

Medway Local Plan: EIP Hearings

Response to Questions

Reg 20 Submission ID: E.47 / E.134

INSPECTORS' MATTER 2 – VISION, SPATIAL DEVELOPMENT STRATEGY AND STRATEGIC OBJECTIVES

Spatial Development Strategy

Q2.4 What are the key factors that informed and shaped the selection of the spatial development strategy of the Plan over other reasonable approaches?

- I.1 Esquire Developments has a commercial interest in allocations RN9 (Rainham Parkside Village), HHH6 (Land north-west Ratcliffe Highway, Chattenden) and HHH19 (Deangate Retail Park, Flanders Farm). It is also forms part of the Hoo Consortium, owing to Sites HHH6 and HHH19. The Hoo Consortium has submitted comments separately.
- I.2 All sites were promoted through the Council's Call for Sites and are included in the Council's Land Availability Assessment (ID: B1, pgs. 1726, 336 and 400).
- I.3 The Local Plan's Spatial Development Strategy (ID: A1, Section 3) seeks to meet Medway's development needs in full by prioritising sustainable growth which is evenly distributed to reduce the need to travel and provide a good range of services with supporting infrastructure across Medway.
- I.4 The Spatial Development Strategy was informed by several options during the Plan progression, set out in the Sustainability Appraisal (SA) (ID: A3.2, Section 5). The preferred growth strategy, Option "3. Blended Approach", was demonstrated by the SA as the most sustainable, ensuring a balance between the urban, suburban and rural development, meeting the needs of communities and promoting sustainable transport, taking account of the outputs of the Land Availability Assessment (ID: B1), which identified the aforementioned Sites as "suitable", "available" and "achievable".
- I.5 Options considered included testing the allocation of Site RN9 as a reasonable alternative (ID:A3.2, pg 35). Its inclusion in the Plan was demonstrated to be necessary (ID: A3.2, pg 33)

- I.6 to address the shortfall in housing provision following the subsequent rejection of a strategic site included at the Reg 18 Plan (site RSE10). Site RN9 also delivers essential infrastructure (primary and secondary school site), as identified in the Infrastructure Delivery Plan (ID: B2) and performs well against the overall sustainability criteria in the SA (ID: A3.2, Table 6.3).
- I.7 This spatial approach has therefore been tested together with reasonable alternatives with the SA and found to be the most sustainable Spatial Development Strategy.

Q2.5 How does the Plan set out the reasons and justification for selecting the preferred spatial development strategy?

- I.8 The Blended Approach promotes a brownfield first approach, supporting urban regeneration, complemented by suburban and rural greenfield sites to provide a wide housing choice and distribute development, which is a necessary component of the Spatial Development Strategy. This option meets the strategic objectives of the Plan by striking a balance between urban regeneration and suburban/rural development, reflective of the Land Availability Assessment (ID: B1), to ensure that economic needs can be met (Objective 12) and that new development is fit for use for future needs of residents, with a range of tenures (Objective 7).
- I.9 This spatial approach has been tested against reasonable alternatives and found to be the most sustainable Spatial Development Strategy. The reasons and justification for this are as set out in the Spatial Strategy Overview in the Local Plan (ID: A1, Section 3.1).

Q2.6 How does the spatial development strategy respond to the key constraints and opportunities across Medway and how is this reflected in policy requirements?

- I.10 In the case of strategic site allocations, the site allocation policy's identify infrastructure that development will need to deliver, responding to wider infrastructure needs/constraints as identified in the Infrastructure Delivery Plan (ID: B2). Where necessary policies also include identifying where environmental mitigation through consideration of impacts on the local landscape and any ecology designations, will also need to be considered (example Policy SA10).

Q2.9 How does the Plan ensure that the strategic objectives are capable of being delivered within the Plan period?

- 1.11 In the case of allocated sites RN9, HHH6 and HHH19, Esquire Developments has worked closely with the Council to ensure the proposed allocations align with the strategic objectives, delivering housing alongside mixed use centres, employment, retail, health care and education.
- 1.12 The delivery of these Sites will make a significant contribution to the Local Plan's Strategy Objectives (ID: A1, Section 2.2) and enable sustainable growth to be distributed across Medway, in line with the spatial strategy.

Q2.10 The Plan sets out that the spatial distribution of new development within Medway is circa. 40% urban regeneration; circa 30% suburban and circa 30% rural (mainly on the Hoo Peninsula). Please could the Council explain, with reference to the evidence submitted, how and why this spatial distribution is the most sustainable, deliverable and therefore appropriate approach to the delivery of new development during the Plan period.

- 1.13 The spatial distribution of new development is informed by the Land Availability Assessment (ID: B1), which demonstrates that there is insufficient urban regeneration sites to deliver the level of growth required. To ensure the Plan is deliverable development outside these areas is therefore demonstrated to be necessary. As evidenced in the Housing Needs Assessment (ID: B10, pg 112) a high proportion of family homes are required to be delivered, which are also unlikely to be met through urban regeneration sites.
- 1.14 Development in suburban and rural locations provides the opportunity to ensure development needs are met, by providing for a more diverse range of sites, as well as delivering opportunities to enhance the sustainability of these locations by securing the provision of new infrastructure which also addresses identified shortfalls, as identified in the Village Infrastructure Audit (ID:B3).
- 1.15 Site allocations RN9, HHH6 and HHH19 have been assessed throughout the progression of the Plan and concluded to be deliverable by the Land Availability Assessment (ID: B1). These allocations demonstrate how sustainable development can be achieved in suburban and rural locations (in Rainham and Hoo) and can successfully deliver a range of uses including residential, employment, community and retail to meet the spatial objectives of the Plan.
- 1.16 As development comes forward in these locations, supporting infrastructure will be secured and delivered (ID: B2 - Infrastructure Delivery Plan) & ID 18.1 - Transport Modelling), to

mitigate their impact and benefit the accessibility and availability of services for existing and future residents of Medway.

- 1.17 The allocation of the Sites has been informed by collaboration with the Council, with applications on all three sites to be made before the end of 2026.

Q2.11 In what way were reasonable alternative development strategies considered and assessed during the plan-making process?

- 1.18 The reasonable alternatives are as set out in the SA (ID: A3.1-A3.3), which considered different development options throughout the SA process. Through the Local Plan consultation, alternatives were also considered as further technical refinement resulted in some sites included in the Reg 18 Plan being removed and alternative sites included, such as Site RN9, which met identified housing needs, addressed infrastructure requirements and aligned with the Council's strategic objectives.

Q2.12 How does the spatial development strategy address the requirements of different parts of Medway such as the Hoo Peninsula as well as the more urban areas?

- 1.19 As set out in the Medway Village Infrastructure Audit (ID: B3), Lower Rainham has limited-service provision. The allocation of Site RN9 and associated site allocation Policy SA10, secure the delivery of new services and infrastructure includes retail, community and health care uses which will also support the wider sustainability of the area. It also delivers on a requirement for Care Home spaces, as evidenced in the Housing Needs Assessment (ID: B10, pg 113).
- 1.20 Esquire Developments has also worked in collaboration with the Council to establish existing facilities and services in these locations, and identified the improvements required, which are as reflected in Policy SA10.