



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

**Representation submitted  
by Esquire Developments  
Ltd**

**September 2024**





# ESQUIRE

DEVELOPMENTS

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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 (Appendix A);
  - 2) Land at Stoke Road, Hoo – allocated within Policy Allocation HHH33 (Appendix B);
  - 3) Land west of Edinburgh Road, Isle of Grain – allocated within Policy Allocation AS25 (Appendix C);
  - 4) Flanders Farm, Hoo – not presently identified for allocation; and
  - 5) Pump and Bloor Farm, Rainham – not presently identified for allocation.
- 1.3 These representations focus on Sites 1 – 3 with Site 4 and Site 5 being subject to separate representations by Esquire Developments. Sites 1 – 3 are allocated sites within the emerging Medway Regulation 18 Local Plan (MCLP) and therefore these representations provide a comprehensive assessment of these sites and address the common themes which relate to the preferred spatial strategy and address the relevant site-specific technical matters.
- 1.4 In the case of Site 1, Land adjacent to Fenn Street and Ratcliffe Highway, the Site was submitted by Esquire Developments in the previous Call for Sites (Ref: AS6). After a period of pre-application and public engagement, a Full planning application was subsequently submitted for 44 new homes with the provision of associated parking, open spaces, SUDs, and earthworks. Provision of overflow parking for Fenn Bell Conservation Project and enhancement to existing access from Fenn Street in February 2024 (Ref: MC/24/0291). The Site was subsequently allocated within the emerging MCLP.
- 1.5 In the case of Site 2, Land at Stoke Road, Hoo, the Site was submitted by Esquire Developments in the previous Call for Sites (Ref: HHH33). After an extensive period of pre-application and public engagement, a Full planning application was subsequently submitted for

demolition of the Sturdee Club and associated structures, and erection of 134no. residential dwellings including affordable and over 55's homes), children's nursery, café/community hub, commercial/retail floorspace, new public open spaces, SUDs, landscaping and biodiversity areas and play areas. Access to be from 4no new locations from Stoke Road. Provision of roads, parking spaces and earthworks in December 2023(Ref: MC/23/2857). The Site was subsequently allocated within the emerging MCLP.

- 1.6 Finally, in the case of Site 3, Land West of Edinburgh Road, Isle of Grain, the Site was submitted in the previous Call for Sites on behalf of the Landowner and since that time, Esquire have been identified as the preferred development partner (Ref: AS25). An extensive period of pre-application and public engagement was conducted prior to the submission of an application. A Full planning application was submitted for the erection of 34 affordable dwellings including access, parking, landscaping, open space and associated infrastructure and earthworks (ref MC/24/1289) and remains undetermined at the time of these representations.
- 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 three Sites and why they can be relied upon as suitable and appropriate locations for residential development that can be delivered in a sustainable location and within the Plan period. Furthermore, these representations should be read in conjunction with the previous representations made to the initial Reg 18 Medway Local Plan in October 2023.
- 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**

- I.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.
- I.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.
- I.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 F.

- 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 constraint 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 more recently 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 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 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 Sites.

Section 4.0: Development Management Policies.

Section 5.0: Summary of Representations.

- 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;
- We support the identification of the above sites for allocation within the Local Plan;
- We support the inclusion of a small/medium sized sites policy to address the requirement set within the NPPF for 10% of housing developments to be on small sites.
- We consider a number of development management policies are unsuitable resulting in a complicated and ineffective policies.

## 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 annum, 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 **support** this approach.
- 2.3 However, taking the consultation as a whole, the Reg 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. This is explored in greater detail below.
- 2.4 Our previous representations made comments in respect of the Setting the Direction for Medway 2040 Document for 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.
  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 Reg 18 provides a 'Blended Strategy' that is to be taken forward, and therefore 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 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. 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.
- 2.8 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.
- 2.9 In order to reduce this risk, these representations provide for site specific information which demonstrates that they are suitable, available and achievable and accord with the Councils blended strategy. Accordingly the representation demonstrates that these sites can be relied upon by the Council and that on the basis that each is subject to a pending planning application that all technical matters have been fully understood and addressed and as such can be deemed appropriate as an allocation for the Local Plan.

2.10

Summary

- 2.11 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.
- 2.12 The Plan period needs to be reviewed and extended to ensure that from adoption the Plan period exceeds 15 years.
- 2.13 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.
- 2.14 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.



### 3.0 THE SUITABILITY OF THE SITES

3.1 Esquire Developments has a number of future land interests across Medway including:

- 1) Land adjacent to Fenn Street and Ratcliffe Highway – allocated within Policy Allocation AS6 (Appendix A);
- 2) Land at Stoke Road, Hoo – allocated within Policy Allocation HHH33 (Appendix B);
- 3) Land west of Edinburgh Road, Isle of Grain – allocated within Policy Allocation AS25 (Appendix C);

3.2 Each Site is considered in turn below.

i) **Land adjacent to Fenn Street and Ratcliffe Highway (Policy Allocation AS6)**

3.3 The Site is located adjacent to the Ratcliffe Highway in Fenn Street and occupies an area of approximately 2.2ha. The Site Location plan is included within Appendix A.

3.4 The Site comprises a large fallow field, with an area of crushed gravel on the northern part of the Site, used as an overflow carpark for the nearby Fenn Bell Conservation Project. It is bounded by residential development east and west, and an industrial area, including the Zoo to the north. The Ratcliffe Highway runs along the southern boundary.

3.5 The Site was submitted to the Call for Sites for approximately 40 dwellings on Land at Fenn Bell Zoo overflow Car Park (ref: AS6).

3.6 A Full planning application was submitted in February 2024 for 44 dwellings, roads, car parking, new public open space and landscaping including play areas. Provision is also sought to extend and retain the car park for the zoo and a new sustainable urban drainage system, a pumping station and earthworks (Ref: MC/24/0291). The proposed scheme provides 44 smaller dwellings (2-3 bed houses) to meet the demands for first time buyers and deliver homes that are more affordable for local people.

3.7 Crucially, the development of the Site will also result in enabling community related benefits, notably on the Fenn Bell Pub/café and the Fenn Bell Zoo itself (as part of a Full application ref: MC/24/0526). This application will include the delivery of sustainable sources of energy supply, new enclosures, a new vet room, and upgrades to the zoo infrastructure. These investments, generated by the proposed housing, will ensure the zoo can invest in these community related

projects associated and secure its long-term future – particularly helping deliver educational facilities to local schools and communities. The development will also provide for off site highways improvements by way of speed notifications, improved bus stops and localised flooding improvements.

- 3.8 The proposal will therefore deliver a substantial community benefit that is unique to Fenn Bell and come forward with a development that seeks to deliver homes for local people, including provision of Affordable Housing. The scheme will also deliver biodiversity net gain and substantial landscape buffers.
- 3.9 An extensive programme of community engagement was undertaken by both the Landowner and Esquire Developments incl. pre-application engagement with Medway planning department, on-site meeting with the Parish Council, Landowner and immediate neighbours, and public exhibition meeting with open invite to the local community.
- 3.10 The Planning Statement has also demonstrated that the scheme will accord with the 3 pillars of the NPPF's definition of sustainable development, delivering social, environmental and social benefits.
- 3.11 The sensitive, and thoughtful landscape led design will ensure that the proposed development integrates well into its surroundings. The generous open space provision forms an important part of the masterplan, providing critical green and blue infrastructure in the form of amenity provision, movement corridors, water/flood management and facilitating the enhancement of biodiversity. It has also been designed to preserve and reinforce framed views of the historic St Mary's Church.
- 3.12 The proposed development will make a significant and effective contribution towards meeting housing needs, in a District that is currently unable to meet its housing requirements. It will also provide much needed affordable homes, in the form of First Homes, to help people struggling to purchase their first home.
- 3.13 At the same time, the development will create a balanced and vibrant community whereby residents are not solely restricted to using a car. A series of initiatives are proposed as part of the development to promote sustainable transport modes, including enhancements to local bus stops and enhancements to the footway along the existing highway verge on the A228 Sharnal Street.

- 3.14 Other social benefits include increasing the recreational value of the site, providing publicly accessible open space and play areas; providing electrical charging points and contributing towards traffic calming measures along Fenn Street/Ratcliffe Highway.
- 3.15 The application was accompanied by a thorough assessment, including a number of specialist technical advisors and consultant reports. This included; Landscape and Visual Impact Assessment, Preliminary Ecology Appraisal, Transport Assessment, Flood Risk Assessment, Noise Statement, Arboricultural Survey and Impact Assessment, Archaeological Desk-Based Assessment, and Air Quality Assessment.
- 3.16 The Planning Statement also examined the other range of issues that need to be considered in relation to the proposals including highways, archaeology, noise, air quality, ecology, and flood risk, and finds that the development is acceptable and can be achieved whilst complying with national and local policies. There are no technical objections outstanding to the application - demonstrating that the site is suitable to come forward.
- 3.17 The proposals represent a high-quality sustainable development that accords with the relevant planning policies of the Development Plan and other material considerations including the NPPF and, as such, the proposal should be supported.

**ii) Land at Stoke Road, Hoo (Policy Allocation HHH33)**

- 3.18 The Site is located immediately east of Hoo St Werburgh village which benefits from a wide range of services. The Site comprises of 10.34 hectares of land in arable use in addition to a now disused sports club building and associated field, known as the former Sturdee Club. The Site is defined in 3 distinct parcels: Parcel A: The Western Parcel, Parcel B: The Northern Parcel located on the northern site of Stoke Road, and Parcel C: The Eastern Parcel, The Site Location Plan is included within Appendix B.
- 3.19 Land at Stoke Road has been identified as part of the previous Hoo Development Framework consultation document in connection with the wider Hoo growth proposal. The Site extends to the existing edge of Hoo (with the adjacent field having received Outline planning permission for 100 dwellings) and extends towards Jacobs Lane and beyond.
- 3.20 The Site was submitted to the Call for Sites for approximately 330 dwellings, including policy compliant affordable housing plus commercial uses for up to 22,000sqft which could include offices, gym, a children's nursery, retail, open spaces and landscaping.

- 3.21 A Full planning application was submitted in December 2023 for the demolition of the Sturdee Club and associated structures and erection of 134no. residential dwellings (including affordable and over 55's homes), children's nursery (Class E(f)), café/community hub (Class E(b)/F2(b)) and commercial/retail floorspace (E(g)/E(a)), new public open spaces, sustainable urban drainage systems, landscaping and biodiversity areas and play areas. Assess to be from 4no. new location from Stoke Road. Provision of roads, parking spaces and earthworks (Ref: MC/23/2857).
- 3.22 . As part of the DAS submitted in support of the application, a comprehensive masterplan was provided to demonstrate how the how Site could come forward. The central parcel of the Site is the missing parcel to complete the whole development. The central parcel is still available to come forward within the Plan period. A copy of the comprehensive masterplan is shown below.

**Figure 3.1: Land at Stoke Road, Hoo – Comprehensive Masterplan**



- 3.23 An extensive programme of community engagement was undertaken by both the Landowner and Esquire Developments incl. pre-application engagement with Medway planning department, pre-application engagement with Medway highway department, pre-application meeting with Hoo St Werburgh and Chattenden Parish Council, and public consultation in the form of a Public Exhibition.



- 3.24 The Site represents a logical extension to Hoo and is located in an area whereby traffic can be directed away from the village along the Ratcliffe Highway to exist the Peninsula. Accordingly, only local, purposeful trips to Hoo village will be generated.
- 3.25 The Council should acknowledge that bringing forward large scale developments in and around Hoo over the Plan period will require a phased approach and that it should remain focused on delivering the long-term vision by the end of the Plan period. It should therefore take the opportunity of what is available to be brought forward immediately now, knowing that the Local Plan will encourage and direct areas to come forward over the longer term.
- 3.26 The Planning Statement submitted alongside the application demonstrates that the housing shortfall across Medway District is significant and persistent. Paragraph 1.1d? of the NPPF should be engaged and the application approved unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits.
- 3.27 The Site is located in an area which is already in the process of being transformed by new development, with the western parcel of the now immediately adjoining the physical settlement boundary. A development of this size and nature will not therefore be out of context with the surrounding area.
- 3.28 The landscape led design response helps to successfully assimilate the development into its surroundings. The generous open spaces form an important part of the masterplan, acting as strong place markers as well as providing critical green and blue infrastructure, in the form of amenity provision, movement corridors, water/flood management and facilities the enhancing of biodiversity. The proposed green space in Parcel A has also been specifically designed to reinforce the position and legibility of the Hoo Stop line, preserving framed views along the course of this 'line'.
- 3.29 The Planning Statement has also examined the other range of technical issues that need to be considered in relation to the proposals including highways, heritage, archaeology, noise, contamination, air quality, ecology, flood risk, land use, and sustainability and finds that the development is acceptable and can be achieved whilst complying with national and local planning policies.
- 3.30 There are very significant benefits arising from the proposal which must be given considerable weight in the decision-making process. These benefits include:
- Providing much needed homes for local people in a borough that is currently unable to meet its housing requirement;

- Providing much needed affordable housing for people struggling to purchase a home;
- Providing much needed housing for the over 55s;
- Providing other uses to create a balanced and vibrant community whereby residents are not solely restricted to using the car;
- The community hub/café in particular will provide an identifiable focal point for the local community;
- Enhancing an appreciation of the Stop Line and associated historical structures;
- Supporting the growth of the local economy through job creation during not only the construction phase of the development but by providing a mix of uses on site;
- Providing new links and connections to the existing footpath network;
- Creating publicly accessible open spaces and play areas;
- Increasing the recreational value of the site and delivering significant biodiversity net gain;
- Positively addressing climate change by bringing forward an all-electric development by way of a fabric first approach and Air Source Heat Pumps (i.e. no gas Boilers). The overall effect will be approximately 50% in carbon reduction over and above current Building Regulations; and
- The development being brought forward by a local SME.

3.31 The supporting documents and plans submitted as part of this application have demonstrated that the proposal represents a high-quality sustainable development that accords with the relevant planning policies of the Development Plan and other material considerations including the NPPF and, as such, the proposal should be supported.

3.32 To date, there are no outstanding technical matters relating to the site itself other than comments received from Highways England in which these are expected to be resolved either through site specific evidence or as part of the wider growth strategy for the local plan.

### **iii) Land west of Edinburgh Road, Isle of Grain (Policy Allocation AS25)**

3.33 The site lies to the southeast of Grain Road and to the west of Edinburgh Road, at the edge of the built-up extent of the Isle of Grain. The Site extends to approximately 0.98ha and comprises former agricultural land. A Site Location plan is included within Appendix C.

3.34 The northern and western boundaries of the Site are defined by Grain Road and Chapel Road, which is the main access route into the village and lined with residential development. The

southern extent of the site immediately borders agricultural land. The eastern boundary borders the existing residential development along Edinburgh Road and Chapel Road, alongside the Fire Station.

- 3.35 The Site was submitted by the Landowner to the Call for Sites process for approximately 30 dwellings on Land at Grain Road, Isle of Grain (Ref: AS25). The Site presents a good opportunity to deliver homes in a location which would benefit from small scale appropriate-level development. The Site would comfortably accommodate this quantum of development and is a logical extension to the village of Grain, which due to nearby employment opportunities, is likely to attract existing and future workforce to relocate to this part of Medway over the coming years.
- 3.36 The Site would be a logical extension to the village and being brought forward by an SME, would help set a design bar within the village for future development if it were brought forward early in the Local Plan period/process.
- 3.37 A Full planning application was submitted in June 2024 for the erection of 34 dwellings including access, parking, landscaping, open space and associated infrastructure and earthworks. The development will be delivered by Esquire Development on behalf of MHS Homes. The scheme will provide 100% affordable housing (Ref: MC/24/1289).
- 3.38 An extensive programme of community engagement was undertaken by both the Landowner and Esquire Developments incl. pre-application engagement with Medway planning department, pre-application meeting with St James, Isle of Grain Parish Council, and public consultation in the form of a Public Exhibition.
- 3.39 Overall, the supporting assessment of the application, demonstrates that the proposals are acceptable, delivering a quantum of high-quality development that is entirely suitable for the Site and is in keeping with the local area.
- 3.40 The scheme would deliver a 100% affordable scheme providing 34 affordable homes for which there is a dire need. Medway has a significant affordable housing need, having only delivered 18% of its affordable housing quota in the 2022/23 period, which was preceded by consistent under delivery of affordable housing. The proposed development would make a substantial contribution to this affordable need.
- 3.41 The supporting documents and plans submitted as part of this application have demonstrated that the proposal represents a high-quality sustainable development that accords with the

relevant planning policies of the Development Plan and other material considerations including the NPPF and, as such, the proposal should be supported.

**iv) Summary**

3.42 We support the allocation of these three sites.

3.43 All three sites present an excellent opportunity for allocation and would support the focus of the 'blended strategy' which requires a number of greenfield sites to come forward within suburban and rural locations to support the brownfield regeneration. Furthermore, these allocations help to distribute the development across the Hoo Peninsula.

3.44 The above three sites therefore all represent sustainable, suitable and deliverable sites, all being brought forward by an SME housebuilder with an excellent track record of design and delivery in Medway. They each offer a development that is bespoke to that area and offer the opportunity to enhance and grow these locations in a positive way that complements the local character and area.



## 4.0 DEVELOPMENT MANAGEMENT POLICIES

- 4.1 We have reviewed the Development Management Policies and provide the following detailed comments as set out within the table below.
- 4.2 As a general point, we believe that the length of policies within the Plan are too lengthy, and a lot of the text contained within the policies can be included within the supporting text. At present, there is too much text, which in practice, will prove difficult for the decision makers.

<b>Regulation 18 Local Plan Policy</b>	<b>Our Comments</b>
Policy S1: Planning for Climate Change	We support this principle of this policy. However, we consider that the policy as currently drafted is too prescriptive, and over burdening. The policy requires consideration to how proposals will mitigate climate change (which we support in principle) however it is worded in such a way that it could be read that all developments need to consider the entire list of 13 requirements, no matter the type or scale of development. Policy S1 should therefore be redrafted to identify how developments of a certain scale would be expected to achieve certain adaptations and/or mitigations.
Policy S2: Conservation and Enhancement of the Natural Environment	We support this policy. We support the requirement within this policy for development to require a 10% biodiversity net gain, in accordance with the Environment Act 2021. We do not consider that the Council should seek to ensure a higher percentage of BNG. The NPPG (Para 006, Reference ID: 74-006-20240214) states that plan-makers should not seek a higher percentage than the statutory objection of 10% BNG, either on an area-wide basis or for the specific allocation for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage. Consideration will also need to be given to how the policy will be implemented. Currently, there is not supporting evidence that demonstrates a higher percentage is justified.
Policy S3: North Kent Estuary and Marshes designated sites	We support this policy. Our first comment on this policy relates to the second paragraph that requires new residential development for larger schemes outside of the 6km Zone of Influence may also need to secure appropriate mitigation. There is no indication on the definition of what constitutes a 'larger scheme'. Our second comment relates to the third paragraph which requires all development which is located within close proximity to the North Kent Estuary and Marshes designated sites may also need to provide further mitigation. There is no indication what constitutes 'close proximity'.

	The policy is to be redrafted to clarify these points.
Policy S4: Landscape Protection and Enhancement	We support this policy. We expect to see a map as part of the Local Plan progress to denote the areas of high and low landscape sensitivity.
Policy S5: Securing Strong Green and Blue Infrastructure	We support this policy.
Policy S6: Kent Downs Area of Outstanding Natural Beauty National Landscape	We support this policy.
Policy DM1: Flood and Water Management	We support this policy.
Policy DM2: Contaminated Land	We support this policy.
Policy DM3: Air Quality	We support this policy.
Policy DM4: Noise and Light Pollution	We support this policy.
Policy S7: Green Belt	We support this policy.
Policy T1: Promoting High quality Design	We support this policy.
Policy DM5: Housing Design	We support this policy. We suggest that further clarification is provided for bullet point 3 which requires all new accommodation to incorporate dementia friendly standards where required. There is no further clarification on how the 'where required' will be communicated. As such, we suggest that the policy wording is amended to reflect a trigger that therefore requires dementia friendly standards to apply.
Policy DM6: Sustainable Design and Construction	We support this policy.
Policy DM7: Shopfront Design and Security	We support this policy.
Policy DM8: Advertisements	We support this policy.
Policy S8: Historic Environment	We support this policy.
Policy DM9: Heritage Assets	We support this policy.
Policy S9: Star Hill to Sun Pier	We support this policy.
Policy DM10: Conservation Areas	We support this policy.

Policy DM11: Scheduled Monuments and Archaeological Sites	We support this policy.
Policy T2: Housing Mix	<p>We support this policy.</p> <p>We support that the policy has not outlined a specific housing mix as this would be too prescriptive and would not allow for sites to deliver bespoke schemes reflective of the local character and the market.</p> <p>However, the housing mix of development will only be permitted where the mix is compliant with the LHNA, or updated reports. LHNA's are only sporadically updated as part of Local Plan evidence bases.</p> <p>Planning policies should be flexible and have the ability to respond quickly to changes in the market. As such, there needs to be greater flexibility within the policy wording to allow for updated, localised assessments of housing mix requirements to be supported to allow for variation in the housing mix. We therefore suggest that the policy wording is amended to this effect.</p>
Policy T3: Affordable Housing	<p>We support this policy.</p> <p>We support the requirement for all developments of 10 or more dwellings. The policy sets out the required tenure mix based on the latest LHNA. As currently drafted, the policy is too prescriptive, and does not allow for developments to reflect the market conditions at that time. The policy therefore should be redrafted to allow for greater flexibility in the mix of tenures to be provided with the aim to provide in accordance with the LHNA.</p>
Policy T4: Supported Housing, Nursing Homes and Older Persons Accommodation.	We support this policy.
Policy T5: Student Accommodation	We support this policy.
Policy T6: Mobile Home Parks	We support this policy.
Policy T7: Houseboats	We support this policy.
Policy T8; Houses of Multiple Occupation	We support this policy.
Policy T9: Self-build and Custom Housebuilding	<p>We partially support this policy.</p> <p>The requirement for 4% self and custom build requirement on developments of more than 100 dwellings is not supported. There is currently no review mechanism within the policy that allows for the removal of the requirement for self or custom build where there is no demand at the point the planning permission is sought.</p> <p>We support the requirement for a design code when the number of self-build plots exceed 10.</p> <p>We support the process outline for the marketing of self/custom build development.</p>

Policy T10: Gypsy, Travellers & Travelling Showpeople	We support this policy.
Policy T11: Small Sites and SME Housebuilders	<p>We support the inclusion of the Policy.</p> <p>Whilst we support the principle of the policy, we suggest that amendments are made to ensure that the policy is workable in practice.</p> <p>The policy encourages that development of small housing sites. However, this should include wording consistent with windfall or unallocated small-scale housing. At present, it is not clear if this policy only relates to allocated housing developments. The allocated sites included as part of this Reg 18 consultation do not yet provide the yields. Therefore, it is not possible to understand if there are currently sufficient allocated small sites to meet the requirement of Para 70 of the NPPF.</p> <p>As such, the policy needs to be amended to ensure that there is greater flexibility for small sites in sustainable location around Medway to come forward and meet their housing requirement.</p>
Policy S10: Economic Strategy	We support this policy.
Policy S11: Existing Employment Provision	We support this policy.
Policy S12: New Employment Sites	We support this policy in principle, subject to further information to be provided as part of the Regulation 19 consultation.
Policy S13: Innovation Park Medway	We support this policy.
Policy T12: Learning and Skills Development	We support this policy.
Policy T13: Tourism, Culture and Visitor Accommodation	We support this policy.
Policy S14: Supporting Medway's culture and creative industries	We support this policy.
Policy T14: Rural Economy	We support this policy.
Policy S15: Town Centres Strategy	We support this policy.
Policy S16: Hierarchy of Centres	We support this policy.
Policy T15: Sequential Assessment	We support this policy.
Policy T16: Ancillary Development	We support this policy.
Policy T17: Impact Assessment	We support the principle of this policy. However, further consideration needs to be given for the need for retail

	infrastructure to support the existing and future residents of the Hoo peninsula. Therefore, additional sites need to be allocated for retail provision on the Hoo Peninsula.
Policy S17: Chatham Town Centre	We support this policy.
Policy S18: Rochester District Centre	We support this policy.
Policy S19: Gillingham District Centre	We support this policy.
Policy S20: Strood District Centre	We support this policy.
Policy S21: Rainham District Centre	We support the principle of this policy. However, suggest that a Masterplan for Rainham is produced, that is consistent with the Masterplans for the other 4 towns identified within the Hierarchy of Centres.
Policy S22: Hoo Peninsula	We support this policy in principle. There is a clear evidenced need for additional retail provision on the Hoo Peninsula. However, no further work has since been undertaken to identify the different types of retail required, their size, or allocated land to meet this deficiency. As such, the policy should be reworded to allow for sites to be allocated as part of the Reg 19 Consultation that specifically address the retail requirements.
Policy S23: Hempstead Valley District	We support this policy.
Policy DM12: Local and Rural Centres	We support this policy.
Policy T18: Shopping Parades and Neighbourhood Centres	We support this policy.
Policy T19: Meanwhile Uses	We support this policy.
Policy DM13: Medway Valley Leisure Park	We support this policy.
Policy DM14: Dockside	We support this policy.
Policy DM15: Monitoring and Managing Development	We support this policy.
Policy T20: Riverside Path	We support this policy.
Policy DM16: Chatham Waters Line	We support this policy.
Policy DM17: Grain Branch	We support this policy.

Policy T21: Riverside Infrastructure	We support this policy.
Policy T22: Marinas Moorings	We support this policy.
Policy T23: Aviation	We support this policy.
Policy T24: Urban Logistics	We support this policy.
Policy T25: User Hierarchy and Street Design	We support this policy.
Policy T26: Accessibility Standards	We support this policy.
Policy DM18: Transport Assessments, Transport Statements and Travel Plans	<p>We support this policy in principle. However, the opening paragraph requires a TA or TS when development will generate a significant amount of movement. There is a need to define what a significant amount of movement is.</p> <p>We raise concerns with the Area-wide Travel Plan for the Hoo Peninsula. We support the principle of a travel plan for Hoo, however, this plan is not the subject of this consultation. Furthermore, we do not know how this will impact the delivery of residential development on the Hoo Peninsula, and as such what impact this may have on the ability of Medway to meet their housing requirement.</p> <p>We support the requirement of Travel Plans.</p>
Policy DM19: Vehicle Parking	We support this policy.
Policy DM20: Cycle Parking and Storage	We support this policy.
Policy T27: Reducing Health Inequalities and Supporting Health and Wellbeing	We support this policy.
Policy T28: Existing Open Space and Playing Pitches	We support this policy.
Policy DM21: New Open Space and Playing Pitches	We support this policy.
Policy T29: Community and Cultural Facilities	We support this policy.
Policy S24: Infrastructure Delivery	We support this policy.
Policy DM22: Digital Communication	We support this policy.
Policy T30: Safeguarding Mineral Resources	We support this policy.
Policy T31: Safeguarding of Existing Mineral Supply Infrastructure	We support this policy.



Policy T32: Supply of Recycled and Secondary Aggregates	We support this policy.
Policy T33: Extraction of Land Won Minerals	We support this policy.
Policy DM23: Waste Prevention	We support this policy.
Policy T34: Safeguarding of Existing Waste Management Facilities	We support this policy.
Policy T35: Provision of Additional waste Management Capacity	We support this policy.
Policy T36: Location of Waste Management Facilities	We support this policy.
Policy T37: Other Recovery	We support this policy.
Policy T38: Non-inert Landfill	We support this policy.
Policy T39: Beneficial Use of Inert Waste by Permanent Deposit	We support this policy.
Policy T40: Wastewater Treatment	We support this policy.
Policy S25: Energy Supply	We support this policy.
Policy T41: Heat Networks	We support this policy.

## **Appendix A**

Land adjacent to Fenn Street and Ratcliffe Highway



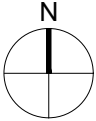
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Illustrated information from 3rd party consultants/specialists is shown as indicatively only. See other consultant / specialist drawings for full information and detail.

All aspects of the architectural design concerning fire performance / fire safety (whether or not illustrated / annotated) are to be considered as 'For Approval' only, irrespective of the drawing status / suitability.



Revision Note & Date				Amended	Checked
Rev	Date	Note			

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Project Title  
Proposed Residential Development, Land adjacent  
to Fenn Street and Ratcliffe Highway, Fenn Street

Clients Details  
Esquire Developments Ltd

Drawing Title  
Site Location Plan

BIM Number			
-			
Scale	Date	Drawn	Checked
1:1250@A3	Feb 2024	GA	RDT

Drawing Status  
**PLANNING**

Project No.	Drawing No.	Status	Revision
23.018	10	P	-

**Appendix B**  
Land at Stoke Road, Hoo



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Proposed Mixed Use Development, Land at Stoke Road

NOTES:

Report all discrepancies, errors and omissions.

Verify all dimensions on site before commencing any work on site or preparing shop drawings.

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For all specialist work, see relevant drawings.

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Rev	Date	Description
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Project Title

Proposed Mixed Use Development  
Land at Stoke Road  
Hoo

Drawing Description

Site Location Plan

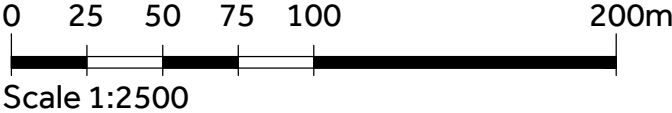
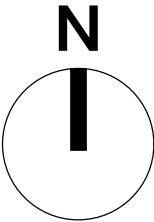
Scale	Drawn by
1:2500 @ A3	JJH
Date	Checked by
December 2023	TWM

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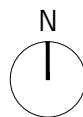
CANTERBURY      LONDON      HARPENDEN

Drawing Number	Revision
30157A / 01	



## **Appendix C**

Land west of Edinburgh Road, Isle of Grain



1:1250m



#### Notes:

Do not scale. All dimensions are in millimetres unless otherwise stated. This drawing should be read in conjunction with all relevant project information and contract documentation. All dimensions to be checked prior to fabrication and or commencement of works. All works to comply with all relevant legal standards, building regulations and warranty provider requirements. Report any discrepancies, if in doubt ask.

#### Revisions:

Rev	Status	Date	Description	Dwn	Chkd
C01	A3	14.06.24	Planning Issue	JH	CD

Client Name:

ESQUIRE DEVELOPMENTS

Project Name:

Land West of Edinburgh Road, Isle of Grain

Drawing Name:

Location Plan

Drawing Number:

IOG-BPTW-S01-00-DR-A-0100

Rev:

C01

Status:

A3

Project No:

23-152

RIBA Stage:

03

Drawn By:

JH

Scale:

1:1250 @ A4

## PLANNING ISSUE

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