Land South of Lower Rainham Road

Medway Local Plan Examination – Stage 2

Matter 13 - Policy SA10

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PREPARED FOR

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Contents

Contents

1. Introduction 2

2. Response to the Inspectors Questions 3

3. Conclusion 6

Appendix A - Committee Sites Plan December 2016 7

Contact 8

1. Introduction

1.1 This Hearing Statement has been prepared by Savills on behalf of Catesby Strategic Land Ltd and references their land interests at Site RN5 Land South of Lower Rainham Road. RN5 extends to approximately 30 hectares and lies immediately west of the allocated Rainham Parkside Village, site allocation (RN9). Catesby has promoted RN5 throughout the plan-making process and submitted detailed representations at Regulation 18, Regulation 19 and at Stage 1 of the Examination. This statement now responds to the Inspector's Stage 2 questions and specifically focusses on Policy SA10.

1.2 Catesby supports strategic growth at Lower Rainham in principle. However, the submitted plan fails to demonstrate that the extent of development proposed, the site boundaries selected and the exclusion of RN5 represents the most appropriate strategy when assessed against reasonable alternatives. This is particularly so when more sensitive green belt release elsewhere in the administrative area has been chosen as a key strategy to deliver a significant proportion of the required housing growth instead of maximising the returns from non-Green Belt sites such as RN9 and RN5.

2. Response to the Inspectors Questions

Q13.119 What evidence demonstrates that the level of development at Lower Rainham (up to 863 new homes), as set out within Policy SA10, represents the most appropriate strategy?

2.1 The sustainability appraisal identified the wider North of Rainham area was capable of accommodating between 2,560 and 3,275 dwellings. Despite this, the Local Plan allocates only approximately 863 dwellings at Lower Rainham. The Council has not explained why growth was constrained to this level nor how the final level of growth emerged from the assessment process. The evidence instead indicates that this area performs well against sustainability objectives and is capable of accommodating significantly greater development. Catesby therefore considers that the submitted strategy has not been shown to be the most appropriate when considered against alternatives. It is very relevant to look back at a plan produced by Medway Council 10 years ago (attached at **Appendix A**, dated 14th December 2016) which even at that stage identified this Lower Rainham area as a whole as having potential for more significant development.

Q13.120 What reasonable alternatives were considered and why were the allocated sites selected??

2.2 A key concern throughout the plan process has been the failure to test a coordinated RN5 and RN9 growth option. RN5 and RN9 share similar characteristics and constraints. The Council concluded that RN9 could overcome landscape, heritage and coalescence concerns, yet reached the opposite conclusion for RN5 without a robust evidential distinction. A combined allocation would facilitate a more coherent masterplan, broader infrastructure base and increased housing delivery. The Sustainability Appraisal therefore failed to test a reasonable and obvious alternative.

Q13.121 What role does Lower Rainham, and its component site allocations (RN9, RN17, RN23 and RN25) play in contributing to and delivering the Plan's wider development strategy?

2.3 Lower Rainham is one of the principal suburban growth opportunities available to Medway outside the Green Belt. The area can deliver market and affordable housing, support education and transport infrastructure and contribute towards addressing identified housing shortfalls. Given the acknowledged constraints affecting many brownfield sites, growth at Lower Rainham can play a particularly important role in ensuring flexibility and resilience in the housing trajectory.

Q13.122 How do the individual site allocations at RN9, RN17, EN23 and RN25 and the overall SA10 allocation relate to the existing urban area and settlement pattern?

2.4 The wider Lower Rainham area is characterised by a dispersed pattern of development, rural lanes, orchards, paddocks and small hamlets. The Vision Framework previously prepared by Catesby demonstrates how growth can follow this established morphology through a series of development clusters separated by substantial green infrastructure. Such an approach within a wider allocation covering RN9 and RN5 could reinforce local character rather than replicate a conventional suburban expansion. A larger scheme would enable a more meaningful enhancement to public transport infrastructure serving this area, providing a sustainable and viable base for permanent changes to bus routes to include this area as a greater quantum of dwellings would provide greater custom for long term route retention by the bus operators.

Q13.123 Are the proposed development limits and site boundaries justified?

2.5 The proposed development limits are not adequately justified. The policy seeks to create a defensible western boundary to prevent development west of Rainham Parkside Village. This approach is policy-

led rather than evidence-led. A boundary should respond to landscape character and environmental considerations rather than pre-emptively excluding otherwise suitable development land. The exclusion of site RN5 does not appear to be justified when considered alongside the evidence submitted through the Local Plan process.

Q13.124 What evidence is there to demonstrates that the allocations in Policy SA10 can be developed both individually and cumulatively without unacceptable effects on landscape character?

2.6 Landscape issues have featured prominently in consideration of development in this area of Lower Rainham. Catesby acknowledges the sensitivity of the area. However, the evidence prepared by LDA Design demonstrates that a broader landscape-led masterplan can successfully accommodate development whilst strengthening landscape quality. Catesby's proposed concept introduces woodland extensions, community orchards, a new country park, extensive green links and clear separation between development clusters. Importantly, it responds directly to guidance contained within the Landscape Character Assessment by maintaining a green backdrop to the estuary and reinforcing the existing landscape grain. By contrast, the submitted concept for Rainham Parkside Village appears driven primarily by available development parcels and infrastructure requirements. The allocation would benefit from a wider strategic framework which is broadened to include site RN5.

Q13.125 How have heritage assets, their settings and archaeological interests informed the overall allocation within Policy SA10?

2.7 Given the heritage assets in this area it is considered that these can be appropriately protected through the incorporation of stand-off distances, landscape buffers, retention of orchards and overall sensitive design. Archaeological investigation can be addressed through the normal planning application process. Heritage considerations could come hand in hand with a landscape-led approach for the wider area covering sites RN9 and RN5.

Q13.126 How will important views, green infrastructure assets and heritage interests be protected or enhanced?

2.8 The Catesby Vision Framework for RN5 identifies a comprehensive green infrastructure network occupying more than half the promotion area. This includes publicly accessible open space, country park provision, improved links to Riverside Country Park and new orchard planting. These measures would protect important views, maintain the landscape setting of heritage assets and create long-term environmental benefits. Such an approach should be equally adopted within the masterplan for site RN9.

Q13.127 Are the policy requirements within Policy SA10 sufficiently precise to secure those outcomes?

2.9 Whilst many objectives within Policy SA10 are supported, several elements are overly restrictive and insufficiently flexible. In particular, the requirement for a landscape buffer to inhibit development west of the allocation is unjustified. A more effective policy would focus on outcomes, requiring development proposals to respect landscape character, heritage assets and settlement identity rather than imposing an absolute restriction.

Q13.128 What transport improvements are required to support the development within the allocation?

2.10 Necessary transport measures include improvements to walking and cycling routes, enhancement of bus services, better connections to Riverside Country Park, enhancement of the connections between Rainham railway station and the site and mitigation works identified through the Strategic Transport Assessment. A coordinated development strategy for RN9 and RN5 would support delivery of these measures more effectively and in particular ensure the long-term retention of the enhanced bus services as it would ensure greater custom.

Q13.129 How will sustainable travel choices be promoted?

2.11 The wider Lower Rainham vision places significant emphasis upon active travel. New pedestrian and cycle connections, a potential circular bus route linking to Rainham Railway Station, improved access to National Cycle Network routes and provision of local services which would all reduce reliance on private vehicles to service the day to day needs of future residents. The area presents one of the best opportunities in Medway to secure meaningful modal shift within a suburban expansion location so long as these measures remain viable in the long term.

Q13.130 Is the necessary infrastructure deliverable within the timescales envisaged?

2.12 Significant concerns remain about whether the infrastructure package associated with SA10 can be funded and delivered solely through approximately 863 dwellings being delivered as a series of parcels reliant on a number of different SME developers. The Infrastructure Delivery Plan does not clearly identify all requirements arising from the allocation. The inclusion of RN5 as part of this allocation would increase dwelling numbers, improve viability and create an improved funding base for strategic infrastructure.

General Questions

Q13.161 Taking Policies SA7 to SA12 collectively, is there sufficient certainty that the necessary transport, utilities, water, wastewater, education, healthcare, green infrastructure and environmental mitigation measures will be delivered in step with development?

Q13.162 Is the cumulative impact of the allocations on the strategic road network, designated ecological sites, landscape character, infrastructure provision and public services adequately understood and addressed?

Q13.163 Are any main modifications necessary to ensure the allocations within Policies SA7 to SA12 are effective, justified and consistent with national policy?

2.13 The cumulative impacts of the strategic allocations are not fully understood because the Council has failed to assess a wider Lower Rainham growth option. Greater confidence regarding transport mitigation, infrastructure funding and environmental enhancement could be achieved through coordinated masterplanning with sites RN5 and RN9 coming forward together as an allocation under policy SA10. Catesby therefore recommends consideration of the following Main Modifications:

- reassess the growth potential of North Rainham and allocate sites RN5 and RN9 together under Policy SA10 as a larger combined strategic site. This will strengthen the deliverability of infrastructure funding and enable more coordinating phasing with greater certainty on deliverability with less reliance on SME developers in isolation to deliver the much-needed strategic growth; and
- revise the updated Policy SA10 to support a landscape-led approach across this wider allocation.

3. Conclusion

3.1 Catesby supports the principle of strategic growth at Lower Rainham. However, the evidence demonstrates that the submitted allocation is not the most justified or effective option. A coordinated strategy with sites RN5 and RN9 coming forwards together as a wider site allocation under Policy SA10 would provide additional housing, improved infrastructure delivery, stronger landscape outcomes and a more robust response to identified housing needs. Accordingly, the Plan should be modified to accommodate greater growth within the Lower Rainham area.

END

Appendix A - Committee Sites Plan December 2016

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