



**REPRESENTATIONS
TO MEDWAY
COUNCIL
REGULATION 18
LOCAL PLAN
CONSULTATION**

Flanders Farm, Hoo

**Representation submitted
by Esquire Developments
Ltd**

September 2024

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I.0 INTRODUCTION

- I.1 These representations have been prepared by Esquire Developments Ltd. Esquire Developments is a multi-award-winning SME developer based in Longfield, Kent. These representations respond to Medway Council's (MC) Regulation 18 Local Plan Consultation July 2024.
- I.2 Esquire Developments has land interest across Medway Council and is currently delivering in High Halstow (35 dwellings), Rainham (46 dwellings) and Cliffe Woods (68 dwellings) and most recently completed a development for 20 Affordable Homes for MHS on Pier Road, Gillingham. Esquire Developments has a number of future land interests across the District including:
- I) Land adjacent to Fenn Street and Ratcliffe Highway – allocated within Policy Allocation AS6;
 - 2) Land at Stoke Road, Hoo – allocated within Policy Allocation HHH33;
 - 3) Land west of Edinburgh Road, Isle of Grain – allocated within Policy Allocation AS25;
 - 4) Flanders Farm, Hoo – not presently identified for allocation (Appendix A); and
 - 5) Pump and Bloor Farm, Rainham – not presently identified for allocation.
- I.3 These representations focus on Site 4, Flanders Farm, with Sites 1 – 3, and 5 being subject to separate representations by Esquire Developments.
- I.4 The Site was not previously submitted to the Call for Sites in November 2022, and subsequently was not allocated as part of the Regulation 18 emerging Local Plan. The Site is however available and deliverable within the Plan period for employment and retail uses and specifically for a new supermarket, potential drive thru restaurants and commercial spaces.
- I.5 A pre-application meeting has been sought with Medway to discuss the principle of the development of retail and employment uses on Site to support the existing and proposed residents of the Hoo Peninsula. The meeting is likely to take place following the submission of these representations.
- I.6 We recognise that the Regulation 18 Local Plan is still in the early stages of the overall plan making process and is providing a high-level option for a future spatial strategy. Therefore, these representations have been prepared in objective terms with reference to the relevant questions where appropriate.

- 1.7 Finally, these representations set out in detail the suitability of the Site and why the Site can be relied upon as suitable and appropriate locations for commercial development that can be delivered in a sustainable location and within the Plan period.
- 1.8 Esquire Developments is a member of the Kent SME Developers Network who have also submitted representations to this consultation. Esquire Developments endorses the representation prepared by the Network. Accordingly, these representations should be read in conjunction with the SME Network representations.

i) About Esquire Developments

- 1.9 Esquire Developments is a multi-award winning SME Housebuilder based in Longfield, Kent. Founded in 2011, it has quickly established itself through the delivery of high quality bespoke residential developments in Kent and Sussex. It was awarded Gold for Best Small House Builder in the Country 2020 by WhatHouse.
- 1.10 Esquire Developments has adopted a tailored approach to its developments adapting designs and layouts to reflect local characteristics and respect local community's needs. This is done through expert local knowledge and understanding of a place, but also positively engaging with the local community allowing for a focussed approach to planning, design and greater understanding of the needs of the local community.
- 1.11 Each development is bespoke and there are no fixed house types. This allows us to be totally flexible when it comes to the choosing the right mix and design of each home. This is reflected in the high-quality architecture and use of materials, but also quality of open spaces and the environment in which each development sits within.
- 1.12 Esquire Developments also delivers commercial buildings such as office space and children's nurseries to complement developments where local demand identifies such a need. This means our developments can meet a local community's needs in a number of ways, whether that is for people to live, work and play.
- 1.13 As an SME Housebuilder, Esquire Developments can expediently deliver a high-quality product that brings variation and choice to the market and complement volume housebuilders, but with a real community focus.

ii) Content of Representations

1.14 These representations are structured as follows:

Section 2.0: The Spatial Strategy.

Section 3.0: The Suitability of the Site.

1.15 Notwithstanding specific land interests, these representations have been prepared in objective terms and assessed against the prevailing planning policy and guidance framework set out within the National Planning Policy Framework (NPPF) (December 2023) and National Planning Policy Guidance (PPG) (March 2014 as amended).

1.16 In summary, the representations consider:

- In addition to housing, Medway also have a significant need for employment floorspace that needs to be met across the Plan period;
- There is a substantial need for retail/commercial/community uses on the Hoo Peninsula to meet the existing and future needs of residents.
- The Regulation 18 does not provide sufficient information, especially in relation to allocation yields, to accurately assess the 'soundness' of the Local Plan;
- Flanders Farm, Hoo, should be included as an allocation within the next stage of the emerging Local Plan for retail and commercial uses, in line with the retail hierarchy and transport vision within the Regulation 18.

2.0 THE SPATIAL STRATEGY

General Observations

- 2.1 The Regulation 18 Document is a progression and formalisation of the previous consultation in Autumn 2023, of 'Setting the Direction for Medway 2040'. The Regulation 18 Document indicates a direction of travel of the spatial growth and provides further information on proposed policies and options for a development strategy, the potential sites and broad locations that could form allocations for development in the new MCLP covering the period up to 2041. The document is supported by a proposals map which identifies a number of sites for allocation.
- 2.2 However, the document lacks the necessary supporting Evidence Base which demonstrates the potential capacity of the allocations. The Interim Sustainability Appraisal (ISA) set out that the Council's initial objective assessment of employment land identified a requirement for 274,663 sqm. The Council are looking to meet their employment needs and are being positive in their approach to delivering a sound Local Plan. We **support** this approach.
- 2.3 The Regulation 18 Document Proposals Map sets out the residential and non-residential allocations for future development across the Plan period. However, neither the Regulation 18 LP Document, nor the supporting documents set out the expected yield of each allocation. Therefore, it is not possible to assess the Local Plan wholly, with a significant amount of information missing.
- 2.4 Furthermore, we also note that a significant quantum of housing has been allocated on existing employment and retail sites, namely at the Medway City Estate and St Marys Island. Policy S11: Existing Employment Provision seeks to protect existing employment space unless the existing site is proven to be no longer viable and there is no market interest in the site for a period of 12 months. As such, the significant quantum of residential development proposed on employment sites is contradictory to the Vision and Strategic Objectives of the Local Plan. Nevertheless, if employment space is to be lost throughout Medway for residential development, additional land needs to be identified to meet the employment land needs across Medway.
- 2.5 Whilst we recognise that the Reg 18 document provides significant detail on the Development Management Policies that will shape future development within Medway until 2041, it is difficult to assess the spatial strategy with critical information still missing. A critical issue the

Council should consider is that the next iteration of the Local Plan will be the Regulation 19 Consultation. This means that limited changes can be made from the Regulation 19 document to the point of submission for Examination and only changes relating to the soundness of the Plan.

- 2.6 We consider there is a substantial risk to the Council's ability to progress with a sound plan by not providing a sufficient evidence base now, with an indication on whether Medway can meet their employment requirements and will create a scenario where it seeks to make substantial changes post the Regulation 19 Consultation.
- 2.7 Recent nearby LPA's have sought such changes (inc. Maidstone Borough and Tunbridge Wells Borough) only for the Inspectors examining those plans having queried the suitability of such changes and if they relate to 'soundness' of the plan and if not, why this change is being proposed. We previously proposed that the Council should undertake a Regulation 18b Consultation, which provides a preferred strategy that is underpinned by a proper evidence base including a completed LAA, Sustainability Appraisal and Infrastructure Delivery Plan. This would strengthen the Regulation 19 Local Plan and will potentially avoid a protracted
- 2.8 On this basis, we suggest that the Council undertakes a Regulation 18b Consultation to strengthen the Evidence Base, and provide the supporting evidence required to prepare a 'sound' Plan.

Summary

- 2.9 We support Medway in the allocation of sites for non-residential development to assist in meeting their employment land requirement. However, the details on the potential yield of each allocation are required to accurately assess if Medway is meeting its need.
- 2.10 The emerging Local Plan protects existing employment land from loss unless there is evidence of inactivity. However, a number of residential allocations are located on existing employment sites. Therefore, if these sites are to be lost to residential, then additional land above what is already identified is required to meet Medway's needs.

3.0 THE SUITABILITY OF THE SITE

- 3.1 Esquire Developments has a number of future land interests across the District including:
- 1) Flanders Farm, Hoo – not presently identified for allocation (Appendix A).
- 3.2 The Site is located to the north of Peninsula Way (A228) and the village of Hoo. The Site comprises a roughly rectangular parcel circa. 13.8ha and is currently in use for commercial fruit orchards.
- 3.3 The Site is boarded to the west by the Deangate Ridge Recreation Ground and BMX track. To the southwest of the site is Homeleigh Garden Centre and industrial development along the Ratcliffe Highway. To the north and north east of the Site is open agricultural fields. The site is located on the strategic highway network, connecting the Hoo Peninsula with the rest of Medway.
- 3.4 The Environmental Agency (EA) online flood-mapping tool shows that the Site is located entirely within Flood Zone 1 – the lowest probability of fluvial/tidal flooding. There is a low risk of surface water flooding occurs along the northern and western boundary which results in a 0.1-1% chance each year.
- 3.5 There are no listed buildings on or located within close proximity to the Site. There are no conservation areas within close proximity to the Site. A number of listed buildings are located to the south of the Site, which form part of the residential built form of Hoo St Werburgh, however development at the Site will not impact on these listed buildings given the significant built form separating the Site from the heritage assets.
- 3.6 Part of the Site is located within 400m of the Chattenden Woods and Lodge Hill, therefore within the impact zone of the Site of Special Scientific Interest (SSSI).
- 3.7 A number of PRowS are located to the south of the Site, namely RS112 and RS110 which connect the Site to the wider PRow network, the village of Hoo and Saxon Shore Way.

Emerging Proposals

- 3.8 The emerging development of the Site comprises 1No. Food Retail unit, 2No. drive-thru units, 12No. industrial units of varying sizes and associated parking. An emerging proposed site location plan is included within **Appendix B** which demonstrates how the Site could come forward.

- 3.9 As set out above, the proposals presented are yet to be considered within the pre-application engagement with the Council. Initial technical input is ongoing to inform the emerging proposals, however at this current time no technical constraints have been identified time an application is submitted, supporting information will also be submitted in support of the scheme.

Suitability of the Site

- 3.10 The Regulation 18 Local Plan identifies a significant amount of future residential development to be located on the Hoo Peninsula. This is in addition to the substantial residential development that is currently being built out or completed over the past 10 years. In light of no up to date Development Plan, significant unplanned development has occurred on the Peninsula, without the necessary infrastructure to support the growth.
- 3.11 The emerging Local Plan recognises that new strategic growth locations, may also need to provide additional retail/community provision to support development. An example of this is the Hoo Peninsula, where there is currently a limited offer of retail and wider services. Para 8.3.5 states that residents generally travel to Strood or Bluewater for their main grocery shop and comparison shopping. The current village is constrained for further expansion and has recently lost some key services. Therefore, should further significant growth come forward on the Hoo Peninsula, 'provision for retail, wider commercial and community uses would be essential for sustainable development' (Para 8.3.5, Reg 18 Local Plan).
- 3.12 This is also reflected by local residents and through Esquire Developments ongoing engagement with the local community on primarily residential led schemes on the Peninsula itself, the lack of a food supermarket is the most common complaint in respect of wider services on the Peninsula.
- 3.13 Section 8.12 of the Reg 18 Local Plan goes on to state that the Council has identified the potential for significant development on the Hoo Peninsula. As such, the Council recognises that although the strategy for the Hoo Peninsula is yet to be finalised, but if major growth is expected in this area, local services including retail will need to be expanded.
- 3.14 The retail evidence base notes that that the current provision for the Hoo Peninsula is limited and the reliance on shops off the Peninsula and delivery services. The Plan states that this is unsustainable (Para 8.12.2). Furthermore, Policy S22 Hoo Peninsula requires support

infrastructure and centres to provide for the needs of new residents. Therefore, current deficiencies in provision provides a unique opportunity to ensure appropriate provision for residents but also support efficiencies and sustainability.

- 3.15 This is further supported by the Vision for Access and Movement in Medway which targets a reduced car dependency on the Hoo Peninsula and a higher level of self-containment to facilitate local living while employment opportunities are available on the Peninsula.
- 3.16 On this basis, the proposed development at Flanders Farm presents a unique opportunity to address the significant concerns that currently existing across the Peninsula, whilst also unlocking the significant future development potential to allow Medway to reach their housing requirement.
- 3.17 In addition, if existing employment land is to be lost to residential development to assist Medway in meeting their needs, additional employment space will be required to ensure that the employment land requirement is also considered with the same importance as Medway's housing targets.
- 3.18 Flanders Farm provides a combination of retail and employment space, which will help to address Medway's Vision for Access and Movement by improving the self-containment of the Peninsula. Furthermore, by providing the right facilities on the Peninsula to meet the existing future requirements, the current volume of vehicles travelling from the Peninsula to reach services within the rest of Medway will significantly reduce. This will have a positive multiplier effect on the remainder of Medway.

Summary

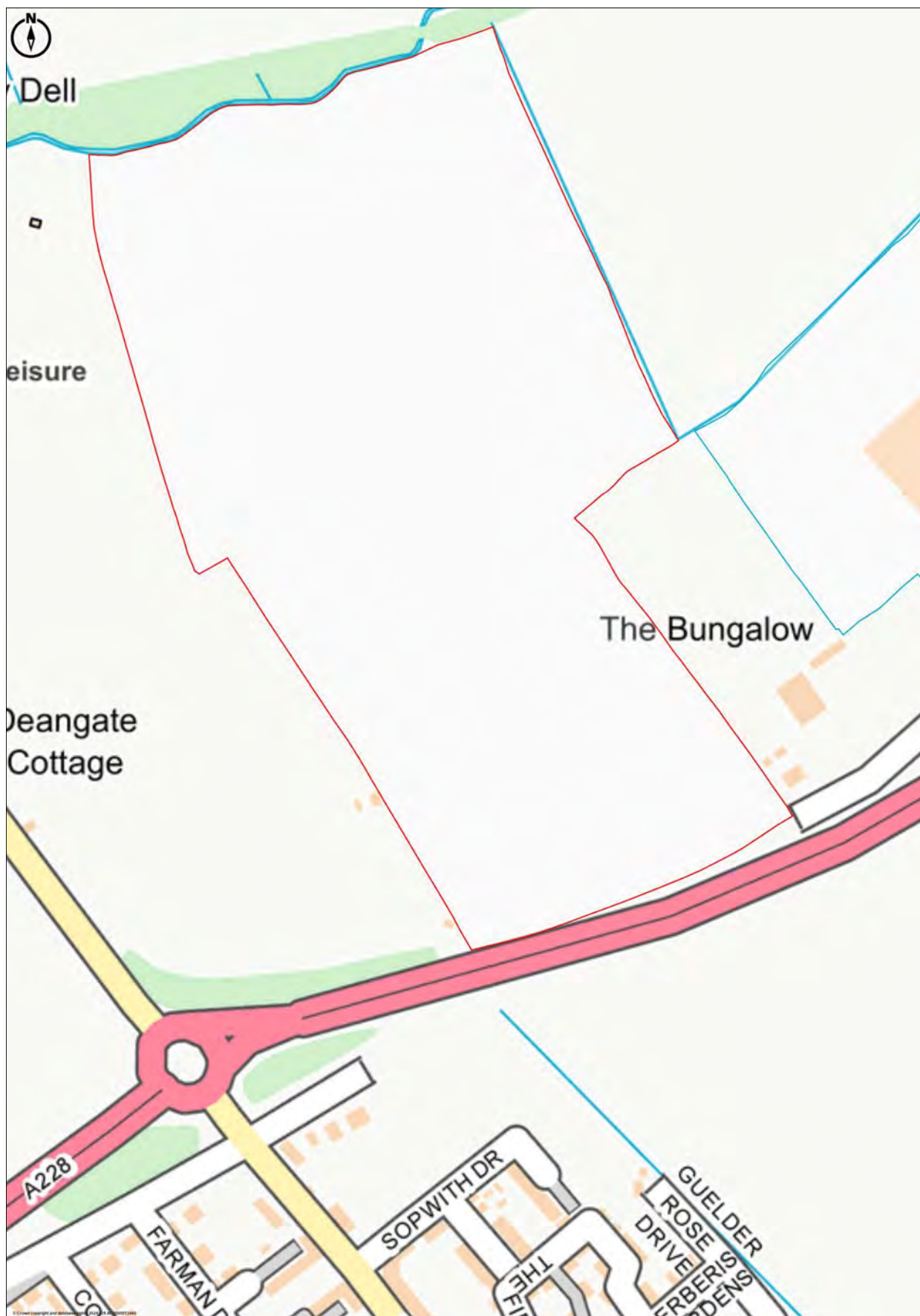
- 3.19 We have set out above the potential benefits of allocating the Site for retail and employment development and set out why the Site should be allocated within the next stage of the Regulation 18 Plan.
- 3.20 The Site presents an excellent opportunity for allocation and would support the focus of the retail and town centres which requires retail, commercial and community driven development in order to support the level of growth currently planned on the Hoo Peninsula.
- 3.21 The Site is not only sustainable in its own right, located on the strategic road network, servicing the Hoo Peninsula, but also unlocks significant development to come forward in a sustainable fashion. Nevertheless, the Site is suitable and deliverable and is being brought

forward by an SME housebuilder with an excellent track record of design and delivery in Medway.

Appendix A

Flanders Farm, Hoo

Scale: 1:2500



Appendix B

Proposed Site Location Plan – Option I



REPRESENTATIONS TO MEDWAY COUNCIL REGULATION 18 LOCAL PLAN CONSULTATION

**Representation submitted
by Esquire Developments
Ltd**

**Rainham Parkside
Village**

September 2024



ESQUIRE

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1.0 INTRODUCTION

- 1.1 These representations have been prepared by Esquire Developments Ltd. Esquire Developments is a multi-award-winning SME developer based in Longfield, Kent. These representations respond to Medway Council's (MC) Regulation 18 Local Plan Consultation July 2024.
- 1.2 Esquire Developments has land interest across Medway Council and is currently delivering in High Halstow (35 dwellings), Rainham (46 dwellings) and Cliffe Woods (68 dwellings) and most recently completed a development for 20 Affordable Homes for MHS on Pier Road, Gillingham. Esquire Developments has a number of future land interests across the District including:
- 1) Land adjacent to Fenn Street and Ratcliffe Highway – allocated within Policy Allocation AS6;
 - 2) Land at Stoke Road, Hoo – allocated within Policy Allocation HHH33;
 - 3) Land west of Edinburgh Road, Isle of Grain – allocated within Policy Allocation AS25;
 - 4) Flanders Farm, Hoo – not presently identified for allocation; and
 - 5) Rainham Parkside Village – not presently identified for allocation (Appendix A).
- 1.3 These representations focus on Site 5, Rainham Parkside Village, with Sites 1 – 3 and 4 being subject to separate representations by Esquire Developments.
- 1.4 As part of the Call for Sites process, part of the site (previously known as Pump Farm) was submitted (Ref: RN8) as part of a residential-led mixed-use development. It is estimated that alongside the non-residential uses proposed, the Site could deliver circa.500 dwellings. The remainder of the Site, previously known as Bloor Farm, was not previously submitted to the Call for Sites process. The site has been subject to a dismissed Appeal in 2019.
- 1.5 The Local Plan assessed three different spatial strategies; Urban Focus, Dispersed Growth and Blended Strategy. Site RN8 was included within the Dispersed Growth Strategy, however, was discounted from the Blended Strategy. As such, the Site is currently not allocated within the Regulation 18 Local Plan.
- 1.6 Therefore, these representations provide a comprehensive assessment of the Site as a whole. In the first instance, an assessment of local community infrastructure was undertaken to assess the current requirements of the area, this included an assessment of the residential development that has come forward over the past 10 years, whilst no up to date Local Plan

has been in place. Furthermore, these Representations address the reasons for the Site previously being rejected as an allocation within the Reg 18 Local Plan.

- 1.7 We recognise that the Regulation 18 Local Plan is still in the early stages of the overall plan making process and is providing a high-level option for a future spatial strategy. Therefore, these representations have been prepared in objective terms with reference to the relevant questions where appropriate.
- 1.8 Finally, these representations set out in detail the suitability of the Site and why the Site can be relied upon as a suitable and appropriate location for residential development that can be delivered in a sustainable location and within the Plan period.
- 1.9 Esquire Developments is a member of the Kent SME Developers Network who have also submitted representations to this consultation. Esquire Developments endorses the representation prepared by the Network. Accordingly, these representations should be read in conjunction with the SME Network representations. This includes specific support for the allocation of a sufficient number of small sites and the inclusion of the small sites policy to be part of the emerging Local Plan.

i) About Esquire Developments

- 1.10 Esquire Developments is a multi-award winning SME Housebuilder based in Longfield, Kent. Founded in 2011, it has quickly established itself through the delivery of high quality bespoke residential developments in Kent and Sussex. It was awarded Gold for Best Small House Builder in the Country 2020 by WhatHouse.
- 1.11 Esquire Developments has adopted a tailored approach to its developments adapting designs and layouts to reflect local characteristics and respect local community's needs. This is done through expert local knowledge and understanding of a place, but also positively engaging with the local community allowing for a focussed approach to planning, design and greater understanding of the needs of the local community.
- 1.12 Each development is bespoke and there are no fixed house types. This allows us to be totally flexible when it comes to the choosing the right mix and design of each home. This is reflected in the high-quality architecture and use of materials, but also quality of open spaces and the environment in which each development sits within.

- I.13 Esquire Developments also delivers commercial buildings such as office space and children's nurseries to complement developments where local demand identifies such a need. This means our developments can meet a local community's needs in a number of ways, whether that is for people to live, work and play.
- I.14 As an SME Housebuilder, Esquire Developments can expediently deliver a high-quality product that brings variation and choice to the market and complement volume housebuilders, but with a real community focus.

ii) The Role of SMEs

- I.15 This Section summarises the importance currently being placed by Central Government on the role of Small to Medium Enterprises (SMEs) in the housebuilding Industry and demonstrates the vital role of SME Housebuilding will play in complementing volume housebuilders to deliver the Council's housing requirements and in term the national housing target. A detailed statement on the Role of SMEs is included within Appendix B.
- I.16 The role of SMEs has been fully recognised by Central Government (both in the House of Commons and the House of Lords) and the wider Industry (HBF, NLP) in how important their role is to helping deliver the 300,000 homes per annum target. Statistics monitoring completions across the UK confirm Housebuilding has not achieved this level of growth since 1977-78, where 314,090 dwellings were delivered. Since this, housing completions have fallen short of the 300,000 dwelling target year after year.
- I.17 Constraints to SMEs have been identified, including that the plan-led system is orientated away from encouraging SMEs into the market and access to finance. In 1998, small builders were responsible for 4 in 10 new build homes (40%). Today, it is just 12%. The average permissioned housing scheme has increased in size by 17% since 2007, suggesting that many allocated sites are out of reach of smaller companies. During this time (2007-09), 33% of small companies ceased building homes. Returning to 2007 home builder levels could see housing supply boosted by 25,000 dwellings per year.
- I.18 Homes England identified that the decline of SME Housebuilders and the result being the house building market is increasingly made up of a small number of house builders has led to insufficient diversity, competition and capacity. In order to encourage SME Housebuilders, Homes England are seeking to improve opportunities for SMEs to access land and introduce simpler tender and legal documents on smaller sites to make the bidding process easier.

- I.19 On the other hand, access to finance is also a significant constrain for SME Housebuilders. The Aldermore Group, a banking specialist in finance to small businesses, have stated that smaller developers continue to struggle with access to finance. Furthermore, unless more is done by lenders to increase funding to smaller regional developers, the potential for the industry to reach the Government's housing target of 300,000 per annum is less likely.
- I.20 The December 2023 NPPF has provision within it to specifically address this issue with a clear direction to Local Planning Authorities that 10% of all housing requirements should be on sites that are 1ha or less i.e. approximately 35 dwellings and under per site. This is aimed at SME developers who deliver at or around this scale. The NPPF gives weight to the fast delivery of high-quality housing can be best achieved by ensuring an adequate supply of small and medium sized sites, which can help to delivery homes in the short-medium term. SME Housebuilders are more flexible than a volume housebuilder and therefore can deliver homes at a scale and quality that reflect the characteristics of the location.
- I.21 As such, SMEs help diversify the market and deliver choice and quality, but they can also deliver at a quicker pace than larger sites. This means that by supporting SMEs into the Wealden market, can strengthen Housing delivery and ensure a steady supply of deliverable sites.
- I.22 The revision made to the NPPF in July 2021 and December 2023, accommodated a number of changes. This included a change in emphasis to good design and how good design was fundamental to what the planning and development process should achieve. Furthermore, it confirmed development that is not well designed, should be refused. Significant weight should be given to development which reflect local design policies and/or promote high levels of sustainability or help raise the standard of design more generally in an area. SMEs are well placed in this regard to meet these challenges successfully.
- I.23 In addition, the Levelling Up and regeneration Bill: Reforms to National Planning Policy Consultation (Dec 2022) acknowledged that the NPPF as currently drafted, is not have the desired effect for SMEs and that this specific matter will be addressed. Para 70 was therefore expanded within the Dec 2023 NPPF to encourage developers to divide the responsibility of larger sites to help to speed up the delivery of homes.
- I.24 Most recently, a Ministerial Statement was released by the new Labour Government (July 2024) which sets out the proposed amendments to the NPPF, requiring Local Planning Authorities to meet their Standard Method, which has also been revised. The revision to the

Standard Method has increased the housing target to 370,000 homes per annum. The draft NPPF is currently out for consultation, concluding at the end of September 2024. There has been no amendment to the wording of the previous Para 70 but has been renumbered to Para 71.

- I.25 Overall, the role of SMEs has been fully recognised by Central Government and the wider Industry in how important their role is to helping deliver the national 370,000 homes per year target.

iii) Content of Representations

- I.26 These representations are structured as follows:

Section 2.0: The Spatial Strategy.

Section 3.0: The Suitability of the Site.

- I.27 Notwithstanding specific land interests, these representations have been prepared in objective terms and assessed against the prevailing planning policy and guidance framework set out within the National Planning Policy Framework (NPPF) (December 2023) and National Planning Policy Guidance (PPG) (March 2014 as amended).

- I.28 In summary, the representations consider:

- We understand the constraints of the District impacting the ability to meet their housing requirement, however, in light of the recent Government announcement, we encourage Medway to ensure that they are meeting their housing requirement in full;
- Therefore, additional land needs to be allocated in order to meet Medway's full housing need;
- We consider the site represents a unique opportunity to bring forward an SME Consortium site that is genuinely SME led that will deliver at pace and with high quality.

2.0 THE SPATIAL STRATEGY

General Observations

- 2.1 The Regulation 18 Document is a progression and formalisation of the previous consultation in Autumn 2023, of 'Setting the Direction for Medway 2040'. The Reg 18 Document indicates a direction of travel of the spatial growth in the District and provides further information on proposed policies and options for a development strategy, the potential sites and broad locations that could form allocations for development. The new MCLP covers the period from 2025 to 2041. The document is supported by a proposals map which identifies a number of sites for allocation.
- 2.2 The Executive Summary of the Reg 18 identifies a housing need, based on the Government's Standard Method calculation for 1,658 dwellings per annum¹, which equates to around 28,000 new homes across the Plan period. It is acknowledged that this scale of growth will involve significant change across Medway. The Council are looking to meet their housing needs and are being positive in their approach to delivering a sound Local Plan. We recognise and **support** this approach.
- 2.3 However, taking the consultation as a whole, the Regulation 18 consultation lacks the necessary supporting Evidence Base that underpins the Preferred Strategy, the allocations, and required infrastructure to support the level of growth in Medway. As such, the plan is considered **unsound** as drafted. This is explored in greater detail below.
- 2.4 The previous consultation named Setting the Direction for Medway 2040 Document including every submitted site within the 4No. development scenarios. Although it was a useful opportunity to understand the sites submitted, there were 2 key issues which meant that it was difficult to comment:
1. No one strategy offers the ability to meet the identified level of growth required. Accordingly, a blended strategy is required. No such blended strategy was however put forward as an option.

¹ The current NPPF consultation currently suggests Medway's Housing Need will be amended to 1,644 to respond to the change in calculating the standard method. We consider Medway should meet whatever the standard method calculates Medway's needs to be as per the proposed NPPF guidance

2. The lack of a LAA assessing the suitability of sites that underpin each strategy is a significant omission and means that it is impossible to conclude on the suitability of any given strategy. The Local Plan acknowledges that sites are likely to not be taken forward in the next iteration. This means the overall numbers associated with each strategy is incorrect and there is further uncertainty of the suitability of each strategy.
- 2.5 This current Regulation 18 document provides a 'Blended Strategy' that is to be taken forward, and therefore in some way addresses our previous first point set out above. The 'Blended Strategy' promotes a brownfield first approach supporting urban regeneration, complemented by greenfield sites in suburban and rural locations to provide for wider housing choice. As the preferred indicative approach at this stage, more details of how this strategy could look, is presented within the Proposals Maps.
- 2.6 However, as previously stated within point 2 above, the omission of a LAA assessing the suitability of the sites included for allocation within the Proposals Map remains a significant omission. The Blended Strategy provided a combination of the two previous 'Urban' or 'Rural' strategies. There is currently no evidence provided that suggests why certain urban and/or rural sites were allocated or rejected. Furthermore, of the sites that were selected, the lack of LAA assessing individual sites yields including their ability to deliver other policy requirements, such as Affordable Housing, 10% BNG, and the availability of the sites is not included within the supporting documents.
- 2.7 On this basis, it is impossible to conclude on the suitability of the 'Blended Strategy' without understanding if the proposed allocations will provide sufficient new housing to meet their requirements. Accordingly, the plan fails to be sound in this regard, as it has not been 'justified' through the Evidence Base and it has not been proven that the plan will be 'effective' i.e. that the sites identified can and will be delivered to meet the housing needs.
- 2.8 Whilst we recognise that the Regulation 18 document provides significant detail on the Development Management Policies that will shape future development within Medway until 2041, it is difficult to assess the spatial strategy with this critical information and Evidence Base still missing.
- 2.9 A critical issue that the Council should consider is that the next iteration of the Local Plan will be the Regulation 19 Consultation. This means that limited changes can be made to the submission document for Examination and only changes relating to the soundness of the Plan.

- 2.10 We consider there is a substantial risk to the Council's ability to progress with a sound plan by not providing a sufficient evidence base now, with an indication on whether Medway can meet their housing requirements and will create a scenario where it seeks to make substantial changes post the Regulation 19 Consultation.
- 2.11 Recent nearby LPA's have sought such changes (inc. Maidstone Borough and Tunbridge Wells Borough) only for the Inspectors examining those plans having queried the suitability of such changes and if they relate to 'soundness' of the plan and if not, why this change is being proposed. We previously proposed that the Council should undertake a Regulation 18b Consultation, which provides a preferred strategy that is underpinned by a proper evidence base including a completed LAA, Sustainability Appraisal and Infrastructure Delivery Plan. This would strengthen the Regulation 19 Local Plan and will potentially avoid a protracted examination or potential for re-consultation of key soundness matters. We consider a Regulation 18b consultation should be undertaken.
- 2.12 An Interim Sustainability Appraisal has been included within the Consultation and identifies the Sites that have been assessed as part of the Call for Sites as suitable and provides some clarification on sites that have been selected or rejected for allocation. However, it appears that no assessment has been undertaken to understand the potential development yields of the selected sites nor on what policy basis these sites are deemed more appropriate over others. An assessment of the Interim Sustainability Appraisal is set out below but we would expect to see a housing topic paper which clearly identifies the site selection criteria of the sites selected and how and why they achieve the wider plans objectives.
- 2.13 At present there is no LAA or Infrastructure Delivery Plan or site selection criteria paper that has been produced as part of this consultation. Therefore, it is impossible to assess if and how the spatial strategy will meet the housing requirements of Medway

Interim Sustainability Appraisal - Housing Requirement

- 2.14 The Interim Sustainability Appraisal (ISA) confirms in para 3.1.2 that the local housing need calculation for Medway is a minimum of 1,658 homes per year, in accordance with the Government's Standard Method Calculation. Over the Plan period from 2025 – 2041 (16 years), this equates to a need to deliver 26,528 homes.
- 2.15 A 5% buffer has been applied to the housing requirement to allow for market flexibility, resulting in an approximate need for 27,854 homes. The ISA states that after considering

existing supply commitments and an anticipated windfall supply, this results in a required yield of 22,491 homes to be delivered through the emerging Local Plan. There is no evidence provided to support the number of existing supply commitments or anticipated windfall supply based on previous delivery.

- 2.16 The recent Government announcement (30 July 2024) set out the new consultation of the NPPF. The new NPPF sets out a number of significant changes from the previous December 2023 version, revoking the majority of amendments made in December 2023, and proposing significant changes to the NPPF, including but not limited to the requirement for LPA's to meet their housing need, unless hard constraints (such as Flood Risk) state otherwise, and changes to the Standard Method methodology. As such, the proposed Standard Method for Medway has marginally decreased by 1% from 1,658 dpa to 1,644 dpa (a decrease of 14dpa). This is still the subject of consultation, with the NPPF expected to be published in Autumn 2024. For the purpose of this consultation, we have assessed the spatial strategy based on the current Standard Method.
- 2.17 As part of the Government announcement, the Ministerial Statement set out the requirement for Local Planning Authorities to plan positively and are required to meet their housing needs.
- 2.18 Furthermore, a request from Gravesham Borough Council (GBC) has been submitted to Medway Council to accommodate 2,000 additional homes to assist GBC in addressing their unmet needs. Gravesham Borough is highly constrained and is therefore unable to meet their own housing needs. Medway Council have requested further information from GBC to evidence the need for 2,000 homes. Therefore, should this requirement be justified, Medway will be required to allocate additional land to accommodate an additional 2,000 homes. It is not yet known whether Tonbridge and Malling Borough Council will request for their unmet need to be met within MC.

Call for Sites

- 2.19 The ISA provides a summary of the sites that have been submitted as part of the Call for Sites process and includes a summary column on whether the site has been selected for allocation or not. In the absence of the yields of the proposed allocations, it is difficult to be certain that the proposed allocations will meet the housing requirement. On this basis, it is difficult to assess if the Plan can be found sound.
- 2.20 The Medway Call for Sites process ran between November 2022 until February 2023. A total of 447 sites have been identified by the Council through the LAA process and undergone an

initial filtering process. As a result of the filtering process, a total of 359 reasonable alternative sites for assessment were considered. The sites have the potential to accommodate new residential and employment development.

- 2.21 The Council have further categorised the sites, by identifying strategic sites. Strategic sites comprise at least 10ha and could deliver at least 500 new homes. Strategic employment sites comprise over 75ha. A total of 24 strategic sites (19 residential-led and 5 employment-led) have been identified.
- 2.22 The ISA assessed the sites against the Local Plan Objectives and Development Management Policies and rejected the unsuitable sites. A total of 15 strategic sites were selected, alongside 202 non-strategic sites selected for allocation for both residential and employment development.

Local Plan Allocations

- 2.23 The Regulation 18 Local Plan allocates 234 sites for development within Medway. This includes 17 sites allocated for non-residential development, land for park homes, and a care home. This equates to 217 sites for residential led development. As such, we appreciate the attempts made by the Council to identify sites within the emerging Local Plan, however insufficient evidence has been provided to support the allocations, and their ability to deliver the number of homes required to meet Medway's Standard Method.
- 2.24 On this basis, we have undertaken an assessment of the allocated sites based on the information provided within the Interim Sustainability Assessment. As part of our assessment, we have considered sites that are to be delivered before the start of the Plan period, sites with an unknown availability status (as per the Land Availability Assessment Interim Report, Appendix F Map of Sites – Unknown Availability, October 2023), and sites located on active employment sites. Therefore, based on the above criteria, a number of allocated sites have been discounted from the total housing land supply. A summary of the assessment is included at Appendix C.
- 2.25 That being said, of the sites that we assess as available and suitable to be delivered within the Plan period, the Council are yet to undertake and publish an assessment of the likely yields of each site to ensure that each site is capable of delivering the yields submitted as part of the Call for Sites process. We question the yields submitted as part of the CfS, given that the submission was prior to the requirement for 10% BNG and the update of the BNG metric which is more stringent than previous assessments.

- 2.26 In addition to the housing requirement, the ISA also identifies an employment floorspace requirement of 274,663sqm that needs to be met in order to address the needs of businesses within the District. As stated above, a number of residential allocations have been proposed within high density employment areas, for example, the Medway City Estate and St Mary's Island. Emerging Policy S11: Existing Employment Provision, seeks to protect existing employment space, unless the existing site is proven to be no longer viable and there is no market interest in the site for a period of 12 months. Given the significant employment floorspace requirement, and the uncertainty of the quantum of development to be expected on the employment allocations, it is not possible to conclude if the Local Plan will result in a net decrease or increase of employment floorspace across the Plan period. As such, the significant quantum of residential development proposed on employment sites is contradictory to the Vision and Strategic Objectives of the Local Plan.
- 2.27 We have assessed the allocated sites, against the potential yield provided by the promoter through the Call for Sites process. In total, 234 sites were allocated, including 217 sites for residential-led development, providing 27,033 dwellings. Table 2.1 sets out the cumulative discounted sites by reason below.

Table 2.1: Assessment of Allocated Sites

Reason	Total Housing Supply
Allocated Sites by Reg 18	27,033 (217 Sites)
Unknown Availability	-2,194 (-57 Sites)
Built Out Prior to April 2025	-30 (-5 Sites)
Applications Withdrawn or Expired	-337 (-17 Sites)
Existing In-Use Employment Sites	-5,080 (-20 Sites)
Total Suitable and Available Allocations	19,392 (120 Sites)

- 2.28 Furthermore, it is also important to draw attention to the number of sites allocated within current retail areas. It is unclear whether the retail element of the allocation would remain with subsequent housing built on top. As this is still unclear, we have not discounted the number of sites based on loss of potential retail.
- 2.29 We also question if the submitted yield of the sites is a realistic prospect. Significant time (18 months) has passed since the sites were originally submitted to the Call for Sites process. As such, what evidence has been presented that these sites take into account the requirement to deliver 10% BNG, alongside the other Development Management Policies. Our experience is that meeting the 10% requirement is having a substantial impact on either the layout/yield of a development or has a substantial impact on viability for off-site credits. Has the evidence base taken this into consideration?

- 2.30 Whilst MC has undertaken extensive work, based on our assessment, we consider only 24,755 homes, including a windfall allowance of 3,000 homes, and 2,363 dwellings already committed over the Plan period has been identified. This would achieve only 1,547dpa. On this basis, there is a substantial shortfall of 3,099 dwellings, amounting to 194 dpa and, coupled with Windfall allowance represents over 6,099 unidentified dwellings to meet the housing needs of the District. Table 2.2 sets out the housing supply at Regulation 18 consultation stage.

Table 2.2: Housing Supply Reg 18 consultation stage

Source of Housing Supply	Number of dwellings
Commitments (net)	2,363
Windfall (including suitable SHELAA sites located within boundaries – not allocated)	3,000
Local Plan draft allocations*	19,392
Total Housing Supply	24,755
<i>Dwellings per Annum</i>	<i>1,547</i>
Total Housing Requirement (with 5% buffer)	27,854
<i>Total Shortfall</i>	<i>3,099</i>

*Our Assessment of Local Plan Draft Allocations

Windfall Allowance

- 2.31 The ISA states that as part of meeting their housing requirement, 5,363 homes will be delivered through extant permissions and windfall development.
- 2.32 The latest AMR (December 2023) includes a windfall allowance within the projected housing delivery equivalent to 250 homes per annum from 'Year 4 – 2026/27'. Over the Plan period, this equates to c. 3,000 homes. There is no evidence to support the delivery of 250 windfall dwellings per annum. This number is projected based on previous windfall delivery of large and small sites over the past 10 years outside of any plan-led system. The remaining 2,363 homes are therefore the existing supply commitments that are to be delivered in 2025 that have an extant permission. There is no evidence to support this number.
- 2.33 Para 72 of the NPPF states that where windfall sites form part of the anticipated supply, there should be compelling evidence provided by the Council that they will provide a reliable source of supply. Windfall allowance should be realistic, having regard to the LAA, historic windfall

rates, and expected future delivery. Presently, MC rely solely on historic windfall rates and do not provide any robust evidence that the current rate of delivery is expected to continue.

- 2.34 The assessment of potential future windfall rates, outlined within the Medway AMR (December 2023, Volume 2) identified a windfall allowance of 250 dwellings per annum based on an average over the past 10 years. We consider that this is an inaccurate reflection of the true windfall history, and the use of previous windfall delivery rates are wholly misleading when considering the significantly out of date adopted Development Plan.
- 2.35 The Medway Local Plan (2003) is significantly out of date. Medway has been unable to demonstrate a 5-year housing land supply for a substantial number of years. As a result, most sites now coming forward in Medway are speculative in nature and contrary to the Development Plan but engage the tilted balance in presumption of sustainable development as set out within para 11d) of the NPPF. This would therefore constitute windfall development.
- 2.36 As such, it is not possible to assume that the current rate of delivery will continue to be delivered. On this basis, it is not accepted that an additional 3,000 homes will be delivered within the Plan period, and as such, the shortfall of delivery increases to 6,099 dwellings, equating to a need for an additional 381dpa to meet MC's requirement.
- 2.37 Notwithstanding the above, additional sites are necessary to meet the housing need requirement for Medway and reduce the reliance on windfall development. It is clear that substantial land will need to be required in order to meet Medway's housing requirement, and therefore Braeburn Village should be allocated to assist in helping to meet the housing need whilst also protecting existing employment area across Medway.

Duty to Cooperate

- 2.38 The NPPF, which is currently out for consultation, continues to ensure that LPAs are under a Duty to Cooperate with each other, and will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, will be delivered.
- 2.39 As part of the Duty To Cooperate, Gravesham Borough Council has notified Medway Council of an estimated unmet housing need of 2,000 homes through responses to consultations and duty to cooperate meetings. It is unsure what evidence currently underpins this requirement and if this figure is up to date. Medway Council has requested further information from Gravesham Borough Council to demonstrate the unmet housing need.

- 2.40 No request or evidence has been currently presented from Tonbridge and Malling Borough Council to request housing needs are met outside their Borough boundaries. On this basis, it is not possible for Medway to address any unmet need.

Local Plan Time Period

- 2.41 The Plan period currently set within the Interim Sustainability Appraisal sets out that the Plan covers the period 2025 to 2041. This is a period of 16 years.
- 2.42 NPPF para 22 requires that during the plan making stage, strategic policies should look ahead to over a minimum 15-year period **from adoption**. As such, this would require the Plan to be adopted within the next 16 months. We question if a Plan will be in place by 2025.
- 2.43 The Local Plan acknowledges there are some fundamental strategic matters to resolve. This includes the highway issue of the M2 Junction, the impact of the Lower Thames Crossing as well as how the local infrastructure is to be delivered (in light of the HiF funding being withdrawn). These are all matters that need to be grappled with in combination with the allocation of development that will meet the housing and employment needs.
- 2.44 Given the recent central government political change, coupled with the changes to the Planning System suggested by the new Government in respect of Plan making, there may be fundamental changes in Government Policy that will affect the Plan making process. Whilst we are sympathetic towards the Council and the constant changes in Government messages are difficult to address for Local Plans, the fact is that these issues will inevitably have a knock on effect on the ability to bring forward a Local Plan to adoption in 2025 and the LPA should factor this into its consideration of the time period of the Plan and work in a buffer scenario in the event of adoption post 2025.
- 2.45 MC prepared an updated Local Development Scheme (LDS, February 2024) as part of the Regulation 18 consultation which sets out the timetable for the preparation of the new Local Plan. The timetable confirms that the Plan is anticipated to be adopted by or before the end of Autumn 2026. As such, at the point of adoption there would be less than 15 years until the end date of the Plan period.
- 2.46 Notwithstanding the timescales prescribed within the LDS are optimistic, the Council's LDS already offers a timetable whereby the adoption date will not comply with NPPF Para 22.

- 2.47 On this basis, the Council should extend its plan period to accommodate the requirements of NPPF Para 22 and ensure that at point of adoption the plan period extends to a minimum of 15 years.
- 2.48 This issue has recently been tested during the Examination of Maidstone BC and Tunbridge Wells BC Local Plans respectively. In both of these instances, the Plan period was extended to reflect the minimum requirement for 15 years from date of adoption.
- 2.49 On this basis, we suggest that the Plan period is amended to reflect the LDS timeline as a minimum. However, we consider that given the optimistic timescales set within the LDS, the Plan period is needed to be extended further given the likelihood of delays of the Plan through to Adoption. We suggest that the Plan period is extended to 2042 and therefore in addition to the previous identified need for housing of 3,099 dwelling a further 1,658 dwellings need to be identified, totalling 4,757 dwellings.

Summary

- 2.50 We support MC in the allocation of sites for housing development as part of a 'Blended Strategy' approach, blending regeneration and greenfield development, with a brownfield first focus complemented with a range of sites in suburban and rural areas.
- 2.51 The Plan period needs to be reviewed and extended to ensure that from adoption the Plan period exceeds 15 years.
- 2.52 Our assessment sets out that we consider that based on the sites allocated, Medway will not meet their Standard Method housing requirement, and therefore additional sites need to be allocated to meet this need to address the current 3,099 shortfall. Braeburn Village alongside further residential allocations can help to assist MC in meeting their need.
- 2.53 The recent Government announcement identified a requirement for all Local Authorities to meet their Standard Method within their Local Plan, unless there are hard constraints, such as flood risk, which mean that meeting their Standard Method would not be possible.
- 2.54 Accordingly, additional allocations need to be made. Rainham Parkside Village is such a suitable site.

3.0 THE SUITABILITY OF THE SITE

- 3.1 Esquire Developments has a number of future land interests across Medway including Rainham Parkside Village, (previously known as Pump and Bloor Farm) which is not presently identified for allocation (Appendix A).

The Site

- 3.2 The Site is located to the northeast of Rainham Town Centre, between Lower Rainham and Twydall, and extends approximately 48ha.
- 3.3 The Site comprises two parcels in agricultural use and consists of Grade 2 (with some areas being Grade 1) agricultural land that is currently in use as commercial fruit orchards. The parcels are separated by Pump Lane, which runs from north to south through the centre of the Site.
- 3.4 Parcel 1: also known as Pump Farm is approximately 23ha, located to the west of the Site. The built for associated with the function of the farm, including storage, is located on this parcel. The parcel is an irregular shape extending the length of the railway track from Pump Lane to the existing built residential development at Lower Twydall Lane. The northern boundary of the site zigzags in line with the hedgerow formation to the Lower Rainham Road. A small residential development, comprising 23 dwellings is located to the west of Pump Lane, half way along the eastern boundary of Pump Farm.
- 3.5 Parcel 2: also known as Bloor Farm, is approximately 25ha, located to the east of the Site. The parcel comprises solely commercial orchards and there is no built form on the parcel. A Bridleway (ID: GB6A) crosses the parcel horizontally, connecting Pump Lane with Lower Bloor Lane. The Bridleway is lined with thin woodland that bisects the centre of the parcel. The parcel is rectangular in shape. The parcel extends from Pump Lane, adjacent to the railway line to the Allotments and Lower Bloor Lane, and to the existing residential development at Lower Rainham Road.
- 3.6 When taking the Site as a whole, the Site is bounded to the south and southwest by the railway line and existing residential development of Twydall and Rainham. To the southwest of the Site is Bloor's Lane Community Woodland, open agricultural fields and residential development along Berengrave Lane and the recently built residential development by Linden Homes. To the north-east of the Site is the B2004 Lower Rainham Road, and beyond this Rainham Dock,

Rainham Riverside County park and Rainham Pumpkin Moon. To the northwest of the Site is open agricultural fields with sporadic residential development along Lower Rainham Road and Lower Twydall Lane.

- 3.7 The Environment Agency (EA) online flood-mapping tool shows that the Site is located entirely within Flood Zone 1 – the lowest probability of fluvial/tidal flooding. Surface water flooding can occur along two narrow strips crossing the Site, predominantly along Pump Lane, when excess rainwater does not infiltrate into the ground at varying degrees of likelihood.
- 3.8 There are a number of Listed Buildings located within close proximity to the Site including the Grade II Pump Farmhouse located within the centre of the Site. In addition, there are a number of Grade II listed buildings located along Lower Twydall Lane, and a number of Grade II listed buildings located along the Lower Rainham Road, as well as a Grade II* listed, Bloors Place. The Lower Rainham Conservation Area is linear in form, extending along a section of the Lower Rainham Road, located from the bottom of Pump Lane and extends to include all of the listed buildings, and ends just before Lower Bloors Lane.
- 3.9 The Site is located within 400m of the Medway Estuary & Marshes SPA and within the impact zone of the Site of Special Scientific Interest (SSSI).
- 3.10 The Site is located outside the settlement boundary. The Site is located within the Gillingham Riverside Area of Local Landscape Importance (ALLI), designated by Medway Council under Local Plan Policy BNE34. The Site is identified within the Fruit Belt Landscape Character Area within the Medway Landscape Character Assessment (prepared by LUC, June 2024).
- 3.11 The Site benefits from existing frequent bus services which operation along the Lower Rainham Road (Bus numbers 131 and 200A) and Beechings Way (Bus numbers 101, 116, 130, 182 and 200C). The bus services serve the area surrounding the Site and provide good connectivity to Gillingham, Chatham, Hempstead Valley, and Maidstone.
- 3.12 Rainham railway station is located c.2miles from the Site and provides frequent services to London St Pancras, London Victoria, London Blackfriars, Dover, Ramsgate, and Faversham.
- 3.13 Rainham is identified as a 'District Centre', along with Strood, Rochester, Gillingham and Hempstead Valley. Rainham provides essential services, and community uses to support sustainable living. The services and facilities in Rainham support the surrounding villages as well as the residential areas within Rainham.

- 3.14 There are a number of primary schools within close proximity to the Site including; Twydall Primary School, and St Thomas of Canterbury Catholic Primary School. The Rainham Mark Grammar School and The Maritime Academy are located to the south of the Site and provide secondary education. There are several secondary schools located beyond the immediate vicinity of the Site.
- 3.15 The closest GP surgery to the Site is the Waltham Road Medical Centre, located within Twydall alongside Hilton Dentistry and Paydens Pharmacy. There are numerous alternative GP Surgeries, Dentists, Pharmacies and Opticians within Rainham Town Centre.

Previous Appeal

- 3.16 A previous application (ref: MC/19/1566) was made by Goatham and Sons in June 2019 for:
- ‘Outline planning application with some matters reserved (appearance, landscaping, layout and scale) for redevelopment of Land off Pump Lane to include residential development comprising of approximately 1,250 residential units, a local centre, a village green, a two-form entry primary school, a 60 bed extra care facility, an 80 bed care homes and associated access (vehicular, pedestrian, cycle)’***
- 3.17 The application was refused by Medway Council on 12 June 2020. The reasons for refusal included:
- Insufficient evidence provided in relation to mitigation measures to ensure no adverse impact on Medway Estuary & Marshes SSSI, SPA and Ramsar Site.
 - Development would have a harmful impact on the local historic landscape.
 - Significant long-term adverse landscape and visual impacts to the Gillingham Riverside Area of Local Landscape Importance (ALLI).
 - Inability to satisfy Highways England that the development will not materially affect the safety, reliability, and/or operation of the Strategic Road Network.
 - Cumulative impact from the increased additional traffic cannot be accommodated on the highway in terms of overall network capacity.
 - Cumulative impact from increased additional traffic is unlikely to be able to create a safe highway environment.
 - No assessment, nor technical details have been provided regarding the two new access points along Pump Lane to serve the proposed development. Therefore, it has not been possible to appropriately assess the adequacy of these access points.

- The development would result in the irreversible loss of ‘best and most versatile’ (BMV) agricultural land.
- Absence of a completed S106 legal agreement, the proposal fails to secure infrastructure necessary to meet the needs of the development.

3.18 The applicant subsequently appealed the refusal of planning permission (ref: APP/A2280/W/20/3259868). Prior to the Appeal, point 1 and 9 above were subsequently resolved. As such, the main considerations of the Appeal to be addressed were:

- Character and appearance of the surrounding area, including the Gillingham Riverside Area of Local Importance (ALLI)
- Significance of heritage assets
- The availability of best and most versatile agricultural land
- The capacity and safety of the highway network

Landscape Impact

3.19 It was agreed between the parties that the development would give rise to adverse landscape and visual effects. It was not agreed the extent of this impact. The Inspector recognised that the effect would reduce over time to some extent. However, the Inspector concluded that the degree of harm would be significant. Although the Council has previously permitted development on parts of the ALLI, these sites are not of the same scale or are located within parts of the ALLI that has a different character and appearance from the part the Appeal Site is located.

Significance of Heritage Assets

3.20 The Inspector found that there would be no harm to the heritage significance of York Farmhouse, or the listed outbuildings within the Bloors Place complex. They further considered that the harm to Pump Farmhouse, Bloors Place, the listed walls and Lower Twydall Conservation Area would be at the lower end of less than substantial, with the harm to Chapel House and Lower Rainham Conservation Area in the middle of the spectrum. The Inspector found very limited/minor harm to the non-designated assets that is the Oasts. Overall, the Inspector considered that the development would not preserve or enhance the setting of various listed buildings with consequent harm to the special interest and heritage significance. The NPPF requires such harm to be weighed against the public benefits of the scheme, and as such, is considered below within the planning balance.

Agricultural Land

- 3.21 The loss of more than 50 hectares of BMV land, which would be the consequence of the proposed development, is a significant matter, particularly given that such land is a finite resource. However, the NPPF does not advocate against the loss of such land but indicated that its economic benefits and other benefits be recognised. Although the evidence before the Inspector indicated that the Site was not capable of returning a reasonable profit, the Inspector found that there is good prospect that the land could be farmed in such a way that realises a reasonable profit. As such, this matter will need to be weighed in the overall planning balance.

Highways

- 3.22 The Inspector found no harm in terms of highways safety. The Inspector found that the applicant's method for assessing highways modelling was more holistic, whilst the applicant's method identified a number of shortcomings and anomalies. The Inspector found that, even when taking account of the mitigation measures, that the Appeal scheme would have a severe residual cumulative impact on the local highway network. At the time of the Appeal, the Housing Infrastructure Fund awarding £170m was still available to enable the delivery of critical road infrastructure. This funding has since been withdrawn.

Benefits

- 3.23 The Inspector assessed the benefits of the scheme and assigned an appropriate weighting, which included:
- Provision of housing in light of lack of 5YHLS (substantial weight)
 - Provision of affordable housing (substantial weight)
 - Provision of employment opportunities (substantial weight)
 - 20% BNG (substantial weight)
 - Vehicular connection improvements (limited weight)
 - Public Transport Improvements (moderate weight)
 - Provision of a Primary School (limited weight)

Planning balance

- 3.24 The Inspector considered the scheme holistically within the planning balance, assessing the benefits against the harms. The Inspector concluded that the benefits of the proposal outweigh

the potential heritage harm. However, the loss of BMV, substantial landscape impact, and the impact on the local highway network was not outweighed by the benefits of the scheme. On this basis, the appeal was dismissed.

Spatial Strategy

- 3.25 As part of the previous Regulation 18 draft Local Plan consultation in October 2023, the emerging Plan set out the potential spatial strategies based on the Call for Sites submitted. The spatial strategies included every site submitted as part of the Call for Sites, and Medway did not provide an assessment of the suitability for development on each site.
- 3.26 This Regulation 18 Local Plan consultation July 2024 sets out three spatial growth options that have been assessed in the Sustainability Appraisal. SGO1 (Urban Focus) maximises redevelopment of brownfield sites in urban centres and waterfront sites, benefiting from good transport links and accessible locations. This option also included the proposed redevelopment of existing employment sites. There are potential viability issues on brownfield sites, and redevelopment of these sites would limit the range of housing types delivered to meet the needs of Medway's community, such as family homes. As such, we question if all of these sites will be able to deliver within the Plan period, given the potential viability and contamination issues associated with brownfield sites.
- 3.27 SGO2 (Dispersed Growth) considered more limited land being provided through regeneration and excludes sites such as Chatham Docks and some town centre and waterfront opportunities that are not actively being promoted by landowners. This option involves a much higher release of land on greenfield and Green Belt sites. This option 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.
- 3.28 The Site was included within SGO2 (Dispersed Growth). The Dispersed Growth option will allow for a range of housing types to be delivered across the Plan period which directly relate to the needs of Medway's communities. If development is predominantly located within urban centres, this generally results in flatted types of development only. The Dispersed Growth option allows for a wider range of housing types to come forward.
- 3.29 Furthermore, para 3.1.6 requires larger developments to provide significant uplifts in services, such as new schools, and health centres, and mitigate infrastructure constraints, including transport.

- 3.30 Para 3.1.7 state that Medway are planning to meet the full scale of development needs in Medway over the Plan period, however there are complex issues to address, in securing a deliverable strategy for sustainable development. That being said, as set out within the previous section, Medway are currently unable to demonstrate that they are meeting their needs, and without the loss of significant existing employment sites. Therefore, additional land will need to be allocated in order to meet their needs.
- 3.31 The 'Blended Strategy' provides a combination of the two previous strategies. As present, the Site is discounted from the Blended Strategy. The Blended Strategy is the Preferred Strategy, as set out within the Sustainability Appraisal, as this provides the best balance of sustainability considerations by integrating urban regeneration with suburban and rural development, promoting sustainable travel, and addressing the needs of diverse communities. We support the principle of the Blended Strategy.
- 3.32 Although this strategy is supported, we consider that additional land is required to be allocated.

Site Proposals – An SME Consortium Opportunity

- 3.33 The concept for the scheme is to come forward as an SME Consortium Opportunity and not only encourage and support SMEs into Medway, but will deliver high quality and at pace. Led by Esquire Developments, the scheme is designed to come forward in parcels with associated SME Partners (to be identified) comprising a truly landscape-led and genuine SME site ensuring it appropriately respects the Site and its surrounding context, whilst making an efficient use of the Site.
- 3.34 The proposals for the Site are set out in **Appendix D** which contains a Development Framework Document setting out greater detail of the proposals. In summary, the scheme includes:
- Around 800 high-quality bespoke homes including 30% Affordable;
 - Local centre to provide convenience retail;
 - Two from entry primary school (including AGP)
 - Children's Nursery (providing 120 places)
 - 50 – 60 bed Care Home
 - Healthcare Hub

- Community Hub, with provision for a Mobile Library;
- Improved Public Transport connectivity; and
- Significant Open Space (c. 1/3 of the Site)
- Improved connectivity along rural lanes to access Riverside Country Park.

i. *SME Consortium*

- 3.35 The proposed development is to be brought forward by a consortium of local Small to Medium Enterprise (SME) housebuilders within Kent. The development model has taken inspiration from the Duchy model of development at Poundbury, Dorchester and Nansledan, Newquay and other legacy landowner led schemes.
- 3.36 The importance being placed by Central Government on the role of SMEs in the housebuilding industry has grown significantly in previous years. This was recognised by Central Government (both in the House of Commons and House of Lords), and the wider Industry (HBF, NLP) in how important their role is to helping deliver the 300,000 homes per annum target. Lichfield's 'Start to Finish' (3rd Edition, March 2024) assessed a variety of sites of different scales and in different Local Authorities. The report identified that smaller sites (i.e. less than 9 dwellings), on average, can be expected to deliver anything in a five-year period from validation of a planning application, with delivery of the first dwelling on average taking 3.8 years. By comparison, sites of 1,000+ dwellings on average take 5 years to obtain detailed planning permission and a further 1.3-1.6 years to deliver the first dwelling.
- 3.37 Central Government recognises the problems of bringing SMEs into the market and has sought to 'level the playing field' in the context of support small and medium sized sites at the plan making stage. NPPF para 70 recognises the importance of Local Plans including small and medium sized sites to be accommodated within their housing requirements. As stated within the Lichfield's report, smaller sites on average deliver significantly quicker than larger strategic sites. In light of Medway's housing land supply and current rate of delivery against the Standard Method, it is important the Medway are able to deliver a significant number of homes quickly.
- 3.38 The NPPF gives weight to the fast delivery of high-quality housing can be best achieved by ensuring an adequate supply of small and medium sized sites, which can help to delivery homes in the short-medium term. SME Housebuilders are more flexible than a volume housebuilder and therefore can deliver homes at a scale and quality that reflect the characteristics of the location. Furthermore, the NPPF Para 70(e) supports the sub-division of larger strategic sites to help speed up the delivery of homes. This is also repeated within the Reg 18 Policy T11

(Small sites and SME housebuilders). Despite the national, and now local support for small sites, particularly driven by SMEs, set out within planning policy, SMEs continue to struggle to compete in the Plan-making process.

- 3.39 In addition to faster delivery, SME housebuilders also provide other benefits including: a higher quality of design, which is bespoke and responds to the local character, providing choice to the market and complement volume housebuilders; promote high levels of sustainability and climate change mitigation such as carbon efficiencies; reduced time limits for implementation; and a flexible approach to the delivery of affordable housing.
- 3.40 On this basis, the delivery of a strategy community infrastructure led residential development at Pump and Bloor Farm, led by a consortium of SMEs that are keen to deliver high quality housing at a faster rate than volume housebuilders, should be supported. This is especially true, where Medway are currently unable to demonstrate sufficient housing to meet their requirement.

ii. Design

- 3.41 The Development Framework Document (DFD) should be read in conjunction with these Representations. The DFD has been prepared to provide an overview of a potential mixed-use development at Rainham Parkside Village. The DFD assesses the suitability of the Site and demonstrates why it is an appropriate site for residential development in the emerging Medway Local Plan.
- 3.42 The DFD has received technical input from high-level assessments of Community Infrastructure, Highways, and Landscape. In addition, the potential impact of the development to the heritage assets and Lower Rainham Conservation Area, and the potential flooding impact has also been considered as part of the design evolution of the Site.
- 3.43 The Vision for the Site has been driven by five masterplanning concepts. This includes; 1. Delivery of non-residential uses; 2. Safe and direct routes to the wider leisure corridor; 3. Green corridors following historical lanes, field lines and tree clusters; 4. Green buffer towards the railway line to provide a leisure route; and 5. Enhanced internal and external pedestrian routes to the leisure corridor and open spaces.
- 3.44 As such, the initial masterplan considered the existing routes, gateways and hedgerows on Site. The following principles were defined:

- Retain the existing hedgerows and cluster of trees;
- Design proposals to incorporate the existing field lines where possible;
- Consider the existing pedestrian and vehicular gateways into the Site;
- Enhance the existing east/west pedestrian route within the hedgerows;
- Connect to the existing woodland and allotments; and
- Connect to the wider leisure corridor and the Coast Path National Trail.

3.45 The green network and movement around the Site was considered in the first instance. Therefore, it is important that the future proposals of the Site consider: incorporating the existing hedgerows and cluster of trees to include active travel route and biodiversity corridors; existing field lines to structure the wider network of routes and open spaces; a northern gateway into the Site along the Lower Rainham Road, to lead to the new local centre; to reinforce the existing east/west pedestrian route within the hedgerows; and provide a central woodland area.

3.46 To supplement the overall masterplanning principles, the results of the Community Facilities Assessment, assessed in greater detail below, identify the non-residential uses that are demanded from the existing community in Rainham and Twydall. The Assessment provided a clear direction of alternative uses that would greatly support the existing and future residents of the local area.

3.47 The DFD provides an illustration of how the Site could come forward, with proposed densities to reflect the local character and respond to the local historic assets that are located within close proximity to the Site.

iii. Community Infrastructure

3.48 A Local Services Capacity Assessment has been prepared by Marrons (September 2024) to understand what community facilities exist in the area currently, and where possible the capacity of such facilities, identifying any surplus or deficit capacity. The Assessment also calculates the demand for such facilities arising from the proposed development to determine whether new provision is required to support the development or whether demand can be accommodated within the existing community facilities. The Local Services Capacity Assessment is included within **Appendix E**.

3.49 The community facilities considered by the Assessment are: Day Nurseries; GP Surgeries; Dentists; Libraries; Community Centres; Older Persons Accommodation; Open Space; and

Retail. A 2km buffer from the Site boundary was drawn to represent a reasonable radius from the Site where the development will have an impact on local community facilities.

- 3.50 The summary of the likely effects on each community facilities and any mitigation measures required as set out below in Table 3.1.

Table 3.1: Summary of Local Services Capacity Assessment

Facility	Justification	Mitigation
Early Years Education	Need for 46 spaces in the area	New provision required
GP Provision	Need for approx. 1,729 patient spaces. Although some GP practices are operating with surplus capacity	New provision required either through on-site or off-site provision. CCG to advise further.
Dentist Provision	No adverse effects	n/a
Library Provision	No adverse effects	Additional provision included within a community centre would benefit the future development.
Community Halls	Community halls currently serving existing residents	New provision recommended to serve future development.
Older Persons Accommodation	Significant need for older persons accommodation.	New provision is required given the severity of lack of beds.
Open Space	There is a need for cricket and football pitches, both outdoor and 3G AGP.	A small-sides AGP to be provided. However, should be balanced with MC's efforts to regenerate existing open space in the area.
Retail	A need for small-scale local retail provision.	Quantitative justification for convenience of approximately 180sqm, essentially 2-4 small shop units.

Source: Local Service Capacity Assessment, Marrons (September 2024)

- 3.51 The summary of the Assessment has been considered and reflected within the emerging proposals set out within the DFD.

iv. *Highways*

- 3.52 As set out within the previous appeal section, highways matters related to a number of the reasons for refusal of the previous application. During the appeal, the previous applicants

sought to resolve as many of the issues as possible, to narrow down the scope for the Inspector to assess during the appeal.

- 3.53 Despite the Highways objections, there were a number of non-contentious items concluded prior to the appeal. The Framework Travel Plan submitted was agreed in principle. It was further agreed between the applicant and the Council that the site is appropriate for residential development in the context of accessibility. Furthermore, it was common ground with the Council and the local Highway Authority that all site access arrangements were acceptable. It is also noted that there was no objection from MC in air quality terms, and the Inspector's view was that there would be no adverse air quality implications arising from the appeal scheme, subject to conditions.
- 3.54 During the appeal, a number of items of issue were found to be resolved and agreed with the Council. As part of the Statement of Common Ground, Reasons for Refusal 6 & 7 were no longer pursued by Medway Council. In relation to this, the Inspector agreed that the access arrangements are suitable and would operate within capacity. Furthermore, subject to the applicant providing an executed S106 agreement which secured the mitigation Highways England required to ensure that there will be no material adverse impact on the strategic highway network, the Council no longer pursued Reason for Refusal 4.
- 3.55 Therefore, the item that remained in contention to the Inquiry where there was no agreement as to what might comprise the highway / highway network for the application of Policy T1 or the Framework Policies.
- 3.56 In support of these representations, a Local Plan Transport Representations has also been prepared by Pell Frischman (September 2024) which reviews the previous application and assesses the emerging proposals. A number of the principles agreed as part of the previous application have been included as part of the new scheme. In addition, engagement will be sought with Aviva (Local Bus Company) and Medway Council Highways Department to discuss the details and requirements for the proposal. The Highways Technical Note is included within **Appendix F**.
- 3.57 In any event, the proposals that form the basis of these representations, demonstrates a significant reduction in the number of units, therefore reducing the number of cars and the overall impact on the highway network.

v. *Landscape*

- 3.58 A Landscape Character & Visual Amenity Study has been prepared by Lloyd Bore (August 2024) to provide an initial assessment of the Site and the surroundings in order to identify the relevant landscape and visual amenity issues that would need to be considered in the development of any future detailed proposals and to assess the overall capacity of the landscape to accommodate development. The purpose of the report is to act as an evidence base for the recommendation for this Site to be allocated for residential development in the emerging Medway Local Plan. The LCVA is included in **Appendix G**.
- 3.59 The Study concludes that the proposed development would result in an unavoidable impact and result in a clear change in the predominant land use and land characteristic of the site. The proposed development would result in change in the character of the site, however it is concluded that depending upon detailed design, the development would be capable of delivering a high quality and aesthetically pleasing development of an appropriate character and vernacular for its setting. Therefore, would not result in a lowering of the condition of quality of the SLA or ALLI in the Long Term.
- 3.60 Proposed development at the Site would alter the character of an area within the Fruit Belt LCA as identified within the Landscape Assessment of Kent 2004 and would be removing a key characteristic (fruit orchards) from the LCA. The area of the Site is comparatively small compared to the overall size of the LCA as a whole. However, it should also be noted that this part of the Fruit LCA is somewhat fragmented and disconnected, with the Site poorly connected to the rest of the LCA with extensive built-up areas between this area and the rest of the LCA which lies predominantly east of Rainham.
- 3.61 Although the Site and its surroundings share many physical characteristics of the Fruit Belt LCA, due to this lack of meaningful connectivity it is perhaps actually more appropriate to consider this area as a separate and distinct LCA in its own right from the rest of the Fruit Belt LCA. The Site and its surroundings have a stronger relationship and being much more heavily influenced by the adjoining urban areas of Rainham than the rest of the Fruit Belt LCA.
- 3.62 Whilst development of the Site would in effect remove the Site from the Fruit Belt LCA and move it into the urban landscape of Rainham this is unlikely to result in a change in the character, condition or quality of the remaining parts of the Fruit Belt LCA.
- 3.63 On balance, the Study concluded that this Site and its surrounding landscape has a moderate capacity to accommodate development of the type and scale proposed. Whilst there would

be a permanent change to the character of the Site and of the landscape generally at the local scale. This would not be out of keeping with the sites wider contextual setting and whilst it is likely that this change would be considered to be adverse in the short term, in the long term it is concluded that the Site and development could be accommodated into the landscape without causing significant long term adverse effects.

3.64 The Study then considered the visual impact of development on the Site. The Study concluded that the proposed development would result in a Neutral impact upon Visual Amenity in the Long Term at the site scale, and no visual impact at the local scale or beyond. Therefore, it is concluded that the Site and the surrounding landscape has a high capacity to accommodate development of this type and scale proposed. As such, it is concluded that the Site and development could be accommodated into the landscape without causing significant long term adverse effects.

3.65 On this basis, there is a clear conflict in the ability to meet the housing requirement for Medway, whilst also protect the landscape and visual setting of the Site. Given that the Site is not located within Green Belt or a National Landscape, whilst other allocated Sites are, there is a need to consider whether the benefits of the delivery of residential development on this Site is less harmful than the delivery of residential development on a Site located within a nationally designated landscape.

vi. *Flood Risk*

3.66 The entirety of the Site is located within 'Flood Zone 1' as designated by the Environment Agency. It is therefore an acceptable location for development.

3.67 There are some small areas of the Site shown to be a low risk from localised surface water flooding, whilst there are some areas along Pump Lane that are at medium to high risk of surface water flooding. These is not a significant constraint to development and will be taken into account in the final iteration of a layout for the Site, with residential development avoiding these areas.

vii. *Heritage*

3.68 There are a number of listed buildings within close proximity to the Site, as well as the Lower Rainham Conservation Area. There are a number of listed buildings within close proximity to the site including:

- Chapel House, Grade II
- 497, 499, and 501 Lower Rainham Road, Grade II
- The Old House, Grade II
- Bloors Place, Grade II*
- Range of Outbuildings Including Cart Lodge and Granary West of Bloors Place, Grade II
- Garden Walls to south and east of Bloors Place, Grade II
- York Farmhouse, Grade II
- Little London Farmhouse, Grade II
- Twydall Barn and Attached Wall, Grade II
- Manor House and attached Garden Wall, Grade II
- Manor Barn and attached north and west walls, Grade II
- The Black House, Grade II
- Bay Tree Village, Grade II

3.69 The emerging proposals are to be designed to sensitively respond to the character of the listed buildings and Lower Rainham Conservation Area, providing significant landscape buffering and high-quality design which positively responds to the local vernacular.

3.70 As part of the previous appeal, the Inspector found that there would be no harm to the heritage significance of York Farmhouse, or the listed outbuildings within the Bloors Place complex. They further considered that the harm to Pump Farmhouse, Bloors Place, the listed walls and Lower Twydall Conservation Area would be at the lower end of less than substantial, with the harm to Chapel House and Lower Rainham Conservation Area in the middle of the spectrum. The Inspector found very limited/minor harm to the non-designated assets that is the Oasts. Overall, the Inspector considered that the development would not preserve or enhance the setting of various listed buildings with consequent harm to the special interest and heritage significance. The NPPF requires such harm to be weighed against the public benefits of the scheme, and as such, is considered below within the planning balance.

3.71 The quantum of development proposed as part of the emerging proposals significantly reduced the amount of development on Site, and is also proposed at a lower density. Therefore, the potential harms assessed as part of the previous appeal will reduce.

3.72 In any event, the appeal decision assessed the potential harms to the listed buildings and the conservation area, and within the planning balanced determined that the benefits of the scheme outweigh the potential harms to the heritage assets.

Summary

- 3.73 The plan is considered Unsound as insufficient Evidence has been presented to justify the spatial strategy and that the housing requirement will be met alongside other policy requirements.
- 3.74 We are of the strong view that additional land is required to be allocated and consider Rainham Parkside Village represents not only a suitable site for allocation, but a unique opportunity to deliver a SME Consortium scheme.
- 3.75 As highlighted in the previous section, Medway are currently unable to demonstrate through the sites allocated within the Reg 18 Local Plan document that they are able to meet their Standard Method housing requirement. The latest announcement from Central Government indicated that all emerging Local Plans are to meet their housing requirement, unless 'hard' constraints, such as flood risk, prevent them from doing so. Therefore, given that there are no significant hard constraints impacting on Medway's ability to deliver housing, additional land needs to be allocated to meet their need.
- 3.76 We have set out above how development at Rainham Parkside Village can come forward to contribute to assisting Medway in meeting their housing requirements, whilst also providing numerous local community services and infrastructure to support not only the future population of the development but also the existing population within Rainham.
- 3.77 Over the past 10-15 years, Rainham has experienced significant residential development, with very little community infrastructure delivered on-site. S106 contributions have been sought for each development. However, in the absence of an Infrastructure Delivery Plan and an increasingly out of date Local Plan, it is not clear where the S106 monies have been spent, and if they have been spent locally to the new residential development. Therefore, Braeburn Village can provide significant community infrastructure to address the current shortfalls across Rainham, and provide a significant benefit to the local community.
- 3.78 The Site is sustainable located, available, and suitable for development. The Site is also deliverable within the Plan period, and can positively contribute towards the housing requirement for Medway.
- 3.79 The proposed development is to be delivered by a consortium of local SME housebuilders with an excellent track record of design and delivery within Medway. The development will

offer development which is bespoke to each character area and offer an opportunity to enhance and grow this location in a positive way that complement the local character and area. The development will also be providing the much-needed community infrastructure that has failed to come forward in line with the previous sporadic developments around Rainham.

- 3.80 The allocation of the Site presents an excellent opportunity and would support the focus on the 'blended strategy' which requires a number of greenfield sites to come forward within suburban and rural locations to support the brownfield regeneration.
- 3.81 Furthermore, the Site presents an opportunity to deliver at a fast rate, when compared to brownfield regeneration, and a solo volume housebuilder constructing a strategic site. Therefore, the allocation of the Site to be subdivided and delivered by a range of SME housebuilders, would allow for faster delivery, as acknowledged by the NPPF and Small Sites policy within the emerging Local Plan.

Appendix A

Rainham Parkside Village, Rainham – Site Location Plan



Client Name:			
Esquire Developments			
Project Name:			
Pump Farm & Bloor Farm			
Drawing Name:			
Site Location Plan			
Drawing Number:		Rev:	Status:
PBF-BPTW-S01-ZZ-D-A-0101		P01	S2
Project No:	RIBA Stage:	Drawn By:	Scale:
24-058	01	MD	1:2500 @ A1
PRELIMINARY - FOR INFORMATION			

Appendix B

The Role of SMEs

THE ROLE OF SMEs

- 1.1 This statement set out the importance currently being placed by Central Government on the role of Small to Medium Enterprises (SMEs) in the housebuilding Industry and demonstrates the vital role SME Housebuilders will play in complementing volume housebuilders to deliver the Council's housing requirements and in turn the national housing target.

A. The Government's Position on SME'S

i) Building More Homes – July 2016

- 1.2 The Government has made it clear that it is committed to increase housebuilding to deliver 300,000 homes per year by the mid 2020's. The target figure of 300,000 homes per year comes from a recommendation in the House of Lords Economic Affairs Committee report, 'Building More Homes', published in July 2016¹. The figure takes into account estimated population change but also to address the backlog created by the failure to build enough homes over many years. All the main political parties have accepted the 300,000 dwelling per annum figure.
- 1.3 Statistics monitoring completions across the UK (gov.uk) confirm Housebuilding has not achieved this level of growth since 1977-78 (314,090 dwellings – Live_Table 109) and in 2017-18² only 222,194 dwellings (Live_Table 122) were completed. Whilst this is an increase since 2012-13 (124,722 completed dwellings), this is still well short of the 300,000 dwelling target.

ii) Home Builders Federation – January 2017

- 1.4 In January 2017, the Home Builders Federation prepared a research paper titled 'Reversing the decline of small housebuilders: Reinvigorating entrepreneurialism and building more homes'³. This document highlighted a number of facts, inter alia:
- In 1988, small builders were responsible for 4 in 10 new build homes (40%). Today it is just 12%.
 - In 1988, 12,000 SMEs were building houses. In 2017, this figure was only 2,500 SMEs.

¹ <https://publications.parliament.uk/pa/ld201617/ldselect/ldeconaf/20/20.pdf>

² 2018-19 data is not yet complete.

³ https://www.hbf.co.uk/documents/6879/HBF_SME_Report_2017_Web.pdf

- The average permissioned housing scheme has increase in size by 17% since 2007, suggesting many allocated sites are out of reach for smaller companies.
- Small sites are consistently efficient in their delivery.
- Delay and risk during the planning stage has influenced lender attitudes to housebuilding meaning terms SMEs borrow on are restricting growth opportunities.
- In 2007-2009, 33% of small companies ceased building homes.
- Returning to 2007 home builder levels could see housing supply boosted by 25,000 dwellings per year.

1.5 The HBF report attributes the reasons for the decline in SMEs has been for two principal reasons:

1. A long-term trend following landmark planning legislation in 1990 which tipped the balance of control significantly further away from entrepreneurial home builders to LPAs; and,
2. The above long-term trend compounded by the Global Financial crisis in the late 2000s when the availability of development finance became a concern.

1.6 The report continues that *'the above effects are further compounded by the availability of suitable housing sites and the constant struggle of securing an implementable planning consent through the planning process beset by delays and bureaucracy. These delays and associated costs have tangible impacts on SMEs and their ability to grow. Whilst larger companies can mitigate risk across a number of sites, small firms encountering delays on one or two sites will be the difference between a year of growth and a year of contraction'*.

iii) White Paper – February 2017

1.7 The release of the Government's White Paper in February 2017 titled 'Fixing our Broken Housing Market'⁴ only reinforced the concerns about the lack of SMEs building Houses. The Report identified 3 main problems and described the housing market as 'broken', blaming the supply shortage, *"for too long, we haven't built enough homes"*. The three problems were identified as:

1. Not enough local authorities planning for the homes they need;
2. House building is simply too slow; and,

4

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

3. The construction industry is too reliant on a small number of big players. (our emphasis)

- 1.8 The white paper outlined the Government's plans to change ('fix') the market. It called for *'a new approach to house building that included: building homes based on need; building homes faster; diversifying the house building market; and by making it more affordable for people to buy homes.'* (our emphasis)
- 1.9 The White Paper was clear that the Government intends to open the housing market to smaller builders and those who embrace innovative and efficient methods.

iv) House of Lords Debate – January 2018

- 1.10 On 11 January 2018, the House of Lords debated 'Housebuilding in the UK'⁵ and noted the performance of the UK's major house builders. The debate acknowledged the 2017 HBF report and focussed on the HBF suggestion that part of the practice of local authorities focusing on larger sites with a very high number of units may be counterproductive. The debate acknowledged *'that while it may be efficient in strong market areas, it is inefficient in weaker market areas. While the NPPF has been lauded for increasing the number of planning consents, it is argued that the number of sites permissioned, in areas of need, remains short of where it needs to be.'*

v) Revised NPPF – July 2018

- 1.11 The manifestation of the above discussions set about the introduction of a new approach within the revised NPPF 2018⁶, which sought to encourage the use of smaller sites and the requirement that 10% of the housing requirement on sites no larger than 1ha should be identified. The 10% target and 1ha was amended from the consultation version suggestion 10% of 'allocations' and only 0.5ha sites. The increase acknowledged the greater variety of sites SMEs are attracted to.

⁵ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/LLN-2018-0001#fullreport>

⁶

<https://webarchive.nationalarchives.gov.uk/20181206183454/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

vi) Letwin Independent Review of Housing Build Out Rates – October 2018

- 1.12 In October 2018, Sir Oliver Letwin issued his final ‘Independent Review of Build Out’⁷ report and recommendations on how to close the significant gap between the number of housing completions and the amount of land allocated or permissioned on large sites in areas of high housing demand.
- 1.13 Whilst the main body of the report focussed on the perceived issue of land banking, Sir Oliver Letwin identified that the *‘build out rate’ on small sites is intrinsically likely to be quicker than on large sites; (to take the limiting case, a site with just one house will take only as long as required to build one unit).’*

vii) Homes England Strategic Plan 2018-2023 – October 2018

- 1.14 In October 2018, Homes England released its 5-yr ‘Strategic Plan 2018-2023’⁸ plan to detail how it will improve housing affordability, helping more people access better homes in areas where they are needed most. The plan outlines their ambitious new mission and the steps that they will take, in partnership with all parts of the housing industry sector, to respond to the long-term housing challenges facing the country.
- 1.15 The Strategic Plan goes to some lengths identifying the decline in SME housebuilders and the result being the house building market is increasingly made up of a small number of house builders, meaning there is insufficient diversity, competition and capacity. The report continues:

There are a number of barriers preventing smaller builders from delivering a greater number of homes including: a lack of development finance; a land market weighted in favour of larger builders; and a complex planning system.

This is why we’ll create a more resilient and competitive market by supporting smaller builders and new entrants. In addition, Homes England

⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf

⁸ <https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223>

will work with house builders to promote better design and higher quality homes.

- 1.16 Driving Market Resilience has therefore been identified as a key priority for homes England. This includes access to finance but crucially where HE own sites which are too large to be developed by smaller builders, they will look for opportunities to create smaller parcels which better suit their capacity. They will achieve this improving opportunities for smaller builders to access land, and introduce simpler tender and legal documents on smaller sites to make the bidding process easier.
- 1.17 Furthermore, the strategic report looks beyond the immediate 5-yr plan and identifies a longer term priority to explore opportunities for, inter alia, removing the planning burdens faced by smaller builders on more complex sites.

viii) House of Commons Briefing Paper – December 2018

- 1.18 On 12 December 2018, a House of Commons Briefing Paper titled *‘Tackling the Under-Supply of Housing in England’*⁹ was released. The report addressed all facets of factors influencing the delivery of new homes and addressed in detail ‘Support for SME Developers’.
- 1.19 The Briefing paper recognised the barriers to delivery and the impact that competition for land has on SMEs. The report states that *‘While there is sufficient land to build on, land is scarce in economic terms as its supply is inherently limited and fixed. This leads, it is argued, to developers having to undergo ‘fierce’ competition for land “while remaining uncertain as to what planning permission they will be able to secure.” The price of land is certainly viewed as a barrier to housebuilding. The gain in value that planning permission offers is said to encourage strategic land trading, rather than development, resulting in the most profitable beneficiaries of residential development being the landowner, not the developer. High land prices can, in turn, force down the quality and size of new homes and present difficulties for small and medium sized enterprises (SMEs) when seeking to compete for sites to develop.’* (our emphasis)
- 1.20 The Briefing Paper further acknowledged the over reliance on a small number of developers and considered that *‘This concentration of market power is felt to inhibit competition and can exacerbate the impact of market shocks when all the large firms simultaneously reduce output’.*

⁹ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7671#fullreport>

- 1.21 The briefing paper recognised that housebuilding requires considerable up-front investment, meaning that *‘in most cases, new housing developers need access to finance. For the housebuilding industry, a particular concern is access to finance for SME developers. The Aldermore Group, a bank specialising in finance to small businesses, have stated: ...smaller developers continue to struggle with access to finance, with a recent industry survey showing that more than 50,000 construction and real estate firms have begun the year in ‘significant’ financial distress...unless more is done by lenders to increase funding to smaller regional developers, the potential for the industry to reach... [the Government’s house building target]...will be less likely.’*
- 1.22 Problems accessing finance can have an impact on house builders’ ability to produce high quality housing, as well as on the overall capacity of the house building industry. As far back as the Budget 2014 a commitment was made to support SME access to finance with the government creating a £500 million Builders Finance Fund to provide loans to developers to unlock 15,000 housing units stalled due to difficulty in accessing finance. In July 2015, the then Housing Minister announced that the Fund would be extended. The Spending Review and Autumn Statement 2015 further extended the £1 billion Fund to 2020/22. In October 2016 the launch of a £3 billion Home Building Fund under which builders, including SME builders, can obtain loan finance to assist with development costs and infrastructure work was established.
- 1.23 The Autumn Budget 2017 announced a further £1.5 billion for this Fund “providing loans specifically targeted at supporting SMEs who cannot access the finance they need to build. The 2017 Budget also said: “The government will explore options with industry to create £8 billion worth of new guarantees to support housebuilding, including SMEs and purpose built rented housing.
- 1.24 The briefing continues that SME developers are less able to withstand market shocks. This is illustrated by the fact that their share of total housing starts declined after each of the last two house price crashes (as quantified in the 2017 HBF report). A factor that would reduce risk and improve confidence in the development process is house price stability.

ix) Revised NPPF - February 2019

- 1.25 In February 2019, the latest version of the NPPF¹⁰ was released. This continues the March 2018 version in respect of the desire to encourage smaller sites to come forward in the planned system. Paragraph 68 of the NPPF 2019 states:

68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
 - b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;
 - c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
 - d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

- 1.26 The NPPF makes it clear that that small and medium sized sites can make an important contribution to meeting housing requirements in an area. To this end and to encourage small and medium sites, para 68 (a) seeks that 10% of small sites no larger than 1ha should be identified.
- 1.27 WDC needs to respond to this guidance in a proactive way. As detailed above, due to the competition for SMEs to enter the market it is likely that sites being promoted by SMEs will fall into Rural Service Centres or smaller villages away from the main urban areas or areas perceived as having the greatest accessibility. In this respect, paragraphs 77 and 78 (Rural Housing) of the NPPF complement paragraph 68 insofar that they recognise that planning policies need to be responsive to local circumstances and support housing development that reflects local needs. Para 77 continues that to support opportunities for affordable housing,

¹⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

some market housing should be considered to facilitate this. Para 78 further supports that housing should be located where it will enhance or maintain the vitality of rural communities. Policies should identify opportunities for villages to grow and thrive.

- 1.28 Small and Medium sized sites can make a valuable contribution to these locations principally because the approach of SMEs is more flexible than a volume housebuilder and therefore can at a scale and quality that reflect the characteristics of village locations.

x) Speech by Minister of State for Housing, Esther McVey – September 2019

- 1.29 Most recently, in September 2019, the Minister of State for Housing, Esther McVey gave a speech¹¹ at the convention for the residential property sector. Alongside reaffirming the commitment to 300,000 homes per annum, reference was made to improving the quality of housing and posed the following point *'and what about the jobs and the careers to build all these homes, we need to think about that. We need to be opening up this house building to SME's, bringing them onboard, bringing it to communities, bringing it to the self-build and bringing in modern methods of construction.'*

xi) Statement of Minister of State for Levelling Up, Housing and Communities – July 2023

- 1.30 In July 2024, the SoS spoke to the long-term plan for housing. Within this statement, the SoS committed to a new era of regeneration, inner-city densification and housing delivery across England, with transformational plans to supply beautiful, safe decent homes in places with high-growth potential in partnership with local authorities.
- 1.31 In addition to targeted action in a few high-potential areas, the government's plan delivers a package of reforms to unleash building on underused sites in high-demand regions. As part of the package of reforms, the SoS states that development should proceed on sites that are adopted in a Local Plan with full input from the local community, unless there are strong reasons why it cannot. Local Councils should be pragmatic in agreeing changed to developments where conditions mean that the original plan may no longer be viable, rather than losing the development wholesale or seeing development mothballed.

¹¹ <https://www.gov.uk/government/speeches/resi-convention-2019>

- 1.32 Furthermore, the SoS encouraged the better use of small pockets of brownfield land by being more permission, so more homes can be built more quickly, where and how it makes sense, giving more confidence and certainty to SME builders.

xii) Revised NPPF – December 2024

- 1.33 In December 2023, the NPPF was further revised¹². This continued the previous iterations of the NPPF in respect of the vision to encourage smaller sites to come forward through the plan-making system. The updated para 70 continues to make clear that small and medium sized sites can make an important contribution to meeting housing needs in an area. Para 70 goes on to seek that 10% of small sites are no larger than 1ha should be identified. The revised NPPF adds another requirement for:

“e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”

- 1.34 It is recognised that the delivery of smaller sites can address the immediate housing crisis in the short term. It is understood that smaller sites can come forward quickly, developed by local SMEs with a vested interest in delivering the site within a short timeframe. The larger strategic sites take significant time to be promoted through the Plan-making stage, as well as through the application stage, ensuring the infrastructure requirements to support large scale developments are fully considered before development can commence.

B. Pace of Delivery of an SME

- 1.35 SME’s help diversify the market and deliver choice and quality, but they can also deliver at a quicker pace than larger sites. This means that by supporting SME’s into the housing market, LPAs can strengthen its Housing Delivery and ensure a steady supply of deliverable sites.
- 1.36 Typically, Esquire Developments aim to take no more than 6 months from receipt of detailed consent to start on site.
- 1.37 The SME business model is usually set up differently to volume housebuilders. SME’s are more flexible in matters such as design and landowner negotiations. In addition, SME’s also

¹² https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

try to limit their financial risk/exposure. As a result, there are a number of factors that affect an SME's approach to delivering a site. This includes:

1. Cash Flow

- SMEs tend not to land bank as a return on their financial exposure/risk is critical to maintaining a profitable business. In this respect Cash Flow is critical and due to the time lag involved in the return of funds from a development (i.e. once homes begin to be sold), it is essential SMEs seek to reduce the time taken from the point of receiving a planning permission to the point of the sale of a house. This means once an implementable planning consent is secured, SMEs commence as quickly as possible to start on site. Larger PLCs can better carry this risk through multiple sites and numerous pipeline of completions - whereas SME's will have fewer outlets and therefore less regular returns in this respect.

2. Infrastructure Requirements

- Infrastructure requirements on small to medium sized sites are less onerous. This means discussions/contracts with utility providers are less complicated and time taken to implement the required infrastructure is less allowing this element of the build to be quicker.

3. Land Negotiations

- Often small and medium sized sites have fewer legal complications. This includes fewer land registry titles and fewer landowners and as a result fewer negotiations/legal complications that larger sites or larger PLC companies require. This often makes the 'land deal' more straightforward and thus quicker.

4. Flexibility in Product and Process

- Due to an SME's flexible approach to design quality and that standard house types tend not to be adopted, SME's have the ability to be more flexible when it comes to product choices. This not only allows the SME to offer a variety of product or specifically address local characteristics/design requirements, but it also means the SME can respond quickly to any delays or changes to the supply. This is mainly due to the decision makers being involved in the process and being 'hands-on'. As a result, there is a less hierarchal structure and decisions can be made quickly and efficiently – again reducing time.

5. Working relationships

- SMEs tend to work with a close number of trusted consultants and suppliers who also tend to be SMEs. This not only ensures quality of service and product but allows for open communication when it comes to availability of supplies and delivery of products. This means any potential delays are anticipated and the ability to successfully work through solutions. In addition, the sale of the dwellings tends to be on a more bespoke basis meaning the dialogue and communication between SME and Buyer is also on an open and communicative basis.

6. Sales Rates

- Once construction has commenced, completion rates, which follows sales rates matches the market demand and therefore an SME can build out at the same pace as larger volume housebuilders who adopt the same approach.

1.38 Whilst there is little literature addressing the delivery of small sites, there is a significant amount relating to the delivery of large-scale sites. Nathaniel Litchfield & Partners (NLP) produced a research paper titled ‘Start to Finish – How quickly do large-scale housing sites deliver? (November 2016)’¹³. The report recognised that *‘Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period..... But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes’*.

1.39 The report continues that *‘past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result’*. NLP suggest that if authorities’ Local Plans and five-year land assessments are placing reliance on large-scale developments, including Garden Towns and Villages, to meet housing need, then *“the assumptions they use about when and how quickly such sites will deliver new homes will need to be properly justified.”*

xiii) Revised NPPF – July 2021

1.40 The NPPF was revised in July 2021¹⁴ to accommodate a number of changes. This included a change in emphasis to good design and how good design was fundamental to what the

¹³ <https://lichfields.uk/media/1728/start-to-finish.pdf>

¹⁴ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

planning and development process should achieve. Furthermore more, it confirmed development that is not well designed, should be refused and conversely, significant weight should be given to developments which reflect local design policies and/or promote high levels of sustainability or help raise the standard of design more generally in an area. SME's as well placed in this regard to meet these challenges successfully.

- 1.41 The updated NPPF also amended the numbering of paragraph 68 to paragraph 69, but made no text changes to the 2019 version.

xiv) The Bacon Review (August 2021)

- 1.42 In August 2021, the Prime Ministers Independent Review into scaling up self build and custom housebuilding was published¹⁵. Led by Richard Bacon MP. Whilst primarily dealing with recommendations to government on how to support growth in all parts of the custom and self build market, helping to boost capacity and overall housing supply in our housing market, the review touched on the plight of smaller building firms.
- 1.43 The report outlined how smaller firms now account for only 12% of new housing stock and *'have been largely squeezed out by very big companies who can afford the time and cost involved in negotiating a path through the complex thickets of the planning system'*.
- 1.44 The review continues that *the SME sector has nearly been destroyed as a direct consequence of a regulatory environment which is both exceptionally complex and fraught with risk, so that the gaining of planning consents requires both very deep pockets and the ability to bear significant risks over very long periods of time.*

xv) Meeting Housing Demand, House of Lords Select Committee (January 2022)

- 1.45 In January 2022, the House of Lords Select Committee released its report 'Meeting Housing Demand'¹⁶. A series of recommendations to Government about addressing housing demand. This included recommendations on the planning system as well as the role of SMEs (Chapter 4). The report confirmed:

¹⁵ <https://www.gov.uk/government/publications/independent-review-into-scaling-up-self-build-and-custom-housebuilding-report>

¹⁶ <https://committees.parliament.uk/work/1328/meeting-the-uks-housing-demand/publications/reports-responses/>

'In this report, we call on the Government to take action and remove the administrative and other blockers which, at present, make increasing the number of homes built much more difficult. We recognise that these challenges play out differently across the country as a whole. London and the South East face different challenges to other regions, as do those at different ends of the affordability scale.'

Small and Medium-sized Enterprises (SMEs)

The role of SMEs in the housebuilding industry has collapsed: in 1988, SME housebuilders built 39% of new homes; now they build just 10%. If housing demand is to be met, SMEs should be supported through reduced planning risk, making more small sites available, and increased access to finance. We also provide options for a fast-track planning process for SMEs to reduce delays and planning risk.

1.46 In terms of summary of conditions, in respect of SME's the report made the following:

SMEs

12. The role of SMEs in the housebuilding industry has seen a sharp decline: in 1988, SME housebuilders built 39% of new homes, by 2020 this had dropped to 10%. The Government should encourage SME housebuilders in order to diversify the market and maintain competition. (Paragraph 103)

13. Local authorities should support SME housebuilders to navigate the planning process. One focus of the Government's planning reforms should be to reduce planning risk by making decisions more predictable and reducing delays, which will benefit SMEs. The Government should work with local planning authorities to create a fast-track planning process for SMEs. (Paragraph 104)

14. Wider adoption of the 'master developer' model, where larger sites are built out by a number of different housebuilders, would help SME housebuilders bid for more secure developments. The Government should require local planning authorities and Homes England to increase the percentage of homes on larger sites each year which are built by SME housebuilders. (Paragraph 108)

15. Access to finance is one of the key barriers for SME housebuilders. The Government should work with lenders to encourage them to provide more support to SME housebuilders on commercial terms. (Paragraph 112)

- 1.47 In March 2022, the Government published its response to the report¹⁷. In response to matters relating to SME's, the Government responded in the following ways:

'We agree with the Committee that there remain some specific barriers to increasing housing supply. To alleviate these, we are continuing to drive up the supply of good quality new homes that people need and want, including by diversifying the market and supporting SMEs through the Government's Levelling Up Home Building Fund'

The Government wants to increase competition in the housebuilding market, supporting SME housebuilders to deliver the choice of housing consumers need and want in this country. We agree with the Committee's report that SMEs have a vital role in making the housing market more diverse, competitive and resilient, and we are committed to ensuring the right support is in place. SMEs have a vital role in training and retaining their workforce, including delivering apprenticeships.

As stated in the Committee's report (p. 43), Government is aware that historically the three main barriers SMEs identify as facing are planning, land and finance. We have put in place a package of measures, including financial initiatives to help SMEs grow and develop, such as the Home Building Fund and the ENABLE Build Guarantee scheme. The Home Building Fund will see up to £3 billion of funding or short-term development loans provided to SMEs, custom builders and developers using modern methods of construction. It has supported many new sector entrants, with two thirds of the SMEs who have utilised funding existing for less than three years. We have committed 91% of the initial £2.5 billion development finance allocated to the Home Building Fund, and 94% of contracted transactions are with SMEs, two-thirds of which had existed for less than three years when accessing the fund. Home Building Fund development finance is now expected to support close to 70,000 homes once fully committed.

Funding has contributed to interventions like the Housing Accelerator Fund, a lending alliance between Homes England and United Trust Bank which provides SMEs with development finance at up to 70% Loan to Gross Development Value,

¹⁷ <https://committees.parliament.uk/publications/9234/documents/159940/default/>

and the Housing Delivery Fund, set up with Barclays, which provides £1 billion of loan finance to help support small and medium sized developers, speeding up the delivery of thousands of new homes across England.

To build on the success of the Home Building Fund, we have now launched a £1.5 billion Levelling Up Home Building Fund. This will provide loans to small and medium sized builders and developers to deliver 42,000 homes, with the vast majority going outside London and the South East.

We welcome the Committee's suggestions on planning and land. The Government is considering how to best take forward proposals around changes to the planning system, including how they align with and support our wider mission to level-up the country and regenerate left-behind places. Within this, we are exploring further options to support prompt and faster build-out of sites as part of our proposed changes. These changes will support diversification by providing small builders with more speed and certainty in the planning process.

xvi) Levelling Up and Regeneration Bill: Reforms to National Planning Policy (Dec 2022) Consultation

- 1.48 In December 2022, the Government consulted on the 'Levelling-up and Regeneration Bill: reforms to national planning policy'¹⁸. This proposed a suite of amendments to the NPPF. Specifically, in relation to SME'S, the consultation made the following statement:

More small sites for small builders

10. Small sites play an important role in delivering gentle density in urban areas, creating much needed affordable housing, and supporting small and medium size (SME) builders. Paragraph 69 of the existing National Planning Policy Framework sets out that local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. The Framework also asks local planning authorities to use tools

¹⁸ <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy#chapter-4--planning-for-housing>

such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward; and to support the development of windfall sites through their policies and decisions. Local planning authorities are asked to work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

11. We have heard views that these existing policies are not effective enough in supporting the government's housing objectives, and that they should be strengthened to support development on small sites, especially those that will deliver high levels of affordable housing. The government is therefore inviting comments on whether paragraph 69 of the existing Framework could be strengthened to encourage greater use of small sites, particularly in urban areas, to speed up the delivery of housing (including affordable housing), give greater confidence and certainty to SME builders and diversify the house building market. We are seeking initial views, ahead of consultation as part of a fuller review of national planning policy next year. Alongside this, the government has developed a package of existing support available for SME builders, including the Levelling Up Home Building Fund which provides development finance and Homes England's Dynamic Purchasing System which disposes of parcels of land.

1.49 Two important questions were asked as part of the consultation:

Q.24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

Q.25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

1.50 The outcome of the Consultation is pending and further review of the planning system to support SMEs is expected.

C. Conclusion



- 1.51 The role of SMEs has been fully recognised by Central Government (both in the house of Commons and House of Lords) and the wider Industry (HBF, NLP) in how important their role is to helping deliver the 300,000 homes per annum target. Constraints to SMEs have been identified, including that the plan-led system is orientated away from encouraging SMEs into the market and access to finance.
- 1.52 The 2019 NPPF has provision within it to specifically address this issue with a clear direction to Local Planning Authorities that 10% of all its housing requirements should be on sites that are 1ha or less i.e. approx. 35 dwellings and under per site. This is aimed at SME developers who deliver at or around this scale.
- 1.53 Most recently the Governments response to the House of Lords report 2022 confirms their commitment to supporting SMEs and recognising their role in meeting housing demand. The most recent consultation to the NPPF in 2022 however acknowledged that the NPPF as drafted is not having the desired effect for SMEs and that this specific matter will be addressed in due course.

The Kent SME Developers Network

May 2024

Appendix C

Assessment of Medway's Housing Allocations

Strategic Site Ref	Address	Site use	Site Area	Available	Yield	Delivered before 2025	Planning submitted	Existing Employment	Retail
AS21	Land to the south of The Brimp, (west of Avery Way and north of Ratcliffe Hwy), Allhallows-on-Sea, Medway, Kent, ME3 9QB	Residential led (Mixed-use)	41.62	Yes	390	No	No	No	No
AS22	Land East of Stoke Road and North and South of Binney Lane, Allhallows, ME3 9PF	Residential led (Mixed-use)	32.68	Yes	300	No	No	No	No
AS24	National Grid, Isle Of Grain Storage Installation and wider Grain Business Park site, Isle of Grain, Rochester, ME3 0AB	Non-residential	158.6	Yes	0	No	Yes	Yes	No
AS26	Grain CHP Power Station, Grain, ME3 0AR	Non-residential	85.25	Yes	0	No	No	No	No
HHH12	W St. J Brice Ltd, Church Farm, Main Road, Hoo, Rochester, ME3 9LL	Residential led (Mixed-use)	131.27	Yes	1850	No	No	No	No
HHH22	Land west of Ropers Lane, Hoo St Werburgh, Medway, Kent, ME3 9LT	Residential led (Mixed-use)	72.77	Yes	1500	No	No	No	No
HHH26	Land to the East of High Halstow, Land South of Britannia Road	Residential led (Mixed-use)	39.81	Yes	760	No	Yes	No	No
HHH3	Lodge Hill, Chattenden, Rochester	Residential led	23.83	Yes	500	No	No	No	No
HHH35	Kingsnorth, east of Ropers Lane, Hoo St Werburgh, Kent, ME3 9LT	Non-residential	76	Yes	0	No	No	No	No
HHH36	Eschol Road, Hoo St Werburgh, Rochester, ME3 9NQ	Non-residential	114.11	Yes	0	No	Yes	Yes	No
HHH6	Land off Chattenden Lane, Chattenden, Rochester	Residential led (Mixed-use)	35.32	Yes	550	No	No	No	No
LW6	Land West of Sharstead Farm and East of North Dane Way	Residential led	46.8	Yes	800	No	Yes	No	No
LW8	Land off Capstone road and Shawstead Road, Chatham Kent	Residential led	87.79	Yes	2075	No	No	No	No
RSE10	Land to the east of Otterham Quay Lane and Mierscourt Road, Rainham	Residential led (Mixed-use)	41.58	Yes	850	no	No	No	No
SMI6	South Side Three Road/North Side Three Road, Chatham, Kent, ME4 4SW	Residential led (Mixed-use)	57.71	Yes	3000	No	No	Yes	No
AS10	The White Horse, The Street, Upper Stoke, Rochester (ME3 9RT)	Residential led	0.18	Yes	5	Yes	Yes	No	No
AS11	Land at the Street, Rochester, ME3 9RT	Residential led (Mixed-use)	0.17	Yes	10	No	No	No	No
AS14	Land to the north of the A228, Lower Stoke	Residential led	2.72	Yes	90	No	No	No	No
AS15	Land at Middle Stoke, Grain Road, Rochester Me3 9RS	Residential led	0.86	Yes	15	No	Yes	No	No
AS16	Mackays Court Farm, Lower Stoke, Rochester, ME3 9RJ	Residential led (Mixed-use)	0.47	Yes	25	No	No	No	No
AS17	Land to the east of the A228, Grain Road, Lower Stoke, Rochester	Residential led	7.83	Yes	180	No	No	No	No
AS18	Baytree Farm, Stoke Road, Allhallows, Rochester, ME3 9PG	Residential led	1.69	Yes	48	No	No	No	No
AS2	Fenn Farm, Fenn Street, St. Mary Hoo, Rochester, ME3 8QS	Residential led	0.34	Yes	4	No	No	No	No
AS23	The Reeds, Avery Way, Allhallows, Rochester, Kent, ME3 9QJ	Residential led (park homes)	2.84	Yes	0	Yes	Yes	No	No
AS25	Land at Grain Road Grain Isle of Grain	Residential led	1.29	Yes	25	No	Yes	No	No
AS28	Medtha Bungalow, Victoria Fort Road, Isle of Grain, ME3 0DX	Residential led	1.21	Yes	25	No	No	No	No
AS29	Burneys Farm and Nord Farm, Stoke and Allhallows, ME3 9SL	Residential led	0.23	Yes	7	No	No	No	No
AS6	Fenn Bell Zoo Overflow Carpark, Land off Fenn Street, Upper Stoke, Rochester, ME9 9SG	Residential led (Mixed-use)	2.35	Yes	40	No	No	No	No
CCB1	Unit 3, New Cut, Chatham, ME4 6AD	Residential led	0.23	Yes	35	No	No	No	No
CCB10	Chatham High Street & Best Street 2010 - carpark ME4 4RH	Residential led (Mixed-use)	0.39	No	72	No	No	No	No
CCB11	Chatham High Street & Best Street 2010	Residential led	0.15	No	30	No	No	Yes	No
CCB12	Land at 9 Clover Street, Chatham, ME4 4DT	Residential led (Mixed-use)	0.18	Yes	24	No	No	No	No
CCB13	MC/18/1383, Chatham 2019, Chatham High St & Best St 2010, Pentagon 2005	Residential led (Mixed-use)	1.85	No	212	Withdrawn	No	No	Yes
CCB15	220-240 High Street, Chatham, ME4 4AN	Residential led (Mixed-use)	0.34	Yes	90	No	No	Yes	No
CCB16	Chatham 2019, Chatham Centre & Waterfront 2008 - Crown House, 55-59 The Brook, Chatham (ME4 4LQ)	Residential led	0.21	No	26	No	No	Yes	No
CCB17	MC/18/1383, Chatham 2019, Chatham High St & Best St 2010, Pentagon 2005 - Pentagon Centre, Chatham, ME4 4AJ	Residential led (Mixed-use)	0.08	Yes	14	Withdrawn	No	No	Yes
CCB18	Chatham 2019, Chatham Centre & Waterfront 2008 - Crown House, 55-59 The Brook, Chatham (ME4 4LQ) - King Street, Chatham 105A, The Brook, Chatham, ME4 4YT	Residential led	0.06	No	193	No	No	No	No
CCB19	Abbey Auction Rooms, 1-3, Rhode Street, Chatham, ME4 4AL	Residential led (Mixed-use)	0.04	Yes	13	Maybe	Yes	No	Yes
CCB20	land and buildings on the north side of Whittaker Street, Chatham, ME4 4AL	Residential led (Mixed-use)	0.5	No	175	No	Yes	No	Yes
CCB21	263, 265, 267 and 269 High Street, Chatham (ME4 4BZ)	Residential led (Mixed-use)	0.04	Yes	14	No	Yes	No	Yes
CCB22	Pentagon Service Station, The Brook, Chatham, ME4 4LU - and other titles	Residential led	0.11	No	14	No	Yes	No	No
CCB23	20 Batchelor Street, Chatham (ME4 4BJ)	Residential led (Mixed-use)	0.02	No	5	Yes	Yes	No	No
CCB24	MC615, MC/21/0603, Chatham 2019, Chatham High St & Best St 2010 - Land to the north of High Street, Chatham, Medway, ME4 4BN	Residential led (Mixed-use)	0.02	Yes	9	Yes	Yes	No	yes

Key
Non-Residential
Suitable Allocations
Discounted Sites

CCB25	Chatham Interface Land 2018	Non-residential	2.64	Yes	0	No	No	No	No
CCB26	Chatham 2019, Chatham High St & Best St 2010 - 100 The Brook, Chatham (ME4 4LB)	Residential led (Mixed-use)	0.43	No	49	No	No	No	Yes
CCB27	Ghengis Fireworks, 100 The Brook, Chatham, ME4 4LB - 100 The Brook, Chatham (ME4 4LB)	Residential led (Mixed-use)	0.06	Yes	30	No	No	No	Yes
CCB28	Chatham High St & Best St 2010 - land on the east side of Church Street, Chatham, ME4 4BT	Residential led	0.09	No	11	No	No	No	No
CCB3	MC/20/2905 - 1 Cambridge Terrace, Chatham (ME4 4RG)	Residential led (Mixed-use)	0.03	Yes	13	Maybe	Yes	Yes	No
CCB30	MC/18/1585, MC/16/4304, Chatham 2019, Chatham High St & Best St 2010 -	Residential led (Mixed-use)	0.08	Yes	21	Maybe	Yes	No	No
CCB31	MC/20/2782, Chatham 2019, Chatham Centre & Waterfront 2008 - the south west side of Cross Street, Chatham, ME4 4BJ	Residential led	0.8	Yes	179	No	Yes	No	No
CCB33	MC/19/0752	Residential led	0.02	No	6	No	No	No	No
CCB34	324-326 High Street, Chatham (ME4 4NR)	Residential led (Mixed-use)	0.51	No	36	No	No	No	Yes
CCB35	Chatham Interface Land 2018	Non-residential	2.7	Yes	0	No	No	No	No
CCB36	MC/16/4568 - 330 High Street, Chatham (ME4 4NR)	Residential led (Mixed-use)	0.03	No	7	No	No	No	Yes
CCB37	Former GoOutdoors and Market Hall, High Street, Chatham	Residential led (Mixed-use)	1.31	Yes	400	No	No	No	Yes
CCB38	MC/22/0491 - 346a High Street, Chatham (ME4 4NP)	Residential led	0.07	Yes	8	Maybe	Yes	No	No
CCB39	MC/14/1772 - 389 High Street, Chatham (ME4 4PG)	Residential led	0.06	Yes	24	No	No	No	No
CCB4	MC/19/0573 - 3 New Road, Chatham (ME4 4QJ)	Residential led	0.22	No	50	Maybe	Yes	No	No
CCB41	MC/19/0573 - 5 Otway Terrace, Chatham, ME4 5JU	Residential led	0.07	Yes	7	Maybe	Yes	No	No
CCB44	409 High Street, Chatham (ME4 4NU)	Residential led	0.03	No	2	No	No	No	No
CCB46	MC/19/3009, MC/19/0211, MC/20/1257, MC/20/3102 - land on the north side of Chatham Hill, Chatham, ME4 4PL	Residential led	0.03	No	2	No	No	No	No
CCB49	Medway Automatic Telephone Exchange, Best Street, Chatham, (ME4 4AB)	Residential led	0.55	Yes	150	No	No	Yes	No
CCB6	Chatham 2019, Chatham High St & Best St 2010, Pentagon 2005 - 1 and 2 Fullagers Yard, High Street, Chatham, ME4 4AS	Residential led (Mixed-use)	0.39	No	50	No	No	No	No
CCB7	MC/19/2136	Residential led (Mixed-use)	0.05	Yes	9	Maybe	Yes	No	Yes
CCB8	MC630, MC/20/3237 - Pentagon Centre, Chatham, ME4 4AJ	Residential led	0.16	Yes	164	Maybe	Yes	No	Yes
CCB9	MC/18/0715, Chatham 2019, Chatham High St & Best St 2010	Residential led	0.06	Yes	32	Maybe	Yes	No	Yes
CHR11	MC/16/0365	Residential led	0.14	No	8	Maybe	Yes	No	No
CHR14	Port Medway Marina, Station Road, Cuxton, Rochester, ME2 1AB	Residential led (Mixed-use)	11.4	Yes	49	No	No	No	No
CHR16	Diggerland, Roman Way, Rochester, ME2 2NU	Non-residential	8.95		0	No	No	No	No
CHR17	Diggerland, Roman Way, Rochester, ME2 2NU	Non-residential	3.73		0	No	No	No	No
CHR18	Ed Logistics, Roman Way, Rochester, ME2 2NF	Non-residential	1.28		0	No	No	No	No
CHR20	Morgan & Co (Strood) Ltd, Knight Road, Rochester, ME2 2BA	Residential led	3.69	Yes	172	No	No	Yes	No
CHR6	MC/19/0994 - Land Adjacent To Balancing Pond St Andrews Park Halling Kent	Residential led	1	Yes	88	Maybe	Yes	No	No
FH1	MC/19/1556	Non-residential	14.91		0	No	No	No	No
FP1	Star Hill to Sun Pier 2004 - land and buildings on the South side of High Street, Rochester, ME1 1BT	Residential led	0.6	Yes	111	No	No	Yes	No
FP10	122 Ordnance Street, Chatham, HE4 6SG	Residential led	2.46	Yes	170	No	Yes	No	No
FP11	Grays Of Chatham Ltd, 1-19 High Street, Chatham, ME4 4EN	Residential led (Mixed-use)	0.59	Yes	200	No	Yes	No	Yes
FP12	land and buildings on the South side of Gundulph Road, Chatham, ME4 4ED	Residential led	0.28	Yes	70	No	No	Yes	No
FP14	MC/18/3379 - 73 High Street Chatham Medway ME4 4EE	Residential led	0.01	Yes	6	Maybe	Yes	No	Yes
FP16	MC/22/0514 - First Floor 74 High Street Chatham Medway ME4 4DS	Residential led (Mixed-use)	0.02	Yes	6	Maybe	Yes	No	Yes
FP17	MC/21/0082	Residential led	0.02	No	5	No	No	No	No
FP18	Chatham 2019, Chatham Centre & Waterfront 2008	Residential led	0.32	No	40	No	No	No	Yes
FP19	Chatham 2019, Chatham Centre & Waterfront 2008	Residential led	1.66	No	146	No	No	No	Yes
FP2	325 High Street, Rochester, ME1 1DA	Residential led	0.03	No	1	No	No	No	Yes
FP22	MC/18/1412	Residential led	0.14	No	12	No	No	No	No
FP23	Chatham 2019, Chatham Centre & Waterfront 2008	Residential led	0.32	No	63	No	No	No	Yes

FP25	land on the south eastern side of Railway Street, Chatham, ME4 4RJ- an d unregistered	Residential led (Mixed-use)	2.59	Yes	121	No	No	No	Yes
FP4	K827364, Star Hill to Sun Pier 2004	Residential led	0.03	No	1	No	No	No	No
FP6	MC/14/0193 - University For The Creative Arts Fort Pitt Rochester ME1 1DZ	Residential led	0.78	Yes	120	No	Yes	No	No
FP8	MC/18/1737 - Our Zone Pattens Lane Rochester Medway ME1 2RB	Residential led	0.54	No	20	Yes	Yes	No	No
GN11	Land on the south east side of Tangmere Close, Gillingham, ME7 2TN	Residential led	0.2	No	9	No	No	No	No
GN13	Wharfland to the north west of Owens Way, Gillingham, ME7 2RS	Residential led	2.41	Yes	98	No	No	Yes	No
GN14	#N/A	Residential led	0.79	Yes	81	No	No	No	No
GN15	Land lying to the north of Pier Road, Gillingham, ME7 1FJ	Residential led (Mixed-use)	5.87	Yes	445	No	No	No	No
GN3	Depot at Pier Approach Road, Gillingham, ME7 1RX	Residential led	1.24	Yes	176	No	No	Yes	No
GN4	MC/19/1705	Residential led	0.05	No	8	Yes	Yes	No	No
GN5	MC/19/1924- Land At The Corner Of Ingram Road And Railway Street Gillingham Kent	Residential led	0.02	No	5	Yes	Yes	No	No
GN6	Gillingham No.3 and 4, : Pier Road, Gillingham, ME7 1TT	Residential led (Mixed-use)	3.86	Yes	200	No	No	No	No
GN8	Land adjacent to 176 Grange Road, Gillingham	Residential led	0.12	Yes	17	No	Yes	No	Yes
GS10	Gillingham 2019	Residential led (Mixed-use)	0.08	No	18	No	No	No	No
GS11	MC/13/0482 - 146 Canterbury Street Gillingham ME7 5UB	Residential led	0.07	No	8	No	No	No	No
GS13	Gillingham Town Centre 2007 - Gillingham Telephone Exchange, Green Street, Gillingham, (ME7 5TH)	Residential led	0.28	No	12	No	No	No	No
GS14	MC/22/1091 - 105-107 High Street Gillingham Medway ME7 1BL	Residential led (Mixed-use)	0.03	Yes	6	Yes	Yes	No	Yes
GS19	Gillingham 2019, Gillingham Town Centre 2007 - 48 Green Street, Gillingham (ME7 1XA)	Residential led	0.14	No	57	No	Yes	No	No
GS2	2b Connaught Road, Gillingham, ME7 4QD	Residential led	1.28	Yes	45	No	No	No	No
GS20	MC/16/2405 - 208 Canterbury Street Gillingham ME7 5XG	Residential led	0.04	No	5	No	Yes	No	No
GS23	MC/21/1220 - 1A Milton Road Gillingham Medway ME7 5LP	Residential led	0.03	Yes	5	Yes	Yes	No	No
GS26	MC/22/0236 MC/16/1443 - 82 Jeffery Street Gillingham Medway ME7 1DB	Residential led	0.14	Yes	14	No	No	No	Yes
GS30	MC622, MC/21/3111 - Doctors Surgery 19 Railway Street Gillingham Medway ME7 1XQ	Residential led	0.02	Yes	5	Yes	Yes	No	No
GS32	MC/21/3147 - 50 Nelson Road Gillingham Medway ME7 4LJ	Residential led	0.07	No	3	No	Yes	No	No
GS33	MC/19/2446 - 97-111 Rainham Road Gillingham Medway ME7 5NQ	Residential led	0.25	Yes	12	No	Yes	No	No
GS35	land lying to the north of Rainham Road, Gillingham, ME7 5NQ	Residential led	0.21	Yes	12	No	No	No	No
GS37	Land to the south of Railway Street, Gillingham, Medway, ME7 1YQ	Residential led (Mixed-use)	1.9	Yes	136	No	No	No	Yes
GS4	MC620, MC/20/2541 - 5 - 7 Mill Road Gillingham Medway ME7 1HL	Residential led	0.09	Yes	24	No	Yes	No	Yes
GS5	MC/18/0455 - 1 Arden Street Gillingham Medway ME7 1HG	Residential led	0.01	Yes	7	Expired	Yes	No	Yes
GS6	MC626, MC/21/1017, MC/21/1035 - 60-64 Canterbury Street Gillingham Medway ME7 5UJ	Residential led	0.03	Yes	5	No	Yes	Yes	No
GS7	MC625, MC/21/0993 - 22-32 Canterbury Street Gillingham Medway ME7 5TX	Residential led (Mixed-use)	0.07	Yes	14	No	Yes	No	Yes
GS8	MC/20/2108 - 2-4 Canterbury Street Gillingham Medway ME7 5TS	Residential led (Mixed-use)	0.02	Yes	6	No	Yes	No	Yes
HHH11	Land at Ratcliffe Highway, Hoo, Rochester, ME3 8PX	Residential led	12.1	Yes	210	Withdrawn	No	No	No
HHH24	Whitehouse Farm, Stoke Road, Hoo St Werburgh	Residential led	3.18	Yes	100	No	No	No	No
HHH25	Whitehouse Farm, Stoke Road, Hoo St Werburgh	Residential led	3.78	Yes	100	no	Yes	No	No
HHH29	Land at Christmas Lane, High Halstow	Residential led (Mixed-use)	1.91	Yes	65	No	No	No	No
HHH32	Abbots Court, Stoke Road, Hoo, Rochester, ME3 9LS	Residential led	0.79	Yes	6	No	No	No	No
HHH33	Land at Stoke Road, Hoo	Residential led	23.51	Yes	330	No	No	No	No
HHH37	London Medway Commercial Park (Plot 8A), James Swallow Way, Rochester, ME3 9GX	Non-residential	1.05	Yes	0	No	No	No	No
HHH38	London Medway Commercial Park (Plot 2), James Swallow Way, Rochester, ME3 9GX	Non-residential	9.15	Yes	0	No	No	No	No
HHH39	London Medway Commercial Park (Plot 1c), James Swallow Way, Rochester, ME3 9GX	Non-residential	5.91	Yes	0	No	No	Yes	No
HHH4	MC/20/0009 - 42 Chattenden Lane Chattenden Rochester Medway ME3 8NL	Residential led	0.09	No	4	No	Yes	No	No
HHH41	land adjoining Rivers View, Ratcliffe Highway, Hoo, Rochester, ME3 8QB	Residential led	0.99	Yes	25	No	No	No	No
HHH5	Land at Beacon Hill Lane, Chattenden, Rochester	Residential led	1.96	Yes	65	No	No	No	No
HHH8	Land between Peninsula Way and Main Road, Hoo St Werburgh	Residential led (Mixed-use)	30.81	Yes	450	No	No	No	No
HW11	Land to the west of Hempstead Road, Hempstead, Gillingham, Medway, ME7 3TQ	Residential led	3.35	Yes	60	No	No	No	No
HW5	Hempstead Valley District centre, Hempstead Valley Drive Gillingham, ME7 3PD	Residential led (Mixed-use)	10.37	Yes	266	No	No	No	Yes
HW6	Land at Blowers Wood, Maidstone Road, Hempstead	Residential led	4	Yes	88	No	No	No	No
HW8	Grain Road, Gillingham, ME8 0NB	Residential led	0.16	No	5	No	No	No	No
L11	MC/22/0053 - 54 Beacon Road Chatham Medway ME5 7BP	Residential led	0.13	Yes	7	No	Yes	No	No

L12	Jezreels Tower Works, 111 Rainham Road, Gillingham (ME7 5NQ)	Residential led	0.41	Yes	12	No	Yes	No	No
L2	MC/19/1599 - Land At Rear Of 52 Dagmar Road Luton Chatham Medway ME4 5HB	Residential led	0.07	No	5	Withdrawn	No	No	No
L3	55A Castle Road, Chatham (ME4 5HU)	Residential led	0.11	No	7	Withdrawn	No	No	No
L7	MC/19/2949 - 272-274 Luton Road Luton Chatham Medway ME4 5BU	Residential led	0.04	Yes	6	No	No	Yes	No
L9	Haywards Of Medway, 352-356, Luton Road, Chatham, ME4 5BD	Residential led	0.31	Yes	22	No	No	No	No
LW10	Land west of of Capstone Road, Chatham, Kent	Residential led	0.31	Yes	10	No	No	No	No
LW2	MC/20/1632 - 419 Walderslade Road Walderslade Chatham Medway ME5 9LL	Residential led	0.13	Yes	18	No	Yes	Yes	No
LW3	MC600, MC/20/0221 - Hallwood House Kestrel Road Lordswood Chatham Medway	Residential led	0.27	Yes	41	No	Yes	No	No
LW4	Land off North Dane Way, Chatham, Kent - MC/19/0765	Residential led	27.41	Yes	800	No	Yes	No	No
LW5	MC/21/1403	Residential led (C2 use)	0.18	Yes	0	No	No	No	No
LW7	MC/18/0556 - Gibraltar Farm Ham Lane Hempstead Gillingham Medway ME7 3JJ	Residential led	23.13	Yes	450	No	Yes	No	No
REWW3	Freeholdland and buildings on the north side of Cecil Road and on the west side of Delce Road, Rochester, ME1 2HW	Residential led	0.34	Yes	11	No	No	No	No
RN11	MC630, MC/20/2696 - Kingdom Hall Bloors Lane Rainham Gillingham ME8 7DS	Residential led	0.5	Yes	20	No	Yes	No	No
RN18	MC558, MC/19/0298 - 76 Station Road Rainham Gillingham Medway ME8 7PJ	Residential led	0.04	Yes	8	Expired	Yes	No	Yes
RN22	MC458, MC/18/1782 - 311 Station Road Rainham Gillingham Medway ME8 7PU	Residential led	0.1	Yes	8	Expired	Yes	No	No
RN23	Land West of Station Road (Temple), Station Road, Rainham	Residential led	2.19	Yes	75	No	Yes	No	No
RN24	MC/22/2240 - 33 High Dewar Road Rainham Gillingham Medway ME8 8DN	Residential led	0.06	Yes	9	No	Yes	No	Yes
RN25	MC/21/1108 - Pampa House Station Road Rainham Gillingham Medway ME8 7UF	Residential led	0.22	Yes	5	No	Yes	No	No
RN27	MC/18/1796 - Land South Of Lower Rainham Road Rainham Gillingham Medway ME8 7UD	Residential led	9.16	Yes	200	No	Yes	No	No
RN28	Land North of Moor Street, East of Otterham Key Lane, Rainham, Kent	Residential led	3.68	Yes	66	No	Yes	No	No
RN29	Actionpoint, Chestnut Court, Otterham Quay Lane, Rainham, Gillingham, ME8 8AS	Residential led	0.38	Yes	25	No	No	No	No
RN30	Land at Seymour Road, Seymour Road, Rainham, Kent, ME8 8PY	Residential led	4.31	Yes	90	No	No	No	No
RN31	Land Fronting Seymour Road (title K420792), Seymour Road, Rainham, ME8 8PY	Residential led	6.44	Yes	80	No	No	No	No
RN32	Land at Seymour Road, Rainham, Kent	Residential led	2.06	Yes	48	Maybe	Yes	No	No
RSE9	Orchard Cottage, Meresborough Road, Rainham, Gillingham, ME8 8QJ	Residential led	0.9	Yes	40	No	No	No	No
RWB1	MC/20/2107, MC/19/0691, MC/20/0734 - Bridgeside Warwick Crescent Borstal Rochester Medway ME1 3LE	Residential led	0.27	Yes	12	No	Yes	No	No
RWB10	MC/19/2566, Corporation St Development Framework 2008	Non-residential	0.14	Yes	0	No	No	No	No
RWB11	MC614, MC/20/2815, MC/18/2467 - Dental Surgery 1 - 4 Eastgate Court Rochester Medway ME1 1EU	Residential led	0.03	Yes	5	No	No	No	Yes
RWB12	land and premises on the North East side of East Row and the North West side of Victoria Street, Rochester, ME1 1XN	Residential led	0.13	Yes	3	No	No	No	No
RWB14	Corporation St Development Framework 2008 - land and buildings on the North side of Blue Boar Lane, Rochester, ME1 1NH	Residential led	0.12	No	15	No	No	No	No
RWB15	MC/20/0932, Corporation St Development Framework 2008 - St Clements House Corporation Street Rochester Medway ME1 1NL	Residential led	0.26	Yes	44	No	Yes	No	No
RWB17	Corporation St Development Framework 2008	Residential led	0.06	No	3	No	No	No	No
RWB18	Corporation St Development Framework 2008 - Rochester Delivery Office, 165 High Street, Rochester (ME1 1AA)	Residential led	0.09	No	4	No	No	No	No
RWB19	MC/19/0038, Corporation St Development Framework 2008, Star Hill to Sun Pier 2004 - Bardell Terrace Rochester Kent ME1 1NG	Residential led (Mixed-use)	1.57	Yes	331	No	Yes	No	No
RWB2	MC/15/2332 - Medway Bridge Marina Manor Lane Borstal Rochester Medway ME1 3HS	Residential led	1.78	Yes	36	No	No	No	No
RWB20	Corporation St Development Framework 2008, Star Hill to Sun Pier 2004	Residential led	0.08	No	15	No	No	No	No
RWB21	Corporation St Development Framework 2008, Star Hill to Sun Pier 2004 - land and buildings at St Margaret's Banks, Rochester, ME1 1HY	Residential led	0.08	No	15	No	No	No	No
RWB23	Star Hill to Sun Pier 2004	Non-residential	0.14	Yes	0	No	No	No	No
RWB25	Land to the east of Gas House Road, Rochester, Medway, ME1 1QN	Residential led	0.59	Yes	106	No evidence	No	No	No

RWB3	Land to the east of Victoria Terrace, Borstal, Rochester, Medway, ME1 3JH	Residential led	0.13	Yes	4	No	No	No	No
RWB4	Land lying to the north of Valley View Road, Rochester, ME1 3NU	Residential led	0.3	Yes	9	No	No	No	No
RWB6	MC/21/2352 - Land At The Junction Of Maidstone Road And Sir Evelyn Road Rochester Kent	Residential led	0.16	Yes	7	Withdrawn	No	No	No
RWB8	Corporation St Development Framework 2008 - Chambers of Rochester Ltd, High Street, Rochester (ME1 1QB)	Residential led (Mixed-use)	0.06	Yes	2	Withdrawn	No	No	No
RWB9	Corporation St Development Framework - Chambers of Rochester Ltd, High Street, Rochester (ME1 1QB) 2008	Residential led (Mixed-use)	0.08	Yes	3	Withdrawn	No	No	No
SNF10	Strood 2019, Strood 2009 - Strood Service Station, 3 London Road, Rochester (ME2 3HX)	Residential led (Mixed-use)	0.25	No	16	No	No	No	No
SNF12	MC/20/0104 - Land North Of Clarendon Drive Strood Kent ME2 3LT	Residential led	0.3	No	6	Expired	Yes	No	No
SNF13	Strood 2019, Strood 2009 - Deacon Trading Centre, Knight Road, Rochester (ME2 2AU)	Residential led (Mixed-use)	3.32	No	373	No	No	No	No
SNF15	H R H Estates, 167c High Street, Strood, Rochester, ME2 4TH	Residential led (Mixed-use)	2.37	Yes	450	No	No	No	No
SNF17	MC/22/3002 - Land Rear Of 161-163 High Street Strood Rochester Medway ME2 4TH	Residential led	0.02	Yes	6	Maybe	Yes	No	Yes
SNF18	Strood 2019 - land on the east side of Knight Road, Strood, ME2 2AU	Residential led (Mixed-use)	2.72	No	27	No	No	No	No
SNF20	Keystone Health Centre, Gun Lane, Strood, Rochester, ME2 4UL	Residential led	0.23	Yes	15	No	No	No	No
SNF21	Strood 2019 - 76 Commercial Road, Rochester (ME2 2AD)	Residential led (Mixed-use)	0.64	No	44	No	No	No	No
SNF22	Strood 2019, Strood 2009 - land on the north and south of Commercial Road, Strood, ME2 4TG	Residential led (Mixed-use)	0.29	No	47	No	No	No	No
SNF23	MC619, MC/21/0370 - 100-110 High Street Strood Rochester Medway ME2 4TS	Residential led (Mixed-use)	0.06	Yes	8	No	Yes	No	No
SNF24	MC/22/1200 - 13 - 17 North Street Strood Rochester Medway ME2 4SL	Residential led (Mixed-use)	0.05	Yes	7	Maybe	Yes	No	No
SNF27	MC/19/2211, MC/21/0675 - 24 Gun Lane Strood Rochester Medway ME2 4UJ	Residential led	0.09	Yes	9	Maybe	Yes	No	No
SNF30	MC/15/2097Strood 2019 - 85-91 (odd), High Street, Strood, Rochester (ME2 4TL)	Residential led (Mixed-use)	0.11	Yes	9	Expired	Yes	No	No
SNF31	MC/22/0108 - 70-76 High Street Strood Rochester Medway ME2 4AR	Residential led (Mixed-use)	0.03	Yes	8	Maybe	Yes	No	No
SNF32	MC601, MC/20/2783 - 22 & 24 St Marys Road Strood Rochester Medway ME2 4DF	Residential led	0.03	Yes	6	Expired	Yes	No	No
SNF34	Strood 2019 - Strood Service Station High Street Strood Rochester ME2 4AB	Residential led (Mixed-use)	0.17	Yes	52	No	No	No	Yes
SNF35	Phase 1 Site (Civic Centre) Strood Riverside South Of Rochester Bridge Strood	Residential led (Mixed-use)	2.65	Yes	195	No	No	No	No
SNF36	Strood 2019 - North west of Strood High Street.	Residential led (Mixed-use)	0.03	No	6	No	No	No	No
SNF37	Strood 2019 - National Tyres & Autocare, Station Road, Strood, Rochester (ME2 4BA)	Residential led (Mixed-use)	0.14	No	13	No	No	No	No
SNF38	MC/17/2044 - resubmission of MC/16/3137 1-7 Canal Road Strood Rochester	Residential led	0.07	Yes	12	Expired	Yes	No	No
SNF39	Strood 2019, Strood Waterfront 2018, Strood 2009 - Kingswear Gardens, Rochester	Residential led	1.61	No	101	No	No	No	No
SNF41	Strood Riverside, Rochester, ME2 4DT	Residential led (Mixed-use)	4.97	Yes	602	No	No	No	No
SNF43	MC/20/1867 - Land North Of Commissioners Road Strood Rochester Kent ME2 4EQ	Residential led	3.75	Yes	123	No	Yes	No	No
SNF44	Sparkling Hand Car Wash, Frindsbury Hill, Rochester, ME2 4JR - Resubmission of MC/20/1046 Garden Service Station Frindsbury Hill Wainscott Rochester Medway ME2 4JR	Residential led	0.07	Yes	6	Expired	Yes	No	No
SNF5	MC/19/1708 - 18 Broom Hill Road And Land To Rear Strood Rochester ME2 3LE	Residential led	0.35	Yes	8	Expired	Yes	No	No
SNF8	land on the North East side of Priory Road, Rochester, ME2 2EG	Residential led (Mixed-use)	0.26	Yes	19	No	No	No	No
SNF9	Land to the north west side of Cuxton Road, Rochester, ME2 2DA	Residential led (Mixed-use)	0.45	Yes	60	No	No	No	Yes
SR14	MC/21/1694 - Land South Of View Road Cliffe Woods Rochester Kent	Residential led	5.15	Yes	68	Maybe	Yes	No	No
SR25	MC/21/0302 - Land South Of Berwick Way, East Of Frindsbury Hill And North And West Of Parsonage Lane (known As Manor Farm) Frindsbury Rochester Medway	Residential led (Mixed-use)	16.95	Yes	181	No	Yes	No	No
SR30	Veetee, Unit 2, Enterprise Close, Medway City Estate, Rochester, ME2 4LY	Residential led (Mixed-use)	0.56	Yes	102	No	No	Yes	No
SR31	Veetee Foods Ltd, Veetee House, Sir Thomas Longley Road, Medway City Estate, Rochester, ME2 4DU	Residential led (Mixed-use)	1.39	Yes	311	No	No	Yes	No
SR34	Riverside House, 58 Sir Thomas Longley, Rochester ME2 4FN	Residential led	0.34	Yes	30	No	No	Yes	No
SR36	Land lying to the east of Anthony's Way, Rochester, ME2 4QP	Residential led (Mixed-use)	2.25	Yes	200	No	No	No	No
SR37	Veetee Rice Ltd, Neptune Close, Medway City Estate, Rochester, ME2 4LT	Residential led (Mixed-use)	1.89	Yes	428	No	No	Yes	No
SR38	Land on east side of Neptune Way, Rochester, ME2 4NA	Residential led (Mixed-use)	1.32	Yes	100	No	No	Yes	No
SR4	Land west of Town Road, Cliffe Woods	Residential led	6.29	Yes	130	No	No	No	No
SR40	Waterside Court, Neptune Way, Medway City Estate, Rochester, ME2 4NZ	Residential led (Mixed-use)	0.87	Yes	200	No	No	Yes	No
SR47	MC/17/2272 - Fleet House Upnor Road Upnor Rochester ME2 4UP - resubmission Mc/22/2813	Residential led	0.13	Yes	7	Maybe	Yes	No	No
SR48	MC/19/2361 - Patmans Wharf Upnor Road Upnor Rochester Medway ME2 4UY	Residential led	0.25	Yes	8	Maybe	Yes	No	No
SR49	Shaftesbury House, Upnor Road, Upnor	Residential led	0.24	Yes	15	No	No	No	No

SR50	land lying to the South of Elm Avenue, Hoo, St Werburgh, ME2 4XB	Residential led	0.27	No	5	No	No	No	No
SR51	Land adjoining Cliffe Saltings, Cliffe, Rochester, ME3 7SN	Residential led (Mixed-use)	21.62	Yes	250	Maybe	Yes	No	No
SR7	Land South of Buckland Road, Cliffe Wood	Residential led	8.35	Yes	45	Maybe	No	No	No
SW1	MC/20/1192 - Garage Site Rear Of 23-29 Seagull Road Strood Rochester Medway ME2 2SQ	Residential led	0.17	Yes	12	Maybe	Yes	No	No
SW2	MC/20/2641 - Resubmission of MC/20/2641 Zara Gardens 1 Bligh Way Strood Kent MC/22/1717	Residential led	0.78	No	106	No	No	No	No
SW3	MC/19/1731 - Resubmission of MC/19/1731 Hawthorn Road Clinic Hawthorn Road Strood Rochester Medway ME2 2HU	Residential led	0.11	No	9	Yes	Yes	No	No
SW5	MC/17/4320 - Garages Adjacent To186 Laburnum Road Strood Rochester Medway ME2 2LD	Residential led	0.15	Yes	6	Maybe	Yes	No	No
SW6	MC/19/1815 - Land To The Side And Rear Of Tesco Express 178 Darnley Road Strood RochesterME2 Medway ME2 2UW	Residential led	0.14	Yes	6	Expired	Yes	No	No
SW7	MC/17/4318 - Land Adjacent 2 & 4 Laburnum Road Strood Kent ME2 2LA	Residential led	0.08	Yes	6	Expired	Yes	No	No
SW8	MC/18/1938 - 29 London Road Strood Rochester Medway ME2 3JB	Residential led	0.06	No	7	Expired	Yes	No	No
T3	MC/16/1990 - Formerly Lennox Wood Retirement Home Petham Green Twydall Gillingham ME8 6SZ	Residential led	0.43	Yes	20	Expired	Yes	No	No
W3	land on the south side of Watling Street, Chatham, ME5 7HE	Residential led	0.31	Yes	9	No	No	No	No
W4	Pro Box, 41 Barnsole Road, Gillingham, ME7 4DT	Residential led	0.03	Yes	5	Expired	Yes	No	No
W7	MC635, MC/21/2015 - Canada House Barnsole Road Gillingham Medway ME7 4JL	Residential led	0.39	Yes	21	Maybe	Yes	No	No

Appendix D

Development Framework Document (BPTW, September 2024)



Rainham Parkside Village

An SME Consortium Opportunity

Lower Rainham, Kent

Development Framework Document

September 2024

BPTW is an architecture practice focused on transforming not just physical spaces, but people's lives. Our work tells our story.
We are bold. We are innovative. We care.

Bringing together a wide range of design specialisms, for over 35 years, innovation in urban design, planning, sustainability, and construction technologies has established our reputation as experts in housing, neighbourhood placemaking, and mixed-use regeneration.

From concept to completion, we work collaboratively with our clients, communities, and design teams to create beautiful homes and places.

Rainham Parkside Village - Development Framework Document
Job no. 24-058

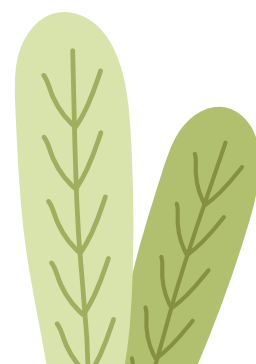
For further information contact: Scott Adams
Role: Partner, Urban Design // [REDACTED]



Rainham Parkside Village

Lower Rainham, Kent

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01. Purpose of this Document

This Development Framework Document (DFD) has been prepared on behalf of Esquire Developments Limited to provide an overview of a potential mixed use development site at Rainham Parkside Village ('the Site') located in Lower Rainham.

This Development Framework Document (DFD) has been prepared on behalf of multi award winning SME Housebuilder Esquire Developments Limited to provide an overview of a potential SME consortium residential-led mixed-use development site at Rainham Parkside Village ('the Site') located in Rainham.

The DFD sets out the vision for the site and assesses the suitability of the Site and demonstrates why it is an appropriate Site to be allocated for residential development in the emerging Medway Local Plan 2025 - 2041.

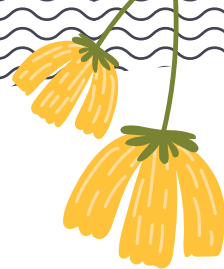
This DFD includes information about the Site including the previous planning history, the current planning context both nationally and locally, relevant technical considerations and the benefits the proposed development could deliver.

The Site is not just suitable for residential development but also to deliver a range of social, economic and environmental council objectives, including affordable housing, better infrastructure, local employment and community facilities.

This document is produced for illustrative purposes, providing an aide-memoir for interested parties.

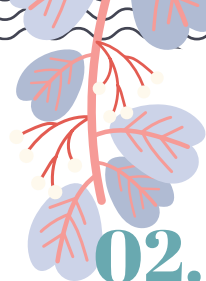
The proposals themselves are evolving and will be subject to amendment and refinement as further work is completed. This DFD may be updated accordingly.





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Hectares





02. About Esquire Developments Limited

Esquire Developments Limited is a multi-award-winning SME developer, based in Longfield, Kent and is focused on the delivery of bespoke high quality homes throughout Kent and the South East of England.

Esquire have forged a reputation for combining innovative design with skilled craftsmanship to provide lifetime family homes. With meticulous attention to detail and superior materials Esquire produce beautifully designed homes that are built to the highest standards, specification and finish.

At the very heart of Esquire's aspirations is the delivery of outstanding quality of life to new homeowners. This is reinforced by a sympathetic understanding of ever-changing modern living standards combined with timeless design and high-quality craftsmanship. Each and every development is designed to enrich its surrounding environment and complement the existing community.

As well as housebuilding, Esquire are heavily active in the local community, working closely with a number of local charities and organisations including sponsoring Longfield Tigers FC U7 and U9 teams, Dartford Valley Rugby Club, Cliffe Woods FC U7's, The Mote Cricket Club Ladies Team and have been the official community sponsor of Ebbsfleet United Football Club. Esquire are also sponsors of the annual Twilight Walk supporting Ellenor Hospice and has recently partnered with Demelza not only undertaking extensive fund raising events but building a purpose built new facility for the charity.

SME Developers

We are in the midst of a national housing crisis. The increasing complexity, risk and cost associated with the planning system has seen a sharp decline in SME Housebuilders meaning that today, the housing market is dominated by a few volume housebuilders - the eight largest builders build more than 50% of new homes and smaller builders find it difficult to operate.

Statistics have confirmed that in 1988, SME Housebuilders contributed 39% of the total supply of new homes. By 2020, this had dropped to just 10% and has approximately halved since 2007 alone.

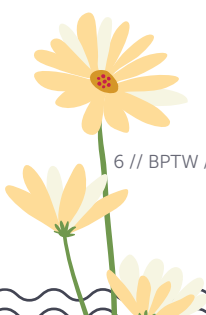
The loss of SME housebuilders has clearly affected the industry's ability to meet its housebuilding targets. The Home Builders Federation calculated that returning to the number of home builders operational in 2007 could help boost housing supply by 25,000 homes per year. Even a return to 2010 levels could help increase output by 11,000 homes per year.

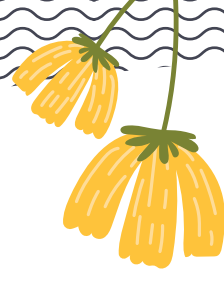


Fetaherbed Farm



Foxglove





As most SME developers live and work within their community, they also contribute to shaping local communities. The Land Promoters and Developers' Federation said:

"In recent years, housing development has become focused within a fewer number of larger builders, hence housing design has tended to become more standardised and housing layouts can take a strikingly similar form".

Whilst the decline of SME's has been recognised by Government, the ongoing changes to the Planning System has not gone far enough to support SME Housebuilders and the ability for SME's to help increase supply. This has in turn stymied growth and created a substantial barrier to SME's - particularly when it comes to Local Plan preparation.

Smaller sites and SME Housebuilders often get marginalised in this process due to the inability to promote land over long periods of time or the land available is either too small for allocation or is located in smaller towns and villages which historically see fewer allocations.

In 2023, the Home Builders Federation wrote to the then prime minister outlining the serious issues facing SME Housebuilders and that the planning system required changes:

"It is estimated that there are today 85% fewer small home builders than there was a generation ago, but the barriers we experience today threaten to obliterate the contribution to housing supply from our local businesses. A recent poll of more than 200 SME home builders found that 93% were considering scaling back their residential construction activities or changing business direction, therefore cutting investment in the home building sector"

SME Housebuilders bring many benefits. We deliver quickly and to a high quality bringing variation in design and materiality. This delivers diversity in the market and offers home purchasers choice of location and style. We also support local employment and our supply chains are also SME businesses themselves.



Woodlands



Woodlands



03. Site Introduction

The Site, known as Rainham Parkside Village, is located to the northeast of Rainham between the railway line and Lower Rainham Road. It extends to approximately 51ha.

The Site comprises 2 agricultural parcels currently in use as commercial fruit orchards. The parcels are separated by Pump Lane, which runs generally from north to south through the Site.

Rainham Parkside Village

West: also known as Pump Farm is approximately 25ha located to the west Pump Lane. It comprises commercial orchards and associated agricultural buildings.

Rainham Parkside Village

East: also known as Bloor Farm is approximately 26ha located to the east of the Pump Lane and extends up to Lower Bloors Lane.

It comprises further commercial orchards and a Bridleway ID GB6A, which crosses the parcel horizontally, connecting Pump Lane with Lower Bloors Lane.

The bridleway is lined with an area of vegetation that bisects the centre of the parcel.

The Site contains a number of farm buildings used for storage and other uses in connection with the commercial orchard. The majority of the Site is planted orchards within limited landscaping in the form of hedges surrounding the site and separating individual parts of the orchard.

The Site is bound to the north-west by further agricultural fields; to the north and north-east partly by houses and the B2004 Lower Rainham Road and beyond this the Medway River Estuary; to the south the railway line acts as a defining boundary but in this area also includes allotments, beyond which is Bloors Lane Community Woodland and to the west near the railway line, is the edge of the residential development in Rainham.



View of Pump Lane from Lower Rainham Road



Access to allotments from Lower Bloors Lane



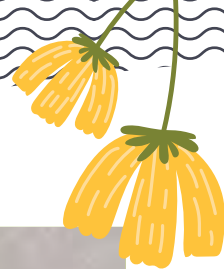
Mature hedgerows and trees



Caption to come



Access to bridleway from Lower Bloors Lane



Pump Lane



Hedgerow opposite orchards



Farmstead development along Pump Lane



Residential building along Russett Farm



Lane between orchards



Commercial orchards



04. Previous Appeal

A previous application (ref: MC/19/1566) was refused by Medway Council in June 2020, which was subsequently dismissed at appeal on 03 November 2021 (ref: APP/A2280/W/20/3259868).

Previous application

A previous application (ref: MC/19/1566) was made in June 2019 for:

"Outline planning application with some matters reserved (appearance, landscaping, layout and scale) for redevelopment of land off Pump Lane to include residential development comprising of approximately 1,250 residential units, a local centre, 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)".

The application was refused by Medway Council in June 2020, which was subsequently dismissed at appeal on 03 November 2021 (ref: APP/A2280/W/20/3259868).

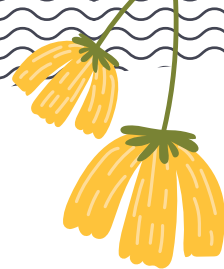
The main considerations that were subject to the Appeal were:

- Character and appearance of the surrounding area, including the Gillingham Riverside Area of Local Importance;
- Significance of heritage assets;
- The availability of best and most versatile agricultural land; and
- The capacity and safety of the local highway network.

The Inspector concluded that the benefits of the proposals outweigh the potential heritage harm. However, the loss of BMV, substantial landscape impact, and impact on the local highway network was not outweighed by the benefits of the scheme, and was therefore dismissed.



Street elevations from the refused planning application - May 2019, PRC.
Source: Planning Portal



The adjacent plan refers to the previous refused application for the site. Many aspects of the design did not positively respond to the unique, rural qualities of the site. The following aspects will be considered to develop a stronger design response to the site:

- Internal 'loop' road contrasts the linear nature of the farms and development patterns of the area
- Pump Lane's function as a north-south road is removed along its northern length
- Site density is too dense for the context
- Field patterns and hedges removed, losing local rural character
- Village green separate from Village Centre uses

The emerging approach

The emerging scheme approaches the site in a radically different way. Most notably it is of a substantially smaller scale than the Appeal scheme thus limiting the degree of impacts from before, particularly in regards to landscape and road network.

This scheme is also supported by a greater evidence base, which has identified the past levels of growth in the local area and subsequent impact in Rainham in recent years through ad hoc applications that have come forward.



"Proposed residential development masterplan" - May 2019, PRC. Source: Planning Portal

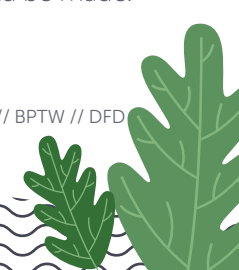
Accordingly, the scheme offers a mix of uses that rectifies some of the deficiencies within the wider infrastructure that have not come forward under any form of comprehensive or plan led development due to these ad hoc sites being too small on their own to deliver such infrastructure.

In addition, the site is designed to be delivered by a conglomerate of SME Housebuilders in order to ensure not only pace of delivery, but also variation in design and of high quality.

The SME Consortium approach fits wholly within the Council's objective of delivering high quality homes at pace, whilst also supporting SME Housebuilders – which in turn supports other associated employment provision within the local area.

Finally the layout is integrated within the site and positively responds to the rural character of the area, celebrating the former farming uses and utilises the local "lane" network.

In short, whilst the previous appeal was dismissed, this scheme is materially different in nature to that Appeal scheme meaning no direct comparisons can or should be made.



05. Planning Context

Medway Council is currently in the process of preparing a new Local Plan which will guide development up until 2041.

Medway Council is currently in the process of preparing a new Local Plan which will guide development up until 2041. The Local Development Scheme (LDS, February 2024) indicates that following the publication of the Regulation 18B in July 2024, MC anticipate adoption of the emerging Local Plan in Autumn 2026.

The Local Plan is a key document for Medway to understand the direction and scale of growth and ensure that the supporting infrastructure is also delivered alongside new homes. Unfortunately, Medway last adopted a Plan over 20 years ago in 2003 and has been unable to demonstrate a 5-yr supply of land for longer than that.

Accordingly, there has been a substantial and sustained amount of ad-hoc growth across all of Medway, including Rainham. Unfortunately because of the nature of this growth, it has not been possible to properly plan and deliver the associated infrastructure to mitigate against the impacts. This includes the provision of schools, doctors surgeries, later living, open spaces and community facilities.

Whilst this isn't a specific fault of any one site or the Council, it is a consequence of trying to address housing needs without a Local plan in place.

For Medway, the current standard method proposes a housing requirement of 1,667 dwellings per annum meaning around 26,500 of new homes are to be delivered up to 2041.

The Council has for a long time identified substantial growth on the Hoo Peninsular, which will be the main focus for future development. However, other parts of Medway are required to deliver homes including in Rainham.

This site represents an excellent opportunity to help meet not only the homes needed up to 2041, but also rectify a number of community deficiencies in the area and deliver a unique new village to Rainham.



Dispersed Growth



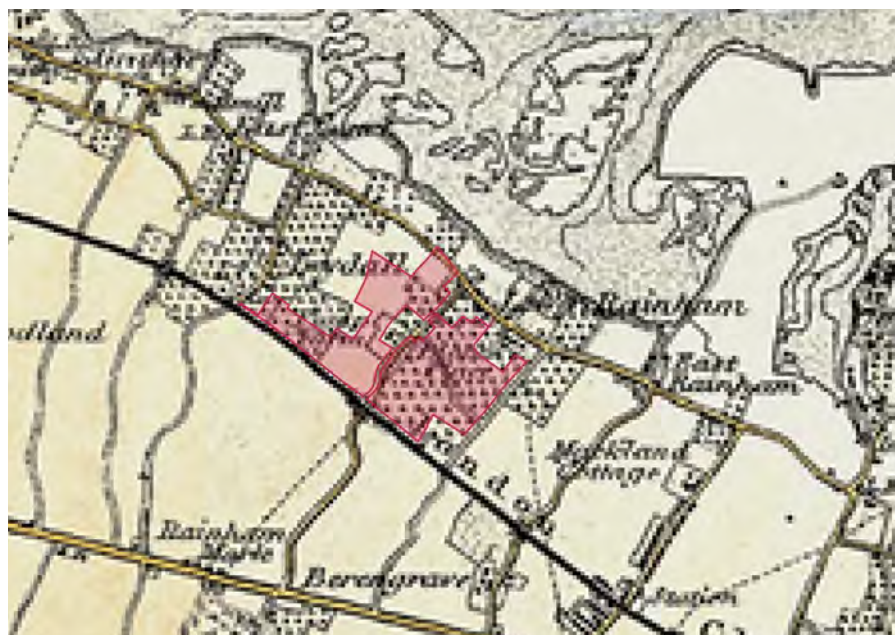
06. Settlement History

The north south lanes linking Lower Rainham Road to London Road are a key historical feature within the site context.

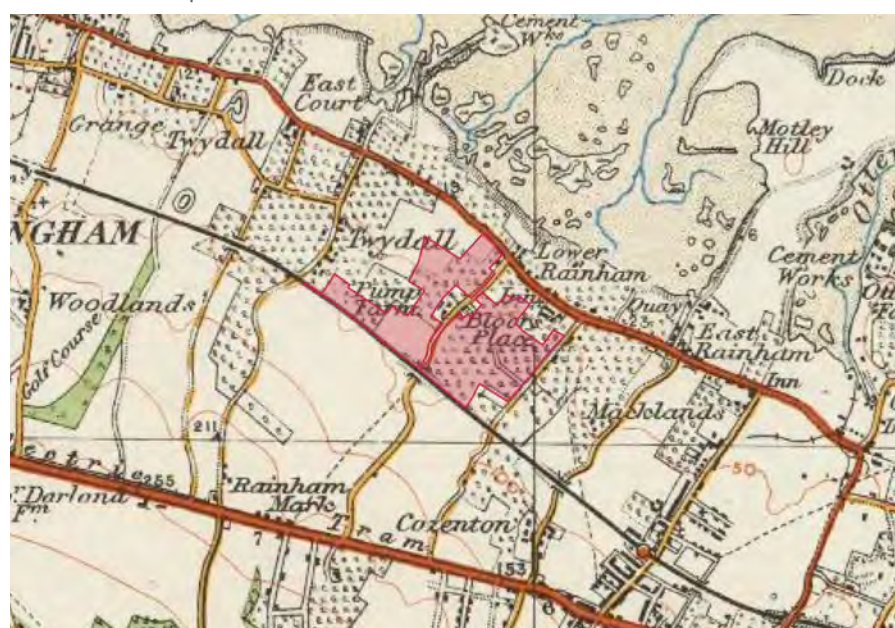
Historical evolution

The following pages include four historical maps illustrating how the site and its context developed over time:

- 1897: the area included railway line surrounded by agricultural land with limited linear development along streets.
- 1923: the area developed with greater industries including a cement works, quay and a dock appear along the waterfront to the north of Lower Rainham Road. Additional development is located to the south of London Road. Bloor's Wharf (taking the name by the old mansion house to the south) had been used for a number of industrial purposes, including a ship breakers and scrap yard (the Wharf became part of Riverside Country Park in 1997).
- 1946: the map demonstrates further development to the south of the railway line, demonstrating the residential expansion of Rainham.
- 1960: the aerial view shows the fruit orchards within the site and further (suburban) residential development to the south of the railway line.

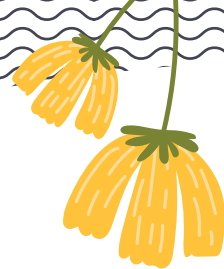


1897 Historical map



1923 Historical map

1 Information from <http://www.rainham-history.co.uk/>



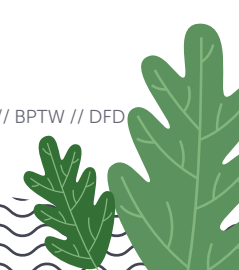
1946 Historical map



Bloor Wharf Historical Images
(www.shipsnostalgia.com)



1960 Historical map



07. Settlement overview

Today, Rainham is classified as a "District Centre", along with Strood, Rochester, Gillingham, and Hempstead Valley. Rainham provides essential services, and community uses to support sustainable living.

The site today

Today, Rainham is classified as a "District Centre", along with Strood, Rochester, Gillingham, and Hempstead Valley. Rainham provides essential services, and community uses to support sustainable living.

There are a number of existing primary schools within close proximity to the Site. The Rainham Mark Grammar School and The Maritime Academy are located to the south of the Site and provide secondary education. There are several secondary schools located beyond the immediate vicinity of the Site.

Frequent bus services operate along the Lower Rainham Road (routes 131 and 200A) and Beechings Way (routes 101, 116, 130, 182, and 200C) serve the surrounding area, providing good connectivity to Gillingham, Chatham, Hempstead Valley, and Maidstone.

Rainham railway station is located c.1km from the Site and provides

frequent services to London St Pancras, London Victoria, London Blackfriars, Dover, Ramsgate, and Faversham.

To the north of the Site lies the Riverside Country Park and Rainham Community Orchard. To the south of the Site is Bloors Lane Community Woodland and allotments, and to the north east of the Site are the Beechings Playing Fields.

Heritage and listed buildings

The local area developed along a network of north/south lanes that ran perpendicular towards the estuary, meeting at Lower Rainham Road. A series of farmsteads were set within this network of rural lanes, whilst more linear village-like development formed fronting onto these routes over time. Today we see a rich tapestry of heritage buildings.

Chapel house (fig.1 on this page) was originally a medieval house, now two, built in mid-late 15th Century. It was altered twice, once early-mid 16th Century and once early 20th Century.

Bay Tree Villa (fig.3 on this page) was built around 1820. Key features include flemish bond brick with brick lateral stacks and hipped tiled roof. The building has been listed as an example of a polite small rural house in original condition.

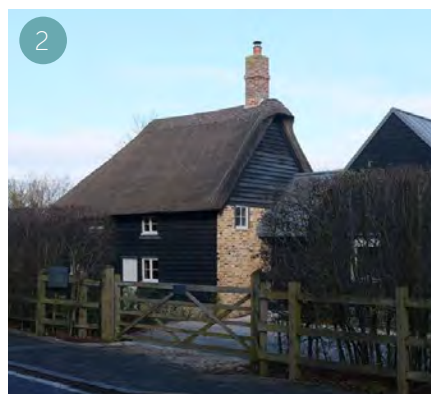
Pump Farmhouse (fig.4 on the opposite page) is at the heart of the site and is a medieval grade II listed farmhouse that was first built around late 18th Century. In early 20th Century, it was re-modelled and extended.

The Old House (fig.6 on the opposite page) dates back to the 15th Century. It is timber-framed with plaster infill, limestone rubble and brick, with a brick ridge stack and tiled hipped roof with right-hand cross wing.

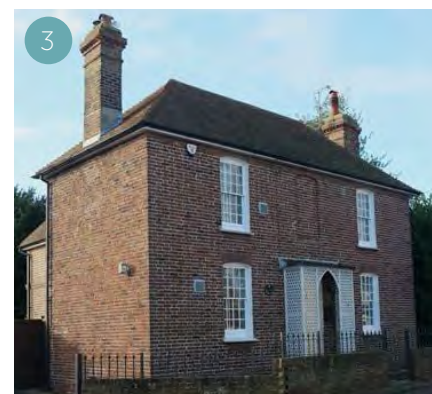
Bloors Place (fig.8 on the opposite page) dates back to approximately 1470-1510, for Christopher Bloor. It consists of a timber-frame, clad in red brick to ground floor and tile-hung above.



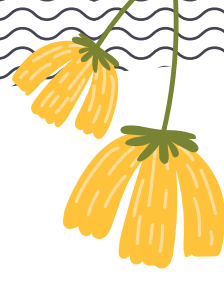
Chapel House (Grade II)



Black House (Grade II)



Bay Tree Villa (Grade II)



Pump Farmhouse (Grade II)



497, 499, and 501, Lower Rainham Road



Location plan



The Old House (Grade II)



Range Of Outbuildings Including Cart Lodge And Granary West Of Bloors Place (Grade II)



Bloors Place (Grade II*)



08. Site Context and Opportunities

The Site sits within a unique rural context related to landscape, flooding, heritage and local movement network.

Technical considerations

Landscape

A Landscape and Visual Appraisal has assessed the emerging development. Based on that assessment it is concluded that development on this site of the kind proposed has only a very limited potential to cause adverse visual impacts and a lowering of the existing visual amenity for most receptors.

Due to the nature of existing vegetation cover along the site boundaries and within the surrounding landscape and the railway line to the north, the site has a very small visual envelope with views of the site being large limited to locations immediately adjacent to the site boundary and from the elevated foot bridge across the railway line and the Bridle Way which cross the site directly.

Overall it is therefore likely that the proposed development would result in a Neutral impact upon Visual Amenity in the Long term at the site scale, and no visual impact at the local scale or beyond. On balance it is therefore concluded that this site and its surrounding landscape has a High capacity to accommodate development of the type and scale proposed. Whilst there would be a permanent and major change to the appearance of the site itself this would be experienced from only a very small number of locations.

The proposed development itself is capable of appearing as a high quality and visually attractive development that would not be considered to be uncharacteristic or out of keeping the wider landscape context and is not likely to be considered to be most people to be a visual detractor, and therefore would not result in a long term lowering of the quality and conditions of views nor the overall perceived visual amenity experienced by future receptors.

It is therefore concluded that the site and development could be accommodated into the landscape without causing significant long term adverse effects.

Flood Risk

The entirety of the Site is within 'Zone 1' Flood Risk as designated by the Environment Agency. It is therefore an acceptable location for development.

There are some small areas of the Site shown to be a low risk from localised surface water flooding, whilst there are some areas along Pump Lane that are at medium to high risk of surface water flooding. This is not a significant constraint to development and will be taken into account in the final iteration of a layout plan for the Site, with residential development avoiding these areas.

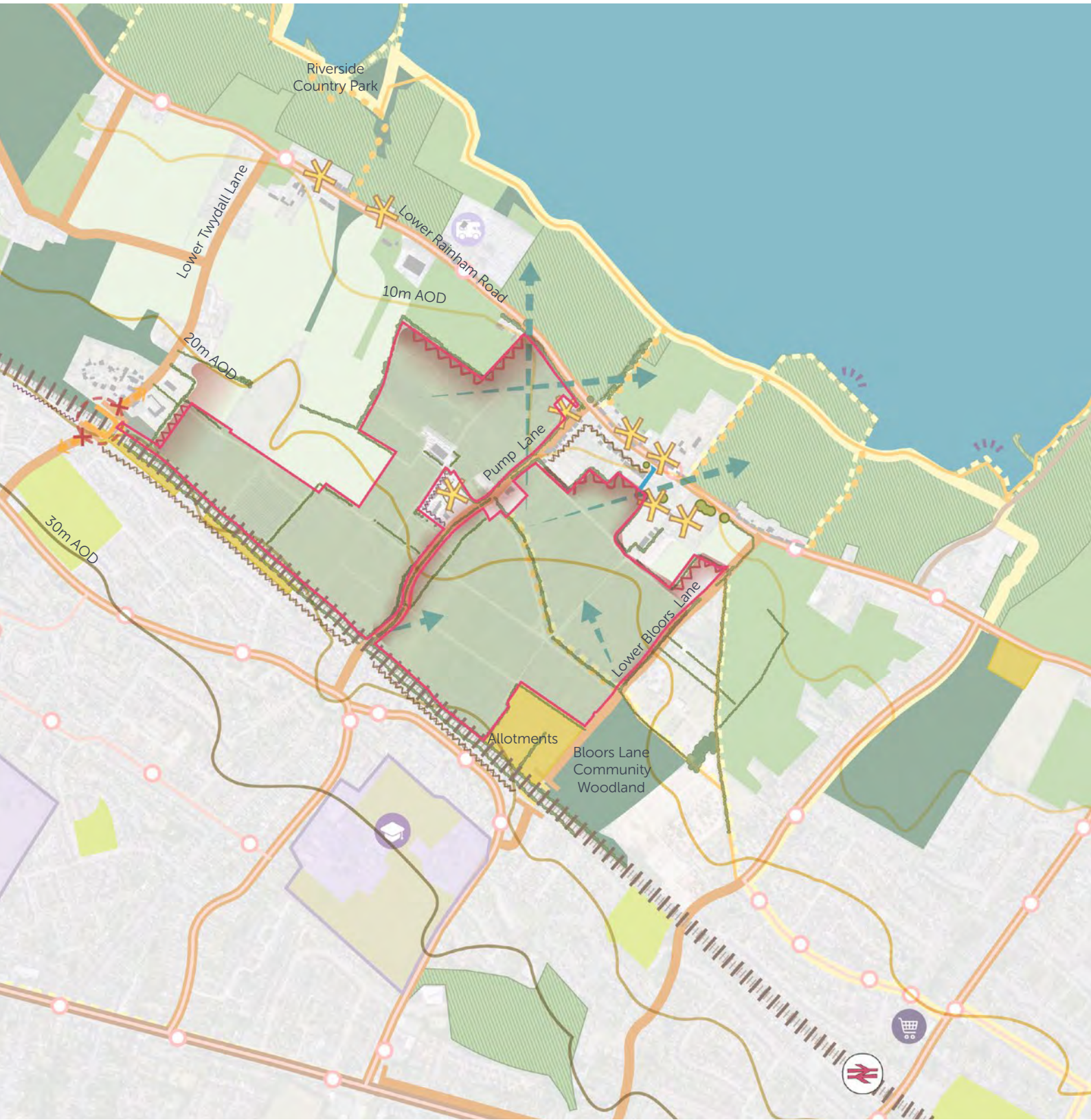
Heritage

The Pump Farmhouse, a Grade II listed building, is the only listed building located in the centre of the site, with a number of listed buildings within close proximity.

As set out within the Planning Appeal section, the very substantial benefits that would arise from the appeal scheme are considered to outweigh the heritage harm that is identified both individually and collectively.

Key

-  Views to be retained
-  TPO
-  Existing trees and hedgerows
-  Back of houses
-  Listed building
-  Existing pedestrian railway crossing currently closed
-  Landscape sensitive areas



Constraints Plan





BMV

The site is identified as Grade 1 (8ha), Grade 2(40.6ha) and Grade 3a (2.3ha) Best and Most Versatile Land. The NPPF acknowledges this should be protected unless material considerations indicate otherwise. Given the serious shortfall in Medway's Housing needs and that this proposal is seeking to deliver substantial community benefits, it is considered that the benefits outweigh the loss of the BMV value of the land.

Ecology

The site is an active commercial orchard and accordingly, the ecological interests on the site are largely confined to the margins and hedgerows. The previous ecology work identified the site contained around 26 species of birds recorded (17 species presumed breeding), at least 5 species of foraging/commuting bats, foraging/commuting badger and Slow worm and common lizard present within southern and central boundaries. It is considered that subject to appropriate mitigation strategies to be agreed with KCC Ecological services and the Council, the impacts on the existing ecology on site can be satisfactorily addressed and indeed enhanced. In this regard, the site will seek to achieve at least a 10% increase in Biodiversity Net Gain.

Highways

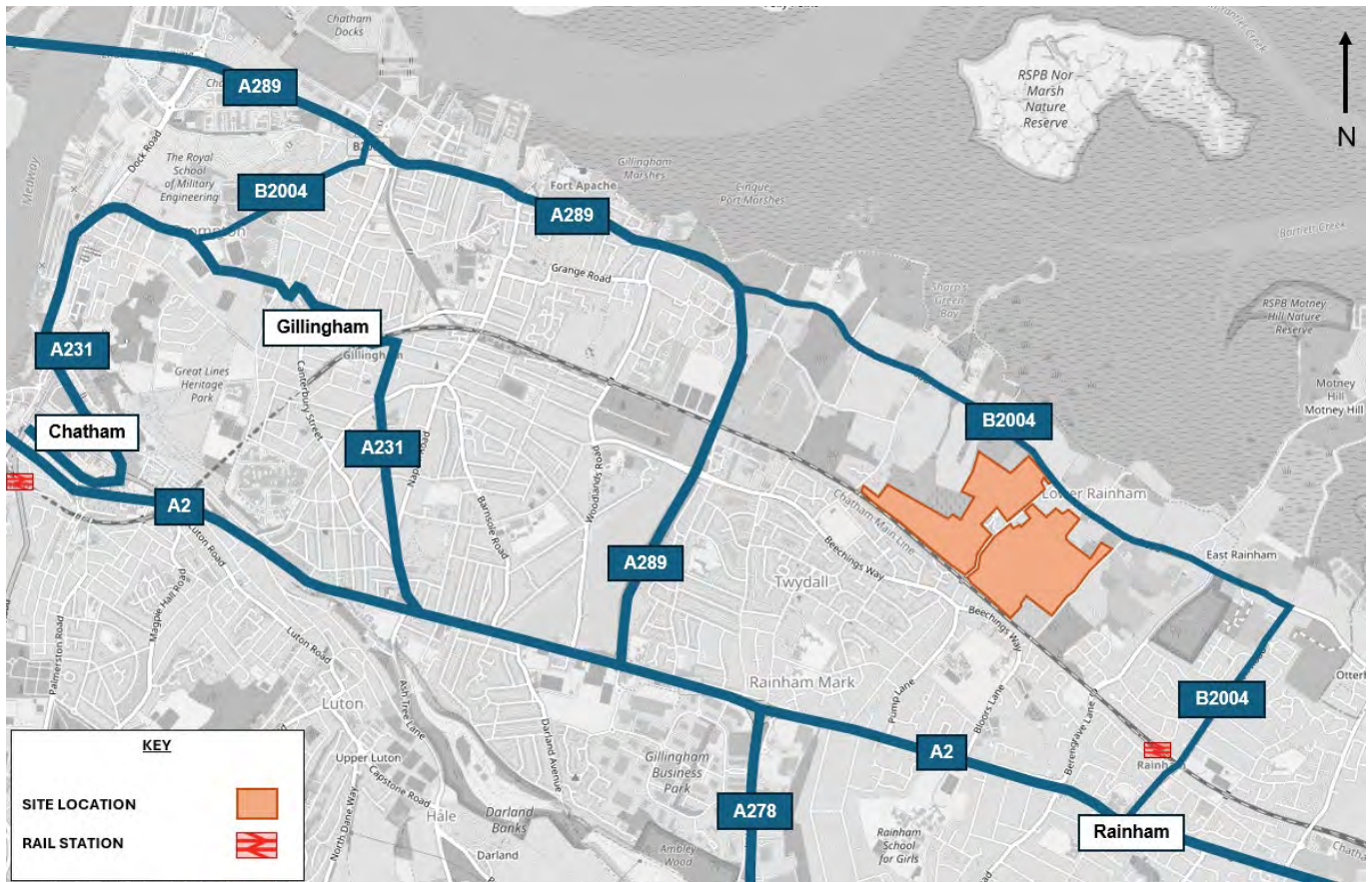
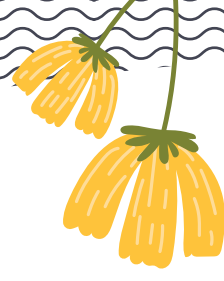
A review of the highways proposals put forward as part of the previous Appeal have been assessed to determine the suitability and safety of the access location and the impact on the local road network. It is evident from the review of the 2019 planning application submission, post-submission and Inquiry documents that assessment of the traffic impact of development on this site will need to be based on a MC strategic model such as the Medway Aimsum Model (MAM). Given the approximate 38% reduction in the number of dwellings proposed from that which was applied for in the 2019 application, the reduction in the number of vehicle trips generated by the development is likely to be significant. As a result, the associated impact on the local highway network will also be reduced compared to the 2019 scheme.

Of notable relevance to determining suitability of the proposed development is MC's position, at the appeal for the previous site application, where they acknowledged that "it could be possible to reduce the impact of the development on the road network so as not to be severe if additional mitigation were to be secured". Given this comment was made based on the previous scheme, and the reduced quantum of development now being proposed, it is considered that development of the site will be feasible.

This is particularly true when taking into account the current development proposed and the focus on encouraging travel by sustainable / active travel modes.

The consultation draft of the NPPF, 31st July 2024, places a particular focus on the vision and validate approach and that a severe impact should only apply if this is met in all tested scenarios. Whilst the changes to the NPPF have not yet been adopted, it provides a focus on how it is expected new developments should be assessed. It would appear therefore that the currently proposed scheme is likely to meet this test.

The site access arrangements proposed for all modes as part of the 2019 planning application submission were accepted by MC. However, in order to maximise the accessibility to and within the site by walking, wheeling, cycling, public transport and shared travel, the internal layout will need to be designed to prioritise movement by these modes over cars. As such, the internal street layouts and active travel routes will be designed to accommodate this, and to provide connections to routes off-site to facilitate access to facilities and destinations in the wider area by sustainable modes. This will involve engagement with both the Landscape and Highways teams at MC during the planning process to agree on suitable arrangements that will help to achieve the vision of having active and sustainable travel at the core of the development.



Site location and local highway network - Local Plan Transport Representations
Source: © OpenStreetMap contributors with Pell Frischmann annotations

In addition, further engagement and evidence gathering will take place including with Arriva and MC to discuss the details and requirements for the proposals to extend an existing bus service to route through the site, which Arriva have confirmed they are supportive of previously.

A review of existing walking and cycling routes has shown that the site can be easily integrated into the local pedestrian / cycling network offering the opportunity for sustainable travel around the local area.

We will also seek to investigate potential improvements that could be made to existing routes off-site in order to enhance active travel links and connectivity in the area.

It is also evident that the site is located in proximity to multiple existing amenities, including schools, GP surgeries, transport services, shops and leisure facilities including open space / country parks.

The outcomes of this report indicate that development of the site is deliverable, viable and can be achieved in alignment with National (both existing and consultation versions) and Local Policy. Therefore, it is considered that the site is appropriate for allocation in the emerging Medway Local Plan.

The highways impact continues to be assessed and evolves as statutory consultees are engaged and the design evolves.



08. Site Context and Opportunities

The Site can enhance a range of landscape, heritage and movement opportunities to create a local place that celebrates the local rural character.

Opportunities

Landscape

- The existing network of open spaces, including hedgerows and trees within the Site can be integrated within the wider green and blue infrastructure strategy.
- There is a gentle change in topography within the Site- with opportunity for proposed SuDs to follow this.
- Opportunity to link to the wider leisure corridor, including the Country Park, Bloors Wharf, Rainham Dock and Eastcount Meadows Park.
- Opportunity to include the existing historic lanes within the proposal.
- Opportunity for including food growing and edible landscape within the Site, linked to its former use.
- Consider views from the Country Park and include trees and landscape screening.












Heritage

- New homes and buildings to reflect some of the features of the listed and farmstead buildings within the site proximity, such as details, use of materials, typologies or boundary treatments
- Opportunity to include a farmstead approach both for residential and mixed uses.

Movement

- The existing north-south running lanes to be included within the proposal as key active travel routes, connecting key destinations with new homes and linking the wider green infrastructure network.
- Potential for including mobility hubs at key locations and within 400 meter access to all properties. A key mobility hub should be included in proximity of the local centre and school.

Key

	Red line Site Boundary
	Rainham Railway Station
	Bus Route
	Bus Stops
	National cycleway
	Cycleway
	Public ROW
	Footbridge
	Local park
	Schools
	Local facilities



Opportunities Plan



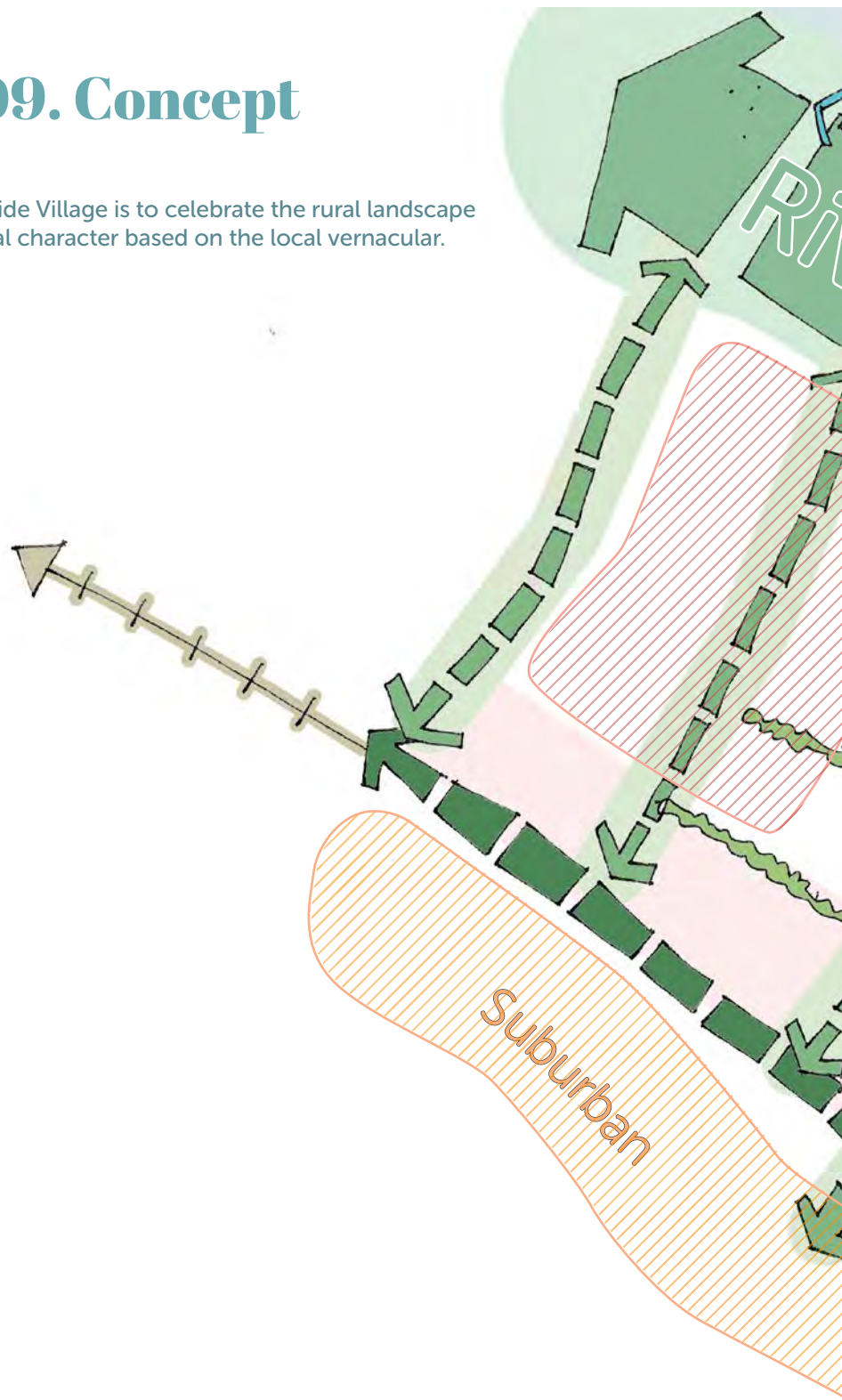
09. Concept

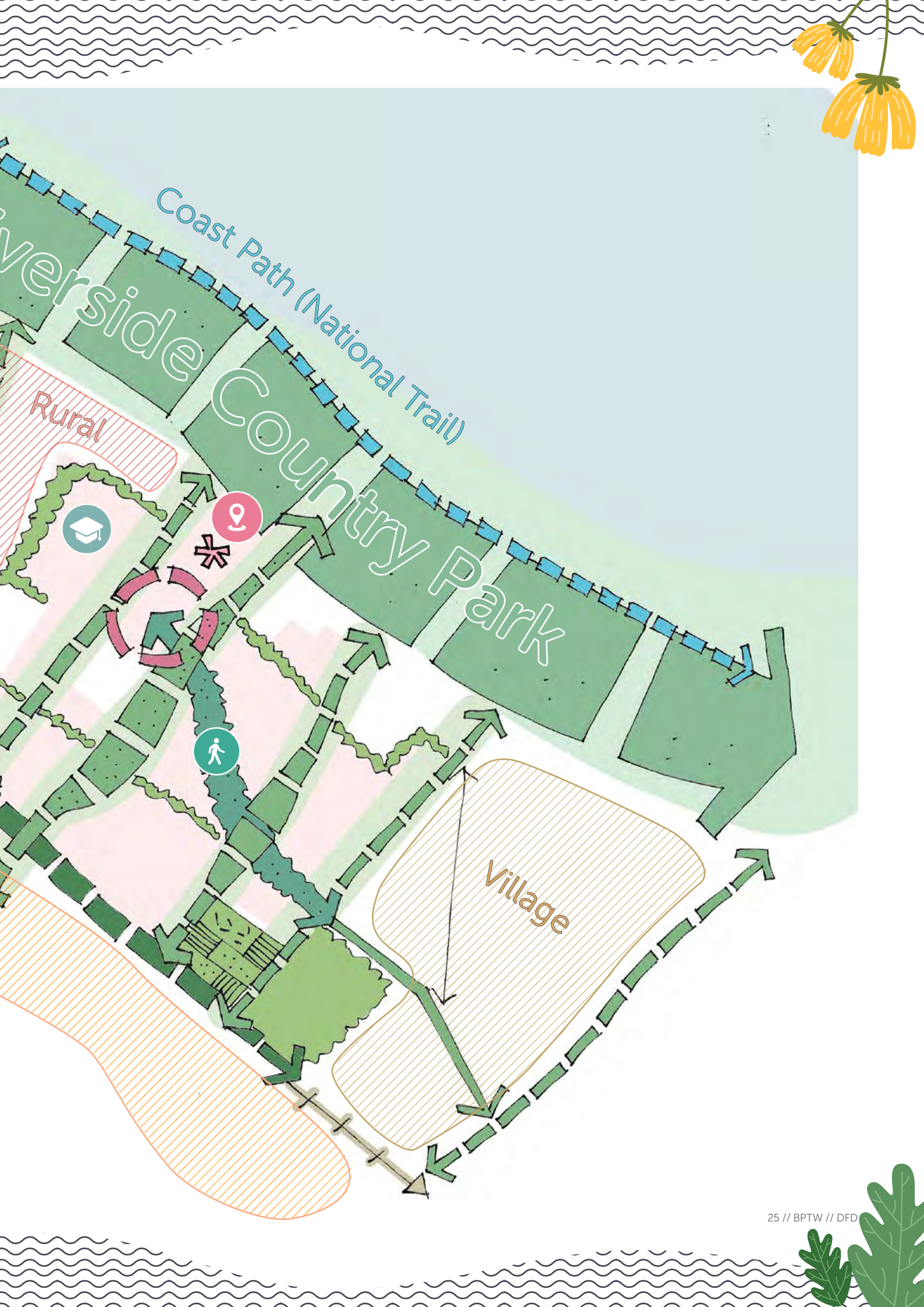
The concept for Rainham Parkside Village is to celebrate the rural landscape and create a rich architectural character based on the local vernacular.

The Concept for Rainham Parkside Village is based on the following principles:

- Demonstrating the urban to rural transition by developing a layout that celebrates the rural context, landscape and development patterns and avoids suburban approaches.
- Creating a mosaic of “farmsteads” plots suitable for a range of SME builders.
- Creating a new village heart with non residential uses (including a school, a local centre, a care home) clustered to towards Low Rainham Road fronting the central open space and promoting active travel;
- A network of safe and direct routes to the wider leisure corridor to the north and links to the National Trail
- A comprehensive active travel network defined by green corridors following the historic lanes, field lines hedgerows and tree clusters. These will act as connected active travel routes and link the green and blue infrastructure within and outside the site.
- A green buffer will screen the railway line, while also providing a key east west leisure route, with additional landscape buffers introduced in more visually sensitive edges.
- The existing east west pedestrian link will be enhanced, connecting the local centre to new homes and smaller open spaces. #

Rainham Parkside Village will integrate the suburban context (to the south of the railway line), the rural agricultural context to the west) and the village character to the east.





Existing routes, gateways and hedgerows



Existing routes, gateways and hedgerows will be retained and enhanced where possible:



Retain the existing hedgerows and cluster of trees



Enhance the existing east west pedestrian route within the hedgerows



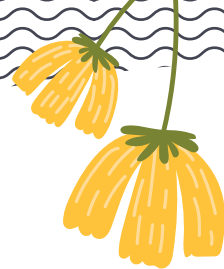
Design proposal to incorporate the existing field lines where possible



Connect to the existing woodland and allotments



Consider the existing pedestrian and vehicular gateways into the site



Proposed green network and wider movement network



The proposed green network and wider movement network is based on created new connected routes and spaces based on a green grid that celebrates the local landscape:



Incorporate the existing hedgerows and cluster of trees to include active travel routes and biodiversity corridors



Existing east west pedestrian route within the hedgerows - key active travel route connecting the new central open spaces



Existing field lines to structure the wider network of routes and open spaces



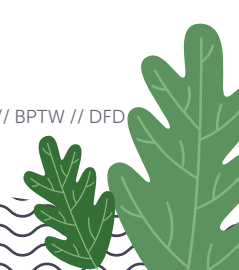
Central woodland



Northern gateway - new square along Lower Rainham Road leading to the local centre



New 'field' open spaces



10. Site proposal

The proposal for the Site will deliver a series of 'farm plots' where a mosaic of contemporary farmsteads will celebrate the rural character and delivered by a range of SME builders

Our proposal for Rainham Parkside Villages positively responds to the Site-specific constraints and opportunities to deliver a mixed-use development inspired by the rural context. It is rooted in a truly landscape-led design ensuring it appropriately respects the site and its surrounding context whilst making an efficient use of the Site.

The proposed development is designed to come forward through an SME consortium, whereby the Site will be defined by a series of SME plots to speed up the delivery of high-quality homes. The following chart demonstrates the potential for higher delivery rates with greater SME involvement:

No. of SME's	Dwelling output per annum
1	40
2	80
3	120
4	160
5	200
6	240

The layout demonstrates how up to 800 residential dwellings can be successfully delivered on site, including 30% affordable housing, with multiple access points from the Lower Rainham Road, and Pump Lane leading to Beechings Way.

The provision of up to 800 dwellings, including up to 240 affordable homes would make a valuable contribution towards the housing requirement and address the polarisation of the ageing population.

A range of dwelling types are indicatively proposed for the Site, including:

- 1, 2, 3 and 4 bed houses for affordable housing;
- 2, 3, 4 and 5 bed houses for private ownership;
- Bungalows for later living; and
- Self and Custom built.

The range of dwelling on offer, including bungalows and houses, would provide a new element of choice in the housing market for Rainham.

Alongside the provision of high-quality housing, the illustrative layout demonstrates how the Site would deliver a new local centre, a community building, children's nursery, care home, and circa. 16.2 ha of new public open space throughout the site, providing new recreational opportunities for Rainham.

New green infrastructure is proposed throughout the Site, including new structural planting along boundaries of the Site.

The proposed commercial uses provide for a significant benefit to the local community. The uses address specific and identified shortfalls in the local area and will not only serve the wider community but will inherently improve the sustainability of the location. The illustrative layout demonstrates how a low-density scheme could come forward albeit varying densities which respect the character of the area.

The majority of the Site remains undeveloped with numerous green spaces throughout the Site, including circa 4ha of informal open space to the east and southeast of the Site, providing increased recreational opportunities for Rainham.

Crucially, the development offer the opportunity for north south and east west connections, improving the connectivity between the current urban area of Rainham to the Riverside Country Park.

In addition to the site layout, Esquire Developments is proactively addressing the Climate Change emergency which the Medway Council declared in April 2019. In this respect, Esquire Developments is already adopting energy efficient measures in its building techniques, including air source heat pumps, not installing traditional gas boilers, taking a fabric first approach to the construction methods and supplying all homes with electric vehicle charging points. These measures can reduce carbon reduction by approximately 60% and significantly exceeds current and future building regulations.

Further, our proposal at Rainham Parkside Village is based on 15 minutes neighbourhood principles and aims to encourage a genuine modal shift to active and public transport..



Hazells Farm



Foxglove



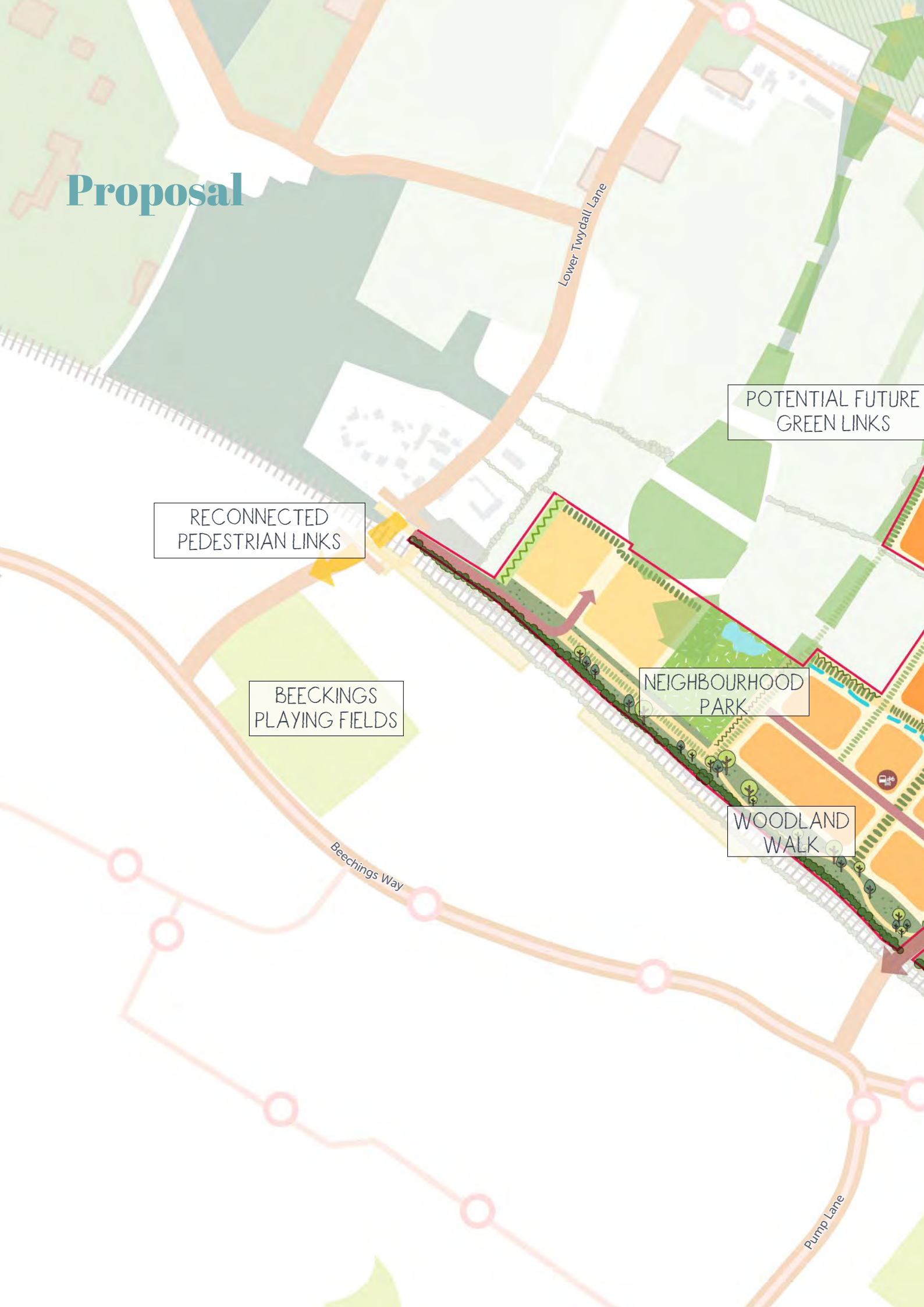
Riverbourne



Riverbourne



Proposal



RECONNECTED
PEDESTRIAN LINKS

BEECKINGS
PLAYING FIELDS

NEIGHBOURHOOD
PARK

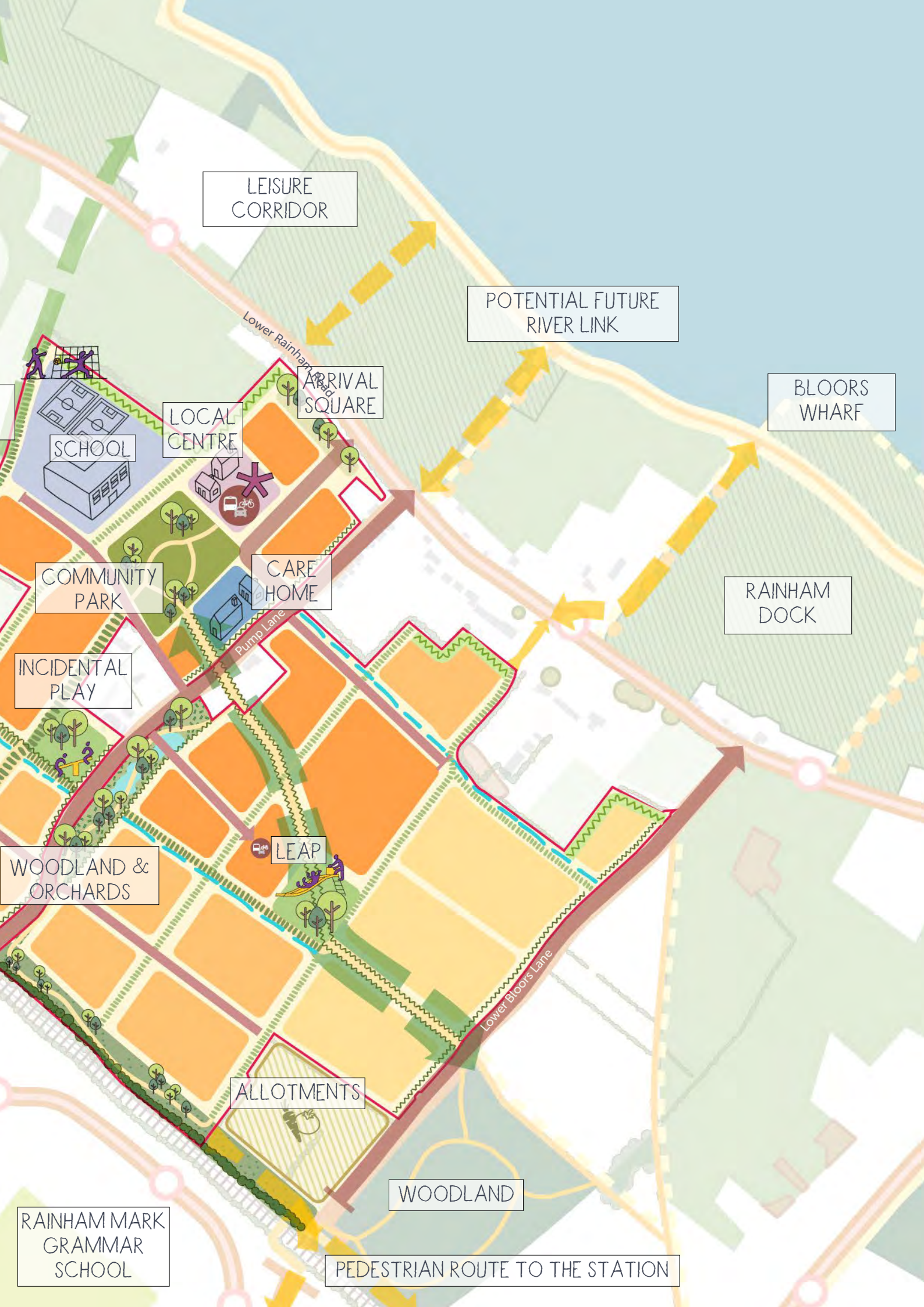
WOODLAND
WALK

POTENTIAL FUTURE
GREEN LINKS

Lower Twydall Lane

Beechings Way

Pump Lane



LEISURE
CORRIDOR

POTENTIAL FUTURE
RIVER LINK

BLOORS
WHARF

RAINHAM
DOCK

LOCAL
CENTRE

ARRIVAL
SQUARE

SCHOOL

COMMUNITY
PARK

CARE
HOME

INCIDENTAL
PLAY

WOODLAND &
ORCHARDS

LEAP

ALLOTMENTS

WOODLAND

PEDESTRIAN ROUTE TO THE STATION








RAINHAM MARK
GRAMMAR
SCHOOL

Street Types

The proposed street network is based on the existing structure of the established north-south lanes:

- Pump Lane is the primary vehicular street connecting Lower Rainham Road to Beechings Way, which will be enhanced to support and service the majority of the new neighbourhood. A northern route adjacent to the local centre has been introduced to provide a relief to the northern section of Pump Lane, to introduce a short segment of Pump Lane that acts as a one-way route fronting existing buildings and enhancing the listed building where Pump Lane meets Lower Rainham Road.
- A series of lower order 'Field Streets', which reference the former field lines, will provide vehicular connections across the Site. Each field street runs perpendicular to the north/south lanes.
- Lower Bloors Lane and Lower Twydall Lane provide local access to the eastern and western lower density plots, respectively. Opportunity to widen these routes could be explored in more detailed design work.

In order to promote more sustainable and active travel, mobility hubs will be provided at key locations, within a short distance from every home.

-  Primary Streets
-  Retained Lanes (Widened if required)
-  One way Pump Lane (Enhanced setting for listed building)
-  Low order "Field Streets"
-  Potential Narrow Shared Surface Link
-  Cross Streets could Stagger
-  Mobility Hubs - illustrative location

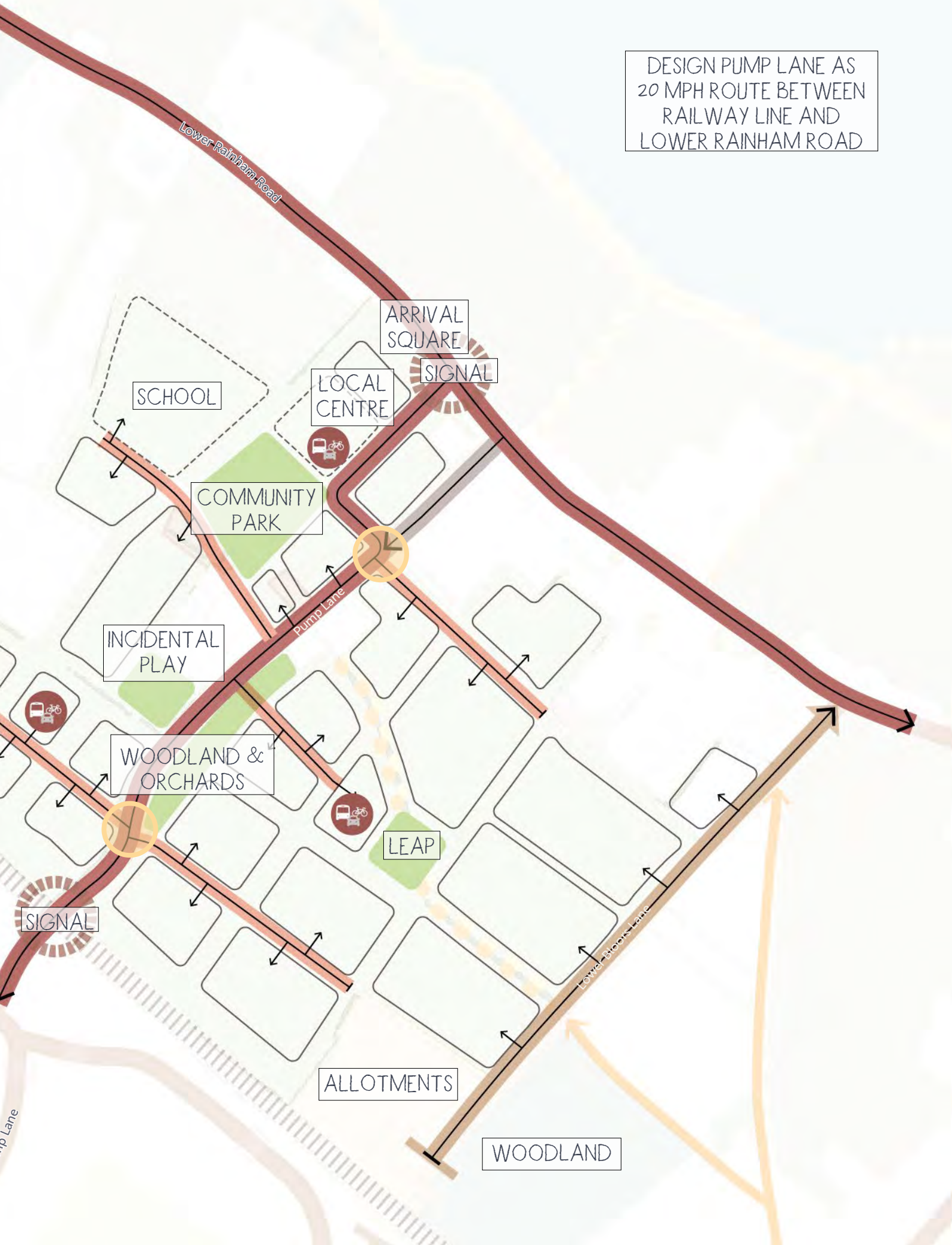
POTENTIAL LOW ORDER SHARED SURFACE CONNECTION

NEIGHBOURHOOD PARK

WOODLAND WALK

Beechings Way

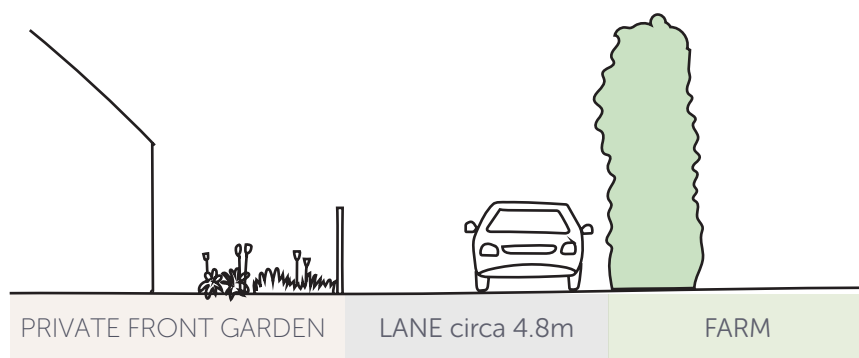
DESIGN PUMP LANE AS
20 MPH ROUTE BETWEEN
RAILWAY LINE AND
LOWER RAINHAM ROAD



Pump Lane existing street sections

Pump Lane is currently lined by tall hedgerows on both side of the street, or fronting homes, giving a strong rural character to the lane. However, the route is very narrow and gives no dedicated space for walking or cycling.

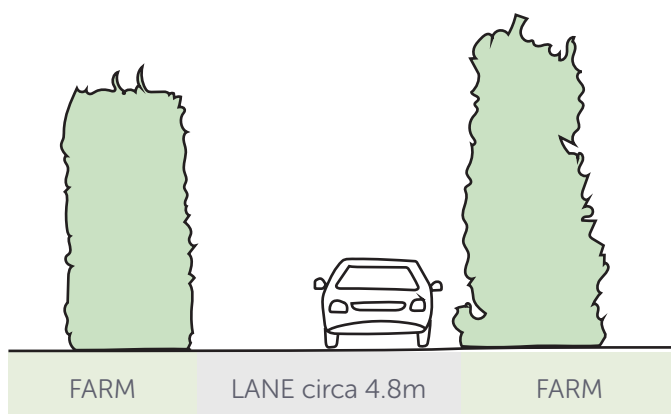
The northern portion of the lane has existing homes and listed buildings fronting both sides of the lane, and therefore the width of the street cannot be widened. In other areas, the site offers opportunity to widen the lane on at least one side of the lane.



- Rural Character



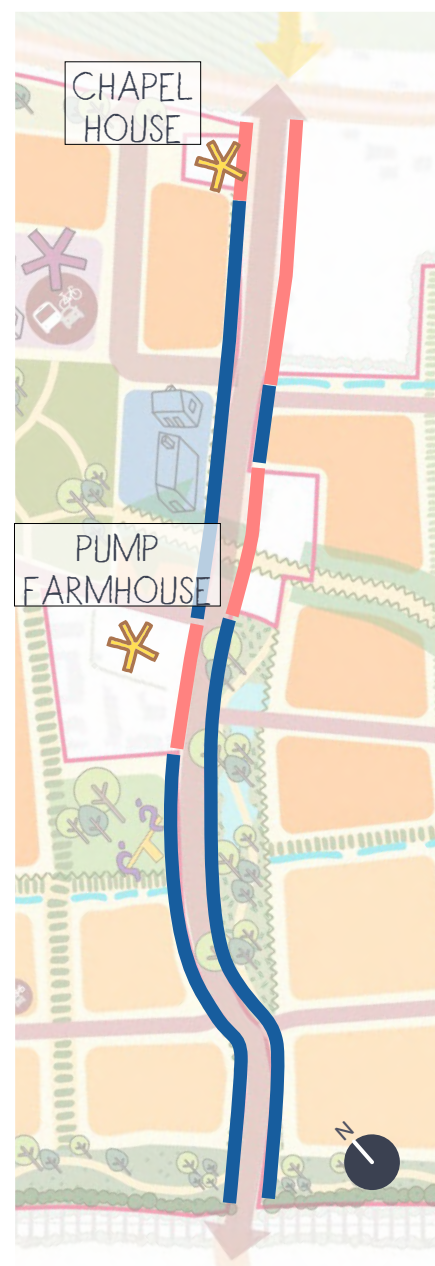
- Too narrow for two cars
- No dedicated pedestrian space



- Rural Character



- Too narrow for two cars
- No dedicated pedestrian space



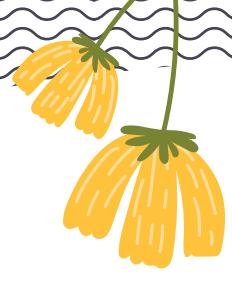
Listed buildings



Areas within the site with no existing buildings/structures fronting the street



Areas outside the site with existing buildings/structures fronting the street

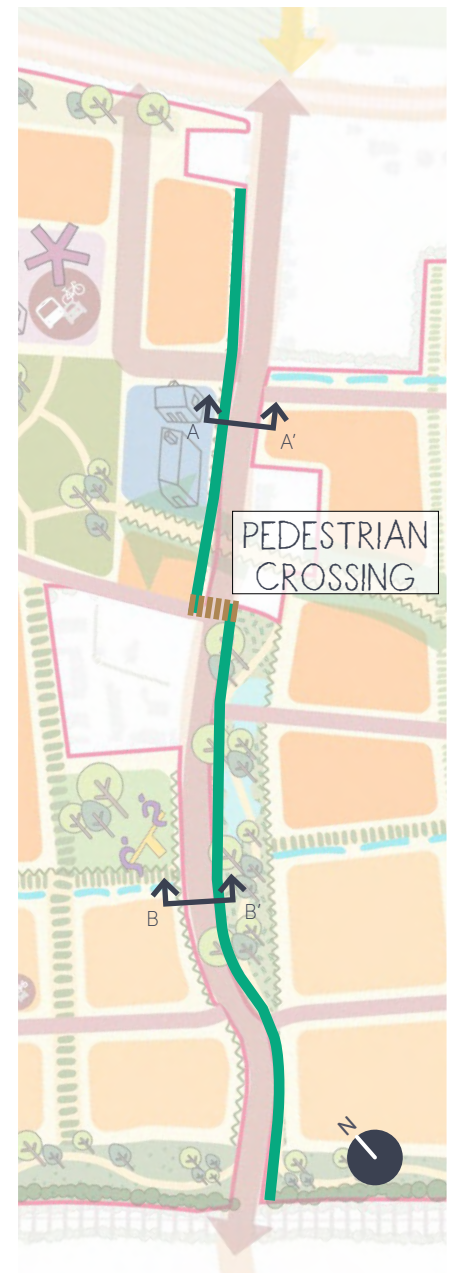
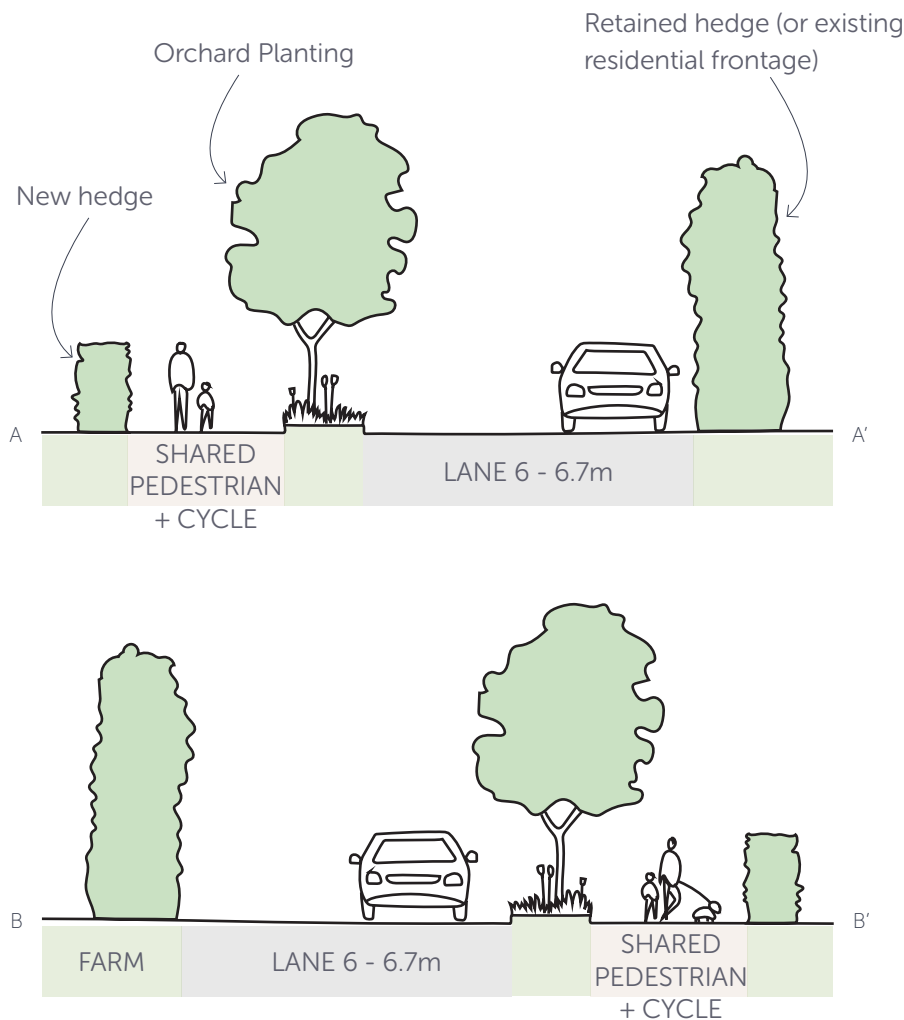


Pump Lane proposed street sections

In order for Pump Lane to continue to remain the primary lane for the new community, the carriageway width needs to widen to allow for two vehicles to pass one another, including future potential buses. This means the 4.8m width needs to widen to up to 6.7m wide, whilst an introduction of a shared walking and cycling path will promote active travel, which will continue in front of the listed building at the junction with Lower Rainham Road.

The rural character of the lane will be maintained with retained hedgerows, introduction of new hedgerow planting, a planted verge that integrates landscaping that references the rural farmsteads and retained open space in certain areas along the length of the lane.

A central zebra crossing can link the eastern and western shared pedestrian/ cycle routes, and informal crossing will enable tertiary crossing points along the length of an enhanced Pump Lane.



Active Travel Routes

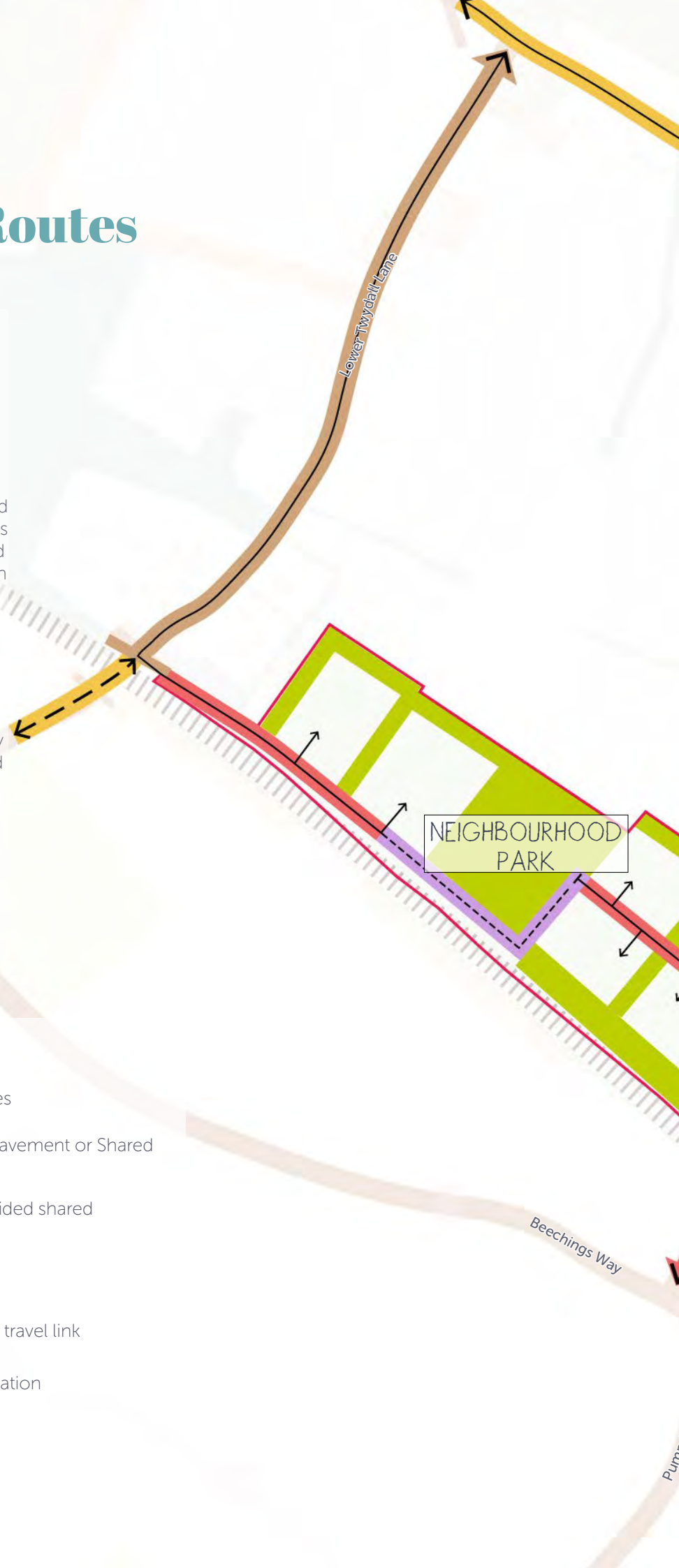
The new neighbourhood will be designed as a safe, connected grid of dedicated and shared walking and wheeling routes, creating a place that promotes health and wellbeing and genuine connection with nature.

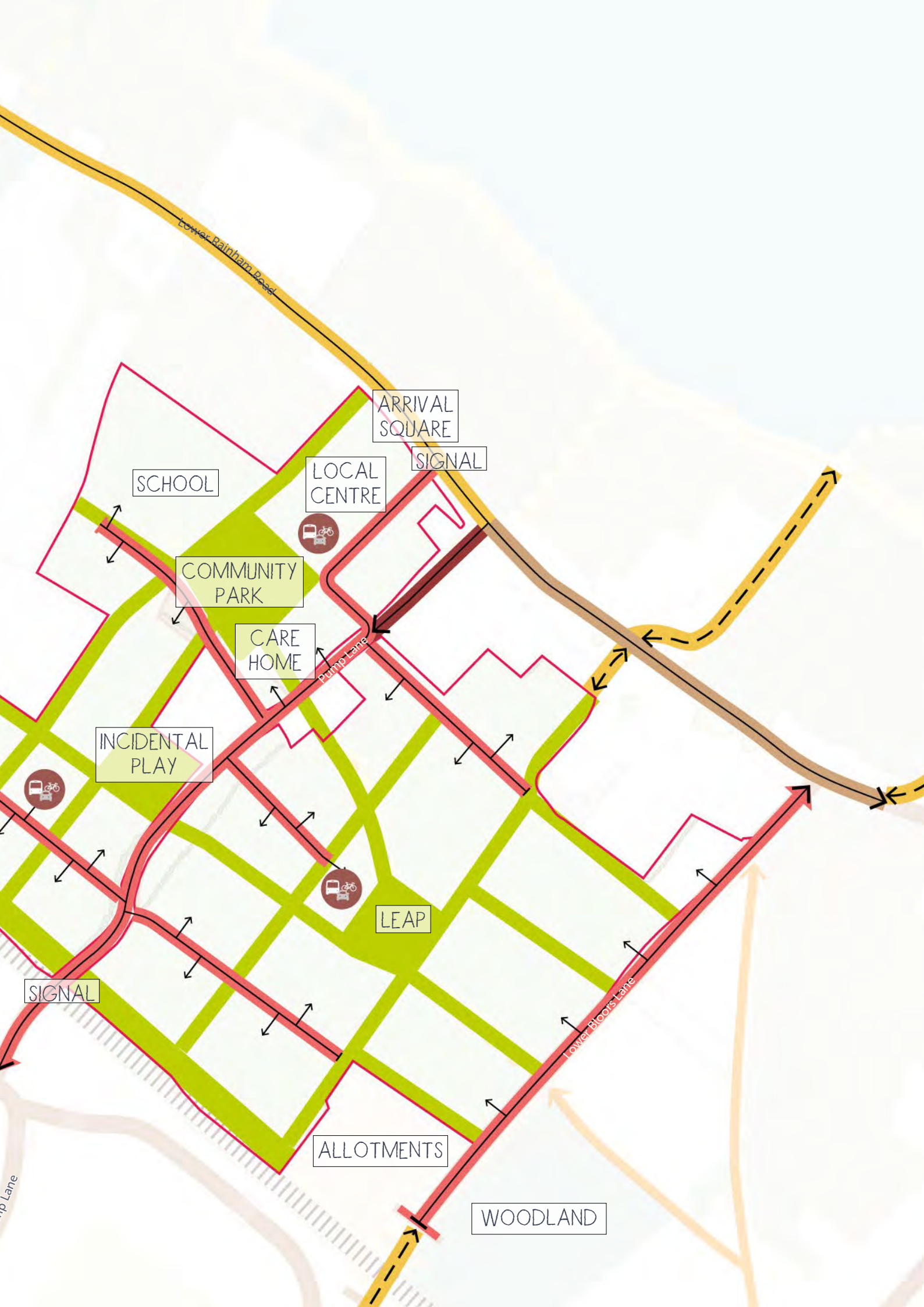
The proposed active travel network retains existing public rights of way, and creates green corridors framed with hedgerows and trees that culminate in key local destinations such as community open spaces, proposed primary school and central local centre with a range of local mixed uses.

Routes within plots have been identified to prioritise active modes of travel, particularly for shorter journeys. To encourage active travel, each farmstead plot will have multiple connections to the north, south, east and west, encouraging the community to walk or wheel within the neighbourhood or within the wider context.

The green routes within the site will reinforce wider area connections towards Bloors Wharf and Riverside Country Park to the north; active travel links to the south across the railway line; and convenient connections to the amenities and railway station in Rainham.

-  Off Site Existing link
-  Dedicated Active Travel Routes
-  Shared Active Travel Route (Pavement or Shared Surface)
-  Traditional Lane with single-sided shared pedestrian and cycle path
-  Dedicated or Shared Route
-  Potential for enhanced active travel link
-  Mobility Hubs - illustrative location





Illustrative plot studies

Local centre

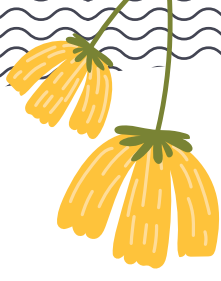
A series of mixed and community uses, including new primary school, will anchor the new neighbourhood, provide easy access from the wider community to uses and be within a short distance to existing bus services. These mixed and community uses have been determined by assessing the missing uses within the wider area, and to address the likely needs from future residents to create a more vibrant and sustainable neighbourhood.

The following uses are proposed, including potential business uses fronting onto the arrival square at Lower Rainham Road:

- 2FE primary school (3ha)
- Children's nursery (615sqm + parking)
- Community hub – 160sqm
- Healthcare hub – 160sqm
- Care Home – 1.5 acres

The layout of the local square will be based on rural clustering of agricultural buildings to create a series of connected open spaces to provide spaces for play, nature, local events and socialising. The design of the buildings will appear as a collection of contemporary farm sheds, celebrating local materials and details whilst providing vaulted spaces and a strong rural aesthetic.





The Farmstead, Linmere, Houghton Regis



Dollman Farm, Houlton, Rugby



Cafe Hogmoor, Bordon



Illustrative plot studies

Farmstead plots

Outside of the local centre, the site will be defined by a series of farmstead plots, with greater clustering of homes in small terraces and semi-detached homes closest to the local centre, and lesser densities beyond.

Each farmstead plot will create a distinct local place based on the immediate site context. Each will be defined by a rural palette of materials and reference the local vernacular, such as the existing farmsteads within Lower Rainham and listed buildings along Pump Lane and Lower Rainham Road.

Farmstead plots will celebrate the strong rural character in both built form and greenery, which responds to the rural and food growing context. Each plot will develop up to 30 dwellings per hectare and be designed as a series of small lanes and spaces to create a strong sense of community amongst the future residents. Each plot will have multiple pedestrian links to the grid of activate travel routes.



The illustrative plot study demonstrates how each orange farmstead plot can be developed.



Existing farmstead development along Pump lane



Hill Farm



Hill Farm



Riverbourne

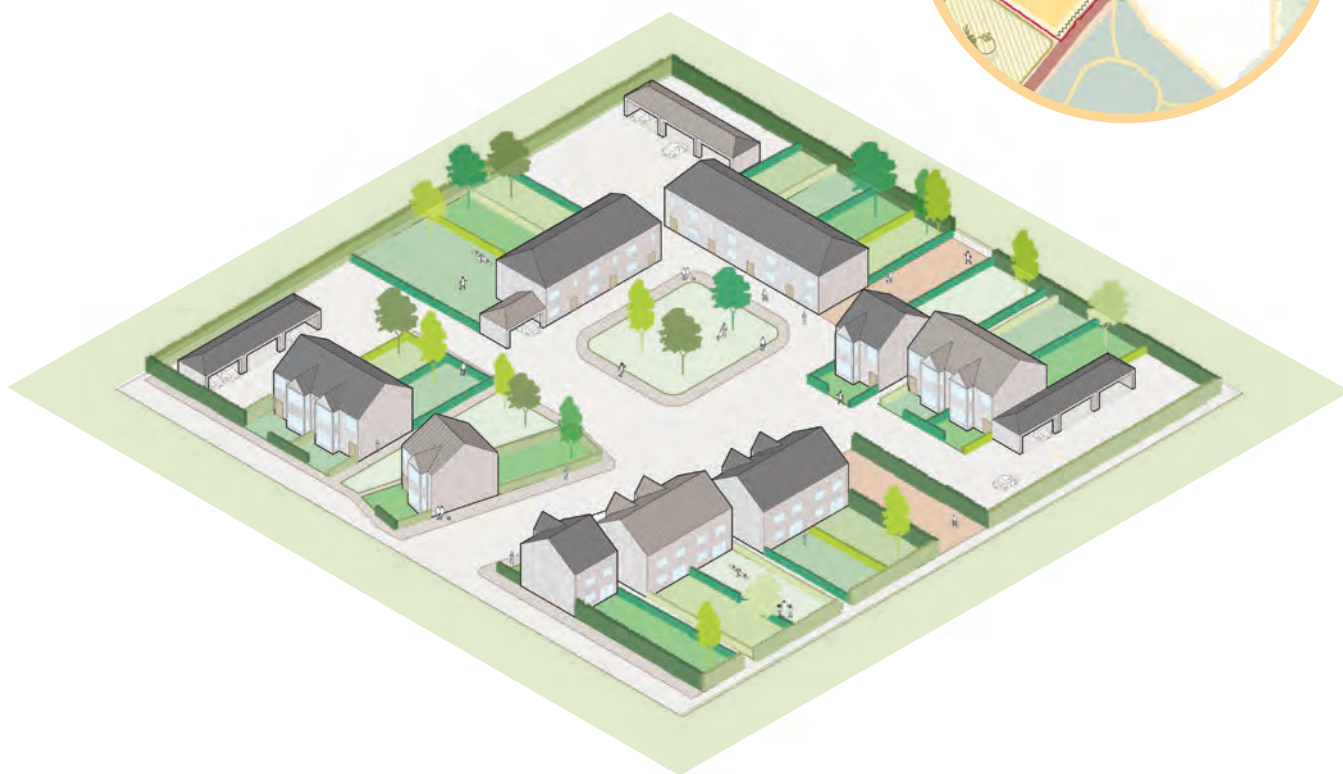


Illustrative plot studies

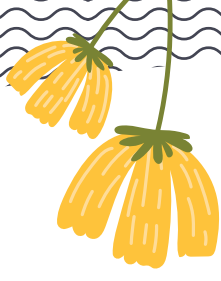
Lower density farmstead plots

To the periphery of the Site, lower density farmstead plots will provide greater greenery, more open space and lesser impact on adjacent lanes and next to existing development, such as along Lower Twydall Lane to the west and Lower Bloors Lane to the east.

These plots will range in density, but each plot will be lower density, typically delivering around 20 dwellings per hectare through detached, semi-detached and small terraced housing types. Homes will celebrate the local vernacular and clustered to create a central focus for each SME plot. Each will have a single vehicular entrance and series of pedestrian routes connecting to the wider active travel network.



The illustrative plot study demonstrates how each yellow lower density farmstead plot can be developed.



Dollman Farm, Houlton, Rugby



Millers Field



Cheshire Countryside farmstead development



Existing properties at Lowndres Farm, Cheshire Countryside



Local centre



Farmstead plots



Circa 30dph

Lower density farmstead plots



Circa 20dph

Lower Twydale Lane

56

36

33

36

Site Area
51
Hectares



- Local Centre 0.3 ha
 - School 3 ha
 - Care Home 0.6 ha
 - Open space 15.4 ha
- Approx 800 new homes - 31.7 ha**
- Approx 200 homes at 20 dph
 - Approx 274 homes at 25 dph
 - Approx 326 homes at 30 dph

11. Way forward for a sustainable neighbourhood

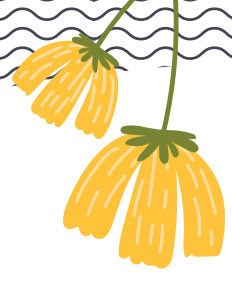
The DFD is prepared for illustrative purposes to allow a greater understanding of the Site's opportunities and constraints.

Esquire Developments understands the importance of early engagement and, to ensure views of local stakeholders are taken on board, will undertake a number of engagement exercises as the scheme progresses.

Initially, informal engagement will be undertaken with Rainham Parish Council, as well as neighbouring residents and community groups.

Alongside this, ongoing discussions will continue with Medway Council to promote the site for allocation through the emerging Local Plan review, as an appropriate location for development.





Economic

As illustrated, the proposed development would bring about numerous economic benefits to the local and wider economy through the provision of construction jobs, increased economic output through the residential population and commercial expenditure in the local economy.

The proposed development would thereby support the economic dimension of sustainable development.

Social

The provision of up to 800 new homes including 240 affordable homes (30%), is a significant social benefit of the scheme which will help support the vitality of Rainham.

Furthermore, the delivery of a range of dwelling sizes and types will help provide opportunity and choice in the housing market, including the provision of bungalows for sheltered housing and private ownership.

The proposals also seek to bring forward large areas of open space. Therefore, bringing further social benefits through the provision of new recreational activities.

Environmental

Development proposals will contribute towards the environmental dimension of sustainable development through provision of new landscaping, open space and other green infrastructure on the Site.

The proposed development will seek to promote opportunities for habitat enhancement, providing a positive contribution to biodiversity across the Site. The proposed development will provide 10% Biodiversity Net Gain.

Crucially, Esquire Developments' ethos is to meet and exceed Carbon Reduction requirements. This means Esquire homes tend to be up to 60% carbon efficient. This is delivered through a fabric first approach, air source heat pumps and the delivery of electric vehicle charging points on every dwelling.

Summary

The proposed development of the Site would meet the three elements of sustainable development in accordance with the advice in the NPPF. The Site is considered to be a sustainable form of development.





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Appendix E

Local Services Capacity Assessment (Marrons, August 2024)



Esquire Developments

Rainham Parkside Village, Medway
Local Services Capacity Assessment

July 2024



CONTENTS

PAGE NO

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3.0	ASSESSMENT METHODOLOGY	6
4.0	EXISTING COMMUNITY FACILITIES	10
5.0	REVIEW OF LOCAL EVIDENCE	23
6.0	ASSESSMENT OF LIKELY EFFECTS ON COMMUNITY FACILITIES	26
7.0	SUMMARY OF FINDINGS	32

APPENDIX 1: MEDWAY GROWTH AND INFRASTRUCTURE OVERVIEW

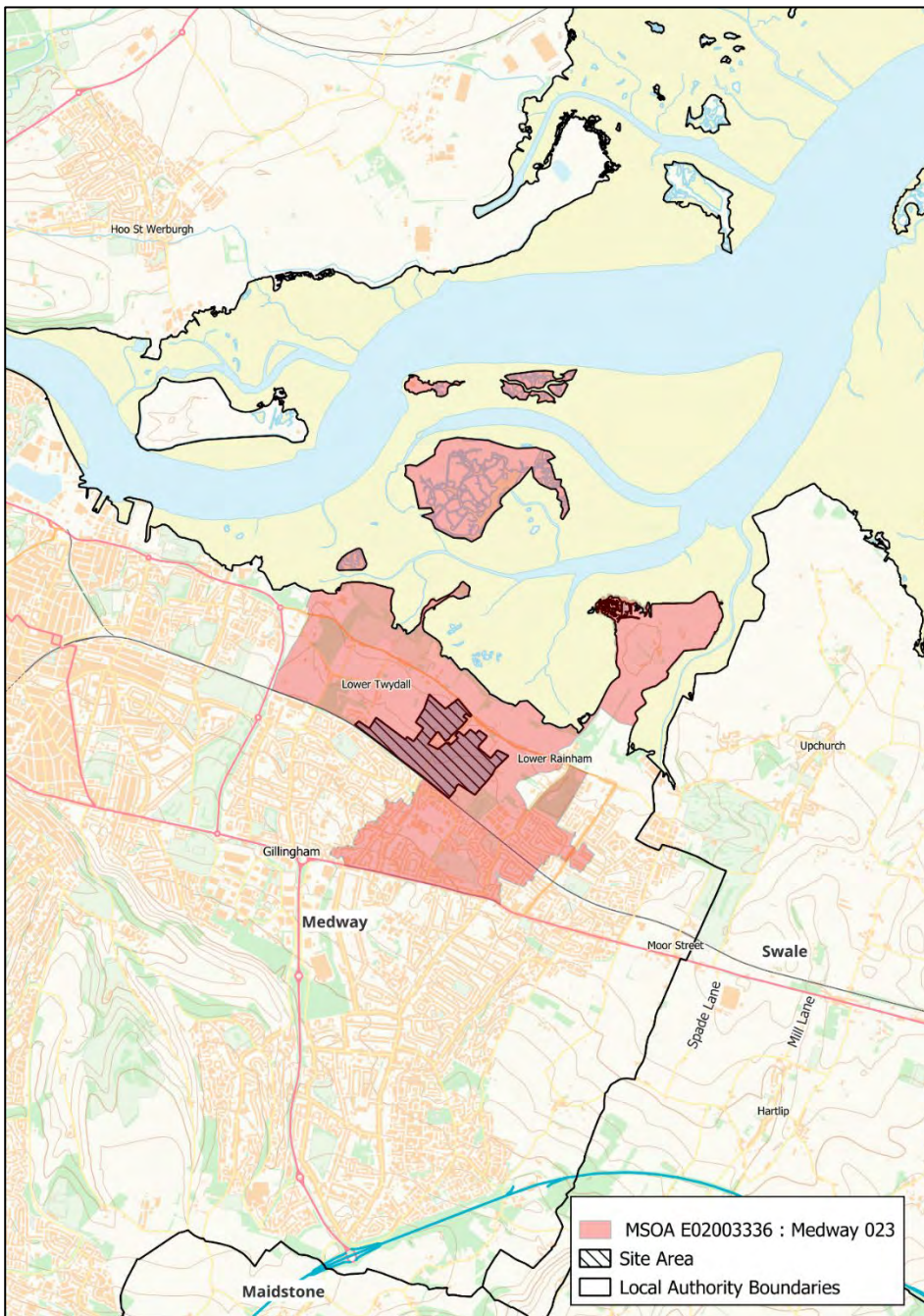
1.0 INTRODUCTION

- 1.1 This Local Services Capacity Assessment has been prepared by Marrons Socio Economics Team to support proposals for Rainham Parkside Village, Medway (from herein, also referred to as ‘the Development’) within Medway Council (MC). See Figure 2.1 for the Site location which includes a 2km buffer for the site catchment area (herein, also referred to as the ‘Study Area’).
- 1.2 The Assessment has been prepared to understand what community facilities exist in the area currently, and where possible, the capacity of such facilities, identifying any surplus or deficit capacity. The Assessment also calculates the demand for such facilities arising from the Development to determine whether new provision is required to support the Development or whether demand can be accommodated within the existing community facilities.
- 1.3 The community facilities considered by this assessment are:
- Day Nurseries;
 - GP Surgeries;
 - Dentists;
 - Libraries;
 - Community Centres;
 - Older persons Accommodation;
 - Open Space;
 - Retail.
- 1.4 The Assessment is structured as follows:
- Section 2: **Assessment Methodology**, details the data sources and methodologies which have been used to inform the assessment;
 - Section 3: **Existing Community Facilities**, will identify existing facilities in relation to the Development Site and surrounding area and their capacity, where possible;
 - Section 4: **Assessment of Likely Effects on Community Facilities**, will identify the likely effects of the Development on each community facility and propose any mitigation strategies that may be necessary to ensure a negligible to beneficial effect; and
 - Section 5: **Summary of Findings**, summarises the findings of our Assessment.

2.0 DEMOGRAPHIC PROFILE

2.1 This section of our analysis draws on the most recent demographic information available from the Office of National Statistics (ONS) to build a demographic profile of the development and the surrounding area.

Figure 2.1 Study Area for assessment



2.2 The Site is located in the MSOA 023. When applying the 2km buffer around the site for local services, the site boundary falls into 8 MSOAs as outlined figure 2.2 below:

Figure 2.2 Study Area MSOAs which fall within 2km buffer

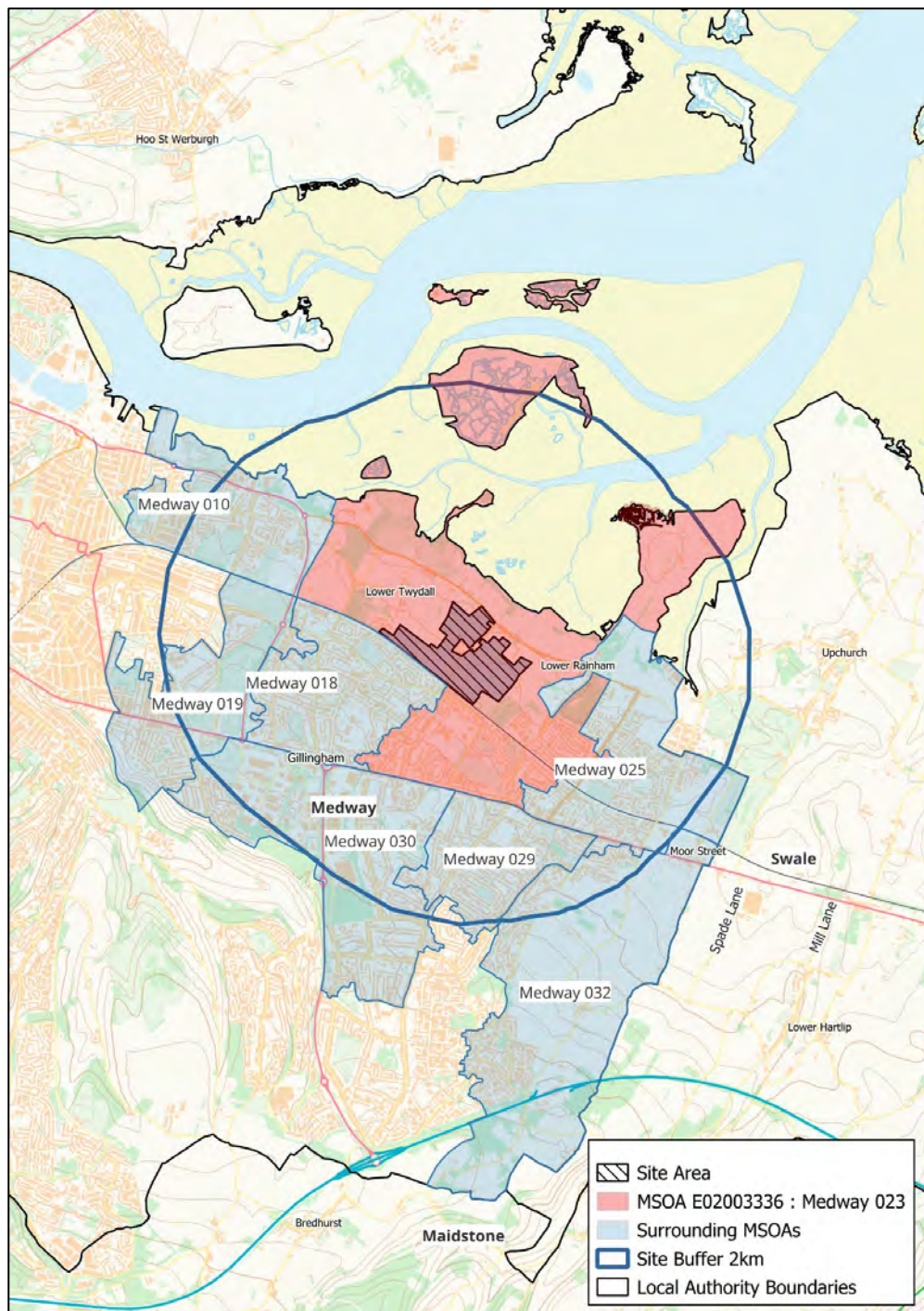


Table 2.1 Population change MSOA Medway 023 2011-2021

	2011	2021	2011-2021	2011-2021 %
0-17	1,097	1,253	156	14.2%
18-24	421	405	-16	-3.8%
25-44	1,195	1,470	275	23.0%
45-64	1,727	1,660	-67	-3.9%
65+	1,416	1,567	151	10.7%
Total	5,856	6,355	498	8.5%

Source: Census 2011,2021.

2.3 Table 2.1 sets out the population change in MSOA 023 between 2011 and 2021 Census. This illustrates a high growth rate in 25–44-year-olds in the area, with a total population growth of 23%. The 0-17 and 65+ age groups also saw notable increases of 14.2% and 10.7%, respectively.

2.4 Table 2.2 provides figures for the wider MSOA in close proximity to the development as shown in figure 2.2.

Table 2.2 MSOA Comparison areas population change 2011-2021

	Medway 023	Medway 010	Medway 018	Medway 019	Medway 025	Medway 029	Medway 030	Medway 032
0-17	14.2%	-6.7%	-0.5%	-5.4%	0.8%	2.8%	-7.7%	5.8%
18-24	-3.8%	-17.7%	-20.6%	-15%	-14.9%	-5.1%	1.9%	-7%
25-44	23%	-5.6%	7.9%	2.9%	2.9%	-0.7%	-8.8%	-0.3%
45-64	-3.9%	20.5%	0.7%	1.6%	0%	-8.1%	-9.9%	-7.5%
65+	10.7%	26.6%	4.3%	42.6%	25.7%	24.2%	31.2%	74%
Total	8.5%	1.6%	0.8%	4.7%	3.8%	2.5%	0.4%	6%

Source: Census 2011,2021.



2.5 Table 2.3 compiles census data from all MSOAs to show the population change from 2011 to 2021 within the 2km buffer area.

Table 2.3 MSOA Combined Comparison change 2011-2021

	2011	2021	2011-2021	2011-2021 %
0-17	11,959	11,931	-28	-0.23%
18-24	4,466	3,935	-531	-11.9%
25-44	13,178	13,472	294	2.2%
45-64	14,616	14,447	-169	-1.2%
65+	8,850	11,052	2,202	24.9%
Total	53,069	54,837	1,768	3.33%

Source: Census 2011,2021.

2.6 This data indicates that the MSOAs have a significantly aging population, with the largest growth rate at 24.9% in the over 65 age category. Consequently, facilities will need to be designed to meet the specific needs of the local population.

2.7 The latest 2018 based ONS population projections show population growth across Medway of +4.1% over the period 2021 to 2041. Over this period the area's population will grow from 279,771 people to 291,445. However it should be noted that the 2018 based projections do not incorporate the latest Census data and are also predicated on short term migration trends.

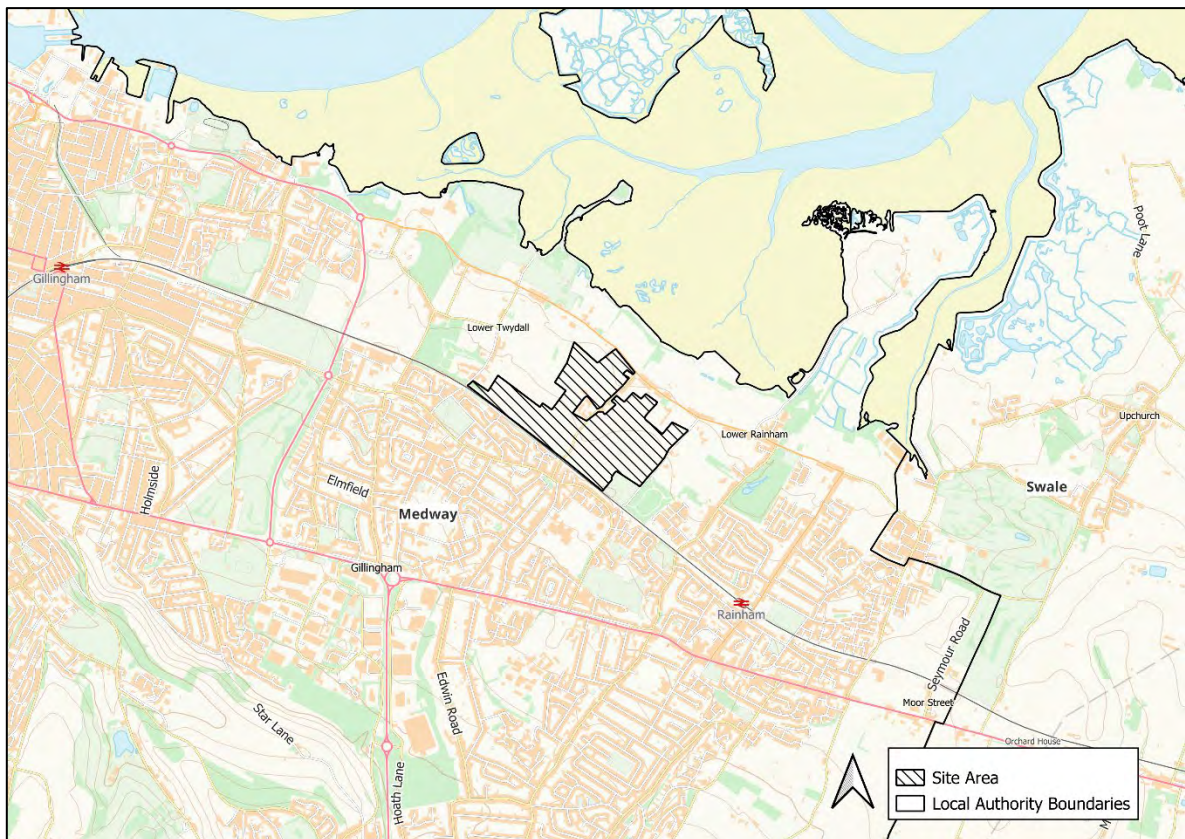
3.0 ASSESSMENT METHODOLOGY

3.1 This Section details the methodology used to undertake the assessment, including setting out the spatial scope of the assessment, the data sources and methodologies used for assessing the individual facilities and the criteria used to assess the significance of effects.

i) Spatial scope of assessment

3.2 The Site is located in the North-west of Rainham, in Lower Rainham. This is located to the east of the towns Chatham, Rochester, Strood and Gillingham.

Figure 3.1: Study Area for assessment



3.3 Table 3.1 details the spatial area used for each of the community facilities.

Table 3.1: Spatial area for individual facilities

Facility	Spatial Area	Justification
Early Years Education	The Study Area	People can register with any childcare provider. However, to limit assessment, provision within the Study Area has been considered as the area most likely to be impacted upon by the Development.
GP Provision	The Study Area	Since 2015, people can register with any GP of their choice. However, to limit assessment, provision within the Study Area has been considered as the area most likely to be impacted upon by the Development.
NHS Dentists	The Study Area	Provision within the Study Area has been considered as the facilities most likely to be impacted upon by the Development.
Libraries	The Study Area	Provision within the Study Area has been considered as the facilities most likely to be impacted upon by the Development.
Community Halls	The Study Area	Provision within the Study Area has been considered as the facilities most likely to be impacted upon by the Development.
Nursing and residential homes and older persons accommodation	The Study Area	Provision within the Study Area has been considered in order to assess whether the Development could assist in providing complementary additional provision in the scheme mix.
Open space	The Study Area	Provision within the Study Area has been considered as the facilities most likely to be impacted upon by the Development.

ii) Methodology for individual community facilities

a) Early Years Education

3.4 All registered early years/childcare providers in non-domestic settings located within the Study Area have been sourced from Medway Council and Ofsted, including details of the number places provided.

3.5 To estimate the number of early years children generated by the Development, pupil yield data (PPRs) for nursery education specific to Medway Council (the Local Education Authority in which the development is located) are applied to the Development's proposed housing provision. Table 3.2 details the nursery PPRs. Early years yields from the Development have



been derived through application of the PPRs to the total number of units proposed by the Development; no account has been taken of the phased construction of the Development's units. For the purposes of this assessment, it is assumed that the development will solely comprise houses (rather than flats).

Table 3.2: Nursery PPRs (number of children per dwelling)

Education Stage	Flats	Houses	All
Nursery	0.04	0.08	0.06

Source: Department of Education: Pupil Yield Data Dashboard Medway 2021/22

- 3.6 Assessment is quantitative based on the demand for early year places generated by the Development versus the number of places within the existing early years/childcare provision.

b) GP provision

- 3.7 All GP provision (practices and any associated branches) located within the Study Area have been selected for this assessment. Baseline conditions for GP provision are assessed through reference to the National Health Service (NHS) GP Workforce Statistics¹, which provide total patient list size for individual GP Practices and the number of full time equivalent (FTE) GPs at each practice. It should be noted that the NHS only publishes GP and Patient data at a practice level. Data is not published for individual branches.
- 3.8 To determine whether existing GP provision is under or over-capacity, GP to patient ratios of selected practices have been compared to the Healthy Urban Development Unit (HUDU) and confirmed by the government² standard of 1 GP for every 1,800 people. Reference has also been made to the NHS Choices website (as of 04 July 2024) to establish whether each of the GP practices are currently accepting new patient registrations.
- 3.9 The assessment of likely effects has been quantitatively based on the number of future residents anticipated to live in the Development versus the number of surplus or deficit patient places within the selected GP provision. To assess the worst-case, it has been assumed that all residents of the Development will be new to the area and therefore not already registered with a local GP.
- 3.10 The number of future residents anticipated to live in the Development has been calculated using the average household size, for Medway from the 2021 Census of 2.47, totalling **1,729** people.

¹ NHS Digital, GP Workforce Statistics as of February 2024.

² Homes England Guidance Fact Sheet 4: New Homes and Healthcare facilities, 2nd November 2023 [Fact Sheet 4: New homes and healthcare facilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/fact-sheet-4-new-homes-and-healthcare-facilities)

**c) Dentists**

- 3.11 Dental practice provision has been identified within 2km of The Development. Data has been gathered by the National Health Service (NHS) Dentist Workforce Statistics, which allows access to the NHS and Private dental practices across England. It is, however, not possible to determine the precise number of patient places available as no central census of dentists is conducted and no definitive ratio of patients per dentist exists. Therefore, the NHS website has been used to ascertain if each practice is accepting new patients.

d) Libraries

- 3.12 Library provision within the Study Area has been sourced from Medway Council³ and GoogleMaps⁴.

e) Community Halls

- 3.13 All community halls within the Study Area have been identified and sourced from Medway Council⁵ and GoogleMaps⁶.

f) Nursing and residential homes and older persons accommodation

- 3.14 This Assessment will draw on accommodation data from the Elderly Accommodation Counsel and assess provision against benchmark provision rates per 1,000 age 75+.

g) Open Spaces

- 3.15 Open space data has been obtained from the OS (Ordnance Survey) Open Green Space GIS layers, and Google Maps, using a 2km buffer.

iii) Determining the significance of effects

- 3.16 There are no published assessment guidance and technical significance criteria to assess the effects on community facilities. The significance of effects is therefore undertaken using professional experience and judgement, having regard to the existing baseline position.
- 3.17 Effects have been determined as either adverse or beneficial. Where little or no effect is anticipated, this has been determined as negligible. Where an adverse effect is identified, appropriate mitigation measures have been identified to provide a negligible to beneficial effect.

³ Medway Find a Library: [Find a library | Medway Council](#)

⁴ As of July 2024

⁵ Medway Council: [Find a hall for hire | Medway Council](#)

⁶ As of July 2024



4.0 EXISTING COMMUNITY FACILITIES

4.1 This Section presents the community facilities that exist in the Study Area currently, therefore providing the baseline from which the assessment of effects is measured.

i) Early Years Childcare

4.2 A total of 15 registered non-domestic childcare and early years facilities are located within the Study Area as shown on Figure 3.1. These 15 facilities are detailed in Table 3.1, along with the number of places provided.

Table 4.1: Existing Childcare and Early Years facilities within the Study Area

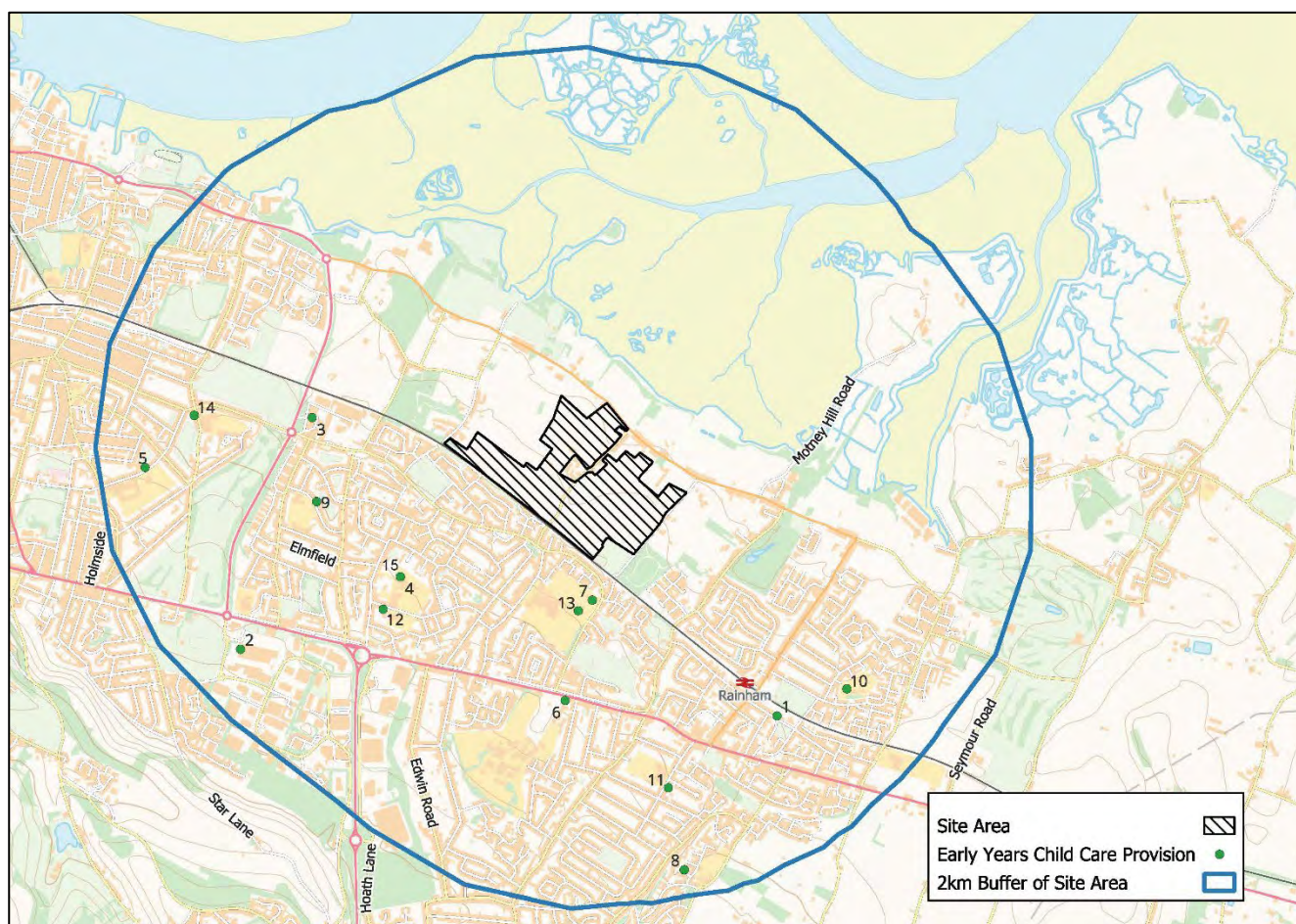
Location on Figure 3.1	Name	Total Number of Places
1	Busy Bees Day Nursery at Rainham	81
2	1 st Friends Day Nursery and Creche Ltd	24
3	Busy Bees Day Nursery at Gillingham	112
4	JAKS Nursery at Gillingham	28
5	Kiddiwinks Pre-School	39
6	Scallywags (Medway) Limited	104
7	Sunshine Thames View Pre-School and Out of School Club	50
8	Rainbow Pre-School and Out of School Club	30
9	Featherby Infant School and Nursery School	N/A Undersubscribed
10	Riverside Primary School & Nursery	Oversubscribed
11	St Margarets Infant School	N/A Undersubscribed
12	St Thomas of Canterbury Catholic Primary School	N/A Undersubscribed
13	Thames View Primary School	Oversubscribed
14	The Academy of Woodlands	N/A Undersubscribed
15	Twydall Primary School	Oversubscribed
Total		468

Source: Ofsted and Medway Council Website

4.3 The 15 registered non-domestic childcare and early year facilities collectively offer 468 places. The closest childcare and early years facility to the Site is Sunshine Thames View Pre-School and Out of School Club. The total number of places available at primary schools in the area is not listed on Ofsted as shown in the table above. However, the Medway Council website provides data on total applications and total offers for September 2023, enabling the council to determine if a school is oversubscribed.

- 4.4 The Medway Council Childcare Sufficiency Assessment Report 2023-24⁷ outlines that the total number of full-time equivalent registered childcare places offered across Medway is 6,092. The number of full-time equivalent places currently required is 5,930, meaning there is full sufficiency projected until September 2024.
- 4.5 Providers who have managed to sustain high occupancy rates are those who regularly review the service they offer to parents and provide flexibility to meet the needs of their families. There has also been a steady increase in the number of providers.

Figure 4.1: Existing Early Years Childcare Provision



ii) GP Provision

- 4.6 There are 7 GP practices, and 1 branch operating from within the Study Area. Figure 4.2. illustrates the location of GP provision in relation to the Site and Table 4.2 provides details of the GP provision including the number of registered patients and the number of FTE GPs as of February 2024.

⁷ Medway Council Childcare Sufficiency Assessment Report 2023-2024

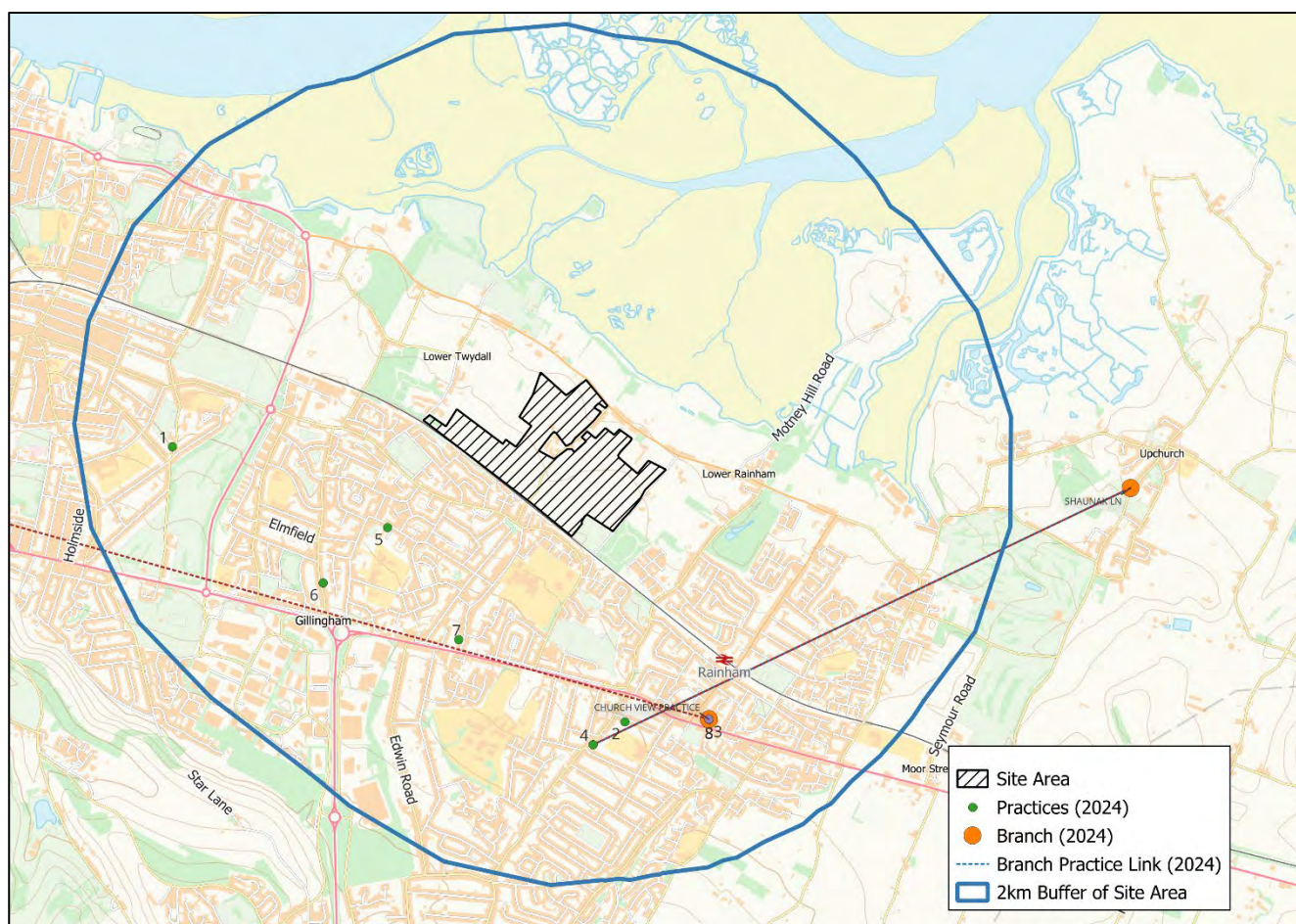
Table 4.2: Existing GP Provision and Capacities (February 2024)

Location on Figure 3.2	Surgery Name	GPs (FTE)	Patients	Ratio (Patients to 1 GP)	Surplus capacity/deficit (patients) ¹
1	Woodlands Family Practice	13.4	20,435	1:1,523	+3,685
2	Thames Ave Surgery	2	5,924	1:2,962	-2,324
3	Orchard Family Practice	1.9	5,083	1:2,723	-1,663
4	Maidstone Road Rainham Surgery	1.6	4,814	1:2,935	-1,934
4.1	Shaunak Lane Branch (Outside of buffer)				
5	Waltham Road Medical Centre	1	1,401	1:1,401	+399
6	Eastcourt Lane Survey	1.1	2,240	1:2,024	-260
7	Pump Lane Surgery	1	2,172	1:2,115	-372
8	Maritime Health Partnership (outside of buffer)	11.6	36,272	1:3,121	-15,392
8.1	Church View Practice (Branch in Study Area)				
8.2	The Pentagon Surgery (outside of buffer)				
8.3	St Marys Medical Centre (outside of buffer)				
8.4	St Marys Island Surgery (outside of buffer)				

Source: NHS GP Workforce Statistics as of February, 2024.

Note: Capacity is calculated by subtracting the existing ratio (patients to 1 GP figure) from the HUDU average (1 GP for every 1,800 people) and multiplying this by the number of GPs at the relevant surgery.

- 4.7 Two of the GP practices within the buffer selected for assessment are currently operating with spare capacity when compared to the national benchmark of 1 GP for every 1,800 patients. Table 4.2 indicates that there is currently capacity to accommodate additional patients within the two practices combined. However, the remaining practices accommodate a significant number of patients, surpassing the 1:1,800 ratio, and indicating a wider level of under provision in the area.

Figure 4.2: Existing GP Provision**iii) Dentists**

4.8 There are six dentists located within the Study Area as illustrated on Figure 4.3 and detailed in Table 4.3. Two of these are accepting NHS patients, with the other 3 only accepting NHS patients for special dental care by referral. Omnipark Dental Practice is the closest NHS dentist to the Site and is currently taking on new NHS patients, including adults aged 18 or over, adulted entitled to free dental care, children aged 17 or under (as of 15 May 2024).⁸

Table 4.3: Existing Dentists (July, 2024)

Location on Figure 3.5	Dentist Name	Postcode	Accepting New Patients	
			NHS	Private
1	Simon Collins Community Dental Service	ME8 0NJ	Yes*	Yes
2	Maidstone Road Dental Clinic	ME8 0DH	Yes	Yes
3	The Rainham Dental Surgery	ME8 7HX	Yes*	Yes
4	MJS Patel & Associates	ME8 6JU	N/A	N/A

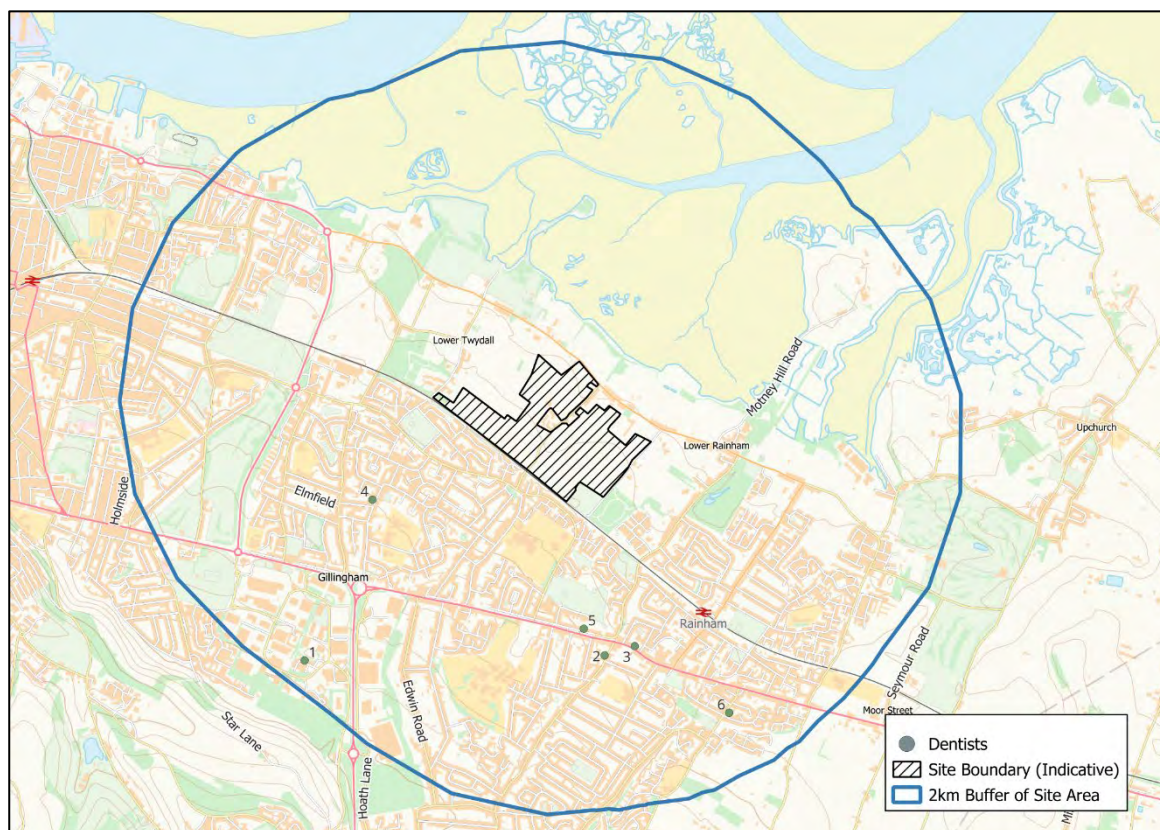
⁸ [Omnipark Dental Practice - NHS \(www.nhs.uk\)](https://www.nhs.uk)

5	Omnipark Dental Practice	ME8 7HB	Yes	Yes
6	Portman Healthcare Limited	ME8 6JU	Yes*	Yes

Note: * For special dental care by referral.

MJS Patel & Associates have not given updated information for the NHS system.

Figure 4.3: Existing Dental Provision within the Study Area.



iv) Libraries

4.9 There are two libraries located within the Study Area as illustrated on Figure 4.4 and detailed in Table 3.4. Rainham Library is the closest to the Site and is open to the public from Monday – Tuesday and Thursday - Saturday. In addition, Rainham library also hosts various free baby and toddler groups.

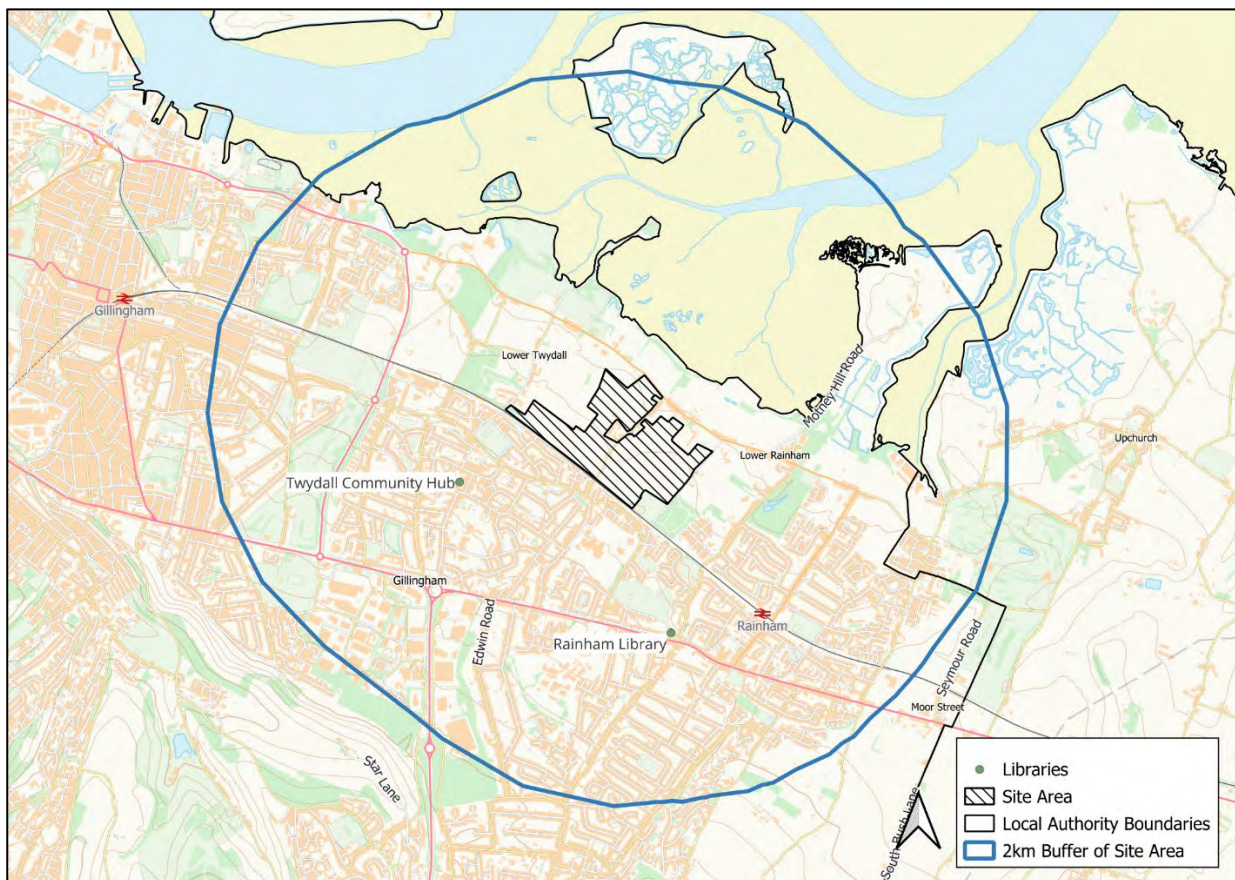
Table 4.4: Existing Library provision

Name	Approximate size (sqm) *
Rainham Library	364
Twydall Library, Community Hub	N/A

* Area estimated based on the property floor plan and does not consider any multiple floors

4.10 The Kent and Medway Growth and Infrastructure Framework (September 2015)⁹ states that Medway currently has a rate of 22 sqm Library space for every 1,000 people on average (p.60).

Figure 4.4: Existing Library Provision within the Study Area.



v) Community Halls

4.11 A total of six community centres/halls are located within the Study Area as illustrated on Figure 4.5 and detailed in Table 4.5. The community centres/halls are used by local groups for a range of different uses, including fitness classes.

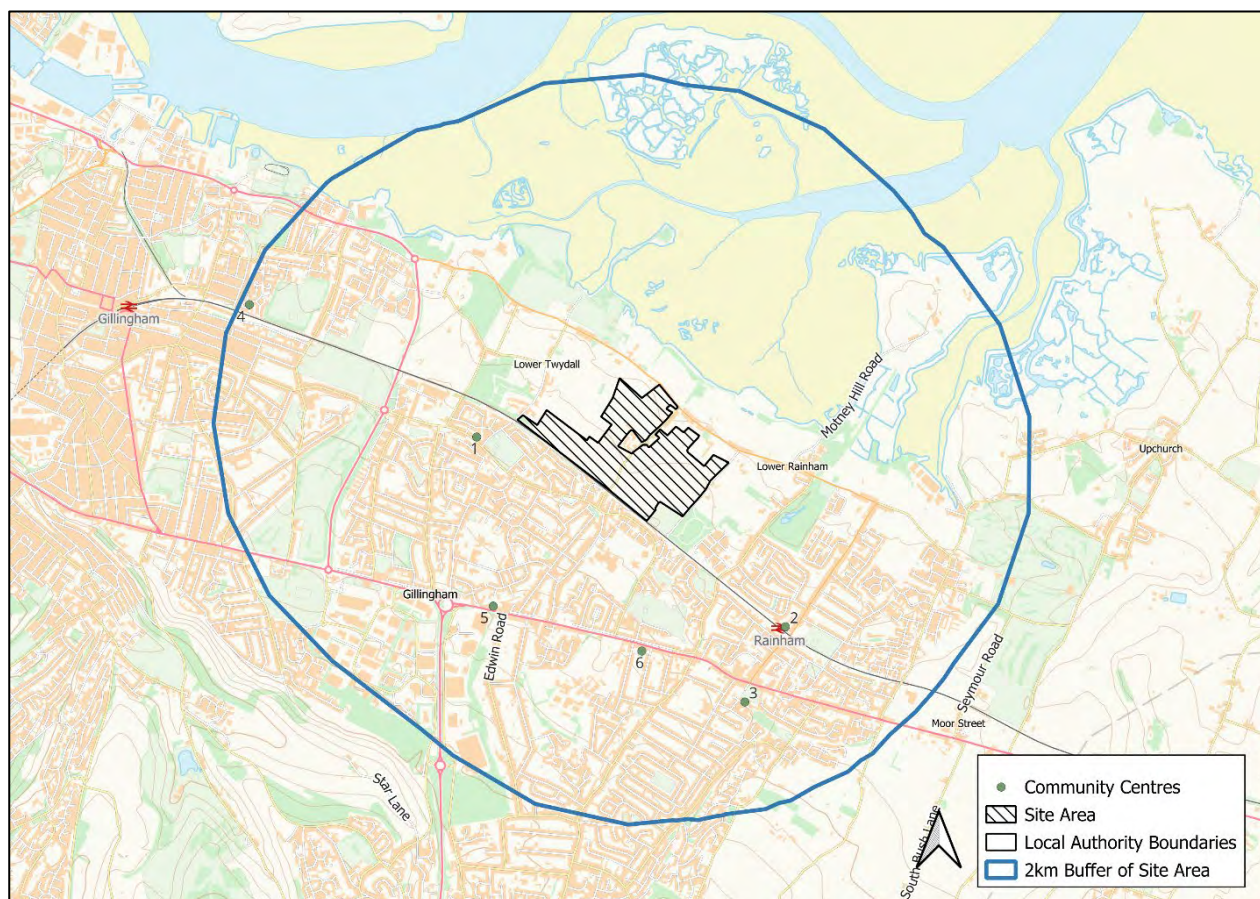
Table 4.5: Community halls/centres within the Study Area

Location on Figure 3.6	Name	Facilities
1	Twydall Community Centre	Room hire, indoor bootfairs, war games club, pole fitness, ariel twist fitness.
2	The Oast Rainham	Room hire, fitness groups, slimming world, Gillingham games club, dog training, chess club, yoga, dance club, toddler sense.
3	St Margarets Millennium Centre	Room hire, fitness groups, quiz nights, family friendly coffee mornings.

⁹ Kent and Medway Growth and Infrastructure Framework – September 2015 [Growth-and-Infrastructure-Framework-GIF.pdf](https://www.kent.gov.uk/growth-and-infrastructure-framework-gif.pdf) ([kent.gov.uk](https://www.kent.gov.uk))

4	Moat Foundation Community Hub	Function room hire, financial wellbeing drop ins, half term activities for young people, careers advice.
5	Rainham Mark Social Club	Function room hire, quiz nights, live music.
6	Rainham Parish Centre	100 people seated venue capacity room hire, Parish Youth, Mothers Union.

Figure 4.5: Existing Community Halls/Centres within the Study Area



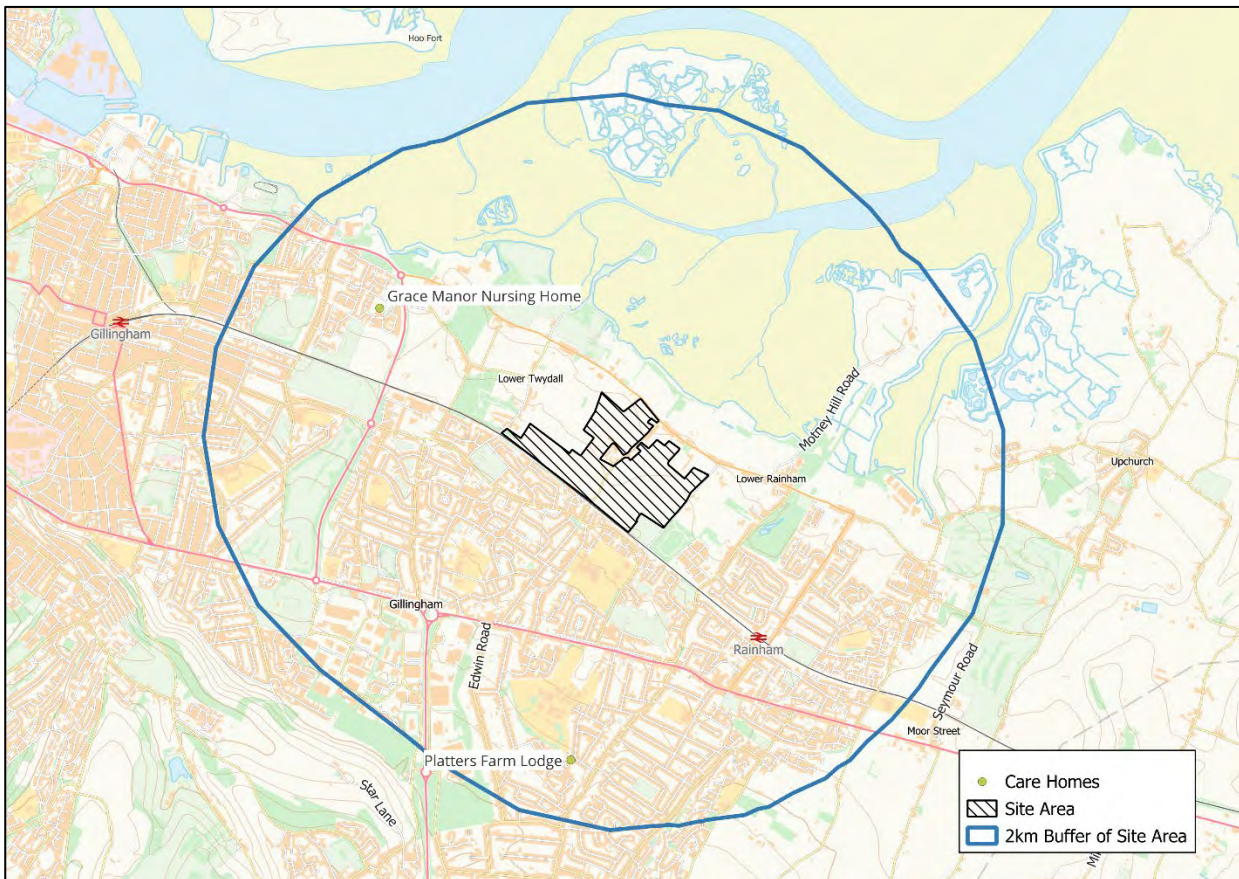
vi) Older Persons Accommodation

4.12 As shown in Figure 2.3, the 65+ population of the Study Area experienced a 25% increase over the 10-year period to 2021. Looking ahead, population projections for the period from 2021 to 2041 indicate that Medway's population of those aged 65 and over will grow by 12,229, representing a further 26.6% increase. It is reasonable to assume that the Study Area will experience a similar rate of increase.

4.13 There are a total of two care homes located within the study area as illustrated on Figure 4.6 and detailed in Table 4.6.

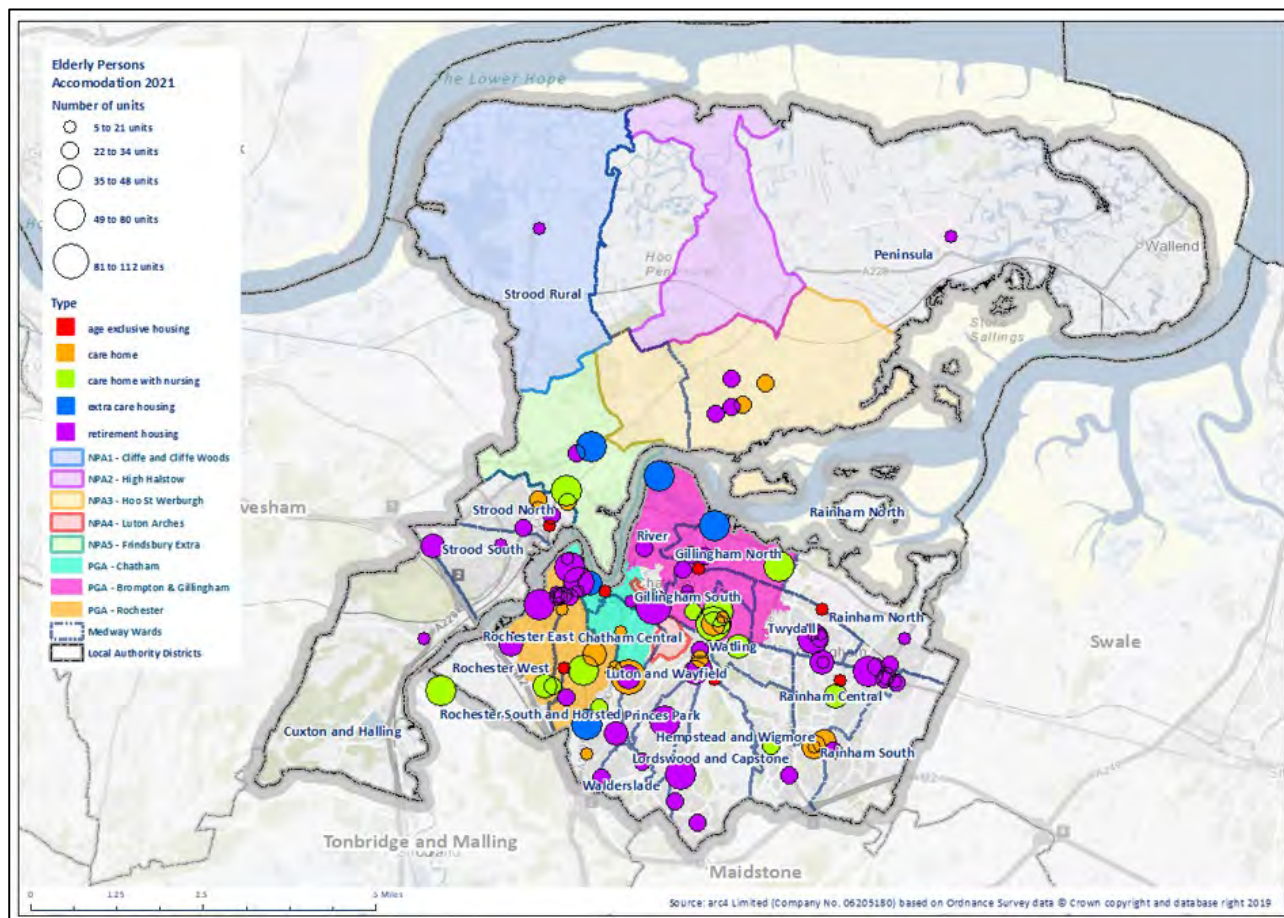
Table 4.6 Care homes within the Study Area

Home Name	Beds Care	Beds Nursing	Total Beds
Grace Manor Nursing Home (private)	0	60	60
Platters Farm Lodge (voluntary)	43	0	43

Figure 4.6 Existing Care Homes within Study Area.

- 4.14 In respect of older persons accommodation, the Council's Local Housing Need Assessment (2021) summarise current supply and future needs.
- 4.15 The following map summarises the provision across Medway as sourced by the report authors from the Elderly Accommodation Counsel (EAC).

Figure 4.7 Older Persons Accommodation Across Medway (Extract from Council Housing Need Evidence 2021)



Source: Medway Local Housing Needs Assessment 2021, Map 5.1 Current Older Persons Accommodation Across Medway

4.16 The following map provides a clearer view of care homes (residential and nursing) in the surrounding area based on current EAC data. The nearest care home to the site is located on Grange Road to the west (Grace Manor Nursing Home).

Figure 4.8 Care Home Provision – EAC 2024

Source: Marrons/ EAC

- 4.17 The Local Housing Needs Assessment calculated a need for 753 additional specialist older persons units over the period to 2037, and a further 436 residential care beds across Medway.
- 4.18 However, it is also clear that the Council's assessment simply applies the existing rate of provision relative to the 75+ population, to the projected population in 2037. This approach fails to account for any current under provision, and bakes that under provision into the future forecast. The table below shows that residential care provision stands at a rate of 5.8% of the 75+ population, whereas benchmark rates of provision for nursing and residential care stand at around 9-10% (More Choice Greater Voice – 2008, and subsequent Housing LIN reviews). This would suggest that current care home under provision is substantial, amounting to some 700 beds.
- 4.19 Furthermore, the equivalent analysis for housing with support and housing with care shows, where the benchmark rate of provision should be in the order of at least 16% (reported in the table below as 10%), demonstrates a current under provision in the region of 1,600 units.

Figure 4.9 Analysis of Future Need Specialist Older Person Accommodation (Table Extract from Local Housing Needs Assessment 2021)

Table 5.4 Analysis of future need for specialist older person accommodation 2021-2037				
Current provision (and planning use class)	Number of units 2021	Number aged 75 and over 2021	Number aged 75 and over 2037(projected)	Change in need
		20,428	27,897	
		Ratio of population to current provision	Ratio applied to 2037 population	
Specialist older person (C3)	2,060	0.10084	2,813	753
Residential Care (C2)	1,193	0.05840	1,629	436
Total	3,253		4,442	1,189

Source: EAC data, 2018-based population projections

- 4.20 On the basis of the above analysis the need for care homes and specialist older persons housing within Medway is severe.

vii) Open Space and Outdoor Formal Sports

- 4.21 There are several open spaces within the study area as seen in figure 4.11, including two large parks. Including Cozenton park to the southeast and Riverside Country Park to the north.
- 4.22 Two golf courses are also located within the 2km boundary which is Upchurch golf course to the east and Gillingham Golf course to the west.
- 4.23 Medway Council is currently working to regenerate green spaces in the district to protect and sustain the existing open areas¹⁰.
- 4.24 Medway Council commissioned 4global consulting to provides Playing Pitch Strategy (October 2019)¹¹. This provides a holistic analysis of outdoor sports facilities which helps facilitate future development.
- 4.25 This report concluded that the area has high-quality cricket pitches in Rainham; however, there is an offset of 15.7 in grass wicket provision projected by 2035 (p.32). This also correlates with a projected future deficit of -40 for women and girls' cricket in Rainham. Regarding football, there is an estimated 19% increase in teams from 2019-2033, with future demand for 3G AGPs calculated at 0.19, indicating a need for a small-sided AGP. However, there is a shortage of grass playing pitches in Rainham, potentially leading to unmet demand across Medway. In Rainham, the future shortfall is -2.0, implying a need for additional grass pitches.

¹⁰ Medway Council Greenspace regeneration projects: [Greenspace regeneration projects | Medway Council](#)

¹¹ Medway Council Playing Pitch strategy - Strategy and Action Plan
[Medway PPS Strategy and Action Plan Final .pdf](#)

4.26 This report is supported by research conducted in the Kent and Medway Growth and Infrastructure Framework (GIF) (Kent Country Council, AECOM) September 2015. This found there is a large deficit in community and sports facilities in Medway as shown in figure 4.10 below:

Figure 4.10 Community and Sports Capacity in Kent and Medway.

Table 4.10 Kent & Medway
Community / Sports capacity

	SPORTS HALL COURTS	SWIMMING POOL LINES	SQUASH COURTS	GYM STATIONS	INDOOR BOWLS RINKS
Ashford	57	25	6	712	6
Canterbury	101	34	14	918	8
Dartford	49	15	5	637	6
Dover	53	15	10	595	4
Gravesham	66	14	7	403	0
Maidstone	63	31	8	1,044	8
Sevenoaks	58	47	18	326	16
Shepway	43	17	10	702	7
Swale	58	24	10	573	6
Thanet	67	25	8	543	8
Tonbridge & Malling	66	31	12	825	6
Tunbridge Wells	83	42	19	589	6
KENT	764	320	127	7,867	81
Medway	117	44	12	1,388	14
KENT & MEDWAY	881	364	139	9,255	95

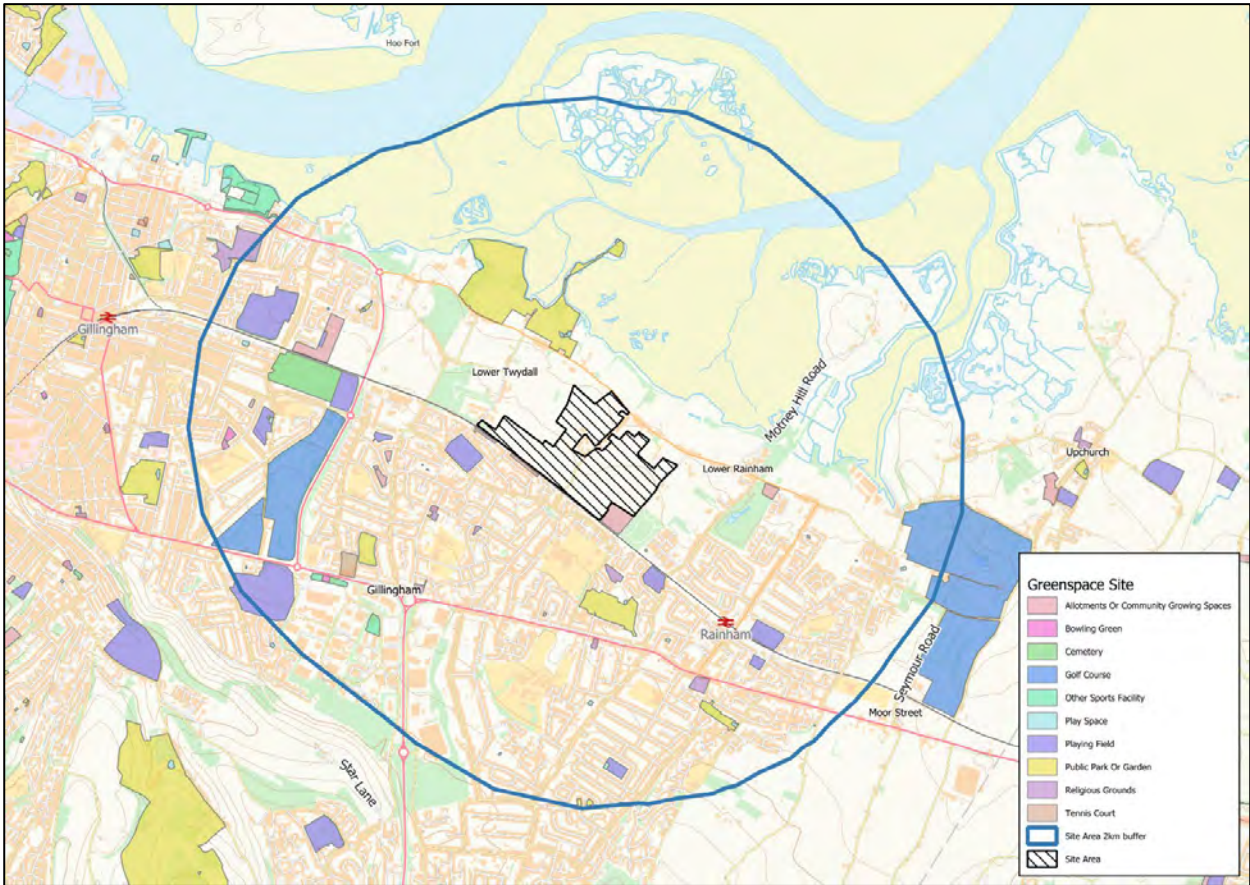
SOURCE: SPORTEINGLAND FACILITY DATABASE

SHADING INDICATES WHETHER SUPPLY IS ABOVE OR BELOW KENT & MEDWAY AVERAGE SUPPLY TO POPULATION RATIO.

Source: the Kent and Medway Growth and Infrastructure Framework (GIF) (Kent Country Council, AECOM) September 2015 (p.64)



Figure 4.11 Existing open space provision in Study Area.





5.0 REVIEW OF LOCAL EVIDENCE

- 5.1 Medway Council is currently in the process of developing a new local plan (Medway 2041) which will replace the 2003 Medway Local Plan.
- 5.2 Various local authority evidence base reports, including supplementary planning guidance (SPG) and supplementary planning documents (SPDs), have been reviewed throughout the report to identify key issues in Medway and Rainham.

Medway Local Plan (2003)

- 5.3 Policy S1 of the Local Plan (Adopted May 2003)¹² states that *“the development plan for the area is to prioritise re-investment in the urban fabric. This will include the redevelopment and recycling of under-used and derelict land within the urban area, with a focus the Medway riverside areas and Chatham, Gillingham, Strood, Rochester and Rainham town centres.”* (p.12)

Medway Council Local Plan (Draft) 2012-2035¹³

- 5.4 Section 10 of Draft Local Plan (2012-2035) focuses on infrastructure across Medway. It is stated that in the Education Policy approach for Early Years and School Provision (p.82) that:

“The Council supports consideration of opportunities for co-location of community services and shared use facilities on school sites that offer a range of facilities wider than the educational function. Educational facilities shall be encouraged to diversify to provide a wider range of services to benefit the whole community, such as sports facilities or community centres open to the public.”

- 5.5 The plan outlines the importance of community facilities to bring people together, build cohesive and healthy communities, and help to create attractive places to live. They provide a focus for community life and are integral to sustainable development.” (p.83)
- 5.6 Section 9 of the Draft Local Plan Health and Communities makes further reference to the strain on GPs in the area mentioning there are a high number of GP practices where the number of patients per GP is above national average. (p.76)

Statement of Medway Report Infrastructure January (2012)

- 5.7 This report outlines Medway's status as of 2012, establishing a baseline for further work and identifying infrastructure gaps.

¹² Medway Council Local Plan 2003. (adopted 14th May 2003)

¹³ Medway Council Local Plan Draft (reg 18) Section 10 [Document downloads - Planning | Medway Council](#)



- 5.8 Paragraph 10.5 references the 1800:1 GP ratio, noting that at the time of publication, the number of GPs per patients in Medway was above the national average. Therefore, this implies that GP shortages have been an issue in the district for some time. The council attributes this mainly to an estimated 20,000 additional people who live outside of Medway but are registered with a GP in Medway.
- 5.9 The report states that there is no evidence to suggest an under-provision of dental services in Medway as found by Medway PCT and NHS Direct. (p.56).

Medway Urban Community Facilities Survey Report (2018)

- 5.10 Medway's Urban Community Facilities Survey Report (2018) the importance of community facilities within urban areas as outlined "Community facilities make an important contribution to the quality of life of a neighbourhood and can be an invaluable asset to a settlement, providing a venue for a range of social activities. Therefore, protecting, improving and making provision for new community facilities will help to maintain and improve the quality of life enjoyed by Medway's residents" (p.2).
- 5.11 The report details the council's efforts to improve and manage community facilities by identifying suitable community buildings across the urban area and conducting a survey to gather local residents' feedback. The survey revealed a high demand for community facilities and a high level of current usage in the sampled area (p.5).

Medway Council prepared a Development Strategy outlines the Vision and Strategic Objectives – Developing a vision for 2035

- 5.12 This was consulted on between 16th march and 25th June 2019 – states that "Planned growth will have delivered a city that its residents have pride in, providing homes for all sectors of the community, supported by infrastructure to deliver education, transport, health and community services. Vibrant and complementary town, local and village centres will provide a focus for community life" (p.19).

Kent and Medway Growth and Infrastructure Framework (GIF) (Kent Country Council, AECOM) September 2015

- 5.13 The GIF aims to bring together a clear image of the housing and economic growth planned from 2014-2031 across Kent and Medway along with the fundamental infrastructure needed to support this growth.
- 5.14 The report indicates that Medway Libraries provide an average of 22 square meters of library space for every 1,000 residents. This is the second highest amount of usable floorspace per 1,000 population in the entire Kent region (p.60).



- 5.15 The report summarises that one of the main capacity issues in Medway is the shortage of GPs needed to support the current and projected population growth.

Medway's Joint Local Health and Wellbeing Strategy 2024-2028

- 5.16 Medway's Joint Local Health and Wellbeing Strategy 2024-2028¹⁴ sets out four priority themes aimed at improving the physical and mental health and wellbeing of Medway residents reducing inequalities.
- 5.17 Priority theme 1, 'Healthier & Longer Lives for everyone' emphasizes the goal for older people to live with dignity and stay independent for as long as possible.
- 5.18 Priority theme 2, 'Reducing Poverty and Inequality' focuses on ensuring that people and families can access affordable and good quality homes.
- 5.19 Priority theme 3, 'Safe, Connected and Sustainable Places' highlights that services should be close to where people live and accessible by active transport. It also states that green spaces should be accessible by all.
- 5.20 Priority Theme 4, 'Connected Communities and Cohesive Services' focuses on ensuring people feel connected to their community, fostering a sense of belonging and strong support networks.

¹⁴ Medway's Joint Local Health and Wellbeing Strategy 2024-2028:
[Joint Local Health and Wellbeing Strategy 2024 to 2028.pdf](#)



6.0 ASSESSMENT OF LIKELY EFFECTS ON COMMUNITY FACILITIES

6.1 This Section establishes the likely effects of the Development on each of the identified community facilities, having regard to the baseline conditions presented in Section 3 and professional judgement. Where an adverse effect is identified, suitable mitigation strategies are proposed to ensure a negligible to beneficial effect.

i. Effects on Early Years Education

- 6.2 The Development will provide 700 residential units. At the current time, the mix of dwellings has not been confirmed.
- 6.3 However, the population is calculated to be likely around 1,729 people based upon the average household size in Medway in 2021 (ONS Census).
- 6.4 Applying the MC PPRs for early years education set out earlier in the report in Table 3.2 to the proposed number of homes, it is calculated that the Development will yield a need for 46 early years places.
- 6.5 Baseline conditions identified a total of 15 registered, non-domestic childcare and early years facilities within the Study, which combined provide a total of **468** places. However, there is currently no updated information available regarding the occupancy status of these spaces, only the total number of places as reported by Ofsted.
- 6.6 The Council's Childcare Sufficiency Assessment¹⁵ confirms that that they have a statutory duty to ensure that there is a sufficient childcare to meet the needs of resident families.
- 6.7 The assessment outlines that the total number of full-time equivalent registered childcare places offered across Medway is 6,092. The number of full-time equivalent places currently required is 5,930 meaning there is full sufficiency projected until September 2024.
- 6.8 However, the introduction of the new 9 -23 months entitlement from September 2024 will impact supply with a shortfall of 426 FTE places across Medway when using expected government take up rates. Each provider would need to create a further 3 FTE places across Medway to meet expected take-up.
- 6.9 As a result, for the purposes of this assessment it is assumed that there is no spare capacity within the existing early years provision surrounding the Site
- 6.10 A new day nursery may help assist the wider shortfall in the area and will be a benefit to the local community.

¹⁵ Medway Council Childcare Sufficiency Assessment Report 2023-2024



ii. Effects on Dentists

- 6.11 Baseline conditions identified a total of 6 dentists within the Study, of which 5 were NHS and one was unknown. However, two are accepting new NHS patients, with the other 3 only accepting NHS patients for special dental care by referral.
- 6.12 As outlined previously it is calculated that the development will yield a total population of approximately 1,729 people as shown in table 4.7 below. As a worst-case scenario, it is assumed that all 1,729 people will therefore be registering with a new local dentist.
- 6.13 It is considered that the Development will not have adverse effect on dental provision at the local level.

iii. Effects on GP Provision

- 6.14 As outlined earlier in this report, to assess a worst-case, it is assumed that all 1,729 people residing in the Development will be new to the area and therefore will need to register with a local GP. On this basis, the Development is expected to create a need for 1,729 additional GP places and therefore would require an additional 1 FTE GP based upon a GP to patient ratio of 1:1,800).
- 6.15 Baseline conditions identified that there are only two GP practices within the Study Area, which are currently operating under-capacity. Combined the two GP practices have capacity to accommodate an additional 4,084 patients.
- 6.16 However, the wider area is under served as shown in the table 4.2. There is presently a deficit of 9.9 FTE GPs required to adequately serve the existing 17,861 patients in the listed within practices situated within the 2km study area.
- 6.17 On the basis that the Development will be generating a need for more places than currently available in the existing GP provision within the Study Area, it is considered that the Development will have an adverse effect on GP provision at the local level. For which, mitigation will be required which is capable of supporting approximately 1 additional GP.
- 6.18 An example of the necessary level of floorspace required to support an additional GP can be found in the East Herts Infrastructure Delivery Plan (noting that Medway and neighbouring authorities do not provide an equivalent floorspace calculation). The East Herts Infrastructure Delivery Plan¹⁶ outlines the capacity planning calculation using general medical services (GMS) provision. This calculation aims to determine the necessary contribution to facilitate new GP provision corresponding to the development.
- 6.19 By utilising the calculation of 1 GP multiplied by 199 sq m results in a requirement of approximately 199 sq m of additional general medical services floorspace to serve the proposed

¹⁶ East Herts Council: Infrastructure Delivery Plan. 2017 as set out in the NHS England 'Premises Principles of Best Practice, Part 1 Procurement & Development)



development. However, it should be noted that this may not be of a sufficient size to provide a viable practice offer. Mitigation should therefore be discussed with the local Clinical Commissioning Group (CCG) to understand whether the appropriate mitigation would be delivery of a new healthcare facility on-site or whether a financial contribution towards off-site provision would be more suitable.

iv. Effects on Libraries

- 6.20 Baseline conditions identified that there are currently two static libraries located within the Study Area, providing approximately 364 sq m of library provision to support the expected development population of 1,729.
- 6.21 Whilst no local evidence is given on floor base assumptions for community facilities including libraries information has been drawn from the East Herts Councils Infrastructure delivery plan (2017) which notes an infrastructure requirement for community facilities to be 0.117m²/capita. Adhering to this specification entails a requirement of approximately 306 square metres of community facilities, encompassing amenities such as village halls, leisure centres, libraries and religious buildings.
- 6.22 Discussions should take place with MC to determine whether the Development's need for library provision would best be met through the delivery of a new library on-site, or whether a financial contribution towards off-site provision would be more suitable. This could however be provided in the form of a micro library, forming part of community centre provision, which will help to bring people together, building a cohesive and healthy community.

v. Effects on Community Halls

- 6.23 Baseline conditions identified that there are six community halls located within the Study Area that provide a space for community groups and clubs. However, it is assumed that the existing community halls are primarily intended to serve the local communities they are located within.
- 6.24 This is further supported by paragraph 97 of the National Planning Policy Framework (NPPF)¹⁷ which states:

“plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.”

- 6.25 Without the provision of any new community floorspace, it is considered that the Development will have an adverse effect on community halls at the local level. However, with some form of new provision, it is considered that the effect will be negligible.

¹⁷ MHCLG (December 2023) National Planning Policy Framework

**vi. Older persons homes**

- 6.26 Baseline conditions revealed there are a total of two care homes located within the study area as illustrated on Figure 4.6 and detailed in Table 4.6.
- 6.27 As mentioned, the Local Housing Needs Assessment calculated a need for 753 additional specialist older persons units over the period to 2037, and a further 436 residential care beds across Medway.
- 6.28 Therefore, suggesting that the need for care homes and specialist older persons housing within Medway is severe.

vii. Open Space

- 6.29 As outlines earlier in the report there is sufficient need for increased outdoor sports facilities across Medway and Rainham.
- 6.30 Whilst there is no set floorspace equivalent given by the council, there is currently a regeneration project underway.
- 6.31 Therefore, Mitigation should therefore be discussed with MC to understand whether the appropriate mitigation would be delivery of a new sports facility on-site or whether a financial contribution towards off-site provision would be more suitable.

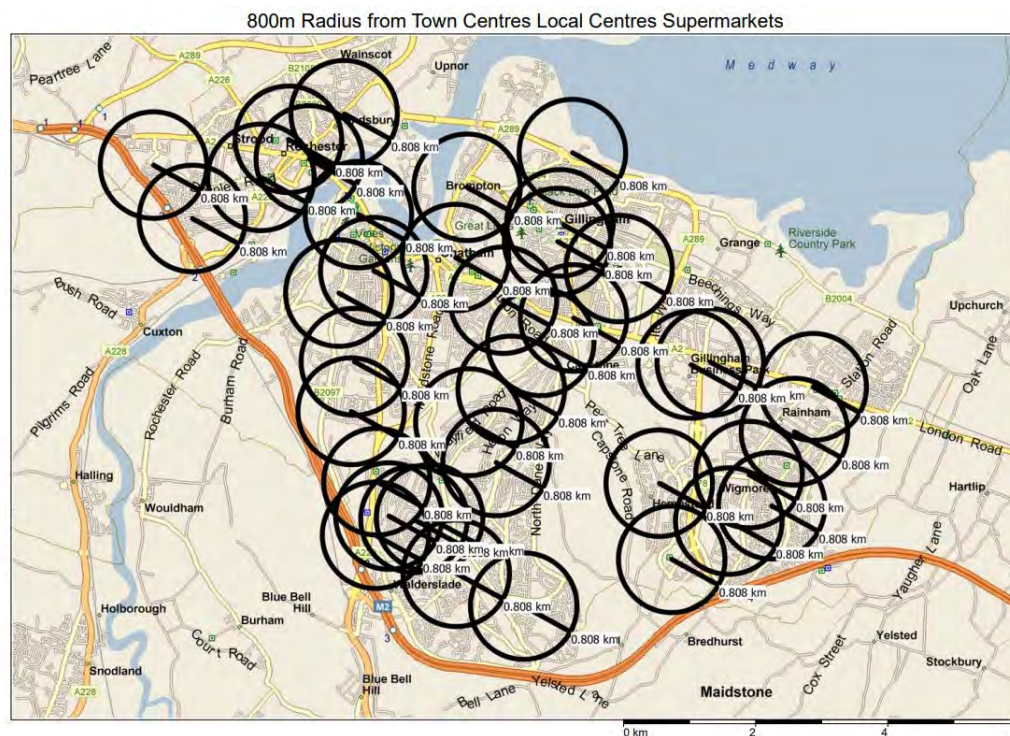
viii. Retail Capacity Assessment

- 6.32 The Council's retail evidence is now dated, largely comprising the North Kent Retail and Leisure Assessment 2015. This concludes there to be overarching capacity for both comparison (non-food) and convenience (food) based retail floorspace across Medway. A separate Medway Retail and Leisure Study was published in 2018, albeit with a limited focus.
- 6.33 Any retail provision to be provided within the Proposed Development is likely to be small scale in nature and will likely form part of a local centre provision with the intention of meeting day to day needs.
- 6.34 The following map displays the location of existing retail foodstores surrounding the site.

Figure 6.1 Convenience goods stores surrounding Proposed Site

Source: Geolytix, 2024

6.35 The Council's 2018 Study also includes a map depicting an 800m radius around each local centre and supermarket, with a clear gap surrounding the Proposed Site.

Figure 6.1 800m radius around existing local centres and supermarkets.

Source: Medway Retail and Leisure Study Part2, March 2018



- 6.36 There would be a clear benefit in providing small scale retail provision on-site to meet local needs.
- 6.37 We undertake a high-level review of the quantum of retail floorspace which could be supported on-site from the new residents of the development (1,729 people).
- 6.38 Whilst dated, the Council's 2015 Retail and Leisure Study confirms that expenditure per head within the immediate area of the Proposed Site totals £2,063 in convenience goods and £4,126 in comparison goods.
- 6.39 Total expenditure from new residents therefore equates to £3.6m in convenience goods and £7.1m in comparison goods.
- 6.40 If it is assumed that up to 25% of convenience goods expenditure (representing top-up food shopping) and 10% of comparison goods expenditure were retained through a local retail offer, this would equate to £0.7m and £0.7m respectively in convenience and comparison goods turnover.
- 6.41 Application of a sales density of c.£5,000 sq m in both convenience and comparison goods retail sectors (representative of that typically achieved by retailers in local centres) to the turnover figures referred to above, equates to a convenience goods floorspace of 180 sq m and comparison goods floorspace of 180 sq m gross (after allowing for a net to gross ratio of 75%).
- 6.42 On this basis it is reasonable to assume that there is sufficient expenditure generated by new residents of the Proposed Development to accommodate a low level of retail provision, which could be supported by other non-retail provision typically associated with local centres, such as dentists, medical centre, cafes etc.



7.0 SUMMARY OF FINDINGS

- 7.1 This Assessment has been prepared to understand the likely effects of the Development on community facilities, namely, early years education, GP provision, dentists, libraries, community halls, older persons living, open space and retail.
- 7.2 The assessment has been undertaken within the context of existing provision and new demand arising from the Development.
- 7.3 Table 7.1 summarises the likely effects on each community facility and any necessary mitigation measures.

Table 7.1: Summary of Effects

Facility	Significance of effect	Justification	Mitigation
Early Years Education	Beneficial	Need for 46 spaces in the area.	New provision required, ideally on-site. Potentially as part of a multi-use community centre.
GP Provision	Adverse	Need for 1,729 approx. patients cannot be accommodated within the existing GP provision despite some surplus capacity currently.	New provision required 1 GP and CCG to advise whether this demand is best met through on-site or off-site provision.
Dentist Provision	Negligible	It is concluded that the development will not have adverse effects on dentist provision in the area. As surrounding dentists in the area are continuing to accept new NHS patients.	N/A
Library Provision	Beneficial	Currently there are two libraries in the Study Area.	Additional provision is recommended as part of a multi-use community centre to include a library.
Community Halls	Beneficial	Whilst there are six community halls in the Study Area, these are primarily serving the communities they are located within.	New provision recommended on-site for a multi-use community centre.
Older Persons Accommodation	Beneficial	Whilst the development will not place an increase burden on care home provision, there is significant need for older persons accommodation due to under provision in the	New provision is required in the area given the severity of the lack of beds.



		region of 436-700 beds across Medway.	
Open Space	Beneficial	There is a need in the area for cricket and football playing pitches, both outdoor and 3G AGPs.	There is a new requirement for a small-sided AGP, but this should be balanced with the council's efforts to regenerate open space in the area.
Retail	Beneficial	The existing lack of surrounding retail provision, and size of proposed development support a small-scale local retail offer.	There is quantitative justification to provide for convenience of approximately 180 sq m gross, and a similar quantum of comparison goods floorspace – essentially 2-4 small shop units, which could complement some non-retail local centre provision

APPENDIX 1: MEDWAY GROWTH AND INFRASTRUCTURE OVERVIEW

5.7 MEDWAY

22,100
new homes
(+20%)

42,600
new people
(+18%)

20,100
new jobs
(+20%)

(2011 to 2031)

EXISTING CAPACITY ISSUES

- Congestion issues on the A289 and A228
- Congestion issues on the A2 corridor
- Limited existing primary and secondary school capacity in urban areas, although net surplus across the local authority area when rural schools are considered.
- Deficit in number of GPs required to support existing and proposed population across Medway
- Uncertainty over future needs and plans of Medway Maritime Hospital
- Need for strategic ecological mitigation to enable and support housing growth
- Flood risk issues for Medway

Total Infrastructure Costs: **£626,750,000**

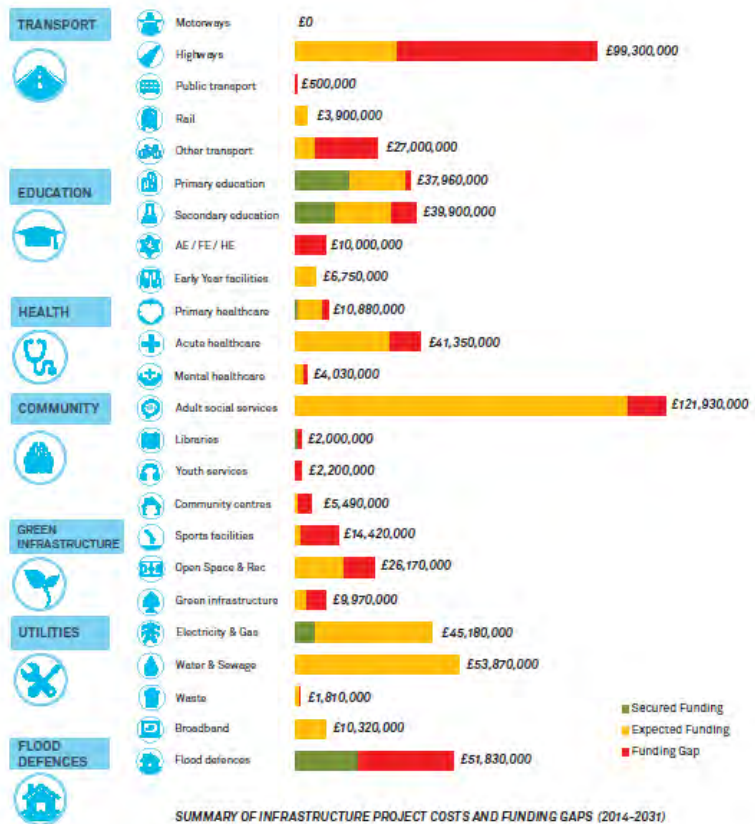
Total Secured Funding: **£61,510,000**

Total Expected Funding: **£368,930,000**

Total Funding Gap: **£196,320,000**

% of Infrastructure Funded: **69%**
(2014 to 2031)

94 | Kent County Council | Growth and Infrastructure Framework



SUMMARY OF INFRASTRUCTURE PROJECT COSTS AND FUNDING GAPS (2014-2031)

Source: Kent and Medway Growth and Infrastructure Framework (GIF) (Kent County Council, AECOM) September 2015 (p.94)

Appendix F

Highways Technical Note (Pell Frischman, September 2024)

Pell Frischmann

Rainham Parkside Village

Local Plan Transport Representations

August 2024

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Ref. reference. Rev revision. Suit suitability.

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Executive Summary	
Site Name	Rainham Parkside Village
Location	Medway, Kent
Summary	<p>Pell Frischmann has been commissioned by Esquire Developments (the 'client') to provide transport and highways consultancy services in relation to the Rainham Parkside Village site in Lower Rainham, Kent (the 'site').</p> <p>This report has been prepared to inform the Local Plan consultation process and provides an access and highway feasibility review for the proposed development of the site for allocation in the emerging Medway Local Plan 2041. A Regulation 18 consultation is currently taking place, ending on 8th September 2024. The draft Local Plan will be published in 2025.</p> <p>An outline planning application (planning application ref: MC/19/1566) was submitted to Medway Council (MC) on 28th June 2019 for up to 1,250 dwellings, a local centre, a village green, a two-form (2FE) entry primary school, a 60-bed extra care facility, an 80-bed care home and associated access (vehicular, pedestrian, cycle). The planning application was refused by MC in June 2020 and a subsequent appeal was dismissed in November 2021 based on the view that the scheme would result in a severe cumulative impact on traffic levels at key junctions in the local area and on the free flow of traffic on the local highway network.</p> <p>The quantum of development that is now being proposed for allocation is up to 800 residential units, a school, local centre, care home and open space. It is evident from the review of the 2019 planning application submission, post-submission and Inquiry documents that assessment of the traffic impact of development on this site will need to be based on a MC strategic model such as the Medway Aimsum Model (MAM). Given the approximate 36% reduction in the number of dwellings proposed from that which was applied for in the 2019 application, the reduction in the number of vehicle trips generated by the development is likely to be significant. As a result, the associated impact on the local highway network will also be reduced compared to the 2019 scheme.</p> <p>Of notable relevance to determining suitability of the proposed development is MC's position, at the appeal for the previous site application, where they acknowledged that <i>"it could be possible to reduce the impact of the development on the road network so as not to be severe if additional mitigation were to be secured"</i>. Given this comment was made based on the previous scheme, and the reduced quantum of development now being proposed, it is considered that development of the site will be feasible. This is particularly true when taking into account the current development proposed and the focus on encouraging travel by sustainable / active travel modes.</p> <p>The consultation draft of the NPPF, 31st July 2024, places a particular focus on the vision and validate approach and that a severe impact should only apply if this is met in all tested scenarios. Whilst the changes to the NPPF have not yet been adopted, it provides a focus on how it is expected new developments should be assessed. It would appear therefore that the currently proposed scheme is likely to meet this test.</p> <p>The site access arrangements proposed for all modes as part of the 2019 planning application submission were accepted by MC. However, in order to maximise the accessibility to and within the site by walking, wheeling, cycling, public transport and shared travel, the internal layout will need to be designed to prioritise movement by these modes over cars. As such, the internal street layouts and active travel routes will be designed to accommodate this, and to provide connections to routes off-site to facilitate access to facilities and destinations in the wider area by sustainable modes. This will involve engagement with both the Landscape and Highways teams at MC during the planning process to agree on suitable arrangements that will help to achieve the vision of having active and sustainable travel at the core of the development.</p> <p>Esquire Developments will also seek to engage further with Arriva and MC to discuss the details and requirements for the proposals to extend an existing bus service to route through the site, which Arriva have confirmed they are supportive of.</p> <p>A review of existing walking and cycling routes has shown that the site can be easily integrated into the local pedestrian / cycling network offering the opportunity for sustainable travel around the local area. Esquire Developments will also seek to investigate potential improvements that could be made to existing routes off-site in order to enhance active travel links and connectivity in the area.</p> <p>It is also evident that the site is located in proximity to multiple existing amenities, including schools, GP surgeries, transport services, shops and leisure facilities including open space / country parks.</p>
Conclusion	<p>The outcomes of this report indicate that development of the Rainham Parkside Village site is deliverable, viable and can be achieved in alignment with National (both existing and consultation versions) and Local Policy. Therefore, it is considered that the site is appropriate for allocation in the emerging Medway Local Plan.</p>

1. Introduction

1.1. Overview

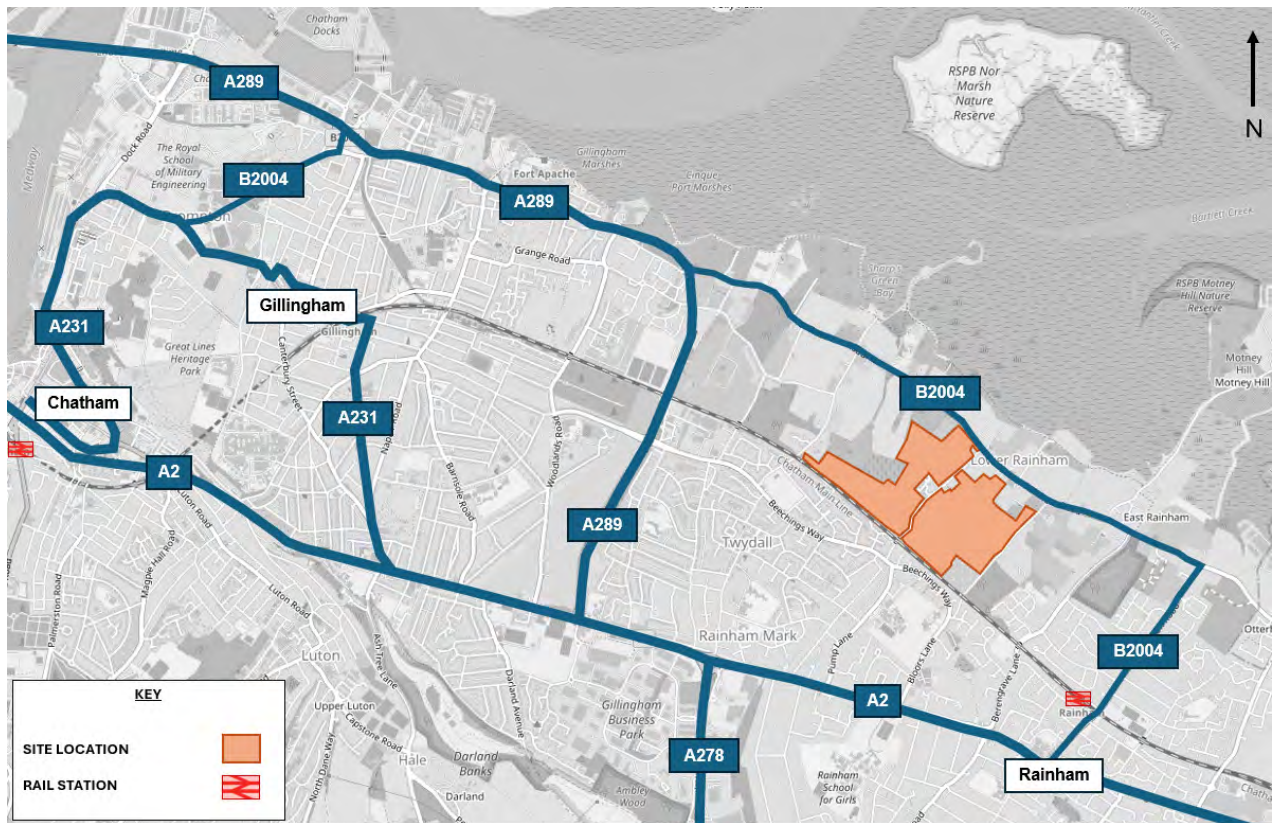
- 1.1.1. Pell Frischmann has been commissioned by Esquire Developments (the 'client') to provide transport and highways consultancy services in relation to the Rainham Parkside Village site in Lower Rainham, Kent (the 'site').
- 1.1.2. The Local Planning Authority (LPA) and Local Highway Authority (LHA) is Medway Council (MC), a unitary authority responsible for the borough of Medway and separate from the surrounding Kent County Council area.
- 1.1.3. This report has been prepared to inform the Local Plan consultation process and provides an access and highway feasibility review for the proposed development of the site for allocation in the emerging Medway Local Plan 2041. A Regulation 18 consultation is currently taking place, ending on 8th September 2024. The draft Local Plan will be published in 2025.
- 1.1.4. An outline planning application (planning application ref: MC/19/1566) was submitted to MC on 28th June 2019 for the redevelopment of land at Pump Lane, Lower Rainham. The application sought outline planning permission for up to 1,250 dwellings, a local centre, a village green, a two-form (2FE) entry primary school, a 60-bed extra care facility, an 80-bed care home and associated access (vehicular, pedestrian, cycle). Scale, layout, landscape and appearance were all reserved matters.
- 1.1.5. The planning application was refused by MC on 12th June 2020. The reasons for refusal are set out in the Decision Notice dated 12th June 2020, of which there were 9 in total, 5 of which related to transport and highway matters. However, it should be noted that of the 5 reasons for refusal relating to transport and highway matters, only one was pursued by MC at appeal which was as follows:

"5 The cumulative impact from the increased additional traffic cannot be accommodated on the highway in terms of overall network capacity without a severe impact. This is contrary to Local Plan policy T1 and the NPPF at paragraph 109."
- 1.1.6. The subsequent appeal was dismissed on the balance of a number of issues, including that *"the appeal scheme would result in a severe cumulative impact on traffic levels at key junctions in the local area and on the free flow of traffic on the local highway network"*. This was agreed with by the Secretary of State in his dismissal on 3rd November 2021.
- 1.1.7. The quantum of development that is now being proposed for allocation is up to 800 residential units, a school, local centre, care home and open space. This is a notable reduction to what was previously proposed and ultimately refused at planning appeal by the Planning Inspectorate (PINS).
- 1.1.8. The reduced scale of development proposed for the site will help to reduce the level of impact on the highway network, and the promotion of sustainable and active travel modes as part of the development will also help with this.
- 1.1.9. Given the approximate 36% reduction in the number of dwellings proposed from that which was applied for in the 2019 application, the reduction in the number of vehicle trips generated by the development is likely to be significant. As a result, the associated impact on the local highway network will also be reduced compared to the 2019 scheme.

1.2. Site Location

- 1.2.1. The site is located on land at Pump Farm and Bloors Farm in Lower Rainham. The site sits within a broad corridor between the B2004 Lower Rainham Road and the Chatham Main Line railway line.
- 1.2.2. The site location in the context of the wider highway network is shown in **Figure 1.1**.

Figure 1.1: Site Location and wider highway network



Source: © OpenStreetMap contributors with Pell Frischmann annotations

1.3. Report Structure

1.3.1. The remainder of this report is structured as follows:

- Chapter 2 – reviews national and local policy;
- Chapter 3 – summarises the local highway context, addresses the issue of accessibility by non-car modes;
- Chapter 4 – sets out matters that were agreed under the unsuccessful planning application and appeal for development of the site;
- Chapter 5 – outlines the potential development proposals for the site including access arrangements;
- Chapter 6 – provides a review of the trip generation proposed in the original planning application and appeal, and includes a new trip generation appraisal to account for the development proposed;
- Chapter 7 – compares the proposed trip generation with that identified in the original planning application and appeal, and summarises the reduced impact on the respective junctions previously assessed;
- Chapter 8 – identifies the proposed transport and highways mitigation strategy for the potential development; and
- Chapter 9 – provides a summary of the report.

2. Policy Review

2.1. National Policy

National Planning Policy Framework

2.1.1. The Government's National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these should be applied. The current version of the NPPF was adopted in February 2019, revised in July 2021 and last updated in December 2023.

2.1.2. It applies overarching high-level policy for local authorities to use when developing their own local and neighbourhood plans. This approach allows the planning system to be customised to reflect the needs and priorities of individual communities.

2.1.3. At the heart of the NPPF is a presumption in favour of sustainable development, and the NPPF notes that:

"the purpose of the planning system is to contribute to the achievement of sustainable development". At a very high level, the objective of sustainable development can be summarised as "meeting the needs of the present without compromising the ability of future generations to meet their own needs".

2.1.4. Chapter 9 of the NPPF relates to the promotion of sustainable development. Paragraph 108 states that:

"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- *the potential impacts of development on transport networks can be addressed;*
- *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; opportunities to promote walking, cycling and public transport use are identified and pursued;*
- *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places."*

2.1.5. Paragraph 114 states that:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- *safe and suitable access to the site can be achieved for all users;*
- *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*

2.1.6. Paragraph 115 notes that:

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

2.1.7. Within this context, paragraph 116 states that:

"applications for development should:

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

2.1.8. The current NPPF does not explicitly require a defined transport vision for development, but requires an approach which itself is a vision for a shift towards sustainable and active travel; e.g. by ensuring that developments “*should give priority first to pedestrian and cycle movements [... and ... facilitate] access to high quality public transport*” [paragraph 116].

Proposed Reforms to National Planning Policy Framework

2.1.9. In Summer 2024, the new government started consulting on revisions to the NPPF which much more explicitly put vision-led development at the heart of NPPF policy.

2.1.10. The wording is yet to be adopted but the concept of a ‘vision-led approach’ is proposed to be embedded specifically in the document. For example, paragraph 114 is proposed to be updated to change “*appropriate opportunities to promote sustainable transport*” to “*A vision-led approach to promoting sustainable transport*”. Similarly, it is now proposed that “*significant transport impacts must now be mitigated to an acceptable degree through a vision-led approach.*”.

National Planning Practice Guide (NPPG)

2.1.11. The planning guidance that supports the delivery of the NPPF includes guidance to help inform the preparation of a Transport Assessment (TA), Travel Plan (TP) and Transport Statement (TS).

- The NPPG on TA’s, TP’s and TS’s includes advice on:
- When TA’s, TP’s and TS’s are required;
- How the scope of the plans and assessments should be defined; and
- What should be included within the documents.

2.1.12. Within Chapter 2, Travel Plans, the document gives more details about Travel Plans and the need for and scope of them. Paragraph 010 states that:

“the anticipated need for a Travel Plan should be established early on, preferably in the pre-application stage but otherwise within the application determination process itself.”

2.1.13. Paragraph 011 states that:

“Travel Plans should set explicit outcomes rather than just identify processes to be followed (such as encouraging active travel or supporting the use of low emission vehicles). [...] These active measures may assist in creating new capacity within the local network that can be utilised to accommodate the residual trip demand of the site(s) under consideration.”

2.1.14. Within chapter 3, Transport Assessments and Statements, the guidance emphasises that:

“The need for, scale, scope and level of detail required of a Transport Assessment or Statement should be established as early in the development management process as possible as this may therefore positively influence the overall nature or the detailed design of the development.”

2.1.15. The document also states that:

"It is important to give appropriate consideration to the cumulative impacts arising from other committed development (i.e. development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years)."

2.1.16. The guidance outlines suggested content for Transport Assessments, including the following:

- *"information about the proposed development, site layout, (particularly proposed transport access and layout across all modes of transport);*
- *information about neighbouring uses, amenity and character, existing functional classification of the nearby road network;*
- *data about existing public transport provision, including provision/ frequency of services and proposed public transport changes;*
- *a qualitative and quantitative description of the travel characteristics of the proposed development, including movements across all modes of transport that would result from the development and in the vicinity of the site;*
- *an assessment of trips from all directly relevant committed development in the area (i.e. development that there is a reasonable degree of certainty will proceed within the next 3 years);*
- *data about current traffic flows on links and at junctions (including by different modes of transport and the volume and type of vehicles) within the study area and identification of critical links and junctions on the highways network;*
- *an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent 3-year period, or 5-year period if the proposed site has been identified as within a high accident area; and*
- *measures to improve the accessibility of the location (such as provision/enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms;"*

2.1.17. This document has been prepared giving consideration to those matters that would need to be considered within a Transport Assessment to support a planning application so as to provide confidence that a development of up to 800 dwellings and associated other land use could be delivered.

2.2. Local Policy and Guidance

Medway Local Plan 2003

2.2.1. The currently adopted Local Plan was formally adopted in May 2003, and replaced the Medway Towns Local Plan 1992 and the Medway Local Plan Deposit Version 1999. Chapter 8 Transportation sets out objectives and policy for the Council.

2.2.2. Section 8.2.1 states that:

"Medway is well located in relation to the strategic road and rail network of Kent. It has good road and rail links with central London, deep water (and other) port facilities and is within easy reach of Heathrow, Gatwick and Stansted Airports via the motorway network. The completion of the M20, and its widening north of Maidstone, have improved access to both the Channel Tunnel and the ports, with the M2/A2 providing an alternative route. The Channel Tunnel and Ashford International Station have improved freight and passenger access to continental Europe by rail".

2.2.3. Policy T1: Impact of Development, sets out that in assessing the highways impact of development, proposals will be permitted provided that:

- "(i) The highway network has adequate capacity to cater for the traffic which will be generated by the development, taking into account alternative modes to the private car; and*
- (ii) the development will not significantly add to the risk of road traffic accidents; and*
- (iii) the development will not generate significant H.G.V. movements on residential roads; and*

(iv) the development will not result in traffic movements at unsociable hours in residential roads that would be likely to cause loss of residential amenity.”

- 2.2.4. Policy T2: Access to the Highway, sets out that proposals which form new accesses, or result in an intensified use of an existing access will only be permissible where:

*“(i) the access is not detrimental to the safety of vehicle occupants, cyclists and pedestrians; or
(ii) can, alternatively, be improved to a standard acceptable to the council as Highway Authority”*

- 2.2.5. Policy T3: Provision for Pedestrians, confirms that developers should carefully analyse how proposed developments affect pedestrian movements. As part of the councils walking strategy, it will:

*“(i) identify the network of routes and locations (including the links between key uses such as schools, town centres and transport interchanges) where the needs and safety of pedestrians will be given priority, and the measures that will be taken to support this objective;
(ii) pay particular attention to the design, location and access arrangement of new development to help promote walking as a prime means of access;
(iii) promote high density, mixed use development in and around town centres and near to major transport interchanges;
(iv) promote and protect local day to day shops and services which are within easy walking distance of housing;
(v) create more direct, safe and secure walking routes, particularly in and around town centres and local neighbourhoods, and to schools and stations, to reduce the actual walking distance between land uses, and to public transport; and
(vi) ensure that the personal security concerns of pedestrians are addressed.*

- 2.2.6. Policy T4: Cycle Facilities, seeks to encourage and provide for cycling, not just as a means of transport but also for recreational activities. The policy confirms that the council is actively establishing a strategic network of cycling routes. The development of both these strategic routes and local cycling paths will be carried out through the Highways Programme and the development process. For major development proposals that attract significant traffic, provisions for cycle facilities related to the site are considered essential. These provisions may encompass connections to the Strategic Cycle Network, cycle priority measures, and the creation or enhancement of cycle routes aligned with cyclists' desired paths.

- 2.2.7. The council will actively seek secure cycle parking and associated amenities in line with the council's adopted cycle parking standards. These provisions will be particularly emphasized at public transport interchanges, buildings accessible to the general public (especially public institutions, leisure, educational, and health facilities), as well as in Chatham Town Centre, District Centres, and Local Centres.

- 2.2.8. Policy T6: Provision for Public Transport, suggests that new housing developments that are expected to generate substantial traffic should incorporate provisions for bus (or rail, or light rail where suitable) access and bus priority. This entails considering road layout, widths, geometry, design, and the requirement for adequate stopping and turning areas to accommodate modern full-size buses. The council aims to ensure that new housing areas provide comprehensive bus access, along with more straightforward and direct connections to nearby major roads for buses compared to those offered to private cars.

- 2.2.9. Policy T11: Development Funded Transport, identifies that where proposed development traffic would strain the existing transport network or pose safety concerns, the council will impose conditions to stop development until the necessary infrastructure improvements are in place. Additionally, the council is

prepared to enter legal agreements with developers to enhance the transport network, guided by Circular 1/97 “Planning Obligations” and policy S6. These agreements may involve advancing existing transport programs or contributing to facilities supporting cycling, walking, or public transport.

2.2.10. Policy T12: Traffic Management, confirms that in areas where high traffic volumes or perceived hazards significantly impede pedestrian or cyclist movement, and/or harm the broader environment, the Council will assess the necessity for traffic management and calming measures. This evaluation will involve consultation with local residents, businesses, emergency services, public transport operators, and other essential vehicular access stakeholders.

2.2.11. For newly developed road layouts, appropriate traffic management strategies must be incorporated to limit vehicle speeds and enhance safety for all road users. Special attention should be given to designing traffic management solutions that harmonize with their surroundings, particularly within Conservation Areas.

2.2.12. Policy T13: Vehicle Parking Standards, confirms that:

“Development proposals will be expected to make vehicle parking provision in accordance with the adopted standard.”

2.2.13. The adopted vehicle parking standards are considered later within this chapter.

2.2.14. Policy T14: Travel Plans, confirms that a Travel Plan will be required for all developments that require a Transport Assessment, including the following:

- “(i) all substantial developments comprising employment, retail, leisure and/or service floorspace;*
- (ii) smaller developments in category (i) which would generate additional traffic movements in or near to air quality management areas or other areas specifically targeted for a reduction in road traffic;*
- (iii) new or expanded educational facilities;*
- (iv) where a local traffic problem would otherwise lead to a refusal of planning permission.”*

New Medway Local Plan (2023-2041)

2.2.15. Medway are currently working on their new Local Plan, which sets out a vision for future development in Medway to ensure that the needs of the area are met through a number of policies and proposals. The plan will cover the period up to 2041 providing for the number of homes and jobs and supporting infrastructure such as transport, health facilities and parks that the area and its growing population need over time. The New Local Plan will replace the 2003 Local Plan.

2.2.16. The Council has previously undertaken four rounds of consultation at the Regulation 18 stage of the preparation process with the last of these consultations, in relation to the proposed vision and strategic objectives, having taken place in 2023.

2.2.17. The Council is undertaking an additional Regulation 18 consultation stage with this taking place in summer 2024, to be concluded in September 2024.

2.2.18. The milestones for the emerging plan are summarised as follows:

- Regulation 18 – Development Alternatives consultation throughout summer 2024;
- Regulation 19 – Publication of draft Local Plan in early 2025;
- Submission of Local Plan for Examination in summer 2025); and
- Adoption, determined on outcome of Examination seeking to have the plan in place by autumn 2026.

Medway Local Transport Plan (2011-2026)

2.2.19. The Medway Local Transport Plan (LTP) sets out the transport strategy for the 15 year plan period and embraces the wider aspirations for Medway to be a place of learning, culture and enterprise at the

heart of the Thames Gateway. The plan is one part of Medway Council's policy framework and is a statutory function of the council.

2.2.20. The plan states:

"There is a major challenge for the Medway area associated with the increased demand for travel that will arise from being within the Thames Gateway, a nationally designated regeneration area. Furthermore, there is now stronger recognition of how transport influences and adds value to many key priorities including economic growth, the natural environment, connectivity, equality of opportunity and health"

2.2.21. The LTP strategy aspires to implement transport interventions that align with five overarching focal points.

- *"Supporting Medway's regeneration, economic competitiveness and growth by securing a reliable and efficient local transport network;*
- *Supporting a healthier natural environment by contributing to tackling climate change and improving air quality;*
- *Ensuring Medway has good quality transport connections to key markets and major conurbations in Kent and London;*
- *Supporting equality of opportunity to employment, education, goods and services for all residents in Medway; and,*
- *Supporting a safer, healthier and more secure community in Medway by promoting active lifestyles and by reducing the risk of death, injury or ill health or being the victim of crime."*

2.2.22. The strategy provides a framework of actions to be delivered through five transport objectives. These are as follows:

- *"More efficient management of the highway network and car parks, together with highway improvements that focus on congestion and air quality hotspots, thereby improving the reliability and environmental impact of the transport network.*
- *Working in partnership both locally and sub-regionally to deliver step change improvements to encourage more people to use public transport. Outputs will focus on delivering better service quality, punctuality and information. Key actions will include the development of Fastrack style bus links, expansion of park and ride services and improvements to stations.*
- *Effective highway maintenance, including the Medway Tunnel. This is a vital highway asset that supports all the regeneration proposals in the area. There will be a need for further upgrades to the operating systems within the tunnel with the advancements in technology during the life of the plan.*
- *Encourage active travel by supporting students to access the learning quarter by sustainable travel modes, expanding the cycle network, improving accessibility to bus services for people with mobility difficulties, improving public rights of way and delivering the Green Grid and Coastal Access projects.*
- *Improve travel safety by road safety interventions, incorporating highway schemes, education, publicity, promotion and enforcement, safer routes to school projects and public safety initiatives."*

Medway Council Residential Parking Standards

2.2.23. A summary of residential parking standards is provided in **Table 2.1**.

Table 2.1: Medway Council Residential Parking Standards

Dwelling size	Minimum number of car parking spaces per dwelling	Minimum number of cycle parking spaces per dwelling
1 bedroom	1.0 ⁽¹⁾⁽²⁾	1.0 ⁽⁴⁾
2 bedrooms	1.5 ⁽¹⁾⁽²⁾	1.0 ⁽⁴⁾
3 bedrooms and above	2.0 ⁽¹⁾⁽²⁾	1.0 ⁽⁴⁾
Visitor parking	0.25 ⁽³⁾	0

(1) Reductions of the standard will be considered if the development is within an urban area that has good links to sustainable transport and where day-to-day facilities are within easy walking distance.

(2) Excludes garage if less than 7m x 3m internal dimension.

(3) Applies to a minimum threshold of 4 residential units. Requirement for provision is rounded down, i.e. 5 to 7 units require 1 visitor space, 8 to 11 units require 2 spaces, etc. Visitor or unallocated vehicle parking can, subject to appropriate design, be located on or near the road frontage.

(4) Not required if garage or secure area is provided within curtilage of dwelling.

- 2.2.24. The residential parking guidance makes no reference to electric vehicle parking provision. However, national guidance is provided within The Buildings Regulations document “Approved document S”.
- 2.2.25. Approved Document S was updated on 15th December 2021 to enforce a minimum number of electric vehicle charging points in new development. The requirements are as follows:
- “(1) A new residential building with associated parking must have access to electric vehicle charge points as provided for in paragraph (2).*
- (2) The number of associated parking spaces which have access to electric vehicle charge points must be —*
- (a) the total number of associated parking spaces, where there are fewer associated parking spaces than there are dwellings contained in the residential building; or*
- (b) the number of associated parking spaces that is equal to the total number of dwellings contained in the residential building, where there are the same number of associated parking spaces as, or more associated parking spaces than, there are dwellings.*
- (3) Cable routes for electric vehicle charge points must be installed in any associated parking spaces which do not, in accordance with paragraph (2), have an electric vehicle charge point where—*
- (a) a new residential building has more than 10 associated parking spaces; and*
- (b) there are more associated parking spaces than there are dwellings contained in the residential building.”*
- 2.2.26. In addition to Approved Document S the Medway Air Quality Planning Practice guidance provides, at Appendix 4, further insight into the technical specifications / requirements for electric vehicle charging infrastructure in domestic and commercial installations.

Medway Council Non-Residential Parking Standards

- 2.2.27. Medway’s Local Transport Plan aims to reduce car travel and encourage cycling, walking and use of public transport. The adopted vehicle parking standards are designed to help achieve this by limiting the number of parking spaces in new developments and therefore the guidance is for maximum parking provision.
- 2.2.28. The Medway Council Parking Standards provide guidance for land uses classes other than C3 residential dwellings, with these being addressed separately.
- 2.2.29. A summary of non-residential parking standards relevant to the proposed development is provided in **Table 2.2**.

Table 2.2: Medway Council Non-Residential Parking Standards

Land use category	Parking standards			Threshold for transport assessment
	Maximum no. of car parking spaces	Minimum no. of commercial vehicle parking spaces	Minimum no. cycle parking spaces	
A1 Retail				
Food retail including cold food take-away	One per 18m ² GFA	One per 500m ² GFA	One per 250m ² GFA for staff and customers ⁽⁶⁾	1000m ²
Non food retail warehouses	One per 20m ² GFA	One per 500m ² GFA	One per 250m ² GFA for staff and customers ⁽⁶⁾	1000m ²
D1 Non-residential institutions				
Schools (non-residential) – primary and secondary	One per member of staff plus drop off area ⁽⁹⁾	Space for deliveries off the public highway required	To be determined on individual merits	Over 500 trips per day
Creches / playschools or nurseries – includes day nursery and day centre	One per two staff members plus one per four children for parents	Nil	To be determined on individual merits	Over 500 trips per day
Clinics	Four per consulting / treatment room plus one per member of staff	Nil	To be determined on individual merits	Over 500 trips per day

(6) Cycle parking for GFA below threshold to be determined on individual merits.

(9) Space should be provided for the setting down and picking up of children away from the highway.

2.2.30. In addition to the parking requirements identified above parking for people with disability must also be provided. The minimum parking standards for disabled spaces is identified in **Table 2.3**.

Table 2.3: Medway Council Non-Residential Disabled Parking Standards

Minimum numbers of parking spaces for motorists with a disability		
Land use category	Car park size	
	Up to 200 spaces	Over 200 spaces
Business premises - employees	One for each registered disabled employee	One for each registered disabled employee
Business premises – visitors	Two or 5% of the maximum parking standard (whichever is greater)	Six or 2% of the maximum parking standard (whichever is greater)
Shopping and recreation	Three or 6% of the maximum parking standards (whichever is greater)	Four or 4% of the maximum parking standard (whichever is greater)

Medway Rights of Way Improvements Plan 2020 – 2030 (2020)

2.2.31. The Medway Rights of Way Improvement Plan 2020-2030 was adopted in May 2020 and outlines the authorities' strategic goals and priorities for enhancing public rights of way (PRoW) in Medway over the next decade. The key themes of the plan are as follows:

- Theme 1 – A well-maintained network: This theme focuses on ensuring that the existing network of public rights of way is kept in good condition through regular maintenance, repairs whilst also acknowledging that improvements will enhance accessibility and safety for all users.
- Theme 2 – An evolving network: The plan recognises that the needs of users change over time and therefore this theme emphasises adaptability and growth, seeking the identification and provision of new routes to meet the requirements of Medway's residents and visitors.

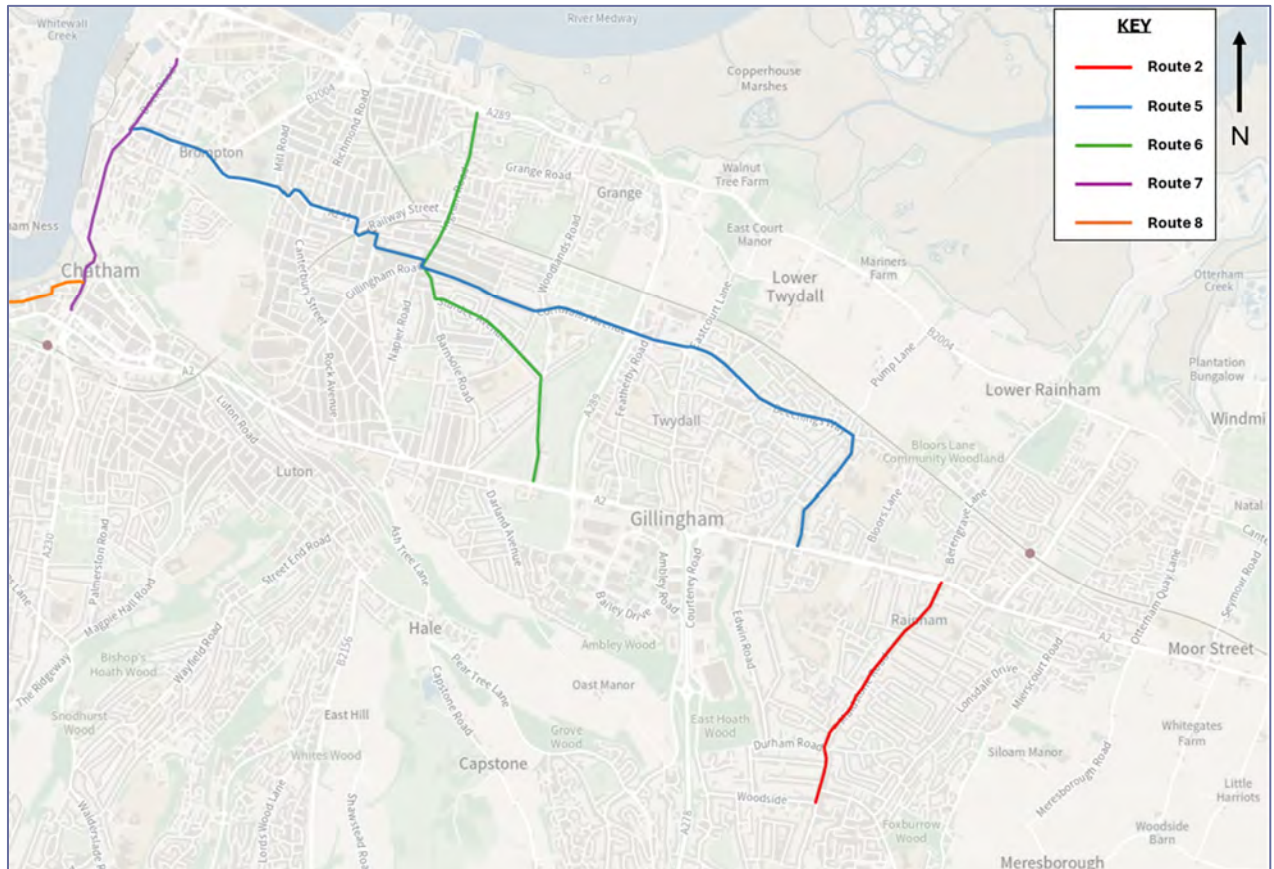
- Theme 3 – Serving Medway’s needs: This theme confirms that public rights of way should align with the community’s needs and aims to identify and prioritise routes that connect to essential destinations such as shopping areas, schools, transport hubs, and leisure facilities.
- Theme 4 – Effective delivery: This theme focuses on efficient delivery of the plan confirming that appropriate funding, collaborative working, and community engagement will ensure that proposed improvements are effectively delivered for the benefit of all.

- 2.2.32. The plan identifies that Medway is expected to see the construction of approximately 28,000 new homes by 2031 and recognises that the anticipated housing growth will impact upon PRoW, with certain developments creating new urban/countryside interfaces as well as altering existing networks. It acknowledges that new development offers opportunities to enhance accessibility and emphasises that ensuring good access within, and connecting to, new developments is crucial for promoting healthy lifestyles, delivering walking and cycling routes, and enhancing the overall quality of life.
- 2.2.33. The plan encourages developers to view rights of way as assets rather than constraints and confirms that early in the application process, the council expects identification of high-quality access arrangements that cater to a diverse range of users and support active travel. These will be evaluated by how well access proposals align with existing public rights of way, accessible green spaces, footways, and cycleways. The council also expects developers to minimise direct impact and disruption to PRoW access during construction by limiting closures and offering alternative routes where feasible.
- 2.2.34. It is the aspiration of the council to enhance the significance of PRoW by facilitating both strategic routes and paths for short walks and cycling trips, identifying those routes that connect to shopping districts, town or village centres, public transportation hubs, schools, green areas, and other recreational facilities.

Medway Local Cycling and Walking Infrastructure Plan Consultation Report

- 2.2.35. The development of the new Medway Local Cycling and Walking Infrastructure Plan (LCWIP) will contribute to MC’s efforts in relation to the climate emergency and the future regeneration of Medway. It provides a strategy to develop a much-improved cycling and walking network for our communities now and over the long term.
- 2.2.36. An LCWIP details the work needed in the short, medium and long term to provide a safer, more attractive network for people to walk and cycle on their shorter journeys. LCWIPs are Active Travel England and the Department for Transport’s (DfT) preferred approach for identifying and in turn delivering walking and cycling improvements. LCWIPs take a holistic approach to network planning and provide a clear, long term framework for local authorities to deliver on their ambitions around active travel.
- 2.2.37. The LCWIP will help support the new Local Plan, Medway Local Transport Plan (2011-2026) and Climate Action Plan.
- 2.2.38. The LCWIP Consultation Report identifies 10 priority cycling routes. Those located within the vicinity of the site are shown in **Figure 2.1**.

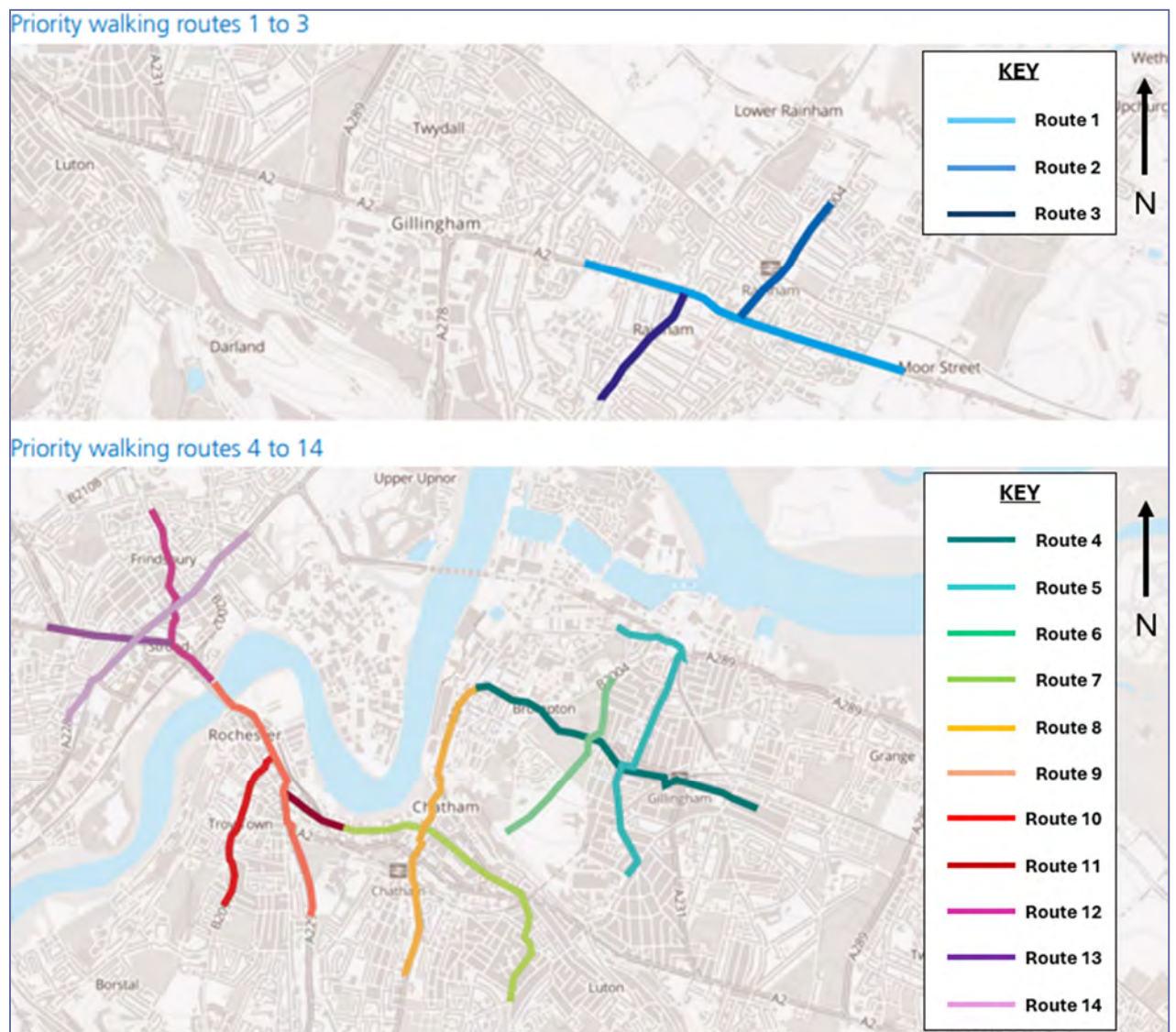
Figure 2.1: Emerging LCWIP priority cycle routes in vicinity of site



Source: Medway.gov.uk with Pell Frischmann annotations

2.2.39. The LCWIP Consultation Report also identifies 14 priority walking routes. These are shown in **Figure 2.2**.

Figure 2.2: Emerging LCWIP priority walking routes



Source: Medway.gov.uk with Pell Frischmann annotations

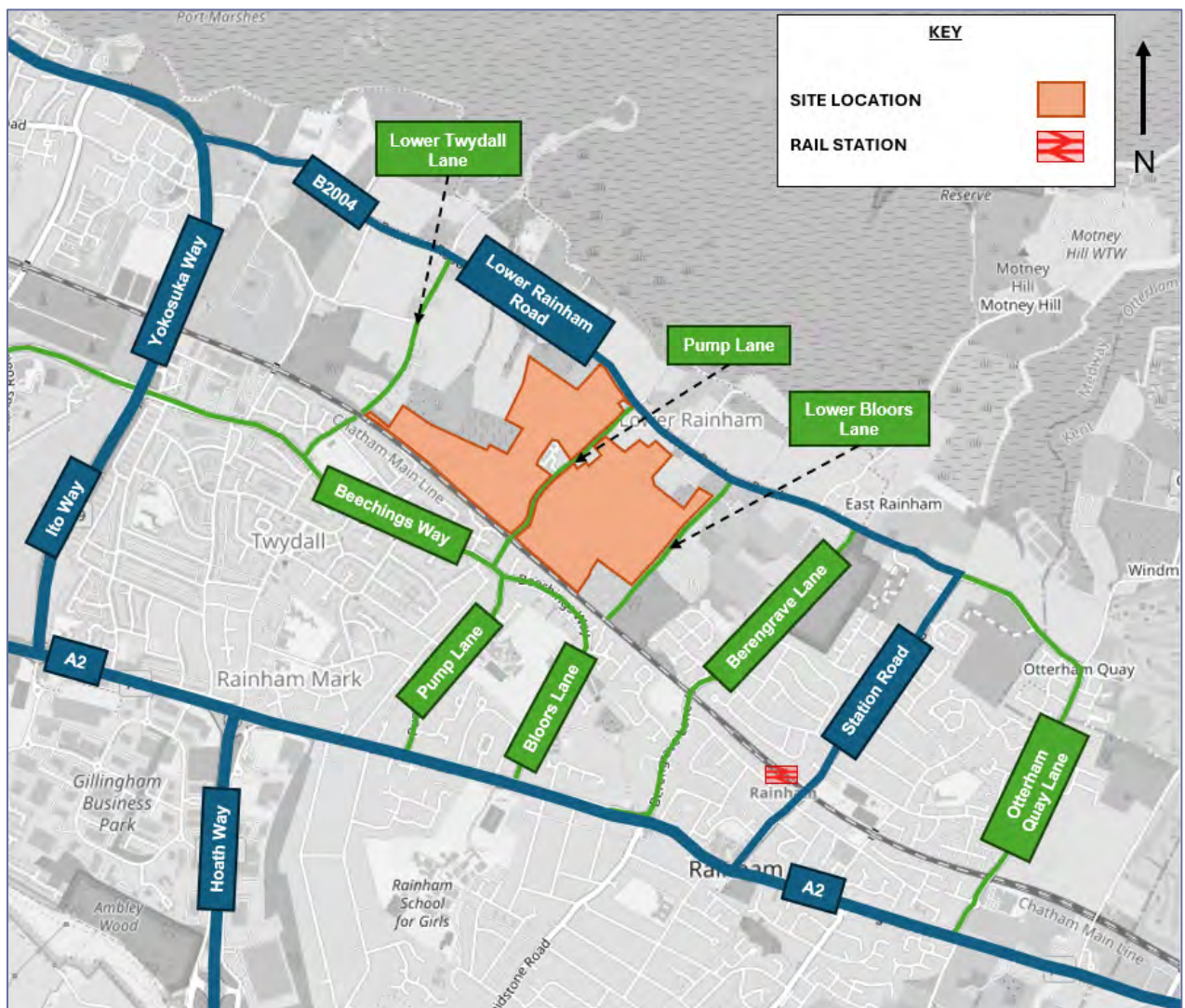
2.2.40. The LCWIP Consultation Report states that the identified priority walking and cycling routes have been audited to identify where improvements are required to bring the route up to the expected standard. It also mentions that concept designs have been created for the routes, noting that these are early-stage designs intended to give an indication of the type of improvement that could be considered to bring the route up to standard and attract more people to walking and cycling. However, consultation drawings only appear to have been produced for two of the walking routes (5 and 8) and for 8 of the cycling routes (2 and 5-11). It is therefore unclear as to whether the other routes included in the consultation document are no longer being promoted, or whether drawings have not been produced for them yet.

3. Existing Transport Conditions

3.1. Site Location

- 3.1.1. The site is located in Lower Rainham, approximately 400m south of the Medway River Estuary, and is currently in use as a fruit orchard. The site is bound to the north by the B2004 and beyond this the Medway River Estuary. To the south the site is bound by Chatham Main Line railway line and beyond that by residential developments. To the west and east the site is bound by further open fields predominantly used for agricultural purposes.
- 3.1.2. The site in the context of the wider highway network is identified in **Figure 1.1**. The site in the context of the local setting is presented in **Figure 3.1**.

Figure 3.1: Site location and local highway network



Source: © OpenStreetMap contributors with Pell Frischmann annotations

3.2. Highway Network

- 3.2.1. The site is located on the north eastern border of Gillingham which is well connected to surrounding areas. The key roads that enable access to the development site are shown on **Figure 3.1** and are described in detail individually below.

Pump Lane

- 3.2.2. The site straddles Pump Lane which runs north-south between the B2004 Lower Rainham Road and Beechings Way respectively. Pump Lane is a narrow road approximately 4m wide meaning there is limited opportunity for two-way vehicle passage. Pump Lane is subject to a 30mph speed limit with additional vehicle height and width restrictions of 13'6" and 6'6" respectively.
- 3.2.3. At the northern boundary of the site Pump Lane connects to the B2004 Lower Rainham Road in the form of a simple priority T-junction.
- 3.2.4. To the south, Pump Lane passes under the rail line where the carriageway narrows, and shuttle working is required for vehicles to pass each other through this section. Approximately 150m south of the railway bridge, Pump Lane joins Beechings Way via a simple priority T-junction.

Lower Bloors Lane

- 3.2.5. Lower Bloors Lane runs north-south along the eastern boundary of the site and is subject to a 30mph speed limit. This lane is similarly narrow as Pump Lane and narrows further at the southern end, resulting in a no through route for vehicles where it meets the railway line. Where Lower Bloors Lane meets the rail line there is a footbridge crossing which provides pedestrian access onto the wider network south of the site and into the centre of Rainham.

Lower Twydall Lane

- 3.2.6. To the west of the site, Lower Twydall Lane runs north-south between the B2004 Lower Rainham Road and Beechings Way respectively. However, the lane is separated by the railway line, resulting in the northern section accessed from Lower Rainham Road being a no through route for vehicles. Similar to Lower Bloors Lane, where Lower Twydall Lane meets the rail line there is a footbridge crossing which provides pedestrian access onto the wider network south of the site. However, it is understood that this footbridge is currently closed off.
- 3.2.7. The section of Lower Twydall Lane north of the rail line is subject to a 40mph speed limit and has a 7.5t vehicle weight restriction, except for access. It also provides a connection to Grange Road approximately 300m south of its junction with Lower Rainham Road.
- 3.2.8. The section of Lower Twydall Lane south of the rail line is subject to a 30mph speed limit and provides access to residential dwellings, connecting to Beechings Way at its southern end via a priority T-junction with ghost island right turn lane.

B2004 Lower Rainham Road

- 3.2.9. The B2004 Lower Rainham Road is a single carriageway road, connecting to the B2004 Station Road at its eastern end and to the A289 at its western end. To the west the B2004 provides access to minor local roads including Lower Twydall Lane, Eastcourt Lane and Lower Featherby Road and eventually runs to a 4-arm roundabout where Yokosuka Way can be accessed to the south and the A289 Gads Hill to the north west. To the east the B2004 provides access to minor local roads including Pump Lane, Lower Bloors Lane, Motney Hill, Berengrave Lane and Station Road. Station Road and Ottenham Quay Lane can be followed south for approximately 1.5km where they join the A2 trunk road.
- 3.2.10. To the west where the B2004 carriageway runs through Lower Twydall the single carriageway has an approximate width of 7m and is subject to a 40mph speed limit. Further east as the B2004 enters Lower Rainham the width of the single carriageway becomes more variable as it passes through residential frontages. The speed limit here is reduced to 30mph, inclusive of the junction where Pump Lane meets the B2004. The route is managed by a series of traffic light controls which incorporate shuttle working and speed cushions.

Beechings Way

- 3.2.11. Beechings Way is a local distributor road providing access to a number of residential streets within the local vicinity and connecting the eastern border of Gillingham with the A2 corridor. It is subject to a 30mph speed limit and connects to Bloors Lane to the east and the A289 to the west.

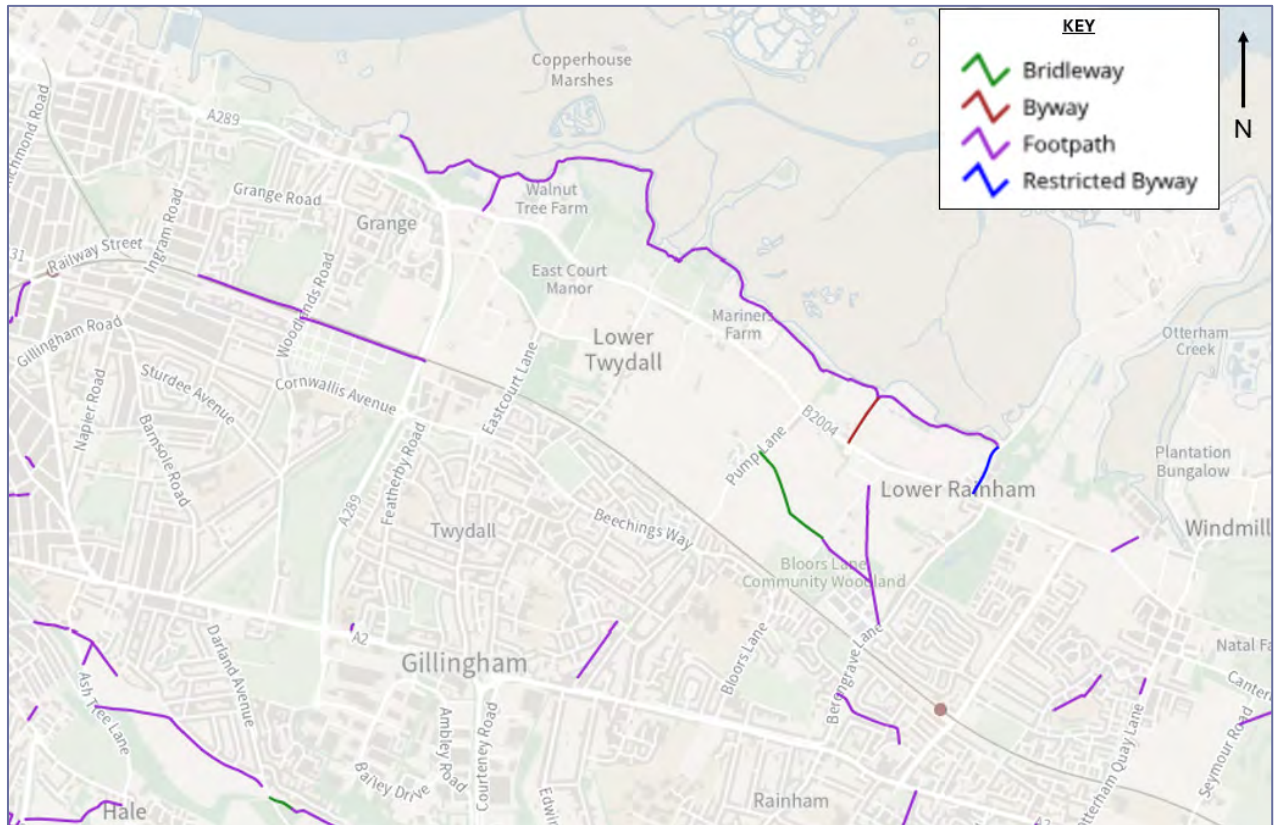
Wider Highway Network

- 3.2.12. The A2 trunk road which runs approximately 1.5km south of the site centre can be accessed via the local road network which runs south from Beechings Way. Ito Way, located to the west of the site services the A2 via a 4-arm roundabout. The A2 runs west to the south east connecting a number of towns and cities. Proceeding south east, the carriageway passes through the city of Canterbury and eventually meets the coast at Dover approximately 70km south east of the site. To the west the A2 runs north through Chatham at approximately 7km from the site, Dartford at approximately 40km and into the centre of London at approximately 70km.
- 3.2.13. The A229 and A249 run along the eastern border and western border of Lower Rainham respectively, these A-roads in combination with the A2 form the principal road network within the area and service the M2 and M20. The A249 runs from the coast at Sheerness (north of the site), through Rainham and south to Maidstone. The A229 runs from Chatham through to Maidstone and south from here for approximately 33km to Hurst Green Village. From this location Hastings can be accessed via the A21.
- 3.2.14. The M2 is located south of the site and runs for approximately 40km providing an alternative route to the port at Dover. It provides links to the M25 running east towards Reading. Further south from the M2, the M20 spans north west to south east connecting Folkestone and Aylesford. This carriageway provides links to a number of trunk A-roads including the A259 and A21 south and the A28 north.

3.3. Walking

- 3.3.1. Given the nature of Pump Lane, Lower Bloors Lane and Lower Twydall Lane being narrow lanes, no footways are provided along these routes. However, the sections of Pump Lane and Lower Twydall Lane on the southern side of the rail line, where the carriageways are wider, have footways on both sides of the road.
- 3.3.2. Footway provision along Lower Rainham Road varies along its length, although a footway is provided along the northern side of the carriageway over the majority of the route between Berengrave Lane to the east and the A289 to the west.
- 3.3.3. As identified previously, where Lower Bloors Lane meets the rail line there is a footbridge crossing which provides pedestrian access onto the wider network south of the site and into the centre of Rainham.
- 3.3.4. Similar to Lower Bloors Lane, where Lower Twydall Lane meets the rail line there is a footbridge crossing which provides pedestrian access onto the wider network south of the site.
- 3.3.5. Provision for pedestrians within the more built-up areas of Rainham and the surrounding areas is more consistent with footways on either side of the roads and commonly with grass verges separating the footway from the carriageway. Pedestrian crossings are also provided, with a mix of uncontrolled facilities with dropped kerbs and tactile paving, and signal-controlled crossings.
- 3.3.6. A number of Public Rights of Way (PRoW) are located within the vicinity of the site, including a bridleway that runs east-west through the proposed development site connecting to Lower Bloors Lane to the east and Pump Lane to the west. These PRoW, as identified on MC's online mapping system, are shown in **Figure 3.2**.

Figure 3.2: Local Public Rights of Way

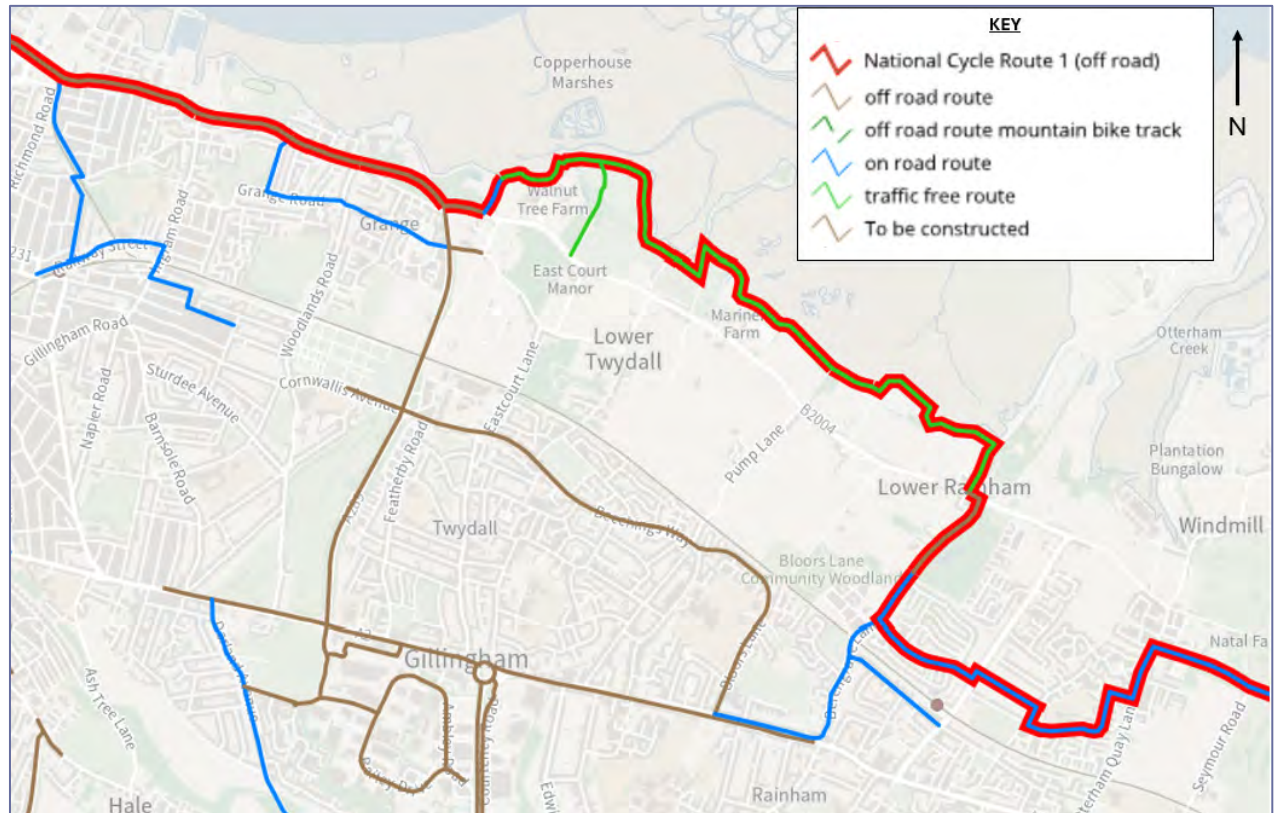


Source: Medway.gov.uk with Pell Frischmann annotations

3.4. Cycling

- 3.4.1. National Cycle Network (NCN) Route 1 runs into Lower Rainham from the east, routing north along Berengrave Lane where it meets the Medway River path. NCN Route 1 is located approximately 1km east from the site's northern boundary allowing easy access to this off-road traffic free cycle route.
- 3.4.2. A local cycle route also runs along the southern section of Bloors Lane, south of the rail line, and continues along Beechings Way via shared use facilities.
- 3.4.3. Cycle routes within the vicinity of the site, as identified on MC's online mapping system, are shown in **Figure 3.3**.

Figure 3.3: Local Cycle Routes

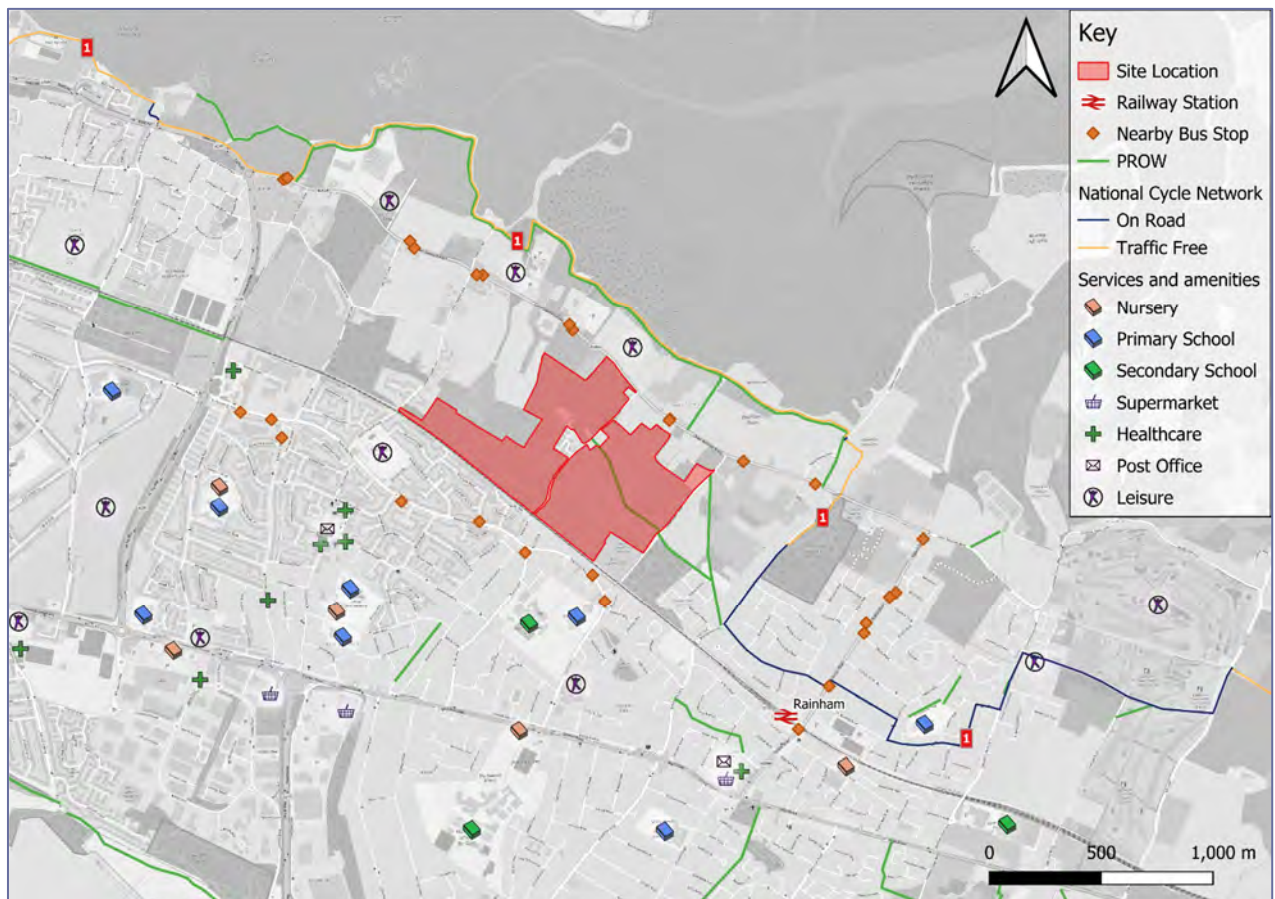


Source: Medway.gov.uk with Pell Frischmann annotations

3.5. Access to Amenities and Services

- 3.5.1. **Figure 3.4** identifies the existing amenities and services that are located within the vicinity of the site. This demonstrates that the site is located in proximity to multiple existing amenities, including schools, GP surgeries, transport services, shops and leisure facilities including open space / country parks.

Figure 3.4: Local Services and Amenities



Source: © OpenStreetMap contributors with Pell Frischmann annotations

3.5.2. The Chartered Institute for Highways and Transportation (CIHT) document 'Providing for Journeys on Foot' states at paragraph 1.12 that:

"walking accounts for over a quarter of all journeys and four fifths of journeys of less than one mile"

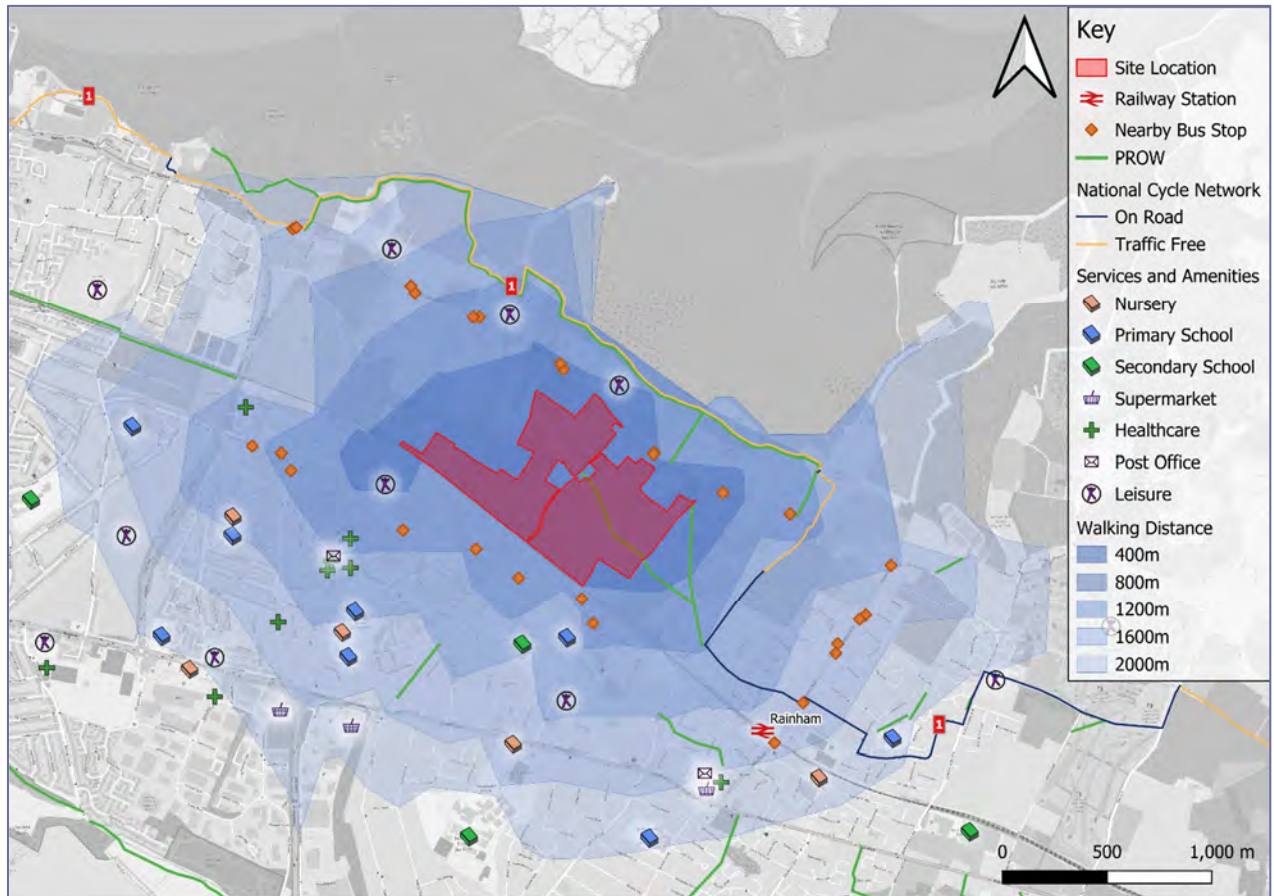
3.5.3. The document also provides suggested acceptable walking distances for a range of destinations. Those suggested walking distances have been reproduced in

Table 3.1: CIHT suggested acceptable walking distances

Distance category	Town centres (m)	Commuting / school / sightseeing (m)	Elsewhere (m)
Desired	200	500	400
Acceptable	400	1,000	800
Preferred maximum	800	2,000	1,200

3.5.4. **Figure 3.5** illustrates the identified walking catchments up to 2,000m walking distance (25-minute walk time) from the site.

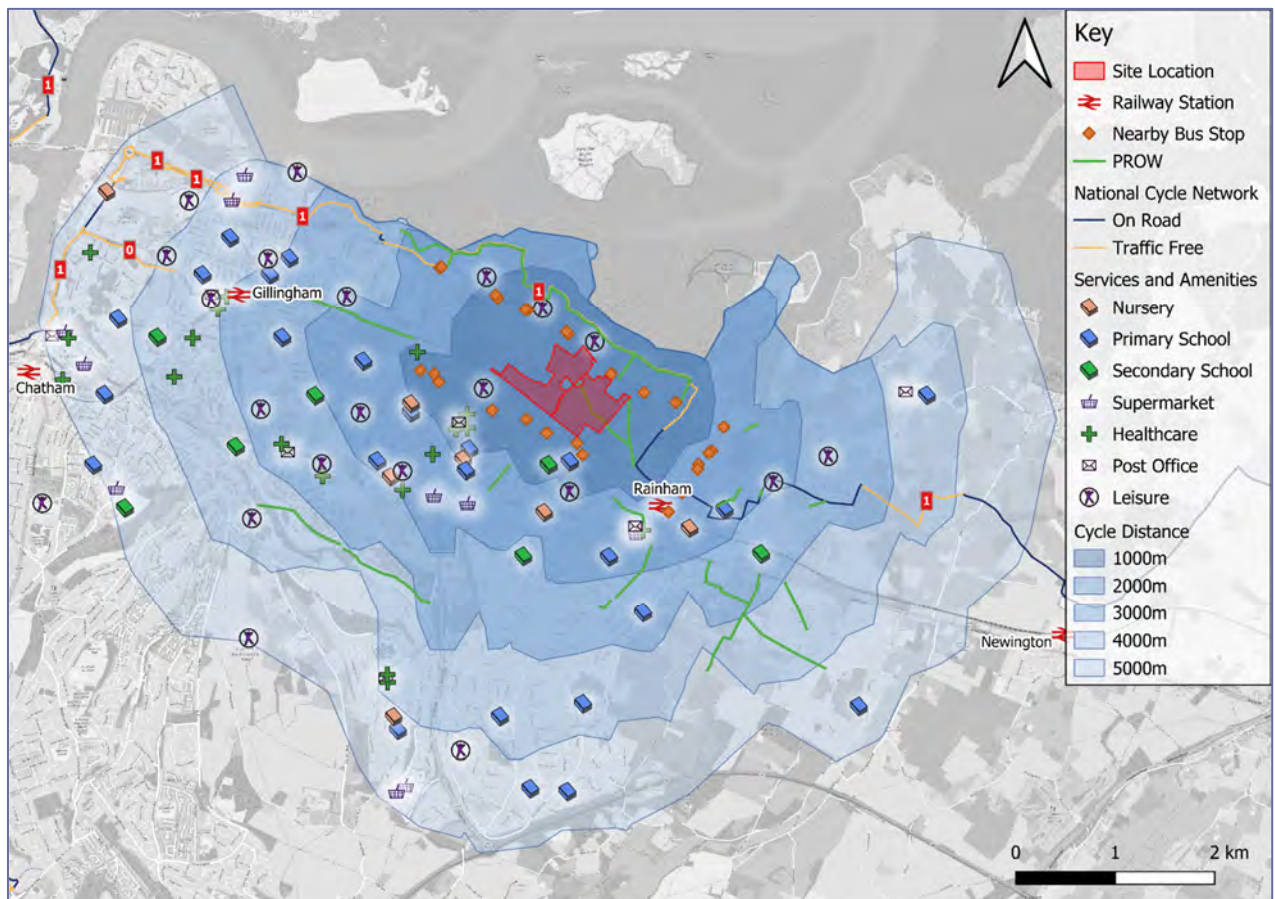
Figure 3.5: Walking catchment – 2,000m / 25-minute walk time



Source: © OpenStreetMap contributors with Pell Frischmann annotations

- 3.5.5. National and Local policy encourages sustainable development and a shift away from private car use. However, there is no specific recommended maximum cycle distances for access to services / leisure facilities from new developments stated within the NPPF or local planning policy.
- 3.5.6. It is noted that the distances people will be willing to travel on a bicycle will be highly variable depending on the type of development, site users and age profile as well as the perception of personal safety in the local environment. However, Local Transport Note 2/08 (published by the Department for Transport) does provide a useful reference point. It indicates that an acceptable distance for general trips by cycle is considered to be up to 5km (5,000m), but it also acknowledges that this may be slightly longer (up to 8km) for those commuting to employment uses by cycle.
- 3.5.7. **Figure 3.6** demonstrates the cycle catchment up to 5,000m cycle distance (25-minute cycle time) from the site.
- 3.5.8. The evidence on both walking and cycle accessibility highlights there are substantial facilities available to future residents to benefit from all of which helps to reduce the demand for travel by car. The sites proximity to the Riverside Country Park is a particular asset of this site given that the ease of access, by foot and cycle, provides residents with substantial health and wellbeing benefits.

Figure 3.6: Cycle catchment – 5,000m / 25-minute cycle time



Source: © OpenStreetMap contributors with Pell Frischmann annotations

3.6. Public Transport

Bus

- 3.6.1. There are a number of bus stops located within the vicinity of the site. The nearest of which are located on Beechings Way approximately 600m south of the centre of the proposed development site, and on Lower Rainham Road approximately 600m north of the centre of the site. Regular services run to and from these stops routing through Lower Rainham and providing links to towns and cities further-a-field.
- 3.6.2. A summary of the existing bus services that are available from the stops on Beechings Way and Lower Rainham Road are provided in **Table 3.2** and an extract of the Medway bus services network map is provided in **Figure 3.7**.

Table 3.2: Summary of local bus services

Service	Destinations	Mondays – Fridays	Saturdays	Sundays
130 (Nu-Venture)	Twydall Shops - Rainham - Farthing Corner - Parkwood - Wigmore - Hempstead Valley - Bredhurst - Boxley - Maidstone	Every 2 hours 07:00-17:00	4 services per day	No services
	Maidstone - Boxley - Bredhurst - Hempstead Valley - Wigmore - Parkwood - Farthing Corner - Rainham - Twydall Shops	Every 2 hours 08:30-18:00	4 services per day	No services
131 (Nu-Venture)	Gillingham ASDA - Lower Rainham - Berengrave Lane - Childscroft Road - Rainham - Twydall	1 service per day	No services	No services
	Twydall - Rainham - Childscroft Road - Berengrave Lane - Lower Rainham - Gillingham ASDA	1 service per day	No services	No services
101 (Arriva)	Gillingham - Historic Dockyard - Gun Wharf - Chatham - Chatham Rail Station - Huntsman's Corner - Davis Estate - Bridgewood - Springfield - Maidstone	Every 15 mins 05:45-23:45	Every 30 mins 06:00-08:00, every 15 mins 08:00-17:30, every 30 mins 17:30-23:45	Every 20 mins 08:00-17:00, every hour 17:00-19:15
	Maidstone - Springfield - Bridgewood - Davis Estate - Huntsman's Corner - Chatham Rail Station - Chatham - Gun Wharf - Historic Dockyard - Gillingham	Every 15 mins 06:30-23:15	Every 30 mins 06:45-09:00, every 15 mins 09:00-19:45, every 30 mins 19:45-00:10	Every 20 mins 09:15-17:15, every hour 17:15-20:15
116 (Arriva)	Chatham - Universities - Mid Kent College - Gillingham - Medway Maritime Hospital - Jezreels - Tesco's Rainham Mark - Twydall - Rainham - Parkwood - Wigmore - Hempstead Valley	Every 30 mins 07:30-14:30, every hour 14:30-18:15	Every 30 mins 07:45-14:30, every hour 14:30-16:45	No services
	Hempstead Valley - Wigmore - Parkwood - Rainham - Twydall - Tesco's Rainham Mark - Jezreels - Medway Maritime Hospital - Gillingham - Mid Kent College - Universities - Chatham	Every 30 mins 07:00-14:30, every hour 14:30-18:00	Every 30 mins 07:45-14:30, every hour 14:30-17:45	No services
182 (Arriva)	Chatham - Chatham Historic Dockyard - Brompton - Gillingham - Twydall	Every 15 mins 06:15-17:45	Every 15 mins 06:30-16:45	No services
	Twydall - Gillingham - Brompton - Chatham Historic Dockyard - Chatham	Every 15 mins 05:45-18:15	Every 15 mins 06:30-17:00	No services
183 (Nu-Venture)	Twydall - Beechings Way - Hastings Arms - Hazlemere Drive - Grange Road - Gillingham Green - Church Street - The Strand - Pier Road - Gillingham Pier ASDA	2 services per day	No services	No services
	Gillingham Pier ASDA - Pier Road - The Strand - Church Street - Gillingham Green - Grange Road - Hazlemere Drive - Hastings Arms - Beechings Way - Twydall	2 services per day	No services	No services

Figure 3.7: Existing bus services network map



Source: Medway.gov.uk

- 3.6.3. It should be noted that Medway Council has adopted the MY school bus service, providing local school students who attend schools within the Medway district with specific bus services to their school destination.
- 3.6.4. In order to use these bus service students are required to have a MY school bus pass. The purchase options and costs of this pass are as follows:
- One term: £70
 - Two terms: £130
 - Six terms (full school year): £350
- 3.6.5. Each MY bus service provides access to different schools within the Medway district. The MY2 and MY3 services run from Gillingham to Rainham Mark Grammar School and Rainham Girls School. The MY4 service runs to the Rainham Mark Grammar School from Wigmore. The MY5 and MY7 services run to Rainham Mark Grammar School from Wigmore and Hempstead respectively.
- 3.6.6. Each of the MY school bus services operates a single morning 'home-to-school' operation and a single afternoon 'school-to-home' operation.
- Rail**
- 3.6.7. The closest railway station to the site is Rainham Railway Station which is located approximately 2.5km south east of the proposed development site. It can be accessed via Pump Lane and Lower Rainham Road to the north or Pump Lane and Beechings Way / Tufton Road to the south. Bus service 131 that runs along Lower Rainham Road provides a connection between the site and the station.

- 3.6.8. The station is operated by Southeastern and provides a number of facilities to travellers. There are enough bicycle parking stands to store 64 bikes securely, and a car park which has 113 spaces including 6 accessible spaces. The car park is in operation 24 hours a day between Monday and Sunday and parking charges apply.
- 3.6.9. There is a taxi-rank and general drop-off/pick-up area immediately in front of the station entrance. The station provides a ticket office and several ticket machines from which tickets for travel can be purchased or pre-booked tickets can be collected. There are also some amenities including an ATM machine, a pay phone, shops, sheltered waiting room and toilets.
- 3.6.10. The station lies on the principal south east rail route. Train services are available directly to and from the main regional centres at London and Dover. These destinations provide access to regions further-a-field.

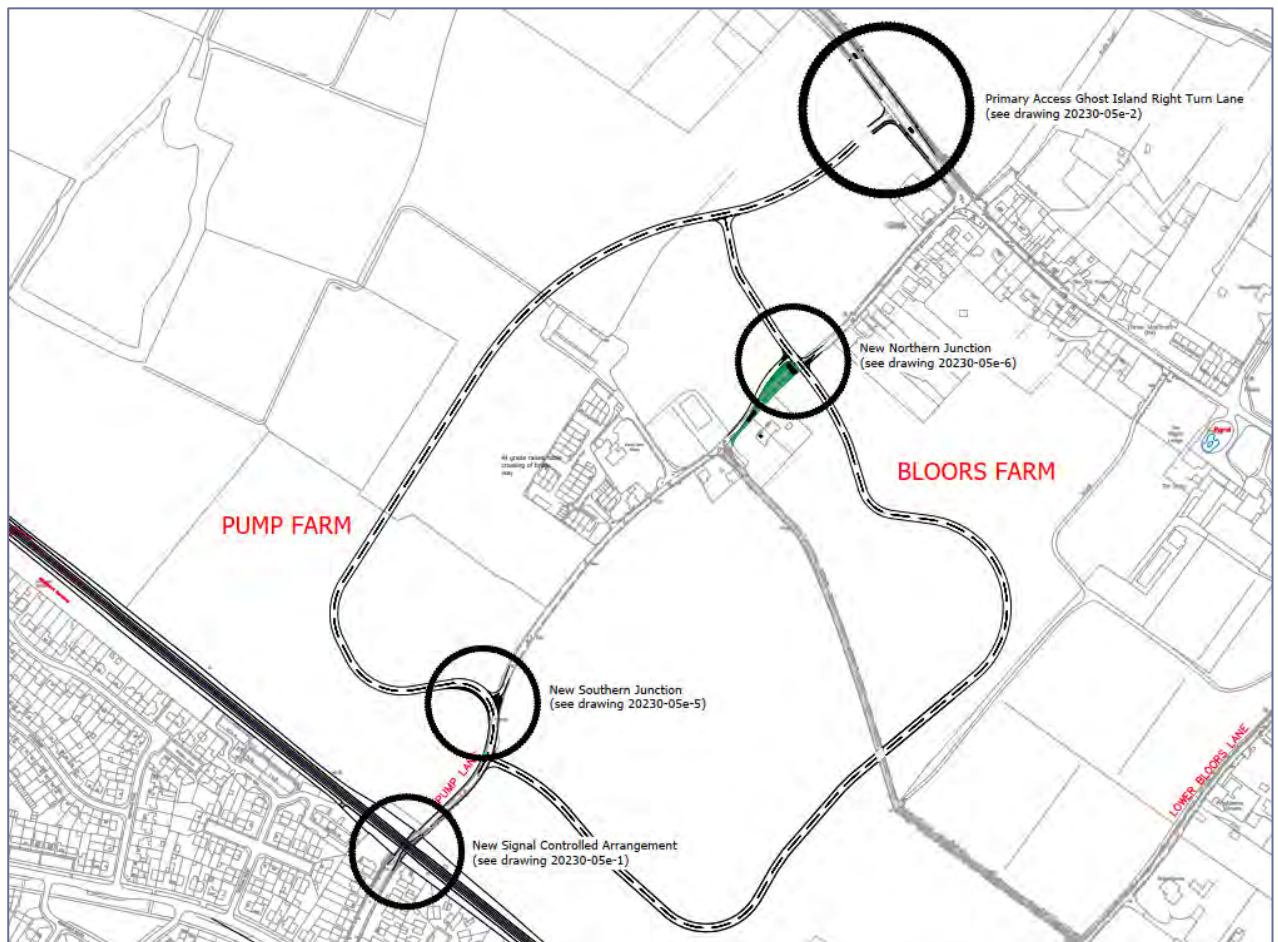
4. Confirmation of Accepted Matters

4.1. Site Access Arrangements

4.1.1. The vehicle access arrangements proposed as part of the previous scheme are shown in **Figure 4.1** and comprised the following:

- Primary access onto Lower Rainham Road via a new priority junction arrangement with ghost island right turn lane.
- A new signal-controlled arrangement at the southern end of Pump Lane where it runs underneath the railway bridge.
- North of the railway overbridge a new junction and side road to the east will join Pump Lane. Pump Lane will be realigned northwards into the proposed development site.
- North of no. 328 Pump Lane, it is proposed to realign Pump Lane northwards to create a new staggered junction with an east/west development access road.

Figure 4.1: 2019 Application Proposed Access Strategy

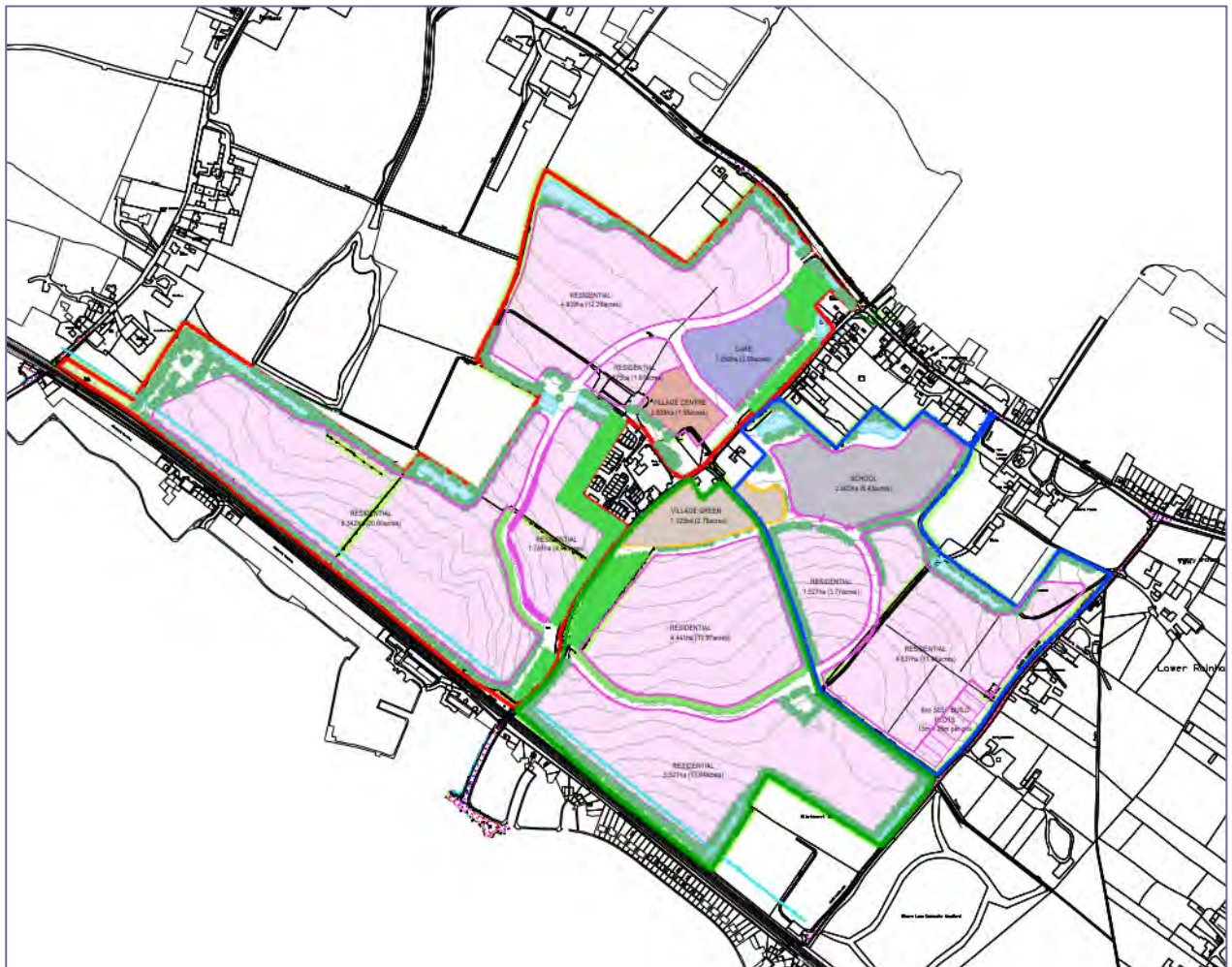


Source: DTA Transport Assessment Addendum (September 2020), Land at Pump Farm and Bloors Farm, Lower Rainham

4.1.2. An independent Stage 1 Road Safety Audit (RSA) was carried out for the site access arrangements proposed as part of the previous scheme. It was noted that all recommendations from the RSA were accepted and that it was common ground with the Council and the local Highway Authority that all site access arrangements were acceptable. The Inspector's Report stated that it was agreed common ground between the Applicant and MC that the site access arrangements are suitable and would operate within capacity.

- 4.1.3. The Transport Assessment submitted with the application noted that the pedestrian/cycle access to the proposed development site would be achieved through a number of connection points, as indicated on the illustrative masterplan shown in **Figure 4.2**.

Figure 4.2: 2019 Application Illustrative Masterplan



Source: DTA Transport Assessment Addendum (September 2020), Land at Pump Farm and Bloors Farm, Lower Rainham

- 4.1.4. The proposed pedestrian and cycle connection points included the following:
- Via the proposed vehicle access from Lower Rainham Road.
 - Via a series of footpath links to the site including from Lower Rainham Road (north), Lower Bloors Lane (east), and Lower Twydall Lane to the (west).
 - Via the proposed vehicle access from Beechings Way and on to Pump Lane (south).
- 4.1.5. It was also proposed to provide a 2.5m wide shared footway/cycleway adjacent to the carriageway at the railway bridge at the southern end of Pump Lane. This would be introduced as part of the proposed signal-controlled scheme at this location, and which would provide a shuttle working arrangement.

4.2. Accessibility

- 4.2.1. The Framework Travel Plan that was submitted with the previous application was agreed in principle with MC. However, the measures and targets that were proposed previously would be reviewed, and further measures to encourage travel by sustainable and active travel modes would be considered as part of any future planning application.
- 4.2.2. The Appellant's closing submissions included the statement that the Council agrees with the Appellant's position that the site is appropriate for residential development in the context of

accessibility. From review of the post-submission and Inquiry documents, the accessibility of the site and proposed connections was accepted by MC. This is a core consideration in determining the suitability of any site and one that is further emphasised through the consultation draft of the National Planning Policy Framework (NPPF), 31st July 2024. This places a particular focus on vision and validate and that a severe impact should only apply if this is met in all tested scenarios.

- 4.2.3. It is evident from the previous application documents that discussions had been held with Arriva regarding the scope for further improving existing bus services. These documents also identified that it had been agreed with Arriva and MC that the most appropriate way to serve those areas of the site which are more remote from the existing bus stops to the south would be to extend Bus Service 1. This service currently terminates at The Strand, which is approximately 3.5km west of the site on the A289. This would therefore provide an additional service over and above the existing bus services in this area with an additional route and frequencies.
- 4.2.4. It was proposed for Bus Service 1 to continue along Lower Rainham Road into the site from the north. It was proposed for the requirement for the service to be triggered on the basis of *"more than 100 dwellings more than 500m from an existing bus stop south of the railway line"*. It was also noted that the extension is likely to start off as a peak only service and then be expanded to an all-day service, given the need to provide in particular peak hour rail connections.

4.3. Impact on Strategic Road Network

- 4.3.1. The Proof of Evidence (PoE) submitted by MC as part of the appeal from the previous application stated that *"subject to the Appellant providing an executed Section 106 agreement which secures the mitigation required by Highways England to ensure there will be no material adverse impact on the strategic highway network, the Council will no longer pursue Reason for Refusal 4."*
- 4.3.2. The PoE produced by David Tucker Associates (DTA), on behalf of the Appellant, stated that *"significant progress has been made with Highways England and the current position is that the trip generation assumptions from the site as defined in the original Transport Assessment and subsequent responses to HE are agreed. The distribution of those movements is also agreed and the absolute number of additional trips on the Strategic Road network is also agreed."*
- 4.3.3. The DTA PoE also stated that *"Highways England have confirmed that they see no reason to prevent planning being granted but have recommended that Medway secure a proportional and appropriate contribution towards Junction 4 of the M2."* It goes on to state that the Appellant agrees to this, and that Reason for Refusal 4 is therefore not being pursued by Highways England (now National Highways).
- 4.3.4. The DTA PoE noted that Highways England (HE) has now agreed a scheme for Junction 4 of the M2 to mitigate the impacts of the development proposed, involving a contribution towards improvements at the junction. DTA noted that agreement between the Appellant and HE is entirely separate from any MAM modelling and that HE did not seek MAM outputs and based its decision wholly on the technical work in conjunction with the TA and Addendum. This is despite the junction in question being within the MAM area.

4.4. Planning Obligations

- 4.4.1. A draft planning obligation in the form of a deed of agreement was submitted in support of the appeal. It was supported by a CIL Compliance Statement prepared by the Council, which sets out its reasons for concluding that the various obligations would accord with Regulation 122 of the CIL Regulations. There was no dispute that the obligations meet the relevant tests.
- 4.4.2. The main provisions, subject to the usual contingencies, were summarised as follows:
- Financial contributions towards –
 - i. Secondary and sixth form provision in the area;
 - ii. Provision, improvement and promotion of waste and recycling services;
 - iii. Improved facilities and equipment at Rainham Library, or relocation of the library to the town centre if the existing site reaches capacity;

- iv. Public realm improvements, including development of a new square/civic space in Rainham Precinct shopping centre and improvements to the Precinct gateway;
- v. Improvements to public rights of way within 1.6km of the site;
- vi. Redevelopment works at Splashes Leisure Pool;
- vii. Improvements to open space and outdoor sports facilities and to Great Lines Heritage Park;
- viii. Offsetting/mitigating the impact of takeaway establishments;
- ix. Mitigation measures to protect the habitats of wintering birds;
- x. Bus infrastructure comprising bus shelter improvements along Lower Rainham Road and interim assistance to support bus service provision;
- xi. The extension, refurbishment or upgrade of existing premises within Medway South Primary Care Network; and,
- xii. Highway improvements to Junction 4 of the M2 motorway.

- Financial contributions towards a nursery and 2 form entry primary school and the provision of the allocated land within the site for that to be constructed.
- Provision of open space within each phase of the development and a management plan to an approved specification for that open space, together with arrangements to transfer the open space to a management company.
- Minimum 25% on-site affordable housing, with a 60/40 split of rented and shared ownership provision.

4.4.3. Esquire Developments will deliver the same relevant mitigation proposed as part of the previous application, or similar.

5. Scheme Proposals Summary

5.1. Development Overview

- 5.1.1. The quantum of development that is now being proposed for allocation is up to 800 residential units, a school, local centre, care home and open space. This is a reduction to what was previously proposed and ultimately refused at planning appeal by the Planning Inspectorate, with the number of dwellings reduced by approximately 36%.
- 5.1.2. It is currently envisaged that the local centre, care home and school would be provided in the north western corner of the development site. Whilst the specific facilities to be provided within the local centre are yet to be determined, they are likely to include retail uses, GP/healthcare centre, children's nursery, and mobility hub. The size and type of school that will be provided is also subject to further discussion. These are all uses that help to reduce the movement of people away from the site and enables a focus on trip containment, with trips more likely on foot or by bicycle, so as to reduce the impact of vehicle trips on the wider highway network.
- 5.1.3. An indicative layout for the proposed development is shown in **Figure 5.1** and provided at a larger scale at **Appendix A**.

Figure 5.1: Indicative Development Site Layout



Source: Courtesy of BPTW

5.2. Pedestrian and Cycle Access

- 5.2.1. As described in Section 3 of this report, there are a number of existing pedestrian and cycle routes located within the vicinity of the site. This therefore provides an opportunity to provide connections from within the site as part of the development to the existing routes and facilities.

- 5.2.2. In order to maximise the accessibility of and within the site by walking, wheeling, cycling, public transport and shared travel, the internal layout will be designed to prioritise movement by these modes over cars. As such, the internal street layouts and active travel routes will be designed to accommodate this, and to provide connections to routes off-site to facilitate access to facilities and destinations in the wider area by sustainable modes. The indicative development site layout at **Appendix A** provides context for this. This will enable connections to be made from all directions within the site to coincide with potential desire lines. This will include a route within the site that will run along the northern side of the rail line, providing connections between the three locations where crossing the rail line is possible.
- 5.2.3. Provisions for pedestrians and cyclists will also be made at the proposed vehicle access points, although it is acknowledged that there are constraints at some of these locations. In particular, the southern end of Pump Lane is constrained by the available width where it passes under the railway bridge.
- 5.2.4. Esquire Developments will also seek to investigate potential improvements that could be made to existing routes off-site in order to enhance active travel links and connectivity in the area. This including the route along Lower Rainham Road to the west of Pump Lane, the PRow that connects to NCN Route 1 from Lower Rainham Road. There may also be scope to provide enhancements to the existing footbridges over the rail line from Lower Bloors Lane and Lower Twydall Lane, to better accommodate cyclists.

5.3. Vehicle Access

- 5.3.1. The primary vehicle access into the development site is proposed to be provided from Lower Rainham Road via a new junction. The form of the access junction will be determined through discussions with MC. It is noted that the accepted arrangement proposed as part of the previous application was a priority T-junction with a ghost island right turn lane. However, it is expected that a signal-controlled junction would be proposed as part of any new planning application as this will enable better crossing facilities to be provided for pedestrians and cyclists.
- 5.3.2. Secondary access is to be provided from Pump Lane. The current strategy involves the northern section of Pump Lane, between its junction with Lower Rainham Road and 330 Pump Lane, to be changed to one-way for southbound traffic only. This would enable the existing lane to be narrowed to facilitate footway provision over this section, within public highway land, given the land ownership constraints. This would retain vehicle access to the existing properties at the northern end of Pump Lane, whilst providing improved facilities for pedestrians and cyclists. Existing residents would be able to loop around using the new road to connect back onto Lower Rainham Road via the new junction.
- 5.3.3. The existing vehicle access from the southern end of Pump Lane, which connects to Beechings Way, is proposed to be retained. However, it is expected that a signal-controlled shuttle working arrangement would be provided where the lane runs under the railway bridge. This is as per the arrangement that was agreed as part of the previous application.
- 5.3.4. It is currently envisaged that a portion of the lower density dwellings proposed as part of the development would be accessed from Lower Bloors Lane along the eastern boundary of the site. Given the width of the existing lane, it is likely that it will need to be widened to accommodate two-way vehicle movements along its length. The principle of this and the potential arrangements would be reviewed further and discussed with MC as part of any future planning application for the development.
- 5.3.5. Similar to the above, it is also envisaged for a small portion of the proposed dwellings in the south western corner of the site to be accessed from Lower Twydall Lane. There would be potential for these dwellings to be accessed from an internal road, accessed from Pump Lane, if necessary. This would be discussed with MC.

5.4. Parking Provision

Cycle Parking

- 5.4.1. Cycle parking for residential dwellings is to be provided at a minimum rate of 1 space per dwelling. Parking is to be accommodated within garages where properties include them and in an enclosed cycle store within gardens where a property does not have a garage.
- 5.4.2. Cycle parking for the non-residential uses will be provided in line with adopted MC parking standards. Cycle parking will be provided within the public realm areas, most likely in the form of Sheffield cycle stands, and where possible covered.
- 5.4.3. In addition to the above, mobility hubs are proposed to be provided within the site in order to ensure that the vision of having active and sustainable travel at the core of the development is achievable. It is currently envisaged that an arrival square will be provided in the northern part of the site, which would include the main mobility hub.
- 5.4.4. Secondary mobility hubs would then be provided in the southern part of the site to ensure sufficient coverage is achieved for all residents within the development site to be able to access facilities that will encourage travel by active and sustainable modes. Further details on mobility hubs are provided in Section 8 of this report.

Car Parking

- 5.4.5. It is envisaged that car parking for the proposed development will be provided in line with adopted MC parking standards. However, as noted in Section 2 of this report, reductions of the standards will be considered if the development is within an urban area that has good links to sustainable transport and where day-to-day facilities are within easy walking distance. As a result, Esquire Developments would seek to discuss and agree with MC an appropriate level of car parking provision for all uses proposed, accounting for the location of the site and the vision for the development.
- 5.4.6. The current MC standards do not include guidance in relation to Electric Vehicle Charging (EVC) facilities. Therefore, in line with the guidance provided in 'The Buildings Regulations 2010 document, Infrastructure for the charging of electric vehicles, Approved Document S' it is proposed to provide EVC capability for each dwelling.
- 5.4.7. EVC facilities will also be provided for the non-residential uses proposed as part of the development.

5.5. Servicing and Emergency Vehicle Access

- 5.5.1. The access arrangements and internal site layout will be designed to accommodate refuse collection vehicles in accordance with design requirements.
- 5.5.2. Emergency service vehicles will be able access the development site from the proposed vehicular access points. The internal road networks and development layout will be designed to enable all properties and buildings to be located within an acceptable distance for emergency services access.

6. Multi-Modal Trip Generation Assessment

6.1. Previous Application Trip Generation

- 6.1.1. It is evident that there were disagreements between the applicant / appellant of the previous scheme and MC regarding the trip rates being used to assess the impact of the development. The Council contended that there would be around an additional 800 two-way trips on the highway network in both the AM and PM peaks (around 13 additional trips every minute), based on trip rates used in the MAM. The Applicant's figures, derived from the TRICS database, suggested an additional 585 two-way movements during the AM peak, with an additional 558 two-way movements during the PM peak (around 9.5 additional trips every minute). The vehicle trip generation comparisons are shown in **Table 6.1**.

Table 6.1: 2019 Application Vehicle Trip Generation Comparisons

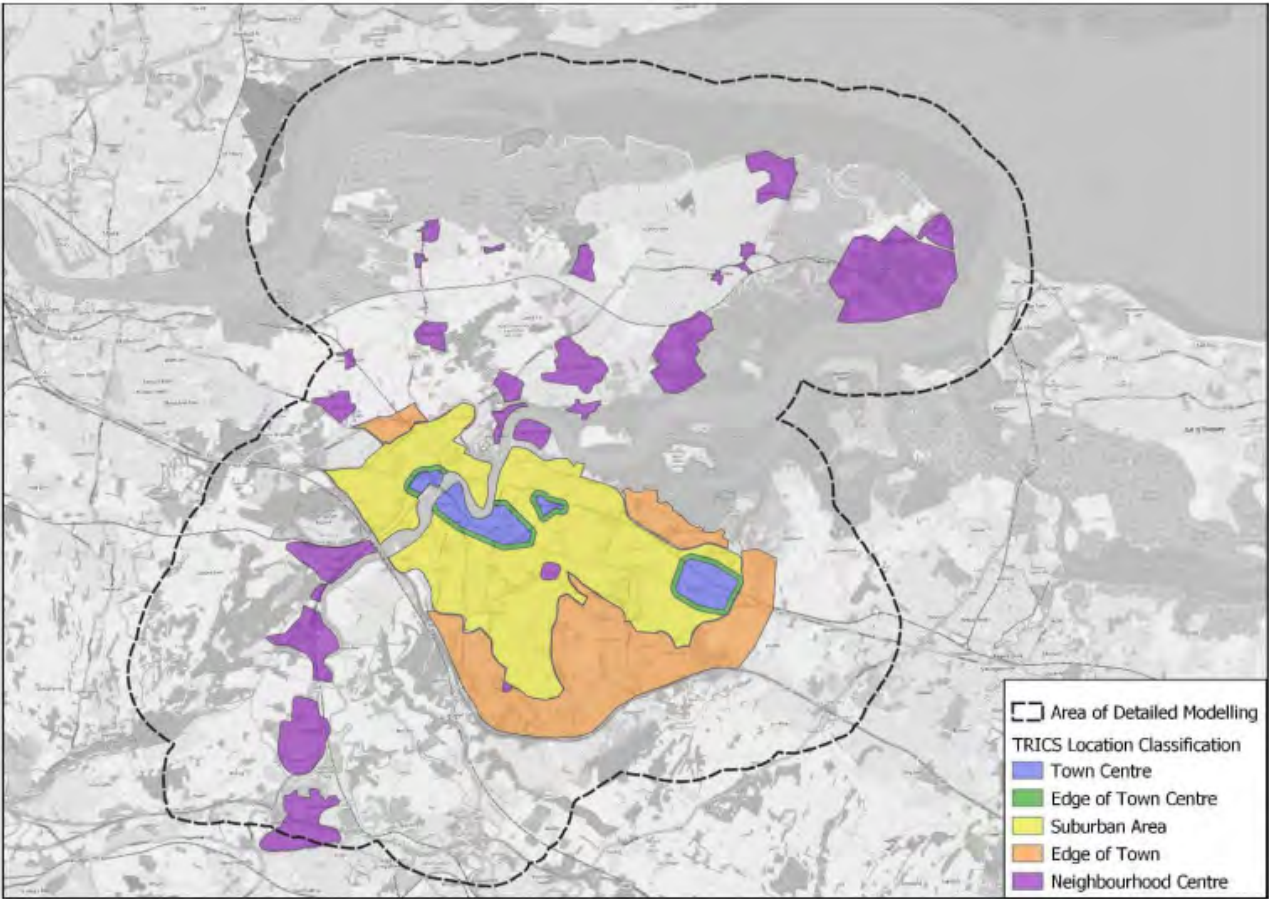
	AM Peak			PM Peak		
	Arr	Dep	Total	Arr	Dep	Total
Applicant	187	398	585	365	193	558
MC	175	624	799	497	307	803
Difference	- 12	+ 226	+ 214	+ 132	+ 114	+ 245

- 6.1.2. The Applicant identified that *"the Council's approach to deriving trip rates makes no allowance for internalisation of trip movements nor indeed the fact that many of the car trips that are generated will be local to site. All trips are distributed on the basis of Journey to Work data and this therefore applies an unreasonable over estimation of traffic generation on the wider network."*

6.2. Emerging Medway Local Plan Trip Rates

- 6.2.1. As part of the emerging Medway Local Plan, a Strategic Transport Assessment has been produced by Jacobs, on behalf of MC. This includes a Forecasting Report that was produced in May 2024. The report sets out the forecasting assumptions and methodology used to assess the possible highway impacts of the emerging Medway Local Plan for Reg18 consultation and the development of the 2041 Reference Case (RC) and Do Something (DS) Local Plan scenarios. The Forecasting Report presents the results of the 2041 DS Local Plan scenario, in comparison to the RC, and identifies any potential 'hot spots' on the network where additional investigation, local junction modelling or mitigation may be required.
- 6.2.2. The Forecasting Report contains a bespoke set of Medway Transport Model (MTM) trip rates that have been developed using TRICS to reflect the varying geography across the borough and agreed with MC, KCC and NH as part of the Forecasting Methodology Technical Note in advance of the forecast model development. The report states that TRICS version 8.0 has been used to obtain appropriate and representative origin and destination trip rate factors by Land Use type (residential, commercial, retail and leisure) and location (town centre, edge of town centre, suburban area, edge of town and neighbourhood centre).
- 6.2.3. The TRICS location classifications for developments within Medway, contained in the Forecasting Report, are shown in **Figure 6.1**.

Figure 6.1: Medway LP Forecasting Report TRICS Location Classification for Developments within Medway



Source: Medway Local Plan – Forecasting Report (May 2024)

- 6.2.4. It appears from **Figure 6.1** that the proposed development site lies within the ‘edge of town’ location classification within the Forecasting Report, although the area to the south of the site is classified as a ‘suburban area’.
- 6.2.5. Table 3-7 of the Forecasting Report provides the residential trip rates derived from TRICS for the different location types and different dwelling types (flats/houses). No trip rates are provided for ‘edge of town’ sites, and it is therefore assumed that the proposed development site would be subject to private houses trip rates for suburban areas. These are replicated in **Table 6.2** together with an indication of the subsequent vehicle trip generation for the proposed development of 800 dwellings if these trip rates were to be used to assess the impact of the development.

Table 6.2: Medway LP Forecasting Report Trip Rates and Subsequent Vehicle Trip Generation

	AM Peak			PM Peak		
	Arr	Dep	Total	Arr	Dep	Total
Trip Rates	0.117	0.394	0.511	0.371	0.187	0.558
Trip Generation (800 dwellings)	94	315	409	297	150	446

- 6.2.6. It is evident from the above that applying the trip rates included in the Forecasting Report to the currently proposed quantum of development would result in fewer vehicle trips than that which was assessed as part of the previous scheme. The difference is particularly significant when comparing with the trip generation figures that MC were suggesting for the previous scheme. **Table 6.3** identifies the

difference between the trip generation of the 800 dwellings, using the Forecasting Report trip rates, and the trip rates appraised under the previous planning application.

Table 6.3: Vehicle Trip Generation Comparisons

	AM Peak			PM Peak		
	Arr	Dep	Total	Arr	Dep	Total
Previous App - Applicant	187	398	585	365	193	558
Previous App - MC	175	624	799	497	307	803
800 Dwelling Scheme	94	315	409	297	150	446
Difference between previous (Applicant) scheme and 800 dwelling scheme	- 93	- 83	- 176	- 68	- 43	- 112
Difference between previous (MC) scheme and 800 dwelling scheme	- 81	- 309	- 390	- 200	- 157	- 357

6.3. Multi-Modal Trip Generation

- 6.3.1. The focus of the assessment for the previous application was on vehicle trip generation, and the Medway Local Plan Forecasting Report also only provides vehicle trip rates. There will be a focus on the sustainability of the site as part of its development, and the promotion of travel by sustainable modes with active travel at its heart. Therefore, it is important to consider both the number of trips that are likely to be made by sustainable modes, and the routes that are likely to be used accounting for key desire lines.
- 6.3.2. To provide an indication of the number of trips that might be generated by different modes of travel, 2011 Census Travel to Work data has been utilised.

Local Centre, Care Home and School Trips

- 6.3.3. For the purpose of this appraisal, the trip generation estimates are focused on the residential element of the development proposals. It is considered that the majority of trips that will be generated by the proposed local centre, care home and school are likely to be internal within the site, or from areas within the immediate vicinity of the site and would be made by sustainable modes of travel rather than generating external vehicle trips.
- 6.3.4. It is likely that there will be little need for external residents to use the local centre as they are already well served with existing local centres in Gillingham, Twydall and Rainham. The local centres at Twydall and Rainham provide a range of uses including card shops, home stores, hairdressers, cafes, pharmacies, bakeries, banks etc.
- 6.3.5. In the event external trips did occur, these are likely to be in low numbers and will be a local trip diverted from a similar use elsewhere and therefore already on the network.

Residential Trips

- 6.3.6. Vehicle trips associated with the residential element of the proposed development, based on trip rates contained in the Medway Local Plan Forecasting Report, are set out in **Table 6.2**.
- 6.3.7. In order to derive multi-modal trips, 2011 Census Travel to Work data has been obtained for people travelling to work from the Medway 018 Middle Super Output Area. This is shown in **Table 6.4**.

Table 6.4: 2011 Census Travel to Work Mode Share

Underground	Train	Bus / coach	Taxi	Motorcycle	Driving a car / van	Passenger in a car or van	Bicycle	On foot	Other
0.1%	4.4%	6.2%	0.3%	1.2%	67.0%	6.8%	2.2%	11.5%	0.3%

- 6.3.8. This data provides an indication of the mode share for existing residents in the local area. It is acknowledged that the data is over 10 years old and travel patterns are likely to have changed, particularly with more people working from home. However, best practice guidance advises the 2011 data to be used instead of 2021 Census Travel to Work data due to the impacts of Covid and furlough at the time the survey was undertaken.
- 6.3.9. It should also be noted that not all trips made during peak hours are associated with commuting, and therefore the Census data does not account for other journey purposes. Other journey purposes include escorted education, business, education, shopping, personal business and leisure.
- 6.3.10. In addition, the Census data does not account for the impact of extending an existing bus service to route through the development site, which Arriva are supportive of. This is discussed in more detail in Section 8 of this report.
- 6.3.11. Nonetheless, **Table 6.5** provides an indication of the minimum number of trips that are likely to be generated by the proposed residential development during peak hours by different modes of travel. This is based on applying 2011 Census Travel to Work data to the vehicle trip generation figures in **Table 6.2** on the basis of car drivers having a mode share of 67%.

Table 6.5: Residential Multi-Modal Trip Generation

Mode	AM Peak			PM Peak		
	Arr	Dep	Total	Arr	Dep	Total
Underground	0	0	1	0	0	1
Train	6	21	27	19	10	29
Bus / coach	9	29	38	27	14	41
Taxi	0	1	2	1	1	2
Motorcycle	2	6	7	5	3	8
Driving a car / van	94	315	409	297	150	446
Passenger in a car / van	9	32	41	30	15	45
Bicycle	3	10	13	10	5	15
On foot	16	54	70	51	26	77
Other	0	1	2	1	1	2

6.4. Summary

- 6.4.1. It is evident from comparing the trip generation predictions associated with the 2019 application in **Table 6.1** with those in **Table 6.2** that the number of vehicle trips would be substantially less with the currently proposed quantum of development. It should also be noted that **Table 6.2** does not account for the measures that are proposed to be provided to encourage and facilitate active and sustainable travel. Particularly the proposals to extend an existing bus service to route through the site, which Arriva have confirmed they would still be supportive of.
- 6.4.2. As a result of the above, Esquire Developments would seek to agree suitable trip rates to be used to assess the proposed development with MC to account for the nature of the site and the facilities /

measures proposed to encourage residents to travel by active and sustainable modes of transport. This would also involve taking a vision-led approach to the development and how it is assessed, including a review of MC 2024 proposed vehicle trip forecasting.

7. Trip Distribution and Traffic Assignment

- 7.1.1. It is evident from the review of the 2019 planning application submission, post-submission and Inquiry documents that assessment of the traffic impact of development on this site will need to be considered as part of a comprehensive appraisal. This will most likely involve using a MC strategic model such as the MAM rather than isolated junction modelling given that this was the main point of contention between MC and the applicant of the 2019 application, in addition to the trip rates being used.
- 7.1.2. Given the approximate 36% reduction in the number of dwellings proposed from that which was applied for in the 2019 application, the reduction in the number of vehicle trips generated by the development is, as explained in Section 6, substantial. As a result, the associated impact on the local highway network will also be reduced compared to the 2019 scheme.
- 7.1.3. It is also noted that MC acknowledged in their PoE for the previous application that *“it could be possible to reduce the impact of the development on the road network so as not to be severe if additional mitigation were to be secured”*. Given this comment was made based on the previous scheme, and the reduced quantum of development now being proposed, it is considered that development of the site will be feasible. A Transport Assessment will be prepared to support a planning application to confirm this.
- 7.1.4. It is clear that the primary locations / junctions of concern to MC from the 2019 application are located in subnetwork 2 of the MAM, which comprises the A289, A2 and A278. MC considered that the development would result in a severe impact on the operation of the seven junctions shown in **Figure 7.1**.

Figure 7.1: Junctions of concern to MC in relation to development impact of 2019 application



Source: © OpenStreetMap contributors with Pell Frischmann annotations

- 7.1.5. The reduced scale of development now being proposed will reduce the number of vehicle trips that would be generated by the development when compared to the 2019 scheme, as set out in Section 6 of

this report. However, it is acknowledged that measures may still be required at key local junctions on the highway network in order to mitigate the impact of the proposed development.

- 7.1.6. New baseline traffic volumes would be determined prior to the submission of any new planning application for development of the site and traffic modelling would subsequently be undertaken to assess the impact on the local highway network. The scope and methodology for this work would be discussed and agreed with MC prior to any surveys or traffic modelling being carried out.
- 7.1.7. It is considered that the approach taken to the development of this site and the way that it should be assessed will be fundamentally different to the approach taken for the previous application. This is likely to involve taking a vision and validate approach, in line with the focus of the consultation draft of the NPPF, 31st July 2024. As a result, whilst mitigation measures may still be required to off-site junctions, the focus will be on active and sustainable transport and prioritising this to reduce the number of vehicle trips that will be generated by the development.
- 7.1.8. A Framework Travel Plan (FTP) will be required to be submitted as part of any future planning application for development of this site. The development of the FTP will involve working alongside MC and bus operators to agree on appropriate measures and mode share targets. This will account for current aspirations to encourage sustainable travel and seeking a new approach for the future.

8. Sustainable Transport and Mitigation Strategy

8.1. Overview

- 8.1.1. The proposed development site is well-situated to capitalise on the existing connectivity offered in Rainham, Gillingham and the surrounding areas, providing a logical connection to the existing built-up areas around it. The site provides connectivity to existing infrastructure such as NCN Route 1 and other local cycle routes, in addition to the surrounding pedestrian network into Rainham and Gillingham.
- 8.1.2. The proposed development seeks to establish sustainable travel behaviours from the outset as this is the point at which new occupants are most open to adopting new travel habits, 'baking in' sustainable travel behaviours from the start. The necessary supporting active travel infrastructure and connectivity will be in place at or prior to initial occupation and this ensures that active travel is the natural choice of mode for local journeys. The measures 'designed in' to the proposed development will be supported by a Framework Travel Plan (FTP).
- 8.1.3. The FTP's primary objective will be to engage with and encourage both residents and visitors to use more sustainable ways of travelling to / from the development site through more effective promotion of active modes. This will minimise the impact of the development on the surrounding highway network. This is directly aligned with the transport vision for the proposed development. This objective is to be achieved through the series of related sub-objectives:
- **Sub-objective 1:** To increase resident and visitor awareness of the advantages and availability of sustainable / active modes of transport;
 - **Sub-objective 2:** To promote the health and fitness benefits of active travel to residents and visitors;
 - **Sub-objective 3:** To introduce a package of physical and management measures that will facilitate resident and visitor travel by sustainable modes; and
 - **Sub-objective 4:** To reduce unnecessary use of the car, particularly for single occupancy, when travelling to and from the Site.

8.2. Pedestrian and Cycle Connectivity

- 8.2.1. **Figure 8.1** provides an indication of the off-site connectivity for the proposed development. This demonstrates that a number of routes are currently available within the vicinity of the site.

Figure 8.1: Off-Site Pedestrian and Cycle Connectivity



- 8.2.2. In order to maximise the accessibility of and within the site by walking, wheeling, cycling, public transport and shared travel, the internal layout will need to be designed to prioritise movement by these modes over cars. As such, the internal street layouts and active travel routes will be designed to accommodate this, and to provide connections to routes off-site to facilitate access to facilities and destinations in the wider area by sustainable modes. This will enable connections to be made from all directions within the site to coincide with potential desire lines. This will include a route within the site that will run along the northern side of the rail line, providing connections between the three locations where crossing the rail line is possible.
- 8.2.3. In addition to the above, facilities will be provided within the site as part of the development including bicycle storage / parking and mobility hubs. These facilities will help to ensure that the vision of having active and sustainable travel at the core of the development is achievable.
- 8.2.4. It is currently envisaged that an arrival square will be provided in the northern part of the site, which would include the main mobility hub. Whilst specific details of what might be provided within the main mobility are yet to be confirmed, it is expected to include:
- Electric Car Club Vehicle with plug in charge point;
 - Electric Bike Hub;
 - Bicycle Lockers / Stands;
 - Bicycle Repair Stand and Bicycle pump;
 - Information terminal with touch screen (including summary on public transport ticketing, way finding and walk distances);
 - Electric bicycle docking station and bicycles.
- 8.2.5. There is also potential for a café or co-working space to be provided at the mobility hub.
- 8.2.6. Secondary mobility hubs would then be provided in the southern part of the site to ensure sufficient coverage is achieved for all residents within the development site to be able to access facilities that will encourage travel by active and sustainable modes. The aim would be to have a mobility hub within 400m of all properties within the development site.

- 8.2.7. Provisions for pedestrians and cyclists will also be made at the proposed vehicle access points.
- 8.2.8. Esquire Developments will also seek to investigate potential improvements that could be made to existing routes off-site in order to enhance active travel links and connectivity in the area. This to include the route along Lower Rainham Road to the west of Pump Lane, the PRow that connect to NCN Route 1 from Lower Rainham Road. There may also be scope to provide enhancements to the existing footbridges over the rail line from Lower Bloors Lane and Lower Twydall Lane, to better accommodate cyclists.
- 8.2.9. All of the above would be discussed with MC, and also Active Travel England (ATE), as part of any future planning application for development of the site.

8.3. Public Transport

- 8.3.1. There are a number of existing bus stops located within the vicinity of the site. Regular services run to and from these stops routing through Lower Rainham and providing links to towns and cities further-a-field.
- 8.3.2. As noted in Section 4 of this report, the applicant of the previous scheme had discussed the potential for the existing bus service 1, which currently terminates at The Strand, to be extended to continue along Lower Rainham Road into the development site to the north. On 14th August 2024 we obtained confirmation from Arriva that they would still be supportive of extending a bus service into this site if development were to come forward. Correspondence confirming this is provided at **Appendix B**.
- 8.3.3. The exact details for this bus service extension and funding requirements would be discussed and agreed as part of the planning application process for the development of the site. However, the principle of routing a service through the site will substantially help to achieve the vision for the development and encourage residents to travel by sustainable modes of transport.

8.4. Highway Mitigation

- 8.4.1. As discussed in Sections 6 and 7 of this report, it is evident that the number of trips expected to be generated by the proposed development is substantially less than the predictions for the 2019 scheme given the reduced quantum of development proposed. The impact that the development will have on the local highway network is therefore anticipated to be less significant than the previous scheme.
- 8.4.2. It is also noted that MC acknowledged in their PoE for the previous application that *“it could be possible to reduce the impact of the development on the road network so as not to be severe if additional mitigation were to be secured”*. This statement was based on a much higher level of vehicle trip generation than will be generated by the reduced scale of proposed residential development. Therefore, this, coupled with the substantial sustainable travel improvements proposed, will enable a more accessible and viable development to be achieved.
- 8.4.3. As part of the previous application a number of highway mitigation schemes were proposed, which comprised the following:
- **Lower Rainham Road/Yokosuka Way/Gads Hill roundabout:** widening of the eastern, Lower Rainham Road approach to provide a two-lane entry with kerb realignments on the southern side of the road and associated amendments to the central splitter island, plus appropriate destination markings to allow for two lanes of right-turning traffic from the eastern arm.
 - **A2/Will Adams Way/Ito Way roundabout:** revised lane markings to accommodate three lanes of traffic on the southern circulatory carriageway.
 - **Bloors Lane/A2 London Road/Playfootball signalised junction:** additional ahead lane on the eastbound approach.
 - **Bowaters Roundabout:** reconfiguration of the Toucan crossing to the east of the roundabout to include staggered refuge island, revised signal timings and additional lane capacity on the roundabout through new lane markings.
 - **Otterham Quay Lane/Meresborough Road/A2 signalised junction:** revised timings.
 - **Pump Lane rail underbridge:** revised signal shuttle arrangement.

- 8.4.4. The requirements for any mitigation schemes will be determined through assessment of the development impact as part of a new planning application. Esquire Developments will identify schemes to mitigate the impact of the development where required, which could include some or all of the mitigation schemes identified above that were proposed by the applicant of the previous application.
- 8.4.5. Alternatively, it may be the case where MC will have identified improvement schemes at specific locations on the network in order to mitigate the cumulative impacts of planned growth associated with the emerging Local Plan. In this instance, it is likely that Esquire Developments would provide a contribution towards the improvement scheme(s) based on the impact of the development on individual junctions.
- 8.4.6. This appeared to be the case for the previous application in relation to the impact on Junction 4 of the M2. National Highways (NH) had confirmed they saw no reason to prevent planning permission being granted on the basis that the applicant would provide a proportional and appropriate contribution towards the improvements at the junction to mitigate the impacts of the proposed development. The improvement scheme was developed by NH.
- 8.4.7. Given that it was only Junction 4 of the M2 that NH had concerns with in relation to the impact of the previous development proposals on the Strategic Road Network (SRN), it is reasonable to assume that this would remain the case as part of any future planning application for development of this site. However, the impact of the development on the SRN is likely to be less significant than the previous scheme as a result of the reduced quantum of the development proposed. Therefore, it is expected that any impact on the SRN will still be focused on Junction 4 of the M2 and that any mitigation required from Esquire Developments would be provided through a proportional contribution towards the improvement scheme already identified by NH.

9. Summary

- 9.1.1. It is evident from the review of the 2019 planning application submission, post-submission and Inquiry documents that many of the requirements to achieve agreement in relation to transport and highways aspects were indeed agreed for the previous application. Only one of the transport and highway reasons for refusal was upheld, being Reason 5 in relation to the development resulting in a severe impact on the highway network. It is evident that the focus of this was the impact on junctions in one part of the MAM.
- 9.1.2. Given the approximate 36% reduction in the number of dwellings proposed from that which was applied for in the 2019 application, the reduction in the number of vehicle trips generated by the development will be significant. As a result, the associated impact on the local highway network will also be reduced compared to the 2019 scheme.
- 9.1.3. New baseline traffic volumes would be determined prior to the submission of any new planning application for development of the site and traffic modelling would subsequently be undertaken to assess the impact on the local highway network. The scope and methodology for this work would be discussed and agreed with MC prior to any surveys or traffic modelling being carried out.
- 9.1.4. Esquire Developments would seek to agree suitable trip rates to be used to assess the proposed development with MC to account for the nature of the site and the facilities / measures proposed to encourage residents to travel by active and sustainable modes of transport. This would also involve taking a vision-led approach to the development and how it is assessed. It is expected this would follow the principles set out within this document which show a much lower vehicle trip generation than the previous, larger site proposal.
- 9.1.5. Also to be considered is the suggested changes to the NPPF with the consultation draft of the NPPF, 31st July 2024, placing a particular focus on the vision and validate approach and that a severe impact should only apply if this is met in all tested scenarios. Whilst the changes to the NPPF have not yet been adopted, it is clearly the focus of how new developments should be assessed. It would appear therefore that the currently proposed scheme is likely to meet this test.
- 9.1.6. The requirements for any mitigation schemes will be determined through assessment of the development impact as part of a new planning application. Esquire Developments will identify schemes to mitigate the impact of the development where required, which could include some or all of the mitigation schemes identified above that were proposed by the applicant of the previous application.
- 9.1.7. Alternatively, it may be the case where MC will have identified improvement schemes at specific locations on the network in order to mitigate the cumulative impacts of planned growth associated with the emerging Local Plan. In this instance, it is likely that Esquire Developments would provide a contribution towards the improvement scheme(s) based on the impact of the development on individual junctions.
- 9.1.8. It is acknowledged that the site access arrangements proposed for all modes as part of the 2019 planning application submission have been accepted by MC. However, in order to maximise the accessibility of and within the site by walking, wheeling, cycling, public transport and shared travel, the internal layout will need to be designed to prioritise movement by these modes over cars. As such, the internal street layouts and active travel routes will be designed to accommodate this, and to provide connections to routes off-site to facilitate access to facilities and destinations in the wider area by sustainable modes. This will involve engagement with both the Landscape and Highways teams at MC during the planning process to agree on suitable arrangements that will help to achieve the vision of having active and sustainable travel at the core of the development.
- 9.1.9. Esquire Developments will also seek to engage further with Arriva and MC to discuss the details and requirements for the proposals to extend an existing bus service to route through the site, which Arriva have confirmed they would still be supportive of. This will involve discussions on routing, infrastructure requirements and funding mechanisms.

- 9.1.10. A review of existing walking and cycling routes has shown that the site can be easily integrated into the local pedestrian / cycling network offering the opportunity for sustainable travel around the local area. It is also evident that the site is located in proximity to multiple existing amenities, including schools, GP surgeries, transport services, shops and leisure facilities including open space / country parks. The sites proximity to the Riverside Country Park is a particular asset of this site given that the ease of access, by foot and cycle, provides residents with substantial health and wellbeing benefits.
- 9.1.11. The close proximity of the development to local services and amenities provides a genuine alternative to car-based travel to and from the site, and therefore delivers opportunities to reduce the impact of the proposed development on the local highway network.
- 9.1.12. Esquire Developments will also seek to investigate potential improvements that could be made to existing routes off-site in order to enhance active travel links and connectivity in the area. This will include the route along Lower Rainham Road to the west of Pump Lane, the PRoW that connect to NCN Route 1 from Lower Rainham Road. There may also be scope to provide enhancements to the existing footbridges over the rail line from Lower Bloors Lane and Lower Twydall Lane, to better accommodate cyclists.
- 9.1.13. All of the above would be discussed with MC, and also Active Travel England (ATE), as part of any future planning application for development of the site.
- 9.1.14. Ultimately, a Transport Assessment summarising all of the above would need to be produced to support a new planning application for development of the site. The scope of the assessment would be discussed and agreed with MC.
- 9.1.15. A Framework Travel Plan would also be produced, which will provide a long-term travel strategy for the proposed development, and to encourage residents, employees and visitors of the proposed development to travel by sustainable modes, as opposed to car-based travel. This will also include mode share targets and details on how the plan will be implemented and the targets monitored.
- 9.1.16. The outcomes of this report identify that development of the Rainham Parkside Village site is deliverable, viable and can be achieved in alignment with National (both existing and consultation versions) and Local Policy. Therefore, it is considered that the site is appropriate for allocation in the emerging Medway Local Plan.

Appendix A – Indicative Masterplan

Primary School 3ha

Care Home 0.6ha

Local centre 0.3 ha

Open space 16.2 ha 30% of site area

Including Children's Nursery, Community Hub, Healthcare Hub and Mobility Hub

- Local Centre 0.3 ha
- School 3 ha
- Care Home 0.6 ha
- Open space 15.4 ha

Approx 800 new homes - 31.7 ha

- Approx 200 homes at 20 dph
- Approx 274 homes at 25 dph
- Approx 326 homes at 30 dph

Site Area
51 Hectares

Appendix B – Arriva Correspondence

[REDACTED]

From: [REDACTED]
Sent: 14 August 2024 07:33
To: Dr Chris Osowski
Cc: Adam Teague; Luke Craddy; Michael Jennings
Subject: RE: Rainham Medway - Pump & Bloors Farm Bus Extension

Good Morning Chris

Thanks for your email.

I can confirm that Arriva would still be supportive of extending a bus service into the site if development was to happen, as per the correspondence that took place in January 2021.

Regards
Tony

From: Dr Chris Osowski [REDACTED]
Sent: Tuesday, August 13, 2024 5:30 PM
To: Tony Bull [REDACTED]
Cc: Adam Teague [REDACTED]; Luke Craddy [REDACTED]; Michael Jennings [REDACTED]
Subject: RE: Rainham Medway - Pump & Bloors Farm Bus Extension

Hi Tony

I've received an Out of Office on my email to Michael below and was hoping that it might be something you would be able to have a look at in the interim?

Happy to discuss if that would be helpful

Thanks
Chris

Dr Chris Osowski He/Him
Associate Transport Planner
5th Floor, 85 Strand
London [REDACTED]
WC2R 0DW [REDACTED]

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From: Dr Chris Osowski
Sent: Tuesday, August 13, 2024 5:12 PM
To: [REDACTED]

Cc: Adam Teague [REDACTED] Luke Craddy [REDACTED]
Subject: Rainham Medway - Pump & Bloors Farm Bus Extension

Hi Michael

Hope you're well, and that you're able to help us with the below.

We are currently working on behalf of our client to provide inputs to support Local Plan representations for a proposed development of circa 800 homes on Land at Pump Farm and Bloors Farm in Lower Rainham, Kent. An outline planning application (planning application ref: MC/19/1566) was submitted to Medway Council in June 2019 for the development of up to 1,250 dwellings on the site. The planning application was refused by MC in June 2020 and the subsequent appeal was dismissed in July 2021.

The applicant of the previous scheme had discussed the potential for the existing bus service 1, which currently terminates at The Strand, to be extended to continue along Lower Rainham Road into the development site to the north. I have attached a copy of the correspondence from January 2021 between Arriva and the Transport Consultant for the previous applicant, which confirms this. The site location is shown in Appendix A of the DTA letter in the attached correspondence. I'm hoping that this falls under your role as I think Charlton has since moved on from the company?

Given that we are supporting representations for allocation of this development site, I was wondering whether you would be able to provide confirmation on behalf of Arriva that you would still be supportive of extending a bus service into this site if development were to come forward?

Happy to discuss if need be; otherwise look forward to hearing from you.

Thanks
Chris

Dr Chris Osowski He/Him
Associate Transport Planner

5th Floor, 85 Strand
London [REDACTED]
WC2R 0DW [REDACTED]

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Appendix G

Landscape Character & Visual Amenity Study (Lloyd Bore, September 2024)



LANDSCAPE CHARACTER & VISUAL
AMENITY STUDY

ESQUIRE DEVELOPMENTS
RAINHAM PARKSIDE VILLAGE
LOWER RAINHAM, KENT

REF. NO. 6795-LLB-RP-L-0001
STATUS: S2 - INFORMATION
DATE OF ISSUE: 04.09.2024
APPROVED BY: ANDREW COX

REVISIONS	
REVISION P01	21/08/2024 Initial issue.
EVISION P02	04/09/2024 Project Title Updated

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1. INTRODUCTION

- 1.1 This document has been produced on behalf of Esquire Developments limited In relation to a potential mixed use development at Pump and Bloor Farm located in Lower Rainham.
- 1.2 Lloydbore were instructed in August 2024 to undertake a Landscape Character and Visual Amenity Study of the site and its surroundings in order to identify the relevant landscape and visual amenity issues that would need to be considered in the development of any future detailed proposals and to assess the overall capacity of the landscape to accommodate the development. .
- 1.3 The purpose of this report is to act as an evidence based for the recommendation for this site to be allocated for residential development in the emerging Gravesham Local Plan.

ABOUT THE AUTHOR

- 1.4 This report has been compiled by Andrew Cox on behalf of Lloyd Bore Ltd.
- 1.5 Andrew is a Landscape Architect and Head of Landscape Architecture at Lloyd Bore Ltd (established 1996), which is a specialist practice offering consultancy services in Landscape Architecture, Ecology and Arboriculture, based in Canterbury, Kent.
- 1.6 Andrew has many years post qualification experience in landscape architecture and landscape assessment work, including extensive involvement in Landscape and Visual Impact Assessment projects.

GUIDANCE

- 1.7 The approach adopted for this report has been informed and guided by the following:
- The Landscape Institute and Institute of Environmental Management and Assessment, Third Edition, 2013. Guidelines for Landscape and Visual Impact Assessment.

2. PLANNING POLICY CONTEXT

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)		Section 16 Conserving and enhancing the historic environment	
2.1	The Government's planning policies for England are set out in the NPPF (latest update December 2023).	2.4	With respect to the natural environment, paragraph 195 of the NPPF states that:
2.2	The following sections are considered relevant to the issues of landscape character and visual amenity in relation to the proposed site.		<i>"Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations"</i>
	Section 15 Conserving and enhancing the natural environment		
2.3	Paragraph 180 of the NPPF states that: <i>"Planning policies and decisions should contribute to and enhance the natural and local environment by:</i> <i>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);</i> <i>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;</i> <i>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;</i> <i>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</i> <i>e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and</i> <i>f) re-mediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."</i>	2.5	Paragraph 196 of the NPPF states that: <i>"Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</i> <i>a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;</i> <i>b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</i> <i>c) the desirability of new development making a positive contribution to local character and distinctiveness; and</i> <i>d) opportunities to draw on the contribution made by the historic environment to the character of a place."</i>

MEDWAY LOCAL PLAN 2003

2.6 The following current Saved Local Plan Policies are considered relevant to issues relating to landscape character and visual amenity and requiring consideration when assessing the nature of potential landscape and visual impacts result from any proposed development of the site.

POLICY S4: LANDSCAPE AND URBAN DESIGN

‘A high quality of built environment will be sought from new development, with landscape mitigation where appropriate. Development should respond appropriately to its context, reflecting a distinct local character.’

POLICY BNE1: GENERAL PRINCIPLES FOR BUILT DEVELOPMENT

‘The design of development (including extensions, alterations and conversions) should be appropriate in relation to the character, appearance and functioning of the built and natural environment by:

(i) being satisfactory in terms of use, scale, mass, proportion, details, materials, layout and siting; and

(ii) respecting the scale, appearance and location of buildings, spaces and the visual amenity of the surrounding area; and (iii) where appropriate, providing well structured, practical and attractive areas of open space.’

POLICY BNE5: LIGHTING

‘External lighting schemes should demonstrate that they are the minimum necessary for security, safety or working purposes. Development should seek to minimise the loss of amenity from light glare and spillage, particularly that affecting residential areas, areas of nature conservation interest and the landscape qualities of countryside areas.’

POLICY BNE6: LANDSCAPE DESIGN

‘Major developments should include a structural landscaping scheme to enhance the character of the locality. Detailed landscaping schemes should be submitted before development commences and should have regard to the following factors:

(i) provide a structured, robust, attractive, long-term, easily maintainable environment including quality open spaces, vistas and views; and

(ii) include planting of a size, scale and form appropriate to the location and landform, taking account of underground and over

ground services; and

(iii) include details of the design, materials and quality detailing of hard works elements such as gates, fences, walls, paving, signage and street furniture; and hedgerows, and be well related to open space features in the locality; and

(v) support wildlife by the creation or enhancement of semi-natural habitats and the use of indigenous plant material where appropriate; and

(vi) include an existing site survey, maintenance and management regimes and a timetable for implementation.’

POLICY BNE12: CONSERVATION AREAS

‘Special attention will be paid to the preservation and enhancement of the character and appearance of Conservation Areas, as defined on the proposals map.’

POLICY BNE18: SETTING OF LISTED BUILDINGS

‘Development which would adversely affect the setting of a listed building will not be permitted.’

POLICY BNE25: DEVELOPMENT IN THE COUNTRYSIDE

‘Development in the countryside will only be permitted if:

(i) it maintains, and wherever possible enhances, the character, amenity and functioning of the countryside, including the river environment of the Medway and Thames, it offers a realistic chance of access by a range of transport modes; and is either;

(ii) on a site allocated for that use; or

(iii) development essentially demanding a countryside location (such as agriculture, forestry, outdoor or informal recreation); or

(iv) a re-use or adaptation of an existing building that is, and would continue to be, in keeping with its surroundings in accordance with Policy BNE27; or

(v) a re-use or redevelopment of the existing built-up area of a redundant institutional complex or other developed land in lawful use; or

(vi) a rebuilding of, or modest extension or annex to, a dwelling; or

(vii) a public or institutional use for which the countryside location is justified and which does not result in volumes of traffic that would

damage rural amenity.’

POLICY BNE33: SPECIAL LANDSCAPE AREAS

‘Development within the North Downs and the North Kent Marshes special landscape areas, as defined on the proposals map, will only be permitted if:

(i) it conserves and enhances the natural beauty of the area’s landscape; or

(ii) the economic or social benefits are so important that they outweigh the county priority to conserve the natural beauty of the area’s landscape.’

POLICY BNE34: AREAS OF LOCAL LANDSCAPE IMPORTANCE

‘Within the Areas of Local Landscape Importance defined on the Proposals Map, development will only be permitted if:

(i) it does not materially harm the landscape character and function of the area; or

(ii) the economic and social benefits are so important that they outweigh the local priority to conserve the area’s landscape.

Development within an Area of Local Landscape importance should be sited, designed and landscaped to minimise harm to the area’s landscape character and function.

POLICY BNE38: WILDLIFE CORRIDORS AND STEPPING STONES

‘Development should, wherever practical, make provision for wildlife habitats, as part of a network of wildlife corridors or stepping stones.

POLICY BNE43: TREES ON DEVELOPMENT SITES

‘Development should seek to retain trees, woodlands, hedgerows and other landscape features that provide a valuable contribution to local character.’

POLICY BNE47: RURAL LANES

‘Development served by, and/or affecting, the important rural lanes defined on the proposals map will only be permitted where there is no adverse effect upon the value of the lane in terms of its landscape, amenity, nature conservation, historic or archaeological importance.

Where alterations to the carriageway definition or boundaries of rural lanes is necessary, the use of natural, locally distinctive materials

such as grass banks, stonesetts and hedging will be required. The use of urbanising features such as raised concrete kerbstones, fencing and walls should be avoided unless these are absolutely essential for structural or safety reasons.

POLICY L4: PROVISION OF OPEN SPACE IN NEW RESIDENTIAL DEVELOPMENTS

‘Where there is a proven deficiency, residential development proposals shall make open space provision, within an agreed timescale, in accordance with the following:

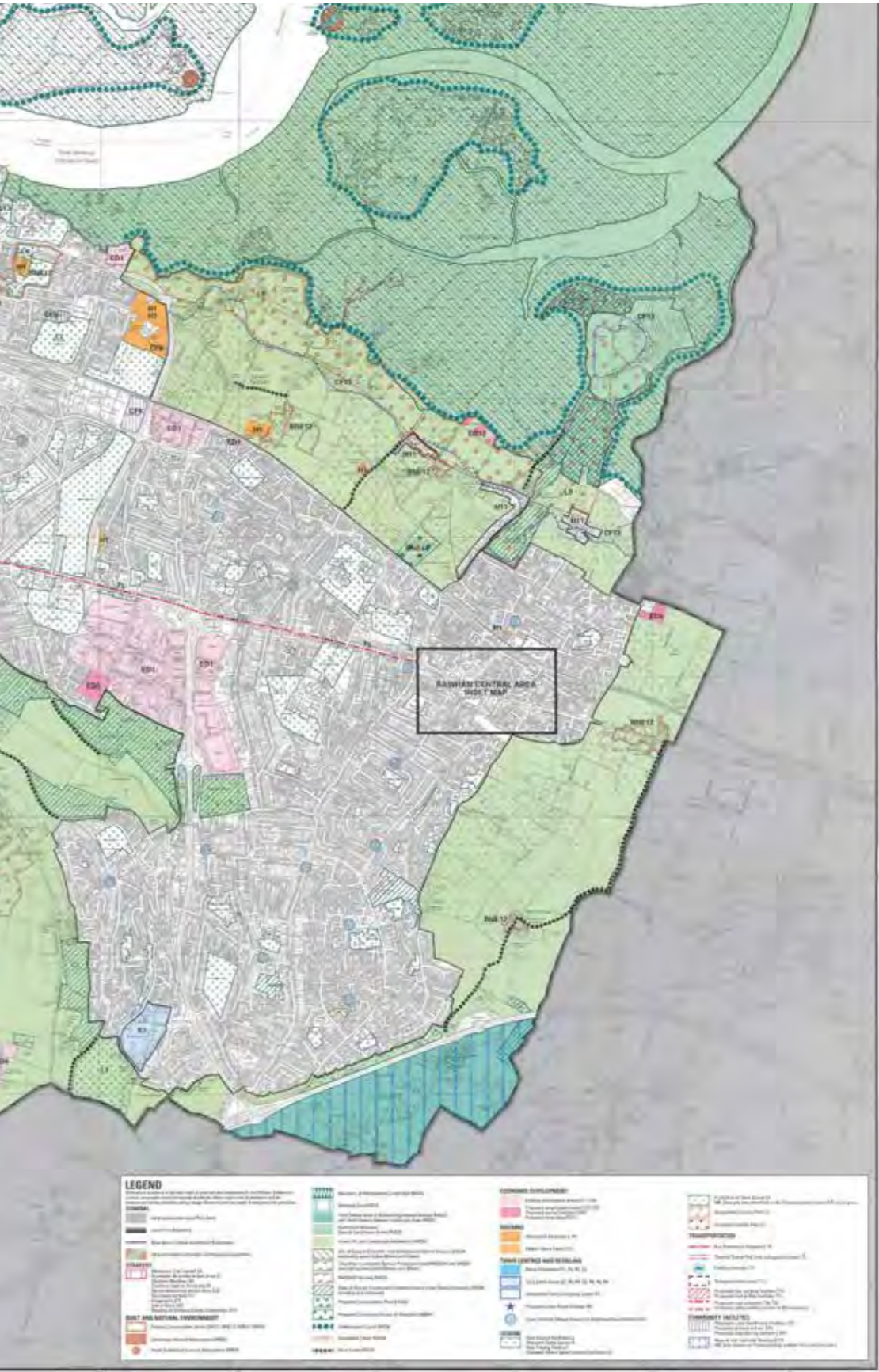
- (i) residential development likely to be occupied by 100 people or more shall include well located local open space for formal recreation on-site at a standard equivalent to 1.7 hectares per 1,000 population and open space for children’s play and casual recreation on-site at a standard equivalent to 0.7 hectares per 1,000 population. Provision of some or all of the formal open space off-site or the improvement or extension of an existing off-site facility will be permitted where the council is satisfied that this would be a better alternative;*
- (ii) residential developments likely to be occupied by between 50 and 100 people should include well located local open space for children’s play and casual recreation on-site at a standard equivalent to 0.7 hectares per 1,000 population;*
- (iii) in small residential developments likely to be occupied by less than 50 people, contributions will be sought towards the provision of children’s play and casual recreation which is fairly and reasonably related in scale and kind to the development proposal. Such contributions will only be sought where provision can be made in a location close to, and easily accessible from, the development and would be of direct benefit to the occupiers.*

In the case of sheltered housing and special needs housing for the elderly, formal open space and children’s play/casual space will not be required. Informal open space provision will be sought on-site in lieu of the formal open space requirement.

POLICY L10 : PUBLIC RIGHTS OF WAY

Development which would prejudice the amenity, or result in the diversion or closure, of existing public rights of way will not be permitted, unless an acceptable alternative route with comparable or improved amenity can be provided.

Fig. 1: Medway Local Plan 2003 Extract (not to scale)



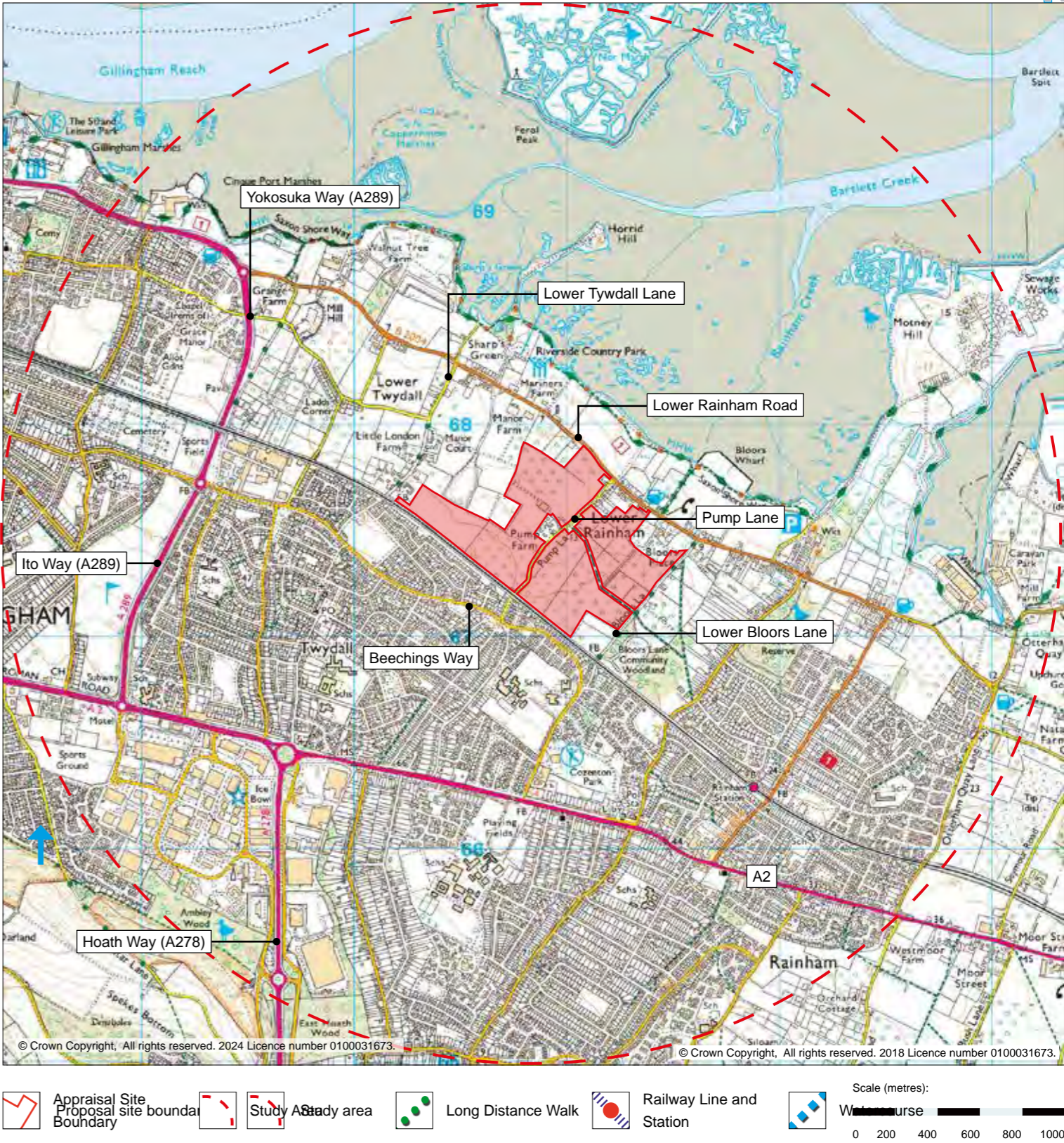
3. BASELINE LANDSCAPE MAPPING

THE SITE

Description

- 3.1 The site is located north-west of Rainham and east of Gillingham and south of the River Medway, Kent. It covers approximately 48 hectares and is irregular in shape, bordered by Lower Rainham Road to the north-east and the railway line between Rainham and Gillingham stations. Lower Bloors Lane runs alongside part of the south-eastern boundary of the site and Lower Twydall Lane is to the north-west.
- 3.2 Pump Lane bisects the site, running from Lower Rainham in the north-east towards Beechings Way in the south-west, which is on the southern side of the railway line. There is a cluster of existing residential development located broadly in the central part of the site, although outside the proposed development area. To the north-west of this, within the proposal site is Pump and Bloors Farm which is an agricultural holding consisting of two main agricultural buildings and seasonal workers' caravans.
- 3.3 The site is predominantly commercial orchards with narrow grass strips between rows of apple trees and wider grass verges varying in width between 5-10m around the margins of the site. Grassland areas are intensively managed and mown. The hedgerows and hedgerow trees along the site boundaries are generally species-poor hedgerows dominated by English Elm and Poplar with Ash and Elder. Tree lines are found within the site to act as windbreaks/shelter belts with species of Grey Alder and Leyland Cypress.
- 3.4 Local rural lanes close to the sites are often bounded by mature vegetation and hedge banks.
- 3.5 Within the local study area, there are several large areas of mixed deciduous woodland some of which are designated as Ancient Woodland. Ambley Wood and East Hoath Wood both to the south of the site fall within this designation. Medium woodland blocks are to be found at Berengrave Nature Reserve and Bloor's Lane Community Woodland, both to the south-east of the site.
- 3.6 Large-scale commercial orchards are present across much of the site and in adjacent fields to the south-east and north-west of the site. A number of the larger agricultural fields nearby are used for growing arable crops.
- 3.7 Along the coastline, to the north of the site, vegetative cover is predominantly scrub with areas of grassland, small groups of trees and shelter belts with young woodland found at the Riverside Country Park Visitor Centre.
- 3.8 Motney Hill to the east, is a narrow peninsular extending out into the estuary includes areas of marshland, reed beds, scrub and salt marsh.
- 3.9 There is tree cover at Gillingham Golf Course and woodland infrastructure planting running alongside the A289 Ito Way and Yokosuka Way to the west of the site.

Fig. 2: Ordnance survey map indicating site location and surrounding areas



TOPOGRAPHY

Description

- 3.10 Land falls gradually from the south-west at around 100m Above Ordnance Datum (AOD), north-east towards sea level at the River Medway. The site lies broadly between the 30m and 10m contours.
- 3.11 The site topography at 5m contour intervals is indicated on **Figures 3 and 4**. This shows that there are gentle undulations across parts of the site, particularly along Pump Lane, with a slight plateau feature forming along the eastern edge.
- 3.12 There are 3 small areas along the south-western boundary of the site with the railway which are at 30m AOD, but much of the part of the site which runs to the north-east of the railway line is between 25-30m. The site slopes gradually north-east towards Lower Rainham Road, where its lowest point is just below the 10m contour.

Fig. 4: Site Topography

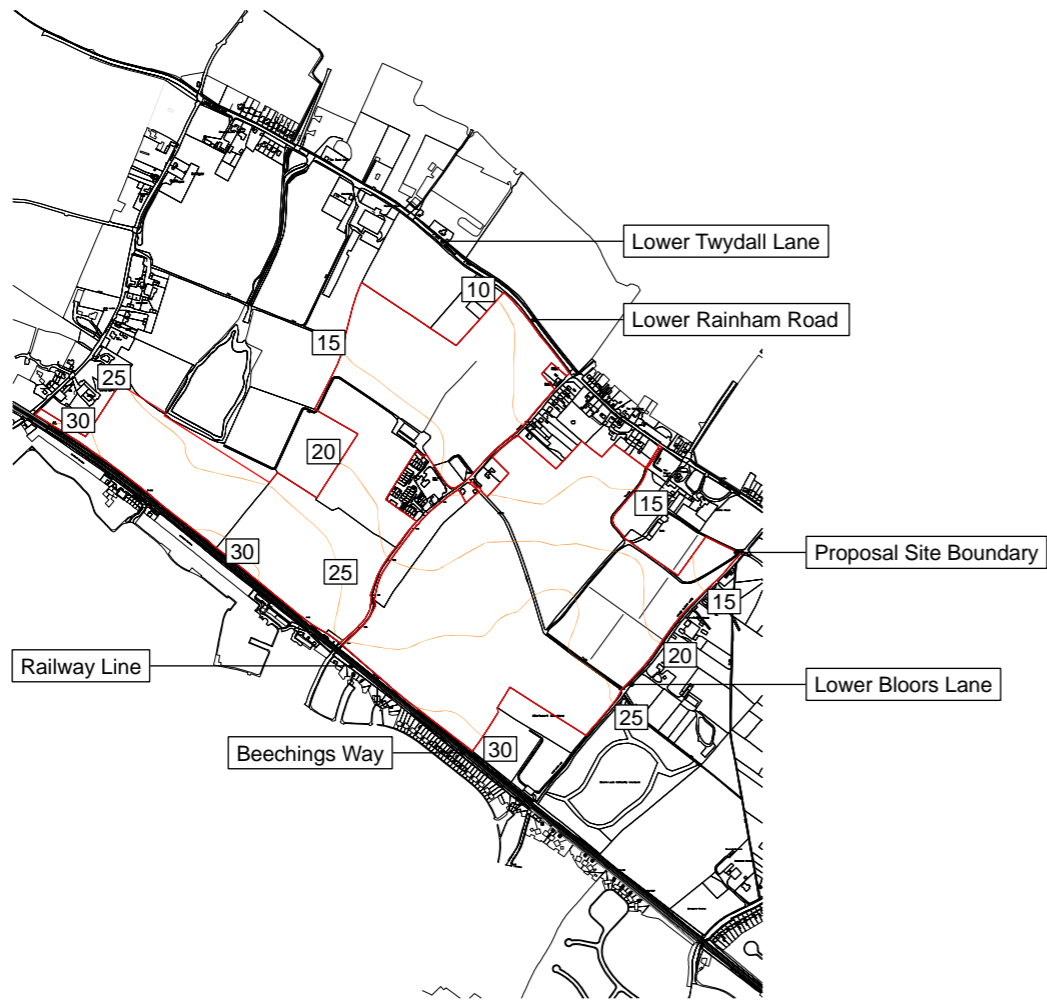
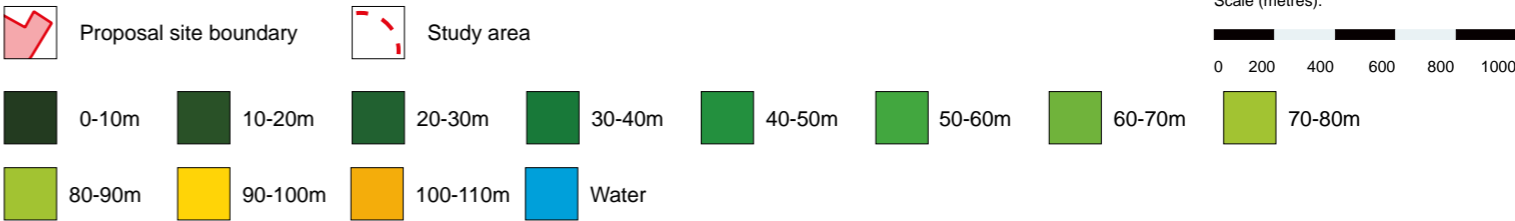
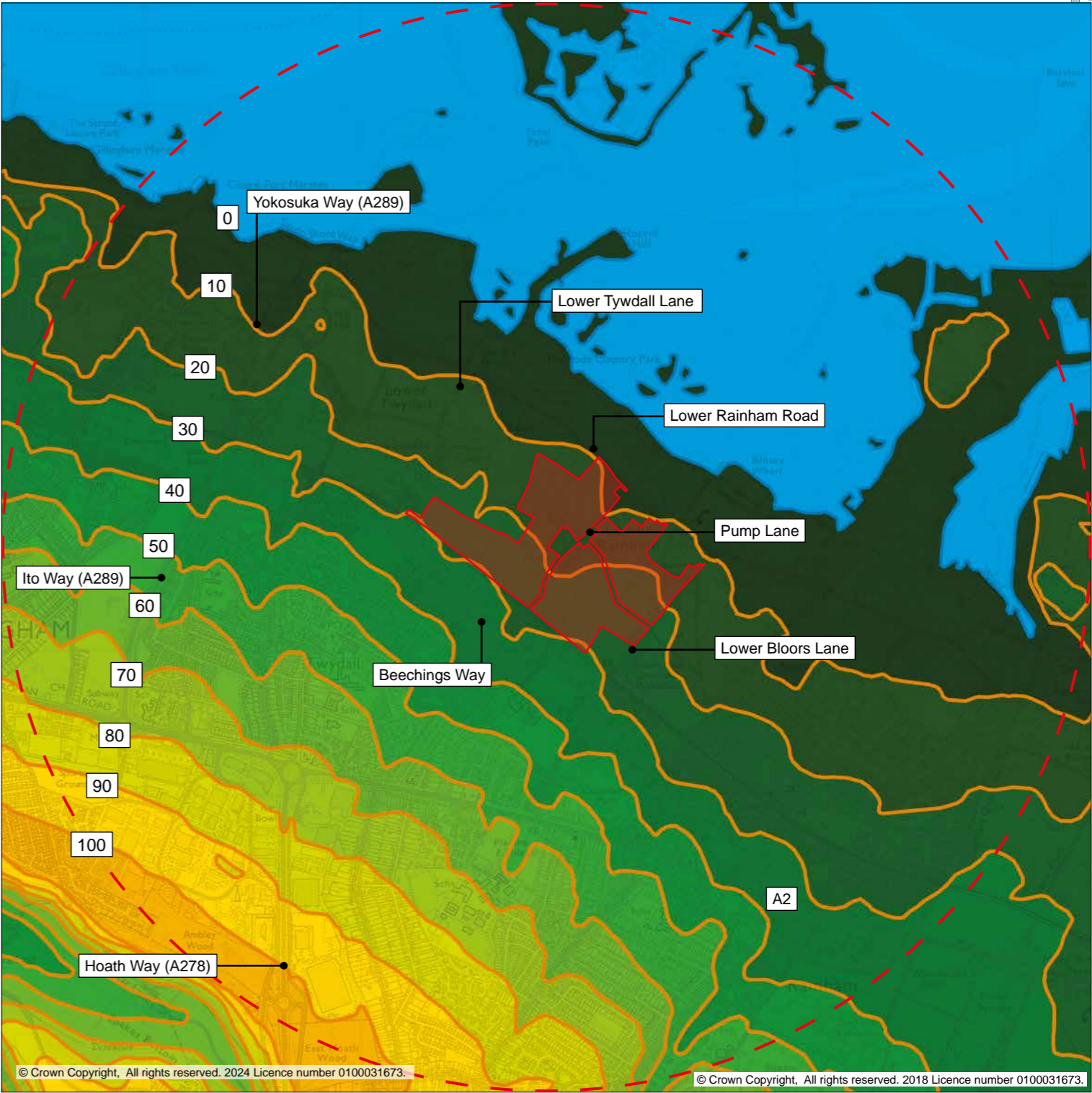


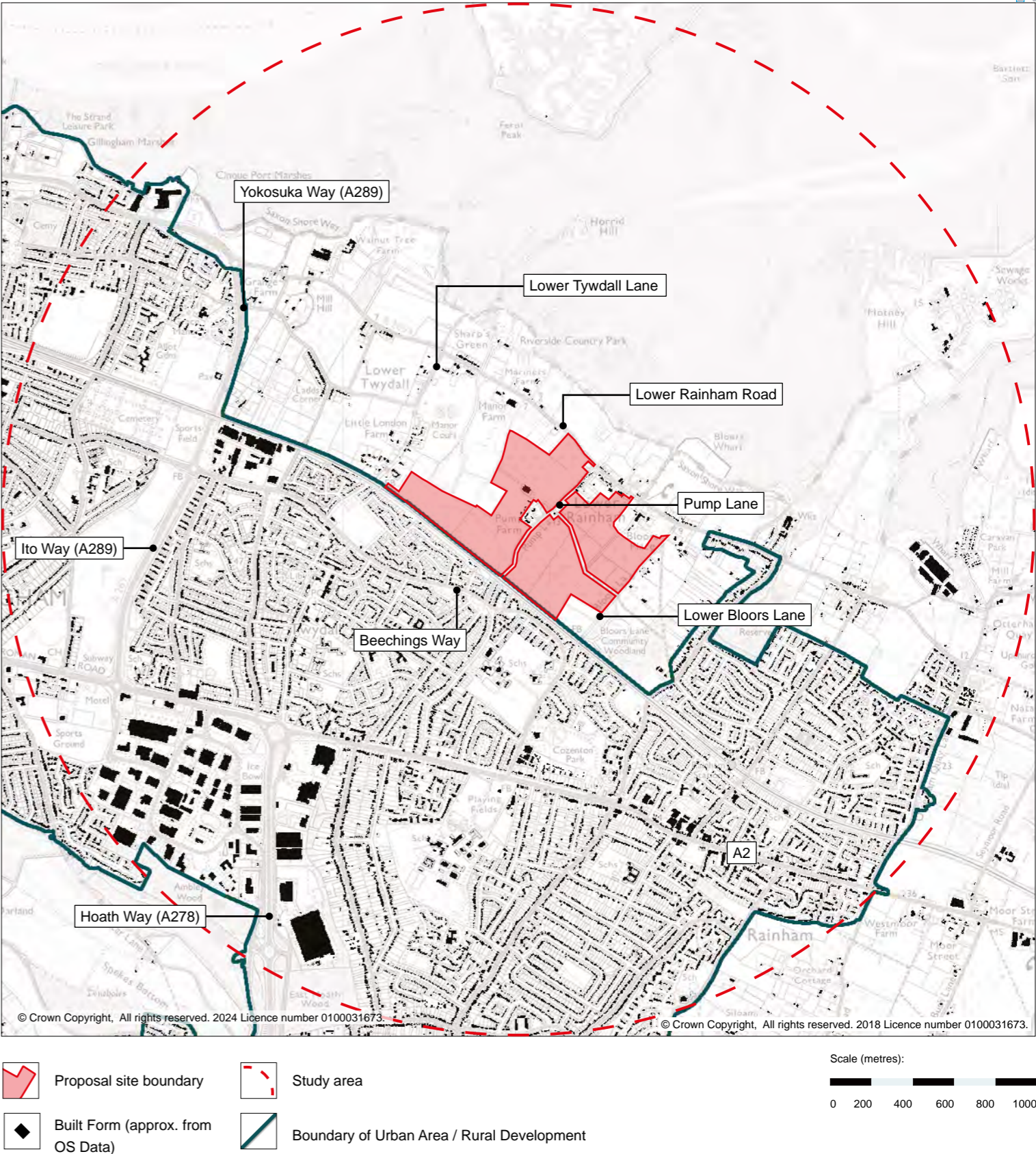
Fig. 3: Ordnance Survey map indicating Topography within the broad study area.



SETTLEMENT PATTERN / GRAIN OF DEVELOPMENT

- 3.13 The settlement pattern and grain of development within the Broad Study Area is indicated on **Figure 5**. This is shown by shading built form (approximately based on OS Data), alongside the defined urban area boundaries from the adopted Medway Local Plan.
- 3.14 There are 2 defined 'settlements' located within the study area, these include:
- Lower Rainham
 - Twydall and Rainham
- 3.15 The proposed site is located immediately adjacent to the southern and western settlement edge of Lower Rainham and along the northern edge of Twydall and Rainham urban area.
- 3.16 The sites entire southern edge boundary adjoins directly onto the settlement edge of Twydall and Rainham separated only by the railway line. The settlement extends beyond the site to the north-west up to Ito Way at Beechings Business Park and to the south-east along the railway line to Berengrave Lane. This settlement forms a large urban area extending out from the historic core of Rainham town centre with a broadening development width towards the A289 as a result of post-war infill development.
- 3.17 In terms of urban grain, the settlement of Twydall and Rainham has a predominantly singular pattern of residential development comprising of linear roads with occasional cul-de-sacs arranged off small spur roads arranged perpendicular to the roads.
- 3.18 The settlement of Lower Rainham extends beyond the boundary of the site to the south-east along Lower Rainham Road to Berengrave Lane. This small settlement is generally of a linear ribbon nature arranged along the alignment of Lower Rainham Road typically 1 plot deep.

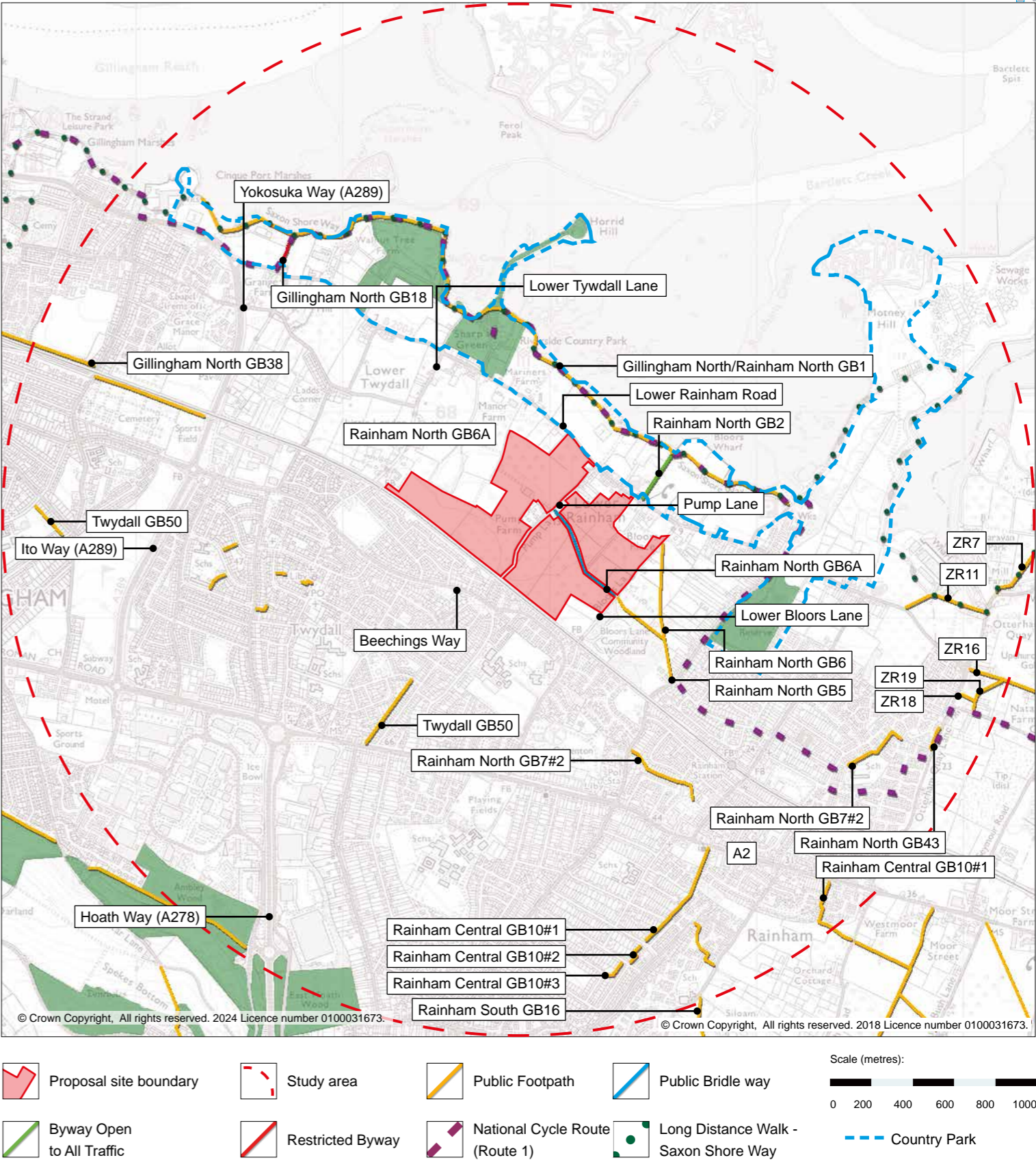
Fig. 5: Ordnance Survey map indicating extent of rural development



PUBLIC ACCESS

- 3.19 Public Rights of Way within the Broad Study Area are indicated on **Figure 6**.
- PRoW close to the site*
- 3.20 Public footpath GB5 runs north from Berengrave Lane before turning north-west towards Lower Bloors Lane. At the junction with the lane, the footpath becomes public bridle way GB6A heading north-west towards Pump Lane and the centre of the site.
- 3.21 Public footpath GB6 runs from the north-eastern end of Bloors Lane south to join public footpath GB5.
- 3.22 The long-distance footpath Saxon Shore Way runs along the coast to the north of the site. This popular walking route extends from Gravesend in Kent to Hastings in East Sussex.
- 3.23 National Cycle Route 1 runs along the shoreline to the north returning inland along Berengrave Lane heading towards Otterham Quay. This is a long distance cycle route running from Dover to the Shetland Islands.
- Other PRoW in the wider study area*
- 3.24 There are a number of short sections of public footpath within the Twydall residential area including GB38 which runs along the side of the railway line heading north-west towards Gillingham.
- 3.25 There are a number of short sections of public footpaths in and around Rainham town centre including GB7 running from Berengrave Lane towards Longley Road and GB10 heading from High Street to Arthur Road.
- 3.26 To the south-east of the site there are a number of PRoW on the edge of Otterham Quay and around Upchurch River Valley Golf Course including ZR7, ZR11, ZR16, ZR18 and ZR19.

Fig. 6: Ordnance Survey map indicating Public Rights of Way and Country Parks within the Broad Study Area.



HERITAGE ASSETS (LANDSCAPE SETTING)

3.27 Conservation Areas and Listed Buildings within the Broad Study Area are indicated on **Figure 7**.

Conservation Areas

3.28 There are two Conservation Areas close to and adjoining the proposal site; Lower Rainham Conservation Area to the north-east and Lower Twydall Conservation Area to the west / north-west.

3.29 Medway Council's website publishes no Conservation Area Appraisals for either of these Conservation Areas.

3.30 Rainham Conservation Area is within the broad study area to the south-east, but over 1km away from the nearest site boundary and separated by intervening landscape, urban development and highways infrastructure.

Listed Buildings

3.31 There are a number of Listed Buildings within the Broad Study Area, mainly concentrated in and around the Conservation Areas mentioned above.

3.32 The Listed Buildings close to the site within the Lower Rainham Conservation Area are as follows:

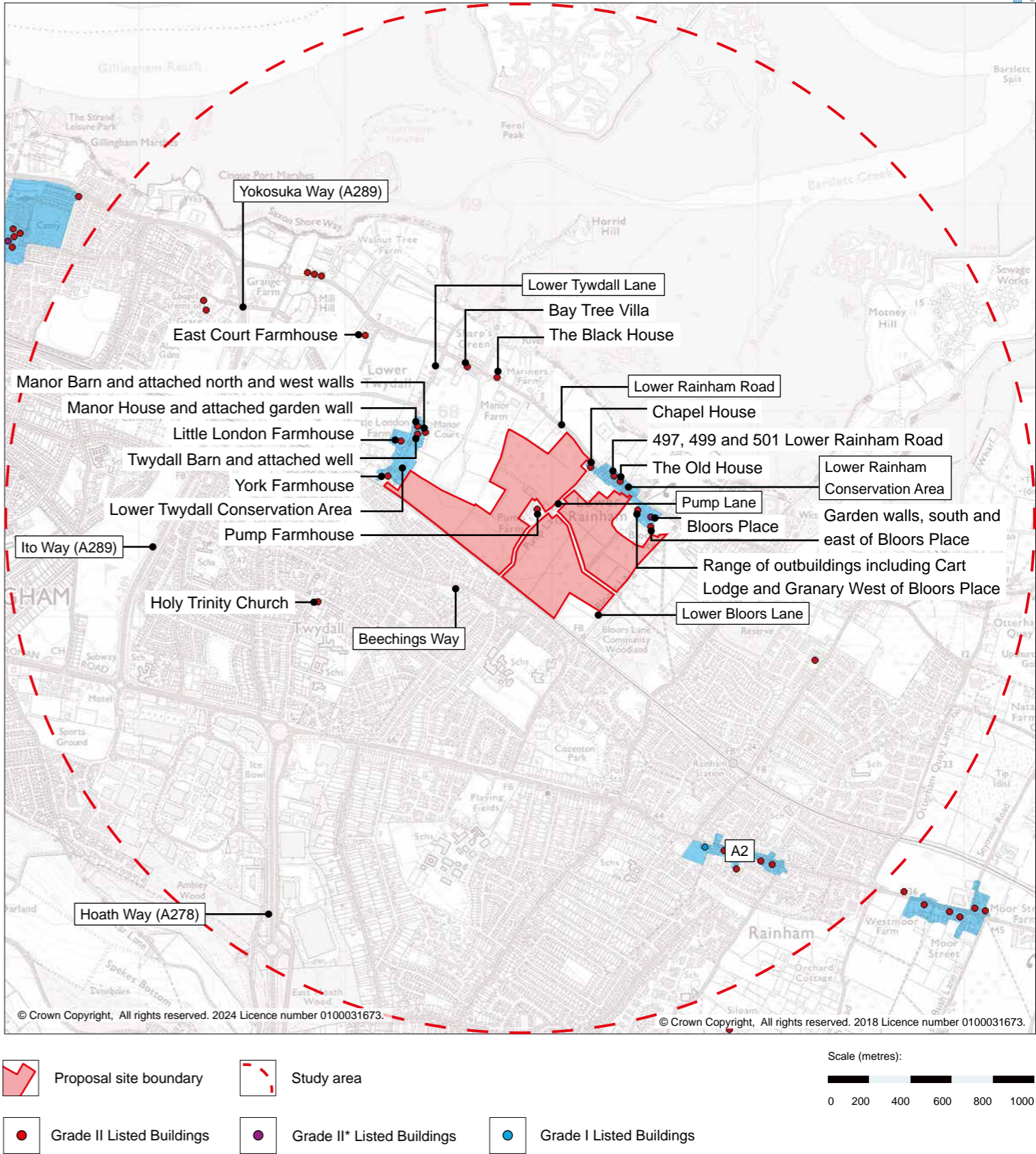
- Chapel House.
- 497, 499 and 501 Lower Rainham Road (separate listings).
- The Old House.
- Bloors Place.
- A range of outbuildings including Cart Lodge and Granary West of Bloors Place.
- Garden walls south and east of Bloors Place.

3.33 There are also two Listed Buildings to the north of the site on Lower Rainham Road; Bay Tree Villa and The Black House.

3.34 The closest Listed building to the site within the Lower Twydall Conservation Area is York Farmhouse. Beyond this to the north are Little London Farmhouse, Manor House (and attached garden wall) and Manor Barn (and attached north and west walls).

3.35 Pump Farmhouse is outside of the proposal site, but within its central apex.

Fig. 7: Ordnance Survey map indicating Conservation Areas and Listed Buildings within the Broad Study Area.



ECOLOGICAL / WILDLIFE / NATURE CONSERVATION DESIGNATIONS

3.36 Ecological, wildlife and nature conservation based designations within the broad study area are shown on **Figure 8**.

Local Nature Reserves/ Sites of Nature Conservation/Interest

3.37 There are two areas of ancient deciduous woodland within the study area Ambley Wood and East Hoath Wood both to the south of the site some 2km away. Ambley Wood is also a designated Local Nature Reserve (LNR).

3.38 The other Local Nature Reserve is Berengrave Chalk Pit to the south-east of the site. This LNR is an old chalk pit with a small lake with a reed bed which floods into an area of willow carr. The remainder of the site is woodland and mature scrub with small glades.

3.39 Ambley Wood, East Hoath Wood, Berengrave Chalk Pit and both the lower portion and the north-western tip of the Motney Hill peninsular are designated as Sites of Nature Conservation Interest.

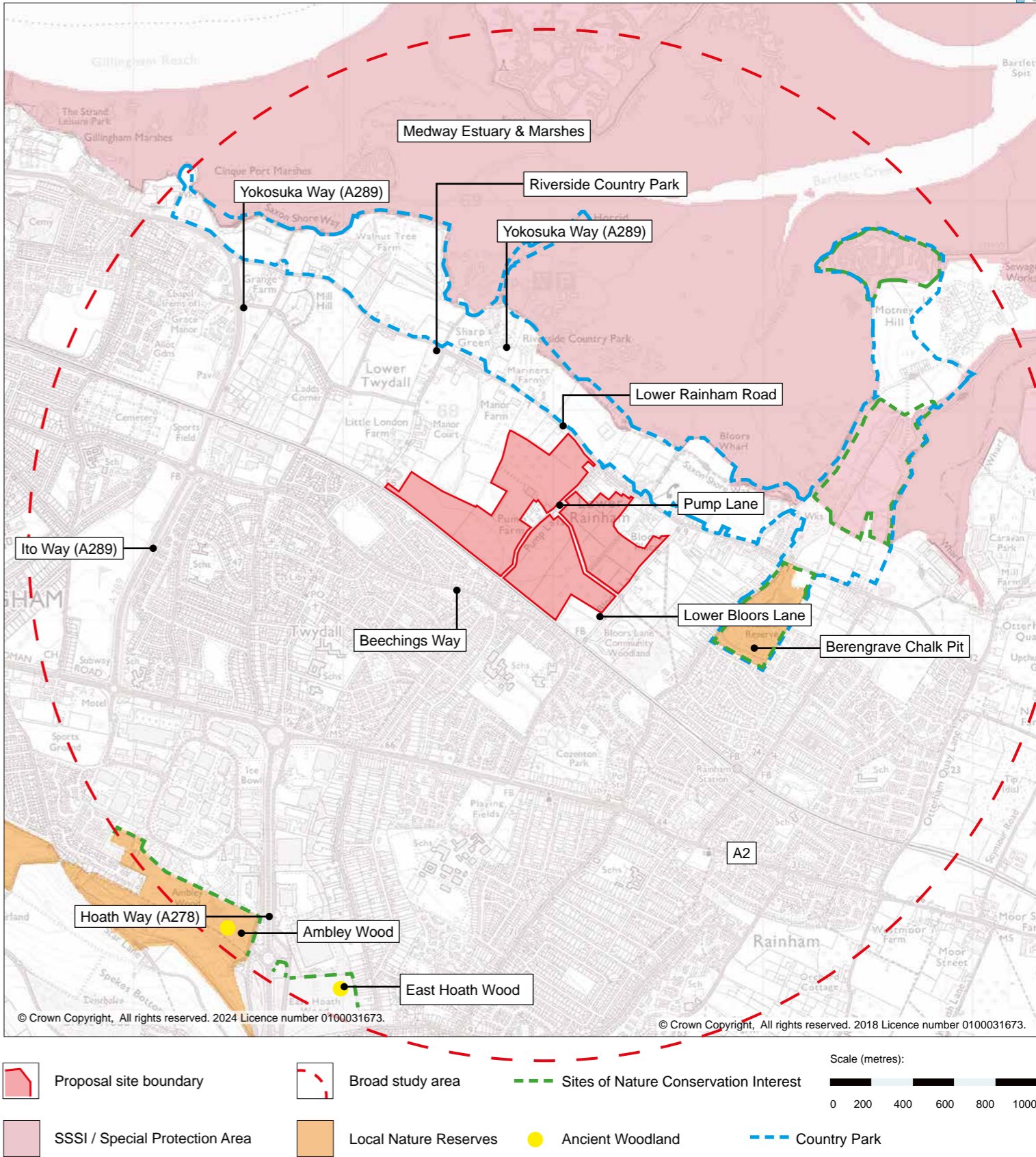
Medway Estuary and Marshes

3.40 The Medway Estuary and Marshes is designated as a Site of Special Scientific Interest (SSSI), a recognised wetland area of international importance (RAMSAR) and a defined Special Protection Areas (SPAs). The Medway Estuary and Marshes includes the lower portion of the Motney Hill peninsular to the east of the study area.

3.41 The Medway Estuary feeds into and lies on the south side of the outer Thames Estuary in Kent. It has a complex arrangement of mudflats and saltmarsh with in places areas of grazing marsh inside sea walls. The Motney Hill peninsular includes areas of rough pasture, salt marsh and reedbeds.

3.42 The complex and diverse mixes of coastal habitats support internationally important populations of wintering and passage birds and is of importance for its breeding birds.

Fig. 8: Ordnance Survey map indicating Ecological / Wildlife / Nature Conservation Designations.



4. PUBLISHED LANDSCAPE CHARACTER AREA ASSESSMENTS

NATIONAL LANDSCAPE CHARACTER AREA PROFILES - NATURAL ENGLAND

4.1 The site is covered by the following two National Landscape Characters Areas (NCAs), as shown on **Figure 9**:

- The North Kent Plain (Natural England NCA Profile 113, 2013). This covers a strip of land roughly parallel with the railway line in the south and south-western part of the site, roughly as far as Pump Farm.
- The Greater Thames Estuary NCA (Natural England NCA Profile 81, 2013). This covers the remainder of the site to the north-east of the North Kent Plain.

Description: The North Kent Plain (Natural England NCA Profile 113, 2013)

‘The North Downs are to the south of this National Character Area (NCA) and form a distinctive backdrop, with the boundary delineated between the Chalk and the Eocene deposits (although some Chalk also outcrops at Thanet). The underlying Chalk aquifer (an important source of groundwater abstraction) creates a functional link to surrounding NCAs. To the north is the alluvial Greater Thames Estuary. The area’s western boundary is defined by Inner London and the Thames Basin Lowlands.

The River Darent drains from springs in the Wealden Greensand through the North Downs, and then runs through the western part of the NCA and north into the Thames. The Medway and Stour rivers drain north through the North Downs into the NCA, the Medway running north into the sea via the Greater Thames Estuary and the Stour flowing east directly into the North Sea.

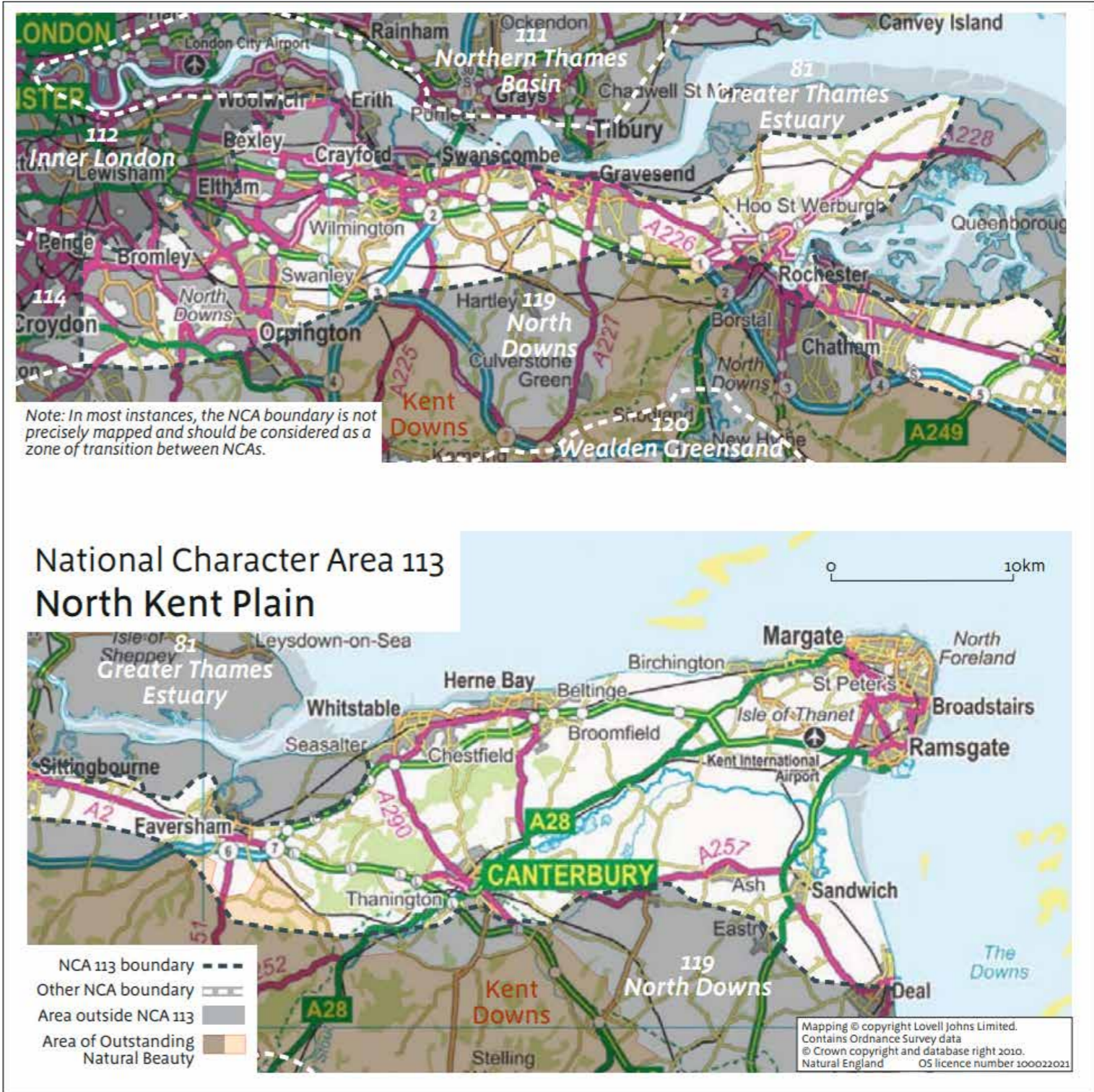
Coastal processes of sedimentation and erosion provide a functional link between this NCA and, for example, the Greater Thames Estuary NCA to the west and the North Downs NCA to the south: as such, management of the coastal frontages cannot be considered in isolation. There are differences in the coastal processes on either side of the North Foreland: the moderately strong tidal streams ensure that the sand deposits are quite mobile.

The North Kent Plain NCA is an important transport corridor, with major rail and road links connecting Kent’s coastal towns with London. These (and the area’s proximity to the capital) have resulted in numerous economic, cultural and functional links with the City of London.’

4.2 The key Characteristics of this NCA are identified as comprising

- An open, low and gently undulating landscape, characterised by high quality, fertile, loamy soils dominated by agricultural land uses.
- The area’s geology is dominated by Palaeogene clays and sands, underlain by the Chalk.
- Geologically a chalk outlier – and historically an island separated from the mainland by a sea channel – Thanet forms a discrete and distinct area that is characterised by its unity of land use, arising from the high quality fertile soils developed in thin drift deposits over chalk.
- A diverse coastline (both in nature and orientation), made up of cliffs, intertidal sand and mud, salt marshes, sand dunes and shingle beaches. Much of the coastal hinterland has been built on, and the coast itself has been modified through the construction of sea walls, harbours and piers.

Fig. 9: Ordnance survey map indicating extent of surrounding National Character Areas.



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RAINHAM PARKSIDE VILLAGE, LOWER RAINHAM, KENT**

S2 - INFORMATION

- Large arable/horticultural fields with regular patterns and rectangular shapes predominating, and a sparse hedgerow pattern.
- Orchards and horticultural crops characterise central and eastern areas, and are often enclosed by poplar or alder shelter belts and scattered small woodlands.
- Woodland occurs on the higher ground around Blean and in smaller blocks to the west, much of it ancient and of high nature conservation interest.
- The Stour and its tributaries are important features of the eastern part of the NCA, draining eastwards into the North Sea, with associated wetland habitats including areas of grazing marsh, reed beds, lagoons and gravel pits. The River Medway cuts through the NCA as it flows into the Thames Estuary.
- Other semi-natural habitats include fragments of neutral, calcareous and acid grassland, and also heathland.
- The area has rich evidence of human activity from the Palaeolithic period. Key heritage assets include Roman sites at Canterbury, Reculver and Richborough; the Historic Dockyard at Chatham; military remains along the coast; and historic parks and buildings.
- Large settlements and urban infrastructure (including lines of pylons) are often visually dominant in the landscape, with significant development around Greater London and the Medway Towns, as well as around towns further east and along the coast. Major rail and road links connect the towns with London.
- Manage and significantly enhance the area's existing broad leaved woodland cover, including the extensive internationally important ancient woodland that forms part of the Blean Complex SAC and the areas of ancient woodland that occur further west, including through the re-introduction of coppice management and the restoration of planted ancient woodland sites (PAWS), as well as restoration of small farm woodlands throughout and poplar and alder shelter belts further east, creating robust wildlife networks better adapted to climate change whilst also enhancing landscape character.
- Manage and enhance the productive agricultural landscape, including the creation of arable field margins and conservation headlands that further help to support the area's farmland bird populations, as well as through the conservation of traditional orchards characteristic of the North Kent fruit belt and the Hoo peninsula.
- Plan for a landscape-scale restoration of the fragmented wetland landscape of the Stour valley and its tributaries, achieving condition and creating wetland habitats including floodplain and coastal grazing marsh, reedbeds, fens and wet woodland throughout the Lower Stour Wetlands Biodiversity Opportunity Area (including Stodmarsh SAC) and the area identified under the Wetland Vision, to create a robust wildlife network that significantly enhances adaptation to climate change as well as landscape.
- Plan for the restoration of numerous disused and active mineral workings and landfill sites integrating them into the landscape through beneficial after-uses, including the extensive creation of semi-natural habitats (benefiting landscape and biodiversity) whilst safeguarding high quality agricultural land and soil resources, and retaining and where possible, enhancing exposures of geological importance.
- Plan for the creation of significant new landscapes that provide a framework to new and existing development and its associated infrastructure, including major transport routes such as the high-speed Channel tunnel rail link, and including areas of broad leaved woodland (where appropriate) that help to provide a screening function and significantly benefit landscape as well as biodiversity.

Landscape opportunities

- Protect the open character of the gently undulating landscape and the remaining areas of tranquillity, along with the dispersed rural settlement pattern, defined by a dense network of narrow lanes
- Protect the area's surviving historic environment that includes important Roman remains across the area and at Canterbury, Richborough and Reculver, as well as the significant military and maritime heritage assets in the west of the NCA, historic parks and traditional buildings including oast houses.
- Protect and manage the coastal habitats and features that include chalk cliffs (around Thanet), soft cliffs, intertidal sand and mud, saltmarsh (especially in Pegwell Bay), sand dunes (notably Sandwich Bay) and shingle beaches (at Minnis Bay and near Deal), including areas of international importance (Sandwich Bay and Thanet Coast SACs/SPA), promoting opportunities for natural regeneration/migration where appropriate or possible and/or creating compensation habitats in areas of managed realignment to ensure no net loss of habitats such as saltmarsh and mudflats.

Description: The Greater Thames Estuary NCA (Natural England NCA Profile 81, 2013)

'The Greater Thames Estuary National Character Area (NCA) forms the eastern edge of the London Basin, and its extensive underlying geology of London Clay provides links with the Northern Thames Basin NCA and, further west, the Inner London NCA.

The NCA lies between the North Sea and the rising ground of the adjacent North Kent Plain and Northern Thames Basin NCAs which provide a backdrop to the extensive flat open spaces of the estuary. Uninterrupted, far-reaching views out across the Thames to the opposite banks are possible from this higher ground, and industrial and historic military landmarks are highly visible in this predominantly low-lying marshy coastal landscape.

The Thames is one of the major estuaries of the eastern English coast and drains over 16,000 km² of land, from the source of the River Thames in Gloucestershire to the west, and the southern reaches of the River Medway in the High Weald of Sussex. To the north the NCA includes the estuaries of the rivers Crouch, Roach, Blackwater, Colne and Stour and the embayment (a recess in a coastline forming a bay) of Hamford Water, which together reach far into the Northern Thames Basin NCA and beyond into the South Suffolk and North Essex Claylands NCA. There is hydrological continuity between Tertiary deposits of Thanet Sands in the far west of the NCA and the underlying principal London Basin Chalk aquifer, which stretches through the Northern Thames Basin NCA and into the Chilterns NCA to the north and the North Downs NCA to the south.

Coastal processes of erosion, transportation and deposition provide a functional link between the Greater Thames Estuary NCA and the contrasting coastlines of the adjacent North Kent Plain NCA and Suffolk Coast and Heaths NCA, with littoral drift occurring southwards along the coast. The marshes were created from the material carried by the sea from the north, and a continued supply of sediment is needed to sustain them. Functional connectivity is also provided by the continuation of coastal habitats into adjacent NCAs, with the Stour, Orwell, Debden and Alde-Ore estuaries occurring on the Suffolk coastline, and large areas of grazing marsh habitat behind coastal defences in the North Kent Plain NCA.

The River Thames itself provides a major transport link to the Inner London NCA with jetties, wharfs and docks occurring throughout. An extensive network of road and rail bridges spans the NCA's western reaches, including the M25 Dartford crossing, as it follows the Thames path winding through the eastern part of Inner London. The Saxon Shore Way stretches 257 km along the Kent coastline from

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S2 - INFORMATION

Gravesend to Hastings in East Sussex, linking the North Kent Plain, North Downs, Wealden Greensand and Romney Marshes NCAs. The Thames Path National Trail follows the path of the Thames from its source in the Cotswolds, to Greenwich in the East London part of the NCA.'

Key Characteristics

- Predominantly flat, low-lying coastal landscape where extensive open spaces are dominated by the sky, and the pervasive presence of water and numerous coastal estuaries extend the maritime influence far inland.
- Grain Coastal Park on the Isle of Grain in Kent, looking across the Thames Estuary towards Southend-on-Sea, Essex. ~Eleanor Bentall/rspb-images.com
- Eastern edge of the London Basin with its underlying geology of the extensive London Clay, containing important sites for geodiversity including fossiliferous deposits, and overlain by productive loamy soils derived from intertidal alluvial muds.
- Geological contrast and variety along the coastline provided by Sheppey, a long, low island rising from a stretch of very flat marsh along the Swale Estuary in Kent with low, steep clay cliffs facing towards Essex, and Mersea Island in the Blackwater Estuary in Essex.
- Coastline of major geomorphological interest for its coastal processes. Accretion of material carried by the sea from the north recharges intertidal coastal habitats, which are subject to coastal squeeze from rising sea levels.
- Open grazing pastures patterned by a network of ancient and modern reed-fringed drainage ditches and dykes, numerous creeks and few hedges or fences, with tree cover a rarity.
- Traditional unimproved wet pasture grazed with sheep and cattle combined with extensive drained and ploughed arable land protected from floods by sea walls, with some areas of more mixed agriculture on higher ground.
- Strong feelings of remoteness and wilderness persist on extensive salt marshes, mudflats and reclaimed farmed marshland, which support internationally important plants, invertebrates and populations of breeding and overwintering birds, notably overwintering Brent geese.
- Open mosaic habitats on brownfield sites support nationally important invertebrate assemblages and key populations of rare invertebrate species.
- Distinctive landmarks of coastal military heritage including Napoleonic military defences, forts and 20th-century pillboxes.
- Some of the least settled parts of the English coast with numerous small villages and hamlets on higher ground and marsh edges reflecting medieval patterns and the coastal economy.
- Highly urbanised areas within London and on marsh edges subject to chaotic activity of various major developments including ports, waste disposal, marine dredging, housing regeneration, mineral extraction and prominent power stations plus numerous other industry-related activities.
- Increasing development pressures around major settlements and especially towards London, with urban, industrial and recreational sites often highly visible within the low-lying marshes.
- Major historical and current transport link to Inner London provided by the River Thames, with an extensive network of road and rail bridges spanning its reaches within the city.

Landscape opportunities

- Protect the open spaces and expansive skylines from intrusive development, conserving the large areas of tranquillity and remoteness that remain especially remote coastal habitats and low lying islands.
- Protect the historic settlement pattern of numerous small villages and hamlets located on higher ground reflecting the medieval layout of parishes, and ensure new development is sympathetic to the built character of these settlements.
- Protect the network of ancient reed-fringed drainage ditches and dykes that include very ancient inland patterns (for example, those of the Dengie peninsula) and regular medieval patterns by the coast,
- Protect exposures of Tertiary and Quaternary deposits in soft eroding cliffs and foreshores, including important sites for London Clay fossils and Thames gravel exposures and enhance the recreational, research and interpretation opportunities provided by internationally important fossil collecting sites.
- Protect the geomorphological processes that shape the estuary, allow natural processes to continue unimpeded, and enhance the opportunities for research, education and interpretation they provide.
- Protect the area's rich historic and archaeological associations that include Neolithic and iron-age features, and most notably a distinctive military heritage along the coastline such as Napoleonic military defences and 20th-century pillboxes, and improve interpretation and promotion of these assets to reinforce the sense of history of the estuary and connect communities with their local heritage.
- Protect key open mosaic habitats and species on brownfield sites through site protection, mitigation and habitat creation.
- Manage and significantly restore areas of coastal grazing marsh and its associated habitats, including sea walls, reedbeds, ditches and saline lagoons, re-linking fragmented habitats to create a robust wildlife network with enhanced adaptation to climate change.
- Manage estuarine habitats including intertidal sand and mudflats, salt marsh, sand dunes, shingle, shell and sand banks, and sub tidal sand and mud, supporting their adaptability to sea-level rise and maintaining opportunities for natural regeneration and allowing natural processes to continue unimpeded where appropriate, and identifying possibilities for creation of compensation habitats in other locations where they will be lost to coastal squeeze.
- Manage and enhance existing arable farmland helping to support important populations of breeding birds, notably dark-bellied Brent geese, including through the creation of arable field margins and conservation headlands.
- Plan to create new landscapes that include sustainably managed broad leaved woodlands that provide a setting to urban areas, as well as existing disused industrial land and mineral/waste sites, to significantly enhance landscape character and help to protect the tranquil and open character of the estuary.

REGIONAL LANDSCAPE CHARACTER AREA ASSESSMENT

KCC LANDSCAPE ASSESSMENT OF KENT 2004

4.3 The Landscape Assessment of Kent places the site within the Fruit Belt County LCA, with the Medway Marshes LCA to the north and north-east, as shown in **Figure 10**.

Description: Fruit Belt

'This is predominantly a rural, agricultural landscape characterised by a complex landscape pattern of orchards, shelter belts, fields of arable and pasture and horticultural crops, and divided by small blocks of woodland. Apart from the large urban area of Sittingbourne, the area contains only small, scattered villages and farm complexes which contribute to its rural character and landscape diversity. The A2 and A249 route corridors, and associated ribbon development, run through the area and have a localised urbanising effect. To the south of the A2 the gently rolling landform is punctuated by two valley systems running north south through the landscape. These main valleys are reflected by minor valley forms to the north-west and south-east creating distinct features in the landscape. To the north of the A2 the landform becomes flatter as it approaches the Swale and Medway Marshes and loses some of its distinctiveness.

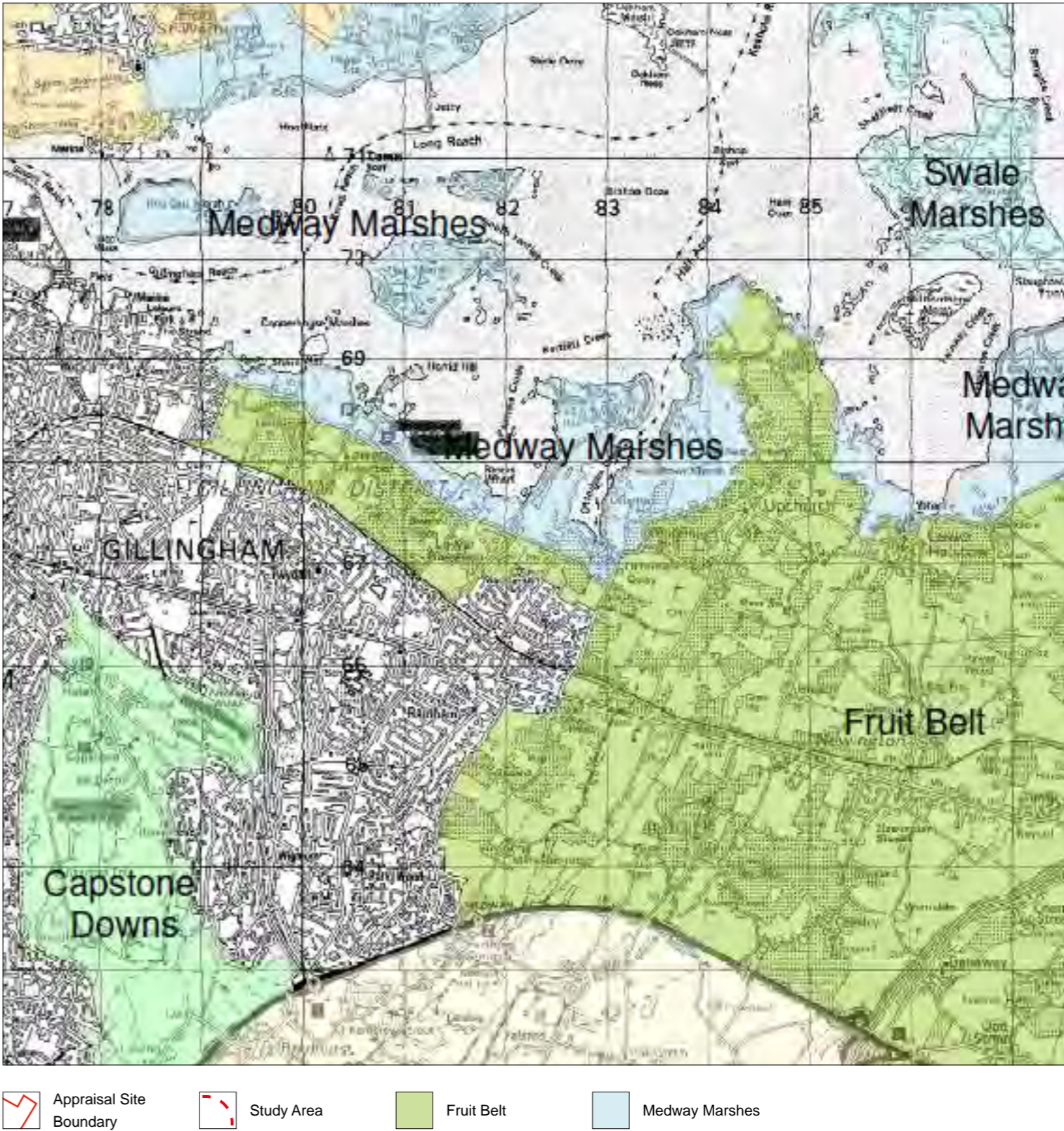
In general terms geology can be divided into two distinct types. To the north of the A2, London Clay and Head Brick Earth predominate with pockets of Thanet Beds and River Gravel creating a consistently flatter landform. To the south of the A2, linear pockets of chalk divide areas of clay with flint, Thanet Beds, Head Brick Earth and Head Deposits. This more complex geology is reflected in the more varied relief.

Land cover is dominated by a richly varied pattern of agricultural land uses. Orchards are the most distinctive feature of the landscape and are still widespread across this area. Mixed in amongst them are fields of pasture, arable and horticultural crops, all of which are typically defined by strong hedgerows or shelter belts, mainly of poplar. The complexity of this land use mix varies across the area, however, and some areas (notably to the northwest and south-west of Sittingbourne) are now more typically open arable farmland. In contrast to areas further south, woodlands are not a significant landcover element, but small blocks occur in a scattered distribution across the area. Small settlements and farm complexes add to the varied landcover. The extensive urban area of Sittingbourne, transport corridors and associated ribbon development and suburban land uses have a distinctly localised influence on the generally rural character of the area.

Woodlands, often with a coppice understorey, are the main natural ecological resource within this intensively managed landscape. Hawes Wood, Rook Wood, Yaughers Woods and Fox Burrow Woods are listed in the Ancient Woodland Inventory. Other elements potentially of ecological and wildlife value are the shelter belts, which are a more consistent framework of wildlife corridors than the often patchy hedgerow cover, and regenerating woodland and wetland habitats in the disused quarries to the south-east and north-east of Sittingbourne.

A notable feature in this landscape is the Roman Road Watling Street, now the A2. This transportation corridor has attracted development to it over the course of history. The fruit orchards have been a distinctive feature of this landscape since the 18th century.'

Fig. 10: Ordnance survey map indicating extent of surrounding Regional Landscape Character Areas.



- Key Characteristics**
- Rural/agricultural landscape.
 - Complex fruit, hops, pastoral and arable divided by small woodlands.
 - Small scattered villages and farms.
 - Rolling landscape with distinct valleys.
 - Large pockets of flat, open farmland, especially in coastal areas.
 - The M2 & A2-ribbon development and urban features.

4.4 The Condition of the LCA is assessed as Very poor and its Sensitivity as Low.

Description: Medway Marshes

‘The Medway Marshes are typically low lying and flat, with huge open skies and extensive views. To the north of the river, the marshes are dominated by the massive industrial complexes of Grain and Kingsnorth which sit in grand isolation amidst open marshland. This contrasts markedly with the more confined and ‘hectic’ industrial marshland landscapes of parts of the Thames Marshes and the more tranquil, pastoral landscape of the Swale Marshes. The southern Medway Marshes are much smaller and fragmented and have a much less coherent character.

Landform and geology have a profound influence on the character of the marshes which, having been formed from marine alluvial deposits, have a distinctively flat relief. A small outcrop of valley brickearth and gravel forms the higher ground of the Isle of Grain but the landform is obscured and dwarfed by the refinery complex and does not register prominently in the landscape.

The majority of marshland is reclaimed and protected from tidal inundation by coastal walls, although fragments of saltmarsh persist to the seaward side and as islands within the estuary itself. The traditional landcover is coastal grazing marsh, and large areas of typically flat, low-lying pasture with characteristic patterning of creeks and dykes still remain to the west of the Isle of Grain, with smaller fragments at Barksore and Horsham Marshes to the south.

The trend towards arable cultivation is less marked than in the Swale but, instead, the Medway Marshes have come under significant pressure from industrial and urban development. Large areas of the north Medway Marshes are now occupied by extensive industrial complexes, with their associated jetties, roads and rail links, while to the south of the river smaller-scale urban and industrial development has occurred in a piecemeal fashion along the

immediate coastline where marshes now barely exist.

The saltmarshes, mudflats and grazing marshes of the Medway form an integral part of the North Kent estuarine and marshland habitat complex which is of international importance for nature conservation. The grazing marshes which separate Allhallows and the Isle of Grain also form part of the North Kent Marshes Environmentally Sensitive Area.

The landscape of the Medway Marshes has long been associated with industrial use. The Romans established extensive salt and pottery workings around Upchurch and the shore was later used for the winning of estuarine clay. Like much of the north Kent coast the Medway marshes were of strategic military importance as illustrated by the blockhouses of Darnet Fort and Grain Tower.

In the 19th century George Chambers, John de Jardin Snr., Francis Moltino, W. D. Doust and William Wyllie painted this coastal landscape. In the 20th century the watercolourist and art historian Martin Hardie worked in this area. More recently Vic Ellis, Rowland Fisher and Hugh Lynch are associated with the Medway Estuary.

- Key Characteristics**
- Low-lying and flat fragments of marshland with extensive views, dominated by industrial complexes to the north of the river.
 - The southern marshes are less coherent.
 - Some coastal grazing marsh and salt marsh, some coastal smaller and walls, creeks and dykes.
 - Historical military features

4.5 The Condition of the LCA is assessed as Poor and its Sensitivity as Moderate

LOCAL LANDSCAPE CHARACTER AREA ASSESSMENT

The Medway Landscape Character Assessment (2011)

- 4.6 The Medway Landscape Character Assessment (2011), places the site within the North Kent Fruit Belt LCA, as shown in **Figure 11**. The Medway Marshes LCA is immediately to the north-east.
- 4.7 The character area profiles for these LCAs are also included in **Appendix 2** of this report.
- 4.8 The Site lies falls within LCA 21 Lower Rainham Farmland with the adjacent Riverside Marshes LCA to the north and Motney Hill LCA to the east.

Description: LCA 21 Lower Rainham Farmland

'Location – Lower Rainham Road (B2004) and Riverside Marshes/Country Park to north; railway line and Twydall to south; Gillingham to west; Lower Rainham and countryside to east

Geology – Upper Chalk and Thanet Beds (solid) with head deposits

Soils – Predominantly Grade 1

Accessibility – footpath network fragmented; no continuous, direct link between Grange Farm and

Berengrave Nature Reserve; rail line causes severance and weakens links into urban areas to south

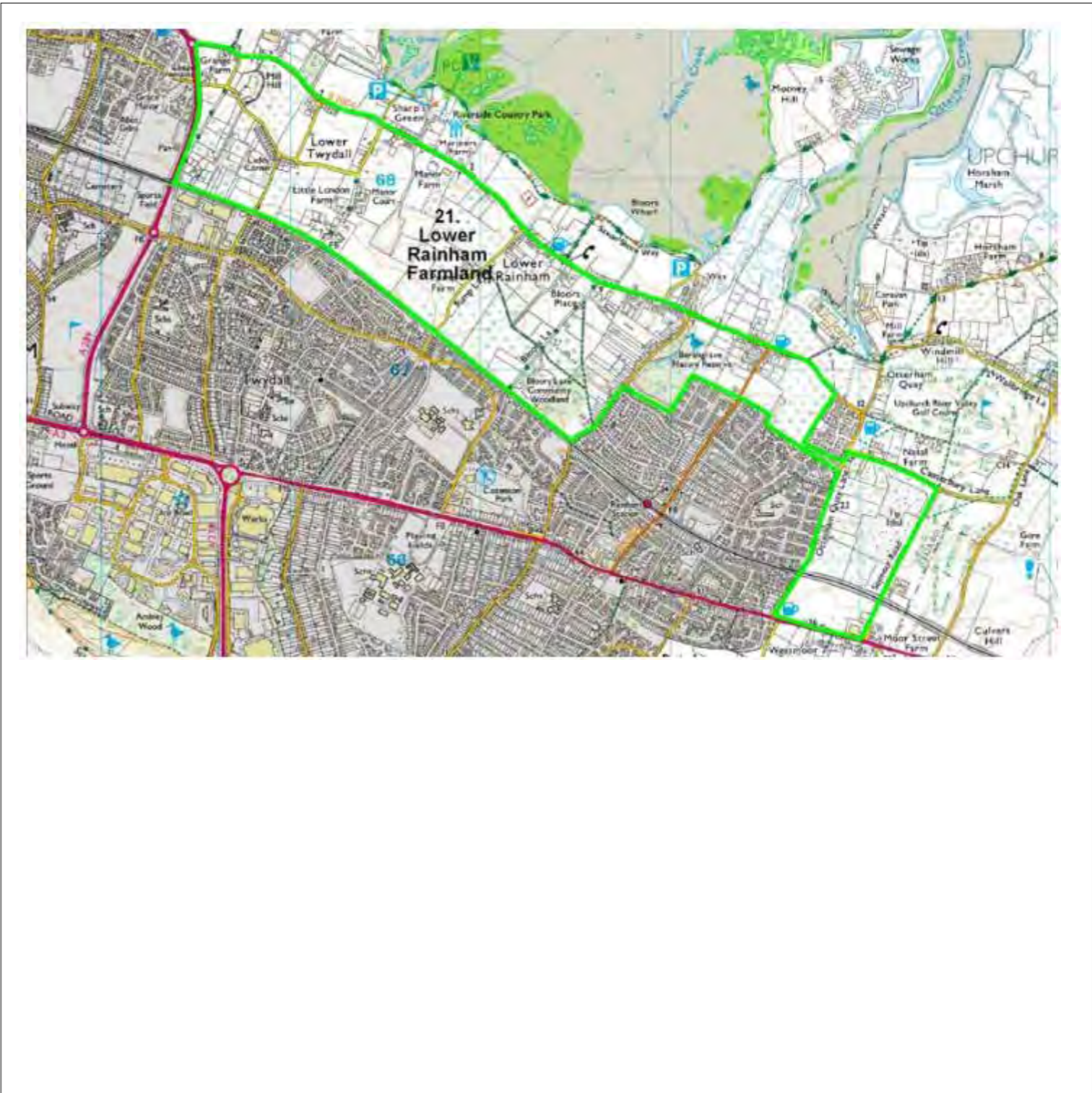
Designations – ALLI; 2 no. Conservation areas; 2 no. Rural lanes; 1 no. community woodland; Local Nature reserve

Flood – Berengrave area at risk from tidal flooding (2003)'

Key Characteristics

- Flat, small to medium scale mixed farmland – orchards, arable, rough grazing
 - Neglected pockets of land and busy road gives transitional urban fringe character to area; gradual trend towards suburbanisation (e.g. boundary features) in some localised areas
 - Some well managed areas of orchard, shelterbelt, farm buildings, cottages and distinctive rural hedge banks Tranquil in many parts despite enclosure by road to north and rail to south
 - Poor accessibility – east/west and north/south links to urban areas
 - Recent urban extension to north west of Otterham Quay Lane now divides this character area and diminishes coherence; area to east beyond Rainham has particularly detracting urban and industrial features – including industrial estate, tip with vents and railway line; golf course to north along Swale boundary
 - Includes small conservation areas/hamlets at Lower Rainham and Lower Twydall
- 4.9 The Condition of the LCA is assessed as Moderate and its Sensitivity as Moderate

Fig. 11: Ordnance survey map indicating extent of surrounding Local Landscape Character Areas.



5. SITE SPECIFIC LANDSCAPE CHARACTER AND VISUAL AMENITY STUDY

5.1 In 2018 Lloyd Bore were commissioned to produce an LVIA to support a previous application for an alternative residential development upon this site. As part of the that process a project specific landscape character and visual assessment was undertaken. Extracts from that original report have been included in this section of this report for reference.

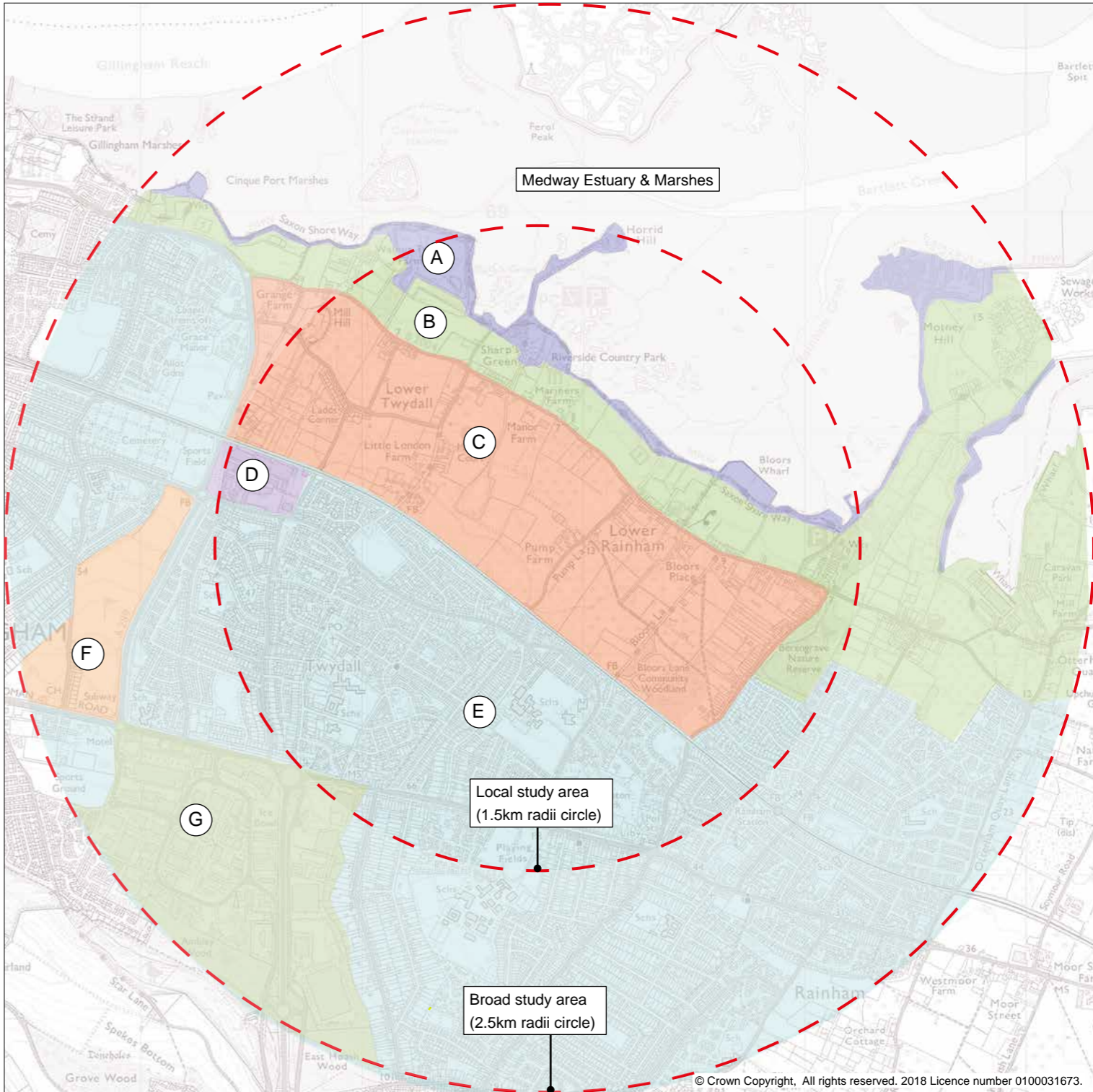
LANDSCAPE CHARACTER AREAS

- 5.2 The Project Specific LCA's identified by the Lloydbore LVIA 2018 are shown in **Figure 12** opposite and summarised below.
- 5.3 This previous work is shown in Figure 12 and supported by the following sections of text
- 5.4 It should be noted that the boundaries to each area are not abrupt, as there is often a transition between adjoining or neighbouring areas, particularly those with similar landscape characteristics or irretrievability between

STUDY AREA SPECIFIC LANDSCAPE
CHARACTER AREAS:

- (A) *Saxon Shore Way and Coastal Strip*
- (B) *Lower Rainham Road*
- (C) *Lower Twydall Fruit Belt*
- (D) *Beechings Way Industrial Centre*
- (E) *Twydall & Rainham Residential*
- (F) *Gillingham Golf Club*
- (G) *Gillingham Business Park*

Fig. 12: Study Area Specific Landscape Character Areas.



A - Saxon Shore Way & Coastal Strip

Landscape Designations:

Medway Estuary & Marshes SPA, SSSI, Ramsar Site, Country Park,
Area of Local Landscape Importance, Site of Nature Conservation
Interest and part of an RSPB Reserve.

General Description:

The Saxon Shore Way is a long-distance footpath running along the edge of the River Medway Estuary. The area includes the fringes of the Cinque Port Marshes and the inlet of Sharp's Green Bay. The Riverside Country Park extends east along the coast from Owens Way Industrial Centre to the western edge of Otterham Creek. The route passes the remains of Bloor's Wharf a former ship-breakers and scrap yard of which the remaining concrete seawall and steel fence interject an industrial character to the edge of the marshes. A causeway extending out into the estuary from Sharp's Green towards Bartlett Creek ends at Horrid Hill, the site of a 20th-century cement works the remains of which are in part still visible today.

Vegetation along the coastal edge is distinctive in character with a mix of scrub, grassland, small woodland groups and shelter belts and areas of salt marsh and reed beds.

East of Bloor's Wharf a narrow peninsular of land extends out into the estuary rising to a high point at Motney Hill. The site of a former cement factory, and now the site of a pumping station and sewerage works the coastline and lower portion of the peninsular forms part of the Medway Estuary and Marshes SSSI which overlaps with the Medway Estuary & Marshes SPAs, Medway Estuary and Marshes Ramsar Site and is part of an RSPB Reserve. The eastern shoreline leads down to the wharf at Otterham Creek.

The views inland from the shore are largely contained by the ribbon of mature scrub and trees that runs extends along the edge of the Saxon Shore Way down to Motney Hill Lane. The area is designated as an area of Local Landscape Importance.



Typical view along Saxon Shore Way



Typical view looking out from Saxon Shore Way
across the Medway Estuary

B - Lower rainham road

Landscape Designations:

Medway Swale SSSI, Medway Estuary & Marshes SPA,
Medway Estuary and Marshes Ramsar Site and an RSPB Reserve.

General Description:

The land between Lower Rainham Road and the coastline to the north lies mainly within the Riverside Country Park and is in predominantly agricultural use with a small to medium scale field pattern. Smaller fields near farm buildings are often left to form areas of scrub habitat whilst a number of the larger fields are used for growing arable crops. Mariners Farm south-east of the Riverside Country Park Car Park and Cafe has diversified into a boat yard. Tree cover within the area is limited to small woodland copses, shelter belts and tree and hedgerow along field boundaries and country lanes.

The character area includes the northern edge of the hamlet of Lower Rainham as well as a small number of residential properties on Motney Hill Road with a small light industrial unit; the hamlet of Lower Twydall which includes a small group of dwellings facing onto the road at Ladd's Corner and at the junction of Lower Rainham Road and Station Road. Outside of the Lower Rainham and Lower Twydall Conservation Areas, housing is predominantly post-war architecture.

The area includes the Berengrave Local Nature Reserve, a former Chalk Pit now wooded which includes a small lake, with a reed bed, which floods into an area of willow carr. The drier areas and sides of the pit contain woodland and mature scrub, with a small area of glades.

The Motney Hill peninsular up to the sewage works falls within the Medway Estuary and Marshes SSSI which overlaps with the Medway Estuary & Marshes SPA, Medway Estuary and Marshes Ramsar Site and is part of an RSPB Reserve. The lower portion of the peninsular and the eastern tip are designated as areas of Nature Conservation Interest. Much of the character area is designated as an area of Local Landscape Importance.



Typical view along Lower Rainham Road towards
the coast.



Typical view of Lower Rainham

C - Lower Twydall Fruit Belt

Landscape Designations:

Local Nature Reserve, Rural Lanes



General Description:

The Lower Twydall Fruit Belt covers a predominantly agricultural area south of Lower Rainham Road (B2004) down to the railway line on the northern edge of Twydall. The A289 forms the western boundary and to the east Berengrave Lane.

The area includes the hamlets of Lower Rainham and Lower Twydall. Lower Rainham features ribbon development along the road with predominantly post-war housing and Lower Twydall a collection of farms, a row of housing at Ladd's Corner and newer development associated with the listed buildings at Manor Court and at the southern tip of Lower Twydall Lane.

Large-scale commercial orchards make up the greater part of the agricultural landscape in particular, those associated with Manor Farm and Pump Farm with some larger fields in arable crop production.

Tree cover within the area apart from the orchards is limited to field boundaries, shelter belts, small woodland copses and sporadic trees within areas of scrub. The area also includes Bloors Lane Community Woodland comprising of areas of young mixed deciduous woodland with grassland rides and tall scrub. On the north-western edge of the community woodland are allotments.

There are two designated sections of Rural Lanes within the character area, one on Pump Lane running south from Pump Farm to the railway bridge and the other from the junction of Grange Lane and Lower Twydall Lane down to the junction of Eastcourt Lane and Lower Twydall Lane. These Rural Lanes are very narrow with mature hedge-lined boundaries. Views within the area both towards the coast and south towards the edge of Rainham and Twydall are generally contained by mature vegetation along PROWs and by mature field boundaries, scrub and shelter belts..



Typical view along a public footpath



Typical view north along Bloors Lane

D - Beechings Way industrial centre

Landscape Designations:

None



General Description:

This small business park lies to the east of Yokosuka Way (A289) and borders the edge of the Twydall and Rainham residential area. It comprises of a number of retail and light industrial units constrained by the railway line to the north. Maturing mixed deciduous woodland planting along the A289 screens views into the area from the west.



Typical view of the business park from Featherby Road



Typical view of the industrial centre from Beechings Way

E - Twydall & rainham residential

Landscape Designations:



General Description:

This character area covers the residential areas associated with the town of Rainham and Twydall. The area is predominantly housing along with six schools with associated playing fields and a number of small to medium scale areas of open space including Cozenton Park and Vinall Park.

The residential area is defined to the north by the railway line heading north-west/south-east and to the west by Ito Way (A289) heading north. Gillingham Business Park defines the south-western boundary with Hoath Way heading south; London Road (A2) heading towards Gillingham to the west dissects the character area.

Tree cover can be found along residential streets, bordering areas of open space and within woodland blocks planted alongside Ito Way.

Outside of the historic core of the town of Rainham, the suburban infill development is predominantly made up of post-war housing.

Views from within the area towards the coast are generally contained by the railway line, housing within the residential area, intervening tree cover and topography.



Typical view along Beechings Way



Typical view of post-war housing

F - Gillingham Golf club

Landscape Designations:

None



General Description:

The area includes the manicured golf club landscape forming its own character area, largely defined by its land use and with a short row of post-war houses along the east side of Woodlands Road which divides the golf in two.

The southern and eastern boundaries of the golf course are occupied by dense woodland which forms a buffer to the A289 with rear gardens of properties on Beatty Avenue and First Avenue forming the north and western boundaries respectively.

Vegetation groups are typical of a golf course landscape with greens, fairways and areas of rough, planned groups of mature trees and native hedgerows.

Views from within are largely framed by mature trees which surround much of the golf course.



Typical view looking north

G - Gillingham Business park

Landscape Designations:

Ancient Woodland



General Description:

This large business park occupies an area to the south of the A2 and along the line of the A278 and borders the edges of the Twydall & Rainham residential area. It comprises a number of both retail and light industrial units. The business park is bounded to the south by Ambley Wood and East Hoath Wood, both areas of Ancient Woodland, Ambley Wood is designated as a Local Nature Reserve. Woodland extends along the edge of the business park to the rear of residential properties off Edwin Road.

There is good mature tree cover within the business park with trees along the roads, along with a tree-lined central greenway and within infill woodland planting. Due to the extent of tree cover views into and out of the business park are generally contained.



Typical view along green way through the business park



Typical view of a business unit

6. ASSESSMENT OF POTENTIAL LANDSCAPE IMPACTS

POTENTIAL LANDSCAPE IMPACTS

- 6.1 Following completion of the desktop studies Tables 1 to 4 below, set out the preliminary predicted impacts upon individual landscape resources that may occur as a result of the proposed development of the site
- 6.2 This also includes a preliminary assessment as to the magnitude of the impact and susceptibility of the resource or receptor to the identified impact in order to determine is there is potential to result in an effect that would require further detailed assessment as part of any formal proposal submission and to have the potential to result in impacts upon existign landscape character and visual amenity

Table 1: Assessment of Potential Impacts upon Landscape Resources

Resource	Details of Impact	Susceptibility of Resource (High/Medium/low)	Magnitude of Changes (High/Medium/low)	Potential Impact Likely to occur
Vegetation Cover	Development of site would result in the significant loss of existing area of vegetation including fruit orchards	High	High	Yes
Topography	Development of site is likely to only require minor changes to existing site levels	Low	Low	No
Land Use	Development of site would result in a compete change in the prevailing land use characteristic of the site from commercial orchards to sub-urban / rural residential	High	High	Yes
Urban Grain	Development will result in a significant increase in the amount of built form across most of the site	High	High	Yes
Settlement Envelope	New development adjacent to and outside of the existing defined settlement envelope.	High	High	Yes

Table 2: Assessment of Potential Impacts upon National Designated / Protected Landscapes

Resource	Details of Impact	Susceptibility of Resource (High/Medium/low)	Magnitude of Changes (High/Medium/low)	Potential Impact Likely to occur
Ancient Woodland	Not present within Study Area or No identified impact	Nil	Nil	No
National Landscapes (AONB)	Not present within Study Area or No identified impact	Nil	Nil	No
National Parks	Not present within Study Area or No identified impact	Nil	Nil	No
World Heritage Site	Not present within Study Area or No identified impact	Nil	Nil	No
Listed Buildings	New development potential within the setting of Listed Building and or visible form Listed Buildings	Medium	Medium	Yes
Scheduled Monuments	Not present within Study Area or No identified impact	Nil	Nil	No
Historic Parks & Gardens	Not present within Study Area or No identified impact	Nil	Nil	No

Table 3: Assessment of Potential Impacts upon Local Designated / Protected Landscapes

Resource	Details of Impact	Susceptibility of Resource (High/Medium/low)	Magnitude of Changes (High/Medium/low)	Potential Impact Likely to occur
Special Landscape Area (SLA)	Development within or adjacent to an SLA	Medium	Medium	Yes
Area of High Landscape Value (AHLV)	Not present within Study Area or No identified impact	Nil	Nil	No
Area of Local Landscape Importance (ALLI)	Development within or adjacent to an ALLI	High	High	Yes
Conservation Area	Development proposed adjacent to a Conservation Area	Medium	Low	Yes
Green Belt	Not present within Study Area or No identified impact	Nil	Nil	No

Table 4: Assessment of Potential Impacts upon Public Access Routes

Resource	Details of Impact	Susceptibility of Resource (High/Medium/low)	Magnitude of Changes (High/Medium/low)	Potential Impact Likely to occur
Public Right of Ways (PRoWs)	Development will alter the immediate setting of a PRoW	High	High	Yes
National / Heritage Trail	No physical impact identified	Nil	Nil	No
Cycle Route	No physical impact identified	Nil	Nil	No
Existing Road Network	Development will alter the character and setting of a number of existing public highway	High	Medium	Yes

POTENTIAL EFFECT UPON LANDSCAPE CHARACTER

Summary

- 6.3 Based upon the above assessment it is concluded that development on this site of the kind proposed does have the likely potential to cause a clear change in the existing character of the site.
- 6.4 This impact is an unavoidable consequence of the clear change in the predominant land use and land cover characteristic of the site. The site will change of a predominantly rural commercial fruit orchard to a large sub urban / urban fringe rural residential mixed used development.
- 6.5 There will be a clear change to the existing settlement edge as a result of the introduction of significant new built form across the with the site moving into the wider urban fabric and out of the its current position within the surrounding rural landscape.
- 6.6 There is also the potential depending upon detailed design for this to impact upon a number of existing listed buildings, 2 small conservations areas and a section of Public Bridle way located on or around the perimeter of the site.
- 6.7 As a result of the change in the character of the site itself , it has been identified that the scheme also has the potential to cause impacts upon the character of both the designated SLA and ALLI at the Local Scale, by altering a comparatively large area located either within or immediately adjacent to these designated landscapes.
- 6.8 Historically the site has been identified within existing published assessments as making a significant and positive contribution to the character and setting of both of these designated areas.
- 6.9 However whilst the development would result in change in the character of the site it is concluded that the depending upon the detailed design that the development would be capable of delivering a high quality and aesthetically pleasing development of an appropriate character and vernacular for its setting and therefore would not result in a lowering of the condition or quality of the SLA or ALLI in the Long Term.

Conclusion

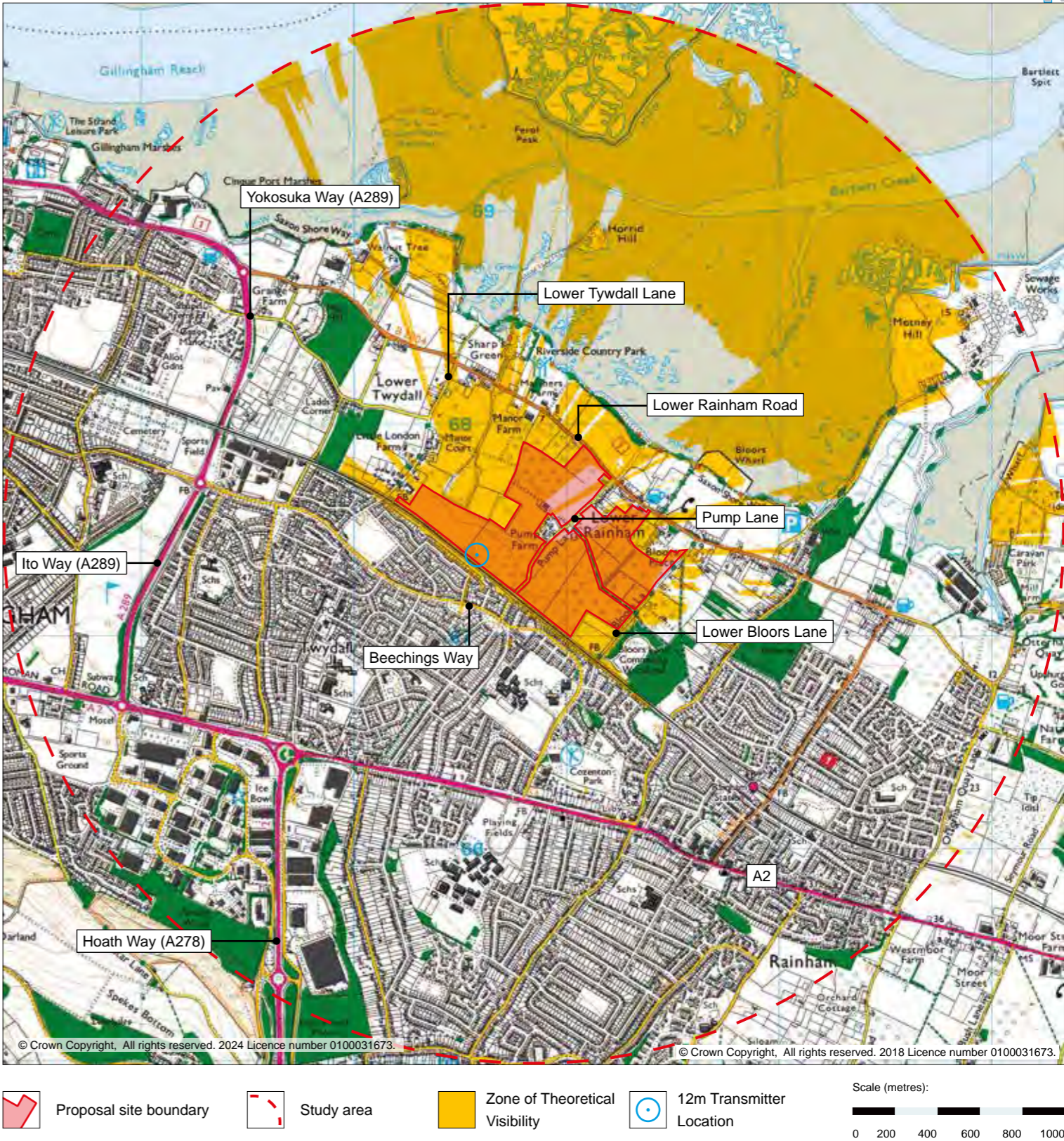
- 6.10 Overall it is therefore likely that the proposed development would result in an adverse impact upon landscape character in the short term at the site to local scale, altering and changing the prevailing character of the Lower Rainham Farmland LCA 21 as identified within the Medway Landscape Assessment 2003 with the site covering a significant proportion of this LCA as a whole.
- 6.11 It is likely however that impacts would be restricted to the local scale only and would not alter the existing landscape at the Regional and National Levels.
- 6.12 At the National level whilst the development would alter the character of the site it existing location on the edge of the existing expansive settlement of Rainham, and given the size of the site compared to the scale of the NCA as a whole it would not alter the existign characteristics of the landscape at a National scale.
- 6.13 Whilst the scheme would similarly alter the character of an area within the Fruit Belt LCA as identified within the Landscape Assessment of Kent 2004 and would be removing an area of commercial orchard that is characteristic of the key and valued characteristics of this LCA. The area of the site in comparatively small compared to the overall size of the LCA as a whole. It is also noted that this part of the Fruit LCA is a some what fragmented and disconnected narrow remnant of this former large LCA that is poorly connected to the rest of the LCA with extensive built up areas associated with Rainham north of the railway line effectively severing the connection between this area and the rest of the LCA which lies predominantly to the east of Rainham.
- 6.14 Whilst the site and its immediate surroundings share many of the physical characteristics of the Fruit Belt LCA due to this lack of meaningful connectivity it is perhaps actually more appropriate to consider this area as a separate and distinct LCA in its own right from the rest of the Fruit Belt LCA, The site and its surroundings have a more stronger relationship and being much more heavily influenced by the adjoining urban areas of Rainham than the rest of the Fruit Belt LCA.
- 6.15 Whilst development of the site would in effect remove the site from the Fruit Belt LCA and move it into the urban landscape of Rainham this is unlikely to result in a change in the character, condition or quality of the remaining parts of the Fruit Belt LCA.
- 6.16 On balance it is therefore concluded that this site and it surrounding landscape has a Moderate capacity to accommodate development of the type and scale proposed. Whilst there would be a permanent change to the character of the site and of the landscape generally at the local scale. This would not be out of keeping with the sites wider contextual setting and whilst it is likely that this change would be considered to be adverse in the short term in the long term it is concluded that the site and development could be accommodated into the landscape without causing significant long term adverse effects

7. ASSESSMENT OF POTENTIAL VISUAL IMPACTS

Zone of Theoretical Visibility

- 7.1 A Zone of Theoretical Visibility (ZTV) exercise has been carried out in relation to the proposal site, as summarised in **Figure 13-17**.
- 7.2 The ZTV is intended only to provide an initial broad-based assessment of the likely visibility shed of the proposal site, in order to establish potential publicly accessible locations from where views of the site might be gained. It should not be considered an fully accurate depiction of where views of the site or future development would be visible as it does not take account of the screening effect of all existign built form and vegetation cover present within the study area.
- 7.3 The exercise was undertaken at an early stage of the project and so several assumptions were made, which are summarised below. The diagrams were produced using *Global Mapper* computer software and are based upon standard 5m OS Terrain Data.
- 7.4 The ZTV is a representation only of the areas from where *potential* views may occur, and is not intended as an accurate representation of precise areas from where views will be gained. The ZTV diagram has considered only the screening effect of landform, major built up areas and major woodlands and does not take into account localised variations in landform, the presence of intervening vegetation cover, or other built structures such as walls or fences that could further affect visibility.
- 7.5 The diagrams are based on the following parameters:
- Transmitter heights of 3, 6, 9 and 12m above existing ground level located at a position at the highest part of the site, on the south-western boundary adjacent to the railway line. Several other locations were tested with similar Transmitter heights and in different parts of the site, however, they showed a very similar outcome, as indicated in Figure 17, where a Transmitter of 12m in height was placed in the central part of the site.
 - Receptor viewing height of 1.65m above ground level.
 - Significant woodland areas having been given a generic height of 15m.

Fig. 13: Zone of Theoretical Visibility (ZTV) for 12m transmitter at the highest point in the development site.



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S2 - INFORMATION

Fig. 14: ZTV Diagram for 6m transmitter at highest point of development site.



Fig. 16: ZTV Diagram for 9m transmitter at highest point of development site.



Fig. 15: ZTV Diagram for 12m transmitter at highest point of development site.

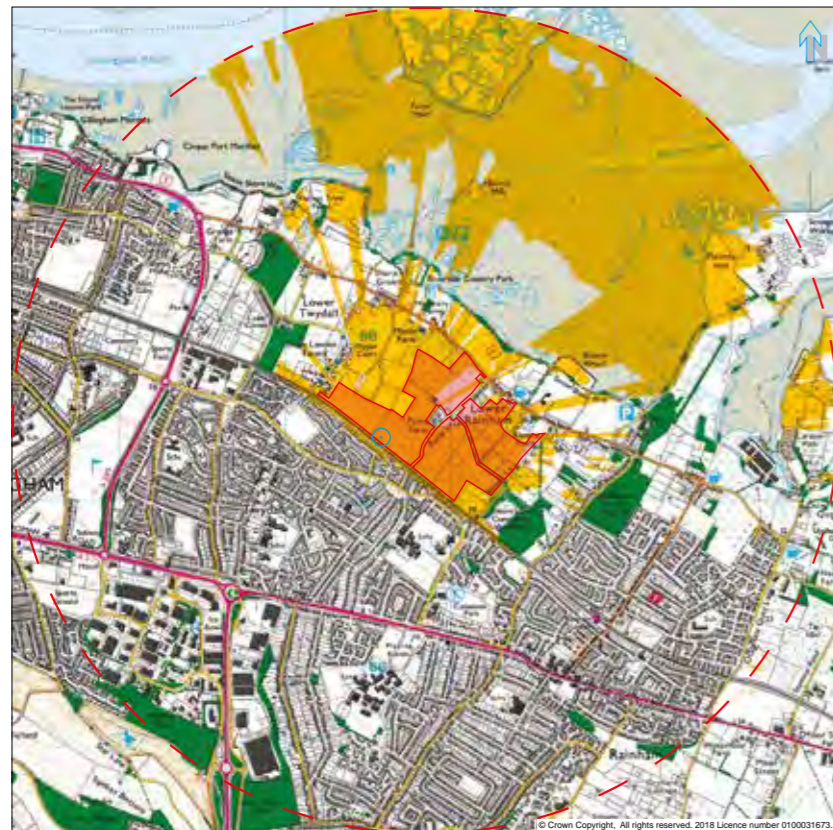
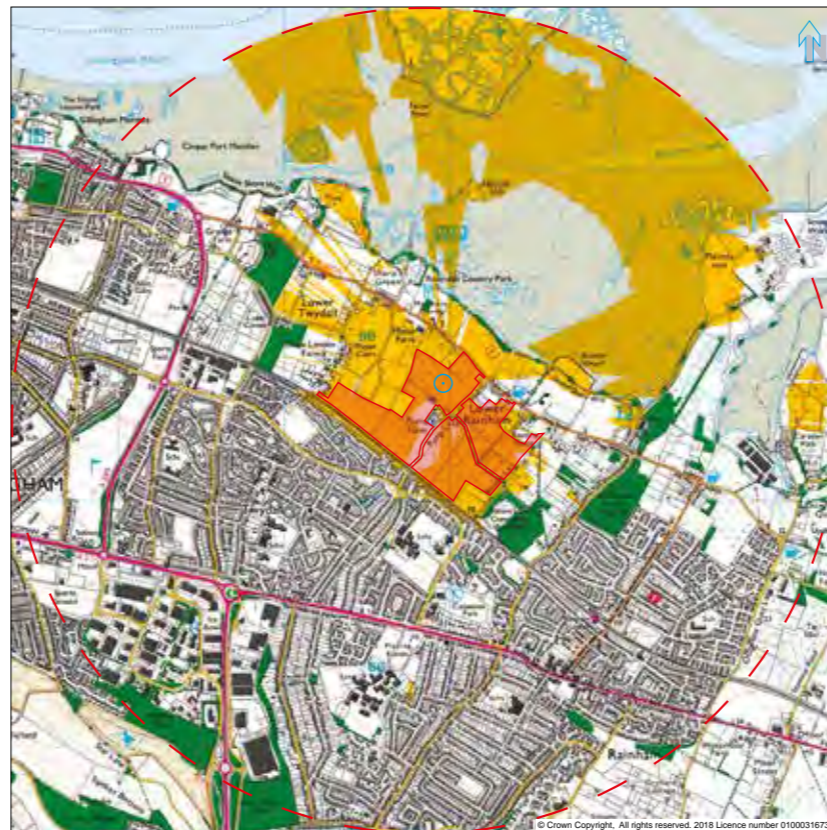


Fig. 17: ZTV Diagram for 12m transmitter at central part of site close to Lower Rainham Road.



Visual Receptors

Primary Receptors

- 7.6 Primary receptor locations have been identified as comprising:
- Residents of adjoining residential properties in particular:
 - Gifford Close, Thornham Road, Kingsnorth Road, Ripon Close, Truro Close, Beechings Way, Lower Rainham Road, Pump Lane, Wootton Green and River View.
 - Users of the surrounding PROW network in particular:
 - Bridle way GB6A and Saxon Shore Way
 - Drivers and passengers of vehicles travelling along Lower Rainham Road and Pump Lane.

Secondary Receptors

- 7.7 Secondary receptor locations have been identified as comprising:
- Views generally from Lower Twydall Road, Lower Bloors Lane.
 - Users of the surrounding PROW network, in particular:
 - Public footpath GB5 & GB6

Tertiary Receptors

- 7.8 Tertiary receptor locations have been identified as:
- Views from the northern coastline of the Medway Estuary.

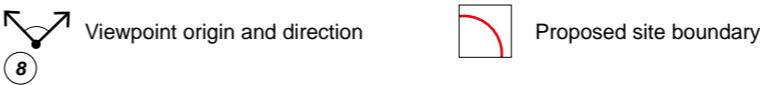
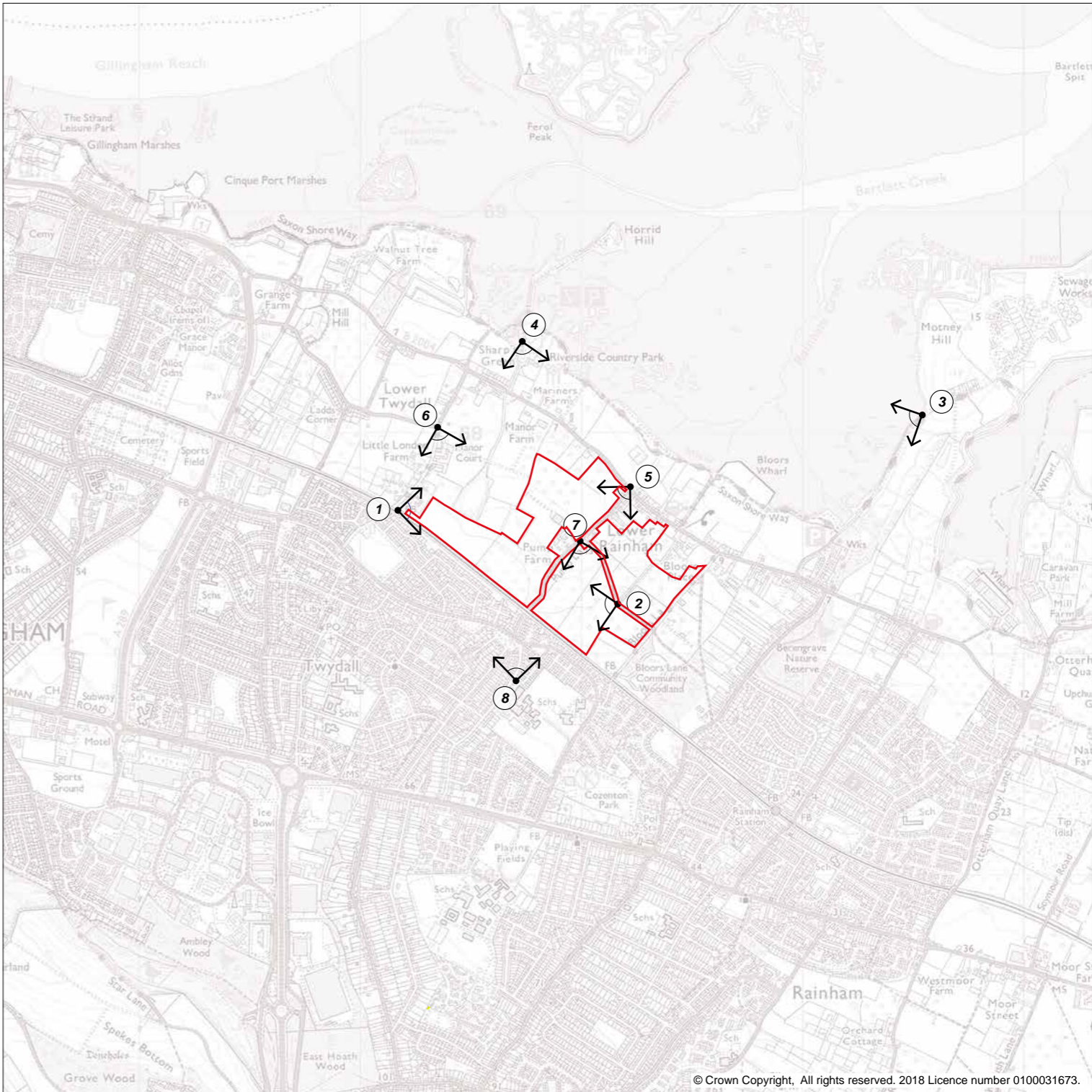
Representative Viewpoint Locations

- 7.9 Representative viewpoint locations for identified key visual receptors / locations are shown in **Figure 18**. These are considered to be representative of the nature of available views from all identified receptor sites and sufficient for assessment of the potential visual effects of the proposed development.

- 7.10 The selected representative viewpoint locations comprise:
- **View 1. Footbridge over the railway line at the end of Lower Twydall Lane**
 - **View 2. Bridle way from Bloors Lane to Pump Lane**
 - **View 3. Saxon Shore Way**
 - **View 4. Riverside Country park**
 - **View 5. Lower Rainham Road**
 - **View 6. Grange Road and Lower Twydall Road**
 - **View 7. Pump Lane (Centre)**
 - **View 8. Pump Lane (South)**

- 7.11 The baseline photography was taken by Lloyd Bore during a site visit on the 20th of August 2024.

Fig. 18: Assessment Viewpoint Locations



View 1: Footbridge over the railway line at the end of Lower Twydall Lane

Receptors:

- 7.17 This view is representative of those gained from pedestrians crossing the railway line on the footbridge and from residential properties located along Kingsnorth Road, Gifford Close, Wootton Green, River View, Truro Close, Ripon Close, Thornham Road and Beechings Way within 50m of the proposed southern boundary of the site.
- 7.18 This view would be experienced predominantly by:
- Pedestrians, including residents using the footbridge over the railway line.
 - Passengers on trains.
 - Residents of properties with north/east facing views from the first floor, ground floor and rear gardens.

Key Feature / Detractors:

- 7.19 Existing components of the view include:
- A small woodland block on the edge of the adjacent property on Lower Twydall Lane.
 - The railway line.
 - Dwelling at Russett Farm on Pump Lane.
 - Mature vegetation to the rear of properties on the south side of Lower Rainham Road.
- 7.20 There are no significant visual detractors within the view other than the railway.



Description:

- 7.12 This is a short range, predominantly open view into the western and central part of the site. The view, over a vegetated edge along the northern boundary of the railway line is of commercial orchards, with mature hedgerow field boundaries. A small woodland on the southern edge of the adjacent residential property on Lower Twydall Lane forms the western part of the view.
- 7.13 The viewing location is generally quiet apart from the occasional passing train. The condition of the viewing location is assessed to be good and a fairly typical view from the rear of residential properties.

Nature of Change

- 7.14 From this location it is considered likely that any development on the site would be visible. This would include;
- Any proposed landscaping along of the site would be clearly visible.
 - Without any new boundary planting any new buildings would be clearly visible. However the inclusion of any new boundary planting is likely to provide at least partial screening of any new development in the long term and would element views of new built form to the partial views of the roofs and upper storeys of buildings subject to the nature of any detailed design and layout.

Assessed Effect

- 7.15 The 'Magnitude of Change' upon this view is assessed to be High and Permanent.
- 7.16 Overall it is concluded that the changes in this existing view would have an Adverse impact in the short term but that dependant upon the nature of any proposed landscape proposals along the sites southern boundary with the railway line have the potential to reduce to Neutral in the Long term.

View 2: *Bridle way from Bloors Lane to Pump Lane*

Receptors:

- 7.26 This view is representative of those gained from walkers and users on the bridle way (travelling north-west).
- 7.27 This view would be experienced predominantly by:
- Walkers and users on the bridle way (GB6A).

Key Feature / Detractors:

- 7.28 Existing components of the view include:
- Residential properties of post-war housing style.
 - The railway line.
 - Existing vegetation along the southern boundary of the site.
 - Commercial orchards.
- 7.29 There are no significant visual detractors within the view other than the railway.

Description:

- 7.21 The foreground of the view is of commercial orchards with partial views of the rear of properties on Ripon Close, Truro Close and Beechings Way in view over the railway line and through the mature vegetation along the southern boundary of the site. In the distance, the rooftops and upper storeys of properties on Pump Lane can be seen on the skyline viewed through and over existing vegetation on the edge of the lane.
- 7.22 The viewing location is generally quiet apart from the occasional passing train. The condition of the viewing location is assessed to be very good and the view is more open than the majority of the bridle way which is for the most part bounded by mature vegetation which contains views.

Nature of Change

- 7.23 From this location the proposed development would most likely fundamentally alter the nature of the existing view the existing area of extensive commercial orchards would be removed and depending on the detailed design of any proposal be replaced with views of new residential properties with associated internal roads, driveways and associated domestic landscaping along with areas of new landscaped public open space.



Assessed Effect

- 7.24 The 'Magnitude of Change' upon this view is assessed to be High and Permanent.
- 7.25 Overall it is concluded that the changes in this existing view would have an Adverse impact in the short term but that dependant upon the nature of any proposed landscape proposals along the route of the bridle way would have the potential to reduce to Neutral in the Long term potentially even Beneficial if the scheme included enhancements to the condition and quality of the Bridle way.

View 3: Saxon Shore Way

Receptors:

- 7.36 This view is representative of those gained from walkers on the Saxon Shore Way and by motor vehicles travelling south-west along Motney Hill Lane.
- 7.37 This view would be experienced predominantly by:
- Pedestrians using the Saxon Shore Way long distance footpath.
 - Drivers and passengers of motor vehicles travelling south-west.

Key Feature / Detractors:

- 7.38 Existing components of the view include:
- Salt marsh and Rainham Creek shoreline.
 - Saxon Shore Way coastal path.
 - Bloors Wharf.
 - Houses within Lower Rainham.
 - Outbuildings associated with Pump Farm.
 - Mature scrub along the coastal edge.
 - Commercial orchards.
 - The railway line.
 - The rear of properties along Thornham Road, Gifford Close and Kingsnorth Road.
- 7.39 There are no significant visual detractors within the view

Description:

- 7.30 The foreground view is of the salt marsh along the edge of Rainham Creek. In the middle distance can be seen the derelict hulk of an old boat and behind, the remnants of Bloors Wharf the former ship breakers yard. Mature scrub forms a backdrop to the coastline and behind, the rooftops of dwellings in Lower Rainham can be glimpsed through gaps in the mature vegetative cover. On the eastern edge of the hamlet can be seen outbuildings associated with Pump Farm. The central and western part of the site on the gently rising ground is in partial view to the right of Lower Rainham. In the distance beyond the southern boundary of the site is the railway line and the rear of properties along Thornham Road, Gifford Close and Kingsnorth Road.
- 7.31 The viewing location is quiet and calm, with Motney Hill Lane a little-used route and the condition of the viewing location is assessed to be very good comprising a fairly typical section of public road and footpath of average quality and condition.



Nature of Change

- 7.32 From this location the proposed development would result in a noticeable change in the existing view. The existing orchards and outbuildings associated with Pump Farm would be removed and the railway line would no longer be visible. These would be replaced by views of the roofs and upper storeys of new buildings along with any new internal or boundary landscaping in the long term.
- 7.33 The key foreground of the view however would remain unaltered and the overall character and composition of the view would not be changed and is it assessed that there would be no change tot he existing amenity value associated with this view.

Assessed Effect

- 7.34 The 'Magnitude of Change' upon this view is assessed to be Low and Permanent.
- 7.35 Overall it is concluded that the changes in this existing view would have an Minor Adverse impact in the short term but this would quickly reduce to Neutral in the Medium to Long term And certainly once any new boundary and internal planting with the developed matured and begin to provide screening of any new built form.

View 4: Riverside Country Park

Receptors:

- 7.46 This view is representative of those gained from pedestrians at the Riverside Country Park and walking along the Saxon Shore Way.
- 7.47 This view would be experienced predominantly by:
- Pedestrians using the Riverside Country Park.

Key Feature / Detractors:

- 7.48 Existing components of the view include:
- The Riverside Country Park Visitor Centre and Car Park.
 - Mature scrub and tree cover.
- 7.49 There are no significant visual detractors within the view.



Description:

- 7.40 This is a medium distance view towards the site from the Riverside Country Park and the Saxon Shore Way. The view to the site is screened by the intervening mature scrub and tree cover along the edge of the coast and to the rear of the Riverside Country Park Visitor Centre.
- 7.41 The viewing location is quiet and the condition of the viewing location is assessed to be very good and an elevated view from the Saxon Shore Way.

Nature of Change

- 7.42 From this location, the proposed development would introduce no new visual components into the view.
- 7.43 The development would result in the loss of no existing components from the existing view.

Assessed Effect

- 7.44 The 'Magnitude of Change' upon this view is assessed to be Nil and Permanent
- 7.45 Overall it is concluded that there would be no impact upon this view.

View 5: Lower Rainham Road

Receptors:

- 7.55 This view is representative of those gained from pedestrians walking along the footpath, motor vehicles travelling along Lower Rainham Road and residential properties situated at the junction of the road with Pump Lane including the Grade II listed Chapel House.
- 7.56 This view would be experienced predominantly by:
- Pedestrians walking along the highway footpath.
 - Drivers and passengers of motor vehicles travelling along Lower Rainham Road.
 - Residents of properties along Pump Lane with south or west facing views from the first floor, ground floor and rear gardens

Key Feature / Detractors:

- 7.57 Existing components of the view include:
- Commercial orchards.
 - Lower Rainham Road.
- 7.58 The frequent traffic on Lower Rainham Road is a significant visual detractor within the view.

Description:

- 7.50 This is a close-range view into the northern part of the site through the existing vegetation along the site boundary. The view through the existing hedgerow is of a commercial orchard with mature tree cover in the distance.
- 7.51 The viewing location is generally busy with the frequent passing of cars. The condition of the viewing location is assessed to be ordinary and a fairly typical view from the road and footpath.

Nature of Change

- 7.52 From this location the proposed development would result in a noticeable change in the existing view. The existing orchards would be removed and the railway line would no longer be visible. These would be replaced by views of the roofs and upper storeys of new buildings along with any new internal or boundary landscaping in the long term.



Assessed Effect

- 7.53 The 'Magnitude of Change' upon this view is assessed to be Medium and Permanent
- 7.54 Overall it is concluded that the changes in this existing view would have an Minor Adverse impact in the short term but this would quickly reduce to Neutral in the Medium to Long term And certainly once any new boundary and internal planting with the developed matured and begin to provide screening of any new built form.

View 6: Grange Road & Lower Twydall Road

Receptors:

- 7.66 This view is representative of those gained from motor vehicles travelling along Grange Road and Lower Twydall Road and properties at Manor Court.
- 7.67 This view would be experienced predominantly by:
- Drivers and passengers of motor vehicles travelling east on Grange Road and south along Lower Twydall Road.
 - Residents of properties at Manor Court with south-east facing views from the first floor, ground floor, and rear gardens.

Key Feature / Detractors:

- 7.68 Existing components of the view include:
- Agricultural fields.
 - Mature trees, hedgerows and scrub.
 - Rooftop and upper storey of dwelling at Russett Farm on Pump Lane.
- 7.69 There are no significant visual detractors within the view.

Description:

- 7.59 There is a partial view into the eastern and central part of the site. The foreground view is across an agricultural field bounded by mature trees and hedgerow cover. The rooftop and upper storey of a dwelling at Russett Farm on Pump Lane is in view over the intervening mature vegetation.
- 7.60 The viewing location is generally quiet and the condition of the viewing location is assessed to be good and a fairly typical view.

Nature of Change

- 7.61 From this location the proposed development would result in a noticeable change in the background of the existing view. New views of the roofs and upper storeys of new buildings along with any new internal or boundary landscaping would be introduced in the background of the view. These would however only form a very minor component of the view and the foreground and mid-distance of the view would remain unaltered.
- 7.62 As a result the overall character and composition of the view would not be changed and it is assessed that there would be no change to the existing amenity value associated with this view.



7.63 Assessed Effect

- 7.64 The 'Magnitude of Change' upon this view is assessed to be Negligible and Permanent
- 7.65 Overall it is concluded that the changes in this existing view would have a Neutral impact in the short term and long term.

View 7: Pump Lane Centre

Receptors:

- 7.75 This view is representative of those gained from motor vehicles travelling north/ south and from residential properties located on Pump Lane.
- 7.76 This view would be experienced predominantly by:
- Drivers and passengers in motor vehicles travelling along Pump Lane.
 - Residents of properties along Pump Lane with eastern/western facing views from the first floor, ground floor, and rear gardens.

Key Feature / Detractors:

- 7.77 Existing components of the view include:
- Mature tree and hedgerow cover along field boundaries.
 - Commercial orchards.
- 7.78 There are no significant visual detractors within the view other than the rural lane.

Description:

- 7.70 This is a short range, open view into the central part of the site. The view, through a gap in the mature roadside vegetation, is of a commercial orchard with a backdrop of tree cover along the field boundary.
- 7.71 The viewing location is generally busy with frequent traffic movement along the road. The condition of the viewing location is assessed to be ordinary and a fairly typical view from Pump Lane.

Nature of Change

- 7.72 From this location the proposed development would result in a noticeable change in the existing view. The existing orchards would be removed. These would be replaced by views of the roofs and upper storeys of new buildings along with any new internal or boundary landscaping in the long term.



Assessed Effect

- 7.73 The 'Magnitude of Change' upon this view is assessed to be Medium and Permanent
- 7.74 Overall it is concluded that the changes in this existing view would have an Adverse impact in the short term but this would quickly reduce to Neutral in the Medium to Long term And certainly once any new boundary and internal planting with the developed matured and begin to provide screening of any new built form..

View 8: Pump Lane South

Receptors:

- 7.85 This view is representative of those gained from motor vehicles and pedestrians travelling north along Pump Lane by Rainham Mark Grammar School and residential properties on Pump Lane.
- 7.86 This view would be experienced predominantly by:
- Drivers and passengers in motor vehicles travelling north along Pump Lane.
 - Residents of properties along Pump Lane with northern facing views.

Key Feature / Detractors:

- 7.87 Existing components of the view include:
- Mature tree cover within residential gardens.
 - Masts of boats stored at Mariners Farm Boat yard backed by a mature shelterbelt.
 - Motor vehicles on Pump Lane.
 - Residential properties of a post-war housing style.
 - Commercial orchards.
- 7.88 There are no significant visual detractors within the view other than Pump Lane.

Description:

- 7.79 This is a medium distance, partial view into the centre of the site over existing housing on Pump Lane on the edge of the Twydall and Rainham urban area and through intervening mature tree cover. Beyond the site, the masts of boats stored at Mariners Farm Boat yard can be seen backed by a shelterbelt and mature tree cover and scrub. In the distance on the skyline can be seen the estuary of the River Medway and Kingsnorth Substation complex on its northern shore.
- 7.80 The viewing location is busy with the frequent movement of cars along Pump Lane. The condition of the viewing location is assessed to be ordinary and a fairly typical view from Pump Lane.

Nature of Change

- 7.81 From this location the proposed development would result in a visible but potentially not obvious change in the background of the existing view. The existing orchards would be removed and replaced by views of the roofs and upper storeys of new buildings along with any new internal or boundary landscaping in the long term. The long distance view of the Estuary would remain.



- 7.82 The key foreground of the view however would remain unaltered and the overall character and composition of the view would not be changed and is it assessed that there would be no change to the existing amenity value associated with this view.

Assessed Effect

- 7.83 The 'Magnitude of Change' upon this view is assessed to be Negligible and Permanent
- 7.84 Overall it is concluded that the changes in this existing view would have an Neutral impact in the short term and long term.

- 7.89 Following completion of the field observations Table 5 below, set out the preliminary predicted impacts upon individual visual receptors that may occur as a result of the proposed development of the site.
- 7.90 This also includes a preliminary assessment as to the magnitude of the impact and susceptibility of the receptor to the identified impact in order to determine is there is potential to result in an effect that would require further detailed assessment as part of any formal proposal submission and to have the potential to result in impacts upon existign landscape character and visual amenity
- 7.91 Receptor Susceptibility is expressed in terms of Primary, Secondary and Tertiary, based upon:
- Their proximity to the site,
 - Their susceptibility to changes in the view, and
 - The amenity value of the existing view.
- 7.92 Primary Receptors are those assessed to be the most susceptible due to their proximity and / or associated amenity value and require further assessment. Secondary Receptors are those assessed to be of average susceptibility and may require further assessment depending on their proximity or amenity value. Tertiary receptors are those considered to be least susceptible due either to their remoteness from the site and / or the low amenity value associated with the locations or activities being undertaken, and therefore not requiring further assessment.

Table 5: Assessment of Potential Impacts upon Visual Receptors

Receptor Location	Susceptibility of Receptor			Magnitude of Changes (High/Medium/Low)	Potential Impact Likely to occur
	Primary	Secondary	Tertiary		
Footbridge over the railway line at the end of Lower Twydall Lane	X			High	Yes
Bridle way from Bloors Lane to Pump Lane	X			High	Yes
Saxon Shore Way	X			Low	No
Riverside Country Park	X			Nil	No
Lower Rainham Road	X			Medium	Yes
Grange Road & Lower Twydall Road		X		Negligible	No
Pump Lane - Centre		X		Medium	Yes
Pump Lane - South		X		Negligible	No

Summary

- 7.93 Based upon the above assessment it is concluded that development on this site of the kind proposed has only a very limited potential to cause adverse visual impacts and a lowering of the existing visual amenity for most receptors.
- 7.94 Due to the nature of existing vegetation cover along the site boundaries and within the surrounding landscape and the railway line to the north, the site has a very small visual envelope with views of the site being large limited to locations immediately adjacent to the site boundary and from the elevated foot bridge across the railway line and the Bridle Way which cross the site directly.

Conclusion

- 7.95 Overall it is therefore likely that the proposed development would result in a Neutral impact upon Visual Amenity in the Long term at the site scale, and no visual impact at the local scale or beyond.
- 7.96 On balance it is therefore concluded that this site and it surrounding landscape has a High capacity to accommodate development of the type and scale proposed. Whilst there would be a permanent and major change to the appearance of the site itself this would be experienced from only a very small number of locations.
- 7.97 The proposed development itself is capable of appearing as a high quality and visually attractive development that would not be considered to be uncharacteristic or out of keeping the wider landscape context and is not likely to be considered to be most people to be a visual detractor, and therefore would not result in a long term lowering of the quality and conditions of views nor the overall perceived visual amenity experienced by future receptors.
- 7.98 It is therefore concluded that the site and development could be accommodated into the landscape without causing significant long term adverse effects

8. DESIGN RECOMMENDATIONS

LANDSCAPE MITIGATION

8.1 Whilst no detailed proposals for the site currently exist based upon the above assessment it is recommended that any detailed scheme should consider implementing the following landscape design principles and mitigation measure to help to avoid and / or reduce the potential impacts identified by this report,

Vegetation Cover

8.2 It is generally considered that given the nature and scape of the proposed development that it will not be possible to avoid or significantly reduce the potential impacts upon the existing vegetation cover characteristics of the site. However it is recommended that the incorporation of the following measures would help to retain some element of the existing land use characteristics of the site.

- Where possible proposed areas of new Public Open Space within the development should look to retain and incorporate areas of existing vegetation in particular areas of Orchard Planting, Grassland and mix species native hedgerow.
- Where new landscaping is proposed this should also look to recreate areas of vegetation cover and semi natural habitat that is reflect of this site current rural agricultural character again by creating areas of Orchard style tree planting, mosaics of grassland and new sections of native species field hedge.

Topography

8.3 It is not considered likely that the development of the site would required extensive and significant alterations to the topography across the site to enable the development. However it is suggested that the scheme should avoid creating any artificially elevated or sunken topographic features and should look to retain the overall, flat low lying and gently northward falling character of the site.

Land Use

8.4 It is generally considered that given the nature and scape of the proposed development that it will not be possible to avoid or significantly reduce the potential impacts upon land use. However it is recommended that the incorporation of the following measures would help to retain some element of the existing land use characteristics of the site.

- Where possible proposed areas of new Public Open Space within the development should look to retain, incorporate or recreate Orchard style tree planting.

Urban Grain and Settlement Envelope

8.5 Given that the site is currently large devoid of development and is large rural farmland in nature it is considered unavoidable that the development of the site would result in a change urban grain character of the site. However it is recommend that any detailed proposals should adopt a development grain that is reflective of the sites current rural setting and character. It should therefore look to adopt lower densities that are more in keeping with rural settlements and traditional farmstead complex. It is suggested that it should draw reference from the existing grain of existing rural development such as Lower Twydal rather than from the existing urban development south of the railway line.

8.6 In addition it is recommend that details proposals should look to deliver a varied density across the site with higher development density being located along he south edge adjacent to the railway line and fall as you move north and east across the site in order to create a gradual transition between the new development and the remaining open areas of countryside to the north and east.

Listed Building & Conservation Areas

8.7 Detailed layouts for the site should look to retain and provide sufficient undeveloped 'buffers' in the form of pubic open space or proposed ecology habitat area adjacent to the adjoining Conservation Area Boundaries and Listed Buildings to ensure that they remain individually identifiable and distinct from any new development.

Public Rights of Way

- The scheme should retain all existing PRoW that cross the Application Site and as far as possible keep them to their existing routes.
- The scheme should set back new development at a sufficient distance from the PRoW to provide a physical and visual buffer and to maintain their green and naturalistic character.

- The scheme should seek to locate new green infrastructure routes and public open space along the routes of the PRoW to maintain a high level of amenity setting to the PRoW and maximise opportunities for connectivity and permeability, linking to PRoW and landscape spaces outside the Application Site boundary and into the wider landscape.
- The scheme should also include proposals to upgrade the surface treatment and maintenance of existing PRoW to improve their condition and accessibility.

Rural Lanes and Roads

8.8 Any detailed proposals should look to retain the existing 'rural lane' character of the Pump Lane. Similarly it is recommended that any road within the proposed development should also adopt a 'rural lane' character in order to retain the overall rural character of the site, In particular it is recommended that whilst adhering to any necessary highway standard requirements the roads should look to avoid the inclusion of pavements and footpaths where possible. Where required these should be on only one side rather than both and the roads should be enclosed by tall native species hedgerows. Street lighting should also be kept to a minimum

8.9 It is also suggested that new development within the site should be set well back from road so that they do not appear visible from the road except for perhaps the odd occasional individual or small cluster of dwellings and should avoid creating a continuous ribbon of development along either side of the road,

VISUAL MITIGATION

- 8.10 The report has identified that the site has a naturally high level of screening and as a result a small visual envelope. As a result the site has very limited potential to result in visual impact beyond locations immediately adjoining the site boundary.
- 8.11 However it is recommend in order to ensure that the visual impacts of any future development is contained to within the site that any detailed proposals should look to include sufficient area of retained and new Public open space / habitat areas along the following site boundaries

Southern Boundary

- 8.12 Any scheme should look to create a sufficiently wide woodland buffer along the boundary with the rail way line. Whilst the rail way line already provides an effective screen for views from the south an enhanced woodland buffer in this location would ensure that any long range views of the site from elevated locations to the south would be addressed and that the new development would not detract from views of Estuary to the north. Such a buffer would also create an opportunity to provide an improved green infrastructure link between Bloor Lane Community Woodland to the east and the area of woodland located between Lower Twydall Land and Eastcourt Lane to the west.

Eastern Boundary

- 8.13 Any scheme should look to retain and create a 'undeveloped buffer' along the boundary of Lower Bloor Lane in order to retain the rural lane character of the road. New development should be set well back from boundary so that they do not appear visible from the road except for perhaps the odd occasional individual or pair of dwellings.

Northern Boundary

- 8.14 Any scheme should look to retain and create areas of public open space and habitat areas along the northern edge of the site in the form of woodland belts to provide long term screening of any potential views from the Saxon Shore Way and Riverside Country Park and to provide a physical separation between the new development and the existing settlement of Lower Rainham.
- 8.15 Development and Built form should be kept to the minimum in the north west corner adjacent to Lower Rainham Road, to minimise visible development as viewed from Riverside Country Park and Saxon Shore Way.