



# **Land at Broomhill Rise Strood, Medway**

## Green Belt Review

## CONTENTS

1.0	INTRODUCTION.....	1
2.0	LANDSCAPE CONTEXT.....	2
3.0	VISUAL CONTEXT .....	4
4.0	MEDWAY GREEN BELT REVIEW .....	6
5.0	SCARP ASSESSMENT OF SITE CONTRIBUTION TO GREEN BELT PURPOSES	9
6.0	INDICATIVE DEVELOPMENT PROPOSAL .....	20
7.0	EFFECTS OF DEVELOPMENT ON GREEN BELT PURPOSES .....	22
8.0	SUMMARY AND CONCLUSIONS.....	25

## FIGURES

Figure 1: Site Location

Figure 2: Green Belt and Landscape Planning Designations

Figure 3: Landform and Topography

Figure 4: Local Landscape Aerial Photograph

Figure 5: Site Landscape Aerial Photograph

## APPENDICES

Appendix A: Site Appraisal and Site Context Photographs

Appendix B: Medway Green Belt Review Findings for Land Parcels 1 and 2

Appendix C: Indicative Master Plan

Appendix D: Medway Green Belt Review Appendix B (Environmental designations)

Approved                      Stephen Kirkpatrick)



Position                      Director

Date                              06-09-2024

## 1.0 INTRODUCTION

1.1.1 Bellway Strategic Land proposes to develop land for housing on the northern edge of Strood in Medway District. This land is hereafter referred to as “the Site” (**Figure 1: Site Location**), is located in the Metropolitan Green Belt and forms part of Land Parcel 2, as identified in the Medway Green Belt Review<sup>1</sup> (**Figure 2: Green Belt and Landscape Planning Designations**).

1.1.2 This Green Belt Review report has been prepared by Scarp Landscape Architecture on behalf of Bellway Strategic Land. It (1) identifies the landscape and visual context of the site, (2) appraises the degree to which the site contributes to the purposes of the Green Belt, and (3) appraises the effect of developing the site for housing on these Green Belt purposes.

1.1.3 In considering the extent to which the site contributes to the purposes of the Green Belt, master planning considerations are presented to illustrate how development could respond positively to the landscape and to the benefit the wider Green Belt.

1.1.4 This report is set out under the following headings:

- (1) Introduction
- (2) Landscape Context
- (3) Visual Context
- (4) Medway Council Green Belt Review
- (5) Scarp Assessment of Site Contribution to Green Belt Purposes
- (6) Indicative Development Proposal
- (7) Effects of the Development on Green Belt Purposes
- (8) Summary and Conclusions

---

<sup>1</sup> Medway Green Belt Review, Medway Council (December 2018)

## 2.0 LANDSCAPE CONTEXT

- 2.1.1 Strood forms part of an extensive built up area on the northern side of the River Medway. A swathe of farmland and scattered villages lies to the north of the town. These villages include the large village of Higham and the smaller villages of Lower Higham, Shorne and Shorne Ridgeway. A cluster of housing also abuts the eastern edge of Gravesend Road where it is accessed off Dillywood Lane. The A289 defines the northern boundary of the town in the vicinity of Wainscott but veers away from the town on its approach to the M2 (**Figure 1: Site Location**).
- 2.1.2 Strood extends up from the River Medway onto a broad southwest to northeast orientated hillspur. Broom Hill (85m AOD) is a local high point on this hillspur and is readily identifiable as a block of woodland within the built up area. The eastern portion of Land Parcel 2 forms part of a U-shaped landform with land rising up south-eastwards to the urban edge and on to Broom Hill, south-westwards towards a ridge that is aligned with Gravesend Road and north-westwards towards a secondary hillspur that is broadly aligned with Dillywood Lane and includes high points of 75m AOD near Gravesend Road and 70m AOD at the lower end of the Dillywood Lane housing area (**Figure 3: Local Landform and Topography**). The land descends relatively steeply on the north-western side of this secondary hillspur to form a shallow valley that is occupied by the A289. It then climbs up again to join Telegraph Hill and Gadshill on the eastern and southern edges of Higham. Levels also descend north-eastwards from the Gravesend Road ridge to approximately 40m AOD near the eastern site boundary. The western part of Land Parcel 2 gently rises up to the northwest where a minor ridge is aligned with its northern boundary. North of this ridge, the land falls to the A289 shallow valley before climbing up again to meet Telegraph Hill and Gadshill. West of this ridge, the land continues to rise up to meet a local high point of 75m AOD near Three Crutches.
- 2.1.3 The pattern of agricultural fields, orchards, woodlands, tree belts and hedgerows in the rural landscape to the north and northwest of Strood is illustrated on **Figure 4: Local Landscape Aerial Photograph** and **Figure 5: Site Landscape Aerial Photograph**. Field sizes and shapes vary considerably, with larger scale fields located between the A289 and Strood. Tree/shrub belts line the A289 and sections of Gravesend Road. Tree shelter belts define some field boundaries and also line some local roads and lanes. Great Crabbies Wood lies southwest of Higham and relatively small blocks of woodland lie at Broom Hill, Telegraph Hill and Gadshill (**Figure 1: Site Location**).



- 2.1.4 A network of public rights of way (PRoW) crosses the local landscape as identified on **Figure 1: Site Location**. There are relatively few PRoW on the southern side of the A289 compared to the northern side of the road. To the south, two public footpaths pass through Land Parcel 2: one connecting Brompton Farm Road with Dillywood Lane and another connecting Brompton Farm Road with Gravesend Road. To the north, a network of PRoW extends out from Higham and connect local roads.
- 2.1.5 The Dillywood Lane Area of Local Landscape Importance (ALLI) extends from the north-western edge of Strood to the borough boundary (**Figure 1: Site Location**). Page 93 of the adopted Local Plan describes this locally designated landscape as *“a gently undulating, visually diverse area of orchards and mixed farmland”* and identifies its function as:
- Creates an attractive, rural setting to the Medway Towns Northern Relief Road, contributing to the positive image of the borough.
  - Connects to the South East of Higham Upshire ALLI in Gravesham.
  - Constitutes an established rural landscape in close proximity to a large urban area.
  - Helps to maintain separate identity of Higham.

### 3.0 VISUAL CONTEXT

- 3.1.1 The visual context of Land Parcel 2 is described below with reference to a set of illustrative site appraisal and site context photographs (**Appendix A**). Viewpoint locations are identified on the plan at the front of this appendix. These photographs were all taken in December 2022.
- 3.1.2 East of Gravesend Road, open views of the orchards and arable fields within Land Parcel 2 may be obtained from the two public footpaths that cross the land. The built up edges of Strood and existing housing along Dillywood Lane are clearly visible in views from within the land parcel (**Photographs 5, 6, 8 and 20**). Much of this housing has a visually harsh appearance. The rural landscape on the northern and north-eastern sides of Strood also forms part of the visual context for the land. Housing along the built up edges of Strood and along Dillywood Lane form part of the views available from this rural landscape to the north (**Photographs 13, 14 and 15**).
- 3.1.3 Views in and out of lower parts of the land parcel are enclosed by robust tree belts that line both sides of the A289 (**Photographs 2, 13 and 14**). Vegetation and embankments line both sides of Gravesend Road thereby enclosing views of the land parcel both east and west of the road (**Photograph 9**). Rural lanes that pass through or alongside the land parcel are lined by mature tree/shrub vegetation and have a well-treed character (**Photographs 1, 10 and 11**).
- 3.1.4 A glimpsed view Land Parcel 2 east of Gravesend Road may be obtained in elevated views from both the northeast and northwest. From the northeast, the fields east of Gravesend Road may be seen against a backdrop of housing at Brompton Farm Road, Strodes Close and Gravesend Road but views of most of the fields are filtered by the A289 tree belts (**Photograph 14**). From the northwest, views of the fields are partially enclosed by off-site housing along Dillywood Lane. Where visible, the fields within east of Gravesend Road may be seen against a backdrop of housing at Brompton Farm Road and are filtered by mature trees along Dillywood Lane. The relatively steep slopes associated with land on the northern side of the lane are relatively prominent compared to the slopes in the land parcel upslope (**Photograph 15**).
- 3.1.5 The minor ridge along the northern boundary of Land Parcel 2 west of Gravesend Road encloses views of most of this land and its visibility in elevated views from the northwest is largely restricted to a line of mature trees along the ridge (**Photograph 17**). From lower-lying

areas to the west, views of Land Parcel 2 are completely enclosed by intervening relatively high landform (**Photograph 18**).

## 4.0 MEDWAY GREEN BELT REVIEW

4.1.1 The key objectives of the Medway Green Belt Review<sup>2</sup> were to assess whether Medway's Green Belt, as currently defined:

- accords with the fundamental aim of Green Belt policy which is to keep land permanently open;
- fulfils the five purposes of Green Belt policy as set out within the NPPF;

4.1.2 Page 4 of the Green Belt Review states that *"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."*

4.1.3 Green Belt land within Medway was sub-divided into five separate land parcels for the purpose of the review (**Plate 1**). Land Parcels 1 and 2 lie on the north-western side of Strood and extend to the district boundary. The review findings for these land parcels are provided in **Appendix B**.

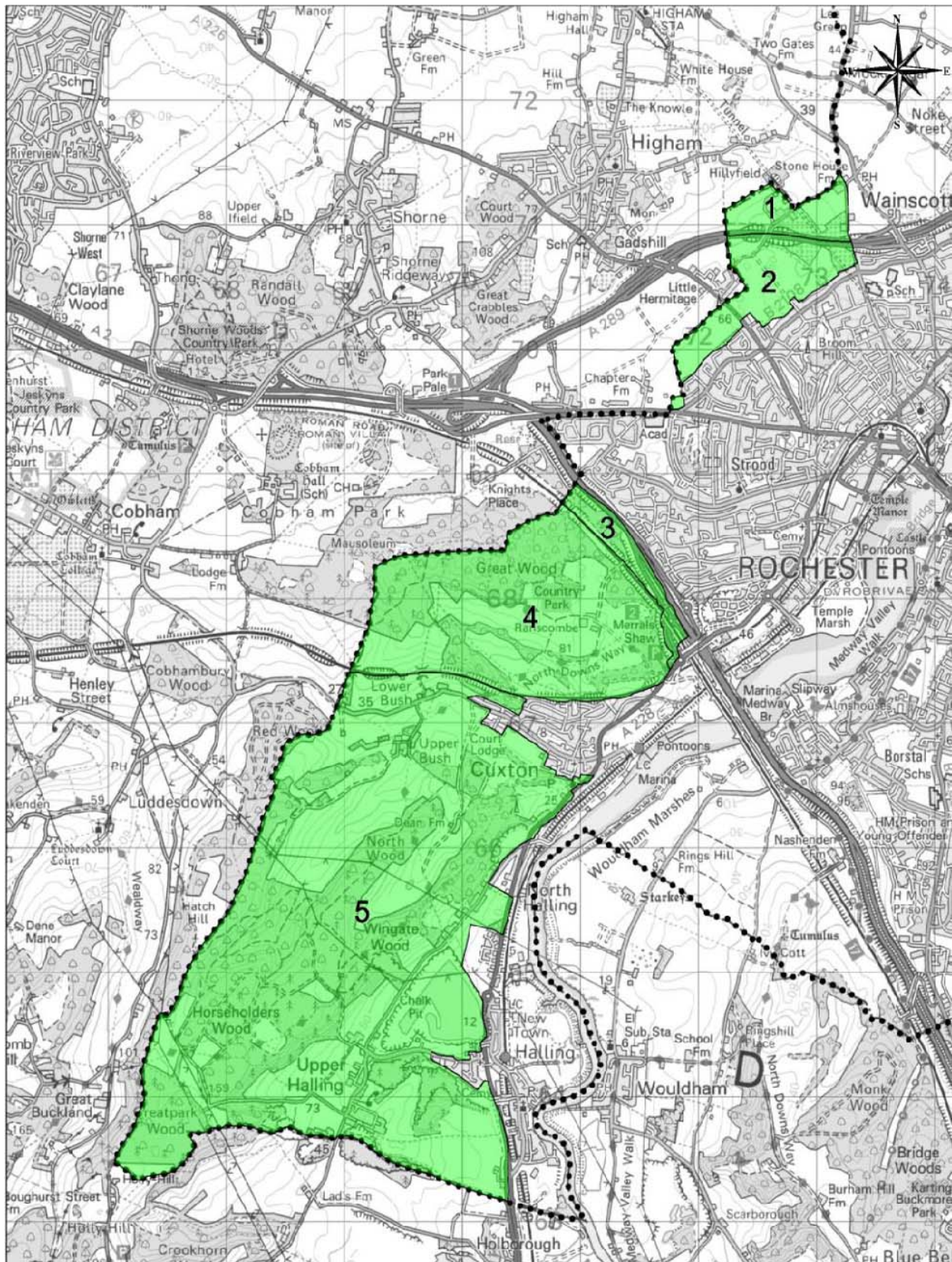
3.1.4 The review provided the following description of Land Parcel 2:

*"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."*

---

<sup>2</sup> Medway Green Belt Review, Medway Council (December 2018)





**Plate 1: Medway Green Belt Land Parcels**

4.1.4 The review correctly identifies that the area of polytunnels to the south of Dillywood Lane is more enclosed but does not identify the degree to which other part of the land parcel east of Gravesend Road are enclosed by local landform and vegetation. The review does not mention existing housing at Dillywood Lane, both within the land parcel and along its northern boundary. It also does not mention how the A289 serves to robustly define the northern edge of this land parcel. The review correctly identifies that the land west of Gravesend Road is *“distinctly part of the wider green belt farmland extending towards the A289 and beyond”* but omits to mention the weaker relationship between land east of Gravesend Road and the wider green belt farmland that results from the enclosure provided by landform, buildings and vegetation.

4.1.5 Section 5.3 of the review provided the following assessment the purpose and aims of Green Belt.

Land Parcel	Description	Purpose 1	Purpose 2	Purpose 3	Aims	Summary
2	Land north of Brompton Farm Road and south of A289. Extends to district boundary - west	High	Medium	High	High	High

4.1.6 The review identified that Land Parcel 2 provides an overall high contribution to the purpose and aims of Green Belt but did not provide any transparent justification for this assessment. It recommended no change to the Green Belt for this land parcel without this supporting evidence.

## 5.0 SCARP ASSESSMENT OF SITE CONTRIBUTION TO GREEN BELT PURPOSES

### 5.1 Introduction

5.1.1 As noted in Paragraph 137 of the National Planning Policy Framework<sup>3</sup> (NPPF), the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and the essential characteristics of Green Belts are their openness and their permanence.

5.1.2 Paragraph 138 of the NPPF states that the Green Belt serves five purposes:

- 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.

5.1.3 It should be noted that the proposed reforms to the NPPF, as set out in the Government's Consultation Draft published on 30 July 2024, include reference to 'grey belt' land and state at Paragraph 144 that *"Where 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."* The glossary in NPPF Annex 2 defines 'grey belt' 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)".* Footnote 7 relates to *"habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an 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 74); and areas at risk of flooding or coastal change"*.

---

<sup>3</sup> National Planning Policy Framework (Ministry of Housing, Communities and Local Government, July 2021)



- 5.1.4 The site occupies a high proportion of Land Parcel 2 on the eastern side of Gravesend Road. The contribution of the site to Green Belt purposes is appraised below, using the following five point scale to draw out clear variations in the contribution to each Green Belt purpose:

Level of Contribution	Rating
<b>Strong Contribution</b>	Green Belt performs well against the purpose.
<b>Relatively Strong Contribution</b>	Green Belt performs relatively well against the purpose.
<b>Limited Contribution</b>	Green Belt performs moderately well against the purpose.
<b>Relatively Weak Contribution</b>	Green Belt performs relatively weakly against the purpose.
<b>Weak/No Contribution</b>	Green Belt makes a weak or no contribution to the purpose.

## 5.2 Contribution to Purpose 1: ‘to check the unrestricted sprawl of large built up areas’

- 5.2.1 Sprawl may be defined as the ‘spreading out of built form over a large area in an untidy or irregular way’ (Oxford English Dictionary). 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. However, it is important to define any variations in the degree to which land performs this purpose.

- 5.2.2 Issues for consideration in any appraisal of the site contribution to Purpose 1 include:

- Does the land lie in adjacent to, or in close proximity to the large built up area?
- To what extent is the land open or does it contain existing urban development?
- Does the land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
- Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, for development to be regarded more as infill than sprawl? What is the degree of containment by existing built development or other features (e.g. landform)?



5.2.3 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred and its relationship with the existing large built-up area. To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development or the strength of physical separation from the wider countryside, will make a weaker contribution to this purpose. Urban fringe land uses and the influence of adjacent urban areas, whilst they may reduce the extent to which land is considered to be part of the countryside, do not diminish the extent to which expansion of a large built up area would be considered sprawl – i.e. this is a key difference between Purpose 1 and Purpose 3.

5.2.4 The following criteria have been used for the assessment of Purpose 1:

Assessment Criteria for Purpose 1: Check the unrestricted sprawl of large built up areas	
<b>Strong Contribution</b>	Land adjacent or close to the large built-up area that contains no or very low levels of urban development and has a strong sense of openness. It relates strongly to the wider countryside as opposed to the urban area.
<b>Relatively Strong Contribution</b>	Land adjacent or close to the large built-up area that contains very low levels of urban development and has a strong sense of openness. It relates more strongly to the wider countryside.
<b>Limited Contribution</b>	Land adjacent or close to the large built-up that contains low levels of limited urban development and has a relatively strong sense of openness. It may relate to both the settlement and the wider countryside or have a degree of separation from both.
<b>Relatively Weak Contribution</b>	Land adjacent or close to the large built-up area that already contains urban sprawl compromising the sense of openness, or it relates more strongly to the urban area than to the wider countryside.
<b>Weak/No Contribution</b>	Land adjacent or close to the large built-up area that is already fully urbanised; or land that is sufficiently separated or distant from a large built-up area for there to be any significant potential for urban sprawl from the large built up area.

5.2.5 The Site lies adjacent to the large built-up area of Strood. It includes a component of previously developed land in the form of Dillywood Cottages and sections of tarmacadamised

road that extend along the northern site boundary (**Photograph 3**) and northwards from Strodes Close (**Photograph 7**).

5.2.6 The Site relates physically and visually to the settlement as it is enclosed by housing on three sides (**Photographs 5 and 6**) and has a strong relationship with the built-up area. However, it also relates physically and visually to the wider countryside (**Photograph 7**). The Dillywood Lane housing area and the spur of elevated land on the north-western side of the site provides a strong sense of separation from this wider countryside for the upper parts of the site (**Photographs 7, 8 and 20**). The A289 tree belts provide a strong sense of separation from the wider countryside for the lower parts of the site (**Photograph 2**).

5.2.7 The site is connected to the built up area along the south-western boundary (housing along Brompton Farm Road), part of the south-eastern boundary (housing along Gravesend Road) and parts of the north-western boundary (housing along Dillywood Lane), with some resultant reduction in the potential for sprawl. The site is enclosed by Gravesend Road to the southwest, by Dillywood Lane to the northwest and by the A289 to the north. It has a relatively strong sense of openness in spite of these roads and surrounding built form. Any new built development on the Site would be contained by these well-defined, physically robust features and would not result in sprawl in the sense of spreading out in ‘an untidy or irregular way’. The outer edge of any expanded built-up area would be contained by the A289 in a similar manner to the housing areas east of Stonehorse Lane.

5.2.8 The inner boundary of the land parcel is not a defensible and durable boundary and is not effective in preventing the outward, irregular spread of the built up area.

5.2.9 The site provides a Limited contribution to Purpose 1 on the basis of the above.

### **5.3 Contribution to Purpose 2: ‘to prevent neighbouring towns merging into one another’**

5.3.1 The extensive area of land between the settlements of Gravesend and Strood forms part of the Green Belt. It includes the relatively small settlements of Higham, Three Crutches and Shorne, which are inset from the Green Belt.

5.3.2 Issues for consideration in any appraisal of the site contribution to Purpose 2 include:

- Does the land lie directly between two settlements being considered under Purpose 2?
- How far apart are the towns being considered?
- Is there strong intervisibility between the towns?
- How do the gaps between smaller settlements affect the perceived gaps between towns?
- Are there any separating features between the towns including e.g. hills, woodland blocks etc. which increase the sense of separation between the settlements?
- Are there any connecting features between the towns including e.g. roads, railways which reduce the sense of separation between the settlements?
- What is the overall fragility/ robustness of the gap taking the above into account?

5.3.3 The following criteria have been used for the assessment of Purpose 2:

Assessment Criteria for Purpose 2: Prevent neighbouring towns from merging	
<b>Strong Contribution</b>	Land that plays a highly significant role in inhibiting physical or visual coalescence of towns, such as narrow gaps that are visually open with few separating features.
<b>Relatively Strong Contribution</b>	Land that plays a significant role in inhibiting physical or visual coalescence of towns, such as narrow gaps with some separating features or wider visually open gaps with few separating features.
<b>Limited Contribution</b>	Land that plays a role in inhibiting physical or visual coalescence of towns, but which is also bordered by separating features which prevent visual or physical coalescence of towns.
<b>Relatively Weak Contribution</b>	Land that plays a limited role in inhibiting physical or visual coalescence of towns due to relatively significant separating features which prevent visual or physical coalescence of towns or wider gaps between towns, or a combination of the two.
<b>Weak/No Contribution</b>	Land which is not located within a gap between towns, or plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns.

5.3.4 The gap between Gravesend and Strood is approximately 5km wide at its narrowest point. The contribution to the purpose of preventing neighbouring towns from merging into one another is diminished by the presence of substantial blocks of woodland around the relatively small settlements of Higham and Shorne. These woodland blocks would compensate for a narrower gap in terms of distance. The Site provides only a very limited role in inhibiting physical or visual coalescence between Gravesend and Strood as this is effectively achieved by the effects of distance and the enclosure provided by intervening landform, buildings, woodland and other mature off-site vegetation.

5.3.5 There is no inter-visibility between the Site and Gravesham due to the enclosure provided by intervening landform. There is no inter-visibility and a strong sense of separation between this area and the inset settlements of Higham, Shorne and Shorne Ridgeway due to the enclosure provided by intervening woodland and/or landform. This sense of separation is also experienced from a short section of Hermitage Road on the eastern side of Higham (**Photograph 15**) and from short sections of public rights of way that descend from the Hermitage Road ridge. Views from most sections of these routes are not available due to the enclosure provided by intervening vegetation or buildings. Where visible, the site is restricted to some glimpsed views to the rear of the Dillywood Lane tree belt. The area plays only a limited role in inhibiting physical or visual coalescence of Strood and Higham due to relatively significant separating features which prevent visual or physical coalescence.

5.3.6 The Site provides a Relatively Weak contribution to Purpose 2 on the basis of the above.

#### **5.4 Contribution to Purpose 3: ‘to assist in safeguarding the countryside from encroachment’**

5.4.1 This purpose of the Green Belt is to ensure that built development does not gradually advance into countryside beyond its existing limits, reducing the open characteristic of the Green Belt.

5.4.2 In order to effectively assess the contribution of the site to this purpose, it is important to determine the extent to which Green Belt land:

- Contains, or is influenced by urbanising land uses and features.
- Relates to adjacent settlements and to the wider countryside.

5.4.3 Urbanising land uses and features are considered to include any features that diminish openness or compromise the rural character of the countryside. Physical landscape elements (or a lack of them), may strengthen or weaken the relationship between a settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical landscape containment to limit contribution to this purpose. The presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may give land a strong relationship with a visible urban area even if buildings are not particularly dominant.



5.4.4 Issues for consideration in any appraisal of the site contribution to Purpose 3 include:

- To what extent does the land exhibit the characteristics of the countryside – i.e. an absence of built or otherwise urban development?
- Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?
- Does land relate more strongly to the settlement(s), or to the wider countryside?

5.4.5 The following criteria have been used for the assessment of Purpose 3:

Assessment Criteria for Purpose 3: Safeguarding the countryside from encroachment	
<b>Strong Contribution</b>	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms <sup>4</sup> ) and which does not have a relationship with the urban area.
<b>Relatively Strong Contribution</b>	Land that contains the characteristics of open countryside (i.e. a general absence of built or otherwise urbanising uses in Green Belt terms) and which does not have a stronger relationship with the urban area than with the wider countryside.
<b>Limited Contribution</b>	Land that contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms) and which has either a stronger relationship with the urban area than with the wider countryside (i.e. it is contained in some way by urbanising and or other features) or an equally strong relationship with the urban area as the wider countryside; or Land which retains some degree of openness but which is compromised by urbanising development or uses within it.
<b>Relatively Weak Contribution</b>	Land that has very limited characteristics of open countryside and is influenced by urbanising development of a scale, density or form which compromises openness to a notable degree.
<b>Weak/No Contribution</b>	Land that does not contain the characteristics of open countryside and is influenced by urbanising development of a scale, density or form which significantly compromises openness.

5.4.6 Any urban extension may be considered as an ‘encroachment’ into the Green Belt but this is where the potential ability of the landscape to accommodate change fulfils an important role. In this case, the Site has a good capacity to accommodate new housing in landscape terms provided that the form of new development is closely related to, and in scale with, the existing settlement adjacent to the site. This capacity is provided by (1) the rising landform and off-site housing to the west/northwest, by mature trees along Dillywood Lane and by the A289 tree

<sup>4</sup> This does not include development that is deemed to be appropriate, or not inappropriate within the Green Belt as set out in Paragraphs 145 and 146 of the NPPF.

belts, (2) the strong relationship of the site with existing housing along the south-eastern, south-western site and north-western site boundaries and (3) its location alongside highways to the southwest, northwest, southeast and north.

5.4.7 The site has the characteristics of open countryside (i.e. a general absence of built form) but contains a component of previously developed land (Dillywood Cottages and existing roads) and importantly abuts existing housing along the upper sections of Dillywood Lane. This housing lies within the Gravesham Green Belt and compromises the open characteristics of the site. The concentration of highways (Gravesend Road to the southwest, Dillywood Lane to the northwest, Brompton Farm Road to the southeast and by the A289 to the north) also imparts a degree of urban fringe character.

5.4.8 The site has a strong relationship with the urban area, which abuts the south-eastern site boundary and part of the south-western site boundary. It has a weak relationship with the wider countryside in the upper western and lower eastern parts of the site but a stronger relationship with the wider countryside in other parts. The rising landform and off-site housing to the west/northwest, mature trees along Dillywood Lane and the A289 tree belts along the northern site boundary provide for visual containment and contribute to this weak relationship with the wider countryside.

5.4.9 The site is not perceived as forming part of the prominent agricultural landscape associated with the relatively steep land descending from Dillywood Lane and its associated housing and, as such, makes a less important contribution to safeguarding the countryside from urban encroachment.

5.4.10 The site provides a Limited contribution to Purpose 3 on the basis of the above.

## **5.5 Contribution to Purpose 4: 'Preserving the Setting and Special Character of Historic Towns'**

5.5.1 Issues for consideration in any appraisal of the site contribution to Purpose 3 include:

- What is the relationship of the land with the historic town?
- Does the land form part of the setting and/or special character of a historic town?

- What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?

5.5.2 The following criteria have been used for the assessment of Purpose 4:

Assessment Criteria for Purpose 4: Setting and Special Character of Historic Towns	
<b>Strong Contribution</b>	The land and its openness makes a key contribution to the characteristics identified as contributing to a historic town's special character or setting.
<b>Relatively Strong Contribution</b>	The land and its openness makes a significant contribution to the characteristics identified as contributing to a historic town's special character or setting.
<b>Limited Contribution</b>	The land and its openness makes a contribution to the characteristics identified as contributing to a historic town's special character or setting.
<b>Relatively Weak Contribution</b>	The land and its openness makes a minor contribution to the characteristics identified as contributing to a historic town's special character or setting.
<b>Weak/No Contribution</b>	Land forms little or no part of the setting of a historic town and does not contribute to its special character.

5.5.3 The Site does not abut a historic town, nor form part of the setting or special character of a historic town.

5.5.4 At a more local level, there is no inter-visibility between the site and any conservation areas in neighbouring Gravesend District (Higham Church Street, Lower Higham, Shorne and Shorne Ridgeway) due to the enclosure provided by intervening landform and woodland. The Site provides no contribution to Purpose 4 on this basis.

## 5.6 Contribution to Purpose 5: 'assist in urban regeneration by encouraging the recycling of derelict and other urban land'

5.6.1 The site does not perform a role in this purpose.

## 5.7 Potential effects on adjacent Green Belt land

5.7.1 Any appraisal of the overall harm arising from the removal of land from the Green Belt must also review the potential effect of this removal on adjacent Green Belt land.

5.7.2 It is important to consider whether or not a revised Green Belt boundary would result in a less distinct boundary between the settlement and the countryside, with a resultant weakening of

the contribution that remaining Green Belt land makes to the Green Belt purposes. In this case, release of the site from the Green Belt would deliver a relatively distinct and robust Green Belt boundary in the form of the well-treed A289 road corridor. Use of this strong landscape feature as a Green Belt boundary would be consistent with its use east of Stonehorse Lane / along the northern edge of Wainscott.

5.7.3 It is also important to consider the strength of the adjacent Green Belt land in relation to Green Belt purposes. In this case, release of the site (with its degree of containment from the wider countryside provided by landform, built form and tree belts) would only minimally increase the degree of containment of Green Belt land north of Dillywood Lane and the A289, which plays a more significant role in relation to Green Belt purposes than the site. Green Belt land north of Dillywood Lane and the A289 would also provide a strong contribution to the sense of visual separation between an expanded Strood and the settlements of Higham and Gravesend.

5.7.4 Removal of the site from the Green Belt would have an overall minimal effect on the adjacent Green Belt land north of Dillywood Lane and the A289.

## 5.8 Overall Harm to the Green Belt Purposes

5.8.1 The overall harm to the Green Belt purposes is dependent on both the loss of the contribution provided to the Green Belt purposes (Sections 5.2 to 5.6 above) and the potential effects on the adjacent Green Belt (Section 5.7). The level of overall harm Green Belt purposes has been assessed on the basis of the following criteria:

Harm to the Green Belt Purposes	
<b>High harm</b>	Release of land that makes a significant contribution to at least one of the Green Belt purposes, and would constitute at least a minor weakening of the integrity of land that remains designated as Green Belt.
<b>Limited-high harm</b>	Release of land from the Green Belt that makes a relatively significant contribution to one of the Green Belt purposes and a less significant contribution to others, and would cause a minor weakening of the integrity of land that remains designated as Green Belt.
<b>Limited harm</b>	Release of land from the Green Belt that makes a Limited contribution to one of the Green Belt purposes and a less significant contribution to others, and would cause a minor weakening of the integrity of land that remains designated as Green Belt.



Harm to the Green Belt Purposes	
<b>Low-Limited harm</b>	Release of land from the Green Belt makes a relatively limited contribution to one of the Green Belt purposes and a limited contribution to others, and would cause a minor weakening of the integrity of land that remains designated as Green Belt.
<b>Low harm</b>	Release of land from the Green Belt that makes limited or no contribution to all of the Green Belt purposes, and would cause no more than a minor weakening of the integrity of land that remains designated as Green Belt.

- 5.8.2 As identified in Sections 5.2. to 5.6 above, the Site makes only a Relatively Weak contribution to Green Belt Purpose 2 and a Limited contribution to Purposes 1 and 3. It makes no contribution to Purposes 4 and 5.
- 5.8.3 The release of the site from the Green Belt would result in an overall limited level of harm to the Green Belt based on its contribution to Green Belt purposes and the identified minimal effect on the adjacent Green Belt land north of Dillywood Lane and the A289.

## **6.0 INDICATIVE DEVELOPMENT PROPOSAL**

### **6.1 Indicative Master Plan**

- 6.1.1 The proposed distribution of housing and greenspace on the site is illustrated by the Indicative Master Plan in **Appendix C**. This provides a sensitive response to landscape context of the site.
- 6.1.2 The proposed housing would abut the existing urban edges along the south-eastern and south-western site boundaries. A wide belt of new publicly accessible green infrastructure (GI) would be provided within the north-western and northern parts of the site thereby conserving the rural setting of Dillywood Lane and the open rural character of land on the northern side of the lane. The set back of housing from Dillywood Lane and the provision of well-treed peripheral GI, including new woodland, would more effectively integrate the enlarged settlement into the surrounding rural landscape than the existing settlement with its visually harsh edges.
- 6.1.3 Intermittent greenspaces and ‘green fingers’ would permeate through the neighbourhood and would provide the vegetation framework for housing clusters and create a visual mosaic of buildings and trees for landscape and visual integration.
- 6.1.4 Space would be provided for provision of well-treed, characterful streets.
- 6.1.5 The proposed GI belts and corridors would have landscape, recreational, ecological and climate change mitigation benefits. They would provide space for formal recreation, routes for walkers/cyclists, children’s play and food growing, with resultant enhanced health opportunities / recreational usage of land on the northern side of the town for both existing and future residents. Existing public rights of way would be retained within GI corridors. The housing area would be well connected with both the existing urban area (three connections onto Brompton Farm Road and two onto Gravesend Road) and the surrounding rural landscape (with new connections onto Dillywood Lane). The GI framework would also incorporate additional habitat resources for wildlife (wildflower meadow, hibernacula etc) and would retain and/or enhance existing features of nature conservation value within the site (trees, hedgerows, ditches etc).

- 6.1.6 The site would deliver in excess of 17ha of publicly accessible GI (Plate X: Green Infrastructure Provision) for existing and future residents, thereby addressing an existing deficiency for open space in Strood North ward and significantly exceeding Natural England's target for natural greenspace provision of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home.

## **7.0 EFFECTS OF DEVELOPMENT ON GREEN BELT PURPOSES**

### **7.1 Introduction**

- 7.1.1 This section of the report appraises the potential harm that would arise to the Green Belt as a result of the proposed development, as illustrated by the Indicative Master Plan. It is envisaged that the proposed housing would be of similar height, scale and massing as the surrounding built form.

### **7.2 Effects on Green Belt purposes**

- 7.2.1 The level of harm that may arise from the release and development of Green Belt land will vary on a site to site basis. In this case, the site abuts the south-eastern and south-western edges of the settlement and would consequently result in relatively low levels of harm compared to Land Parcel 1 that is located further away from the settlement edge on the northern side of the A289. Development of Land Parcel 1 would extend built development into a relatively open area of countryside with boundaries that are less robust than the A289 and with a greater potential to create sprawl with resultant weakening of the integrity of the Green Belt. It would also notably diminish the sense of separation between Strood and Higham.
- 7.2.2 The Indicative Master Plan for land at Broomhill Rise (**Appendix C**) responds to Green Belt sensitivities by setting built form back from Dillywood Lane and by providing a broad belt of greenspace along the northern side of new housing area, including woodland alongside the A289 tree/shrub belt. Any new housing on this land would relate well, both physically and visually, to the existing built up area. The new built form would abut existing housing along the south-eastern and south-western (part) boundaries and would make a positive contribution to settlement form. A Green Belt release would retain a strong sense of separation between this area and Higham (the closest inset settlement) due to the enclosure provided by intervening woodland and/or landform. However, there would be a low level reduction in the sense of separation experienced from short sections of connecting roads or public rights of way. Some filtered views of new housing would be obtained from these short sections of route through the Dillywood Lane tree belt during the winter months upon completion of the new housing but supplementary tree/shrub planting in the broad belt of greenspace along the

northern side of new housing area and within the housing area itself would, upon partial maturity, result in the substantial enclosure of the new built form. The new housing would result in only a very minor increase in the containment of adjacent Green Belt land, which plays a stronger role in checking the unrestricted sprawl of Strood than the land being released.

- 7.2.3 The outer edge of any expanded built-up area would be contained by the A289 in a similar manner to the housing areas east of Stonehorse Lane. New built development would also be contained by Gravesend Road to the southwest, by Dillywood Lane to the northwest and by the A289 to the north. The use of these well-defined, physically robust features would not result in sprawl in the sense of spreading out in ‘an untidy or irregular way’. The current built up area/Green Belt boundary (predominantly defined by rear garden fencing) would be replaced by well-treed roads (A289, Gravesend Road and Dillywood Lane). This is likely to bolster the permanence of the Green Belt and provide a more robust barrier to future encroachment.
- 7.2.4 It is considered that the Development would not result in any material harm to the Green Belt purposes of prevent neighbouring towns merging into one another (Purpose 2), preserving the setting and special character of historic towns (Purpose 4) or assisting in urban regeneration by encouraging the recycling of derelict and other urban land’ (Purpose 5). Whilst the Development would result in some harm to the Green Belt purposes of preventing sprawl of the built-up area and encroachment upon the countryside, this harm would be mitigated by the master planning proposals and associated compensatory improvements to the Green Belt. Paragraph 150 of the NPPF requires 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*”. The Indicative Master Plan demonstrates the potential to create new, publicly-accessible GI. This would incorporate new woodland, allotments, children’s play facilities and formal sports provision, all of which would be available for use by both existing and future residents. The proposed GI also provides the opportunity to deliver enhanced biodiversity, enhanced habitats and enhanced connectivity in the local landscape with new or enhanced walking and cycle routes between Brompton Farm Road and Dillywood Lane and between Gravesend Road and Dillywood Lane.

- 7.2.5 This study has concluded that the release of the site from the Green Belt would result in an overall limited level of harm to the Green Belt based on its limited contribution to Green Belt purposes and minimal effects on the adjacent Green Belt land north of Dillywood Lane and the A289. Development at Broomhill Rise would not reduce the residual adjacent Green Belt to the extent that it would no longer effectively function as Green Belt land.
- 7.2.6 The release of this Green Belt land should be considered in the context of the NPPF Consultation Draft published on 30 July 2024, which states that *“Where 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.”* Grey belt land includes *“areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework)”*. Land at Broomhill Rise is considered to make no more than a limited contribution to the five Green Belt purposes.
- 7.2.7 Development of land at Broomhill Rise would result in the partial loss of this locally designated landscape. However, the greater part of the ALLI, located north of the A289, would be retained. Development of housing on this site would result in only limited harm to the Green Belt and it would avoid the development of Green Belt land in more sensitive areas, such as those within the nationally designated Kent Downs Area of Outstanding Natural Beauty (see **Appendix A**). Development of land at Broomhill Rise would also release pressure for the development of non-Green Belt land sites that are more readily accessible by larger numbers of people, such as Gibraltar Farm, near the Capstone Farm Country Park, Chatham.

## 8.0 SUMMARY AND CONCLUSIONS

- 8.1.1 The Medway Green Belt Review has assessed identified that Land Parcel 2 provides an overall high contribution to the purpose and aims of Green Belt but did not provide any transparent justification for this assessment.
- 8.1.2 Land at Broomhill Rise in the eastern part of Land Parcel 2 has been identified as a potential housing site. This study has identified that this land makes a Relatively Weak contribution to Green Belt Purpose 2 in relation to the separation between Strood and the inset settlements of Higham, Shorne and Shorne Ridgeway and a Limited contribution to Purposes 1 and 3. It makes no contribution to Purposes 4 and 5.
- 8.1.3 The Indicative Master Plan in **Appendix C** responds to Green Belt sensitivities by setting built form back from Dillywood Lane and by providing a broad belt of greenspace along the northern side of new housing area, including woodland alongside the A289 tree/shrub belt. Any new housing on this land would relate well, both physically and visually, to the existing built up area. The new built form would abut existing housing along the south-eastern and south-western (part) boundaries and would make a positive contribution to settlement form. A Green Belt release would retain a strong sense of separation between this area and Higham (the closest inset settlement) due to the enclosure provided by intervening woodland and/or landform. However, there would be a low level reduction in the sense of separation experienced from short sections of connecting roads or public rights of way. Some filtered views of new housing would be obtained from these short sections of route through the Dillywood Lane tree belt during the winter months upon completion of the new housing but supplementary tree/shrub planting in the broad belt of greenspace along the northern side of new housing area and within the housing area itself would, upon partial maturity, result in the substantial enclosure of the new built form. The new housing would result in only a very minor increase in the containment of adjacent Green Belt land, which plays a stronger role in checking the unrestricted sprawl of Strood than the land being released.
- 8.1.4 The outer edge of any expanded built-up area would be contained by the A289 in a similar manner to the housing areas east of Stonehorse Lane. New built development would also be contained by Gravesend Road to the southwest, by Dillywood Lane to the northwest and by the A289 to the north. The use of these well-defined, physically robust features would not result in sprawl in the sense of spreading out in 'an untidy or irregular way'. The current built



up area/Green Belt boundary (predominantly defined by rear garden fencing) would be replaced by well-treed roads (A289, Gravesend Road and Dillywood Lane). This is likely to bolster the permanence of the Green Belt and provide a more robust barrier to future encroachment.

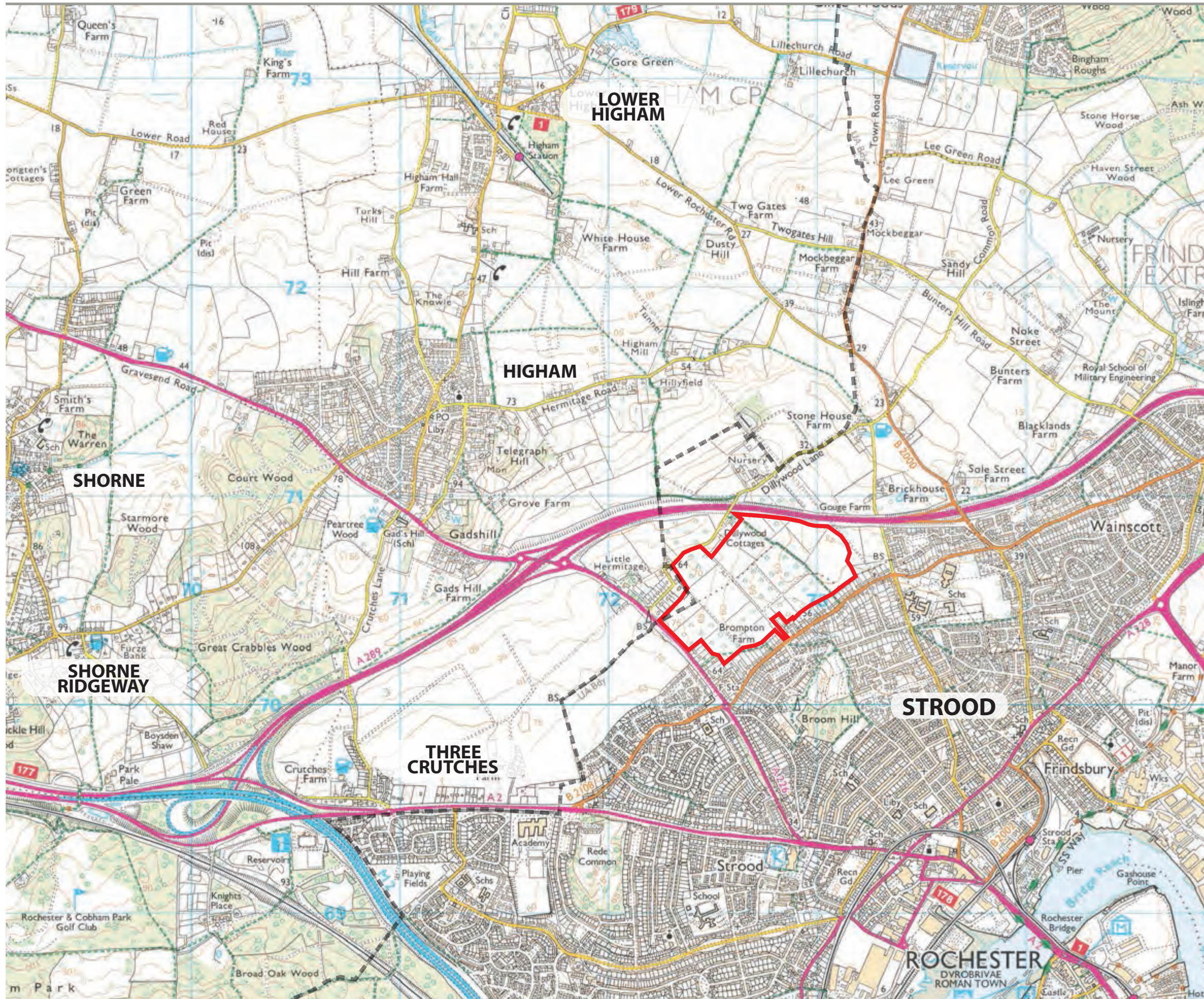
- 8.1.5 It is considered that the Development would not result in any material harm to the Green Belt purposes of prevent neighbouring towns merging into one another (Purpose 2), preserving the setting and special character of historic towns (Purpose 4) or assisting in urban regeneration by encouraging the recycling of derelict and other urban land' (Purpose 5). Whilst the Development would result in some harm to the Green Belt purposes of preventing sprawl of the built-up area and encroachment upon the countryside, this harm would be mitigated by the master planning proposals and associated compensatory improvements to the Green Belt. Paragraph 150 of the NPPF requires 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"*. The Indicative Master Plan demonstrates the potential to create new, publicly-accessible GI. This would incorporate new woodland, allotments, children's play facilities and formal sports provision, all of which would be available for use by both existing and future residents. The proposed GI also provides the opportunity to deliver enhanced biodiversity, enhanced habitats and enhanced connectivity in the local landscape with new or enhanced walking and cycle routes between Brompton Farm Road and Dillywood Lane and between Gravesend Road and Dillywood Lane.
- 8.1.6 This study has concluded that the release of the site from the Green Belt would result in an overall limited level of harm to the Green Belt based on its limited contribution to Green Belt purposes and minimal effects on the adjacent Green Belt land north of Dillywood Lane and the A289. Development at Broomhill Rise would not reduce the residual adjacent Green Belt to the extent that it would no longer effectively function as Green Belt land.
- 8.1.7 The release of this Green Belt land should be considered in the context of the NPPF Consultation Draft published on 30 July 2024, which states that *"Where 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."* Grey belt land includes *"areas of Green Belt land that make a limited*

*contribution to the five Green Belt purposes (as defined in para 140 of this Framework)”. Land at Broomhill Rise is considered to make no more than a limited contribution to the five Green Belt purposes.*

- 8.1.8 Development of land at Broomhill Rise would result in the partial loss of this locally designated landscape. However, the greater part of the ALLI, located north of the A289, would be retained. Development of housing on this site would result in only limited harm to the Green Belt and it would avoid the development of Green Belt land in more sensitive areas, such as those within the nationally designated Kent Downs Area of Outstanding Natural Beauty (see **Appendix A**). Development of land at Broomhill Rise would also release pressure for the development of non-Green Belt land sites that are more readily accessible by larger numbers of people, such as Gibraltar Farm, near the Capstone Farm Country Park, Chatham.






## Figures





# LAND AT STROOD

## Key

-  Potential Housing Development Site
-  Public Footpaths
-  Public Bridleway
-  Restricted byway
-  District Boundary

## Notes

Crown copyright and database rights (2023)  
Ordnance Survey 0100031673

**Scarp** landscape architecture  
environmental planning

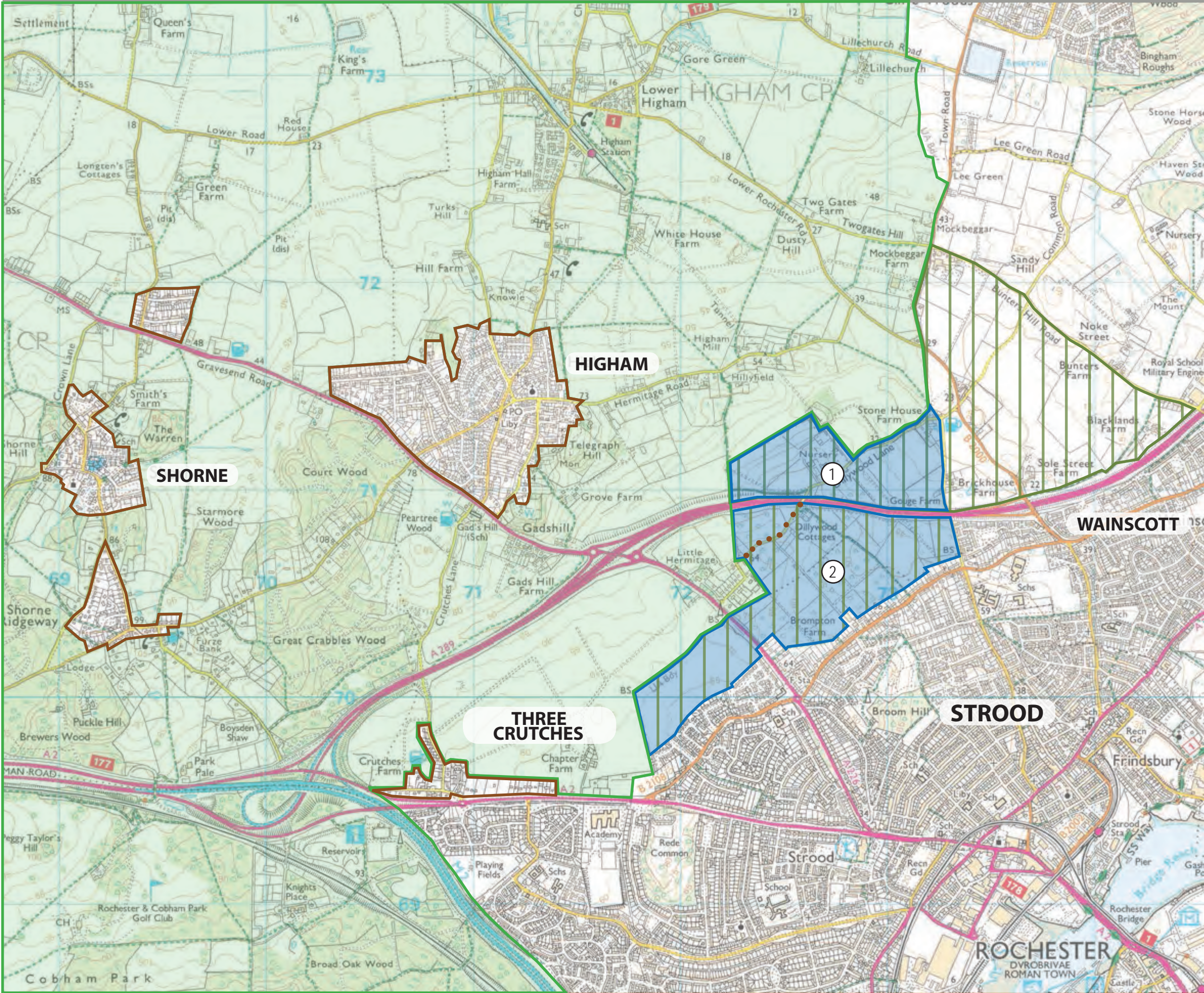
Client  
Bellway Strategic Land

Project  
Land at Strood

Dwg Title  
Figure 1: Site Location

Dwg No  
NTS Jan. 2023





Key

Gravesham Green Belt\*

Rural Settlements inset from Gravesham Green Belt\*

Medway Green Belt (BNE30)\*\*

①

Land Parcel 1 (Medway Green Belt Review)

②

Land Parcel 2 (Medway Green Belt Review)

Area of Local Landscape Importance (BNE34)\*\*

Rural Lanes (BNE47)\*\*

Notes

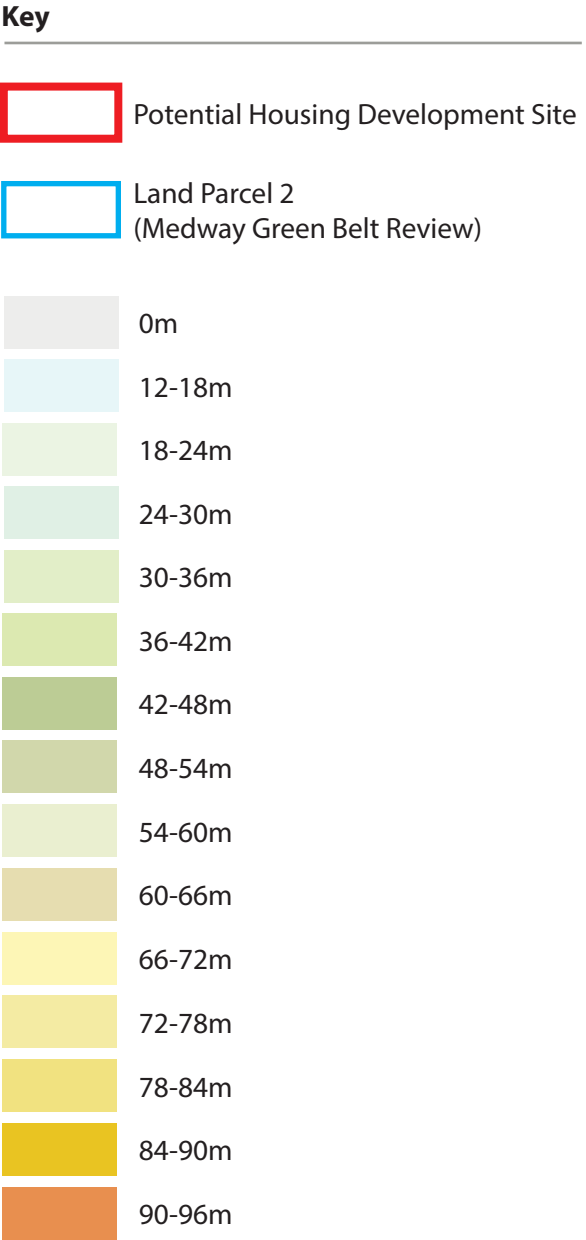
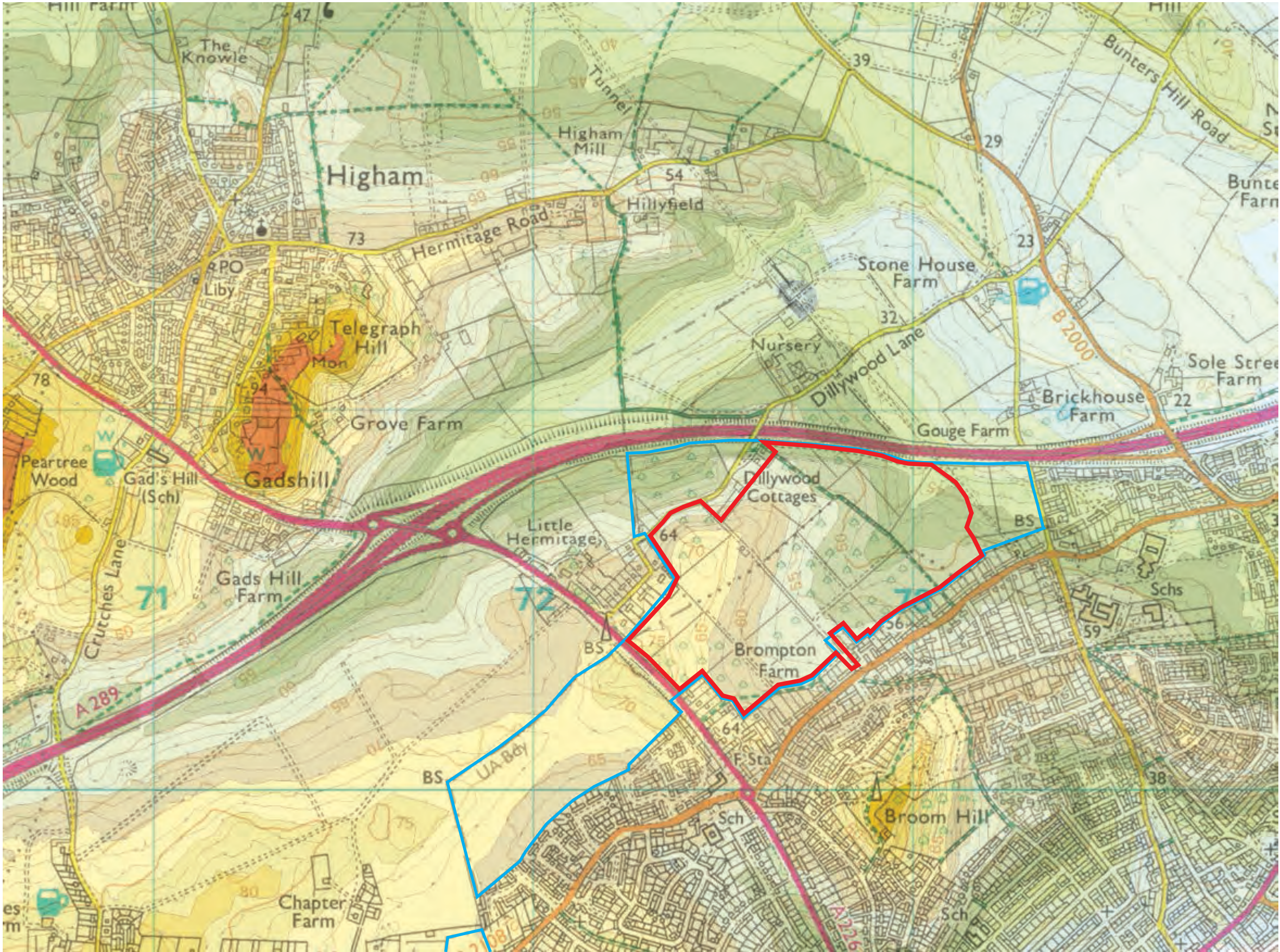
Crown copyright and database rights (2023)  
Ordnance Survey 0100031673  
\* Gravesham Local Plan Core Strategy Policies Map (Adopted September 2014)  
\*\* Medway Local Plan Proposals Map (2003)

Scarp

landscape architecture  
environmental planning

Client	Bellway Strategic Land
Project	Land at Strood
Dwg Title	Figure 2: Green Belt and Landscape Planning Designations
Dwg No	NTS Jan. 2023





**Notes**  
Crown copyright and database rights (2023)  
Ordnance Survey 0100031673

**Scarp** landscape architecture  
environmental planning

Client	Bellway Strategic Land
Project	Land at Strood
Dwg Title	Figure 3: Landform and Topography
Dwg No	NTS Jan. 2023





LAND AT STROOD

- Key**
- Potential Housing Development Site
  - Land Parcel 2 (Medway Green Belt Review)
  - ① Broom Hill
  - ② Telegraph Hill
  - ③ Gadshill
  - ④ Abbey Court Community Special School/ Temple Mill Primary School

**Notes**  
2022 Google Earth/Landsat/Copernicus

**Scarp** landscape architecture  
environmental planning

Client	Bellway Strategic Land		
Project	Land at Strood		
Dwg Title	Figure 4: Local Landscape Aerial Photograph		
Dwg No	NTS	Jan.	2023





## LAND AT STROOD

### Key

Potential Housing Development Site

**Notes**  
2022 Google Earth/Landsat/Copernicus

**Scarp** landscape architecture  
environmental planning

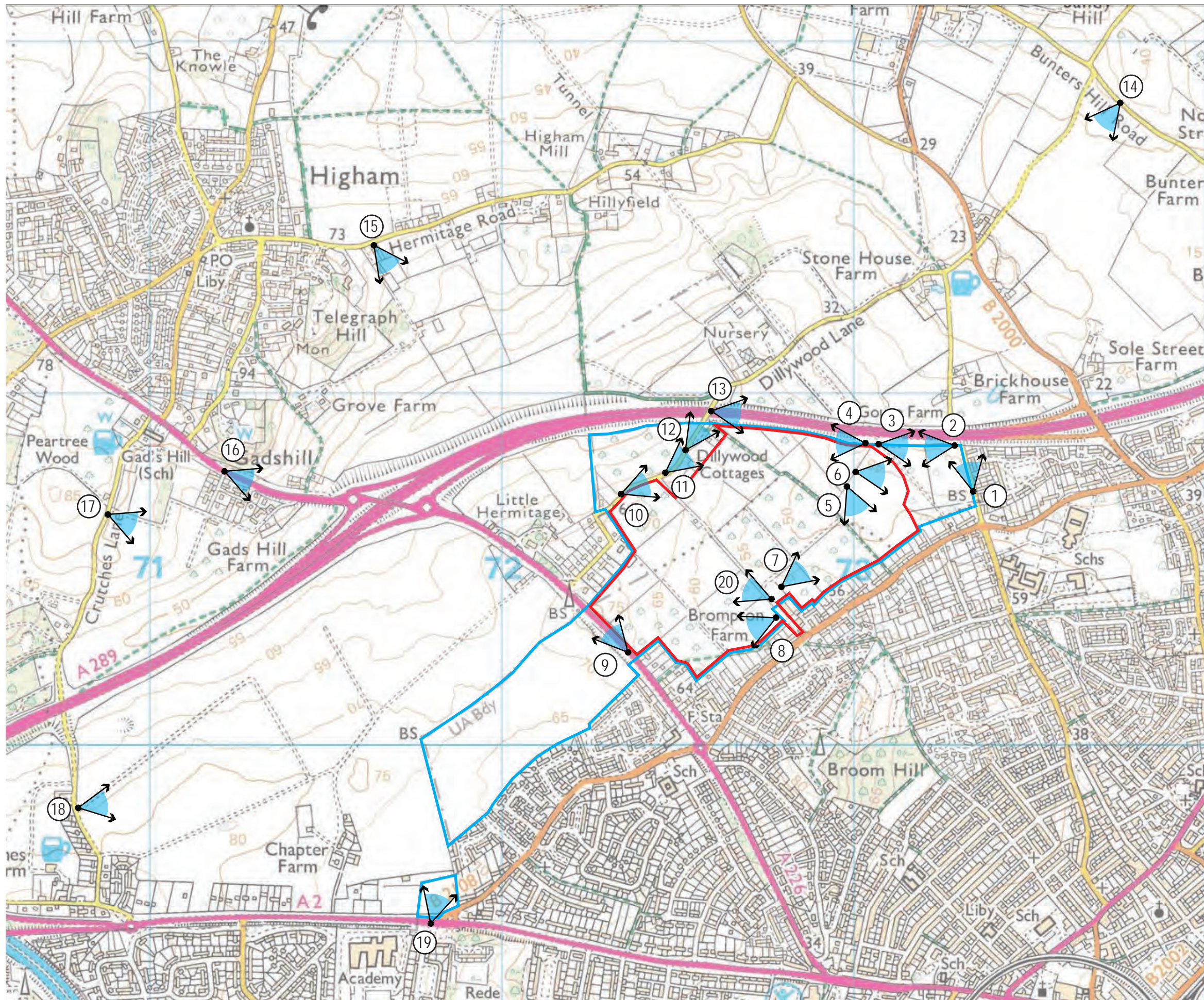
Client	Bellway Strategic Land
Project	Land at Strood
Dwg Title	Figure 5: Site Landscape Aerial Photograph
Dwg No	NTS Jan. 2023



## **Appendix A**

### **Site Appraisal and Site Context Photographs**





**Key**

- Potential Housing Development Site
- Land Parcel 2  
(Medway Green Belt Review)
- 1 Photographic Viewpoint Locations

**Notes**  
Crown copyright and database rights (2023)  
Ordnance Survey 0100031673

**Scarp** landscape architecture  
environmental planning

Client	Bellway Strategic Land
Project	Land at Strood
Dwg Title	Site Appraisal and Site Context Photographic Viewpoint Locations
Dwg No	

## LAND AT STROOD





**Photograph 1**  
View looking north along Stonehorse Lane



**Photograph 2**  
View looking west towards site from informal footpath



**Photograph 3**  
View looking east from eastern site boundary



**Photograph 4**  
View looking west along southern site boundary from informal footpath





**Photograph 5**  
View looking north to west towards existing urban edge





**Photograph 6**  
View looking east towards urban edge



**Photograph 7**  
View looking east across site from northern edge of Strodes Close housing area





**Photograph 8**

View looking southwest and west across site towards urban edge



**Photograph 9**

View looking north towards south-western site boundary with Gravesend Road



**Photograph 10**

View looking northeast along Dillywood Lane (1)





**Photograph 11**  
View looking northeast along Dillywood Lane (2)



**Photograph 12**  
View looking northeast and east towards Dillywood Cottages

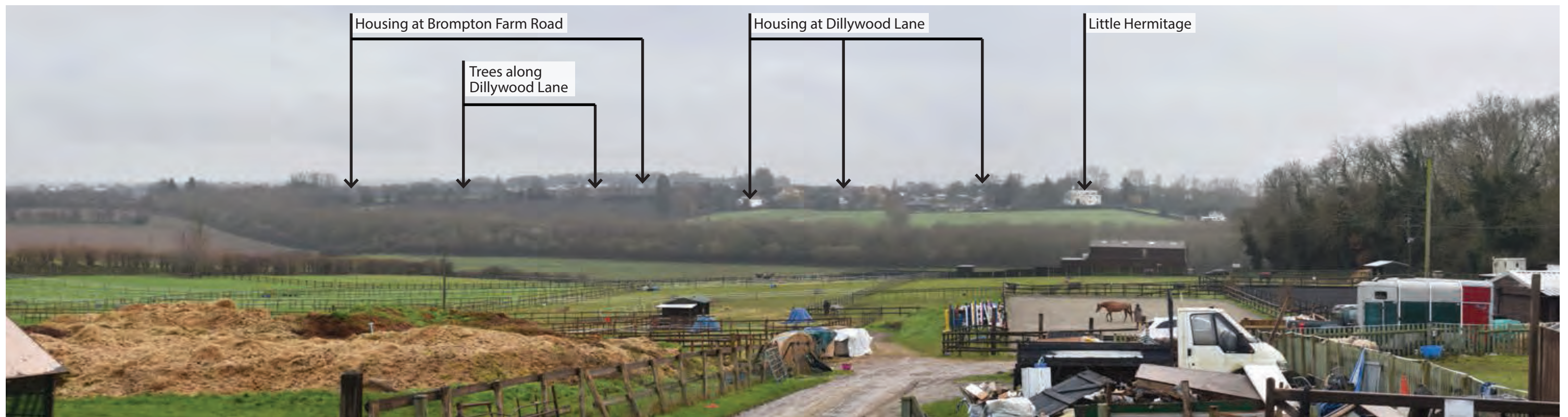


**Photograph 13**  
View looking east along A289 from Dillywood Lane overbridge





**Photograph 14**  
View looking southwest towards site from Bunters Hill Road



**Photograph 15**  
View looking southeast towards site from Hermitage Road





**Photograph 16**

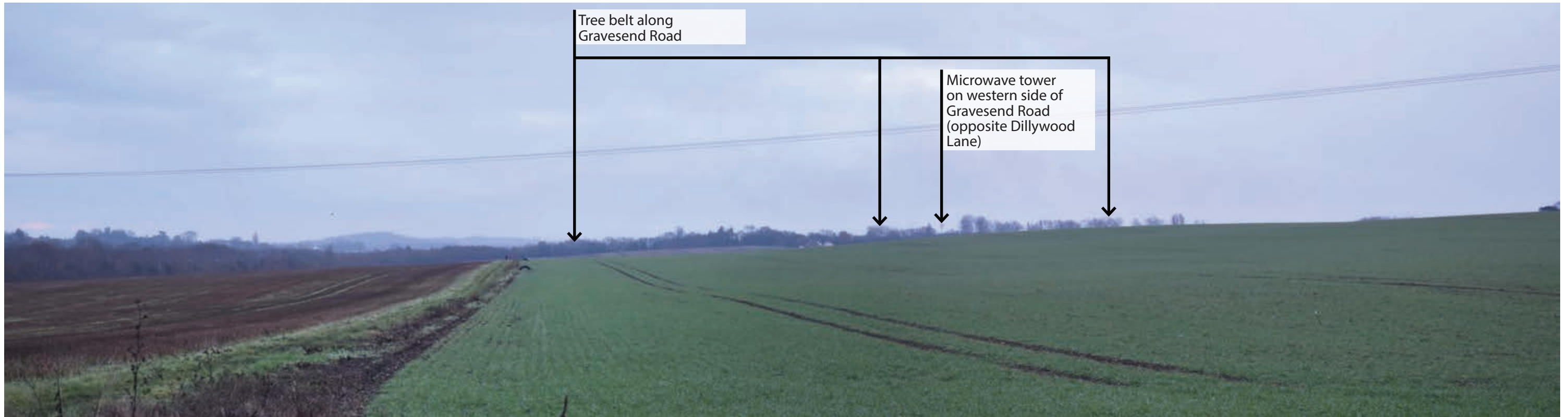
View looking southeast towards site from location on Gravesend Road near Gadshill



**Photograph 17**

View looking east towards site from upper part of Crutches Lane





**Photograph 18**  
View looking east towards site from lower part of Crutches Lane



**Photograph 19**  
View looking north towards eastern part of Rochester United Football Club from A2





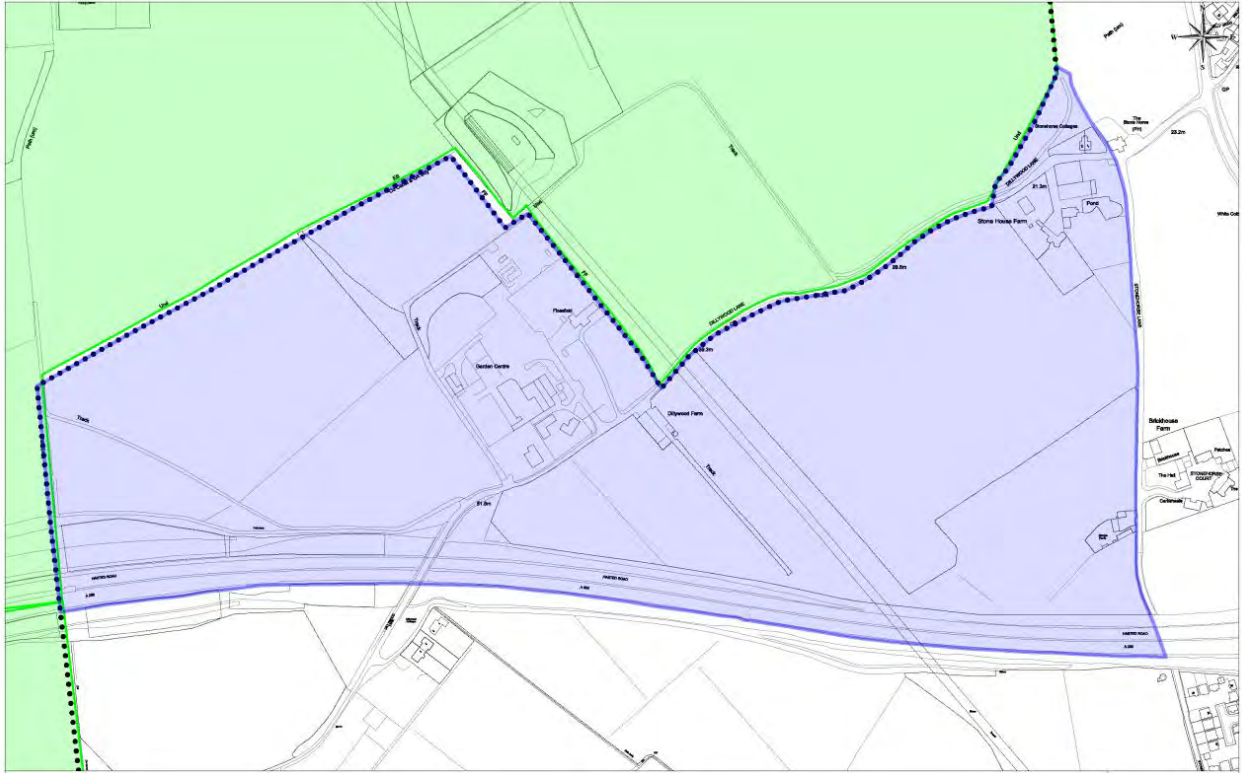
**Photograph 20**  
View looking west and north from northern edge of Strodes Close housing area

## **Appendix B**

### **Medway Green Belt Review Findings for Land Parcels 1 and 2**

## 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

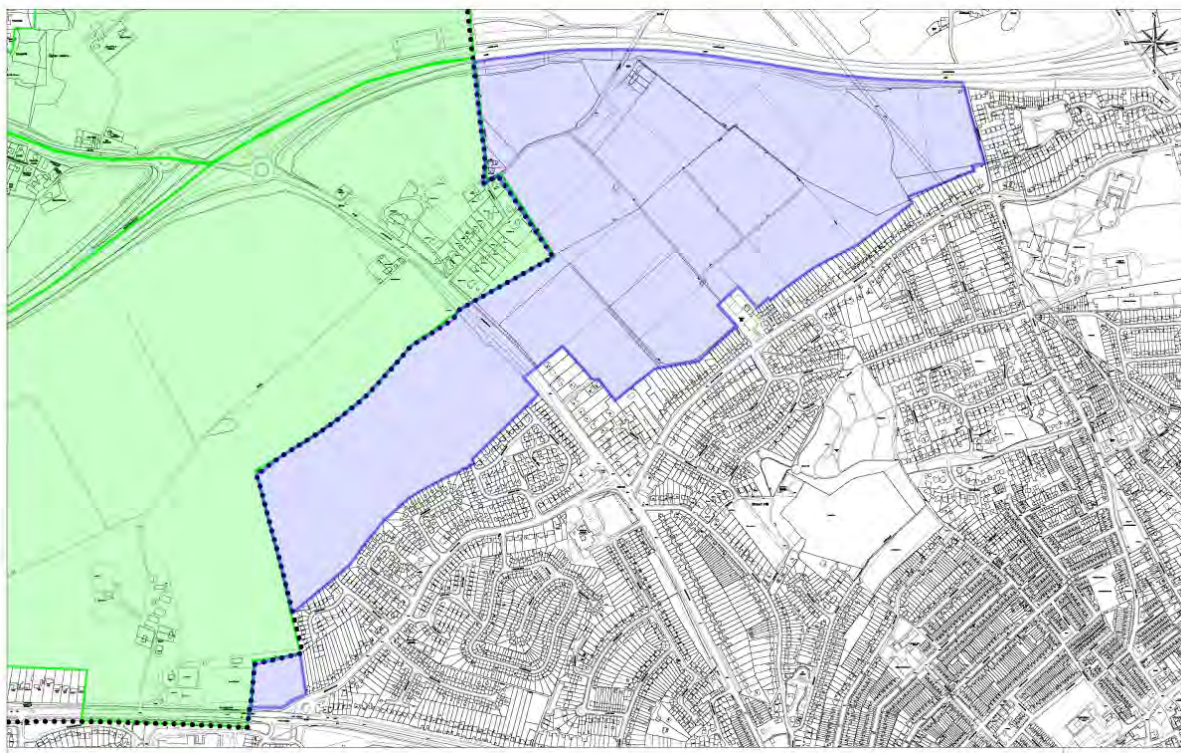


Fig 6

### 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.

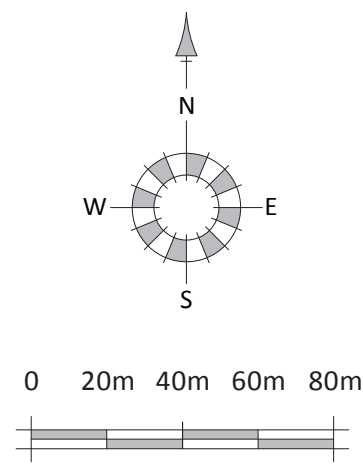
**Recommendation** No change to Green Belt.



## **Appendix C**

### **Indicative Master Plan**





- KEY**
-  Vehicular and pedestrian access
  -  Pedestrian access only
  -  Existing Public Right of Way
  -  Trim Trail
  -  Residential development parcels
  -  Footpath/cycle links
  -  Play areas
  -  Wildflower meadows
  -  Mown paths
  -  Viewing area
  -  Community orchard
  -  Community allotments
  -  SuDS features
  -  School site
  -  School playing fields



Illustrative Masterplan  
Brompton Farm Road, Strood  
**23020 / SK01**

Scale 1:2000 @ A1 February 2023



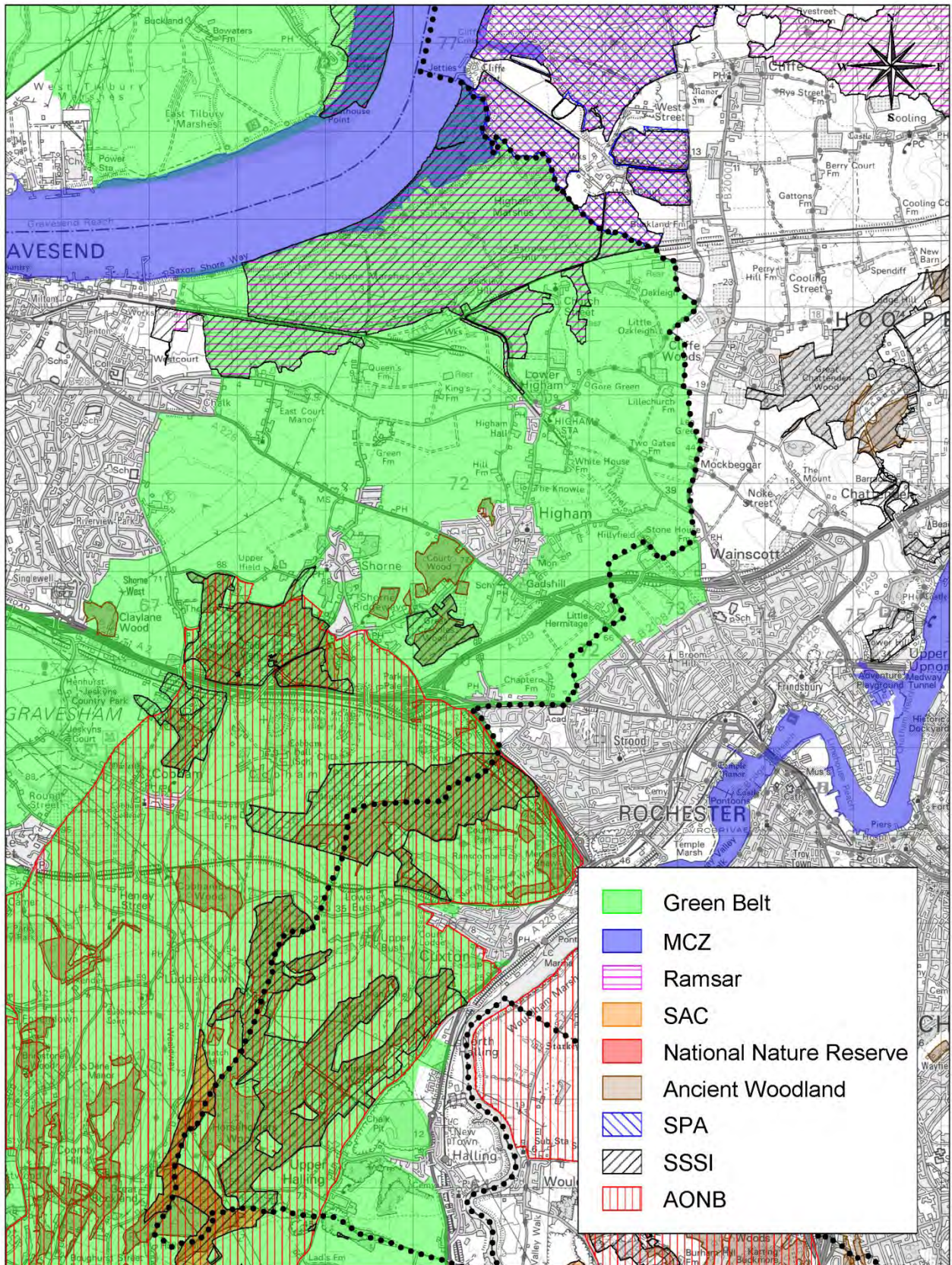
## **Appendix D**

### **Medway Green Belt Review Appendix B (Environmental designations)**



## Appendix B

### Environmental designations







Scarp Landscape Architecture Ltd Chiltern House Business Centre 45 Station Road Henley-on-Thames Oxfordshire RG9 1AT  
Tel: 01491 641524 E-mail: [info@scarpla.co.uk](mailto:info@scarpla.co.uk)

# Draft Medway Local Plan Regulation 18 Consultation

Land South of Lower Rainham Road, Gillingham





---

## Contents

1.	Introduction	1
2.	The Site	3
3.	The Proposals	6
4.	Comments on Regulation 18 Local Plan	8
5.	Conclusion	26

### Appendices:

- A. Vision Framework Rev. H (February 2023);
- B. Review of Medway Landscape Character Assessment (September 2024); and
- C. Transport Technical Note (August 2024).

# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



## 1. Introduction

- 1.1. Savills has been instructed by Catesby Strategic Land (Catesby) to prepare representations to the Draft Medway Council Regulation 18b Consultation (R18b). The Consultation on the Local Plan commenced on the 15 July 2024 and closes on the 8 September 2024.
- 1.2. These representations focus on the Land South of Lower Rainham Road (herein referred to as 'the Site'), which lies to the east of Gillingham between the areas known locally as Grange, Lower Rainham and Lower Twydall. The Site was re-submitted to Medway Council as part of the Call for Sites exercise between November 2022 and February 2023. The Site was subsequently identified under reference RN5 by the Medway Council (MC) as set out in the Land Availability Assessment (LAA). The Regulation 18a (R18a) consultation took place in September – October 2023. Catesby submitted representations to the R18a consultation and these should be read alongside the representations herein.
- 1.3. These representations are to respond to the R18b document including the questions asked by Medway Council. Additionally, these representations explain why the Site is suitable for a residential led, mixed-use development in isolation or together with surrounding sites.
- 1.4. The proposal would provide approximately 400 new dwellings which would be set within three distinctive new hamlets / clusters, a policy compliant percentage of which would be affordable housing, and the creation of a new community hub containing a new 1 form entry (1FE) primary school site, community rooms and local retail. The proposal also includes extensive multi-functional open space, landscape and biodiversity network and the provision of a new country park with the creation of new linked footpath and leisure routes through the development. Further details of the proposal are set out in section 3 of these representations.
- 1.5. The following documents are submitted with these representations:
  - Vision Framework Rev. H (February 2023);
  - Review of Medway Landscape Character Assessment (September 2024); and
  - Transport Technical Note (August 2024).
- 1.6. 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.
- 1.7. At examination, a Plan will be found 'sound' if it is considered to be positively prepared, justified, effective and consistent with national policy, as set out within Paragraph 35 of the NPPF. As such, ensuring that the Local Plan meets the tests of soundness is important throughout the Local Plan process. The observations made within these representations are to support Medway Council in preparing a sound plan.

# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham

---



- 1.8. It is noted that a new version of the NPPF is currently out for consultation and a new housing need requirement has been published. It is anticipated that a new NPPF will come into force by the end of the year and as the Medway Local Plan does not fall within the transitional arrangements, the new NPPF will be applicable for future consultations. References have been made towards increased housing provision within the consultation NPPF, the revised Housing Needs and the Written Ministerial Statement (30 July 2024).
- 1.9. As part of the Draft Local Plan consultation, Medway has published four documents in which observations have been made within this representation. These documents are listed below:
- Medway Local Plan Reg. 18b Consultation Document (July 2024)
  - Interim Sustainability Appraisal - June 2024
  - Landscape Character Assessment - June 2024
  - Strategic Transport Assessment - May 2024



## 2. The Site

- 2.1. The Site comprises four irregular-shaped, linked parcels of land to the east of Gillingham between the areas known locally as Grange, Lower Rainham and Lower Twydall. Together the parcels comprise 30.21 hectares of greenfield land in mostly arable use. The Site Location Plan can be seen in Figure 2.1 and has been identified by site ID RN5 in the land availability assessment (September 2023).
- 2.2. The Site is located to the south of the Lower Rainham Road where it adjoins Lower Twydall Lane. The western boundary of the Site is a field boundary just west of Eastcourt Lane. The east of the Site is bordered by open fields separated by hedgerows, and to the south east of the Site by an open field, also separated by hedgerows. There is also existing development along Lower Rainham Road and abutting the Site on Lower Twydall Lane.
- 2.3. A historic and remediated chalk pit is located within the eastern cluster of fields, the extents of which are defined by the mature tree and hedgerow lines.
- 2.4. It is noted that the Site has a gradual incline in ground level from Lower Rainham Road along the southern boundary. The remediation of the chalk pit has created a man made localised high point at around 25m.
- 2.5. The entirety of the Site is located within an Area of Local Landscape Importance as indicated on Map 4 of the adopted Local Plan policy maps. A designation, denoting the Boundary of Tidal Flood Area, is contained to the north of Lower Rainham Road and as such the whole of the site is located within Flood Zone 1 (representing the lowest risk of fluvial flooding). The Riverside Country Park is located immediately to the north of Lower Rainham Road.
- 2.6. The south of the Site is also immediately adjacent (but not within) the Lower Twydall Conservation Area. There are no listed buildings within the boundary of the Site, however there are a number of listed buildings that are located in close proximity to the Site. The majority of these comprise buildings within the Lower Twydall Conservation Area. These buildings are not positioned in such a way that would constrain the future development potential of the Site.
- 2.7. No other policy designations impact upon this site, and it is therefore relatively unconstrained.



# Draft Medway Local Plan Regulation 18b Consultation

## Land South of Lower Rainham Road, Gillingham



Figure 2.1: Site Boundary



### Neighbouring relevant planning application

- 2.8. An application (reference: MC/19/1566) for approximately 1,250 dwellings and supporting community infrastructure was submitted on the land to the south east of the promotion Site (application site known as "Land Off Pump Lane Rainham"). The location of this proposal can be seen in Figure 2.2. The application was refused on June 2020 and the subsequent appeal was dismissed by the Planning Inspectorate in November 2021 on the basis of landscape and visual impact and cumulative highways impacts.
- 2.9. Catesby has carefully reviewed this application and through this representation will outline why development in this area would be a suitable growth option for the Council to take forward through the plan making process.

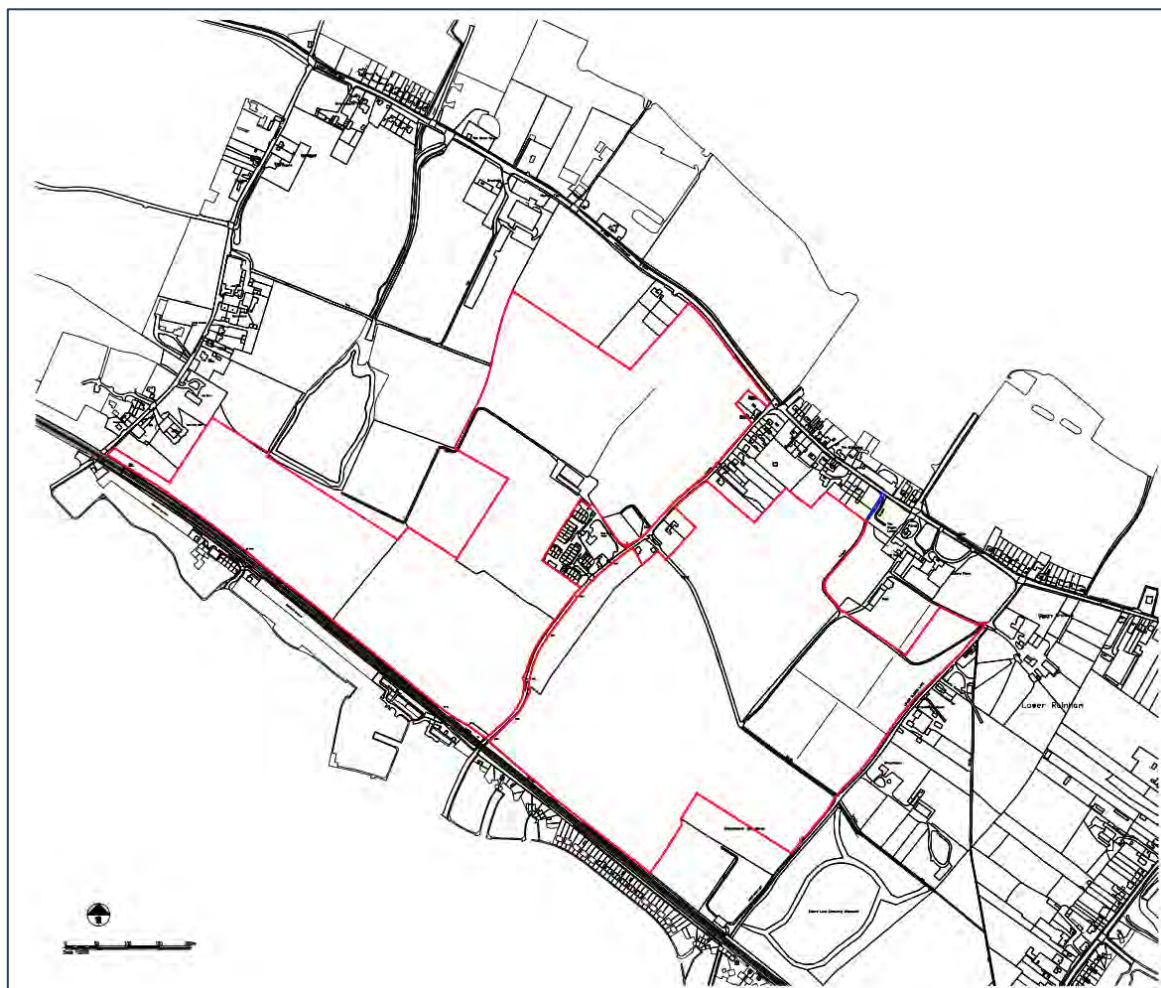


# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



Figure 2.2 – Site location plan of adjoining Land off Pump Lane, Rainham (reference: MC/19/1566)





## 3. The Proposals

The proposals seek to provide a new residential-led development with supporting community infrastructure. It has the ability to come forward in isolation or as part of a wider allocation within the surrounding suburban expansion area. A Vision Framework was provided with representations made to the R18a consultation and has been reattached to these representations (Appendix A). The Vision Framework outlines how the development proposal could come forward.

### New homes

- 3.1. The proposals would accommodate approximately 400 new homes with a mix of sizes and types. The housing would be set within three distinctive clusters reflecting the morphology and landscape characteristics of the surrounding area.
- 3.2. A policy compliant level of affordable housing in a mix of sizes and tenures will be provided as part of the proposal. The proposals can also provide dwellings as self-build housing should this be required, given the need highlighted within the Strategic Housing Market Assessment (SHMA). All homes will meet the required accessibility and space standards in accordance with the latest policy and building regulation requirements.

### A new community hub including a new primary school

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

### Open space and landscaping

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



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham

---



## Planning History

- 3.7. This Site has been promoted within the call for sites exercise which was conducted by Medway Council between November 2022 and February 2023. The Site was also promoted through the previous iteration of this emerging Local Plan. Representations were submitted to the MC Development Options Consultation on the Emerging Medway Local Plan “Future Medway” which closed on 18/04/2017.



## 4. Comments on the Evidence Base

4.1. MC has published some evidence base documents that support the R18B consultation. Of the documents that are published, the following are examined in this section:

- Interim Sustainability Appraisal - June 2024
- Landscape Character Assessment - June 2024
- Strategic Transport Assessment - May 2024
- Viability Assessment – December 2021

4.2. Catesby and Savills reserve the right to comment on any of the further evidence base documents as applicable to the site and as the LPR as it progresses through to examination and later adoption.

### Interim Sustainability Appraisal - June 2024

4.3. The completion of an SA is a legal requirement set out in Section 19 of the Planning and Compulsory Purchase Act 2004. The SA should assess the likely effects of the Local Plan when considered against alternatives. At Regulation 18 Stage, the SA should test the Local Plan against the proposed sustainable objectives, develop options and alternatives, evaluate the likely effects and consider ways to mitigate adverse effects.

4.4. In this case, Lepus Consulting (Lepus) has prepared an Interim Sustainability Appraisal (SA) which accompanies the R18B Consultation. The SA considers the growth options, spatial delivery option and the preferred sites against the 12 proposed Sustainability Objectives. The information in the SA refers to the growth options, the spatial delivery options and provides an assessment of all sites submitted through the Call for Sites.

4.5. It is also noted the SA provides information that MC has not published elsewhere. Table 8.15 provides the reasons that sites have been selected or rejected by MC but the full site assessments have not been published for review as part of this consultation. The Role of the SA is to assess the sites against the SA objectives to aid the delivery of sustainable development. It is considered that the assessment within the SA steps outside of the realms of the requirements for the SA and sites should be assessed to see if they are suitable, available and achievable through the Land Availability Assessment and then through the emerging development plan to determine which of the sites are most suitable in accordance with PPG Paragraph: 001 Reference ID: 3-001-20190722 .

### Growth Options

4.6. Table 3.2 outlines the assessed impacts of each growth option without consideration of potential mitigation or management of the effects. Thus, the SA cannot reasonably conclude which option would be better. Option 1 simply seeks to meet MC's housing need and Option 2 seeks to meet Gravesham Borough Council's (GBC) unmet need in addition to MC's housing need. Option 2 appears to have been rejected by MC on the basis that GBC has not provided additional information in relation to this and not on the merits relating to how the options would contribute to the achievement of sustainable development. Furthermore, it is likely that other neighbouring Local Authorities will struggle to meet their housing need particularly in



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



light of the amended housing targets such as Tonbridge and Malling. The option to meet this unmet need has not been considered in the SA.

- 4.7. Additionally, when considering the 'best performing option' set out in Table 3.2, option 1 has been marked as better performing despite being assessed to have the same impact as Option 2. Thus, this section of the assessment is incorrect and should be updated to the impacts identified in table 4.1 below.
- 4.8. In respect of Landscape and townscape, paragraph 3.2.9 of the SA simply explains that more housing 'may' increase development in landscape sensitive areas than option 1. It is not considered that the assessment in table 3.2 for option 2 as major negative is correct as it has not been demonstrated that provision of additional homes will permanently degrade Medway's landscape and townscape as it is likely that the impact can be mitigated. The assessment does not consider other factors that MC could incorporate such as densification and landscape mitigation. Consequently, it is considered that the impact to landscape should be minor negative to both.
- 4.9. Lepus has also concluded that option 2 will result in a major negative impact to natural resources. This is again on the basis that more housing will automatically result in a loss of best and most versatile (BMV) agricultural land. However, as stated in paragraph 4.8 of this representation, different design strategies and other mitigation may not result in any further impact to natural resources. Therefore, it cannot be concluded that the impact would permanently diminish natural resource with no viable mitigation. As such, the impact to natural resources should be minor negative to both.
- 4.10. Table 4.1 below sets out how the Catesby consider the growth option should have been assessed and identified that in both scenarios, the only difference is to the impact to housing. As option 2 provides more, this is identified as a better solution. MC should seek to deliver more housing in accordance with the emphasis in NPPF paragraph 60 to boost housing and also within the recent Written Ministerial Statement (dated 30 July 2024) which provides a clear direction for the country to build more housing. The SA has not demonstrated that the impacts of delivering more homes would have a significant impact against the sustainability objectives.

Table 4.1 SA assessment of Growth Options

Site Ref.	Climate change mitigation	Climate Change Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural Resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
Option 1	-	+/-	-	-	-	-	+	+/-	+/-	-	+/-	+
Option 2	-	+/-	-	-	-	-	++	+/-	+/-	-	+/-	+
Best performing option?	neutral	neutral	neutral	neutral	neutral	neutral	2	neutral	neutral	neutral	neutral	neutral



# Draft Medway Local Plan Regulation 18b Consultation

## Land South of Lower Rainham Road, Gillingham



### Spatial Delivery Options

- 4.11. Chapter 4 of the SA assesses the spatial delivery options. As part of this, SA Table 4.1 sets out the spatial delivery option in respect of the number of homes that could be delivered in different areas in Medway. The Land South of Lower Rainham Road, falls into the 'North of Rainham' area.
- 4.12. In relation to the assessment of the delivery of homes in these areas, the SA has assessed each area against the sustainability appraisal objective. The assessment of the area to the North of Rainham is disputed. The SA has failed to consider the mitigation that could be put in place and simply adopts the assumption that more development will result in a greater impact. However, MC have a certain amount of development that must be delivered to meet their needs and consequently, assessing spatial strategy option on an area by area basis results in predisposed results. For example, in respect of climate change mitigation, Lepus has assessed any area that has the potential to deliver over 2,500 homes to have a major negative impact which cannot be mitigated. Arguably, this assessment is an extension of the 'growth options' rather than spatial development options as ultimately there will be a cumulative impact of delivering homes anywhere in the MC administrative area.
- 4.13. In respect of the results against of SA4 (landscape and townscape), there is no assessment as to why the North of Rainham area has scored as major negative impacts. Whilst it is acknowledged that there would be some impact – as with all new development – it is not accepted that development in the North of Rainham would permanently diminish a very high receptor with no ability to mitigate any impacts. Consequently, the conclusions in respect of SA4 should be altered.
- 4.14. There is also no detailed assessment as to why the North of Rainham has been scored as Major Negatives or Minor Negative impact for SA6 natural resources, SA9 Cultural Heritage, SA10 Transport and Accessibility or SA11 Education. In all these instances, it is considered that reasonable mitigation can be provided to create neutral or positive impacts should the North of Rainham be developed.
- 4.15. In relation to SA8 Health and Wellbeing, the assessment explains that North of Rainham along with Capstone Valley and Medway City Estate are ranked second highest after the Urban and Chatham Docks areas. This is because they are considered to be within a sustainable distance to the NHS hospital and GP surgeries. Despite being ranked as one of the highest and within proximity to NHS services, the SA scored North of Rainham as Minor Negative Impacts which must be an error. Notwithstanding this, the assessment seems to concentrate on only NHS services and not other elements that contribute towards health and wellbeing of the SA objective to "*Safeguard and improve the physical and mental health of residents*". In respect of the proposed development at the Land south of Lower Rainham Road, the proposal will provide a network of green infrastructure which promotes physical activity, provides areas for social interaction and areas of tranquillity thus supporting physical and mental wellbeing. This alongside the proximity to health infrastructure should result in the North of Rainham area providing a positive impact.
- 4.16. Table 4.2 below sets the SA assessment of the North of Rainham area. Table 4.3 provides an updated assessment of Catesby's view on amendments that should be made to this assessment.



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



Table 4.2 SA assessment of the North of Rainham

Spatial Delivery option	Climate change mitigation	Climate Change Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural Resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
North of Rainham	-	-	-	-	-	-	++	-	-	-	-	+

Table 4.3 Catesby assessment of the North of Rainham

Spatial Delivery option – UPDATED ASSESSMENT	Climate change mitigation	Climate Change Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural Resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
North of Rainham	-	0	-	-	-	-	++	+	-	0	+	+

- 4.17. With these result, the development in this area would result in a higher ranking.

## Spatial Growth Option

- 4.18. MC has identified that that this area has the potential of delivering between 2,560 – 3,275 homes. The Spatial Growth Options are assessed in Chapter 5 and comprise:

- SGO1 – Urban Focus – maximising brownfield sites
- SGO2 – Dispersed Growth – higher release of greenfield and green belt sites
- SGO3 – Blended Strategy – a mix of both brownfield and greenfield/green belt sites.

- 4.19. The conclusion of the SA is that SGO3 is the best performing option. Catesby agree that this is the most suitable option for MC to take forward. Further comments on SGO3 are provided in Section 5 of this representation.

## The Site (RN5)

- 4.20. Section 6 of the of the SA provides an assessment of the reasonable alternative sites. The Land South of Lower Rainham Road has been identified under reference RN5. Despite the assessment of the sites not forming part of the evidence base supporting the R18B consultation, table 8.15 outlines the reasons sites have been selected or rejected from the Local Plan. In respect of RN5, table 8.15 states that it has been rejected on the following grounds:

*“loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impacts on listed building. Potential adverse impact on conservation area. Beyond reasonable walking distance to current public transport services.”*



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



4.21. These reasons are disputed. Taking each point in turn the following observations are made:

- **Loss of BMV Agricultural Land**

It is acknowledged that the site is identified on Natural England's Agricultural Land Classification Map as higher grade agricultural land (or Best and Most Versatile (BMV)). Paragraph 180 of the NPPF explains:

*Planning policies and decisions should contribute to and enhance the natural and local environment by:...*

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

The NPPF does not restrict the development of BMV land and instead MC must consider the economic benefit and any other benefits of this land being retained in agricultural use. In this respect, MC must also weigh up the benefits against delivering their housing need in sustainable locations.

Much of the land outside of the urban area in MC is considered to be BMV agricultural land with a proportion of this within the Green Belt. As identified within the Spatial Growth Option 3, the development of greenfield land (of which is generally BMV in MC) will help to deliver a wider range of homes than a brownfield alone approach and thus this is preferred. Consequently it is inevitable that BMV land will need to be used to deliver appropriate housing growth. As such, the loss of BMV at the Land South of Lower Rainham Road must be assessed against the benefits of the proposed developments and what it can provide for the existing community and how it can deliver against the needs of the Council. In this instance, Catesby consider that the proposal will provide new homes, enhanced active and public transport infrastructure, a primary school and multiple functional areas of open space in addition to other ecological, economic and environmental benefits.

- **Coalescence between settlements**

The site falls in an area of land between the built up area of Twydall and the River Medway. Settlements in this area are continuously connected and thus, the only coalescence that could occur is between developed area and the river. The area does not serve an important role in separating settlements that are continuously connected by London Road (A2) and Ito/Yokosuka Way (A289).



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



- **Impacts on Listed Building**

It is acknowledged that the site falls within proximity to some Grade II listed buildings. As set out within the Vision Framework, buffers will be provided within the site to respond to the setting of the listed building appropriately. As part of this, the proposals will be of sensitive design in respect of design, layout, scale, form and landscape to ensure the listed buildings and their settings are not adversely impacted by the development.

- **Impact on Conservation Area**

The location of the Conservation Area has been considered as part of the proposals set out in the Vision Framework. Catesby recognise the importance of the Conservation Area and surrounding setting to retain its distinctive character as a defined hamlet. The Concept diagram shows how a country park and significant woodland planting would be used to protect the Lower Twydall Conservation Area.

- **Proximity to transport services**

A Transport Technical Note supported our representations to the R18A consultation. Section 5 of the technical note details existing and potential improvements to walking, cycling and public transport services. It is clear from the assessment in SA Table 8.15 that MC has not considered this information. As such, an updated Technical Note Supports this Representation.

- 4.22. Two further tables in the SA provide an assessment of different sites against the SA objectives. SA Table 6.4 summaries the assessment all non-strategic site prior to any mitigation and SA Table 8.13 concludes the assessment of the site after mitigation. For the purpose of this representation, observations are only provided on the assessment of the site following mitigation as it is acknowledged a level of mitigation will be required for all proposed development sites.
- 4.23. The assessment of RN5 concludes that major negative impacts will be caused to Pollution and Waste (SA5) and to Natural Resources (SA6). Minor negatives are assumed for biodiversity and geodiversity (SA3), landscape and townscape (SA4), Health and Wellbeing (SA8) and Transport and Accessibility (SA10). Specific assessment for each site has not been given and so our assessment is based upon the technical work that has been completed to date and the proposed vision for the site.
- 4.24. In respect of pollution and waste (SA5), the proposed development of the site will not result in any greater impacts to environmental health than any other site. In fact, its connections to the existing built form via improvements to the existing cycle and public transport routes will promote sustainable transport modes reducing potential emissions from private vehicles accessing the new development. Runoff of pollutants from the site will be controlled via SUDS and other mechanisms rather than the discharge into the River Medway. The development of the site, currently in agricultural use, will stop the use of fertilisers and these running off into the river. As such, the score against should be significantly reduced to neutral.



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



- 4.25. As stated above, it is recognised that the site falls within land identified as BMV on Natural England's Agricultural Land Classification maps. MC will need to allocate land that is BMV and undertake a balancing exercise as to where the most sustainable locations are. However, in respect of Natural Resources (SA6) agricultural land value should not be the only determining factor in the assessment and consideration should be given to the impact on minerals and water assets. For instance, the site has limited coverage of a safeguarded mineral as set out in Figure 2 of the Minerals and Waster Topic Paper. Furthermore, the mineral that could be found in this area is chalk which is safeguarded across nearly the entirety of MC. In respect of water, the site is not in a water source protection zone and mitigation can be put in place to ensure water efficiency at the development. Consequently, it is considered that the score against this should be minor negative.
- 4.26. It is also recommended that, the assessment of Transport and Accessibility (SA10) should be minor positive on the basis that the improvements suggested within the Transport Technical note supporting this representation (and the last R18A representation) will benefit the wider community as well as those within the proposed development. These features will also benefit residents' health and wellbeing providing more opportunity for physical travels. This alongside the proposed green infrastructure will have multiple benefits for those living in, and visiting the nearby areas of the site. Consequently, it is considered that the score of Health and Wellbeing (SA8) should be minor positive.
- 4.27. Lepus assessment of the site against Catesby's assessment of the site is set out in table 4.4 below.

Table 4.4 SA assessment of RN5

Site Reference	Climate change mitigation	Climate Change Adaptation	Biodiversity and geodiversity	Landscape and townscape	Pollution and waste	Natural Resources	Housing	Health and wellbeing	Cultural heritage	Transport and accessibility	Education	Economy and employment
Lepus assessment of RN5	+/-	+	-	-	--	--	++	-	0	-	0	+/-
CATESBY Assessment of RN5	+/-	+	-	-	0	-	++	+	0	+		+/-

## Landscape Character Assessment - June 2024

- 4.28. The Landscape Character Assessment (LCA) (June 2024) has been completed by LUC on behalf of MC to support the emerging Local Plan. As part of the assessment, LUC has considered the character across different areas and defined them in specific Landscape Character Areas. In respect of the site, it is situated with LCA E1: Lower Rainham. LDA Design has reviewed the findings of the LCA and set out their conclusions in a supporting technical note which is appended to this representation (Appendix B). This technical note builds upon LDA Design's technical advice provided as part of the R18a Representations.



# Draft Medway Local Plan Regulation 18b Consultation

## Land South of Lower Rainham Road, Gillingham

4.29. Whilst LDA Design broadly agree with the appraisal, their note explains that:

*“it is considered that the Landscape Character Assessment ‘underplays’ the fragmented nature of the landscape, comprising a mix of arable land, orchards, grazing, and neglected parcels of land and overall poor condition of some areas. This was highlighted by the earlier Medway Landscape Character Assessment (2011) and verified through independent field study.”*

4.30. LDA’s Technical Note (Appendix B) continues to explain how the landscape strategy for the proposed development at the Land south of Lower Rainham Road would adhere to the guidance within the LCA:

- *Appropriate scale and extent of development that reflects the dispersed settlement pattern and follows the south-west to north-east orientation of lanes and fields.*
- *Development configuration and vernacular that reflects the character of the local villages rather than adjacent urban areas.*
- *Retention and enhancement of boundary vegetation and appropriate development offsets from adjacent roads to retain landscape structure and integrate the development into the landscape.*
- *New planting within the proposed development to create an attractive setting and further help integrate new buildings into the landscape.*
- *Landscape buffer containing productive orchards and public open space to limit adverse effects on the setting of the Lower Twydall Conservation Area.*
- *Retention and offset to Grange Road, which is designated as a Rural Lane. There is also potential to enhance the rural qualities, amenity, and biodiversity value of other ‘lanes’ adjacent to the Site by diverting vehicular traffic into the development.*
- *Creation of an extensive, well connected, and multi-functional network of public open spaces and areas for wildlife, including connections to the Riverside Country Park.*
- *New spaces and routes could be considered as an extension to the Riverside Country Park, alleviating existing visitor pressure and – through better pedestrian and cycle connectivity – minimising the need to access the County Park via car.*
- *Areas of public open space and routes to include appropriate signage, including interpretation of any important landscape and heritage features.*
- *Proactive management and maintenance of public open spaces and landscape features such as hedgerows and community orchards to maintain the long-term amenity and biodiversity interest.*

4.31. Subsequently, there is no reason why the land South of Lower Rainham Road should not be brought forward as an allocation within the emerging Local Plan in respect of landscape impacts.



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham

---



## Strategic Transport Assessment - May 2024

- 4.32. Stantec has undertaken a review of the Strategic Transport Assessment that has been completed by Jacobs on behalf of MC to support the emerging Local Plan. Stantec's review is included in a Technical Note (Appendix C). The Strategic Transport Assessment models four scenarios:
- **2041 Reference Case (RC)** – this includes completions, consented development, and infrastructure committed or planned up to 2041 in Medway. It also includes 'near certain' developments for adjoining authorities and TEMPro background growth.
  - **2041 Reference Case with Lower Thames Crossing (RC with LTC)** – a sensitivity test to understand the potential impact of LTC on the RC.
  - **2041 Do Something (DS)** – this builds on the RC with the inclusion of proposed Local Plan allocations and associated infrastructure.
  - **2041 Do Something with Lower Thames Crossing (DS with LTC)** – a sensitivity test to understand the potential impact of LTC on the DS.
- 4.33. Stantec has set out how the assessment of relevant junctions to the site has identified capacity in scenarios DS and RC. These scenarios have been considered given the uncertainty of the LTC. Given the capacity in the transport network and the range of routes available to residents to use (as detailed in the Transport Technical Note submitted with the R18a Representations), there is no transport reason that the development at the Land south of Lower Rainham Road should not come forward as an allocation.



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham

---



## Viability Assessment

- 4.34. The Explanatory Note for the Viability Assessment explains that MC is publishing the Viability Assessment 2021 which was drafted to support the former emerging plan. MC explain:

*"The Viability Assessment considers potential development sites and policies that were in the emerging draft plan in 2021.*

*There are now different proposed policies and development sites under consideration in the current Regulation 18 consultation.*

*"The Council notes the range of changes, but is publishing this document for consultation as part of the emerging evidence base for the new Local Plan."*

- 4.35. Catesby reserve the right to comment on an up-to-date viability assessment that relates to the drafted policies and requirements within the current consultations on the emerging Local Plan. MC is reminded that PPG Paragraph: 002 (Reference ID: 10-002-20190509) states:

*"The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan."*

- 4.36. There are several requirements suggested through the Local Plan and MC need to ensure that these will not render the Plan undeliverable and consequently, ineffective.



## 5. Comments on the R18B Consultation Document

- 5.1. This section of the representation considers the proposed spatial growth options, housing need and answers relevant consultation questions. The current R18b document aims to build on the responses to the previous R18a consultation 'Setting the Direction for Medway 2040' in Autumn 2023. Therefore, the comments in this section should be read alongside the representation made to the R18a consultation.

### Plan Period

- 5.2. The Plan Period is proposed to end in 2041. Given the Plan is expected to be adopted in 2026, this does not allow for a 15 year Plan Period in line with NPPF paragraph 22. As such, the Plan Period should be extended and the additional housing need for this period must be met.

### Spatial Growth Options

- 5.3. The R18B details three spatial growth options that Medway have considered. These have also been reflected in the SA. Spatial Growth Option 3 (SGO3) has been indicated as MC's preferred option currently and seeks to have brownfield first approach with a range of greenfield (suburban and rural) sites to come forward alongside this. Catesby is supportive of this approach as it will allow for a wide range of land to come forward to address MC's identified needs in accordance with NPPF paragraph 20. However, it is questioned whether the preferred sites indicated on the supporting Policies maps are able to accommodate sufficient quantum of the MC housing needs in addition to the sites be suitable to come forward for housing. No evidence has been published to demonstrate that the indicative sites are able to accommodate the proposed level of growth nor is there any evidence to demonstrate the delivery of the necessary infrastructure that will support this growth. The preferred approach is therefore not justified and would fall short of the requirements to ensure the Plan is Sound. Catesby considers that significant amount of work is required prior to the next consultation to ensure that the proposed spatial strategy is deliverable and supported by robust evidence. Only then can the Plan can be found Sound.

### Housing Need

- 5.4. Chapter 5 of the NPPF provides guidance for Local Planning Authorities in respect of delivering housing across England. The Written Ministerial Statement (WMS) published on 30 July 2024 sets out a new mandate that the standard method should be used as the basis for determining the local housing need. The WMS also emphasises that the standard method alone will not be sufficient enough to deliver the housing that is needed with a national target of 370,000 dwellings per year.
- 5.5. MC has indicated that they will seek to accommodate their identified housing need and paragraph 6.1.2 of the R18B consultation document states that as of March 2024, the need was for 1,658 dwellings per year. This does not take account of the unmet need in Gravesham Borough Council (GBC) which is identified at 2,000 new homes. Nor does it consider unmet need in other neighbouring authorities such as Tonbridge and Malling Borough Council.



# Draft Medway Local Plan Regulation 18b Consultation

## Land South of Lower Rainham Road, Gillingham



- 5.6. It is acknowledged MC's housing need is likely to have a minimal reduction following the changes in the method for calculating housing need published by the new Labour Government on 30 July 2024. Specifically, the revised housing need calculations indicate that Medway will need to deliver 1,644 dwellings per annum – a reduction of 14 dwellings per annum or 238 dwellings across the Plan Period. This should not, however, deter MC from seeking to boost the delivery of housing in their area and particular attention should be given to NPPF paragraph 67 which states:

*“The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment”*

- 5.7. In this case MC has identified specialist housing requirement for older persons and children in care as well as the unmet need from GBC.
- 5.8. MC should also note that in the revised housing standards, GBC's housing need has increased by 32 dwellings per annum. On the basis that Gravesham were already struggling to accommodate this housing need, MC should seek to accommodate a significant proportion of GBC's unmet need to ensure that MC's Plan has been positively prepared. With this in mind, it is likely that MC will need accommodate more growth and allocate further housing sites.
- 5.9. MC's Authority Monitoring Report (2023) identifies that MC has failed to deliver its housing need since 2018/19 and over the past five years there is a deficit of 3,362 dwellings. This demonstrates a clear need for MC to be planning to boost their housing need to accommodate the past under delivery. Moreover, it emphasises the importance of due diligence in the site selection process to ensure their deliverability.
- 5.10. It is clear that MC need to boost their housing need to support their own identified need, their previous under delivery and to support GBCs unmet need. The LAA and the SA assessment of site demonstrates that sufficient land is available for MC to not only meet their identified need but seek to accommodate more growth. MC now need to provide robust evidence to support a spatial strategy that is deliverable and flexible enough to allow for alternatives when there are delays in delivery . Currently, Catesby consider that there is insufficient evidence to support any type of spatial strategy and thus, the preferred site allocations cannot be considered sound.
- 5.11. In respect of the Land South of Lower Rainham Road, Catesby has submitted technical base documents (with these and previous representation) providing evidence that demonstrates that the development of 400 dwellings is deliverable. Therefore, MC should allocate this land to boost their identified needs.

### Consultation Questions

- 5.12. The following paragraphs seeks to answer all relevant questions in the R18B document. Where no answer is provided, Catesby has no comments at this time. Catesby reserves the right to comment on all aspects of the emerging plan at future consultations.



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



***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?***

- 5.13. As a starting point MC should seek to meet the standards set by national policy / regulations. Any requirements beyond this must be sufficiently evidenced as necessary and relevant to Medway. Evidence must also be provided to ensure that the implementation of such standards do not render development proposals unviable. This should be taken into account with other requirements set within the emerging Local Plan or national requirements. MC is reminded that standards and technology relating to climate change are continuously advancing and evolving, thus, it is essential that any policy relating to specific standards must ensure it is flexible.

***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?***

- 5.14. Paragraph: 006 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."*

- 5.15. This clearly indicates the Government's position on Local Authorities setting higher BNG targets and only where there is evidence to demonstrate that locally there is a clear need to increase these targets should a higher target be set. Whilst Kent County Council (KCC), may have provided some viability evidence, it is not considered that this looks closely enough at the local requirement for additional BNG in Medway. Thus, should Medway seek to increase targets they would be required to provide their own robust evidence to justify such a position.
- 5.16. In respect of viability and BNG, MC are reminded that there will be instances where it is not possible to reach the BNG requirement onsite and therefore offsite mitigation will be required. MC is encouraged to provide sufficient offsetting land at a reasonable cost to ensure the purchase of offsite credits does not render a development unviable. This should be tested via a wider viability assessment to ensure all measures imposed by the emerging Local Plan are deliverable.

***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.***

- 5.17. A tariff to support the delivery of the SAMMS programme should be sufficiently evidenced to justify:

# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



- The need for the tariff;
- The type of development that the tariff applies to,
- The location of the development; and
- The amount of the tariff.

- 5.18. Should the evidence justify that such a tariff is required, it should be tested within the viability assessment to ensure the inclusion of the tariff does not impact the delivery of the development.

***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?***

- 5.19. NPPF Paragraph 180 sets out that planning policies should contribute to and enhance the natural and local environment. Part of this is to protect and enhance valued landscapes. There is no requirement for MC to specifically designate landscapes of local value and given that the land to the west of the main urban area is already subject to the statutory Kent Downs National Landscape designation other land within the borough is subject to other existing statutory designations (Special Protection Areas, Local Nature Reserves and Local Wildlife Sites), the introduction of yet another designation could unreasonably obstruct the delivery of necessary housing growth.
- 5.20. Consequently, the protection and enhancement of landscape in accordance with national policy should be sufficient to protect landscapes of value.
- 5.21. Notwithstanding this, if MC decide to designate any areas special attention will need to be taken for the following criteria set out within the Guidance for Assessing Landscape Designations (Natural England 2021):
- a) Sufficient evidence should support the designation of any area specifying the landscape qualities of the area.
  - b) Ensure the correct area is designated and not a blanket designation
  - c) Provide clear guidance for how development can come forward within these areas to ensure that the vision and needs for Medway are deliverable

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

- 5.22. The promotion of Natural England's Green Infrastructure Framework Standards are suitable to include within the MC Local Plan and Catesby support this approach. However, sufficient flexibility should be provided to ensure that where the framework is not applicable or where they framework changes over time, allowance is provided within the Policy. MC are also advised to provide evidence into how these principles can be implemented across development in the area without prohibiting the delivery of development the area needs.



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



- 5.23. In respect of the proposed development at the Land South of Lower Rainham Road, the proposal seeks to incorporate a network of greenspaces that are connected to one another and to those outside of the site. The open space will provide a variety of benefits to all and serve multiple functions such as for leisure, informal sports, tranquillity, growing, ecology and other purposes. Catesby understand the positive impact that connected and accessible green infrastructure makes to people and the environment and seek to incorporate it into the principles of their proposals from the start. This is demonstrated within the Vision Document that was submitted to MC at the R18 in 2023. This Vision Document is submitted with these representations also.

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

- 5.24. In accordance with Chapter 13 of the NPPF, there is currently no requirement for Local Authorities to review the green belt, however, where they do, exceptional circumstances must be fully evidenced and justified. Catesby accept that MC have reviewed their Green Belt and that some Green Belt land may come forward for development as part of this review. However, in accordance with NPPF paragraph 146, MC should be able to sufficiently demonstrate that there are not other opportunities outside of the Green Belt that would be suitable to come forward prior to the release of Green Belt land. In this instance, the Land South of Rainham Road is not within the Green Belt and able to deliver approximately 400 homes.

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

- 5.25. As above, MC need to ensure that they have fully reviewed other available options before releasing land from the Green Belt including the readily available site comprising Land South of Lower Rainham Road.

***Question 9: Should this policy be broadened out to areas adjacent or near to Conservation Areas rather than only within? If so, please explain why***

- 5.26. Paragraph 5.10.3 of the R18B Consultation Document states:

*“The NPPF sets out what is to be taken into account when determining applications which includes positive contributions to the area and revealing its significance.”*

- 5.27. To ensure consistency with the NPPF and to avoid unnecessary duplication, draft Policy DM10 should seek to reflect the principles within the NPPF. It is also noted that the draft Policy DM10 requires development proposals to “have due regard to the setting of the Conservation Area”. The NPPF defines the setting as:

# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



*“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”*

- 5.28. Consequently, the draft policy already considers the relevant areas outside or adjacent to the Conservation Area.
- 5.29. Catesby considers that it is imperative that the draft policy is in accordance with national policy to ensure the soundness of the plan. In relation to the proposals for development on Land south of Lower Rainham Road, appropriate buffers will be provided to the Lower Twydall Conservation Area to retain its distinctive character as a defined hamlet and to respond to the setting of the listed buildings as appropriate. This requirement could be easily incorporated into a site specific policy wording.

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

- 5.30. For a policy to be effective it must be deliverable over the plan period and based on cross-boundary strategic matters. Draft Policy T2 explains that residential development will not be permitted if it encourages a sustainable mix of housing and refers to the latest Local Housing Need Assessment to inform the housing mix. Neither a Local Housing Need Assessment nor a Statement of Common Ground relating to housing mix has been published to support the R18B Consultation. As such, it is not possible to confirm whether this policy is completely effective. However, there are alterations that should be made to make the drafted policy more effective in respect of the delivery of a range of house types.
- 5.31. The draft policy, as drafted, is not written clearly to allow an applicant or decision maker understand how the policy is implemented. For example at one point the policy notes that the housing mix should be appropriate to the size, location and characteristic but also refer to the Local Housing Needs Assessment. Clarity should be provided.
- 5.32. The draft policy also refers to affordable housing but fails to recognise that draft policy T3, relates to the provision of affordable housing. It is recommended that Policy T2 simply refers to policy T3 for requirements on affordable housing. This will avoid confusion and unnecessary duplication.

## **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?**

- 5.33. In applying affordable housing thresholds, MC need to ensure that developments are still viable. Draft Policy T3 explains that the level of affordable housing required is informed by the Local Plan Viability Assessment. The published viability assessment is dated December 2021 and was prepared to support a previous Regulation 19 Local Plan Consultation for a previous iteration of the emerging Local Plan. It is



# Draft Medway Local Plan Regulation 18b Consultation

## Land South of Lower Rainham Road, Gillingham



therefore considered to be out of date and should be amended to reflect current trends and policy decisions.

- 5.34. Notwithstanding the above, Catesby consider that 30% affordable housing on greenfield sites to be deliverable for the proposals for development on Land South of Lower Rainham Road.

***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?***

- 5.35. The split of tenure should be informed by up to date housing needs assessments or SHMA. Flexibility should be incorporated into the policy to allow for the changing circumstances across the Plan Period and for differing site characteristics. As this has not been published Catesby cannot comment on what would be an appropriate tenure split. However, consideration into the range of housing types that are required should form part of MC's spatial strategy. NPPF paragraph 63 explains "*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies*". Consequently, the site allocated within the Plan should be able to deliver all housing needs and in the correct location. Therefore, this information should be readily available at the time of publishing preferred allocations for housing.

***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?***

- 5.36. There may be occasions where onsite provision of affordable housing is not suitable or viable and so mechanism for securing off site affordable housing is considered acceptable. However, further information should be made available as to how the Council anticipate offsite affordable housing coming forward. On sites such as the Land South of Lower Rainham Road, policy compliant affordable housing can be delivered onsite. The viability of sites and their ability to deliver on site affordable housing should be a material consideration when allocating sites for housing.
- 5.37. In terms of the cascade principle it is clearly right that local people in need of housing in their local area should have first refusal on new affordable housing as it becomes available and that where surplus affordable housing remains this should then be allocated based on the council's housing needs register.

***Question 15: Do you have any sites you wish to promote for self-build allocation?***

- 5.38. No. However, the development proposals at the Land South of Lower Rainham Road are able to deliver self-build plots should they be required to meet any specifically identified need.

# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham



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

5.39. NPPF paragraph 96 is clear how planning policies should aim to achieve healthy, inclusive and safe places to live. PPG Paragraph: 001 Reference ID:53-001-20190722 goes further and explains:

*“Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).”*

5.40. Whilst Draft Policy T27 appears to go beyond the national requirements, Catesby do not object so long as sufficient evidence is provided to demonstrate the need for these provisions and to ensure that they are viable. In this respect, the proposals for development on Land South of Lower Rainham Road will provide a multitude of health benefits to new and existing residents in the area. These include (but are not limited to):

- Activity incorporated into the design allowing and encouraging a range of physical activity;
- Incorporation of inclusive design principles to encourage areas for social interaction for all;
- Provision of a network of green and blue infrastructure which provides various functions including country park, community orchard, sports etc.;
- Reduces and mitigates against any environmental health hazards;
- Provision of high quality public spaces;
- Delivery of affordable homes in line with MC's need;
- Access to health and social services via active / public transport modes.



## 6. Conclusion

- 6.1. These representations have been prepared on behalf of Catesby in relation to the land south of Lower Rainham Road (identified as site RN5 in the Council's LAA).
- 6.2. Throughout this representation the benefits of the proposal are set out. These include:
- The delivery of 400 new homes in a mix of sizes and types set within three new distinctive hamlets/ clusters influenced by the established morphology and landscape characteristics;
  - Policy compliant provision of affordable housing in a mix of sizes and tenues;
  - Potential to accommodate a community hub containing a new 1FE primary school site, community rooms and local retail;
  - Delivery of a range of new children's play areas;
  - Pedestrian cycle links;
  - Extensive multi-functional open space;
  - Delivery of an additional area of country park through which a network of pedestrian routes can pass and link between the three hamlets and existing Riverside Country Park;
  - Creation of new linked footpath and leisure routes and provision of new safe routes to surrounding community and leisure uses; and
  - Catesby is willing to work with adjoining landowners to assist with the delivery of a sustainable suburban expansion on Lower Rainham Road.
- 6.3. It is evident that the ultimate goal of the Medway R18b document is to achieve sustainable development and this goal is strongly supported by Catesby and it is considered that Spatial Growth Option 3 is the most suitable way for development to come forward. However, Catesby consider that MC should be going further and be seeking to accommodate more housing growth to offset the historic under delivery of housing as well as providing for a reasonable proportion of Gravesham Borough Council's unmet housing need. The Land South of Lower Rainham Road would assist Medway Council in achieving their identified needs and sustainable development.
- 6.4. Catesby thank Medway Council for the opportunity to provide comments on their Regulation 18 Local Plan. We reserve the right to comment on any further Local Plan consultation and the published evidence.

# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham

---



---

## Appendix A Vision Framework Rev. H

---





# GILLINGHAM KENT

A VISION FOR GROWTH AT  
LAND SOUTH OF LOWER  
RAINHAM ROAD

# Contents

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

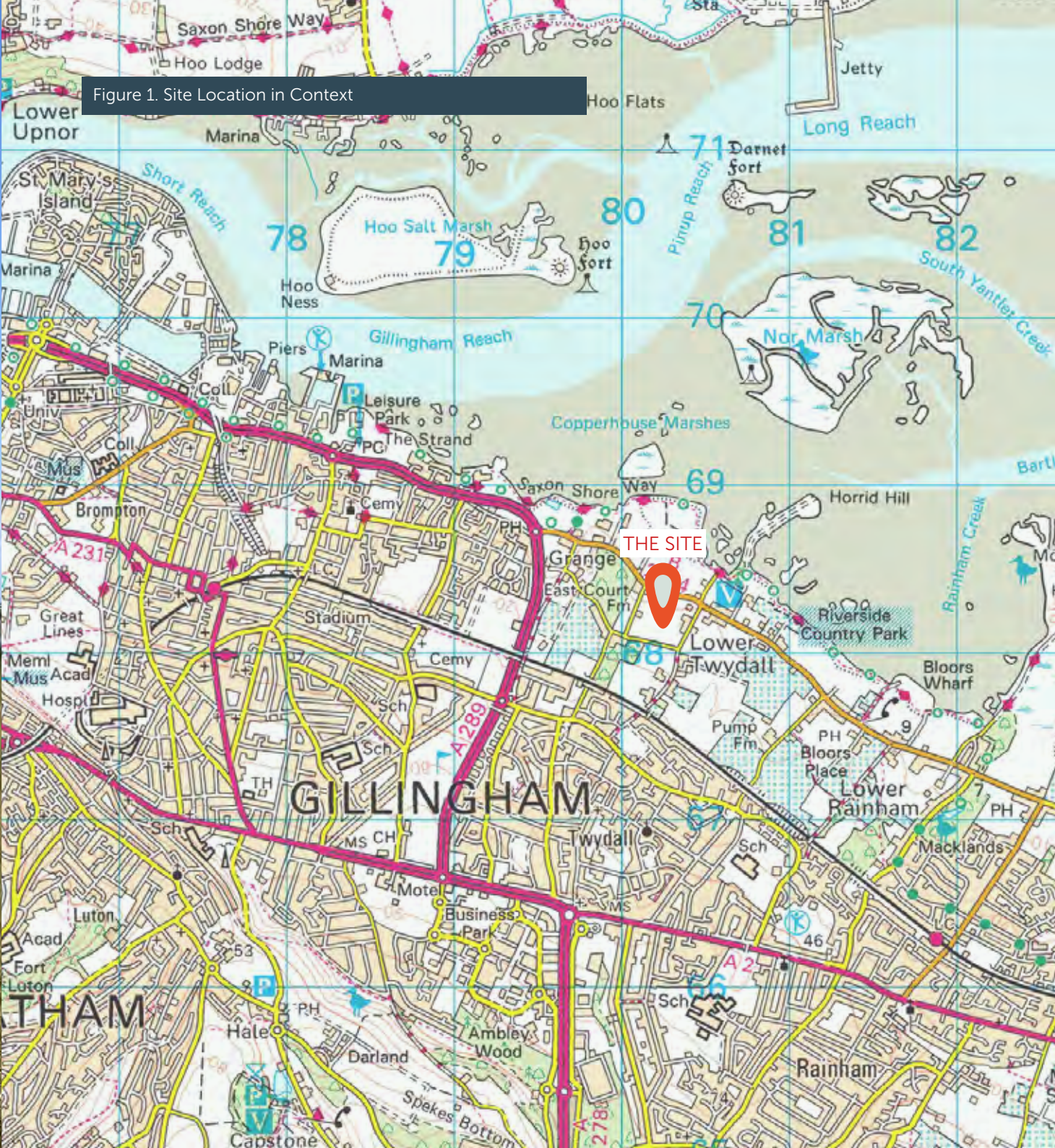


VISION:  
Creating three  
distinct hamlets to  
support an enhanced  
and productive landscape  
in the Kent Fruit Belt

Revision	H
Author	AP
Issue Date	27/02/2023



Figure 1. Site Location in Context



## Introduction

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

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

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

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

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



## Site & Context

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

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

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

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

### Neighbouring Context

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

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

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

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

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

## Planning Context

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


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

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



Figure 2. Site Boundary



 Site Boundary



# The Opportunity

## THE CONTEXT

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

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

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

## AN OPPORTUNITY FOR ORGANIC AND LOGICAL GROWTH

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

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

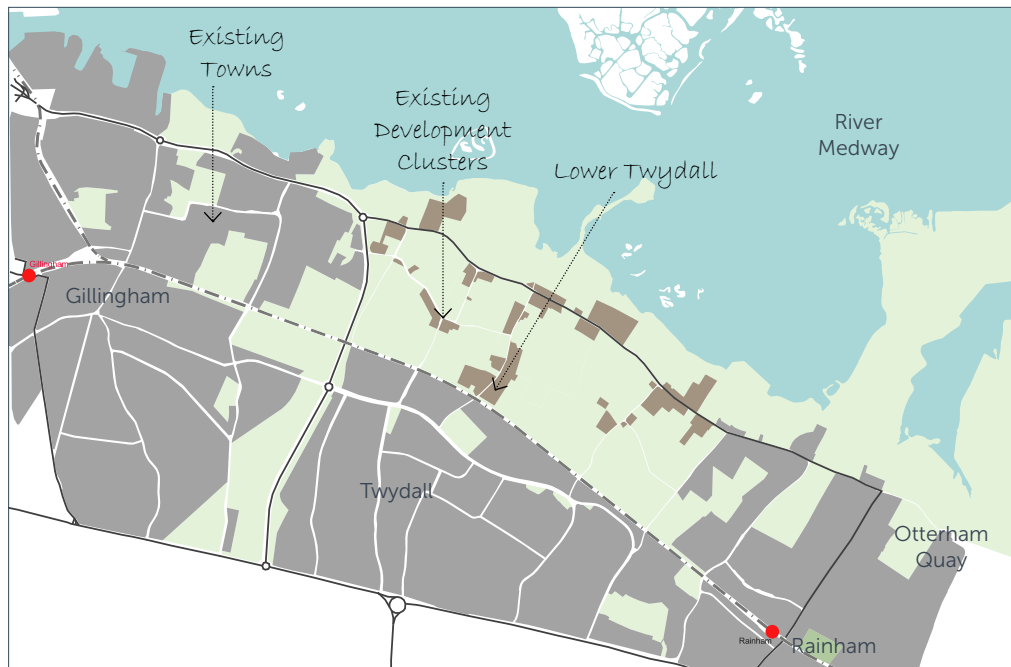


Figure 3. Existing Settlement Pattern

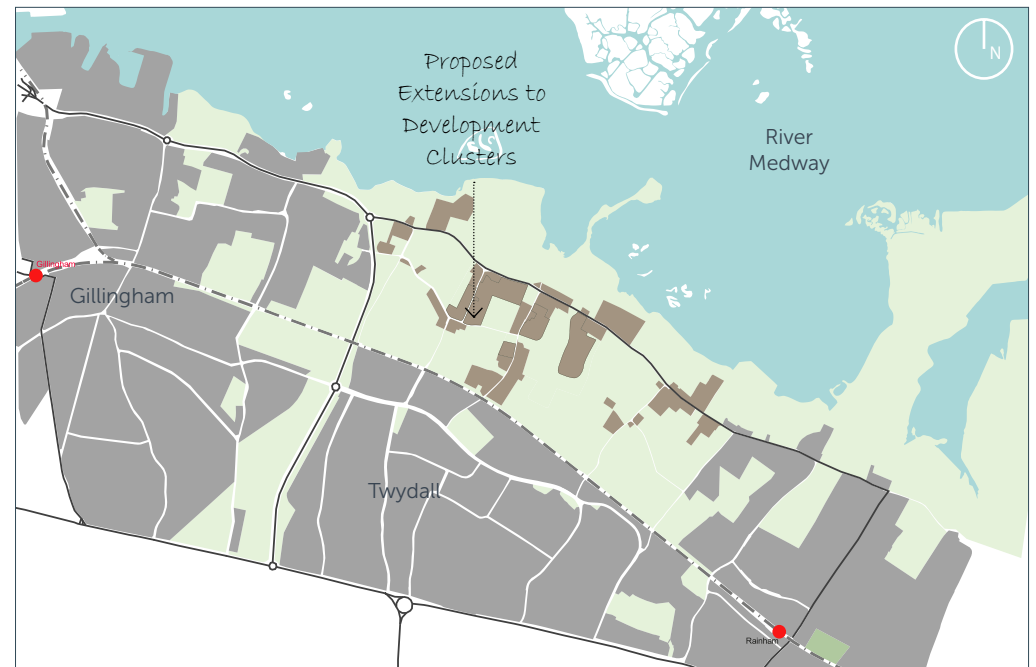


Figure 4. Logical Organic Growth of Cluster / Hamlets



# Design Principles

## DISTINCTIVE HAMLET/ CLUSTER CHARACTERS

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



Figure 5. Delivering Three Distinct Clusters / Hamlets

## A PRODUCTIVE AND ACTIVE LANDSCAPE

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



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

# Landscape Character Review

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

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



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

# The Concept

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

## Development of the Site can deliver the following benefits:

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

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



Figure 7. The Concept Diagram





# A Sustainable Location

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

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

## MIXED USES

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

## WALKING / CYCLING

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

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

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

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

## PUBLIC TRANSPORT

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

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

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

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

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

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

## FUTURE GAME CHANGERS

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

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

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



# Other Matters & Conclusion

## Deliverability

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

- Be Available
- Be Suitable
- Be Achievable

The Site satisfies each of the NPPF criteria as follows:

### Available

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

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



### Suitable

The site is suitable for housing development because it:

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



### Achievable

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



## CONCLUSION

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

# TECHNICAL APPENDIX

## Site Features Analysis

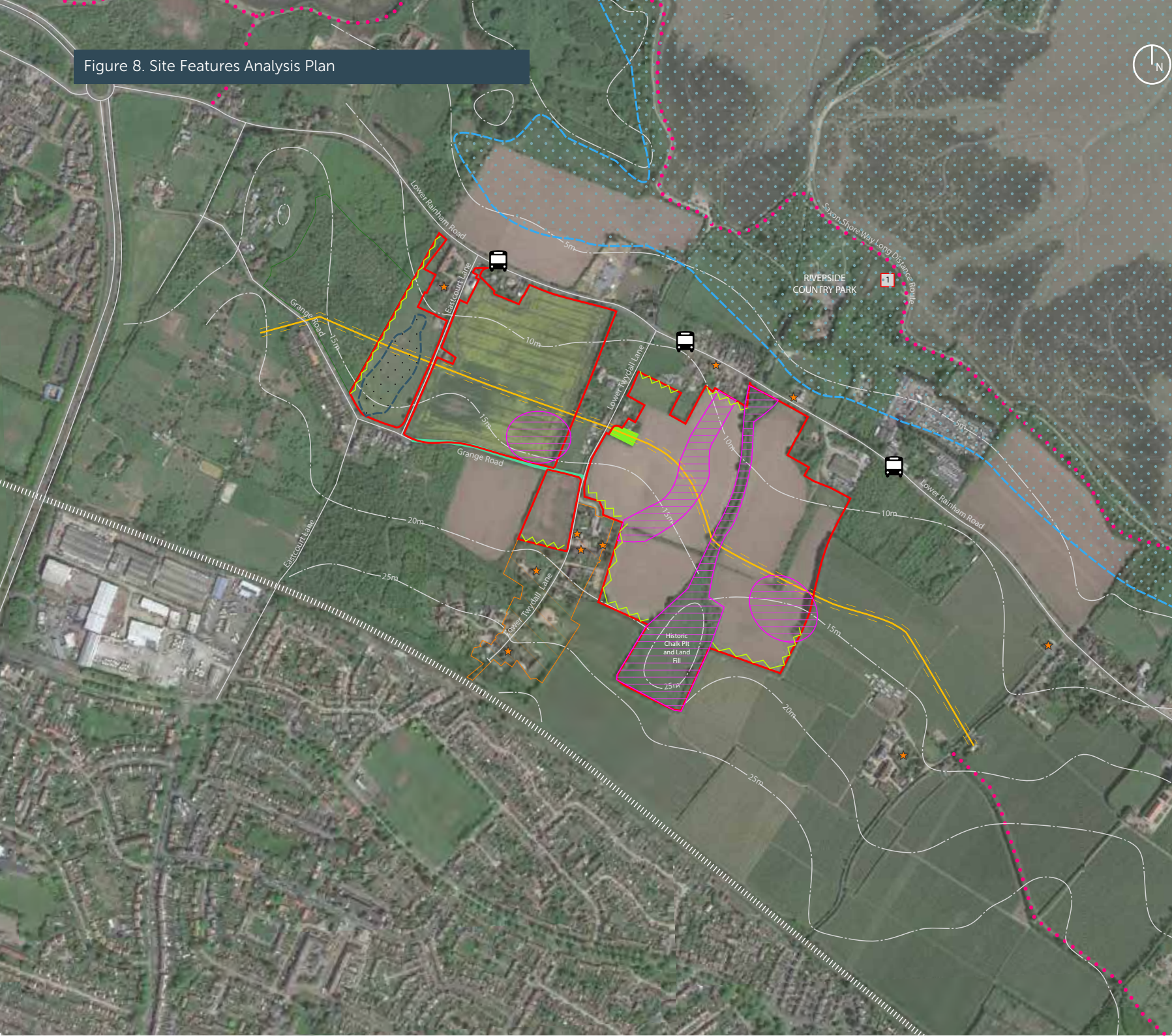
Following analysis of environmental and technical features of the Site the following table and plan confirm that there are no significant physical, environmental or technical constraints to developing the site for residential use. This plan underpins the development rationale and concept masterplan section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

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

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



Figure 8. Site Features Analysis Plan



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



# TECHNICAL APPENDIX

## Access and Movement Analysis

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

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

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

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

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

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

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

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





Figure 9. Local Movement Analysis



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

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

---

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

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



---

## Appendix B

### Review of Medway Landscape Character Assessment (September 2024)

---

# Rainham Road, Gillingham, Medway District, Kent – A Proposal for a Sustainable New Neighbourhood

Review of Medway Landscape Character Assessment (June 2024)

September 2024

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

W [www.lda-design.co.uk](http://www.lda-design.co.uk)

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

---



**Contents**

1.0 Introduction ..... 1

2.0 The Site ..... 2

3.0 Landscape Character Assessment ..... 4

4.0 Landscape Commentary ..... 7

5.0 Conclusion and Next Steps..... 10

Version: 0.1

Version date: 6<sup>th</sup> September 2024

Comment Final

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

7092



## 1.0 Introduction

LDA Design was commissioned by Catesby Estates in 2020 to act as landscape architects in relation to a proposed sustainable new community at land off Rainham Road, Gillingham in Medway District, Kent ('the Site')

A 'landscape, visual and heritage' appraisal was submitted – alongside a Vision Document – to Medway District Council (MDC) as part of their 'call for sites' in Summer 2020. This included an appraisal of likely landscape, visual and heritage effects; design and mitigation measures; and the emerging landscape-led masterplan concept.

A 'landscape and design summary' was subsequently submitted – alongside an updated Vision Document – in Autumn 2023, summarising the landscape-led approach to the proposed development.

We are aware that MDC has recently published its Regulation 18b Local Plan consultation document, which sets out its preferred approach to growth. This includes an updated Landscape Character Assessment (June 2024 - prepared by LUC) which establishes recommendations and guidance for any future development.

To support Catesby Estates' representations made in response to the current Local Plan consultation, LDA Design have reviewed the updated Landscape Character Assessment and considered how this relates to emerging development proposals.

## 2.0 The Site

The Site is located to the east of Gillingham, north-west of Rainham and north of Twydall.

The Site comprises four individual parcels of land, totalling approximately 30ha, separated by intervening roads and settlement.

The immediate context of the Site is characterised by small scale mixed farmland, with relatively intact hedgerows; paddocks; and dispersed settlement. Commercial orchards are characteristic of the land immediately east of the Site.

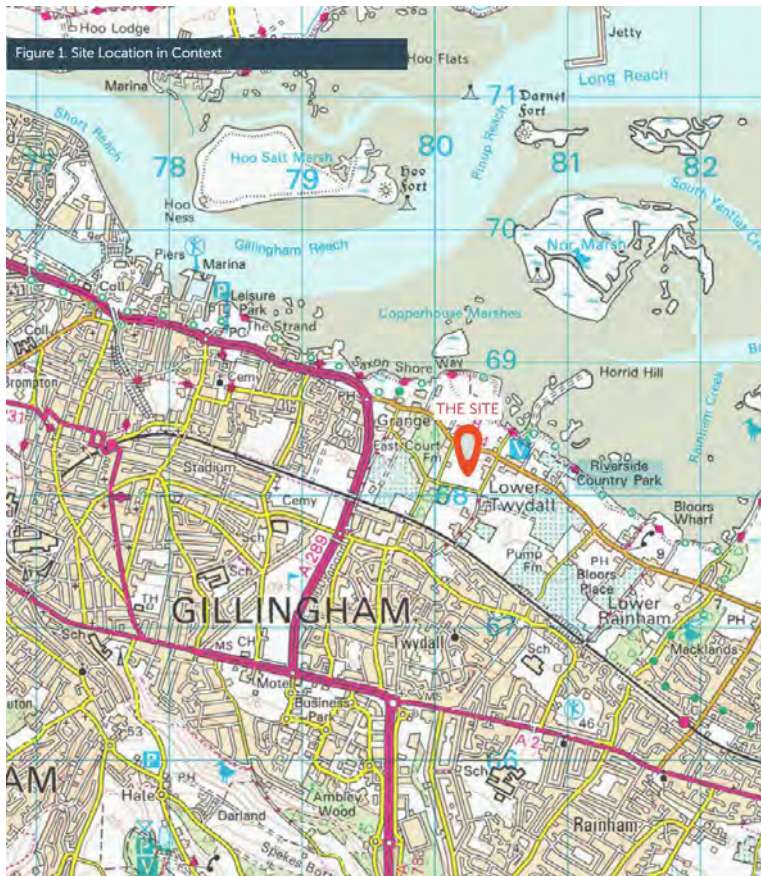
The small hamlet of Lower Twydall - focussed on Lower Twydall Lane - lies between the two main areas of the Site. Predominantly residential development lies along the northern boundary of Site off the Lower Rainham Road (B2004) and there are areas of further residential development including at Grange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

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

North of the B2004 the includes areas of mixed farmland; scattered residential development; and a boat yard, beyond which extend the intertidal marshes and mudflats fringing the River Medway. Land along the River Medway is forms part of the Riverside Country Park.

Site location plans – taken from the original Vision Document – are provided below:





### 3.0 Landscape Character Assessment

The Site is located within LCA E1: Lower Rainham as defined by the Landscape Character Assessment 2024.

The key characteristics are as follows:

- *“A low-lying, flat to gently undulating landform that rises gradually away from the adjacent marshes to the north.*
- *High quality soils support a variety of agricultural and horticultural land uses, including several orchards and arable farming, but also some pasture; it forms a small part of the distinctive area of ‘Fruit Belt’ landscape stretching east towards Faversham, strongly identifiable with the ‘Garden of England’.*
- *Small to medium scale field pattern defined predominantly by shelter belts and high hedges; some replacement with coniferous planting in places.*
- *A network of roads, narrow lanes, and tracks, which largely follow a north-south axis, running down towards the adjacent marshes; these intersect with east-west oriented Lower Rainham Road and the Chatham Main Line railway, resulting in a rectilinear pattern/grain.*
- *Settlement comprises scattered farmsteads and residential properties, with more concentrated settlement within the hamlets of Lower Rainham and Lower Twydall; to the east there is ribbon development along Lower Rainham Road, Berengrave Lane and Station Road.*
- *An over-riding rural character with open farmland and orchards interspersed with farm buildings and cottages, several of which are listed, and Conservation Area designations covering the historic parts of Lower Rainham and Lower Twydall; the rural character is undermined to the east and west due to urban fringe influences and a predominance of equine uses.*
- *A sense of enclosure as a result of the landform and shelter belts/hedges around orchards and along narrow lanes; views across the area are generally limited, albeit with some open views north towards the Medway Estuary around larger arable fields and/or where hedgerow loss has occurred (particularly in western areas between Lower Twydall and Ladds Corner).*
- *Two PRoW cross the area, and the narrow lanes and tracks are also well used by pedestrians, providing access to the landscape; the railway line and the A289 cause some severance and weaken links to/from the urban area to the south and west.”*

**Issues and Changes** – of most relevance to the Site context – include:

- *“Suburbanisation in the east, with recent expansion of the urban area into the landscape (such as development east of Bloors Lane Community Woodland and on Bloomfields east of Station Road).*
- *Threat of further expansion of urban edges from the south and west.*
- *Loss of traditional orchards and field patterns, due to abandonment or conversion to arable, pasture or equine uses.*
- *Replacement of traditional hedges/shelter belts with coniferous planting.*
- *Loss of distinctive settlement identity of Lower Rainham; ribbon development along Lower Rainham Road to the east of the hamlet is leading to a reduction in physical and perceived*



*separation between it and the urban area of Rainham (including the former separate hamlet of East Rainham).*

- *Lack of formal access to much of the landscape and severance and weakened links to/from the urban area to the south and west due to the presence of the Chatham Main Line railway and the A289.*
- *Gradual loss/erosion of the buffer between the urban area and the area of international and national importance for nature conservation along the Medway estuary and marshes to the north."*

**Landscape Management Guidance** – of most relevance to the Site context – include:

- *"Encourage the traditional farming practice and maintain and restore traditional orchards, retaining and enhancing the area's strong sense of place and associations of the Kent Fruit Belt; seek to connect and extend and manage to enhance biodiversity value.*
- *Conserve the traditional pattern and structure of the landscape by improving the continuity of hedgerows/shelter belts to enhance the rectilinear field pattern and to create an intact and connected network providing shelter from higher winds and shade; enhance and augment fragmented field boundaries with locally characteristic species, filling gaps where possible and replacing uncharacteristic coniferous planting and fencing.*
- *Improve connectivity and recreational use across the area and between it and the adjacent areas, including the urban area and the marshes and Saxon Shore Way to the north; consider the introduction of new formal PRoW between Lower Twydall and the Saxon Shore Way.*
- *Consider opportunities to increase the extent of deciduous woodland cover, using locally characteristic species to strengthen biodiversity and local distinctiveness, particularly around the urban area and other sub urbanising influences, using locally occurring species.*
- *Involve local communities in the management of orchards, particularly those connected to existing/new development, promoting local engagement and understanding."*

**Development Management Guidance** – of most relevance to the Site context – include:

- *"Conserve the local distinctiveness of historic buildings and hamlets and their rural setting, including Lower Rainham and Lower Twydall, by resisting inappropriate or unsympathetic development.*
- *Consider the role of this area as a green backdrop to the adjacent marshes, by resisting visually prominent development.*
- *Utilise existing roads and tracks for site access wherever possible; for any new roads and tracks, consider how these can fit in with the landscape character and complement the pattern of the existing roads.*
- *Integrate new development, through the use of native shelter belts, hedgerows and woodlands.*
- *Avoid large scale urban/housing extensions within this working rural agricultural landscape characterised by its low-density dispersed settlement pattern.*

- *Avoid linear coalescence of development along roads, maintaining distinctive settlement identity, particularly between the hamlet of Lower Rainham and the urban area of Rainham to the east.*
- *Conserve the rural character in central areas and consider the rural setting of Lower Rainham and Lower Twydall, scattered listed farm buildings and Riverside Country Park."*

The overall Landscape Strategy for the Lower Rainham Farmland is to conserve and enhance the rural character of this intensively farmed area, including the setting of rural Conservation Areas at Lower Rainham and Lower Twydall; provide better functional connections for people and nature with the adjacent marshes; and strengthen the rectilinear pattern/grain of the landscape through reinforcing hedgerow / shelter belt boundaries.



## 4.0 Landscape Commentary

LDA Design broadly agree with the appraisal of key characteristics and guidance for landscape and development management. However, it is considered that the Landscape Character Assessment 'underplays' the fragmented nature of the landscape, comprising a mix of arable land, orchards, grazing, and neglected parcels of land and overall poor condition of some areas. This was highlighted by the earlier Medway Landscape Character Assessment (2011) and verified through independent field study.

In particular the Landscape Character Assessment highlights the presence of orchards within the landscape and makes reference to the 'fruit belt' character. While it is considered that commercial orchards are a characteristic feature of the wider landscape, orchards are predominantly located to the east of the Site / character area, with the Site and land to the west containing more 'urban fringe' land uses and more heavily influenced by the surrounding settlement areas.

Overall, any new development within the Lower Rainham Farmland has the potential to impact on the dispersed settlement pattern and rural character of the landscape, and needs to be carefully considered to successfully integrate into the prevailing landscape context.

LDA Design consider that an opportunity exists to create a sensitive masterplan for a new 'neighbourhood' within the Lower Rainham area that works within the existing landscape framework and provides landscape enhancement; open space provision; and new recreational routes.

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

The development proposals for the Site would adhere with following principles to create a 'landscape-led' masterplan that adheres to the guidance set out within the newly published Landscape Character Assessment:

- Appropriate scale and extent of development that reflects the dispersed settlement pattern and follows the south-west to north-east orientation of lanes and fields.
- Development configuration and vernacular that reflects the character of the local villages rather than adjacent urban areas.
- Retention and enhancement of boundary vegetation and appropriate development offsets from adjacent roads to retain landscape structure and integrate the development into the landscape.
- New planting within the proposed development to create an attractive setting and further help integrate new buildings into the landscape.
- Landscape buffer containing productive orchards and public open space to limit adverse effects on the setting of the Lower Twydall Conservation Area.

- Retention and offset to Grange Road, which is designated as a Rural Lane. There is also potential to enhance the rural qualities, amenity, and biodiversity value of other 'lanes' adjacent to the Site by diverting vehicular traffic into the development.
- Creation of an extensive, well connected, and multi-functional network of public open spaces and areas for wildlife, including connections to the Riverside Country Park.
- New spaces and routes could be considered as an extension to the Riverside Country Park, alleviating existing visitor pressure and – through better pedestrian and cycle connectivity – minimising the need to access the County Park via car.
- Areas of public open space and routes to include appropriate signage, including interpretation of any important landscape and heritage features.
- Proactive management and maintenance of public open spaces and landscape features such as hedgerows and community orchards to maintain the long-term amenity and biodiversity interest.

The comprehensive landscape strategy also would protect the role of the landscape as a 'green buffer' separating the built-up areas of Twydall and Rainham from the Medway Estuary – albeit one that is already characterised by clusters of built development. This would also ensure that the area continues to perform a role as a green back drop in views from the Medway.

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





Figure 1: Existing context

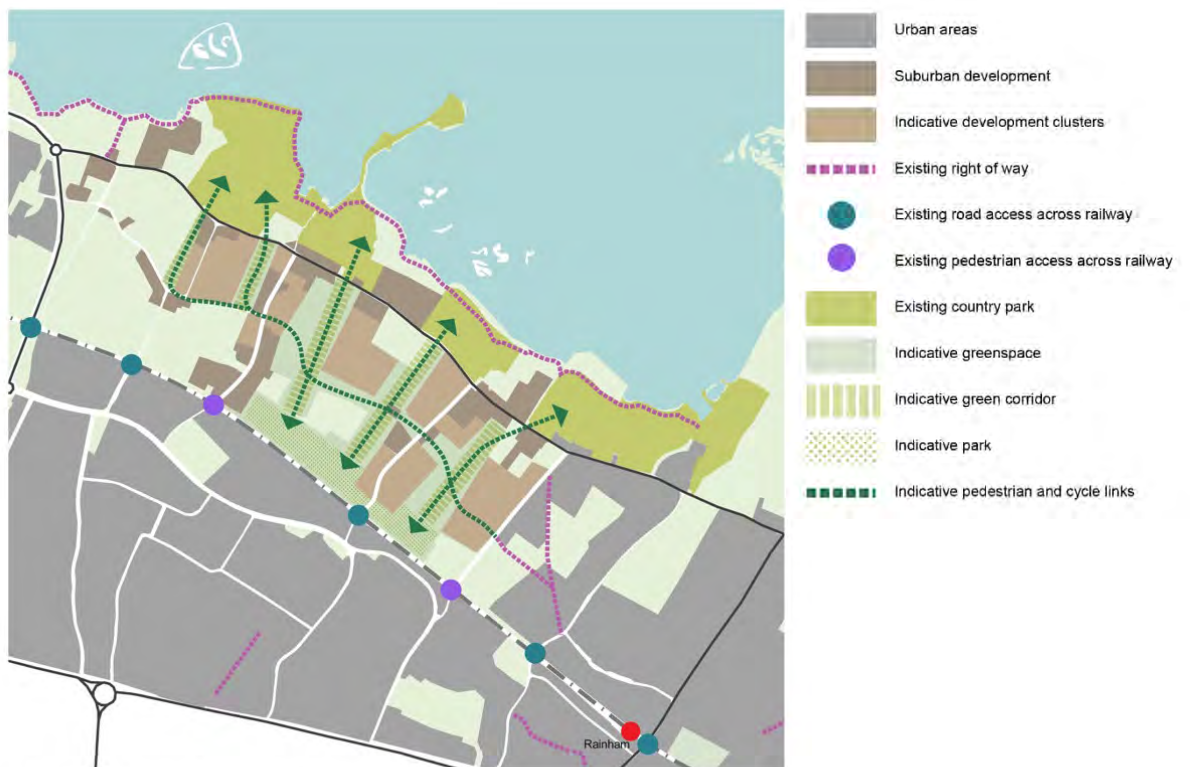


Figure 2: Indicative landscape-led development concept

## 5.0 Conclusion and Next Steps

Based on this initial review, it is considered that the Site represents an potential location for a new neighbourhood; any proposed development could be well integrated into the landscape; and a landscape-led concept is capable of supporting the recommendations and guidance of the recently published LCA.

Catesby Estates and LDA Design would welcome the opportunity to work closely with MDC (and other stakeholders) to further develop the proposals for the Site.



# Draft Medway Local Plan Regulation 18b Consultation

Land South of Lower Rainham Road, Gillingham

---



---

## Appendix C Transport Technical Note (August 2024).

---

**Job Name:** Land to the South of Lower Rainham Road, Medway

**Job No:** 332610765

**Date:** 22<sup>nd</sup> August 2024

**Prepared By:** H Wenman

**Reviewed By:** J Williams

**Subject:** Regulation 18b Medway Local Plan

---

## 1. Introduction and Context

- 1.1. Stantec has been appointed by Catesby Strategic Land Ltd to provide supporting transport/accessibility representations to the Regulation 18b Medway Local Plan consultation for a potential residential development of up to 400 residential dwellings (and possible primary school) on land south of Lower Rainham Road, Gillingham, Medway, Kent.
- 1.2. A Call for Sites document was submitted in October 2023 seeking an allocation for the site in the draft Local Plan. Regulation 18b of the Medway Local Plan, published in July 2024, excludes Land to the South of Lower Rainham Road.
- 1.3. This Technical Note reviews the Strategic Transport Assessment (STA) Forecast Report provided as part of the evidence base for the draft Local Plan, and sets out why Land South of Lower Rainham Road should be included as an additional allocation in the draft Medway Local Plan, with reference to the technical information available.
- 1.4. This justification is based on a high-level distribution exercise based on Census 2011 data (in the absence of any more recent available information) and analysis of junction capacities on key routes from the site. Notwithstanding the forecast impact on junction capacity, the site is considered to be located in a sustainable location, as set out in earlier representations made for this site.

## 2. Site and Surrounding Context

- 2.1. The site is located on land to the south of Lower Rainham Road, to the south-east of Gillingham and north-west of Rainham, within Medway (Unitary Authority), in Kent. The site is currently in agricultural / horse grazing use.
- 2.2. The location of the site is shown in Figure 1.





Figure 1: Site Location

### 3. Distribution Exercise

- 3.1. Census 2011 data for journeys to work (WF01BEW - Location of usual residence and place of work (OA level) has been used to complete a high-level trip distribution exercise.
- 3.2. The location of usual residence was set at Middle Super Output Area (MSOA Medway 023 – shown below) as this is the MSAO the site is located within, and the place of work was set at MSAO level for Medway and at Local Authority level for the rest of the country. The routing of traffic was established using Google Maps journey time planner with the travel time set to the evening peak hour.

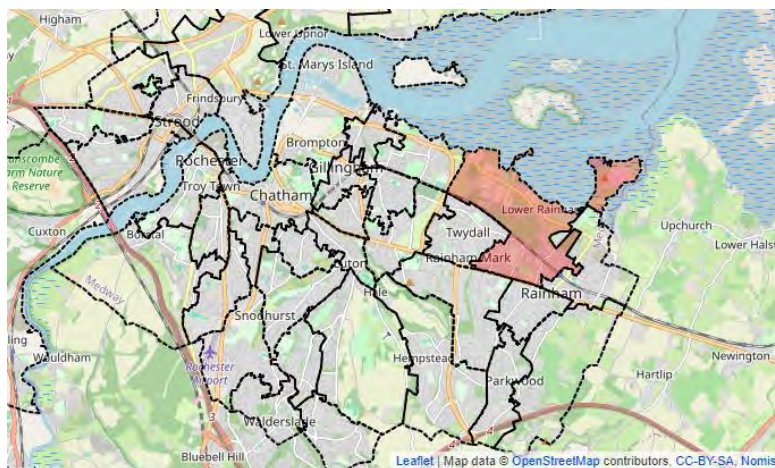


Figure 2: MSAO Location – Medway 023

- 3.3. The resultant distribution of vehicle trips is shown below in Table 1.

Table 1: Distribution (by Route)

Route	Distribution (%)
M2 Junction 4 WB (via Ito Way and Hoath Way)	21%
M2 Junction 4 WB (via Ito Way and Hoath Way)	1%
Gillingham South (via Pier Road and Church Street)	7%
Gillingham North (via Pier Road)	11%
Rainham (via Lower Rainham Road and Station Road) – including Train Station trips	21%*
A2 WB towards Chatham, Rochester etc (via Ito Way)	10%
A2 EB towards Swale (via Lower Rain Road and Otterham Quay Lane	10%
Towards Strood, Hoo etc (via Pier Road)	8%
Twydall (via Pump Lane)	3%
Hempstead including Gillingham Business Park (via Hoath Way)	6%
Total	100%

\* This assumes that all people travelling to London drive to Rainham railway station to catch the train

- 3.4. The vehicle trip distribution generated above demonstrates that people living in MSOA Medway 023 generally work locally in Medway or travel to London with around 46% working in Medway and around 21% traveling to Rainham to work in Rainham or commute via train to London. Only 22% are routing towards M2 Junction 4 to travel further afield using the highway network. It is assumed this trend would be replicated at the Proposed Development.
- 3.5. When the above is consolidated to understand the distribution of trips on key roads surrounding the site, the distribution (%) in Table 3 is derived.
- 3.6. Table 3 also demonstrates the likely two-way trip generation in accordance with the distribution. At a high-level, an urban area such as Medway is likely to see a worst-case two-way residential vehicle trip rate of around 0.5 trips per dwellings in the peak hours. For 400 dwellings, this would equate to approximately 200 two-way vehicle trips. When 200 vehicle trips are applied to the distribution (%), the vehicle trip generation per road is as per Table 3 below (Distribution (two-way flows)).



Table 2: Trip Generation and Distribution per Road

Road	Distribution (%)*	Distribution (two-way flows)*
Lower Rainham Road (West of site)	65%	131
Lower Rainham Road (East of site)	35%	69
Ito Way/Yokosuka Way	38%	76
Hoath Way	32%	64
Pier Road	27%	55
Station Road (Rainham)	21%	42
M2 Junction 4 WB	21%	41
A2 EB	10%	21
A2 WB	10%	20
Church Road	7%	15
Pump Lane	3%	6
M2 Junction 4 EB	1%	3

\*Figures don't add up to 100% as trips travel multiple roads, as part of their route

3.7. This is illustrated graphically in Figure 3 below.

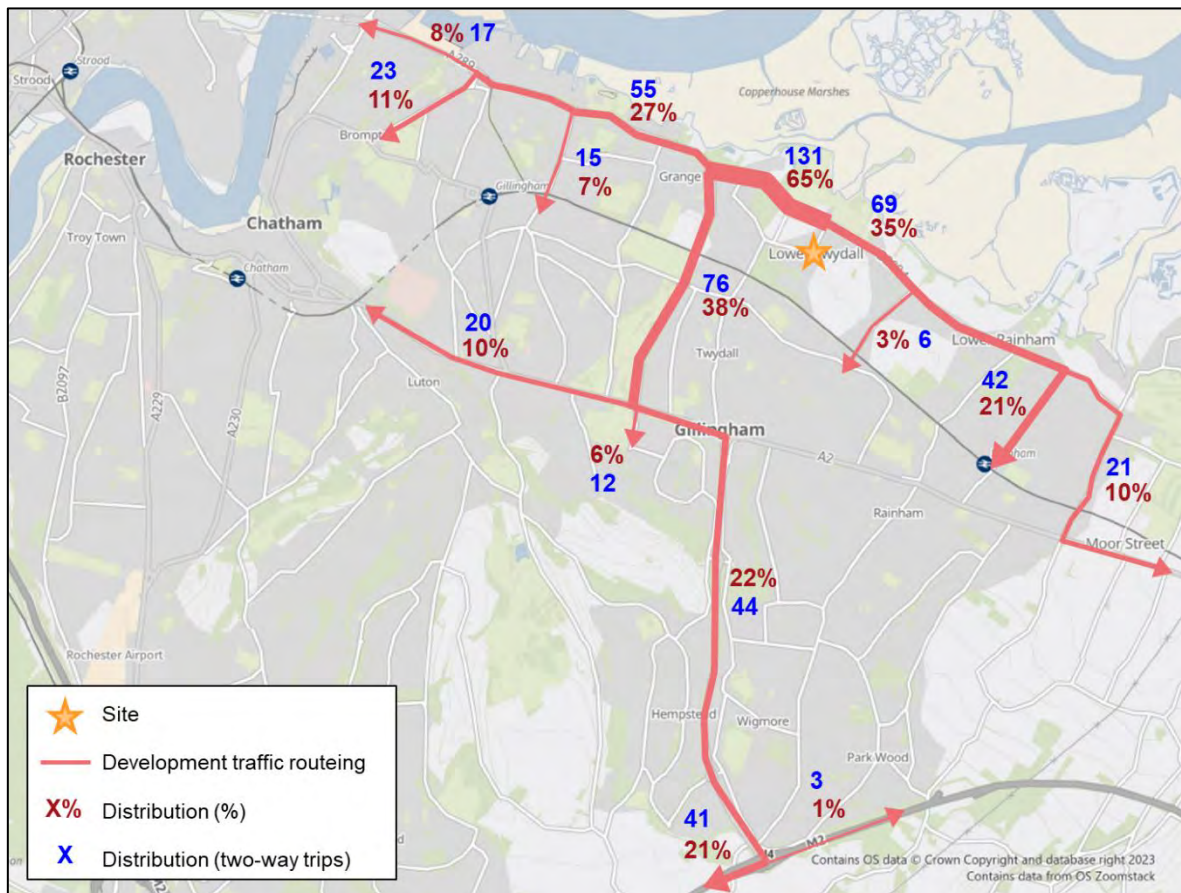


Figure 3: Distribution

- 3.8. The above exercise demonstrates that traffic would route via many different routes to reach their destinations – diluting the impact of the scheme.

## 4. Review of Strategic Transport Assessment Forecast Report

- 4.1. To assess the possible highway impacts of the emerging Medway Local Plan, Jacobs were commissioned by Medway Council (MC) to develop the Medway Transport Model (MTM) which is a strategic model using the software VISUM. The MTM is based on an existing cordon of the Kent Transport Model (KTM).
- 4.2. Four model scenarios have been developed. These are as follows:
- **2041 Reference Case (RC)** – this includes completions, consented development, and infrastructure committed or planned up to 2041 in Medway. It also includes 'near certain' developments for adjoining authorities and TEMPro background growth.
  - **2041 Reference Case with Lower Thames Crossing (RC with LTC)** – a sensitivity test to understand the potential impact of LTC on the RC.
  - **2041 Do Something (DS)** – this builds on the RC with the inclusion of proposed Local Plan allocations and associated infrastructure.
  - **2041 Do Something with Lower Thames Crossing (DS with LTC)** – a sensitivity test to understand the potential impact of LTC on the DS.
- 4.3. This Note focuses mainly on the RC and DS and does not look in any detail at the RC with LTC or the DS with LTC – given there is no current certainty regarding this scheme.
- 4.4. Junction and link capacity has been assessed in the Strategic Transport Assessment with reference to Level of Service (LoS) and Volume over Capacity (V/C).
- 4.5. LoS is based on mean delay experienced by each vehicle and is categorised from A-F. The description for each categorisation of LoS, as set out in the Strategic Transport Assessment, is provided below in
- 4.6. Table 3.

Table 3: LoS Level Description

LoS Level	Description
<b>A</b>	Level A represents the best quality of traffic where the driver has the freedom to drive with free flow speed.
<b>B</b>	Level B represents good traffic quality where driver can reasonably maintain free flow speed and manoeuvrability within the traffic stream is slightly restricted.
<b>C</b>	Level C represents stable traffic flows, at or near free flow. Ability to manoeuvre through lanes is noticeably restricted and requires awareness.
<b>D</b>	Level D represents almost unstable traffic flows. Speeds slightly decrease as traffic volume slightly increase. On this level driver comfort decreases.
<b>E</b>	Level E represents unstable traffic flows, operating at capacity. Driver's level of comfort becomes poor.
<b>F</b>	Level F represents the worst traffic quality with forced or breakdown traffic flows. Travel time cannot be predicted, with generally more demand than capacity.



4.7. V/C considers the volume of vehicles on a link/turn and divides it by the capacity. The different V/C thresholds, as set out in the Strategic Transport Assessment are summarised below in

4.8. Table 4.

*Table 4: V/C Assessment Criteria*

Threshold	Impact Assessment
V/C <75	Operating within capacity
75 <= V/C <85	Operating within capacity but approaching 85%
85 <= V/C <100	Operating close to capacity
V/C >= 100	Over capacity

4.9. The junctions where LoS deteriorates between RC and DS in the vicinity of the proposed site are set out below. These all occur in the AM peak hour. There are no junctions of interest that are shown to deteriorate in the PM peak hour.

- 1. Maritime Way / A289 Pier Road Westbound - changes from a level C in the RC to a level D in the DS, although it is noted that it is already a D in the base (observed year). The junction performance is therefore no worse than existing.
- 2. Lower Rainham Road east of Pump Lane / Cowstead Lane - changes from a level D in the RC to a level E in the DS. However, the majority of site traffic is expected to route west on Lower Rainham Road, therefore having a minimal impact to the east. There would also be potential opportunities for the Proposed Development to help improve level of service in this area.
- 3. B2004 Lower Rainham Road / Berengrave Lane - changes from a level C in the RC to a level D in the DS. However, the majority of site traffic is expected to route west on Lower Rainham Road, therefore having a minimal impact on this junction.

4.10. The location of these junctions/links relative to the likely distribution of traffic from the proposed site is shown in Figure 4 and Figure 5 below for the AM and PM peak hours respectively. The colour of the junction/link represents the LoS in the DS.

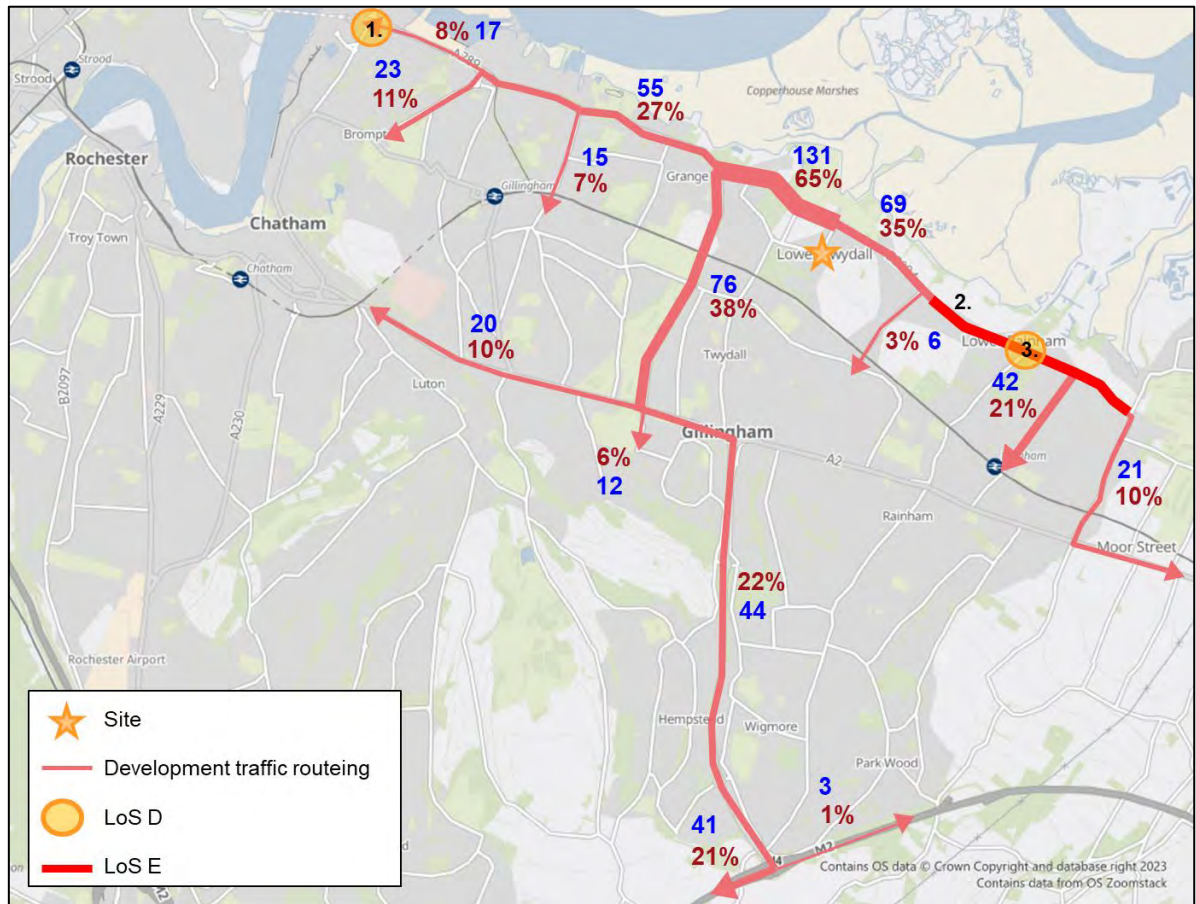


Figure 4: Distribution Comparison to LoS Review (AM Peak Hour)



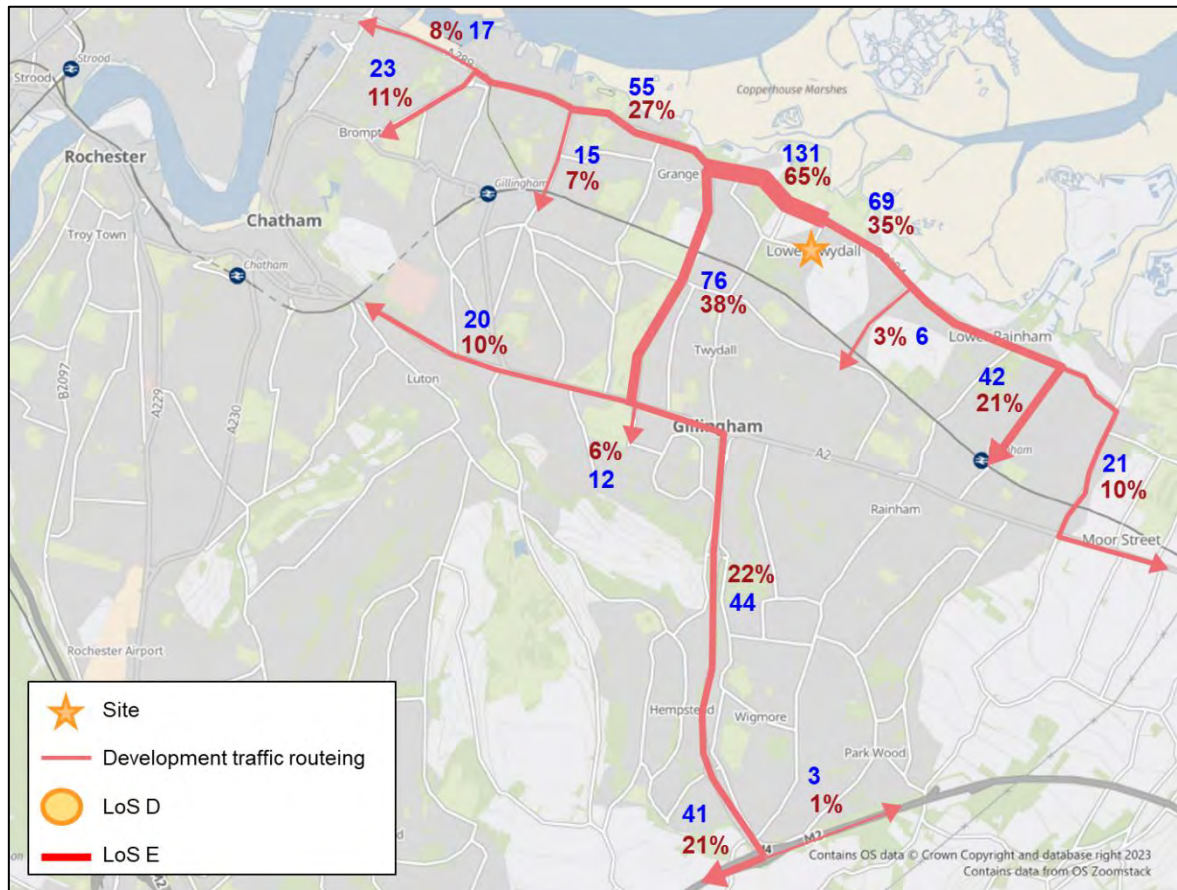


Figure 5: Distribution Comparison to LoS Review (PM Peak Hour) – Note – No LOS capacity constraints

4.11. In terms of Junction V/C changes between the RC and DS scenarios – forecast changes at junctions relevant to the Proposed Development and trip distribution are reviewed below with reference to location plans provided after this text:

- 1. Maritime Way Northbound / A289 Pier Road Roundabout - this has a V/C of 72% and 94% respectively in the AM and PM peaks in the RC, which increases to 91% and 96% respectively. This junction is a key junction development traffic would route through heading west and it is shown to have some spare capacity. Only 17 development trips would be anticipated to route this junction therefore any impact would be minimal.
- 2. Pier Road/ Gillingham Gate Road Gyratory - this has a V/C of 76% and 99% respectively in the AM and PM peaks in the RC, which increases to 100% and 100% respectively. The Proposed Development could generate an additional 40 trips through this junction, and may present opportunities to enhance this junction capacity.
- 3. Church Street / The Strand Roundabout - this has a V/C of 88% and 97% respectively in the AM and PM peaks in the RC, which decreases to 74% and 87% respectively due to reassignment. This junction is a key junction that would be used to access the Proposed Development and it sees a notable increase in V/C between the RC and DS, meaning the junction has some spare capacity.
- 4. B2004 Lower Rainham Road / Grange Roundabout – this has a V/C of 76% and 66% respectively in the AM and PM peaks in the RC, which increases to 88% and 81% respectively. This junction is a key junction that would be used to access the proposed site and with the inclusion of the LP, this junction is shown to have spare capacity.

- 5. Cornwallis Avenue / Cornwallis Roundabout – this has a V/C of 59% and 79% respectively in the AM and PM peaks in the RC, which increases to 70% and 90% respectively. This junction is a key junction development traffic would route through heading south towards the A2 and M2 and it is shown to have some spare capacity.
  - 6. A2 Sovereign Boulevard / Will Adams Roundabout - this has a V/C of 88% and 84% respectively in the AM and PM peaks in the RC, which increases to 96% and 93% respectively. This junction is a key junction development traffic would route through heading south towards the A2 and M2 and it is shown to have some spare capacity.
  - 7. Hoath Way / Bowaters Roundabout – this has a V/C of 85% and 88% respectively in the AM and PM peaks in the RC, which increases to 90% and 92% respectively in the DS. With the inclusion of the LP, this junction is still shown to have some spare capacity.
  - 8. A278 Hoath Way / A278 Hoath Way Roundabout - this has a V/C of 79% and 96% respectively in the AM and PM peaks in the RC, which increases to 85% and 95% respectively. This junction is a key junction development traffic would route through the access the strategic highway network and it is shown to have some spare capacity.
  - 9. A278 Hoath Way / Gillingham Interchange - this has a V/C of 82% and 42% respectively in the AM and PM peaks in the RC, which increases to 86% and 59% respectively. This junction would be the main junction used to access the strategic highway network from the proposed site and is still shown to have spare capacity.
  - 10. High Street/ Moor Street/ Otterham Quay Lane/ Meresborough Rd Signalised Junction - this has a V/C of 85% and 84% respectively in the AM and PM peaks in the RC, which increases to 88% and 84% respectively. This is a key junction for development traffic heading east towards Swale and is shown to have some spare capacity.
  - 11. Lower Rainham Road – this has a V/C of 80% and 78% respectively in the AM and PM peaks in the RC, which increases to 93% and 82% respectively. This is a key link as it is the road the proposed site is located on and it is shown to have some spare capacity.
- 4.12. The location of these junctions relative to the likely distribution of traffic from the proposed site is shown in Figure 6 below. This figure also demonstrates their capacity in the DS scenario.



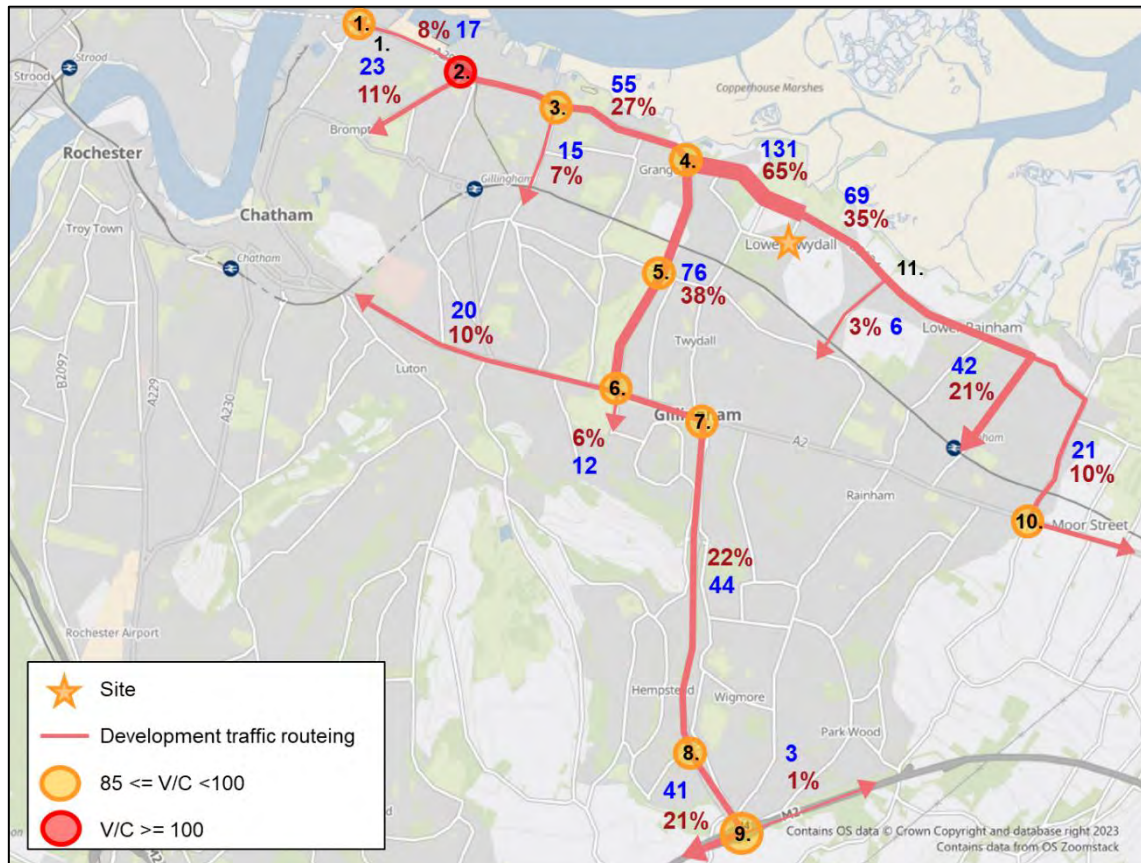


Figure 6: Distribution Comparison to V/C Review – Worst Case AM / PM

4.13. Other observations noted within the report are as follows:

- The flow difference between the DS and RC in both the AM and PM peak hours shows a relatively small uplift in flows on Lower Rainham Road and other roads within the vicinity of the proposed site. This suggests there is not any major committed development in this area, meaning there appears to be the opportunity for a development to come forward in this locality.
- The queue length difference between the DS and RC in both the AM and PM peak hours does not show there to be any significant increases in queueing on any of the major roads that development traffic is likely to route via. This suggests there could be further capacity for a further Local Plan development at Lower Rainham Road.

## 5. Summary and Conclusion

- 5.1. This Note has set out the likely distribution of traffic from the Proposed Development and reviewed the Modelling Forecast Report prepared to support the draft Medway Local Plan.
- 5.2. From the review of the Modelling Forecast Report, it can be concluded that although many of the key junctions that the development traffic is likely to route through are operating close to capacity, they are mostly operating within capacity and spare capacity is available.
- 5.3. Due to the location of the site, there will be many different routes that residents would use to reach their destinations, meaning the overall traffic impact of the development is likely to be diluted. Therefore, the Proposed Development at Land South of Lower Rainham Road should be considered as an excellent candidate for allocation in the Local Plan.







LOCAL PLAN TEAM  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent  
ME4 4TR

Your ref: Reg 18b Consultation  
Our ref: Chattenden Barracks, Homes  
England  
6 September 2024

Sent by Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)

Dear Sir/Madam,

**Medway Council - Regulation 18(b) Local Plan 2041 Consultation – Chattenden Barracks, Chattenden**

These representations have been prepared by WSP on behalf of Homes England in response to Medway Council's Regulation 18 (b) Local Plan 2041 Consultation and relate to Homes England's interest in the future of Chattenden Barracks. In addition, separate representations are also being made in relation to Lodge Hill Camp.

**Introduction**

Homes England is an executive non-departmental public body, sponsored by the MHCLG, and the governments' Housing and Regeneration Agency. Homes England has the aspiration, influence, expertise and resource to drive positive market change. By releasing more land to developers who want to make homes happen, Homes England assists in the delivery of the new homes England needs and helps to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share its ambition, including local authorities, private developers, housing associations, lenders and infrastructure providers.

As set out in Homes England's Strategic Plan 2023-28, its mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice cross England and the creation of places people are proud to call home.

A key focus for Homes England is the quality of what is being delivered, including championing environmental sustainability, design and beauty in homes and places that they support to create distinctive places and spaces that are designed for people to use and thrive.

This former defence land at Lodge Hill, including the part of the site known as Chattenden Barracks has been in various military uses for over 140 years. The Lodge Hill estate was transferred to Homes England from the MOD in early 2018. The location of the Chattenden Barracks site is shown on the Plan in **Appendix 1**.

**Purpose of Representations**

Pursuant to Regulation 18 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 these representations are made in respect of the Draft Medway Local Plan 2041

published in July 2024 (herein referred to as the 'Reg.18 (b) Local Plan') to confirm Homes England's position in respect of its land interests at Chattenden Barracks.

An overview of Homes England's key site-specific representations is set out in this letter which is accompanied by a detailed review of the consultation material in the attached schedule (**Appendix 2 - Full Representations to the Medway Local Plan 2041 Regulation 18 and Appendices**). These representations have sought to answer the questions posed by Medway Council, where relevant, as well as providing comments relating to individual policies and appended evidence base documents. In addition, all of these comments have been uploaded individually through the Medway online consultation portal.

### **Support for the Plan Making Process**

These representations have specific regard to NPPF paragraph 15 December 2023 (and 'Draft text for consultation' July 2024 paragraph 16) in relation to Government's local plan making requirements and the tests for soundness as set out in further detail in this letter. Homes England is supportive of Medway Council progressing their new Local Plan to Adoption and therefore is setting out suggestions in these Representations to help ensure that the Plan is as sound as possible for when it is examined by the Inspector. The Plan needs to be prepared in accordance with legal and procedural requirements to ensure that it is positively prepared, justified, effective and consistent with national policy (test of soundness Examining Plans, NPPF Paragraph 35 (Paragraph 36 NPPF 'Draft text for consultation' (July 2024)). Homes England's comments are made in order to assist with the Plan-Making process, noting the publication of the draft NPPF was post publication of the Reg. 18(b) Local Plan. As such, in preparing these representations, the Medway Local Plan 2041 Regulation 18 (b) - July 2024 and accompanying appendices have been considered.

### **Background**

Homes England is the freehold owner of the Lodge Hill estate, the entire landholding as shown on the accompanying plan (**Appendix 1**) extends to around 325 hectares and comprises significant land parcels including Chattenden Barracks, Lodge Hill Camp, the former Military Training Area, and other parcels of land sitting in and around the Chattenden Woods and Lodge Hill SSSI.

These representations seek to ensure that development opportunities at Chattenden Barracks make a positive contribution, not only to meeting the development needs of the immediate Chattenden community, but also that they can add vibrancy and success to the wider Hoo Peninsula.

Working with a range of delivery partners, it is Homes England's intention to progress the proposals for the Chattenden Barracks parcel to ultimately secure a beneficial planning position, accelerating the delivery of key infrastructure (where required), facilitating housing delivery in an efficient and effective manner, achieving high standards of design and sustainability across the scheme as well as delivering significant social, economic and environmental benefits to the existing communities.

Homes England is promoting land at Chattenden Barracks for a residential-led scheme of up to 500 new homes. The site was submitted to the Medway Call for Sites Submission in February 2023 and to the Medway Land Availability Assessment in October 2023 (Chattenden Barracks). Homes England has also made representations as part of Medway Council's Local Plan (2041) preparation process, with the most recent representations being made to the Regulation 18 Consultation stage in October 2023.



A draft Vision Document incorporating early opportunities / constraints thinking and an initial vision for both the Chattenden Barracks and Lodge Hill Camp parcels commenced preparation in 2023, drawing on the available evidence base at the time. The draft Vision Document is the starting point for the proposals that will be developed further with community and key stakeholder engagement.

### **Medway's Strategic Growth Options**

Medway Council's preferred Option, SGO 3, blends regeneration, brownfield and greenfield development. Homes England broadly supports the overall assessment methodology of the Spatial Growth Options that has been undertaken with some further detailed comments provided in **Appendix 2 - Full Representations to the Medway Local Plan 2041 Regulation 18 and Appendices.**

Homes England supports the 'brownfield first' approach taken by Medway Council as Chattenden Barracks is a previously developed, brownfield site. The parcel is in a sustainable, rural location and represents a key opportunity to make efficient use of land and will assist Medway in meeting its development needs whilst also making a positive contribution to the vibrancy and sustainability of Chattenden and the wider Hoo Peninsula. The overall aims and objectives of the draft Reg 18(b) Local Plan are broadly supported as these align with the objectives found in Homes England's Strategic Plan (2023 to 2028).

Homes England welcomes the continued support of the Chattenden Barracks site (Indicative Preferred Site HHH3) as a strategic development site suitable for residential-led development with a housing capacity of 500 homes.

### **Deliverability in line with the NPPF**

The NPPF requires local authorities to prepare local planning policies that are aspirational but deliverable. In relation to "identifying land for homes", NPPF Paragraph 69 (Paragraph 70, NPPF 'draft text for consultation' (July 2024)) states that:

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

For a site to be considered deliverable for housing it:

*"Should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years..."* (NPPF Annex 2: Glossary: 'Deliverable')

The above criteria have been used to consider the proposals for the Chattenden Barracks Site.

These are outlined below:

#### Available now:

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

#### Suitable for development:

In determining that the site is suitable for redevelopment, a number of factors have been considered, including Medway's growth strategy, the optimal use of the site and site-specific influences.

Key to the successful reuse of this previously developed land is ensuring flexibility in the planning policies to ensure it is brought back into effective use. As acknowledged in the Interim SA, this land is suitable for 500 new homes. In line with the NPPF Paragraph 122 ('Draft text for consultation' Paragraph 121), the brownfield nature of the site significantly contributes to its suitability for redevelopment:

*"Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land"*

Furthermore, Homes England has undertaken a significant amount of environmental work and initial technical work that informs the suitability of the site for development. This work is comprehensive covering ground conditions, ecology, transport, drainage, heritage, and a level of initial assessment of land contamination (in particular relating to ordnance) concluding that there are no overriding constraints to development and that the site is suitable for the proposed use. Whilst these matters will influence the design of future development proposals, they do not impact the suitability for proposed development.

#### Achievable:

Work undertaken to date demonstrates that the delivery of new homes at Chattenden Barracks is achievable with a realistic prospect that new homes will be delivered on the site in just over five years.

Homes England supports and accelerates the delivery of housing-led projects. The Agency has expertise and a track record in unlocking and delivering complex development sites, delivering infrastructure early and accelerating the provision of new homes working with a variety of delivery partners. This provides greater control on pace of delivery, quality of new homes and innovative building technologies.

Medway Council is facing challenging housing delivery targets. Planning policy requires that there is a step change in delivery and the emerging Local Plan will be the principal vehicle to deliver this radical change. Homes England, as the Government's Housing and Regeneration Agency, is seeking to develop up to 500 homes on Chattenden Barracks, including much needed affordable homes. This would make a material contribution to meeting the local housing need.

#### **Conclusions**

Homes England is supportive of the progress made since the previous Regulation 18 consultation (2023) including the Council's Vision, strategic objectives and overarching growth strategy. In addition, Homes England welcomes the inclusion of the Chattenden Barracks site a 'selected site' 'Indicative Preferred Sites – Residential-led' for 500 homes and is supportive of the blended strategy for sustainable growth (SGO3). In particular, Homes England agrees with the brownfield first approach, as there is significant land of this type for potential development for homes, jobs and services on the Hoo Peninsula.

Chattenden Barracks is a brownfield site on previously developed land that is available, suitable and achievable, making it deliverable for development, making an important contribution to Medway's growth strategy. There is considerable opportunity to provide a well-designed, high-quality, and sustainable development that minimises the impact on the local environment.





The full representations contained in **Appendix 2** seek to provide targeted comments, focusing on a small number of suggested clarifications and amendments considered necessary to ensure that the Reg 18 (b) Local Plan and the specific policies supporting the delivery of Medway's aspirations for growth are effective, consistent with national policy and support the Plan's timely delivery.

Homes England look forward to continuing dialogue with Medway Council and playing a role in shaping the Local Plan at future stages of the plan-making process, through to Adoption.

If you require any further information, please contact [beth.wells@wsp.com](mailto:beth.wells@wsp.com) or the undersigned.

Yours faithfully,



Amy Jefferies MTCP MA UD MRTPI  
Planning Director

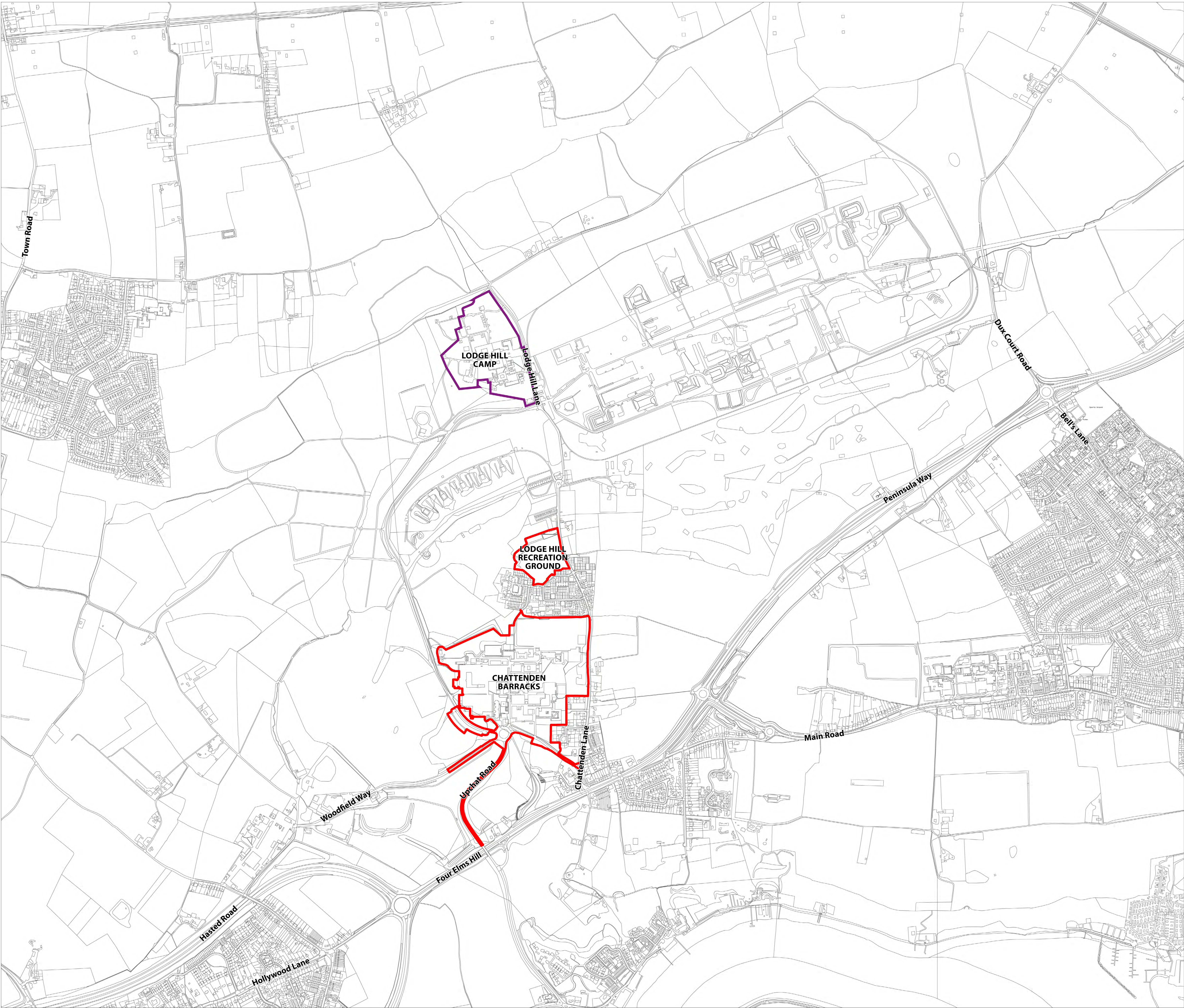


#### **Appendices :**

Appendix 1 - Location and Ownership Plan

Appendix 2 – Full Representations to the Medway Local Plan 2041 Regulation 18 and Appendices





**Key**

— Chattenden Barracks site (25.34 Ha)

— Lodge Hill Camp site (9.40 Ha)

Rev	Date	Description
F	29/04/24	Labelling added
G	29/09/24	Place labels added

Drawn	Old	Rev	Date	Description
DS	CI	.	15/06/22	Drawing first issue
FV	CI	A	11/07/22	Update to drawing
AS	CI	B	13/01/23	Change colour of Lodge Hill Camp boundary
FV	MQ	C	18/01/23	Addition of Lodge Hill Camp boundary
FV	MQ	D	18/01/23	Addition of site areas
FV	MQ	E	28/02/23	Removal of DRAFT watermark

Drawn	Old	Drawn	AS
FV	FV	Checked	FV
AS	CI	Date	15/06/22
FV	MQ	Scale @ A0	1:5000
FV	MQ		
JS	MQ		



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
		Representation Introduction - Chattenden Barracks				
2649						<p>WSP UK Ltd (WSP) has been instructed by Homes England to submit Representations to the Regulation 18(b) Medway Local Plan and appendices in relation to its land at Chattenden Barracks and Lodge Hill Camp, Lodge Hill. Separate representations are made in relation to each of these two sites. This document relates to Chattenden Barracks.</p> <p>Homes England is the Government’s housing and regeneration agency. Its mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. These objectives support greater social justice; the levelling up of communities across England and the creation of places people are proud to call their home. Homes England’s mission is underpinned by a number of strategic objectives that are outlined in its Strategic Plan (2023 – 2028) (link: <a href="https://www.gov.uk/government/publications/homes-england-strategic-plan-2023-to-2028">https://www.gov.uk/government/publications/homes-england-strategic-plan-2023-to-2028</a>).</p> <p>Homes England is the freehold owner of 325ha of the Lodge Hill estate. These representations seek to ensure that Homes England’s land, including development opportunities at Chattenden Barracks, make a positive contribution, not only to meeting the development needs of the area but also the vibrancy and success of the wider place. In line with the NPPF Paragraph 122 (‘Draft text for consultation’ paragraph 121), the brownfield, ‘previously-developed’ nature of the sites significantly contribute to their suitability for redevelopment, making efficient use of land.</p> <p>The location of the Chattenden Barracks site is shown on the accompanying plan in Appendix 1. This land at Chattenden Barracks is being promoted by Homes England for a residential-led scheme. The site was previously submitted to the Medway Call for Sites Submission in February 2023 and to the Medway Land Availability Assessment in October 2023 (Ref: Chattenden Barracks – HHH3). Homes England has also made representations as part of Medway Council’s Local Plan (2041) preparation process, with the most recent representations being made to the Regulation 18 Consultation stage in October 2023.</p> <p>A draft Vision Document was prepared incorporating both Chattenden Barracks and Lodge Hill Camp in 2023. This document set out Homes England’s initial vision for the sites, drawing on the available evidence base at the time. It sets out details of the emerging proposals for both Chattenden Barracks and Lodge Hill Camp in order to demonstrate that there are no overriding constraints to development. It confirms that the proposals are robust and deliverable taking into account the availability of the land, its suitability and the likely economic viability of the proposals. The draft Vision Document is the starting point for the proposals that will be developed further, in collaboration with the local community and through key / statutory stakeholder engagement.</p> <p><b>Chattenden Barracks</b></p> <p>The site is located between Lochat Road to the south and west, Kitchener Road to the south and Chattenden Lane to the east. The site includes a small area of (linked) hardstanding to the southwest of Lochat Road and the former Recreation Ground north of Chattenden Estate. The site area is 25.34ha and forms land constituting the former Chattenden Barracks that were occupied from the 1870’s to the 1980’s after which the buildings (with the exception of a single structure) were removed.</p> <p>Homes England sees the land at Chattenden Barracks as an important opportunity to bring forward much needed new homes on a brownfield site on the Hoo Peninsula. The agency is keen to assist in contributing to new housing provision in Medway whilst positively facilitating design and amenity enhancements and protecting ecological assets in Chattenden, specifically ensuring the long-term resilience of the Chattenden Woods and Lodge Hill SSSI. Development at Chattenden Barracks offers the opportunity to create a high-quality residential-led scheme of up to 500 dwellings that integrates sensitively into the wider area and makes a positive contribution to the vitality of Chattenden. The proposed scheme will provide new pedestrian and cycle connections and new public open space whilst respecting and, where possible, enhancing ecological and biodiversity assets.</p>
	2	Chapter 2 – Vision and Strategic Objectives	19-25			
2649 2650 2651 2652 2653 2656 2657 2658 2659					<p>‘Vision for Medway in 2041’ ‘Spatial Development Strategy’</p>	<p><b>Vision</b></p> <p>Homes England is supportive, in principle, of the Council’s proposed Vision for Medway, which appears to consider a wide range of matters that will be essential to ensure that Medway is a successful, attractive and high-quality place for residents, businesses and visitors in the future.</p> <p>The Vision sets a framework for the area’s growth to 2041, which is consistent with the end of the plan period in the Regulation 18 document. The National Planning Policy Framework (December 2023), paragraph 22 states that: “<i>Strategic policies should look ahead over a minimum 15 year period from adoption...Where larger-scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</i>” To allow for slippage in anticipated adoption of the Local Plan programme and given the potential to incorporate large scale development to meet the Council’s housing needs over the plan period, Homes England considers that it would be appropriate for Medway Council to include a vision that looks 30 years ahead in accordance with the NPPF.</p>

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
					<div>Strategic Objectives – responses for each</div>	<p>As the Government’s housing and regeneration agency, Homes England is supportive of the aspiration that “<i>all sectors and ages of the community can find decent places to live</i>”. This aligns with the objectives outlined in Homes England’s Strategic Plan to create high-quality homes in well-designed places that respond to local priorities. Homes England’s site at Chattenden Barracks is available to assist Medway Council in achieving its Vision in relation to facilitating the provision of new homes.</p> <p>Homes England requests that the Vision be strengthened by making reference to the role that “vacant brownfield land” can play in delivering new homes. Given the scale of proposed housing growth in Medway, Homes England considers that the Vision should also reflect the fact that Medway will be delivering significant increases in housing during the Plan period, and therefore, should include a reference to the quantum of sustainable housing growth envisaged over the plan period. The Vision should clearly reference Medway Council’s intention to meet its identified housing need and also be clear on its intention to address economic/employment needs. This will ensure that the Vision provides a more positive framework for addressing housing and economic needs.</p> <p>Medway Council’s Vision of facilitating integration and improving quality of life is important. The development of Homes England’s sites at both Chattenden Barracks and Lodge Hill Camp have a key role to play in community integration, with the potential for employment generating land uses located close to new homes whilst enhancing the local environment in Chattenden through benefits associated with the redevelopment of vacant sites and enhancing connectivity and linkages particularly through to key/strategic green spaces such as Deangate Community Parkland.</p> <p>Achieving Medway Council’s Vision relating to attracting new investment and businesses would also be supported by development at Chattenden Barracks as creating high quality new homes in vibrant and successful places attracts people who want to live, work and invest in them.</p> <p><b>Strategic Objectives</b></p> <p>Homes England is supportive in principle of the proposed objectives as these are aligned with Homes England’s own objectives as set out in its Strategic Plan. Through collaborative joint working between Homes England, Medway Council and stakeholders, the potential and benefits from Chattenden Barracks can be maximised.</p> <p>The objective to “provide for homes of varying types to meet demand in Medway and ensure a cohesive sustainable approach” very much reflects Homes England’s objectives. Development at Chattenden Barracks will support this objective through the delivery of new homes across a range of sizes, types and tenures, offering increased choice within the local area (subject to viability).</p> <p>Homes England would look to continue to contribute to Medway Council’s objective of “conservation and enhancement of assets of international and national importance for nature and landscape, including biodiversity designations” through the ongoing management of the Chattenden Woods and Lodge Hill SSSI land at Lodge Hill.</p> <p>The objective that seeks to “reduce inequalities in health and deliver better outcomes for residents” is supported by Homes England. In accordance with Active Travel England ambitions, Homes England is looking at opportunities to maximise walking and cycling and promote the health and wellbeing of new residents at Chattenden Barracks. Homes England intends to use the Building for a Healthy Life tool to ensure that its schemes maximise the potential for healthy living.</p> <p>The objective to “secure jobs and develop skills for a competitive economy” is supported. It should be recognised that housing growth in Medway will result in boosting the local economy and providing job opportunities for local residents.</p>
					<div>Spatial Development Strategy response</div>	<p>The objective to strengthen and develop transport networks, providing safe and effective choices for sustainable travel is supported by Homes England. This approach should be at the heart of designing for new development and will be an important consideration in the redevelopment of the Chattenden Barracks site where there will be opportunities to extend existing active travel routes.</p> <p><b>Spatial Development Strategy</b></p> <p>Homes England welcomes reference in the Spatial Development Strategy for Medway to prioritise regeneration, making the best use of previously developed land.</p> <p>Homes England supports the commitment to achieving net zero carbon in Medway and addressing areas of poor environmental amenity and the delivery of Biodiversity Net Gain. There are opportunities to address these needs at Lodge Hill.</p>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
	3	Chapter 3 – Strategic Growth Options	26-28			
2661		Figure 1: Strategic Growth Options SGO 2 – p26 (see extract)	26		SGO 1 – Urban Focus SGO 2 – Disbursed Growth SGO 3 Blended Strategy (preferred)	<p><b>Spatial Growth Options</b></p> <p>The Regulation 18 (b) Local Plan sets out alternatives considered by Medway Council for the spatial distribution of future growth as Spatial Growth Options (SGO) where three SGOs have been assessed in the Interim Sustainability Appraisal (ISA). Medway Council’s preferred Option, SGO 3, blends regeneration, brownfield and greenfield development.</p> <p>Homes England broadly supports the overall assessment methodology of the Spatial Growth Options that has been undertaken by the Council.</p> <p>Homes England supports the ‘brownfield first’ approach taken by Medway Council which is a key aspect of the current December 2023 NPPF (paragraph 123) and one that the Government proposes to reinforce by way of the introduction of a presumption in favour of brownfield development in the revised NPPF (at paragraph 124(c)). Chattenden Barracks is a previously developed, brownfield site. It is in a sustainable, rural location and would represent a key opportunity to make efficient use of land. It will assist Medway in meeting its development needs whilst also making a positive contribution to the vibrancy and sustainability of Chattenden and the wider Hoo Peninsula. The overall aims and objectives of the draft Reg 18(b) Local Plan are broadly supported as these align with the objectives found in Homes England’s Strategic Plan (2023 to 2028).</p> <p><b>SGO 3</b></p> <p>Homes England requests that the edit below is incorporated which would include HHH3 as a brownfield site:</p> <p><i>‘3.1.4 SGO 3 blends regeneration, brownfield and greenfield development, and is the indicative preferred option. There is a ‘brownfield first’ focus with regeneration in urban centres and waterfront locations, complemented by range of sites in suburban and rural areas. About half of the development would be on brownfield land....’</i></p> <p>Homes England supports the ‘brownfield first’ approach taken by Medway Council which is a key aspect of the current December 2023 NPPF (paragraph 123) and one that the Government proposes to reinforce by way of the introduction of a presumption in favour of brownfield development in the revised NPPF (at paragraph 124(c)). Chattenden Barracks is in a sustainable, rural location and would represent a key opportunity to make efficient use of brownfield land. It will assist Medway in meeting its development needs whilst also making a positive contribution to the vibrancy and sustainability of Chattenden and the wider Hoo Peninsula.</p> <p><b>Site Specific Response</b></p> <p>Chapter 3 cross refers to, and is informed by, the Interim Sustainability Statement. Homes England supports the draft allocation of the Chattenden Barracks site (ref.HHH3) as an ‘Indicative Preferred Sites – Residential-led’ in this Statement where land broadly included in the red line for a future planning application is earmarked for residential led development, including the former military recreational ground to the north. It should be clarified that residential development is not proposed on the recreational ground land parcel. This is discussed in our comments relating to Chapter 10 Health, Communities and Infrastructure regarding open space below. The Recreation Ground to the north of Chattenden Estate offers significant opportunities for retention and potential enhancement to create a high quality and functional open green space for the benefit of the existing and new residents of Chattenden.</p> <p><b>Site HHH3 (Chattenden Barracks)</b></p> <p>The Interim Sustainability Statement Volume 1, reviews the site (HHH3) in Table 6.1: ‘The 24 reasonable alternative strategic development sites identified by Medway Council’ earmarking the site as suitable for Residential led development with a housing capacity of 500 homes. Specific to HHH3, the Interim Sustainability Statement 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.’ and within Table 8.14: ‘Outline reasons for selection / rejection of reasonable alternative strategic sites for the MLP as a ‘selected’ site’. Homes England welcomes the identification of the site for 500 new homes and continues to be supportive of a draft allocation at Chattenden Barracks. Regarding the site area of 25.34 hectares, Homes England reserves the opportunity to amend this overall site area as the scheme develops in discussion with Officers and the extent of proposed development area is confirmed.</p>
	4	Natural Environment	29-59			
2663 2682	Q.1	The Council could consider setting local	31	Climate Change	Policy S1: Planning for	Homes England recognises the importance of tackling climate change and sets out in its Strategic Plan the need to increase its focus on enabling sustainable homes and places, maximising positive contributions to the natural environment and minimising environmental impact. Homes England

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
		<u>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?</u>			<u>Climate Change</u>	<p>is working with its partners to adapt to changes to building regulations and the introduction of the Future Homes Standard which will be critical in reducing carbon emissions from homes.</p> <p>Going beyond the requirements of Building Regulations could be an ambition for Medway Council, but any such requirements need to be fully evidenced with consideration of different options and their benefits alongside consideration of viability and cost implications and the deliverability/practicality for all types of development sites. The Ministerial Statement made on 13<sup>th</sup> December 2023 (UIN HCWS123) clarifies that to be sound, local plans must be consistent with national policy and that any policies that go beyond current or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rational that ensures that development remains viable. The statement also clarifies that where plan policies go beyond current or planned building regulations, those policies should be applied flexibly to decisions on planning applications.</p> <p>The Local Plan evidence base should consider elements such as emissions, water efficiency targets, renewable energy schemes, Green Infrastructure provision and Active Travel as these all have a role to play in reducing climate change. Several emerging Local Plan policies are therefore likely to be addressing climate change. Consideration should also be given to requirements for monitoring of carbon emissions, environmental impact and resilience to climate change across the life of new homes and buildings.</p>
2666 2682	Q.2	<u>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?</u>	33	<b>BNG</b>	<u>Policy S2: Conservation and Enhancement of the Natural Environment</u>	<p>Homes England recognises that draft Policy S2 requires that development proposals demonstrate that significant harm to biodiversity can be avoided; if not, then adequately mitigated, or as a last resort, compensated. This policy requirement aligns with the policy wording of the NPPF and reflects the ‘mitigation hierarchy’ and is therefore supported.</p> <p>Homes England considers that it is desirable that developments should support and help promote the conservation, enhancement and restoration of biodiversity across the plan area.</p> <p>Homes England welcomes the need for development proposals to seek opportunities to strengthen biodiversity networks (including notified SSSIs) and in parallel support the conservation objectives of associated biodiversity site management plans. Homes England also supports the premise that development proposals, including at Chattenden Barracks, contribute to strategic environmental management programmes to ensure an effective mitigation approach in particularly sensitive locations, such as in close proximity to designated sites, in this case, the Chattenden Woods &amp; Lodge Hill SSSI.</p> <p>Draft Policy S2 promotes the conservation, restoration and enhancement of priority habitats and species and seeks opportunities to deliver net gains for biodiversity. Homes England supports the Government’s statutory requirement for 10% in BNG.</p> <p>Should the Council seek to require more than the statutory minimum of 10%, this approach would need to be fully evidenced, taking into account implications on site deliverability, practicality and viability for a range of site typologies, from constrained brownfield sites to larger greenfield sites.</p>
2668 2682	Q.3	<u>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</u>	36	<b>SAMMS</b>	<u>Policy S3: North Kent Estuary and Marshes designated sites</u>	<p>Homes England recognises the presence of internationally important birdlife of the Thames Estuary and Marshes SPA and Ramsar, Medway Estuary and Marshes SPA and Ramsar and the Swale Estuary SPA and Ramsar sites; and acknowledges the requirement to address potential cumulative development and recreational pressures on these sites. Homes England therefore supports the tariff based approach applied to development within 6km of the coastal European sites that has, through the Birdwise SAMMS scheme, been demonstrated to be successful and effective in managing increasing recreational pressure along the coastline. The tariff based approach provides a clear and easily understood solution to the pressures of increasing population for developers and stakeholders alike. The proposed development at Chattenden Barracks would be compliant with this policy in relation to SAMMS contributions. Contributions towards SAMMS from developments within the 6km zone provides sufficient certainty that the additional recreational pressures from schemes in combination would avoid Likely Significant Effects on the European sites in question.</p>
2669 2682	Q.4	Do you consider that Medway Council should	39	<b>Landscapes of local value</b>	<u>Policy S4: Landscape</u>	<p>It is noted that the latest Landscape Character Assessment (LCA) (2024) that Medway are seeking comments on will provide an evidence base to inform LVIA work (scoping and the individual assessments). Homes England notes that the Chattenden Barracks site is identified as an Urban Area</p>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
		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?			<u>protection and enhancement</u>	<p>within the Landscape Character Assessment (Figure 6.1) and subsequently supports this approach as it reflects the previously developed nature of Chattenden Barracks.</p> <p>Any planning application for land at Chattenden Barracks will be supported by a Landscape and Visual Impact Assessment (LVIA) and will consider opportunities for enhancements to Green Infrastructure and opportunities to create important green links. This will be based on viewpoints agreed with Medway Council’s Landscape Officer.</p> <p>It is noted that the LCA identifies Chattenden Barracks as being classified as Grade 3 Agricultural land (the mapping does not show the subdivision of Grade 3 land). Whilst this is consistent with the Natural England Regional Agricultural Land Classification Mapping, it is noted that these maps represent a generalised pattern of land classification and should not be applied to individual sites. It is important to reiterate that Chattenden Barracks is a previously developed site that have been in various military uses from the 1870s onwards and have not been in agricultural use for over 150 years. Any agricultural use of the site would not be consistent with the pattern of built development in this part of Chattenden and given the extensive built development and hardstanding on the site, along with the need for some remediation, agricultural use would not be viable. The Grade 3 land use should not therefore be used as a criterion to consider the appropriateness of the site for the provision of new homes.</p>
2670 2682	Q.5	Do you agree that the Council should promote Natural England’s Green Infrastructure Framework standards in the Medway Local Plan policy?	42	<b>Natural England’s Green Infrastructure Framework standards</b>	<u>Policy S5: Securing Strong Green and Blue Infrastructure</u>	<p>Homes England is supportive of the Local Plan’s objectives around the connectiveness of existing and proposed green infrastructure on the Hoo Peninsula and beyond, the integration of new development into the landscape and the improvement of access where appropriate and achievable, acknowledging access needs to be balanced with protection of the natural environment. Homes England is aware of and is supportive of strategic green infrastructure proposals such as those at Deangate Community Parkland that can become anchors for green networks to ensure Green Infrastructure (GI) resilience into the future.</p> <p>Homes England supports the principle of encouraging developments to work towards Natural England’s Green Infrastructure Framework Standards. The standards have a useful role to play in assisting local authorities and developers in considering GI early on and ensuring that opportunities for GI are maximised. It may be more appropriate for the Local Plan to reference the standards as guidance to assist developers and other stakeholders in developing their GI strategies rather than duplicating the standards. It is also important to recognise that it may not be possible for all sites, particularly brownfield or constrained sites to meet all of the standards and there should be sufficient flexibility to address site specific circumstances.</p> <p>Homes England will look to engage with <i>Making Space for Nature in Kent and Medway</i> to input into the development of Local Nature Recovery Strategy priorities and measures with a particular focus on the role that Homes England’s land at Lodge Hill can play in a wider Hoo Peninsula strategy.</p>
2672 2682	Q.6	<u>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?</u>	42	<b>Green and Blue Infrastructure Framework</b>	<u>Repeated: Policy S5: Securing Strong Green and Blue Infrastructure</u>	<p>Homes England broadly supports the general strategic approach being taken to the protection of and provision of green and blue infrastructure across Medway as set out in the draft Medway Green and Blue Infrastructure Framework document (July 2024) and proposed Policy S5. Homes England places significant importance on the retention and protection of green infrastructure assets as part of its day-to-day management of the Lodge Hill estate and will look at GI enhancement opportunities as part of emerging development proposals. These natural assets will be an important consideration for the design process at Chattenden Barracks and will seek to maximise opportunities to create wider green infrastructure connections.</p> <p>Homes England supports the strategic priorities set out in the Framework document. The following are particularly important in developing proposals for the Chattenden Barracks site:</p> <ul style="list-style-type: none"> <li>• Protect, enhance and improve the core biodiversity sites;</li> <li>• Support increased active travel;</li> <li>• Prioritise improving access to greenspace;</li> <li>• New development should try to incorporate SuDS schemes that are integral to the green infrastructure;</li> <li>• Link people and nature;</li> <li>• Provide access to green infrastructure close to home;</li> <li>• Support people in taking healthy exercise; and</li> <li>• Strengthen landscape character.</li> </ul> <p>The identified key priorities for the Hoo Peninsula as set out in the draft Medway Green and Blue Infrastructure Framework will be used to guide development of the proposals for Chattenden Barracks. Of particular importance to the scheme are the following priorities/opportunities:</p> <ul style="list-style-type: none"> <li>• Promote habitat resilience in relation to SSSI notified features – Homes England’s commitment to active management of the Chattenden Woods and Lodge Hill SSSI to support the resilience of notified features along with the potential to create habitat enhancements as part of proposals for Chattenden Barracks could play a key role in working towards this priority.</li> </ul>

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
						<ul style="list-style-type: none"> <li>Homes England recognises the role of available greenspace in absorbing recreational pressure to designated sites and will support, as part of the proposals for Chattenden Barracks, informal managed recreational access to Deangate Community Parkland (where possible) along with supporting opportunities to create access to Deangate from the existing and proposed residential areas in the vicinity. Homes England also recognises the important role of developing sensitively designed access to the surrounding Chattenden Woods and Lodge Hill SSSI where sensitive landscape works associated to the potential provision of controlled access could actually result in enhancements to the wider SSSI. Sensitively designed green networks have a role to play in encouraging pedestrian access to certain areas whilst directing people away from the most sensitive areas.</li> <li>Better access to existing greenspace. Development of the Chattenden Barracks could benefit from improvements and public access to the former military Recreation Ground north of the Chattenden Estate that offers opportunities for new linkages and greenspace for new and existing residents in the area. Homes England will also explore the potential to develop promoted walking trails and look to support greenways and traffic free routes where possible. Options for such routes in the vicinity of Chattenden Barracks will be explored as part of the development of future masterplanning proposals for the site.</li> <li>Improve the accessibility of cultural heritage sites through opportunities for interpretation. Homes England will assess the feasibility around the ability to provide safe access to existing heritage features across the wider Lodge Hill estate for the enjoyment of existing and future residents as part of wider ranging delivery thinking.</li> <li>New green infrastructure should integrate SuDs into the design of space rather than as a separate feature. Where appropriate the Chattenden Barracks scheme design will seek to create multi-functional sustainable drainage with biodiversity and open space benefits. Opportunities for swales as well as dry storage ponds will be investigated.</li> </ul>
2673		<b>Policies without Questions specifically related</b>		<b>Kent Downs AONB</b>	<u>Policy S6: Kent Downs Area of Outstanding Natural Beauty National Landscape</u>	Homes England's comments on proposed Policy S6 are made in the context of the Lodge Hill site. Land at Lodge Hill is located over 5km north east from the Kent Downs AONB at its nearest point. Views in the direction of Lodge Hill from the Kent Downs AONB are screened by multiple layers of tree cover and undulation in terrain, including Great Chattenden Wood and Round Top Hill, located to the west of Chattenden Barracks. Draft Zones of Theoretical Visibility models have shown no intervisibility between the proposed development and the Kent Downs AONB, hence it is considered unlikely that proposed development would have any likely visual influence on the AONB or its setting. This will be confirmed once the Landscape and Visual Impact Assessment work for the Chattenden Barracks site has been progressed.
2674				<b>Flood and Water Management</b>	<u>Policy DM1: Flood and Water Management</u>	Homes England supports the broad principles of proposed Policy DM1 around promoting water efficiency measures and protecting and enhancing water quality and to comply with this policy will prepare a comprehensive Flood Risk Assessment and Outline Drainage Strategy to support redevelopment proposals. Homes England will work closely with the Lead Local Flood Authority in developing its proposals for drainage of the site. Surface water will be managed on site via a range of sustainable drainage techniques in accordance with the preferred drainage hierarchy. An outline surface water drainage strategy will accompany any planning application for Chattenden Barracks. Sustainable drainage features on site will be designed to maximise benefits associated with biodiversity, integration with green infrastructure and creating multi-functional areas.
2675				<b>Contaminated Land</b>	<u>Policy DM2: Contaminated Land</u>	<p>Proposed Policy DM2: Contaminated Land accords with national guidance but may benefit from additional clarity regarding the timing of investigations. It states that these will be required '<i>in conjunction with relevant development proposals</i>'. It is assumed that 'relevant development proposals' could be either with an outline or full application or in other cases it may be more appropriate to be conditioned.</p> <p>As part of developing its proposals for the development of new homes at Chattenden Barracks, following the recommendations of a Desk Based Phase 1 Land Quality Assessment, Homes England has undertaken detailed Phase 2 site investigations on the site itself and surrounding area. The findings of this work confirm that the land is suitable for the development of new homes after ground remediation works have taken place.</p> <p>Due to the Lodge Hill estate being (historically) a target for bombing during the inter-war periods and in view of the legacy of past military training usage, to facilitate the deliverability of Chattenden Barracks into the future, the site is subject to assessment in relation to land contamination (including Ordnance). Ongoing works around ordnance investigation and future remediation will enable new homes to be developed.</p>
2680				<b>Air Quality</b>	<u>Policy DM3: Air Quality</u>	<p>Homes England broadly supports the principles of draft Air Quality - Policy DM3. However, the following wording changes are required for clarity:</p> <ol style="list-style-type: none"> <li>The policy refers to "the introduction of low Nitrous Oxide (NO<sub>2</sub>) boilers". This should state "low nitrogen oxides (NO<sub>x</sub>) boilers" instead.</li> <li>The final sentence reads "Development with the potential for impacts resulting from air quality, such as from traffic, industrial emissions, on the ecology of designated sites will be required to demonstrate avoidance or appropriate mitigation." This should rather state: "Development with the potential to cause air quality impacts as a result of emissions to air, such as traffic or industrial emissions, on the ecology of designated sites will be required to demonstrate avoidance or appropriate mitigation."</li> </ol>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
						<p>In addition, we suggest the following minor wording changes to the draft supporting text:</p> <p><i>“4.10.2 Large, potentially polluting developments, which generate a significant amount of vehicle movements, have the potential to significantly affect air quality. Therefore, and air pollution quality impact assessments must be completed, and mitigation measures provided, in accordance with local air quality guidance, must be completed.”</i></p> <p><i>“4.10.3 The impact of any proposals on ambient air quality will also be important where the development could in itself result in the designation of Air Quality Management Areas or conflict with any Air Quality Action Plans declared by the Council. In appropriate circumstances, air quality impact assessments studies through using air dispersions modelling and appropriate modelling will be made legally binding through the use of planning conditions or planning obligations (S.106 agreements).”</i></p> <p><i>“4.10.4 The use of renewable and alternative energy sources; and integrated transport strategies, will all help to improve air quality and also contributing to reducing CO<sub>2</sub> emissions. However, biomass burning can pose challenges to air quality. A shift towards more biomass burning in urban areas of Medway could have significant impacts on air quality and public health if only the potential climate change benefits are considered. There could be conflict with policies relating to energy, and therefore very careful consideration of the air quality impacts relating to proposed development of biomass burning will be required.”</i></p>
2681				Noise and Light Pollution	Policy DM4: Noise and Light Pollution	<p>Homes England recognises the importance of ensuring that noise and light pollution are minimised and that adequate mitigation is incorporated into development proposals – being particularly mindful of the presence of bat corridors across parts of the Lodge Hill estate. In the case of proposed development at Chattenden Barracks, this mitigation could include appropriate design buffers/dark corridors and development of a sensitive lighting strategy to avoid light spillage.</p> <p>Draft Policy DM4 would benefit from some re-wording for clarification. The reference to noise should be removed from the third bullet point <i>“Where appropriate, technology and efficiency, such as motion sensors and LED lights, have been incorporated into design to reduce levels of noise and light”</i> as this is only relevant to lighting.</p> <p>The sentence: <i>“Planned development, either through an extant planning permission or allocated in the Local Plan, must be considered”</i> would benefit from further clarity, for instance whether it relates to the requirement for LVIA in the previous paragraph, or if it is stating that draft Policy DM4 is applicable to all planned development.</p>
	5	Built Environment	60-76			
2683		Policies without Questions specifically related		High Quality Design	Policy T1: Promoting High Quality Design	<p>Homes England broadly supports proposed Policy T1 as it seeks the high-quality design of new development that makes a positive contribution and responds appropriately to the character and appearance of its surroundings which reflects Homes England’s strategic objectives. It is noted and acknowledged that this policy predicates compliance with the principles of nationally recognised standards and Building Regulations so far as practicable.</p> <p>The precedent set by the existing aesthetic within Chattenden and nearby settlements and design principles set around creating new green corridors, open spaces and enhanced connectivity through the site and with the surroundings are established. These design principles have already sought to underpin the early visioning around the design delivery of Chattenden Barracks and this early work will continue to inform the evolution of the emerging masterplan proposals for Chattenden Barracks alongside inputs from the existing community, key stakeholder groups and statutory stakeholders through engagement.</p> <p>To manifest the early thinking around design and sustainability, a draft Vision Document has been prepared and will be regularly updated, to reflect emerging technical detail and design inputs to inform a holistic approach to future masterplanning. Account will also be taken of emerging draft policy, supplementary planning information and Medway Council and stakeholder engagement along with outputs from emerging technical works.</p> <p>Homes England’s Building for a Healthy Life criteria provide a national policy-based framework for high quality design and placemaking, focusing on the three topics of ‘Integrated Neighbourhoods,’ ‘Distinctive Places’ and Streets for All’. 12 subheadings contain coding on crucial topics, which will directly inform a design code uniquely tailored for Chattenden Barracks.</p> <p>To ensure high quality design at Chattenden Barracks, bespoke character areas will be developed that respond to the rich natural context, and the existing urban fabric and architectural styles found in Chattenden and the Hoo Peninsula. The character areas could be supported by the thorough</p>

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
						<p>design code to implement best principles from the very beginning of the design, achieving responsive and suitable development for the differing contexts of Lodge Hill Camp and Chattenden Barracks.</p> <p>Homes England would be keen to understand how the positive work presented within the previous iterations of the Hoo Development Framework will be taken forward into future design policy / guidance for applicants / consultees.</p> <p>Where at all possible, Homes England will look to integrate the key principles set out its vision and strategic framework for design and sustainability.</p>
2684				<b>Housing Design</b>	<u>Policy DM5: Housing Design</u>	<p>Draft Policy DM5: Housing Design aims to provide good living conditions for future occupants of housing developments as would be the case at Chattenden Barracks. This could include high quality, robust, adaptable homes, which are inclusive and include functional spaces that respond to changing resident needs throughout their lives and support the undertaking of necessary day to day activities. As part of Homes England’s housing delivery, there is a commitment to adherence to Government Standards including the Nationally Described Space Standards (NDDS) and other nationally set requirements which should be the starting point for housing design requirements. Beyond this, Building for a Healthy Life’s criteria on ‘Homes for Everyone’ will be met, providing further coding on providing ‘a mix of housing types and tenures that suit the needs of the local community’.</p> <p>It is noted the policy wording goes beyond National standards and if this approach is taken forward this should be robustly evidenced, and viability and deliverability tested by Medway Council to ensure the future policy wording is appropriate.</p>
2685				<b>Sustainable Design and Construction</b>	<u>Policy DM6: Sustainable Design and Construction</u>	<p>Homes England is generally supportive of the draft Policy DM6 and note the requirement in paragraph 5.4.3 to meet a national Building Regulations standard for water efficiency of 125 litres/person/day for new development.</p> <p>Homes England notes that there is a discrepancy between paragraph 5.4.3 which references the requirement to meet the water efficiency standard of 125 litres/person/day vs the wording in draft Policy DM6 which makes reference to 110 litres/person/day and qualifies it to “where possible”. The Policy should be amended to reflect the supporting text.</p> <p>Homes England will aim to ensure that sustainable design and construction methods are used during the development and design process. The Council’s requirement for new development to contribute to ‘reducing the impact of climate change and to meeting carbon net zero emissions’ is also supported and sustainable design will be a key priority as part of the evolving masterplanning process at Chattenden Barracks.</p> <p>In addition to the above, it is noted that development at Chattenden Barracks would reflect the key priorities outlined in the draft Policy DM6 wording, as such an EIA Scoping Report would be submitted prior to any formal planning application submission. The Outline Planning Application will also include an Environmental Statement with key environmental topics scoped in and will be informed by the consultee responses received at Scoping stage in order to ensure sustainable development is at the forefront of the design evolution and subsequent proposals for the site. Moreover, the proposals for Chattenden Barracks have been developed to date with the central themes of the NPPF in mind which focus upon ‘place making, sustainable design and sustainability’, as mentioned in Paragraph 5.4.8 of the Regulation 18(b) Plan and Homes England intends to continue to develop the proposals with these key themes in mind by focussing on achieving a well-designed place that promotes sustainable transport and responds to the challenges of climate change.</p> <p>In summary it is noted that Homes England is uniquely placed to bring forward sustainable development at the Chattenden Barracks site.</p>
2686				<b>Historic Environment</b>	<u>Policy S8: Historic Environment</u>	<p>Homes England is generally supportive of the draft Policy S8 and supporting text in relation to the historic environment. The Policy wording clearly outlines Medway Council’s commitment to the conservation, enhancement and enjoyment of the historic environment. Whilst no historical features of note are present on the Chattenden Barracks site, there are potential opportunities for the enhancement of land located in the setting of prominent heritage features located on other parts of the Lodge Hill Estate as part of a wider holistic design approach. Any such opportunities identified will be worked through in liaison with Medway Council and Historic England.</p>
2687				<b>Heritage Assets</b>	<u>Policy DM9: Heritage Assets</u>	<p>The principle of draft Policy DM9 – Heritage Assets is supported. It can be confirmed that proposals associated to the early visioning for Chattenden Barracks will not negatively impact (nor result in the loss of) any above ground heritage assets on that parcel.</p> <p>A degree of archaeological investigation has already been undertaken on the wider Lodge Hill site and specifically relating to Chattenden Barracks. Subsequently, engagement is being held with Officers at Kent County Council (KCC) around requirements associated with any forthcoming planning applications in relation to the treatment of any below ground findings at Chattenden Barracks. This approach accords with the draft policy.</p>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
						<p>Notwithstanding the above positions, to comply with draft Policy DM9, a desk-based Heritage Statement would be prepared to support any forthcoming planning application at Chattenden Barracks. This would set out details from the Historic Environment Record and consider the historical development of the site.</p> <p>Consideration should be given to incorporating draft Policy DM11 with draft Policy DM9 as Policy DM9 is titled ‘Heritage Assets’. Such assets include built heritage, archaeological remains and historic landscapes.</p>
2688		<b>Policies without Questions specifically related</b>		<b>Scheduled Monuments and Archaeological Sites</b>	<u>Policy DM11: Scheduled Monuments and Archaeological Sites</u>	<p>The principle of draft Policy DM11 - Scheduled Monuments and Archaeological Sites is supported. As noted above, consideration should be given to incorporating this policy with Policy DM9.</p> <p>The Chattenden Barracks planning application would include an Archaeological Statement. A degree of archaeological investigation has already been undertaken on the wider Lodge Hill site and specifically Chattenden Barracks. Subsequently, engagement is being held with Officers at Kent County Council (KCC) around requirements associated with any forthcoming planning applications in relation to the treatment of any below ground findings at Chattenden Barracks. This approach accords with the draft policies.</p>
	<b>6</b>	<b>Housing</b>	<b>77-103</b>			
2689			77	<b>Housing Numbers</b>	<u>Paragraph 6.1.2</u>	<p>Introductory paragraph 6.1.2 of Chapter 6 – Housing sets out that the Council is using the Government’s Standard Method for calculating Local Housing Need. As of March 2024, this was defined as 1,658 homes per year.</p> <p>Homes England is broadly supportive in principle of the approach to following the Government’s adopted housing targets. However more detailed analysis and review, particularly linked to the provision of a buffer as an uplift above the housing targets is suggested below. It is noted that this is a minimum target and opportunities to increase beyond the minimum target should be appropriately reviewed to ensure a diverse mix of housing can be delivered and ensure that the Plan is positively prepared.</p> <p>It is noted that there is a live consultation on proposed changes to the NPPF which could impact these housing numbers and Medway Council should ensure that an up-to-date housing target is set in line with Government policy/targets, and where possible aim to deliver beyond this quantum of homes. It is also noted these changes are still a draft for consultation and therefore may change.</p> <p>The draft revised NPPF (July 2024) (paragraph 62) makes the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate hard constraints and that they have exhausted all other options (see Chapter 4, paragraph 6 consultation document). Increasing housing supply is at the forefront of the proposed revisions. In addition, the proposed amended text seeks to reverse other changes to the NPPF made in December 2023 which the Government consider were detrimental to housing supply. The Government is proposing a new Standard Method which it is understood seeks to ensure that local plans are ambitious enough to support the Government’s manifesto commitment of 1.5 million new homes in this Parliament.</p> <p>The ‘Outcome of the Proposed Revised Method’ spreadsheet published by MHCLG on 30<sup>th</sup> July 2024 (post publication of the Reg. 18(b) consultation) sets out figures for each Local Planning Authority across England and how the revised standard method alters housing targets. For Medway, this shows the Proposed Method sets 1,644 homes per annum, representing less than a 1% reduction (14 units / annum) on the 1,658 homes per annum under the Current Method. This is broadly aligned to the draft plan as the consultation considers how the plan could meet housing needs of around 28,000 new homes over the plan period (see Executive Summary). However, the Plan period identified (2022 – 2041), covers 19 years which would actually result in 31,502 dwellings (based on the Current Method of 1,658 per annum) or 31,236 under the Proposed Method or 1,644 per annum if the dwellings per annum figures are applied.</p> <p>These housing figures should be further increased to allow for a 20% buffer to ensure that there is a realistic prospect of achieving the planned level of housing supply. The Medway Housing Delivery Test Action Plan June 2024 was prepared after the publication of the latest Housing Delivery Test Results published in December 2023. It explains (at paragraph 1.8)_that “Medway achieved a housing delivery of 79% in December 2023, up from 67% in January 2022, 55% in the previous year and in the mid-40s in the first two years. This means that an action plan should be prepared and a buffer of 20% should be applied to the local housing need”.</p> <p>As stated above, the Council indicates that the housing needs for Medway over the Plan period of 2022-2041 is 28,000 homes. It is noted that no buffer is proposed in the draft text which is a requirement of the draft NPPF July 2024 (Paragraph 76):</p> <p><i>“...The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:..</i></p>

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
						<p><i>b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”</i> (undersupply set out in the Medway Housing Delivery Test Action Plan June 2024)</p> <p>Medway Council has not been able to deliver against its housing requirement since the mid-1980s, only being able to do so in with it in 2008/09 and 2009/10. This has no doubt contributed to the current shortage of housing in Medway and the current identified need.</p> <p>Given the recent undersupply demonstrated by the Housing Delivery Test measurement as set out in the Action Plan, a buffer of 20% in addition to Medway’s assessed housing need would comply with the NPPF and would ensure choice and competition in the market for land. A 20% buffer would provide the clarity and certainty needed to demonstrate that the Local Plan has been prepared positively and would deliver the new homes needed.</p> <p>The Spatial Growth Options set out in Chapter 3 of the draft Local Plan seek to meet the scale of housing growth in Medway by 2041. Medway Council continues to update its evidence base and assessment work to inform the final content of the Local Plan. The draft policies presented for consultation sets out the preferred approach and the current evidence base. Homes England welcomes the further work being undertaken and has previously provided a draft Vision document for the Lodge Hill site that should be included in work being undertaken for the next stage of the Plan to inform the site-specific policies linked to the draft allocations. The draft Vision document, underpinned by a series of technical assessments, demonstrates that delivery of new homes at Chattenden Barracks is achievable in the short term to meet local development needs as required by paragraph 69 of the NPPF.</p> <p>Medway Council should adopt a strategy which, as a minimum, seeks to meet the area’s Objectively Assessed Need (OAN) and is informed by agreements with other authorities so that unmet need from neighbouring authorities is accommodated in Medway “<i>where it is practical to do so and is consistent with achieving sustainable development</i>” (draft NPPF paragraph 36(a)). The proposed revised draft NPPF amends the “maintaining effective co-operation” section of the NPPF to ensure that the right engagement is occurring on the sharing of unmet housing need and other strategic issues where plans are being prepared. The revised draft NPPF paragraph 24 provides that: “<i>Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience, are addressed. Local planning authorities and county councils (in two-tier areas) continue to be under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries</i>”. Whilst this wording may change prior to adoption, the Government clearly wants to encourage greater collaboration between authorities and therefore, it is important for the Council to consider how it could increase its own housing requirement and supply to address some of these unmet needs from neighbouring authorities, otherwise the Plan may be considered not legally compliant or positively prepared.</p>
2689 2696	Q.10	<u>Do you think this policy provides effective guidance on the required housing mix in Medway?</u>	79	<b>Housing Mix</b>	<u>Policy T2: Housing Mix</u>	<p>Homes England is broadly supportive of draft Policy T2 with regard to the Council’s aim to ‘<i>ensure a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population</i>’. The policy wording appears to build in a level of flexibility which is important to ensure it is effective and can allow for consideration of additional or updated evidence as demand may change over time to reflect market conditions and the economic climate. This will assist in creating a successful place that responds to the needs of the local community. Homes England’s proposed development at Chattenden Barracks offers the potential to support these objectives through the delivery of new homes across a range of sizes, types and tenures, offering increased choice within the local area.</p> <p>The policy wording goes on to state that ‘<i>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</i>’. This supports an appropriate housing mix that will depend on site specific circumstances which is supported by Homes England.</p> <p>The Viability Assessment proposes a housing mix for all tenures, albeit noting that this document was last updated in 2021 so this data may be out of date. The housing mix is broken down further between market and affordable units and houses/apartments in Table 8.4 Summary of Overall Dwelling Mix taken from the 2021 Local Housing Market Assessment (LHMA). For the Chattenden Barracks site, early analysis shows that there may be limited demand for private apartments and bungalows, this demonstrates the need for any policy to be flexible to ensure that it can be informed by up- to-date site specific market evidence.</p>
2690 2696	Q.11	<u>Do you agree with having a 10% requirement for affordable housing on urban brownfield sites and 30% requirement for affordable housing on</u>	82	<b>Affordable Housing</b>	<u>Policy T3: Affordable Housing</u>	<p>Draft Policy T3 Affordable Housing sets levels of affordable housing through the Local Plan Viability Assessment 2021 and states:</p> <p>“<i>The level of affordable housing required is informed by the Local Plan Viability Assessment, which distinguishes between high value and low value/marginal areas. In line with the viability evidence, the requirement will be for:</i></p> <ul style="list-style-type: none"> <li>• <i>In high value areas, including the Hoo Peninsula and suburban greenfield sites,</i></li> </ul>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
		<u>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?</u>				<p>30% of all residential units proposed.</p> <p>• <i>In lower value areas, such as brownfield inner urban sites, 10% of all residential units proposed.”</i></p> <p>Homes England request that greater clarity is provided around this policy as for the case of the Chattenden Barracks site, it is located on the Hoo Peninsula however it is a brownfield site, therefore it is suggested that there is a ‘medium’ affordable housing requirement set out in the policy too, suitable for a previously developed site of this nature between the 10-30% range.</p> <p>The Viability Assessment 2021 (paragraph.10.43) states:</p> <p><i>“there is capacity to seek increased levels of affordable housing on greenfield sites, however it is necessary to consider a lower affordable housing target on brownfield sites”.</i> Which demonstrates the differences of sites and how they should be assessed in terms of affordable housing provision.</p> <p>These different affordable housing contribution ‘areas’ should be clearly defined as currently it is not clear which these apply to, for example ‘High Value Area(s)’. If the Council intends to continue with this approach, Homes England suggests a map is provided to define the ‘High Value Area(s)’ and ‘Lower Value Area(s)’ as well as any other areas (i.e. ‘Medium Value Area(s)’) to ensure the policy can be easily and correctly interpreted. This should include further explanation of the different areas and how they have met a set of criteria linked to an updated Local Plan Viability Assessment which, it is noted, is out of date.</p>
2691 2696	Q.12	<u>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?</u>	82	<b>Affordable tenure split</b>	Repeated: Policy T3: Affordable Housing	<p>Medway Council set out the latest tenure mix derived from the Local Housing Need Assessment which provides an affordable housing mix as detailed below:</p> <ul style="list-style-type: none"> <li>• 51% social/affordable rented housing.</li> <li>• 49% affordable home ownership including First Homes.</li> </ul> <p>Homes England is broadly supportive of this split for the affordable tenure. However, the appropriate tenure mix will be dependent on the current need at the time of scheme delivery and subject to viability. It may also vary depending on the latest first-time buyer or other Government schemes that are available at the time. Chattenden Barracks would provide the opportunity for much needed affordable homes in Medway.</p> <p>It should also be noted that the Government is proposing to remove the requirement that a minimum of 25% of affordable housing units secured through developer contributions should be First Homes, as set out in the ‘Affordable Homes Update’ Written Ministerial Statement of 24 May 2021. The Council may want to reconsider their commitment to 49% affordable home ownership on this basis.</p>
2691 2696	Q.13	<u>Do you have any views on the delivery of affordable housing, and the cascade principle? What evidence can you provide to support your views?</u>	82	<b>Affordable delivery &amp; Cascade principle</b>	Repeated: Policy T3: Affordable Housing	Homes England is supportive of the cascade principle for the provision of affordable housing adopted in draft Policy T3 as it appears to build a level of flexibility into planning obligations which could better allow the housing mix to reflect market conditions which is key to ensuring development viability.
2692 2696	Q.15	<u>Do you have any sites you wish to promote for self-build allocation?</u>	99	<b>Self Build</b>	Policy T9: Self-build and Custom Housebuilding	Homes England is supportive of the principle of a small percentage of custom build housing on larger development sites (where this type of delivery is appropriate) in order to ensure that people have greater options when choosing a home and to promote innovative design. The Chattenden Barracks site has the potential to offer some degree of custom build housing subject to both viability and deliverability.
2693				<b>Small Sites and SME Housebuilders</b>	Policy T11: Small Sites and SME Housebuilders	Homes England is generally supportive of the principle of draft Policy T11 which appears to predominantly relate to smaller sites. However, it appears that there are opportunities to sub-divide larger sites as indicated in the policy wording which Medway Council considers could speed up the delivery of homes and includes SME builders as part of an accelerated delivery. Homes England is supportive of a diverse house building market in its Strategic Plan (2023-2028). Therefore, this policy is supported in principle and if the site-specific nuances of delivering homes at Chattenden Barracks supports a sub-division of that site, this would be considered by Homes England.
	<b>7</b>	<b>Economic Development</b>	104-119			
2698		<b>Policies without Questions specifically related</b>		<b>Economic Strategy</b>	Policy S10: Economic Strategy	Homes England is broadly supportive of draft Policy S10: Economic Strategy insofar as the Council will seek to boost Medway’s economic performance, securing a range of jobs for its workforce with a focus on directing principal employment development to the broad locations as set out in policy.

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
						Paragraph 7.2.5 of the supporting text notes the “significant potential for the regeneration, and redevelopment, of employment sites on the Hoo Peninsula”. However, this is not reflected in the draft policy which refers to the Hoo Peninsula, and specifically sites at Kingsnorth and Grain, being suitable for larger scale Net Zero Carbon Energy generating uses and port using facilities. The policy should be amended to ensure that the potential for a full range of employment uses on the Hoo Peninsula can be realised, particularly on brownfield sites, and not just at the sites at Kingsnorth and Grain.
	8	Retail and Town Centres	120-151			
2701		Policies without Questions specifically related		Town Centres Strategy	Policy S15: Town Centres Strategy	Homes England supports the promotion of a network of centres but draft Policy S15 should reflect the blended growth strategy preferred in Chapter 3 and acknowledges the potential growth in the Hoo Peninsula as part of that strategy. This would make the policy consistent with Policy S16 in setting the scene for the Hierarchy of Centres where it is acknowledged new centres could come forward to support the anticipated growth.
2703	Q.28	Would provision of a supermarket in Hoo be beneficial to residents to encourage sustainable travel patterns, convenience and sustainable lifestyles?	140	Supermarket provision in Hoo	Policy S22: Hoo Peninsula	Homes England is supportive of new growth for the Hoo Peninsula requiring supporting infrastructure and centres to provide for the needs of new residents to ensure appropriate provision for residents but also support efficiencies and sustainability.  Homes England supports growth in the Hoo Peninsula and the opportunity for future centres, shops and services to support growth in a sustainable way. A new supermarket in an appropriate location as part of this offer would help support the blended growth strategy preferred in Chapter 3. However, Homes England is keen to understand how the feasibility of potential supermarket provision works in relation to the commercial functionality / viability of local centres including that existing at Hoo.
2705 2708	Q29.	Do you agree with the boundaries and retention of these listed local and rural centres?	144	Local and rural centres	Policy DM12: Local and Rural Centres	Homes England supports the inclusion of new local centres and day to day shopping facilities and services in areas of strategic growth in accordance with the blended growth strategy preferred in Chapter 3.  Homes England is interested to understand the timescales for publication of emerging local retail centre assessment to inform future demand in the area and to inform area specific policies.
2706 2708		Policies without Questions specifically related		Meanwhile Uses	Policy T19: Meanwhile Uses	Whilst meanwhile uses are clearly to be encouraged as Homes England acknowledges that they can inject much needed activity back to vacant sites, it is Homes England’s view that such uses can be managed sufficiently through temporary planning permissions, advertisement consents and permitted development rights. The proposed introduction of the need to submit a Meanwhile Feasibility Study and Strategy to all major development proposals in draft Policy T19 appears to be an unnecessary burden to large scale development proposals. The potential impact of the policy does not appear to match the intent of this policy and therefore it may be more appropriate if this policy were removed for the reasons set out above.
	9	Transport	152-172			
2710		Policies without Questions specifically related		Vision for Access and Movement in Medway	Vision for Access and Movement in Medway (not policy)	Homes England supports the Vision approach as it is a positive way to tackle traffic congestion and is aligned to the emerging NPPF.  Redevelopment of Chattenden Barracks provides an important opportunity to bring forward much needed new homes on a brownfield site in the Hoo Peninsula which will make a positive contribution to the vitality of Chattenden. Proposals will align with the Medway Vision for Access and Movement by providing new pedestrian and cycle connections and new public open space within the site and enhancing existing provision to help reduce car dependency.
2711				Monitoring and Managing Development	Policy DM15: Monitoring and Managing Development	The proposed method of allocating vehicle trip credits to site allocations based on the Strategic Transport Assessment (STA), identifying a package of mitigation based on this but requiring development proposals to demonstrate a 10% reduction of the trip credit is an innovative policy. However, offering a developer contribution discount could indicate a bias towards a vehicle-based transport mitigation package, rather than promotion of diversion of funding to active travel, public transport or other sustainable transport opportunities. It is therefore suggested that this approach and potential implications are fully considered as part of the Council’s work on the Local Plan.  Homes England considers that the approach to the Medway-wide Monitor and Manage Mitigation Strategy will need to be clearly defined in the STA and the Infrastructure Delivery Plan (IDP) to ensure that there is sufficient funding for appropriate and effective multi-modal transport mitigation.  The wording in draft Policy DM15 states that development proposals and allocations in urban centres will be exempt from developer contributions ‘due to their accessible location...’. The fact that these developments will generate vehicular trips to locations further afield and therefore have an impact of the road infrastructure capacity should be a consideration. In addition, the IDP will be expected to include pedestrian, cycle and public transport infrastructure and bus services, all of which will be used by the occupants of new development in urban centres.



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
						Homes England supports this policy in principle, however it considers that there needs to be a transparent and consistent approach to the application of this policy, so that the level of developer contributions provides sufficient funding for the multi-modal transport interventions that will be included within the IDP. This should form part of the evidence base.
2715				<b>Grain Branch</b>	<a href="#">Policy DM17: Grain Branch</a>	<p>The Policies Map shows safeguarded land for new rail infrastructure, including a station, route alignment and buffer stop zone.</p> <p>Homes England agrees in principle that a rail upgrade to the Grain Branch could be helpful to the wider delivery of housing and economic growth on the Hoo Peninsula and would remove vehicle trips from the congested road network. However, given the length of time involved in such schemes and the large amount of work to be undertaken and costs involved, this should not delay the Local Plan. Therefore, identifying the land as safeguarded is considered to be appropriate until such time as detailed proposals are in place. The Medway Traffic Model testing will need to reflect the timescales for the delivery of the station and impacts on traffic flows on the Hoo Peninsula road network.</p>
2717				<b>User Hierarchy and Street Design</b>	<a href="#">Policy T25: User Hierarchy and Street Design</a>	Draft Policy T25 reinforces the need for the design of new development to apply the street user hierarchy that prioritises pedestrians and cyclists and facilitates access to public transport. This approach should be at the heart of designing for new development. Homes England support the Government's national guidance in this regard.
2719				<b>Accessibility Standards</b>	<a href="#">Policy T26: Accessibility Standards</a>	Draft Policy T26 is supported as the 15-minute accessibility to services and facilities, and ease of access to bus services is a concept that will help reduce car dependency, and consequently can have a positive impact on addressing traffic congestion and associated environmental impacts. Homes England support the Government's national standards in relation to accessibility.
2720				<b>Transport Assessments, Transport Statements and Travel Plans</b>	<a href="#">Policy DM18: Transport Assessments, Transport Statements and Travel Plans</a>	<p>Draft Policy DM18 is supported as the production of these documents is a basic requirement in support of a planning application for a development proposal. Clarity will be required on the methodology for assessment to ensure a consistent approach.</p> <p>It is noted that the policy includes the need for development proposals on the Hoo Peninsula to adhere to an Area-wide Travel Plan. Whilst Homes England is aware that the principle of AWTP's have been suggested by Medway Council before, it would be helpful to have some clarity on the methodology and the timescales for the preparation of this Plan.</p> <p>There will need to be a consistent approach to the implementation, monitoring and review of Travel Plans. Clarity is required on Medway Council's proposals for this.</p>
2721 2722	Q.35	Adequate overnight lorry parking would reduce the risk of lorries parking in locations that lack proper facilities and/or cause a nuisance. Are there local shortages for overnight lorry parking in Medway?	170	<b>Overnight lorry parking</b>	<a href="#">Policy DM19: Vehicle Parking</a>	<p>The Council's current vehicle parking standard is set out in Appendix B. The adopted standards date back to 2001, but the 2010 addendum provides flexibility in the application of the standards to reduce parking provision and optimise development density where the development has good transport alternatives and/or has good accessibility to services and facilities. It would be useful to understand if Medway Council monitors the impacts of parking provision within new developments for use in guiding appropriate provision within forthcoming development schemes.</p> <p>The policy requirement for all on-street and off-street parking bays will accommodate an electric vehicle charging point is supported in principle subject to viability and practicality of provision.</p> <p>The encouragement of electric vehicle car club membership through Travel Plans is supported where a car club is viable, as a car club is a means to reduce car ownership and electric vehicles reduce environmental impacts.</p>
2725		<b>Policies without Questions specifically related</b>		Cycle Parking and Storage	<a href="#">Policy DM20: Cycle Parking and Storage</a>	Overall, draft Policy DM20: Cycle Parking and Storage is supported as it is a means to reduce dependency on cars. Planning applications for residential and non-residential development will be determined in accordance with the adopted cycle parking standard, subject to consideration of site-specific circumstances or material considerations that indicate otherwise. The reference to site-specific circumstances is welcomed.
	10	<b>Health, Communities and Infrastructure</b>	173-193			
2727 2741	Q36.	Are there any core health and wellbeing issues or opportunities missing from the policy?	178	<b>Health and wellbeing</b>	<a href="#">Policy T27: Reducing Health Inequalities and Supporting Health and Wellbeing</a>	Homes England welcomes the Council's draft policy wording that supports development in Medway that provides opportunities for healthy lifestyles, contributes to the creation of healthier communities, and helps reduce health inequalities. Such opportunities should be considered early on during the Concept Masterplanning stages of development. Homes England uses Building for a Healthy Life as a guide to ensure that opportunities to encourage healthier lifestyles and healthy communities are embedded in its proposals.

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
2728		<b>Policies without Questions specifically related</b>		<b>Existing Open Space and Playing Pitches</b>	<u>Policy T28: Existing Open Space and Playing Pitches</u>	Homes England is supportive of draft Policy T28 which aims to protect publicly accessible public open space for future generations. Concept Plan feasibility work around the provision of future public open space is being considered at the current time with the potential to best utilise existing open space across the wider Lodge Hill site. As part of ongoing masterplanning, the former military Recreation Ground is subject to feasibility around potential future enhancement along with how best to facilitate ongoing public access in associated with the emerging masterplanning of the Chattenden Barracks site.
2731 2741	Q.40	The designation of land as Local Green Space allows communities to identify and protect green areas of particular importance to them. The Local Green Space designation should only be used where the green space is: a) in reasonably proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land. Please use the online map to identify a green area for consideration as designated Local Green Space	184	<b>Local Open Greenspaces – identify locations</b>	<u>Policy DM21: New open space and playing pitches</u>	Homes England is generally supportive of the principle of draft Policy DM21 and would aim to ensure the policy standards could be attained as part of any development to be brought forwards at Chattenden Barracks. However, it is noted that the accessibility and quantity standards identified in DM21 are not based on the Fields in Trust benchmarks but are based on the standards recommended in the Open Space Assessment (2024). This is referenced at paragraph 10.3.8. Given the differing standards being proposed, it is important that there is flexibility to allow for a different mix of open space typologies that may be better suited to certain types of sites and that there is some flexibility regarding provision depending on the site circumstances. Viability and the need to make good use of sites and use land efficiently should also be a consideration where the proposed standards go beyond the Fields in Trust Standards.
2735		<b>Policies without Questions specifically related</b>		<b>Community and Cultural Facilities</b>	<u>Policy T29: Community and Cultural Facilities</u>	<p>Homes England supports the principles of draft Policy T29 and the importance that it places on community and cultural facilities. Provision of such facilities does however need to be justified in terms of evidence of anticipated demand or proven existing need and it needs to be financially viable. It also needs to be appropriate to the scale of development proposed, linked to the level of demand.</p> <p>The future emerging Infrastructure Delivery Plan and associated local plan policy should clearly indicate the Council's reasonable expectations for delivery of community facilities in connection with the Council's preferred development scenario referencing the rationale for the need/demand for that use with underpinning evidence.</p> <p>There is an existing community centre located immediately to the north of the Chattenden Barracks site at Swinton Avenue. Future development of the Chattenden Barracks site may assist in galvanising the provision of associated improvements to this community facility (subject to its existing level of capacity and use). The location of the Community Centre set between the Chattenden Barracks site and the existing Chattenden Estate creates an opportunity to enhance an established local facility which can only help to bring existing (and potential new) communities together.</p> <p>The creation of a pedestrian-friendly route allowing access from Chattenden Barracks to the Community Facility will also be key to encourage active travel through walking. This could be linked to pedestrian connections northwards to the Recreation Ground that would provide opportunities for informal recreation for the local community, encouraging active lifestyles and wellbeing.</p>
2737 2741	Q.42	<u>Do you agree identifying the required infrastructure to support the scale and</u>	191	<b>Mini IDP or other approach</b>	<u>Policy S24: Infrastructure Delivery</u>	<p>Question response:</p> <p>Homes England agrees in principle with the approach set out in proposed Policy S24, that new development needs to deliver or contribute towards new or improved infrastructure to mitigate its impact, where appropriate. An up-to-date Infrastructure Delivery Plan (IDP) is key to informing these</p>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Homes England - Representations
		<u>locations of growth within Medway is the correct approach? Would a 'mini IDP approach' focusing on broad locations and strategic sites be preferred? Or do you have an alternative suggested approach?</u>		<b>to identify infrastructure</b>		<p>requirements, although site specific impacts need to be considered to avoid developments having to contribute to existing capacity issues rather than the contribution being proportionate to the level of impact. This will ensure that developer contributions accord with the CIL Regulation tests.</p> <p>The IDP is a critical part of the Medway Local Plan and needs to be comprehensively updated as a priority to inform developer contributions going forward. Some infrastructure requirements are applicable to all of Medway, but there will be some requirements that are more specific to particular areas and could therefore be grouped together in the IDP to reflect the location of the site allocations.</p> <p>Homes England welcomes the opportunity to input into the Viability Appraisal (that will feed into the IDP) in relation to its site at Chattenden Barracks. Being a brownfield site, there are likely to be some abnormal costs associated with site remediation. It is therefore not necessarily considered to be appropriate to group the site with greenfield Hoo sites for viability purposes.</p> <p>The IDP needs to consider all funding options and phasing of infrastructure requirements. As recognised by the policy, input from key stakeholders such as the Primary Health Care Trusts and Utility providers is key in ensuring that requirements are clear and guided by key stakeholders as part of a clear plan for the area. Some infrastructure upgrades have lengthy lead in times, so as much information on phasing as possible will assist providers in planning for these works if not already part of a programme of planned works.</p> <p>Delays with preparation of the IDP should not prevent development from coming forward provided that it can clearly set out and provide mitigation for its impact, either in terms of provision of infrastructure or financial contributions to infrastructure in the form of developer contributions.</p> <p>Homes England welcomes the opportunity to input into the Council’s updated viability work.</p> <p>Policy Response: Homes England supports the broad policy approach to planning obligations as set out in draft Policy S24: Infrastructure Delivery. The reference to national guidance is welcomed as it is important to ensure that all obligations accord with the three tests for obligations as set out in the NPPF at paragraph 57:</p> <ul style="list-style-type: none"><li>• Necessary to make the development acceptable in planning terms;</li><li>• Directly related to the development; and</li><li>• Fairly and reasonably related in scale and kind to the development.</li></ul> <p>The policy makes reference to the sequence of infrastructure provision, with ‘onsite delivery of infrastructure ahead of occupation’ being the preference. Homes England requests that this distinguish between different types of infrastructure, as it would not be appropriate to provide all infrastructure ahead of occupation. This could be for technical funding/viability or practical reasons.</p> <p>Homes England would like to stress the need to ensure that all contributions sought are fully justified and evidence based, with up-to-date evidence.</p> <p>Homes England welcomes the clarity regarding Medway Council’s approach to viability appraisals, specifically the need for an ‘open book’ appraisal.</p>



LOCAL PLAN TEAM  
Medway Council  
Gun Wharf  
Dock Road  
Chatham  
Kent  
ME4 4TR

Your ref: Reg 18b Consultation  
Our ref: Lodge Hill Camp, Homes  
England  
6 September 2024

Sent by Email: [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)

Dear Sir/Madam,

**Medway Council - Regulation 18(b) Local Plan 2041 Consultation – Lodge Hill Camp, Chattenden**

These representations have been prepared by WSP on behalf of Homes England in response to Medway Council's Regulation 18 (b) Local Plan 2041 Consultation and relate to Homes England's interest in the future of Lodge Hill Camp. In addition, separate representations are also being made in relation to Chattenden Barracks.

**Introduction**

Homes England is an executive non-departmental public body, sponsored by the MHCLG, and the governments' Housing and Regeneration Agency. Homes England has the aspiration, influence, expertise and resource to drive positive market change. By releasing more land to developers who want to make homes happen, Homes England assists in the delivery of the new homes England needs and helps to improve neighbourhoods and grow communities. Homes England works in collaboration with partners who share its ambition, including local authorities, private developers, housing associations, lenders and infrastructure providers.

As set out in Homes England's Strategic Plan 2023-28, its mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice across England and the creation of places people are proud to call home.

A key focus for Homes England is the quality of what is being delivered, including championing environmental sustainability, design and beauty in homes and places that they support to create distinctive places and spaces that are designed for people to use and thrive.

The former defence land at Lodge Hill, including the Lodge Hill Camp Site has been in military use for over 140 years. It was transferred to Homes England from the MOD in early 2018. The Plan in Appendix 1 shows the location of Lodge Hill Camp which extends to a site area of approximately nine hectares.



## **Purpose of Representations**

Pursuant to Regulation 18 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 these representations are made in respect of the Draft Medway Local Plan 2041 published in July 2024 (herein referred to as the 'Reg.18 (b) Local Plan') to confirm Homes England's position in respect of its land interests at Lodge Hill Camp.

An overview of Homes England's key site-specific representations is set out in this letter which is accompanied by a detailed review of the consultation material in the attached schedule (**Appendix 2 - Full Representations to the Medway Local Plan 2041 Regulation 18 and Appendices**).

These representations have sought to answer the questions posed by Medway Council, where relevant, as well as providing comments relating to individual policies and appended evidence base documents. In addition, all of these comments have been uploaded individually through the Medway online consultation portal.

## **Support for the Plan Making Process**

These representations have specific regard to the NPPF December 2023, paragraph 15 (and 'Draft text for consultation' July 2024 paragraph 16) in relation to the Government's local plan making requirements and the tests for soundness as set out in further detail in this letter. Homes England is supportive of Medway Council progressing their new Local Plan to Adoption and therefore is setting out suggestions in these Representations to help ensure that the Plan is as sound as possible for when it is examined by the Inspector. The Plan needs to be prepared in accordance with legal and procedural requirements to ensure that it is positively prepared, justified, effective and consistent with national policy (test of soundness Examining Plans, NPPF Paragraph 35 (Paragraph 36 NPPF 'Draft text for consultation' (July 2024))). Homes England's comments are made in order to assist with the Plan-Making process, noting the publication of the draft NPPF was post publication of the Reg. 18(b) Local Plan. As such, in preparing these representations, the Medway Local Plan 2041 Regulation 18 (b) - July 2024 and its accompanying appendices have been considered.

## **Background**

Homes England is the freehold owner of the Lodge Hill estate. The entire landholding extends to around 325 hectares and comprises significant land parcels including Chattenden Barracks, Lodge Hill Camp, the former Military Training Area, and other parcels of land sitting in and around the Chattenden Woods and Lodge Hill SSSI. The location of Lodge Hill Camp is shown on the accompanying plan (Appendix 1).

These representations seek to ensure that development opportunities at Lodge Hill Camp make a positive contribution, not only to meeting the development needs of the area but also to the vibrancy and success of the wider place and the community of Chattenden.

Working with a range of delivery partners, it is Homes England's intention to promote and progress proposals for the Lodge Hill Camp parcel. Lodge Hill Camp has potential for a range of uses including, but not limited to employment, residential, community and education.

Lodge Hill Camp was promoted in the Medway Call for Sites in February 2023 and in the Medway Land Availability Assessment in October 2023 (Lodge Hill Camp - HHH1). Homes England has

previously made representations as part of Medway Council's Local Plan (2041) preparation process, with the most recent representations being made to the Regulation 18 Consultation stage in October 2023.

A draft Vision Document incorporating early opportunities / constraints thinking and an initial vision for both the Chattenden Barracks and Lodge Hill Camp parcels commenced preparation in 2023 drawing on the available evidence base at the time. The draft Vision Document is the starting point for the proposals that will be developed further with community and key stakeholder engagement.

### **Medway's Strategic Growth Options**

Medway Council's preferred Option, SGO 3, blends regeneration, brownfield and greenfield development.

Homes England broadly supports the overall assessment methodology of the Spatial Growth Options that has been undertaken with some further detailed comments provided in **Appendix 2 - Full Representations to the Medway Local Plan 2041 Regulation 18 and Appendices**.

Homes England supports the 'brownfield first' approach taken by Medway Council as Lodge Hill Camp is a previously developed, brownfield site. The parcel is in a sustainable, rural location and represents a key opportunity to make efficient use of land and assist Medway in meeting its development needs whilst also making a positive contribution to the vibrancy and sustainability of Chattenden and the wider Hoo Peninsula. The overall aims and objectives of the draft Reg 18(b) Local Plan are broadly supported as these align with the objectives found in Homes England's Strategic Plan (2023 to 2028).

However, Homes England do not agree with the assessment of the Lodge Hill Camp parcel in the Interim Sustainability Appraisal 2024 (Appendix to Reg 18b), which rejects the site for the reasons identified in bold below. Homes England's response is summarised below and set out in

**Appendix 2.** Homes England request that the Lodge Hill Camp site be re-considered for inclusion as a preferred employment led development site.

- **Close proximity to SSSI and Ancient Woodland** - HHH1 is located outside the SSSI. Proximity to the SSSI should not prevent appropriate land uses/redevelopment which can be sympathetically designed to minimise impacts.
- **Potential loss of BMV agricultural land** – HHH1 is brownfield with an extensive apron constituting existing buildings and hardstanding. It is understood that the site has not been in agricultural use for at least 150 years and given the brownfield nature of the site there is no potential for future agricultural use.
- **Coalescence between settlements** – HHH1 has clear site boundaries and is currently occupied by buildings and hardstanding. Redevelopment of the site would not result in any coalescence between settlements.
- **Beyond reasonable walking distance to current public transport services** – the closest bus stop to HHH1 is around 750m from the site on Lodge Hill Lane. Whilst this is more than the preferred 400m, it is not a significant distance. The appraisal should consider the potential for the bus service to be extended and enhanced if the site was to be redeveloped. The context of nearby preferred sites for new homes that will benefit from



Active travel and public transport improvements should also be a consideration. Therefore, there is considerable potential for bus service improvements in the vicinity of the site linked to other proposed developments.

Moreover, the published Land Availability Assessment Report (October 2023), whereby it was recommended that the site should progress to the next stage, indicates that the Council considered that the site did have development potential. As the Employment Land Needs Assessment has not yet been updated, the level of need cannot be confirmed. It is therefore appropriate to consider inclusion of Lodge Hill Camp to assist in contributing to the future provision of a mix of employment sites on the Hoo Peninsula.

It is also noted that on the latest version of the Policies Map that part of the Camp area is also now designated as a 'Minerals Consultation Area', noting that an area to the north of the Former Military Training area is designated as a 'Minerals Safeguarding Area' (Policy T30). However, it is understood that this is likely to be an anomaly on the Policies Map in relation to this site and we are making representations in relation to this point to Medway as part of our formal response.

Based on the above, it is considered that the allocation of the site should remain for mixed uses, noting the following:

- Many of the reasons cited for the removal of the site have been further clarified above.
- The site is located outside of the SSSI and is a brownfield site.
- The site has a number of buildings in situ which could be re-used, intensified and/or replaced through (sensitive) wholesale redevelopment.

### **Deliverability in line with the NPPF**

The NPPF requires local authorities to prepare local planning policies that are aspirational but deliverable. In relation to "supporting a prosperous rural economy", NPPF Paragraph 69 (Paragraph 88, NPPF 'draft text for consultation' (July 2024)) states that planning policies should enable:

- "a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful buildings [beautiful replaced by new in consultation text];
- b) the development and diversification of agricultural and other land-based rural businesses;
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship."

The above criteria have been used to consider the proposals for the Lodge Hill Camp Site.

These are outlined below:

#### Available now:

Homes England is the sole landowner of the site. It is the Agency's intention that the site will be brought forward for development in the short to medium term, including the potential delivery of much-needed homes, employment, education (incl. training) or community uses and associated infrastructure to benefit the community.

#### Suitable for development:

In determining that the site is suitable for redevelopment, a number of factors have been considered, including Medway's growth strategy, the optimal use of the site and site-specific influences.

Key to the successful reuse of this previously developed land is ensuring flexibility in the planning policies to ensure it is brought back into effective use. It is also worth noting that possible retention of the buildings on site could meet the requirements of a niche operator, the planning use of which might not fall neatly within the existing use classes. In line with the NPPF Paragraph 122 ('Draft text for consultation' Paragraph 121), the brownfield nature of the site significantly contributes to its suitability for redevelopment:

*"Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land"*

Furthermore, Homes England has undertaken a significant amount of environmental work and initial technical work that informs the suitability of the site for development. This concludes that there are no overriding constraints to development and that the site is suitable for the proposed uses that could include employment, residential, education or community.

#### Achievable:

Work undertaken to date demonstrates that the delivery of potential mixed use development at Lodge Hill Camp is achievable with a realistic prospect that development could be delivered on the site in short to medium term.

Whilst Homes England principally supports and accelerates the delivery of housing led projects, the Agency also has experience of bringing forward mixed use schemes that require the delivery of associated infrastructure. Having greater control over the timing of infrastructure delivery assists in accelerating development.

### **Conclusions**

Homes England is supportive of the progress made since the previous Regulation 18 consultation (2023) including the Council's Vision, strategic objectives and overarching growth strategy. In particular, Homes England agrees with the brownfield first approach, as there is significant land of this type for potential development for homes, jobs and services on the Hoo Peninsula. For this reason and those outlined above, it is recommended that Land at Lodge Hill Camp is included in the Plan for mixed uses, contrary to the outcomes of Medway Council's Interim Sustainability Appraisal.

Lodge Hill Camp is a brownfield site on previously developed land that is available, suitable and achievable, making it deliverable for development, making an important contribution to Medway's





growth strategy. There is considerable opportunity to provide a well-designed, high-quality and sustainable development that minimises the impact on the local environment.

The full representations contained in **Appendix 2** seek to provide targeted comments, focusing on a small number of suggested clarifications and amendments considered necessary to ensure that the Reg 18 (b) Local Plan and the specific policies supporting the delivery of Medway's aspirations for growth are effective, consistent with national policy and support the Plan's timely delivery.

Homes England look forward to continuing dialogue with Medway Council and playing a role in shaping the Local Plan at each stage of the plan-making process, through to Adoption.

If you require any further information, please contact [beth.wells@wsp.com](mailto:beth.wells@wsp.com) or the undersigned.

Yours faithfully,



Amy Jefferies MTCP MA UD MRTPI  
Planning Director

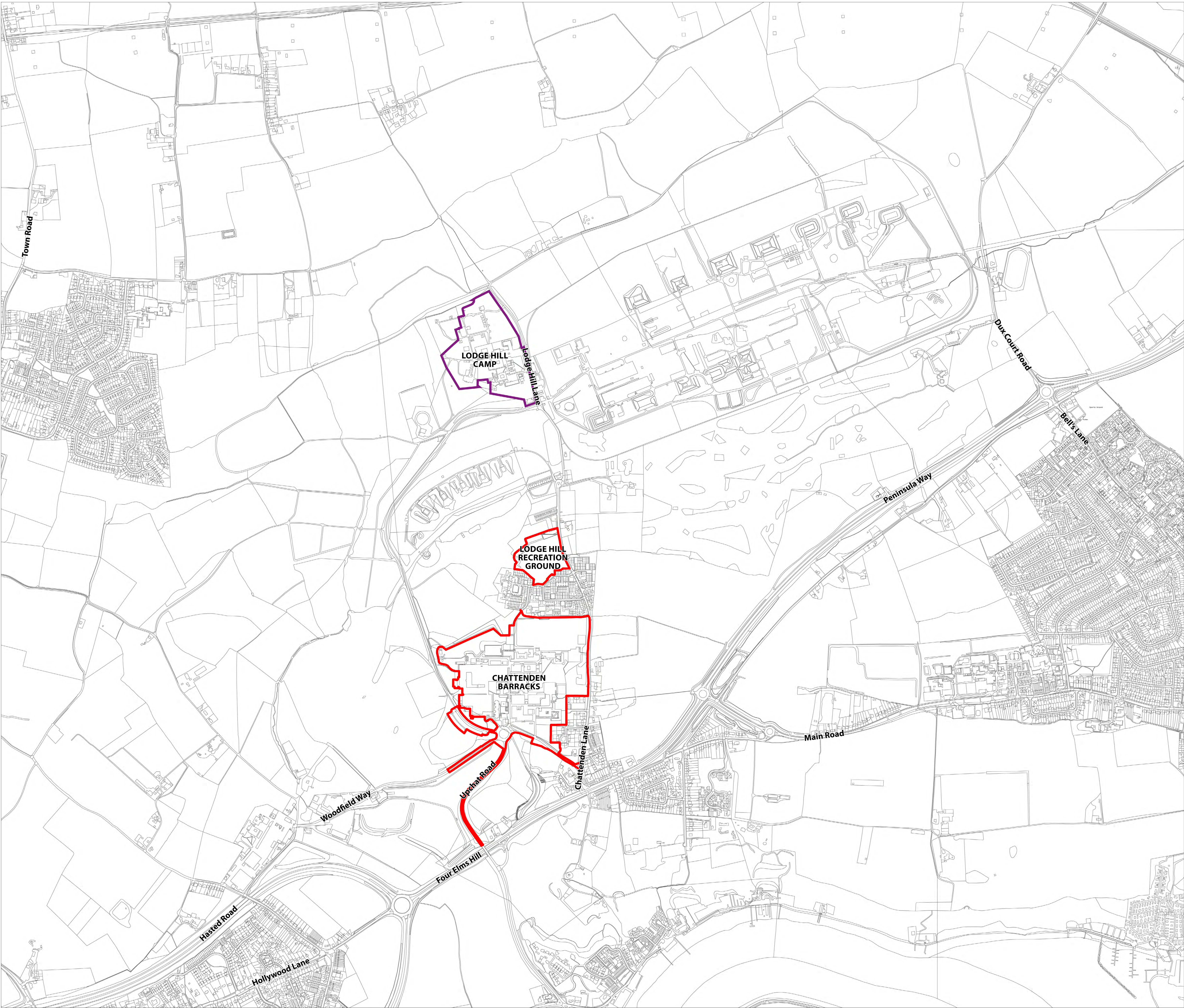


**Appendices :**

Appendix 1 - Location and Ownership Plan

Appendix 2 – Full Representations to the Medway Local Plan 2041 Regulation 18 and Appendices





**Key**

— Chattenden Barracks site (25.34 Ha)

— Lodge Hill Camp site (9.40 Ha)

Rev	Date	Description
F	29/04/24	Labelling added
G	29/09/24	Place labels added

Drawn	Old	Rev	Date	Description
DS	CI	.	15/06/22	Drawing first issue
FV	CI	A	11/07/22	Update to drawing
AS	CI	B	13/01/23	Change colour of Lodge Hill Camp boundary
FV	MQ	C	18/01/23	Addition of Lodge Hill Camp boundary
FV	MQ	D	18/01/23	Addition of site areas
FV	MQ	E	28/02/23	Removal of DRAFT watermark

Drawn	Old	Drawn	AS
FV	FV	Checked	FV
AS	CI	Date	15/06/22
FV	MQ	Scale @ A0	1:5000
FV	MQ		
JS	MQ		



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
		Representation Introduction – Lodge Hill Camp				
2870						<p>WSP UK Ltd (WSP) has been instructed by Homes England to submit Representations to the Regulation 18(b) Medway Local Plan and appendices in relation to its land at Chattenden Barracks and Lodge Hill Camp, Lodge Hill. Separate representations are made in relation to each of these two sites. This document relates to Lodge Hill Camp.</p> <p>Homes England is the Government’s housing and regeneration agency. Its mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. This objective supports; greater social justice; the levelling up of communities across England and the creation of places people are proud to call their home. Homes England’s mission is underpinned by a number of strategic objectives that are outlined in its Strategic Plan (2023 – 2028) (link: <a href="https://www.gov.uk/government/publications/homes-england-strategic-plan-2023-to-2028">https://www.gov.uk/government/publications/homes-england-strategic-plan-2023-to-2028</a>).</p> <p>Homes England is the freehold owner of 325ha of the Lodge Hill estate. These representations seek to ensure that Homes England’s land, including development opportunities at Lodge Hill Camp make a positive contribution, not only to meeting the development needs of the area but also to the vibrancy and success of the wider place. In line with the NPPF paragraph 122 (‘Draft text for consultation’ Paragraph 121), the brownfield, ‘previously-developed’ nature of the sites significantly contribute to their suitability for redevelopment, making efficient use of land.</p> <p>The location of Lodge Hill Camp is shown on the accompanying plan [<b>Appendix 1</b>]. Homes England is promoting land at Lodge Hill Camp for mixed uses that could include employment, residential, education and community uses. The site has been submitted to the Medway Call for Sites Submission in February 2023 and to the Medway Land Availability Assessment in October 2023 (Lodge Hill Camp - HHH1). Homes England has also made representations as part of Medway Council’s Local Plan (2041) preparation process, with the most recent representations being made to the Regulation 18 Consultation stage in October 2023.</p> <p>A draft Vision Document was prepared for Chattenden Barracks and Lodge Hill Camp in 2023. This set out Homes England’s initial vision for the sites, drawing on the available evidence base at the time. It sets out details of the emerging proposals for both Chattenden Barracks and Lodge Hill Camp in order to demonstrate that there are no overriding constraints to development, confirming that the proposals are robust and deliverable taking into account the availability of the land, its suitability and the likely economic viability of the proposals. The draft Vision Document is the starting point for the proposals that will be developed further through engagement with the local community and key / statutory stakeholders.</p> <p><b>Lodge Hill Camp</b></p> <p>Lodge Hill Camp extends to around 9ha and is located in the northwestern part of the Lodge Hill estate. The Camp is accessed via Lodge Hill Lane with an additional access (currently closed to vehicular traffic) along Lochat Road which provides an alternative route to Chattenden Lane. The existing development in this area dates back to the inter war period and includes an extensive network of buildings and structures of differing quality surrounded by paved parking areas and mown grass. The land parcel is well screened by woodland to the north and west. The site is still used on a meanwhile basis by a number of public sector agencies for training purposes in keeping with its established training use, but is available for redevelopment. Lodge Hill Camp provides opportunities for a range of uses including but not limited to employment, residential, community and education to support and benefit Chattenden and the economic aspirations harboured within the wider Hoo Peninsula catchment.</p>
	2	Chapter 2 – Vision and Strategic Objectives	19-25			
2870 2872 2873 2874 2876 2877					<p>‘Vision for Medway in 2041’ ‘Spatial Development Strategy’</p>	<p><b>Vision</b></p> <p>Homes England is supportive, in principle, of the Council’s proposed Vision for Medway, which appears to consider a wide range of matters that will be essential to ensure that Medway is a successful, attractive and high-quality place for residents, businesses and visitors in the future.</p> <p>The Vision sets a framework for the area’s growth to 2041, which is consistent with the end of the plan period in the Regulation 18 document. The National Planning Policy Framework (December 2023), paragraph 22 states that: “<i>Strategic policies should look ahead over a minimum 15 year period from adoption.....Where larger-scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</i>” To allow for slippage in anticipated adoption of the Local Plan programme and given the potential to incorporate large scale development to meet the Council’s housing needs over the plan period, Homes England considers that it would be appropriate for Medway Council to include a vision that looks 30 years ahead in accordance with the NPPF.</p>

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
					<div>Strategic Objectives – responses for each</div>	<p>As the Government’s housing and regeneration agency, Homes England is supportive of the aspiration that “<i>all sectors and ages of the community can find decent places to live</i>”. This aligns with the objectives outlined in Homes England’s Strategic Plan to create high-quality homes in well-designed places that respond to local priorities. Homes England’s site at Lodge Hill Camp is available to assist Medway Council in achieving its Vision in relation to new homes, employment and other land uses.</p> <p>Homes England requests that the Vision be strengthened by reference to the role that “vacant brownfield land” can play in delivering new homes as well as employment opportunities. Given the scale of proposed housing growth in Medway, Homes England considers that the Vision should also reflect the fact that Medway will be delivering significant increases in housing during the Plan period, and therefore, should include a reference to the level of sustainable housing growth envisaged over the plan period. The Vision should clearly reference Medway Council’s intention to meet its identified housing need and also be clear on its intention to address economic/employment needs. This will ensure that the Vision provides a more positive framework for addressing housing and economic needs.</p> <p>Medway Council’s Vision of facilitating integration and improving quality of life is important. Development of Homes England’s sites at both Chattenden Barracks and Lodge Hill Camp have a key role to play in community integration, offering a balance of jobs and other land uses close to new homes whilst enhancing the local environment in Chattenden through benefits associated with redevelopment of derelict sites and enhancing connectivity and linkages particularly to key/strategic green spaces such as Deangate Community Parkland.</p> <p>Achieving Medway Council’s Vision relating to attracting new investment and businesses would also be supported by development at Chattenden Barracks and Lodge Hill Camp as creating high quality new homes in vibrant and successful places attracts people who want to live, work and invest in the community.</p> <p><b>Strategic Objectives</b></p> <p>Homes England is supportive in principle of the proposed objectives as these are aligned with Homes England’s own objectives as set out in its Strategic Plan. Through collaborative joint working, the potential and benefits from Lodge Hill Camp can be maximised.</p> <p>The objective to “<i>provide for homes of varying types to meet demand in Medway and ensure a cohesive sustainable approach</i>” very much reflects Homes England’s objectives. Development at Lodge Hill Camp can support these objectives through the delivery of a mix of uses that could include employment, residential, education and community uses.</p> <p>Homes England would look to continue to contribute to Medway Council’s objective around the “<i>conservation and enhancement of assets of international and national importance for nature and landscape, including biodiversity designations</i>” through the ongoing management of the Chattenden Woods and Lodge Hill SSSI land at Lodge Hill.</p> <p>The objective that seeks to “<i>reduce inequalities in health and deliver better outcomes for residents</i>” is supported. In accordance with Active Travel England ambitions, Homes England is looking at opportunities to maximise walking and cycling and promote the health and wellbeing of those using a redeveloped Lodge Hill Camp into the future. This could be for new residents or those working, studying at or visiting Lodge Hill Camp, dependent on the mix of uses. Homes England intends to use the Building for a Healthy Life tool to ensure that its schemes maximise the potential for healthy living.</p> <p>The objective to “<i>secure jobs and develop skills for a competitive economy</i>” is supported. It should be recognised that housing growth and mixed use development in Medway will result in boosting the local economy and providing job opportunities for local residents. All opportunities for mixed use development at Lodge Hill Camp that could assist Medway Council in meeting its objectives should be considered. This could include residential and non-residential land uses.</p> <p>The objective to “<i>strengthen and develop transport networks, providing safe and effective choices for sustainable travel</i>” is supported. This approach should be at the heart of designing for new development and will be an important consideration in the redevelopment of Lodge Hill Camp where there will be opportunities to extend existing active travel routes.</p> <p><b>Spatial Development Strategy</b></p> <p>Homes England welcomes reference in the Spatial Development Strategy for Medway to prioritise regeneration, making the best use of previously developed land.</p>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
						<p>Homes England supports the commitment to achieving net zero carbon in Medway, addressing areas of poor environmental amenity and the delivery of Biodiversity Net Gain. There are opportunities to address these needs at Lodge Hill.</p> <p>The Strategy refers to the “<i>provision for sustained economic growth, through providing a mixed portfolio of employment sites, supporting business growth and capitalising on a skilled workforce...</i>”. There is reference to strategic development sites on the Hoo Peninsula that have unique opportunities to support new and developing sectors, as the economy develops responses to environmental and industrial policies. Homes England considers that its land at Lodge Hill Camp has a key role to play in assisting Medway Council as part of this strategy in relation to economic growth, offering the potential to provide a range of land uses. It should therefore be included in the mapping of employment sites illustrated on the Hoo Peninsula (within the North West Policies Map). <b>Further rationale for the proposed inclusion of Lodge Hill Camp is set out within the response regarding ‘Spatial Growth Options’ and in particular under ‘Site Specific Response’.</b></p>
	3	Chapter 3 – Strategic Growth Options	26-28			
2881		Figure 1: Strategic Growth Options SGO 2 – p26 (see extract)	26		<p>SGO 1 – Urban Focus</p> <p>SGO 2 – Disbursed Growth</p> <p>SGO 3 Blended Strategy (preferred)</p>	<p><b>Spatial Growth Options</b></p> <p>The Regulation 18 (b) Local Plan sets out alternatives considered by Medway Council for the spatial distribution of future growth as Spatial Growth Options (SGO), where three SGOs have been assessed in the Interim Sustainability Appraisal (ISA). Medway Council’s preferred Option, SGO 3, blends regeneration, brownfield and greenfield development.</p> <p>Homes England broadly supports the overall assessment methodology of the Spatial Growth Options that has been undertaken by the Council.</p> <p>Homes England supports the ‘brownfield first’ approach taken by Medway Council which is a key aspect of the current NPPF (para. 123) and one that the Government proposes to reinforce by way of the introduction of a presumption in favour of brownfield development in the revised NPPF (at para. 124(c)). Lodge Hill Camp is a previously developed, brownfield site. It is in a sustainable, rural location and represents a key opportunity to make efficient use of land for a range of mixes including residential. It will assist Medway in meeting its development needs whilst also making a positive contribution to the vibrancy and sustainability of Chattenden and the wider Hoo Peninsula. The overall aims and objectives of the draft Reg 18(b) Local Plan are broadly supported as these align with the objectives found in Homes England’s Strategic Plan (2023 to 2028).</p> <p><b>SGO 3</b></p> <p>Homes England requests that the edit below is incorporated which would include HHH1, as a brownfield site:</p> <p><i>‘3.1.4 SGO 3 blends regeneration, <u>brownfield</u> and greenfield development, and is the indicative preferred option. There is a ‘brownfield first’ focus with regeneration in urban centres and waterfront locations, complemented by range of sites in suburban and rural areas. About half of the development would be on brownfield land...’</i></p> <p><b>Site Specific Response</b></p> <p>Chapter 3 cross refers to, and is informed by, the Interim Sustainability Statement. Specific comments on this are set out below.</p> <p><b>Site HHH1 (Lodge Hill Camp)</b></p> <p>It has been noted that the Lodge Hill Camp site (Call for sites reference HHH1) is not currently shown as an Indicative Preferred development Site in the Interim Sustainability Statement which is a change from its inclusion in Medway Council’s October 2023 Land Availability Assessment. The Council will recall that the site was submitted to the Medway SLAA in 2019 and most recently was submitted to the Medway Council Call for Sites exercise in October 2023.</p> <p>Homes England would welcome the inclusion and recognition of this brownfield site as still being capable of delivering a mixed-use scheme that could include employment, residential, education and community uses and therefore Homes England requests that the Lodge Hill Camp site (HHH1) be re-considered for inclusion as a preferred employment-led development site. The site is currently used on a meanwhile basis by a number of public sector agencies for training purposes in keeping with its established training use, although it is available for redevelopment. Homes England’s further detailed comments on the Interim Sustainability Appraisal reasons for selection/rejection of HHH1 are set out below.</p> <ul style="list-style-type: none"> <li>Close proximity to SSSI and Ancient Woodland - HHH1 is entirely located outside of the Chattenden Woods and Lodge Hill SSSI. Proximity to the SSSI should not prevent appropriate land uses/redevelopment coming forward which can be sympathetically designed to minimise impacts such as those relating to noise, lighting and/or odour.</li> </ul>

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
						<ul style="list-style-type: none"> <li>Potential loss of Best and Most Versatile (BMV) agricultural land – HHH1 is brownfield with existing buildings and hardstanding on the site. It has been in various military uses since the 1870s, so has not been in agricultural use for over 150 years, with no potential for agricultural use in future. Agricultural use of the site would not be consistent with the pattern of built development in Chattenden and given the extensive built development and hardstanding on the site, along with the need for some remediation, agricultural use would not be viable. Therefore, whilst it may fall within a wider classification of Grade 3 Agricultural Land according to the Natural England Regional classifications, the classification is not relevant to Lodge Hill Camp and should not in any way influence its future redevelopment.</li> <li>Coalescence between settlements – HHH1 has clear site boundaries such as roads and woodland and is currently occupied by buildings and hardstanding that are already well screened. Redevelopment of the same footprint would not result in any coalescence between settlements.</li> <li>Beyond reasonable walking distance to current public transport services – the closest bus stop to HHH1 is around 750m from the site on Lodge Hill Lane. Whilst this is greater than the desirable 400m, it is not a significant distance for walking to employment or other uses. The appraisal should take into account the potential for the bus service to be extended and enhanced if the site was to be redeveloped (acknowledging that in previous Local Plan documents, there had been reference to upgrades along Chattenden Lane). The context of nearby preferred sites for new homes that will benefit from Active travel routes and potential public transport improvements in the vicinity should also be a key consideration. The site already benefits from an existing access onto the public highway and does also benefit from utilities/services infrastructure that could be utilised when the site is redeveloped.</li> </ul> <p>Homes England reiterates its position that Lodge Hill Camp offers an excellent opportunity to make use of a potentially sustainable brownfield site to provide new mixed-use opportunities for the local community, in close proximity to new homes at Chattenden Barracks, ensuring a good balance of jobs and homes.</p>
	4	Natural Environment	29-59			
2882 2908	Q.1	<u>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?</u>	31	Climate Change	Policy S1: Planning for Climate Change	<p>Homes England recognises the importance of tackling climate change and sets out in its Strategic Plan the need to increase its focus on enabling sustainable homes and places, maximising positive contributions to the natural environment and minimising environmental impact. Homes England is working with its partners to adapt to changes to building regulations and the introduction of the Future Homes Standard which will be critical in reducing carbon emissions from homes.</p> <p>Going beyond the requirements of Building Regulations could be an ambition for Medway Council, but any such requirements need to be fully evidenced with consideration of different options and their benefits alongside consideration of viability and cost implications and the deliverability/practicality for all types of development sites. The Ministerial Statement made on 13<sup>th</sup> December 2023 (UIN HCWS123) clarifies that to be sound, local plans must be consistent with national policy and that any policies that go beyond current or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures that development remains viable. The statement also clarifies that where plan policies go beyond current or planned building regulations, those policies should be applied flexibly to decisions on planning applications.</p> <p>The Local Plan evidence base should consider elements such as emissions, water efficiency targets, renewable energy schemes, Green Infrastructure provision and Active Travel as these all have a role to play in reducing climate change. Several emerging Local Plan policies are therefore likely to be addressing climate change. Consideration should also be given to requirements for monitoring of carbon emissions, environmental impact and resilience to climate change across the life of new homes and buildings.</p>
2885 2908	Q.2	<u>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?</u>	33	BNG	Policy S2: Conservation and Enhancement of the Natural Environment	<p>Homes England recognises that draft Policy S2 requires that development proposals demonstrate that significant harm to biodiversity can be avoided; if not, then adequately mitigated, or as a last resort, compensated. This policy requirement aligns with the policy wording of the NPPF and reflects the ‘mitigation hierarchy’ and is therefore supported.</p> <p>Homes England considers that it is desirable that developments should support and help promote the conservation, enhancement and restoration of biodiversity across the plan area. This is relevant to Lodge Hill Camp where the delivery of future BNG could provide connectivity between non-designated habitats and the adjacent SSSI, as well as providing improved corridors for protected and/or notable species including bats, nightingale and invertebrates.</p> <p>Homes England welcomes the need for development proposals to seek opportunities to strengthen biodiversity networks (including notified SSSIs) and in parallel support the conservation objectives of associated biodiversity site management plans. Homes England also supports the premise that development proposals, including at Chattenden Barracks and Lodge Hill Camp, contribute to strategic environmental management</p>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
						<p>programmes to ensure an effective mitigation approach in particularly sensitive locations, such as in close proximity to designated sites, in this case, the Chattenden Woods &amp; Lodge Hill SSSI.</p> <p>Draft Policy S2 promotes the conservation, restoration and enhancement of priority habitats and species and seeks opportunities to deliver net gains for biodiversity. Homes England supports the Government’s statutory requirement for 10% in BNG.</p> <p>Should the Council seek to require more than the statutory minimum of 10%, this approach would need to be fully evidenced, taking into account implications on site deliverability, practicality and viability for a range of site typologies, from constrained brownfield sites to larger greenfield sites.</p>
2886 2908	Q.3	<u>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</u>	36	<b>SAMMS</b>	<u>Policy S3: North Kent Estuary and Marshes designated sites</u>	Homes England recognises the presence of internationally important birdlife of the Thames Estuary and Marshes SPA and Ramsar, Medway Estuary and Marshes SPA and Ramsar, and the Swale Estuary SPA and Ramsar sites; and acknowledges the requirement to address potential cumulative development and recreational pressures on these sites. Homes England therefore supports the tariff-based approach applied to development within 6km of the coastal European sites that has, through the Birdwise SAMMS scheme, been demonstrated to be successful and effective in managing increasing recreational pressure along the coastline. The tariff-based approach provides a clear and easily understood solution to the pressures of increasing population for developers and stakeholders alike. The proposed development at Lodge Hill Camp would be compliant with this policy in relation to SAMMS contributions if residential was included within the mix of uses. Contributions towards SAMMS from residential developments within the 6km zone provides sufficient certainty that the additional recreational pressures from schemes in combination would avoid Likely Significant Effects on the European sites in question.
2887 2908	Q.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?	39	<b>Landscapes of local value</b>	<u>Policy S4: Landscape protection and enhancement</u>	<p>It is noted that the latest Landscape Character Assessment (LCA) (2024) that Medway are seeking comments on will provide an evidence base to inform LVIA work (scoping and the individual assessments).</p> <p>Homes England notes that Chattenden Barracks is given the Landscape Character Type ‘Urban’ in Figure 6.1 of the LCA, whereas Lodge Hill Camp appears to be classified as ‘Wooded Hills and Ridges’. Given the extent of hardstanding and existing buildings on the Lodge Hill Camp site, the site is considered to be ‘Urban’. The buildings at Lodge Hill Camp are well contained by woodland at two cardinal directions, but the site itself is not distinctive and reflects its previous use which is more urban in nature.</p> <p>Any planning application for land at Lodge Hill Camp will be supported by a Landscape and Visual Impact Assessment (LVIA) and will consider opportunities for enhancements to Green Infrastructure and opportunities to create important green links. The LVIA will be based on viewpoints agreed with Medway Council’s Landscape Officer.</p> <p>It is noted that the LCA identifies Chattenden Barracks and Lodge Hill Camp as both being classified as Grade 3 Agricultural land (the mapping does not show the subdivision of Grade 3 land). Whilst this is consistent with the Natural England Regional Agricultural Land Classification Mapping, it is noted that these maps represent a generalised pattern of land classification and should not be applied to individual sites. It is important to reiterate that Chattenden Barracks and Lodge Hill Camp are both previously developed sites that have been in various military uses from the 1870s onwards and it is understood will not have been in agricultural use for at least 140 years. Any agricultural use of these sites would not be consistent with the pattern of built development in this part of Chattenden and given the extensive built development and hardstanding on these sites, along with the need for some remediation, agricultural use would not be viable. The Grade 3 land use should not therefore be used as a criterion to consider the appropriateness of the sites for the provision of new homes and employment generating uses.</p>
2889 2908	Q.5	Do you agree that the Council should promote Natural England’s Green Infrastructure Framework standards in the Medway Local Plan policy?	42	<b>Natural England’s Green Infrastructure Framework standards</b>	<u>Policy S5: Securing Strong Green and Blue Infrastructure</u>	<p>Homes England is supportive of the Local Plan’s objectives around the connectiveness of existing and proposed green infrastructure on the Hoo Peninsula and beyond, the integration of new development into the landscape and the improvement of access where appropriate and achievable, acknowledging access needs to be balanced with protection of the natural environment. Homes England is aware of and is supportive of strategic green infrastructure proposals such as those at Deangate Community Parkland that can become anchors for green networks to ensure Green Infrastructure (GI) resilience on the Peninsula into the future.</p> <p>Homes England supports the principle of encouraging developments to work towards Natural England’s Green Infrastructure Framework Standards. The standards have a useful role to play in assisting local authorities and developers in considering GI early on and ensuring that opportunities for GI are maximised. It may be more appropriate for the Local Plan to reference the standards as guidance to assist developers and other stakeholders in developing their GI strategies rather than duplicating the standards. It is also important to recognise that it may not be possible for</p>

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
						<p>all sites, particularly brownfield or constrained sites to meet all of the standards and there should be sufficient flexibility to address site specific circumstances.</p> <p>Homes England will look to engage with <i>Making Space for Nature in Kent and Medway</i> to input into the development of Local Nature Recovery Strategy priorities and measures with a particular focus on the role that Homes England's land at Lodge Hill can play in a wider Hoo Peninsula strategy.</p>
2890 2908	Q.6	<p><u>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?</u></p>	42	<b>Green and Blue Infrastructure Framework</b>	<p><u>Repeated: Policy S5: Securing Strong Green and Blue Infrastructure</u></p>	<p>Homes England broadly supports the general strategic approach being taken to the protection of and provision of green and blue infrastructure across Medway as set out in the draft Medway Green and Blue Infrastructure Framework document (July 2024) and proposed Policy S5. Homes England places significant importance on the retention and protection of green infrastructure assets as part of its day-to-day management of the Lodge Hill estate and will look at GI enhancement opportunities as part of emerging development proposals. These natural assets will be an important consideration for the design process at Lodge Hill Camp and will seek to maximise opportunities to create wider green infrastructure connections.</p> <p>Homes England supports the strategic priorities set out in the Framework document. The following are particularly important in developing proposals for the Lodge Hill Camp site:</p> <ul style="list-style-type: none"> <li>• Protect, enhance and improve the core biodiversity sites;</li> <li>• Support increased active travel;</li> <li>• Prioritise improving access to greenspace;</li> <li>• New development should try to incorporate SuDS schemes that are integral to the green infrastructure;</li> <li>• Link people and nature;</li> <li>• Provide access to green infrastructure close to home;</li> <li>• Support people in taking healthy exercise; and</li> <li>• Strengthen landscape character.</li> </ul> <p>The identified key priorities for the Hoo Peninsula as set out in the draft Medway Green and Blue Infrastructure Framework will be used to guide development of the proposals for Lodge Hill Camp. Of particular importance to the scheme are the following priorities/opportunities:</p> <ul style="list-style-type: none"> <li>• Promote habitat resilience in relation to SSSI notified features – Homes England's commitment to active management of the Chattenden Woods and Lodge Hill SSSI (that sitting within HE's ownership) to support the resilience of notified features along with the potential to create habitat enhancements as part of proposals for Lodge Hill Camp could play a key role in working towards this priority.</li> <li>• Homes England recognises the role of available greenspace in absorbing recreational pressure to designated sites and will support, as part of the proposals for Lodge Hill Camp, informal managed recreational access to Deangate Community Parkland along with supporting opportunities to create access to Deangate from the existing and proposed residential areas in the vicinity. Homes England also recognises the important role of developing sensitively designed and controlled access to the surrounding Chattenden Woods and Lodge Hill SSSI where sensitive landscape works associated to the potential provision of controlled access could actually result in enhancements to the wider SSSI. Sensitively designed green networks have a role to play in encouraging pedestrian access to certain areas whilst directing people away from the most sensitive areas. Managed access would benefit new occupiers/people working at Lodge Hill Camp as well as new residents.</li> <li>• Better access to existing greenspace. Should mixed use development at Lodge Hill Camp include an element of residential development alongside employment, new residents as well as people working at Lodge Hill Camp could benefit from improvements and public access to the former military Recreation Ground north of the Chattenden Estate.</li> <li>• Develop promoted walking trails and seek greenways and traffic free routes where possible. Options for such routes in the vicinity of Lodge Hill Camp will be explored as part of the development of future masterplanning proposals for the site.</li> <li>• Improve the accessibility of cultural heritage sites through opportunities for interpretation. Homes England will assess the feasibility around access to existing heritage features across the wider Lodge Hill estate for the enjoyment of existing and future residents.</li> <li>• New green infrastructure should integrate SuDs into the design of space rather than as a separate feature. Where appropriate the Lodge Hill Camp scheme design will seek to create multi-functional sustainable drainage with biodiversity and open space benefits. As part of any work to identify appropriate SuDs features on the site, opportunities for swales as well as dry storage ponds would be investigated.</li> </ul>
2893		<b>Policies without Questions specifically related</b>		<b>Kent Downs AONB</b>	<u>Policy S6: Kent Downs Area of</u>	Homes England's comments on proposed Policy S6 are made in the context of the Lodge Hill site. Land at Lodge Hill is located over 5km north east from the Kent Downs AONB at its nearest point. Views in the direction of Lodge Hill from the Kent Downs AONB are screened by multiple layers of



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
					<u>Outstanding Natural Beauty National Landscape</u>	tree cover and undulation in terrain, including Great Chattenden Wood and Round Top Hill. Draft Zones of Theoretical Visibility models have shown no intervisibility between the proposed development and the Kent Downs AONB, hence it is considered unlikely that proposed development would have any likely visual influence on the AONB or its setting. This will be confirmed once Landscape and Visual Impact Assessment work for Lodge Hill Camp is progressed.
2895				<b>Flood and Water Management</b>	<u>Policy DM1: Flood and Water Management</u>	Homes England supports the broad principles of proposed Policy DM1 around promoting water efficiency measures and protecting and enhancing water quality and to comply with this policy will prepare a comprehensive Flood Risk Assessment and Outline Drainage Strategy to support redevelopment proposals. Homes England will work closely with the Lead Local Flood Authority (LLFA) in developing its proposals for drainage of the site. Surface water will be managed on site via a range of sustainable drainage techniques in accordance with the preferred drainage hierarchy. An outline surface water drainage strategy will accompany any planning application for Lodge Hill Camp. Sustainable drainage features on site will be designed to maximise benefits associated with biodiversity, integration with green infrastructure and creating multi-functional areas.
2898				<b>Contaminated Land</b>	<u>Policy DM2: Contaminated Land</u>	<p>Proposed Policy DM2: Contaminated Land accords with national guidance, but may benefit from additional clarity regarding the timing of investigations. It states that these will be required ‘<i>in conjunction with relevant development proposals</i>’. It is assumed that ‘relevant development proposals’ could be either with an outline or full application or in other cases it may be more appropriate to be conditioned.</p> <p>Following the recommendations from a Desk Based Phase 1 Land Quality Assessment (LQA), phase 2 site investigations were carried out at Lodge Hill Camp. These considered contaminated land and ground conditions and concluded that remediation measures appropriate to protecting end users of the site would ensure that the site is appropriate for re-use. There are no known issues that impact the suitability of the site for redevelopment for the land uses proposed. Remediation works associated with redevelopment will ensure that the site is safe for future occupiers/residents.</p> <p>Due to Lodge Hill being historically a target for bombing during the inter-war periods and in view of the legacy of past military usage, to facilitate the deliverability of Lodge Hill Camp into the future, the site is subject to assessment in relation to land contamination (including Ordnance). Ongoing works around ordnance investigation and future remediation will enable redevelopment to be brought forward for a range of uses.</p>
2901				<b>Air Quality</b>	<u>Policy DM3: Air Quality</u>	<p>Homes England broadly supports the principles of draft Air Quality - Policy DM3. However, the following wording changes are required for clarity:</p> <ol style="list-style-type: none"><li>1. The policy refers to “the introduction of low Nitrous Oxide (NO2) boilers”. This should state “low nitrogen oxides (NOx) boilers” instead.</li><li>2. The final sentence reads “Development with the potential for impacts resulting from air quality, such as from traffic, industrial emissions, on the ecology of designated sites will be required to demonstrate avoidance or appropriate mitigation.” This should rather state: “Development with the potential to cause air quality impacts as a result of emissions to air, such as traffic or industrial emissions, on the ecology of designated sites will be required to demonstrate avoidance or appropriate mitigation.”</li></ol> <p>In addition, we suggest the following minor wording changes to the draft supporting text:</p> <p>“4.10.2 Large, potentially polluting developments, which generate a significant amount of vehicle movements, have the potential to significantly affect air quality. <del>Therefore, and air pollution quality</del> impact assessments <u>must be completed</u>, and mitigation measures <u>provided</u>, in accordance with local air quality guidance, <del>must be completed</del>.”</p> <p>“4.10.3 The impact of any proposals on ambient air quality will also be important where the development could in itself result in the designation of Air Quality Management Areas or conflict <del>with</del> any Air Quality Action Plans declared by the Council. In appropriate circumstances, air quality impact <del>assessments studies through</del> using air dispersions <del>modelling and appropriate</del> modelling will be made legally binding through the use of planning conditions or planning obligations (S.106 agreements).”</p> <p>“4.10.4 The use of renewable and alternative energy sources; and integrated transport strategies, will all help to improve air quality and also <del>contributing</del> to reducing CO<sub>2</sub> emissions. However, biomass burning can pose challenges to air quality. A shift towards more biomass burning in urban areas of Medway could have significant impacts on air quality and public health if only the potential climate change benefits are considered. There could be conflict with policies relating to energy, and therefore very careful consideration of the air quality impacts relating to proposed development of biomass burning will be required.”</p>

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
2904				Noise and Light Pollution	<u>Policy DM4: Noise and Light Pollution</u>	<p>Homes England recognises the importance of ensuring that noise and light pollution are minimised and that adequate mitigation is incorporated into development proposals (where required). Any such mitigation that might be required at Lodge Hill Camp could include appropriate design, inclusion of buffers/dark corridors and development of a sensitive lighting strategy to avoid light spillage that may impact on sensitive receptors. Further environmental work would inform the detail of any mitigation strategy.</p> <p>Draft Policy DM4 would benefit from some re-wording for clarification. The reference to noise should be removed from the third bullet point “Where appropriate, technology and efficiency, such as motion sensors and LED lights, have been incorporated into design to reduce levels of noise and light” as this is only relevant to lighting.</p> <p>The sentence: “Planned development, either through an extant planning permission or allocated in the Local Plan, must be considered” would benefit from further clarity, for instance whether it relates to the requirement for LVIA in the previous paragraph, or if it is stating that Policy DM4 is applicable to all planned development.</p>
	5	Built Environment	60-76			
2913		Policies without Questions specifically related		High Quality Design	<u>Policy T1: Promoting High Quality Design</u>	<p>Homes England broadly supports proposed Policy T1 as it seeks the high-quality design of new development that makes a positive contribution and responds appropriately to the character and appearance of its surroundings which reflects Homes England’s strategic objectives. It is noted and acknowledged that this policy predicates compliance with the principles of nationally recognised standards and Building Regulations so far as practicable.</p> <p>To manifest the early thinking around design and sustainability, a draft Vision Document has been prepared and will be regularly updated, to reflect emerging technical detail and design inputs to inform a holistic approach to future masterplanning. Account will also be taken of emerging draft policy, supplementary planning information and Medway Council and stakeholder engagement.</p> <p>Homes England’s Building for a Healthy Life criteria provide a national policy-based framework for high quality design and placemaking, focusing on the three topics of ‘Integrated Neighbourhoods’, ‘Distinctive Places’ and Streets for All’. 12 subheadings contain coding on crucial topics, which will guide development of proposals for Lodge Hill Camp.</p> <p>Lodge Hill Camp provides the opportunity for a mix of uses, given its sheltered location and brownfield nature. To create a vibrant and attractive neighbourhood, a landscape led approach could be implemented, complemented by sympathetic massing and building design that respects the local character and amenity.</p> <p>By architecturally referencing Medway’s varied employment and mixed use buildings, a responsive and sympathetic approach can be taken to buildings on Lodge Hill Camp. Non-residential buildings will be designed for flexibility, allowing the built form and uses to shift with changing employment needs whilst reflecting Medway’s iconic heritage assets and the natural surroundings of the site.</p> <p>Connectivity will be at the heart of Lodge Hill Camp’s offer, with direct integration into the existing and emerging active travel network across Hoo and Medway. Legible routes within the neighbourhood will complement this to encourage active travel.</p> <p>These design principles have already sought to underpin the early visioning around the design of Lodge Hill Camp and this early work will continue to inform the evolution of the emerging masterplan proposals for Lodge Hill Camp alongside inputs from the existing community, key stakeholder groups and statutory stakeholders through engagement.</p> <p>To ensure high quality design at Lodge Hill Camp, there is opportunity for development to respond to the rich natural context, and the existing urban fabric and architectural styles found in Chattenden and the Hoo Peninsula.</p> <p>Homes England would be keen to understand how the positive work presented within the previous iterations of the Hoo Development Framework will be taken forward into future design policy / guidance for applicants / consultees particularly on unique sites such as Lodge Hill Camp being brownfield but also located in close proximity to the Chattenden Woods and Lodge Hill SSSI.</p> <p>Where at all possible, Homes England will look to integrate the key principles set out in its vision and strategic framework for design and sustainability.</p>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
2914				<b>Housing Design</b>	<u>Policy DM5: Housing Design</u>	<p>Draft Policy DM5: Housing Design aims to provide good living conditions for future occupants of housing developments as would be the case at Lodge Hill Camp if residential use does forms part of the mixed-use development. This could include high quality, robust, adaptable homes, which are inclusive and include functional spaces that respond to changing resident needs throughout their lives and support the undertaking of necessary day to day activities.</p> <p>As part of Homes England’s housing delivery, there is a commitment to adherence to Government Standards including the Nationally Described Space Standards (NDDS) and other nationally set requirements which should be the starting point for housing design requirements. Beyond this, Building for a Healthy Life’s criteria on ‘Homes for Everyone’ will be used to guide development proposals in providing ‘a mix of housing types and tenures that suit the needs of the local community’.</p> <p>It is noted the policy wording goes beyond National standards and if this approach is taken forward this should be robustly evidenced and viability and deliverability tested by the Council to ensure the future policy wording is appropriate.</p>
2916				<b>Sustainable Design and Construction</b>	<u>Policy DM6: Sustainable Design and Construction</u>	<p>Homes England is generally supportive of the draft Policy DM6. It is however noted that the requirement for non-residential development to demonstrate how they will meet a very good BREEAM standard for water and energy overlaps with Building Regulation requirements and therefore it is not considered necessary to include this requirement.</p> <p>Homes England will aim to ensure that sustainable design and construction methods are used during the development and design process. The Council’s requirement for new development to contribute to ‘reducing the impact of climate change and to meeting carbon net zero emissions’ is also supported and sustainable design will be a key priority to be incorporated into any development proposal at Lodge Hill Camp.</p> <p>The proposals for Lodge Hill Camp would be developed with the central themes of the NPPF in mind which focus upon ‘place making, sustainable design and sustainability’. Homes England intends to continue to develop the proposals with these key themes in mind by focussing on achieving a well-designed place that promotes sustainable transport and responds to the challenges of climate change.</p> <p>In summary it is noted that Homes England is uniquely placed to bring forward sustainable development at both Chattenden Barracks and Lodge Hill Camp.</p>
2918				<b>Historic Environment</b>	<u>Policy S8: Historic Environment</u>	<p>Homes England is generally supportive of the draft Policy S8 and supporting text in relation to the historic environment. The Policy wording clearly outlines Medway Council’s commitment to the conservation, enhancement and enjoyment of the historic environment. Whilst no historical features of note are present at Lodge Hill Camp, there are potential opportunities for the enhancement of land located in the setting of prominent heritage features located on other parts of the Lodge Hill Estate as part of a wider holistic design approach. Any such opportunities identified will be worked through in liaison with Medway Council and Historic England.</p>
2920				<b>Heritage Assets</b>	<u>Policy DM9: Heritage Assets</u>	<p>The principle of draft Policy DM9 – Heritage Assets is supported. The early visioning for Lodge Hill Camp is not considered to negatively impact (nor result in the loss of) any above ground heritage assets as existing historical features are situated in areas of the wider Lodge Hill estate located a fair distance away from the proposed development areas.</p> <p>A degree of archaeological investigation has already been undertaken on the wider Lodge Hill site and any requirements for further investigation at Lodge Hill Camp would be discussed with Kent County Council Archaeology.</p> <p>Notwithstanding the above positions, to comply with draft Policy DM9, a desk-based Heritage Statement would be prepared to support any forthcoming planning application at Lodge Hill Camp. This would set out details from the Historic Environment Record and consider the historical development of the site.</p> <p>Consideration should be given to incorporating draft Policy DM11 with draft Policy DM9 as Policy DM9 is titled ‘Heritage Assets’. Such assets include built heritage, archaeological remains and historic landscapes.</p>
2921		<b>Policies without Questions specifically related</b>		<b>Scheduled Monuments and Archaeological Sites</b>	<u>Policy DM11: Scheduled Monuments and Archaeological Sites</u>	<p>The principle of draft Policy DM11 - Scheduled Monuments and Archaeological Sites is supported. As noted above, consideration should be given to incorporating this policy with Policy DM9.</p>

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
	6	Housing	77-103			
2922 2933			77	Housing Numbers	Paragraph 6.1.2	The Spatial Growth Options set out in Chapter 3 of the draft Local Plan seek to meet the scale of housing growth in Medway by 2041. Medway Council continues to update its evidence base and assessment work to inform the final content of the Local Plan. The draft policies presented for consultation sets out the preferred approach and the current evidence base. Homes England welcomes the further work being undertaken and has previously provided a draft Vision document for the Lodge Hill site that the Council can use to inform the next stages of the Plan, in particular the site-specific policies linked to the draft allocations. The draft Vision document, underpinned by a series of technical assessments, demonstrates that delivery of new homes at Lodge Hill is achievable in the short term to meet local development needs as required by paragraph 69 of the NPPF. This includes the potential for new homes at Lodge Hill Camp as part of a mixed use redevelopment scheme. For sight of the full response in relation to the housing chapter please refer to Homes England representations in relation to Homes England Chattenden Barracks site (part of wider Lodge Hill estate with a draft allocation for housing).
2922 2933	Q.10	Do you think this policy provides effective guidance on the required housing mix in Medway?	79	Housing Mix	Policy T2: Housing Mix	The Viability Assessment proposes a housing mix for all tenures, albeit noting that this document was last updated in 2021 so this data may be out of date. The housing mix is broken down further between market and affordable units and houses/apartments in Table 8.4 Summary of Overall Dwelling Mix taken from the 2021 Local Housing Market Assessment (LHMA). For the Lodge Hill Camp site, early analysis shows that there may be limited demand for private apartments and bungalows, this demonstrates the need for any policy to be flexible to ensure that it can be informed by up-to-date evidence and up to date site specific market evidence. For sight of the full response in relation to the housing chapter please refer to Homes England representations in relation to Homes England Chattenden Barracks site (part of wider Lodge Hill estate with a draft allocation for housing).
2925 2933	Q.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?	82	Affordable Housing	Policy T3: Affordable Housing	Homes England request that greater clarity is provided around this policy as for the case of the Chattenden Barracks site, it is located on the Hoo Peninsula however it is a brownfield site, therefore it is suggested that there is a 'medium' affordable housing requirement set out in the policy too, suitable for a previously developed site of this nature between the 10-30% range. This also applies to any proposed new homes as part of a mixed use redevelopment scheme at Lodge Hill Camp. For sight of the full response in relation to the housing chapter please refer to Homes England representations in relation to Homes England Chattenden Barracks site (part of wider Lodge Hill estate with a draft allocation for housing).
2928 2933	Q.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?	82	Affordable tenure split	Repeated: Policy T3: Affordable Housing	Homes England is broadly supportive of the proposed split for the affordable tenure. However, the appropriate tenure mix will be dependent on the current need at the time of scheme delivery and subject to viability. It may also vary depending on the latest first time buyer or other Government schemes that are available at the time. Lodge Hill Camp provides the opportunity to provide much needed affordable homes in Medway as part of a mixed use scheme, potentially incorporating employment, community and education uses alongside new homes. For sight of the full response in relation to the housing chapter please refer to Homes England representations in relation to Homes England Chattenden Barracks site (part of wider Lodge Hill estate with a draft allocation for housing).



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
2926 2933	Q.13	<u>Do you have any views on the delivery of affordable housing, and the cascade principle? What evidence can you provide to support your views?</u>	82	<b>Affordable delivery &amp; Cascade principle</b>	Repeated: Policy T3: Affordable Housing	Homes England is supportive of the cascade principle for the provision of affordable housing adopted in draft Policy T3 as it appears to build a level of flexibility into planning obligations which could better allow the housing mix to reflect market conditions which is key to ensuring development viability.
2930 2933	Q.15	<u>Do you have any sites you wish to promote for self-build allocation?</u>	99	<b>Self Build</b>	<u>Policy T9: Self-build and Custom Housebuilding</u>	Homes England is supportive of the principle of a small percentage of custom build housing on larger development sites (where this type of delivery is appropriate) in order to ensure that people have greater options when choosing a home and to promote innovative design.
2935				<b>Small Sites and SME Housebuilders</b>	<u>Policy T11: Small Sites and SME Housebuilders</u>	Homes England is generally supportive of the principle of draft Policy T11 which appears to predominantly relate to smaller sites. However, it appears that there are opportunities to sub-divide larger sites as indicated in the policy wording which Medway Council considers could speed up the delivery of homes and includes SME builders as part of an accelerated delivery. Homes England is supportive of a diverse house building market in its Strategic Plan (2023-2028). Therefore, this policy is supported in principle and could apply to new homes at Lodge Hill Camp as part of a mixed use redevelopment scheme incorporating other uses such as employment, education or community.
	<b>7</b>	<b>Economic Development</b>	104-119			
2936		<b>Policies without Questions specifically related</b>		<b>Economic Strategy</b>	<u>Policy S10: Economic Strategy</u>	<p>Homes England is broadly supportive of draft Policy S10: Economic Strategy insofar as the Council will seek to boost Medway’s economic performance, securing a range of jobs for its workforce with a focus on directing principal employment development to the broad locations as set out in policy.</p> <p>Paragraph 7.2.5 of the supporting text notes the “<i>significant potential for the regeneration, and redevelopment, of employment sites on the Hoo Peninsula</i>”. However, this is not reflected in the draft policy which refers to the Hoo Peninsula, and specifically sites at Kingsnorth and Grain, being suitable for larger scale Net Zero Carbon Energy generating uses and port using facilities. The draft policy should be amended so as to ensure that the potential for a full range of employment uses on the Hoo Peninsula can be realised, particularly on brownfield sites, and not just at the sites at Kingsnorth and Grain. Ensuring that there is a suitable portfolio of employment sites of different sizes to meet a variety of economic needs will be important in ensuring that Medway meets its economic aspirations for the area.</p> <p>Homes England supports the potential for employment sites on the Hoo Peninsula and encourages Medway Council to consider the merits of the redevelopment of the Lodge Hill Camp site to contribute to Medway’s employment needs. As Medway Council is in the process of commissioning an updated Employment Land Needs Assessment, its employment land needs cannot yet be confirmed. The Lodge Hill Camp site offers the opportunity to meet emerging needs and is a site that is available and with a landowner who is keen to support development aspirations in the area.</p> <p>There is therefore an opportunity for the Lodge Hill Camp site to be considered as a potential allocation to assist in meeting employment needs on brownfield sites (aligning with Medway Council’s brownfield-first approach as assessed in the Interim Sustainability appraisal and reflected in SGO3), in close proximity to potential allocations for new homes, creating a balance of new homes and job opportunities.</p> <p>The inclusion of Lodge Hill Camp will assist Medway in providing a diverse portfolio of different types and sizes of employment-led sites that are suitable for employment and mixed uses, offering a good range of potential employment locations to be made available to potential new occupiers and businesses looking to invest in Medway and specifically on the Hoo Peninsula.</p> <p>Homes England has noted the success of several employment sites (Medway City Estate and Medway One particularly) that have attracted good quality commercial occupiers and have provided employment opportunities for many local residents. However, there is a need for the LPA to continually identify a new appropriately located supply of employment-led sites to ensure that Medway’s economy remains sustainably robust. From a site specific perspective, bringing forward Lodge Hill Camp for employment-led uses would offer the potential benefit that existing buildings could be redeveloped and/or repurposed avoiding existing buildings in their current form from becoming derelict. Equally, it must be acknowledged that existing buildings on the Camp were (in some cases) bespoke to their ex-military uses but that the precedent set by the existing development cover/massing lends itself to the wholesale redevelopment of the site if that approach better serves incoming occupiers.</p> <p>Ensuring that there are sufficient sites available that provide a wide portfolio of opportunities to meet economic needs in the future will be critical in supporting the area’s economic aspirations. Utilising existing brownfield sites, such as Lodge Hill Camp, is considered to offer an appropriate and suitable solution to ensuring the area’s economic aspirations are met.</p>

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
						<p>In addition to the above, the Council have adopted Medway 2035, which identifies key regeneration opportunities across the area. Whilst the wider Lodge Hill site is not identified as one of the key regeneration areas, of which there are 10 identified, the document does indicate the following:</p> <p><b>“Growing villages - The Hoo Peninsula</b> <i>This rural area comprises a network of villages, strategic employment and infrastructure sites (including energy production and facilities for the importation of energy, fuel and minerals), and a productive agricultural economy, set within a landscape of estuarine marshland, wooded ridges, and farmland. Much of the area is designated of national or international importance for its environmental value. The Hoo Peninsula has a distinctively different character to urban Medway.</i></p> <p><i>We will ensure that services and infrastructure are delivered in support of new housing and jobs. This includes opportunities to boost the economy and the environment. We will support and promote opportunities for visitor and leisure activities sensitive to the area’s environment”.</i></p> <p>Medway 2035, therefore, expressly identifies that the Council will seek opportunities to boost the economy and the environment and support and promote opportunities for visitor and leisure activities. It is considered that the Lodge Hill Camp site could be part of the solution to boost the economy.</p> <p>Therefore, it is considered that there is strong local policy support for the allocation of sites such as Lodge Hill Camp, which could offer significant opportunities for developing the economy of the area.</p>
2939				<b>New Employment Sites</b>	<u>Policy S12: New Employment Sites</u>	<p>The Lodge Hill Camp site (Call for sites reference HHH1) is not currently shown as an Indicative Preferred Site in the Interim Sustainability Appraisal. Homes England would welcome the inclusion and recognition of this site as being capable of delivering a mix of uses that could include employment, residential education and community uses. The site was submitted to the Medway SLAA in 2019 and most recently it was submitted to the Medway Council Call for sites exercise in October 2023. The October 2023 Land Availability Assessment Report recommended that the site be progressed to the next stage. The site was also included within the previous version of the plan (Reg 18) September 2023, and included on the ‘Rural Development Map’.</p> <p>Homes England considers that the site offers an excellent opportunity to make use of brownfield land to provide new employment opportunities for the local community, in close proximity to new homes, ensuring a good balance of jobs and homes. The site could also offer opportunities for local businesses that may need to relocate in order to expand or may need to relocate as a result of redevelopment schemes impacting their existing site.</p> <p>As Medway Council is in the process of updating its Employment Land Needs Assessment, employment allocations cannot be finalised as the amount of land required is not yet known. Therefore, it is considered appropriate to include the Lodge Hill Camp site as an allocation for an employment-led mix of uses. Its inclusion will assist in providing a robust variety of types and sizes of sites in the Hoo Peninsula, which the Council has recognised has significant potential for regeneration for employment use (at paragraph 7.2.5).</p> <p>As explained in relation to Spatial Growth Options and the site-specific response, Homes England requests that the Lodge Hill Camp site (HHH1) be re-considered for inclusion as a preferred employment-led development site. Homes England’s further detailed comments on the Interim Sustainability Appraisal reasons for selection/rejection of HHH1 are set out below.</p> <ul style="list-style-type: none"> <li>• Close proximity to SSSI and Ancient Woodland - HHH1 is located outside of the CWLH SSSI. Proximity to the SSSI should not prevent appropriate land uses/redevelopment which can be sympathetically designed to minimise impacts such as those relating to noise, lighting and/or odour.</li> <li>• Potential loss of BMV agricultural land – HHH1 is brownfield with existing buildings and hardstanding on the site. It has been in various military uses for over 140 years with no potential for agricultural use in future. Agricultural use of the site would not be consistent with the pattern of built development in Chattenden and given the extensive built development and hardstanding on the site, along with the need for some remediation, agricultural use would not be viable. Therefore, whilst it may fall within a wider classification of Grade 3 Agricultural Land according to the Natural England Regional classifications, the classification is not relevant to Lodge Hill Camp and should not in any way influence its future redevelopment.</li> <li>• Coalescence between settlements – HHH1 has clear site boundaries such as roads and woodland and is currently occupied by buildings and hardstanding. The buildings are well screened by woodland and vegetation. Redevelopment of the same footprint would not result in any coalescence between settlements.</li> <li>• Beyond reasonable walking distance to current public transport services – the closest bus stop to HHH1 is around 750m from the site on Lodge Hill Lane. Whilst this is greater than the desirable 400m, it is not a significant distance for walking to employment uses. The appraisal should take into account the potential for the bus service to be extended and enhanced if the site was to be redeveloped (acknowledging that in previous Local Plan documents, there had been reference to upgrades along Chattenden Lane). The context of</li> </ul>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
						nearby preferred sites for new homes that will benefit from Active travel routes and potential public transport improvements in the vicinity should also be a consideration.
2941				<b>Learning and Skills Development</b>	<u>Policy T12: Learning and Skills Development</u>	Policy T12 refers to development of early years, schools and further & higher education facilities. The Policy also states that “ <i>Development that delivers and encourages the creation and expansion of apprenticeship schemes and adult and community education will be supported</i> ”. Lodge Hill Camp offers the potential for such uses and this is consistent with the former military education and training uses on this part of the site which included the historic teaching of ‘specialist’ trades. It is also consistent with current meanwhile uses on site that involve public sector agencies using the site for training purposes. Redevelopment of Lodge Hill Camp offers the opportunity for the creation of apprenticeship schemes as part of new uses and through construction industries as part of a wider mixed-use scheme.
2943				<b>P Tourism, Culture and Visitor Accommodation</b>	<u>Policy T13: Tourism, Culture and Visitor Accommodation</u>	This policy seeks to support and promote tourism development in Medway. Homes England considers that Lodge Hill Camp should be allocated for mixed uses that could include employment, residential, education and community. Such uses could include some visitor facilities associated with cultural heritage or nature and tourism related uses appropriate to the scale and nature of the site. These could be linked to plan to enhance existing Public Rights of Way (and potential extensions to the PROW network), encouraging access to facilities via sustainable travel modes, in accordance with Policy T13.
2945				<b>Supporting Medway’s culture and creative industries</b>	<u>Policy S14: Supporting Medway’s culture and creative industries</u>	This policy seeks to support the growth of Medway’s cultural and creative industries. Homes England considers that Lodge Hill Camp should be allocated for mixed uses that could include employment, residential, education and community. It could be suitable for a range of uses including those associated with cultural/creative industries. There are potential links that could be explored to cultural heritage features relating to the site’s military heritage located elsewhere within the Lodge Hill estate, but there are also opportunities for other local creative industries, making use of a vacant site close to areas proposed for new homes.
2947				<b>Rural Economy</b>	<u>Policy T14: Rural Economy</u>	The vision for Medway’s rural economy is to secure sustainable growth and service provision in rural communities, while seeking to protect and manage the impact on the environment, natural assets and landscapes. The Lodge Hill Camp site could offer opportunities to support the rural economy through the development of a previously developed site, with is located outside of the Chattenden Woods and Lodge Hill SSSI.  Paragraph 7.9.5 states that the plan recognises that “ <i>growth and diversification of farming and horticultural activities may require supporting infrastructure, such as processing, packing and production facilities, within areas such as the Hoo Peninsula</i> ”. This is supported and it is noted that the Lodge Hill Camp site could be suitable for such supporting infrastructure uses.
	8	<b>Retail and Town Centres</b>	120-151			
2951		<b>Policies without Questions specifically related</b>		<b>Town Centres Strategy</b>	<u>Policy S15: Town Centres Strategy</u>	Homes England supports the promotion of a network of centres, but draft Policy S15 should reflect the blended growth strategy preferred in Chapter 3 and acknowledge the potential growth in the Hoo Peninsula as part of that strategy. This would make the policy consistent with Policy S16 in setting the scene for the Hierarchy of Centres where it is acknowledged new centres could come forward to support the anticipated growth.
2955 2961	Q.28	<u>Would provision of a supermarket in Hoo be beneficial to residents to encourage sustainable travel patterns, convenience and sustainable lifestyles?</u>	140	<b>Supermarket provision in Hoo</b>	<u>Policy S22: Hoo Peninsula</u>	Homes England is supportive of new growth for the Hoo Peninsula requiring supporting infrastructure and centres to provide for the needs of new residents to ensure appropriate provision for residents but also support efficiencies and sustainability.  Homes England supports growth in the Hoo Peninsula and the opportunity for future centres, shops and services to support growth in a sustainable way. A new supermarket in an appropriate location as part of this offer would help support the blended growth strategy preferred in Chapter 3. However, Homes England is keen to understand how the feasibility of potential supermarket provision works in relation to the commercial functionality / viability of local centres including that existing at Hoo.
2956 2961	Q29.	Do you agree with the boundaries and retention of these listed local and rural centres?	144	<b>Local and rural centres</b>	<u>Policy DM12: Local and Rural Centres</u>	Homes England supports the inclusion of new local centres and day to day shopping facilities and services in areas of strategic growth in accordance with the blended growth strategy preferred in Chapter 3.  Homes England is interested to understand the timescales for publication of the emerging local retail centre assessment to inform future demand in the area and to inform area specific policies.
2959		<b>Policies without Questions specifically related</b>		<b>Meanwhile Uses</b>	<u>Policy T19: Meanwhile Uses</u>	Whilst meanwhile uses are clearly to be encouraged as Homes England acknowledges that they can inject much needed activity back to vacant sites, it is Homes England’s view that such uses can be managed sufficiently through temporary planning permissions, advertisement consents and permitted development rights. The proposed introduction of the need to submit a Meanwhile Feasibility Study and Strategy to all major development proposals in draft Policy T19 appears to be an unnecessary burden to large scale development proposals. The potential impact of the

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
						policy does not appear to match the intent of this policy and therefore it may be more appropriate if this policy were removed for the reasons set out above.
	9	Transport	152-172			
2962		Policies without Questions specifically related		Vision for Access and Movement in Medway	<a href="#">Vision for Access and Movement in Medway (not policy)</a>	Homes England supports the Vision approach as it is a positive way to tackle traffic congestion and is aligned to the emerging NPPF.  Lodge Hill Camp provides opportunities for a range of uses including employment, community and education which will support a higher level of self-containment to facilitate local level living, thereby reducing car dependency and vehicle trips.
2963				Monitoring and Managing Development	<a href="#">Policy DM15: Monitoring and Managing Development</a>	The proposed method of allocating vehicle trip credits to site allocations based on the Strategic Transport Assessment (STA), identifying a package of mitigation based on this but requiring development proposals to demonstrate a 10% reduction of the trip credit is an innovative policy. However, offering a developer contribution discount could indicate a bias towards a vehicle-based transport mitigation package, rather than promotion of diversion of funding to active travel, public transport or other sustainable transport opportunities. It is therefore suggested that this approach and potential implications are fully considered as part of the Council's work on the Local Plan.  Homes England considers that the approach to the Medway-wide Monitor and Manage Mitigation Strategy will need to be clearly defined in the STA and the Infrastructure Delivery Plan (IDP) to ensure that there is sufficient funding for appropriate and effective multi-modal transport mitigation.  The wording in draft Policy DM15 states that development proposals and allocations in urban centres will be exempt from developer contributions 'due to their accessible location...' The fact that these developments will generate vehicular trips to locations further afield and therefore have an impact of the road infrastructure capacity should be a consideration. In addition, the IDP will be expected to include pedestrian, cycle and public transport infrastructure and bus services, all of which will be used by the occupants of new development in urban centres.  Homes England supports this policy in principle, however it considers that there needs to be a transparent and consistent approach to the application of this policy, so that the level of developer contributions provides sufficient funding for the multi-modal transport interventions that will be included within the IDP. This should form part of the evidence base.
2964				Grain Branch	<a href="#">Policy DM17: Grain Branch</a>	The Policies Map shows safeguarded land for new rail infrastructure, including a station, route alignment and buffer stop zone.  Homes England agrees in principle that a rail upgrade to the Grain Branch could be helpful to the wider delivery of housing and economic growth on the Hoo Peninsula and would remove vehicle trips from the congested road network. However, given the length of time involved in such schemes and the large amount of work to be undertaken and costs involved, this should not delay the Local Plan. Therefore, identifying the land as safeguarded is considered to be appropriate until such time as detailed proposals are in place. The Medway Traffic Model testing will need to reflect the timescales for the delivery of the station and impacts on traffic flows on the Hoo Peninsula road network.
2966				User Hierarchy and Street Design	<a href="#">Policy T25: User Hierarchy and Street Design</a>	Draft Policy T25 reinforces the need for the design of new development to apply the street user hierarchy that prioritises pedestrians and cyclists and facilitates access to public transport. This approach should be at the heart of designing for new development. Homes England support the Government's national guidance in this regard.
2967				Accessibility Standards	<a href="#">Policy T26: Accessibility Standards</a>	Draft Policy T26 is supported as the 15-minute accessibility to services and facilities, and ease of access to bus services is a concept that will help reduce car dependency, and consequently can have a positive impact on addressing traffic congestion and associated environmental impacts. Homes England support the Government's national standards in relation to accessibility.
2968				Transport Assessments, Transport Statements and Travel Plans	<a href="#">Policy DM18: Transport Assessments, Transport Statements and Travel Plans</a>	Draft Policy DM18 is supported as the production of these documents is a basic requirement in support of a planning application for a development proposal. Clarity will be required on the methodology for assessment to ensure a consistent approach.  It is noted that the policy includes the need for development proposals on the Hoo Peninsula to adhere to an Area-wide Travel Plan. Whilst Homes England is aware that the principle of AWTP's have been suggested by Medway Council before, it would be helpful to have some clarity on the methodology and the timescales for the preparation of this Plan.  There will need to be a consistent approach to the implementation, monitoring and review of Travel Plans. Clarity is required on Medway Council's proposals for this.



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
2969 2973	Q.35	Adequate overnight lorry parking would reduce the risk of lorries parking in locations that lack proper facilities and/or cause a nuisance. Are there local shortages for overnight lorry parking in Medway?	170	<b>Overnight lorry parking</b>	<u>Policy DM19: Vehicle Parking</u>	<p>The Council's current vehicle parking standard is set out in Appendix B. The adopted standards date back to 2001, but the 2010 addendum provides flexibility in the application of the standards to reduce parking provision and optimise development density where the development has good transport alternatives and/or has good accessibility to services and facilities. It would be useful to understand if Medway Council monitors the impacts of parking provision within new developments for use in guiding appropriate provision within forthcoming development schemes.</p> <p>The encouragement of electric vehicle car club membership through Travel Plans is supported where a car club is viable, as a car club is a means to reduce car ownership and electric vehicles reduce environmental impacts.</p>
2971		<b>Policies without Questions specifically related</b>		Cycle Parking and Storage	<u>Policy DM20: Cycle Parking and Storage</u>	Overall, draft Policy DM20: Cycle Parking and Storage is supported as it is a means to reduce dependency on cars. Planning applications for residential and non-residential development will be determined in accordance with the adopted cycle parking standard, subject to consideration of site-specific circumstances or material considerations that indicate otherwise. The reference to site-specific circumstances is welcomed.
	10	<b>Health, Communities and Infrastructure</b>	173-193			
2972 2982	Q36.	Are there any core health and wellbeing issues or opportunities missing from the policy?	178	<b>Health and wellbeing</b>	<u>Policy T27: Reducing Health Inequalities and Supporting Health and Wellbeing</u>	Homes England welcomes the Council's draft policy wording that supports development in Medway that provides opportunities for healthy lifestyles, contributes to the creation of healthier communities, and helps reduce health inequalities. Such opportunities should be considered early on during the Concept masterplanning stages of development. Homes England uses Building for a Healthy Life as a guide to ensure that opportunities to encourage healthier lifestyles and healthy communities are embedded in its proposals.
2976		<b>Policies without Questions specifically related</b>		<b>Existing Open Space and Playing Pitches</b>	<u>Policy T28: Existing Open Space and Playing Pitches</u>	Homes England is supportive of draft Policy T28 which aims to protect publicly accessible public open space for future generations. Concept Plan feasibility work around the provision of future public open space is being considered at the current time with the potential to utilise existing open space within the wider Lodge Hill site.
2977 2982	Q.40	The designation of land as Local Green Space allows communities to identify and protect green areas of particular importance to them. The Local Green Space designation should only be used where the green space is: a) in reasonably proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land. Please use the online map to identify a green area for consideration as designated Local Green Space	184	<b>Local Open Greenspaces – identify locations</b>	<u>Policy DM21: New open space and playing pitches</u>	Homes England is generally supportive of the principle of draft Policy DM21 and would aim to ensure the policy standards could be attained as part of any residential development to be brought forward at Lodge Hill Camp. However, it is noted that the accessibility and quantity standards identified in DM21 are not based on the Fields in Trust benchmarks but are based on the standards recommended in the Open Space Assessment (2024). This is referenced at paragraph 10.3.8. Given the differing standards being proposed, it is important that there is flexibility to allow for a different mix of open space typologies that may be better suited to certain types of sites and that there is some flexibility regarding provision depending on the site circumstances. Viability and the need to make good use of sites and use land efficiently should also be a consideration where the proposed standards go beyond the Fields in Trust Standards.
2978		<b>Policies without Questions specifically related</b>		<b>Community and Cultural Facilities</b>	<u>Policy T29: Community and Cultural Facilities</u>	Homes England supports the principles of draft Policy T29 and the importance that it places on community and cultural facilities. Provision of such facilities does however need to be justified in terms of evidence of anticipated demand or proven existing need and it needs to be financially viable. It also needs to be appropriate to the scale of development proposed, linked to the level of demand.

ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
						The future emerging Infrastructure Delivery Plan and associated local plan policy should clearly indicate the Council's reasonable expectations for delivery of community facilities in connection with the Council's preferred development scenario referencing the rationale for the need/demand for that use with underpinning evidence.
2980 2982	Q.42	Do you agree identifying the required infrastructure to support the scale and locations of growth within Medway is the correct approach? Would a 'mini IDP approach' focusing on broad locations and strategic sites be preferred? Or do you have an alternative suggested approach?	191	Mini IDP or other approach to identify infrastructure	Policy S24: Infrastructure Delivery	<p><u>Question response:</u> Homes England agrees in principle with the approach set out in proposed Policy S24, that new development needs to deliver or contribute towards new or improved infrastructure to mitigate its impact, where appropriate. An up to date Infrastructure Delivery Plan (IDP) is key to informing these requirements, although site specific impacts need to be considered to avoid developments having to contribute to existing capacity issues rather than the contribution being proportionate to the level of impact. This will ensure that developer contributions accord with the CIL Regulation tests.</p> <p>The IDP is a critical part of the Medway Local Plan and needs to be comprehensively updated as a priority to inform developer contributions going forward. Some infrastructure requirements are applicable to all of Medway, but there will be some requirements that are more specific to particular areas and could therefore be grouped together in the IDP to reflect the location of the site allocations.</p> <p>The IDP needs to consider all funding options and phasing of infrastructure requirements. As recognised by the policy, input from key stakeholders such as the Primary Health Care Trusts and Utility providers is key in ensuring that requirements are clear and guided by key stakeholders as part of a clear plan for the area. Some infrastructure upgrades have lengthy lead in times, so as much information on phasing as possible will assist providers in planning for these works if not already part of a programme of planned works.</p> <p>Delays with preparation of the IDP should not prevent development from coming forward provided that it can clearly set out and provide mitigation for its impact, either in terms of provision of infrastructure or financial contributions to infrastructure in the form of developer contributions.</p> <p>Homes England welcomes the opportunity to input into the Council's updated viability work.</p> <p><u>Policy response:</u> Homes England supports the broad policy approach to planning obligations as set out in draft Policy S24: Infrastructure Delivery. The reference to national guidance is welcomed as it is important to ensure that all obligations accord with the three tests as set out in the NPPF at paragraph 57:</p> <ul style="list-style-type: none"> <li>Necessary to make the development acceptable in planning terms;</li> <li>Directly related to the development; and</li> <li>Fairly and reasonably related in scale and kind to the development.</li> </ul> <p>The policy makes reference to the sequence of infrastructure provision, with 'onsite delivery of infrastructure ahead of occupation' being the preference. Homes England considers that this should distinguish between different types of infrastructure, as it would not be appropriate to provide all infrastructure ahead of occupation. This could be for technical, funding/viability or practical reasons.</p> <p>Homes England would like to stress the need to ensure that all contributions sought are fully justified and evidence based, with up to date evidence.</p> <p>Homes England welcomes the clarity regarding Medway Council's approach to viability appraisals, specifically the need for an 'open book' appraisal.</p>
	11	Mineral Supply	194-204			
2984				Safeguarding Mineral Resources	Policy T30: Safeguarding Mineral Resources	<p>It is noted that the draft Policies Map – North West identifies an area of land to the north east of Lodge Hill Camp as a 'Minerals Consultation Area', noting that an area in the north of the Lodge Hill former Military Training area and part of the agricultural land to the north of the Training Area is identified as a 'Minerals Safeguarding Area'. Some of this land is designated as SSSI. The Medway Minerals and Waste Topic Paper that forms part of the Local Plan Evidence Base indicates that Minerals Safeguarding Areas (MSAs) have been identified based on areas of known geological deposits of minerals. At paragraph 1.7.2, the Topic Paper states that consideration has been given to the following:</p> <ul style="list-style-type: none"> <li>Areas where the mineral of economic importance is known to exist;</li> <li>Existence of surface development which has caused the minerals to be sterilised; and</li> <li>Allocations for other forms of development in this Plan.</li> </ul>



ID	Q. no.	Chapter / Question	Page no.	Theme	Policy Reference	Representations - Homes England
						<p>Given that part of the MCA/MSA overlaps with SSSI and there does not appear to be any site specific evidence for this designation to the north of Lodge Hill, it is understood that this is likely to be an anomaly on the Policies Map. Homes England requests removal of these designations or that further site specific evidence is provided to justify the designation. It is noted that Homes England made Medway Council Officers aware of this and requested removal of the MSA designation at Lodge Hill in November 2021.</p> <p>Paragraph 1.8.2 of the Topic Paper references previous identification of Areas of Search for sand gravel in the Construction Aggregates Local Plan 1993. The constraints that fed into this assessment are referenced as including SSSIs. It is noted that this was prior to notification of the Chattenden Woods and Lodge Hill SSSI in 2013. Therefore, the MSA should not apply to the SSSI area.</p>