Medway Local Plan: EIP Hearings
Response to Questions
Reg 20 Submission ID: E.134

INSPECTORS' MATTER 13 – SITE ALLOCATIONS (POLICIES SA1-SA14)

Policy SA10: Lower Rainham

1.1 Esquire Developments is promoting the proposed allocation RN9 (Rainham Parkside Village), which is the key strategic site in Lower Rainham identified within Policy SA10.

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 when considered against reasonable alternatives?

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

1.2 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, pdf p.42). 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, 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.

1.3 The reasonable alternative sites have been considered in two ways, namely in regards to strategic sites and non-strategic sites.

1.4 The Council undertook the necessary Land Availability Assessment (LAA) (ID: B1) to understand and assess all available sites for consideration. The LAA is an extensive document and confirms in Appendix C that 462 sites were received for consideration. The LAA includes a stage 2 assessment (see Appendix E) confirming, based on officer professional judgement if a site was suitable for consideration as

an allocation. Site RN9 (alongside a number of other sites in Rainham) was considered (see pdf p.1726) and identified as being suitable, available and achievable.

1.5 The SA subsequently undertook 2 approaches to site consideration, strategic and non-strategic. Crucially, for the strategic sites, Appendix F (pdf p.117) undertook a detailed and thorough assessment of 27 'Reasonable Alternative Strategic Sites' and helpfully shown in Figure F1.1 (pdf p.120).

1.6 Appendix F undertakes the sustainability assessment of the strategic sites (pre mitigation), followed by Appendix I (post mitigation). Appendix G assesses non-strategic sites pre mitigation.

1.7 The SA (Appendix J - pdf p.550-569), concludes all the previous assessment and identifies that for Rainham, 35no. different development sites, totalling 3,816 new homes were considered. Through the various stages of the Local Plan process including consultations and ongoing technical input, the site allocation process was refined with 11no. sites in Rainham selected for inclusion in the Local Plan, delivering a total of 1,176 homes.

1.8 The Site Selection Topic Paper (ID: B22.1) summarises the above and provides the assessment criteria for Sites, with the SA (ID: A3.3) (Appendix J) detailing reasons for selection and rejection of alternative sites. For Policy SA10, Site RN9 was assessed as a reasonable alternative and selected following the Regulation 18b consultation, which suitably demonstrated how constraints and concerns can be addressed (ID: A3.3, Table J.1.J, p.551). Its inclusion was necessary to ensure the Local Plan was effective in meeting housing needs and based on the evidence before the officers, Site RN9 was considered to be the preferred housing site.

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?

1.9 The Rainham area is a suburban built up area as defined in the Spatial Strategy (ID: A1 - pdf p.27), and is (along with other suburban areas including Hoo St Werburgh and Chattenden, Capstone Valley and West of Strood) an appropriate location to deliver housing and mixed uses to meet the spatial strategy objectives (i.e. the

blended approach). Lower Rainham therefore plays a vital role in achieving the plans wider development strategy.

1.10 Site RN9 will deliver a local centre including convenience floorspace, a community hub and health hub to meet day-to-day needs of residents and serve the local community, with improvements to health and wellbeing through interconnected green spaces, play provision and opportunities for walking and cycling connecting beyond the site. It also delivers essential infrastructure (care, nursery, 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).

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?

1.11 Rainham Parkside Village (RN9) is a logical location for growth in the context of the urban area and settlement pattern. It will deliver a landscape-led development, guided by a rural design code that will ensure the development appropriately responds to and reflects the character and settlement pattern of Lower Rainham. Furthermore, the site is being brought forward as an SME consortium approach, sub-dividing the site into smaller parcels of development providing variation in design, character and diversification of homes, separated by green corridors and landscaping.

1.12 As set out in Esquire Developments' representation to the Regulation 19 consultation (Representation ID - E.134) and supporting DFD (Appendix A) which set out the vision for the site, the core principles that informed Policy RN9 are:

- Demonstrating the urban to rural transition;
- Creating a mosaic of "farmsteads" plots;
- Creating a new village heart with non-residential uses;
- Establishing a comprehensive active travel network defined by green corridors following the historic lanes, field lines hedgerows and tree clusters;
- Providing a green buffer along the rail-line acting as a buffer and a key east-west leisure route.

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

1.13 The proposed development limits and site boundary of Policy RN9 in the Land Availability Assessment (ID: B1, pdf p.1726) is reflective of ownership boundaries. The site boundary enables the development to come forward in accordance with the policy requirements, providing community uses, open spaces and landscape buffers and does not require any 3rd party land. The site is wholly under option with Esquire Developments and is a single landowner.

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?

1.14 The landscape effects of the sites allocated in Policy SA10 have been assessed in the SA (ID: A.3.3, paragraph K.2.10.7, pdf p.617), concluding minor negative impacts cumulatively and for Site RN9 individually, when considered against the Landscape Character Assessment (ID: B7). The SA evidence suggests without further detail on layout and design of Site RN9, a minor negative impact on the landscape cannot be ruled out, but identifies that the development will be guided by a Green Infrastructure Strategy and Rural Design Code, and informed by the LCA (ID: B7), to ensure that landscape buffers are provided and the dispersed settlement patterns and tranquillity of Lower Rainham are maintained. This is supported by the requirements of Policy SA10 which ensure that the developments align with the Rural Design Code and are supported by a green infrastructure strategy (ID: A1, Policy SA10, Part 11 - page 289).

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

1.15 RN9 has been robustly assessed in the SA (ID: A3.3, paragraph K.2.10.9 - p.617), taking account of the Heritage Asset Review (ID: B9), concluding that the developments would have negligible impacts on cultural heritage, when policies S8, S9 and DM10 are applied (ID: A1).

1.16 Furthermore, the SA conclusion is supported by the Secretary of State's decision on the dismissed appeal scheme on the Site (ref. 3259868). The Inspector and Secretary of State both concluded, that the benefits of the proposals outweighed the potential harms to the heritage assets.

1.17 The archaeological evidence supporting the application was equally scrutinised through the application and appeal process, with all parties agreeing to the imposition of planning conditions to protect potential remains. This was deemed appropriate due to the working orchard use and limited ability for detailed evaluation.

1.18 Further, Policy SA10 requires allocation RN9 to have regard to heritage assets (ID: A1) and must comply with DM policies to conserve the significance of assets.

1.19 The site has therefore been subject to more detailed analysis of heritage and archaeological interests than would otherwise be undertaken for a local plan allocation and found to be acceptable.

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

1.20 Policy SA10 requires the developments to be informed by a Rural Design Code and Green Infrastructure Strategy, having regard to the setting of adjacent conservation areas and listed buildings (ID: A1). For Site RN9, the SME consortium approach ensures parcelisation and design variety across the site, punctuated by green routes and landscaping to safeguard important views and green infrastructure, in accordance with the Landscape Character Assessment (ID: B7).

1.21 Notwithstanding the Local Plan Evidence Base, any future planning application will need to demonstrate accordance with Policy S4 (Landscape protection and enhancement) and Policy DM9 (Heritage Assets), as well as the NPPF (2026), which embed the require of development to protect and enhance the character and distinctiveness of Medway.

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

1.22 The policy requirement of SA10, in relation to Site RN9 is too precise and should be more flexible in respect of the scale of the proposed uses i.e housing numbers. To ensure that development makes most efficient use of land in accordance with Policy L1 of the NPPF (2026), the housing numbers should be revised to 'circa 800'. This reflects the scale of development tested in the LAA and SA (which was for 800 dwellings) and the flexibility in Policy SA10 will allow for the final design and scale

of development to be informed by site specific technical work without an 'up-to' ceiling, with the Council's own evidence base assessing a higher number; Transport Assessment at 800 dwellings (ID: B18.1) and Land Availability Assessment up to 800 dwelling (ID: B1 - pdf p.1726).

1.23 Further, in preparation for a planning application, Esquire Developments submitted an Environmental Assessment Screening application to the Council (MC/26/1472), screening for circa 825 dwellings. The increase in numbers has been informed by technical work and masterplanning input to date, suggesting a greater yield than the 750 dwellings identified.

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

Q13.129 How will sustainable travel choices be promoted?

1.24 Site RN9 has been modelled in the Council's Strategic Transport Assessment (Forecasting Report) (ID: B18.1, Table 9-3 - pdf p.136), which ensures that the traffic flow generated has been accounted for in the network and any necessary strategic upgrades accounted for in the Infrastructure Delivery Plan (ID: B2).

1.25 In addition to the transport Evidence Base, Esquire Developments has undertaken its own site specific modelling utilising the Jacobs model to understand additional site specific matters that would be necessary to address as part of any planning application. The preliminary results of this were set out in Esquire Developments Regulation 19 consultation (Representation ID: E.134) which set out a suite of highway and sustainable transport measures.

1.26 The proposals are required to align with Policy TR1 of the NPPF (2026) and deliver a vision-led approach to transport, prioritising sustainable transport and a wider choice of transport modes. The Policy objective seeks to improve connections for people and nature, with the provision of green routes and interconnectivity going to the heart of the allocation (ID: A1 - p.288-289). The principles underpinning the Site's vision-led approach are confirmed in the Transport and Movements Representation to the Regulation 19 (Representation ID - E.134), which informed the allocation and confirm:

- Pedestrian and Cycle Enhancements - improved connectivity within the site through green routes, with off-site improvements to existing routes including alteration to provide a footway connection under the Pump Lane railway bridge.
- Mobility Hub - electric car club parking bay, electric bike hub, bicycle lockers and repair stand, information terminal and boards for wayfinding, and secondary mobility hubs around the site.
- Bus Connectivity - an existing bus service is proposed to be extended to route into the Site from Lower Rainham Road, connecting to the Local Centre. The proposed pedestrian footway connection under the railway bridge on Pump Lane provides safe connections to additional bus stops / services on Beechings Way.
- Reduced vehicle trip generation - reduction in residential car driver mode share accounting for proposed sustainable travel measures and through the vision-led strategy.

1.27 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 National Cycle Network Route 1 and other local cycle routes, the Public Right of Way network and the surrounding pedestrian network into Rainham and Gillingham, including Rainham Railway Station.

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

1.28 Yes, the trajectory timescales identified in the Housing Delivery Topic Paper (ID: B22.5) is achievable, as confirmed in the SoCG with the Council. The infrastructure requirements provided within the Infrastructure Delivery Plan (ID: B2) will be confirmed and triggers agreed as part of the S106 agreement.

Q13.131 Are there any significant constraints relating to viability, land ownership, flood risk, contamination or infrastructure provision?

1.29 No, Site RN9 is unconstrained and in sole ownership of a single landowner.

1.30 There are no significant constraints to the delivery of the development, in relation to flood risk or contamination, which is confirmed in the previous outline application (MC/19/1566) and corroborated by the Secretary of State at appeal. The infrastructure required to mitigate the development are set out in the

Infrastructure Delivery Plan (ID: B2) and will be confirmed as part of the forthcoming planning application.

Q13.132 Is the allocation set out in Policy SA10 capable of being delivered during the Plan period and as set out in the housing trajectory?

1.31 Yes, the development will be delivered in the Plan period and the trajectory timescales identified in the Housing Delivery Topic Paper (ID: B22.5) are achievable. To meet the demand early in the Plan period, a planning application is being prepared for submission at the end of the year.