be subject to Policy T16.

The Policy is therefore confusing as currently worded. In order for the policy to be effective, and for it to comply with NPPF paragraphs 16(d) and 16(f), it needs to be explicit that ancillary uses will not be subject to the sequential test under Policy T15, where it meets the criteria set out in Policy T16.

Policy T17 – Impact Assessment

Our client has a number of concerns with the detailed requirements of the policy, which we set out below.

a) Thresholds

We note that Criteria a) contains a range of thresholds are adopted for different locations and uses, ranging from 100 sq m for a leisure use in Strood, to 1,000 sq m for a comparison use in Chatham. We are concerned that these will lead to confusion for applicants. For example if there is a comparison goods scheme located somewhere between Chatham and Gillingham, there is no clarity as to whether a 1,000 sq m threshold or 200 sq m threshold would apply. This only leads to confusion for applicants and would not comply with NPPF paragraph 16(d).

The thresholds themselves are extremely low for convenience and leisure uses and for comparison goods outside of Chatham. For example, a commercial gym is likely to be above the highest leisure threshold of 500 sq m, but there is no realistic scenario where such a gym would ever possibly lead to anything near a significant adverse impact on a defined centre, for the health of centres themselves is underpinned by retail and service provision.

Further work is required to justify the thresholds, clarify the areas to which they relate, and ideally make them simpler and clearer for applicants to follow. We are concerned that the Council does not have an up to date Retail Study with which the floorspace within centres, their retail and leisure turnovers, health and overall vitality and viability. In the absence of such information the thresholds are not justified.

By introducing low thresholds as proposed, that in most cases will require an impact assessment in some form for a significant number of retail and leisure proposals, the Council needs to ensure that it has an up to date Retail and Leisure Study that applicants can use to base such assessments on. This is in line with the PPG requirement to draw on local information.

b) Impact assessment criteria

Criteria b) sets out the matters that are required to be considered under the impact assessment. Whilst the 2nd and 3rd bullet points effectively reiterate the NPPF paragraph. As such, additional requirements go beyond the NPPF and are therefore not consistent with it.

Notwithstanding this, it is unclear what is meant by the 1st bullet point in relation to impact on 'the strategy'. If this means the impact on the defined centres which are set out in Policy S16, then this is captured by the assessment under the 2nd and 3rd bullet points. Similarly, such an assessment will capture the impact on the health of centres, and their vulnerability, under the 4th and 5th bullet points and it is unclear what else these requirements are intended to capture. Finally we note that the 3rd bullet includes reference to 'investment supporting town centres'. It is unclear what is meant by this, as if investment is within a centre, then it is assessed under the existing, planned or committed criteria of this part of the policy. It is therefore ambiguous but also unnecessary.

Therefore the policy as currently worded contains unnecessary duplication, but also ambiguity, and is therefore not consistent with NPPF paragraphs 16(d), 16(f) and 35(d).

Other Matters

Finally, the final paragraph refers to demonstrating sustainable travel choices under Policies DM18 and DM19. This is not relevant to an impact assessment policy, avoids unnecessary duplication, and those policies will need to be complied with where relevant. Therefore this paragraph should be deleted.

Centre Policies

We note that, Policies S19 (Gillingham District Centre) and S20 (Strood District Centre), refer to "*All proposals should...*". As these policies relate to development within the Centres, in order avoid any ambiguity and provide certainty for applicants, policies should clearly state "*All proposals within the centre should...*".

Section 9 - Transport

Policy DM15 – Monitoring and Managing Development

Our client supports the general approach to this Policy. However, the title of the Policy does not reflect its content. Policy DM15 is a transport related policy and should be titled accordingly. We recommend that this Policy is renamed to reflect the transport matters in which it deals with and to avoid confusion.

Policy T20 – Riverside Path

Whilst our client supports the general approach to this Policy, as set out within our commentary on Policy S5, there are potential land ownership / third party matters when implementing schemes which can limit fully implementing provision of footpaths to adjacent sites. Policy T20 should provide flexibility to allow the facilitation of links within the developer / landowners control, to ensure that as adjacent sites come forward for development there is the ability to provide a continuous link without limiting progress with implementation.

By providing flexibility within the Policy, this will allow for effective and appropriate riverside paths to be incorporated into developments.

The Policy also states that *'development proposals will demonstrate how any impacts will be mitigated'*. The Policy is not clear in providing details about what impacts are required to be assessed as part of this Policy.

Whilst we do not object to the Policy, it is recommended that it incorporate flexibility for Waterfront developments to provide public spaces and walking / cycling links where possible and appropriate and that clarity is provided in terms of what impacts are required to be assessed.

Policy DM19 – Vehicle Parking

Our client generally supports the approach of the Policy. However, there is clarity required regarding Electric Vehicle ('EV') charging points and the requirement across the Borough. The Policy states that *'All on-street and off-street parking bays will accommodate an electric vehicle charging point'*. There is ambiguity whether this requirement is for active or passive EV spaces to be provided within developments. If the requirement is for 100% of spaces to be required to be active EV spaces, this is considered an unrealistic and excessive expectation for developers which is unlikely to be deliverable in all scenarios, therefore conflicting with paragraph 16(b) of the NPPF.

We recommend that the Policy provides clarity on the percentage of EV spaces which will be required to be active and those which will be required to be passive. The Policy is currently unclear on the level of EV which would be required and we therefore object to the Policy on this basis.

The Policy also provides details of the parking standards within Appendix B ('**2010 Addendum**'). We note there is flexibility within the 2010 Addendum which allows for a reduction to the standards where justified within a Transport Assessment. The Policy should also incorporate this flexibility which recognises that a reduction to the standards can be justified when set out within a Transport Assessment submitted as part of a planning application.

Policy DM20 – Cycle Parking and Storage

Whilst our client supports the general approach of the Policy, the Policy does not provide clarity of what the *'adopted cycle parking standard'* is. Policy DM19 provides specific reference to Appendix B, whereas Policy DM20 is ambiguous as to what cycle parking standards are referred to.

Whilst we don't object, we recommend that the Policy provides specific reference to the standards as set out within Policy DM19.

Section 10 – Health, Communities and Infrastructure

Policy DM21 – New open space and playing pitches

Our client supports the general approach of the Policy. However, the Policy is unclear in its aims and therefore does not accord with paragraph 16(d) of the NPPF. The table within the Policy provides a column titled 'Catchment' which appears to relate to the catchment in which existing open space should be located from a development. However, the specific Policy relates to new open space which should be provided as part of the proposals (our underlining).

The Policy therefore is ambiguous as currently worded. In order for the policy to be effective, and for it to comply with NPPF paragraphs 16(d), it needs to be explicit what the aim of the Policy is and what the catchment relates to.

The Policy should also provide sufficient flexibility which allows the existing open spaces in the vicinity to be assessed to inform how proposed open space and playing pitches should be reasonably delivered within developments.

We object to the Policy in its current form as it is ambiguous and is not effective in its aims at delivering open space and playing pitches within the Borough.

Summary and Conclusion

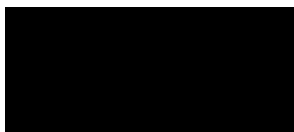
We trust that this correspondence will be fully considered by the Council as part the preparation of the new Local Plan.

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

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

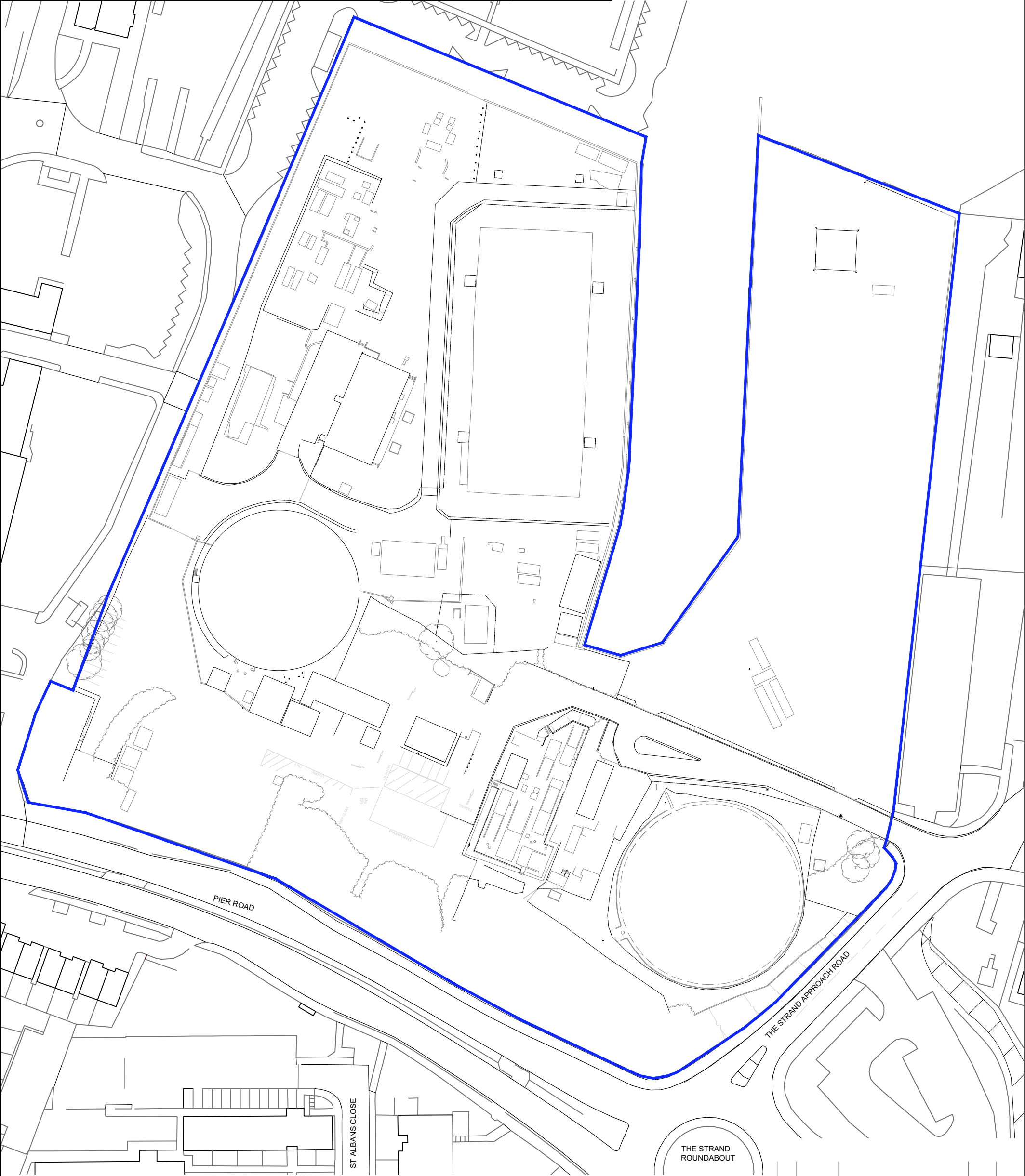
In the meantime, if you have any questions please contact Amelia Robson or Alistair Ingram at these offices.

Yours faithfully



Savills (UK) Ltd
Planning

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



KEY
<div></div> - Land within Client's Ownership

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

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

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



Medway Council Local Plan 2041

Regulation 18b Consultation

September 2024

**Consultation response
by**



DEAN LEWIS.
ESTATES LIMITED

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1 INTRODUCTION

1.1 Background

1.1.1 Dean Lewis Estates Limited is a professional strategic land promotion company specialising in the delivery of sustainable residential and mixed-use development.

1.1.2 This submission provides Dean Lewis Estates Limited response to and representations in respect of this Regulation 18 consultation into the 'Medway Local Plan 2041'.

1.1.3 This submission focuses on the key planning policy considerations for the Medway Local Plan to enable its successful implementation, thereby sustainably meeting the identified full objectively assessed needs for housing (OAN) and enabling the wider regeneration of Medway to continue in concert with economic growth and delivering significant social and environmental net gains throughout the plan area.

1.1.4 For completeness, it is also appropriate to state that Dean Lewis Estates Limited is part of a consortium of promoter and developer partners that are working together to promote development at Hoo St Werburgh and on the Hoo Peninsula to enable successful delivery of the planned growth required to meet the needs of Medway up to 2041.

1.1.5 The Consortium members comprise:

- Church Commissioners for England
- Dean Lewis Estates
- Gladman Developments
- Homes England
- Taylor Wimpey

1.1.6 The areas of land within the control of Dean Lewis Estates are deliverable in their own right and are not contingent upon any other third-party land ownerships or infrastructure. It should also be noted that the Dean Lewis Estates land has the capability to provide community benefits substantially in excess of that needed to serve the development of solely the Dean Lewis Estates land.

- 1.1.7 These benefits, such as circa 120 acres of community parkland and strategic environmental mitigation will facilitate growth being brought forward by Dean Lewis Estates and the Consortium.
- 1.1.8 Dean Lewis Estates is also promoting land at Stoke Road, Hoo St Werburgh, High Halstow and Cliffe Woods. All the land promoted by DLE can genuinely be regarded as deliverable and sustainable.

2 CONTEXT

2.1 Regulation 18b Consultation – Medway Local Plan

- 2.1.1 These representations build on the responses to the consultation 'Setting the Direction for Medway 2040' which was consulted on in Autumn 2023 by Medway Council.
- 2.1.2 The consultation seeks to define the 'Vision and Strategic Objectives' for the new Local Plan. The information provided on proposed policies and options for a development strategy - the potential sites and broad locations that could form allocations for development in the new Local Plan is the subject of responses and representations by Dean Lewis Estates in this document.
- 2.1.3 The consultation considers how the local plan could meet housing needs of around 28,000 new homes over the plan period. This scale of growth will involve significant change across Medway. Three broad options for growth are considered:
- **SGO1** – Urban Focus – this seeks to maximise development and density in urban centres and waterfront sites, with some limited growth adjoining existing towns and villages.
 - **SGO2** – Dispersed Growth – this provides for less urban regeneration and considers development across broader suburban and rural areas; and
 - **SGO3** – Blended Strategy – this promotes a 'brownfield first' approach supporting urban regeneration, complemented by greenfield sites in suburban and rural locations to provide for wider housing choice.
- 2.1.4 The Council has identified **Option SGO3** as its preferred indicative approach at this stage and has set out more details of what this strategy could look like, in a draft policies map.
- 2.1.5 It is also acknowledged that further evidence base reports will be produced for Regulation 19 stage and that these Strategic Options may change, having regard to the evidence base which has yet to be published.
- 2.1.6 The local plan Reg 18 consultation is also published alongside an interim Sustainability Appraisal. Comments of the draft SA are also covered in this consultation response.

Preferred spatial growth option

2.2 Background

- 2.2.1 It is evident that the three variant Spatial Growth Options are not mutually exclusive. In our view, **Dean Lewis Estates support** the council's preferred **Spatial Growth Strategy (SOG3 – Blended Strategy)**.
- 2.2.2 SGO 3 combines some of the essential elements set out within SGO 1 – Urban Focus and SGO 2 – Dispersed Growth. The blended SGO 3 option achieves the best balance of sustainability considerations by integrating urban regeneration with suburban and rural development, promoting sustainable travel, and addressing the needs of diverse communities. Overall, this option is likely to ensure a diverse range of housing types and tenures can be provided across Medway and economic needs can be met whilst directing the majority of new development to sustainable locations. Strategic growth on the Hoo Peninsula, specifically on land at Cookham Farm, would form an integral component of this sustainable growth option.

2.3 Responses to Medway Local plan Reg 18 Consultation Questions:

- 2.3.1 Dean Lewis Estates representations and responses to the Council's key questions below are presented on this basis.

Question 1: The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach, and what standards would be appropriate?

- 2.3.2 Policy S1: '**Planning for Climate Change**' states that "The Council will require new built development to contribute to the mitigation of, and adaptation of climate change through:

Effective spatial planning and placemaking

- Directing the spatial strategy for growth to locations that provide better access to services, or which are capable of delivering improved services.

- Reducing the need for travel, through co-location of services and an accessible network of centres.
- Designing for walking and cycling and providing for sustainable transport choice.
- Designing for the wellbeing of people and wildlife, promoting public health and strengthening networks for nature”.

2.3.3 The development of the rural town centred on Hoo St Werburgh and additional growth on the Hoo Peninsula, including land at Cliffe Woods and High Halstow and other outlying settlements will enable the effective spatial planning and placemaking of the Hoo Peninsula to be achieved whilst simultaneously contribute toward the plan objective of Medway becoming carbon net zero by 2050. Development on the Hoo Peninsula at the scale planned for in SOG3 will deliver new and improved essential services and infrastructure which will help to reduce to the need to travel and provide for more self-reliant communities where day to day needs such as schools, employment, health provision, amongst others, can be met locally.

2.3.4 The use of **renewable and low carbon technologies in development** is **supported by DLE**.

2.3.5 However, **DLE Object to the provision of decentralised energy and heating**, as expressed in related draft **Policy T41 Heat Networks. Policy T41 requires modification**.

2.3.6 The intention of this policy is laudable, but its practical application is potentially unviable and unnecessary.

2.3.7 As part of the Future Homes Standard, from 2025 new homes will only be able to install energy efficient heating systems that will produce 31% lower emissions compared to the current levels. This means that the installation of gas boilers will cease at this time. The UK government released its publication for the Heat and Buildings Strategy in October 2021. Low carbon technology such as air source or ground source heat pump heating installations achieve greater efficiencies than the current target of 31% improvement when compared to modern gas boilers.

-
- 2.3.8 Crucially the installation of air or ground source heat pumps only requires an electricity supply. In contrast, Heat Networks requires the main source, often a power plant, biomass plant or waste disposal plant which all burn fossil fuels. One of the byproducts of these systems is latent heat which is distributed from the central source to consumers through a network of underground pipes that are often laid in roads and communal open space.
- 2.3.9 A simple comparison of viability of the two methods demonstrates that the infrastructure costs associated with Heat Networks is exponentially higher than the comparatively low cost of installing ground or air source heat pumps.
- 2.3.10 The costs associated with the Heat Network are generated by the high cost of laying the underground pipe infrastructure from the source to the consumer. This also involves the costs associated with the acquisition or agreements to cross third party land. The long-term maintenance of the infrastructure is also a cost passed onto the consumer. In contrast, no underground infrastructure is necessary for ground or air source heat pumps.
- 2.3.11 **Policy T41 Heat Networks is unjustified and lacks the necessary supporting evidence** to demonstrate that it is operable or necessary.
- 2.3.12 **The policy requires modification allow for the communal use of Heat Networks provided that they are viable. Crucially the policy should recognise that alternative forms of Heat Infrastructure for domestic heating that complies with the relevant building regulations at the time implementation will also be permitted.**
- 2.3.13 **The restrictive element of the policy that requires consideration of Heat Networks in the first instance and only then alternative forms of heat generation permitted should be removed from the policy.**

Question 2: Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view?

- 2.3.14 **Policy S2: Conservation and Enhancement of the Natural Environment is supported by DLE.** The policy requires development proposals to provide a measurable net gain of 10% in biodiversity in line with the recognised Defra metric. Presently no detailed evidence is available discreet to Medway that would justify departure from the national policy. The Viability Assessment of BNG in Kent in 2022 that assessed the costs of BNG on development concluded that some areas within Kent can achieve higher levels of BNG, however this study does not provide a comprehensive baseline of Medway’s environmental assets, nor does it specifically relate to the prospective development sites within the SHLAA. **Dean Lewis Estates support the policy threshold of the statutory minimum of a 10% increase in BNG in line with government policy.**

Question 3: Do you agree that the tariff based strategic approach applied to development within 6 km of the designated areas, supporting the delivery of the Bird Wise SAMMS programme represents an effective means of addressing the potential impact of recreational disturbance on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.

- 2.3.15 **DLE support the strategic approach applied to development within 6 km of the designated areas.**

Question 4: Do you consider that Medway Council should identify landscapes of local value as an additional designation in the new Local Plan. What should be the criteria for designation? Are there areas that you would identify as justifying a local valued landscape designation – where and why?

- 2.3.16 **Policy S4: Landscape protection and enhancement** species that development proposals should demonstrate how they respect and respond to the character, key sensitivities, and qualities of the relevant landscape character areas, as detailed in the Medway Landscape Character Assessment. **Dean Lewis Estates support the principle set out within Policy S4** that the **Medway Landscape Character Assessment** should be the reference document used to determine the basis of the landscape character assessment for purpose of decision making. **Additional local value designations out with the Medway Landscape Character Assessment are not supported by Dean Lewis Estates.**

Question 5: Do you agree that the Council should promote Natural England's Green Infrastructure Framework standards in the Medway Local Plan policy?

&

Question 6: Has the draft Medway Green and Blue Infrastructure Framework identified the correct key issues and assets, and provide effective guidance for strengthening Medway's green infrastructure?

- 2.3.17 This response constitutes Dean Lewis Estates response to questions 5 & 6.
- 2.3.18 **Dean Lewis Estates conditionally support the principle of reference to Natural England's Green Infrastructure Framework standards when assessing major development proposals.** However, it is important that these general standards treated as guidance only as site specific circumstances should be the determining factor as how best to conserve and enhance the network of green and blue infrastructure across rural and urban Medway.

2.3.19 **Policy S5: Securing Strong Green and Blue Infrastructure** states that major new development proposals will be expected to submit a Green Infrastructure Plan as part of a Design and Access Statement setting out how will meet policy/objectives/GI principles. The proposals at Cockham Farm, Main Road, Hoo St Werburgh will deliver a major area of designated green and blue infrastructure in the form of new Community Parkland and an area of Strategic Environmental Mitigation. **It will be necessary for the Council to secure financial contributions under S106 to enable full implementation of this Strategic Environmental Mitigation that is necessary to serve the growth needs across the whole of the Hoo Peninsula. The proposals at Cockham Farm will make land available and will contribute its share towards the costs of implementation commensurate with the quantum of development at Cockham Farm.** However, the benefits of protecting and enhancing these designated environments is beneficial across the whole of Medway. Therefore, a tariff based S106 policy should apply to developments across the whole of Medway. **Dean Lewis Estates would suggest a two-tier policy where development within the zone of influence pays a higher tariff and development outside pays a lesser contribution.**

Question 8: Do you consider that exceptional circumstances exist to justify review of the Green Belt boundary?

2.3.20 **Dean Lewis Estates** consider that **exceptional circumstances do not exist to modify** the green belt boundaries. The proposed minor amendments to take account of boundary anomalies are acceptable and justified. **Release of green belt land within Medway for major development would be unjustified.**

Question 10: Do you think this policy provides effective guidance on the required housing mix in Medway?

2.3.21 **Dean Lewis Estates** consider that the **Policy T2: Housing Mix provides appropriate guidance** to developers with regard to Housing

Mix. Given the Local Plan period is up to 2041, **Dean Lewis Estates** also **welcome** the fact that policy builds in **flexibility** and has regard to local requirements, as evidenced through the **Medway LHNA, or updated reports.**

Question 28: Would provision of a supermarket in Hoo be beneficial to residents to encourage sustainable travel patterns, convenience and sustainable lifestyles?

2.3.22 **Dean Lewis Estates support Policy S22** when read together with the supporting reasoned justification. It is also noted that Policy S22 should be read in conjunction with **Policy DM12**. It is acknowledged within the supporting text to policy S22 that a main centre that could accommodate a larger convenience retail offer would be best co-located with other community uses to ensure benefits are optimised that best serve new communities. **The Land at Church Farm, Main Road,** offers one such potential location. This development approach will encourage residents to form more sustainable travel patterns.

2.3.23 Chapter 9 of the Regulation 18b Consultation deals with Transport.

2.3.24 Vision for access and movement in Medway states that,

"The Hoo Peninsula has reduced car dependency and achieved a higher level of self-containment to facilitate local living in an age of increased remote working, while local employment opportunities are available at Kingsnorth and the Isle of Grain. Travel choice to/from the rural area has been improved through planning and investment in public transport".

2.3.25 **Dean Lewis Estates support this Vision** which will enable new growth on the Hoo Peninsula to deliver a greater level of sustainability for the existing resident community and for the new community by achieving greater self-containment through the provision of new homes, employment and essential community infrastructure. Investment in Public Transport

will be a crucial element of the transport strategy enabling greater internalisation of journeys on the peninsula, utilising public transport rather than the private motor vehicle. Journeys further afield beyond the peninsula will also create greater patronage of public transport facilitated with the increase in frequency of public transport.

2.3.26 This investment in public transport improvements will help to bring about a major reduction in carbon emissions from transport early in the plan period.

2.3.27 **Policy DM18: Transport Assessments, Transport Statements and Travel Plans** states that development proposals that will generate a significant amount of movement will be supported by a Transport Assessment, Transport Statement and/or a commitment to provide a Travel Plan. Specifically, Policy DM12 also states that Development proposals on the Hoo Peninsula will adhere to an Area-wide Travel Plan.

2.3.28 The supporting text to **Policy DM12** notes that the Area-wide Travel Plan to cover the Hoo Peninsula will help to:

- reassure local communities in providing for better transport;
- deliver the proposed place-based vision for access and movement;
- satisfy the requirements of the relevant transport authorities;
- provide for a smooth planning process; and
- address air quality and noise impacts.

2.3.29 **Dean Lewis Estates, working with the Hoo consortium, will work positively with Medway Council to develop the Area-wide Travel Plan.** The objectives of which are to create a modal shift reducing the reliance on private vehicle journeys and encouraging journeys on public transport, and by cycling and walking. This will be achieved through a combination of measures including land use master planning, financial contributions towards the upgrade and reinforcement of public transport, provision of attractive walking and cycling networks and other incentives to encourage less reliance on private vehicle journeys.

2.3.30 Dean Lewis Estates also agrees with the principle of a vehicle trip credit and believes that a 10% reduction (Policy DM15) in vehicle trip generation is an achievable target for developments on the Hoo Peninsula against current trip levels, if the appropriate levels of mitigations are implemented at both local and strategic levels. Whilst a further reduction in vehicle trips should be targeted, consideration should be given to how the 10% reduction in vehicles is applied to the trip credit as the Vision-led strategy set out within the STA should already minimise vehicle trips on the road network. A Sustainable Transport Strategy for the Hoo Peninsula will help to both achieve and potentially further increase the modal shift away from private car use.

2.3.31 Dean Lewis Estates consider that allocated sites should be prioritised for trip credits ahead of speculative applications and that vehicle trip budgets should not be degraded by developments not accounted for in the Local Plan.

2.3.32 **Health, Communities and Infrastructure**

In addition to the health and wellbeing issues noted, a key component of wider community infrastructure is “education”, both Primary and Secondary provision – which is not specifically identified in the questions below. **The Regulation 19 plan should be site specific** as to where Primary and Secondary education provision will be made to serve the needs of the resident communities on the Hoo Peninsula.

Representations to Regulation 18 Medway Local Plan September 2024

1. Introduction and background

Savills Planning Team in Cambridge is instructed by St John's College, Cambridge to make relevant and necessary representations to the Medway local plan (Regulation 18, 2024).

The publication of this version of the Local Plan follows an earlier Regulation 18 publication back in October 2023.

On behalf of our client, St John's College, Cambridge we submitted representations to that plan in terms of a Call For Sites to seek the residential allocation of their land holding west of Town Road, Cliffe Woods. The representations took the form of a document setting out the College's vision for the site and the background and design intent with regard to the masterplan. This document has been revised and updated and is submitted as part of comments to this current consultation process – it supports the Council's preferred indicative approach in SG03 for a "Blended Strategy" which identifies the College's land in Cliffe Woods for new housing.

The Council's preferred option is entirely appropriate in the context where the authority undertook an extensive consultation process "Setting the Direction for Medway 20240" in Autumn 2023. At paragraph 1.1.3 of the current Regulation 18 document, the Council acknowledged that following on from the consultation in 2023 there is no consensus on how the new local plan should address the issues and opportunities in Medway. It is certainly not unusual to have a range of responses and in such a context it is entirely appropriate for the Council to assess that feedback and provide for a strategy to cover the planning period in a way that addresses Medway's needs and boost investment in services, jobs and homes through new development.

As Chapter 3 of the consultation document references, the Council has assessed three strategic growth options.

- SG01 – Urban Focus – this looks at maximising development on brown field sites in urban centres and waterfront sites where such sites would benefit from good transport links at accessible locations. Whilst laudable, we share the Council's concerns about the delivery of such sites given viability issues as well as securing meaningful high density development without compromising design and heritage concerns.
- SG02 – Dispersed Growth – this considers some land coming forward through regeneration as well as more releases of green field and Green Belt land. With environmental concerns, including a heavy reliance on car journeys, we agree that this is not an option to be pursued by the Council.
- SG03 – Blended Strategy – this is the Council's preferred option and is supported by our client, St John's College, Cambridge. It maintains a "brownfield first" focus with regeneration in urban centres and waterfront locations whilst implementing a range of other sites in suburban and rural areas. In our view it provides the right balance between providing for sites in the most sustainable locations whilst also ensuring that housing numbers reflect design



guidance and heritage constraints. The Council's own Sustainability Appraisal (June 2024) states at paragraph E22 within Volume 1 *"on the whole, this option (3), is likely to ensure a diverse range of housing types and tenures can be provided across Medway (SA objective 7) and economic needs can be met (SA objective 12) whilst directing the majority of new development to sustainable locations"*.

At paragraph 5.3.4 of Volume 1 of the Council's Sustainability Appraisal it confirms that Option 3 (Blended Strategy) is the preferred Option stating *"overall, Option 3 is likely to offer the best balance of sustainability considerations by integrating urban regenerations with suburban and rural development, promoting sustainable travel, and addressing the needs of diverse communities. Although, some adverse impacts are likely, including potential for localised adverse effects on the landscape through loss of undeveloped land (SA objectives 4 and 6), and generation of pollution and waste (SA objective 5). Careful co-ordination and planning would be needed to ensure that investments and infrastructure can be directed to address the diverse needs of the community. On the whole, this option is likely to ensure a diverse range of housing types and tenures can be provided across Medway (SA objective 7) and economic needs can be met (SA objective 12) whilst directing the majority of new development to sustainable locations"*.

This option is now presented to Medway's Council as the proposed spatial strategy and is supported by our client, St John's College, Cambridge.

The adoption of this preferred strategy means that the Council has identified what a strategy should look like within a draft Policies Map. The Policies Map indicates that our client's land west of Town Road, Cliffe Woods is identified as Site SR4 for housing. Rather unusually in our view there is no other reference to the site specifics for Site SR4, such as site area, estimated site capacity etc. and in the absence of a site schedule it is difficult to assess how the Council is meeting its housing requirements. We suggest that this issue should be resolved in the Regulation 19 version of the local plan when published.

2. Land West of Town Road, Cliffe Woods

St John's College, Cambridge is the land owner of site reference SR4 which is identified for residential development in the North West inset of the Policies Map for the Regulation 18 version of the local plan published in 2024. The College is supportive of this land being allocated for housing and forming part of the Council's preferred spatial strategy to deliver new development in the planning period up to 2041.

The site is some 6.33 hectares in extent and lies to the south west of Cliffe Woods, adjacent to Town Road on its eastern edge and Lillechurch Road on its southern edge. The land immediately to the north was granted reserved matters consent in February 2022 and development is near completion. Furthermore, approval has been granted for development of 68 dwellings on the eastern side of Town Road through application MC/21/1694, subject to amendment. This continues to establish the development edge further to the south. With such developments on the adjacent land this further sustains the logic of identifying the College land for new housing. A report setting out the context and design approach for the site has been prepared on behalf of the College and should be read in conjunction with these representations. The emerging concept plan responds to,



and enhances the links to the surrounding landscape and new and existing areas of Cliffe Woods whilst delivering much needed housing within Medway district, consistent with the SG03 Blended Strategy option as a fair approach from the Council.

We hope that these representations together with the attached report are helpful to the Council in terms of supporting the site being delivered for new housing within the local plan and look forward to being kept informed of local plan progress.



Flood Risk and Drainage Note

Prepared on behalf of St John's College Cambridge

ARDENT
CONSULTING ENGINEERS

AN EMPLOYEE OWNED COMPANY

Project Name	Land at Cliffe Woods Kent
Client	St John's College Cambridge
Project Ref	2405360
Report Ref	2405360-ACE-XX-XX-RP-C-0321
Date	August 2024

DOCUMENT CONTROL

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1.0 INTRODUCTION

1.1 Overview

Ardent Consulting Engineers (hereafter referred to as "Ardent") has been commissioned by St John's College, Cambridge to provide a technical summary of the flood risk and surface water drainage constraints to the proposed development site at Land at Cliffe Woods, Kent. This technical note is intended to inform the masterplanning process and pre-application discussions.

2.0 Site Information

2.1 Site description

The site is located to the southwest of Cliffe Woods, Kent. The site is bounded by Town Road to the east and Lillechurch Road to the South. The site is bounded to the north by a new housing development by Redrow Homes (Planning ref: MC/19/0287), with arable fields to the west. A location plan is provided in Figure 2-1 and indicative masterplan in Appendix A.



Figure 2-1: Site location plan

2.2 Hydrology

Analysis of Environment Agency LIDAR data (see Section 2.3) indicates the site is bounded by small drainage ditches on the south, west and northern edges of the existing field (see Figure 2-2). A drainage ditch is also located to the south of Lillechurch Road, and appears to drain westwards away from the site. A small existing pond is located in the centre of the south of the site adjacent to the drainage ditches. Further investigation of the drainage ditches is required to identify any existing structures and where the ditches drain towards, including identification of any potential connections to the ditch south of Lillechurch Road.

Additionally, a private lake is located immediate east of Town Road adjacent to the site. It is not known where the outfall from the lake drains to. Further investigation is required to determine if the lake outfalls to the drainage ditches along Lillechurch Road.

There are no Environment Agency (EA) Main Rivers within the vicinity of the site.



Figure 2-2: Local hydrology

2.3 Topography

Environment Agency 1m LIDAR data has been obtained to provide an overview of the site

topography and is presented in Figure 2-3. Most of the site slopes south towards the existing pond at approximately 17.5m AOD in the south of the site, from a high of approximately 20.5m AOD at the northern boundary. The northwest of the site slopes towards the drainage ditch along the western boundary. Detailed site topographic survey will be obtained to support the site design and associated planning applications.



Figure 2-3: Site topography

2.4 Ground conditions

A review of the British Geological Survey (BGS) mapping indicates that the geology of the site consists of the London Clay Formation, with no superficial deposits. The LandIS SoilScapes mapping indicates the soils underlying the site consist of loamey clay. The underlying geology of the site indicates infiltration rates at the site are likely to be low and therefore there is likely to be limited potential for infiltration based drainage features.

2.5 Adjacent development

The site is bounded to the north by a development by Redrow Homes that received outline planning permission in 2019 (ref: MC/19/0287). The review of accompanying drainage documents on the planning portal has been undertaken to identify potential implications for the



development site.

The surface water drainage network for the proposed development does not incorporate any infiltration to ground to discharge runoff due to the underlying impermeable London Clay geology. Soakage testing does not appear to have been needed to support the decision to have no infiltration and has not been submitted in support of the application. The surface water drainage network drains northwards, away from the proposed development site.

Southern Water sewer mapping shows a foul sewer running along Town Road from north to south to the west of the site. A branch of this foul sewer includes a manhole located in the northeast corner of the site.

3.0 Policy Context

3.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) was introduced on 27 March 2012. This document was revised most recently in December 2023; where paragraphs 165 to 175 inclusive establish the Planning Policy relating to flood risk management. The Technical Guide to the NPPF was superseded by the Planning Practice Guidance (PPG) in March 2014.

The NPPF states all plans should apply a risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change –to avoid where possible, flood risk to people and property. They should do this and manage residual risk, by:

- a) safeguarding land from development that is required for current and future flood management;
- b) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
- c) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development including housing, to more sustainable locations.

3.2 Non-statutory technical standard for sustainable drainage system (March 2015)

The Non-statutory technical standards for sustainable drainage systems were published in March 2015. They should be used in conjunction with the Planning Practice Guidance. In addition, the

Best Practice Guidance for the Non-statutory technical standards were published in July 2015 by LASOO.

The Kent SuDS Design Guide provides further guidance on the application of sustainable drainage systems. In addition, SuDS should be designed in accordance with CIRIA 753 SuDS Manual, which represents current best practice.

3.3 Sequential and Exception Test

As a small area of the site is located within an area of surface water flood risk the Sequential Test would be required to support the proposed development under the requirements of the NPPF. If the site is to be allocated within the Local Plan then it is likely that the Sequential Test will be undertaken as part of the allocation process.

Additionally, the Medway Council Sequential Test Report states in Para 4.12 that *"To apply a sequential test, sites where the risk of surface water under a high or medium is <40% of the gross site area, were filtered, regardless of Flood Zone classification, and these sites were considered to pass the Sequential Test."* Under these conditions the proposed development would be considered to pass the Sequential Test (see Section 4.2).

It is recommended that the requirement for the Sequential Test is confirmed with the Local Planning Authority. The Exception Test would not be required as the site is located within Flood Zone 1.

4.0 Sources of Flooding

4.1 Fluvial and Tidal Flood Risk

The Environment Agency's Flood Map for Planning is shown in Figure 4-1. The entire site is located within Flood Zone 1, meaning the annual risk of flooding from fluvial sources is <0.1%. The fluvial and tidal flood risk is therefore classed as Low.

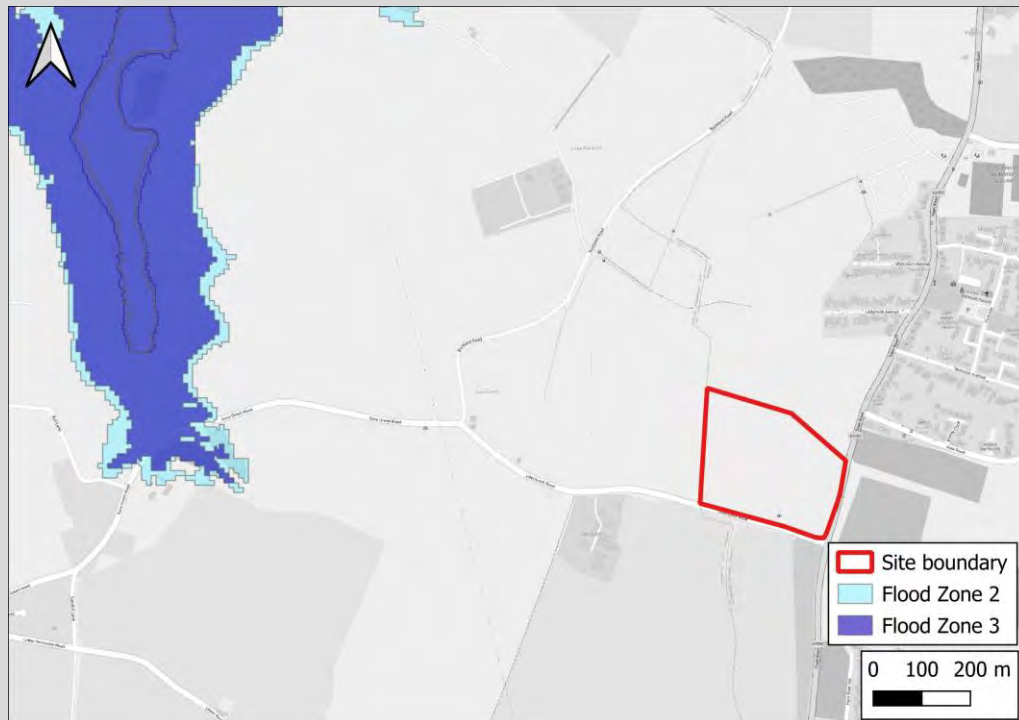


Figure 4-1: Environment Agency Flood Map for Planning

4.2 Surface Water Flood Risk

The Environment Agency Risk of Flooding from Surface Water (RoFSW) mapping is shown in Figure 4-2. The design surface water flood event for the site is a 1% Annual Exceedance Probability (AEP) event uplifted by 45% to account for climate change, though in the absence of any mapping for this event the 0.1% AEP event is used as a proxy.

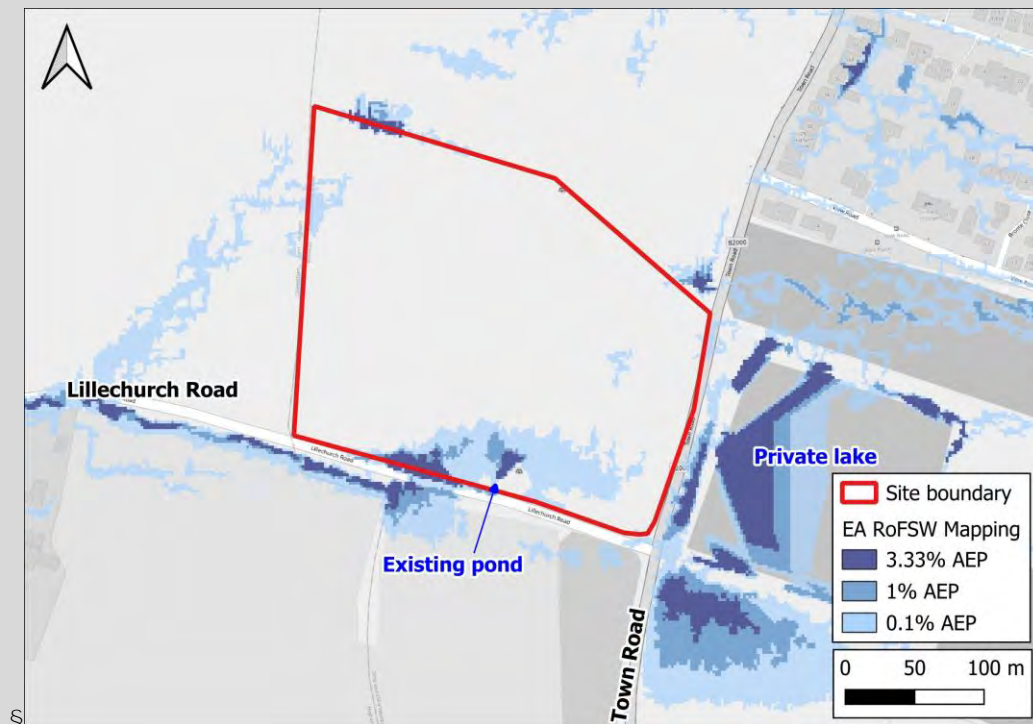


Figure 4-2: EA Risk of Flooding from Surface Water mapping

The majority of the site is shown to be at a very low risk of flooding from surface water (<0.1% annual probability of flooding). During the 3.33% AEP (high risk) and 1% AEP (medium risk) events surface water flood risk is contained to the lowest lying areas of the site, including the existing pond and drainage ditches. During a 0.1% AEP event (low risk), taken as the design event for the site, an area of flooding across the south of the site is predicted, though the EA mapping shows the majority of this as depths of below 0.3m.

Analysis of the EA mapping and LIDAR data indicates that negligible overland flows are predicted to enter the site from offsite. The land to the north largely slopes northwards away from the proposed development, while to the east Town Road and the private lake act as topographic barriers to prevent overland flows moving westwards.

As a result, the flooding shown in the EA mapping during a 0.1% AEP event is considered to be generated by runoff from within the site boundary ponding in the lowest part of the site, with Lillechurch Road forming a minor topographic barrier. As a result, the surface water drainage network for the proposed development would sufficiently mitigate against flood risk in these areas. Additionally, if any culverts under Lillechurch Road are present it is anticipated this would reduce the flood risk within the site boundary.

Details on how surface water flood risk will be managed via the site design and onsite drainage network are provided in Section 5. This would need to be confirmed following further investigation to understand the connectivity of the surrounding ditch network.

4.3 Groundwater Flood Risk

The site is underlain by the London Clay Formation. Generally, groundwater flood risk is considered lower in areas of clay geology as it forms an impermeable barrier impeding **groundwater emergence**. The Environment Agency's Long Term Flood Risk Service identifies that groundwater flooding is unlikely at the site due to the underlying geology.

The overall groundwater flood risk is considered to be low, though a site investigation should be undertaken to confirm the composition of the ground and the existing groundwater levels. If groundwater levels are found to be high then mitigation measures may be required, such as avoiding basement development and designing drainage features to mitigate against groundwater ingress.

4.4 Sewer Flooding

The 2020 Medway Council Level 1 SFRA records four sewer flooding incidents within the area of Cliffe Woods approximately 225m north of the site, with Cliffe Woods identified as a sensitive drainage area (though the proposed development site is not covered by this). The proposed drainage network on-site will be designed so there is no flooding to properties for the 1% AEP plus 45% climate change storm event. As a result, the risk of sewer flooding to the development is considered to be medium to low.

Anglian Water should be contacted to confirm there is sufficient capacity within the foul network along Town Road to accommodate the development proposals.

4.5 Artificial Sources

The Environment Agency's Reservoir Breach Flood mapping shows the site is not predicted to be at risk of flooding from a reservoir breach event. The risk of flooding to the site from artificial sources is therefore considered to be low.

5.0 Indicative Flood Risk Mitigation Measures

5.1 Surface water flood risk mitigation

As outlined in Section 4.2, the surface water flood risk within the site is largely generated from within the site boundary. As a result, the proposed drainage network (see Section 5.2) is anticipated to notably reduce the surface water flood risk within the site boundary. Therefore, it is considered appropriate to locate the proposed drainage basins within the areas shown to be at a low risk of surface water flooding.

5.2 Sustainable Drainage Systems

To ensure the development does not increase the surface water runoff generated by the site, sustainable drainage systems will be incorporated to restrict the discharge from the site in accordance with national and local policy (see Section 3).
In accordance with the NPPF Planning Practice Guidance, surface water runoff should be disposed of according to the following hierarchy:

- a) Into the ground (infiltration);
- b) To a surface water body;
- c) To a surface water sewer, highway drain, or another drainage system;
- d) To a combined sewer.

As discussed in Section 2, the **Site’s underlying geology** likely provides limited opportunity for infiltration, though infiltration testing and groundwater monitoring may be appropriate to confirm this. Under the drainage hierarchy, it is likely that surface water runoff from the development will be discharged to the ditches surrounding the site via gravity. This follows the existing drainage regime for the greenfield site. Further investigation may be required to confirm where the ditches drain to away from the site, as well as the ownership of the ditches so they are suitable to discharge to.

To ensure the requirements for sustainable drainage features are accounted for in the masterplanning process, indicative drainage calculations have been undertaken to estimate the potential size requirements for surface water attenuation features. In line with the indicative masterplan provided in Appendix A three basins have been sized, one draining the centre and southwest and one draining the east. For the purpose of the assessment it is assumed that 70% of the development areas are impermeable. The basins have been calculated assuming flows are restricted to the 1 in 100-year greenfield runoff rate of 7.23l/s/ha during a 1 in 100-year plus 45% climate change event. The indicative basins and associated catchments are shown in Figure

5-1, with the calculations summarised in Table 5-1.



Figure 5-1: Surface water flood risk vs initial masterplan

Table 5-1: Basin volume calculations

Catchment	Development area (ha)	Indicative impermeable area (ha)	Storage needed (m ³)	Basin depth (m)	Basin Area (m ²)
1	0.92	0.64	646	0.7	1380
2	1.56	1.09	1095	0.7	2325
3	1.16	0.81	817	0.9	1510

A conservative approach has been taken for the basin sizing, assuming no infiltration is viable at the site. The storage volume required in each basin is reduced by 5% to allow for storage within swales or permeable paving across the site. A minimum maintenance strip of 3m will be required

around proposed detention basins, though it is possible to include footpaths and highways within the maintenance strip. A freeboard of 300mm is assumed within the basins. This requirement may require some low-level local ground raising. The calculated basin areas are indicative and will need to be recalculated, once the detailed layout is prepared, based on the final proposed discharge rates, actual impermeable area, a topographical survey and ground investigation.

The proposed drainage strategy will consider utilising strategic swales (where practicable) as shown in the indicative masterplan. The swales will also require a minimum maintenance strip of 3m on at least one side. Greenway conveyance routes/swales will be considered to provide biodiversity and water quality improvement. Additionally, it is anticipated that the use of permeable paving, within parking courts and shared surfaces will also provide some attenuation for surface water runoff as well as water quality benefits.

5.3 Recommendations for further work

The Sequential Test should be undertaken either as part of the allocation process, or as part of any planning application. The requirements of this should be confirmed with the Local Planning Authority, though under the conditions outlined in the Medway Council Sequential Test Report the proposed development would be considered to pass the Sequential Test.

Further investigation is required to identify where the ditches around the site boundary drain towards, particularly where the proposed drainage network will outfall to. Ownership of the ditches will also need to be confirmed where connections are proposed.

It is assumed the foul drainage network for the site will connect to the existing foul sewer along Town Road. Southern Water should be contacted to confirm there is sufficient capacity within the existing network to accommodate the development proposals.

Works to and along the existing ditches may require an ordinary watercourse permit. It is anticipated this would be obtained from the Lead Local Flood Authority following planning permission being granted.

A Flood Risk Assessment will need to be prepared in accordance with the NPPF, demonstrating how the site remains safe for its users and does not have a detrimental impact on flood risk to third party land. The Flood Risk Assessment will include a surface and foul water drainage strategy, outlining how flows from the development will be managed using sustainable drainage features.

Flood Risk and Drainage Note

Prepared on behalf of St John's College Cambridge



Appendix A – Indicative Site Masterplan



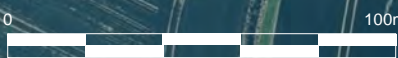
REDROW DEVELOPMENT

CLIFFE WOODS

PRIVATE LAKE

LILLECHURCH ROAD

TOWN ROAD





LAND WEST OF TOWN ROAD
- **CLIFFE WOODS** -
SEPTEMBER 2024





CONTENTS

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We have been instructed by our client, St John's College, Cambridge to submit representations to the Medway Call for Sites. The vision document will cover the necessary technical assessments to promote the site and set sustainable aspirations in creating a new neighbourhood. Our consultants are as follows:

- **Savills** – planning and project management
- **fabrik** – masterplanning and landscape design
- **Paul Basham Associates** – transport, infrastructure
- **Ardent** – drainage
- **MKA** – ecology.





OUR AMBITION 1

Our vision is to create a new vibrant neighbourhood, which is integrated as part of the village of Cliffe Woods and creates an attractive southern gateway, creating a sensitive response to its rural character. To achieve this vision, the neighbourhood will offer a blend of attractive architecture, well-managed landscape with biodiversity enhancements, access to existing historic features and new foot and cycle connections.

The site will be **physically, socially and environmentally sustainable**. Provision of infrastructure to promote sustainable movement methods such as walking and cycling will ensure good access through the development and the adjacent neighbourhoods. **Low carbon development** and sustainable energy principles will be promoted throughout the scheme, as will green infrastructure.

The new neighbourhood will have a clear identity and character, and create a place in which people aspire to live. It will create opportunities to provide a mix of housing that delivers the needs of local people. The scheme will offer **robust and adaptable** buildings, and a positive response to the characteristics of the site and wider area.

Through the use of a well-planned and integrated green and blue infrastructure strategy, the site will provide spaces and places of **beauty** for new and existing residents to enjoy. Water will play a key role in

defining destination points, linking areas of open space and enhancing the overall experience of walking around the neighbourhood.

The development will provide a new **gateway** to Cliffe Woods along Town Road, creating a sense of arrival to the village.

Our approach to placemaking has drawn out three key objectives, which reflect what makes Cliffe Woods unique, alongside best practice enshrined in the National Design Guide, namely:

- 1 Resilient living
- 2 Living with nature
- 3 Locally rooted.

These key objectives will help to define and shape a place that is both **sustainable** and **rooted** in Cliffe Woods.

2 BACKGROUND

CLIFFE WOODS

Located in the unitary authority of Medway, Cliffe Woods is a small estate village on the northern most border of Kent. It is a short 10 minute drive from the River Thames to the north and its closest major town is Rochester, 20 minutes to the south and with direct rail routes in to London.

Local amenities include grocery stores, a post office, a church and a community centre, located within Cliffe Woods local centre. Additionally, there is nursery and primary schooling, as well as a number of parks and play spaces within a 10-15 minute walk.



PHOTOS OF CLIFFE WOODS

THE SITE




The site lies to the south-west of Cliffe Woods, adjacent to Town Road on its eastern edge and Lillechurch Road on its southern edge. The site is bordered to the north by a new housing scheme, which is currently under construction. The site is located adjacent to arable fields to the west and south of the site.

Rows of poplar trees are features within the landscape and also run along the site's northern and western edges. These create visually defensible boundaries and form distinctive features within the site for the masterplan to draw upon and enhance. There are 2 historic pillboxes located on site, 1 next to the existing pond and the other on the sites northern boundary. The site is within walking distance of a number of public rights of way (PROWs).

The site is relatively flat, with a slight gradient downwards, generally in a north to south direction. There is a natural pond at the most-central southern part of the site, which is surrounded and covered in shrub planting, located adjacent to the existing pillbox. Ditches run along the entirety of each edge of the site and also have the capacity to hold water.



PHOTOS OF THE SITE

-  SITE BOUNDARY
-  EXISTING PUBLIC RIGHT OF WAY
-  BUS STOP



TOWN ROAD

MERRYBOYS ROAD

BUCKLANDS ROAD

VIEW ROAD

LILLECHURCH ROAD

LEE GREEN ROAD

TOWN ROAD

400M WALKING DISTANCE (5 MINUTES)

800M WALKING DISTANCE (10 MINUTES)

500m



PLANNING CONTEXT

LOCAL PLAN POSITION

Medway Council are in the process of drafting a new Local Plan, consisting of a vision for Medway's future development up until 2040. Having previously run three Regulation 18 Stages between February 2016 and June 2018, the Council subsequently undertook a new Call for Sites process at the start of 2023. This allowed for an up-to-date assessment of land availability, which is needed as part of the plan-making process.

The timetable set out in the Local Development Scheme (published February 2024) sets out as follows:

Regulation 18a – Setting the direction for Medway 2040 (September and October 2023)

Regulation 18b – Reasonable alternatives of the spatial strategy (June – July 2024)

Regulation 19 – Publication of the draft local plan (January 2025)

Regulation 20 – Representations on the draft local plan (January – February 2025)

Regulation 22 – Submission to the Secretary of State (June 2025)

Adoption – determined on outcome of Examination (Autumn 2026)

As part of the process summarised above, Land west of Town Road has been submitted through the Call for Sites as a suitable site for residential development and representations in support of the site's suitability have and will continue to be submitted at the relevant consultation stages.

It is also noted that there is a made Neighbourhood Plan for Cliffe and Cliffe Woods (2023). Whilst it does not include any specific allocations for residential development, instead relying on the emerging Medway Local Plan to designate any such sites, it provides relevant policies such as relating to design, heritage, density, open space and other such factors. This Neighbourhood Plan forms part of the Development Plan.

THE SITE

The site sits adjacent and to the south of a consented scheme for up to 225 dwellings plus additional infrastructure. The scheme gained outline permission in February 2021 under reference MC/19/0287 and reserved matters consent in February 2022 under reference MC/21/1287. The site is currently being built out by Redrow.

An additional adjacent scheme to the east of the site by Esquire Developments, consisting of 68 dwellings, gained approval in January 2023 under reference MC/21/1694.

Now that the adjacent site is being built out, the Land west of Town Road seems to be a logical and sustainable location for further residential development within Cliffe Woods.

The site is located to the south of the built-up settlement of Cliffe Woods and consists of agricultural land bordered by shrubs and trees. The site can currently be accessed from Lillechurch Road to the south of the site, but access is proposed to be taken from Town Road to the east of the site.

Cliffe Woods is a sustainable settlement which comprises of a number of services and facilities including a doctor's surgery (approx. 500m from site), community centre (approx. 400m from site) and primary school (approx. 800m from site). Frequent bus services run through the village, connecting Cliffe Woods with Chatham, Rochester and Cliffe, amongst other destinations. The closest bus stop to the site is approximately 250m away. Additionally, Higham Railway Station is located approximately 1.5 miles from the site, providing services to London Bridge, Luton and Rainham.

In conclusion, the site is within a highly sustainable location, located to the south of Cliffe Woods, providing a logical, suitable location for new residential development within the village.



In December 2022, MKA Ecology Limited was commissioned by St John’s College, Cambridge to undertake a Preliminary Ecological Appraisal at Land west of Town Road, Cliffe Woods. This was in order to support promotion of the Site for residential development in the emerging Medway Council Local Plan. The Appraisal included a habitat survey, protected species scoping survey and a desktop study of protected sites and species in the area.

Considerations

The Thames Estuary & Marshes Ramsar and Special Protection Area (SPA), Medway Estuary & Marshes Ramsar and SPA , North Downs Woodlands Special Area of Conservation (SAC) and Peters Pit SAC are within 10km of the site. Areas for recreation should be considered to minimise impacts from increased visitor pressure on these designated sites.


Further ecological surveys will be required to identify habitats, plants, reptiles, bats and birds amongst other species within the site. The Preliminary Ecological Appraisal recommends surveys, and mitigation requirements to ensure that protected species are protected and enhanced wherever possible. Throughout the masterplanning process of the site, these findings and recommendations have been taken into consideration and have formed the basis for understanding where development on the site could occur.


Development Opportunities


Ecological enhancements could contribute to national and local conservation targets through the planting of native species, the protection of trees within the design scheme, the expansion and enhancement of hedgerows to create an extensive species-rich hedgerow network within the site. Furthermore, additional features such as wildlife ponds, green roof provision, bat and bird boxes and traditionally managed green space could form part of the plan for the site.


A Biodiversity Net Gain initial assessment of the site has been undertaken in order to understand the current baseline of the site, and its potential net gain increase. This concludes that the current landscape designs will achieve the 10% net gain target set by the Environment Act 2021 and could possibly be exceeded subject to further work.


The inclusion of enhancement features in line with the National Planning Policy Framework will also contribute towards a net positive change in biodiversity on site and ensure a sustainable development which helps to achieve both local and national biodiversity targets.


- 


SITE BOUNDARY
- 


C1A - ARABLE FIELD MARGINS
- 


C1C5 - WINTER STUBBLE
- 


G3C - OTHER NEUTRAL GRASSLAND
- 


R1A6 - OTHER EUTROPHIC STANDING WATERS
- 


U1B5 - BUILDINGS
- 


H2B5 - HEDGE ORNAMENTAL NON NATIVE
- 


W1G6I - LINE OF TREE (ASSOCIATED BANK OR DITCH)
- 

R1E - CANAL OR DITCH
- 

POINT FEATURES - TARGET NOTE
- 

RABBIT ORYCTOLAGUS CUNICULUS WARREN
- 

STANDING DEAD TREE
- 

FALLEN DEADWOOD
- 

TREE T1 SUPPORTING FEATURE OF LOW BAT ROOST POTENTIAL



ADJACENT
DEVELOPMENT

CLIFFE
WOODS

PRIVATE
LAKE

LILLECHURCH ROAD

TOWN ROAD

0 100m

DRAINAGE & WATER

Analysis of Environment Agency LIDAR data indicates the site is bounded by small drainage ditches on the south, west and northern edges of the existing field. A drainage ditch is also located to the south of Lillechurch Road, and appears to drain westwards away from the site. A small existing pond is located in the centre of the south of the site adjacent to the drainage ditches. Additionally, a private lake is located immediate east of Town Road adjacent to the site. There are no Environment Agency (EA) Main Rivers within the vicinity of the site.

Based on Environment Agency 1m LIDAR data, most of the site slopes south towards the existing pond at approximately 17.5m AOD in the south of the site, from a high of approximately 20.5m AOD at the northern boundary. The northwest of the site slopes towards the drainage ditch along the western boundary. Desktop evidence of the underlying geology of the site indicates infiltration rates at the site are likely to be low and therefore there is likely to be limited potential for infiltration based drainage features. This is reflected by the Redrow development to the north not incorporating any infiltration to ground due to the underlying impermeable London Clay geology. The Environment Agency's Flood

Map for Planning identifies the entirety of the site within Flood Zone 1. The Environment Agency Risk of Flooding from Surface Water mapping indicates the majority of the site is shown to be at a very low risk of flooding from surface water (<0.1% annual probability of flooding). During the 3.33% AEP (high risk) and 1% AEP (medium risk) events surface water flood risk is contained to the lowest lying areas of the site, including the existing pond and drainage ditches. During a 0.1% AEP event (low risk), taken as the design event for the site, an area of flooding across the south of the site is predicted, though the EA mapping shows the majority of this as depths of below 0.3m.

Analysis of the EA mapping and LIDAR data indicates that negligible overland flows are predicted to enter the site from offsite. The Environment Agency's Long Term Flood Risk Service identifies that groundwater flooding is unlikely at the site due to the underlying geology.

The surface water flood risk within the site is largely generated from within the site boundary. As a result, the proposed drainage network is anticipated to notably reduce the surface water flood risk within the site boundary. To ensure the

development does not increase the surface water runoff generated by the site, sustainable drainage systems will be incorporated to restrict the discharge from the site in accordance with national and local policy. Under the drainage hierarchy, it is likely that surface water runoff from the development will be discharged to the ditches surrounding the site via gravity. This follows the existing drainage regime for the greenfield site. Further investigation may be required to confirm where the ditches drain to away from the site, as well as the ownership of the ditches so they are suitable to discharge to.

The above technical information is sourced from report reference 2405360-ACE-XX-XX-RP-C-0321 prepared by Ardent and dated August 2024. Please refer to the full report for a more detailed understanding of the drainage context and technical recommendations.



Local hydrology plan



EA Risk of flooding from surface water



Site topography

SITE CONSIDERATIONS & OPPORTUNITIES

This development represents an opportunity to meet the increasing need for housing within Medway and build upon the foundations the adjacent development sets in creating an arrival experience and transition into the village. The following considerations have been taken into account through the masterplanning process leading to the opportunities shown in the adjacent plan.

Considerations






- The site is bounded by an existing tree line to the north and hedgerows on its east, west and southern boundaries. Appropriate buffers will need to be given to these landscape features
- A large area of surface water flood risk is located in the southern part of the site. The site slopes slightly down towards the south-western corner. Sufficient sustainable drainage features will be provided to manage flows on the site
- Two World War II pillboxes are located on the southern edge of the site and within the vegetation on the northern boundary. Although not listed, these features should be retained and enhanced
- The provision of vehicular access to the site from Town Road

- While there are no PROWs on site, it is important to create a network of pedestrian routes through the site that connect to wider routes. This will support permeability and access to Cliffe Woods.

Opportunities

- Provision of circa 2.6 ha of high quality open space which provides the natural foundations from which enhancements to local biodiversity and habitats can be made
- Integration of naturalistic SuDS features within the open space, to create beautiful, natural places that help to enhance the quality of the landscape and promote Biodiversity Net Gain (BNG)
- Potential creation of pedestrian/cycle links to the north will be explored
- Creation of green links to areas of open spaces, linking ecological assets and also creating placemaking spaces which new homes will frame
- Retention and enhancement of existing trees and hedgerows where possible, aiding in creating visually defensible boundaries on the edges of the site

- Setting development back from Town Road and provision of a 2m footpath on the inside of the existing hedge to improve pedestrian access.

-  SITE BOUNDARY
-  EXISTING TREE BELT
-  EXISTING HEDGE
-  PROPOSED OPEN SPACE
-  EXISTING SHRUB
-  VEGETATION BUFFER
-  SURFACE WATER FLOOD RISK
-  ADJACENT DEVELOPMENT
-  DEVELOPABLE AREA
-  EXISTING PRIVATE LAKE
-  CONTOUR
-  EXISTING PUBLIC RIGHT OF WAY
-  EXISTING ROAD
-  POTENTIAL SPINE STREET
-  PARISH BOUNDARY
-  DIRECTION OF WATER FLOW
-  PROPOSED GREEN LINK
-  PROPOSED BUFFER PLANTING
-  SITE ACCESS
-  POTENTIAL PEDESTRIAN LINK TO ADJACENT DEVELOPMENT
-  VILLAGE GREEN
-  EXISTING POND
-  WORLD WAR II PILLBOX



ADJACENT
DEVELOPMENT

CLIFFE
WOODS

DEVELOPABLE
AREA

DEVELOPABLE
AREA

DEVELOPABLE
AREA

SITE
ACCESS

PRIVATE
LAKE

LILLECHURCH ROAD

TOWN ROAD



3 DESIGN INTENT

Our design approach is centred around a holistic composition of landscape, nature and community. This is to ensure any development is sympathetic to its location and surroundings. The design is inspired by the local vernacular, weaving landscape through the new neighbourhood and creating accessible natural spaces for the whole community.

The concept masterplan has evolved from initial site investigations and an understanding of how the site sits within its built and landscape context. The immediate features such as boundaries, vegetation, trees and topography have helped to shape the concept masterplan and the rationale behind it.

Our design rationale is provided overleaf and sets out the following four-stage approach to the development of a concept for the new neighbourhood:

- 1. Set your boundaries** - identifies the extent of the site, easements set and defining factors
- 2. Green and blue approach** - sets out a defined landscape framework that links ecological and natural assets around the site, while providing logical locations for SuDS

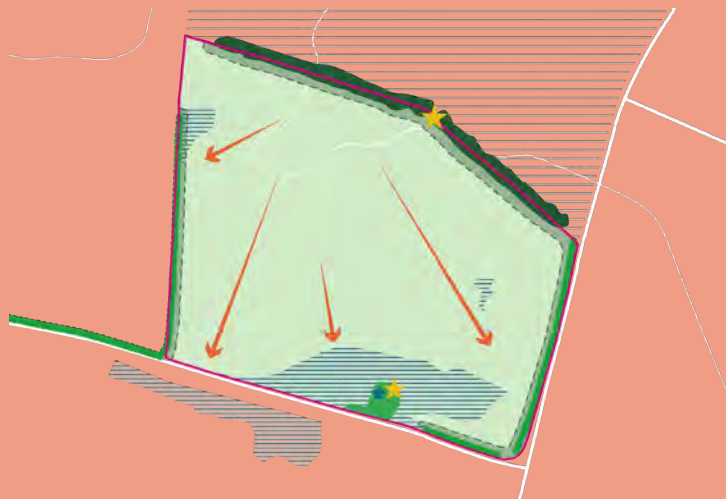
- 3. Link the community** - carves out the movement network within and around the new neighbourhood, including pedestrian, cycle and public transport routes, promoting sustainable local travel
- 4. Grow your village** - ensures that new homes and natural spaces reflect the character of the local area, to create a unique and welcoming place to live and enjoy.





RATIONALE

1. SET YOUR BOUNDARIES



The limits to development within the site are set by a series of factors including:

- Topography of the land, being at its highest to the north and falling to the south
- Surface water flood risk along the southern edge of the site
- Buffers to existing vegetation on all boundaries, including a large treebelt along the site's northern edge
- Two World War II pillbox's located on the northern and southern edges of the site
- The site's relationship to the neighbouring scheme to the north.

2. GREEN & BLUE APPROACH



The strategy for green infrastructure looks to reference and build upon existing features and the network being created by the neighbouring scheme, so that the new neighbourhood integrates with the wider village and feels a part of Cliffe Woods. The landscape strategy enhances planting whilst also creating strategic views through the site.

Green routes run both north-south and east-west to enhance pedestrian permeability across the site. Where the green routes intersect, a village green is proposed, creating a heart to the neighbourhood, both for residents and wildlife.

A number of SuDS ponds will be provided in the lowest parts of the site. Swales are proposed along the north south channels of open space.



3. LINK THE COMMUNITY



Alongside the landscape framework, the movement network forms a key structuring element. The spine street runs from Town Road and creates a gateway into the site. This leads to a central pedestrian-friendly space, fronted by both built form and open space. Local routes will lead from the spine street and this central space, providing access to the rest of the site.

A network of pedestrian and cycle routes connect through the open spaces. Direct pedestrian connections will be created from Town Road, providing walkable access to Cliffe Woods. The opportunity exists to create links to the adjacent development to the north and provide a safe route from the village to Lillechurch Road.

4. GROW YOUR VILLAGE



This new development will create a unique place to live and explore, providing an attractive gateway to Cliffe Woods. The green and blue infrastructure will provide beautiful spaces for new and existing residents to experience, and offer the opportunity to observe the existing historic features.

Local character will be evident throughout the neighbourhood, ensuring it has its own identity whilst referencing the local vernacular and transition of village to countryside. A range of homes will be provided in varying densities and tenures, meeting the needs of the local community.

CONCEPT MASTERPLAN


The adjacent plan illustrates the concept masterplan for the site. It takes into consideration the characteristics, opportunities and design rationale explored through this vision document. This demonstrates the potential that the site has in terms of the location and extent of development, provision of public open space, the routes of streets and footpaths and the implementation of new vegetation and drainage elements.


The development concept is designed around a strong landscape structure, taking as its starting point the existing land form and vegetation, which act as form-givers for the development, with the purpose of delivering a development which responds to its location. It allows for complete permeability across the site, as well as in to existing and newly developed neighbourhoods.


Through a varied landscape design the development is likely to achieve a BNG of 40% in habitat units, approximately 200% in hedgerow units and 58% in river (ditch) units. This would also include the preservation and creation of native hedgerows and ponds which would be classified as Habitats of Principal Importance (HBIs) and Kent Biodiversity Action Plan (BAP) Priority Habitats. Additionally, 26 new trees, new shrubland and new wildflower will be planted across the site and there is potential to enhance the existing pillboxes so that they create hibernation refuges for bats.

The site can potentially incorporate other HPIs such as orchard/edible fruit trees into the design of the open spaces, reflecting the qualities found within the wider landscape character of Kent and the local area. An informal-orchard parkland blends the residential area with the qualities of the surrounding natural environment.


Overall, a sustainable, safe, attractive place will be created, with buildings and landscape defining streets and public spaces. The spatial concept for the site shows a substantial area of open space within the new neighbourhood, as a focus for interaction, recreation and biodiversity.

- 


SITE BOUNDARY
- 


RESIDENTIAL PARCEL
- 


FEATURE URBAN SPACE
- 


SPINE STREET
- 


SECONDARY STREET
- 


OTHER STREET
- 


PAVEMENT
- 


FOOTPATH
- 


SITE ACCESS
- 

PEDESTRIAN ACCESS
- 


POTENTIAL PEDESTRIAN LINK
- 


VILLAGE GREEN
- 


ENHANCED TREE BELT
- 

NEW HEDGE & SHRUB PLANTING
- 

CHILDREN'S PLAY
- 

GREEN CORRIDOR
- 

SUSTAINABLE DRAINAGE
- 

SWALE
- 

FEATURE URBAN SPACE

SCHEME BENEFITS



UP TO 130 NEW HOMES, INCLUDING 40% AFFORDABLE



CIRCA 2.6 HA OPEN SPACE



CIRCA 1.2 KM NATURAL WALKING ROUTES



POTENTIAL FOR 40% BIODIVERSITY NET GAIN





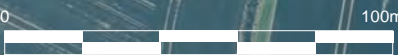
ADJACENT DEVELOPMENT

CLIFFE WOODS

PRIVATE LAKE

LILLECHURCH ROAD

TOWN ROAD



DRAINAGE STRATEGY


The proposed drainage strategy will consider utilising strategic swales (where practicable) as shown in the indicative masterplan. The swales will also require a minimum maintenance strip of 3m on at least one side. Greenway conveyance routes/swales will be considered to provide biodiversity and water quality improvement. Additionally, it is anticipated that the use of permeable paving, within parking courts and shared surfaces will also provide some attenuation for surface water runoff as well as water quality benefits.

To ensure the requirements for sustainable drainage features are accounted for in the masterplanning process, indicative drainage calculations have been undertaken to estimate the potential size requirements for surface water attenuation features. The drainage ponds shown on the masterplan are designed based on the assumption that 70% of the development areas are impermeable. The basins have been calculated assuming flows are restricted to the 1 in 100-year greenfield runoff rate of 7.23l/s/

ha during a 1 in 100-year plus 45% climate change event. A conservative approach has been taken for the basin sizing, assuming no infiltration is viable at the site. The storage volume required in each basin is reduced by 5% to allow for storage within swales or permeable paving across the site.

Southern Water sewer mapping shows a foul sewer running along Town Road from north to south to the west of the site. A branch of this foul sewer includes a manhole located in the northeast corner of the site. The proposed drainage network on-site will be designed so there is no flooding to properties for the 1% AEP plus 45% climate change storm event. As a result, the risk of sewer flooding to the development is considered to be medium to low.

The above technical information is sourced from report reference 2405360-ACE-XX-XX-RP-C-0321 prepared by Ardent and dated August 2024. Please refer to the full report for a more detailed understanding of the drainage context and technical recommendations.

-  SITE BOUNDARY
-  CATCHMENT AREA
-  INDICATIVE BASINS

Basin Volume calculations

Catchment	Development area (ha)	Indicative impermeable area (ha)	Storage needed (m³)	Basin depth (m)	Basin Area (m²)
1	0.92	0.64	646	0.7	1380
2	1.56	1.09	1095	0.7	2325
3	1.16	0.81	817	0.9	1510



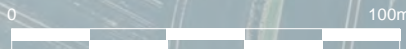


CATCHMENT 1

CATCHMENT 2

CATCHMENT 3

EXISTING POND



SUSTAINABLE BENEFITS

SUSTAINABILITY

Sustainable development can, and has been, defined in many ways by many different organisations. Sustainable development is at the forefront of national policy, set as a golden thread running throughout the National Planning Policy Framework (2021).

The 2030 Agenda for Sustainable Development provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries - developed and developing - in a global partnership. They recognise that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests.

The principles set out by the SDGs provide a comprehensive framework and should be a key consideration in the design and delivery of any new development, where possible. The SDGs provide an ideal and globally agreed set of targets to measure the success of achieving sustainable development.

The emerging proposals for Land West of Town Road, Cliffe Woods, aim to respond positively to the SDGs by:

- Creating well-designed landscaped and natural spaces, with clear access for all people, promoting health and wellbeing
- Providing an integrated landscape and drainage strategy that responds to climate emergencies and the opportunity to promote life both above land and below water
- Local accessibility and connections to sustainable routes, which promote cleaner travel to and from local destinations, such as schools, shops and community facilities
- Creating a well-designed proposal which promotes sustainable, affordable and cleaner ways of living.

CLIMATE CHANGE

Climate change mitigation means reducing our impact on the climate as far as possible. The emerging proposals aim to respond positively to this key issue by:

- Offering new and existing residents a realistic alternative to private car use through the creation of a new walkable and cyclable neighbourhood

- Creating increased and enhanced pedestrian and cycle links to better-connect the surrounding area
- Adapting to new technologies and sustainability standards
- Embracing the goals and targets set by Future Homes Standard to create sustainable and efficient homes.

Climate change adaption means ensuring that communities can evolve as our climate changes, to more extreme weather, a hotter climate, and a changing ecology. The emerging proposals aim to respond positively to this by:

- Providing areas for sustainable drainage through attenuation ponds that are able to more sustainably manage surface water runoff and storage, whilst providing opportunities for natural planting that promote biodiversity
- Developing a scheme that achieves BNG, not only retaining what is currently there on site but improving it above and beyond the minimum requirements.



4 SUMMARY

This vision document demonstrates the exciting potential for a new neighbourhood at Land West of Town Road, illustrating how it could be brought forward. In doing so, the emerging concept plan responds to, and enhances, links to the surrounding landscape and new and existing areas of Cliffe Woods, whilst delivering much-needed housing within Medway district.

The scheme's ethos is centred around health and wellbeing and sustainable living as key principles. Bringing forward this site with a landscape-conscious design will deliver a range of benefits to existing and new communities alike, while providing a naturalistic southern gateway for Cliffe Woods that provides a sense of arrival for to village.

SCHEME BENEFITS



PROVISION OF UP TO 130 NEW HOMES IN A RANGE OF SIZES & TENURES, FROM FIRST TIME-BUYERS TO FAMILY HOMES & THE PROVISION OF 40% AFFORDABLE HOMES



CREATION OF APPROXIMATELY 2.6 HA OF PUBLIC OPEN SPACE, WHICH PERMEATES THROUGHOUT THE SCHEME



CREATION OF CIRCA 1.2 KM OF NATURAL WALKS AROUND THE SITE VIA VARYING ROUTES



AN EMPHASIS ON A HIGH QUALITY SCHEME, ENSURING THE HEALTH & WELLBEING OF NEW RESIDENTS IS PRIORITISED



BIODIVERSITY ENHANCEMENTS, ACHIEVING A POTENTIAL 40% BIODIVERSITY NET GAIN, THROUGH SAFEGUARDING EXISTING ECOLOGY & THE CREATION OF NEW HABITATS

FIRST FLOOR STUDIO
THE OLD SCHOOL
EXTON STREET
LONDON
SE1 8UE

LENTEN HOUSE
16 LENTEN STREET
ALTON
HAMPSHIRE
GU34 1HG

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Future Medway Local Plan 2040

Response to the Regulation 18 Consultation 2024

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

On behalf of Kitesfield Estates Limited.

Prepared by:

Danielle Dunn BSc. (Hons) MSc. MRTPI

Date: 4th September 2024

Job Ref: 09.004.3376

ISSUE DATE / REVISION	COPY REVIEWED BY	DATE COPY HAS BEEN REVIEWED
30/08/2024	BY	30/08/2024

1. Introduction

- 1.1. We are writing on behalf of our client, Kitesfield Estates Limited, in respect of the Medway Local Plan (Regulation 18, 2024) consultation and its supporting background documents.
- 1.2. Our client continues to promote a 1.05ha brownfield site on the southern side of Ratcliffe Highway, Hoo St Werburgh, Rochester, ME3 8QB, known as 'The Depot' Ratcliffe Highway and herein referred to as site 'HHH41' for inclusion in the future Medway Local Plan (MLP).
- 1.3. The Depot site has not previously been included or identified in the Land Allocations Assessment (LAA) for Medway; it was submitted as an omission site during the 'Regulation 18 consultation – Setting the direction for Medway 2040' consultation held in September 2023. This was the first Regulation 18 consultation stage of the Local Plan creation and requested feedback on the vision and priorities for Medway's future growth.
- 1.4. Following the submission of The Depot site, it has been given the reference number HHH41 (See Figure 1) and has now been included in the LAA for Medway and assessed in the Interim Sustainability Appraisal, which forms an appendix for the current Regulation 18 Consultation.

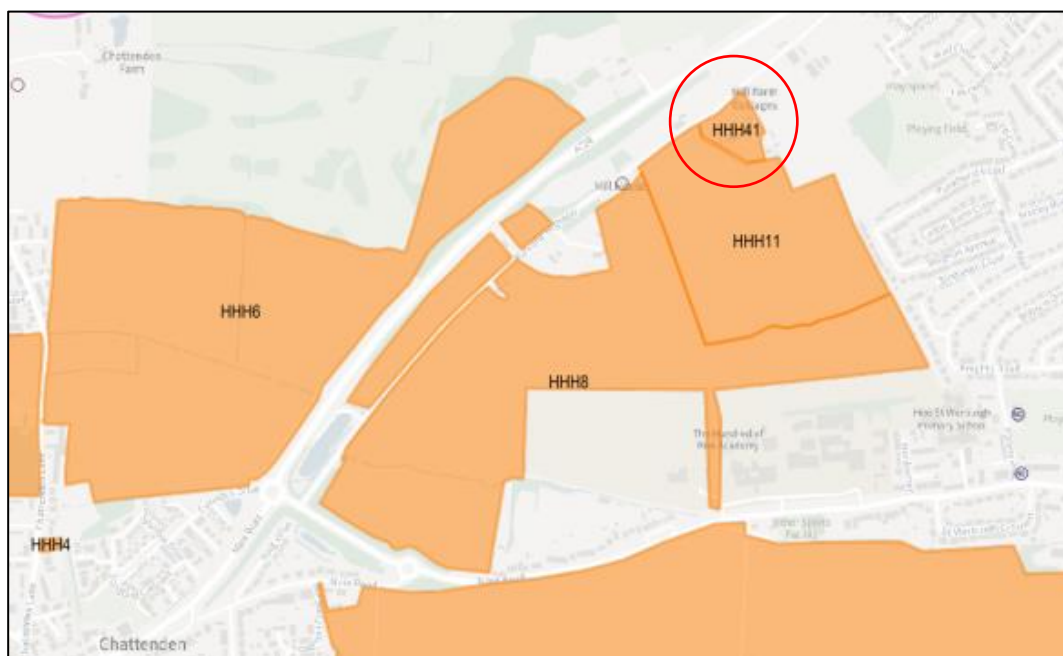


Figure 1: Extract from Policies Map Northwest identifying The Depot Site

- 1.5. In the current consultation documentation, the site has been identified as suitable for a residential led scheme, with an indicative capacity of 25 units. The site is included in the grouping of sites identified as '*reasonable alternative non-strategic sites*'.
- 1.6. This consultation response provides feedback on both the main Regulation 18 documents and its background documents, specifically the Sustainability Appraisal and the Viability Assessment. A Development Framework plan is also provided to support this representation. This provides an indicative layout for the site and considers the relationship of the site with the neighbouring sites, including those being considered at planning application stage and those which have been submitted for consideration in the Local Plan.
- 1.7. In summary, full **support** of the inclusion of the Depot Site, HHH41 in the future Medway Local Plan is provided by this representation.

2. Site Description and Relationship to Adjoining Sites

- 2.1. The 1.05ha brownfield site, on the southern side of Ratcliffe Highway, is a roughly triangular-shaped site accessed from its own permanent access off Ratcliffe Highway which would be suitable for a highways compliant access to serve the residential scheme proposed on this site. The site comprises hard standing and several buildings which serve the current business uses. A further review of Google Earth's historic mapping, identifies that the site has a history of commercial vehicle use as far back as the 1960s.
- 2.2. The site is located adjoining the Ratcliffe Highway to the north and on this boundary, it is screened by a band of hedging and vegetation. It is surrounded by agricultural fields to the south and west and there is a further narrow hedgerow which screens the site on these boundaries. These agricultural fields are subject to a planning application for outline consent (MC/23/1934) for 240 dwellings which is currently under consideration¹.
- 2.3. The eastern boundary extends to the access drive with the properties known as River View and Mill View Cottages located on opposing sides. The site access is located between the Mill View Cottages and the eastern boundary of the site, with the shared access extending southwards to the neighbouring property River View.
- 2.4. The site had a planning application approved with conditions under reference (22/1498) for retrospective provision of additional hard standing and enclosure between the depot and the highway for light industrial use including car sales. This extended the area of the site northwards towards Ratcliffe Highway, increasing the brownfield area of the site significantly.

¹ This adjoining application currently comprises a Development Framework only; details relating to the site layout and types and styles of residential dwellings have not been provided and would form part of a later Reserved Matters application.

3. Response to the Regulation 18 consultation 2024

- 3.1. The current Regulation 18 consultation 2024 provides the opportunity to comment on the emerging Local Plan, it sets out the proposed vision and strategic objectives for the plan, a range of policy areas, including the environment, economy, transport, housing, services and retail. It also sets out a proposed Policies Map that reflects the indicative preferred development strategy. However, it does not contain detailed site policies at this stage.
- 3.2. The results of this consultation will inform the final draft plan, due for publication in early 2025, which will include the detailed site policies.
- 3.3. This representation **supports** the inclusion of The Depot, Ratcliffe Highway site, HHH41, for inclusion in the future Local Plan for Medway and provides detailed feedback on individual paragraph numbers and policies as follows:
- Paragraph 1.2.2:- We support the vision for the plan which seeks to identify sites that will enable people to live healthier and longer lives. We consider that site HHH41, and its neighbouring sites, will provide a safe, connected and sustainable place to live and work in this part of the Hoo Peninsula.
 - Paragraph 1.2.8:- We support the statement that *'Housing-led growth can support wider investment in services and businesses and contribute to shaping the character of new and existing communities'*.
 - Paragraph 1.2.9:- The Plan will consider how Medway's infrastructure, such as schools, transport networks, health facilities, parks and community facilities, need to be upgraded in line with a growing and changing population. Site HHH41 is considered to be a well-located site, that will provide its future occupiers with access to facilities required for each stage of their lives. Furthermore, its location adjoining other sites provides the opportunity for economies of scale for infrastructure investment for an increasing population.

- Section 2.3 'Spatial Development Strategy' :- The aspirations of the Spatial Development Strategy for Medway are supported, specifically, *“Outside of the urban regeneration areas, the Council will support the expansion of identified suburban neighbourhoods and villages, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided”*.

Site HHH41 forms part of a grouping of sites to the west of Hoo St Werburgh, which have been identified as suitable for residential development. Although the individual land parcels are under different ownership and could be delivered individually, these sites, when developed together, will prevent isolated development and create a new neighbourhood area which would meet the aspirations of sustainable development.

Furthermore, section 2.3, sets out that *“Development will respond positively to the environmental context and realise opportunities to boost biodiversity and resilience”*. The HHH41 site is a brownfield site which has limited biodiversity value. The opportunity to redevelop the site will enable the provision of biodiversity enhancements and the creation of a green infrastructure which will connect the site to adjoining sites and the wider countryside. On this basis, the redevelopment of the site for residential uses would enhance biodiversity in accordance with National policy aspirations and the draft proposals in the Local Plan.

- Section 3 'Spatial Growth Options':- The choice of the preferred option 'SGO 3' is **supported**. This option blends regeneration and greenfield development, specifically with a 'brownfield first' focus. Site HHH41 is a brownfield site, that would meet the aspiration of this growth option. The redevelopment of the site would provide a better outlook and amenity for its current neighbours, and as previously stated would enable an increase in biodiversity and habitats on the site.

- Paragraph 3.1.5:- In considering options for sustainable development in Medway, the Council has sought to direct growth to brownfield sites first. This seeks to make use of previously developed land, and secure investment in regeneration. This position is **supported**. However, this regeneration agenda, which has been integral to Medway's change and growth in recent years, has focused on the evolution of town centres first. Future regeneration should not lose sight of sites that do not fall within the traditional Medway conurbation towns if there are also brownfield sites that would support the 'brownfield first' approach in the rural area.
- Policy S2 'Conservation and Enhancement of the Natural Environment':- The aspirations of this policy are **supported**. The redevelopment of The Depot site provides an opportunity to contribute and enhance the natural environment and its networks in accordance with the policy wording. As set out in the response to section 2.3, the HHH41 site only has limited biodiversity value at the current time, and the redevelopment of the site provides an opportunity for positive biodiversity and habitat improvement.
- Paragraph 4.6.2:- "Green infrastructure is intrinsic to good development and quality place making". This statement is **supported**, with site HHH41 providing a potential opportunity to enable the site to link with adjoining sites and the countryside.
- Policy DM2 'Contaminated Land':- Although a policy which sets out the requirement for remediation of contaminated land prior to development is understood and accepted, the policy should be worded to advise that contamination assessments would only be required at the detailed planning or reserved matters stages of a planning application. This would ensure that any proposals for outline consent are not prevented from coming forward due to viability constraints and planning application costs. Amended policy wording is suggested as follows:

“...Investigations and assessments of all sites situated on, or in close proximity, to potentially contaminated land will be required in conjunction with relevant detailed development proposals. This will identify potential risks to human health and the environment and where relevant, inform remedial measures and future monitoring to mitigate and monitor the risk”.

- Policy T1: Promoting High Quality Design. A policy to support design proposals is **supported**. However, a policy that has been drafted as a ‘catch-all’ to respond to every eventuality is considered to provide a risk of making some schemes unviable. It specifically does not respond well to different sized schemes, for example, as drafted the policy requires all schemes to provide public art, which would not normally be expected of smaller sites.

A further example is that the following criteria is considered to be unnecessary when all development is required to be ‘sustainable’ by preceding strategic policies. The criteria itself is also not quantifiable- *“There is demonstration of provision and/or access to essential services and facilities sufficient to support existing and new growth”.*

It is considered that the 21 criteria within the policy could easily be streamlined, and the policy would not be any less impactful. This is especially the case when there is a further Housing Design policy, set out at Policy DM5 (discussed further below).

Policy DM5: Housing Design:- In a similar response to Policy T1, the criteria in this policy should be reconsidered as some of the criteria would be better suited to a more overarching strategic policy. The last criterion of DM5, in particular, is considered to be unnecessary, lacking clarity, and would be better suited to a strategic policy:

“All new accommodation must, in addition to the general design policy above (T1): ●Design for flexible living, successful places are robust and support 'long-life and loose-fit' neighbourhoods that are flexible and adaptable to rapidly changing circumstances. The physical and social infrastructure provision required to create sustainable communities have been considered”.

This criterion, and the additional requirements for single aspect homes, seem more like a generic and vague aspiration than those based on a sound evidence base.

Policy T3: Affordable Housing: We **object** to the wording of this policy particularly the first two bullet points which set out the requirement for the level of affordable housing. This sets out that the Hoo Peninsula should provide 30% affordable housing and lower value areas, such as brownfield inner urban sites, provide 10% affordable housing.

This reduction to 10% affordable housing provision should also cover brownfield sites found elsewhere within the rural part of the district. The costs of remediation work required on rural brownfield sites, is no less than that of urban areas, and the requirement for providing 30% affordable housing in the Hoo Peninsula area could impact viability of these rural brownfield sites from the outset.

We represent a rural brownfield site, HHH41, which is located on the Hoo Peninsula, whereby the provision of 30% affordable housing on top of potential remediation works (unknown at this stage) could impact viability. It is important that the policy enables flexibility for these rural brownfield sites whilst viability assessments and surveying work are in their early stages.

In accordance with the Viability background document, the rates for affordable housing provision are based on the Medway Council Affordable Housing and CIL Viability Testing Report (GVA, January 2016), which was consulted on in 2019. This document sets out what is considered a higher or lower value area. We consider that this document is outdated, because it doesn't consider rural brownfield sites. The potential to update the document to consider this further should be provided.

In addition to an updated background document, we also propose that the policy is reworded as follows:

“● In high value areas, ~~including the Hoo Peninsula and suburban greenfield sites~~, 30% of all residential units proposed.

- In lower value areas, such as brownfield inner urban sites and rural brownfield sites, 10% of all residential units proposed”.
- Policy T11 ‘Small Sites and SME Housebuilders’, we support the inclusion of a policy which supports the provision of development by small and medium sized businesses, as these sites are often built-out quickly and support local jobs. Site HHH41 is considered to fall within the small site policy requirement and has an indicative capacity of 25 units. Its future development by a SME housebuilder would actively support the local economy.

4. Interim Sustainability Appraisal

- 4.1. Medway Council has worked with independent consultants to carry out an interim Sustainability Appraisal on potential development sites. This looks at the potential impacts of sites on the environment, economy and communities. This Sustainability Appraisal has identified a number of options for how Medway could grow up to 2041, including Spatial Growth Options (SGOs) and specific sites.
- 4.2. Site HHH41 is located on the main Ratcliffe Highway route, which directly accesses the Peninsula Way between the settlements of Hoo and Chattenden and has been identified in the Interim SA as a site suitable for residential redevelopment, with a capacity of 25 units.
- 4.3. We **support** the findings of the SA, and the inclusion of the site for residential development in the forthcoming Medway Local Plan (MLP). The site would form a positive approach to housing delivery in Medway on a brownfield site in accordance with the brownfield first principles, set as the preferred option for growth in the SA.
- 4.4. Table 8.15 of the SA outlines the reasons for selection / rejection of reasonable alternative non-strategic sites for the MLP. This table highlights that the HHH41 site has been selected because *“The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services”*. This position is **supported**.
- 4.5. Notwithstanding our support for the overall assessment of the site in the SA, we would wish to highlight that the site could score even higher than the SA assessments currently provide. Specifically, the assessments of the site undertaken through table 8.13 (post mitigation assessment of reasonable alternative sites, reproduced at Figure 2), scored the site positively in the climate change mitigation, housing and education categories. However, it was scored negatively in the categories, biodiversity and geodiversity, landscape and townscape and pollution and waste.

Site ref.	Site use	1 Climate change mitigation	2 Climate change adaptation	3 Biodiversity and geodiversity	4 Landscape and townscape	5 Pollution and waste	6 Natural resources	7 Housing	8 Health and wellbeing	9 Cultural heritage	10 Transport and accessibility	11 Education	12 Economy and employment
GS7	Residential led (Mixed-use)	+/-	+	-	+/-	-	+	+	+	0	++	+	+/-
GS8	Residential led (Mixed-use)	+/-	+	-	+/-	-	-	+	+	0	++	+	+/-
HHH1	Non-residential	+/-	+	-	--	--	-	0	-	0	-	0	+/-
HHH11	Residential led	+/-	+	-	-	--	-	++	-	0	-	+	+
HHH14	Residential led	+/-	+	-	-	--	-	++	-	0	-	+	+
HHH15	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	+
HHH16	Non-residential	+/-	+	-	-	--	-	0	-	0	-	0	+/-
HHH17	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	--
HHH18	Residential led (Mixed-use)	+/-	+	-	--	-	--	+/-	-	0	-	0	+/-
HHH19	Residential led (Mixed-use)	+/-	+	-	-	--	-	++	-	0	-	0	+/-
HHH21	Non-residential	+/-	-	-	+/-	-	+	0	-	0	-	0	+/-
HHH23	Residential led (Mixed-use)	+/-	+	-	-	-	-	+	-	0	-	+	+/-
HHH24	Residential led	+/-	+	-	-	--	-	++	-	0	-	0	+
HHH25	Residential led	+/-	+	-	-	--	-	++	-	0	-	0	+
HHH28	Residential led (Mixed-use)	+/-	+	-	-	-	-	+	-	0	-	0	+/-
HHH29	Residential led (Mixed-use)	+/-	+	-	-	-	-	+	-	0	-	0	+/-
HHH30	Residential led (Mixed-use)	+/-	-	-	-	-	-	+	-	0	-	0	+/-
HHH32	Residential led	+/-	-	-	--	+/-	-	+	-	0	-	0	+
HHH33	Residential led	+/-	+	-	-	--	--	++	-	0	-	0	+
HHH37	Non-residential	+/-	-	-	0	--	-	0	-	0	-	0	++
HHH38	Non-residential	+/-	-	-	0	--	-	0	-	0	-	0	++
HHH39	Non-residential	+/-	+	-	0	--	-	0	-	0	-	0	++
HHH4	Residential led	+/-	+	-	-	+/-	-	+	-	0	-	+	+
HHH40	Residential led	+/-	+	-	-	-	-	+	-	0	-	0	+
HHH41	Residential led	+/-	+	-	-	-	-	+	-	0	-	+	--

Figure 2: Screenshot of SA Table 8.13: Summary impact matrix of all reasonable alternative non-strategic sites (post-mitigation)

- 4.6. As set out previously in our response, the site is currently a brownfield site, predominantly used for vehicle salvage/repairs and sales. Redevelopment of the site would enable substantial mitigation of the current site and there would be a positive improvement to landscaping and through the provision of green networks an increase in biodiversity and geodiversity would also result. We consider that the SA scoring should be upgraded in the post mitigation assessment to reflect that, as part of the delivery of the site, there will be significant improvements to the Biodiversity and Geodiversity, Landscape and Townscape and Pollution and Waste scoring categories.

5. Site Viability and Availability

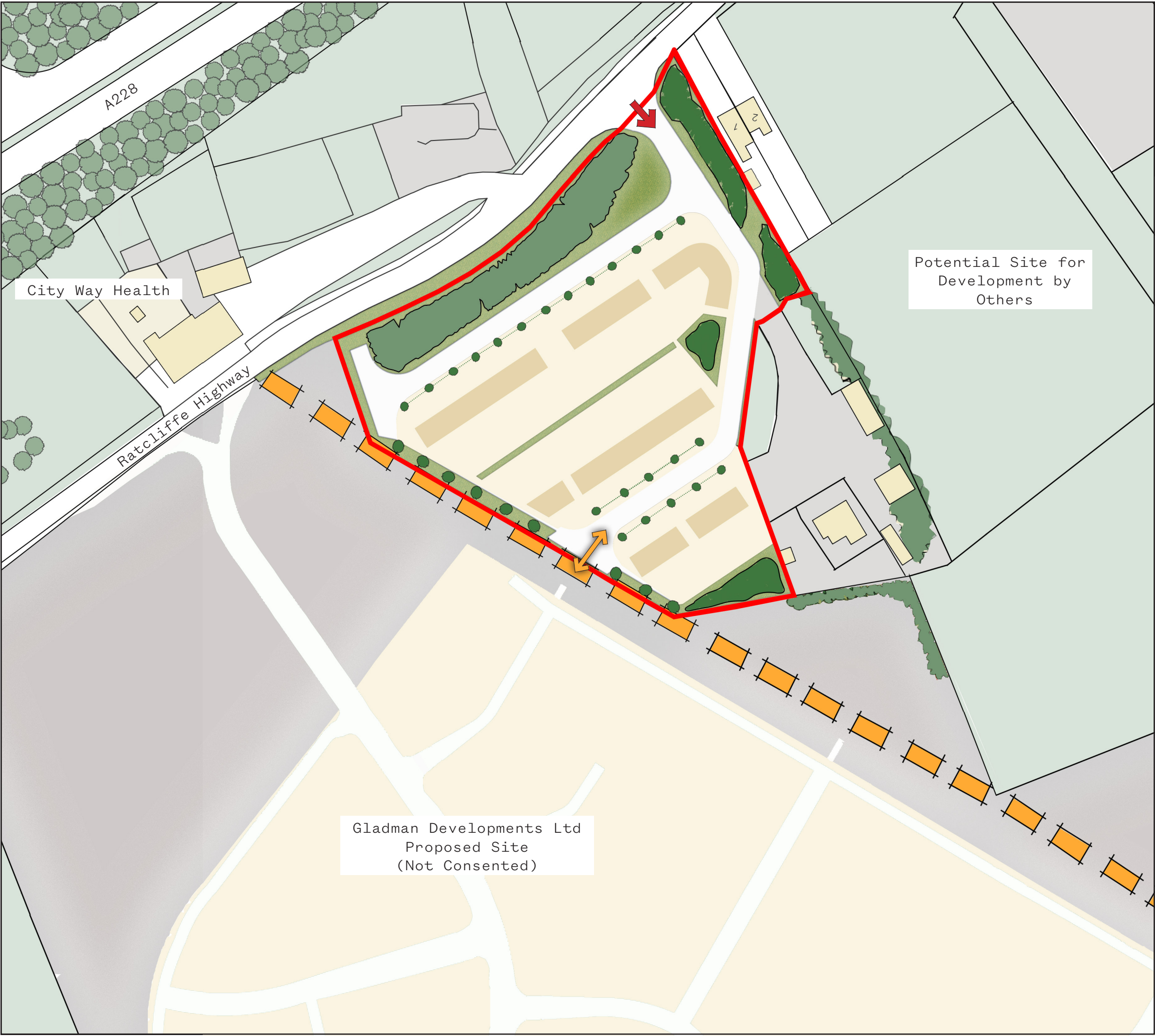
- 5.1. Paragraph 68 of the National Planning Policy Framework ('NPPF') requires for plan-making, local planning authorities ('LPAs') should identify and update a supply of specific deliverable sites sufficient to provide 5 years-worth of housing against their housing requirements with an additional buffer of 20% where there has been a record of persistent under delivery of. Furthermore, specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan need to be clearly set-out.
- 5.2. The site owners, Kitesfield Estates Limited, have confirmed that the site continues to remain available, developable and deliverable. Subject to its inclusion in the Local Plan, the site could become available in the first 5 years of the Local Plan period.
- 5.3. The Glossary of the NPPF defines deliverable and developable as follows:
- 5.4. *"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
 - 5.5. *a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
 - 5.6. *b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years".*
- 5.7. *"Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".*

6. Site Layout

- 6.1. Current National Policy, as set out at Paragraph 89 of the NPPF states “the use of previously developed land, and sites that are physically well related to existing settlements, should be encouraged where suitable options exist.”
- 6.2. The HHH41 site is located on the Ratcliffe Highway, a major through route linking Hoo St Werburgh to other Medway towns. It also has a strong relationship to the HHH11 Strategic site, which is a proposed housing development scheme currently being promoted for 240 residential units by Gladman under planning reference MC/23/1934.
- 6.3. Due to the close nature of the two sites, it can be confirmed that early discussions have been undertaken with the adjoining site promoter, and these discussions have helped produce a Development Framework for the HHH41 site, in a similar approach to the neighbouring site. This Framework has been provided as a supporting document to this representation.
- 6.4. This Development Framework demonstrates that the site could accommodate the indicative capacity of 25 units, whilst providing green networks through additional landscaping, tree planting and use of urban design principles. The promotion of the public footpath, which dissects the neighbouring sites, also provides an opportunity to provide a potential pedestrian link between the two sites.
- 6.5. It would be the intention of the site that a positive masterplanning approach would be undertaken, with the use of design codes and positive consultation with the local community. This would ensure that a suitable and necessary development could be delivered in this part of the Hoo Peninsula.

7. Conclusion:

- 7.1. This representation continues to promote The Depot, to the South of Ratcliffe Highway, Hoo St Werburgh, site HHH41, as a potential site allocation in the Future Medway Local Plan 2040 and on this basis, this representation **supports** the preferred option 'SGO 3' growth option which blends regeneration and greenfield development, specifically with a 'brownfield first' focus, and Medway Council's proposed inclusion of the HHH41 site as a non-strategic site allocation in the MLP.
- 7.2. However, it is considered that HHH41 could be scored more highly in the emerging Sustainability Appraisal. This is because the site is currently a brownfield site, that would be greatly improved if redeveloped and mitigated, specifically with regards to landscaping, biodiversity and habitats.
- 7.3. Furthermore, we object to the proposed affordable housing policy, T3, which requires rates of 30% affordable housing in the Hoo Peninsula. This proposed policy is based on outdated evidence and does not take into account rural brownfield sites, which generally cost more than greenfield sites to be bought forward. It is considered that this approach could be considered in tension with the GO 3 growth option which promotes brownfield first principles for development.



KEY PLAN

Site boundary

1.05 Ha

Proposed residential development
(up to 25 no. dwellings @ 34.25 dph)

C. 0.73 Ha

Proposed Green Infrastructure

c. 0.31 Ha

Existing Trees

Existing Hedgerow

Potential Footway

Existing Public Right of Way

Proposed Vehicular Access

Proposed Roads

Proposed Planting

Indicative Tree on Street Frontage

Proposed Tree Planting

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Project | Ratcliffe Highway
Hoo St Werburgh
Client | Kitesfield Estates Limited
Title | DEVELOPMENT FRAMEWORK
Status | PLANNING

Scale@A3 | 1:1000 Date | AUGUST 24 Drawn | ZS Chk'd | BL

Project Number Drawing Number Revision
24:0075 1001

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By Email

03 September 2024

[REDACTED]
***Response to Medway Local Plan 2041 – Regulation 18 Consultation on behalf of
Gleeson Land
September 2024***

We write on behalf of our client, Gleeson Land, in response to the Council's latest Medway Local Plan Regulation 18 consultation dated July 2024. This consultation builds on those previously undertaken, including the Setting the Direction consultation in October 2023, to now identify the Council's preferred options for growth including potential sites and locations for allocations.

Gleeson Land has land interests adjoining the village of Cliffe, known as "Land east of Buckland Road" (hereafter referred to as the Site, see **Appendix A**). The Site has previously been submitted, by the landowner, to the Council for consideration, identified as Site ID SR6 in the Land Availability Assessment (Sept 2023). This identified the Site should proceed to the next stage of consideration with no overriding constraints identified. It is however not identified as a preferred allocations in the current consultation.

Notwithstanding Gleeson Land's specific land interests, this response has been prepared in objective terms, in response to the current consultation, the questions posed, and the supporting evidence base.

Response to Regulation 18 Consultation

Vision for Medway in 2041

The overarching vision for the emerging Plan seeks to increase the quality of life for residents of the District through meetings its growth needs, in full, including housing,

employment and community facilities, alongside the necessary infrastructure to support this. The Vision aims to create a healthy place to live and work, where communities are connected and located near to services and facilities to meet their day-to-day needs, whilst preserving the character of settlements and the countryside surrounding these.

We support the Vision identified by the Council, which can best be achieved through the adoption of an up-to-date Local Plan.

The Plan is supported by a range of strategic objectives and Spatial Development Strategy which together seek to achieve the Council's vision for the District. These include measures such as providing the variety of homes need to meet demand, delivering new places including open spaces to reduce inequalities in health, strengthening sustainable transport opportunities, preserving important nature and landscape assets, and respecting distinct identities and characteristics of Medway's settlements as they grow.

Whilst the Spatial Development Strategy identifies a priority for regeneration and best use of previously developed land, it accepts that development will be needed in a range of locations across the District in order to meet growth needs in full. This includes, as referenced in the strategy, expansion of suburban neighbourhoods and villages, where the principles of sustainable development can be met.

We also welcome the extension of the Plan period (and Vision) up to 2041, an additional year from the previous Regulation 18 consultation. This reflects the NPPF (para 22) requirement for strategic policies to providing a minimum period of 15-years post adoption. However, noting the Plan is now not likely to be submitted for Examination until 2025, this should continue to be monitored and the Plan period be extended if necessary.

Spatial Growth Options

Following from the potential approaches for accommodating growth needs in previous consultations, the plan now sets out 3no. spatial growth options these being:

- SGO1 – urban focus;
- SGO2 – dispersed growth; and
- SGO3 – blended strategy.

The consultation reflects that a 'urban focus' approach alone is unlikely to meet growth needs in full with only a limited supply of previously developed land available to accommodate this. There are however sensitivities across the District, including important habitats and landscapes, and the Green Belt, which need consideration. Nevertheless, the Council acknowledge that in order to meet the full scale of needs over

the Plan period, complex issues will need to be considered and addressed as part of the development secured, including any mitigation necessary.

The Council identify the blended approach (SGO3) as its preferred strategy for meeting growth needs. We consider this is the right approach, supported by a strong mix of urban, suburban and rural development to deliver the diverse needs of the community. However, as set out below, we consider further housing sites are required beyond that identified by the Council on the policies map at this stage, in order to ensure housing needs are met in full throughout the Plan period

Housing Need

We welcome the Council's acknowledgement that the Standard Method is the correct starting point for considering the housing needs the Plan should be seeking to address across the Plan period. This is correctly identified at the current Standard Method figure of 1,658dpa which reflects average household growth based on the 2014-based household projects and the appropriate market signals uplift (29%).

The Government is currently consulting on a new approach to the standard method for assessing housing need which seeks to increase housing delivery across the Country, in reflection of the current housing affordability crisis. This would, if adopted, result in a slight reduction in requirements to 1,644dpa.

We consider it vital the Council submits a Plan which includes an ambitious, but realistic, strategy for at least meeting housing needs in full (i.e. achieving above 1,644 / 1,658dpa). There is no justified reason for seeking to deliver a lower quantum of growth. We are therefore pleased to see the previous Reg 18 consultation comments questioning the use of the Standard Method and the demographic projections underlying this are no longer included in the current consultation.

Further, Gravesham Council has made a formal request to Medway to help accommodate its unmet housing needs (2,000 homes). The Interim Sustainability Appraisal (June 2024) considers this as a reasonable alternative Growth Option (Section 3) concluding the accommodation of this unmet need alongside meeting Medway's needs in full would have a beneficial effect on the sustainability objective 'Housing' and a negative effect on objectives of 'Landscape and townscape' and 'Natural resources'. This alternative option is rejected on this basis and the Council consider the estimate of unmet need has not been justified by Gravesham (para 3.4.2).

Whilst it will be for Gravesham to respond to the Council's conclusions through ongoing duty to cooperate discussions, there is clear unmet need in the region with a number of

Kent authorities having out-of-date Plans and underdelivering against housing needs, and a significant shortfall in housing delivery across London.

We also question the Council's conclusions in respect of the sustainability objective scores as the options (housing needs and housing needs + Gravesham unmet need) score the same across most of the objectives. As acknowledged, there would be a beneficial effect of delivering more homes, not just for Medway but for the region (i.e. Gravesham) as a whole. This needs to be balanced against the harm which would arise in respect of landscape / townscape and natural resources, which in both cases is noted to be only marginally worse. We consider this needs to be explored further, including identifying potential sites to accommodate the additional housing requirement, before it can be adequately discounted as a reasonable alternative.

Housing Supply

At this stage, despite identifying potential sites and locations for allocations, the Plan does not include specific policies on scale, distribution or phasing of housing. Para 6.1.2 identifies that that will be for the next stage of Local Plan preparation.

Without this information it is difficult to understand how the Council's preferred options will perform against the need to address housing needs in full, and the need to ensure a consistent supply of homes are delivered at all stages of the Plan period (i.e. first 5 years, next 5 years, etc..).

Further evidence is needed to demonstrate the deliverability of those sites proposed for allocation, including ensuring there is no impediment which could delay delivery. This includes, for instance, availability of the Site for development which may not be the case for a number of the urban sites currently identified which are still in active use. Similarly, realistic capacities should be reflected in the assessment of sites, including consideration of policy (national or local) requirements such as biodiversity net gain, public open space provision and ecological or landscape mitigation.

Based on our initial review of the policy maps supporting this consultation and the sites identified, we consider it very likely further sites will be needed to achieve the minimum standard method requirement over the Plan, even without consideration for addressing any unmet need from elsewhere.

It will be important the trajectory of the Plan ensures that housing needs are met at all stages, including in the early years of the Plan. Given the reliance on larger sites, with significant infrastructure requirements, which will deliver later in the plan-period and

beyond this, there should be further small to medium sites identified as allocations to boost housing delivery as soon as practicable.

Policy T11 – Small Site Policy

To aid delivery we welcome the introduction of a positively worded policy (Policy T11) which supports small sites that are well-connected to existing infrastructure provision and would maintain the character and scale of the local area. Given the significance of the housing crisis in Medway, and our comments above and throughout these representations we recommend Policy T11 go further to support housing sites of all scales and sizes in suitable and sustainable locations. This should be on the proviso these are proportionate to the scale of character of an area / settlement including when considering other commitments nearby (including allocations). This will help speed-up delivery of suitable windfall sites across the District, and not unduly constrain these opportunities to address local housing needs, which is clearly the intention of the policy. Our suggested amendments to the policy are as set out below.

Policy T11: ~~Small Sites and SME Housebuilders~~ Windfall Site Policy

The Council seeks to encourage the development of ~~small~~ housing sites that contribute positively to the local community and adhere to sustainable development principles. The Council will support the development of ~~small~~ housing sites in Medway, subject to the following criteria:

- ~~The site must not exceed 60 dwellings (net) in order to maintain the character and scale of the local area.~~*
- The development must be adjoining an existing sustainable settlement and be proportionate to the scale of the settlement, including existing commitments and allocations;*
- Proposed developments must demonstrate a commitment to high quality architectural design that enhances and/or respects the character of the surrounding area;*
- All dwellings must meet or exceed the national and local design guidance to ensure a high quality of living for residents;*
- Proposed developments must not result in an unacceptable level of harm to residential amenity, designated heritage assets, or environmental resources and biodiversity;*

- *Developers must provide adequate measures to mitigate any potential impacts on the local environment, such as landscaping and green infrastructure, and make a clear contribution to mitigation and adaption of climate change;*
- *Small housing sites should be well connected to existing infrastructure, including public transportation and local amenities, to promote sustainable living practices;*
- ~~*The site not part of a larger site unless, through specific proposals to sub-divide a larger site, to speed up delivery of homes and includes SME builders as part of that delivery mechanism.*~~

Land East of Buckland Road, Cliffe

The Site, at Land East of Buckland Road, is located to the south-west of the village of Cliffe on the Hoo Peninsula. It comprises circa. 12.7 hectares of agricultural land currently in use as an orchard. The northern-most part of the Site is located immediately to the west of the rear of the existing residential properties of Symonds Road and the Cliffe Men's Social Club and to the west of the Eternal Lake Nature Reserve on the opposite side of Buckland Road.

To the north of the Site is part of the recently approved (at Appeal) Land to the East and West of Church Street, Cliffe application (ref. MC/22/0254). The parameters and indicative masterplan for that site indicate the neighbouring field to be utilised for semi-natural open space.

The appeal decision for the adjoining site (PINS ref. APP/A2280/W/22/3313673), issued November 2023, provided confirmation that Cliffe is a sustainable village with services and facilities to increase a growing population as well as bus services to larger villages and towns nearby. The Inspector concluded the proposals were wholly suitable for the village, and would provide a plethora of benefits including enhanced sports and community facilities and public open space, alongside provision of market and affordable housing.

It is considered the Site forms a rational option for the continued growth of Cliffe as a sustainable location, complementing the scheme approved to the north.

Vision for the Site

Gleeson is promoting the Site as a suitable and sustainable location for residential development, seeking to bring forward development in accordance with the emerging Local Plan. Gleeson's vision for the Site is developing as design, technical and environmental work is progressed, alongside discussions with the Council, consultees and other stakeholders. However, the intention is to bring forward a new high quality and

sustainable residential development which complements existing development approved around the village, set within a landscape context, achieved through the retention and enhancement of the existing boundary vegetation and ecological features of most value.

Work completed to date, indicates the Site is capable of supporting residential development through provision of a landscape and ecological-led scheme which responds positively to its surroundings.

We consider the Site could support 100 - 110 dwellings (see **Appendix 1**), including policy compliant levels of affordable housing and substantial provision of public open spaces, landscaping and areas for biodiversity net gain. This includes a significant buffer along the western edge of the Site, separating built development from the nearby South Thames Estuary and Marshes SSSI.

Access for all users would be provided onto Higham Road, by way of a new priority access junction and new and enhanced pedestrian facilities, as shown on the appended Potential Access Strategy (**Appendix 2**). This would connect the Site for pedestrians to the existing services and facilities of the village, including bus stops, convenience store, and school, all within a short walking distance.

Whilst work is ongoing, at this stage no significant constraints have been identified which cannot be overcome through good urban, landscape and ecological design and/or standard mitigation.

In light of this, the location and scale of the emerging proposals for the Site, it is envisaged completions would commence on site within the first 5-years post-adoption of the Plan.

We consider the Site is 'suitable', as well as 'available' and 'achievable', and therefore 'deliverable'. It should be adopted by the Council as a proposed site allocation as the Plan process moves forward.

Response to the Interim SA

The Interim Sustainability Appraisal (June 2024) considers the Site, as SR6, against the sustainability objectives and to consider whether the Site be identified as a preferred housing allocation option.

Table 6.4 and 8.13 provide a summary matrix of all reasonable alternative non-strategic sites pre and post-mitigation against the sustainability objectives. In all regards, the Site (SR6) scores the same as Land to the East and West of Church Street, Cliffe (SR51) which

has Outline consent, apart from natural resources where SR6 scores higher and education where SR51 scores higher (albeit SR6 is ‘neutral’ for this objective).

Whilst we agree the Site would perform similarly than SR51, given the proximity of the Site to each other and no known material difference in constraint, we question why SR51 (and by extension SR6) scores negatively on some post-mitigation sustainability objectives (i.e. ecology) when it has been shown, through appeal, to be suitable in this respect.

Further, we do not agree with the conclusions of table E.11.1 (Transport and accessibility) which scores the Site (SR6) negative for accessibility to bus stops, ped / cycle access and local services. This contrasts with the neighbouring SR51 which scores positively for all these. This is discussed further below.

Table 8.15 identifies the Site (SR6) has been rejected due to its “close proximity to SSSI. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services”. We reject this, and consider this wholly inconsistent with the Sustainability Appraisal findings for SR51 (and its Outline consent) which states “The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services”. We respond to these points in turn below:

- Close proximity to SSSI – The emerging proposals for the Site have been informed by expert ecological input to ensure nearby sensitive receptors are properly considered through the design process. This includes provision of a significant circa. 100m buffer between the SSSI and built development to avoid potential for significant negative effects from the proposals. The uses of the buffer area for public open spaces and / or non-publicly accessible spaces will reflect the outcomes of ongoing ecological survey work and engagement with relevant consultees. Subject to mitigation, the proximity to the SSSI should not preclude development being delivered on the Site;
- Loss of BMV agricultural land – Given the scale of the housing needs across the District, it is inevitable that agricultural land will be required to accommodate this. This is accepted by the Council as a negative against sustainability objectives, but nevertheless required. It is clearly not a determinative factor as a number of other sites in agricultural use, including others on the Peninsula have been “selected” as preferred options despite this. Further, the appeal decision for the adjoining SR51 concluded the loss of agricultural land in that instance was not significant and was outweighed by the level of housing need. This is therefore not a factor

which overrides the need for housing and should not result in the Site being rejected;

- Development could lead to coalescence – Given the distance between settlements, a significant gap (circa. 1.2 – 1.5km) would remain even if the Site was developed in full. Distance, alongside intervening vegetation, fields and other uses, including the railway cutting, ensure that there would be no risk of coalescence.
- Beyond reasonable walking distance to current public transport services – From the site's proposed access with Higham Road, a wide range of local amenities and services are accessible within a short walking distance, including the Highlands Park Medical Practice and JS Minimarket, both circa. 8-min walk, and Cliffe Memorial Hall, Cliffe Pre-school and St Helens CofE Primary School, all circa. 10-min walk, thereby reducing the need to have to travel on a daily basis (by a private or public transport vehicle). However, the Site is also accessible to nearby public transport services with existing bus stops circa. 3-min walk from the Site on Church Street. The bus stops are served by a number of services, including the 33/633 which operates on a half hourly basis between Cliffe, Strood and Chatham.

We therefore consider the conclusions of the Interim SA are incorrect for the Site. Instead, these should be consistent with the neighbouring site (Land to the East and West of Church Street, Cliffe (SR51)) and the Site considered further as a suitable location for allocation for residential development.

Summary and Next Steps

As set out in these Representations we support the Council's ambitions to meet housing and other needs in full through the preparation of a new Local Plan. We consider this is best achieved through supporting growth in a range of locations across the District, including in the urban, suburban and rural areas. We therefore consider the 'blended approach' advocated to be the correct one.

However, whilst the Council has correctly identified the Standard Method as the minimum starting point for housing requirements. We consider further work will be necessary to ensure the reasonable alternative of housing needs plus Gravesham's unmet need is properly tested.

Further, we are concerned at this stage that not enough housing sites have been identified by the Council to address the housing requirement (even without consideration of any unmet need). The Council should ensure the next stage of consultation includes

sufficient information to properly consider this, including site specific trajectories and conclusions on deliverability.

We consider that additional small to medium sites are likely to be required to meet housing needs in full, and ensure housing needs are addressed as early as possible in the Plan-period. Sites like Land East of Buckland Road, Cliffe, should be considered further as part of the Plan making process, including looking for positive ways to address previous reasons for discounting these.

As set out above, we consider the Site at Land East of Buckland Road represents a suitable and sustainable location for residential development capable of delivering up to 110 homes. The rationale for discounting this Site as part of the Interim SA process is inconsistent with the conclusions of the neighbouring Land to the East and West of Church Street, Cliffe (SR51) site also benefits from Outline planning consent.

We look forward to discussing this further with the Council in due course, and are happy to provide any further information which may assist in the Council's ongoing consideration of the Site as part of this Plan-making process.

Yours Sincerely

Joshua Mellor
Planning Director




Appendix 1

Land east of Buckland Road, Cliffe

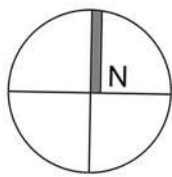
Emerging Masterplan



Key

Site Boundary (12.7 Ha)

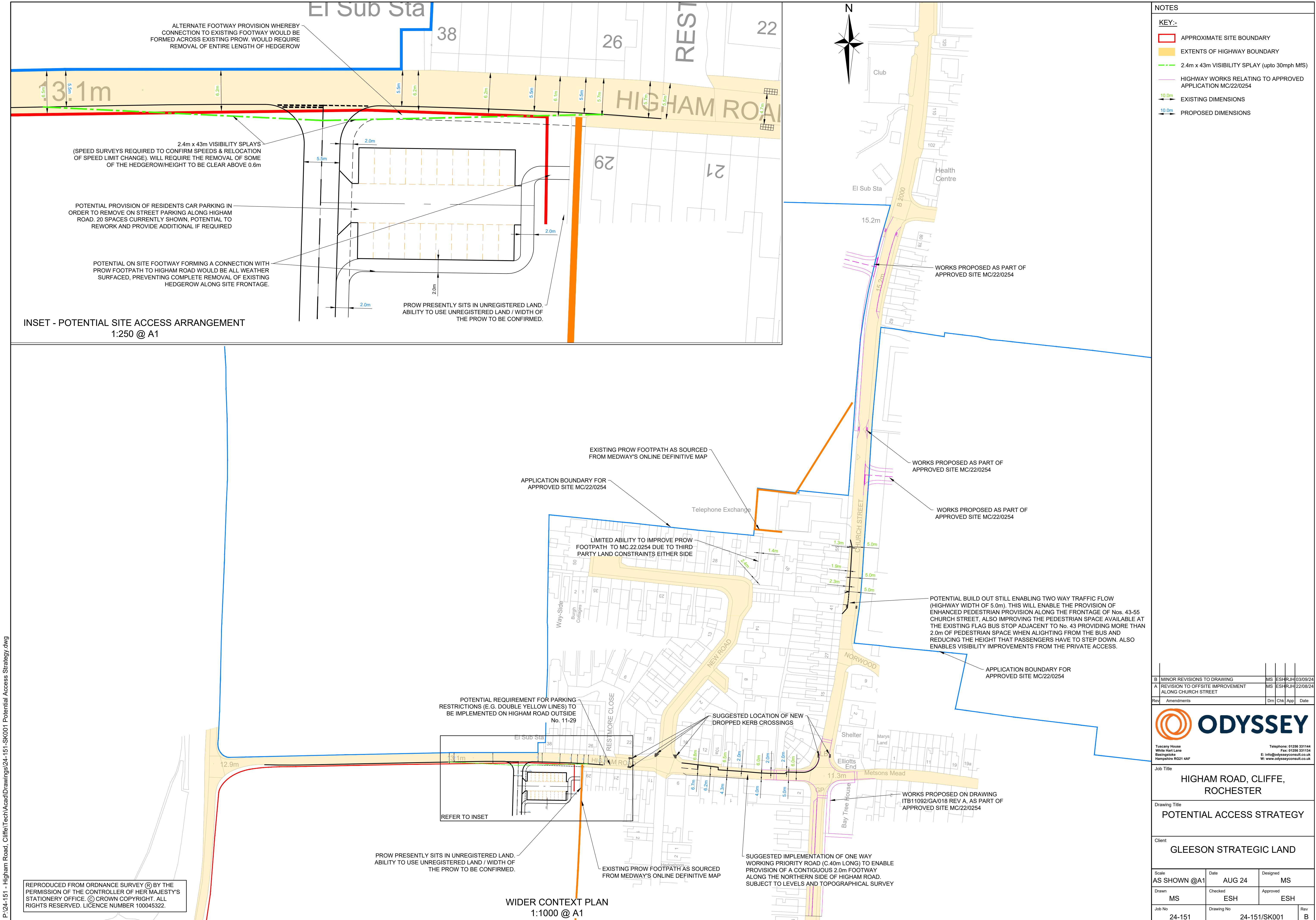
PROW



Appendix 2

Land east of Buckland Road, Cliffe

Potential Access Strategy



- NOTES
- KEY:-
- APPROXIMATE SITE BOUNDARY
 - EXTENTS OF HIGHWAY BOUNDARY
 - 2.4m x 43m VISIBILITY SPLAY (upto 30mph MFS)
 - HIGHWAY WORKS RELATING TO APPROVED APPLICATION MC/22/0254
 - EXISTING DIMENSIONS
 - PROPOSED DIMENSIONS

B	MINOR REVISIONS TO DRAWING	MS	ESH	RJH	03/09/24
A	REVISION TO OFFSITE IMPROVEMENT ALONG CHURCH STREET	MS	ESH	RJH	22/08/24
Rev	Amendments	Dm	Chk	App	Date

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Job Title HIGHAM ROAD, CLIFFE, ROCHESTER					
Drawing Title POTENTIAL ACCESS STRATEGY					
Client GLEESON STRATEGIC LAND					
Scale AS SHOWN @A1	Date AUG 24	Designed MS			
Drawn MS	Checked ESH	Approved ESH			
Job No 24-151	Drawing No 24-151/SK001	Rev B			



SEPTEMBER
2024

Representations to the Regulation 18 Consultation 2024 – Medway District Draft Local Plan

Land North of Rede Court, Strood

Iceni Projects Limited on behalf of
Barratt David Wilson Homes

September 2024

Iceni Projects

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ICENI PROJECTS LIMITED
ON BEHALF OF BARRATT
DAVID WILSON HOMES

Representations to the Regulation 18
Consultation 2024 – Medway District
Draft Local Plan
LAND NORTH OF REDE COURT, STROOD

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1. EXECUTIVE SUMMARY

- 1.1 BDW control the land known as 'Land North of Rede Court, Strood' ("the Site"), which lies in northern Strood, on the District's boundary with Gravesham Borough Council, as shown in the submitted Vision Document. The Site is approximately 16.3Ha and currently comprises an agricultural field that sits directly adjacent to the settlement boundary of Strood.
- 1.2 BDW welcomes the Council's commitment to continuing to progress with a new Local Plan, recognising the importance of a plan-led system. Following on from BDW's previous submissions to the Council, we maintain concerns regarding the preferred spatial strategy including the deliverability of the preferred spatial growth option in its current form, and its ability to respond to the identified key challenges facing the District. In particular, we have serious concerns regarding the draft allocated sites in the preferred spatial growth option and their cumulative ability to;
- enable short term housing delivery and maintain a five-year housing land supply across the plan period, particularly the early years of the plan period;
 - unlock sufficient affordable housing for the District; and
 - deliver development that provides the ability for residents to adopt highly sustainable and healthy living and working patterns that respond to the climate emergency and reduce the use of the private car
- 1.3 The above issues are critical to meeting the strategic objectives identified at 2.2 of the Regulation 18 Plan, which BDW strongly support. It is BDW's view that the preferred spatial growth option must be refined to include BDW's land at North Strood, given its ability both in isolation and in tandem with adjoining land to strongly enhance the Plan and make significant contributions to meeting the strategic objectives.
- 1.4 Medway has a limited amount of Green Belt and other spatial options must be examined before exceptional circumstances exist to review the Green Belt in accordance with national policy. However, it is evident from the preferred spatial option presented that exceptional circumstances clearly do exist to justify identifying BDW's land in the Green Belt at North Strood. In this regard, there are the failings of the preferred spatial growth option as identified above and also the ability of the Green Belt at north Strood to both make the Plan "sound", and to make a far greater contribution to the District's strategic objectives.
- 1.5 As set out in our previous representation, whilst BDW's landholding is currently designated Green Belt, it is important to understand that the context of the Site is significantly changing, with the

adjoining land to the north being draft allocated and removed from the Green Belt in Gravesham Borough Council Regulation 18 Local Plan. Gravesham has a badly out of date Plan, a tightly drawn Green Belt with limited previously developed land, and a housing target that makes it inconceivable to achieve without a significant Green Belt review. The Borough has identified land at North Strood within Gravesham District as the Borough's largest and single most important development allocation. The practical effect of this allocation would be to surround BDW's land with residential development to the north and west (proposed allocation) and south of the Site (existing development) and completely undermine the purpose and aims of retaining BDW's land within the Green Belt in this location, leaving the Site "orphaned" and making no limited contribution to Green Belt purposes.

- 1.6 In this scenario, BDW's land would clearly amount to Grey Belt, the Government's proposed new land use classification in the NPPF. A Green Belt Appraisal, prepared by Icen Projects, is attached to this representation which should be used to inform the Plan. It considers Medway's Green Belt parcels and concludes that BDW's land at north Strood is the most suitable land to release in the District. It also demonstrates that in a scenario where Gravesham and Medway remove land to the south of the A289 to create a new permanent defensible Green Belt boundary in this location, that the function and purposes of the Green Belt can be maintained between Strood and Higham.
- 1.7 Given the Site is in a highly sustainable location, allocating it for development will make a significant contribution towards meeting Medway District Council's housing needs over the Local Plan period to 2041, particularly in the short term. Proposed changes to national planning policy require land previously designated Green Belt to secure at least 50% affordable housing including an appropriate proportion of Social Rent subject to viability, necessary improvements to local or national infrastructure and the provision of new, or improvements to existing, green spaces that are accessible to the public. These requirements ratchet up the amount of affordable housing from land designated Green Belt above that of greenfield land. More significantly, they ratchet up the likely affordable housing yield way in excess of that likely to be delivered through the District's challenging brownfield sites, which frequently carry significant abnormal costs that are likely to weigh down the ability to secure significant affordable housing commitments.
- 1.8 This representation is accompanied by a Vision Document which profiles how the Site can deliver high quality, integrated and sustainable development either in isolation or as the first phase of a much wider urban extension at north Strood comprising the land to the draft allocation within Gravesham and the land being promoted on the opposite (eastern) side of Gravesend Road. This demonstrates how the land can elevate the ability of the strategic objectives set out in the Plan to be met and demonstrates how the local and national infrastructure contributions and creation of new publicly accessible green infrastructure could be met. It also profiles how a large number of homes in this location can be delivered in such a way as to connect people to new and existing commuting routes to sustain highly sustainable travel behaviours and achieve a high modal split.

-
- 1.9 In terms of housing delivery, BDW's land could be brought forward for development immediately at the start of the plan period, making significant social, economic and environmental contributions immediately by unlocking affordable and market housing, potentially as the first phase of a major urban extension of North Strood. It is therefore considered necessary and entirely appropriate to amend the Green Belt in this location, create a new defensible long-term boundary and allocate the land for residential development and this should be reflected in a revised spatial growth option in the next iteration of the Local Plan.

2. RELEVANT BACKGROUND

Barratt David Wilson

- 2.1 Barrat David Wilson Homes (hereafter known as 'BDW') are promoting the Land North of Rede Court, Strood known as Chapter Views. BDW is the nation's leading housebuilder, building the highest quality homes in places people aspire to live. BDW's quality homes are recognised by their House Building Federation 5 Star customer rating, the only major housebuilder to have achieved this for the fifteen consecutive year. BDW is part of three consumer brands alongside Barratt Homes and Barratt London, all focusing on delivering a variety of properties across the UK. Barratt Developments plc has over 60 years of experience in which the company has built more than 450,000 homes across the UK.
- 2.2 BDW aims to lead, innovate and apply best practice in the housebuilding industry by putting its customers first, build great places where people aspire to live, enhance local communities, deliver high quality homes that embrace best new methods of construction and invest in its people. In 2023, 100% of Barrett Developments actively contributed to community infrastructure. Delivering green open spaces that support healthy lifestyles and bring communities together is something BDW have a strong track record of, as well as delivering sustainable and attractive developments.

Site Background

- 2.3 The Site promoted by Barratt David Wilson comprises circa 16.3Ha of land in northern Strood bordering the Gravesham Borough Council boundary. The Site reference in the Council's 2023 Land Availability Assessment Interim Report is 'SNF1 – Rede Court, Gravesend Road'. A Location Plan is provided in the attached Vision Document. The Site is currently undeveloped and is designated Green Belt land. It comprises agricultural land that is relatively flat but rises in the north east where it meets Gravesend Road. Whilst the Site is relatively unconstrained, a water main and CLH Pipeline System are located underground in the southern part of the Site, but this can be factored into the design and layout of any proposed development.
- 2.4 The Site is bordered by development to the south which forms part of the Strood urban area. Its character is influenced by this adjoining urban townscape to the south and presence of the A289 to the north. Although the Site currently sits outside the built-up area settlement boundary of Strood, it is located approximately 1.5km (20-minute walk) from the amenities of Strood Town Centre. The Site is therefore in a highly sustainable location.

Access and Highways

- 2.5 Access to the site is currently provided from a farm track leading westwards from Gravesham Road. There is no public access and there are no Public Rights of Way in proximity to the Site.

2.6 Access to the Site can easily be achieved from Clinton Avenue and Beaufort Road. Access could also be achieved from Carisbrooke Road and Gravesend Road. There are bus stops located on Rede Court Road that provide services into Strood, Chatham and Hoo. Strood train station also provides more strategic travel options with services to London St Pancras International in 34 minutes and London Bridge in 1 hour 13 minutes. Rochester train station also provides services to London Victoria in 46 minutes. The Site is well located for residents to travel to a wide range of facilities using sustainable modes of transport.

2.7 The A2 (Watling Street) 250m to the south of the Site has a segregated cycle lane which runs towards Stood town centre.

Environmental

2.8 The Environmental Agency's Flood Risk Map for Planning shows that the site is located in Flood Zone 1, meaning it has the lowest probability of flooding.

2.9 The Site is dominated by rough agricultural farmland of Grade 2 Classification. There are no statutory designations in relation to ecology located within the boundaries of the Site and there are no other known environmental constraints. There are no TPOs identified on the Site.

2.10 Great Crabbles Wood Site of Special Scientific Interest (SSSI) is located north west of the Site, Cobham Woods SSSI is located south west, with Rede Common Local Nature Reserve (LNR) to the south.

Heritage

2.11 Within the red line boundary of the Site, there are no known archaeological or built heritage assets. The Site is not within or in the vicinity of a Conservation Area.

2.12 The Little Hermitage is a Grade II Listed Georgian Building dated from the early 18th Century. It is located north of the Site on Gravesend Road and is currently in use as a wedding and functions venue. The enclosed nature of the Site and the separation of Gravesend Road mean that the heritage asset and its setting is not appreciable from the Site.

Sustainability

2.13 The Site is located in northern Strood and would represent a logical extension of residential development of the urban area, emphasising this location is already a highly suitable location for future development. This Site offers a logical opportunity to extend the existing residential estate and deliver a new significant scale of dwellings, particularly of family housing, that can be delivered on a small to medium site in a short timeframe, crucial within the first five years of the Plan period.

Emerging NPPF and Proposed Planning Reforms

- 2.17 It is recognised that the publication of the revised National Planning Policy Framework (“NPPF”) for consultation has coincided with the publication of this Regulation 18 consultation. However, it is still important for the Council to progress with producing a new plan and we would urge the Council to ensure that the potential changes to the NPPF do not cause delays to this process.
- 2.18 The key changes to the NPPF include a clear emphasis to deliver significantly greater numbers of new homes, recognising the issues in the market compounded by an historic undersupply and the ability of the housebuilding industry to make a substantial contribution to boosting economic growth.
- 2.19 The Standard Method to calculating Local Housing Need (“LHN”) is also proposed to change. Whilst the change for Medway is minimal (with the LHN decreasing slightly from 1,658 dwellings per annum (“dpa”) to 1,644dpa), the impact of the changes on the four adjoining districts to Medway is much more significant:

Area	Housing Need	Previous SM Figure	% Change	Previous Local Plan figure	Difference	% Change
Gravesham	693	661	+5%	363	330	91%
Maidstone	1344	1220	+10%	883	461	52%
Swale	1061	1040	+2%	776	285	37%
Tonbridge	1057	820	+29%	425	632	149%

Figure 1: Local Housing Need for adjoining districts.

- 2.20 The Government is clear that the starting point for local authorities is to meet the LHN in full. The Duty to Cooperate is maintained and the necessity for Districts to work together to ensure that growth requirements are met across housing market areas is, if anything, strengthened and enforced. The NPPF is clear that local authorities will be required to review Green Belt boundaries in order to meet this need, if sufficient land cannot be found outside it.
- 2.21 Another significant proposed change is the introduction of the “grey belt”, which would allow development to come forward more easily on land currently designated as Green Belt which comprises previously developed land or land which makes a limited contribution to the purposes of the Green Belt. Whilst the definition of Grey Belt will not be established until the final version of the

Framework is published (this is scheduled for November 2024), BDW's landholding will clearly amount to Grey Belt in a scenario that Gravesham's draft allocation at North Strood continues to exist and is strengthened through its Plan Review.

- 2.22 Irrespective of whether BDW's land is brought forward as future Grey Belt land or identified for development through a future iteration of the Local Plan, the revised NPPF is clear that land previously designated Green Belt will need to be delivering at least 50% affordable housing including an appropriate amount of Social Rent subject to viability, necessary improvements to local or national infrastructure and the provision of new, or improvements to existing, green spaces that are accessible to the public.
- 2.23 In terms of plan-making, the Government has stated that all local authorities should have a plan submitted for examination by December 2026. Medway is currently on track to meet this deadline, however, it is essential that progress is maintained to meet or precede this deadline in order to realise the benefits of a plan-led system.
- 2.24 Based on the text within the consultation version of the NPPF, the Council will need to prepare its plan under the new NPPF unless the Regulation 19 version of the Local Plan is published within one month of the new NPPF being published.
- 2.25 On 30 July 2024, the Housing Minister, Matthew Pennycook MP wrote to the Planning Inspectorate regarding the necessity for local plans to be sound prior to submission, limiting the extent to which plans can be 'fixed' during the examination process.
- 2.26 Principally, he states that "pragmatism" should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall.
- 2.27 This means that deficient plans which cannot easily be fixed at examination may be found unsound. Therefore, it is imperative that Medway's emerging Local Plan meets the tests of soundness ahead of submission to the Secretary of State and this representation has been submitted to aid the Council in achieving this requirement.

3. CONSULTATION QUESTIONS

- 3.1 The Council has used an online consultation format for representors to make comments on the emerging Local Plan. This section follows the format used on the Council's website and the comments have been submitted separately on the consultation portal under the relevant section.

Section 2.1 – Vision for Medway 2041

- 3.2 Overall, BDW is supportive of the Vision for Medway 2041. However, there are questions as to whether chosen spatial strategy will assist deliver this vision.
- 3.3 Firstly, the Council's Local Development Scheme states that the Council anticipates that the Plan will be adopted towards the Autumn of 2026. Paragraph 22 of the NPPF requires local plans to look forward a minimum of 15 years from the point of adoption. Given the potential for slippage in the examination of the emerging Local Plan and that the Council does not consider that it would be likely that the Plan is adopted until late 2026, **the Plan period is slightly less than 15 years and should be extended to 2042 in order to be consistent with national policy and be considered positively prepared.**
- 3.4 Secondly, the Vision makes reference to the desire to strengthen Medway's position economically within the wider region. This is line with the emphasis on economic growth within the emerging NPPF and the significant contribution of housebuilding to the economy. It is important that the emerging Local Plan recognises the contribution of housebuilding to the economy, through the jobs created during the construction period, directly and indirectly, the jobs created through associated infrastructure and ensuring that Medway is attractive to the workforce by delivering appropriate and affordable housing.
- 3.5 The emerging Local Plan should firstly plan for aspirational growth in terms of overall housing delivery and secondly through delivering a range of typologies and tenures through a portfolio of sites which will maintain the delivery of a five-year housing land supply upon adoption. The Site can assist in delivering this aspirational growth through early delivery of a substantial number any range of homes. **The spatial strategy should, therefore, take a growth-led approach to help realise this element of the Vision.**
- 3.6 Thirdly, the Vision sets out that all sectors and ages of the community will, by 2041, be able to find decent places to live. In order to deliver this aspiration, the Council will need to ensure that a range of sites are allocated within the emerging Local Plan, with a sufficient number of homes to help delivery the choice required. Key to this will be the delivery of family homes.

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- 3.7 Land North of Rede Court, Strood, will assist the Council in delivering its Vision. The Site has the ability to provide a range of home sizes, tenures and types early on in the Plan period, which will help ensure Medway is attractive to those looking for jobs in the District, strengthening the economy. The Site also has the ability to deliver new energy efficient homes, contributing to the aspiration for reducing carbon emissions. Development on the Site will not cause harm to any local or cultural assets and will contribute towards successful place-making. The Site is in a sustainable location, contributing to the vision for improved travel choices, encouraging the use of active travel and public transport.

Section 2.2 – Strategic Objectives

- 3.8 The Council has set out its strategic objectives at Section 2.2 of the Local Plan which feed into the Vision and are grouped into four sections: *“Prepared for a sustainable and green future”*; *“Supporting people to lead healthy lives and strengthening our communities”*; *“Securing jobs and developing skills for a competitive economy”*; and *“Boost pride in Medway through quality and resilient development”*.
- 3.9 Similarly, BDW is broadly supportive of the overall objectives set out in the emerging Local Plan. There are significant questions, however, as to how the Plan aligns with these objectives. The spatial strategy as currently written, does not assist in developing a competitive economy or strengthening communities. As set out in detail later within these representations, the spatial strategy is not positively prepared, evidenced, justified or consistent with national policy, as required by the NPPF.

Section 2.3 – Spatial development strategy

- 3.10 The spatial development strategy set out within Section 2.3 of the Plan states that it prioritises regeneration, making best use of previously developed land and directing investment into urban waterfront and centre opportunity areas. Whilst BDW is not unsupportive of this strategy in principle, there are significant issues in terms of the deliverability of this strategy and how this achieves mixed and balanced communities and is in line with Vision. In particular, the strategy notes that Chatham is an important focus for urban regeneration and there are significant concerns over deliverability in this location.
- 3.11 The Plan states that the spatial strategy provides for a range of development needs through growth in urban, suburban and rural areas. **BDW do not agree with this statement and have fundamental concerns as to how the spatial strategy will deliver the required mix of homes throughout the plan period, given that urban brownfield sites tend to primarily deliver smaller, flatted development.**
- 3.12 Outside of the urban regeneration areas, the Plan states that the Council will support the expansion of identified suburban neighbourhoods and villages, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.

North of Strood has been excluded as an area of expansion, despite this location meeting the principles of sustainable development supported in the spatial development strategy.

- 3.13 Lastly, the Plan notes that the function and extent of the metropolitan Green Belt in Medway will be retained, and the Council will ensure that substantial weight is given to the potential for any harm when considering development proposals in the Green Belt. **BDW disagree with this approach and consider that exceptional circumstances which require land to be released from the Green Belt clearly exist.**

- 3.14 Overall, it is not considered that the Plan and accompanying evidence base can be considered sound. More detailed comments on the soundness of the spatial development strategy are considered later on in these representations.

Section 3.2 – Preferred spatial growth option

- 3.15 **BDW does not agree with the Council's preferred spatial growth option and fears it will fail the tests of soundness set out under paragraph 35 of the NPPF (December 2023).**

- 3.16 As set out previously within these representations, the Plan period should be extended to 2042 and land for a minimum of 1,658 additional dwellings be sought, with the overall need increasing to 28,186 dwellings across the plan period. The preferred spatial growth option must ensure that this quantum of housing can be actually delivered in the plan period. This is likely to necessitate those sites where there are uncertainties over delivery within the plan period to be identified as having the potential to be brought forward within the plan period, but not as committed numbers in the delivery pipeline. At present, it is not apparent that the Council has undertaken the research necessary to determine the capacity of the chosen sites and whether the spatial strategy can deliver the number of homes suggested.

Reasonable alternatives

Housing target

- 3.17 Notwithstanding the above, the Regulation 18 Interim Sustainability Appraisal Report (June 2024) which accompanies this consultation only considers two "reasonable alternatives". Option 1 meets Medway's Local Housing Need and Initial Objective Assessment of Employment of 22,643 homes and 274,663sqm of employment land across the plan period. Option 2 delivers the same level of employment land and 2,000 additional homes of Gravesham's Unmet Housing Need.
- 3.18 The Planning Practice Guidance (PPG) states that sustainability appraisals are integral to the preparation and development of local plans. Paragraph 11-018-20140306 of the PPG requires

reasonable alternatives to be “sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made”.

- 3.19 The two options assessed in the Sustainability Appraisal are not considered to encompass all reasonable alternatives which should be assessed, nor are they sufficiently distinct. Option 2 does not assess a different level of employment land provision to Option 1 and includes only an 8.8% increase in housing numbers based on neighbouring unmet need.
- 3.20 Option 1 is stated as being chosen due to it placing less pressure on transport, social infrastructure and lesser impacts on the environment. Option 2 would deliver only an additional 2,000 homes across a 16-year plan period, a marginal increase. The Sustainability Appraisal does not adequately consider the ability of development to mitigate these impacts nor the ability of development to make a positive contribution to infrastructure which goes beyond benefits to new residents but also to existing communities. Neither does it propose an alternative level of employment land provision.
- 3.21 When taking into account the anticipated supply of housing from windfalls and extant planning permissions, the Council is proposing a total supply of 27,854 across the plan period until 2041. This allows just under a 5% buffer to allow for market flexibility. Notwithstanding our belief that the plan period should be extended to 2042, it is not considered that this allows for a sufficient buffer in the event of delays to the delivery of strategic sites, or those impacted by viability. **The housing target proposed in the emerging Plan should therefore allow for a higher buffer of between 10% and 20% more homes. In order to be positively prepared and justified, the Council should, as a minimum, account for this within the reasonable alternatives.**
- 3.22 Further, in order to be positively prepared and justified, the Sustainability Appraisal should consider a more ambitious higher growth scenario which will contribute towards the Council's Vision of strengthening the District's economic position regionally as well as increasing housing choice for mixed and balanced communities.
- 3.23 Therefore, in order for the emerging Plan to be considered sound, **the Council should revise the Sustainability Appraisal to consider and assess an option with a sufficient buffer and also additional reasonable alternatives which achieve more ambitious levels of growth.**

Employment driven housing need

- 3.24 The level of employment land assessed under both reasonable alternatives has not been adequately evidenced, nor is it justified. The Sustainability Appraisal refers to an Initial Objective Assessment of 274,663sqm of employment land. However, the Council has not published any evidence as part of this consultation which would indicate where this assessment of need has come from.

- 3.25 The Employment Land Need Assessment – Update (October 2020) notes a need for 293,112sqm of employment floorspace, higher than the level tested in the Sustainability Appraisal under Options 1 and 2. This Need Assessment notes that historic growth in manufacturing indicates considerable potential for future growth and diversification. Similarly, logistics and distribution are identified as a strong growth area given Medway’s geographical positioning with access to a considerable population. Further, the Lower Thames Crossing (which is due to be determined by 4 October 2024) is noted as having the potential to provide a significant new driver to the local market.
- 3.26 The all points to the ability of Medway to realise the vision of strengthening itself as being regionally important economically. However, as set out in paragraph 7.2.1 of the Regulation 18 Local Plan, the Council admits that it has not carried out the necessary evidence gathering to determine the employment needs of the District. This information is critical to determining whether the emerging Plan is firstly delivering the levels of housing growth which can support economic growth, and secondly, whether the spatial strategy, through allocating existing employment land for housing, is jeopardising economic growth.
- 3.27 Without this information, the Sustainability Appraisal cannot be considered to be positively prepared, justified, evidenced or consistent with national policy.

Unmet need from neighbouring authorities

- 3.28 Historically, local authorities in Kent have agreed not to take need from other neighbouring authorities, with need to be met within each local authority area. However, this has caused issues with inspectors at examination (for example, Sevenoaks). Whilst Medway’s housing need under the revised LHN has decreased marginally, neighbouring authorities have seen increases in their LHN and, when compared with current deliver rates, these authorities will struggle to deliver their need without cross-boundary collaboration.

Local Authority	Existing LHN	New LHN	Current delivery
Gravesham	661dpa	693dpa	363dpa
Maidstone	1,220dpa	1,344dpa	1,379dpa
Swale	1,040dpa	1,061dpa	900dpa
Tonbridge & Malling	820dpa	1,057dpa	446dpa

Figure 2: Table showing the existing and revised local housing need of neighbouring authorities against current delivery.

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- 3.47 Whilst it is not clear what the most up to date figure for Gravesham's unmet need is, given that there is no statement of the Duty to Cooperate nor a Statement of Common Ground with Gravesham, it is clear that Gravesham is a heavily constrained borough and the SA has already considered a scenario where Medway can assist in accommodating some of this unmet need.
- 3.48 Tonbridge and Malling Borough Council is in the process of preparing a new local plan and is a borough which is constrained by the Green Belt and the Kent Down National Landscape. Tonbridge and Malling's housing need is set to increase significantly, by nearly 450dpa through the revised Standard Method. As such, the Council will need to engage with Tonbridge and Malling to determine whether these needs can be accommodated within Tonbridge and Malling, or if Medway can assist in meeting any unmet needs.
- 3.49 The Government is clear that local planning authorities need to work together in a productive and pro-active way to ensure that housing need is met in full within regions. Therefore, Medway will need to engage meaningfully with neighbouring authorities, including Gravesham, to take any unmet need. This should be reflected in the next iteration of the Sustainability Appraisal and emerging Plan. The Council should update the Sustainability Appraisal to consider a wider range of growth options, including higher levels of housing delivery.

Spatial Growth Options

- 3.50 The Sustainability Appraisal then goes on to set out 12 "spatial delivery options" and from these, three spatial growth options have been formed.
- 3.51 "*SGO1 - Urban Focus*" seeks to maximise development on brownfield sites in urban centres and waterfront sites through increased density. The Council acknowledges that there are not enough brownfield sites to deliver against the LHN and, therefore, limited greenfield development adjoining larger settlements has been considered, including Strood, Rainham, Lordswood and Hoo.
- 3.52 The Council considers that this option raises issues with conflicts with design guidance such as the Chatham Design Code and the negative impacts of high-density development on heritage assets.
- 3.53 One of the areas for housing growth is the redevelopment of existing employment sites at Chatham Docks and areas of Medway City Estate. However, it is noted that there are potential issues with viability on brownfield sites and reliance would limit range of housing types to meet needs, including delivering family homes.
- 3.54 "*SGO2 - Dispersed Growth*" allocates more limited land through regeneration and excludes Chatham Dock and some town centre/waterfront opportunity sites as they have not been actively promoted.

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- 3.55 Instead, this option proposes a higher release of greenfield and Green Belt sites including Hoo Peninsula, North of Rainham, Medway Valley and sites close to sensitive environmental areas. The Council highlights that this creates sustainability issues through a higher reliance on car-based transport and greater loss of good quality farmland.
- 3.56 “SG03 - *Blended Strategy*” is the preferred option presented by the Council as it blends land for regeneration and greenfield development. The Council state that this option will deliver a brownfield first focus with regeneration in urban centres and waterfront locations and range of sites in suburban and rural areas. Half of development is proposed to take place on brownfield land.
- 3.57 The Council state that this will deliver a range of housing types and densities, with heights in regeneration areas able to reflect design guidance and heritage constraints.
- 3.58 Whilst BDW does not disagree with the principle of the chosen strategy of a “blended” approach, there are a number of significant concerns which call into question whether the spatial strategy has been positively prepared, is justified and effective, and consistent with national policy.
- 3.59 The Council has acknowledged that there are not enough brownfield sites to deliver the number of homes required in the Plan period and there is a requirement for some greenfield land to be released. Further, **the Council acknowledges that overreliance on brownfield sites can negatively impact the range of homes delivered due to land constraints and viability concerns. BDW agrees.**
- 3.60 Spatial Growth Option SGO1 is noted as the redevelopment of existing employment sites at Chatham Docks and Medway City Estate. At Table 5.1 of the Sustainability Appraisal, we can see that development in these locations is also proposed for the preferred Spatial Growth Option SGO3. It is unclear how the redevelopment of existing employment sites helps contribute towards the Council’s Vision of strengthening Medway’s position economically in the region and also the delivery of employment land as set out under Option 1 of the Sustainability Appraisal.
- 3.61 In addition, without having prepared an up-to-date Employment Land Need Assessment, the Council does not know how much land it needs for employment uses and how the allocation of existing employment sites for residential development will impact this.
- 3.62 Spatial Growth Option SGO2 also notes that Chatham Docks and some town centre and waterfront opportunity sites have been excluded due to the sites not being actively promoted. Notwithstanding this, Chatham Docks and all Urban sites are included in the preferred option SGO3.
- 3.63 The NPPF at Annex 2, states that for sites to be considered deliverable (i.e. brought forward within five years), the site should be available for housing now. For sites to be considered developable (i.e.

beyond five years and within the plan period), there should be a reasonable prospect that the site will be available.

- 3.64 Tables 8.14 and 8.15 of the Sustainability Appraisal provide a list of development sites and the reasons why they have been selected or rejected as part of the development strategy. When comparing this with the October 2023 Land Availability Assessment (“LAA”) Interim Report, there are a significant number of sites selected for development which are either not in the LAA or have not submitted for consideration as part of the Call for Sites.
- 3.65 Without publishing an update to the October 2023 LAA, it is not possible to fully interrogate the site selection as part of the chosen spatial strategy to determine whether they are available. In addition, without a housing trajectory, it is not possible to determine whether the Council can maintain a rolling five-year housing land supply and the deliverability of individual sites. Further, without evidence to the contrary (and as alluded to by the Council itself), a large number of sites cannot be considered available and suggests that the chosen spatial strategy is not deliverable, effective or positively prepared.
- 3.66 The Council has also not provided any detailed information which underpins the capacity of the brownfield sites chosen as part of the spatial strategy. Without this, it is not possible to determine whether the estimates of housing numbers can be considered accurate or sound.
- 3.67 In addition, a large proportion of the sites set out in tables 8.14 and 8.15 are noted in the October 2023 LAA as having extant planning permission. It is not clear whether these sites should be considered as being commitments rather than allocations and included within the 5,363 homes of existing supply commitments and anticipated windfall supply set out at paragraph 3.2.1 of the Sustainability Appraisal, or within the required yield of 22,491 homes. If they are to be considered as allocations, then there are questions as to why these sites have not already come forward for development if they benefit from planning permission. In order for the Plan to be considered positively prepared, effective, justified and consistent with national policy, this should be clarified and further evidence produced which allows for sufficient interrogation of the sites selected.

Housing Trajectory, Deliverability and Supply

- 3.68 As previously noted, the Council needs to produce a detailed housing trajectory of all the sites chosen for allocation in order for them to be scrutinised sufficiently to be considered sound. This detail needs to be provided in order to determine whether the Council will have a five-year housing land supply upon adoption of the Local Plan, and can maintain this throughout the plan period.
- 3.69 This is crucial given the Council’s historic record of delivery and supply. The most recent Housing Delivery Test results (published December 2023) show that the Council is only delivering 79% against its current need. Whilst this is up from the previous monitoring years, it shows persistent

issues with delivery within Medway. The Council's Acton Plan (June 2024) predicts that the Council will not pass the Housing Delivery Test before the adoption of the emerging Local Plan.

- 3.70 This is particularly pertinent given that the Council's latest published housing land supply shows that as of 31 March 2023, the Council can only demonstrate 3.3 years of housing land supply. Further, the housing trajectory contained within the 2023 Authority Monitoring Report ("AMR") at page 32, shows a significant tailing off in housing delivery post 2026/27.
- 3.71 The Council's Housing Action Plan (June 2024) notes that a third of the land within Medway is designated as international or national importance for the environment, which presents a significant constraint on development. In addition, it notes that development on brownfield sites has taken longer to build out.
- 3.72 At paragraph 2.10, it states that there has been a notable decrease in permissions granted, with only two sites over 100 dwellings being permitted in the monitoring year 2022/23 and that this trend is expected to continue in 2023/24. This will mean that delivery rates are likely to also decrease without consenting sites which can deliver early on in the plan period.
- 3.73 Perhaps indicative of the issues Medway has had with building on brownfield sites are St Mary's Island which was first identified back in 1988 and planning permission granted in 1996. A total of 1,629 homes out of the 1,760 consented homes were completed by March 2021. Similarly, Rochester Riverside was also identified in 1988, with just 73 units built in 2012. The remainder of the 1,473 homes could take 20 years to build out.
- 3.74 Despite the incredible amount of time that these two sites have taken to come forward with new homes, the Action Plan at paragraph 3.48 notes that the Council plans to allocate additional sites of similar size through the emerging Local Plan. This raises significant concerns about the selection of brownfield land for housing delivery within the early stages of the plan period to address the chronic housing delivery and supply issues which Medway faces. As noted previously, the Council has not presented any detailed evidence which sets out the capacity of these brownfield sites, clearly showing the constraints and how these constraints are to be overcome in order to deliver homes consistently across the plan period. Without this information, the Plan cannot be considered sound.

Viability

- 3.75 The Viability Assessment published as part of this consultation has not been updated since 2021 and is based on a version of the emerging Local Plan which was not published. The Council notes in the explanatory note, that the policies contained within this Plan are very different to what is being consulted on as part of this Regulation 18 consultation.

3.76 The information within this Viability Assessment has very limited, if any value, in understanding the viability of the emerging Plan and the viability of the proposed Spatial Growth Option. The information within it is very outdated and is not able to take into consideration the substantial increases in interest rates and construction costs, issues with the supply of materials and labour, or the in-practice costs of delivering biodiversity net gain.

3.77 It is critical that the Viability Assessment is updated to test the potential spatial growth options put forward in the emerging Plan, particularly the ability of urban sites to deliver a mix of housing and affordable housing, and for larger sites to deliver infrastructure. Without this information, the spatial strategy cannot be considered sound.

Hoo Peninsula

3.78 SGO3 also allocates development towards the Hoo Peninsula. It is noted as being “partial” rather than “full” as set out in SGO2. The Hoo Peninsula spatial delivery option is stated as being the worst performing spatial delivery option assessed within the Sustainability Appraisal. From the policies map, it appears that the Council is still intending to allocate significant levels of development in this area through SGO3 (including Cockham Farm HHH12, Angel Farm HHH22, and land either side of the A228 including HHH3, HHH6, HHH8 and HHH11).

3.79 If the Council is still intending to bring forward development in this location, then it is unclear how it aligns with the Council’s Vision or strategic objectives, given that this spatial delivery strategy scored so poorly against these objectives in the Sustainability Appraisal.

3.80 The Viability Appraisal shows significant costs relating to the delivery of the Hoo Peninsula, principally, section 106 costs are assumed to be in the region of £225 million, working out at £27,557 per unit. This is significantly higher than the other strategic sites which are assumed to require a contribution of £5,600 per unit. In addition, the Viability Assessment notes that the money which had been provisionally secured through HIF bid had been deducted from this £225 million. The £170 million fund for the Hoo Peninsula was pulled in February 2024 meaning the cost per unit is likely to be significantly more than £27,557 per unit and this calls into question whether the proposals in this location can be considered viable and deliverable.

Land North of Rede Court, Strood

3.81 Land North of Rede Court, Strood was included within both SGO1 and SGO2, however, it was not included within SCO3. It is not clear as to why the Site was considered suitable for both an urban focus and a dispersed growth spatial strategy, but the Site, along with all other sites north of Strood, were removed as part of the blended strategy.

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- 3.82 As set out within these representations, the removal of the Site from the Green Belt and its allocation for residential development would constitute sustainable development and would support the Council's Vision and Strategic Objectives.
- 3.83 The Site was rejected through the Sustainability Appraisal due to the loss of Best and Most Versatile ("BMV") agricultural land, its location within the Green Belt, the potential for coalescence between settlements and the Site being beyond a reasonable walking distance to current public transport services.
- 3.84 The Site's contribution to the Green Belt is dealt with in our responses to Questions 7 and 8 of this Consultation. However, it is considered that the Site does not perform strongly against the purposes of the Green Belt and would make a logical expansion to the settlement of Strood.
- 3.85 The detailed assessment of the Site at Appendix C of the Sustainability Appraisal scores a minor negative for the Site in terms of its agricultural land classification. The Agricultural Land Classification Map London and the South East (ALC007) shows that the vast majority of land within Medway is within Grades 1-3. The loss of BWV also needs to be balanced careful with the other benefits such as contributing towards sustainable development and mixed and balanced communities. The map provided by Natural England is also at a large scale and is not always up to date, meaning that the Site may have a different agricultural land classification.
- 3.86 Further, the Site does have connections to public transport services and development would have the potential to enhance active travel through pedestrian and cycle connections into Strood. In addition, the detailed assessment of the Site at Appendix C of the Sustainability Appraisal shows that the Site performs positively in terms of access to a bus stop, pedestrian and cycle connections and local services. Access to public transport is noted as neutral. As such, it is not considered that connection to public transport is a justified reason for dismissing the Site as an option for development.
- 3.87 The Site only scores one major negative within the Sustainability Appraisal after mitigation (pollution and waste), however, it is not considered that impacts from the A289 nor Gravesend Road could not be adequately mitigated so as to be considered acceptable.
- 3.88 The assessment of North of Strood as a Spatial Delivery Option within the Sustainability Appraisal is considered to be unduly negative, and does not take into account the ability of this option to deliver a range of housing early on in the plan period.
- 3.89 The Hoo Peninsula scores negatively against almost every strategic objective within the Sustainability Appraisal, however, it is chosen as a preferred spatial delivery option. The urban spatial delivery option alongside Medway City Estate and Chatham Docks also score relatively

negatively against most of the strategic objectives, however, they are given positive assessments against the economy and employment objective, despite the substantial potential loss of employment land. Further, the assessment does not recognise that the ability of these sites to deliver a range of housing types within the first five years of the Plan is severely inhibited.

- 3.90 Overall, it is considered that the assessment within the Sustainability Appraisal is not justified in terms of the assessment of both North of Strood as a Spatial Delivery Option and the Site itself under SNF1. The North of Strood and SNF1 should not have been discounted and should instead be considered as a preferred option for development.

Question 7: Do you consider the Green Belt boundary should be revised in line with the recommendations in the 2018 Green Belt Assessment?

- 3.91 The Council's Green Belt Review (2018) was prepared as part of the evidence base to inform the emerging Local Plan and assesses the Green Belt against the first three purposes of the Green Belt. The recommendations from the Green Belt Review proposes only minor amendments for the removal of land from the Green Belt alongside land for inclusion. No land is proposed to be removed for the allocation of development.
- 3.92 BDW does not agree with these recommendations and consider that exceptional circumstances clearly exist that justify a decision to release land from the Green Belt.
- 3.93 A Green Belt Appraisal of Land North of Rede Court, Strood, has been prepared by Iceni Projects and is submitted in support of the representations. This should be read in conjunction with these representations.
- 3.94 The report notes that the Review was undertaken at a high level, without a detailed assessment of the parcels examined or explanation for the determination of how each of the five parcels were assessed against the purposes of the Green Belt. In addition, the purpose of the report, as set out in section 1.1, was not to consider the potential of land to be released from the Green Belt.
- 3.95 Paragraph 4.12.2 of the Local Plan states that *"The Council attaches great importance to the function provided by the green belt along its western boundary with neighbouring boroughs."* However, as previously noted, Gravesham has allocated the site immediately north/west of Land North of Rede Court for removal from the Green Belt for housing development, demonstrating that Gravesham clearly does not attach great importance to this part of the Green Belt.
- 3.96 If this parcel were to remain as an allocation within the emerging Gravesham Local Plan, then Land North of Rede Court would become orphaned Green Belt land and would make no contribution to any of the purposes of the Green Belt. It would therefore be illogical not to allocate the Site for

development. As such, it is essential that Medway undertakes a more detailed review of the Green Belt parcels whilst taking a more holistic and strategic approach to the contribution which these parcels make to the purposes of the Green Belt as a whole, noting the conclusions drawn by Gravesham in respect of this specific area of the Green Belt.

- 3.97 The Green Belt Appraisal, prepared by Icen Projects, demonstrates that land to the north west of Strood is the most suitable land to be released from the Green Belt, compared to the other Green Belt areas within the District due to it being undevelopable. The parcel itself does not make a strong contribution to any of the Green Belt purposes and could instead contribute to the creation of permanent and defensible boundaries.
- 3.98 Therefore, the 2018 Green Belt Review should be updated to look at sites on a more granular level, whilst also considering the role of the Green Belt beyond Medway's administrative boundaries. Specifically, the Site should be recommended for release from the Green Belt.

Question 8: Do you consider that exceptional circumstances exist to justify review of the Green Belt boundary?

- 3.99 We do consider that exceptional circumstances exist to justify a review of the Green Belt boundary and release land from it for development.
- 3.100 Whilst "exceptional circumstances" are not defined within the NPPF or the PPG, local authorities must demonstrate that they have examined all other reasonable options for meeting the identified need for development.

i) Ensuring a Deliverable spatial option within the Plan Period

- 3.101 It is acknowledged by the Council that there are concerns regarding the deliverability of brownfield sites within the District. In principle, BDW support the regeneration of such sites, however, they should not form the basis of the preferred spatial strategy or should be identified as additional sites if there are concerns regarding their deliverability. To include a significant number of brownfield sites where there are deliverability concerns, raises issues regarding the overall soundness of the Plan and its ability to deliver housing need in full.
- 3.102 The greenfield sites identified by the Council within the spatial strategy, primarily the development of the Hoo Peninsula, has major question marks in relation to their ability to deliver within the plan period. The level of infrastructure required, and the strength of housing market needed means that it is unlikely to be in a position to deliver any housing until well into the latter stages of the plan period. This exposes the Plan to a significant risk of failure at the outset.

-
- 3.103 Development North of Strood has no such issues, with infrastructure and housing able to be delivered at the outset of the plan period, thereby enabling the Council to demonstrate a five-year housing land supply upon adoption.

ii) Affordable Housing Delivery

- 3.104 Medway has a significant need for affordable homes. The Local Housing Needs Assessment 2021 identified a need for 870 affordable homes each year, representing 55% of the total local housing need at the time (1,586 dpa). Since 2021, the local housing need in Medway has grown, and it is highly likely given the woeful housing delivery in recent years, that the need for affordable homes will also have increased.
- 3.105 Provision of 55% affordable housing on sites in Medway is clearly unviable, particularly given the low land values in much of the District. However, the preferred spatial strategy does not consider the opportunity to secure the delivery of high amounts of affordable through the delivery of Green Belt sites.
- 3.106 Development North of Strood therefore has the ability to deliver substantial levels of affordable housing, beyond which the current preferred spatial strategy is able to deliver. This is a clear exceptional circumstance for the release of land from the Green Belt as part of the spatial strategy.

iii) The Green Belt must be reviewed to preserve its function and to continue to serve its purpose

- 3.107 The allocation of Chapter Farm to the north of the Site within Gravesham is one of the largest within the council's emerging Local Plan. As such, Medway must undertake a significant review of the Green Belt, within the context of this allocation and acknowledging the characteristics of the District where much land is subject to national and international nature designations.
- 3.108 The allocation at Chapter Farm creates a new defensible boundary at the A289 and renders Medway's Green Belt in this location ineffective, meaning that the Site would clearly fall under the definition of 'grey belt' in the emerging NPPF and would form appropriate development. The allocation of the Site would enable a coherent masterplanned approach with Chapter Farm and would establish a permanent defensible boundary through the Local Plan.

iv) Sustainability Benefits of Significant Growth at North Strood

- 3.109 Development at North Strood would generate economic benefits through the ability to establish high connectivity to the major employment location of London. Further, it would allow for the sustained delivery of market and affordable housing in the early part of the Plan period and generate investment in local infrastructure.

-
- 3.110 In terms of social benefits, development in this location would deliver high levels of affordable housing on-site. It would create new high-quality places, promoting access to countryside and support the ability of residents to adopt highly sustainable and healthy lifestyles through access to public transport and active travel modes.
- 3.111 Development would deliver environmental benefits through green infrastructure and access to the countryside, and publicly accessible spaces, as required by NPPF. Proposals would deliver a new sustainable transport to link into Ebbsfleet to join with existing infrastructure creating scope for high modal split.

Summary

- 3.112 As presented above, it is clear that there are a number of exceptional circumstances to release land from the Green Belt.
- 3.113 Firstly, as the Council has acknowledged, it is not possible to meet housing needs within the existing brownfield land in the District and there are design and heritage concerns around increasing the density of settlements to the extent which would be required to meet the housing requirement.
- 3.114 Secondly, given that the surrounding authorities have their own constraints and will all see an increase in the housing requirement, it is unlikely that any of these authorities will be able to take any unmet need from Medway. In any case, the assumption should be that Medway should seek to meet its own need in full in the first instance.
- 3.115 Whilst there is a comparatively small amount of Green Belt land within the administrative area of Medway, a significant part of the District is subject to absolute constraints. To the south of the built-up area of the district is the Kent Downs National Landscape. To the north and east, there are numerous constraints including Floods Zones 2 and 3, Sites of Special Scientific Interest ("SSSI"), Special Areas of Conservation ("SAC") and Special Protection Areas ("SPA").
- 3.116 This leaves only a small part of the District which lies outside of the above constraints, alongside the Green Belt. This area is the rural Hoo Peninsula, the worst performing spatial delivery option in the Sustainability Appraisal. Firstly, much of this land lies within the buffer zones of the SSSIs, SPAs and SACs and secondly, is disparate from the main built-up area of Medway.
- 3.117 As recognised within the Sustainability Appraisal, there are a number of disbenefits to development in this location, most notably, the impact of significant levels of development in a rural area close to areas subject to national and international nature designations. The level of investment in infrastructure required to deliver the number of homes required in this area is substantial and this would have negative impacts in terms of both viability and sustainability.

-
- 3.118 Whilst national policy seeks to protect the Green Belt, sustainable development is at the heart of the NPPF. Development should not be directed towards unsustainable areas, simply by virtue of land not being included in the Green Belt. Development north of Strood, whilst located within the Green Belt, is not adjacent to national and international nature designations and is in a highly sustainable location. The amount of land which would be needed to be released from the Green Belt is minimal and would result in well-defined and permanent boundaries.
- 3.119 Development in this location aligns with the principles of sustainable development set out at paragraph 8 of the NPPF and the Council's Vision for Medway. This, along with the clear need for land to deliver high quality housing including a mix of housing types, clearly demonstrates exceptional circumstances exist to release land from the Green Belt, and specifically land north of Strood.

4. CONCLUSION

- 4.1 Land North of Rede Court, Strood presents a significant opportunity to expand the residential area of northern Strood in a sustainable and well-connected location. The Site's proximity to key transport corridors, along with its integration into the existing urban fabric, emphasises its suitability for future housing development.
- 4.2 The emerging changes to the National Planning Policy Framework (NPPF) highlight the necessity for Medway Council to address the housing needs and strategically review Green Belt boundaries. By aligning with these national and local objectives, the Land North of Rede Court is well-positioned to contribute meaningfully to the region's housing supply.
- 4.3 Whilst BDW supports the overarching Vision for Medway 2041, there are significant concerns regarding the effectiveness of the chosen spatial strategy in realising this Vision. The proposed Local Plan, with its current plan period, falls short of the required 15-year outlook, necessitating an extension to 2042 to align with national policy. Furthermore, the Plan's emphasis on urban regeneration and its exclusion of North Strood as an area for expansion raises questions about the ability to meet housing needs and support economic growth comprehensively.
- 4.4 The preferred spatial strategy, as presented, does not contribute towards the Council's aspirations for promoting promote a competitive economy, nor does it adequately address the need for a diverse range of housing types and tenures to provide homes for all. Furthermore, it fails to meet the tests for soundness as outlined in paragraph 35 of the NPPF.
- 4.5 The 2018 Green Belt Review suggested only minor amendments to the Green Belt, with no significant land removal for development. BDW, however, disagrees with these recommendations and argues that there are exceptional circumstances for releasing Green Belt land for development. The Green Belt Review should be updated, with more detailed assessments, noting that Gravesham has allocated land to the north of the Site for development.
- 4.6 BDW believes that exceptional circumstances exist to justify revising the Green Belt boundary in Medway, principally due to the District's constraints on available land and the need to meet housing requirements sustainably. The existing constraints within Medway, including limited brownfield land, significant national and international nature designations, and the unsustainability of other potential development areas, necessitate this approach.
- 4.7 Development at North Strood aligns with sustainable development principles, offering substantial economic, social, and environmental benefits. It would address the significant need for affordable

housing and ensure that Medway meets its housing requirements while establishing well-defined and permanent Green Belt boundaries.

- 4.8 We welcome further discussion with the Council on this matter in order to ensure that the emerging Local Plan can be found sound.



SEPTEMBER
2024

Land North of Rede Court, Strood

Green Belt Appraisal of Land within Medway Borough Council, and Land within eastern side of Gravesham Borough Council

Iceni Projects Limited on behalf of
Barratt David Wilson Homes

September 2024

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Land North of Rede Court, Strood
GREEN BELT APPRAISAL OF LAND WITHIN MEDWAY
BOROUGH COUNCIL, AND LAND WITHIN EASTERN
SIDE OF GRAVESHAM BOROUGH COUNCIL

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APPENDICES

- A1. GREEN BELT APPRAISAL METHODOLOGY
- A2. EXTRACT FROM MEDWAY GREEN BELT REVIEW 2018
- A3. EXTRACT FROM GRAVESHAM GREEN BELT STUDY 2018

Document title:	Land north of Rede Court, Strood Green Belt Appraisal
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1. INTRODUCTION

- 1.1 Icen Projects have been instructed to submit representations to the Medway Borough Local Plan Regulation 18 Consultation (September 2024) on behalf of our client, Barratt David Wilson Homes ('BDW').
- 1.2 This study considers which areas of Green Belt within Medway Borough and the eastern edge of Gravesham Borough adjoining Medway, are most suited for release from the Green Belt for development, by considering the Green Belt against the NPPF. This includes considering whether the land within the Green Belt is clearly constrained and therefore not suitable for strategic scale development. It also assesses the contribution of the land to the five purposes of the Green Belt, as well the resultant harm to the Green Belt purposes if the land were to be released for development. The methodology for this report is contained in **Appendix A1**.
- 1.3 The study also considers whether land within the Green Belt can be considered to be grey belt, as per the consultation NPPF of July 2024.
- 1.4 The Representations submitted alongside this Green Belt Appraisal sets out the exceptional circumstances which are deemed to exist to justify changes to the Green Belt, and also explains the need to allocate land within the current Green Belt for development. This Appraisal should be read alongside the Representations.
- 1.5 A Landscape and Visual Appraisal and Green Belt Assessment in relation to the land north of Rede Court, Strood, was submitted as part of earlier representations. However, this Green Belt Appraisal takes a more strategic approach, and considers a wider area incorporating the Green Belt within Strood, and that within the east of Gravesham Borough to the west of Strood, to consider the cross-boundary function of the Green Belt.

2. PLANNING POLICY CONTEXT

National Planning Policy Framework (Dec 2023)

- 2.1 Section 13 of the NPPF concerns the protection of Green Belt land. Paragraph 142 highlights that the Government attaches great importance to Green Belts, adding that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 2.2 Paragraph 143 defines the five purposes of the Green Belt, which are:
- 'a) to check the unrestricted sprawl of large built-up areas;*
 - b) to prevent neighbouring towns merging into one another;*
 - c) to assist in safeguarding the countryside from encroachment;*
 - d) to preserve the setting and special character of historic towns; and*
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*
- 2.3 Paragraph 147 sets out that *'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. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'*
- 2.4 Paragraph 148 notes that, when defining Green Belt boundaries, plans should, amongst other criteria, not include land which it is unnecessary to keep permanently open. Paragraph 145 of the NPPF notes that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
- 2.5 Paragraph 152 highlights that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. In Paragraph 153 adds that:
- 'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the*

potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'

Draft National Planning Policy Framework (July 2024)

2.6 In July 2024, the government published the draft NPPF which is currently being consulted on. Relevant proposed changes to the NPPF are set out below.

2.7 The five purposes of the Green Belt remain unchanged in the Draft updated NPPF.

2.8 Paragraph 142 highlights that once Green Belt boundaries are established, they should only be altered where exceptional circumstances are fully evidenced and justified through the preparation and updating of a plan. Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing, commercial or other development through other means. In these circumstances authorities should review Green Belt boundaries and propose alterations to meet these needs in full, unless the review provides clear evidence that such alterations would fundamentally undermine the function of the Green Belt across the area of the plan as a whole.

2.9 Paragraph 144 notes that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations.

2.10 The glossary in the consultation NPPF defines grey belt as follows:

'For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).'

2.11 The supporting text to the consultation notes that land that makes a limited contribution to the Green Belt will:

'a) Not strongly perform against any Green Belt purpose; and

b) Have at least one of the following features:

i. Land containing substantial built development or which is fully enclosed by built form.

ii. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another.

iii. Land which is dominated by urban land uses, including physical developments.

iv. Land which contributes little to preserving the setting and special character of historic towns.'

National Planning Practice Guidance

2.12 The Planning Practice Guidance, in the Green Belt section under paragraph 001 notes that judging the openness of Green Belt land depends upon the circumstances of the case. The guidance notes that there are a number of factors to consider, and sets out three examples which include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

Local Planning Policy Context

2.13 Medway are currently undertaking consultation on their Regulation 18 Local Plan. That emerging Local Plan does not propose Green Belt release for development.

2.14 Gravesham Borough Council are also in the process of developing their new Local Plan. The land north, east and west of Three Crutches, bordering Medway Borough Council, has a draft allocation for 1,385 dwellings within the Regulation 18 Gravesham Local Plan, as shown on the plan below.

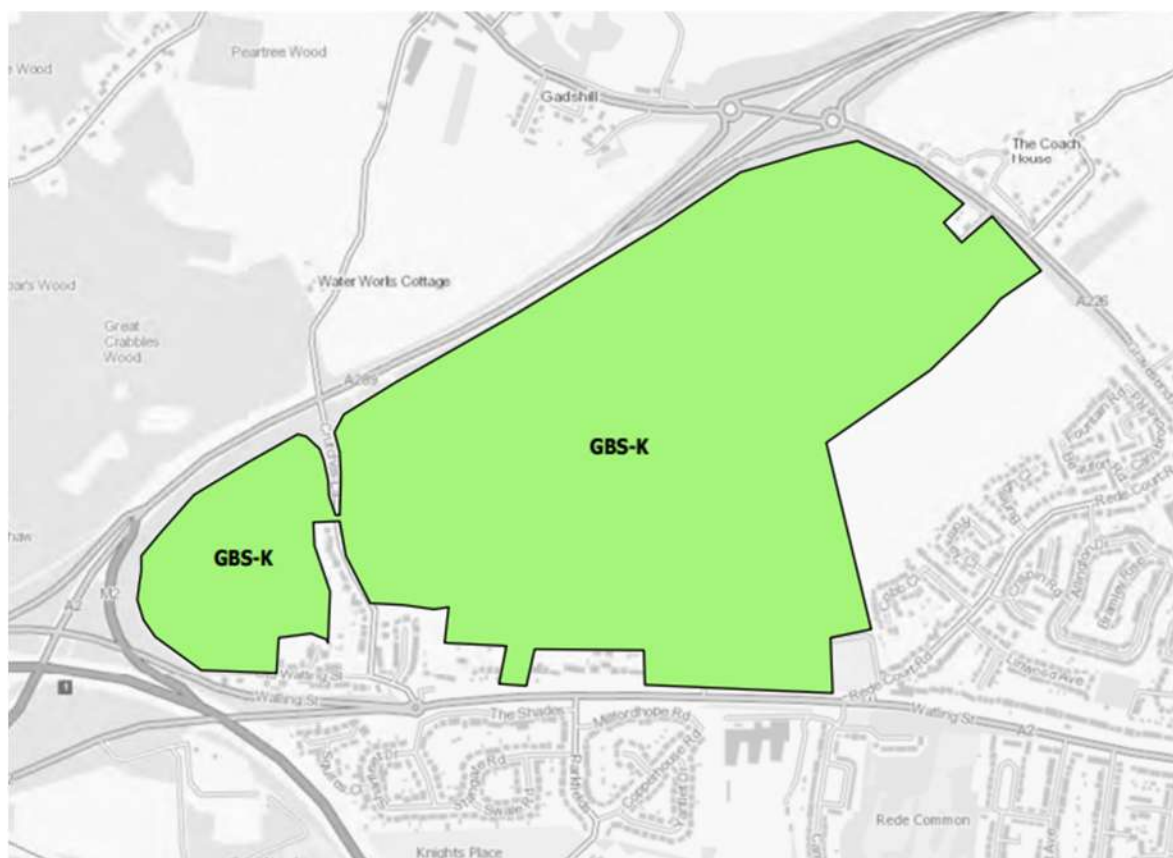


Figure 2.1 Proposed allocation of Green Belt land at Three Crutches within emerging Gravesham Local Plan.

3. EVIDENCE BASE STUDIES

- 3.1 In this section, we consider the relevant Green Belt studies undertaken by Gravesham and Medway Councils to inform their development plans.

Medway Green Belt Review (2018; extract in Appendix A2)

- 3.2 Medway Council undertook a Green Belt Review in 2018 as part of the evidence base to inform the emerging Local Plan. The Review assesses Medway's Green Belt against the first three purposes of the Green Belt. It divided the Green Belt within Medway into five study parcels, as shown on the plan in Figure 3.1.
- 3.3 The study assessed the contribution of the parcels against the first three purposes, on a five point scale of High, Moderate, and Low, with two interim levels. An extract showing the summary of the findings is included below:

Parcel	Description	Purpose 1	Purpose 2	Purpose 3	Aims	Summary
1	Land to north of A289 Wainscott Bypass. Extends to district boundary - north	M	M	H	H	M/H
2	Land north of Brompton Farm Road and south of A289 Extends to district boundary - west	H	M	H	H	H
3	Land between M2 and CTRL. Extends to district boundary – north	H	M	H	H	H
4	Land between CTRL and Strood/Sole Street rail line. Extends to district boundary – west	H	M	H	H	H
5	Land south of Strood/Sole Street rail line and west of A228. Extends to district boundary - south and west	M	M	H	H	M/H

Extract showing summary findings of the Medway Green Belt Review.

- 3.4 We would note that the study was undertaken at a high level, and that it only includes a cursory assessment and very little explanation for its findings in relation to the parcels' contribution to the first three purposes. Furthermore, the purpose of that Green Belt Review was not to consider the potential release of land from the Green Belt for development, as noted in section 1.1 of that Review:

'The purpose of a Green Belt Review is to provide evidence of how different areas perform against the Green Belt purposes set out in national policy; planning authorities may then take this into account, alongside other evidence, in making decisions about possible changes to Green Belt boundaries. A boundary revision can take the form of an expansion or a contraction. A Green Belt Assessment may conclude that no changes are appropriate. The results of this review will help to inform the options for accommodating growth within Medway and detailed changes to the Green Belt boundaries and site allocations, if required by exceptional circumstances.'

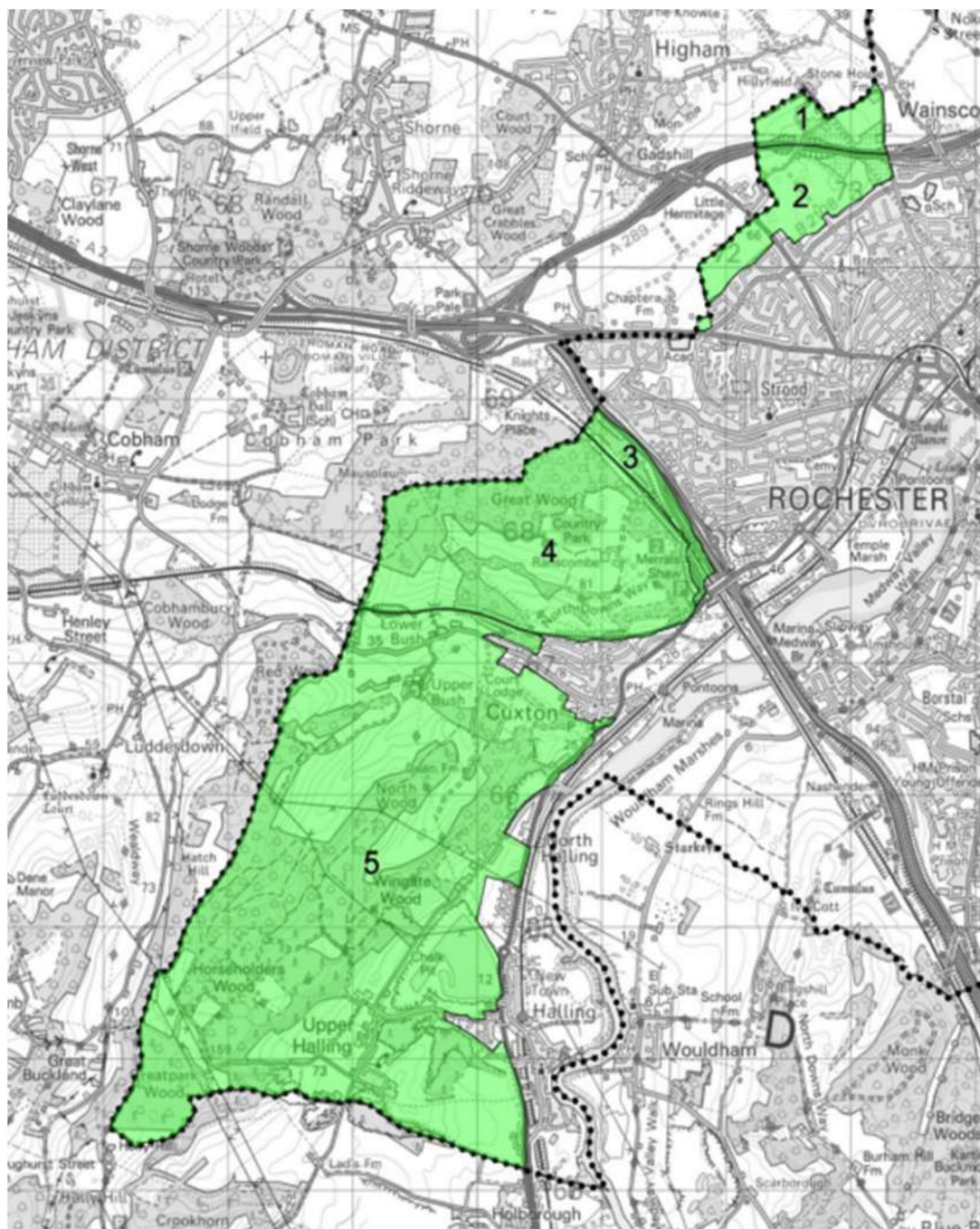


Figure 3.1 Study parcels in the Medway Green Belt Review

Gravesham Green Belt Study (2018; extract in Appendix A3)

- 3.5 The stage 1 study considered the contribution of 26 parcels of land within the Green Belt, towards the first four purposes of the Green Belt. It assessed the contribution on a three point scale: Significant Contribution, Contribution, and Minimal/No Contribution.
- 3.6 Parcels of interest to our Green Belt Appraisal are parcels 5, 10, 11 and 17, which lie on the eastern edge of Gravesham and in the vicinity of Strood. An extract of the study considering these parcels is contained in **Appendix A3**.

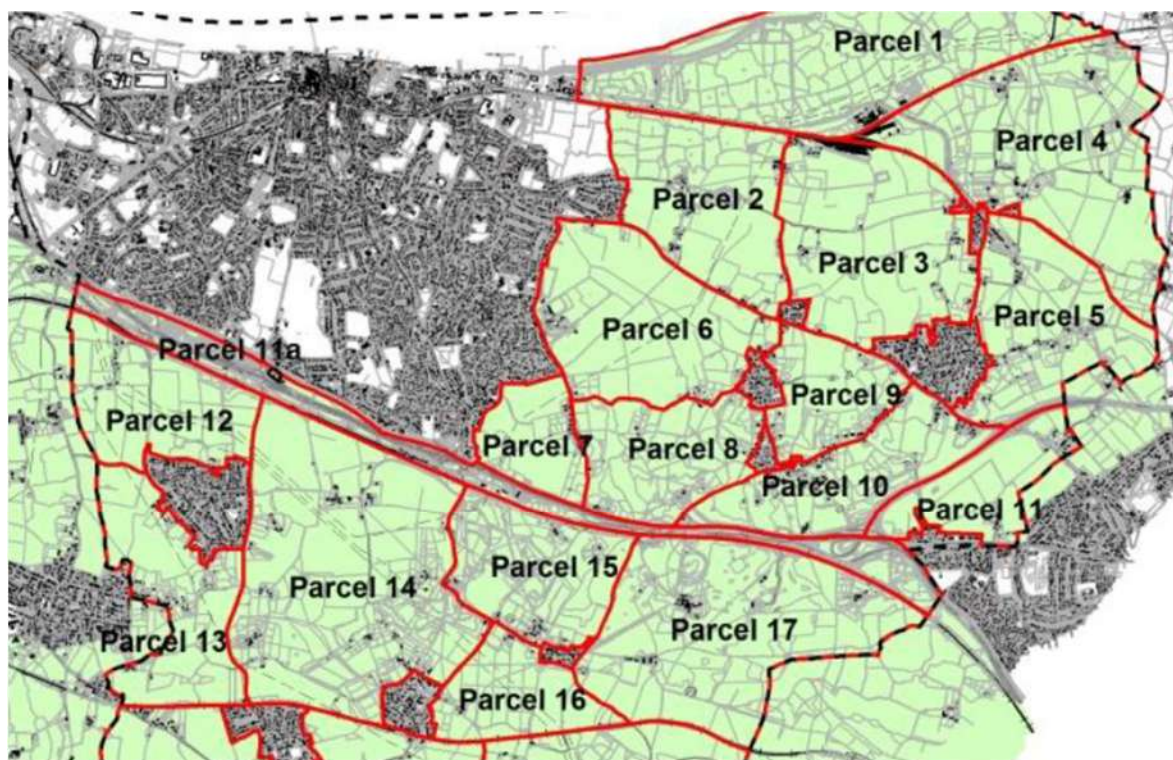


Figure 3.2 Parcels within the Gravesham Green Belt Study 2018.

3.7 The findings of the study in relation to those four parcels are summarised below in the table:

Parcel	Purpose 1	Purpose 2	Purpose 3
5	Minimal/No Contribution	Significant Contribution	Contribution
10	Minimal/No Contribution	Significant Contribution	Contribution
11	Contribution	Significant Contribution	Contribution
17	Minimal/No Contribution	Minimal/No Contribution	Contribution

3.8 However, we would note that in relation to purpose 2, preventing neighbouring towns from merging, the study commented in relation to all 10 parcels that lie between Strood and Gravesend, that the individual parcel 'in combination with other parcels' plays a significant role in preventing these towns from merging. We do not consider that the review therefore assesses the contribution of the individual Green Belt parcel to purpose 2, and we consider that this is not an appropriate manner in which to consider the purposes of Green Belt land. The NPPF notes in paragraph 148b, that when defining Green Belt boundaries, Local Plans should not include land which it is unnecessary to keep permanently open. It is therefore not possible to consider whether all the study parcels between Gravesend and Strood are required to be kept permanently open, in order for this purpose of the Green Belt to be served.

Gravesham Stage 2 Green Belt Study (2020)

- 3.9 The purpose of the study, produced by LUC on behalf of Gravesham Borough Council, was to assess the potential harm to the purposes of the Green Belt of releasing land from the Green Belt in Gravesham for development. This study considered sites adjacent to settlements that had been identified through the 'Call for Sites' exercise, and do therefore not consider the Green Belt as a whole, nor does it consider the most suitable area of the Green Belt for development.

4. DEVELOPMENT POTENTIAL OF GREEN BELT WITHIN MEDWAY AND SURROUNDINGS

Clear Constraints to Development

- 4.1 Not all land within the Green Belt is considered developable, regardless of its contribution to the purposes. There are some designations or physical features of land which are considered to be a clear constraint to development. Land covered by these designations/characteristics is not considered suitable for development in most cases.
- 4.2 We consider these clear constraints to be those identified within footnote 7 of the NPPF, noting that some features or characteristics may only affect part of the land, and the remainder of the land may therefore still be developable (such as Listed Buildings or land partly within Flood Zones 1 and 2). While land within the Green Belt is mentioned within footnote 7, we do not consider it a clear constraint to development: Green Belt land can be developed by following a specifically identified process, as outlined within the NPPF. These clear constraints include:
- Habitats sites (and those sites listed in NPPF paragraph 187) and/or designated as Sites of Special Scientific Interest;
 - Land designated as Local Green Space, a National Landscape (Area of Outstanding Natural Beauty), a National Park (or within the Broads Authority) or defined as Heritage Coast;
 - Irreplaceable habitats;
 - Designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72 of the NPPF); and
 - Areas at risk of flooding or coastal change.
- 4.3 The plan at Figure 4.1 shows the clear constraints to development of land within the Medway Green Belt. As evident from the plan, a large proportion of the Green Belt west of the M2 motorway lies within the Kent Downs National Landscape, and is therefore not considered suitable for strategic scale development.
- 4.4 Two main Green Belt areas therefore remain potentially developable: a southern triangular parcel located north of Upper Halling, west of the A228, and east and south of Pilgrims Road/The Street; and a northern parcel, north west of Rede Court Road and Brompton Farm Road, west of Stonehorse Lane, and south east of the A289. Below, we consider these two parcels in further detail within this Appraisal.

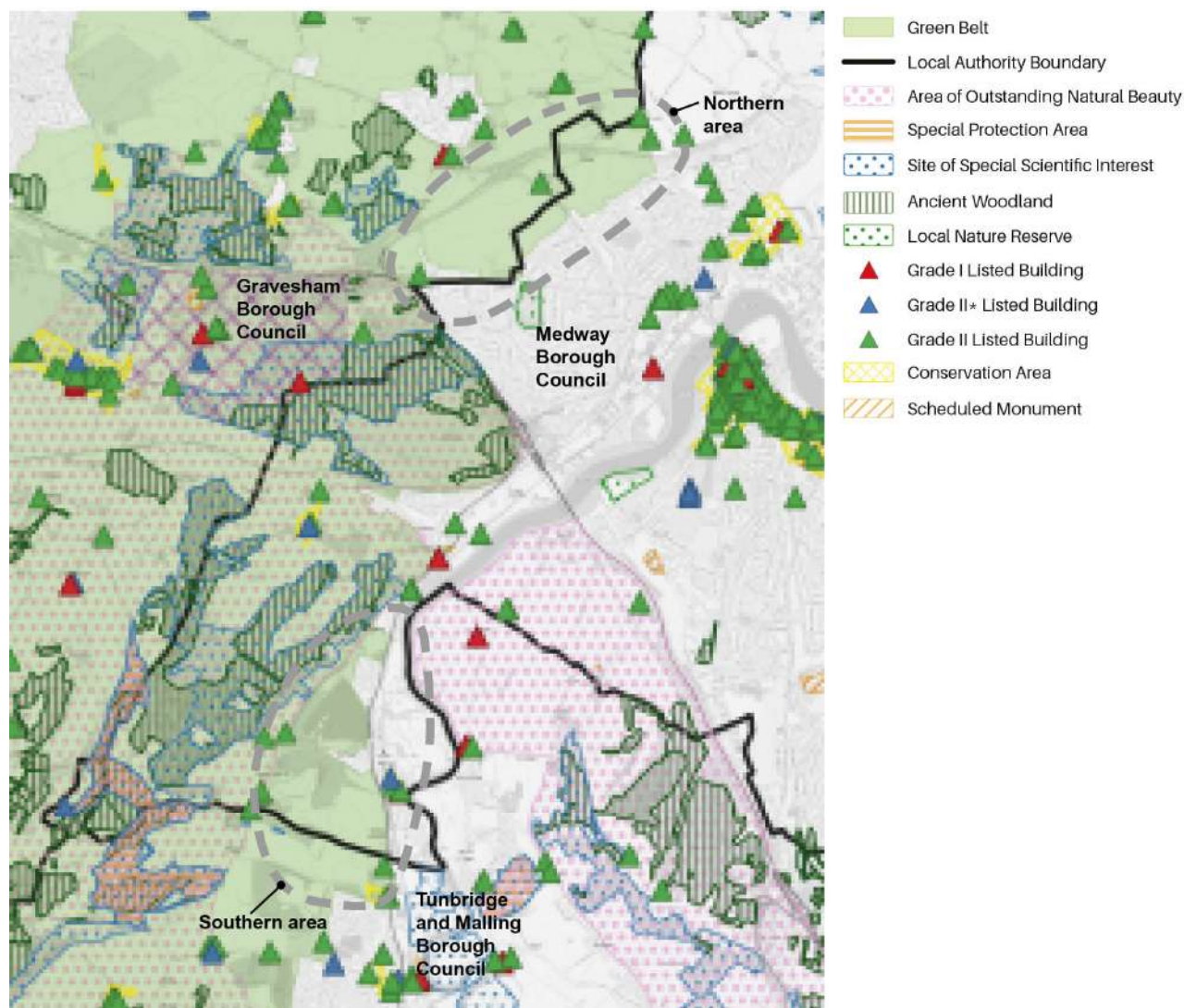


Figure 4.1 Green Belt and Clear Constraints

Southern Parcel

- 4.5 Much of the land within the southern Green Belt parcel is undevelopable, as it comprises former quarries, including a large lake, and an area of steeply embanked land covered in woodland. The remaining land comprises two main parcels: one between Upper Halling and Halling and north of Snodland, and another between North Halling and the recent development in the north of Halling. The plan at Figure 4.2 shows the two parcels which we consider to be free from clear constraints, and potentially developable. The parcel boundary has been extended into the adjoining Tunbridge and Malling Borough, to consider the Green Belt within a strategic context.

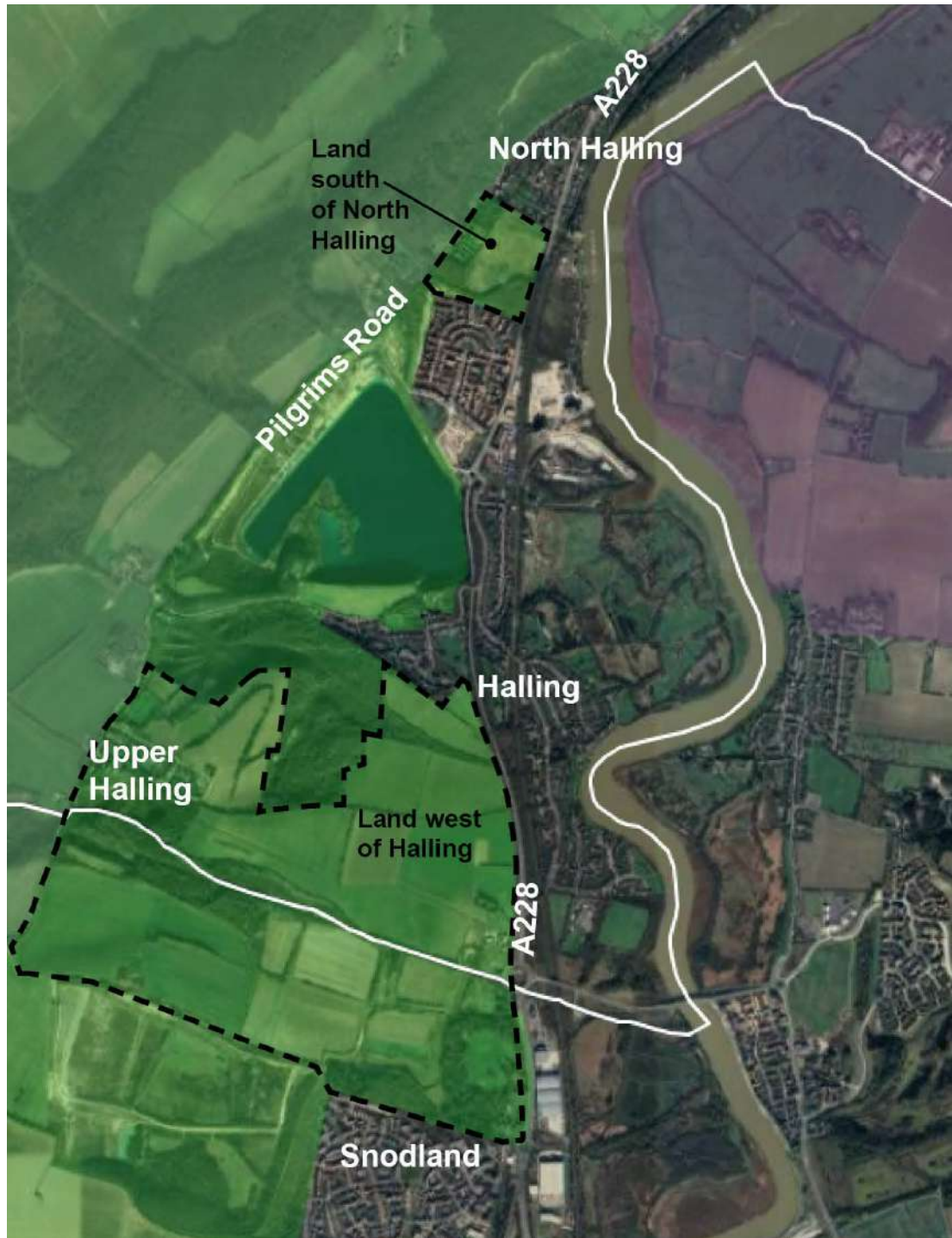


Figure 4.2 Location of southern study parcels

Northern Parcel

- 4.6 The study area for the northern parcel has been extended to incorporate the adjoining Green Belt within Gravesham Borough, to consider the strategic function of the Green Belt in this area. This northern parcel has been divided into two parts: the land north west of Strood, and the land north of the A228.
- 4.7 The northern parcel is mostly free from clear constraints, although it envelopes an area of existing residential properties at Dillywood Lane. Figure 4.3 shows the two proposed study parcels.



Figure 4.3 Location of northern study parcels

5. APPRAISAL AGAINST THE GREEN BELT PURPOSES

- 5.1 In this section, we consider the contribution the parcels make to the first three Green Belt purposes. We also consider the harm to the purposes of development of the parcels, assuming that development comes forward in a planned and well designed manner which does not constitute sprawl.
- 5.2 As set out within the Medway Green Belt, the historic cores of the towns of Rochester and Strood are far removed from the Green Belt boundary, and we do therefore not consider the fourth purpose of the Green Belt in this Appraisal. It is also not possible to compare the contribution of land to the fifth Green Belt purpose, and it is therefore not considered within this report.

Purpose 1 – to check the unrestricted sprawl of large built-up areas

Southern parcel – West of Halling	1. Average Contribution 1. Moderate to High Harm
<p>Snodland and Halling are assumed to be large built-up areas for the purpose of this, however, Upper Halling is not, nor is North Halling.</p> <p>The existing Green Belt boundary is clearly defined along the A228, but less clearly defined in the north along the edge of the properties on Vicarage Close. The settlement at Upper Halling is washed over by the Green Belt, and the Green Belt extends westwards for some distance. Some existing sprawl occurs within the south east of this parcel at the junction with Peter's Bridge and the A228. The parcel is clearly separated from the settlement at Snodland to the south by woodland along the settlement edge.</p> <p>Further sprawl could occur along the A228, as well as around Upper Halling in the south. It could also occur to the south east of Vicarage Close.</p> <p>The existing woodland around the parcel provides some containment to potential development within in. Development extending west beyond the A228 would not be clearly related to Halling, and would appear as sprawl.</p> <p>Development within the parcel would extend beyond the very clear boundary created by the A228, and would not appear well related to the existing settlement at Halling. Large scale expansion of Upper Halling is not considered appropriate, as it is washed over by the Green Belt. A small, southerly extension south of Vicarage Close and west of the A228 would be well related to the settlement, and would be well contained by strong boundaries.</p>	

Southern parcel – South of North Halling	1. Average contribution 1. Moderate Harm
<p>Halling is considered a large-built up area, however, North Halling is not. The parcel already contains sprawl in the form of ribbon development along Pilgrims Road. The A228 forms a firm edge to the Green Belt to the east, but the northern and southern edges of the Green Belt here are formed by rear garden boundaries, which do not provide a very clear edge to a settlement and which is more vulnerable to sprawl. Sprawl could occur along the edges of the adjoining settlements to the north and south, or as further development along Pilgrims Road.</p> <p>Development would be well related to the existing settlements to the north and south, but no alternate potential Green Belt boundaries exist to contain development from the remainder of the Green Belt (unless the whole parcel is removed).</p>	
Northern parcel – North west of Strood	1. Average Contribution 1. Limited Harm
<p>Strood is considered a large built-up area. The parcel contains some sprawl in the south, to the north of the A2, and also around Dillywood Lane north east of the A226. The settlement at Three Crutches is inset from the Green Belt, but the settlement form is characteristic of sprawl, with ribbon development extending northwards along Crutches Lane and also along the north of the A2. The existing boundaries of the Green Belt are not strongly defined in the south and south east, following the rear garden boundaries of properties within Three Crutches, and the housing within Strood further north east. The boundary here is not regular, moving in and out along the rear of the properties.</p> <p>The A289 forms a potential strong new Green Belt boundary, and a strong and clearly identifiable boundary between the settlement and the wider countryside. Similarly, the junction of the A2, M2 and A289 forms another very clear boundary to the parcel.</p> <p>Development within the parcel would form a continuation of the existing settlement at Strood. While Three Crutches is a settlement inset from the Green Belt, the settlement itself appears as sprawl. Comprehensive development which incorporated the existing sprawl at Three Crutches, as well as that at Dillywood Lane, would appear to consolidate the settlement form, thereby removing the appearance of the existing sprawl. Alternately, development could come forward which maintains Three Crutches as a separate settlement, but which still forms a clear extension to Strood. Development in this parcel would be very clearly contained by stronger potential Green Belt boundaries along the adjoining A289 and junction.</p>	
Northern parcel – North of the A228	1. No Contribution 1. No Harm
<p>This parcel does not adjoin a large built-up area.</p>	

Purpose 2 - to prevent neighbouring towns merging into one another

Southern parcel – West of Halling	2. No Contribution 2. No Harm
<p>Upper Halling and Halling cannot be described as towns, but Snodland is a town. Therefore, the parcel plays no role in preventing towns from merging. Development could come forward which would be able to maintain separation between these settlements, if sensitively designed.</p>	

Southern parcel – South of North Halling	2. No Contribution 2. No Harm
North Halling and Halling cannot be described as towns. However, if this parcel would be developed, the settlements of Halling and North Halling would merge into one another.	
Northern parcel – North west of Strood	2. No Contribution 2. No Harm
Strood is a town. Higham is a village. Nevertheless, even when considering separation between settlements of any size, there is a very clear distinction currently between Strood and Higham, with Higham located on the hilltop to the north of the clearly separating corridor formed by the A289 and associated vegetation, and Strood located on undulating ground south of the A289. Even if development within this parcel were to extend the settlement of Strood onto the north-facing slope of the valley along the A289 corridor, it would remain clearly evident that Strood lies to the south of the road corridor on the land rising away from the corridor, and Higham lies on the hill top to the north of the road corridor, beyond intervening open land.	
Northern parcel – North of the A228	2. No Contribution 2. Limited Harm
While the parcel lies between Strood and Higham, it is not contiguous with either of these settlements. It therefore plays no major role in this purpose. If the parcel were to be developed, it would be clearly separated from Strood by the A228 corridor, and sufficient intervening open land would remain between a development and Higham on the higher ground, so that there would be no coalescence.	

Purpose 3 - to assist in safeguarding the countryside from encroachment

Southern parcel – West of Halling	3. Essential Contribution 3. High Harm
The land is clearly rural and undeveloped, with limited development occurring within it. The existing Green Belt boundary along the A228 is very strong, and clearly marks the edge between the settlement and the adjoining countryside. While the woodland to the west could form a new edge to development, it would not be as clearly defined or as strong as the existing boundary formed by the road. Development within the parcel would appear to have 'jumped' the strong road boundary, and would be perceived as encroachment into the countryside.	
Southern parcel – South of North Halling	3. Average Contribution 3. Moderate Harm
The parcel is mostly open, but contains some sprawl development. Development of the parcel would remain well separated from the wider open countryside, and would be well related to the existing settlement to the south (or north). A readily identifiable Green Belt boundary could be created along Pilgrims Way, although the existence of the sprawl along the west of the road west of this parcel, means that there will not be a clear edge between the settlement and the countryside, and further development could therefor occur west of the road to further blur the separation between the settlement and the countryside.	

Northern parcel – North west of Strood	3. Average Contribution 3. Moderate Harm
<p>The parcel is mostly countryside, but includes sprawl development in the south to the north of the A2, and also around Dillywood Lane. Parts of the northern area of the parcel are covered in polytunnels which affect the open character of the countryside here. The parcel's character is also influenced by the adjoining houses which back onto the parcel, where the rear gardens form the settlement edge and Green Belt boundary, reducing its rural character in places. The existing Green Belt boundary is weakly defined, following the property boundaries adjacent to the arable land, and the boundary shape is irregular. Very strong, readily identifiable boundaries occur to the north west and south west of this parcel along the A289 and the junction with the A2/M2, and these boundaries would form much stronger and more permanent separating features between the settlement and the countryside beyond.</p> <p>Development in the parcel would clearly adjoin the existing settlement, and would form a clear extension of Strood.</p>	
Northern parcel – North of the A228	3. Essential Contribution 3. High Harm
<p>This parcel does not adjoin a settlement, and is located wholly within the countryside. While there is some development within the centre of the parcel, this is based around a farmstead and is visually well contained from the surrounding landscape. Development of this parcel would clearly be an encroachment into the countryside. There would be no clear edge to the development beyond that to the south along the A228.</p>	

Conclusion in relation to Purposes

- 5.3 The table below sets out a summary of the findings of the appraisal of the three parcels against the purposes of the Green Belt.

Parcel	Purpose	Contribution to Green Belt Purpose	Harm to Green Belt Purpose
Southern parcel – West of Halling	Purpose 1	Average	Moderate to High
	Purpose 2	None	None
	Purpose 3	Essential	High
Southern parcel – South of North Halling	Purpose 1	None	None
	Purpose 2	None	None
	Purpose 3	Average	Moderate
Northern parcel – North west of Strood	Purpose 1	Average	Limited
	Purpose 2	None	None
	Purpose 3	Average	Moderate
Northern parcel – North of the A228	Purpose 1	None	Limited
	Purpose 2	None	Limited
	Purpose 3	Essential	High

-
- 5.4 The Appraisal finds that the southern parcel, south of North Halling, contributes least to the purposes of the Green Belt, and would result in the lowest level of harm in comparison to the other two study parcels. Whilst the land south of North Halling could potentially be released from the Green Belt, development on that land would result in the coalescence of the separate settlements of Halling and Upper Halling. Realistically, it is therefore not suitable for development.
- 5.5 The land north west of Strood contributes less to the purposes of the Green Belt than the land west of Upper Halling or north of the A228. The resultant harm to the purposes of the Green Belt will also be less if the land north west of Strood were developed, than the harm resulting from development of the land west of Halling or north of the A228.

Grey Belt Assessment

- 5.6 The southern parcel, west of Halling, is not considered to constitute grey belt land, as it strongly performs in relation to purpose 3, safeguarding the countryside from encroachment. However, the two fields south of and south east of Vicarage Close on the edge of Halling, do not perform strongly against this purpose, and the woodland belt along the south of this parcel, as well as the A228 would form stronger Green Belt boundaries than the current boundary along the settlement edge. Furthermore, these two fields contribute little to preserving the setting and special character of historic towns, and can therefore be considered grey belt. These fields are also considered to be sustainably located, being adjacent to the edge of a large village with a railway station and some local facilities.
- 5.7 The northern parcel, north of the A228 is also not considered to be grey belt, as it performs strongly in relation to Green Belt purpose 3. While it does contain some previously developed land in the centre of the parcel, this is not considered to be sustainably located, being surrounded by countryside.
- 5.8 The southern parcel, south of North Halling, does not perform strongly against any of the Green Belt purposes, and it contributes little to the preservation of the setting and special character of a historic town. It is therefore considered to constitute grey belt. It is also sustainably located, being on the edge of the large village of Halling. However, as set out earlier, development of this land would lead to the merging of the settlements of Halling and North Halling, which would be highly undesirable for landscape and townscape character reasons.
- 5.9 The northern parcel, north west of Strood, only makes an average contribution to the Green Belt purposes, and does not strongly perform against any of them. This is due to the existing weak Green Belt boundary which follows the settlement edge, and the fact that a much stronger Green Belt boundary could be created along the A289, which would form a stronger boundary to prevent sprawl, and which would form a stronger separation between the settlement and the open countryside beyond. There is also much sprawl within this parcel already. The parcel also contributes little to the

preservation of the setting and special character of a historic town. It therefore meets the requirements to be considered grey belt. The parcel is located on the edge of a large town, along bus routes, and with many services and facilities located in the town. It is therefore within a sustainable location (as set out further within the Representations submitted alongside this report).

- 5.10 Furthermore, should Gravesham Borough release the land north west of Strood (which has been a draft allocation since 2020 and constitutes Gravesham's largest allocation) within their Local Plan, the land north of Rede Court Road would be bound by housing on three sides and a main road on the fourth, and would perform very weakly in relation to the Green Belt purposes. The land within Medway Borough south of the Gravesham allocation and north of Rede Court, would therefore clearly constitute grey belt, and should therefore be allocated before other Green Belt land, as per paragraph 144 of the consultation NPPF.

6. CONCLUSION AND RECOMMENDATIONS

- 6.1 The Representations submitted alongside this Green Belt Appraisal sets out the exceptional circumstances which are deemed to exist to justify changes to the Green Belt, and also explains the need to allocate land within the current Green Belt for development. This Appraisal should be read alongside the Representations.
- 6.2 Our appraisal found that the land to the north west of Strood is the most suitable for release from the Green Belt, and that it would result in the least harm to the Green Belt purposes. Part of this land is located within Medway Borough, and part within Gravesham, however a Borough boundary does not influence the functioning of the Green Belt.
- 6.3 As set out earlier, the emerging Gravesham Local Plan shows the land within the study parcel we have considered north west of Strood, as being allocated for residential development and release from the Green Belt. The draft allocated land forms the southern part of the study parcel, bound to the south west by the A2/M2/A289 junction, to the north west by the A289, to the north east by the A226, to the south east by the Borough boundary (and therefore the Green Belt boundary here will be less clearly defined than those along the main roads), and to the south the development will adjoin Three Crutches and the A2. In effect, this development will form an extension to the settlement of Strood.
- 6.4 This parcel is also considered to constitute grey belt land, as per the NPPF July 2024 consultation definition, and it is sustainably located.
- 6.5 We propose that Medway Borough 'complete the jigsaw', and release the remaining land within the Green Belt to the north west of Strood, to allow a strategic, comprehensively masterplanned development which provides homes on the edge of an existing large town, whilst providing for the growth needs of both Gravesham and Medway Boroughs. The development will form an extension to Strood, and a well-designed masterplan could maintain separation between Strood and Three Crutches, should this be desirable.
- 6.6 Importantly, development in this parcel would benefit from very clear, defensible boundaries, which will ensure a clean break between the settlement and the countryside beyond. These boundaries, formed by the main roads (mostly dual carriageway set within a vegetated corridor), would also form very strong, readily identifiable and permanent Green Belt boundaries.
- 6.7 We therefore propose that the Green Belt boundary is redrawn, to release the land north west of Strood from the Green Belt, as shown on the plan at Figure 6.1.



Figure 6.1 Proposed new Green Belt boundary along A2/M2 junction, and A228

- 6.8 Furthermore, should Gravesham Borough release the land north west of Strood within their Local Plan, the land north of Rede Court Road would be bound by housing on three sides and a main road on the fourth, and would perform very weakly in relation to the Green Belt purposes. The land within Medway Borough south of the Gravesham allocation and north of Rede Court, would therefore clearly constitute grey belt, and it should therefore be released before other green field land within the Green Belt.

A1. GREEN BELT APPRAISAL METHODOLOGY

M1. GREEN BELT APPRAISAL METHODOLOGY

Policy Context

National Planning Policy Framework (Dec 2023)

- M1.1 Section 13 of the NPPF concerns the protection of Green Belt land. Paragraph 142 highlights that the Government attaches great importance to Green Belts, adding that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- M1.2 Paragraph 143 defines the five purposes of the Green Belt, which are:
*'a) to check the unrestricted sprawl of large built-up areas;
b) to prevent neighbouring towns merging into one another;
c) to assist in safeguarding the countryside from encroachment;
d) to preserve the setting and special character of historic towns; and
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*
- M1.3 Paragraph 147 sets out that *'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. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'*
- M1.4 Paragraph 148 notes that, when defining Green Belt boundaries, plans should, amongst other criteria, not include land which it is unnecessary to keep permanently open. Paragraph 145 of the NPPF notes that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
- M1.5 Paragraph 152 highlights that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. In Paragraph 153 adds that:

'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'

M1.6 Paragraph 154 highlights that local planning authorities should regard the construction of new buildings as inappropriate in the Green Belt, but defines seven exceptions where development is not inappropriate by definition. Paragraph 154g presents a scenario where the complete redevelopment of previously developed land in the Green Belt is not inappropriate:

‘g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

– not have a greater impact on the openness of the Green Belt than the existing development; or

– not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.’

National Planning Practice Guidance

M1.7 The Planning Practice Guidance, in the Green Belt section under paragraph 001 notes that judging the openness of Green Belt land depends upon the circumstances of the case. The guidance notes that there are a number of factors to consider, and sets out three examples which include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

Purposes of the Green Belt

M1.8 The NPPF does not attach a hierarchy to the Green Belt purposes and it is assumed that each purpose is of equal importance. In addition, neither the NPPF nor the National Planning Policy Guidance provides direction on how to assess the performance of Green Belt land.

M1.9 The most relevant non-policy guidance in relation to Green Belt Appraisals is published by the Planning Advisory Service (‘PAS’), Planning on the Doorstep: the Big Issues – Green Belt (February 2015). This methodology has therefore been informed by the PAS guidance, as well as through considering other evidence base reports which have been examined in public as part of Local Plan Examinations, and found acceptable.

M1.10 There are, however, two components to consider in relation to Green Belts: the value (contribution) of the land to the Green Belt in relation to the five purposes; and the potential harm to the purposes

of the Green Belt of development of that land. In considering both the value and potential harm, we have taken other paragraphs within the NPPF into account, which, while not strictly policy, aid in expanding the concept of the value of the Green Belt. These include paragraph 147 which refers to previously developed land and land that is well-served by public transport, as well as improvements to the environmental quality and accessibility of the Green Belt. Paragraph 148 refers to the requirement to not include land within the Green Belt which is not necessary to be kept open permanently, and sets out that Green Belt boundaries should be clearly defined, using physical features that are readily recognisable and likely to be permanent. Paragraph 145 includes commentary about positive enhancements to the beneficial use of Green Belts, such as providing access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

M1.11 Harm to the purposes of the Green Belt as a result of inappropriate development should be considered within the 'any other harms' category as set out within NPPF paragraph 153. It must also be considered when assessing whether development complies with the exceptions listed in paragraph 154(b) and 155.

M1.12 The PAS advice note states that some of the five Green Belt purposes will be more relevant, or important, than others. Below, we consider the five purposes in more detail.

Purpose 1: to check the unrestricted sprawl of large built up areas

M1.13 It may be argued that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. The PAS advice notes that the terminology of 'sprawl' comes from the 1930s when Green Belt was conceived, and it poses the question of whether development that is planned positively through a Local Plan, and well designed with good masterplanning, constitutes sprawl. The early Green Belt helped prevent ribbon development which was prevalent at the time (i.e. single plot depth development to one of either side of existing or new roads, often extending out of the settlement into the countryside). Therefore, ribbon development is one way in which sprawl can be defined. Sporadic or dispersed development on the edge of a settlement could also be seen as sprawl, as can development which extends beyond a clear settlement boundary following a physical element, such as a river or main road.

M1.14 However, sprawl can similarly be contained, or the appearance of sprawl can be mitigated by, amongst others, maintaining a clear separation between the settlement and the countryside beyond. In this regard, the NPPF notes in paragraph 148(f), that Local Plans should define Green Belt boundaries 'clearly, using physical features that are readily recognisable and likely to be permanent.' Potential Green Belt boundaries are considered in Section M1.38.

M1.15 We also note that the purpose refers to 'large built up areas', and this therefore excludes settlements such as most villages or hamlets, or washed-over settlements (noting, however, that sprawl

anywhere is an undesirable characteristic). Large built up areas are therefore considered to mostly comprise towns or cities.

M1.16 Criteria to consider in relation to the contribution of the land to purpose 1:

- The land's relationship to a large built-up area, including its degree of containment by built form;
- Degree of openness, and how much built development already occurs;
- The current character of the settlement or Green Belt edge, and whether it follows a clearly identifiable and defensible boundary; and
- The occurrence of other potential defensible boundaries, and whether they are clearly identifiable, permanent, regular, amongst others.

M1.17 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with table 1.1. The harm to the purpose as a result of development of the land is judged in accordance with table 1.2.

Table 1.1 Contribution to Purpose 1	
Essential	Existing very strong boundary. Clearly outside of settlement. No physical features to form new settlement edge. No to little containment. No or limited sprawl evident nearby. Very open landscape.
Average	Existing clearly identifiable boundary, but other potential boundaries also exist. Some sprawl evident near settlement, but not connected to it. Mostly open, with some containment.
Limited	Weak existing boundary. Some sprawl occurs within study parcel. Strong potential new boundaries exist. Well contained.
None	Not near a large built up area. No clear distinction between development within Green Belt and that outside of it. Sprawl is adjoined to the settlement. No clearly identifiable existing boundary, but strong potential boundaries. Very well contained.
Table 1.2 Harm to Purpose 1	
High	Development would be perceived as sprawl without clear boundaries, and not well related to settlement. Includes ribbon development and scattered development. No edge to settlement would be identifiable.
Moderate	Development would constitute sprawl, but the extent would be minor, and some containment would occur. Development might be well related to existing sprawl, and therefore have a limited additional impact. Development could be planned but there are no clearly identifiable boundaries.
Limited	Development would be planned and would form an extension to the existing settlement, and a clearly identifiable new settlement boundary would be identifiable.
None	Development is infill and well contained to all sides. Development would consolidate existing sprawl and create identifiable settlement edge.

Purpose 2: To prevent neighbouring towns from merging into one another

- M1.18 This purpose specifically refers to towns, but it should be noted that the separation of all types of settlements from each other, and the maintenance of separate identities to the settlements, is of importance in relation to other matters outside of Green Belt policy.
- M1.19 The nature and size of the separation are important considerations in determining the role that a land parcel plays in maintaining separation between settlements. The PAS guidance states that when assessing this purpose, *‘a ‘scale rule’ approach should be avoided. The identity of a settlement is not really determined just by the distance to another settlement; the character of the place and of the land between must be taken into account.’*
- M1.20 In cases where coalescence has already occurred elsewhere between the settlements, it is necessary to consider the importance or value of maintaining the remaining separation. If the settlements are already indistinguishable from each other, then there is little value in maintaining a ‘token’ area of separation, if it would either not be meaningful or functional, or if it is considered that there is no need to retain separation for the sake of it.
- M1.21 Criteria to consider in relation to the contribution of the land to purpose 2:
- The distance between settlements;
 - Intervisibility;
 - The role of landform or landcover in ensuring separation;
 - The individual characters of the settlements;
 - The desirability or need to retain separation;
 - Identifiable settlement boundaries or separating features, such as motorways for example; and
The effect of development on the transition between settlements, i.e. would you clearly leave one settlement and enter the next if the land were to be developed.
- M1.22 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with table 2.1. The harm to the purpose as a result of development of the land is judged in accordance with table 2.2.

Table 2.1 Contribution to Purpose 2	
Essential	The land occupies the whole or majority of the physical gap between settlements which are currently separate, and where it is necessary to maintain separation. The land forms the last area of separation between settlements which have already merged elsewhere, and where the land perceptually functions as a separating feature, where judged necessary.
Average	The land forms part of a wider gap between settlements. Some boundaries occur which would ensure separation. Settlements have clear boundaries at the moment, but potentially new clear boundaries also exist. Limited coalescence has already taken place, and the land prevents the perception of further coalescence.
Limited	There is a substantial gap between the settlements. Settlements are clearly separate. Several clearly separating features occur between the settlements. Much coalescence has already occurred, and additional low levels of coalescence would not change the overall separate identities of the settlements.
None	The distance between the settlements is significant. The settlements are clearly identifiable. The land occupies a gap which is judged to provide no meaningful or functional separation between settlements which have largely merged.

Table 2.2 Harm to Purpose 2	
High	Development would cause settlements which are currently separate, to coalesce. Development would occupy the final identifiable area of separation between settlements which have already coalesced.
Moderate	Development would bring settlements closer to each other, but clear boundaries or clearly identifiable intervening undeveloped land will ensure their separation and separate identities are maintained. Development will increase coalescence where it already occurs, and substantially reduce the clear perception of separation.
Limited	Development would bring settlements closer to each other, but clear boundaries and clearly identifiable, large areas of intervening undeveloped land will ensure their separation and separate identities are maintained. Development would lead to coalescence where settlements are already not separately identifiable.
None	Development will not lead to any perception of coalescence.

Purpose 3: To assist in safeguarding the countryside from encroachment

- M1.23 The PAS advice considers that, presumably, all Green Belt does assists in safeguarding the countryside from encroachment, making the purpose difficult to use to distinguish the contribution of different areas. PAS notes that the most useful approach is to look at the difference between urban fringe – land under the influence of the urban area; and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.
- M1.24 Countryside is not defined within the NPPF, and in planning policy terms it most often refers to land outside of the settlement boundary. If the fundamental aim of Green Belts is to prevent urban sprawl and keep land permanently open, then it follows that countryside is undeveloped, and open.

- M1.25 This purpose therefore relates to the character and function of the landscape, to an extent, and the extent to which it displays a 'countryside' character. For the purposes of this appraisal, land that is clearly countryside is considered to be rural, with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields. On the other side of the land use and openness scale are urban areas, and clearly identifiable settlements. However, the use and character of land often falls between these two sides, and is often described as having a semi-rural/urban, urban fringe, or settlement edge character.
- M1.26 The second main consideration relates to the extent of encroachment, and whether any containment exists which would limit the actual or perceptible encroachment. Encroachment into a landscape with no clearly defined boundary features to curtail further development or encroachment, will have a larger impact on this purpose than encroachment into a landscape which is separated from the wider adjoining countryside by clearly identifiable features. A planned urban extension on the periphery of a settlement is likely to encroach on the wider countryside, and consideration of this purpose should assess the ability of the land parcel to accommodate change and its impact on the wider countryside.
- M1.27 Criteria to consider in relation to the contribution of the land to purpose 3:
- Land use on site;
 - Character of site;
 - Effect on character of site from adjoining land uses;
 - Connection to adjoining settlement, and connection to adjoining countryside;
 - Occurrence of clear boundaries between the settlement and the countryside.
- M1.28 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with table 3.1. The harm to the purpose as a result of development of the land is judged in accordance with table 3.2.

Table 3.1 Contribution to Purpose 3	
Essential	The land is clearly rural and undeveloped. The existing settlement edge is very strong and no other equally strong potential boundary exists in the area.
Average	The land is predominantly rural and undeveloped. The existing settlement edge is clearly identifiable, but other potential clearly identifiable boundaries occur in the area.
Limited	The land is mostly developed, and is not characteristic of rural countryside. The settlement edge is either well defined or not well defined, however, clearly identifiable potential boundaries occur within the area.
None	The land is clearly developed. Strong boundaries exist which would form a new settlement edge and Green Belt boundary.

Table 3.2 Harm to Purpose 3	
High	Development would occur on open undeveloped land. Development would not be clearly adjoined to the settlement, and would not be clearly separated from the countryside. There would be no clear boundary between the settlement and the countryside, and the wider Green Belt would be vulnerable to further development. The development would affect the rural character of the wider Green Belt.
Moderate	Development would occur on mostly undeveloped land, but would be adjoined to the existing settlement. Some extension of the settlement into the countryside would occur, but clearly identifiable boundaries will create a firm boundary between the settlement and the wider countryside. There will be no significant effect on the wider Green Belt, which will remain countryside.
Limited	Development would occur on land which contains much existing development, and which cannot be described as rural. Development will form an extension to the settlement, and will be well contained from the wider Green Belt by clearly identifiable boundaries.
None	Development would be located on land which is mostly developed and which does not reflect rural or countryside characteristics. Development will clearly form part of the settlement, and will not extend the settlement into the adjoining open countryside.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

- M1.29 The PAS advice notes that this purpose is generally accepted as relating to very few settlements in practice. In most towns there already are more recent developments between the historic core, and the countryside between the edge of the town.
- M1.30 We also note that the purpose refers to historic towns, so this excludes modern towns, and also smaller settlements such as villages. That does not mean that the character or openness of land around a historic village should not be preserved, but simply that it is not the purpose of the Green Belt to do that.
- M1.31 Criteria to consider in relation to the contribution of the land to purpose 4:
- Is the settlement a historic town;
 - Does the land contribute to the setting or character of the historic town;
 - Is there modern development between the land and the historic town (i.e. usually the historic core), which affects the role of the land within the Green Belt;
 - Conservation Area Appraisals and guidance;
 - Visual relationship between historic core and wider countryside;
 - Views to landmark buildings in historic core.
- M1.32 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with table 4.1. The harm to the purpose as a result of development of the land is judged in accordance with table 4.2.

Table 4.1 Contribution to Purpose 4	
Essential	The settlement is a historic town and the land comprises the whole or principle part of the visual or physical setting. The land is located adjacent to the historical parts of the town.
Average	The settlement is a historic town and the land comprises a part of the setting. There is very limited intervening modern development, and there is a direct relationship between the land and the historic elements of the town.
Limited	The settlement is an historic town. There may be views of historical elements from the land, which may contribute to the wider setting. There is no direct association between the historical town and the land.
None	The settlement is not a historic town. The historic core is separated from the land by much intervening modern development. There is no visual connection of importance (i.e. beyond incidental) between the land and the historic core of the town.

Table 4.2 Harm to Purpose 4	
High	Development would sever the connection between a historic town and its setting, or would significantly affect the special character of the historic town due to the loss of the open land.
Moderate	Development would intrude on the connection between the historic town and its setting, but the setting and special character would be maintained.
Limited	Development will would result in a very minor incursion into the setting of a historic town. Development would result in a minor alteration to an element which contributes to the special character of the historic town.
None	Development is not near a historic town. There is no or very limited intervisibility between the development and the historic town. The development maintains all elements which contribute to the setting or special character of the historic town.

Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land

- M1.33 The PAS advice sets out that when Council's decide to release Green Belt land, it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land for development. If Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.
- M1.34 Previously developed land within the Green Belt, especially where the openness is affected, is, however, considered to perform less of a Green Belt function than greenfield sites.
- M1.35 Criteria to consider in assessing harm caused by development within the Green Belt in relation to purpose 5:
- Is the land already developed;

- Does the development affect its openness;
- Can the land be considered derelict.

M1.36 The harm to the purpose as a result of development of the land is judged in accordance with table 5.1.

Table 5.1 Harm to Purpose 5	
High	Development is on undeveloped, open land. Evidence shows that there is sufficient derelict land or land within the settlement to accommodate the Council's required growth.
Moderate	Development is on partially developed land, but may extend beyond the existing built area. Evidence shows that there is sufficient derelict land or land within the settlement to accommodate the Council's required growth.
Limited	Evidence shows that there is insufficient derelict land or land within the settlement to accommodate the Council's required growth. Development is on open and undeveloped land.
None	Evidence shows that there is insufficient derelict land or land within the settlement to accommodate the Council's required growth. Development is on land which is already developed and not open, or on derelict land within the Green Belt.

Conclusion

M1.37 PAS notes that the types of areas of land that might seem to make a relatively limited contribution to the overall Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes, would be where:

- it would effectively be 'infill', with the land partially enclosed by development;
- the development would be well contained by the landscape, e.g. with rising land;
- there would be little harm to the qualities that contributed to the distinct identity of separate settlements in reality;
- a strong boundary could be created with a clear distinction between 'town' and 'country'.

Green Belt Boundaries

M1.38 The consideration of the effectiveness of the existing Green Belt boundaries is also taken into consideration in the assessment of the land. The NPPF states that boundaries should be defined 'clearly, using physical features that are readily recognisable and likely to be permanent'.

M1.39 Where Green Belt boundaries follow the rear of existing housing on the edge of a settlement, these can lack visual containment and result in a poor relationship between the edge of settlement and the adjoining land parcel. Where the boundary along the rear gardens on a settlement edge is more irregular or complicated, or where it crosses rear gardens, it is likely the case that the Green Belt

boundary is not well defined along clearly identifiable features. In such cases, consideration should be given to whether an improved boundary could be provided through planned expansion.

M1.40 Clearly identifiable physical, recognisable, and likely permanent features include:

- Major transport infrastructure, roads, and railways;
- Landscape features including woodland blocks or belts, and watercourses;
- Topography, such as ridgelines;
- Public rights of way.

M1.41 Hedgerows, dependant on their character, would usually form a less clearly identifiable boundary, and private roads would form a less permanent feature for a boundary, however, these elements could also be used to align Green Belt boundaries.

M1.42 When considering the performance of land against the Green Belt purposes, the presence of alternative, durable boundaries can help reduce the perception of sprawl, countryside encroachment and loss of separation. In addition, release of land will typically form part of a planned extension, and consideration should be given to whether new appropriate Green Belt boundaries can be created.

A2. EXTRACT FROM MEDWAY GREEN BELT REVIEW 2018

Medway Green Belt Review



Medway Council December 2018

A total of five separate land parcels have been identified (see fig 5). The delineation of these parcels has been arrived at through a process that has included:

- Desktop analysis of mapping data, including OS mapping and aerial photos;
- Site survey work and local knowledge
- Discussions with neighbouring authorities on their Green Belt Assessment methodologies
- Well defined physical features, such as roads and rail lines (which provide distinct and permanent edges that help define the extent of the parcels)

The defined parcels are intended to be strategic enough to inform the next version of the Local Plan and yet small enough to inform the site allocations and address potential Green Belt boundary anomalies (as per para 139 of NPPF). All sites were surveyed in 2017.

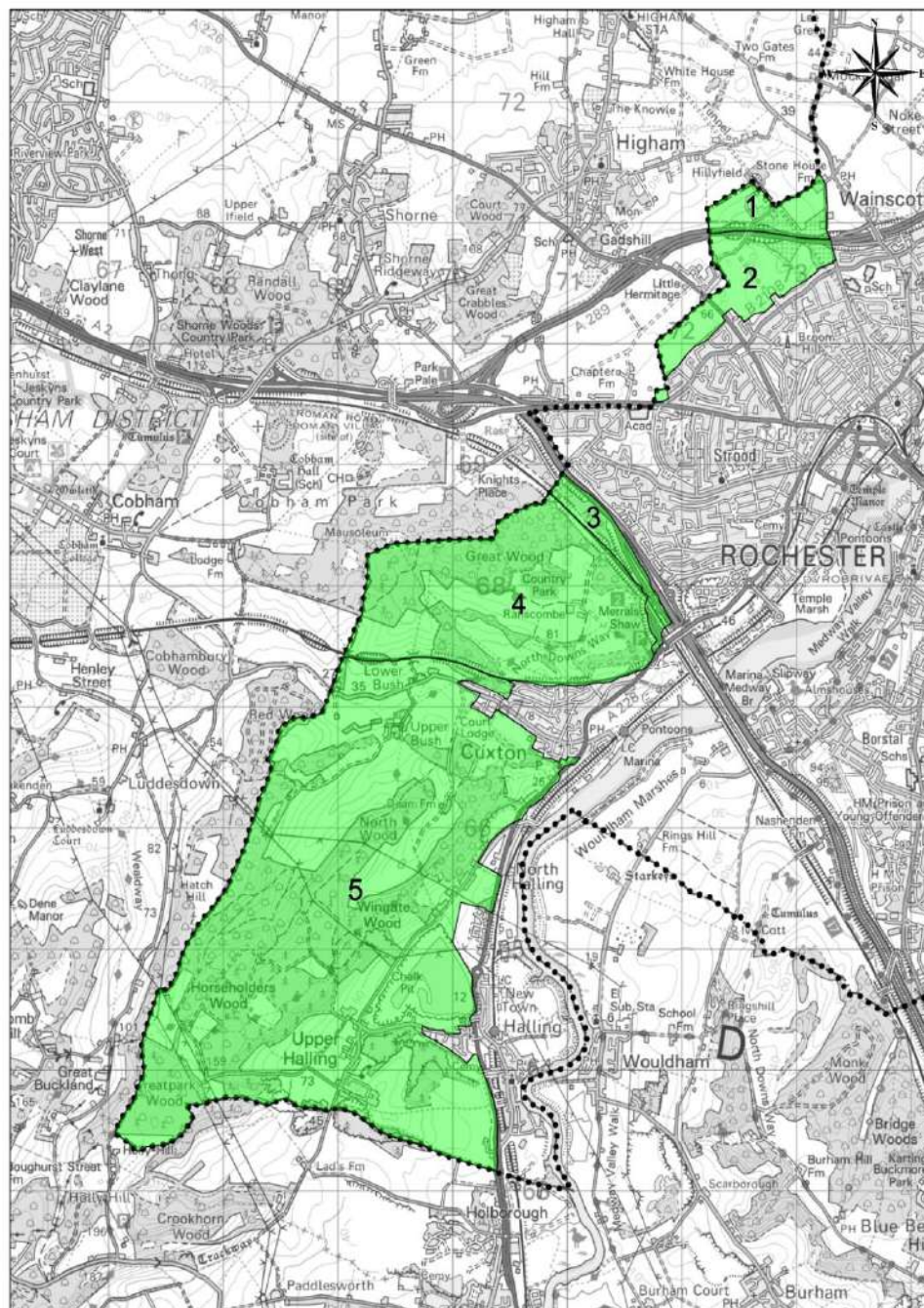


Fig 4 Medway Green Belt land parcels

4.0 Parcel assessment

4.1 Land Parcel 1

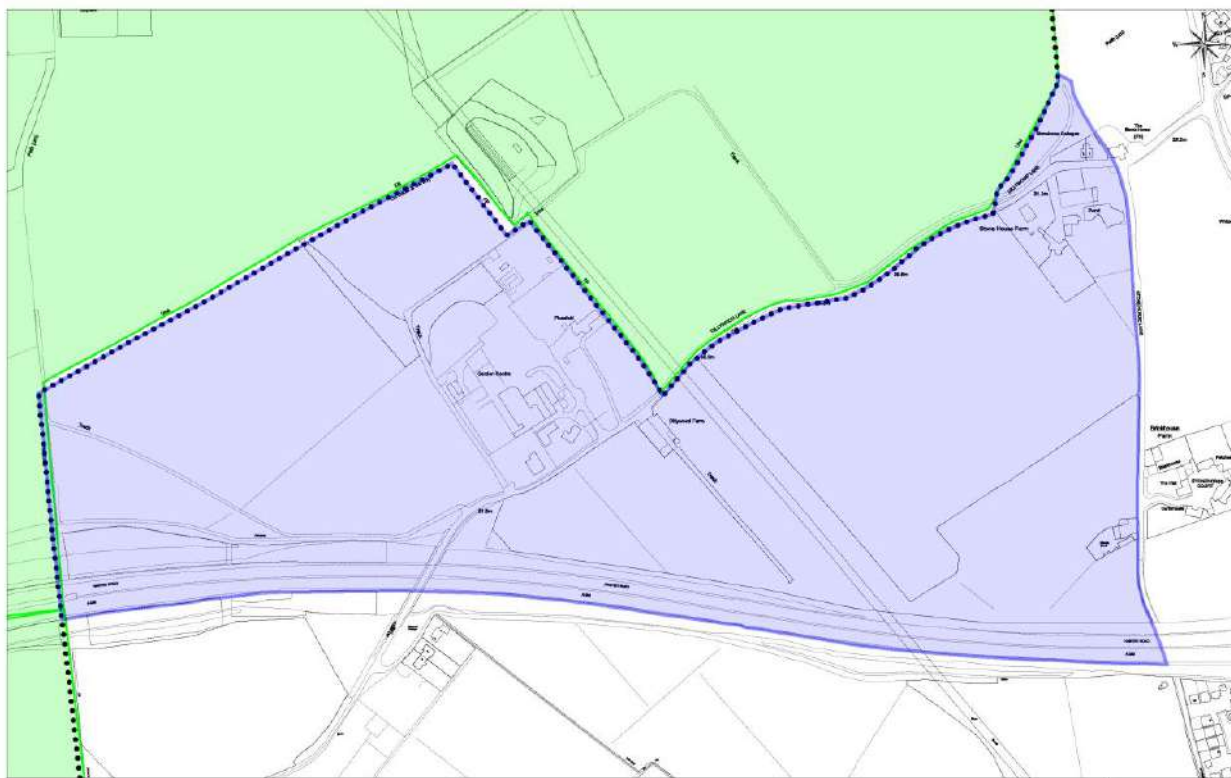


Fig 5

4.1.1 Description

This parcel is situated to the north of the A289. This parcel should be viewed integrally with Parcel 2. It forms part of a larger tract of Green Belt land which extends beyond the district boundary into Gravesham (to the north and west). The Green Belt boundary to the east is formed by Stonehorse Lane. The green belt washes over the A289.

Land uses are predominantly agricultural (arable) with a smaller area of orchards. The field pattern is of a medium scale with the largest arable field situated to the east. Fields to the west are generally divided by poplars and shelter belts. There is a strong belt of woodland running along the northern boundary of the A289. Dillywood Garden Centre is situated towards the centre and there is a small hamlet to the east. This includes Stone House Farm, two cottages and a Public House. To the south east lies Gouge Farm and a small modern residential development. Urbanising influence of A289 to south mitigated by cutting and woodland buffer edge. The landform is gently undulating, falling away to the north west and east.

4.1.2 Purpose and Aims

Moderate/High Contribution to Purpose and Aims of Green Belt.

4.1.3 Boundary anomalies

Boundary anomaly identified at land to north of Stone House Farm where district boundary is not clearly delineated by physical features on ground. Opportunity for a proposed change to enlarge Green Belt to stronger physical boundary is shown on *Fig 12* map.

4.1.4 Washed over and inset areas

No change proposed.

4.1.5 Other Planning considerations

Local Plan Policy Designations

Protection of Open Space Policy L3; Area of Local Landscape Importance Policy BNE34; Rural Lanes BNE44

Relevant Planning Decisions

- *Water Gardens & Landscape Centre, Dillywood Lane, Higham, ME3 7NT*
MC/10/0267 Construction of a 5 bedroomed dwelling ancillary to the garden centre with detached garage / workshop and meeting room. Refused, 02 July 2010. No appeal.

4.1.6 Results and recommendation

Moderate/High This contribution is considered to be significant.

Recommendation No change to principle of Green Belt but minor adjustments to boundary anomalies

4.2 Land Parcel 2

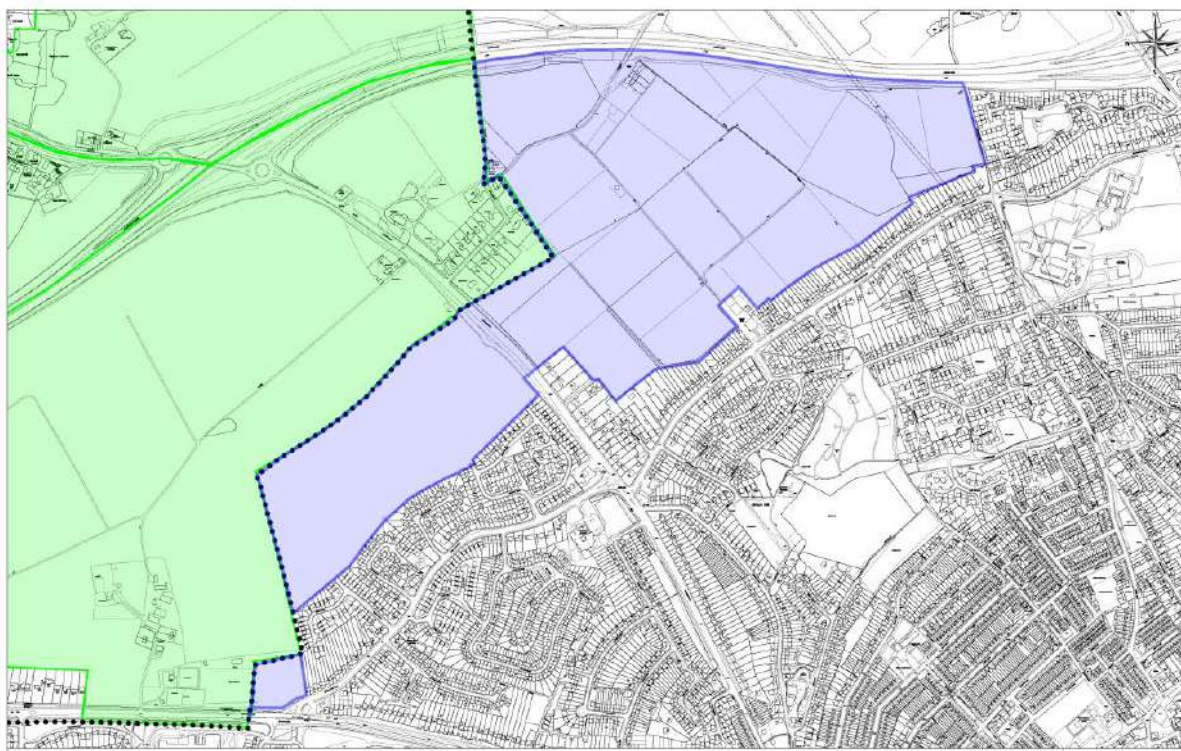


Fig 6

4.2.1 Description

This parcel is situated to the south of the A289. The southern edges of this parcel are bordered by the urban fringes of Strood which form Medway's Green Belt boundary within this area. This parcel should be viewed integrally with Parcel 1. It forms part of a larger tract of Green Belt land which extends beyond the district boundary into Gravesham (to the north and west). The green belt washes over the A289 and A226.

Land uses consist of a mixture of arable, horticulture and orchards. The orchard and horticultural uses are focussed to the north with arable farmland to the south and west. The land falls away gently to the north west. The landscape character changes according to land uses. The area of polytunnels to the south of Dillywood Lane is more enclosed; the arable farmland and orchard areas more open. The arable farmland to the south west (separated by the A226 and a steep embankment) is distinctly part of the wider green belt farmland extending towards the A289 and beyond. The southern corner of this parcel has recreational sports uses and includes the Rochester City Football Ground. Urbanising influence of A289 to north mitigated by cutting and planted edge.

4.2.2 Purpose and Aims

High contribution to Purpose and Aims of Green Belt.

4.2.3 Boundary anomalies

No boundary anomalies identified.

4.2.4 Washed over and inset areas

No change proposed.

4.2.5 Other Planning considerations

Local Plan Policy Designations

Protection of Open Space Policy L3; Area of Local Landscape Importance Policy BNE34; Rural Lanes BNE44

Relevant Planning Decisions

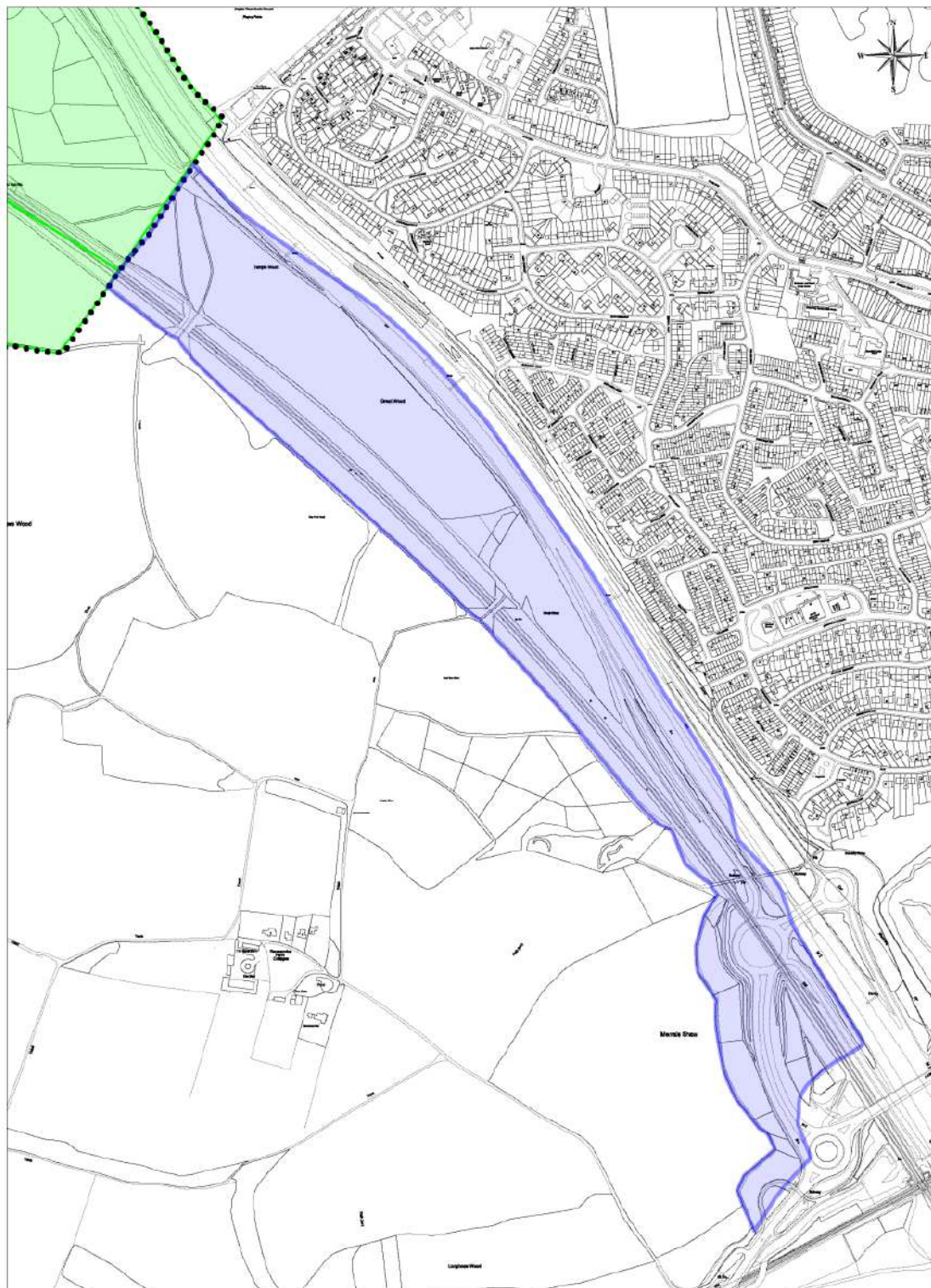
- *Brompton Farm, Brompton Farm Road, Strood, ME2 3QZ*
MC/11/2757 Outline application for demolition of existing farm buildings and construction of 16 dwellings together with access, appearance, layout and scale and associated works. Approval subject to S.106, 04 April 2013
- *No.178 and Land North of Brompton Farm Road, Strood*
MC/16/2917 Outline application with some matters reserved (appearance, landscaping, layout, scale) for residential development comprising of up to 135 residential dwellings with associated landscaping, public open space and associated works. Refusal, 20 January 2017. No appeal.
MC/17/2956 Outline application with some matters reserved (appearance, landscaping, layout, scale) for residential development comprising of up to 122 residential dwellings with associated landscaping, public open space and associated works. Refused 19 April 2018. Appealed.
- *Rochester United F.C., Watling Street*
MC/17/3121 Retrospective application for the construction of a 192 seat stand together with the installation of two portakabins for admin and football academy. Approved with Conditions, 16 April 2018

4.2.6 Results and recommendation

High This contribution is considered to be significant.

Recommendation No change to Green Belt.

4.3 Land Parcel 3



4.3.1 Description

This parcel forms a narrow sliver of land bounded by the M2 and CTRL. The north and south eastern edges of this parcel form the outer Metropolitan Green Belt boundary. Land to the south west conjoins with Parcel 4 and flows into Gravesham to the north west.

Woodland predominates as the land use within this parcel. A motorway underpass provides an important public right of way link from the urban area of Strood to the north into the AONB woodland

and chalk downland to the south. There are permissive rights of way running parallel to the motorway and CTRL line. Urbanising influences include the M2, CTRL line and A228.

As noted in relation to Parcels 1 and 2, this parcel, although assessed independently, should also be considered integrally with Parcels 4 and 5. The parcels have common features that extend into the green belt in neighbouring boroughs to the west and south.

4.3.2 Purpose and Aims

High contribution to the Purpose and Aims of Green Belt.

4.3.3 Boundary anomalies

Boundary anomaly identified along boundary of M2 and slip road. See Section 6.2 (fig. 13) for detail and explanation of proposed adjustments.

4.3.4 Washed over and inset areas

No change proposed here

4.3.5 Other Planning considerations

Local Plan Policy Designations

Kent Downs Area of Outstanding Natural Beauty BNE32 and; North Downs Special Landscape Area BNE33; Designated Country Park L9; Proposed Road Schemes T19, T20

Relevant Planning Decisions

None relevant

4.3.6 Results and recommendation

High This contribution is considered to be significant.

Recommendation No change to principle of Green Belt but minor adjustments to boundary anomalies

Characteristic features of the area include some large blocks of woodland, particularly to the north, as well as areas of grassland and arable farmland. The Reserve is managed primarily for biodiversity conservation and informal public recreation. Active management includes coppicing and management of woodland open space, grazing and other forms of grassland management, and cultivation to favour the rare cornfield wildflowers for which the site is nationally important. Ten miles of paths and ten different entrance points are maintained and kept safe and passable, with substantial lengths open to horse and cycle use. Commercial arable farming remains a significant use of the site, and some commercial rearing of livestock also occurs, both delivered by a tenant farmer.

As noted in relation to Parcels 1 and 2, this parcel, although assessed independently, should also be considered integrally with Parcels 3 and 5. The parcels have common features that extend into the green belt in neighbouring boroughs to the west and south.

4.4.2 Purpose and Aims

High contribution to the Purpose and Aims of Green Belt.

4.4.3 Boundary anomalies

No boundary anomalies identified. Note suggested Parcel 3 changes.

4.4.4 Washed over and inset areas

No change proposed here

4.4.5 Other Planning considerations

Local Plan Policy Designations

Kent Downs Area of Outstanding Natural Beauty BNE32 and; North Downs Special Landscape Area BNE33; Sites of Special Scientific Interest/National Nature Reserve BNE35 (excluding areas below Mean High Water); Designated Country Park L9; Channel Tunnel Rail Link: Safeguarded Route T8; Proposed Road Schemes T19, T20

Relevant Planning Decisions

In recent years a number of planning applications have been submitted and approved for smaller scale developments within the curtilage of the original Ranscombe farmstead.

4.4.6 Results and recommendation

High This contribution is considered to be significant.

Recommendation No change to Green Belt.

4.5 Land Parcel 5

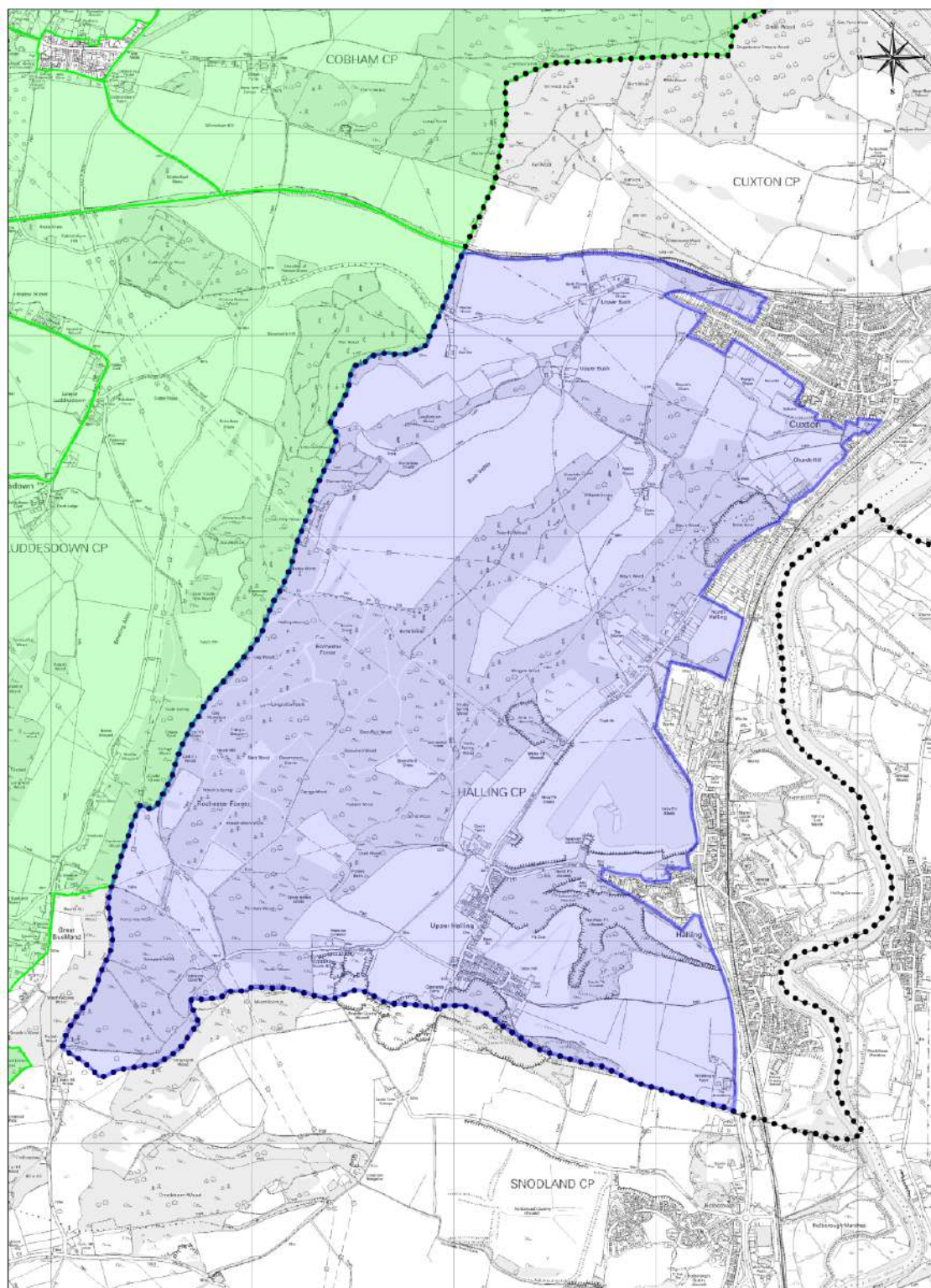


Fig. 8

4.5.1 Description

This is the largest of the three contiguous land parcels (nos 3, 4 & 5). The eastern edges of this parcel bound the A228 and the urban edges of Cuxton and Halling and form the outer Metropolitan Green Belt

boundary. Green Belt land to the south flows into Tonbridge and Malling and to the west into Gravesham.

Large land parcel, characterised by steep wooded scarp slope; arable fields enclosed by strong woodland blocks and wooded shaws; steep rolling dry valleys set within dip slope of North Downs. Other features include Pilgrims way which rises from the A228 at North Halling (where it is fringed with ribbon development) and travels in south westerly direction. Former cement works at North Halling now modern residential development. This is inset from the Green Belt but lake to south and large field to the north are 'washed over'. Large disused and fenced off quarry situated immediately to south of Lower Halling. Another disused quarry (Houlder) located to south of Upper Halling on district boundary with Tonbridge and Malling. Both quarries and the small hamlet of Upper Bush 'washed over' by Green Belt. Urbanising influences predominate to east along Green Belt boundary at A228 and Cuxton/Halling.

4.5.2 Purpose and Aims

High contribution to the Purpose and Aims of Green Belt.

4.5.3 Boundary anomalies

No boundary anomalies identified – note Parcel 3 changes, which are contiguous to this parcel

4.5.4 Washed over and inset areas

It was not considered by the assessors that the open character of Upper Halling makes an important contribution to the openness of the Green belt and that the character of the village could be protected by other means – ie. the village envelope designation. It was noted that similar sizes of settlement within Gravesham are inset. It is recommended that Upper Halling is inset from the Green Belt according to the village envelope boundary.

4.5.5 Other Planning considerations

Local Plan Policy Designations

Upper Bush Conservation Area BNE12, BNE13, BNE14, BNE15; Scheduled Ancient Monument BNE20; Kent Downs Area of Outstanding Natural Beauty BNE32 and; North Downs Special Landscape Area BNE33; Sites of Special Scientific Interest/National Nature Reserve BNE35 (excluding areas below Mean High Water);

Sites of Nature Conservation Interest and/or Local Nature Reserve BNE36 (existing/proposed); Proposed Community Forest or Woodland BNE44; Rural Lanes BNE47

Relevant Planning Decisions

- *St Andrews Park, Formby Road, Halling (Former Cement Works, Halling); Northern Field*
MC/12/1791 Hybrid application for outline details for demolition of existing buildings and provision of employment up to 3,000sqm floorspace (B1, B2, B8), doctors surgery up to 1,000sqm (D1) and/or a 40 unit extra care facility, pub/restaurant up to 850sqm (A3/A4), new pedestrian/cycleway bridge across A228; alterations to public highway; sports pitches and ancillary structures including means of access with all other matters reserved. Full details for 385 residential dwellings including demolition of existing structures, vehicular access and landscaping; open space; nature conservation facilities; ground modelling and earthworks and ancillary buildings. Approval With Conditions, 29 August, 2013

MC/14/1486 Variation of conditions 5, 39 and 40 of planning permission MC/12/1791 - condition 5 to enable changes to the approved residential layout and change 23 of the approved house types; and conditions 39 and 40 to include balancing ponds, foul pumps and revised Flood Risk Assessment as approved under MC/14/0121. Approval With Conditions, 15 August, 2014.

- *98 Pilgrims Road, Upper Halling*

MC/17/3288 Retrospective application for the formation of a riding ménage to the rear. Approved with Conditions, 22 December 2017

- *Land Rear Of 106,108,110,112 and 114 And Adjacent 98 Pilgrims Road, Upper Halling*

MC/17/3788 Retrospective application for construction of an access road and driveway. Approved with Conditions, 18 January 2018

- *Dean Farm Cottage, Bush Road*

MC/18/0236 Change of use from outbuilding to a 2 bedroom dwelling. Refused, 28 November 2018

- *Keepers Barn, Upper Bush Farm Road, Upper Halling*

MC/18/1405 Change of use of redundant agricultural barn to a residential dwelling. Pending Decision

- *M.C.L Ltd, Grove Road, Upper Halling*

MC/18/2040 Outline planning application with some matters reserved (access, appearance, landscaping and scale) for the demolition of existing industrial buildings, builders yard and the construction of 11 dwellings, associated parking, car ports and access. Pending Decision

4.5.6 Results/analysis

Moderate/High This contribution is considered to be significant.

Recommendation Adjustments to 'inset' or 'washed over' status of settlement for further consideration.

A3. EXTRACT FROM GRAVESHAM GREEN BELT STUDY 2018

abuts the urban area of Strood, it plays a role in checking the unrestricted sprawl of large built up areas.

Contribution

Purpose 2 – to prevent neighbouring towns merging

The parcel lies between Gravesend and Strood. The main roads between the two towns (A2, A289 and A226) form the boundaries of the parcel and bisect it. The parcel is part of the narrowest gap between Gravesend and Strood and part of the parcel abuts the latter town. The gaps between Strood and Shorne/Shorne Ridgeway (this parcel and parcels 9 and 10) and between Strood and Higham (this parcel and parcels 5 and 10) are relatively narrow. The gaps further west between Shorne Ridgeway, Shorne and Gravesend (parcels 6, 7, 8 and 9) and Higham, Lower Shorne and Gravesend (parcels 2 and 3) are also narrow. As a result, this parcel, in combination with other parcels, plays a significant role in preventing Gravesend merging with Strood and maintaining the break in built development between them.

Significant Contribution

Purpose 2a – to prevent other settlements in the Green Belt from merging

The parcel abuts Three Crutches, a settlement inset from the Green Belt, but does not adjoin any other rural settlements. This settlement adjoins the Strood urban area and there is an anomaly in that the A2 Watling Street is within the Green Belt. Given this, and the fact that this parcel does not adjoin any other settlements inset from the Green Belt, it has a minimal contribution to this purpose.

Minimal/No Contribution

Purpose 3 – to safeguard the countryside from encroachment

The relative strengths of the parcel boundaries are mixed. The northern boundary is very strong as it follows a major road (A289). The part of the southern boundary which follows the A2 Watling Street also provides a strong boundary. The remaining part of the southern boundary and the eastern boundary are weak as they generally either follow field boundaries or the curtilages of dwellings.

The parcel is mainly arable land and recreational land which are appropriate uses in the Green Belt and contribute to its openness. There are some pockets of urbanising development, particularly around Dillywood Lane/Gravesend Road, which encroach into the countryside and impact on the openness but these generally precede the Green Belt designation. More recently, significant encroachment has occurred as a result of the construction of the A289 Wainscott Bypass, a dual carriageway which bisects the area between Higham and Strood. The A289 lies in a valley which separates this parcel from parcels 5 and 10.

Although there is development within the area, the parcel has a rising topography and retains its open character. Most of it is screened by trees from the surrounding main roads but small parts of it are visible from certain points. As a result, it contributes towards safeguarding the countryside from encroachment and preserving the openness of the Green Belt.

Contribution

Project	Gravesend Road, Strood
Document Title or Subject	Sustainable Transport and Pedestrian Accessibility
Document Reference	107784-PEF-XX-XX-RP-TR-000001
Revision Reference	F01
Date	05.09.2024

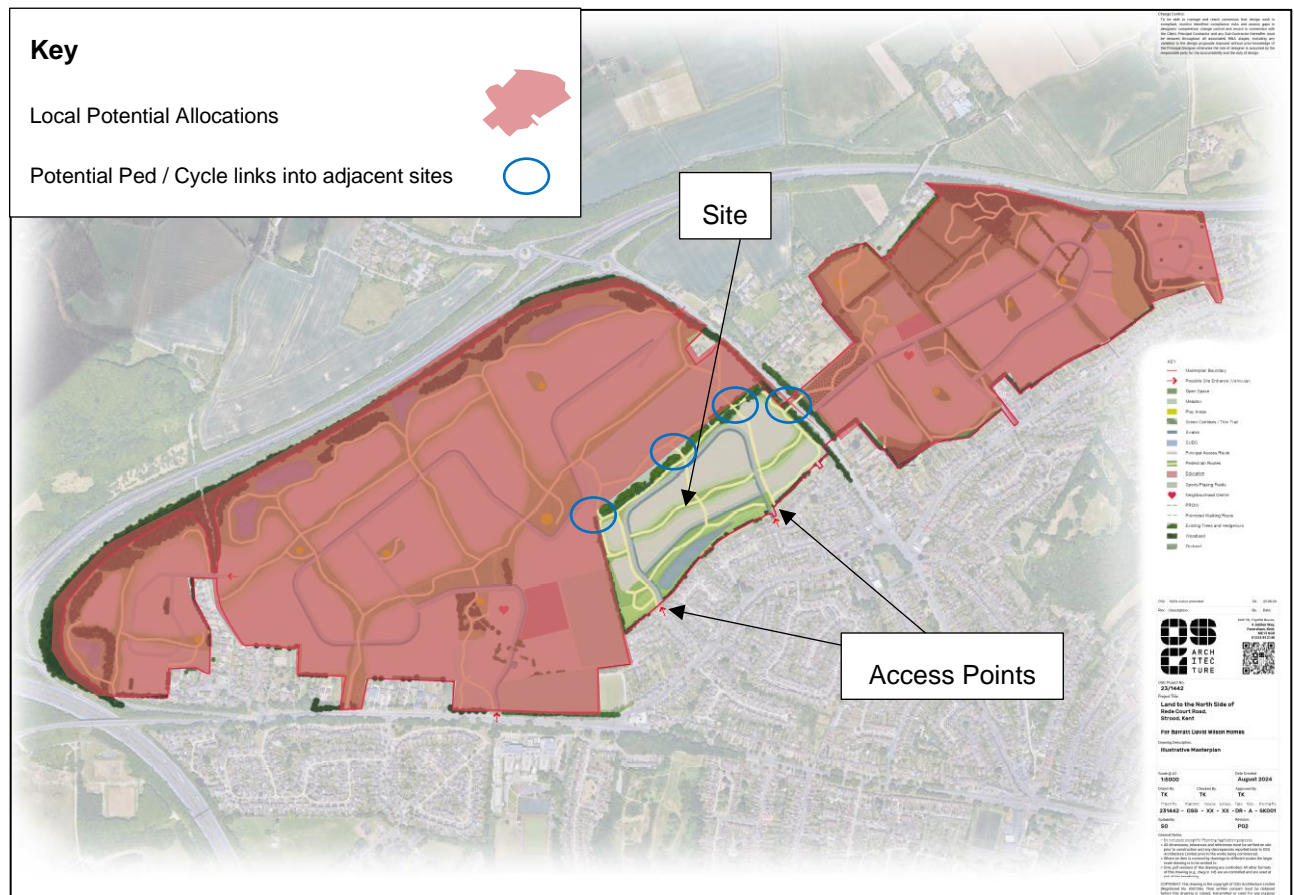
1 Introduction

- 1.1.1 Pell Frischmann is commissioned by Barratt David Wilson Homes (BDW and the 'Client') to provide transport and highways consultancy advice and services in connection with the development known as Chapter Views, Medway, Kent (the 'site'). This Sustainable Transport and Pedestrian Accessibility Report has been prepared to present an appraisal of the site's sustainable transport credentials.
- 1.1.2 The site is located in the administrative area of Medway Borough Council (MBC), the Local Planning Authority (LPA) and the Local Highways Authority (LHA).
- 1.1.3 The purpose of this report is to demonstrate that the site is located in a sustainable location and to identify the measures proposed to complement the scheme from a sustainable transport perspective.

1.2 Site Location and Description

- 1.2.1 The site is situated within Medway on the north-west urban edge of Strood, adjacent to the boundary with Gravesham Borough. The site is currently undeveloped greenfield site and lies adjacent to an existing residential development accessed off Rede Court Road. The site has field edge boundaries of hedge/tree planting to the north, east and west of the site. Access is provided to the south as shown in Figure 1.1 below.

Figure 1.1: Masterplan

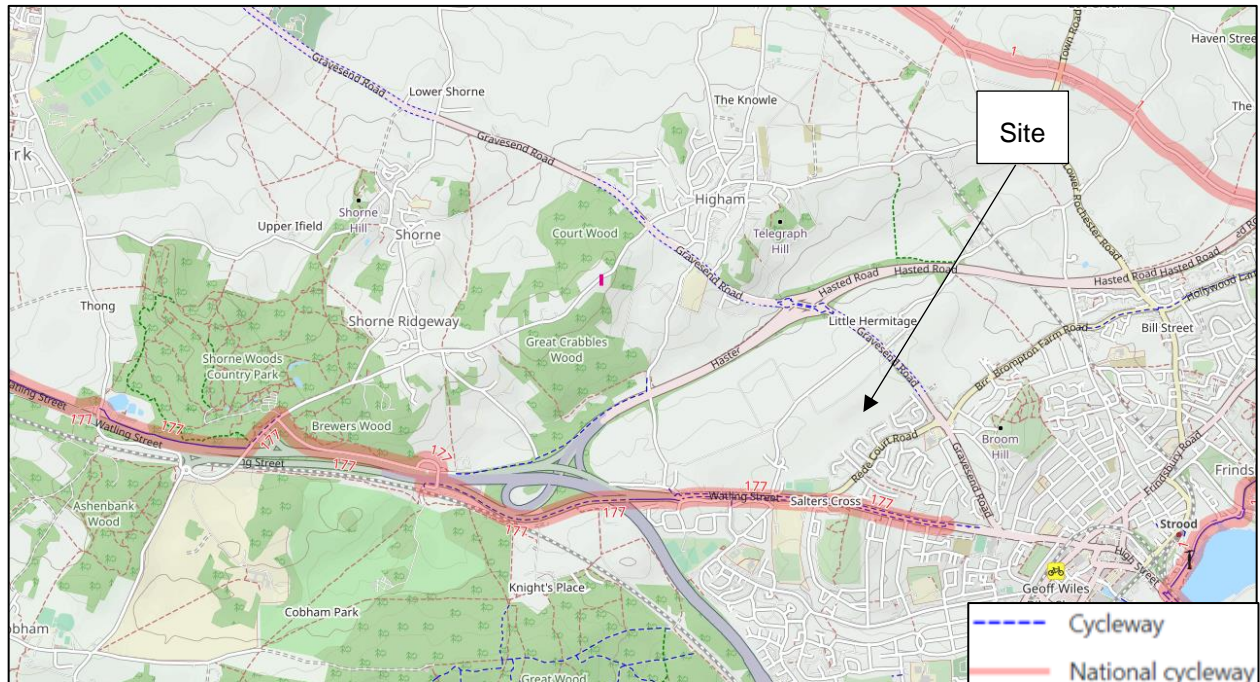


2 Baseline Conditions

2.1 Walking and Cycling Accessibility

- | | |
|-------|--|
| 2.1.1 | The area south of the site is predominately residential and most properties have private driveways; otherwise, no on-street parking restriction apply. The speed limit is 30mph and footways are provided on both sides of the roads. The residential area is suitable for both pedestrian and cyclist use. The surrounding residential roads all connect with Rede Court Road (B2108), which in turn links with Watling Street (A2) to the west and Gravesham Road (A226) to the east. |
| 2.1.2 | Walking infrastructure around the site is generally well maintained with street lighting provided on all roads surrounding the site. The A2 Watling Street has wide footways / cycleways on both sides of the road which are segregated from the road by grass verges. Side roads are also provided with dropped kerb and tactile paving for the benefit of less able users. There are a number of crossing points along the A2 including a full signalised toucan crossing (cycle and pedestrian) located at the junction with the B2108 as well as an uncontrolled crossing next to the Parkfields junction. |
| 2.1.3 | Pedestrian infrastructure along Gravesend Road is provided in the form of a footway along the eastern side of the road. Footway widths are more limited to the north as it passes through undeveloped land and tend to increase to the south near the southeast corner of the site. It is also noted that dedicated, mandatory cycle lanes are provided on both sides of the road. |
| 2.1.4 | Existing cycle infrastructure along Watling Street and Gravesend Road provides connections to local facilities as well as links to further cycle routes in the area of Rochester and Gravesend as shown in Figure 2.1. |

Figure 2.1: Cycle Network



OpenStreetMap – www.openstreetmap.org

2.2 Public Transport Accessibility

Bus Services

- 2.2.1 There are several bus stops within walking distance to the proposed site access points. These are located on Gravesend Road and Rede Court Road and are served by the 172, 174, 190, 668, 673, 674, 694 bus services. Whilst most of these routes are school bus services, the 190 service running from the Dillywood Lane bus stops on Gravesend Road provides is the predominant bus service with 3 buses per hour between Gravesend and Chatham Bus Station. A full breakdown of the frequency and routing of these services is provided in

2.2.2 Table 2.1. The bus stops at Gravesend Road along with the full 190 bus route is provided in Figure 2.2.

Table 2.1: Bus Service provided from the site

Service	Route	Frequency		
		Monday – Friday	Saturday	Sunday
172	Chatham Bus Station – Rochester Train Station – Strood – Wainscott	3 buses per day	-	-
174	Brompton Farm Road – Strood – Rochester Railway Station – Chatham Bus Station	1 bus at 0918	-	-
190	Gravesend – Strood – Rochester – Chatham Bus Station	3 bph	3bph	1bph
663	Cliffe – Strood – Rochester Grammar Schools	1 bus per day in each direction (school service)	-	-
668	Chalk North Kent College – Strood – Rochester Grammar Schools	1 bus per day in each direction (school service)	-	-
673	Cuxton – Strood – Frindsbury – Hundred of Hoo Academy	1 bus per day in each direction (school service)	-	-
674	Brompton Farm Road – Strood – Frindsbury – Maritime Academy	1 bus per day (school service)	-	-
694	Higham Forge Lane – Wainscott – Strood – Rochester Grammar Schools	1 bus per day in each direction (school service)	-	-

Figure 2.2: 190 Bus Route



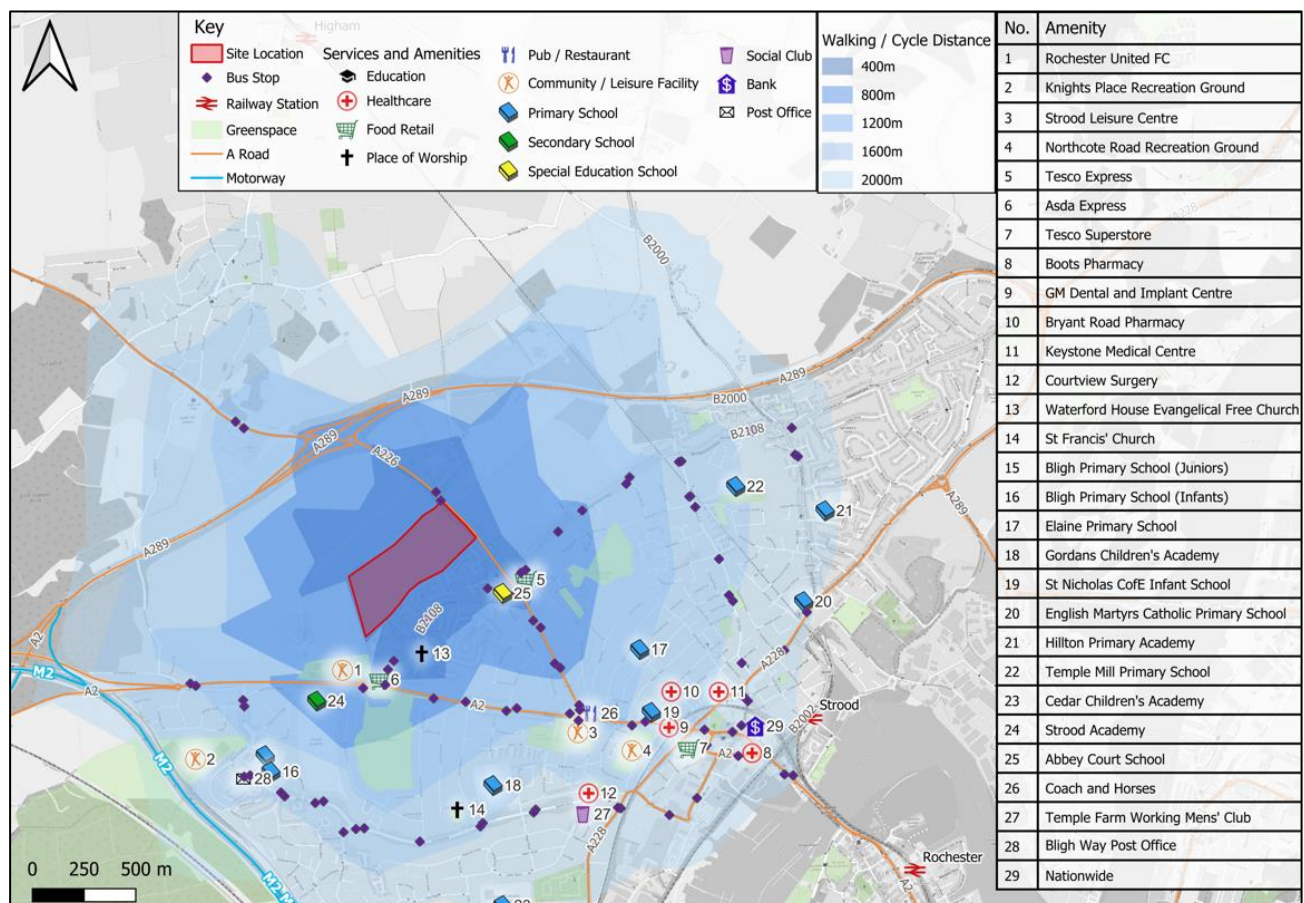
Rail services

- 2.2.3 The nearest railway station to the site is Strood, approximately 2.6km (approx. 8-minute cycle) south east of the site. Strood station is served by Southeastern and Thameslink services and provides frequent trains to many destinations throughout southeast England and the wider area including Luton, Ramsgate, Faversham and Paddock Wood. There is also a high-speed service which provides access from Strood to London St Pancras in 33 minutes.
- 2.2.4 Strood railway station provides step free access to all platforms and there are 3 accessible parking spaces available in the station car park. There are also 40 cycle parking spaces provided at the front of the station.

2.3 Services and Amenities

- 2.3.1 There is a range of services and amenities available within walking distance to the site including schools, supermarkets and leisure facilities. Figure 2.3 displays the services and amenities available within a 2km walking / cycling distance from the site access points. It is important to note that several other services and amenities within Chatham can be reached directly from the site via the 190 bus service as The Pentagon shopping centre is a short walk from Chatham bus station.

Figure 2.3: Services and Amenities



Source: OpenStreetMap with Pell Frischmann annotations

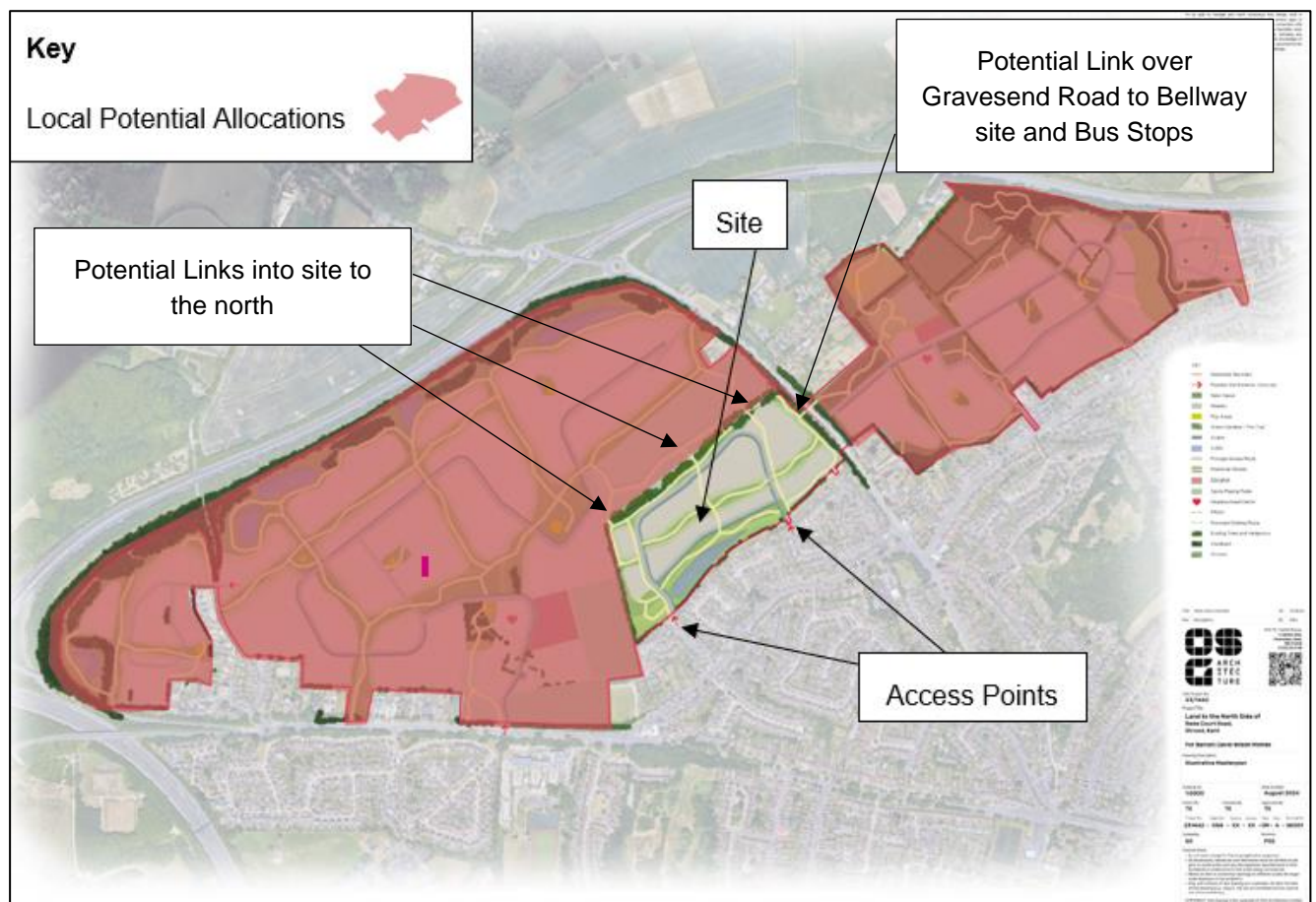
- 2.3.2 Figure 2.3 above shows that all key amenities and local facilities can be accessed within 2km of the site, including primary and secondary schools.
- 2.3.3 Overall the site is very well served by an array of services and amenities which give it excellent sustainable credentials with the majority of trips being able to be made by either active or sustainable transport modes.

- 2.3.4 As noted previously, Strood railway station is approximately 2.6km away from the site but easily accessible by either bus or bicycle.

3 Development Proposals

- 3.1.1 The proposed masterplan is shown in Figure 3-1 below, alongside connections into the wider existing transport network and the neighbouring potential allocations.
- 3.1.2 It is proposed to provide circa 350 homes at the new development, connecting down through the existing residential housing to the south.

Figure 3.1: Masterplan



3.2 Sustainable Transport Measures

Link to Bus Stops / Wider Area

- 3.2.1 A proposed link between the Bellway site and the proposed development will be investigated. An informal crossing facility would be needed for people crossing Gravesend Road, this would provide the most direct link between the two sites. This link would also have the benefit of allowing a shorter route to the buses that use service on Gravesend Road.
- 3.2.2 The site also has the potential to provide links from the site to the north, facilitating permeability across the wider area.

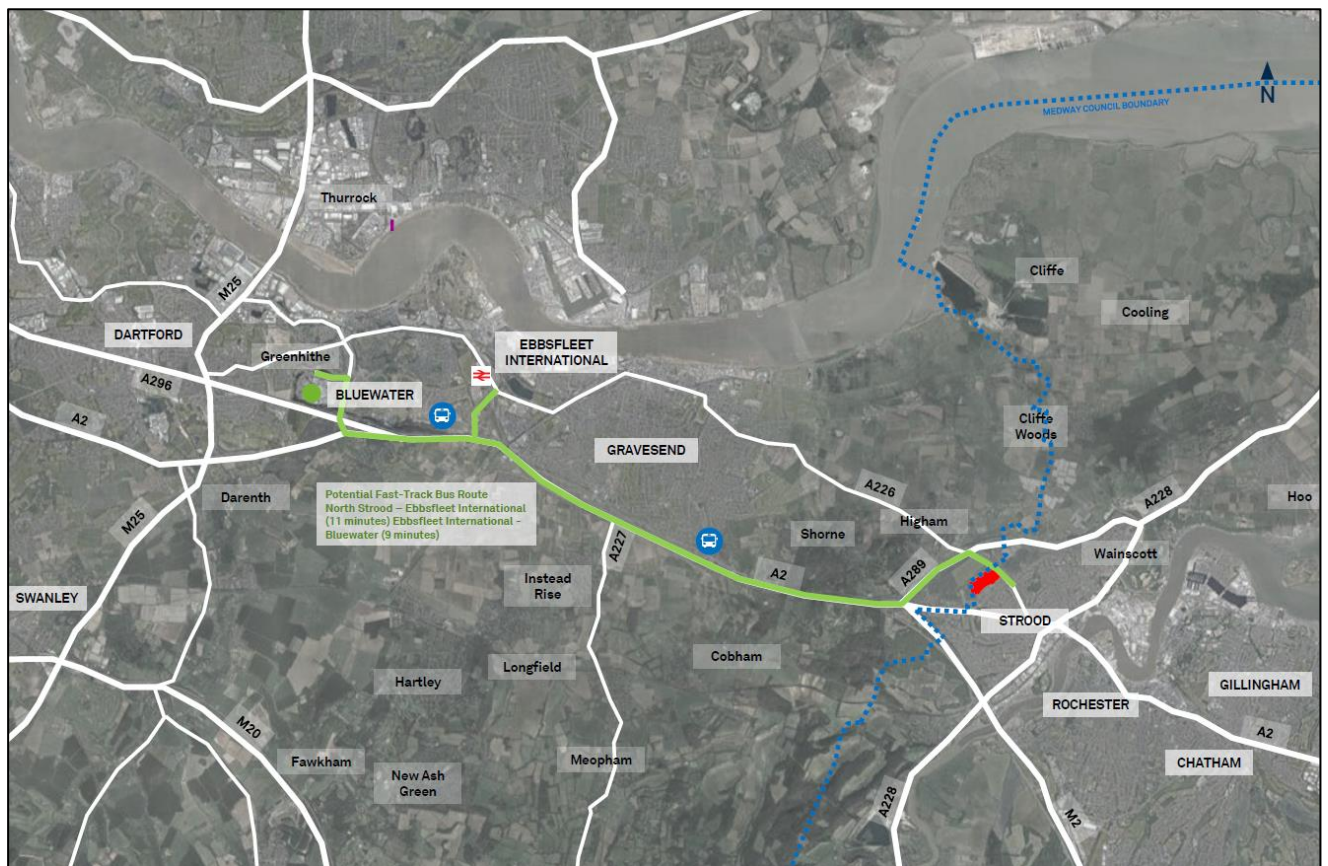
Future Bus Connections

- 3.2.3 Chapter Views (shown in red) is arguably the best connected strategic site within Medway District. Situated on the western edge of the District, the site has good links to London and the rest of the country, and has excellent

accessibility to both the primary highway network and the key strategic public transport nodes of Ebbsfleet International and Bluewater.

- 3.2.4 Given the congestion that affects the M2, there is a necessity to achieve high model split at strategic growth locations in Medway and North Strood provides greater scope to do this than anywhere else in the District.
- 3.2.5 The existing public transport, walking and cycling networks in the locality ensure that growth can be well integrated into Strood, whilst the critical mass of major development provides the scope to unlock a new fast-track route connecting North Strood with Ebbsfleet and Bluewater to provide residents with a healthier, faster, more sustainable and cheaper mode of commuting to London than parking a car at Ebbsfleet Station.

Figure 3.2: Masterplan



Mobility Hub

- 3.2.6 Provision of mobility hubs on site creating opportunities for more sustainable modes of travel to the existing community facilities. The types of facilities could include shared mobility opportunities, real time travel information, wayfinding, Amazon style lockers, cycle parking and car clubs.

Hard Measures:

- A comprehensive internal network of pedestrian routes and cycle access from multiple external points to integrate the Proposed Development with the surrounding highway network and local developments.
- Street lighting to provide a safe urban environment for road and footway users.
- Open green space and walking routes within the landscaped parts of the site to encourage leisure use.
- Provision of cycle parking in line with Medway Council's relevant standards to ensure users who wish to do so can keep and use bicycles.
- Broadband infrastructure throughout to enable home working both reflecting emerging trends in remote work and reducing the need to commute to a workplace.

Soft Measures:

- Appointment of the Travel Plan Coordinator (TPC) to be a trained single-point-of-contact for managing and promoting a Ramework Travel Plan (FTP) and FTP objectives.
- Sales material and training of sales/management staff promoting accessibility to the Site by active travel modes, in hard and online forms, as appropriate.
- A Travel Pack will be provided to all new first occupiers alongside their 'welcome pack' to raise awareness of the FTP, sustainable transport initiatives being implemented through the FTP, and public transport and active travel connectivity to/from the Site.
- Provision of public transport promotion information, including timetable, fare and route information to encourage uptake (and reinforce use) of public transport.
- Promotion of walking and cycling including provision of route maps and distances to key destinations and facilities.
- TPC to engage with a car club operator to investigate the scope for providing a car club vehicle within the Proposed Development.
- Car share promotion, including the promotion of local car share coordination services (such as Kent & Medway Liftshare) through the Occupier Travel Pack.
- Supporting the implementation of local, regional and national sustainable travel campaigns at the Proposed Development; e.g. National Bike Week.
- Biannual newsletter for residents/occupiers during the active years of the FTP, detailing progress towards targets, results of monitoring and promoting new and existing initiatives.
- Travel website and social media: The TPC will explore and maintain online communication methods appropriate in the evolving digital landscape so that residents/occupiers know where they can go for multi-modal travel information relevant to the Site, and can find further information about the FTP, incentives and measures available to them.

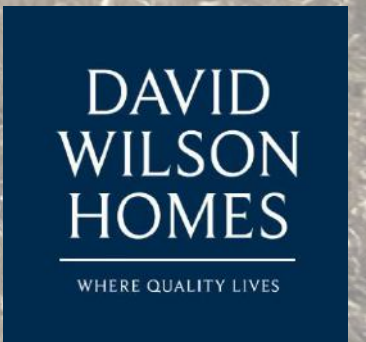
3.2.7 It is considered that these measures could reduce total car trips by circa 10%.

4 Summary and Conclusions

- 4.1.1 Pell Frischmann is commissioned by Barratt David Wilson Homes (BDW and the 'Client') to provide transport and highways consultancy advice and services in connection with the development known as Chapter Views, Medway, Kent (the 'site'). This Sustainable Transport and Pedestrian Accessibility Report has been prepared to present an appraisal of the site's sustainable transport credentials.
- 4.1.2 The area south of the site is predominately residential and most properties have private driveways; otherwise, no on-street parking restriction apply. The speed limit is 30mph and footways are provided on both sides of the roads. The residential area is suitable for both pedestrian and cyclist use. The surrounding residential roads all connect with Rede Court Road (B2108), which in turn links with Watling Street (A2) to the west and Gravesham Road (A226) to the east.
- 4.1.3 The area south of the site is predominately residential and most properties have private driveways; otherwise, no on-street parking restriction apply. The speed limit is 30mph and footways are provided on both sides of the roads. The residential area is suitable for both pedestrian and cyclist use. The surrounding residential roads all connect with the B2108, that links with Watling Road (A2) to the west and Gravesham Road to the east.
- 4.1.4 There are a number of bus stops serving the site and the station is approximately 2.6km from the site.
- 4.1.5 Overall the site is very well served by an array of services and amenities which give it excellent sustainable credentials with the majority of trips being able to be made by either active or sustainable transport modes. A series of additional measures have been considered which could further enhance the sustainability of the site.

Chapter Views

Vision Document



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September 2024

Introduction

This Vision Document has been prepared to set out the objectives and vision for design proposals for the provision of new homes on land at Chapter Views (situated to the north of Rede Court Road, Strood) in response to Medway Council’s Regulation 18 Consultation 2024. Within the document we will be responding to the key elements of assessment criteria to support this sites inclusion within the new Local Plan as a suitable, viable, deliverable opportunity to provide high quality sustainable new homes in the area.

A team of consultants have reviewed the site focusing on technical aspects including flood risk, drainage, ecology, landscaping and access to identify elements for careful consideration and those which create opportunities for development.

These elements inform the design process, creating a framework of parameters to form the basis of an illustrative masterplan design, paying special attention to existing residential properties and the town/countryside edge character of the site. This will provide a unique opportunity to address the differing land-use characteristics within the design proposals.

The site is being promoted by Barratt and David Wilson Homes (BDW Kent). Held by a sole landowner, Chapter Views forms part of the larger Chapter Farm, which bridges the boundary between Medway Unitary Authority and Gravesham Borough Council. The site is located wholly within Medway and adjoins the neighboring local authority. The adjoining site within Gravesham Council is also being promoted for development and has a draft allocation within Gravesham's emerging Local Plan. As well as the adjoining site, the site to the east on the Gravesend Road is also being promoted. As such, Chapter Views has the potential to form part of a wider sustainable extension to the north of Strood.

Chapter Views lies within an Area of Local Landscape Importance and lies on the edge of the Metropolitan Green Belt but is free from further planning constraints within the current Local Plan. This document contains a review of the policies and circumstances surrounding release of land within the Green Belt, and proposals for this site would seek to deliver a sensitive transition between the urban edge of Strood and the open countryside – meaning that the above designations should not preclude this site from allocation within the new Local Plan.

In summary, based upon the opportunities and considerations identified within this document and supporting reports, the site has the potential to deliver circa 350No. new energy efficient homes set within areas of public open space providing opportunities to deliver 10% BNG (biodiversity net gain) as well as creating play areas and new enhanced landscape features for future residents to enjoy.

Our Vision for a New Sustainable Community

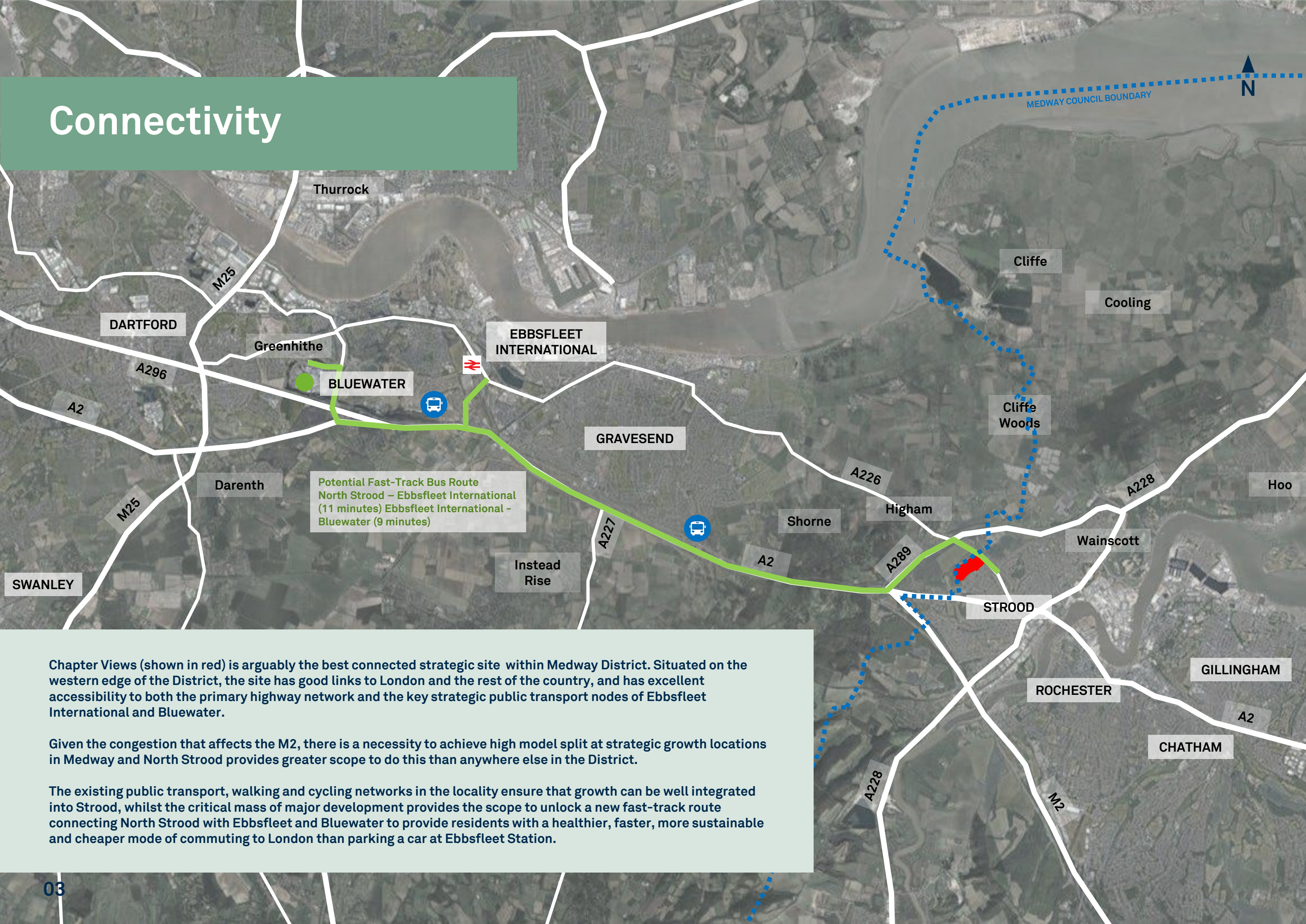
Chapter Views presents an excellent opportunity to create a highly sustainable community on the edge of Strood. With close links to Strood town centre, employment opportunities, schools and community facilities, the site would allow for the natural expansion of the town whilst providing a sensitive transition from the existing hard urban edge to open countryside.

Proposals for Chapter Views have the potential to deliver:

- A vibrant, sustainable, landscape led scheme – a natural expansion of Strood, utilising the wealth of local services;
- A scheme with a strong sense of place, with residents feeling a sense of pride and ownership in the community that they live in;
- A network of green spaces creating spaces for people to enjoy and children to play in – whilst reinforcing existing habitats and creating new green corridors through the site;
- Access to the site with improved pedestrian and cycle routes, and easy access to the existing public transport network encouraging residents to minimise their use of vehicles;
- A range of family sized housing plots and tenures, including policy compliant affordable housing provision;
- An attractive successful and sustainable scheme with social, economic and environmental benefits at the core of the proposals;
- Integration with the existing community, improving connectivity in the area and sharing access to green spaces and amenities.



Connectivity



Chapter Views (shown in red) is arguably the best connected strategic site within Medway District. Situated on the western edge of the District, the site has good links to London and the rest of the country, and has excellent accessibility to both the primary highway network and the key strategic public transport nodes of Ebbsfleet International and Bluewater.

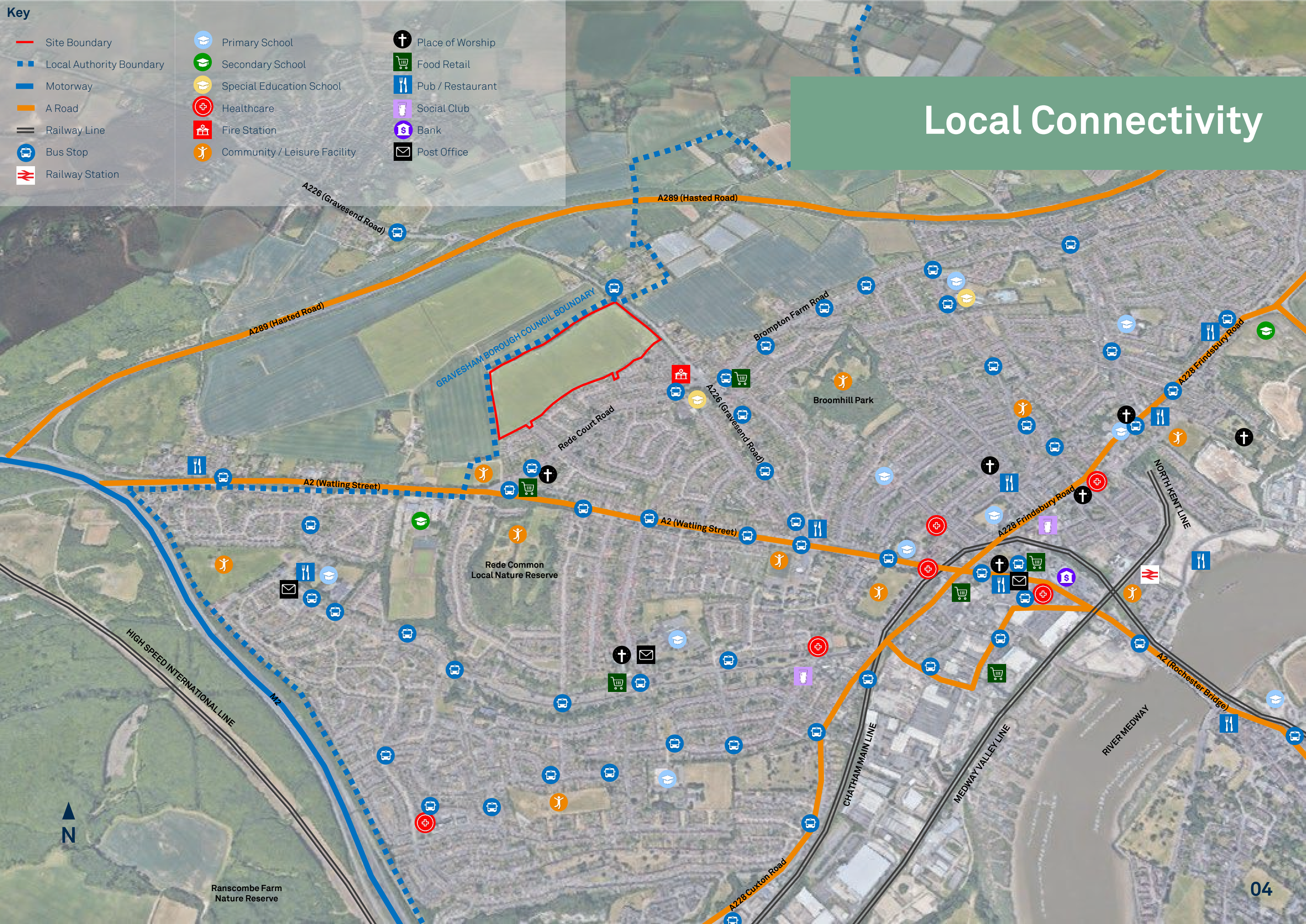
Given the congestion that affects the M2, there is a necessity to achieve high modal split at strategic growth locations in Medway and North Strood provides greater scope to do this than anywhere else in the District.

The existing public transport, walking and cycling networks in the locality ensure that growth can be well integrated into Strood, whilst the critical mass of major development provides the scope to unlock a new fast-track route connecting North Strood with Ebbsfleet and Bluewater to provide residents with a healthier, faster, more sustainable and cheaper mode of commuting to London than parking a car at Ebbsfleet Station.

Key

- Site Boundary
- Local Authority Boundary
- Motorway
- A Road
- Railway Line
- Bus Stop
- Railway Station
- Primary School
- Secondary School
- Special Education School
- Healthcare
- Fire Station
- Community / Leisure Facility
- Place of Worship
- Food Retail
- Pub / Restaurant
- Social Club
- Bank
- Post Office

Local Connectivity



The Site

The site is situated on the north-west border of Strood, adjacent to the boundary with Gravesham Borough Council. Currently agricultural land, Chapter Views lies north of existing residential development (off Rede Court Road) and is enclosed by the A226 (Gravesend Road) to the east with the field edge boundaries of hedge/tree planting to the north and west. The site area is 16.3 hectares (40.3 acres).

The site is well located with opportunities for vehicular access to Rede Court Road and the A226 Gravesend Road, with onward connections to the A2/M2 and London and the wider county. The site is close to public transport connections with regular bus services across the Medway Towns and good pedestrian/cycle links to the local schools, the town centre and Strood train station (1.6 miles).

Train services operate from the town centre with Southeastern offering services to Maidstone and Tonbridge, (via the Medway Valley Line), and to Ramsgate and London via the main line – high speed services operate from Strood providing access to London St Pancras in 35 minutes. Thameslink trains also operate from this station providing services to London (1.45 hours) and Luton airport (2.5 hours).

Chapter Views is well located to take advantage of the local facilities and amenities, with sports, parks and leisure facilities within easy walking distance from the site.



Aerial View of the Site © Google Earth



08 minutes to Town Centre Facilities
08 minutes to Strood Railway Station
30 minutes to Medway Maritime Hospital



25 minutes to Town Centre Facilities
35 minutes to Strood Railway Station
45 minutes to Rochester Railway Station



From Strood Railway Station:
25 minutes to Maidstone Railway Station
33 minutes to London St Pancras (High Speed)
65 minutes to Margate Railway Station



10 minutes to Town Centre Facilities
15 minutes to Strood Railway Station
35 minutes to Bluewater Shopping Centre
45 minutes to Medway Maritime Hospital



08 minutes to Town Centre Facilities
10 minutes to Strood Railway Station
15 minutes to Bluewater Shopping Centre
20 minutes to Medway Maritime Hospital

Site Photographs

- 01 – View of possible site access from Clinton Avenue
- 02 – View of possible site access from Beaufort Road
- 03 – View towards rear of Carisbrooke Road & the site
- 04 – View across site towards Fountain Road
- 05 - View across the site from existing site access



The Site

Creating a Highly Sustainable Community

The vision for the site is to create a new highly sustainable community on the edge of Strood. A strategy for sustainability should be at the heart of the design proposals to support future residents – focussing on climate change mitigation, adaption, health and well-being aspects within a sustainable location to create a new community at Chapter Views.

With close links to Strood town centre, employment opportunities, schools and community facilities, the site would benefit from access to the existing public transport network and help provide residents with opportunities to travel using more sustainable methods than by private car.

Proposals for Chapter Views have the potential to deliver:

- Vibrant, sustainable, landscape led scheme – a natural expansion of Strood, utilising the wealth of local services;
- Access with improved pedestrian and cycle routes, and easy access to the existing public transport network – encouraging residents to minimise private vehicle use;
- Integration with the existing community, and possible neighbouring sites, improving connectivity in the area and sharing access to green spaces and amenities – creating spaces for people to enjoy and children to play in – whilst reinforcing existing habitats and creating new green walking corridors through the site;
- The creation of mobility hubs providing residents with opportunities to gain access to information and booking facilities for public transport services, e-bike hire or car club vehicles, as well as creating hubs for cycle parking, e-cycle charging and delivery service lockers – with the aim of encouraging residents to reduce private vehicle use in favour of more sustainable methods of transport;
- Located within a 3-minute walk of homes on the primary access routes, mobility hubs could also create further opportunities for community focussed activities such as nature walks/trim trail, education opportunities or maybe just a place to meet, as well as having the potential to become a key part of the sustainability network. Green roofs, photovoltaic panels and habitat enhancing features such as bee/insect hotels, bird nesting and bat roosting boxes could have the potential to boost biodiversity and reduce energy consumption on site.



Sustainability



As mentioned previously Chapter Views presents an excellent opportunity to create a highly sustainable scheme of energy efficient new homes. With close links to Strood town centre, employment opportunities, schools and community facilities, the site would benefit from access to the existing public transport network and help provide residents with opportunities to travel using more sustainable methods than by private car.

Proposals for Chapter Views will aim to include:

- High quality design ensuring all homes meet the criteria of Building for a Healthy Life (BfHL) scheme;
- The use of passive and active measures to increase energy efficiency, starting with a fabric first approach;
- Homes orientated to take advantage of solar gains, with large opening sizes and areas of space around the units to allow good levels of daylight to habitable rooms. The use of solar shading devices, overhangs or movable shutters will assist in reducing overheating;
- The use of renewable technologies such as photovoltaic panels or heat pumps;
- The installation of high-speed data infrastructure to all homes;
- Water efficient sanitaryware and appliances installed throughout the scheme reducing water usage by residents;
- A scheme for Sustainable Urban Drainage (SUDs) across the site, utilising rainwater attenuation and reducing surface water run-off;
- Electric Vehicle (EV) charging points to all dwellings and within communal parking areas;
- Community contributions and infrastructure levy payments to help fund infrastructure projects and improve local communities – schemes such as new roads, improvements to busy junctions, or expansions to GP surgeries and local schools.

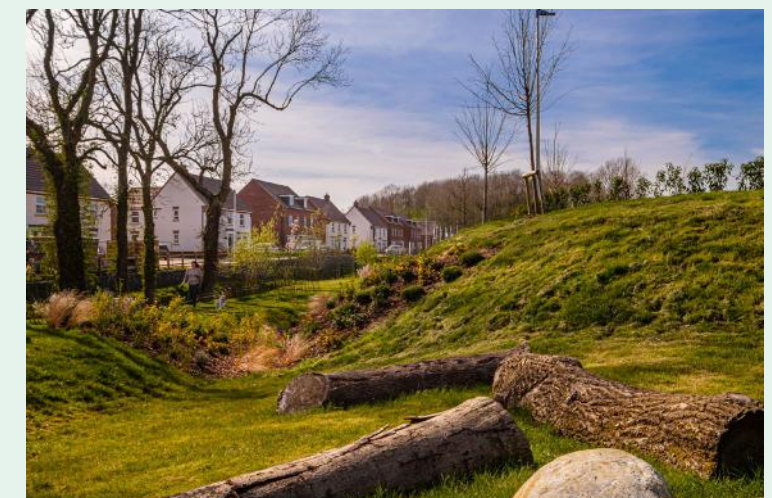
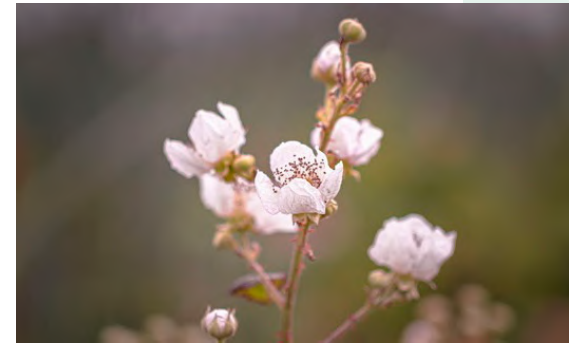


Landscape & Ecology

The Vision for Chapter Views is to create a new residential community which is rooted in the locality, with design principals reflecting the local vernacular in terms of architecture and landscape – creating a strong sense of character and place.

The Green and Blue Infrastructure of the site will help to deliver this vision for the residents of Chapter Views and provide opportunities for existing residents in the area to utilise the open space amenities on site whilst preserving and enhancing ecological value, resulting in a minimum 10% Biodiversity Net Gain (BNG) on site. The proposals will aim to include:

- The retention and enhancement of the existing line of trees, scrub and hedgerows bordering the site, replacing non-native hedges with native species planting to increase habitat opportunities on site;
- The creation of grassland areas for amenity targeting good condition to increase attractiveness to invertebrates;
- Insect houses, log piles and compost heaps to increase insect diversity, reptile refugia/hibernacula provided in retained hedgerow and grassland areas; and hedgehog highways across the site;
- Tree mounted bat roosting and bird nesting boxes should be provided, as well as roosting pockets in retained hedgerow areas to support other habitat enhancements integrated into the built form;
- Scattered tree planting, wildflower meadows, or areas of woodland planting should be considered within future landscaping schemes;
- Exercise and play opportunities should be provided, trim trails, informal and formal play spaces should all be considered;
- Sustainable urban drainage solutions (SUDs) – infiltration basins, swales and wildlife ponds of varying depths – adding to the biodiverse habitats on site and residents' enjoyment;
- A landscape management plan to cover the site ensuring wildlife habitats are protected and leisure areas can be enjoyed by residents in harmony with nature.





Green Belt Review

Whilst the site is technically located in the Green Belt, it is important to understand that the context of the site is significantly changing, with the adjoining land being identified as an allocation, which would see its release from the Green Belt in Gravesham Borough Council Regulation 18 Local Plan. This would surround the site with development, to the north and west (proposed allocation) and south of the site (existing development) and erode the purpose and aims of the Green Belt in this location.

We have undertaken an appraisal of the Green Belt land within Medway and the eastern edge of Gravesham Borough, to strategically consider the most suitable land for release and development.

Most of the land within the Green Belt in the south-west of Medway lies within the Kent Downs National Landscape, which provides a clear constraint to development. We consider four parcels of Green Belt land outside of the National Landscape: two to the north of Strood, and two in the vicinity of Halling. Our appraisal found that the land most suitable for release from the Green Belt for development, is the land to the north-west of Strood.

The junction of the M2/A2 and A289 would form readily identifiable and permanent boundaries between the settlement of Strood and the wider countryside beyond, thereby limiting the potential for development to be seen as sprawl, and also curtailing further expansion of development into the countryside. The land here plays no role in separating towns, as Higham is not a town, and in any case, the A289 and its wooded corridor forms a very clear separating feature between these settlements. The land north-west of Strood does not contribute to maintaining the setting or special character of a historic town.



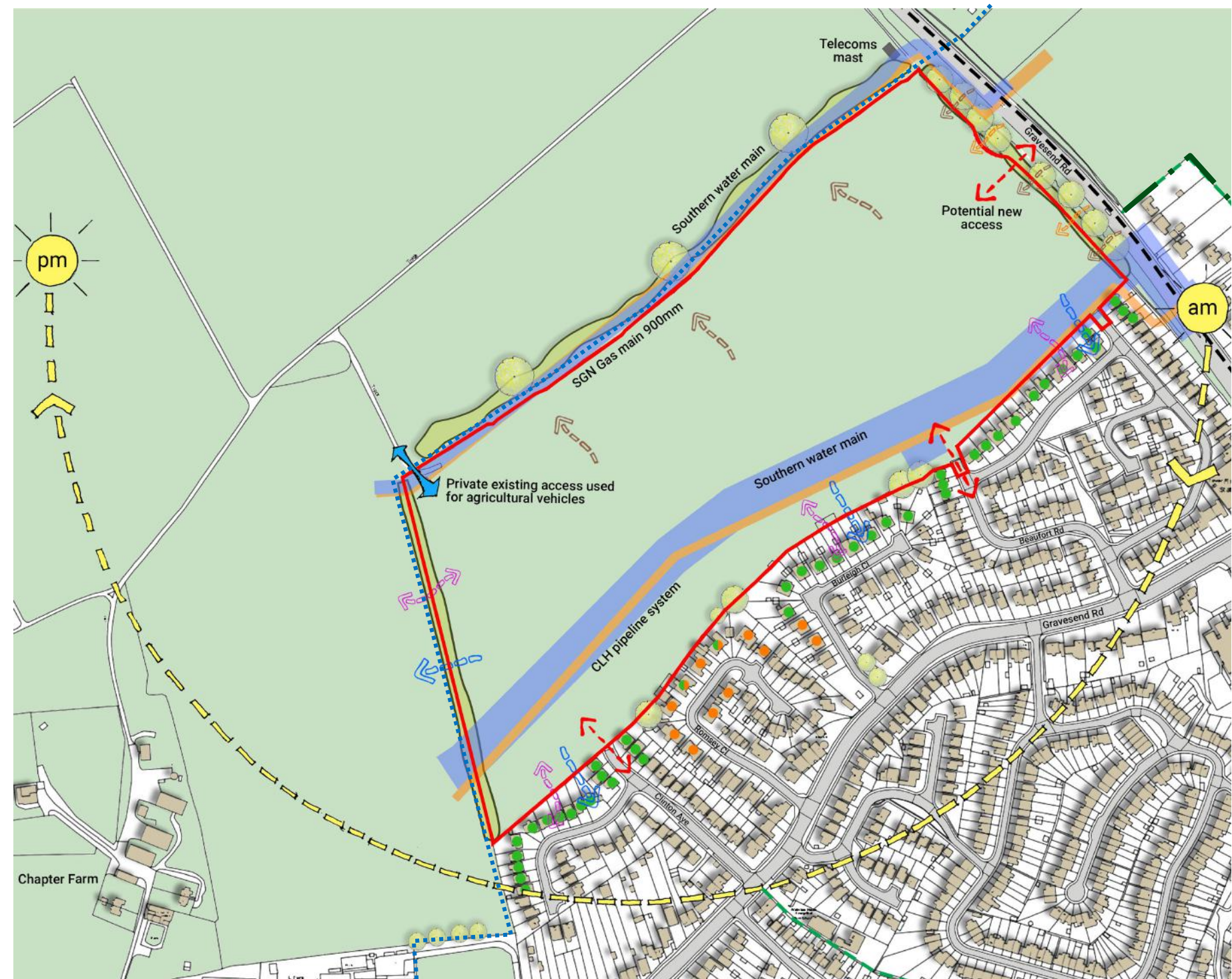
Considerations

Following the analysis work carried out by the consultancy team, we were able to identify key opportunities and considerations for the site which will help to shape the proposals. These elements allow the design to respond to the site, the local vernacular and character of the surroundings to create a successful scheme rooted in the locality adding to the sense of place.

Opportunities and considerations will help to create a series of frameworks for the development looking at green infrastructure, movement and land use to create a design parameters plan for the future development.

Proposals for Chapter Views should consider:

- The sloping topography of the site;
- The location of the site within the Metropolitan Green Belt;
- The site's proximity to the Gravesham Borough Council boundary;
- Existing trees and hedgerows to three sides;
- Existing utilities on site;
- Relationship to existing properties north of Rede Court Road (Cobb Close, Clinton Avenue, Romsey Close, Burleigh Close, Beaufort Road, Fountain Road and Carisbrooke Road);
- Possible traffic noise from the A226 (Gravesend Road) and A289 (Hasted Road);
- Level changes between the site and the A228 (Gravesend Road);
- Views to/from the site including long glimpsed views from Higham.



Key

	Site Boundary		Existing trees and hedgerows		Gas Pipeline & Easement		Potential Noise
	Local Authority Boundary		Public Right of Way		Storey Height (1.5)		Existing Pedestrian Access
	Agricultural Land		Telecommunications Mast		Storey Height (2)		Existing Vehicle Access
	Residential Properties		Water Main & Easement		Views Out		Possible Vehicular Access
	Topography (slopes up)		Oil Pipeline & Easement		Views In		

















Opportunities

Chapter Views site also offers opportunities to create an attractive and deliverable scheme for new homes:

- The creation of a new community rooted in the local vernacular, which will act as a transition between the hard urban edge and the open countryside beyond;
- A natural landscape buffer already exists on site, creating an opportunity to reinforce and protect this existing landscape feature and enhance biodiversity on site;
- Ecological enhancements will aim to include wildflower meadows, natural species tree and hedgerow planting, SUDS ponds and green corridor networks;
- The site is enclosed on four sides by physical and natural borders, reducing the visibility and impact of the development on the surrounding area;
- Provision of a variety of green spaces for residents to use, with landscape buffers and expanses of open space reducing the impact of the development on the wider area;
- Opportunities for the provision of formal and informal play areas, and informal exercise opportunities for residents through the provision of a circular walk;
- Expansion of pedestrian and cycle connections through the site linking the existing residential properties to Chapter Views and onwards to Higham – reinforcing non-vehicular access to local facilities and amenities;
- Provision of mobility hubs on site creating opportunities for more sustainable modes of travel to the existing community facilities;
- Potential new vehicular access utilising existing access points in Clinton Avenue and Beaufort Road, as well as potential pedestrian access from Gravesend Road.

Key

- | | | | | | |
|---|----------------------------|---|---------------------------|---|------------------|
|  | Site Boundary |  | Possible Vehicular Access |  | Landscape Buffer |
|  | Local Authority Boundary |  | Main Access Route |  | Green Corridors |
|  | Agricultural Land |  | Pedestrian /Cycle Route |  | Play Area |
|  | Existing trees & hedgerows |  | Views In |  | SUDS |
|  | Public Right of Way |  | Views Out | | |

Concept Development

Green Infrastructure

- Retention of existing trees & hedgerows;
- Landscape buffers (reinforce and create biodiverse habitats);
- Open space buffers (wildflower meadow);
- Green corridors (native tree and hedgerow planting);
- Street trees to defined routes;
- Formal & informal play opportunities.



Movement Infrastructure

- Pedestrian and cycle routes through the site;
- New vehicular access with pedestrian/cycle connectivity;
- Easy access to public transport services;
- Trim trail for informal exercise opportunities.



Blue Infrastructure

- Sustainable urban drainage features;
- Infiltration basins and swale network;
- Surface water attenuation on site;
- Wildlife ponds with aquatic plant species.



Design Parameters

- New homes provided with a mixture of dwelling types and sizes, responding to local need and the character of the area;
- Residential development parcels are sub-divided by green corridor areas and tree-lined streets;
- Design proposals to consider principles of Building for a Healthy Life and Secured by Design.





Illustrative Masterplan

Key

- | | | | |
|--|---------------------------------|--|-------------------------------|
| | Site Boundary | | SUDs features |
| | Local Authority Boundary | | Vehicular & Pedestrian Access |
| | Residential Development Parcels | | Pedestrian Access only |
| | Footpath/cycle routes | | Trim Trail |
| | Wildflower Meadow | | Landscape Buffer |
| | Possible Pedestrian Links | | |



Planning Appraisal

Following the review of the Green Belt and Gravesham Borough Council's Regulation 18 Local Plan, the context of the site at Chapter Views is significantly changing. The release of the Green Belt land surrounding the site, and its visual and physical separation from neighbouring settlements would mean that development of this site will not substantially affect the wider Green Belt, nor the purpose of including land within it.

It is clear from scrutiny of the sites allocated in the Medway Regulation 18 Local Plan, that the Council is going to need to release some Green Belt land to meet their housing requirements, and due to the changing context of the site, the sustainability credentials of the site, and the ability for the site to deliver housing early in the Plan period, there are exceptional circumstances that warrant the Council allocating this site and removing it from the Green Belt.

Regardless of the draft allocation in the Gravesham Local Plan coming forward, this site represents an ideal location as an extension of the built-up area of Strood. It is in a highly sustainable location, with public transport links in easy reach of the site and benefits from the existing services and facilities of Strood.

Development on the site could be delivered within five years and there is no impediment to the delivery of the site. The site is available and suitable for development and there are no known abnormal or infrastructure requirements beyond those expected to deliver a development of this nature, meaning that the proposals are achievable.

Barratt David Wilson expect to be able to meet policy obligations including the delivery of affordable housing as part of a conventional housing development on a greenfield site and deliver 10% biodiversity net gain.





A New Community

Chapter Views sits at the heart of a number of sites that are being proposed for development in both local authorities. The site to the north and west of the site, is included within Gravesham Borough Council's Regulations 18 (Stage 2) consultation in 2020 as a draft allocation, whilst the sites to the east are currently being independently promoted as part of Medway Council's Call for Sites.

Chapter Views creates an opportunity for a stand-alone residential development, but also could form part of an opportunity to create a new highly sustainable extension to the north of Strood. Creating an opportunity to improve permeability - allowing new and existing residents to share facilities – creating a new landscape led community.



Summary

Chapter Views is a valuable opportunity to create a highly sustainable new residential development, reflecting the local architectural vernacular and landscape character.

Key benefits of the proposals would include:

- Circa 350 No. energy efficient new homes;
- A mix of tenures and sizes, including affordable housing;
- Over 4.5 hectares of green space on site for residents to enjoy;
- Play areas – providing opportunities for formal and informal play;
- Improved pedestrian and cycle connectivity, including a trim trail;
- New meadow and wetland habitats created, existing tree/hedgerows enhanced;
- Opportunities for at least 10% BNG (biodiversity net gain) to be delivered on site;
- Sustainable urban drainage solutions (SUDs) – infiltration basins, swales and wildlife ponds – adding to the biodiverse habitats on site and residents enjoyment;
- Integration within the existing community, improving connectivity in the area and sharing access to green spaces and amenities.
- Potential to form part of a wider community to the north of Strood by working with the adjoining landowners.



