

Representations on behalf of the
Church Commissioners for
England ('CCE') to Medway
Local Plan 2041 Regulation 18,
July 2024

06 September 2024

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1.0 Introduction

- 1.1 On behalf of our client, the Church Commissioners for England ('CCE'), we write to provide formal representations to consultation into the emerging Regulation 18 Medway Local Plan, which runs until 8 September 2024 ('Reg 18 B Plan').
- 1.2 These representations address matters specifically affecting CCE's landholdings in Medway, with the focus on land at the Hoo Peninsula and Kingsnorth.
- 1.3 CCE are part of the Hoo Rural Town Consortium. For the purpose of this consultation, in relation to its land at the Hoo Peninsula, CCE also rely on the representations submitted by Stantec, on behalf of the full Consortium which sets out and supports the Consortium's shared vision for development at Hoo St Werburgh and response to the consultation.
- 1.4 CCE welcome the opportunity to be involved in this consultation. Building on the Autumn 2023 Regulation 18 consultation, the document provides more information on proposed policies and options for a development strategy the potential sites and broad locations that could form allocations for development, to meet growth, in the new Local Plan covering the period up to 2041.
- 1.5 These representations have been structured to align to the chapters of the consultation document. Where responses are provided to the specific consultation questions asked, these are clearly identified. For completeness, a copy of these representations, without the attachments, has also been submitted via Medway's online consultation form.
- 1.6 Comments on **Section 9, Transport** of the Reg 18 B Plan have been prepared by Pell Frischmann, CCE's appointed transport planners, and are at **Appendix 1** of this report.
- 1.7 In overall terms, CCE consider that the Medway Local Plan, which will set land use policy up to 2041, needs to be ambitious, yet fully deliverable. It needs to ensure that the housing and economic needs of the Borough can be met, in full, with clear focus on the most appropriate and sustainable sites.

CCE Landholdings in Medway

- 1.8 CCE manage the historic property assets of the Church of England. Their Strategic Land Portfolio currently covers approximately 3,075 hectares across England. The portfolio consists of land with local plan allocations or sites with planning permission for around 30,000 new homes (of which c9,000 homes would be affordable), and around 7 million sqft of employment floorspace. CCE also has an additional pool of longer-term sites with development potential. CCE's approach to strategic land is to seek to build new, and strengthen existing communities helping to create and sustain vibrant places. The importance of high-quality placemaking and thorough engagement with local authorities, stakeholders and communities is at the heart of this approach. The integration of material Environmental, Social and Governance (ESG) factors into decision making has long been the cornerstone of CCE's investment approach.
- 1.9 CCE has significant landholdings on the Hoo Peninsula, including land to the east of Hoo St Werburgh and at Kingsnorth. CCE's land to the west (Interim Sustainability Appraisal 'SA'/

SLAA ref. HHH22) and east (ref.HHH31) of Ropers Lane at Hoo comprises part of the wider area of land identified as having the potential to grow by up to 10,000 new homes over the next thirty years, as identified in the Council's draft Hoo Development Framework which was published for consultation in 2022. CCE's adjacent land at Kingsnorth (HHH35) further provides the opportunity for sustainable development through the provision of employment land.

- 1.10 In addition, CCE owns landholdings at All Hallows (ref. AS21) and Lower Stoke (ref. AS13), which represent sustainable opportunities for growth in Medway, in addition to the critical mass of development that would be delivered by the Hoo Rural Town.
- 1.11 There are also a number of relatively smaller rural landholdings owned by CCE, these include:
- Mackays Court Farm (Middle Stoke – refs. AS14 and AS16)
 - Land west of the Street (Upper Stoke – ref. AS11)
 - Sharnal Street (ref. HHH28)
 - Burney's and Nord Court Farm (ref. AS29).
- 1.12 These sites, with the exception of Burney's and Nord Court Farm, were submitted to the call for sites process undertaken by the Council in February 2023, to assist in the preparation of its new Local Plan.
- 1.13 Representations were also submitted by CCE to the previous consultation in Autumn 2023 'Medway Local Plan Regulation 18 Consultation – Setting the Direction for Medway 2040'. The submissions have confirmed that the CCE's sites are suitable, available and achievable and therefore deliverable.
- 1.14 The potential development areas are shown on the site plans at Appendix 2.

2.0 Vision and Strategic Objectives

Vision and Objectives

- 2.1 Overall, CCE support the vision and strategic objectives set out in the consultation document. The objectives include:

“To provide for homes of varying types to meet demand in Medway and ensure a cohesive sustainable approach. To deliver high quality energy efficient homes that meet the housing needs of Medway's communities, reflecting the requirement for affordable housing and the range of sizes and types the area needs...”

- 2.2 Allocation and development of CCE's strategic land and smaller rural landholdings in Medway will support the Council in achieving this vision, providing a wide supply of suitable and available sites to meet varying housing needs through the Local Plan period, up to 2041.
- 2.3 Similarly, CCE support the stated ambition for economic growth in Medway, attracting new investment with a 'broad portfolio of employment sites' including 'Grain and Kingsnorth on the Hoo Peninsula have been transformed into thriving economic hubs'. Allocation and development of CCE's land at Kingsnorth will form an important part of achieving this vision. The site represents a logical extension to existing nearby employment and is uniquely positioned adjacent to the CCE's (and that of the Hoo Consortium's) wider landholdings at Hoo Peninsula – to enable the ambitions for achieving sustainable development through co-location of residential and employment use to be realised through the delivery of the wider Hoo Rural Town.
- 2.4 The vision and objectives importantly recognise that development should be of high quality, resilient and supported by the timely provision of infrastructure to facilitate a sustainable and green future. This is fully supported but can only be achieved through creating the critical mass of housing, economic growth and social infrastructure across the wider area.
- 2.5 The vision also emphasises the importance of achieving a significant reduction in carbon emissions, aided by new developments which have high sustainable building standards, which CCE support. The vision notes the importance of delivering improved travel choices and infrastructure to reduce the use of the car across Medway and encourage active travel and public transport offer. CCE agree this should be a central part of Medway's vision as it will be key to accommodating sustainable growth to meet housing and economic needs.

Spatial Development Strategy

- 2.6 To deliver the new growth required, the proposed development strategy for Medway prioritises regeneration, making the best use of previously developed land and directing investment to urban waterfront and centre opportunity areas – at Chatham, Rochester Riverside and Gillingham. Outside of the urban regeneration areas, the Council will also support the expansion of identified suburban neighbourhoods and villages, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.
- 2.7 CCE recognise that, in meeting the identified housing requirement, the Council should look to bring forward urban sites and previously developed land. However, it is also noted that

such sites are often costly to bring forward and can take time to become available to deliver the required housing. Urban sites are also often more suited to flatted developments delivering smaller units which only caters to a small element of housing need locally. These considerations, coupled with Medway's significant housing need, also justify the identification and release of less constrained greenfield sites. CCE therefore support the general approach to spatial development Medway propose in the Reg 18 B Plan – a combination of development of brownfield sites and, utilisation of sustainable greenfield sites.

- 2.8 The Spatial Development strategy refers to the safeguarding of land for the delivery of a passenger rail service at the Hoo Peninsula on CCE's land. A representation on this is provided at Appendix 1, in response to the transport policies, including Draft Policy DM17 Grain Branch. While the principle of the safeguarding land for a future station is understood, CCE **object** to the approach taken in the Reg 18 B Plan which is to safeguard the land without the adjacent land being allocated for development. This would be resolved through the allocation of CCE's land at East of Ropers Lane and at Kingsnorth – the delivery of homes, infrastructure and jobs adjacent to the safeguarded station land would be a sustainable solution, enabling active travel links through from the wider allocation of land at Hoo St Werburgh to a potential future Station.
- 2.9 CCE also object to the extent of land proposed to be safeguarded and, thereby, not permitted for other development. The detailed design work CCE undertook with Medway Council regarding a future station in this location demonstrates that the extent of land proposed to be safeguarded is not necessary. This should therefore be identified more generally and be more flexible, with further details to follow, if and when any proposals for a station come forward.

3.0 Spatial Growth Options

- 3.1 The draft Plan and the Sustainability Appraisal assess three Spatial Growth Options ('SGOs'), these being: 'SGO1 – Urban Focus'; 'SGO2 – Dispersed Growth and, Medway's indicative preferred option 'SGO3 – Blended Strategy'. Comments are provided on each of these strategies in turn below.

'SGO1 – Urban Focus'

- 3.2 SGO1 would seek to maximise development on brownfield sites in urban centres and waterfront sites, benefitting from good transport links and accessible locations, with a focus on increasing density in these urban areas, with some more limited greenfield development.
- 3.3 Whilst national planning policy advocates for the redevelopment of brownfield land to deliver growth, as is rightly identified in the Reg18 B Plan, there are challenges to an approach with a narrow focus on this aim. SGO1 'Urban focus' is unlikely to release sufficient land to plan to meet Medway's housing need, as calculated using the Government's Standard Methodology. The Government's current consultation into the proposed reforms to the National Planning Policy Framework (NPPF) 2024 emphasises the importance of planning to meet the full housing needs. The NPPF consultation clearly states that LPAs will be expected to make all efforts to allocate land in line with their housing need as per the standard method. SGO1 alone would not, therefore, be aligned with the Government's ambitions in this respect.
- 3.4 Secondly, through over reliance on maximising housing numbers on regeneration sites, SGO1 risks compromised design approaches, adverse impact on heritage assets and other constraints, and detriment to surrounding amenities in these locations. Large regeneration sites are often challenging to deliver (cost, time, contamination), meaning they often don't produce the range of housing types required to meet the needs of different groups, in particular family and affordable housing.

'SGO2 – Dispersed Growth'

- 3.5 SGO2 would mean limited land being provided through regeneration, excluding sites such as Chatham Docks and some town centre/waterfront opportunity sites not actively being promoted by landowners. This option involves a much higher release of land on greenfield and Green Belt sites, including the Hoo Peninsula.
- 3.6 The draft Plan asserts that SGO2 *'raises issues of sustainability, as there is likely to be higher reliance on car-based transport, a greater loss of good quality farmland, and wider environmental impacts.'* As set out in CCE's response to Chapter 9 'Transport' at Appendix 1, it is not the case that release of greenfield land will always result in higher reliance on car-based transport. Allocating a critical mass of land in one sustainable location, such as the Hoo Rural Town, including CCE's land at east and west of Ropers Lane, enables sustainable development which is able to provide for and enhance access to public transport and active travel modes for both existing communities and new developments.
- 3.7 In addition, the Plan states *'town centre/waterfront opportunity sites not actively being promoted by land owners'* would be removed from option SGO2. It is not clear from the

consultation documents, or Figure 1 'Spatial Growth Options' what sites are referred to, or whether they are included within SGO1 or SGO3 assumptions. The NPPF (2023) paragraph 69 is clear that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Specific 'deliverable' sites which are 'available now' should be identified for the first five years of adoption and 'developable' sites *'with a reasonable prospect that they will be available and could be viably developed at the point envisaged'* should be identified for the subsequent years of the plan period. If these sites are not being promoted by landowners, it is not clear how the Council could conclude the sites are or have the ability to be available, suitable or achievable – they should therefore not be within any of the growth options.

- 3.8 SGO2 infers that to compensate for the exclusion of these town centre/waterfront sites, a much higher release of land on greenfield sites, including the Hoo Peninsula would be proposed. Whilst small in scale, the diagram at Figure 1 'Spatial Growth Options SGO2' looks to propose release of CCE's land at both east and west of Ropers Lane for residential-led development alongside the land at Kingsnorth for employment, which CCE would fully support. As explained further in the following Section of these representations, this land is sustainable and accessible with no overriding constraints and, therefore the sites present an opportunity for a sustainable extension to the east of the existing settlement of Hoo St Werburgh.

'SGO3 – Blended Strategy'

- 3.9 SGO3 asserts 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, with the remainder on greenfield land.
- 3.10 SGO3 is the Councils' current indicative preferred option. CCE support Medway's recognition within the Reg18 B Plan that the Authority has a high level of housing need and therefore there is a need to consider large and strategic scale development allocations in the Local Plan to address the community's needs for homes, jobs and services.
- 3.11 Importantly, SGO3 would enable the needs of different groups to be met, delivering a range of housing and types across Medway (as would SGO2). This includes much needed family sized, affordable homes with good access to green open space, located in sustainable locations – a typology that is hard to achieve with a spatial strategy focused regeneration of brownfield urban land only. The NPPF (December 2023), paragraph 63 confirms the importance of establishing the need and planning to meet the needs of different groups in the community. The importance of this has been emphasised within the Government's current consultation into the proposed reforms to the NPPF (2024), including emphasising the importance of meeting need for social rent, stating that:
- 3.12 *"Mixed tenure sites can provide a range of benefits including creating diverse communities and supporting timely build out rates and local planning authorities should support their development through their policies and decisions. Mixed tenure sites can include a mixture of ownership and rental tenures, including rented affordable housing and build to rent, as well as housing designed for specific groups such as older people's housing and student accommodation"* (paragraph 69).

- 3.13 The Reg18 B Plan confirms that SGO3 is the basis for the preferred indicative site allocations shown on the Policies Map. The Policies Map identifies strategic scale growth at Hoo St Werburgh, including CCE's land at west of Ropers Lane for 'residential-led', and *part of CCE's land at Kingsnorth (northern and southern parcels only)* for 'non-residential'. CCE support this stated intention to allocate this land to support Medway meet its housing and economic needs. However, and as set in the following Section of these representations, we consider that the full extent of CCE's land either side of Ropers Lane and at Kingsnorth (see Appendices 2 and 3) should be identified for allocation at the Regulation 19 stage. This would ensure Medway is taking the opportunity to prioritise the allocation of sustainable, well planned, residential-led developments with strong links to employment centres and the opportunity to provide much needed infrastructure to support existing and future communities.
- 3.14 Further, as per the response to SGO2, if SGO3 includes town centre/waterfront opportunity sites not currently put forward by landowners as suitable, available or achievable, this should be reviewed by Medway against national planning policy and guidance. If these sites are not found to pass the 'deliverable' or 'developable' tests within the NPPF, there would be a greater need to release additional greenfield land, and it would be logical, in spatial planning terms, to extend the allocation of land to the east of Ropers Lane, particularly if there is an intention to safeguard land for a station.
- 3.15 CCE also support the land at All Hallows being included in the Policies Map as a preferred development site (residential-led). The site has been consistently promoted by CCE. The site represents an additional growth prospect for residential-led development, once development at Hoo St Werburgh is fully progressed and the public transport network established.
- 3.16 In addition, CCE is fully supportive of the Council's identification of Mackays Court Farm (AS14 and AS16), Burneys and Nord Court Farm (ref.AS29) and Land west of the Street (ref. AS11) as indicative preferred sites in the Policies Map, under SGO3. All three sites are entirely within the ownership of CCE and the suitability of these sites is emphasised in the following Section of these representations. CCE's smaller landholding sites accord with the approach at paragraph 70 of the NPPF – that planning policies should identify a sufficient supply and mix of sites – and paragraph 71 which recognises the important contribution that small and medium sites can make to meeting the housing requirement of an area – often being built out relatively quickly.

Summary

- 3.17 Overall, CCE support the principle of Medway's current indicative preferred approach SGO3 'Blended Strategy', in particular CCE is fully supportive of the identification of its landholdings included within the indicative preferred sites for development in the Policies Map. Allocation of these sites will assist the Council in meeting its vision and strategic objectives, in particular sustainable development to meet the varied housing and employment needs of the community.
- 3.18 CCE also support SGO2 on the basis that the option proposes release of more land at the Hoo Peninsula, it would appear, including CCE's land east of Ropers Lane.

- 3.19 Medway will need to assess all the sites in its preferred option against national planning policy and guidance and question whether they fully meet the 'deliverable' and 'developable' tests required for allocation. CCE has full ownership of and has been actively promoting its landholdings in Medway for many years. As set out in the next Section, all of the sites are sustainable and accessible with no overriding constraints.

4.0 Developing a Spatial Strategy – CCE Rural Development Sites

4.1 To achieve the stated vision, strategic objectives and a successful spatial development growth strategy, Medway's new Local Plan will need to ensure that the housing and employment needs of the Borough can be delivered. In doing so, the Council will need to take a pragmatic, but ambitious, approach to a range of development options and allocate the most appropriate and sustainable sites.

4.2 For this reason, CCE consider that land at Hoo St Werburgh, Kingsnorth, Allhallows, land around Stoke and Sharnal Street are suitable for allocation to meet housing and employment needs, both in the short and longer term.

Hoo Peninsula

Hoo Rural Town

4.3 CCE fully support the Council's indication that the Hoo Peninsula is a sustainable and strategic location for residential-led growth in its Reg 18 B Plan. This reflects the proposals in the draft Hoo Development Framework (2022) for significant growth in the form of the 'Hoo Rural Town'.

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

4.5 The support for these proposals is clearly set out in the submission by Stantec prepared for the Consortium, including CCE. These representations will not repeat or seek to reiterate this commentary.

East (HHH31) and West (HHH22) of Ropers Lane

4.6 Within the Hoo Rural Town, CCE own c. 230-hectares of land east and west of Ropers Lane. A Vision Document and Concept Plans (Appendix 3), prepared by Corstophine & Wright ('C&W'), CCE's appointed Master planners, accompany these representations. The documents demonstrate that this land could deliver up to 3,200 homes, with up to 2,300 being delivered in the 'shorter term' as Phase 1. Should the land east and west of Ropers Lane be allocated as promoted by CCE, the residential-led development would be combined with education, employment and retail uses. The development would form a logical

extension to the existing settlement and planned growth in the area, whilst also providing a link between the residential community and the proposed employment area at Kingsnorth.

- 4.7 There is the opportunity to integrate blue and green infrastructure within a landscape-led masterplan, creating an attractive setting for residents which can be further enhanced by maximising views across the existing countryside. The site is well connected to existing transport infrastructure offering the opportunity to create a sustainable development with reduced car need, and would also provide a critical mass to deliver new sustainable transport solutions. The land is unconstrained and, as such, it has the potential to deliver housing early in the Local Plan period.
- 4.8 CCE's proposed Concept Plan (Appendix 3) for this land is presented in two phases, with Phase 1 master planned to enable it to come forward on its own without reliance on Phase 2 to meet open space, infrastructure and highway requirements:
- Phase 1 comprises the development of the western parcel together with some of the parcel to the east, adjacent to Ropers Land and the proposed transport hub. The uses proposed include residential combined with primary and secondary schools, a transport hub and retail use.
 - The Phase 2 plan demonstrates the further potential development of the land to the east of the overhead power cable easement providing additional residential and employment uses. Phase 2 is a longer-term aspiration which will benefit from the existing network of pedestrian and cycle routes and an extension of the primary, secondary and tertiary routes proposed to Phase 1.
- 4.9 The proposed main transport hub is centrally placed to be highly accessible to both phases of new development to make it as effective as possible, while also providing interconnectivity between the residential communities, together with education and employment uses at Kingsnorth. Extending subsequent development to the east of the overhead power cables easement will provide logical uses adjacent to a potential future railway station.
- 4.10 CCE support Medway's conclusion in the Interim Sustainability Appraisal ('SA'), that the land to the west of Ropers Lane 'HHH22' has been 'selected' as a potential residential-led development site. The reason stated is *'The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services'* – this is fully agreed. However, conversely the adjacent land to the east of Ropers Lane 'HHH31' has been 'rejected' for the reason of *'Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking'*. The difference between these two assessments is not explained or justified in the documents. Indeed, Table 6.3 in the Interim SA, which provides the 'RAG' rating summary of the impact of all sites (pre-mitigation) scores the same on all variables for HHH31 and HHH22. Land to the east of Ropers Lane was previously considered suitable as an allocation by Medway and was not considered to lead to coalescence (with what settlement is unclear – in particular given the existence of the Railway line which provides a clear physical separation barrier to the east). Land to the east of Ropers Lane would be highly accessible by foot to the proposed new transport hub, primary school, secondary school, proposed new local shops and the employment area at Kingsnorth.

- 4.11 Both land parcels east and west of Ropers Lane are deliverable and sustainable, available for the delivery of residential-led development. Further, allocation of the eastern parcel provides a particular opportunity for co-located and spatially linked commercial and residential development. The allocation of the land to the east of Ropers Lane would maximise opportunities for access to public transport and active travel infrastructure by concentrating density around Ropers Lane as a key transport and social infrastructure node. It would be illogical to local transport hubs/ social infrastructure and schools etc where not surrounded by a critical mass of population. Given this, CCE strongly request that land east of Ropers Lane at HHH31 should also be included as a proposed housing site allocation.

Kingsnorth (HHH35)

- 4.12 This site is suitable and available for employment use and could accommodate between 157,000sqm & 176,000sqm of floorspace, split between B2, B8 and E uses, delivered in the short term.
- 4.13 CCE support Medway's conclusion in the Interim SA, that the site should be 'selected' for non-residential use given *'The development would help to deliver the vision and the strategic objectives of the new Local Plan'*. Subsequently, CCE support that the Policies Map identifies *part of* CCE's land at Kingsnorth (northern-east and southern parcels only) for 'non-residential' development. However, it is not clear from the SA, the draft Plan or the supporting documents why the adjacent north-western parcel of HH35 (employment zone C, Appendix 3) has been discounted by Medway.
- 4.14 Allocating this additional land (as was envisaged within the Hoo Development Framework 2022, and previous Reg 18A consultation) would enhance the opportunity for sustainable, well planned, comprehensive development in this location. The parcel provides a logical link between the wider Hoo Rural Town (CCE's land east and west of Ropers Lane), and the existing Kingsnorth employment area, it would facilitate sustainable travel routes between existing Hoo, new residents of the rural town, and jobs.
- 4.15 CCE support part of the land at Kingsnorth being identified as a potential employment site but would note that employment zone C is currently not proposed for allocation and that there is no sound reason why it should not be allocated. The land has a key role to play in Medway's economic development strategy, as acknowledged in Reg 18 B Vision.

Other Rural landholdings

- 4.16 CCE's appointed master planners to undertake initial feasibility studies for the smaller rural settlements, all submitted to Medway's February 2023 call for sites process. The sites are in full ownership of CCE and taking into account the individual opportunities and constraints, the following sites are promoted as being suitable for development, including for residential use. However, these should be identified for development in the later stages of the Local Plan following the major development at Hoo St Werburgh.
- 4.17 CCE fully supportive of the Council's identification of the following as indicative preferred sites (Residential-led) in the Policies Map:

1 All Hallows (AS21)

The site presents an opportunity for a sustainable extension to the existing Allhallows settlement. The Interim SA (Table 8.14) 'selects' the site, stating *'the development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services'*.

CCE support the inclusion of site AS21 as a preferred site for residential led development within the draft Local Plan. There is an opportunity to plan comprehensively at Allhallows and this 41.3 ha site has the potential to deliver a phased mixed-use development which includes housing, tourism and leisure, open space and associated infrastructure.

It is considered that additional tourism and leisure use at this site could form an expansion to Kent Coast Holiday Park and assist in supporting the rural economy to raise skills levels and to increase local labour opportunities.

The site is suitable, deliverable and achievable with no overriding constraints and could come forward on a phased basis to allow the delivery of open space and leisure uses at an early stage in the plan process. Development of this site would help to deliver the Vision and Strategic objectives of the new Local Plan

Development of this site would represent a sustainable residential extension to the existing Allhallows settlement to support the existing primary school, local shops and doctor's surgery. However, this would be following the critical mass of development coming forward at Hoo St Werburgh - the site would benefit from the infrastructure delivered as part of the Hoo Rural Town.

Along with the site location plan, an indicative high-level concept plan is provided at Appendix 2, demonstrating how this site could potentially be delivered.

2 Mackays Court Farm (AS14 and AS16)

The site (SA/SLAA ref. AS14 and AS16) totals approximately 3.2 hectares and comprises agricultural land and 5 existing, modern agricultural buildings. Based on a density of 20 dwellings per hectare, it is considered that the site could accommodate up to 50 dwellings at a 70% net developable area to accommodate for open space and biodiversity net gain. The site will be subject to detailed design and further technical assessments which will inform the final layout, mix and scale of development suitable for the site. The Site is located in a sustainable location within 500m of a primary school, a GP Surgery, a church, a convenience store, a pub as well as a Post Office all of which are located in Lower Stoke. The site is also located within 280m of 2 bus stops which are serviced by the 191 and 692, connecting the site to further amenities in nearby Rochester. As such, the indicative preferred sites AS14 and AS16 should be retained in the Pre-Submission Medway Local Plan but identified as developable sites coming forward in the longer term.

3 Land west of the Street, Upper Stoke (AS11)

The site totals approximately 0.15 hectares and is located within the village of Upper Stoke. The site is located directly adjacent to another indicative preferred site (ref. AS12) which has consent for the conversion of the former public house into one dwelling and construction of 4 further dwellings (ref.MC/21/0192). CCE land provides an opportunity to continue the road frontage development along The Street.

It is considered that the site is capable of delivering 4 dwellings, however, this will be confirmed through technical assessments and future detailed design. Retaining the site for allocation in the Pre-Submission Plan, would accord with Paragraph 70a of the NPPF which states that 10% of a Local Planning Authority's housing requirement should be located on smaller sites less than 1 hectare in size. Notwithstanding, the Council have already considered the area a suitable location for development through granting consent for the construction of 4 dwellings associated with application ref. MC/21/0192. Therefore, CCE support the indicative preferred site AS11 being retained in the Regulation 19 Plan.

4 Burneys and Nord Court Farm (AS29)

The site totals approximately 0.25 hectares and is located to the west of Stoke Road. CCE previously submitted a pre-application in May 2023 (ref. PRE/23/1196). The Council concluded that the site could be suitable for residential development given its location on the edge of the village of Lower Stoke. The site is located in a sustainable location and is well related to the village of Lower Stoke which is served by a primary school, a GP Surgery, a church, a convenience store, a pub as well as a Post Office. It is considered that the site could be capable of delivering c. 6 dwellings most likely comprising of semi-detached dwellings taking influence from the existing dwellings on Allhallows Road and Stoke Road.

The site will be subject to further investigation regarding technical matters in due course. Given the site's size, if retained for allocation it would also contribute towards the Council's requirement to deliver 10% of their housing requirement on smaller sites (less than 1 hectare) as required by Paragraph 70a of the NPPF.

4.18 We understand that the Council is yet to formalise residential allocations in the emerging Plan and, as such, CCE propose that the following sites, not currently identified as indicative preferred sites, would be suitable for allocation, in addition to the above sites.

1 Lower Stoke (AS13)

The site (SA/ SLAA ref. AS13) presents an opportunity for a sustainable residential extension comprising around 655 dwellings to the west of the existing settlement, either side of Cuckolds Green Road, to support local shops and services. Depending on the scale of development, social infrastructure could be provided, but this would be dependent on the wider strategy for the surrounding Hoo Peninsula area. As the site is sustainable and accessible with no overriding constraints, there is scope for residential-led mixed-use development and open space.

However, Medway's Interim SA (Table 8.14) 'rejects' the site, stating '*Potential adverse impact on greenspace. Loss of BMV agricultural land. The development could lead to coalescence between settlements. Potential adverse impact on listed building. Beyond reasonable walking distance to current public transport services.*' CCE consider these are matters that could be overcome through a thorough and responsive masterplan approach. Further, it is noted that Medway consider a cluster of sites at Lower/Middle Stoke to be sustainable, as these are identified as preferred development sites (residential-led) in the Policies Map (AS13, AS15, AS16, AS17).

2 Sharnal Street (HHH28)

Whilst the site could be delivered under emerging Policy T11, it would also be suitable for allocation in the emerging local plan and be capable of delivering up to 36 dwellings. The site is located to the west of Sharnal Street and is comprised of 2 plots of land which total approximately 1.45 hectares. The Site is located approximately 1km south east from the centre of the village of High Halstow which is serviced by a pre-school, a primary school, a village hall, a church, a convenience store and a pub. The site is also located approximately 7km from the centre of Rochester which is serviced by a number of schools, shops, GP surgeries, restaurants and 2 train stations. It is in no less of a sustainable location compared to indicative preferred sites AS2 and AS6.

The site is located within 50m of 2 bus stops which are serviced regularly by the number 9,10, 191,193 and 692 routes to Grain and Rochester. For context, indicative preferred sites AS2 and AS6 are located 400m and 80m respectively from a bus stop. Furthermore, a Public Right of Way connects our client's site to the bus stops. No Public Rights of Way or footways currently connect sites AS2 and AS6 to their closest bus stops. As such, our client's site performs better in terms of sustainability when compared to indicative preferred sites AS2 and AS6.

- 4.19 As set out in CCE's response to the Reg 18A consultation (October 2023), delivery of the above sites could be achieved by first (in the short to medium term) expanding Hoo St Werburgh as a rural town for the Peninsula (Phases 1 and 2) and then, in the medium to longer term, growing the existing smaller settlements, including at All Hallows and Stoke. This will help the Council to meet its housing requirement and ensure that development is focused in accessible locations that support and enhance the local community and existing services.

5.0 Natural Environment

Climate Change

- 5.1 CCE support the principle of **Policy S1: Planning for Climate Change**. In particular, Part 1 establishes the importance of 'effective spatial planning and placemaking' to the mitigation and adoption of climate change. Allocation of CCE's strategic sites at east and west of Ropers Lane and Kingsnorth accords, in particular, with the four limbs. Allocation of the full extent of this land will:
- Locate new homes near to proposed supporting services and infrastructure, including education, within the wider Hoo Rural Town;
 - Reduce the need to travel, through co-location of services, including residential and employment land at Kingsnorth;
 - Design for a walking and cycling network across land and wider Town, including enhancement and delivery of sustainable travel solutions linking to existing railway stations and centres; and,
 - Promote public health and wellbeing, through the incorporation of high-quality open space, green and blue infrastructure and leisure facilities.

Conservation and Enhancement

- 5.2 **Policy S2: Conservation and Enhancement of the Natural Environment** requires development proposals to demonstrate their contribution and enhancement of the natural environment and provide a measurable net gain of 10% in biodiversity, in line with the Defra metric. This approach, including the allowance for potential offsite delivery to deliver strategic enhancements, where it can be demonstrated that this is required, is supported.

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?

- 5.3 The view of CCE's appointed ecologist, Ecology Solutions, is that the planning policy in the Reg 18 B Plan is pitched correctly – to ensure compliance with the 10% national legislative standard. For many sites (particularly intensely farmed arable), whilst it may be possible to aim for and indeed achieve more than 10%, this should be explored on a site-by-site basis, rather than written into Policy. A higher target in the Local Plan across Medway would be overly prescriptive and could result in deliverability or viability issues, noting that BNG assessment work is complex and varied .

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

- 5.4 The approach put forward is pragmatic and aligns a number of key elements, including aspects that can deliver BNG, wider ecological benefit and other elements of schemes important for ecology (such as informal recreational areas) and other disciplines (drainage, landscape, design).

Flood Risk and Drainage

- 5.5 **Policy DM1: Flood and Water Management** seeks to reduce flood risk, promote water efficiency measures, and protect and enhance water quality, these principles are supported. The policy states that developers/applicants will be required to apply the Sequential Test and, where necessary, the Exception Test as part of a planning application. It is understood that this Policy text is intended to cover development that sits outside of the local plan (i.e. is not an allocated site), and it would be useful for this to be clarified in the supporting text.
- 5.6 Surface Water Management Plans for Hoo and Rainham and Lower and Middle Stoke are published with the Reg 18 B supporting documents. These consider the risk of flooding from all sources to provide evidence for a Sequential and Exception Test and guidance for the completion of site-specific Flood Risk Assessments. As part of the evidence base to inform the next Regulation 19 Local Plan, the SFRAs will need to be updated, to incorporate a Sequential Test for the proposed site allocations and to ensure the evidence is up to date. This will ensure the Local Plan aligns with the NPPF and reflects the PPG (Reference ID: 7-027-20220825) which confirms that a Sequential Test is not required to be submitted with a planning application, if the site is at low risk from all sources of flooding; and/or, *'The site is allocated in the development plan and was subject to the Sequential Test at plan-making stage for a use consistent with the development that is being proposed'*.
- 5.7 CCE support the focus in the Reg 18 B Plan on the integration of surface water management and green infrastructure, which is evidenced in Policy DM1 and the Green and Blue Infrastructure Framework. CCE embed this concept into its masterplans, including those at the Hoo Peninsula (see Appendix 3 and the Vision Document), it being aligned to CCE's commitment to incorporating environmental, social and governance across its portfolio. For example, the measures set out in the SWMP for Hoo & Rainham (2020) for restricting surface water runoff measures, are already incorporated within the Vision Document and Concept Plans.

6.0 Built Environment

- 6.1 CCE is broadly supportive of the design principles set out within **Policy T1 Promoting High Quality Design**. The NPPF's emphasis on achieving well designed places is clear. CCE has adopted a wider commitment to formally integrate key sustainability considerations, including good design and sustainable placemaking, into all projects and delivery models, maximising the benefits for new and surrounding communities.
- 6.2 However, in further developing the Regulation 19 Plan, Medway should consider how the principles at Policy T1 will sit alongside future Area and site-specific Design Codes mentioned in supporting text, without duplication.
- 6.3 **Policy DM5 'Housing Design'** introduces a further set of requirements for housing schemes. As drafted, DM5 is inflexible in relation to single aspect units - stating *'Limited single aspect homes will be considered favourably, i.e. no more than 5% north facing single aspect homes within any one development will be considered'*; and, *'No ground floor single aspect north facing homes will be considered at all.'*
- 6.4 This wording should be revised with additional text added to increase flexibility, we suggest: *'a single aspect dwelling should only be provided where it is considered to be an appropriate design solution'*. Whilst it is important to seek to maximise dual aspect dwellings in a development, it is often the case that to achieve design-led optimisation, a proportion of (still high quality) single aspect homes are needed.

7.0 Housing

Housing need and supply

- 7.1 The Reg 18 B document refers to the Government's standard methodology for housing need formula, which at the time of publication of the document identified a need for 1,658 homes a year. CCE support that Medway intends to meet this need in full. The approach is aligned to the NPPF 2023, and to the Government's current consultation into the proposed reforms to the NPPF (2024). The proposed reforms emphasise the importance of planning to meet housing needs in full. The consultation clearly states that LPAs will be expected to make all efforts to allocate land in line with their housing need as per the standard method.
- 7.2 The NPPF 2023 at Para 86(d) sets out that "*Planning policies should... be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances*". In practice this means ensuring a housing trajectory has sufficient land supply across the Plan period so that it can adjust and accommodate any unforeseen circumstances. Critically, this means that to achieve a housing requirement a Local Plan must release sufficient land, or allow sufficient headroom, so that there is an appropriate buffer within the overall planned supply. The Reg 18 B document does not include a housing trajectory, but an appropriate supply buffer must be considered by Medway in the publication of its Regulation 19 Plan later this year. Medway must ensure that it includes a range of sites, strategic (such as CCE's land at east and west of Ropers Lane), and smaller (such as those within CCE's wider rural landholding) to ensure a robust supply for the full Plan period.
- 7.3 This is particularly important in the context that Medway cannot demonstrate a 5YHLS – it is 3.3 years as of 31 March 2023. In addition, as demonstrated by the Government's Housing Delivery Test (HDT), Medway had significant under delivery of housing over the previous three years – the current (2022) HDT score is 79%. Medway must ensure it puts forward sufficient, flexible and robust housing supply within its Regulation 19 Plan to make good this backlog, and plan for its needs into the long term. Therefore, sustainable locations such as east of Ropers Lane should be included in the Regulation 19 to enable Medway to fully meet its housing need.

Affordable Housing

- 7.4 ***Question: 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?***
- 7.5 CCE support the importance given in the Reg 18 B Plan to affordable housing, it being a 'key priority'. CCE's strategic landholdings provide the opportunity to make a significant contribution to affordable housing in Medway. There is a need to provide the right homes in the right places to meet Medway's growing affordable housing needs. **Policy T3 Affordable Housing** proposes 30% affordable housing in 'high value areas' including the Hoo Peninsula and suburban greenfield sites. The policy states: '*A viability assessment in line with national policy and guidance should be submitted to the Council to be independently verified if the affordable housing proposed does not meet that which is*

required.' The policy should be amended to make it clear that, should the viability assessment demonstrate the requirement for affordable housing is not achievable, then a lower level could be acceptable.

- 7.6 On Tenure mix, Policy T3 refers to '49% affordable home ownership, including First Homes'. Medway will be aware that the Government's proposed changes to the NPPF (2024), would remove the requirement for 'First Homes'. Should this change be published within an updated NPPF towards the end of the year, the Regulation 19 Plan will need to be updated accordingly.
- 7.7 In addition, the Policy refers to the 'Local Plan Viability Assessment', which was undertaken in 2022. An updated Viability Assessment will need to be prepared and published with the Regulation 19 consultation later this year, and Policies reviewed in line with this document to check the 10% and 30% requirements remain achievable.

Self Build and Custom Housebuilding

- 7.8 **Policy T9 Self-build and Custom Housebuilding** requires that sites of 100+ dwellings will be expected to provide no less than 4% plots for self and custom build, to be secured by S106 agreement. The 4% should be justified by Medway via appropriate evidence at the Regulation 19 stage. Self-build plots can be an important part of housing supply, contributing to meet the needs of Medway's communities, reflecting the range of sizes, types and affordability the area needs. However, the policy states:
- 7.9 *"if any plot(s) remain unsold after being marketed for the minimum period, they can either remain for sale as a self/custom build plot or be offered to the Local Authority to acquire for the provision of affordable housing (separate from any relevant affordable housing requirement for the Development as applicable), before reverting back to the land owner to build out on the plot or sell without restriction. To prevent the delay of housing delivery, the Local Authority will be given a time period of three months to acquire the vacant plot(s). This provision will be secured as part of the original Section 106 agreement"* (our emphasis).
- 7.10 This 'cascade approach' will have implications for the viability of sites and will need to be tested fully by the Council in its updated Viability Assessment (as above). CCE is aware of a number of other adopted Local Plans where, if there is no interest after 12 months of marketing, the plot reverts straight back to the developer, without cascade or restriction. This should be included in the Medway Local Plan.

Small Sites

- 7.11 CCE support the inclusion of Policy T11 **Small Sites and SME Housebuilders** as it will allow the delivery of smaller and medium sized sites, in conjunction with larger residential allocations, such as at Hoo St Werburgh and All Hallows ensuring it is positively prepared in accordance with Paragraph 35a of the NPPF.
- 7.12 CCE's land at Sharnal Street provides an example of a site which could be delivered under Policy T11 (between 5 – 60 dwellings). The site is located in a sustainable location. Whilst CCE is supportive of Policy T11, it is considered that one of the criteria should be amended to ensure it is effective and consistent with national policy. As such, we request the following amendment:

- 7.13 *'Proposed developments must not result in an unacceptable level of harm, to residential amenity, designated heritage assets, or environmental resources and biodiversity, **unless adequately mitigated..**'*

Conversion and reuse of countryside buildings

- 7.14 The Reg 18 B Plan does not currently include a policy for conversion or reuse of redundant or disused buildings located within the Countryside. Paragraph 84c of the NPPF (2023) is supportive of the reuse of such buildings. It follows, to ensure the Medway Local Plan is consistent with national policy, a conversion policy should be included.
- 7.15 The absence of this policy would prevent the delivery of rural housing through sustainably converting existing buildings in the countryside. It is therefore a missed opportunity. Successful examples of such conversion schemes in the countryside have been of significant benefit to Medway, both in terms of contributing to the overall housing land supply and making effective use of disused buildings which would otherwise lie vacant, whilst improving the overall setting and character through sensitive design and providing an important contribution to the prosperity of the rural economy. Further, CCE has a number of sites which are deemed suitable for conversion into residential use, and has received positive pre-application responses from Medway Council supporting the proposed conversion developments.
- 7.16 Paragraph 6.1.1 of the Reg 18 B Plan states that *'some of [the] poor quality homes have been provided through conversions under Permitted Development Rights, where they do not have to meet the normal requirements of a planning application for housing'*. A rural conversion/reuse policy would provide the Council with an opportunity to improve the quality of schemes which cannot be delivered under the Permitted Development Rights.
- 7.17 Therefore, we request that a policy similar to adopted Medway Local Plan Policy BNE27 be included, with the following suggested wording:
- Development involving the reuse of existing redundant or disused buildings in the countryside will be supported provided that:*
- the building is of a permanent, substantial construction and will not need major or complete reconstruction; and*
- the form, bulk and design of the building will be in keeping with the surrounding area; and*
- the building's character, any special features of architectural and historic value or its setting are not damaged; and*
- the nature, scale and intensity of the proposed use is not detrimental to residential amenity, or the character of the area.*

8.0 Economic Development

- 8.1 The NPPF 2023 (para 85) states that planning policies should help create the conditions in which businesses can invest, expand, and adapt. Plans should also set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth (paragraph 86(a)).
- 8.2 It is important that the Local Plan plans for a sufficient quantum and range of sites to meet the employment needs identified over the plan period. Supporting text refers to Medway's employment land needs being calculated and published within forthcoming evidence, to provide additional detail to the strategy.
- 8.3 CCE support the recognition in the Reg 18 B Plan's supporting text to **S10 Economic Strategy** that *'There is significant potential for the regeneration, and redevelopment, of employment sites on the Hoo Peninsula, in particular at the Isle of Grain, and the site of the former Kingsnorth Power Station'*.
- 8.4 As set out above (Section 4), CCE own land adjacent to the Kingsnorth employment area (HHH35). CCE support that part of the land being promoted has been identified by Medway on the Policies Map and '**Policy S12 'New Employment Sites'**', as a potential development area for non-residential use. CCE **object** to the omission of the full extent of CCE's land at Kingsnorth (Appendix 3) – this has not been justified within the supporting evidence base documents. Kingsnorth on the Hoo Peninsula is a unique opportunity for employment land provision, adjacent to the delivery of a new sustainable community, with a key role to play in Medway's economic development strategy. This should be carefully reviewed by Medway when updating the Plan for Publication at Regulation 19, alongside the employment needs evidence base.

9.0 Rural and Town Centres

9.1 **Policy S22: Hoo Peninsula** identifies the potential for significant development on the Hoo Peninsula as part of the new Local Plan. CCE support this Policy in the context of its strategic land holdings east and west of Ropers Lane and at Kingsnorth, forming part of the proposed allocation for the new Hoo Rural Town.

9.2 The supporting text notes that the existing centre use provision at Hoo is 'limited' and 'unsustainable', with the village centre physically constrained and rural residents often have to travel to Strood or Bluewater to undertake grocery shopping and comparison shopping. Further, Policy S22 states: *"New growth for the Hoo Peninsula will require support infrastructure and centres to provide for the needs of new residents. Current deficiencies in provision provides a unique opportunity to ensure appropriate provision for residents but also support efficiencies and sustainability."* CCE fully support this approach.

9.3 Growth at the Hoo Peninsula represents an opportunity for strategic, planned, sustainable growth. It is important that the allocation includes sufficient land and a critical mass of homes to support infrastructure, including retail to maximise the internalisation of trips and encourage sustainable modes of travel such as walking, cycling and public transport. The extent of required infrastructure should be informed by up-to-date evidence base, prepared by Medway in support of the Local Plan.

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

9.4 The supporting text of S22 Hoo Peninsula confirms the Council is collating evidence as part of the preparation of the Local Plan, which includes identifying the infrastructure and service needs linked to growth in this location. This evidence base will be a key document; it must undertake a capacity and needs based assessment to inform the emerging proposals for infrastructure and retail at the Hoo Rural Town, including whether the provision of a supermarket at Hoo is likely to be needed. CCE would welcome engagement with the Council on this evidence base to understand further the requirements for infrastructure to support the new Community. In the same way, CCE would welcome discussions with Medway on need, timing and location of other infrastructure including schools (see CCE's response to question 42).

9.5 Allocation of CCE's land at both east and west of Ropers Lane, would not only provide the opportunity for the delivery of a mix of much needed, high-quality homes (including affordable homes), but the opportunity to provide a sustainable mixed-use development, including education, employment and the opportunity for retail provision. Current illustrative concept proposals for development of CCE's land east and west of Ropers Lane are provided at Appendix 3 and in the Vision Document. However, this is not fixed and, should it be decided that land to the east of Ropers Lane would be usefully allocated alongside residential use to provide retail provision, or other infrastructure to encourage sustainable travel patterns for existing and new residents at the Peninsula, then this could be explored in consultation with Medway, CCE, and the wider Hoo Consortium.

- 9.6 In preparing its evidence base and developing the Regulation 19 Plan, Medway must consider the changing nature of the retail market. A data-led approach should be adopted to assess the amount of retail space which would be economically viable given the calculated anticipated retail spend of the new population

10.0 **Health, Communities and Infrastructure**

Public Open Space

- 10.1 CCE support and agree with the importance of promoting health and wellbeing and embedding such principles within the master planning and design of new developments from the outset. Provision of public open space is key to achieving successful, healthy developments for the future benefit and enjoyment of residents.
- 10.2 Corstorphine and Wright, CCE's appointed master planners note that the POS provision in the Reg18 B Plan proposes a substantial increase from the 2023 Local Plan which required 2.4Ha/1,000 residents, to 3.09Ha/1,000. Whilst achieving sufficient quantum of open space is important, equally important is delivery of high quality, well landscaped and integrated public open space. Medway will need to set out the justification for this increase in accompanying evidence base published alongside the Regulation 19 Plan.
- 10.3 Medway must ensure it has assessed the impact these open space requirements would have on the capacity of its draft preferred development sites (as shown on the Policies Map). There will be an impact on developable area, and ultimately the delivery of homes to meet the Authorities assessed housing needs. For example, the implication of DM21 would increase the requirement for green space to be allocated across CCE's Concept Masterplan for its land at Hoo St Werburgh from 18.4 Ha to 23.7Ha on Phase 1 and from 25.5Ha to 32.8Ha on the Phase 2 proposals (see Vision Document and Appendix 3), thus decreasing the land available for delivery of new homes. Further, DM21 includes additional area requirements per 1,000 population for parks and gardens, semi-natural green space, amenity greenspace, play, allotments, and indicates there will be a requirement for outdoor sports.
- 10.4 If Medway is seeking all of these requirements to be provided on sites, this would have a significant impact on the delivery of homes from its identified preferred sites. This may mean that the Council is required to identify additional sites as preferred allocations to meet its housing needs in full.

Infrastructure

- 10.5 The Draft Viability Assessment published for Consultation comprises that previously issued in an earlier Regulation 18 consultation undertaken in 2022, with the report drafted in December 2021. The report is therefore out of date as it does not reflect the allocations as currently proposed or current development costs and values which have changed significantly since this report was drafted. An updated Viability Assessment will need to be published alongside the Regulation 19 Plan, later this year/ early 2025.

Question 42: (a) Do you agree identifying the required infrastructure to support the scale and locations of growth within Medway is the correct approach? (b) Would a 'mini IDP approach' focusing on broad locations and strategic sites be preferred? Or do you have an alternative suggested approach?

- 10.6 CCE consider it prudent to identify the infrastructure required to support development in Medway. Large scale strategic infrastructure, such as schools and road junctions, should be

identified and funded by those allocations which benefit from their development. A mini IDP approach could be used to identify infrastructure, which is solely required for, and therefore funded by a single allocation.

Question 43: Align infrastructure provision in line with this growth how can we balance growth and new infrastructure requirements with funding gap?

- 10.7 Sufficient development will need to be delivered to fund the construction of infrastructure. Careful consideration will need to be given as to when elements of infrastructure is required and then ranked in terms of priority, so it can be delivered in a stages across the development period of an allocation ensuring its viability.

11.0 Conclusion

- 11.1 In summary, CCE encourage the Council to ensure that emerging policy creates a positive vision for Medway, is consistent with the NPPF (including, taking account of the Government's proposed revisions to the NPPF, 2024) and allocates sustainable sites for housing, and employment in line with the established need, in a manner that is sustainable and deliverable.
- 11.2 CCE is overall supportive of the Reg 18 B Plan and supporting evidence documents, which include meeting housing needs in full and identifying potential housing sites in urban locations and on previously developed land, as well as in greenfield locations. The identification and release of less constrained greenfield sites will be needed to meet Medway's significant housing need and to provide the range of housing types needed, including family homes and affordable housing.
- 11.3 For this reason, CCE consider that the full extent of the land it is promoting at Hoo St Werburgh (east and west of Ropers Lane and at Kingsnorth), Allhallows, land around Stoke and Sharnal Street as set out in these representations are suitable for providing new homes to meet housing needs, both in the short and longer term. CCE also support the expansion of employment uses at Kingsnorth which could deliver much needed employment growth on the Peninsula.
- 11.4 However, importantly, CCE consider the Reg 18 B document makes a considerable omission in not allocating land east of Ropers Lane, or the third parcel of land at Kingsnorth. In particular, CCE object to the extent of safeguarded land identified for a potential new Station on this land, without any surrounding land allocated for development. These representations and the accompanying Vision Document demonstrate how CCE's land to the east of Ropers Lane could come forward, with a suggested phased approach, if needed, whilst still safeguarding land (albeit a smaller, more realistic and flexible parcel) for a potential future rail connection. Allocating the full extent of this land at Hoo would demonstrate Medway is taking the opportunity to prioritise the allocation of the most sustainable sites, to provide much needed homes, employment and infrastructure to support existing and future communities into the long term.
- 11.5 We consider that the suggestions set out within these representations will assist in ensuring sustainable and deliverable development within Medway to help meet the Council's vision, strategic objectives and spatial development strategy.
- 11.6 Please contact Lichfields if you have any questions regarding these representations. We would welcome the opportunity to meet with Medway Officers to discuss CCE's landholdings and the emerging Plan further.

Appendix 1 Representations to Reg 18 B Plan Chapter 9 – Transport – Pell Frischmann

Project	Medway Representations
Document Title or Subject	Medway Local Plan (Regulation 18) Representations
Document Reference	105391-PEF-XX-XX-RP-TR-000100
Revision Reference	P01
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1 Introduction

1.1 Background

- 1.1.1 Pell Frischmann (PF) has been appointed by the Church Commissioners for England (CCE) to provide transport planning and highways engineering advice, and to produce this Technical Note (TN) summarising CCE’s transport representations with regard to the emerging Medway Local Plan (LP) which is currently at Regulation 18 consultation stage.
- 1.1.2 CCE is responsible for substantial land holdings across the Medway, including the Hoo Peninsula.

1.2 Scope of this Technical Note

- 1.2.1 MC have developed a new LP to provide the framework to guide the development and use of land in Medway up until 2041; it will replace the previous 2003 Medway LP. MC released the LP for Regulation 18 consultation in July 2024. It is envisaged that MC will release the draft LP by early 2025.
- 1.2.2 This TN summarises the representations of CCE with regard to the transport aspects of the emerging LP, including:
- Their view on the extent to which the LP is suitable to achieve its transport aims;
 - How the LP relates to the proposals on the Hoo Peninsula; and
 - A high-level review of the LP proposals.
- 1.2.3 Overall, CCE considers the emerging LP as an appropriate starting point for a cohesive transport vision for the Hoo Peninsula. Policies and strategies emerging within the LP have been reviewed, in particular those with a direct transport focus, and are broadly welcomed for inclusion within the LP. It is considered that there are some areas where these can be further strengthened to ensure a more successful LP and to the benefit of the entire Medway region. CCE supports the overarching principles of the emerging LP, seeking to improve and stretch the sustainable ambitions of the proposals where possible.

2 Representations

2.1 Purpose of the LP and Strategic Objectives

The emerging LP states that: “[The LP will] manage the area’s growth up to 2041... [and] provide a framework for where and how new development can take place. The plan will help to deliver on the Council’s ambitions for the local and global environment, supporting people and boosting jobs and investment in Medway” [Section 1.1.1, p16].

- 2.1.1 CCE is highly supportive of MC's ambition to create a cohesive strategic development framework in Medway in order to unlock long term investment and growth opportunities across the region, specifically that on the Hoo Peninsula. CCE will seek to continue to work alongside MC (and other stakeholders) in achieving this vision.
- 2.1.2 The LP outlines four strategic objectives to ensure positive development and infrastructure for the area, namely:
- *"Prepared for a sustainable and green future" [Section 2.2.1 p22]*
 - *"Supporting people to lead healthy lives and strengthening our communities" [Section 2.2.1 p23]*
 - *"Securing jobs and developing skills for a competitive economy" [Section 2.2.1 p23]*
 - *"Boost pride in Medway through quality and resilient development". [Section 2.2.1 p24]*
- 2.1.3 CCE is supportive of the strategic objectives outlined in the emerging LP and believes that these are well-rounded, stretching but achievable objectives for Medway. Transport matters are instrumental to all these objectives and further detail was provided in the emerging LP for each objective, of which the following are key:
- *"[Preparing for a sustainable future by] supporting major shifts in modes of transport used to reduce carbon impacts." [Section 2.2.1 p22]*
 - *"To strengthen and develop transport networks providing safe and effective choices for sustainable travel, including improved opportunities for walking and cycling and enhanced public transport services, and management of the highways network, with associated improvements in air quality" [Section 2.2.1 p22]*
 - *"To reduce inequalities in health and deliver better outcomes for residents, by promoting opportunities for increasing physical activity and mental wellbeing... public realm design for walking, cycling, parks and other recreation facilities, and improving access to healthy food choices" [Section 2.2.1 p23]*
 - *"[To reduce inequalities in health through a reduction in] social isolation by supporting retention and development of businesses and local services close to where people live, and connected and inclusive environments that are accessible by all groups in society." [Section 2.2.1 p23]*
securing a range of accessible services and facilities for local communities close to where they live
 - *"[To boost pride in Medway through quality and resilient development and to] improve the accessibility and design of the public realm that will help people to live healthier lives and open up travel choices, reducing car dependency, and improving connectivity for nature." [Section 2.2.1 p24]*
- 2.1.4 CCE welcomes the broad range of transport strategies which underpin the strategic objectives and contribute towards a variety of socioeconomic improvements in Medway. The acknowledgment of a required reduction in car dependency is welcome, as is the need for corresponding improvements in active travel opportunities and public transport provision.
- 2.1.5 As a major landowner and development partner on the Hoo Peninsula, CCE is committed to sustainable development which provides for and enhances access to public transport and active travel modes. The integration of sustainable transport into new development through a vision-led approach will be key to ensuring that new developments can come forward in a complementary manner to existing development, whilst being sensitive to the unique constraints of the Hoo Peninsula.
- 2.1.6 CCE is also supportive of the development of diverse businesses and services alongside planned residential development. CCE notes that this also supports sustainable objectives by playing a part in supporting Medway's shift away from car dependency (and the associated impacts) towards more locally-focussed active travel trips. CCE considers this strategy central to achieving holistic sustainable development on the Hoo Peninsula.
- 2.1.7 CCE supports the prioritisation of sites that reflect co-ordinated and spatially-linked commercial and residential development. A particular opportunity for this form of sustainable development is the collection of residential sites on the eastern boundary of Hoo St Werburgh (adjacent to the planned Medway One), in particular the potential development sites either side of Ropers Lane. These sites can maximise opportunities for access to public transport and active travel infrastructure by concentrating density around transport nodes, such as along Ropers Lane. Given this, CCE considers it would be appropriate to also include the land east of Ropers Lane in the proposed site allocations.

2.2 Section 9 – Transport

- 2.2.1 Section 9 of the LP specifically focuses on the transport elements of the LP strategic framework for development in Medway. The following section of this TN highlights the key LP transport strategies, with accompanying comments.

"The Hoo Peninsula has reduced car dependency and achieved a higher level of self-containment to facilitate local living in an age of increased remote working, while local employment opportunities are available at Kingsnorth and the Isle of Grain. Travel choice to/from the rural area has been improved through planning and investment in public transport." [Section 9.1.5, p153]

- 2.2.2 Whilst CCE is supportive of the overarching theme and sentiment of this approach, it is suggested that the term "self-containment" could be interpreted in a negative way in the current climate. An alternative terminology – such as 'self-sufficiency' – could serve to highlight the positive attributes of localised place-making in a manner more conducive to the aims of the LP.

"The place-based vision for access and movement marks a shift from the traditional 'predict and provide' approach to the latest best practice 'vision and validate' approach." [Section 9.1.8, p153]

- 2.2.3 CCE strongly welcomes the approach of place-based vision for access and movement as an essential component of sustainable transport planning and key to the LP achieving its strategic transport objectives.

"As a minimum, development proposals for site allocations will demonstrate how vehicle trip generation would be 10 per cent lower than the vehicle trip credit set in the STA." [Section 9.2.11, p154]

- 2.2.4 CCE agrees with the principle of a vehicle trip credit and believes that a 10 per cent reduction (if not better) in vehicle trip generation is an achievable target for developments on the Hoo Peninsula, if the appropriate level of mitigations are implemented at both local and strategic levels. A sustainable transport strategy for the Hoo Peninsula will help to both achieve and potentially further increase the modal shift away from private car use.

"Development proposals in urban centres, including site allocations, are exempt [from mitigation contributions] due to their accessible location" [Section 9.2.11, p154]

- 2.2.5 CCE understands that different forms of development are expected to contribute towards transport mitigations commensurate with their impacts, but would query why accessible locations are proposed to be exempt from contributions.

- 2.2.6 Accessible areas will have high levels of frequent public transport and impacts in these areas could, for example, impose new associated service running costs or additional active travel infrastructure needs. Employees, residents and other users of current accessibly-located developments will still require connectivity to less accessible areas, particularly if future commercial development is encouraged in areas that are currently less accessible, such as the Hoo Peninsula.

- 2.2.7 The LP has the greatest chance of success if all stakeholders have an involvement in the expansion of the public transport and active travel networks in Medway, regardless of their current location. Exempting more accessible sites from contributing towards these transport improvements will therefore have viability implications for the remaining site allocations.

"The river represents an important transport corridor for commercial and leisure traffic. The introduction of a new river crossing and a riverside path could facilitate sustainable transport and address the restrictions that apply to pedestrians and cyclists who are unable to use the Medway Tunnel, or where the local road network is not conducive to walking and cycling." [Section 9.3.2, p156]

- 2.2.8 CCE agrees with the above statement and considers that this presents an opportunity to explore the feasibility of further strategies utilising the River Medway. The LP does not currently appear to consider improvements to the River Medway transport infrastructure on the Hoo Peninsula.

"The Policies Map shows safeguarded land for new rail infrastructure [on the Hoo Peninsula], including a station, route alignment and buffer stop zone. Development proposals which compromise this policy will be resisted." [Section 9.4.4, p158]

- 2.2.9 CCE notes that rail infrastructure is being safeguarded for possible future utilisation at Grain under Policy DM17, however would suggest emphasis on a package of more readily-deliverable alternative sustainable transport measures in the medium term on the Hoo Peninsula.

Whilst the principle of the safeguarding is understood, CCE object to the extent of safeguarding shown in the Policies map (relating to policy DM17: Grain Branch), without any surrounding land allocated for development. The LP is silent on justification for the extent of land take required for this safeguarding - this must be provided, given the opportunity for this site to deliver significant quantum of new homes and employment, as part of the wider sustainable development at the Hoo Peninsula. Appendix 3 of the Representations and the enclosed Vision Document, prepared by C&W Architects provide CCE's current concept proposals for land to the east of Ropers Lane. This demonstrates how the site could come forward whilst still safeguarding sufficient land for a future station at Grain. Allocation of Land east of Ropers Lane for residential-led mixed use development would provide a logical link between the land west of Ropers Lane (which is identified as a preferred housing allocation by Medway on the Policies Map), the potential future Station at Grain, and CCE's employment land parcels at Kingsnorth. As shown at Appendix 3, all of these land uses would be linked via sustainable transport solutions – walking, cycling and public transport, including the provision of Mobility Hubs.

The Policies Map/DM17 should therefore be identified more generally and be more flexible, with further details to follow, if and when any proposals for a station come forward.

"Development proposals on the Hoo Peninsula will adhere to an Area-wide Travel Plan. This reflects the specific circumstances of this rural area. This will identify mode share targets and specific measures aligned with the anticipated phasing of new development. The Area-wide Travel Plan will set out positive and practical measures; it will need to be flexible, but sufficiently detailed and meaningful. Having established a baseline, monitoring arrangements will assess the performance of the road network and, should targets not be met and/or the performance of the road network found to be unacceptable, set out any additional measures required." [Section 9.11.8, p167]

- 2.2.10 CCE agrees with and supports this trip management methodology, in particular the use of an established mode share baseline and mode share targets. This should be built upon, and further detail provided when appropriate. CCE considers that this mode share baseline methodology should target a range of strategic transport objectives previously outlined in the LP and that it will be key to unlocking sustainable development on the Hoo Peninsula.

"The Area-wide Travel Plan to cover the Hoo Peninsula will help to:

- *reassure local communities in providing for better transport;*
- *deliver the proposed place-based vision for access and movement;*
- *satisfy the requirements of the relevant transport authorities;*
- *provide for a smooth planning process; and*
- *address air quality and noise impacts." [Section 9.11.13, p168]*

- 2.2.11 CCE accept and support the proposed Area-wide Travel Plan for the Hoo Peninsula and note that this will be key for sustainable development in the future, whilst supporting existing development in the area.

- 2.2.12 CCE encourage Medway, in consultation with National Highways, Kent County Council, neighbouring Local Authorities and key stakeholders, to ensure that a full and robust transport evidence base is progressed and published alongside the Regulation 19 consultation. This will be important to ensure a sustainable, long term transport strategy for the plan period to facilitate the levels of growth required to meet housing and economic needs. The delivery of a strategic scale development at the Hoo Peninsula would form an important element of the Local Plan and a robust highway strategy should be in place. CCE welcome engagement with Medway on this key evidence base, in advance of publication of the Regulation 19 Plan.

3 Summary and Conclusion

- 3.1.1 This Technical Note (TN) summarises CCE's transport representations with regard to the emerging Medway Local Plan (LP) currently at Regulation 18 consultation.
- 3.1.2 The policies and strategies in the emerging LP with a direct transport focus have been reviewed, and are generally welcomed for inclusion within the LP. The transition away from a 'predict and provide' transport planning focus to a 'vision and validate' method is a strongly supported change in approach, as are the inclusion of the Area-Wide Travel Plan and the establishment of a multi-modal baseline mode share. CCE is supportive of co-ordinated commercial and residential strategic development, with a focus on development place-making, noting that they are already engaged in this activity with other stakeholders as a part of the wider Hoo Consortium.
- 3.1.3 However, while the principle of the safeguarding of the Grain Branch (DM17) is understood, CCE object to the extent of land proposed to be safeguarded and, thereby, not permitted for other development. The safeguarding should be identified more generally and be more flexible, with further details to follow, if and when any proposals for a station come forward. Further, CCE object to safeguarding the land for a station, without any surrounding land allocated for development. The wider Representations, prepared by Lichfields and the accompanying Vision Document, prepared by C&W demonstrate how CCE's land to the east of Ropers Lane could come forward, with a suggested phased approach, if needed, whilst still safeguarding land (albeit a smaller, more realistic and flexible parcel) for a potential future rail connection at Grain. CCE consider the focus should be on the package of more readily-deliverable alternative sustainable transport measures in the medium term on the Hoo Peninsula.
- 3.1.4 CCE considers that the new LP presents an opportunity for prioritising sustainably-planned residential-led developments with strong links to new employment centres. The Hoo Peninsula provides a number of such opportunities, such as the proposed site allocation for a potential development at Ropers Lane. This area is closely located to planned and existing employment centres and development, such as both Hoo St Werburgh and MedwayOne.
- 3.1.5 Overall, CCE considers the emerging Medway Local Plan as an appropriate starting point for a cohesive vision for the Hoo Peninsula. CCE welcomes the ambitious policies that clearly target sustainable development on both the Hoo Peninsula and across the wider Medway region, and which are orientated around the key transport objectives of the LP, noting (where relevant) where it is considered that some aspects of the LP can be strengthened.

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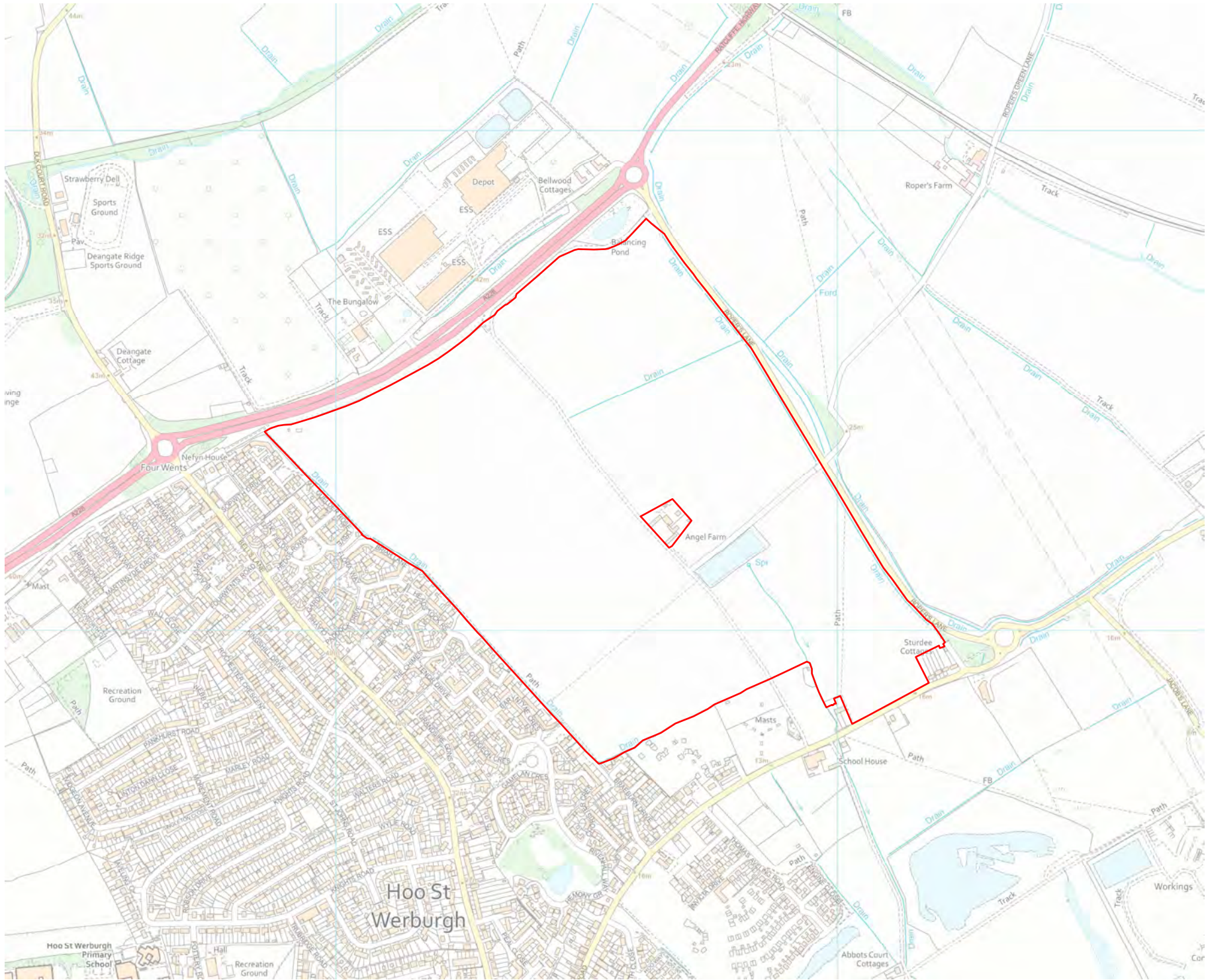
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Rev	Suit	Description	Date	Originator	Checker	Approver
P01		For review	08/08/2024	GR	CJO / DW	PDS

Ref. reference. Rev revision. Suit suitability.

Appendix 2 Site Location Plans

2a – West of Ropers Lane, Hoo St Werburgh (ref. HHH22)



Key

Site Boundary (area: 74.0 ha)

0 100 200 m

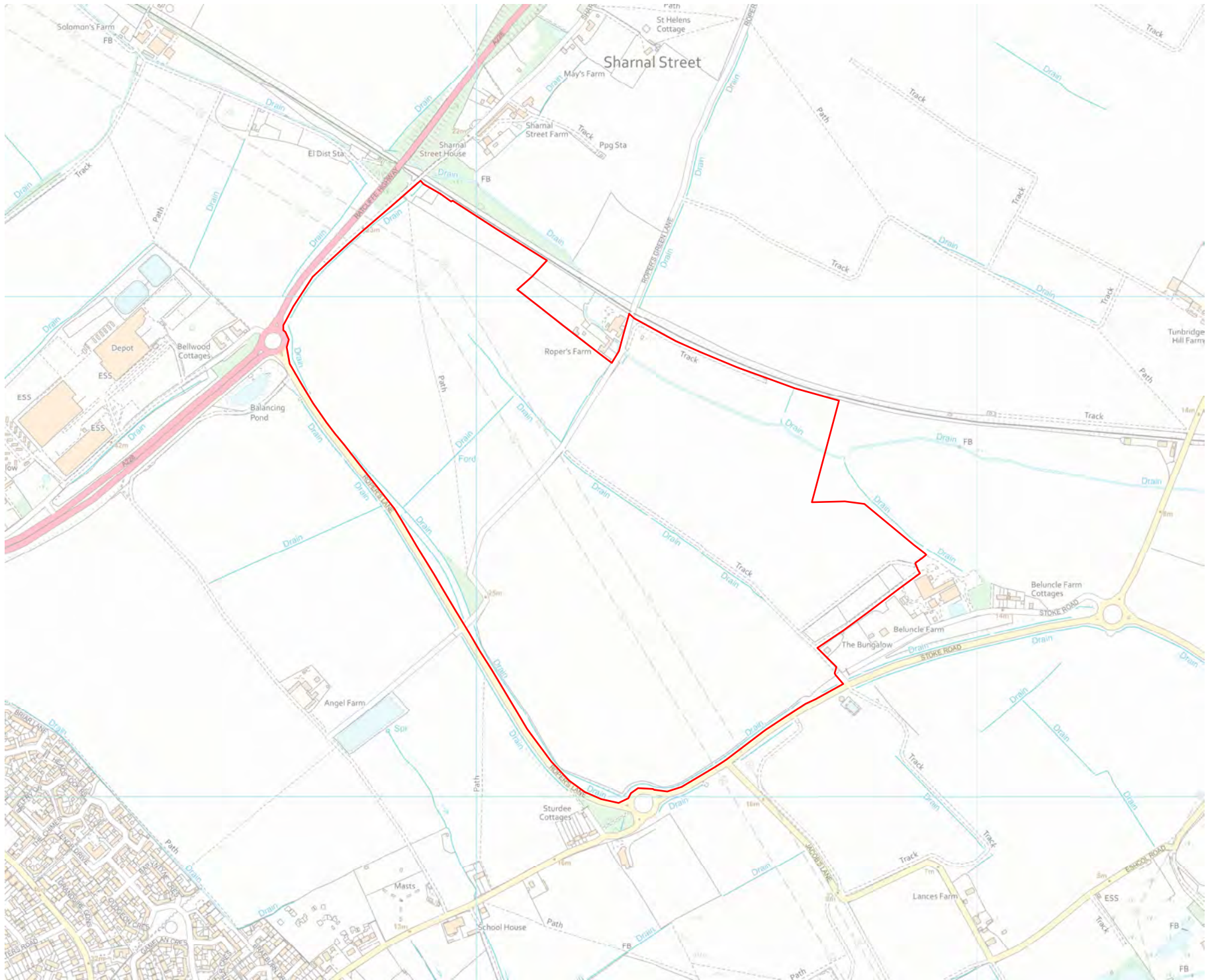
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Project	Medway Call for Sites 2023
Title	Site Location Plan - Hoo: West of Ropers Lane
Client	The Church Commissioners for England
Date	24.02.2023
Scale	1 : 10,000 @ A4
Drawn by	MAR
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2b – East of Ropers Lane, Hoo St Werburgh (ref. HHH31)



Key

Site Boundary (area: 82.3 ha)

0 100 200 m

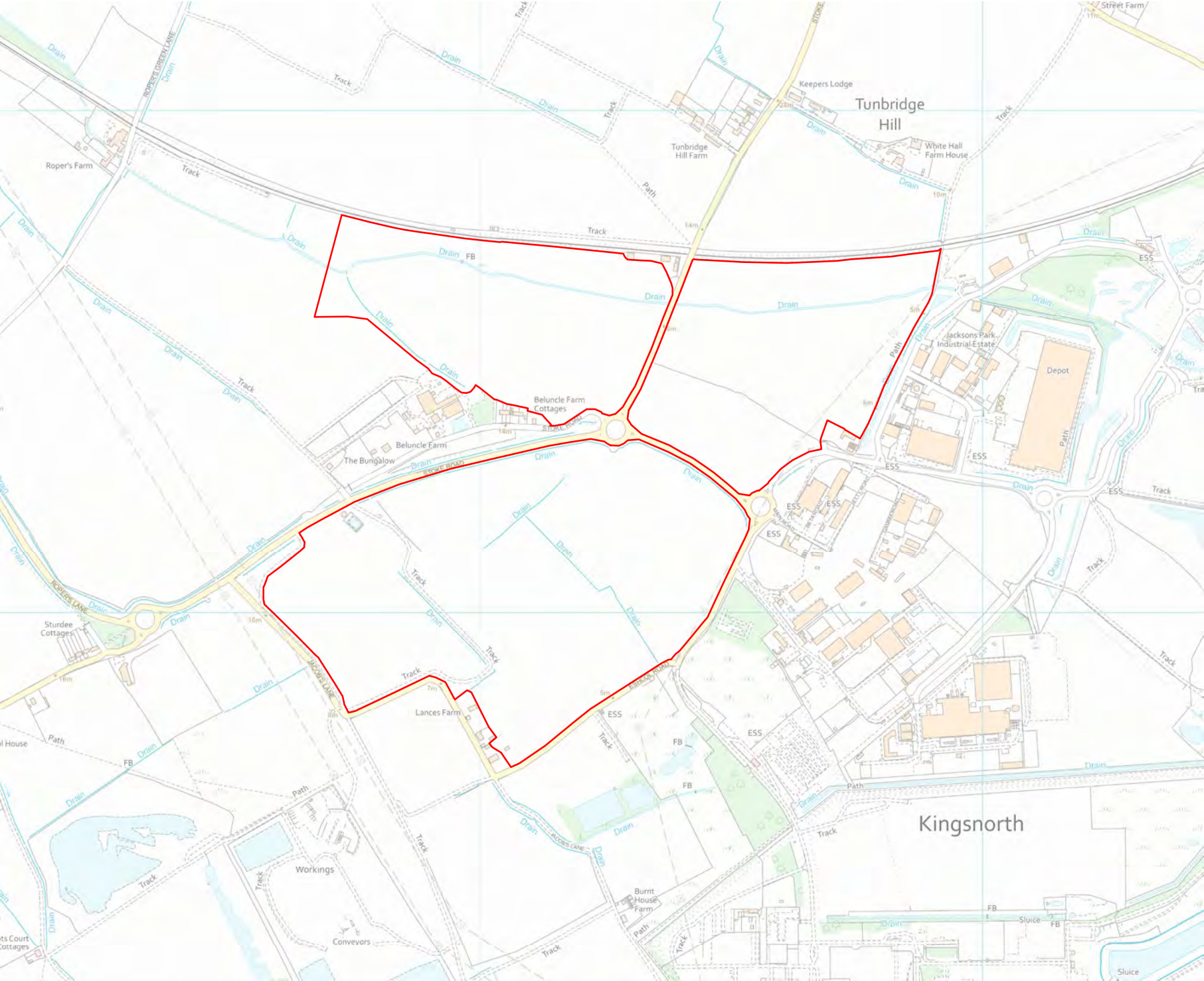
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Client	The Church Commissioners for England
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2c – Kingsnorth (HHH35)



Key

Site Boundary (area: 76.6 ha)

0 100 200 m

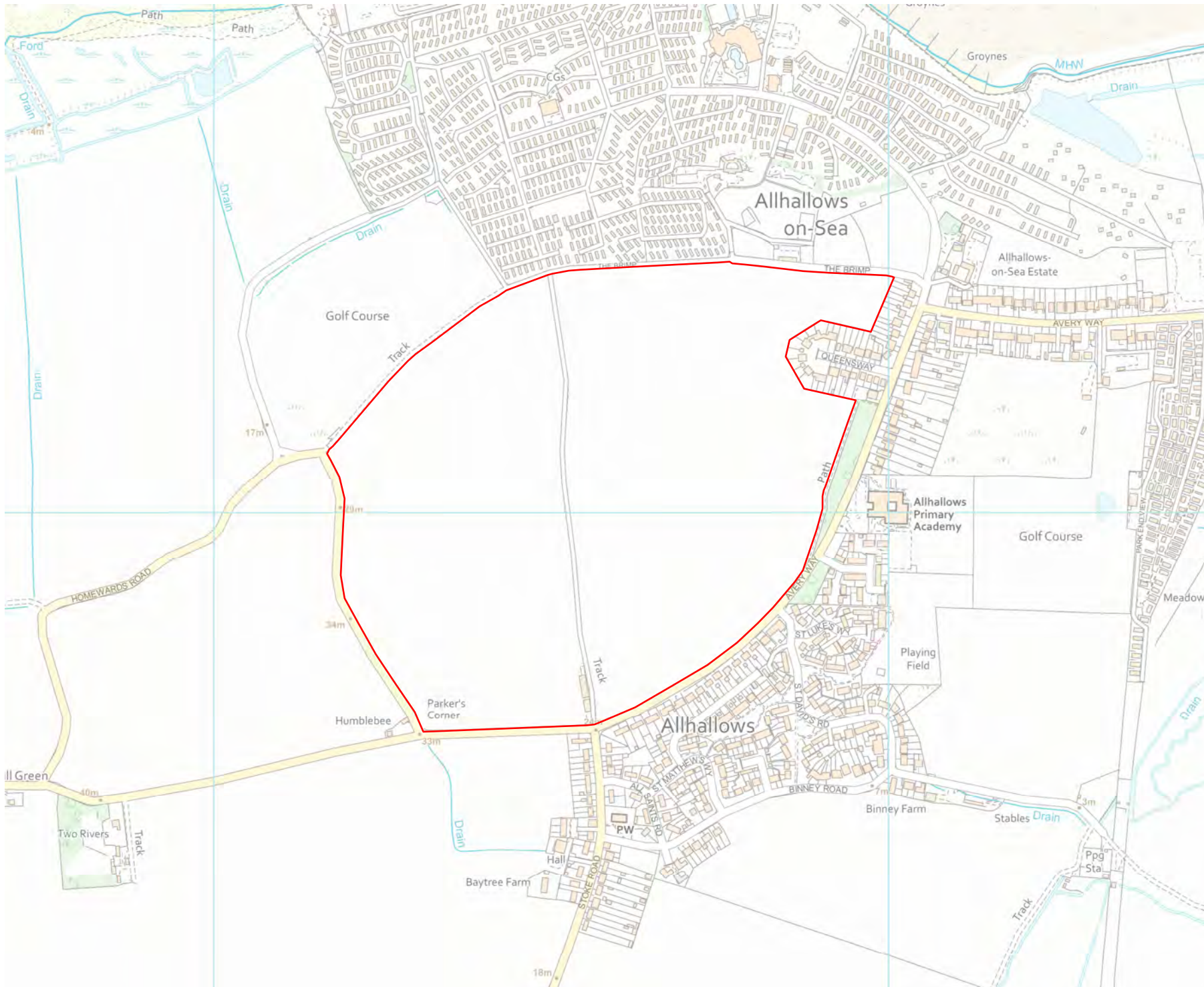
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Client	The Church Commissioners for England
Date	24.02.2023
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2d - All Hallows (ref. AS21) – Site Location Plan



Key



Site Boundary (area: 41.3 ha)

0 100 200 m

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LICHFIELDS

Project Medway Call for Sites 2023

Title Site Location Plan - All Hallows

Client The Church Commissioners for England and Bourne Leisure Limited

Date 24.02.2023

Scale 1 : 7,500 @ A4

Drawn by MAR

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

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



2d - All Hallows (ref. AS21) – Indicative, high level Concept Plan



Key

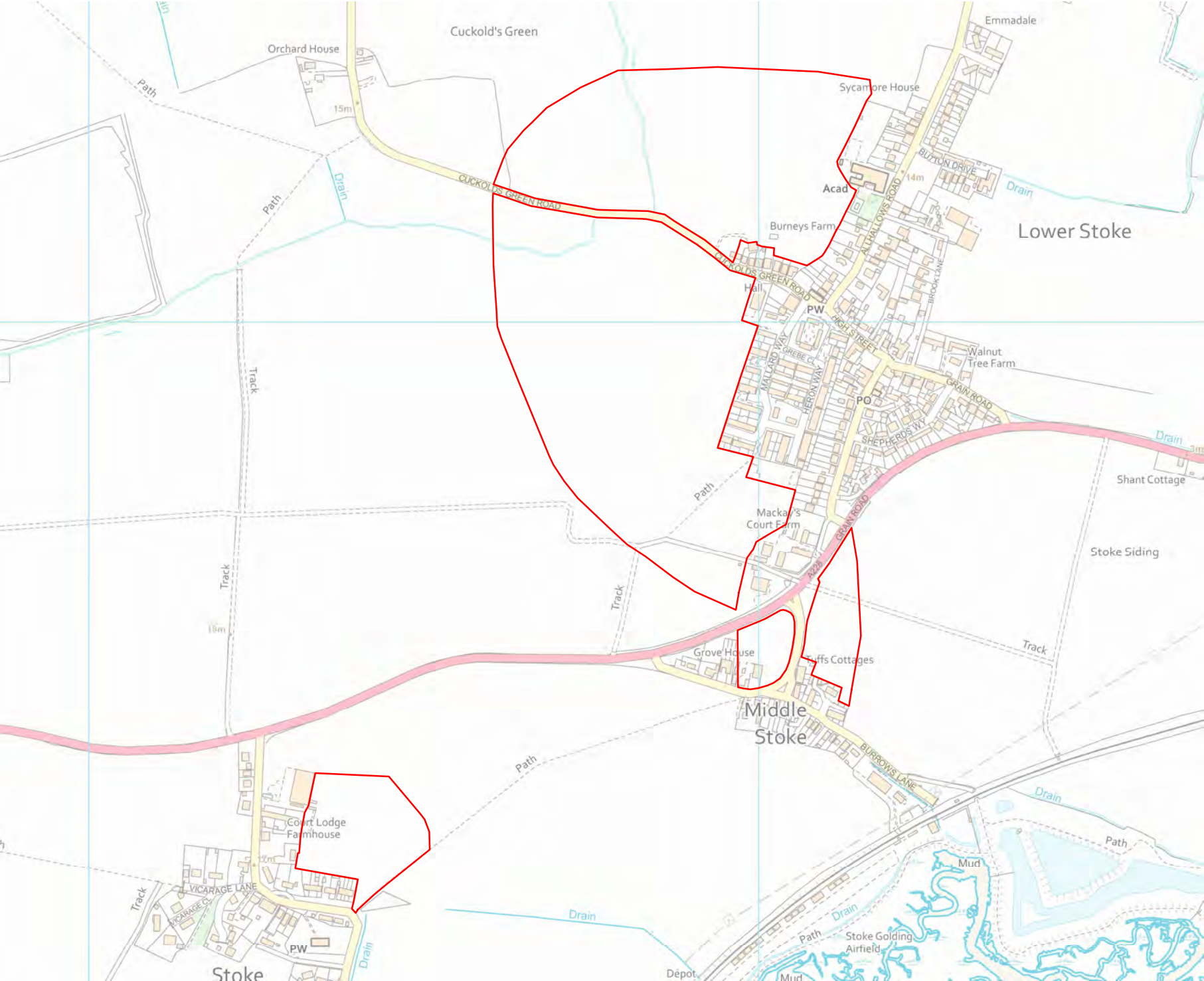
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- Haven Development
- Residential Development
- Public Open Space/
Landscaping

DRAFT

LICHFIELDS

Project	Allhallows
Title	Site Concept Plan
Client	The Church Commissioners for England
Date	06.09.24
Scale	NTS
Drawn by	SG
Drg. No.	IL04051-03-001 RevD

2e – Lower Stoke (ref. AS13)



Key

Site Boundary (area: 32.8 ha)

0 100 200 m

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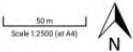
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Title	Site Location Plan - Lower Stoke
Client	The Church Commissioners for England
Date	24.02.2023
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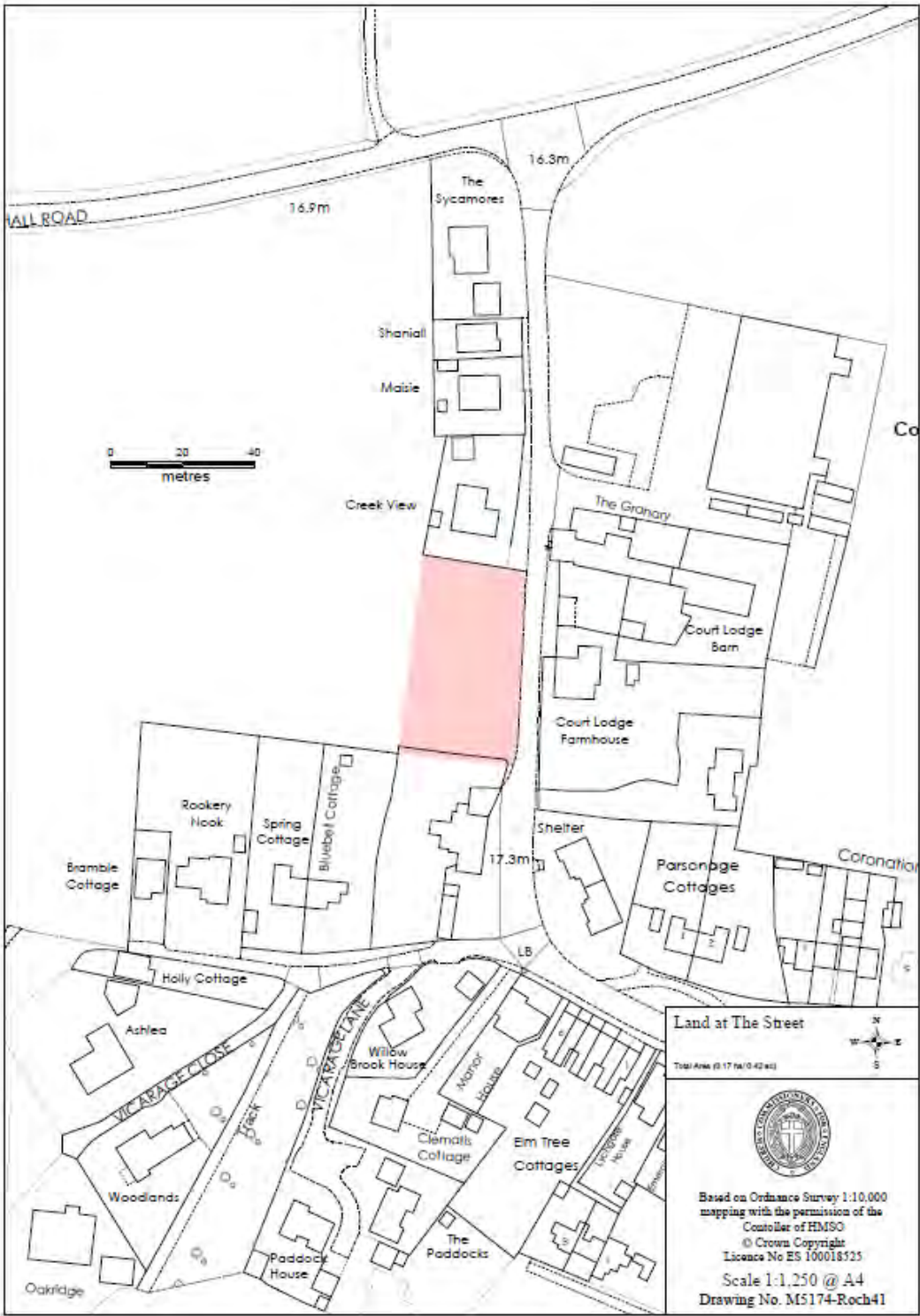
2f - Mackays Court Farm (Middle Stoke – refs. AS14 and AS16)



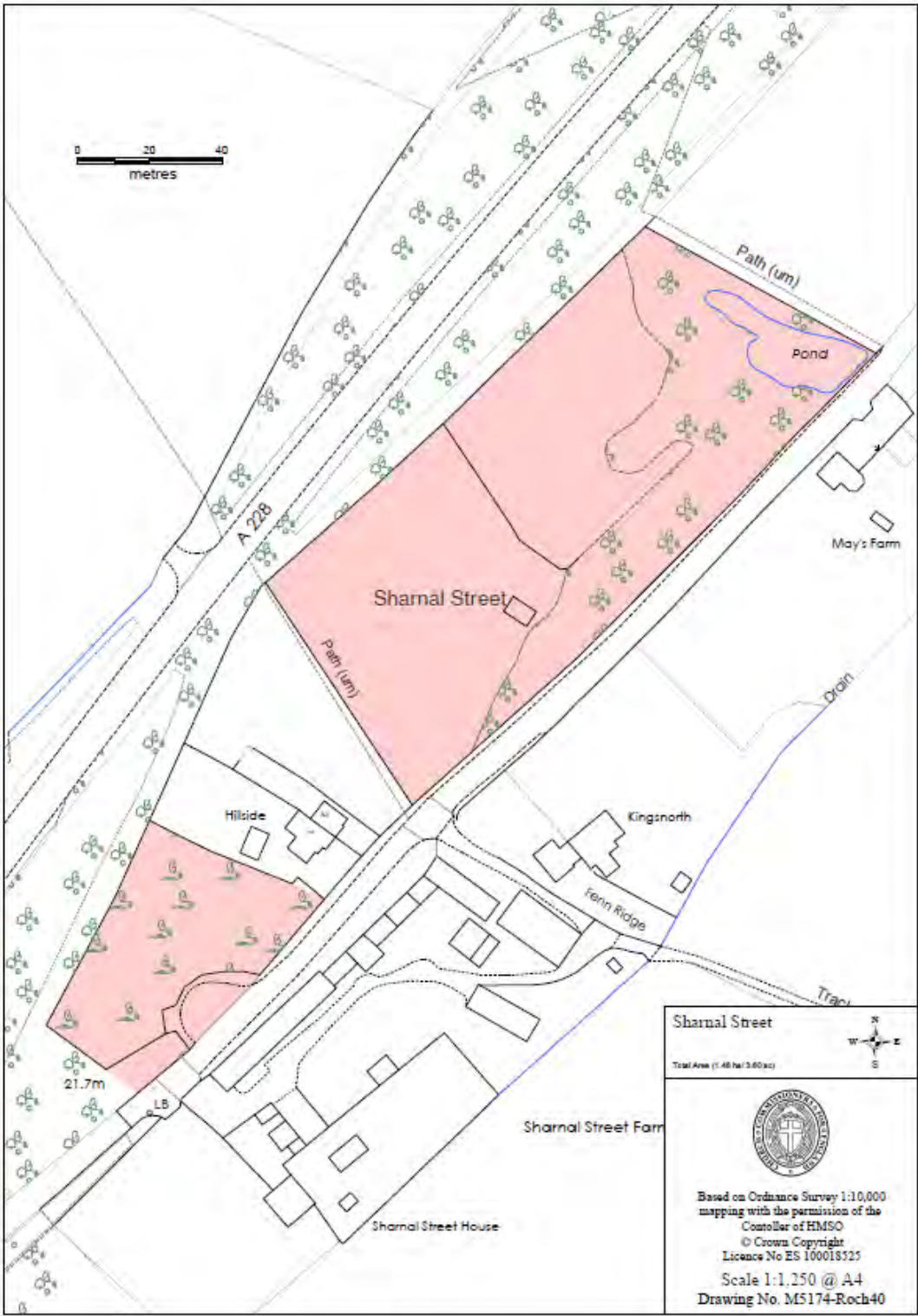
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2g - Land west of the Street (Upper Stoke – ref. AS11)



2h - Sharnal Street (ref. HHH28)



2i - Burney’s and Nord Court Farm (ref. AS29)

Site Location Plan Land to the West of
Stoke Road



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Appendix 3 Hoo St Werburgh, Land East and West of Ropers Lane and Kingsnorth Concept Plans, C&W

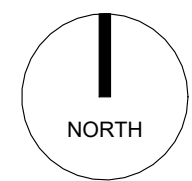
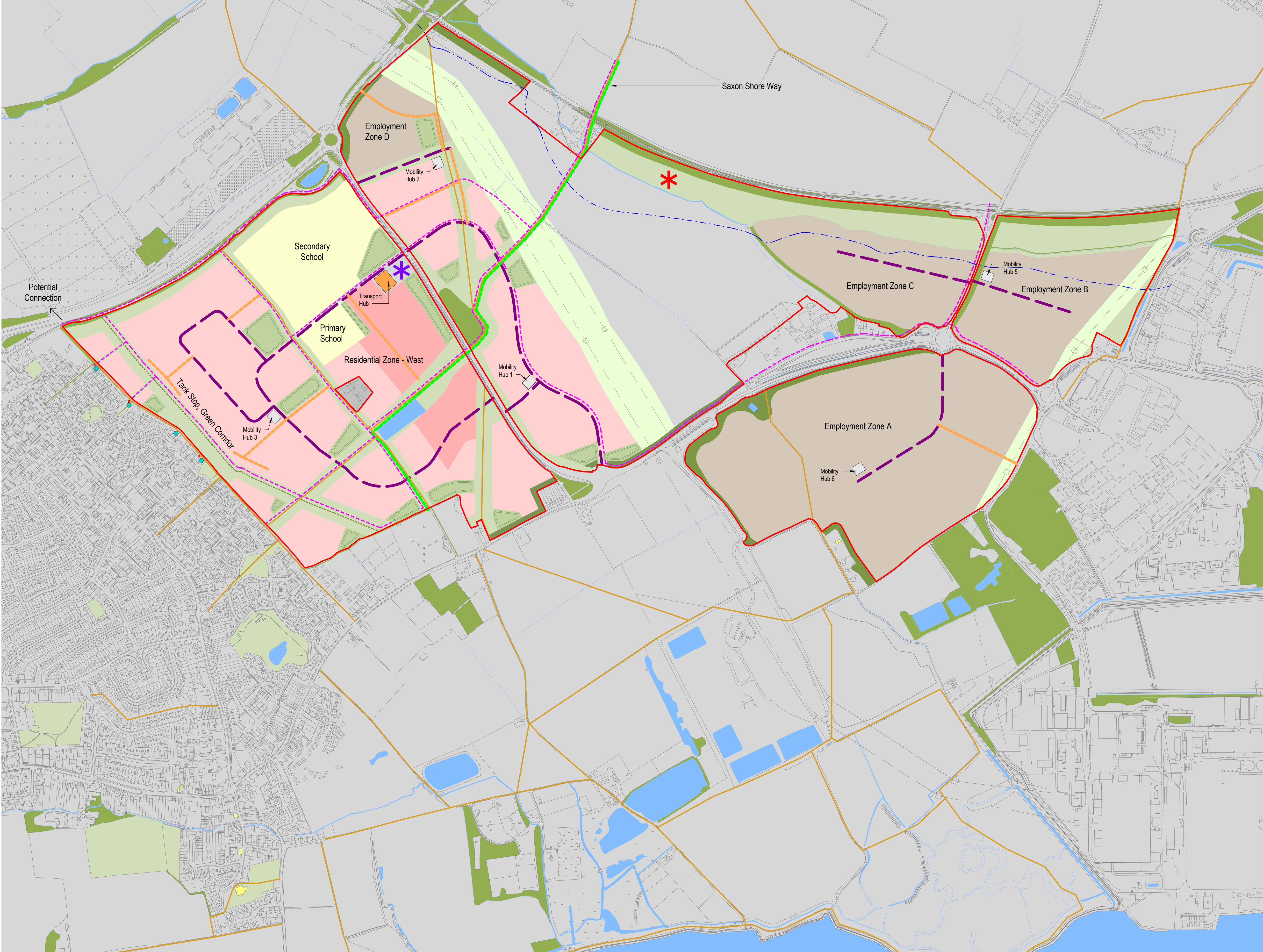
3a - Concept Proposals 'Phase 1'

Proposals Key

- Proposed Residential Area - Medium Density / High Density
- Proposed Employment Area
- Proposed Transport Hub
- Proposed School Locations
- Proposed Landscaped Buffer
- Proposed Green Corridor/POS
- Proposed Easement Under Overhead Powerlines
- Proposed Attenuation Basin
- Ponds (Existing and Proposed)
- Primary Vehicular Route
- Secondary Vehicular Route
- PROW Route
- WW2 Tank Stop Line
- Saxon Shore Way
- Proposed Cycle Route
- Flood Risk Line
- *

Potential Future Railway Station
- *

Retail Unit



25m 75m 175m

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P4	Minor graphic amendments to cycle path	11.07.24	KW	AR
P3	Minor graphic amendments to SUDs attenuation basins	09.07.24	CB	AR
P2	Attenuation basin added	05.07.24	KW	AR
P1	Layout updated following receipt of comments, WC 10.06.24	21.06.24	TD	AR
Rev.	Description	Date	Draw.	Chk.

Client:
Church Commissioners For England (CCfE)
Project:
Hoo St Werburgh
Drawing Title:
Concept Proposals (PHASE 1)
Drawing Status:
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Revision
P4

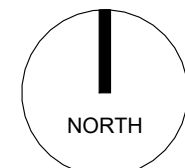
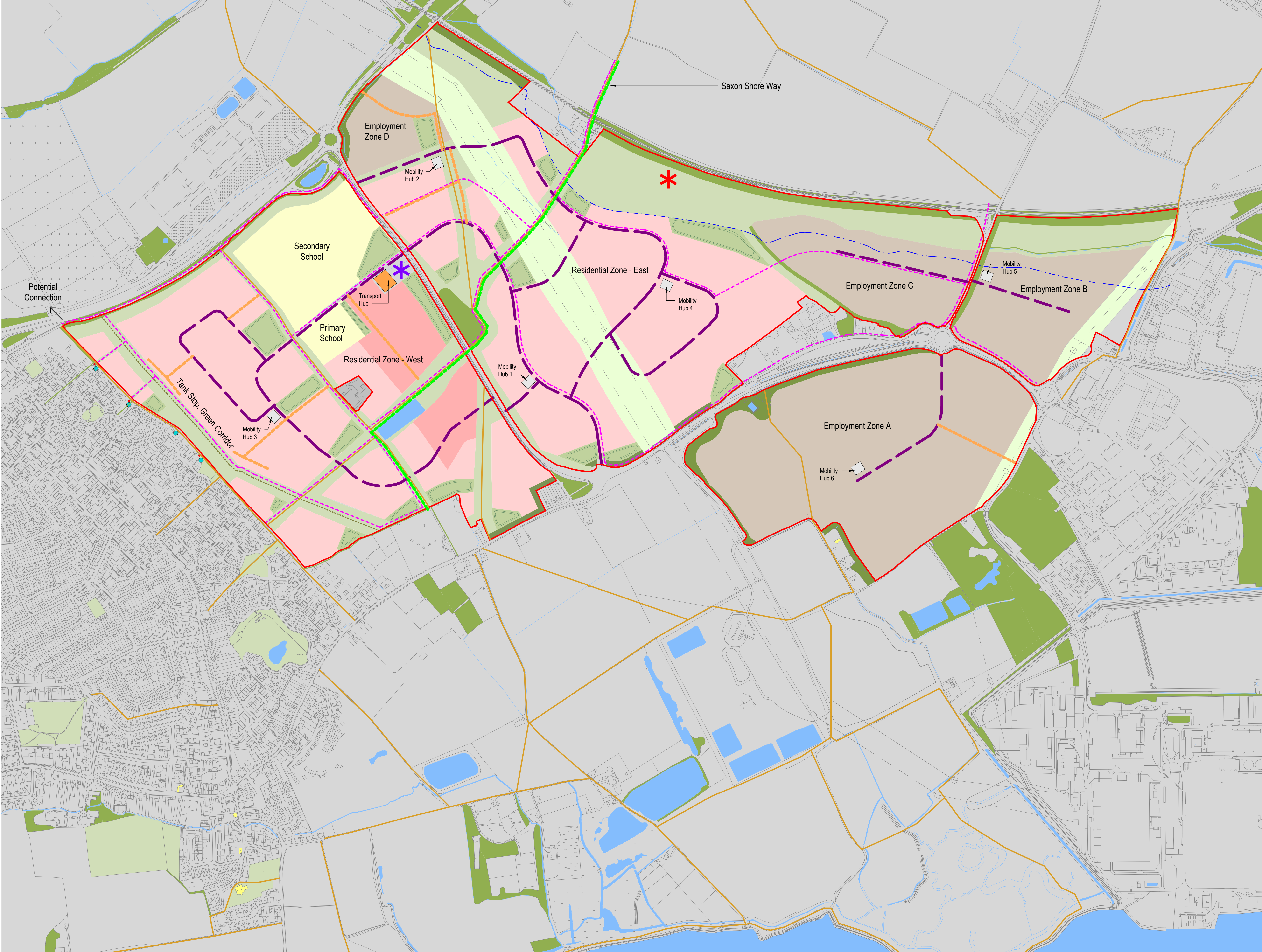
3b - Concept Proposals 'Phase 2'

Proposals Key

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- Proposed Employment Area
- Proposed Transport Hub
- Proposed School Locations
- Proposed Landscaped Buffer
- Proposed Green Corridor/POS
- Proposed Easement Under Overhead Powerlines
- Proposed Attenuation Basin
- Ponds (Existing and Proposed)
- Primary Vehicular Route
- Secondary Vehicular Route
- PROW Route
- WW2 Tank Stop Line
- Saxon Shore Way
- Proposed Cycle Route
- Flood Risk Line
- *

Potential Future Railway Station
- *

Retail Unit



25m 75m 175m

P4 Amendments to employment zone, cycle path and green corridor
P3 Minor graphic amendments to SUDs attenuation basins
P2 Attenuation basin added
P1 Layout updated following receipt of comments, WC 10.06.24

11.07.24 KW AR
09.07.24 CB AR
05.07.24 KW AR
21.06.24 TD AR

Rev. Description Date Draw. Chk.

Client:
Church Commissioners For England (CCfE)

Project:
Hoo St Werburgh

Drawing Title:
Concept Proposals (PHASE 2)

Drawing Status:
PRELIMINARY

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Drawn: CB
Checked: AR
Paper Size: A1
Scale: 1 : 5000

Revision
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06/10/24

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