Name: Margaret Baddeley

Reference 150

Organisation Nathaniel Lichfield & Partners

On Behalf Of Bourne Leisure Ltd

Type of Consultee

Developer/Consultant





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 Date
 22 February 2016

 Our ref
 14349/IR/LH/10798691v2

 Your ref
 14349/IR/LH/10798691v2

Dear Sir/Madam

Medway Local Plan Issues and Options Consultation Document (January/February 2016): Representations on behalf of Bourne Leisure Ltd.

On behalf of our client Bourne Leisure Ltd., please find below representations on the Medway Local Plan Issues and Options Consultation Document (January/February 2016), published for consultation until 29 February 2016. Bourne Leisure previously commented on the Medway Issues and Options consultation document (July 2009) and Medway Pre-Publication Draft Core Strategy (August 2011).

We now set out comments on the Medway Local Plan Issues and Options Consultation Document in response to questions posed in relation to:

- 1 Developing a Vision for Medway in 2035
- 2 Strategic Issues
- 3 Economy
- 4 Tourism
- 5 Environment
- 6 Natural Resources
- 7 Flood Risk
- 8 Transport
- 9 Sustainability and Climate Change

By way of background to these representations, Bourne Leisure operates more than 50 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain and is therefore a significant contributor to the national tourist economy, as well as local visitor economies. Within Medway, Bourne Leisure operates the Allhallows Holiday Park.

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For Bourne Leisure to continue to attract customers and to respond to changing market conditions, the Company needs to invest regularly in order to provide new and improved facilities and accommodation.

For many of the Company's holiday parks, improvements may necessitate the expansion of sites in order to improve the quality of accommodation, decrease densities, or increase the range of facilities in order to extend the holiday season to provide more of a year-round attraction.

As many of Bourne Leisure's sites nationally are located in rural and/or coastal areas, incorporating or adjacent to environmentally and ecologically sensitive sites, the Company also has significant experience of operating within and adjacent to such locations and takes the need for protection and enhancement fully into account in day to day operations and when drawing up development proposals for sites.

Response to Consultation Questions

Developing a Vision for Medway in 2035

Q1. What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

In relation to paragraph 5.3 of the Issues and Options Consultation Document which states that the Vision for the Local Plan must realise opportunities to drive economic success, Bourne Leisure considers that the visitor economy and wider tourism sector should be fully recognised as a means of contributing to the future growth of Medway's economy. In particular and to build on statements made elsewhere in the Issues and Options consultation document (e.g. paragraph 9.1), Medway should be promoted as a year round tourism destination with a wide range of good quality accommodation, facilities and attractions.

In addition, the Vision should support the enhancement of existing tourism accommodation, again to be consistent with other statements made in the consultation document. This revised approach would also then reflect national policy as set out in the National Planning Policy Framework (NPPF) (Section 3, Paragraph 28), supporting the provision and expansion of existing tourist and visitor facilities in the context of rural economies.

Strategic Issues

Q2 What do you think are the strategic issues that the Local Plan needs to address?

Bourne Leisure notes that paragraph 9.4 of the consultation document refers to the importance of tourism in terms of income generated, number of trips and number of tourism-related jobs. Bourne Leisure therefore considers that specific recognition should be given to the importance of tourism in Medway and the opportunity to improve the range and quality of tourism accommodation.

Bourne Leisure therefore considers that the Strategic Objectives should: recognise the importance of tourism to the future prosperity of Medway; encourage development which improves the quality of the tourism experience; and encourage more staying visitors by promoting the provision of a range of good quality visitor accommodation.

Q3 How should the Council respond to these issues?



The Council should refer to the enhanced role of Medway as an important tourist destination, where improvements to the quality of tourist-related facilities and accommodation will be encouraged by local plan policy, in order to extend the tourist season, generate additional, less seasonal employment and attract additional tourism-related expenditure.

Economy

General Comments

With regard to the 'Economy' section of the Issues and Options Consultation Document (pages 27-34), Bourne Leisure considers that the growth of tourism should be recognised explicitly as a key positive feature of Medway's economy amongst the other successes listed (such as manufacturing, and higher and future education). It is important to recognise the crucial role the visitor economy plays within Medway at present and in addition, how it can contribute to growth in the future.

Long-established tourism operators such as Bourne Leisure already employ a significant number of people within the region. It is critically important that Bourne Leisure's current contribution and future scope for growth are fully recognised and built on, in relation to the approach taken to the role of tourism in the Local Plan, when identifying the key issues for the economy as a whole.

Tourism

General Comments

Bourne Leisure supports the consultation document's recognition in paragraph 9.1 that tourism plays an important role in Medway's economy and culture and the Company consider that this should be fully recognised and built on throughout the emerging Local Plan.

Q22 What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?

In addition to promoting additional visitor accommodation as a matter of principle, the emerging Local Plan should take into account the opportunity for the expansion and improvement of existing holiday parks, such as Allhallows Holiday Park, and acknowledge the invaluable role that existing tourism accommodation and facilities currently play within the Borough.

Bourne Leisure strongly considers that in-principle policy support should be provided for the upgrading and extension of existing holiday parks in order to provide additional visitor accommodation to support and contribute to the future development of the tourism section within Medway.

The Company then considers that Paragraph 9.5 of the Issues and Options consultation document, which identifies opportunities to extend the visitor accommodation offer, should also specifically acknowledge the importance of holiday parks in providing visitors with choices in terms of where they stay; recognition should be given to how high quality static holiday caravan and holiday chalet sites make a vital contribution to providing a variety of high standard tourist accommodation within Medway.

In addition, Bourne Leisure considers that recognition should be given to the ongoing requirement for operators to continuously consider upgrading and carrying out improvements to tourism facilities such as caravan parks, so as to meet visitors' expectations. The emerging Local Plan



should recognise that such improvements may require some expansion of site area, e.g. in order to provide enhanced landscaping as an integral part of an expanded Park.

Q23 What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?

The enhancement and improvement of existing visitor accommodation and facilities is required to meet visitors' requirements and to help attract increasing numbers of 'overnight', higher spending visitors to Medway. Bourne Leisure considers that a specific policy should be included in the emerging Local Plan to encourage the upgrading and extension of existing holiday parks. The creation of an improved tourism offer that builds on existing provision holds a unique opportunity to increase the length of visits within the area. An extended visitor season would provide longer term visitor interest and ensure a better quality all-year visitor economy. By helping to reduce the seasonal nature of the tourism industry within the area, Medway's tourism sector will remain competitive, profitable and sustainable.

Environment

Q30 What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?

Whilst Bourne Leisure recognises the importance and value of Medway's natural environment, the Company considers that policies for the natural environment should include reference to balance, and the consideration of the social and economic benefits potentially arising from the enhancement (and where appropriate extension) of existing tourism developments. Accordingly, future decisions should take full account of the specific characteristics of each development proposal and assess whether it makes a positive contribution to protecting or enhancing the environment, when considered on a case by case basis. It is therefore considered that the importance of balancing environmental concerns with the economic and social benefits of development should be a key approach and policy theme throughout the emerging Local Plan. In particular, the emerging Plan should support limited new developments in sensitive locations, with proportionate mitigation where required – such developments including the enhancement and expansion of holiday parks, for which a countryside/coastal location is essential.

Q32 What approach should be taken in determining the role of landscape in producing a spatial strategy for new Local Plan, and development management policies?

Emerging development management policies must recognise existing land use and development potential when determining the role of the landscape. For sites such as Allhallows Holiday Park, which is in an environmentally sensitive location, it is important that Local Plan policies do not preclude appropriate development where commensurate mitigation measures can be implemented to address both direct and indirect impacts.

Natural Resources

Q56 What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

In paragraph 18.2 it is acknowledged that much of the desired agricultural land falls close to existing settlements and is of interest for potential development; this observation is applicable to All



Hallows Holiday Park. As a consequence, Bourne Leisure wishes to reiterate the point, that not all development will negatively impact on key landscape including that of agricultural land and therefore would encourage proposals to be considered entirely on a case by case basis. Bourne Leisure considers that there should be a balance between conserving agricultural land and development being supported that presents tangible economic, social and environmental benefits.

Flood Risk

Q66 How should flood risk and SuDs be taken into account in planning for growth in Medway?

Bourne Leisure considers that it will be important for the specific characteristics and vulnerability of particular uses to be taken into account when considering the effects of flood risk. For example, certain tourism uses need to be, or to remain located adjacent to water in order to continue to attract visitors. In addition it will be important for consideration to be given to whether the residual risks of flooding to people and property are acceptable and can be satisfactorily managed and whether the proposed development would make a positive contribution to reducing or managing flood risk. In particular, the Company considers that in regard to the consolidation and expansion of existing tourism accommodation and holiday parks sites within flood risk areas, only the extent of the new development site within or adjacent to the existing holiday park - and not the whole site - should have to be assessed sequentially.

Consequently, proposals for the improvement/expansion of existing tourist accommodation and facilities should be considered on a more flexible basis to new development at such locations; such flexible considerations should include taking account of the specific characteristics of particular and current uses and the merits of each individual proposal. Emerging policies should explicitly recognise new tourism-related development can be justified in areas of flooding I such circumstances, particularly where it provides regenerative benefits and increased contributions to the sustainability of the local economy.

Transport

Q72 What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?

Whilst Bourne Leisure endorses the proposed approach to increase the use of public transport and rates of walking, the Company would however emphasise that in the case of some land uses such as tourism, there is often no feasible alternative available, other than the private car, for reaching more remote areas.

There is therefore a need for the policy and any supporting text within the emerging Local Plan to recognise in relation to tourism uses, such as holiday parks which are car dependent, that there is often no feasible alternative available other than the private car for reaching tourism uses/areas.

Bourne Leisure therefore considers that the emerging Plan should promote non-car modes of transport where applicable, but recognise the reality of car-based access, particularly in terms of tourism related development.



Sustainability and Climate Change

Q61) What should sustainable development look like for Medway? What plans and policies should we put in place to achieve this?

Bourne Leisure notes the statement in the consultation document that the economic, social and environmental strands of sustainability have the potential to outweigh harm in relation to one another (paragraph 22.2), and endorses the recognition that proposals can be considered holistically. The need to conserve the natural environment should be balanced against the need to ensure that development is not unnecessarily restricted.

Given the significance of tourism within Medway both now and in the future, it is important for the Local Plan to demonstrate support for new development; in short, plan policies should be worded such that new development proposals would be considered on their own merits. Emerging policies should support sustainable growth in principle, in the form of high quality tourism proposals that increase the quality of Medway as a visitor destination and enhance tourist accommodation, reflecting the current and future economic importance of tourism here.

Q64) How can existing development and communities mitigate and adapt to the risks posed by climate change?

Paragraph 22.1 notes 'distributing new development in a pattern that reduces the need for travel and maximises the potential of more sustainable methods of travel to reduce emissions from private transport use' as a way planning could help to mitigate climate change. As stated previously, many tourism developments, including Allhallows Holiday Park, are for the most part car dependent. Bourne Leisure therefore considers that future development potential is not inhibited due to poor public transport accessibility, as the expansion and enhancement of existing facilities can contribute to the wider economic sustainability of Medway.

Bourne Leisure supports the suggestion of sustainable development within buildings (paragraph 22.1). The Company already ensures that all new buildings and refurbishments of existing venues incorporate the use of LED lighting, efficient heating and cooling solutions, occupancy sensors. The use of heat pump technology is designed to benefit from the maximum use of natural ventilation and natural daylight. The Company's hire fleet holiday homes have been developed in recent years to include increased levels of insulation, efficient boilers to provide heating and hot water, LED lighting both internally and externally, occupancy sensors to limit energy use in periods of non-occupancy and insulative double glazing.

In regard to climate change, Bourne Leisure considers that the forthcoming Local Plan should take account of the specific characteristics of different land uses and in doing so, recognise the importance of maintaining and retaining existing tourism uses. Priority should be given to defending existing properties from flooding, particularly as it is often impractical and financially unviable to relocate existing development, such as holiday parks. Owners and operators should be provided via local plan policy to provide and maintain (physically, and/ or by funding) defences that would allow them to continue to run their businesses in situ, and expand where appropriate.

We trust these representations are clear and will be considered and reflected fully within the drafting of the Medway Local Plan. Please do not hesitate to contact either my colleague France Young or me, should you require any clarification of any of the points made. We would also be



grateful if you would keep us informed in the future of any further consultation stages on the Local Plan and any other emerging local development documents.

Yours faithfully

Margaret Baddeley Planning Director

Copy Ruth Shaw, Bourne Leisure Ltd.

Name: Emma Andrews

Reference 151

Organisation Porta Planning LLP

On Behalf Of University of Kent

Type of Consultee Developer/Consultant



29 February 2016

Planning Policy Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR 67–69 George Street London, W1U 8LT



FAO: Catherine Smith

Our reference: l-hjd-uokrep-250216

Dear Madam

MEDWAY LOCAL PLAN ISSUES & OPTIONS CONSULTATION FEBRUARY 2016 REPRESENTATION BY UNIVERSITY OF KENT

We are instructed by the University of Kent (UOK) to submit representations to the Medway Local Plan Issues & Options Consultation document. Our representations are set out below with reference to the questions put forward in the Consultation document, but first we provide some background about the Medway Campus to provide context to the representations.

University Context

UOK is a public research university founded in 1965, with Campuses in Medway, Canterbury, Tonbridge, and several locations throughout Europe.

UOK's Medway Campus was established in 2005 as part of a unique partnership between UOK, the University of Greenwich and Canterbury Christ Church University, collectively known as the 'Universities at Medway'. The partnership allows each of the institutions to offer a range of their own courses but to share important Campus and teaching facilities, providing students with a state of the art teaching and student experience.

The Campus has experienced significant growth over the first 10 years, with the total number of students at the Universities at Medway more than doubling and the total number of staff almost tripling. There has also been significant investment in purpose built facilities by the UOK since it was established, totalling millions of pounds.

This has included the £10million Drill Hall Library and upwards of £10million in the refurbishment of buildings within the Chatham Historic Dockyard. This has also included establishing the School of Music & Fine Art (Clock Tower, Central Boiler House, Engineers Workshop, Fire Station, Foundry, Galvanising Shop, Smithery and the Old Surgery), Kent Business School (Sail & Colour Loft building), a 300+ seat lecture theatre (Royal Dockyard Church), and a performance space and café (Galvanising Workshop) in the Chatham Historic Dockyard. Cargo, an award winning bar and bistro, has opened within the Liberty Quays halls of residence and the derelict Grade II listed C4 swimming pool building is also in the process of being converted into a multi-purpose Student Hub, due for completion later this year. UOK also has committed £3million to the creation of Medway Park, a regional centre of sporting excellence.

The University of Kent therefore occupies academic and residential property in the following locations:

Chatham Maritime / Pembroke

- Chatham Historic Dockyard
- Liberty Quays
- Medway Park (formerly the Black Lion Leisure Centre)
- Land at Medway Road

These locations are identified on the attached plan (ref: M3-6-000). UOK occupies 12,994sq.m of floorspace within the Chatham Maritime Buildings (of which 6,797sq.m is new build floorspace) and occupies 6,800sq.m of floorspace within the Chatham Historic Dockyard. This currently provides teaching and academic space for approximately 1,255 FTE students within the Chatham Maritime Buildings and approximately 810 FTE students within the Chatham Historic Dockyard. An additional 745 FTE students are also located within the Chatham Maritime buildings, although students on this particular course (pharmacy) are shared with the University of Greenwich.

Of the students identified above, approximately 24.3% of the undergraduate students and 12.6% of the postgraduate students are located within the ME1 to ME20 postcode areas. UOK also provides between 800-900 beds at Liberty Quays.

The Chatham Maritime Buildings are generally accessed via North Road and Central Avenue, but UOK's own entrance is via Purser Way and Johnson Avenue. It is important to UOK that this access is protected. This is also an important access for bus services to the Campus. UOK has invested in a travel plan and green travel measures that has involved significant investment in buses. The Campus also provides cycle parking near each of its buildings.

The nearby development at Chatham Waters, which is only a short walk from the Campus, will provide much needed business, retail and residential floor space to the local area. In addition, a new hotel will provide further facilities allowing the Campus to deliver language schools, seminars and conferences.

UOK's 'University Plan 2015-2020' sets out the vision and strategic objectives for the university. It sets out ambitious but quantifiable targets against which UOK and others can judge its progress. In respect of the Medway Campus, the aspiration is to increase the student population by a further 1,000 FTE students. To achieve this growth UOK wishes to work in partnership with Medway Council in order to support the growth of the University and provide the best higher education experience in the Country.

UOK Response to the Issues & Options Consultation

1. Question 1 - Developing A Vision for Medway 2035

We would like the Plan's Vision to refer to the importance of the higher education and knowledge driven economy in Medway. An economic impact study commissioned by UOK in 2014 found that UOK is worth £0.7billion to the economy of the South East and both directly and indirectly supports over 7,800 jobs within this region. In respect of the Medway Campus, the UOK generates over £80million per year and 830 FTE jobs.

In addition, students at UOK have logged a large number of volunteer hours (circa 16,000 in 2013/14) at Friston House care home and Parkwood Youth club. They also assist small businesses and community organisations with their IT needs through the Kent IT Consultancy.

UOK, and the wider Universities at Medway, are therefore key anchors that assist in driving economic growth and regeneration in the Chatham and the Historic Dockyard, Medway and the South East region and provide a valuable local service to local businesses and community groups.

Further details of the economic impact study can be found at the following link: <u>http://www.kent.ac.uk/about/impact/index.html</u>

2. Question 2 - What do you think are the strategic issues that the Local Plan needs to address?

There are 3 key strategic issues for UOK would like the Local Plan to address:

 Continued planning policy support for the expansion of further and higher education in Medway.

- Improving accessibility to further and higher education institutions. A key issue for UOK is improving access to the Campus from the wider area by both public transport and car, but also improving accessibility to each of UOK's sites in Medway.
- Ensuring safe and secure environments for students and all residents in the areas around the Medway Campus.

3. Question 3 - How should the Council respond to these issues?

In response to the issues raised to Question 2, we suggest that the Council should respond as follows:

- Continue Medway Local Plan (2003) Policy CF7 into the new Local Plan. The new policy
 would need to be updated to reflect the wider geographic location of UOKs buildings (as
 outlined above and shown on the attached plan).
- Identify in consultation with UOK public transport, cycle and pedestrian improvements that would support the objectives of the University Plan and improve the higher education experience.
- Identify public safety, environmental and public realm improvements that would support the above and benefit the wider community.

The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life. NPPF paragraph 10 requires Plans and decisions to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. We consider that the new Medway Local Plan should include policies and proposals that assist UOK in making the higher education experience at Medway one of the best in the country.

4. Question 13 – Student Housing

UOK is supportive of the need in the new Local Plan to identify student housing needs over the Plan period, which is consistent with the University Plan that anticipates up to 1,000 additional FTE students at the Campus. UOK offers all first year and overseas students the opportunity to access student accommodation and appropriate locations will need to be identified to provide for the increase in demand over the Plan's period.

Key considerations in identifying sites will be investigating UOKs own landholding, but identifying sites that have reliable and frequent public transport and offer high quality and safe environments (see also our response to question 3 above.)

5. Question 19 - How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?

The recognition given to the "learning quarter" (page 28) is welcomed. However, in addition to the economic benefits of enhancing skills, the Plan should also acknowledge the direct and indirect employment benefits. Universities at Medway employs 669 FTE staff up from 235 in 2002/2003 (baseline). This would support identifying the learning quarter as a specialism of the local economy (see paragraph 8.6 of the Consultation document).

In recognition of the importance of the higher education sector, we consider the new Local Plan should include an updated version of Medway Local Plan (2003) Policy CF7. The new policy should be updated to reflect the wider geographic location of UOKs buildings, as outlined above and shown on the attached plan, but continue the express support for the expansion of UOK.

In addition, UOKs site at Medway Road has potential for development that supports the University Plan. The site extends to 1.4 acres (0.59 ha) and is included in the Medway Strategic Land Availability Assessment under reference 0810 as being suitable for employment development. We consider that the Local Plan should allocate the site as an 'opportunity site' for development that supports the

University Plan. At this time there are no particular development plans and the site could be developed for a range of academic, residential or mixed-use activities.

There is a need within Medway for the provision of the late night bus services to be expanded and for it to allow safe and easy access to facilities and amenities. UOK would like to work with key partners, including Medway Council, to ensure that changes to services would serve the University as well as other residents and businesses.

The presence of the "learning quarter" presents an opportunity to increase the retail, social and cultural offer of Medway and to enhance the higher education experience. We consider that there is an opportunity to identify and promote opportunities for activities and events that will enhance the higher education experience and also benefit the local economy.

6. Question 71 - What infrastructure is required to support Medway's growth over the plan period?

In our response to questions 2 and 3 of the Consultation document we identify the importance of the environment to the higher education experience. The new Local Plan should identify opportunities for improving connectivity in the area for students by improving the quality of bus, cycle and walking routes as well as the safety of streets and transport routes, such as the:

- Creation of a cycleway across Medway from Strood to Chatham Maritime
- Direct bus links between UOKs Campus and train stations, Chatham Waterfront and to Strood

We also refer you to our comments made under question 3.

7. Question 73 - What provisions should be made for car parking?

The availability of adequate car parking is important to the continued success of the Medway Campus. However, we consider that flexibility should be applied to the application of parking and cycle standards so they reflect local circumstances. UOK currently has limited parking and wishes to ensure its existing level of parking is retained and increased in line with University related growth. Flexibility in the application of Medway Council's parking standards would assist with this and would be consistent with NPPF paragraph 39, which states that if setting standards local authorities should take into account the following:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- an overall need to reduce the use of high-emission vehicles.

UOKs operates a Campus travel plan and employs a team of staff to manage the promotion of sustainable travel and green travel measures. This includes measures such as:

- A partnership with Arriva which means that the 116 bus service runs through the Campus
- Operates a parking exclusion zone and does not allow any car parking at Liberty Quays
- Hosting 'Dr Bike' events for students who cycle to the Campus
- Provision of a Campus Shuttle
- Promoting the travel plan and reducing the need for students in Medway and Maidstone to use vehicles

Conclusion

UOK welcomes the recognition that is given in the Consultation document to the University and the "learning quarter" in general. We would welcome the opportunity to meet with Officers to elaborate on the points raised above and to consider how the new Local Plan could respond. We will contact you to establish if this would be possible.

Please can you confirm receipt of this representation. We reserve the right to supplement this letter of representation at a later date.

Yours faithfully



Encl: University Buildings at Medway, Drawing Ref: M3-6-000





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N.T.S. @ (A3) criters attendee stand	Drawn- L.E.
DRAWING NO	M3-6-000
DRAWING NO	M3-0-000

Name: Marion Shoard

Reference 152

Organisation

On Behalf Of

Type of Consultee Member of the public My name is Marion Shoard and I live in Strood. Here are my comments on Medway Council's Local Plan Issues and Options Consultation Document.

The location of future development

The council is seeking sites for a considerable amount of new development, including nearly 30,000 houses. In assessing the options, I urge it to consider the implications of further building for the environment of Strood.

Three major roads – the A2, A228 and the A226 – converge in the centre of Strood. It is already heavily congested with traffic and it is a dangerous place in which to cycle and, in many places, to cross the road. The council acknowledges that 'Strood suffers from poor environment, exacerbated by levels of through traffic' (para 111). Last week the Royal College of Physicians and the Royal College of Paediatrics and Child Health drew attention to the fact that outdoor air pollution most of it from vehicular traffic causes 40,000 premature deaths in the UK.

The council should publish air quality information for the whole of Medway as part of its consultation document, together with predictions for future concentrations of air pollutants if development is permitted in the areas it is seriously considering for future growth.

Two possible proposals for future development, whether involving urban extensions or new free-standing settlements are located in the Hoo Peninsula; a third constitutes the expansion of the northern outer edge of Strood. If development is allowed in either of these areas, traffic volumes in Strood town centre and thus the quality of air and of the whole environment there will get even worse. Medway Council recently invested a large amount of council tax money in the development of Strood Community Hub in the town centre. But how can Strood become a more attractive town centre without a major mitigation of the impact of traffic?

The implication of the discussions on employment land (paras 8.12 - 8.15 and 27.16) seems to be that the council may favour the relocation of industry and offices from City Estates to Kingsnorth, followed by the development of new housing on the land at present occupied by City Estates. Were this to take place, the implications of traffic generation and the impact on health of the poor quality of the air in Strood would be extremely serious. At the same time, people who live in Medway would face much longer journeys to work and to visit businesses currently located on City Estates.

If the council considers that City Estates is inadequate in some way, I urge it to come up with proposals to address any problems rather than the wholesale relocation of the City Estates businesses.

So wide-ranging and serious are the transport and air quality implications of major new building on the Hoo Peninsula that the council should contemplate it only if it is prepared to fund a new fixed mass transit link between Medway, Hoo and Kingsnorth along which trains or trams would run frequently and on which fares would be low. It should also stipulate that any new housing development comes with no provision for residents' car parking except for disabled people and those working in occupations which require the use of a car, such as people working for emergency medical services.

No further development should be allowed on the peninsula or on the northern fringe of Strood until the amount of traffic through Strood has been reduced and the environment there radically improved, both for pedestrians and cyclists.

Transport

I urge Medway Council to make a commitment in its local plan to enhance the lives of older and disabled people in Medway through the introduction of a system of travel or taxi vouchers of the kind offered by many other councils. These are given to people who are eligible for a free bus pass but are unable to use buses because of disability. The vouchers can be used to contribute towards taxi fares.

Many residents in Medway are unable to use buses and so cannot make use of the concessionary bus passes to which they have a right. These residents include people living in retirement and sheltered housing and care homes in the area.

Environment

In para 11.4 the council lists the special landscapes of Medway but omits the one that is perhaps most characteristic of this area – disused chalk workings. Whether these take the form of derelict quarries or chalk cliffs (most obviously the cliff that rises above Strood and is crowned by All Saints Church, Frindsbury), these workings bring dramatic contrast to the Medway landscape and play host to some of the few areas of wild vegetation within the urban area. They support diverse wildlife, but they also have considerable historical interest, as much of the prosperity of Medway and the Lower Medway Valley arises from cement manufacture from chalk.

In the past many of these quarries both large and small have disappeared to housing and industrial development and waste infilling. There are now far fewer disused quarries remaining and what was a common resource is now scarce. Disused chalk workings should be acknowledged as a key feature of the Medway landscape and furthermore given priority for conservation and informal recreation provision in the future. The council should include a commitment in its local plan to this effect.

Informal outdoor recreation provision

The council says that it is working to a standard of provision of 3.25 hectares per 1,000 people. This is too low. The figure in Gravesham is more than three times this amount and that in Swale more than twice. Why should the citizens of Medway have to put up with so much less?

Much of the open space in Medway is situated on its outer fringes and consists of relatively large blocks of land, such as Ranscombe Farm. These areas form an invaluable lung for Medway's residents. However, there are serious gaps in provision. There are also untapped opportunities for further provision.

The major gaps in provision throughout Medway but in particular in Strood (North and South wards) lie in small areas close to where people live. Much of the housing in this area is tightly packed and there is little public open space for informal recreation. This means that if, for instance, you live in the network of streets that stretches north from Strood station up across Gun Lane and through the area centred on Bryant Road, you have to walk up to Broom Hill to reach your nearest public open space. This involves considerable effort for many people, not least older citizens. Many of the people living in this area do not have access to a car. Everyone – young and old – should enjoy a right to the provision of public open space close to their home.

I urge the council to include a policy in the local plan to the effect that if land should become available in those localities of Medway which are poor in open-space provision that the first priority for that land should be informal open-air recreation provision.

Pocket parks should include small areas on street corners and in all of them I urge the council to make ample provision for seating, not just to enhance social contact but also to act as resting places for people who cannot walk far. The council rightly observes that Medway will play host to many older people in the future and that 'An ageing population may be more dependent on facilities that are easily accessible within walking distance' (para 15.5).

In tandem with the development of pocket parks, I urge the council to include a commitment in its local plan to develop the opportunities for informal open-air recreation and wildlife conservation and enhancement along Strood riverside, from Rochester Bridge past Strood station at least as far as City Estates. Much of this land has lain undeveloped and unused for many years and performs no useful function for the people of Medway. Yet it is ideally situated for informal walking, cycling, birdwatching and so on, affording as it does views over the river and up to the landmark of All Saints church. Maritime vegetation naturally grows here but it is often destroyed, for instance, through spraying road verges or the appearance of the land is impaired by litter, for example, in Kingswear Gardens. Natural vegetation should be encouraged in this area and the special characteristics of its ecology celebrated with interpretation boards. The council has already invested here through the provision of sports courts, a paved promenade and signposts for the Saxon Shore Way. This focus on recreation should be extended and the rather formal planting near the sports courts complemented by the encouragement of wild vegetation.

Gravesham Council has provided for informal recreation for the people of Gravesend through the development of the Riverside Leisure Area. This takes in grassy areas and traditional parkland, a lake, provision for sailing clubs and a long promenade including a café. I urge Medway Council also to provide a focus of recreation for the people of Strood along the riverside by adding to the provision they have already made in particular with areas of managed semi-natural vegetation. Such measures would also greatly enhance the experience of people using Strood station, where Network Rail is planning further improvements for passengers.

Public footpaths

It is good to see that Medway Council wishes to promote 'a healthier Medway making it easier for people to walk, cycle and exercise locally' (para 14.2). Walking in particular is popular in Medway, with several voluntary groups holding programmes of walks throughout the year while the council itself supports a programme of walks for health. However, I am concerned that the council proposes to focus exclusively on the development of further public footpath provision along the coast and has ignored the need for provision inland throughout Medway. This focus would duplicate the steps that Natural England is already taking to establish a right of public access around the coast of Medway. More seriously, it ignores the real need for greater public path provision.

The density of public rights of way throughout Medway is low. Such public paths as exist are an accident of history and do not reflect the needs of Medway's large population. The density is low not only in rural areas such as the Hoo Peninsula but also around the fringes of the built-up area. For example, there is a dearth of public rights of way across the countryside to Upnor and also up towards Great Chattenden Wood from Frindsbury and Wainscott. There are hardly any public bridleways in Medway. Many of our rights of way are unsuitable for people with mobility difficulties. I urge the council to include a commitment to extend radically the network of public footpaths and bridleways throughout Medway and to improve the accessibility of all rights of way for people with mobility problems.

Marion Shoard 29 2 2016

Name: Kirsten Williamson

Reference 153

Organisation

Southern Water

On Behalf Of

Type of Consultee

Government/Public Body

maryott, kyle

From:	Policy, Planning
Sent:	29 February 2016 14:58
To:	policy, planning
Subject:	RE: Medway Local Plan Reg 18
Attachments:	GuidingPrinciplesLocalPlansCurrent_Southern Water.doc
Follow Up Flag:	Follow up
Flag Status:	Completed

Dear Planning Policy Team

Thank you for consulting Southern Water on your Issues and Options document for the Medway Local Plan. Once you have reached the stage of allocating sites within a draft document, we will be able to undertake an assessment of the potential impact on our infrastructure. At this time, I have attached our 'Guiding Principles for Local Plans' which set out in broad terms the issues we review and comment on when responding to Local Plan consultations and indicates where we would request policy provision to support us in providing infrastructure to support new development.

I have reviewed the document and offer the additional information in relation to the following questions:

- **Question 14,** we would not wish to comment on the requirement for Gypsy and Traveller sites other than to request that any site option put forward is capable of being serviced in terms of water and waste water.
- Question 60, Waste Management, should also refer to waste water treatment and any policy section on waste should include a policy on the provision of waste water treatment.
- Question 65, relating to the optional water efficiency standard, should note that Southern Water's water supply area is classified as an area of 'serious' water stress by the Environment Agency. Southern Water has no specific comment to make, other than support for the higher optional technical standard set out in the new building regulations, but would direct you to any further information and supporting evidence that the Environment Agency may be able to provide.
- Question 78 relating to infrastructure and deliverability For your information, Southern Water has a statutory duty to serve new development and plans for this in parallel with housing allocations in the Local Plan which are taken account of in our business plan, as approved by Ofwat. Further information in this regard is included in the document attached to this email. We look to the Local Plan to support our approach by putting in place policies that support both the provision of infrastructure and the provision of that infrastructure in an appropriate timeframe.

We would wish to be kept involved and informed as your Local Plan progresses. Please let me know if you have any queries in relation to our response.

Kind regards

Kirsten

Kirsten Williamson Planning Coordinator

www.southernwater.co.uk

-----Original Message-----From: Solbra, Susan

Name: Jason Hobbs

Reference 154

Organisation

Homes & Communities Agency

On Behalf Of

Type of Consultee

Government/Public Body

X
Homes &
Communities
Agency

Planning Policy Housing and Regeneration Regeneration, Community and Culture Gun Wharf Dock Road Chatham Kent ME4 4TR

29th February 2016

Dear Sir / Madam,

Re: Representations to Regulation 18 Consultation – Medway Council Local Plan Issues and Options Consultation

In its role as a statutory consultee to planning policy consultations, the HCA welcomes the opportunity to provide comments to the aforementioned consultation document within this first formal stage of the local plan process.

Generally, the HCA are supportive of the approaches put forward within this early version and the Agency acknowledges that this early stage document does not specifically identify development locations and the ranges of uses potentially appropriate and therefore, these representations are provided at a strategic contextual level.

We also acknowledge the identification of the Agency as a Duty to Cooperate (DtC) body and accordingly, I am picking up these matters separately with your policy colleagues.

In accordance with the guidelines set out in the Consultation Document, these representations are structured in response to the specific questions posed within each chapter. The Agency would also like to reiterate its support for the Thames Gateway, within which the Agency recognises that Medway contributes greatly to. The HCA recognises the Thames Gateway as a key economic driver both in the East/South East Operating Area and nationally; a number of the Agency's most strategic projects are located within the Thames Gateway at Chatham Maritime, Queenborough & Rushenden and Rochester Riverside.

Additionally, the HCA endeavours to support development within the Thames Gateway through providing opportunities for investment and funding streams – Affordable Housing Programme, Get Britain Building (GBB) and the Builders Finance Fund (BFF).

Homes and Communities Agency The Observatory Chatham Maritime Kent ME4 4NT

homesandcommunities.co.uk

Representations to Questions

Strategic Issues

Question 2	The Agency identifies Housing supply to meet projected increases to Medway's population and domestic and international migration as a key area for the Council to address to meet growth aspirations. The potential introduction of Starter Homes alongside other existing housing initiatives will assist in promoting housing delivery across the authority area.
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Housing

Question 4	The Agency agrees with the approach and conclusions of the Assessment of Housing Need calculated for Medway over the plan period. To assist the Council's objective in meeting the objectively assessed need, the HCA hold landholdings in the Medway authority area that could well contribute to meeting Medway's housing need of circa 29,463 new homes by 2035. Attached at Appendix A are representations in pursuance to land at Chatham Maritime that may help in this regard.
Question 5	The Agency opines that the housing market cannot be defined by catering for one specific housing market area. The Agency is keen to encourage a range of housing options for a number of end users in line with market demand.
Question 6	Although there is a clear shift in government focus towards the promotion of affordable home ownership products to enable an increasing number of individuals into home ownership, the Agency acknowledges that a variety of affordable housing products will still require provision.
Question 10	Whilst the Agency acknowledges that the criteria for Starter Homes is still to be fully determined, as an enabling body, the Agency encourages the early identification of sites eligible to deliver Starter Homes.

Economy

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Question 15	The Agency strongly supports the sustainability of sub-areas with Medway to maintain and grow in relation to both the Housing and Economic sectors. Certainly, where applicable sites can benefit from delivering land efficiencies through
	providing a mix of use, such sites will assist in maximising opportunities to contribute to Medway's sustainable growth. The

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HCA are promoting sustainable mixed-use development on a
number of their own sites as a contribution to Medway's wider
local plan objectives.

Deliverability

Question 79	The Agency has been supportive of introduction of changes to the planning system that been implemented as a way of accelerating the delivery of residential development and is further encouraged by proposed further initiatives (Starter Homes, Permission in Principle) that may assist in streamlining the planning process.
	The Agency sees the potential Starter Homes and Direct Commissioning approaches as positive steps to increasing the delivery of residential development across Medway, including land that in viability terms is challenging.

Development Strategy

To reiterate, the HCA maintains its support to the general approach being taken within this early stage contextual Local Plan document and looks forward to working productively with Medway Council as this document progresses through future public consultation stages.

Should you have any queries regarding this response, please contact me on the details below.

Yours sincerely

Jason Hobbs Area Manager

Appendix A – Interface Lane, Chatham Maritime Representations

Appendix A - Interface Lane, Chatham Maritime Representations

As part of our overall response to the Medway Local Plan Regulation 18 Consultation, The Homes & Communities Agency (HCA) would like to inform Medway Council of their intention to progress development on the 2 key remaining sites within Chatham Maritime, known as the 'Interface Land'. Development is likely to be achievable in the short term and, as such, the HCA view the sites as an important element of Medway's housing supply within the next 5 years.

The sites shown below, are referenced as the 'western site' and the 'eastern site' and at 2.7ha each amount to a developable area of 5.4ha in total. Early capacity analysis has determined that approximately 400 units may be feasible on the western site and approximately 200 units on the eastern site subject to further testing. Early stakeholder discussions and a series of technical work is underway to establish constraints and opportunities and progress early design options. It is envisaged that development will be residential-led but is also likely to incorporate an element of commercial use, particularly on the western site. Subject to demand, the sites could also accommodate an element of student housing.

Previously functioning as part of the Chatham Historic Dockyard, the sites are now brownfield development opportunities located within the regeneration area known as Chatham Maritime. Development would therefore seek to maximise brownfield land and would be in compliance with Chatham Maritime Policy S8 in the adopted Local Plan. The HCA will ensure development adheres to a number of policy documents which relate to the site. Subject to discussions with Medway planning policy team, there may be an opportunity for the HCA to work with the Council to update the existing policy guidance.

Whilst at an early stage in the process, the HCA is committed to progressing the sites in the short term. Early analysis has determined that, subject to a sensible design approach which deals effectively with site constraints, the sites are developable, viable and deliverable.

The HCA requests that Medway Council factor this exciting regeneration opportunity into their 5 year housing land supply. We look forward to working with Medway Council and other stakeholders to bring the sites forward for development in the near future.



Interface Land Site - Site Plan and Satellite View



Name: Emma Walker

Reference 155

Organisation Phase 2 Planning

On Behalf Of Ac Gotham and Sons

Type of Consultee

Developer/Consultant

Representations to the Medway Local Plan

Issues and Options 2012-2035

Prepared by Phase 2 Planning and Development on behalf of Mr Vidgeon

Site: Land to the East of Whitehouse Farm, Hoo St Werbergh (SLAA ref: 1044)

This document sets out our representations to the Medway Local Plan in relation to the above site. We have structured our response to firstly provide a justification in relation to the inclusion of our client's site within future stages of the plan and secondly to respond to the questions posed within the consultation document.

1. Land to the East of Whitehouse Farm, Hoo St Werbergh

The site, owned by Mr Vidgeon is identified in the SLAA as land to the east of Whitehouse Farm, Hoo St Werburgh (ref: 1044). It is located on the south-eastern edge of Hoo, with the settlement boundary adjoining the site to the south west. The site adjoins land which is also being promoted for development to the rear of Whitehouse Farm which is currently occupied by static caravans, with the Street Farm proposed redevelopment site to the west of the caravans.

This site is suitable, available and deliverable for housing. The nearby site at Street Farm is the subject of a current planning application for up to 50 dwellings (LPA ref: MC/15/0098) and has received officer recommendation for approval in the report to the December 2015 Planning Committee.

There is therefore clear acceptance from the Council that the development of land on the eastern side of Hoo is acceptable in principle.

In spite of this, the SLAA identifies that the sites at Street Farm and Whitehouse Farm are unsuitable for housing unless identified constraints can be addressed. In relation to this site, the identified constraints within the SLAA are:

- 1. That the site is considered to have "poor access to services and facilities";
- 2. That the site is considered to have "poor access to public transport opportunities";
- 3. The site is situated on best and most versatile agricultural land.

This is not considered to be the case as the village itself benefits from a primary and secondary school and a village centre within walking distance from the site which contains a number of facilities including a small supermarket, a newsagents, a pharmacy, a bank and a public house. The village also has two GP surgeries, both accepting new patients, and a dental practice.

There is a continuous footway on the southern side of Stoke Road leading to the centre of Hoo and further west to the local schools. Eastwards there are footways on both sides of the road.

In addition to good pedestrian/cycle access to the local facilities within the village, the site also benefits from good public transport connections, with a regular bus service (no 191) with a

frequency of 3 buses per hour in each direction during weekdays and operating every day of the week. This provides access to the larger settlements of Gillingham, Chatham, Rochester and Strood.

In light of the above, it is considered that the above site has good access to services and facilities and should be re-classified accordingly in the SLAA and formally identified as a residential site, with the consequential amendment to the settlement boundary.

This site can make a positive contribution to Hoo St Werburgh providing dwellings on previously developed land adjoining the settlement boundary and a redevelopment site. It can also make a positive contribution towards meeting the Council's housing requirements.

It is noted that a considerably larger site of 75.9ha is identified in the SLAA immediately to the north of our clients site (Land West of Ropers Lane, Hoo ref 1084). This site is identified in the SLAA as relatively unconstrained but states that "given that the site has an estimated capacity in excess of 500 units, development has the potential to deliver an enhancement in the level of services and facilities locally, either through direct on-site provision or through contributions towards local off-site facilities". In the event that such a large scale development were to proceed in this location it would result in an enhanced provision of services and facilities for all residents of any future development at our client's site at Street Farm.

With regard to the status of this site as best and most versatile agricultural land, this classification is not of sufficient weight to prevent development of the representation site. Paragraph 112 of the NPPF only requires local planning authorities to take into account the benefits of land with this designation, it does not require its protection. It identifies that "where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to sue areas of poorer quality land in preference to that of a higher quality". The development of this site would not constitute "significant development" in this context and given the quantum of housing required to meet objectively assessed needs, development of such sites in appropriate locations will be inevitable.

It is therefore concluded that this site can make a positive contribution towards housing supply in an appropriate location.

2. <u>Responses to the Questions raised in the Consultation Document</u>

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

In terms of housing the Council has a duty to ensure that objectively assessed housing needs are met with appropriate allocation of development sites and this needs to be a fundamental objective of the plan. It is imperative that the Council can identify sufficient sites for the five year period and also specific sites or broad locations for years 6-10 and where possible for years 11-15, in accordance with paragraph 47 of the NPPF. The Council has failed to meet its housing requirements in recent years, which, as identified in the latest Annual Monitoring Report 2015 (AMR) results in a shortfall of 1,564 dwellings. Given the requirement identified in the North Kent Strategic Housing and Economic Needs Assessment 2015 (SHENA), the annual requirement is likely to increase above 1,000 dwellings

per annum. As stated in the consultation document, the SHENA identifies a requirement for 29,493 dwellings during the Plan period, which equates to 1,282 dwellings per annum. Even with some highly ambitious annual completions of up 1,581 dwellings per annum predicted in the AMR, the Council fails to identify a five year supply of dwellings, even based upon the figure of 1,000 dwellings as set out in the latest AMR. In reality, the shortfall in terms of housing supply is likely to be greater, when the SHENA requirements are taken into account, along with the historic shortfall and the 20% buffer which should be applied for historic under-delivery.

Whilst it is noted that the proposals at Lodge Hill may come forward, there is uncertainty as to whether this site will be delivered and the Council has therefore rightly excluded it from its housing land supply calculations. An application proposing 5,000 dwellings on this site will be the subject of a Public Inquiry in June 2016 and as recognised by the Council, there is uncertainty as to whether this site will come forward. Even if the site comes forward, it is anticipated that it will make a limited contribution towards five year housing land supply as the outcome of the Public Inquiry is not anticipated until later in 2016 and it can therefore be assumed that first on site completions would be likely to be towards the end of the five year period.

The Local Plan must make sufficient allocations to ensure that Objectively Assessed Housing Needs can be accommodated both within the five year period and also within the Plan period and due to the uncertainty regarding the Lodge Hill site, this should be excluded from those calculations.

2) What do you think are the strategic issues that the Local Plan needs to address?

As set out in response to question 1 above, the delivery of housing is a key issue which needs to be addressed through the Local Plan via the allocation of sufficient suitable sites.

3) How should the council respond to these issues?

As set out in response to questions 1 and 2 above, the Local Plan will need to allocate suitable sites for development. The site at Street Farm is considered to be suitable for development for the reasons set out in section 1 of these representations.

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

Housing need should be based on the findings in the North Kent Strategic Housing and Economic Needs Assessment (SHENA) which was published in 2015 and is therefore the most up to date and appropriate basis for assessment, in accordance with the NPPG (030 Reference ID: 3-030-20140306 under the heading What is the starting point for the five-year housing supply?)

6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

25% is considered to be an appropriate level of affordable housing requirement, however viability of an individual scheme may result in the need to reduce the level provided.

80) Are the development principles right? Should other guiding principles be introduced?

The development principles are considered to be useful guiding principles for development.

81) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?

The consultation document sets out a number of suggested patterns of residential development and our comments on each of these are set out below:

<u>High-density town centre and riverside development</u> – the benefits of this type of development are acknowledged and supported. However as identified in the document, the land that is available for this type of living is only sufficient to meet a fraction of Medway's housing needs and the type of accommodation provided does not provide the space that many families desire and need (para 27.13). Caution should be given to extending this type of development to sites such as Medway City Estate as this would require large scale land assembly and the relocation of existing businesses. Complex redevelopment proposals such as this should not be included in the Council's housing land supply calculations due to considerable uncertainty over delivery.

<u>Incremental suburban development</u> – development of this nature is typically deliverable and does not typically face constraints such as relocation of existing uses, contamination or viability issues that so often face developers of previously developed sites within urban areas. Furthermore, as recognised by the consultation document, such developments can be attractive in themselves, provide large housing that Medway needs and enable the most sensitive countryside features to be retained (paras 27.19). Such development can also be a good way of meeting local housing needs, as it can provide a more dispersed form of development.

<u>Significant planned growth of existing settlements</u> – the consultation document identifies that this pattern of development would be most appropriate for Hoo St Werburgh, turning it from a village to more of a "market town". Whilst this approach to Hoo St Werburgh is supported in principle, it is considered that land on the eastern edge of the village could be brought forward as a smaller extension. This smaller scale approach would have a lesser impact on the character of Hoo and could be delivered in a shorter timeframe.

<u>Freestanding settlements</u> – whilst freestanding settlements can contribute to housing supply, they can also be faced with problems. They often lack facilities and services particularly in the early years, and although they may be able to benefit from facilities and services in nearby settlements or, in time, have facilities and services of their own, they can lack a sense of community and have a high turnover of people. It is also important to recognise that new settlements take a long time to plan and deliver.

<u>Urban extensions</u> – these can allow the provision of good community facilities, whilst benefiting from existing services and facilities. As recognised by the consultation document there is scope for such an extension between Rainham and Lower Rainham Road. Again, it should be recognised that such large scale proposals are typically slower to deliver, making a limited contribution towards five year supply.

<u>Custom and self build</u> – there is no objection to this development type in principle, however it is vital to recognise that this approach can only meet a fraction of Medway's housing needs.

82) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?

As recognised in the consultation document, the scale of housing requirements justifies a combined approach. It is considered that a custom and self build cannot form a key component of the strategy due to scale and new freestanding settlements present numerous challenges and are likely to be slow to deliver, both in terms of housing delivery and also services and facilities. Town centre/riverside redevelopment combined with extensions to existing developments represents the optimum development strategy. Although redevelopment can provide an important contribution to housing supply, dwellings provided by extensions to existing settlements will need to make a significant contribution and multiple locations will be required. Land to the east of Hoo St Werburgh can make a positive contribution to housing land supply, whether in the form of a smaller scale addition or a larger expansion.

83) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?

More radical approaches to meeting development needs should be treated with extreme caution as they often have significant detrimental impacts and can create undesirable living environments. High density developments are appropriate in urban locations with particularly good access to the public transport network and services and facilities as occupiers are less reliant on travel by car. In less accessible locations, there is a greater reliance on car trips and therefore greater car ownership. High density developments in less accessible locations would typically result in apartment blocks with high levels of car parking, creating a form of development out of context with its surroundings which also lacks the sustainability credentials of a more accessible location.

Large scale redevelopment of existing employment areas for residential or mixed use will result in the loss of employment land. The consultation document identifies that it is questionable whether the nature of the employment land supply will be able to cater for all future requirements (paragraph 8.20) and therefore it is likely that if existing employment land is redeveloped for residential or mixed use development, it would need to be reprovided elsewhere. It should also be noted that development of this type often faces constraints to delivery, such as land assembly and relocation of businesses and therefore is unlikely to make a positive contribution to five year housing land supply.

84) Should the green belt boundary be reviewed?

Much of the District falls outside the Metropolitan Green Belt and therefore it may be possible to meet housing requirements on this land and without, therefore, necessitating a review of the Green Belt.

Name: Bryan Fowler

Reference 156

Organisation

On Behalf Of

Type of Consultee Member of the public
Medway Local Plan 2016 – 2035

Thank you for inviting comments in respect of this document. I have lived in the Medway towns since I was born in 1954 and have seen many changes. These include living in a house in Strood without electricity until I was 7 years old, having a father who served in the Army in the Second World War and witnessing the arrival of computers to the workplace and where I live.

Question 1

I agree with the key issues and opportunities mentioned at item 5.3 but would add

• recognising the impact of climate change including air quality and proactively managing it to create a healthy environment which people and businesses enjoy living in.

Question 2

I believe the strategic issues that the local plan needs to address are:

- Developing a road infrastructure which mitigates pollution, encourages as much cycling as possible, and connects the main geographical areas of the Medway Towns. It should also mean that there are good connections with London, Dover, airports and the motorway networks
- Developing a parking regime which meets the needs of local residents and businesses
- Building on the history of the Medway towns to foster a sense of belonging, understanding and to encourage tourism
- Developing high-quality housing which primarily meets the needs of local people as well as providing an offer to all socio-economic groups

Question 3

The council should respond to all these issues through specific strategic and operational focus groups led by local councillors, attended by key council officers and representatives from the local universities. Councillors should nominate a small group of their constituents to attend these groups.

Question 6

I agree with an appropriate level being set for the requirement for social housing but believe it should be at least 25%; local government should encourage central government to reward those developers who exceed this amount.

Question 7

A form of housing which best meets the needs of Medway's growing population of older people will be situated near the centre of towns or be connected to them by rail and/or bus links. Housing should be on one level but may be accessible above ground level by more than one lift/escalator.

Question 8

The issue of student housing needs to be addressed and quantified. It should be recognised that privately rented housing for students takes that accommodation away from local people. Halls of Residence should ideally be clustered in areas close to the place of study and preferably away from the river or waterfronts. Landlords who rent their houses out to students should be specifically licensed for this rental group. Buildings such as Mountbatten House in Chatham and at Chatham Waterside, should be considered as potential student housing.

Question 19

The higher and further education establishments in Medway should be encouraged to participate more actively and visibly in the life of the Medway Towns. There is considerable intellectual and practical capacity in these institutions which are not always visible in Medway Towns life. A premium, which could be in the form of access to housing, should be considered for students/graduates who agree to commit themselves to living in the Medway Towns for a minimum number of years.

Question 22

The Medway towns needs higher quality accommodation for tourism especially in Rochester. It is suggested that serviced apartments (popular in some large cities) could be integrated into higher education Halls of Residence and brought into use especially during vacation periods.

Question 23

There may be considerable opportunities for extending tourism in the following areas:

- the importance of Black History in the Medway Towns and its relevance to the UK and wider
- the importance of Medway's industrial history to include: connected to the River Medway, aviation history, military history.

Question 24

The river and Medway's countryside are excellent assets which could be exploited further including by specific development of connected cycle trails. The Medway Towns have provided excellent backdrops to cycling events and this could be developed further for non-sporting events. Riversides should be developed as much as possible including cycle/jogging/walking pathways which, as far as possible, encircle the whole of the Medway towns including the Peninsula.

Question 25

Chatham should be purposefully and enthusiastically developed as an investment and retail centre. There is considerable spare land in Chatham or nearby. This includes the site of St Bart's hospital, the BT complex in Best Street, the Best Street mail sorting office, Chatham Riverside near Medway Street.

Question 26

It follows that land in Chatham town centre should be developed to achieve critical mass especially in terms of the retail offer as well as housing offer. The shopping offer could be consolidated as opposed to spread along the High Street which is, in effect, from Star Hill Rochester to Luton Arches. The shopping area could be developed in the area bordered by:

New Road Chatham/High Street/Batchelor Street and Military Road. It should be accompanied by attractive steel framed multi-storey car parks.

Question 29

There should be no further out-of-town shopping areas and the Dockside Outlet centre alongside Chatham dockyard should gradually become integrated into the local universities and/or housing.

Question 30

The Medway Towns should vigorously and rigorously pursue a policy of clean air. This should not be seen to be a punitive measure in any way but a positive benefit which will encourage businesses and people to inhabit the Medway Towns.

Question 31

Whatever measures are necessary to protect the natural habitats of the Medway and Thames Estuaries, should be adopted. They are a significant natural asset including for sailing and especially for birdlife. The Great Lines should be rigorously protected and not developed for housing or parking.

Question 32

The role of the landscape in determining a spatial strategy is vital but consideration should be given to tunnelling in certain areas especially to improve the road infrastructure and to cross the River Medway.

Question 33

The Medway Towns has a unique heritage which needs to be developed further. Significant harm has already been done to Medway's Heritage through wrong location of new developments such as Medway Quays, the Chatham Eye and housing near Fort Amherst. A special heritage team could be set up to oversee and develop guidance along the lines suggested in question 3 and question 23.

Question 36

There are some areas of Medway which have weaker character and most often this may be attributed to poor quality housing. While it is accepted that there are well-maintained and good quality homes in areas such as the A2 in Gillingham (east of Chatham Hill) and Luton High Street, there should be a targeted, focused housing improvement scheme. This could include demolishing these houses and providing a more uniform housing offer which will be easier to maintain.

Question 44

As much encouragement as possible should be given to people to grow their own food including advice about using their own gardens/land to do this.

Question 45

The local plan should encourage health professionals and education providers to make maximum use of the physical environment of the Medway Towns. Doctors' surgeries, for example, should encourage patients to visit and exercise in green spaces such as parks, The Great Lines and river sides. They should also encourage every person in the Medway towns to adopt a personal health plan with a view to increasing their healthiness, possibly following the lines of countries such as Finland.

Question 46

The Medway Towns is growing rapidly and needs a 2nd hospital or else, health care services need to be delivered differently. It may be that there should be a series of local injury clinics or more healthy living centres which serve a prescribed area.

Question 47

Medway's schools need to be located in places which minimise travelling through town centres. It could be that primary and secondary schools are located much closer together, if not in the same building. This could include larger, well-equipped libraries which could be accessible by members of the public as well.

Question 48

There needs to be more community facilities available to people such as the community hall on St Mary's Island in Chatham. They could be accessible if sited in local schools.

Question 57

Air quality management should be of the highest priority and real-time information should be published on the council's website including by clearly identifying the areas which it affects. Consideration should be given to banning traffic from certain roads or else charging it, when pollution levels are reached. A low emission zone for vehicles should be actively pursued and commercial traffic as far as possible only be able to use specified roads.

Question 69

Alternative supplies of energy development should be encouraged and specific areas should be encouraged to go "off grid". Wind and solar power should be actively developed.

Question 71

The vexed question of the Bus Station needs to be addressed. It has not been widely accepted that this is a good building. It has no waiting room, no refreshment or proper toilet facilities. It is not a coach station which Chatham badly needs (or a coach stopping point). In the interim, the Brook facing facility at the old bus station could be used as a coach dropping-off point or even as a bus stopping point.

Question 73

There should be a council wide review of parking charges. This should include ensuring there are more tightly drawn zones such as in town centres near stations and around Medway Hospital. It should not remain the case that anyone living within a parking zone is able to buy a resident's parking permit. Thus, a person who lives in rented accommodation and has a parking bay provided for that accommodation, should not be able to purchase a parking permit to use a nearby street. A review of parking charges should include the premise that charging for parking is a viable and acceptable way of raising revenue for the local authority.

Question 79

There should be a new way of reviewing planning appeals and the Planning Inspectorate should be abolished in its current form. The new way could include nominated panels which include local councillors and planning professionals based in the local authority area or county of Kent.

Question 86

Future development opportunities to provide a mix of uses in Chatham town centre and its waterfront should be actively pursued. Ideally, Chatham town centre should have a single MP which

represents that area. A development manager should be appointed to oversee Chatham's rapid improvement.

Bryan Fowler



Name: Nicola Fox

Reference 157

Organisation

On Behalf Of

Type of Consultee Member of the public

maryott, kyle

From: Sent: To: Subject:

29 February 2016 21:40 policy, planning Medway Plan

Follow Up Flag: Flag Status: Follow up Completed

My view is new housing should not be built on ANY farmland.

Medway is too congested now. No more.

Let's make Medway great, not compacted with too many people.

Regards Mrs N Cox

Sent from my iPad

University of Greenwich, a charity and company limited by guarantee, registered in England (reg. no. 986729). Registered office:

Old Royal Naval College, Park Row, Greenwich, London SE10 9LS.

Name: Brian Corbett

Reference

158

Organisation

Medway and Swale Boating Association

On Behalf Of

Type of Consultee

Charity/Community/Faith Group

MEDWAY COUNCIL LOCAL PLAN Issues and Options 2012 to 2035 Consultation Document

A RESPONSE FROM THE MEDWAY AND SWALE BOATING ASSOCIATION (MSBA)

DEVELOPING A VISION FOR MEDWAY IN 2035

QUESTION

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

ANSWER / COMMENT

The Medway is the river which flows through a large urban cluster of towns. Other similarly sized and positioned urban conurbations e.g. the cities of Plymouth and Cardiff have been regenerated making maximum use and recognition of the value of their rivers and waterfronts. The vision should involve lifting the perception of Medway to the attractive level that its location deserves. By 2035 the River Medway, from Rochester Castle to Upnor Castle, incorporating the historic dockyard, should have been established as a World Heritage Centre. There is absolutely nothing served by another application being made by the historic dockyard alone. Such an ambition can only be realised if the whole community is involved.

ECONOMY

QUESTION

16) What are the opportunities for further business growth in and close to town centres in Medway?

ANSWER / COMMENT

The underutilised areas of the dockyard, e.g. No. 2 Basin, and; River Medway creeks offer business opportunities related to leisure boating. This needs a strategic examination of the Medway marine environment.

TOURISM

QUESTION

22) What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?

ANSWER / COMMENT

There are no touring camping sites or designated motorhome parking areas within the towns or especially near the river. More camp sites for tourists and Motorhome parking areas are needed in the towns.

QUESTION

23) What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?

ANSWER / COMMENT

As above- More opportunities for tourists to stay longer in the area. Medway is on the main tourist route from the channel ports but has nowhere for people to stay except for hotels

The historic dockyard; Rochester Castle and Cathedral; Upnor Castle; Temple Manor; Dickensian history, both in Rochester and on the Hoo peninsula; Saxon Shore long distance path and other rights of way through the saltings and over the North Downs. Although these are, in the main, administered by different organisations, they all add up to an area which could support extended stay tourism. The regeneration of Medway should include development of a combined strategy to encourage visitors to see the area as a potential holiday venue. This is as important and as valuable as housing and commerce.

QUESTION

24) What role does the river and Medway's countryside have to play in developing tourism locally?

ANSWER / COMMENT

An enormous role. More overnight moorings for visiting boats are required. A town centre public slipway is required ideally with overnight camping/ parking facilities nearby. This will encourage trailer sailors, canoeists, hovercrafters and small boat owners of all sorts to spend weekends and longer in Medway.

Many Dutch, German and French yachtsmen would be pleased to include the River Medway on their cruising itinerary, given improved marina and river mooring facilities for visitors.

ENVIRONMENT

QUESTION

31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?

ANSWER / COMMENT

Clarification is required on how an increase on leisure activity on the river can be balanced with environmental concerns. Do SSSIs, SPAs, Ramsars sites and MCZs fit well with encouraging waterborne leisure activities?

BUILT ENVIRONMENT

QUESTION

33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?

ANSWER / COMMENT The answer to 23 above is relevant.

QUESTION

34) What characteristics do you think makes a good place to live?

ANSWER / COMMENT

A rural and urban balance; beautiful countryside; history; a marine environment; good services; good commuting. Medway has all of these in bucket loads. It's the perception that has to change. The Medway District council has to change the culture of the whole community and highlight the attractiveness of the area. No one said it was going to be easy!

TRANSPORT

QUESTION

74) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?

ANSWER / COMMENT

The pier at Strood should be rebuilt to a standard similar to Sun Pier and Rochester Pier. This, coupled with a landing at the Medway City estate would encourage the development of a water taxi facility.

As stated above; more overnight moorings for visiting boats are required. A town centre public slipway is required ideally with overnight camping/ parking facilities nearby.

Currently some of the existing river accesses are actively discouraged and we should try to get a more positive attitude from the authorities. Some perfectly usable launching sites have barriers for no apparent reason, eg Copperhouse Lane. Riverside Country Park would be a great place for launching small vessels but the Council closes the barriers and disallows overnight parking.

Enhancing the area as an attractive destination for visitors is essential. Maintaining part of the river frontage for leisure rather than just selling it for housing would lift the area considerably and should be part of the local plan.

Medway and Swale Boating Association 19 February 2016

Name: Keith Martin

Reference 159

Organisation

On Behalf Of

Type of Consultee Member of the public

From: "Keith Martin" Date: 22 February 2016 at 17:19:49 GMT To: Subject: Neighbourhood plans

I attended the Neighbourhood Plan presentation at Cliffe Woods on 20th Feb and these are my comments.

1. It concerns me that the proposals so far, are all what developers and land owners would like to see happen to the villages, they are not what the villagers have said they want. I haven't heard anyone from the villages say they would like to see vast areas of the village concreted over.

It seems to me that the developers and landowners have looked at our villages and decided they could make vast sums of money by taking advantage of us and our villages. They are not doing it for

our benefit but for their own. It's seems that it's motivated by their greed for profit not for the benefit of the villages. Is it a Neighbourhood Plan that's being prepared or is it a Developer's Plan?

The proposals, almost without exception, will totally change the whole character of our **villages** for ever. If any of these major proposals go ahead the village character, which most of us have chosen to live in, will be changed into a **mini town or vast, featureless, impersonal housing estate**, destroying valuable farm land, the beautiful views over the surrounding countryside and open fields close by, destroying the general openness of the whole area where we live, and the neighbourliness of living in a relatively small community.

Once the developers and landowners have said what **they** want to do, we, the people that actually live here, are virtually faced with a 'fait accompli'. Proposals which are on the table will always be what the authorities focus on, and push through if it suits them. If it's supposed to be a neighbourhood plan, then surely, the people of the neighbourhood, should be asked **first** if **they** have suggestions that **they** would like to propose for our villages, not have these things imposed upon us.

2. If these plans were to be implemented, almost doubling the size of our villages, then in addition to what's mentioned above:

a. our schools would obviously be completely inadequate to cope with the large increase in children. Of course, these schools can be enlarged, (doubled?) in size if there is space, but then again we lose the benefit of the intimacy that a smaller village school provides, to the detriment of all our children.

b. our doctors surgeries, which at present often find it difficult to cope, would need to be significantly enlarged or completely replaced, to cope with almost double the numbers of patients. Again, losing the benefits of a relatively small GP practice, where you are often known personally, and being presented instead with a large, impersonal, conveyor belt system where we all become just numbers as in a hospital, seeing a different doctor every time you attend.

c. our sewage system, which was installed for a much smaller number of people, would possibly not be able to cope, requiring a very costly upgrade or replacement. It already seems to have a significant problem, based on the awful sewage smell that always seems to be present at the bottom of Lee Green Hill as you approach Cliffe Woods from Strood.

d. our existing approach road from Strood is already seriously undersized and overloaded by the volume of large lorries, buses, coaches and cars. It's a small country road, almost doubling the population would make this situation intolerable and dangerous. Of course, if enough money is thrown at it the roads could be widened and straightened etc. to deal with all the extra traffic, but then again, we'd become more like a town rather than the country village that many of us chose to live in.

3. I recognise that many more homes are needed within Medway but surely we should recognise that in this area we have towns and we have villages. Let the towns continue to be towns and let the villages continue to be villages, not try and make the villages into mini towns. I'm sure that if we looked imaginatively at our existing towns we could find many areas where more housing could be constructed. Our town centres are very poorly utilised with dozens of redundant or poor quality shops which offer very little value to the towns and just become vast numbers of charity shops. Just because the landlords or land owners may not have **offered** them shouldn't mean that they aren't considered as potential locations for the housing needed. It's likely that many, if not most of these properties are owned by investment companies or similar that see them money making opportunities rather than wanting to productively enhance the areas where they are situated. I believe the local authority should actively investigate how these, and other redundant areas could be used to meet the additional housing need, (**not waiting for them to be offered by the owners**,) rather than take good quality land in and around our villages just because someone wants to make a lot of money out of us and because we are seen as easy pickings.

K Martin. Cliffe.

Name: Phillip Clark-Rout

Reference 160

Organisation

On Behalf Of

Type of Consultee Business

maryott, kyle

From:	
Sent:	01 February 2016 13:28
То:	policy, planning
Subject:	planning strategy consultation document 2015-2016
Follow Up Flag:	Follow up
Flag Status:	Completed

Dear Sirs,

I am writing in response to the above document which I have studied at length. As the owner of Orchard Kennels & Cattery plus surrounding land ME88QJ (which falls within the new planned proposal) I would like to take this opportunity to register my support in favour of the proposal regarding future housing. I would be most grateful should there be any future developments which may impact upon my business and land that you keep me informed of any changes.

Regards

Partner Orchard Kennels & Cattery info@orchardkennelscattery.com

Name: Michael Dakers & Gill Dalton

Reference 161

Organisation Michael Gill Limited

On Behalf Of

Type of Consultee Business MICHAEL GILL LIMITED 20 Roebuck Road Rochester KENT ME1 1UD



Statement & Comments on Medway Council Local Plan – Issues & Options 2012 – 2035

These comments will be sent as an attachment to an email and delivered by hand and derive initially from questions 1, 2 & 3 of the above document. In the light of question 1 we believe that the key component of and ambition for the Local Plan's vision for Medway in 2035 should be to, with some immediacy, resolve the road network problems identified below which are vital to the ability of the Medway area to survive economically and efficiently. In answer to question 2 this seems to us to be the major strategic issue that the Local Plan should address.

1 Existing Road Network Problems

1.1 This all stems from the fact that there had been only one road crossing of the river Medway with exits on either side of the road until the Medway Tunnel was constructed. This, however, serves the Northern Ring Road and does not significantly assist the reduction of traffic problems passing through then Town Centres, particularly Strood, Rochester and Chatham.

1.2 The added challenge is that the old main road (the A2), which is the spine road serving all the Medway Towns travels east/west largely along or near the River Medway BUT AT STROOD/ROCHESTER IT CROSSES IT. Therefore there is a bottleneck which has long needed addressing and, particularly causes problems of conflict in Strood Town Centre by funnelling traffic off Rochester Bridge into it or through it towards the Bridge on two carriageways separated from each other but going through Strood Town Centre.

1.3 The effect of this is to cause intense traffic flow issues in the normal peak hours of, say, 08.00 to 10.00 and 16.00 to 19.00 hours, as well as an additional peak between 12.00 and 14.00 hours. Outside these hours and during the day the traffic flow is very restricted as well. The necessity for pedestrians to be able to cross from one side of the Town Centre to the southern main town centre part and, again, to the Strood Retail Park, requires pedestrian crossings which contribute hugely to the conflicts and interruptions.

2 Initial References in the Document

2.1 Although traffic flows play, and always have played, an important part in considering the vital infrastructure required in the Medway Towns it has very little presence in the Document being commented upon.

2.3 It is referred to, but only slightly, under the heading of "Transport" in that paragraph 25.2 recognises deficiencies. The focus of the next 4 paragraphs 25.3 – 25.6 inclusive, seems to be on everything but roads. Only beginning at the second sentence of paragraph 25.7 is there any reasonably mention. The relevant parts are:

"Medway has a number of heavily trafficked roads and some general concern about congestion on the road network, which also results in air quality issues. Some sections of the A2 are operating well beyond their notional capacity, resulting in recurrent congestion especially during peak times."

2.4 Apart from that there is nothing else or in the questions that follow this section raising the issue of how to resolve road congestion and air pollution, which is causing problems in relation to the ambience of persons frequenting the Strood Centre. The only reference that appears to arise is at paragraph 1.5 when that paragraph obliquely refers to these issues in the context of "approaches to the Town Centres".

3 Apparent Intention of the Document

3.1 In paragraph 2.3 it is clearly stated that it is the intention of this Issues & Options Document sent out for consultation to base the preparation of a new Local Plan. The last Local Plan was adopted on 2003 and is only operational at present due to "saved" policies and is considered out of date under the terms of the National Planning Policy Framework published in April 2012.

3.2 An allied concern to be taken into account in considering the document is the Statement in paragraph 4.8 of the expectation of a population increase of one fifth over twenty years. This flags up the undeniable fact that this challenge is not only imminent but more probably close to melt down if that stage has not already been reached.

4 Basic Misconception of the Document

4.1 At paragraph 10.8 (under the heading of current position of Medway Centres) it states "Chatham is Medway's highest order centre". It should not be regarded as such. It is "under performing" as stated later in the paragraph due to successive problems, some created by misguided decisions of Medway Council. As a result large sums of money have been wasted into this bottomless pit which have achieved nothing.

4.2 Chatham is no longer the most important centre of the Medway Towns. There is a large amount of dislike of having to go anywhere near the centre from long standing local residents. Much of this has been caused, or enhanced, by the reckless decision of Medway Council to remove the effective Ring Road system some years ago and substitute it with a two-way system which did not entirely encircle the town.

4.3 The Ring Road had been set up in the late 1980s/1990s as a result of consideration of two plans, one of which was the plan that was subsequently dusted off and now replaces the originally preferred ring road. Without re-rehearsing the

arguments that some local stakeholders put forward at the time of the change about the proposed two-way system creating stoppages at cross-overs; inability to move traffic on swiftly; and a general inefficiency, it was installed replacing a reasonably free-flowing and effective means of getting round or into Chatham.

4.4 Chatham lacks any ambience that might be attractive to those customers and lost support which was proven by the withdrawal of such major stores as M & S and W H Smith. It also lost a major Tesco Superstore at its eastern end. It is understood that Debenhams Department Store is struggling.

5 Strood Town Centre

5.1 In the light of that failure with Chatham and the substantial monies wasted on it, Medway Council should adopt a strategy that would be likely to be more productive and successful for the benefit of the large proportion of its residents.

5.2 It is recognized in paragraph 10.11 that:

"Strood Retail Park is performing significantly better than the main Town Centre, but poor linkages limit the extent to which the Town Centre benefits from these high levels of trade".

Afterwards it is noted that Strood is:

"particularly strong in terms of convenience retail with 74% citing this as the main reason for their visit".

The Document then identifies the problem:

"Strood also suffers from a poor environment exacerbated by levels of <u>through</u> <u>traffic</u>" (our underlining).

5.3 That latter comment is right but it is not only pollution that is a problem, but also the fact that both eastbound and westbound carriageways pass through the Centre, the latter effectively separating by a wall of moving traffic the Retail Park from the main Town Centre. The Town Centre itself is split in two by the High Street which is a further wall of moving traffic, creating considerable pollution, along which passes the eastbound carriageway.

5.4 There are pedestrian crossings, all controlled by traffic lights, but they too are part of the problem and are certainly not the solution. The solution is to provide an Inner Ring Road taking the traffic effectively taking the traffic out of the Town Centre and Retail Park area save for access and for parking. This would create an acknowledgement of the practical extent of the Town Centre at present and enable easier pedestrian passage around it.

5.5 There should additionally be restrictions on HGV traffic in Strood Centre and a plan firmly put in place with priority intention to take through traffic direct towards the M2 motorway from the western end of the Rochester Bridge.

6 Local Plan History

6.1 We are aware that in 1928 the issue of traffic problems in Strood and its effect on the Town Centre there was being raised within Local Government circles. The first local maps covering the Medway Towns produced by Kent County Council in the 1970s indicated firmly a plan to put in this Inner Ring Road for Strood, and its line was clearly defined.

6.2 In the Local Plan preceding the 2003 adopted plan, this defined inner ring road was one of the important transport initiatives laid out. However in the 2003 Adopted Plan the proposal had obviously been down-graded, albeit that that was a misguided decision, so that the ring road no longer appeared as a defined proposal and all that was mentioned was in the context of the conflict of the A228 crossing the A2.

6.3 That was a serious deficiency in that Plan which, as this Core Strategy is intended to be a replacement for it, and to be adopted for development purposes (paragraph 2.3) this serious omission needs to be corrected. Until the road network system is tackled bearing in mind the increase in population that is expected, the most vital thing to be done in the Medway Towns is almost wholly disregarded in this Document.

7 Summary

7.1 Therefore the initial question as to what strategic issues should be addressed has by this comment been identified as the road network system and bringing it into the 21st Century let alone that nothing was done in the 20th Century. All other development, bearing in mind that traffic flows have been a consistent problem in the Medway Towns and that people generally prefer to use cars than any other means of transport, should be decided only when the essential infrastructure is addressed. This is urgent. The alternative is that the Towns will grind to a halt.

These comments are prepared by Michael Dakers, Legal Member of The Royal Town Planning Institute, Solicitor (Non Practising) and Director of Michael Gill Limited, the owner and developer of Michael Gill Building, Tolgate Lane, Strood ME2 4TG – a development of 5 retail shops and substantial offices above.

Name: Nicholas Dowling

Reference 162

Organisation

Peter Brett Associates LLP

On Behalf Of

Type of Consultee Business Your ref: Our ref: 37506/ASH/TAA/ND/vlc6277

29 February 2016

Planning Policy Regeneration, Community & Culture Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

Email: Planning.policy@medway.gov.uk

Dear Sirs

RE: Regulation 18 Consultation representations on the Medway Local Plan issues and options report 2012 -2035

Please find attached our comments and representations on the above document which we submit on behalf of our client AC Goatham and Son.

As outlined in our technical note we reserve the our right to amend, modify and update the comments made in this document by the 24 March 2016 in light of the publication of the Strategic Housing and Economic Needs Assessment (SHENA) and the information contained therein, which as yet we have been unable to review.

If you could confirm receipt of this letter and the attached technical note which contains our comments I would be most grateful.

Yours faithfully

Nicholas A Dowling Director of Development On behalf of Peter Brett Associates

Encs.

J:\37506 - RE - Pump Farm Rainham\BRIEF 0003 - Planning\CORRESPONDENCE\Letters\6277 Medway Local Plan Issues ND vic 29-02 16.docx

Registered Office: Caversham Bridge House, Waterman Place, Reading, Berkshire, RG1 8DN, UK. Peter Brett As or lature LLP is a limited liability partnership and is registered in England and Wales with registered number OC334398. A list of members' names is open to inspection at our registered office. Brett Consulting Limited is wholly owned by Peter Brett Associates LLP Registered number: 07765026.



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Job Name:	PUMP FARM, RAINHAM
Job No:	37506
Note No:	1
Date:	Monday 29 February 2016
Prepared By:	Nicholas A Dowling
Subject:	Regulation 18 Consultation; response to "Medway Councils Local Plan
Issues and O	ptions 2012-2035"

Introduction:

This document has been collated by Peter Brett Associates who are acting on behalf our clients Ac Goatham and Son. The responses outlined in the note are in submitted in direct response to the questions outlined in the document "Medway Council Local Plan issues and options 2012-2035". The views expressed in the note are submitted in order to help Medway Council produce a Local Plan which is based upon a holistic response to the many and varied challenges facing Medway over the next 20 years.

In light of the publication of the Strategic Housing and Economic Needs Assessment (SHENA) the Strategic Housing Market Assessment (SHMA) and the Employment Land Needs Assessment (ELNA) for consultation on the 24 February 2016 we have therefore not had time prior to submission of our initial comments with regard to the issues and options report to take into fully account the information contained in the SHENA. We therefore reserve the right to update these initial responses by the 24 March 2016 in light of our further study of the SHENA.

Question 1) what do you think should be the key components for the local plan Vision for Medway in 2035.

Given the challenge of providing for 20% projected growth across Medway to 2035, the key components which should be incorporated into the Local Plan Vision should include:

- Balanced growth across the urban, suburban and rural communities ensuring the benefits of this growth is evenly spread across the different settlements.
- Development should provide for:
 - o Economic growth
 - o Social resilience
 - Enhancing the interface between built up areas and natural assets in order to add value to both urban and suburban settings rural settlements and the natural landscape





- Whilst it is vitally important that investment and regeneration produce a quality and economically successful environment, it is important not to focus solely on urban regeneration.
- On 20 August 2015 central government published in its 10 point plan for boosting productivity in rural areas, recognising the importance of the rural area to the national economy. It is therefore suggested that the needs of rural settlements in terms of their economic, housing and social needs are considered alongside the urban areas of Medway to provide resilience and increased productivity across Medway as a whole.

Question 2) What do you think are the strategic issues that the Local Plan needs to address?

The complex and evolving nature of the housing market in Medway will require a flexible approach with regards to the provision, location and mixture of housing provided in the Local Plan. The Local Plan is required to take into account the strategic demand for housing as defined in the ONS figures, the Strategic Housing Market Assessment (SHMA) and the resultant Objectively Assessed Need (OAN). It is unlikely that a strategic focus on the urban areas of Medway would be sufficient to meet either the scale or mix of development required range of residential properties identified. A wider and more balanced approach is proposed in order to resolve the scale and mix of development required in Medway.

Question 3) How should the Council respond to these issues?

To respond to these requirements Medway should proactively examine development options which include Urban regeneration, suburban extensions alongside the development of rural settlements in accordance with the broad scope of policy direction outlined in the National Planning Policy Framework (NPPF).

Question 6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?

Given the evidence in the SMHA which show relatively low market prices for housing when compared with adjacent Local Authorities, an affordable housing requirement set at 25% would seem and appropriate figure for development across Medway. Similarly a threshold of 15 units seems and appropriate threshold at which affordable housing is required. The simplicity of the 25% requirement combined with a simple 15 unit threshold is supported as it avoids potential differing interpretation of policy which occurs when site area thresholds are introduced in addition to the numeric threshold.





Question 7) What form of housing best meets the needs of Medway's growing population of older people?

Ultimately the answer to this question will emerge from the evidence and market research undertaken as part of the Local Plan process. Evidence from other Local Authorities in Kent has shown that the extra care model provides a mixture of independent living in addition to having access to extra care on site on an "as and when" required basis. A mixture of apartments and houses can be covered by the same care provider within a single development. The model can also be applied to other groups which are represented in Medway (for example vulnerable adults). It is suggested that extra care facilities are developed as part of a holistic mixed use residential lead development to ensure social cohesion and economic viability.

Question 9) How development can make a positive contribution to the health and wellbeing of Medway's communities?

The resolution to this issue is found in the NPPF definition of sustainable development outlined in paragraph 7. By providing local communities with:

- The housing required
- Improving the economy thereby alleviating poverty through increased employment
- Improving social resilience to change by proving development which enables and enhances the ability to meet with others by design and through services offered in the development.
- Improving access to open natural space both within and adjacent to developments in urban, suburban and rural areas.

Question 10) Do you have suggestions for potential sites for starter home developments.

Land at Pump Farm, Pump Lane, Lower Rainham is available and deliverable as a site which could form part of a wider allocation for a suburban extension east of Gillingham running west to Lower Rainham, south of the B2004 and north of the railway. The site has a potential capacity of between approximately 750 to 800 units 25% of which could be starter home provision. These starter and market homes could form part of a wider provision of a mixed use allocation between Gillingham and lower Rainham incorporating local centres providing retail leisure, schools and local services.

Question 11) How do you consider the infrastructure needs of starter home and self-custom build should be addressed?

By co-locating these forms of residential within larger market housing allocations it is envisaged that the viability of the wider site will ensure that infrastructure costs are spread widely over a larger number of residential units thus helping to make the cost of infrastructure per market unit more viable.

Question 12) How should the council provide for the demand for the land for self and custom build housing? For example, integrated with larger developments, on



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standalone sites, or linked to place making ambitions to deliver highly sustainable and innovative design.

It is proposed that self-build developments are incorporated within larger housing developments and designed as an integral part of the whole development. The scale density and design of the self-build elements of the development should be covered by a design code which is prepared so as to incorporate quality design without being prescriptive in terms of plan and elevations this in turn allows for quality innovation.

Question 13) What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's down centres.

The size of the market for student accommodation is for the evidence base to dictate. However, given that many students work to support their time in education it would seem that a location for student accommodation would best be sited between educational institutions and town centres with easy access to public transport, cycle and footways. Student accommodation is suitable for higher density urban development.

Question 17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?

The evidence base needs to examine and identify the type and locational requirements of the businesses that exist and are emerging in Medway, and the Local Plan is required to identify sufficient employment land across Medway to meet these needs.

Question 21) how should the plan address the specific locational requirements of some businesses? For example access to wharves.

Wharves are important assets for businesses allowing for access to sustainable forms of bulk transport thereby improving efficiency and productivity. There is however competition with residential development on waterfront sites due to the added value that is achieved by a waterfront location. The Local Plan should ensure that economic access to wharves should be balanced positively against residential demand.

Question 26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

With a 20% increase in population in Medway over the next 20 years there will be a proportional increase in opportunities to create vibrant town and local centres. However this is counter balanced by online retail and competition from other larger centres including Maidstone and Bluewater Shopping Centre. The Local Plan will need to identify urban design strategies which act to counteract the continuing decline of town and local centres, and seek to secure the future of the Districts Town and local centres.

Question 27) What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential ?



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The key to producing economically viable town centres is to attract sufficient critical mass and passing trade to allow businesses the opportunity to sell their goods and services. The European model of the town centre which includes a mixture of retail, food and drink, commercial (offices), leisure and residential. This mix of uses provides two vital key elements:

- A vibrant and attractive destination for the community to utilise as a social and commercial resource.
- Provides critical mass of footfall to ensure access to sustainable markets for businesses

Question 32) What approach should be taken to determining the role of the landscape in producing a spatial strategy for the new Local Plan, and development management policies?

It is proposed that the interface between new development and the existing values landscapes is used to create mutually beneficial value.

Developments should use the open space requirement to design landscape which reinforces the character of the existing landscape thereby blending new development into the existing landscape. Using cues in the existing landscape the built form of the development will then reinforce the relationship between built form and the natural environment. By co- locating with valued landscapes a mutually reinforcing relationship can be established adding value to both.

Question 33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?

NPPF Para 126 recognises that there is a mutually beneficial relationship between the historic environment, historic assets and new development if managed correctly. The historical environment is irreplaceable and must be placed in a position of value. New development can provide the economic and social impetus for regeneration of historic environments if planned with care and quality.

Question 34) What characteristics do you think makes a good place to live?

A good place to live will depend upon the context in which the development is located. In terms of historic centres, successful city centres are characterised by:

- A place where economic, residential and leisure uses are mixed.
- A vibrant well designed public realm
- A place where the timeline of the urban history is easily read in the urban fabric from the distant past to the present.

Question 37) What requirement should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?





The requirements for design will differ dependent upon the setting of the development in question. Requirements for scale, setting bulk and density will differ between urban, suburban and rural sites. Therefore a balanced and bespoke approach to character will be required on a site by site basis dependent on their settings.

Question 40) How the Local Plan addresses the need to maintain and improve access to services in rural areas?

Firstly it is noted that in the housing section of the Medway Local Plan Issues and Options 2012 -2035 report, there is no examination of the issues of rural housing. The government is committed to improving the nation's productivity and has identified that the nation's rural communities are vital to this initiative. The government's current rural planning review is aimed at taking measures to address regulatory constraints to help provide an increase support for new homes, jobs and innovation in the rural areas of the UK.

It is therefore vital that the Local Plan addresses the issues of rural housing and the resilience of rural communities.

The most important way in which services in rural areas can be improved is by providing a critical mass of population in the rural areas. To enable this to happen the Local Plan should take its lead from the NPPF (in particular paragraphs 28, 54, 55) in conjunction with the findings of the rural planning review call for evidence as it emerges.

Question 43) What changes to the built environment could facilitate healthier communities?

By using the definition of sustainability as outlined in the NPPF within the Local Plan, it is proposed that communities will become healthier across the three aspects of sustainability i.e. economic, social and environmental. Improvements in these three aspects will lead to an incremental improvement in the health of communities.

Question 45) how can the Local Plan most effectively promote greater physical activity in Medway?

Access to open space, footpaths, cycle ways and sports facilities in close proximity to residential and employment areas is key in reducing the barriers to physical activity in Medway.

Question 46) What changes to the current sitting of healthcare facilities should be considered in the Local Plan? Are there opportunities to provide new sites, and /or to integrate health services in local communities?

The integration of health care services into the local communities via a number of initiatives is seen as being helpful:

- Extra care housing model commercial or community based
- Distribution of multi service facilities such as doctors surgeries across the existing communities.
- The provision of multi-function community halls which are designed to enable and incorporate visiting surgeries and clinics.





Question 47) How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development?

School provision should be subject to a planned delivery process. If local schools are at capacity then delivery should be brought forward in conjunction with front loaded allocations.

Question 48) What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?

It is important that multifunction community halls are provided to enhance and enable physical, spiritual and social health of communities. Provision can be delivered via section 106 or CIL contributions. The facilities could be run and managed by community organisations including churches, religious organisations and local community initiatives.

Question 49) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?

Given current and projected future reduction in Local Authority Budgets across the board it will be important for Medway to examine the current cost benefit analysis of the open space state and compare the availability of funding in the future against the benefit. It may be on examination that rationalisation will be required. In doing so it may be that opportunities can be identified for allocation for alternative uses.

Question 50) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?

Given the projected rate of growth there will be inevitable competition between open space and land allocated for development. It may be that increasing the level of provision of open space is undeliverable.

Question 51) Should we move to a multi-function hub model of provision, and what might this look like in practice?

A multi-function approach to open space may be a way of increasing the effectiveness of the existing open space provision across Medway.

Question 52) Should the development provide on-site open space, investment in the existing estate, or a balanced of the two approaches?

The provision of open space within developments would help balance some of the under provision identified in the open space provision noted in the report. The co-location of open space with developments allows for easy access to the open space provision.





Question 55) How should the Local Plan address the aspirations for a new stadium for Gillingham FC?

The proposed re location of the Gillingham football club to a site adjacent to Yokosuka Way would provide benefits at a number levels:

- Firstly the relocation would provide for a sustainable residential development within ½ a mile of Gillingham railway station
- The relocation of the football stadium on a site to the east of Yokosuka Way has the ability to act as a catalyst for regeneration and edge of town urban extension between Yokosuka Way to the west Berengrave Lane to the East, the railway line to the South and the Rainham Road to the North.

Question 56) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

The weight given to the protection of the best and most versatile agricultural land needs to be balanced within a hierarchy of protections of the natural environment which exist across Medway

These include European, National and Local protections. The local Plan will need to necessarily balance the various levels of protection. It is suggested that the protection afforded to best and most versatile land is placed lower in the hierarchy of protections in order to be able to fulfil sustainable growth across Medway.

Question 61) What should sustainable development look like for Medway? What plans and policies should we put in place to achieve this?

Sustainable development in Medway should follow the principles of sustainable development outlined in NPPF Paragraph 7 incorporating an economic, social and environmental role.

Question 62) How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?

In making significant efforts to improve the economic performance of Medway significant inroads into the significant inequalities which exist in Medway will be made. The NPPF recognises explicitly the role of housing as an economic regenerator via its ability to create jobs in the area being developed. By delivering housing in a rapid and efficient manner the Local Plan can make a significant improvement to the existing inequalities.

Question 77) Should we consider setting different rates of affordable housing and CIL contributions to take account differing viability between areas of Medway.





The response to this question can only be answered from the information emerging from the evidence base as the Local Plan progresses. Viability assessment of the different areas of Medway will dictate if a differential rate is appropriate or required.

Question 80) Are the development principles right? Should other guiding principles be introduced?

The principles outlined are appropriate for urban developments. However for suburban and rural developments it will be necessary to examine other space ordering principles that are not focused upon the urban block. Density in Urban sites will necessarily be higher than in the suburbs and rural areas. The location of developments relative to existing services, infrastructure and transport is an important element which needs to be incorporated within the principles.

Question 82) Which development type or (combination of types) do you think best meets the identified growth requirements for Medway?

A balanced allocation of residential development across city, town and rural areas will help to ensure:

- That 20% growth is met evenly over Medway
- That the economic social and environmental benefits are evenly spread across Medway
- That the Rural settlements become economically and socially resilient.

Question 84) should the green belt boundary be reviewed?

Given the size of growth projected across Medway a review of green belt boundary review would seem to be essential to ensure that all potential sites have been examined and assessed in terms of suitability and deliverability.

Question 85) What provision should be made for mixed use in residential developments, both high density and lower density?

The provision of mixed use in residential developments on high density urban sites as well as on lower density suburban and rural sites will provide the ability to co-locate housing with employment and local services. This could significantly reduce car journeys across Medway.



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Reference 163

Organisation

Dean Lewis Estates

On Behalf Of

Type of Consultee

Developer/Consultant

Medway Council Local Plan Issues and Options 2012-2035

> Consultation response by



February 2016

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APPENDICES

Appendix 1 - Site Location Plan
1 INTRODUCTION

1.1 Context

- 1.1.1 Dean Lewis Estates is a professional strategic land promotion company specialising in the delivery of residential development with associated community infrastructure.
- 1.1.2 This submission provides Dean Lewis Estates response to and representations in respect of the Medway Local Plan Issues and Options consultation 2012-2035.
- 1.1.3 This submission focuses on the key planning policy considerations for the Medway Local Plan in order to enable its successful implementation, thereby sustainably meeting the identified full objectively assessed needs for housing (OAN).

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. A failure to demonstrably execute the duty to cooperate cannot be rectified through modifications.
- 2.1.2 Medway adjoins authorities within the south east and shares a functional relationship with wider area in the context of its housing market area. Significant unmet housing need and demand is evident within this housing market area.
- 2.1.3 The unmet housing needs of London is a crucial factor that must be addressed within the evolution of the Local Plan. This matter also must be properly addressed within the auspices of the duty to cooperate.
- 2.1.4 It is noted within paragraphs 4.7, 6.2, 8.5, and 9.2 of the I&O that London's growth will impact upon Medway in the context of housing, economic growth and environmental consequences. Medway will undoubtedly have a role to fulfil in assisting in the delivery of unmet need.
- 2.1.5 Dean Lewis Estates will wish to see clear evidence that Medway Council Local Plan has executed its' duty to cooperate by working with neighbouring authorities in order to address the cross boundary strategic issue of unmet housing needs.

2.2 Sustainability Appraisal

2.2.1 Section 19 of the 2004 Planning and Compulsory Purchase Act, requires that Local Plans are tested by way of a Sustainability Appraisal (SA), thereby meeting the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The SA should be carried out at each stage of the Plan's preparation. It is not clear that Medway has undertaken an SA on the Issues and Options. If this is not the case, then we would urge that one is undertaken as matter of expediency and the results made publicly available at the earliest opportunity.

3 OBJECTIVELY ASSESSED HOUSING NEED

3.1 Background

- 3.1.1 It is noted that Medway Council is also currently carrying out public consultation in respect of the Strategic Housing Market Assessment and the Employment Land Needs Assessment until 24th March 2016. Dean Lewis Estates will take the opportunity to review and respond to these documents in a timely manner.
- 3.1.2 Is should be noted however that these documents form essential components of the council evidence base that will inform the 'Vision' for the growth of Medway and spatial policy choices in order to enable successful delivery of that vison by 2035. For instance, the matters arising in respect of meeting London's housing need is not sufficiently canvassed in the Issues Options. A Sustainability Assessment for the Local Plan has yet to be undertaken which should properly have regard to factors arising in respect any additional growth needs. The findings of the Issues and Options should be treated with caution. Medway council should publically determine whether a further Issues and Options consultation should be undertaken when crucial factors, such as the full objectively assessed needs (OAN) are fully known.

3.2 Medway - Objectively Assessed Housing Need

- 3.2.1 The North Kent Strategic Housing and Economic Needs Assessment Strategic Housing Market Assessments was published by the Council in late February. Dean Lewis Estates will review these documents and respond accordingly.
- 3.2.2 Dean Lewis Estates will work positively with Medway Council to assist with the successful delivery of the full OAN.
- 3.2.3 Should the evidence base demonstrate that delivery of the full OAN is constrained, Dean Lewis Estates require that the council produces clear evidence as to how it has sought to reduce or eliminate significant adverse impact in the pursuit of its' development options. Where avoidance or mitigation is not possible, evidence should be adduced to demonstrate that compensatory measures have been deployed.

4 MEDWAY ISSUES AND OPTIONS

4.1 Question 1 – Vision

What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

- 4.1.1 The 'Vision' for Medway should be ambitious. It should recognise the needs of the community as the underpinning principle of its purpose. In this regard Medway should;
 - Meet the full needs of its existing and future resident community by providing sufficient homes, employment, community and social infrastructure.
 - It should plan to remain economically successful and help to address social inequalities particularly for the most vulnerable within the community.
 - The Medway transport networks must be sustained and enhanced through additional development wherever possible.
 - Medway must balance its' growth needs with the need to bring about biodiversity net gains within the environment.
 - In achieving improvements in environmental sustainability it should be recognised that development can give rise to greater habitat diversity.
 - Medway should accommodate significant growth whilst remaining an attractive and vibrant place where people want to live.

4.2 Questions 2 & 3 – Strategic Issues

2) What do you think are the strategic issues that the Local Plan needs to address?

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3) How should the council respond to these issues?

- 4.2.1 A number of key issues should be enshrined within the Local Plan policy framework
 - The Local Plan should plan to ensure delivery of its' full OAN.
 - The Local Plan should take an equitable proportion of London's unmet housing need.
 - Via the Duty to Cooperate, in return, London should procure CIL funds to secure necessary upgrades to the strategic transport network to enhance connectivity between Medway and the city of London.
 - The role of the Green Belt within wider southern east authority's area should be reconsidered. If the metropolitan green belt is to remain in place as a policy tool its boundaries may require alteration to enable sustainable growth.
 - The Hoo Peninsula should be recognised as having both an important environmental role to play in the context of the wider Kent Biodiversity Strategy but also to accommodate significant growth at Hoo St Werburgh.
 - Hoo St Werbugh should be a main focus of growth on the Peninsula. A new community hub should be developed around the existing and proposed schools. Growth should complement and enhance existing provision at Hoo, providing for a significant increase in market and affordable housing, a commensurate level employment growth together with appropriate community infrastructure.

4.3 Questions 4 – 14 – Housing

Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

4.3.1 At the time of writing Dean Lewis Estates have not been able to review the SHENA produced by GVA as it was not published until near the end of this

consultation. We will therefore provide a fully considered response in due course.

4.4 Questions 15 – 21 – Economy

- 4.4.1 At the time of writing Dean Lewis Estates have not been able to review the SHENA produced by GVA as it was not published until near the end of this consultation.
- 4.4.2 The desired levels of job growth in Medway should seek to deliver economic growth on an upward trajectory to promote greater prosperity but also importantly greater opportunity for the scouring employment locally thus reducing the need to travel. This means building sufficient homes to meet the needs of growing and prosperous economy.
- **4.4.3 Question 15** asks where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments? Dean Lewis Estates supports the principle of location some employment at Lodge Hill which should serve the needs of the wider area on the Hoo Peninsula.
- 4.4.4 **Question 20** asks whether it is feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this? Reduction in travel as principle is a laudable aim for Medway, but a policy of self-containment would be both unrealistic and potentially damaging to the economy. Improvement in connectivity should be the focus of Local Plan policy together with improvements in strategic transport networks. Duty to cooperate and CIL arrangement with the city of London should have due regard to this matter.

4.5 Questions 25 – 29 Retail, commercial leisure & town centres

4.5.1 Questions 25 – 29 do not address the realistic prospect that the role of Hoo St Werburgh as a key Service Centre, serving the needs of wider area of the Hoo peninsula, should be enhanced. The Issues and Options should respond to this likelihood with a Local Plan policy provision that encourages the increase and enhancement of local retail facilities to serve Hoo.

4.6 Questions 30 – 32 – Environment

4.6.1 The Landscape Character Assessment undertaken in 2011 was prepared prior to the adoption of the NPPF and the publication of the PPG. The document must be reviewed to ensure consistency with the Framework and PPG.

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4.6.2 Local Plan policy should enshrine the principle that good design in well planned developments can deliver environment benefits as well as effective future maintenance and management of environmental assets.

4.7 Question 33 – 37 Built Environment

- 4.7.1 **Question 33** seeks to establish what approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?
- 4.7.2 The presence of heritage assets is a matter that should be accorded considerable importance and weight. Therefore, the policy approach must reflect this principle.
- 4.7.3 In doing so, it is equally important that the policy regime encourages development. Where development shares a relationship with a heritage asset and particularly where development will in future form part of the setting of that asset, the policy should be conditionally permissive. That is say that the juxta position of development should appropriately be a key policy consideration. Crucially, the policy should, as a matter of principle, also recognise that well designed development can have a positive impact on the setting of heritage assets. The policy should in no way act as an embargo on development rather it should embrace it and strive for good design that respects the identified importance of a heritage asset.
- 4.7.4 **Question 36** asks what areas of Medway have weaker character and what are the opportunities for improvements?
- 4.7.5 Hoo St Werburgh presents an opportunity to improve its character with the introduction of a community hub centred around the existing high school, proposed new primary school and swimming pool facility. The settlement of Hoo St Werburgh is attractive and vibrant, although its centre has become somewhat marginal to role and size. New growth centred around the location described will bring together a more cohesive settlement that functions not only top meet the day to day needs of the residents of Hoo but also serves the resident community of is' hinterland.

4.8 Questions 38 – 42 – Rural Issues

4.8.1 Dean Lewis Estates strongly support a policy approach within the forthcoming Local Plan whereby Hoo St Werburgh, as the largest village on the Hoo Peninsula, should be identified as a Key Service Centre in recognition of its current role and future potential role.

- 4.8.2 In order to properly support this role Hoo should be regarded in planning policy terms as a main focus for growth to serve the needs of the Hoo Peninsula.
- 4.8.3 There is some potential for Lodge Hill to play a complementary role in this regard. However, the realistic position in terms of speed of delivery and infrastructure cost at Lodge Hill, will undoubtedly impede its ability to deliver in full during this plan period.
- 4.8.4 Paragraph 13.1 of the I&O identifies the matter of a rising ageing population within the rural area. An exponential increase in this cohort of the community within the plan period may have a negative effect on the vitality and viability services. Whilst disposal income in the elderly population may be increased evidence demonstrates that actual spend declines. This can directly have an adverse impact on the ability to deliver and maintain key services.
- 4.8.5 Housing development that promotes a diverse demographic should be the policy choice in order to protect social cohesion.
- 4.8.6 Affordable housing provision within the rural areas is also disproportionately low in contrast to the main towns. Hoo St Werburgh provides an excellent opportunity to promote significant development of market housing that can viably cross fund the delivery of much needed affordable housing. Many younger people and families are presently denied the opportunity to live within areas of Medway due to disproportionate high cost of housing. Growth at Hoo St Werburgh offers an immediate opportunity to begin to address these social inequalities.
- 4.8.7 The provision of new housing will not meet the needs of the population but will also directly assist in the objective of maintaining the Hoo peninsula as an economically viable place and enabling to maintain and deliver new and upgraded social infrastructure such and schools, health facilities, local shops, leisure uses and community groups.
- 4.8.8 Dean Lewis Estates awaits publication of the Village Infrastructure Study and shall wish to take the opportunity to appraise it and comment on it at the appropriate time.

4.9 Questions 47 – 48 Social & Community Infrastructure

4.9.1 The I&O poses the question as to how best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development? Dean

Lewis Estates supports the approach of ensuring that new growth funds social and community infrastructure in a timely manner. However, realism must prevail and there has to be an acceptance that such provision can only happen in timely manner with significant public funding being made available to compliment funds drawn from CIL or S106 agreements. In the absence of public funding Medway must face the reality, synonymous with most the authorities in the country, that some infrastructure will inevitably follow growth. Growth must not be held back for this reason as the needs of the population would suffer greater harm if their housing needs are not met as priority. Therefore, the policy approach should remain focused on encouraging growth and to institute either a CIL or S106 regime at realistic and viable levels. It should not be so punitive so as to deter development.

4.10 Question 56 – Natural Resources

- 4.10.1 NPPF paragraph 112 states that; "Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality". Evidently this cannot be achieved in respect of Hoo. Therefore, in evolving the policy approach it must be accepted that there is no alternative but to promote growth in an area of Grade 1 agricultural land. It should be borne in mind that the Framework asks the policy maker to 'seek' to use lesser grade land. It is not an arbitrary approach.
- 4.10.2 It is also noted that the plan shown on page 72 entitled Agricultural Land Classifications is misleading. The entire settlement of Hoo St Werburgh is washed over with Grade 1 classification. This should be amended to reflect the urban land use.

4.11 Question 76 – 79 – Deliverability

- 4.11.1 Dean Lewis Estates welcomes the council's acknowledgement that an disproportionately high reliance on urban brownfield development may result in under delivery of the plan.
- 4.11.2 Deliverability of previously developed sites should be thoroughly tested, not only in terms of viability, but in terms of compatibility also. The longer gestation period for such sites to legitimately be in a position of deliverability should also be factored into the timescales for successful implementation of the plan.
- 4.11.3 The Local Plan must properly acknowledge in a policy context that PDL is not sufficiently available or deliverable to enable delivery of the plan.

- 4.11.4 Question 78 addresses how can we ensure timely and appropriate delivery of infrastructure to meet the needs of new and existing communities? What infrastructure types or projects should be prioritised where funding is limited?
- 4.11.5 A portfolio of different types of sites spread across Medway will provide the greatest chance of success of Council meeting its development needs sustainably. Funding procured from developments should be structured so as to aid cash flow of developers. This approach provides a realistic and more robust strategy for successful and timely delivery of essential infrastructure. Requiring weighty payments upfront or early on in the development of a site will impede growth. A policy in respect of infrastructure should enshrine this concept to ensure successful delivery.

4.12 Questions 80 – 87 – Development Strategy

- 4.12.1 Dean Lewis Estates welcome the council's commitment to significant growth in the Medway area through its local plan and are supportive of the Councils decision to consider a wider range of development options to meeting its need.
- 4.12.2 Development at Lodge Hill at present has no certainty with the developer formally withdrawing from the site. Planning for Options without the possibility of the Lodge Hill site is a well-founded approach within the I&O.
- 4.12.3 The I&O considers a range of alternative approaches that are aimed at securing residential development. The patterns diversity of settlements within Medway call for the deployment of a range of these options to drive growth effectively through the plan. A 'one size fits all' approach would fail to the delver the growth needed within the plan period.
- 4.12.4 For instance patterns sustainable urban extensions will be necessary to assist in the delivery strategy. But these alone should not be relied upon. Smaller scale, incremental growth will also constitute a vital role for early delivery.
- 4.12.5 Dean Lewis Estates strongly support an urban extension to the south side of Hoo St werburgh. The benefits of such an approach will be of great importance to the successful delivery of vital infrastructure that will help to sustain community life in Hoo St Werburgh and its' hinterland within and beyond the plan period.
- 4.12.6 A further potential for Option being considered by Medway is for new settlements. Dean Lewis Estates would support this option, however significant caution should be exercised in respect of timing and cost of delivery. The plan should not be over reliant on such an approach and should rightly recognise the

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high risk of failure. A contingency policy for growth should be enshrined into the plan should a new settlement policy fail to deliver.

4.12.7 In essence Medway council will require a combination of the various development options to ensure successful delivery of the plan.

5 SITE SUBMISSIONS

5.1 Introduction

- 5.1.1 Dean Lewis Estates strongly support the promotion of land to the south of Hoo St Werburgh for inclusion within the Medway Local Plan as a housing led, mixed use allocation. For reference please see the site location plan attached at appendix 1.
- 5.1.2 The site is demonstrably sustainable and capable of helping meet Medway's housing growth needs together with a commensurate amount of community infrastructure, some small scale employment, local retail provision, leisure and recreation and amenity land.
- 5.1.3 At this juncture detailed assessments have not been carried out but wherever possible baseline information is provided that demonstrates that the site is suitable, available and deliverable for the type of development described above.
- 5.1.4 The following summary is provided in respect of the site submission.

<u>Social</u>

- Deliverable Housing Site The site will make a valuable contribution to the 5 year rolling housing land supply of Medway. The proposal will assist in providing the supply of housing required to meet the needs of present and future generations. The whole site is deliverable within the plan period.
- Provision of Affordable Housing The site can deliver 25% policy compliant affordable homes. This is a significant material benefit given the chronic shortage of affordable housing across Medway.
- Provision of Market Housing the site will provide for high quality market family housing which meets the identified need in Medway, particularly serving the rural needs of the Hoo St Werburg and the wider needs of the rural area within the Hoo Peninsula.
- Mixed and Balanced Community The average age of the population within Medway has risen significantly and consistently during the last 30 years. It is now far higher than the national age profile. This, unfortunately, is in part due to the relative unaffordability of housing that has resulted in an imbalance in the demographic of the community to the

partial exclusion of younger people and young families. This site will assist in enabling younger people to live within Medway thus also helping to maintain the viability and vitality of local schools and local services and facilities.

- Primary School Hoo St Werburgh has an existing local primary school that potentially maybe relocated to land off Main Road. These proposals have the ability to make a valuable contribution to the funding of this essential community facility. The existing school role is populated by children from beyond the immediate settlement. Delivery of new facility or significantly enhanced existing school facility would enhance the capability of Hoo St Werburgh to serve the existing resident community and serve the wider needs of the Hoo Peninsula.
- ✓ Access to Community Clubs, Youth and all age Sports Organisations There are a range of clubs and societies available in Hoo St Werburgh and within the wider rural community. The proposals will help to support the vitality of these community groups and enhance community life. The proposals could also delivery a new community building that would act as a hub for community activities.
- Bus Service Hoo St Werburgh is well served by existing public transport which provides connections to wider services and facilities available at Strood, Rochester, Chatham and Gillingham thereby reducing car usage. The best and most sustainable way of maintaining and improving bus services is by additional customers using the existing routes and creating revenue for the Operators.
- Potential for additional retail provision The existing local retail provision within Hoo St Werburgh local is akin to a local village shop. The sites offers the potential to provide a convenience retail store that will enable the community to carry out a weekly shop without having to travel further afield to Strood, thus reducing the need to travel for everyday provisions. The site also provides an excellent opportunity to provide additional district centre facilities.
- Health Facilities The development would support the provision of additional health facilities to meet the needs of the community provided there was clear evidence of need.

- Public Open Space The development of this site will deliver in excess of formal and informal public open space benefiting both the new and existing residents whilst contributing to the health and well-being of the community.
- New Pedestrian Links –New pedestrian links through the site that provide immediate access to the existing settlement, providing for ease of movement thereby encouraging walking, cycling and bus travel. The existing public right of way (Saxon Shore Way) to the south of the site will become integrated into the site encouraging greater and safe and accessible routes into the surrounding countryside. The site will be developed so as to encourage walking, helping to reduce car usage and promoting more healthy life styles.
- Travel Plan The new development will assist in establishing travel habits that concentrate on reducing reliance on the private car. The travel plan measures will be deployed from the outset of occupation of the development.

<u>Economic</u>

- Population Growth An increase in population within Hoo St Werburgh will help to sustain and support its role as key service centre and will reinforce the vitality and viability of the area, its businesses, services and facilities.
- Labour Force Supply The development will provide additional people of working age that, as economically active residents, will help to support the sustainability of Medway's economy.
- Construction Jobs –Full Time Equivalent (FTE) employment opportunities will directly arise from the site construction together with supply chain job opportunities.
- Resident Expenditure Residents would generate annual household expenditure of that will boost the local economy.

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✓ New Homes Bonus & Council Tax – Medway council be the recipient of significant funds arising in respect of the New Homes Bonus and future revenue from Council tax, all of which will help sustain essential facilities and services Medway.

<u>Environmental</u>

- Ecological Benefits The development site presents the opportunity for biodiversity enhancements. The site is presently predominantly arable farming land that is heavily improved. Ecological benefits will be realised through the protection and enhancement of existing wildlife corridors, but significant potential exists to create areas that will become naturalised areas for wildlife habitats. The provision of new green infrastructure within the development will enhance ecology.
- Biodiversity The development proposals will greatly enhance Flora and Fauna by way of introduction of gardens replacing intensively farmed and sprayed fields that presently are used for crop growing. This usage currently supports negligible biodiversity. The proposal will provide a net gain in biodiversity.
- Flooding Betterment The development proposals will discharge surface water from the site into a sustainable drainage system at less than Greenfield run-off rates therefore helping to reduce flood risk.

6 CONCLUSIONS

- 6.1.1 Dean Lewis Estates has considered the Issues and Options document and are generally supportive of the council's intent to deliver its OAN.
- 6.1.2 Dean Lewis Estates will take the opportunity to respond in full by 24th March 2106, having reviewed the SHENA.
- 6.1.3 The absence of a Sustainability Appraisal to inform the Issues and Options is concern in respond of future soundness of the plan. Dean Lewis Estates advocate that the SA is prepared and published for comment as a matter of urgency.
- 6.1.4 Dean Lewis Estates are generally supportive of the council's evolving policy approach and we are committed to entering into a proactive dialogue with Medway Council in order to develop a robust planning policy approach to deliver a sound plan.
- 6.1.5 The growth needs for Medway are significant and Dean Lewis Estates will play an active role in assisting the Council in securing deliverable development sites that will enhance the sustainability of Medway making it an attractive place to live.

APPENDIX 1

SITE LOCATION PLAN



Hoo St Werburgh Direction of Growth

Name: Matthew Williams

Reference 164

Organisation Savills

On Behalf Of Ellandi LLP

Type of Consultee

Developer/Consultant

29 February 2016



Planning Policy Regeneration, Community and Culture Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

Matthew Williams

Innovation Court 121 Edmund Street Birmingham B3 2HJ

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Dear Sirs

REPRESENTATIONS TO THE MEDWAY COUNCIL LOCAL PLAN ISSUES & OPTIONS CONSULTATION

Savills (UK) Limited (Savills) act on behalf of Ellandi LLP who own and manage the Pentagon Shopping Centre in Chatham Town Centre. This letter is submitted to provide observations in connection with the Medway Council Local Plan Issues and Options 2012-2035 Document.

Context to Representations

Ellandi was formed in 2008 and is a leading specialist shopping centre investment and asset manager. The approach is to proactively transform the towns in which it invests by working with occupiers and other stakeholders to ensure that its shopping centres perform a successful and vibrant role for the local communities that they serve. By pioneering a new form of shopping centres that are referred to as 'Community Shopping Centres', Ellandi is successfully increasing footfall for not only its shopping centres but the associated town centres securing. The result is a substantial positive effect on the vitality and viability of the associated town centre.

The Ellandi Community Shopping Centre Initiative is a truly community-orientated initiative which, amongst other things, seeks to facilitate through the planning process the repositioning of Ellandi's shopping centres, and the town centres they serve, at the heart of their local communities. By applying financial and intellectual capital to often under-invested locations, Ellandi has become a market leader in promoting centres. This promotion includes engaging with local stakeholders, empowering centre managers to connect with local people through events and charities and incubating complementary ancillary uses to ensure that the towns in which they operate thrive.

Driving Ellandi's strategic focus is a fundamental and unwavering belief that community improvement, regeneration and financial return are not mutually exclusive. Rather, it considers its shopping centres have a major role to play in terms of creating a positive impact that improves / regenerates town centres to the benefit of all those involved. This in turn has far-reaching and long term benefits including job creation, social cohesion and encouraging sustainable patterns of travel.

Importantly, Ellandi recognises that the town planning system has a fundamental role to play in supporting their overarching objectives and therefore welcomes this opportunity to engage with the Medway Local Plan at this early preparatory stage. Ellandi look forward to continuing their positive working relationship with Medway Council to ensure the Local Plan promotes Chatham Town Centre as a focus for regeneration and growth and affords it adequate policy protection so that the investment strategy for the Centre can be brought forward effectively.





The Pentagon Shopping Centre

Ellandi acquired the Pentagon Shopping Centre in December 2015 as it provides substantial opportunities for positive asset management to enhance the retail, leisure and community offer within Chatham Town Centre. The town is the administrative headquarters of Medway Unitary Authority, as well as its principal shopping centre, being of sub-regional importance in providing goods and services.

The Pentagon Centre is located within the main shopping area of the Town Centre alongside the High Street. It currently comprises of 330,000 sq ft of retail space on two levels, with a 430 space car park. Adjacent to one of the largest Primark stores in the South East, key tenants include Boots, Sainsburys, New Look, JD and Wilko.

Chatham Town Centre has already benefitted from a significant regeneration programme which includes the new bus terminal, related infrastructure and town centre promotion. Ellandi has aspirations to work in conjunction with Medway Council to deliver improvements to the Pentagon Centre including introducing a large food store, leisure facilities and reconfiguring existing units to create larger floorplates capable of meeting modern retailers' requirements.

It is with the above investment in mind that Ellandi wish to make a number of practical observations in regard to the Medway Council Local Plan which, amongst other things, is intended to address the management and growth of the Authority's Main Town Centre (Chatham) and to ensure that it continues to fulfil a central role for both residents and visitors.

Our observations are focused in response to the key questions raised in the Issues and Options Consultation document. They are designed to be productive, to ensure the vitality and viability of Chatham Town Centre is preserved and enhanced in line with National Guidance, and to assist the Local Planning Authority in advance of the Local Plan being progressed towards Examination.

Developing a Vision for Medway in 2035

<u>Q1. What do you think should be the key components of and ambitions for the Local Plan's vision for Medway</u> in 2035?

Ellandi support the overarching approach to guide the future development of Medway, for it to be an economically successful, attractive and vibrant place where people want to be. This approach should require a focus on reinvigorating town and local centres within the Authority, and in particular that of Chatham as the principal shopping centre at the top of the settlement hierarchy.

It is noted that such an approach is best set out within the National Planning Policy Framework (NPPF) at Paragraph 23 where it is stated that Local Planning Authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. The NPPF defines suitable 'main town centre uses' as retail, leisure, entertainment facilities, which includes restaurants, bars and offices.

The 'Context to Representations' section of this letter sets out the vision that Ellandi is progressing with the regeneration of the Pentagon Shopping Centre. This vision is wholly consistent with the current strategy of the adopted Core Strategy and one that we would ask is maintained and supported by the new Local Plan. Changing the focus would undermine the investment plan to regenerate the Pentagon Shopping Centre as a Community Shopping Centre.

There are development opportunities throughout Chatham Town Centre which should be identified within the new Local Plan as part of a Masterplan / investment strategy for the town centre. The Masterplan / investment strategy will assist in defining how Chatham Town Centre can continue to contribute towards meeting a phased plan led need for employment, retail and housing development.



This approach is in accordance with Paragraph: 002 Reference ID: 2b-002-20140306 of the planning practice guidance which states:

"A positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits. Once adopted a Local Plan, including any town centre policy that it contains, will be the starting point for any decisions on individual developments. Local planning authorities should work with the private sector, Portas Pilot organisations, town teams, neighbourhood planning groups, town centre management organisations and other relevant groups when developing such strategies. Non-planning guidance produced by other Government Departments and the sector may be useful in producing such a strategy."

Strategic Issues

Q2. What do you think are the strategic issues the Local Plan needs to address?

Ellandi note the need for the Council to consider the preparation of the Medway Local Plan within the wider context presented by its location within the Thames Gateway growth area and the proximity of London. Accordingly, the Council will need to assess a range of key cross-boundary strategic issues which cover the need to accommodate a significant increase in housing development and make sure that there is sufficient land available to support economic growth at the same time.

Whilst the requirement to meet housing needs over the plan period is an important consideration it far too often becomes the focus of the spatial strategy with other land use strategies given minimal attention. The Council must therefore ensure sufficient assessment of the retail need across the Plan area, taking into account cross-boundary requirements, is also undertaken. Although an assessment to identify capacity for future retail growth within Medway has been carried out as part of the North Kent Strategic Housing and Economic Needs Assessment (SHENA) (March 2015) this will still require a substantial update to the Medway Council Retail Needs Survey which was undertaken in 2009 and is now out of date. Once updated, this information should be used to define an appropriate retail strategy that is cognisant of the quantitative growth in expenditure for Medway along with a qualitative assessment to understand whether meeting all defined expenditure growth is desirable. This research and analysis is critical in forming a sustainable retail strategy for Medway to 2035.

Q3. How should the Council respond to these issues?

In order to respond effectively to the strategic issues which are identified the Council will need to undertake an update to its evidence base. This should not just seek to roll forward capacity figures to set the quantum of floorspace that development management polices will need to accommodate. The requirement for a significant increase in new housing and economic growth will necessarily form the backdrop to assessing both quantitative capacity but also the qualitative need for further retailing within Medway. The Plan must therefore provide a clear strategy as to where and when any further retail development will be accommodated to ensure that the town centres first approach of the National Planning Policy Framework (NPPF) is properly considered and is not undermined by plan led capacity being brought forward in advance of the corresponding population growth envisaged through substantial housing requirements. This should also take account of the potential implications that any expansion of the Bluewater Shopping Centre may have on defined centres within Medway such as Chatham.

Ellandi would specifically highlight the need for:

 A Threshold Policy for Main Town Centre Uses Impact Test – 'Evidence and Justification Assessment' to set out the evidence justifying a lower threshold for impact assessment within the authority compared to the 2,500 sq m limit set out in the NPPF;



- An Investment Strategy for Chatham Town Centre which builds upon work carried out for the emerging 'Chatham Placemaking Masterplan' and seeks to bring together the range of development briefs / frameworks which have been prepared for the Town Centre over the last decade. This should all be translated into the Local Plan; and
- A comprehensive update of the Medway Retail Study, including new household surveys that reflect cross-boundary shopping patterns.

The objectively assessed need for retail / traditional B Class employment and residential growth should be considered as strategic issues within the Plan so that the plan led need is supported by a clear spatial strategy for <u>phased growth</u> over the lifetime of the Plan. This fosters investor confidence and also allows for triggers to be built into the strategy, such as partial review, should any parts of the strategy fail or not deliver as anticipated.

This approach will secure the flexibility that the NPPF calls for over the lifetime of the plan, but ensures that the spatial strategy for growth is only altered through the plan making process where cross-boundary implications are appropriately considered, rather than through ad-hoc updates to evidence outside of the plan process.

Retail, Commercial Leisure & Town Centres

<u>Q25. Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's</u> <u>highest order centre?</u>

It is noted at paragraph 10.8 of the consultation document that whilst Chatham is Medway's highest order centre, it is underperforming against what could be expected for a centre of its size and scale.. To address this Ellandi advocate that any substantial redevelopment opportunities incorporating retail uses should be prioritised within Chatham Town Centre in accordance with its position at the top of the settlement hierarchy. Lower order centres should seek smaller scale improvements that respect their size and function. Any new policy should therefore be clear that scale will be integral to decisions on proposals for new town centre uses and that this will be assessed in relation to the town centre hierarchy.

As stated earlier in this letter, there is a need for the Council to commission a new study to understand potential and future requirements for retail and other town centre uses. The existing retail evidence base is out of date for the purpose of plan making.

Guidance on the preparation of the evidence base to underpin the strategy and development management policies of Local Plans is set out within the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). Paragraph 158 of the NPPF states:

"Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals."

The PPG expands on the above, setting out that evidence needs to inform what is in the plan and <u>should also</u> <u>be kept up-to-date</u>. Moreover, <u>if key studies are already reliant on data that is a few years old, they should be</u> <u>updated to reflect the most recent information available</u> (and, if necessary, the plan adjusted in the light of this information and the comments received at the publication stage) (PPG: Paragraph 014 Reference ID: 12-014-20140306).



It therefore follows that that a revision to the retail and town centre uses evidence base is required to identify the up to date, objectively assessed retail and leisure needs for Medway. The planned retail and leisure needs should then be included within the Local Plan 2012-2035 along with an appropriate strategy for its phased delivery on sustainable town centre sites over the plan period. It may be that the strategy is not to meet all quantitative need as there is sufficient qualitative provision in town centres, including with redevelopment opportunities, not to have to allocate out of centre sites.

Any revision to the retail evidence base should include an updated household survey. This is required because at present the retail study does not take account of on-going alterations to units and occupier line up at Bluewater. Incremental alterations to this regional shopping centre will have altered its level of turnover and influence on trading patterns. As a result, planning applications for retail development that are accompanied by impact assessment work will underestimate potential impacts on Chatham Town Centre.

Notwithstanding the above, longer term capacity for retail floorspace should also be treated with caution. This is because longer term floorspace requirements can be subject to change due to the innovative nature of the retail sector and associated consumer behaviour. This is reinforced by the Government's response to the CLG Select Committee Inquiry into the Operation of the NPPF (February 2015). The paper recommends that Local Authorities review their Local Plans regularly (in whole or part every five years) to ensure that they are up to date. It must therefore follow that if sites are to be allocated to meet the assessed retail need, these sites should be allocated in accordance with the sequential and impact tests (PPG: Paragraph 006 Reference ID: 2b-006-20140306) and subject to phased delivery in line with plan-led need. Any sites allocated in out of centre locations should be identified as reserve sites that might deliver retail development towards the end of the plan period, subject to regular plan led updates of capacity forecasts maintaining that such a need exists.

This approach would accord with the town centre first requirement of the National Planning Policy Framework (NPPF) along with providing flexibility over the longer term to deliver planned retail needs if 1) plan led need exists; and 2) suitable evidence is provided to demonstrate that the town centre allocations cannot be delivered during the remaining lifetime of the plan. The sequential and impact tests would also remain to be passed.

Local Plans that correctly interpret and include the plan making requirements of the NPPF as set out above give confidence to investors to take forward town centre development projects.

<u>Q26.</u> Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?

It is stated at paragraph 10.8 of the consultation document that Chatham currently draws a relatively low proportion of the available expenditure from its local catchment. This scenario has come about as a result of the close proximity of higher order centres such as Bluewater which have a material impact on the ability of Chatham to compete for higher order goods. This highlights the need for Chatham to differentiate its offer by meeting convenience and day to day comparison needs. The Pentagon Centre is well placed to be the focus of such an offer.

Ellandi is supportive of any aspiration which seeks to improve Chatham's market share, however we would note that this is not only to be achieved through a quantitative increase in floorspace but also through qualitative improvements to existing floorspace provision. Sufficient time should be afforded for this to take place.

In advance of identifying an appropriate strategy to address Chatham's low market share it is first necessary to establish an accurate baseline position. This will require the commissioning and preparation of an up to date Retail Study which allows for the assessment of both quantitative capacity and qualitative need for further retailing and leisure uses across the Borough. This will enable the Council to identify a clear strategy as to where and when any further retail and / or leisure development will be accommodated.



In respect of meeting capacity, NPPF paragraph 23 identifies that it is important that needs for retail, leisure, office and other town centre uses are met in full and are not compromised by limited site availability. However, this must be considered within the context of the settlement hierarchy relevant to the Local Plan area (NPPG Paragraph 3) and where within that hierarchy it is most sustainable to meet that need without compromising the vitality and viability of existing town centres. This puts further onus on the Council to assess sub-regional retailing and leisure requirements and how this impacts upon the overarching retail strategy for Medway. Without this there is substantial risk of development being pursued in out of town locations at a scale that is wholly inappropriate for the settlement it is attached to.

Longer range forecasts should be treated with caution and therefore planning to meet needs in full over the lifetime of the plan should be critically assessed against the implications for the vitality and viability of town centres including identifying timescales for when further retail development may be required. The Council should review its retail evidence base in full at the earliest opportunity so that it can devise an appropriate strategy for its phased delivery on sustainable town centre sites or through store efficiency gains over the plan period.

In summary, the Local Plan is the opportunity for objectively assessed development requirements to be tested and spatially planned, which includes identifying appropriate growth for different centres. This must be undertaken with full consideration of each centres role within the retail hierarchy, the market implications of diverting retail growth to alternative centres and the infrastructure requirements that would be required. Without doing this then the plan cannot be effective.

<u>Q27. What should the mix be in Medway's town centres between retail and other supporting uses, including</u> food and drink, commercial leisure, employment and residential?

The principle of maintaining a focus on A1 retail floorspace within Chatham Town Centre is supported by Ellandi. However, it is stressed that whilst the Council should seek to manage the loss of A1 retail floorspace within the Primary Shopping Area, the wording of any policy should not be overly restrictive and ignore national guidance on the need to adopt a flexible approach to the future role of town centres. This approach is set out by the NPPF at paragraph 23 where it is stated that Local Planning Authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. The NPPF defines suitable 'main town centre uses' as retail, leisure, entertainment facilities, which includes restaurants and bars, and offices. This recognises that retail forms only one part of the experience for visitors to a town centre; it is equally about gaining access to people driven services, eating out, meeting with friends and having an opportunity to socialise. Accordingly, the emerging Local Plan should recognise that customers expect more from their shopping experiences and there is pressure on shopping centre owners, managers and tenants to respond to this.

The NPPF also attaches significant weight to supporting economic growth through the planning system, noting that investment should not be overburdened by the combined requirements of planning policy expectations and that centres should be resilient to anticipated future economic changes. The ability to undertake a balanced consideration of complementary town centre uses at the time they are proposed, where this does not undermine the predominance of A1 retail, is the preferred approach of the NPPF to securing the vitality and viability of town centres.

Bullet 3 of NPPF Paragraph 23 requires Local Plan policy to: "define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations." To accord with national policy, the Local Plan should include a plan for each of the designated centres that clearly identifies primary and secondary shopping frontages. A number of recent local plans have failed to grapple sufficiently with this issue causing delays to their adoption. Policy should not be overly prescriptive in terms of setting a specific percentage or number of contiguous non-A1 uses that are permissible. Rather it should look to place the onus on the Applicant to demonstrate how a non-A1 use would secure the vitality and viability of the primary shopping area as a whole and, if the proposal is within the primary shopping frontage, whether the proposal would undermine the overall predominance of A1 retailing.



<u>Q28.Should we consider making provision for a new or replacement supermarket in Gillingham town centre?</u> <u>If so, where should this go?</u>

Ellandi would support the provision of retail floorspace within Gillingham (or any other centre within the authority) which is appropriate to its scale and role within Medway. Furthermore, any perceived capacity for new convenience or comparison goods floorspace within Medway should respect the settlement hierarchy with Chatham being the focus for substantial Town Centre improvements. Lower order centres should consolidate their role in the hierarchy by providing local convenience and specialist comparison goods.

Q29. What should our approach be to proposals for new or enhanced out of town retail?

The Council should develop policy that supports and enhances the vitality and viability of defined centres within Medway. Accordingly, these should be the preferred location for retail (food and non-food), office, leisure and cultural facilities.

Any alternative to this approach which gives out of centre sites greater status in the hierarchy to increase their sequential preference is contrary to the principles of the NPPF and could not only harm Chatham Town Centre but also the vitality and viability of Medway's network of centres. It is noted at paragraph 10.11 that Hempstead Valley is classified as a District Centre, however it is clear that this functions in a manner more akin to a destination of greater scale and offer. Incremental improvements to this facility have impacted upon higher order centres such as Chatham. For instance Marks and Spencer closed its store in Chatham High Street but is represented at Hempstead Valley. This adverse impact is further heightened by the fact Bluewater being located in close proximity to Chatham. The introduction of new or enhanced out of centre retail floorspace would see Chatham's market share deteriorate further.

In order to accord with the provisions of the NPPF the Council should:

- set out a Town Centre first approach for the location of town centre uses across Medway;
- set out a hierarchy of retail centres, comprising town, district and local retail centres;
- define town centre boundaries, primary shopping areas and secondary shopping streets where applicable;
- set out policy to resist further significant out of town retail development in order to support bringing forward retail led regeneration within Chatham Town Centre;
- set a floor space threshold for when an Impact Assessment is required for edge of and out of centre retail and leisure proposals, reflecting the roles of different centres; and
- seek to ensure that the role of Chatham Town centre as a retail destination is enhanced by directing retail, leisure, tourism and cultural development to the town centre, enabling it to offer a vibrant, vital and distinctive experience.

With respect to the town centres first approach, it is noted that the anticipated timing of the substantial growth in Medway will influence the phasing for when and where the Local Plan seeks to deliver plan led retail need and the preferred strategy for doing this. These considerations will in turn influence how the sequential and impact tests within the NPPF are interpreted and drafted within the new Local Plan. The NPPF requires plan led need to be met in full and therefore the Local Plan must grapple with how to do this in the most sustainable manner that supports the overall vision for Medway. It should be noted that quantitative retail need, whilst an important factor, forms only part of the Council's approach to defining a retail strategy for the Borough.

This is because, as clearly stated in the PPG (Paragraph: 003 Reference ID: 2a-003-20140306) "the need for all land uses should address both the [...] quantity of economic development floorspace needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment". This means that whilst there is an onus on local authorities to understand from a purely quantitative stand point the amount of expenditure capacity that exists across the Plan period (which can be converted into a floorspace requirement), this must be set against a consideration of the qualitative issues.



For example, expenditure calculations may suggest a level of capacity over the Plan period that would require a significant amount of out of centre floorspace to be delivered across the retail hierarchy. However, following a review the qualitative offer of the hierarchy, it may become apparent that a certain market segment (e.g. clothes and footwear) is already well catered for and in fact there is no need to deliver the level of floorspace identified by the quantitative assessment. Or alternatively, there are a high number of vacancies in a certain centre that need to be addressed before expansion is considered.

This would in turn inform a decision to reduce the amount of retail floorspace that is required to be delivered over the Plan period and instead allow authorities to focus on producing effective town centre strategies which seek to address qualitative deficiencies within their areas including tackling addressing vacancies, improving public realm, encouraging new entrants, site assembly for in-centre redevelopment and implementing a place marketing strategy to entice more visitors.

Successfully delivering a town centre first approach will require policies for development management that are adapted to reflect and support local circumstances. The new Local Plan should not simply 'cut and paste' the sequential and impact tests from the NPPF but instead consider when and where need / capacity is likely to arise. This is to avoid the unintended consequences of an applicant seeking to deliver all of the floorspace at the start of the Plan period without supporting retail expenditure being available. It would be beneficial to define what the Council considers to be the appropriate scale and form of development for each of the town and local centres within Medway. This will need to be determined by updated retail assessment work to identify any existing gaps in provision for each of the centres and therefore the scale and type of retailing required to support a sustainable future for the centres. The provision would also then allow capacity figures as informed by qualitative assessment to be set that are relevant to each centre and in turn the phasing requirements for delivering that capacity.

The phasing of capacity will be strongly influenced by housing growth and the location of this growth, therefore policy should ensure that new retailing is generally phased in line with housing growth. This should not restrict town centre sites, as allocated in the Local Plan, from coming forward in advance of plan led capacity being available.

In addition, the Council should undertake an assessment of thresholds to identify a locally set threshold or thresholds over which impact assessment will be required for main town centre uses (office, leisure, retail etc). The NPPF threshold of 2,500 sq m is too high, particularly in areas where town centres are vulnerable and even a small out of centre scheme could have a disproportionate effect on the vitality and viability of the centre. Our experience of the NPPF threshold is that developers of out of centre proposals increasingly size a scheme just under the NPPF threshold on the basis of there not being a unit available within a town centre location that meets all of the operational requirements of an occupier. This then allows them to circumvent the requirement to assess the proposals against the impact test - the NPPF is clear that this is only required over the nationally set threshold or where a locally set threshold, based on robust evidence, is set. We would therefore strongly recommend that research led by Medway Council is undertaken to assess where the current balance of unit sizes lies in each of the Borough's town, district and local centres. A suitable threshold or thresholds can then be set which supports the spatial strategy for the Plan.

Development Strategy

<u>Q86.</u> What approach should be taken to future development opportunities and mix of uses in Chatham Town <u>Centre and Waterfront?</u>

Ellandi fully endorse a strategy which seeks to focus development within Chatham Town Centre and the Waterfront. The Council proposes three options for enhancing the town centre, namely (1) delivering additional residential redevelopment and retail floorspace; (2) delivering additional employment floorspace and residential development to support existing retail floorspace; and (3) maximising additional residential development and allowing for a controlled reduction in retail floorspace.



<u>Q87. Do you agree that the other town centres require improvement in their existing roles, or should we</u> consider holistic review of any of them in conjunction with nearby waterfront regeneration sites?

Ellandi would support the improvement of other town centres within Medway subject to this being appropriate to their scale and role within the hierarchy. Accordingly, this should respect the fact that Chatham is the principal centre within the authority and should be the main focus of new retail floorspace.

A holistic review of the retail and leisure strategy is required as stated throughout this letter.

Summary

Having reviewed the Medway Local Plan Issues and Options 2012-2035 Ellandi is broadly supportive of the suggestions proposed, but await clarification on the hierarchy of centres, definitions of the role and function of town and district centres and, to that end, specific policies relating to town and district centres.

The council should update the Medway Retail Study to identify quantitative and qualitative retail and leisure needs as informed by a new shopper survey. Work should also be undertaken on developing deliverable town centre strategies that focus on addressing the structural changes of the centres (where these are apparent). The resultant strategies should be included within the emerging plan.

On behalf our client, we request that we are kept up to date on the progress of the Medway Council Local Plan.

We trust that these comments are helpful, and would be happy to discuss any of the issues raised in more detail.

Yours faithfully



Matthew Williams Director

Name: Allister Hume

Reference 165

Organisation Hume Planning

On Behalf Of The Attwood Family

Type of Consultee

Developer/Consultant



Medway Issues and Options 2012-2035

Response of the Attwood Family

Prepared by Hume Planning Consultancy Ltd with Graham Warren

Date February 2016

MEDWAY ISSUES AND OPTIONS

1 Introduction

- 1.1 The Objectively Assessed Housing Need minimum target of 29,463 dwellings is supported which equates to an average of up to 1281 dwellings per annum. Medway Council's recognition that this OAN housing target will place great development pressure on Medway Council and that a full range of options must be examined in this fresh context is welcomed.
- 1.2 The Issues and Options document recognises that Medway comprises a built up area which is concentrated between the River Medway and the North Downs with an extensive rural area lying to the north of the river and this forms part of the character of Medway. The protection of the environment and the focus of growth upon opportunities in the urban area is strongly supported by the Attwood Family as a guiding principle for the future spatial strategy of the plan. This approach will serve to both protect Medway's best natural environment and safeguard the rural character of Medway to the north of the river whilst also supporting the wider objectives of the plan to develop tourism.
- 1.3 The Issues and Options Report also recognises the deprivation and areas of disadvantage which are concentrated in the urban areas of Chatham and Gillingham. It is asserted that growth in the rural parts of Medway will not address these inequalities and a shift in thinking by policy makers is required focusing on the "opportunity areas" in or closer to the urban areas.
- 1.4 Medway is subject to out commuting to the main destinations of Maidstone, Tonbridge and London. Accommodating development pressure close to public transport nodes and routes that connect with these destinations advances the case for development to be sited close to the urban area, public transport and motorway linkages. Such a spatial approach is also consistent with the location of Medway within the Thames Gateway growth area.
- 1.5 The Report recognises the increasing ageing population in Medway with population projections suggesting that the over 65's in Medway will increase by 55% over the plan period (40,500 in 2013 to 67,800 by 2035). There is also the need for more affordable housing and a recognition of the economic inequalities across Medway.
- 1.6 Older people will be more reliant on services that are accessible to them including health provision and those in housing need equally should be housed close to employment opportunities and services and facilities. A focus on the most accessible sites close to the urban areas is also warranted on this basis.
- 1.7 The Issues and Option Paper also recognises that provision for "starter homes" is unlikely to deliver the same infrastructure and services. This is a factor that should also influence the locational choice of future housing so that housing development is sited in the most accessible locations closest to the urban areas. These factors strongly favour a spatial approach which focuses development at the edges of the urban area.

- 1.8 Accessibility to the strategic road and public transport network is equally important for future employment land provision to meet the future development needs of Medway. There are opportunity areas close to the motorway within existing breaks between settlements that are capable of providing quality employment and office uses close to the motorway network.
- 1.9 Focusing development close to Hempstead Valley Shopping Centre through a comprehensively planned land use proposal which could also improve road connectivity is also a benefit of development in this location.
- 1.10 The Issues and Options paper recognises that "securing an effective green infrastructure network through new development will be critical to planning a sustainable future for Medway." This can also be achieved through a comprehensively planned mixed use land proposal.

2 Options for Growth

- 2.1 As highlighted in the Development Strategy of the Issues and Options Paper, the development pressures on Medway to meet the OAN target require previous assumptions to be re-evaluated. The recognition that the role of Lodge Hill as part of the spatial strategy must be revisited is welcomed.
- 2.2 It is considered that the spatial options of new settlements "or garden villages" and a strategy focused on the Hoo Peninsula should be considered after the focus on urban extension opportunities (which will deliver greater sustainability benefits) has been exhausted.

Urban Extension at the Capstone Valley

- 2.3 In referring to the land separating the existing urban areas the Issues and Options Report suggests that "Development in any of these locations would erode or largely remove strategic green buffers and could cause coalescence of existing settlements and communities" Page 72.
- 2.4 Land at Capstone Valley offers the opportunity for quality place making to accommodate in a sustainable way the development pressures of Medway over the plan period.
- 2.5 The Attwood family have a unique ability through their land ownership to provide a deliverable and comprehensively planned extension to the urban area.
- 2.6 Key geographical and sustainable advantages of this land include;-
 - Is immediately adjacent to the urban area and existing services and facilities at Lordswood and Hempstead;

- Adjoins the Capstone County Park;
- Close to Gillingham Business Park and Medway Maritime Hospital;
- Sited close to the Park and Ride facility and public transport;
- Adjoins the motorway network;
- Adjoins the district retail centre of Hempstead Valley
- 2.7 Landscape evidence prepared by EDP and previously forwarded to the local plan process in response to the "call for sites" exercise identified that the landscape impact could be mitigated in this area. Historically this land has been perceived as an important buffer which prevents the coalescence of Lordswood and Hempstead. It is important in the context of the development pressure placed on Medway by the OAN housing target that all development options are reconsidered and past assumptions about potential directions of growth properly re-evaluated.
- 2.8 Through the Attwood family's extensive ownership, it is considered that separation at the urban edge can be maintained through
 - An enlargement of the Capstone Country Park, which is sited within the central area, creating an improved central park for the benefit of the wider community;
 - Amalgamation of the existing areas of woodland within the landholding to create a green infrastructure corridor.
 - Enhancement of the hedgerow network and tree coverage in parts of the site to preclude the sense of separation.
 - The sensitive siting of development within this area working with the topography and incorporating the provision of a number of strategic landscaped areas.

3 <u>Sustainability Benefits of Land at Capstone Valley</u>

- 3.1 As part of the emerging local plan process a number of different masterplanned options relating to different parts of the landholding and differing scales of growth will be presented to Medway Council. At this stage geographically a number of advantages of this site are highlighted which emphasise the unique accessibility of this option including;
 - Proximity to the district centre of Hempstead Valley Shopping Centre (retail)
 - Well located to Medway Maritime Hospital (health);

- In close proximity to Gillingham Business Park and with land adjoining the motorway network offers the potential for well sited employment and business land within the potential development area to meet Medway's development requirements (employment)
- Sited close to a Park and Ride facility and offers the potential for significant improvements to public transport connectivity with the central urban areas and also with the district centre at Hempstead Valley through the connection provided to existing local services (transport)
- The site offers an extension to the country park that will increase open space provision in the central area of the corridor which will safeguard this land as a buffer (recreation/open space)
- The comprehensive solution to the site offers the potential for a transport link between North Danes Way and Hempstead Shopping Centre (transport)
- The comprehensive planning land use solution would also allow cycle and footpath connectivity to be enhanced (cycleway/footpath)
- Linkages of the existing woodland blocks and open space within the corridor to create enhanced green network (nature conservation)
- The ability to deliver a mixed use proposal of employment, open space, residential, and community infrastructure including education facilities (education/mix of Community Uses)

4 <u>Summary</u>

- 4.1 A range of sites have separately been presented to Medway Council which warrant individual consideration within the larger land corridor. Collectively, these land parcels offer a comprehensive mixed use land solution that could deliver significant land use benefits whilst still maintaining a sense of separation between Hempstead and Lordswood.
- 4.2 The scale of development pressure to be met as part of this local plan process necessitates Medway Council must reassess previous historical assumptions about this corridor and to look creatively at a permanent solution for this area.
- 4.3 Masterplanning options are currently being prepared to demonstrate how perceptions of coalescence can be avoided whilst delivering creative land use benefits in what has been shown to be a highly sustainable location.

4.4 Such a spatial approach to focus growth close to the urban area where it is most likely to help regenerate these areas, will also serve to safeguard the rural character of Medway to the north of the river. The advantages of this opportunity warrant being examined carefully and objectively as part of this local plan process without the prejudice of past assumptions about this development option which have been taken in a different planning context.
Name: Robert Deanwood

Reference 166

Organisation Amec Foster Wheeler

On Behalf Of

National Grid

Type of Consultee

Developer/Consultant



Planning Policy Regeneration, Community and Culture, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR



Robert Deanwood Consultant Town Planner

n.grid@amecfw.com

Sent by email to: planning.policy@medway.gov.uk

28 January 2016

Dear Sir / Madam

Medway Council: Local Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood Consultant Town Planner

n.grid@amecfw.com

Amec Foster Wheeler E&I UK Gables House Kenilworth Road Leamington Spa CV32 6JX

Yours faithfully

[via email] Robert Deanwood Consultant Town Planner

cc. Ann Holdsworth, National Grid

Gables House Kenilworth Road Leamington Spa Warwickshire CV32 6JX United Kingdom

amecfw.com

Amec Foster Wheeler Environment & Infrastructure UK Limited Registered office: Booths Park, Chelford Road, Knutsford, Cheshire WA16 8QZ Registered in England. No. 2190074

Ann Holdsworth

National Grid House

Gallows Hill Warwick

CV34 6DA

Warwick Technology Park

Development Liaison Officer, National Grid



Name: Peter Court

Reference 167

Organisation Peter Court Associates

On Behalf Of Port Medway Marina Ltd

Type of Consultee

Developer/Consultant



info@petercourtassociates.co.uk www.petercourtassociates.co.uk

Planning Policy Regeneration, Community & Culture, Medway Council, Gum Wharf, Dock Road, Chatham, Kent. ME4 4TR.

22nd February 2016 My reference: PCA/2011-21

Dear Sirs,

Response to issues and Options Consultation Document

These representations are submitted on behalf of Messrs. David and Neil Taylor, who own Port Medway Marina at Cuxton. The Marina itself comprises some 11 ha of riverside, while the river frontage itself is over 1000 metres. It is situated on the north western bank of the River Medway, south west of the Channel Tunnel rail Link and M2 motorway bridges, and is accessed from the A228 via Station Road. The railway line from Strood to Paddock Wood lies on the western boundary. The Marina is an important employer, which currently provides jobs for 35 people. However, it also adds an extra dimension to the wider economy through the multiplier effect relating to businesses that supply the Company and in terms of bringing business into the area through it being a visitor attraction.

The owners of Port Medway Marina have worked with the Council over a considerable period of time and therefore welcome the Council's proposal to consult on its plans that will address a range of key issues over the period up to 2035. They have carefully considered the matters that affect them in the Issues and Options Consultation Document and their comments on these are set out below.



The Vision for Medway

The Council needs to understand the need to stimulate the local economy and provide the dwellings that are needed. It has failed to do this in the past, so now it has the opportunity to make a fresh start. Its indigenous industry provides the basis for doing this, so the Council really needs to listen to what existing companies have in the way of their own plans for development – and then help those companies achieve those aims. If the Council does not do this, the local economy will suffer. This will inevitably involve taking a fresh look at existing policies, many of which need to be reviewed. Nevertheless, that is all part of the plan-making process.

The Council must therefore decide whether they want Medway to be an attractive place for people to live and work, or whether pressures for development should continue to be resisted, to the detriment of the authority. Its last two attempts at plan – making opted for the latter approach. It is now time, therefore, to adopt a different stance.

The Strategic Issues

The Strategic Issues comprise the provision of jobs and dwellings in order to meet the needs of the people of Medway. At the same time the Council needs to protect those areas that warrant protection. However, this does not mean simply giving in to all those people and organisations who believe that development is a dirty word. A strong economy can provide strong environmental protection. However, without adequate homes and jobs, both the economy and the environment suffer.

The Council therefore needs to respond to this by deciding where and how its requirements should be met – and not whether or not it should meet them. That has been its failure in the past.

<u>Housing</u>

Q.4. The Council was right in undertaking an objective assessment of its housing needs. Indeed, it was required to do this under government policy as set out in the National Planning Policy Framework. It must therefore resist the siren calls of those who already have their own houses and who do not appreciate that housing is a fundamental requirement.

Q.6. 25% appears to be a reasonable level of requirement for affordable housing. However, the Council should not set too low a threshold for this otherwise it will stifle development on many small sites. Furthermore, the 25% should be gradually brought in – like the government has now (belatedly) decided to do with stamp duty – rather than imposed, since this will simply lead to development up to the threshold.

The Council should, moreover, take account of the costs of development, the viability of sites – especially those where development costs are high-and whether other community benefits are also being provided. Unfortunately, many local authorities simply see the provision of affordable housing as a tax. That is completely the wrong approach.

Q.9. A home is a fundamental requirement. It provides stability. Without sufficient housing, all manner of physical and social ills can affect people. The provision of new housing also leads to improvements in the environment, better local facilities and provides improved job prospects – not just in the construction of dwellings, but also for those people that live in the new houses.

Q.10. My clients have land at Port Medway Marina which they would like to see developed for housing. They would therefore welcome the opportunity to discuss with council officers the type and quantum of that housing, along with other related issues.

Q.11. Yes: these cannot be ignored.

Q.12. The Council needs to discuss these mattes with individual landowners who wish to promote their sites. A formal "call for sites" would therefore be appropriate.

The Economy

Q.15. The Council really needs to include employment land uses in its "call for sites". My clients wish to undertake employment/economic development on land at Port Medway Marina and would welcome the opportunity to discuss this with council officers.

The Council should not rely, as it has in the past, of Lodge Hill coming forward. Whilst it is clear that the Council wants this site to be developed, it should not – again as it has in the past – resist

other sites coming forward. That would be a fatal mistake and result in planning by appeal. Instead, the Council must learn to accept constraints, rather than waste huge sums of money in trying to get its own way.

Q.17. The forecasts of jobs and employment land appear reasonable. However, the Council must let development take place on sites proposed by landowners. For too long the Council has taken the stance that it has most of the land it needs for employment out on the Isle of Grain. How it is clear that there is little demand from employers to go there. If appropriate sites are not released at other locations, then employers will seek opportunities elsewhere – and the economy will suffer.

This very point was made at the last two Local Plan/Core Strategy Examinations. Hopefully, the Council will now need the reasons why Inspectors found those plans unsound.

Q.18. The simple answer is that it should provide the land needed for houses and jobs. Otherwise, it will lose out and its economy will suffer.

Q.21 It first has to be said that the recognition of this issue by the council is most welcome.

Q.22 The Council has failed in the past to consider the needs and aspirations of the owners of wharves and those who wish to use the River Medway. As my clients own Port Medway Marina and have worked with the Council to improve and develop the site, they are more than willing to meet with Council officers to discuss issues of mutual inters.

<u>Tourism</u>

Tourism is a most important element in the economy of Medway. My clients have particular interests in this, given the nature of their business. The wharves and marinas along the River Medway are very much forgotten or ignored assets in terms of the tourist industry. My clients would again be pleased to meet officers of the council in order to explain how they could work with the Council in order to help it enhance the tourist industry within the authority.

<u>Retail</u>

Q.29 The Council needs to acknowledge that there are other locations within the authority where small scale retail development would be appropriate –particularly in support of the tourism and employment sectors. Again. This matter should be included in a "call for sites".

Rural Issues

Q.39 It is important for the Council to consider the provision of employment opportunities in the more rural parts of Medway. Indeed, the creation and stimulation of these on a range of sites will improve the local economy and lead to social and environmental improvements as well.

My client is considering proposals of this nature and would be pleased to discuss them in more detail with council officers. Nevertheless, it is pleasing to see that this matter has been recognised as something that needs to be addressed.

Q.40 and 41. The Council needs to discuss these matters with landowners and parish councils, since they are the individuals and groups that can identify problems and the opportunities to address them. Indeed, landowners can play a major role in resolving problems through the delivery of both jobs and contributions towards local infrastructure and facilities.

Social and Community Infrastructure

Q.48. As stated in response to Q.40 and 41, these are matters that will emerge from discussions with landowners and parish councils. The Council may, therefore, wish to consider some form of public engagement – such as a series of meetings at which they can listen to what local people believe is needed.

Open Space

Q.49-53 It is important for the Council to provide access to open space. Moreover, new development could provide, in appropriate circumstances, open space or contributions towards the acquisition of new sites or improvements to existing ones.

Flood Risk

Q.66 It is important for the Council to work closely with landowners in order to understand the likelihood of flooding on specific sites and to ensure that development can reasonably take place. The Council should not take a dogmatic stance, since that could result in opportunities for landowners to provide jobs, housing and other community facilities being lost. The onus therefore has to be on landowners to submit Flood Risk Assessments in support of development proposals where appropriate and to discuss the findings with the Council.

Transport

Q.72 It is important for the Council to consider development opportunities on land adjacent to railway stations. There are numerous examples throughout the region of where development has been restricted around transport nodes in order to protect the environment. Now, however, and given the emphasis on sustainable development, there is a need for all local authorities to take a fresh look at making the best use of existing transport facilities.

My client owns land immediately adjacent to Cuxton railway station and is considering proposals for a limited amount of residential and employment development. The proximity of the railway station is therefore a most important consideration in this respect.

Q.74 The recognition of marinas and other forms of waterside infrastructure is most welcome. My clients own Port Medway Marina and are currently preparing a revised Masterplan for the use of their land. Furthermore, it is their intention to then seek a pre-application meeting with the Council to discuss their proposals in more detail. Nevertheless, they also believe that these can be promoted through the local plan process and therefore welcome the opportunity to comment on this Issues and Options document. This is particularly so in the light of the Council's failure in the past to fully consider the River Medway as an entity and address the needs of those whose livelihoods depend on their ability to use it for a variety of purposes.

Deliverability

Q.76 In order to achieve this, the Council needs to produce realistic policies, based on discussions with landowners. In particular, the Council needs to understand the key issue of viability, since development will only proceed on this basis. All too often in the past, Councils throughout the

country have ignored this matter and sought to impose costs and requirements on landowners without giving due consideration as to whether the development will remain viable.

Q.77 Yes: it is good to see that the Council has recognised this issue. It is most important that policies in the local plan reflect this. The acknowledgement, in paragraph 26.10 of the costs of decontamination and flood defence is most welcome since it is highly relevant to my clients. They would therefore be pleased to discuss this in more detail with the Council when they seek their pre-application meeting.

Development Strategy

The Council's fresh approach to the production of a local plan is most welcome, especially in light of its failures in the recent past. This is a difficult task, but it has made a good start with the research undertaken to date, and then with the subsequent publication of this Issues and Options report. It is vital for the well-being of Medway that the Council meets its housing, employment and other land use requirements and does not succumb to pressure from those who want development to be limited to what they consider to be the "environmental capacity" of the area.

Medway is geographically a large local authority. It therefore has the capacity to meet its requirements in a range of different ways. While the focus of development will be on the main towns, the capacity of smaller settlements, such as Cuxton, should not be ignored. This is particularly important, given the ability of sites such as that owned by my clients, to deliver housing, employment and environmental improvements quickly A flexible approach, depending on its nature and location, therefore needs to be adopted by the Council.

Its next step is, therefore, to issue a "call for sites" in order to see what opportunities exist and to then evaluate them. This will then lead to the consideration of spatial and other policies in a draft local plan.

I hope that these comments are helpful. It is certainly the intention of my clients to work closely with the Council regarding the delivery of development at Port Medway Marina. As stated above, a new Masterplan for the site is being prepared, and it is the Company's intention to seek a pre-application meeting with the Council to discuss their proposals in more detail. Nevertheless, at this

les and Options document. If, tate to contact me.



Peter Court Director

enc

- Messrs. David and Neil Taylor, Port Medway Marina Tom LaDell and Lydia Hill-Wood, LaDell Wood СС
- СС

Name: Carrie Bowes

Reference 168

Organisation

Medway Green Party

On Behalf Of

Type of Consultee

Councillor/MP/Parish Council

Medway Green Party

Response to Medway Council Local Plan Consultation

Dear Planning Department,

Medway Green Party welcome Medway Council's attempt to engage the local community in discussions of the future of the Medway area (though many of the questions posed required specialist knowledge).

Medway Green Party members have opted to jointly respond to sections of the Medway Council Local Plan Issues and Options document. These represent our initial comments, in what we hope will be an ongoing contribution to the consultation process. Due to time constraints, we were unable to comment on all the sections and issues raised, but hope this will represent a good start to our contribution.

Introduction

We believe that the primary objective of the Local Plan should be to meet the needs of the local population, while at the same time protecting our rich local natural environment. Alongside this, we must take active steps (action that must happen in every Local Authority) to combat climate change. A joined up solution which places environmental protection at its core would improve the local economy by providing training and jobs in:

- Renewable technologies
- Providing efficient new housing
- Transforming the existing housing stock
- Growth in local independent businesses, and other community based organisations, e.g. cooperatives/social enterprises

It would improve the health and wellbeing of the population by:

- Enhancing provision of cycling and pedestrian routes
- Providing better access to green spaces
- Ensuring that amenities are available within walking distance or that public transport links are available and affordable
- This would in turn help to cut down on car travel and the resulting congestion and air pollution

Finally the plan should seek to empower the local population, by encouraging and supporting community co-production and ownership in co-operative housing projects and renewable energy production. The Town and Country Planning Act focuses on determining the appropriate use of land, protection of the environment and conservation of scarce

resources.

'Planning' is the 'application of common sense for the common good'. As such it calls on an understanding of a vast array of scientific, technological and other disciplines to guide decision making within the broad philosophical framework of Plato's 'Republic'.

The Green Party's interpretation of the 'common good' includes the well being of generations yet unborn and opposes decisions made for short term economic or political gain.

All too often, growth in the economy is implicitly the primary focus, with other needs being compromised to this end. However without a planet which is fit to live on there can be no

economy. This focus needs to be turned on its head; the challenge of meeting the needs of a growing population need to be worked out within the context of responding to the environmental crises or serious steps are unlikely to be taken. The need to protect and enhance the natural environment (to truly be sustainable) must not be left as a small part of a bigger framework, as is the case in the section (in the consultation document) on sustainable development – where it, in effect, represents a sixth of the sustainable development framework. A framework which instead makes environmental protection the central focus means that all options will need to be considered within this primary objective. This means that different options will need to be looked at, including innovative solutions that may seem unusual at first look in some cases. However, the consultation document does essentially contain many of the elements that could make this vision possible. At the same time it misses elements; both in identifying economic opportunities in our need to protect our environment and failing to note that decisions taken locally can be themselves a driver of population growth in the area.

Background

The Medway Council area consists of a combination of diverse topographical and geological elements within North Kent.

Approximately 20% of the Medway Council area is occupied by the water of the River Medway and the margins of the River Thames.

The remaining land areas are divided fairly evenly between the fertile flat land of the Hoo Pennisula, to the north, with its underlying clay geology and the hilly chalk pasture land of the North Kent Downs to the south.

Much of the hilly, lower value farmland of the Downs has been built over and the remaining undeveloped areas are used for recreation.

The Hoo Pennisula, despite its rich arable land, has suffered from ill considered planning decisions in the past and now has large areas of polluted land and development inappropriate to the 21st Century.

A large portion of the current housing stock in Medway dates back to Victorian times; built after the 'great fire of Chatham' and consists of workers' houses associated with the Dockyard and facilities related to the military presence in the area.

Much of the existing housing stock is of poor quality, cramped and expensive to heat and light.

Population Increase

In the Executive Summary the forecast for Housing Need in Medway mysteriously translates the projected growth in population into a requirement for 29,463 dwellings.

The consultation document informs us, in the Context Section, that the population estimate for Medway in mid 2014 was 274,015 people.

In the Executive Summary we are informed that by 2035 the population of Medway is estimated to be 322,700 people.

This is an increase of 48,685 people or 17.76% over the 2014 estimate.

During the local plan's lifetime this probably amounts to a year on year growth of approximately 0.75% in numbers of people in Medway.

For the first year we would therefore need to accommodate an extra 2,055 people. This means that 2,055 people would need a home.

However, people are most commonly born into a shared home environment and at various stages in life choose to live alone or share with others. Future homes provided in Medway need to be of better quality, generous in size and efficient at conserving energy.

Housing: Identifying need

Without much more detail than is offered in the consultation document, it isn't clear what the range of types of home will be needed. However, it is our opinion that many recent developments in Medway do not respond to local need; for instance the Redrow development in Halling¹ where houses currently for sale are at prices of over £400,000. It is also notable that, according to the North Kent Strategic Housing and Economic Needs Assessment² (used as a basis for predicted housing needs in the consultation document) there has been a stark rise in inward domestic migration from neighbouring towns and South East London, in the last four to five years,

whereas, before this, the net direction had been outward. Could it be that this is a direct response to the building of new developments that are too costly for the local population?

Being as land is in such short supply, and we expect a rise in natural population growth, it would seem prudent to aim the housing provision (with some exceptions e.g. health or social care reasons, refugee status etc) at those who already live in the Medway Towns or work here. We will never meet the housing needs of the local population if we allow our valuable land to go to building executive homes that the majority of the local population cannot afford.

Thus it must be taken into account that using absolute figures is a limited way of representing the requirement for homes. Shortages are not simply a result of population figures outweighing numbers of homes available, but other factors, such as income inequality, play a part and must be taken into full consideration when planning future allocations. This is also reflected in the existence of under occupancy alongside over crowdedness³.

Furthermore, in the last Housing Summary Measures Analysis report by The Office for National Statistics

Inequality in size of home

"Between 1991 and 2011, four million extra homes were built in the UK. Unfortunately, 36% of new rooms went to the 10% of the population who were already the most generously housed (i.e. those who already had the most rooms). On the other end of the spectrum, the least generously housed 10% of the population (those with the least rooms per person) gained no extra rooms at all.

It's worth pausing on this fact: **An extra four million homes did nothing to increase space for those most in need".** [3]

(August 2015), Medway featured as having the biggest shortfall in social housing in the country⁴. A clear objective therefore must be to focus on putting this right; to address this shortfall (and predicted need over the plan period).

At a national level it would make sense if opportunities and growth were spread more evenly around the country, so as not to put too much strain on the South East. This is something our

¹ https://www.redrow.co.uk/developments/st-andrews-park-halling

² http://www.medway.gov.uk/pdf/North%20Kent%20SHENA%20Baseline%20report.pdf

³ http://www.neweconomics.org/blog/entry/inequality-is-at-the-heart-of-our-housing-crisis

http://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/housingsummarymeasuresanalysis/ 2015-08-05#social-housing-shortfall

national government should be working on. Medway Local Authority may be able to work at this at a regional level, not to build new tunnels, airports and massive infrastructure projects, but to explore ways in which the challenges of a rising population, growing inequality and environmental crises can be met, without destroying what is good about each area.

An additional issue is that that more than half of the predicted growth is a result of people living longer and thus the population aging. It would therefore seem sensible that a large part of any future housing development should be designed to meet the potential needs of older people in our population. The precise details of these requirements should be decided in consultation with older people's groups, and by reference to demographic information. It has been noted that Montgomery Court in Wainscott⁵ is seen as very attractive to older people in the community, and similar models may be worth considering when planning future need.

It may also be possible to explore ways of enabling older people to divide their properties into smaller units. This may be beneficial to people who find themselves in the position that, while they do not want to move into a different area, they nevertheless find themselves burdened by properties which are too large for their needs or their ability to maintain. This would also have the benefit of reducing under occupancy and providing an increased stock of housing without the need for additional land.

Medway Local Authority could also address under-occupation through encouraging mutual exchange of homes, helping to match people who want to downsize with those who need more space, and providing more homes suitable for people to downsize into, such as smaller social rented homes for older people. The Green Party do not support punitive or coercive measures such as "the bedroom tax". Encouragement to downsize should take place in a supportive environment that is sensitive to the needs of individuals.

The use of existing housing, as an alternative to purpose built "retirement homes", would need to be considered in the context of providing adequate funds for predicted social care needs.

The Green Party support all cooperative forms of home and land ownership including mutual retirement housing and specialist retirement co-housing. Like housing associations, the potential for cooperatives to serve particular needs should also be recognised, e.g. for people with mental health or learning disabilities, with substance misuse problems, the formerly homeless, ex offenders and women fleeing domestic violence. Cooperatives have significant potential to enable such people to keep control of their lives and creating communities with mutual aid enables people to retain their independence.

The social model of disability⁶ should be taken into account in relation to new homes for both older people and younger people with mobility issues. This requires that all homes and other environments are accessible to those with physical disabilities. This means that all homes should be designed to make them suitable for wheelchair users for instance.

However all housing requirements should be considered in association with our need to reduce energy demand.

⁵ http://www.housingcare.org/housing-care/facility-info-160328-montgomery-court-strood-england.aspx

⁶ http://www.scope.org.uk/about-us/our-brand/social-model-of-disability

Housing: Reducing environmental impact

Empty homes:

The shortage of housing is made worse by homes being left empty for long periods. In 2014 when figures were last provided 1004 homes in Medway had been empty for more than six months⁷ and this may not be an accurate figure as it will only reflect the housing that Medway Local Authority has been informed of. Before building any more homes, particularly before considering building on green spaces and environmentally sensitive land, the first focus should be on measures that might bring unused, or underused existing stock back into use. It is of note that the body within the council responsible for bringing empty homes into use was cut in 2014 which may have had an impact on future success. We would ask that Medway Council ensure that strategies for bringing empty homes into use are fully operational.

The Council should draw up a register of empty property. They should also make much more proactive use of Empty Dwelling Management Orders and work with self-help co-operatives to bring homes into use.

Empty homes awaiting refurbishment can provide short term, flexible, accommodation at a lower than market price, cutting down on the period that they are left empty. Schemes exist that arrange property guardians such as Dot Dot Dot.⁸

Empty offices:

Researchers in Bristol recently uncovered evidence that over 15 million square feet of office space in the city lies empty. This is equivalent to 40,000 houses worth of space, a figure that exceeds, by a considerable margin, the homeless and waiting list problem in that city. It is likely that all major conurbations in the UK have a similar problem and that Medway is no exception. Additionally the proportions could be similar. This may have the potential to solve the entire housing shortage.

Much of this office space is reportedly left empty in order to balance the books of large investment portfolio companies who can inflate their balance sheets by keeping properties empty. This is because the market value (rentable value) will remain fixed, allowing them to 'fix' the value of property on their books. This may be beneficial for the company concerned but this space could and should be used for housing and also for small businesses and start-ups that have very little affordable business property to choose from in Medway. A thorough audit of all empty office space should be conducted annually and the council should create incentive schemes to reduce this problem and/or introduce penalties for companies and landlords who deliberately allow buildings to remain unoccupied.

Where to build

Of the 29,463 projected dwellings envisaged, the Council is still hoping to build 5,000 of them (17%) at Lodge Hill, despite the environmental issues and damage to wildlife. The Council is also suggesting building other large housing developments on the Grain Peninsula on green field sites using valuable agricultural land.

⁷ http://www.kent.gov.uk/__data/assets/pdf_file/0015/7350/Vacant-and-empty-housing-property.pdf ⁸ http://datdatdatarapagty.com/chout/

⁸ http://dotdotdotproperty.com/about/

The Council appears to be seeking approval to adopt the easy options to providing homes in the Medway area avoiding the more difficult tasks associated with finding a multitude of solutions to a myriad of issues.

If the easy options in planning are adopted, in the future, there will be no agricultural land or other countryside left for the increased population to enjoy.

Medway Green Party will continue to object to development at the Lodge Hill site or any other environmentally important areas. The Lodge Hill site has been designated a Site of Special Scientific Interest (SSSI) as it supports the UK's largest nightingale population which could be destroyed if the development goes ahead, along with many other rare species and habitats. This is in the context of quantitative assessments conducted by the RSPB⁹ which showed a 60% decline in 3,148 wildlife species in the last 50 years, with a strong decline in 31% of these. Much of this decline is the result of human encroachment on wildlife habitats, including development of land and modern farming practices. Not only is this site of vital importance locally but using it for development would set a dangerous precedent for other SSSIs across the country.

The development strategy for the Local Plan includes the following:

- 1. high density town centre and riverside development
- 2. incremental suburban development
- 3. planned growth of existing settlements
- 4. freestanding settlements
- 5. urban extensions
- 6. role of custom and self build housing
- 7. approaches to the town centres

A mixture of different options may need to be considered including both high density housing which must be close to transport hubs and incremental suburban development. We would favour smaller developments of not more than 25 homes at a time, rather than large urban extensions. We would not be in favour of freestanding settlements due to the additional infrastructure requirements which are likely to damage even more of our countryside. Any planned growth of existing settlements should be no more than 5% in the 20 year period. We would, however, welcome the option of custom and self-build developments within the context of cooperatives formed of local people. These should be sympathetic to the natural environment and provide a real opportunity to empower local citizens and further social equality.

There are also additional options which may be considered:

- 1. redundant offices
- 2. space above shops
- 3. space above supermarket and other car parks
- 4. Ex-industrial
- 5. On the river

Housing zones:

We are concerned that the use of housing zones to stimulate house building projects is more geared towards the needs of investors than those of the local population. This could produce a blanket type approach which is insensitive both to the local population and the natural

⁹ http://www.rspb.org.uk/Images/stateofnature_tcm9-345839.pdf

environment. We need to start providing homes instead of using the housing market as a way to prop up economic growth.

What to build

Outdated norms:

Our normal perception of life is that things don't change from one day to the next, but when we look back over ten or twenty years we see that immense changes have taken place.

This is why the Local Plan strategy needs to be elastic and able to accommodate changes in living patterns, life style and economic circumstances.

It is imperative that the Local Plan does not constrain people to a limited choice of life style based on outdated norms.

Bricks are used here as an example of an outdated norm; there are many other materials in common use that are just as inefficient and costly as the brick example.

Vernacular construction techniques were inherently economic and benefitted from hundreds of years of ingenuity being applied to their development.

Current so-called traditional building methods are not inherently economic, they use up scarce resources and produce carbon emissions in the production of building materials and create enormous waste in their assembly.

Our 'traditional' construction industry is part of a 'linear economy', that uses resources without considering their true worth or the impact our actions will have on future generations. The Planning System could be a leading exponent and facilitator of a 'circular economy' in which we design-in adaptability, re-use, recycling, re-engineering and retro-fitting as the norm, in place of short lifetime, redundancy and a 'throwaway' policy.

Brixit

Back in Victorian times it probably made sense to build solid brick walls; labour was cheap, fuel was cheap and air quality wasn't discussed.

We currently hear construction industry commentators bemoaning the fact that in light of the massive house building programme, soon to get underway, bricks are in short supply and holding up construction work and even, if we had them, there aren't enough skilled people to build with them.

Bricks seem to be beloved by planners, yet actually do not earn their place in the fabric of a building. With careful design, bricks will keep out the rain despite some commonly used face bricks being able to absorb 25% of their mass in water.

Bricks commonly have a heat conductivity coefficient of 0.84 W/m degC. This means that a 100mm wide brick is eight times more efficient at conducting the heat out of your house than an insulation block, or conversely eight times less efficient at conserving the heat in your home. Bricks are also forty times less efficient at conserving heat than the same thickness of polyisocyanurate insulation (e.g. celotex)

Timber has about the same heat conductivity coefficient as an insulation block and 100mm of timber would be six times more efficient at conserving heat than the equivalent thickness of brick.

When all the environmental and other costs are considered, bricks can be seen as an extremely expensive building material.

There are now no brickyards, quarries or other sources of traditional building materials in Medway. No reason therefore not to promote a factory made approach to construction whether for dwellings, apartments, student hostels or even houseboats.

The delivery of housing could be assisted and accelerated by the growth in the use of off-site construction. Prefabricated homes have come a long way since the poorly constructed post-war models.

Three storey houses:

In Georgian and more commonly in Victorian times the space formed by the roof structure of a house was used to accommodate servants.

This was possible because the slates and tiles used needed a fairly steep pitch in order to function effectively. Consequently roof pitches in excess of 35 degrees were the norm.

Roofs continued to be made with steep pitches until the double lap large format roof tile was introduced about fifty years ago and this allowed shallower pitches and the use of low grade timber trusses to be used to support the roof structure.

A large number of two storey houses from the first half of the twentieth century had up to 20% of their volume enclosed in an unused loft space.

The recent plethora of 'loft conversions' is witness to the lack of foresight, not only of the original developers who built these redundant spaces but also the more recent fashion for lower pitched roofs that in the cause of cheapness reduced the usefulness of the expensive roof space.

Encouraging developers to build three storey houses with purpose designed rooms in the roof will allow the actual footprint of the house to be reduced and save money on land cost, infrastructure and servicing.

Passivhaus standard homes and retrofitting:

Passivhaus buildings provide a high level of occupant comfort while using very little energy for heating and cooling. They are built with meticulous attention to detail and rigorous design and construction according to principles developed by the Passivhaus Institute in Germany, and can be certified through an exacting quality assurance process.¹⁰

Not only does building homes to this standard contribute to combating climate change but has the positive effect of large savings in energy bills. In a development of 51 houses in Rainham, Essex (built by Circle Homes, a Social Housing Provider, in partnership with Climate Energy Homes)¹¹ a three bedroom detached house was monitored for heating

Affordable passive homes

Built on a brown field site which was formerly a Carpet Right warehouse, a new development in Rainham, Essex provides 51 rentable homes, designed to passive house energy standards. These have been built by a partnership between Circle Homes (a social housing provider) and Climate Energy Homes (a business who supply factory built homes using the ecoTECH build system). The homes can be erected to be weather tight within one day and fully completed ready for trade and services within one week per house, at an equal cost to that of building a traditional house. [11]

¹⁰ http://www.passivhaustrust.org.uk/what_is_passivhaus.php

¹¹

http://www.circlegroup.org.uk/news/News_archive/2014/04/25/12/29/Cabinet_minister_praises_UKs_first_1 00_percent_affordable_passive_homes_scheme

and hot water bills. The bills were £260 per year in comparison with the UK average of £1200.

Medway Council should explore such options which could help in addressing fuel poverty in the Medway Towns. It is of note that in the Fuel Poverty and Conservation Strategy¹² (undated) more than a quarter of Medway households were defined as in fuel poverty:

- 23.2% of Medway households are spending more than 10% of their income on fuel costs

 fuel poverty
- 3.40% of Medway households are spending more that 20% of their income on fuel costs severe fuel poverty
- 0.60% of Medway households are 30% or more on their income on fuel costs extreme fuel poverty.

Much of this is due to a combination of deprivation and older properties and the options relation to retrofitting the existing stock should also be explored and implemented.

Sustainability/Climate change

The consultation document suggests ways that planning can mitigate climate change as follows:

- 1. Increased renewable and low carbon energy generation.
- 2. Reduced energy demand and improved energy efficiency, both in new buildings and retro-fitting to existing buildings.
- 3. Distributing new development in a pattern that reduces the need for travel and maximises the potential of more sustainable methods of travel to reduce emissions from private transport use.
- 4. Where new technologies can reduce the emissions from a business of home, supporting planning applications to enable this.

We are in full support of all of these measures. We are also in support of improvements in education skills and training and have in the "Economy" section stressed how this would provide local economic benefits if Medway were to become a base for the development and manufacture of renewable technologies and factory built energy efficient housing.

We are, however, concerned, that the consultation appears to suggest that there is uncertainty about climate change when in fact the opposite is true. Combating climate change must be a core objective not tagged onto an associated social good. The prevention of climate change is in itself a social good. The cheap and easy options suggested of planting more urban trees, providing more space for food growing and orientating buildings to take advance of natural cooling, while welcome, are much too limited. We only have a short window of opportunity to make a difference – falling within this plan period. Bad decisions taken now will be very difficult to unravel.

¹² http://medway.gov.uk/pdf/fuel%20poverty%20and%20home%20energy%20conservation%20strategy2008-11.pdf

Water shortage:

We are of the opinion that local evidence justifies improved water efficiency in new dwellings and this should be followed as a matter of course in all buildings.

Economy and our towns

The challenges presented by the need to combat climate change also present economic opportunities which this consultation has failed to take account of. There is potential for employment in all areas of energy conservation and production including the following areas:

- 1. Research and development of renewable technologies
- 2. Manufacture of renewable technologies
- 3. Manufacture of factory built (passive) or energy conserving homes
- 4. Retrofitting existing homes

There is also potential for economic revival alongside reduction in CO2 emissions by focussing support on developing clusters of local businesses instead of outside investment. This both cuts down on travel distances and improves employment opportunities for the local population.

A study commissioned by the JPMorgan Chase Foundation suggests that inner cities which suffer from high depravation levels in the United States have benefitted from this approach¹³.

A report commissioned by the same organisation makes a case for 20 minute neighbourhoods.¹⁴ This is the concept of reducing distances between amenities to a 20 minute walking distance, which cuts down on unnecessary car use. We are encouraged that this consultation document includes reference to the need to shorten distances but would suggest that there is a need for this focus to replace that on large infrastructure projects such as road expansions and other large development projects.

The acceptance of the concept of 20 minute neighbours would mean that plans should aim for a future where housing, employment opportunities, and services would exist in close proximity to each other and transport links.

High Streets:

We agree with the suggestion that our high streets would benefit from a different focus, rather than attempting to compete with Bluewater. Again, efforts should be concentrated on encouraging and supporting local independent retailers, which might be assisted by lowering the business rates for Chatham High Street. It is of note that we recently witnessed the departure of Rooks on account of excessive business rates charged in the area. We also agree with the introduction of a street market at Chatham but do not see the need for another supermarket in Gillingham High Street. Instead the focus should be on retaining and attracting new independent suppliers of locally sourced food. We feel that all high streets would benefit from investment and that Chatham should not be the sole beneficiary.

¹³ http://www.icic.org/ee_uploads/publications/Local_Cluster_Paper.pdf

¹⁴ http://www.icic.org/connection/blog-entry/blog-the-rise-of-the-20-minute-neighborhood

Environment/open spaces

Medway Green Party members welcome the suggestion of greater access to the river, and are interested in the proposal for a joined up river walk through the historic towns, riverside regeneration and countryside. We are also interested in the proposed cycle route between Medway and Maidstone. It has been noted that restricted access to pedestrian and cycling only is unlikely to impact on the needs of wildlife. Floating walkways may be a possibility. We would also like to see a cycle hire scheme introduced in Medway which is similar to that brought in by Boris Johnson in London, whereby cycles can be hired from cycle racks and dropped off at a different point of the journey.

The Medway City Estate:

Despite the Medway Road Tunnel the Medway City Estate needs to be better connected to the southern side of Medway.

Ideas to achieve this include the following:

- 1. A footbridge from near the new Rochester Railway Station across the river
- 2. A ferry from Sun Pier near Chatham Bus Station across the river.
- 3. A lock opposite the Gun Wharf building with connecting bridges.

The lock would make it easier for ships to access the docks, make the river above the lock more accessible, reduce the damage to boats currently being floated twice a day and provide a hydro-electricity producing weir, as well as a site for tourists and entertainment.

Open spaces:

Seeking to preserve the integrity of open space is an entirely appropriate ambition and we should not be seeking to rationalise it. We should instead be looking at alternative options to meet housing needs, such as those suggested in our "where to build" section.

Flood risk

Flooding in urban and rural settlements is a fact of life, and is set to get worse as our climate changes. Flood risk will change over time and should be regularly reviewed. Local plans should aim to reduce flood risks arising from all sources (rives, tidal surges, sewers, groundwater, surface water and infrastructure failure). Individual developments should minimise the loss of permeable surface area and increase it where possible. Where development entails a reduction of permeable surface area, it must mitigate the resulting increase in surface water runoff using Sustainable Urban Drainage Systems (SUDs). Loss of permeable surfaces in existing developments such as front and back gardens should be avoided.

The role of trees and vegetation in preventing surface water flooding must also be taken account in planning decisions. Water sinks into soil under trees at 67 times the rate at which it sinks into soil under grass.¹⁵

¹⁵ http://www.theguardian.com/commentisfree/2014/jan/13/flooding-public-spending-britain-europe-policies-homes

In rural areas, smaller areas of agriculture broken up by trees and vegetation rather than large monocultures are not only better for wildlife but also have benefits in helping to absorb surface water and prevent flooding.

In urban areas, Urban Forestry has been introduced, for example in Portland Oregon, to reduce flooding and improve the quality of surface water run-off from residential streets.

The planting of trees in residential streets also helps to improve the air quality.

Air Quality

Please see below our previous response to Medway Council's Draft Air Quality Action Plan 2015. The measures we have suggested are consistent with our overall approach to the Local Plan consultation, and point further to the need for a holistic approach to many of the challenges we are faced with:

Medway Council have highlighted that air pollution is a major issue within the UK, which reduces life expectancy by an average of 7-8 months with estimated equivalent health costs of up to £20 billion each year.

The Green Party welcomes the Council's Action plan. However, while it does touch on the main issues, Medway Greens believe far more could be done to address air pollution. These include the following measures:-

1) Promote a switch from car use to Public Transport

(i) We would encourage the Council to divert funding from roads to public transport and cycle routes. The Council's action plan includes road improvements on the assumption that that this will speed the flow of traffic and so reduce pollution. As Greens our concern is that this investment may simply increase the overall volume of road traffic. A more effective approach may be to use these funds to enhance public transport and cycle routes.

(ii) While we welcome the Council's commitment to promote public transport, this does appear at odds with the recent cuts in bus services. The Green Party would encourage the Council to liaise with the bus company to seek to reverse these cuts. Ideally the Council and the bus companies should consult with passengers on routes and their frequency. A further issue is the high cost of fares for non subsidised passengers.

(iii) Another area for potential improvement is to ensure integration between bus timetables and train services.

2) Reduce the Amount of Freight on the Roads

Medway Green party would seek to reduce the amount of freight carried by road. Where practical, the Council should encourage a transfer of freight from roads onto the rail network. In addition, the Council should promote local sourcing of goods and services. This would not only be more environmentally friendly but would also benefit the local economy.

3) Cycle Network

Medway Greens welcome the Council's commitment to improve the cycle network. Cycling could replace a number of short car journeys and also has positive benefits for health and fitness. Our concern is that the existing network is rather fragmented. We would support a comprehensive and dedicated cycle route throughout the Medway towns, which provides cyclists with their own

space separated from other road traffic and pedestrians.

4) Walking

The Green Party would encourage the Council to review the main pedestrian routes in Medway. Pedestrians often have to share pavements with parked cars and cycles, which may cause problems for the non able bodied or parents with push chairs or prams. It is also important to confirm that there are sufficient crossing points. Many of the immediate pedestrian routes around rail stations are particularly poor. Improvements to these routes and possible extension of pedestrian areas in town centres may encourage more people to leave their cars at home.

Energy

Opportunities for using the waste heat of power stations and for using carbon capture may be worth exploring but ultimately the focus (and any investment available) must be on increasing the use and access to renewable technologies. Medway Green Party agrees in principle with exploring the potential for wind energy on the Hoo Peninsula in consultation with wildlife groups e.g. RSPB in relation to where wind turbines are sited. It has been noted that the impact is likely to be in the planning stages, and that, once built, there is little impact on bird populations if sited appropriately.

We would also suggest that the Isle of Grain may provide a site for solar energy in replacement of obsolete oil tanks.

Rooftop solar energy should be a condition of all new developments and introduced to existing housing and other buildings which are under Council control.

We would encourage measures towards an environment that supports community initiatives and involvement in local energy production. Communities not only respond better to being included very early in the decision making processes but to being co-producers in schemes that provide energy for their own communities. The benefits of this approach (including monetary savings) should be promoted at all levels.¹⁶

It would also be worth exploring the benefits of the use of wind turbines small enough for installation on any roof or wall such as the Liam F1 mini model manufactured by The Archemedes.¹⁷

Apart from hydro-electricity associated with a lock [see section on Medway City Estate] the river can be used in conjunction with water source heat pumps that could provide a district heating system for the

Community led energy initiative

"In the summer of 2011, Transition Bro Gwaun's Renewables Group, with support from the Welsh Government's community renewables programme, Ynni'r Fro, started to look for sites for a local community wind turbine. Four years later we have a turbine up and running!

Having gained planning permission, the next task was to raise the £285,000 needed for TBG's 50% share which proved easier than expected, the whole amount being lent by 29 individuals and 3 local community groups within 6 months.

The turbine will have an output of approximately 530,000 KWh per year, the equivalent of powering approx 130 homes, and annual carbon savings will be circa 290 tonnes of CO². In addition to the obvious benefit of generating renewable energy, all interest on borrowings will go to local lenders and TBG's share of the profit will be used to help to fund other low carbon community projects.

Local investment and support from Ynni'r Fro have been key factors in making this project happen". [16]

¹⁶ More detailed report on community wind turbine project available http://www.transitionbrogwaun.org.uk/

¹⁷ http://dearchimedes.com/liam-f1-mini/

new riverside developments, as well as providing an inexhaustible renewable energy source for the many Council buildings sited close to the river.

The river also has potential to use tidal energy in various forms.

It should also be noted that at present we import the technologies used in producing renewable energy. We should be investing in training in local universities and colleges, backed up with vocational training, in both the research and development of renewable technologies and in the production of these technologies. To make Medway the centre of innovation in renewable technologies would bring enormous benefits, not only in taking a step forward in combating climate change but also in reviving the local economy.

Transport:

Our approach to transport is outlined in our response to the Medway Council's Draft Air Quality Action Plan 2015. We welcome the noted need, in the consultation, for improved infrastructure for cycling and walking and for an effective, accessible and affordable public transport system. We also welcome the indication that sustainable travel would be central to the design of any new developments. Achieving sustainable travel means that travel options will need to be considered in the context of reducing CO2 emissions as well as preventing the loss of vital ecosystems.

As noted in our response to the Medway Council's Air Quality Action Plan 2015, expansion of the road networks is likely to have the unintended consequence of increasing car use.¹⁸ We are disappointed that the Medway Council Local Plan consultation indicates measures that will continue us along this path, with the associated detrimental effects on local communities who live near proposed road expansions and new road infrastructure. It is likely that these expansions would be associated with increased noise and pollution levels, potential loss of countryside and ecosystems, together with a further reduction in our ability to respond to the challenge of climate change. In this context we are concerned to read of the planned upgrade between the Four Elms Roundabout and the Medway Tunnel. We are also actively opposed to the proposed new Lower Thames Crossing. Measures to reduce congestion should focus on providing accessible and affordable alternative transport solutions to car travel rather than expansion of the road network.

Improving conditions for pedestrians:

Many of the residential streets in the Medway Towns were not designed to accommodate cars, and are now partially blocked with parked cars.

This creates a dangerous environment for people crossing the road, especially children. A speed limit of 20 miles per hour should be enforced on all tertiary residential estate roads and within 500 metres of all schools.

In addition a switch from dependence on car travel to alternative travel options may go some way to alleviating this problem.

Rural issues

Rural communities would benefit from greater access to services, for instance a convenience store and Post Office within walking distance, and more frequent and affordable public transport. This would also have environmental benefits in reducing car use. It may be that expansion in housing would improve access to local services but it is unclear whether there is a direct link. Chattenden, for example, has already seen new housing development but still lacks basic

¹⁸ http://www.bettertransport.org.uk/roads-nowhere/induced-traffic

amenities. The proposed development at Lodge Hill has been suggested as a solution to this lack of services at Chattenden, but represents a whole new town which would completely change the character of the existing settlement. The solution may be to constrain any development to small developments which are sensitive both to local communities and the natural environment and to make the provision of basic services a condition of that development.

Deliverability

Community infrastructure levy:

Medway Green Party is cautiously supportive of the adoption of a Community Infrastructure Levy (CIL) approach as a replacement for Section 106 agreements, with charges based on floor space and contributions to a general infrastructure fund. This could represent a small step towards a funding structure commonly known as Land Value Taxation¹⁹ the introduction of which is a long term goal of The Green Party.

One of the issues the consultation document raises in this section is potential reduction in funding as a result of exemptions from the CIL. We wondered whether it would be worth considering raising standard tariffs to take account of predicted concessions based on the level of "affordable housing" needed.

New methods of delivery:

We feel that it would help to have some flexibility over permitted development rights in order to cater for changes in working practices that cannot at this point be predicted. For instance, there has been a shift towards home working. This, in turn, means a smaller requirement for office space which could be converted to meet growing housing needs.

We are, however, concerned about options such as Local Development Orders and Permission in Principle or any other blanket type proposals; we are concerned that they could mean a reduction in the proper consultation process and detailed environmental surveys. We would urge that planning decisions continue to be made on a case by case basis.

However, the planning department should aim to encourage and prioritise initiatives related to renewable energy production and energy conservation, particularly small scale initiatives such

Land Value Taxation

Land Value Taxation is not really a tax but a system whereby landowners pay a yearly rent to the community (represented by the Local Authority) based on the maximum value of land owned in its current usage. It represents a payment for betterment which has resulted from wider community activity to which the landowner has made no contribution. The difference to current funding structures is that it would be payable on all land, irrespective of whether it has planning permission, and would not be influenced by improvements. Thus it is likely to encourage such improvements as it would not lead to a higher assessment. It would also be likely to reduce the hoarding of land as a speculative investment. It is regarded as a replacement for Council Tax and business taxes, and would be expected to reduce those payments for the majority of households. [19]

as community led cooperative projects and adaptations to individual properties. In these instances there may be a need to relax planning controls.

We also feel that enterprise zones should be more focussed on provisions for start-ups and very small businesses as there is a distinct lack of this type of provision in the Medway area.

¹⁹ http://www.andywightman.com/docs/LVT_england_final.pdf

Name: John Luck

Reference 169

Organisation

On Behalf Of

Type of Consultee Member of the public

maryott, kyle

From:John LuckSent:19 January 2016 18:26To:policy, planningSubject:Response to Q75 Local Plan issues and optionsFollow Up Flag:Follow upFlag Status:Completed

Dear Sir,

I should like to offer my response to Question 75) How should the aviation facilities at Rochester Airport and Stoke be considered in the Local Plan?

For many years since 1931, when the then Rochester Council members decided that part of the land now occupied by Rochester Airport should be compulsorily purchased and be set aside as "an airport for all time", Medway residents have benefited from this asset and yet, since Marconi/BAe handed back their lease in 1999, we have been bombarded by calls for it to remain open or to be closed and built on by various interest groups and local agitators.

Having seen in the recent 18 months another valiant attempt by the present council, we have yet another repeat of this ridiculous yes/no politics. Isn't it about time that we looked back at the decisions made for the good of us all, in Medway and wider areas to have an airport; by those elected members, to build and maintain a long term aviation facility at Rochester, for that decision to be respected and at last to drive through all of the trumped up objections and legal challenges to sort this facility out once and for all.

In no other business I know of would it take so long to lay a simple piece of tarmac to allow operation when an otherwise piece of boggy ground is unusable. Other operators would have been driven out of business by now and it is only by the generosity of a few local people has the facility been preserved as it is.

In this next plan for Medway please ensure there is are positive statements to keep, maintain and improve these facilities to bring benefits to the whole of the community, not just by creating jobs at the site but by bringing often unseen benefits to business in general by having a facility in Medway that no other local town has.

Thankyou

John Luck

Name: Alan Best

Reference 170

Organisation

Swale Borough Council

On Behalf Of

Type of Consultee

Government/Public Body

Swale House, East Street, Sittingbourne, Kent ME10 3HT DX59990 Sittingbourne 2

www.swale.gov.uk



Date as email

BY EMAIL ONLY

FAO Catherine Smith

Dear Catherine

Medway Local Plan Issues and Options Consultation January 2016

Thank you for consulting Swale Borough Council in respect of the above. The Council offers the following comments and observations.

Vision (incl. Duty to Co-operate)

SBC welcomes the publication of the consultation as the first and important step in securing a Local Plan for Medway.

SBC acknowledges the joint working that both Swale and Medway have undertaken in terms of the Duty to Co-operate; specifically our respective evidence base in respect of Strategic Housing Market Assessment. SBC greatly appreciated the evidence given by Medway at its recent Local Plan Examination and SBC reconfirms its position that it intends to meet its objectively assessed need for housing as determined by the Examination interim findings.

Economy

SBC has no particular observations on the specific matters highlighted by the consultation document, although it supports the need for a strong Medway economy given the relationships between our respective Councils.

SBC notes the aspirations for an enhanced and expanded Chatham town centre. Given the relationships between Swale and Chatham for shopping, together with Swale's own intentions to stabilise its own town centre with further retail and leisure provision, SBC will wish to scrutinise any retail assessment work to be undertaken by Medway. In particular, SBC will wish to ensure that such proposals are complementary to the existing role of town centres like Sittingbourne and Sheerness in Swale.

In terms of tourism potential, as an observation, there appeared to be no mention in the consultation document of the role of the natural environment in terms of encouraging tourism, in particular the NK Marshes.

<u>Housing</u>



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The 2015 SHMA

As you will be aware when we met in September 2015, we discussed a number of matters relating to the SHMA work being undertaken (at that time) for Gravesham and Medway by GVA. You will recall that we discussed a number of matters/concerns relating to evidence and the approach concerning:

- HMA geography
- Demographics
- Market Signals
- Economic/commuting
- Affordable homes uplifts

Depending upon how Medway resolve to take these issues forward in terms of any future housing target and its approach toward the Duty to Co-operate, SBC reserves its position in respect of these matters.

Concerning provision for Gypsies and Travellers, obviously Medway will reflect upon the changes to the PPTS relative to the GTAA work previously undertaken. SBC hopes that the PPTS changes will enable Medway to bring forward a range of measures that can ensure that its GT needs can be met in full within its administrative boundaries.

Options for growth

SBC consider that meeting an OAN of 29,463 for Medway will be a considerable challenge, especially in the light of on-going uncertainties concerning the role of Lodge Hill. However, the options for growth outlined in the consultation document appear reasonably comprehensive and as an observation it seems likely that use of more than one approach should not be ruled out. Whilst SBC reserves judgement at this stage in respect of any preferred approach, clearly the options that have the most significant implications for Swale (see environment below) are those associated with settlement expansion, notably at Rainham.

Environment

Both Medway and Swale share a number of important environmental assets/constraints – notably the SPAs of the NK Marshes (where we have been undertaking joint work via NKEPG), best and most versatile agricultural land, important landscapes and vulnerable countryside on our respective eastern/western boarders. SBC would wish to make the following observations:







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Making Swale a better place

- <u>NK SPAs</u>: SBC notes Medway's intention to implement the mitigation necessary to offset recreation pressures as currently promoted by the NK SAMMS project;
- <u>High quality agricultural land</u>: It seems likely that as with Swale, Medway will find considerable development pressure on this important national resource. It remains to be seen whether the prevalence of this resource in Medway can act either as a dampener on the supply side of the housing debate or whether it is primarily an influence on the distribution of growth. For Swale, it was clear that the Inspector did not view the resource as an environmental constraint that should moderate the overall development target.
- <u>Local Landscape Designations</u>: Both Swale and Canterbury Local Plans have given recognition to the North Kent Marshes as a Local Landscape Designation (as previously undertaken by the former Kent and Medway Structure Plan). As an important 'county' cross boundary resource, the preparation of the Medway Local Plan would seem an appropriate opportunity to reciprocate the designation within Medway. Preparation of a landscape assessment would be a way forward in this respect. It is hoped that Medway will share this view.
- <u>Settlement separation</u>: You are of course well aware of the concerns of our respective Councils concerning the pressures on land east of Rainham toward Upchurch and Hartlip. Clearly Medway will need to assess all reasonable development options, however, given the likelihood that the settlement gap between the Borough boundary and Upchurch will be confirmed via Swale's own Local Plan process, Medway will want to consider whether to reciprocate the 'gap' on the remaining land within its administrative boundary, including giving consideration to the land between Mierscourt Road and Swale boundary.
- <u>A2 corridor between Medway and Sittingbourne</u>: We have previously discussed the development pressures within the A2 corridor and its attendant impacts associated with suburbanisation, traffic growth and air quality. Clearly the growth levels of our respective Local Plans will inevitably place pressures upon this corridor; however, some growth options may have greater impacts than others (see above).
- <u>Green Belt</u>: SBC notes the reference to one option involving a potential Green Belt review. SBC has no detailed views on this matter at this stage, other than that given the likely development pressures facing Medway, it will be important that all options, including a Green Belt review, are thoroughly explored before arriving at the preferred approach.

Infrastructure







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Making Swale a better place

Clearly both Councils will want to reflect on the current consultation on the Lower Thames Crossing and its implications for Medway's development strategy.

In the case of health needs, as highlighted by the Issues and Options consultation, Medway Hospital is a key facility for both Medway and Swale residents. As observed by the document, this is a highly constrained site and increasingly difficult in terms of access. SBC is aware from its own Local Plan work that the NHS is undertaking a strategic health review and it will be important to reflect these conclusions in moving forward with the Medway Local Plan.

I trust your Council will find the above comments useful and we look forward to further discussions with you as your plan progresses.

Yours Sincerely



Alan Best Principal Planner Swale BC



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Name: Andrew Wilford

Reference 171

Organisation Barton Willmore

On Behalf Of Redrow Homes(southeast)

Type of Consultee

Developer/Consultant

Representations to Medway Council Local Plan

Issues & Options 2012 – 2035 Consultation Document

> SUBMITTED ON BEHALF OF REDROW HOMES (SOUTH EAST)

> > February 2016


REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN

ISSUES & OPTIONS

2012 - 2035

CONSULTATION DOCUMENT

SUBMITTED ON BEHALF OF REDROW HOMES (SOUTH EAST)

Project Ref:	23486/A5/HH
Status:	Final
Issue/Rev:	02
Date:	29 February 2016
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Ref: 23486/A5/HH/AW/kf/mg Date: 29 February 2016

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1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Redrow Homes (South East) in response to Medway Council's Local Plan Issues and Options 2012 – 2035 Consultation Document (MCIOCD) published in January 2016. As a landowner within Medway, Redrow Homes has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 1.2 **These representations focus on promoting Redrow Homes' site known as 'The** North Field, Halling' (The Site). A Site Location Plan is included at **Appendix 1**.
- 1.3 The Site forms part of the wider St. Andr**ew's Park Development which is currently being built** out by Redrow Homes (hybrid planning application reference: MC/12/1791) for 385 dwellings and associated mix of uses. The Site currently lies within the Green Belt.
- 1.4 The Site is identified in the Medway SLAA 2015 (site reference 352) with the potential to deliver up to 50 dwellings. The Site comprises 6.84ha and is bound by residential development to the north, west and south. The A228 runs directly to the east of the site.
- 1.5 The Site itself is currently an unmanaged, sloping field with land rising from east to west, comprising a block of woodland in the southern corner adjoining the A228 and an area of scrub/woodland to the south-western corner adjoining Pilgrims Way/Road. A low voltage (33kv) overhead powerline crosses from west to east on the southern edge of the Site.
- 1.6 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework [NPPF] (March 2012), National Planning Practice Guidance [NPPG] (March 2014), the Consultation on Proposed Changes to National Planning Policy [CPCNPP] (December 2015) and The Rural Productivity Plan [RPP] (August 2015).
- 1.7 The MCIOCD advises that the current consultation is in advance of the preparation of a new Local Plan, and therefore is not a formal Regulation stage under the Town and Country Planning (Local Planning) Regulation 2012 ('the Local Planning Regulations'). The Local Development Scheme 2015 2018 (November 2015) anticipates that a "Preferred Options" consultation will be undertaken in January to February 2017, forming the first formal stage in the Local Plan's preparation (under Regulation 18 of the Local Plan Regulations).

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- 1.8 Whilst the consultation is welcomed, it should be recognised that the MCIOCD does not contain any detailed policies or identify specific development sites (excluding reference to the unknown outcome of Lodge Hill) that can be assessed, and therefore due to the "broad" nature of the questions posed, the benefit of the consultation responses to MC will be limited in this regard.
- 1.9 In addition, the MCIOCD has not been accompanied by a suite of Evidence base documents that should inform the production of a new Local Plan. Indeed, the Strategic Housing and Economic Needs Assessment (SHENA) was not made publicly available until 19 February 2016, i.e. 6-weeks from the start of the consultation period, and 1 week from its close.
- 1.10 These representations focus on relevant matters and/or specific questions relating to the release of the Site for residential dwellings and address the following chapters:
 - Housing (MCIOCD Questions 4 14);
 - Environment (MCIOCD Questions 30 32);
 - Rural Issues (MCIOCD Questions 38 42)
 - Deliverability (MCIOCD Questions 76 79);
 - Development Strategy (MCIOCD Questions 80 87).
- 1.11 We recognise that this consultation document is at the early stages of the Local Plan preparation and therefore further evidence and consultation will provide for greater clarity on a number of areas.
- 1.12 Alongside the Consultation Document, Medway Council has prepared a number of supporting Evidence Base documents. We do not seek to assess each one in detail, but draw upon:
 - North Kent SHENA (March 2016)
 - The SLAA (November 2015)
 - Authority Monitoring Report (December 2015) which sets out how MC will fulfil its 'Duty to Co-operate with neighbouring LPAs and Public Bodies.
 - North Kent SHMA (November 2015)

i) Barton Willmore Supporting Evidence

1.13 In addition to commenting on specific questions, these representations are supported by technical reports that demonstrate that the release of the Site from the Green Belt is appropriate and that there is a requirement to undertake a Green Belt review in order to meet the full OAN housing target.

- 1.14 Barton Willmore Research has undertaken a critique of the published SHENA entitled *Objectively Assessed Housing Need Medway Unitary Authority* (included at **Appendix 2**). It is a standalone document and assesses the housing requirements put forward within the MCIOCD and determines the soundness of the objectively assessed needs within Medway.
- 1.15 Barton Willmore Landscape Planning and Design has prepared a Landscape Appraisal and Green Belt Review (included at Appendix 3). The Report provides a Landscape and Visual Appraisal of the Site and assess the Site's contribution to the purposes of the Green Belt, in-line with National and Local planning policy.
- 1.16 The supporting Reports demonstrate that there are concerns with the identified OAN housing target and that a higher housing figure should be pursued as at present it is considered that this is unsound. In any event, there is a need for a Green Belt review (notwithstanding the required uplift) and the supporting information demonstrates that the Site is appropriate to be released as part of a small scale Green Belt review in this location.
- 1.17 The release of the Site will provide housing to be delivered in this rural part of Medway and sit alongside recently constructed development that will complement the St. Andrew's Park development and contribute to the character of Medway in this location.

2.0 NATIONAL PLANNING POLICY

i) National Policy & Plan Making

- 2.1 The NPPF (March 2012) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:-
 - <u>an economic role</u> contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - <u>a social role</u> supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect **the community's needs and support its he**alth, social and cultural well-being; and
 - <u>an environmental role</u> contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
 (Para. 8)
- 2.2 The presumption in favour of sustainable development, as set out in the NPPF should be seen as a golden thread, running through both plan-making and decision-taking. For plan-making this means that:
 - Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area;
 - Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted.

(Para. 14).

- 2.3 LPAs should 'submit a plan for examination which it considers is "sound" namely that is:
 - **Positively prepared** the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and:
 - Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.
 (Para. 182).
- 2.4 The NPPF considers that Local Plans should:
 - plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
 - be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
 - be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
 - indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
 - allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
 - identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
 - identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
 - contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified. (Para. 157).

2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. (Para. 158).

ii) **National Policy & Housing Need**

- 2.6 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, 'Objectively Assessed Needs' (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.
- 2.7 LPAs should plan for a housing mix which takes into account "housing demand and the scale of housing supply necessary to meet this demand." Household and population projections should also be a key consideration, taking into account of migration and demographic change. (Para. 159).
- 2.8 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need. (Reference ID: 2a-015-20140306)

2.9 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

> The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

(Reference ID: 2a-015-20140306)

2.10 The Consultation on Proposed Changes to National Planning Policy (CPCNPP) (December, 2015) reaffirms the Government's commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.

iii) Duty to Co-operate

- 2.11 **The 'Duty to Co-operate' between LPAs is a clear requirement of** National planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to **'strategic priorities'** as set out in para. 156. (Para. 178).
- 2.12 In addition, para. 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged. (Para. 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-operate during the plan-making process. (Para. 181).

iv) Government guidance on Green Belt

2.13 In September 2012, the Communities Secretary of State issued a Ministerial Statement covering housing and growth. The Statement, amongst other matters, recognises the importance of protecting the Green Belt against urban sprawl whilst also acknowledging that LPAs can review local designations through plan-making, where appropriate to do so, to promote growth. The Statement notes that:

"We encourage councils to use the flexibilities set out in the National Planning Policy Framework to tailor the extent of Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered in reviewing or drawing up local plans, we will support councils to move quickly through the process by prioritising their Local Plan examinations... There is considerable previously developed land in many Green Belt areas, which could be put to more productive use. We encourage councils to make best use of this land, whilst protecting the openness of the Green Belt in line with the requirements in the National Planning Policy Framework."

2.14 The Government recognises that Green Belt reviews can support growth under local circumstances.

3.0 HOUSING

"Q.4 Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?"

- 3.1 We do not consider that the approach and conclusions derived from MCIOCD, assessing the housing needs calculated for Medway over the plan period have been appropriately assessed. We <u>do not</u> consider that the assessed housing need, as calculated by MC is "sound" and in line with National planning policy.
- 3.2 The NPPF directs LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of sites. (Para 159).
- 3.3 MC has jointly produced a North Kent SHENA (March 2015) with Gravesham Borough Council and a North Kent SHMA (November 2015).
- 3.4 The North Kent SHENA identifies the OAN for Medway as being 1,281 dwellings per annum (dpa) over the period <u>2012-2037</u> based on the result of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates. This level of housing need has been taken forward in MCIOCD to cover the period <u>2012-2035</u>.
- An assessment of MCs objectively assessed need housing figure has been carried out by Barton
 Willmore's Research Team and is included at Appendix 2.
- 3.6 The Report has been prepared in accordance with the requirements of the NPPF, to ensure that the Local Plan of each Local Planning Authority meets the full, objectively assessed needs for market and affordable housing in the housing market area.
- 3.7 In summary, the Report critiques the OAN of 1,281 dpa derived from MC and does not consider it to represent an accurate representation of the full OAN for Medway over the Plan period (2012 - 2035) for the following reasons:
 - There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dwellings per annum, 2012-2035;

- The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The North Kent SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are 'positively prepared' an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;
- The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very <u>minimum</u> projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;
- The North Kent SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The North Kent SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined above we believe to be inappropriate;
- The North Kent SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The North Kent SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The North Kent SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the North Kent SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The North Kent SHENA and MCIOCD identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the North Kent SHENA does not address the significant affordable housing need in Medway.

- 3.8 The MCIOCD identifies an OAN of 29,463 dwellings over the period 2012-2035. This figure is below the level of need identified by the CLG 2012-based household projections which identifies 30,429 dwellings over the same period. The PPG states that the CLG figure should be used as **the 'starting point' estimate of need. The 'starting point' usually requires adjustment to address** suppressed household formation and suppressed migration trends.
- 3.9 In addition, the CPCNPP indicates that CLG are intending to amend National planning policy to ensure appropriate action is taken where there is a significant shortfall between the homes provided for in Local Plans and the houses being constructed. A housing delivery test is proposed (as outlined in the Spending Review and Autumn Statement 2015) (HM Treasury, November 2015). It is envisaged that this approach would compare the number of homes that LPAs set out to deliver in their Local Plan against the net additions in housing supply within the LPA area. Consequently, LPAs shall have to ensure that OAN figures are suitably robust and achievable in line with current National planning policy and the emphasis that is being placed on delivery rates with the CPCNPP. (Para. 30).
- 3.10 The CPCNPP considers that continued significant under-delivery of housing, identified over a sustained period should be addressed by appropriate action. The CPCNPP considers that one approach to address under-delivery rates could be to identify additional sustainable sites if it has been shown that the existing approach is not delivering the housing required. Such sites would need to be in sustainable locations, with appropriate infrastructure available and which can be demonstrated as deliverable. To deliver such an approach, it is recognised that collaboration between developers and local communities, undertaking appropriate consultations would be required to undertake policy reviews, enabling additional land in sustainable locations to come forward. (Paras. 31 33).
- 3.11 Overall, it is considered that the MCIOCD does not seek to meet the Full OAN for Medway which is considered to be in the region of **1,489dpa**. This matter should be addressed in the next iteration of the Local Plan as the current position is considered to be unsound.

"Q.5 What do you consider to be the appropriate housing market area for Medway?"

- 3.12 The SHMA (November 2015) defines the Housing Market Area to comprise Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling.
- 3.13 MC should seek to work collaboratively under the 'Duty to Co-operate' to address the housing needs of neighbouring authorities and how housing can be delivered in part of the HMA that are influenced by neighbouring Districts.

"Q.6 Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?"

- 3.14 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012 2037), the Local Plan period (2012 2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744dpa), which would constitute 58% of MC's identified OAN figure of 1,281dpa. The PPG advises that an increase in the total Local Plan housing figure should be considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).
- 3.15 The need for affordable housing nevertheless, should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in planmaking and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."* (Para. 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing when taking account of the normal cost of development and mitigation, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 3.16 We would consider that in light of the highlighted need for affordable housing provision as identified in the North Kent SHMA (November 2015), seeking the provision of up to 25% affordable housing is appropriate.

Q.7 – 14 – No comments

4.0 RURAL ISSUES

Q. 38 -39 - No comment.

"Q.40 How should the Local Plan address the need to maintain and improve access to services in rural areas?"

4.1 It is acknowledged that rural areas face a number of challenges including accessibility to services. We consider that new development within rural areas should provide some form of contribution to maintaining and improving rural areas, where appropriate. The LPA should identify services in rural areas that are in need of improvement in order to facilitate future development needs.

"Q.41 What consideration should be given to strategic infrastructure and development in rural Medway?"

- 4.2 The PPG recognises that **"A thriving rural community in a living, working countryside depends,** in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities." (Reference ID: 50-001-20140306)
- 4.3 Improving strategic infrastructure and development in rural Medway is considered to be vital to support sustainable rural communities. Development in rural areas faces a number of barriers which are either unique to rural locations or experienced to a greater extent than development in other areas of Kent and Medway. Emerging local planning policy should ensure that the ongoing viability of rural areas is maintained with the provision of sufficient infrastructure including public transport and educational facilities to support future growth.
- 4.4 We consider that MC should work closely with key stakeholders to develop appropriate policy to support the vitality of rural areas.
- 4.5 The Department for Environment Food & Rural Affairs published The Rural Productivity Plan (RPP) in August 2015. Amongst other matters, it highlights the Government's intention to provide more housing in rural areas. The Plan notes that "through the right combination of measures, the government wants to ensure that any village in England has the freedom to expand in an incremental way, subject to local agreement." (Pg 6)

4.6 This indicates that strong local policy support for the location of new development and related infrastructure should be provided in line with Government guidance and within the context of the identified local requirement.

"Q 42 How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?"

- 4.7 Delivery of new homes within rural areas of Kent and Medway presents a further challenge. Historically, assessment of housing need in rural areas has been identified by MC as a key issue and MC has previously identified localised needs through parish Housing Need Surveys, undertaken by the Kent rural housing enabler. Where local needs are identified, this leads to a process of identifying land to deliver affordable rural housing. But there are significant issues with delivery and the costs involved tend to be higher than development in other areas.
- 4.8 The Site, in conjunction with the development at St. Andrew's Park, would offer a mix of uses, supporting the residential development on the Site and benefiting the wider area. Furthermore, the St. Andrew's development will provide a range of community infrastructure facilities, supporting a thriving rural community. The development would also serve to meet the needs of other housing market areas, supporting MCs 'duty to co-operate' with neighbouring LPAs.
- 4.9 The RPP states that "the government will make it easier for villages to establish neighbourhood plans and allocate land for new homes, including the use of rural exception sites to deliver Starter Homes." (Para. 8)
- 4.10 In February 2016, Government issued a Rural Planning Review: Call for Evidence (RPRCFE) following on from the RPP. It recognises the importance of ensuring the sustainability of rural areas and sets out to investigate evidence in practice regarding the effectiveness of the current planning system for businesses in the rural context.
- 4.11 Both the RPP and RPRCFE set out the Government's intention to promote sustainable growth and ensure the viability of rural areas.

5.0 DELIVERABILITY

Q.76, 78 – 79 – No comment

"Q.77 Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?"

- 5.1 We consider that it is appropriate to set different rates of affordable housing and CIL contributions to take into account differing viability between areas of Medway.
- 5.2 The NPPF recognises that due consideration to viability and costs in plan-making and decisiontaking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."* (Para. 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing when taking account of the normal cost of development and mitigation, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

6.0 DEVELOPMENT STRATEGY – OVERARCHING

Q.80, 83, 85 – 87 – No comment.

"Q.81 Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?"

- 6.1 We consider that a range of development types, as outlined within MCIOCD should utilised in **meeting Medway's growth requirements. This should be based on an overarching vision of** sustainable development, as underpinned by National and Local planning policy. When selecting development types, it is important to consider the aspirations of National and Local policy.
- 6.2 The NPPF encourages LPAs in plan-making to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Whilst planning for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, LPAs should identify the range of housing that is required in particular locations. (Para. 50).
- 6.3 Furthermore, we refer to our Clients Site located in Halling, which is classified as a rural area within the settlement hierarchy. National policy supports sustainable development in rural areas, encouraging housing to be located where it will enhance or maintain the vitality of rural communities. Additionally, the NPPF directs that LPAs should be responsive to local circumstances and plan housing development to reflect local needs. (Para. 54 55).
- 6.4 The CPCNPP considers that "*building new homes on small sites, whether in rural or urban locations, can deliver a range of economic and social benefits.*" Amongst other matters, this includes creating local jobs and sustaining local growth, particularly in rural areas and making effective use of developable land. (Para. 23).

7.0 DEVELOPMENT STRATEGY – GREEN BELT REVIEW

"Q.84 Should the green belt boundary be reviewed?"

- 7.1 We would support a review of the Green Belt boundary to assess the development potential of land that does not meet the five purposes of the Green Belt as set out in the NPPF. This is especially in the light of the required housing numbers.
- 7.2 The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. There are five key purposes of the Green Belt, including: -
 - to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. (Paras 79-80)
- 7.3 The NPPF considers that LPAs with Green Belts in their area should establish Green Belt boundaries in their Local Plans, setting the framework for Green Belt and settlement policy. It is recognised that Green Belt boundaries that have been established should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. LPAs should take a long term view of the permanence of Green Belt boundaries beyond the plan period.
- 7.4 The NPPF states that LPAs should take into account the need to promote sustainable patterns of development when reviewing Green Belt boundaries. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Inappropriate development within the Green Belt is considered harmful and should not be approved except in very special circumstances. This includes the construction of buildings unless they meet certain criteria which do not have a harmful impact on the openness of the Green Belt. (Paras. 79 - 92)

- 7.5 As previously stated, our Client is promoting the release of the Site from the Green Belt with the potential to develop the southern section of the Site for residential development (as shown on **Appendix 1**). It is intended that a 'green wedge' could be created to the northern section, maintaining a separation between the settlement boundaries of Halling and North Halling. A Landscape Appraisal and Green Belt Review has been carried out by Barton Willmore's Landscape Team and is included at **Appendix 3**. The Report provides a Landscape and Visual **Appraisal of the Site to assess the Site's contribution to the purposes of** the Green Belt, in-line with National and Local planning policy.
- 7.6 The Site is set within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is bounded by residential properties to the north, west and south, with Formby Road located adjacent to the east of the Site. It is acknowledged that the Site is within the Green Belt, however, it is not subject to any other landscape-related or planning policy designations.
- 7.7 A small localised release of Green Belt land is proposed and allocation for residential development on part of the Site.
- 7.8 A Visual Appraisal of the Site was undertaken which demonstrates that the Site is "*partially* visible from its immediate surroundings, however, views are typically filtered by intervening vegetation. More open views into the Site are obtained from land to the east of the River Medway, however, where these views are obtained, the Site is seen in an urbanised context of the lower slopes of the Medway Valley, beyond which land rises to form a predominantly wooded backdrop to the views." (Para. 8.6).
- 7.9 The review of the Green Belt functions of the Site, as set out in the NPPF, indicates that "the Site makes no contribution to checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns; makes a limited contribution to assisting in safeguarding the countryside from encroachment; and would not prejudice derelict land coming forward in future for development." (Para. 8.8). In this case, we would consider that a localised review of the Green Belt is wholly justified bearing in mind the analysis of the merits of Green Belt functions as set out in the NPPF.
- 7.10 The Report concludes that releasing land from the Green Belt in this area would not cause any significant harm to Green Belt purposes and serve to rationalise the Green Belt boundary. Furthermore, by undertaking a Landscape and Visual Appraisal of the Site, the Report concludes that sympathetic development within the Site would be acceptable in landscape and visual terms and would result in limited to no effect on the function of the Green Belt.

8.0 OPEN SPACE

Q.49 -52, 53 - No comment.

"Q.52 Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?"

8.1 We consider that open space provision for new development should take a balance between the two approaches. The provision of on-site open space should be considered within the context of each development site, assessing the potential feasibility of a development site to provide for on-site open space provision or whether contributions towards maintaining and enhancing the existing estate is deemed more appropriate.

9.0 ENVIRONMENT

"Q.30 What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?"

- 9.1 We would consider that one of the ways in which MC could strike a balance between securing **and strengthening Medway's environment and addressing the area's development needs would** be to review those areas of land within Medway that do not serve the functions of the Green Belt as outlined with the NPPF (para. 80) and that do not have a detrimental impact on the environment.
- 9.2 This would prioritise sustainable development on appropriate land throughout Medway and can include Green Belt land as this may have benefits over other environmentally sensitive designations.
- 9.3 In this instance, a localised review of the Green Belt for the Site is considered to fulfil this sustainability credential.

Q.31 – 32 – No comment

10.0 SITE SUITABILITY

10.1 The Site was put forward to MC's 'call for sites' Strategic Land Availability Assessment in May 2014. The SLAA sets out to identify sites with development potential and the methodology undertaken enabled MC to carry out Stage 1 (Site Identification) and Stage 2 (Site Assessment) of the Planning Policy Guidance methodology. As part of the Stage 1 process, a number of sites were excluded for further assessment if they were constrained by a range of restrictive designations as identified within the NPPF (Footnote 9). This included sites within the Green Belt, resulting in North Field, Halling being one such site which was excluded and deemed unsuitable for development due to its Green Belt designation.

10.2 The SLAA recognises that;

"given the scale of development needs that Council must accommodate over the Plan Period, it was considered appropriate and robust that Green Belt land should be subject to detailed assessment at stage 2. However, whilst Green Belt land has been assessed at stage 2, this does not comprise a Green Belt Review. The Council intends to undertake a Green Belt review separately as part of the Local Plan evidence base; this will specifically consider whether land performs Green Belt functions and meets Green Belt purposes, rather than simply whether a site is suitable for development." (2015;13)

- 10.3 We would consider it appropriate that when such a review of the Green Belt is undertaken to meet OAN requirements, the SLAA would be updated to reflect this changing circumstance.
- 10.4 We consider that the Site is suitable for localised Green Belt release and demonstrates potential for development. Currently, the whole Site lies within designated Green Belt land and we consider that a robust case has been made to release the Site from the Green Belt, creating a logical extension of St Andrews Park as well as establishing a green wedge between the settlements, maintaining their separation.
- 10.5 The Site is located within a sustainable location, adjacent to the St. Andrew's Park development which will deliver a range of infrastructure and services. The Site is accessible, located adjacent to the local road network with access proposed directly onto the A228 and also served by local bus routes. Furthermore, the Site is located in close proximity to the strategic highway network and railway with the M2 located approximately 1 mile to the north of the Site and Halling railway station approximately 850 metres to the south of the Site. Pedestrian access to the railway station will be via the pedestrian footbridge, delivered as part of the St. Andrew's Park development.

- 10.6 The development would meet the three elements of sustainable development, as set out in the NPPF (para 7). Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has deliverable potential to contribute towards much needed housing within rural Medway and would deliver a mix of housing types, including an element of affordable housing.
- 10.7 The proposed provision of a green wedge to the northern part of the Site would enable further ecological enhancements, as well as landscaping delivered in line with potential development of the Site.
- 10.8 **The Site is considered 'deliverable' in that it meets the requirements of footnote 11 of the** NPPF and it has been demonstrated that the Site currently available for development, will offer a suitable location for development and has a realistic prospect of housing being delivered on the Site within five years and that development of the Site is viable.

11.0 CONCLUSIONS

- 11.1 These representations are submitted on behalf of Redrow Homes who has a direct interest in the Local Plan and the long-term development strategy for Medway.
- 11.2 These representations focus on promoting Redrow Homes' site known as 'The North Field, Halling'. The Site forms part of the wider St. Andrew's Park Development which is currently being built out by Redrow Homes. The Site currently lies within the Green Belt.
- 11.3 The representations are supported by technical reports in respect of Objectively Assessed Needs and a Green Belt review.
- 11.4 We <u>do not</u> consider that the OAN target of 1,281dpa is sound. It falls short of the starting point estimate and once other factors are taken into consideration, could be as high as 1,489dpa. This matter should be addressed during the next iteration of the Local Plan and ensure that there are sufficient housing sites allocated to meet the Full OAN.
- 11.5 We consider the site is suitable to be released from the Green Belt under a localised Green Belt review in this location. It would form a logical extension to the under construction St Andrews Park and would maintain separation between Halling and North Halling. Furthermore, development in this location would serve to deliver houses in this rural part of Medway that has other Housing Market Area influences upon it (from Tonbridge and Malling and Maidstone).
- 11.6 In addition to the above, we have responded to specific questions. A summary of responses is set out in Table 11.1 below.

Housing			
"Q.4 Do you agree with the approach and	We do not agree with the approach and		
conclusions of the assessment of housing	conclusions of the assessment of housing needs		
needs calculated for Medway over the plan	calculated for Medway over the plan period and		
period?"	consider that this has not been appropriately		
	assessed. This is based on the conclusions		
	derived from the BW report which indicates that		
	the OAN of 1,281 dpa derived from MC is not		
	considered to represent an accurate		
	representation of the full OAN for Medway over		
	the Plan period (2012 - 2035).		

Table 11.1 Summary of Reponses to Specific Questions.

"Q.5 What do you consider to be the	We do not outline specific housing market areas
appropriate housing market area for	for Medway that would be considered
Medway?"	appropriate but instead wish to highlight that
	rural parts of Medway (including the Site) have
	an influence on other housing market areas such
	as Tonbridge & Malling and Maidstone and
	therefore these housing market needs should be
	suitably addressed under the 'duty to co-
	operate'.
"Q.6 Do you agree that 25% is an	We would consider that in light of the highlighted
appropriate level for the requirement of	need for affordable housing provision that the
affordable housing, and what threshold	suggested provision of affordable housing (25%)
should be set for the scale of development	is appropriate.
that needs to provide affordable housing?"	
Environment	
"Q.30 What are the most effective means to	We would consider that one of the ways in which
secure and strengthen Medway's	MC would strike a balance between securing and
environment, in the context of the area's	strengthening Medway's environment and
development needs?"	addressing the area's development needs would
	be to review those areas of land within Medway
	that do not serve the functions of the Green Belt
	as outlined in the NPPF and do not have a
	detrimental impact on the environment.
Rural Issues	
"Q.40 How should the Local Plan address	We consider that the Local Plan should
the need to maintain and improve access to	specifically address the need to maintain and
services in rural areas?"	improve access to services in rural areas and
	identify such services to support the continued
	viability of such areas. Contributions to address
	such identified need, where appropriate, should
	be sought from development.
"Q.41 What consideration should be given	We consider that the need for strategic
to strategic infrastructure and	infrastructure and development should be
development in rural Medway?"	appropriately assessed in relation to local needs
	Emerging local planning policy should ensure
	that the opening viability of rural areas is
	that the ongoing viability of rural areas is

We consider that MC should work closely with
key stakeholders, including Neighbourhood Plan
creating bodies to develop appropriate policy to
support the vitality of rural areas.
We consider that open space provision should
take a balance between the two approaches,
based on individual site context.
We consider that it is appropriate to set different
rates of affordable housing and CIL contributions
to take into account differing viability areas
within Medway.
We consider that a range of development types
should be utilised in meeting Medway's growth
requirements, based on the local context.
We would support a review of the Green Belt
boundary to assess the development potential of
land that does not meet the five purposes of the
Green Belt as set out in the NPPF, especially in
the light of meeting increased housing numbers.

11.6 In the light of the above, we consider that the Site represents a suitable location for future allocation that has been appropriately tested and subjected to a Green Belt review as the Local Plan advances.

Appendix 1

North Field, Halling Site Location Plan



Appendix 2

Objective Assessment of Housing Need: Critical Review (Barton Willmore, February 2016)

MEDWAY COUNCIL

OBJECTIVE ASSESSMENT OF HOUSING NEED

CRITICAL REVIEW

Prepared on behalf of Redrow Homes (South East)

February 2016



MEDWAY COUNCIL

OBJECTIVE ASSESSMENT OF HOUSING NEED

CRITICAL REVIEW

Prepared on behalf of Redrow Homes (South East)

February 2016

Project Ref:	23486/A5/DU/DM
Status:	Final
Issue/Rev:	02
Date:	29 February 2016
Prepared by:	DM DU
Checked by:	DU DM
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Ref: 23486/A5/DU/DM/kf Date: 29 February 2016

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1.0 INTRODUCTION

- 1.1 This Technical Note has been prepared by Barton Willmore on behalf of Redrow Homes (South East), in order to review the Objectively Assessed Housing Need (OAN) determined for Medway Council as set out in the Council's Strategic Housing and Economic Needs Assessment (SHENA). The SHENA has been prepared in partnership with Gravesham Borough Council, however in this review we focus on the OAN for Medway only.
- 1.2 The review presented here has been undertaken in the context of the policies of the National Planning Policy Framework (NPPF) and the supporting Planning Practice Guidance (PPG) requirements that a full, unconstrained OAN is prepared.
- 1.3 The review is structured as follows:

Section 2 provides an outline of the relevant National Planning Policy Framework (NPPF), the supporting Planning Practice Guidance (PPG), and Local Planning Policy.

Section 3 reviews the latest official demographic evidence for Medway, including:

- Latest ONS population and CLG household projections;
- ONS mid-year population estimates and past migration trends.

Section 4 provides a review of the SHENA in the context of the requirements of PPG's Housing and Economic Development Needs Assessment guidance (ID2a).

Section 5 summarises our critique of the SHENA to recommend an appropriate way forward in assessing overall housing need for Medway.

2.0 PLANNING POLICY CONTEXT

A) NATIONAL PLANNING POLICY

i) Introduction

2.1 The National Planning Policy Framework (NPPF, 27 March 2012) and the accompanying Planning Practice Guidance (PPG, 06 March 2014) set out the requirements within which local planning authorities should be setting their overall housing targets as part of a full objective assessment of overall need. These requirements are <u>summarised</u> below.

ii) National Planning Policy Framework (27 March 2012)

- 2.2 NPPF sets out the Government's planning policies for England and how these are expected to be applied. NPPF states that planning should proactively drive and support sustainable economic development to deliver the homes that the Country needs, and that every effort should be made to objectively identify and then meet housing needs, taking account of market signals (paragraph 17).
- 2.3 In respect of delivering a wide choice of high quality homes, NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).
- 2.4 Furthermore, it states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (paragraph 50).
- 2.5 With regard to plan-making, local planning authorities are directed to set out strategic priorities for their area in the Local Plan, including policies to deliver the homes and jobs needed in the area (paragraph 156).
- 2.6 NPPF states that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework (paragraph 157).
- 2.7 Further, Local Plans are to be based on adequate, up to date and relevant evidence, integrating assessments of and strategies for housing and employment uses, taking full account of relevant market and economic signals (paragraph 158).

2.8 For plan-making purposes, local planning authorities are required to clearly understand housing needs in their area. To do so they should:

"prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries; The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

meets household and population projections, taking account of migration and demographic change;

addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)."¹

iii) Planning Practice Guidance (PPG, 06 March 2014)

- 2.9 PPG was issued as a web based resource on 6th March 2014. Guidance on the assessment of housing development needs (PPG ID: 2a) includes the SHMA requirement set out in NPPF and supersedes all previous published SHMA practice guidance (CLG, 2007).
- 2.10 The primary objective of the housing development needs assessment (the SHMA) is to identify the future quantity of housing needed, including a breakdown by type, tenure and need (PPG ID2a 002)
- 2.11 Housing need refers to the scale of housing likely to be needed in the housing market area over the plan period, should cater for the housing demand in the area and identify the scale of housing supply necessary to meet that demand. (PPG ID2a 003)
- 2.12 The assessment of need is an objective assessment based on facts and unbiased evidence and constraints should not be applied (PPG ID2a 004).
- 2.13 Use of the PPG methodology for assessing housing need is strongly recommended, to ensure that the assessment is transparent (ID2a 005). The area assessed should be the housing market area (ID2a 008), reflecting the key functional linkages between places where people live and work (ID2a 010).

¹ Paragraph 159, National Planning Policy Framework, 27 March 2012;

PPG methodology for assessing housing need

2.14 The full methodology is set out at ID 2a 014 to 029 (<u>overall</u> housing need at ID2a 015 to 020), and is introduced as an assessment that should be based predominately on secondary data (ID2a 014).

Starting point estimate of need

2.15 The methodology states that the starting point for assessing <u>overall</u> housing need should be the household projections published by the Department for Communities and Local Government, but that they are trends based and may require adjustment to reflect factors, such as unmet or supressed need, not captured in past trends (ID2a 015).

> "The household projection-based estimate of housing need <u>may</u> <u>require adjustment</u> to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed <u>historically by under-supply and worsening affordability of</u> <u>housing</u>." (2a-015) (Our emphasis)

Adjusting for demographic evidence

2.16 The PPG methodology advises that plan makers may consider testing alternative assumptions in relation to the underlying demographic projections and household formation rates. It also states that 'account should be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates' (2a-017).

Adjusting for likely change in job numbers

2.17 In addition to taking into account demographic evidence the methodology states that job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).

> "Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns ... and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems." (2a-018)
2.18 The PPG also confirms the importance of ensuring sufficient growth in the working age population (16-64), at paragraph 2a-018 and 2a-21:

"Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the <u>growth of the working</u> <u>age population</u> in the housing market area." (2a-018)

"When considering future need for different types of housing, plan makers will need to consider whether they plan to attract a different age profile e.g. increasing the number of <u>working age</u> <u>people</u>." (2a-021)

Adjusting for market signals

2.19 The final part of the methodology regarding overall housing need is concerned with <u>market</u> signals and their implications for housing supply (2a-019:020).

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings." (2a-019)

2.20 Assessment of market signals is a further test intended to inform whether the starting point estimate of overall housing need (the household projections) should be adjusted upwards. Particular attention is given to the issue of affordability (2a-020).

"The more significant the affordability constraints ... and the stronger other indicators of high demand ... the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be." (2a-020)

Overall housing need

- 2.21 An objective assessment of overall housing need can be summarised as a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b) the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.
- 2.22 The extent of any adjustment should be based on the extent to which it passes each test. That is:
 - It will at least equal the housing need number implied by the latest demographic evidence,
 - It will at least accommodate projected job demand; and,
 - On reasonable assumptions, it could be expected to improve affordability.

Affordable housing need assessment

2.23 The methodology for assessing affordable housing need is set out at 2a-022 to 029 and is largely unchanged from the methodology it supersedes (SHMA 2007). In summary, total affordable need is estimated by subtracting total available stock from total gross need. Whilst it has no bearing on the assessment of overall housing need, delivering the required number of affordable homes can be used to justify an increase in planned housing supply (2a-029).

"The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments ... <u>An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes</u>." (2a-029) (our emphasis)

B) LOCAL PLANNING POLICY

i) Medway Council Local Plan – Issues and Options 2012-2035 (January 2016)

- 2.24 The Medway Council Local Plan Issues and Options Plan (draft Plan) represents the first formal stage of the Local Plan process, and sets out a strategy for development in Medway up to 2035.
- 2.25 In respect of the OAN for Medway, the Plan states the following:

"The Government requires Local Planning Authorities to determine the objectively assessed needs (OAN) for housing in their strategic housing market areas. Work carried out for the North Kent Strategic Housing and Economic Needs Assessment (SHENA) in 2015 has analysed demographic, economic and market signal information to assess the quantity and types of housing that will be needed to meet the projected growth in households over the plan period. This concludes that the Local Plan needs to make provision for up to 29,463 new homes by 2035."²

- 2.26 The OAN determined by the Strategic Housing and Economic Needs Assessment (SHENA) equates to <u>1,281 dwellings per annum</u> over the period 2012-2037, not the plan period (2012-2035). The Plan states how the Council is committed to planning positively to meet the development needs of Medway.
- 2.27 The study Barton Willmore presents here provides a full critique of the SHENA to evaluate whether the OAN is positively prepared in line with the requirement of the NPPF.

² Paragraph 7.8, page 21, Medway Council Issues and Options Consultation Document, January 2016

- 2.28 The Issues and Options Plan also identifies Medway as a major economic hub within the South East region and Medway's location within the Thames Gateway offers excellent opportunities to stimulate business growth.
- 2.29 A key issue for the Local Plan will be:

"To secure a successful economic base in Medway, providing a range of jobs for residents and securing sustainable growth without exacerbating the need to travel to access high quality job opportunities."³

2.30 Furthermore, the Issues and Options Plan outlines the scale of economic growth forecast for Medway as follows:

"To forecast the scale and nature of economic growth anticipated in Medway over the plan period, calculations have been carried out based on an assessment of the population growth projections, the strengths of the local economic, knowledge of growth sectors, and impacts of major strategic developments such as London Paramount. The research has forecast a growth of around 17,200 new jobs in Medway up to 2037. Over half of these jobs are expected in non-B class activities, such as retail and healthcare."⁴

C) SUMMARY

- 2.31 The NPPF and PPG requires that in planning for future levels of housing, local authorities should boost significantly the supply of housing in their area that meets in full, the objectively assessed need for market and affordable housing. In doing so local authorities should;
 - identify a scale of housing that meets household and population projections;
 - account for migration and demographic change in formulating housing requirements;
 - ensure that assessment of, and strategies for, housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals; and
 - work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing.

³ Paragraph 8.18, page 32, Medway Council Issues and Options Consultation Document, January 2016

⁴ Paragraph 8.19, page 32, Medway Council Issues and Options Consultation Document, January 2016

2.32 The following sections of this report provide an analysis of the starting point in objectively assessing overall housing need according to PPG – official ONS and CLG projections and estimates – and a full review of the SHENA and the OAN it determines for Medway. This will enable us to reach a conclusion as to whether the SHENA provides for full OAN.

3.0 HOUSEHOLD DEMOGRAPHICS

- 3.1 The PPG advises that the starting point for estimating overall housing need should be the latest household projections produced by the Department for Communities and Local Government (CLG) and that account should be taken of the most recent demographic evidence, including Office for National Statistics (ONS) population estimates.
- 3.2 This section reviews the latest official ONS demographic and CLG household data for Medway. Comparisons are made alongside the South East region and the national average.
- 3.3 To align with the assessment of housing need in the Council's draft Plan and the SHENA, we provide our analysis in this section (where possible) based on the 23-year period 2012-2035.

i) Historic population growth – ONS Mid-Year Population Estimates

3.4 Medway is currently estimated to have a population of 274,000 according to the ONS 2014 Mid-Year Population Estimates. Since 2001 Medway's population has grown by 24,300 which is equivalent to a rate of 9.7%. Medway's rate of population growth is slightly lower than the national average (9.8%) and lower than the regional average (10.6%) as shown in Table 3.1.

			2001-2014 change	
	2001	2014	No.	%
Medway	249,700	274,000	24,300	9.7%
South East	8,023,400	8,873,800	850,400	10.6%
England	49,449,700	54,316,600	4,866,900	9.8%

Table 3.1: Historic population change (2001-2014)

Source: Mid-Year Population Estimates, Office for National Statistics All figures have been individually rounded to the nearest one hundred and may not sum Percentages have been calculated using unrounded numbers

3.5 Population changes as a result of net migration and natural change. Table 3.2 provides the detailed components of change for Medway.

	Natural change	Net Migration	Other changes	Total change		
2001/02	879	-250	-71	558		
2002/03	1046	-270	121	897		
2003/04	988	-782	94	300		
2004/05	1,030	-691	300	639		
2005/06	1,033	115	232	1,380		
2006/07	1,247	969	130	2,346		
2007/08	1,304	998	98	2,400		
2008/09	1,383	374	249	2,006		
2009/10	1,450	776	282	2,508		
2010/11	1,539	652	-44	2,147		
2011/12	1,546	1,793	-6	3,333		
2012/13	1,452	1,280	155	2,887		
2013/14	1,510	1,296	104	2,910		
Average 2001/14	1,262	482	126	1,870		
Average 2007/12	1,444	919	116	2,479		
Average 2009/14	1,499	1,159	98	2,757		
Average 2004/14	1,349	756	150	2,256		

Table 3.2: Components of population change – Medway

Source: Mid-Year Population Estimates, Office for National Statistics

- 3.6 At the start of the decade Medway experienced net outward migration. However, since 2005 net migration to Medway has been positive meaning that more people have moved to Medway than moved out.
- 3.7 Medway has also experienced positive natural change (more births than deaths) which has increased between 2001 and 2014. In addition there is positive 'other' change (change that is not possible to identify as either migration or natural change) equating to 1,640 people, or an average of 130 people per annum over the period 2001-2014.
- 3.8 Over the period 2001 and 2014, population change in Medway has largely been as a result of natural change (67%). However more recent trends reflect a shift in the components of population change as a result of net migration increasing considerably since 2011.

3.9 Medway has a younger age profile than the regional and national averages, with a larger proportion of the population aged 0-15 years and 16-64 years, as shown in Figure 3.1.





Source: 2011 Census

ii) Office for National Statistics (ONS) population projections

- 3.10 The ONS produces population projections for all local authority areas in England. These are referred to as the Sub National Population Projections (SNPP) and are published by the ONS usually every two years.
- 3.11 The ONS SNPP are trend-based projections. That is, they project forward past demographic trends in births, deaths and migration. They do not take account of any future changes to government policy which may affect these past trends.
- 3.12 Table 3.3 sets out the official ONS SNPP in chronological order from the 2008-based series to the most recent 2012-based SNPP (29 May 2014). The 'interim' 2011-based SNPP and 2012-based SNPP take account of findings from the 2011 Census of the population. Growth is considered over the period 2012-2033 (2008-based) and 2012-2037 (2012-based). However, in line with the Medway Plan period, growth has also been considered over the period 2012-2035. The shorter period presented in respect of the 2008-based series is due to the projections finishing in 2033.

Series	2012	2021	2033/35	2037	2012-21 (per annum)	2012- 33/35 (per annum)	2012-37 (per annum)
2012- based	268,200	290,500	322,700*	326,800	22,300 (2,480)	54,500 (2,370)	58,600 (2,340)
2011- based (interim)	267,300	290,300			23,000 (2,560)		
2008- based	257,600	269,700	286,300**		12,100 (1,340)	28,700 (1,370)	

Table 3.3: ONS Population Projection series for Medway

Source: Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding *2035; **2033.

- 3.13 The latest 2012-based SNPP project <u>significantly higher</u> population growth than the previous full 25-year projection series (the 2008-based SNPP) and marginally higher growth than the interim 2011-based series. This is expected given the analysis presented earlier in this chapter which shows net migration to Medway increasing in recent years.
- 3.14 Despite the 2012-based SNPP projecting the highest population growth, it is important to note that the 2012-based SNPP are underpinned by trends captured over the 2007-2012 period. This period was characterised by an economic recession and for this reason, resulted in atypical migration trends in <u>some</u> areas.
- 3.15 From reference to the 2012-based ONS SNPP components of change, the 2012-based ONS SNPP is underpinned by average net in-migration of 840 people per annum, 2012-2035. However, analysis of net migration trends from the period 2007-2012 from which the 2012-based SNPP trends are drawn puts average net migration at 919 people per annum. This compares to the most recent long-term trend (2004/5-2013/14) of 760 people per annum and the most recent 5-year trend (2009/10-2013/14) of 1,160 people per annum.
- 3.16 The analysis of migration trends for Medway therefore suggests a short-term trend in Medway is a prudent base from which to plan. However, whilst the most recent 5-year migration trend suggests higher net migration to Medway (largely influenced by the three most recent years) than the 2012-based SNPP, it is not possible to say with any certainty whether Medway will see a continued rise in migration. On this basis, the 2012-based SNPP are considered to provide a reasonable demographic projection for Medway.
- **3.17** However, the 2012-based SNPP are considered to represent the very <u>minimum</u> of future population growth in Medway given the 2012-based SNPP are considered to be conservative due to the national projections which underpin them. The 2012-based SNPP are constrained to the 2012 National Projections published in 2013. The national projection is based on an

assumption of 165,000 net international migrants coming into the UK per annum, and this assumption is projected forward per annum over the full 25 years of the 2012-based SNPP period. However net international migration of 165,000 people per annum conflicts significantly with the latest migration statistics report by the ONS, which shows net international migration of 336,000 people in the year ending June 2015, over double the 2012-based SNPP based SNPP assumption.

- 3.18 The ONS appear to have noted this significant increase in net international migration, recently publishing the 2014 National Projections and assuming 185,000 net international migrants per annum. However this remains significantly lower than has been seen in the recent past. Although the forthcoming 2014-based ONS SNPP (expected May 2016) will project higher population growth across the country on the basis of these revised 2014-based National Projections, the assumption of 185,000 net international migrants per annum remains a very conservative estimate on the basis of recently recorded trends.
- 3.19 In this context the 2012-based SNPP are considered to be underpinned by assumptions which lead to a minimum level of population growth over the Plan period (2012-2035). Therefore the projected population growth presented in Table 3.3 is very likely to be conservative given that Medway is historically a net receiver of international migrants.
- 3.20 It is important to be aware of the issues related to the SNPP because the CLG household projections underpinned by the 2012-based SNPP. The household projections are derived by applying household representative rates to the ONS population projections. Household projections will be discussed in the next section.
- 3.21 The 2012-based ONS SNPP project the working age population to grow at a much slower rate than the population as a whole as is shown in Table 3.4. Given the extension of State Pension Age, there will be an increasing number of people working beyond the age of 64 years and therefore it is also important to consider the projected growth of the 65-74 year old population.

Age Group	Medway		
16-64	18,050 (10.3%)		
65-74	11,900 (53.5%)		
Total (16-74 years)	29,950 (15.2%)		
Total (all ages)	57,800 (21.8%)		

Table 3.4: Working Age Population Change, 2012-2035

Source: 2012-based SNPP, Office for National Statistics (rounded to nearest 100) Note: Figures may not sum due to rounding. Percentages calculated using unrounded numbers.

- 3.22 It is evident from Table 3.4 that the growth in the working age population (16-74 years) in Medway is heavily driven by the growth in the population aged 65-74 years (53.5% growth). Realistic assumptions need to be applied as to how greatly people over the age of 65 years can contribute to the resident labour force.
- 3.23 The PPG states 'where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns' (PPG, ID2a, 018). Whilst the 2012-based SNPP do project an increase in the working age population in Medway, further work is required in order to determine whether the level of workforce growth is sufficient to support the projected level of job growth.

iii) Communities and Local Government (CLG) household projections

3.24 Table 3.5 sets out the official CLG household projections in chronological order from the 2008based series to the most recent 2012-based series (27 February 2015).

Series	2012	2021	2033/35	2037	2012-21 (per annum)	2012-33/35 (per annum)	2012-37 (per annum)
2012- based	108,190	120,470	137,640*	139,950	12,280 (1,360)	29,450 (1,280)	31,760 (1,270)
2011- based (interim)	107,970	119,320			11,350 (1,260)		
2008- based	107,470	116,090	125,890**		8,620 (960)	18,420 (880)	

Table 3.5: CLG Household Projections for Medway

Source: (CLG) Communities and Local Government (rounded to nearest 100) Note: Figures may not sum due to rounding *2035; **2033

- 3.25 As the PPG states the CLG projections should form the 'starting point estimate' only of overall housing need as part of a full objective assessment of need. The latest CLG 2012-based <u>household</u> projections show growth of 1,280 households per annum in Medway over the Plan period (2012 and 2035). To reach a <u>dwelling</u> requirement, account needs to be taken of vacant and second homes. For Medway this rate is 3.27%⁵ resulting in a dwelling projection of <u>1,323 dwellings per annum</u>, 2012 to 2035.
- 3.26 The growth projected by the CLG 2012-based household projections is higher than the growth projected by the previous two series of household projections (the 'interim' 2011 and 2008-based series), but this is expected given the 2012-based SNPP projected higher population growth than the other two series.

⁵ CLG, CTB 2014 (Second Homes); CLG Live Table 125/615 (Vacant)

- 3.27 However, like the 2012-based SNPP, the 2012-based household projections are also underpinned by recessionary trends in relation to household formation, whereas the 2008-based projections are underpinned by trends gathered prior to the recession and are therefore higher in terms of projected household formation, particularly in younger age groups.
- 3.28 The CLG have published household formation data for the 2012-based household projections (household formations rates by age and gender). The rates show that household formation in the 2012-based projection still projects a declining household formation rate trend in the 25-34 and 35-44 age groups (see Figure 3.2 below) when compared with the interim 2011-based and 2008-based projections.
- 3.29 The interim 2011-based household projections were widely regarded to project forward very low household formation in younger age groups. This was due to the trends underpinning the projections covering the period just prior to and including the recessionary period, when housing became rapidly less affordable for people in the younger age groups due to a lack of supply.
- 3.30 Figure 3.2 illustrates that the 2012-based rates for Medway follow a similar trajectory to that of the interim 2011-based projections before them. After 2025 the 2012-based projection shows a declining trend which results in the gap between the 2008 and 2012-based rates increasing, and suppression in the 2012-based rate worsening.





Source: CLG

- 3.31 The trend for declining household formation in the 25-44 age group is likely to be caused in part by worsening affordability. Planning for housing on the basis of a continuation of these suppressed household formation rates is not supported by PPG which recommends adjustments to households formation rates to reflect factors not captured in past trends (ID 2a-015).
- 3.32 Furthermore, planning on the basis of the 2012-based household formation rates is not considered to be in accordance with the principles of positive planning, and would likely place significant pressure on housing supply. Recent Planning Inspectorate decisions concur with this view. ⁶
- 3.33 In this context, and given that the 2012-based projections show slightly lower household formation particularly for 25-44 year olds than the pre-recessionary 2008-based projections, it is considered that an adjustment needs to be made to comply with the National Planning Policy Framework's (NPPF) clear policy to 'boost significantly' the supply of housing, 'promote economic growth' and 'positively prepare' Local Plans.
- 3.34 How this adjustment should be applied has been subject of much debate, and there is not considered to be one correct answer, as it is a matter of judgement. However Barton Willmore would suggest a blended approach whereby the 2012-based HFRs are applied in all age groups, as published, with the exception of the 25-44 age group. In this age group it is considered that a gradual return to the projected 2008-based HFRs by the end of the Plan period is applied. This is considered to comply with the NPPF requirement to ensure that Local Plans are positively prepared, and a significant boost is made to housing supply.

iv) Housing Completions

3.35 A lack of housing completions can have a significant impact on the ability for people to move into an area to live, and for existing residents to have the opportunity to purchase their own property. A lack of housebuilding can lead to existing residents having to migrate out of the area. Table 3.6 sets out net completions for Medway over the past 10 years.

⁶ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

Year	Net Completions	Plan Target	Surplus/Deficit
05/06	562	700	-138
06/07	591	815	-224
07/08	761	815	-54
08/09	914	815	+99
09/10	972	815	+157
10/11	657	815	-158
11/12	809	1,000	-191
12/13	565	1,000	-435
13/14	579	1,000	-421
14/15	483	1,000	-517
Total	6,893	8,775	-1,882

Table 3.6: Net Completions, Medway

Source: Annual Monitoring Report

- 3.36 As Table 3.6 shows, since 2005/06 the number of completions has consistently fallen below Development Plan targets, with the exception of two years (08/09 and 09/10). This has resulted in a deficit of -1,882 dwellings over 10 years, representing 20% of planned supply.
- 3.37 Furthermore when compared against the official CLG household projections set out above in Table 3.6, the starting point estimate of need has been at least 1,260 per annum, which suggests under-delivery has been even worse than the comparison against Plan targets.
- 3.38 Notwithstanding this it is considered that this persistent under-delivery in Medway will have had a significant impact on the propensity of people to migrate into the area over the last 10 years. The net-migration trends can therefore be considered to have been constrained by a lack of delivery.

v) Summary

- 3.39 In summary, this section has considered the most up-to-date official population and household projections published by CLG and ONS. The key headlines from this section are as follows:
 - The PPG emphasises that CLG household projections should only form the <u>'starting</u> <u>point</u>' in an objective assessment of the overall housing need, and that sensitivity testing based on alternative demographic and household formation assumptions may be considered;

- This 'starting point estimate' is currently growth of <u>1,281 households per annum</u> in Medway, using the latest 2012-based CLG household projections over the period 2012-2035 (Medway's plan period). Applying a household/dwelling adjustment (to account for vacancy and second home rates) the overall housing need is <u>1,323 dwellings per annum</u>;
- However, Barton Willmore consider that growth of 1,323 dwellings per annum could represent an <u>underestimate</u> of demographic-led housing need for a number of reasons:
- The 2012-based household projections are based on household formation rate trends observed over the recessionary period, when affordability worsened significantly. There remains suppression in the household formation rates for 25-34 year olds in Medway. PPG states that adjustments may be required to the household projection estimate of need if rates have suppressed historically (paragraph 15). An adjustment in Medway is considered necessary in the 25-34 age group to address this suppression;
- Analysis of net housing completions has highlighted that annual completions have <u>consistently fallen below</u> the level of need required by consecutive Development Plans, and below official CLG household projections, inhibiting the propensity of people to migrate into Medway. This would have directly influenced the net migration trends underpinning the 2012-based ONS SNPP and the 2012-based CLG household projection;
- The 2012-based ONS SNPP are also considered a conservative projection in respect of the international migration assumption they are underpinned by (165,000 people per annum). This is <u>less than half</u> the most recent trend data from ONS shows (336,000 people per annum).
- Analysis of migration trends has concluded that the 2012-based SNPP provide a reasonable basis on which to assess demographic-led need in Medway at this point in time. However, for the reasons set out above the 2012-based SNPP should be considered a very minimum and if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase, then an updated short term migration should be considered.
- 3.40 This section identifies how the starting point estimate of OAN (1,323 dpa, 2011-2031) for Medway should be considered a <u>very minimum</u>.
- 3.41 The following section of this study considers the evaluation of official ONS and CLG data in the context of the Council's OAN evidence.

4.0 REVIEW AND CRITIQUE OF THE STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

A) INTRODUCTION

- 4.1 The Strategic Housing and Economic Needs Assessment (SHENA) dated November 2015 provides the evidence base to support the Council's determination of Objectively Assessed Need (OAN) for housing in Medway. The report has been prepared by Bilfinger GVA.
- 4.2 In the context of our assessment of demographic data in the previous section of this study, the following section provides an analysis and evaluation of the SHENA's approach to OAN in Medway. The analysis we present follows the methodological requirements of section ID2a 'Housing and Economic Development Need Assessments' (HEDNA) to determine whether the Council's proposed housing target (1,281 dwellings per annum) represents full, unconstrained OAN.
- 4.3 It is important to note that the SHENA has assessed OAN over the period 2012-2037 which is the time period considered by the latest 2012-based projection series. However, the draft Local Plan covers the period 2012-2035.

B) NORTH KENT STRATEGIC HOUSING AND ECONOMIC NEEDS ASSESSMENT (SHENA)

4.4 The 2015 SHENA seeks to establish the OAN for Medway following the methodology outlined in PPG. We would comment on the SHENA as follows:

i) Housing Market Area (HMA)

- 4.5 The SHENA begins with an assessment of the appropriate HMA in which to assess housing needs for Medway as required by PPG (ID 2a-010-20140306). The assessment's analysis draws on research published by CLG in 2010 titled 'Geography of Housing Market Areas'. In essence this research is based on work undertaken by the Centre for Urban & Regional Development Studies (CURDS) at Newcastle University.
- 4.6 The CURDS analysis is correctly presented by the SHENA as identifying Medway as falling within the London Strategic Housing Market Area which contains over 70 local authority areas. The SHENA considers this HMA definition is unmanageable and impractical (paragraph 2.9). Barton Willmore concurs with this conclusion.

- 4.7 For this reason, the SHENA also considers travel to work and migration patterns, and house price data and concludes that Medway has strong relationships with a number of neighbouring local authority areas. On this basis, the SHENA identifies a wider HMA which includes: Medway; Gravesham; Swale; Maidstone; and Tonbridge & Malling. The housing needs of the wider HMA are assessed in the SHENA
- 4.8 Barton Willmore consider the HMA definition applied in the SHENA to be inconsistent with the approach adopted in several of the authorities included within the definition. For example, Swale's housing needs were considered in isolation at the recent (November 2015) Local Plan Examination after the evidence base suggested Swale formed a HMA on its own. Similarly, Maidstone Borough are assessing their housing needs in isolation. Although Maidstone's SHMA identifies functional relationships between Maidstone and Medway, the Maidstone SHMA concludes that there is justification to distinguish Maidstone from Medway in market terms⁷. On this basis, the Maidstone SHMA considers Maidstone represents a HMA on its own.
- 4.9 On the basis of Maidstone Council and Swale Council both assessing their needs in isolation,Barton Willmore, for the purposes of this critique, consider Medway's needs in isolation.

ii) Starting point estimate

4.10 The SHENA gives detailed consideration to the latest 2012-based ONS Sub National Population Projections (SNPP) and CLG household projections as representing the 'starting point' estimate of need. Growth of 1,270 households per annum over the period 2012-2037 is correctly presented. However, it is important to note that over the period covered by the draft Local Plan (as presented in the current Issues and Options consultation as being 2012-2035) growth is 1,280 households per annum. The SHENA does not present this.

iii) Demographic adjustments

4.11 The PPG (paragraph ID2a-017) states how plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest ONS population estimates.

⁷ Paragraph 2.39, page 29, Maidstone Strategic Housing Market Assessment – Maidstone Borough Council, Final report, January 2014, GL Hearn

Adjustment to household formation rates

- 4.12 The SHENA <u>does not</u> undertake any sensitivity testing in relation to household formation.
- 4.13 The analysis presented in Chapter 3 of this report has shown clear suppression in household formation for those people aged 25-44 years, which Barton Willmore considers should be addressed through making an adjustment to the rates.
- 4.14 The danger of planning on this basis of the 2012-based household formation rates would be to exacerbate this suppression over a 23-year Plan period, adding to the trend of worsening affordability in Medway, and the inability of first time buyers to form their own households. This is not considered to comply with the NPPF requirement to positively prepare Development Plans.
- 4.15 Recent appeal decisions⁸ have agreed that there remains an element of suppression in the 2012-based household formation rates. A more positive approach to household formation in this age group would increase the starting point estimate above 1,270 households per annum (2012-2037)/ 1,280 households per annum (2012-2035).

Adjustment to the demographic projections

- 4.16 The SHENA presents three sensitivity scenarios with regards to the underlying population projections as an alternative to the published 2012-based ONS SNPP.
- 4.17 The **first** demographic sensitivity scenario included by GVA incorporates the 2013 and 2014 Mid-Year Population Estimates (MYPE), published by the ONS after the 2012-based SNPP were published. Despite the 2013 and 2014 MYPE projecting higher population growth than projected in the 2012-based SNPP, the effect of the SHENA incorporating the 2013 and 2014 MYPE into the 2012-based SNPP is to reduce household growth from 1,270 to 1,235 households per annum (2012-2037).
- 4.18 This seems counterintuitive (a point which the SHENA also raises at paragraph 5.38). However, the SHENA states that the reduction in household growth is due to the different age/ gender profile applied as a result of taking account of the 2013 and 2014 MYPE. This requires further investigation through bespoke modelling to establish whether this statement is correct.

⁸ Coalville and Cornwall

- 4.19 The **second** is a long-term (2005-2014) net-migration scenario which results in household growth of 1,148 households per annum again lower than the 'starting point' estimate for 1,270 households per annum (2012-2037) as indicated by the 2012-based CLG household projections. This scenario projects household growth that is <u>10% lower</u> than the starting point estimate.
- 4.20 Lower household growth is the result of lower projected population. The long-term trend (2005-2014) projects lower population growth because net migration is assumed to be lower (756 net migrants per annum) compared to the average net migration assumption of the 2012based ONS SNPP (840 people per annum based on trends from the period 2007-2012).
- 4.21 At paragraph 5.39 the SHENA states that the later years of the inter-Census period (2001-2011), and the last three years since the 2011 Census (2012-2014) show the highest levels of population growth in Medway since 2001. The SHENA then goes on to state how the 2012-based CLG household projections are underpinned by trends drawn "principally from this period of high growth"⁹, and it is therefore appropriate to consider longer term trends from 2004-2014.
- 4.22 In this regard the latest Planning Advisory Service (PAS) guidance on OAN summarises the problems of using the 2007-2012 period as follows:

"The base period used in the latest official projections, 2007-12, is especially problematic. The period covers all of the last recession, in which migration was severely suppressed as many households were unable to move due to falling incomes and tight credit. Therefore the official projections may underestimate future migration - so that they show too little population growth for the more prosperous parts of the country, which have been recipients of net migration in the past. If so, by the same token the projections will also overestimate population growth for areas with a history of net out-migration." ¹⁰

4.23 Whilst Barton Willmore do not disagree with the consideration of longer term trends, the PPG supports adjustments to the 'starting point' estimate of need in relation to the underlying demographic projections and household formation rates. However, PPG states that any local changes would need to be clearly explained and justified on the basis of the established sources of robust evidence (ID 2a-017-20140306). In this instance, consideration of longer term trends does not seem appropriate for Medway as analysis of components of population change (see

⁹ Paragraph 5.39, page 93, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

¹⁰ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

Table 3.2 presented in Chapter 3 of this report and Figure 29 of the SHENA) clearly identifies net migration to Medway increasing since 2011. Therefore to consider a level of net inmigration lower than the 2012-based ONS SNPP in Medway is considered to wholly contradict the advice of the PAS Guidance.

- 4.24 GVA have chosen not to analyse a more recent 5-year trend, a decision Barton Willmore do not consider to be justified.
- 4.25 Analysis of migration trends, presented in Chapter 3 of this report, has illustrated that a more recent 5-year migration trend (2009/10 2013/14), which incorporates the last few years of recession, and the recent economic upturn, suggests net migration of 1,159 per annum. This is higher than the assumptions which underpins the 2012-based SNPP (840 migrants per annum) based on trends from the period 2007-2012.
- 4.26 However, there is not sufficient data at this point in time to say with any certainty whether Medway is experiencing a reversal of trend in terms of net migration. For this reason, despite a more recent 5-year trend showing higher net migration than the 2012-based SNPP, it is considered that the 2012-based SNPP provide the most reasonable demographic projection at this point in time. However, the 2012-based SNPP should provide the very <u>minimum</u> projection of population growth given the issues highlighted in Chapter 3 of this report. Furthermore, we reserve the right to amend this approach if subsequent releases of Mid-Year Population Estimates indicate that net migration to Medway is continuing to increase.
- 4.27 A **third** sensitivity scenario is the long-term net-migration scenario (2005-2014) <u>including</u> the 'unattributable population change' (UPC) recorded by ONS for Medway. The UPC is an element of population change which the ONS cannot account for. There is the possibility that it may be due to under recorded levels of international migration, but it could equally be due to other reasons.
- 4.28 The effect of including UPC within the long-term migration trend scenario is to reduce household growth to 1,124 households per annum (compared to growth of 1,148 households per annum excluding UPC) over the period 2012-2037.
- 4.29 Barton Willmore's approach is to <u>exclude</u> UPC from demographic modelling scenarios. This is based on the following:
 - ONS' confirmation that UPC has been excluded from the calculation of the 2012-based ONS SNPP;

- Advice sent by email from ONS to Barton Willmore that it would be 'sensible' to exclude UPC from the calculation of net-migration trends;
- The ONS statement that if UPC was due to international migration, its effect would have been in the first half of the decade, after which the recording of international migration was improved;
- Local Plan Examination decisions where UPC has been excluded (Aylesbury Vale, Eastleigh, Arun). In the case of the most recent decision in Arun (February 2016), UPC was significant, yet the Inspector noted that if UPC were to be attributed to migration, errors would have been earlier in the 2001-2011 period;
- The ONS' statement that UPC is only applicable to the 2001-2011 period and does not introduce a bias that will continue in future projections.
- 4.30 The UPC scenario is therefore not considered to be a robust scenario for growth in Medway.
- 4.31 The SHENA presents demographic-led need in Medway to be between 1,124 and 1,270 households per annum over the period 2012-2037 based on the results of the two long-term migration trend scenarios. Once an allowance for vacancy has been applied this results in dwelling growth of between 1,167 and 1,317 dwellings per annum.
- 4.32 However, the SHENA acknowledges that due to the uncertainty of UPC, it is appropriate to consider an average of the two long-term migration scenarios (including and excluding UPC)¹¹. This results in growth of 1,136 households (1,179 dwellings) per annum over the period 2012-2037.
- 4.33 Barton Willmore consider that OAN of less than the 2012-based CLG household projection should not be considered, for the following reasons:
- 4.34 First, the 2012-based ONS SNPP were underpinned by net migration trends between 2007 and 2012, and as this analysis shows, they are underpinned by three years (2008-2011) when net in-migration fell significantly below two of the years prior to the 2007-2012 period. This contradicts GVA's statement that the later years of the 2001-2011 period show the highest levels of growth. This statement by GVA is not considered to be justified.

¹¹ Paragraph 5.47, Page 95, North Kent Strategic Housing and Economic Needs Assessment: Strategic Housing Market Assessment, Final Report, Medway Council, November 2015, Bilfinger GVA

- 4.35 The **second point** concerns the assumption of net international migration in the 2012-based ONS National Projections, which underpin the 2012-based ONS SNPP. The 2012-based ONS national population projections are based on net international migration of <u>165,000</u> people per annum continuing every year up to 2037.
- 4.36 The assumption of net international migration in the ONS 2012-based national projections is considered by Barton Willmore to be a significant underestimate. This view is based on more recent evidence from ONS which shows how international net-migration was <u>336,000</u> people in the most recently recorded year (ending June 2015) over double the 2012-based ONS national projection assumption. The 10-year average has also been circa <u>240,000</u> people per annum (see Figure 4.1 below).
- 4.37 On this basis alone, it is considered the 2012-based ONS SNPP, and therefore the 2012-based CLG household projections, are based on conservative assumptions and for this reason should be considered a minimum projection of future growth.
- 4.38 This is emphasised further by the more recent 2014-based national projections (29 October 2015) which have increased the assumption to <u>185,000</u> people per annum. The effect of this increase will be seen in the 2014-based SNPP, which are due for release in the first half of 2016.
- 4.39 A further effect on in-migration is the delivery of housing. Table 3.6 in this study has shown how delivery has fallen below planned targets in all but two of the past ten years. The cumulative effect has been for a deficit in delivery of <u>1,882 dwellings</u> (20% lower than planned supply). This will have constrained in-migration to Medway, and trends would have been higher if planned housing targets had been met and the homes were there to be filled.



Figure 4.1: UK Net International Migration, 2004-2014

Source: Migration Statistics Quarterly Report, November 2015

- 4.40 Finally it is considered the past three years net in-migration to Medway (1,280, 1,293, and 1,793 people per annum respectively) highlight how the 2012-based SNPP and CLG projections are based on a conservative net in-migration assumption of only 840 people per annum.
- 4.41 However, given there is no degree of certainty as to whether Medway is experiencing a reversal of trend in relation to net migration, it is considered that the 2012-based SNPP at the very least should provide the <u>minimum</u> projection of future population growth. On this basis, for the Medway SHMA to favour the long-term migration trend approach (which projects lower population growth) is considered inappropriate.

4.42 In summary, it is not considered justified to project lower population or housing growth than the starting point estimate.

iv) Adjustments to support economic growth

4.43 The approach applied by GVA in the SHENA to economic-led OAN is generally considered robust, save for the assumptions in respect of job growth forecasts. GVA use a single source, Experian Economics, from quarter 1 of 2015. Experian is considered a robust source of job growth forecasts, however it is Barton Willmore's view that an average forecast should be taken from three sources; Experian Economics, Cambridge Econometrics, and Oxford Economics. This view has been taken following criticism of the use of using a single source in some Local Plan

examinations, given the fluctuation in forecasts, which are often published on a quarterly basis. This triangulated approach was supported by the South Worcestershire Local Plan Inspector¹².

- 4.44 In terms of unemployment assumptions, Barton Willmore's approach would be to assume a return to pre-recessionary rates of unemployment over the first ten years of the Plan period. This is a similar approach to the GVA method although they do differ slightly.
- 4.45 Economic activity rate assumptions must also be entered into demographic modelling software to generate the labour force growth required to fill jobs. GVA's approach is to use the Kent County Council 'Technical Paper Activity Rate Projections to 2036' paper (October 2011). This is the same source used by Barton Willmore, and is considered to be a robust independent method which provides unbiased assumptions of how economic activity will increase in older age groups over the next 25 years. However it should be noted that a more recent (November 2014) paper is available and this should be used in preference to the October 2011 edition.
- 4.46 The SHENA also undertakes a sensitivity test of economic activity which incorporates assumptions from Experian's Report 'Employment Activity and the Ageing Population' which has the effect of increasing economic activity of women in line with past trends from 1981, along with significantly increase economic activity for older people.
- 4.47 The commuting ratio is the final assumption which can have a significant effect on economicled housing need. GVA's approach is to use the 2011 Census ratio of 1.28, and for this to remain static over the Plan period. This is considered a robust approach to apply.
- 4.48 The SHENA considered three economic scenarios but only presented the results of two the Sector Based Growth scenario and the Sector Based & London Paramount Indirect Scenario. Housing need to support both economic scenarios increases above the baseline demographic needs (1,179 dwellings per annum as indicated by the mid-point of the two long-term migration trends) if KCC economic activity rates are applied; to support the Sector Based Growth scenario 1,197 dwellings per annum are required and to support the London Paramount Indirect scenario a total of 1,213 dwellings per annum are required.
- 4.49 If Experian's economic activity rates are applied, housing need to support both economic scenarios is below the baseline demographic need (1,020 dpa required to support Sector Growth scenario and 1,036 dpa to support the London Paramount scenario).

¹² Stage 1 of the Examination of the South Worcestershire Development Plan; Inspector's Further Interim Conclusions on the Outstanding Stage 1 Matters, 31 March 2014

4.50 It is important to note that the level of housing need identified from both economic scenarios and both economic sensitivity tests, is below the 'starting point' estimate of 1,270 households/ 1,317 dwellings per annum (2012-2037) as indicated by the CLG 2012-based household projections.

v) Market signals adjustment

- 4.51 The GVA report provides a summary of median **house price** increases in Medway between 2000 and 2013. The source used by GVA in obtaining this information (CLG) is considered robust. As GVA summarise, between 2000 and 2013, values in Medway increased by 128.6%; the second fastest rate observed out of seven authorities analysed. The rate also exceeded inflation in the south east region as a whole (96%).¹³
- 4.52 The SHENA's summary of rental prices shows a significant worsening in the lower quartile **rental prices** in Medway. Over the short period analysed (2010-2014), lower quartile rents increased by 10%; the second highest of the seven authorities analysed. This represents an increase of <u>double</u> that experienced in the south east region (4.3%), and <u>triple</u> the increase across England (3.3%). There is a clear affordability problem in respect of lower quartile rents in Medway when compared to surrounding areas.
- 4.53 The change in the affordability ratio is often the most crucial of market signals indicators, and the GVA report provides a summary of the lower quartile and median affordability ratios in Medway, compared to seven Kent authorities, the south east region, and nationally. The GVA report highlights how the lower quartile affordability ratio in Medway had increased by 65% between 2000 and 2013, and that this increase represents a more acute increase than the region (51%) and nationally (65%).¹⁴ This highlights how affordability has significantly worsened in Medway over the thirteen years analysed.
- 4.54 This study (section 3) identifies how household formation is suppressed in the 25-34 age group in the most recent 2012-based CLG household projections. The result of assuming the formation rates as published, and planning for growth based on them, will be a failure to address the significant increase in **concealed households** in Medway between the 2001 and 2011 Censuses. This increase across the country has been due to the significant worsening affordability of housing, leading to two or more adult households living with one another rather than forming their own households.

¹³ Paragraph 5.90, SHENA

¹⁴ Paragraph 5.97, SHENA

- 4.55 This trend is evidenced in Medway by the 68% increase in concealed households between the 2001 and 2011 Census'. This is broadly comparable to the regional and national averages (71%) although the SHENA states that concealment is not deemed to be worsening at a significant rate. However, the rate of increase in Medway is higher than in Canterbury (66%), Sevenoaks (56%), and Tonbridge and Malling (54%).
- 4.56 Furthermore the SHENA acknowledges a 13.03% increase in concealed households in the under 25 age group (13%). This is higher than the national average (12.76%) and several other Kent local authorities (Canterbury, Dartford, Maidstone, and Swale).¹⁵ Despite this, the SHENA concludes that the market signals information in respect of concealed families does not provide strong evidence of supply led pressures in Medway¹⁶. Barton Willmore disagree and a response in establishing the OAN for Medway is needed to alleviate this worsening trend.
- 4.57 The **rate of development** is also considered as a market signal, with the PPG stating how future supply should be increased to reflect the likely under-delivery of a Plan, if the rate of development has been lower than the planned number. A meaningful period must be assessed in line with PPG, and as this study has shown (Chapter 3), delivery in Medway has been 20% lower than the planned number over the past 10 years.
- 4.58 The GVA report also identifies this lack of delivery, but over the intercensal period (2001-2011) rather than the last 10 years considered in this study (2005-2014). Notwithstanding this difference, GVA identify growth in Medway's housing stock of 7.3%; lower than the subregional, regional, and national averages. Furthermore GVA identify how completions have exceeded planned targets in only three of the 12-year period between 2001/02 and 2012/13¹⁷.
- 4.59 In summary, it is important to note the PPG, which states the following in respect of market signals:

"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings." ¹⁸

"Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. <u>A worsening trend in any</u> of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections."¹⁹ (Our emphasis)

¹⁵ Table 51, SHENA

¹⁶ Paragraph 5.108, SHENA

¹⁷ Paragraph 5.118, SHENA

¹⁸ ID2a-019, Housing and Economic Development Needs Assessments, PPG

¹⁹ ID2a-020, Housing and Economic Development Needs Assessments, PPG

- 4.60 In the context of the PPG, and the analysis set out by GVA, it is clear than an upward adjustment to the CLG household projection for Medway is required. Failure to do so will only serve to exacerbate the conditions which have led to the affordability problems experienced in Medway over the past 10 to 15 years.
- 4.61 The PPG does not quantify the market signals uplift, other than to say how "plan makers should set this adjustment at a level that is <u>reasonable</u>" and "on reasonable assumptions could be expected to <u>improve affordability</u>." ²⁰ Local Plan Examination decisions are the only source in which market signals adjustments have been quantified. At the Eastleigh Local Plan Examination, the Inspector recommended a 10% uplift to demographic-led projections in order to alleviate market pressure considered as "modest". This level of uplift was considered "cautious" by the Inspector. ²¹ The same level of uplift was also considered applicable by the Uttlesford Local Plan Inspector.
- 4.62 An equally cautious uplift of 10% to the 2012-based CLG household projection in Medway would result in an increase to at least **1,456 dwellings per annum**.
- 4.63 The SHENA considers the level of uplift the economic-led scenarios with KCC economic activity rates applied would make to the baseline demographic level of need (mid-point between the two long term migration trends). This is presented as between a 1.5% and 2.9% uplift which is not considered sufficient to respond to the local market signals.²² Barton Willmore agree.
- 4.64 As an alternative, the SHENA also considers the level of uplift the CLG 2012-based household projections, updated to take account of the 2013 and 2014 MYPE, provides to the mid-point of the two long-term migration trends. This is presented as being equivalent to an 8.6%, which the SHENA considers a significant uplift.²³
- 4.65 On this basis the SHENA concludes on OAN for Medway of 1,281 dwellings per annum (2012-2037) as indicated by the CLG 2012-based household projections updated to take account of the 2013 and 2014 MYPE.
- 4.66 Barton Willmore do not consider the market signals uplift applied in the SHENA to be sufficient. The SHENA's 'uplift' is applied to the SHENA's long-term migration trend which is already below the starting point estimate according to PPG. Therefore even applying the market signals 'uplift' results in OAN that is still below the starting point estimate (1,281 dpa compared to 1,323 dpa).

²² Paragraph 5.129, SHENA

²⁰ ID2a-020, Housing and Economic Development Needs Assessments, PPG

²¹ Paragraphs 39-41, Eastleigh Borough Local Plan, Inspector's Report, February 2015

²³ Paragraph 5.130, SHENA

vi) Affordable housing need

4.67 As stated in the NPPF, LPAs are required to ensure their local plans meet OAN for both market and affordable housing. The Satnam v Warrington BC High Court Judgment provides useful guidance on the proper exercise that needs to be undertaken to assess affordable need as part of OAN. That is:

"(a) having identified OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; <u>an increase in the</u> total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes; (our emphasis)

(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPG, paragraphs 14 and 47." $^{\rm 24}$

4.68 The ELM Park v Kings Lynn and West Norfolk BC High Court Judgment (July 2015) provides a more recent judgement on the role of affordable housing need within OAN, determining that affordable need did not have to be met in full when determining OAN but rather:

"This consideration of an increase to help deliver the required number of affordable homes, rather than an instruction that the requirement be met in total, is consistent with the policy in paragraph 159 of the Framework requiring that the SHMA "addresses" these needs in determining the FOAN. They should have an important influence increasing the derived FOAN since they are significant factors in providing for housing needs within an area." 25

- 4.69 It is therefore clear that where there is significant affordable housing need, although it is not required to be met in full, an increase should be considered.
- 4.70 In the context of this, the Council's draft Plan states the following in respect of affordable housing need in Medway:

"The Strategic Housing Market Assessment (SHMA) carried out in 2015 for Medway identified a high level of demand for affordable housing, at <u>17,112 over the plan period</u>. The Local Plan needs to be deliverable, and must demonstrate that the policies are viable. Initial analysis indicates that a percentage of 25% affordable housing would be deliverable on developments of over 15 units, taking into account land values and development costs." ²⁶ (our emphasis)

²⁴ Paragraph 43 (iv) (a) and (b), High Court Judgement CO/4055/2014, Satnam Millennium Limited v Warrington Borough Council, 19/02/2015

²⁵ Paragraph 33, page 11, High Court Judgement CO/914/2015, Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government, ELM Park Holdings Ltd, 09/07/2015

²⁶ Paragraph 7.12, page 21, Medway Council Issues and Options Consultation Document, January/February 2016

4.71 This is a significant level of affordable housing need, equating to 744 affordable dwellings per annum. To deliver this level of affordable housing in full, at provision of 25%, would require full OAN of circa 3,000 dwellings per annum, 2012-2035. It is accepted that 3,000 dwellings per annum is unrealistic, but a figure in excess of the Council's existing target would help to meet some of this affordable need.

vii) Summary

- 4.72 In summary, the SHENA identifies OAN for Medway as being 1,281 dwellings per annum over the period <u>2012-2037</u> based on the results of the CLG 2012-based household projection adjusted to take account of 2013 and 2014 Mid-Year Population Estimates.
- 4.73 This level of housing need has been taken forward in the draft Local Plan to represent need over the period <u>2012-2035</u>.
- 4.74 OAN of 1,281 dwellings per annum is not considered to represent full OAN for Medway over the plan period (2012-2035) for the following reasons:
 - There is not considered to be any justification for a reduction to the starting point estimate (2012-based CLG household projection) of OAN in Medway. This starting position is for provision of 1,323 dwellings per annum, 2012-2035;
 - The starting point estimate is based on a 23-year projection of suppressed household formation in the 25-44 age group, the age group most likely to be first time buyers. This suppression will lead to a significant increase in concealed households in this age group unless the OAN adjusts the household formation rates in this age group. The GVA SHENA proposes no adjustment to account for this suppression. To comply with the NPPF requirement to ensure Local Plans are 'positively prepared' an upward adjustment should be applied for the 25-44 age group. This would lead to an OAN in excess of the starting point estimate;
 - The 2012-based CLG household projection is underpinned by the 2012-based SNPP which is considered to provide the very <u>minimum</u> projection of future population growth in Medway due to the low international migration assumptions they are underpinned by and in light of recent data suggesting that net migration to Medway is in fact significantly higher than the trends underpinning the 2012-based SNPP;

- The GVA SHENA considers alternative long-term migration trends but fails to pay regard to a more recent 5-year migration trend. The SHENA adopts the use of a long-term migration trend to reflect demographic-led need in Medway which projects lower population growth than the 2012-based SNPP and for the reasons outlined above we believe to be inappropriate;
- The GVA SHENA's approach to addressing an uplift to OAN to accommodate economic growth is considered relatively robust. However we would suggest the use of three sources of job growth forecasts to ensure as robust an assessment as possible;
- The GVA SHENA identifies a number of market signals that have worsened to a greater extent than neighbouring authorities, the south east region, and the national average. The SHENA considers that an upward adjustment to the demographic-led OAN is required in order to alleviate the identified market pressure. Barton Willmore support this conclusion. However, it is considered that the market signals uplift that is applied in the SHENA is insufficient given that it results in OAN that is still below the starting point estimate;
- The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 This review of the Strategic Housing and Economic Needs Assessment (SHENA) has considered the objectively assessed need (OAN) for housing over the period 2012-2037 which has been taken forward in the Medway Council Plan Issues and Options document which is planning for housing needs over the period 2012-2035. Full OAN is presented in as being 1,281 dwellings per annum over the period 2012-2035.
- 5.2 In short it is considered the OAN presented in the SHENA plans for very low levels of demographic growth over the Plan period, and does not represent a positively prepared OAN. From the outset, it is important to note how the level of OAN presented in the SHENA is below the PPG's starting point estimate of need the latest CLG household projection (1,323 dpa, 2012-2035).
- 5.3 The SHENA's OAN conclusion is underpinned by applying 2012-based household formation rates to their preferred population projection (a revised 2012-based ONS SNPP scenario to reflect 2013 and 2014 ONS Mid-Year Population estimates). The 2012-based CLG household projection projects suppressed household formation for those aged 25-44 years of age; those most likely to represent concealed households and first time buyers. Barton Willmore consider it necessary to apply an adjustment to address this suppression and positively prepare the Local Plan, an exercise which has not been undertaken in the SHENA. This approach is supported by recent Planning Inspectorate decisions, which note continuing suppression in the 2012-based CLG projections.²⁷
- 5.4 Notwithstanding that the starting point estimate of OAN (1,323 dpa, 2012-2035) is higher than the Council's proposed level of provision, the starting point estimate should be considered a very minimum for a number of reasons.
- 5.5 The 2012-based CLG household projection is underpinned by the 2012-based Sub National Population Projections (SNPP) which assume very low net international migration to the UK (165,000 people per annum) compared with more recent trends (336,000 people in the last recorded year), an assumption which filters down to local authority level and has been identified by recent Local Plan Inspector's decisions²⁸. PAS Guidance also identifies how the net migration of the 2012-based ONS SNPP may well be an underestimate²⁹.

²⁷ Paragraph 3.8, page 7, Cornwall Local Plan Strategic Policies – Examination: Preliminary findings following the hearings in May 2015; Paragraph 29, page 6, Appeal Decision APP/G2435/W/15/3005052; Paragraph 1.28, page 6, Arun District Local Plan OAN Conclusions, 02 February 2016

Local Plan OAN Conclusions, 02 February 2016 ²⁸ Paragraph 1.12, page 3, Arun District Local Plan OAN Conclusions, 02 February 2016

²⁹ Paragraph 6.23, page 23, PAS OAN Technical Advice Note: Second Edition, July 2015

- 5.6 Furthermore, analysis of migration trends has identified that the net migration assumptions of the 2012-based SNPP (840 net migrants per annum, 2012-2037) is low in the context of a more recent 5-year trend given that net migration to Medway has increased over recent years.
- 5.7 However, because it cannot be said with any certainty whether Medway is experiencing a reversal of trend in respect of migration, it is considered reasonable to use the 2012-based SNPP as the most appropriate demographic population projection at this point in time. However, if subsequent releases of Mid-Year Population Estimates provide evidence of net migration to Medway continuing to increase then it would be considered appropriate to change this approach.
- 5.8 With the above points in mind, it is considered that the 2012-based SNPP should provide the very minimum projection of population growth in Medway.
- 5.9 The approach to assessing an uplift for economic growth is considered to be broadly sound. However it is considered that the use of only one forecast is a weak approach. Given the fluctuation of job growth forecasts, Barton Willmore would recommend an average of the three leading forecasting houses; Experian Economics, Cambridge Econometrics, and Oxford Economics. This approach was endorsed by the South Worcestershire Local Plan Inspector.
- 5.10 The SHENA does not suggest a direct uplift to account for worsening market signals. The SHENA acknowledges that some market signals in Medway have worsened to a greater extent than neighbouring local authorities, the south east region, and the national average. The PPG states that an upward adjustment to the demographic starting point should be applied in the event that any of the market signals indicators show a worsening trend. The SHENA considers the level of uplift the economic scenarios provide to be insufficient, however, the 8.6% uplift provided by the CLG 2012-based household projections (adjusted to take account of the 2013 and 2014 MYPE) is considered by the SHENA to provide a significant uplift.
- 5.11 Barton Willmore do not agree. The level of uplift considered by the SHENA is considered in the context of a baseline demographic level of need that is already 10% below the starting point estimate (1,136 compared to 1,270 households per annum) over the period 2012-2037. In effect, the uplift considered by the SHENA still falls below the starting point estimate of need as indicated by the CLG 2012-based household projections, and which Barton Willmore consider to provide a conservative projection of future housing need.
- 5.12 The GVA SHENA and draft Plan identify significant affordable housing need (744 affordable dwellings per annum, 2012-2035). Delivered at a rate of 25%, this would require OAN of 3,000 dwellings per annum if it were to be delivered in full. High Court judgements confirm that Local

Plans do not have to meet affordable need in full, but should be 'addressed', and an increase to OAN considered to help to deliver the affordable housing. The existing OAN determined by the GVA SHENA does not address the significant affordable housing need in Medway.

Way Forward

5.13 The PPG states how the OAN should be an unconstrained assessment. The SHENA's approach to OAN is not considered to comply with the PPG in this regard, and sets an OAN below the PPG's starting point estimate. Adjustments for household formation suppression, more recent migration trends, worsening market signals, and affordable housing need indicate a requirement for OAN significantly higher than the starting point estimate of OAN, 1,323 dwellings per annum (2012-2035). The OAN suggested by the SHENA is considered to be wholly inappropriate and not positively prepared, as required by paragraph 182 of the NPPF.

Appendix 3

Barton Willmore The North Field, Halling: Landscape Appraisal and Green Belt Review (Barton Willmore, February 2016)

The North Field, Halling: Landscape Appraisal and Green Belt Review

Prepared on behalf of Redrow Homes Ltd

February 2016


The North Field, Halling: Landscape Appraisal and Green Belt Review

Prepared on behalf of Redrow Homes Ltd

Project Ref:	23486/A5
Status:	Final
Issue/ Rev:	1
Date:	February 2016
Prepared by:	ET
Checked by:	ET
Authorised by:	MDC

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Tel: Fax: Email: Ref: 23486/A5 Date: February 2016 Status: Final

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ILLUSTRATIVE MATERIAL

Figure 1: Site Context Plan
Figure 2: Site Appraisal Plan
Site Appraisal Photographs (to be read in conjunction with Figure 2)
Site Context Photographs (to be read in conjunction with Figure 1)

1.0 INTRODUCTION

- 1.1 Barton Willmore Landscape LLP (BWLLP) were commissioned by Redrow Homes Ltd to undertake a Landscape and Visual Appraisal of land adjoining North Halling, west of the A228 (Formby Road / Rochester Road) with the purpose of identifying its suitability for residential development and subsequent release from the Green Belt.
- 1.2 The extent of the Site, is illustrated within Figure 1: Site Context Plan. Figure 2: Site Appraisal Plan illustrates an aerial view of the Site.
- 1.3 The Landscape and Visual Appraisal of the Site has been undertaken to:
 - i) Establish the landscape and visual sensitivity of the Site;
 - ii) To assess the Site's contribution to the purposes of the Green Belt, as stated in the National Planning Policy Framework (NPPF) and locally; and
 - iii) Inform any future development of a masterplan for residential development on the Site.

2.0 THE SITE, ITS LOCATION AND CONTEXT

- 2.1 The Site is located within Halling, Kent, on the western slope of the shallow valley formation of the River Medway, which extends northwards, to meet the River Thames at Rochester.
- 2.2 Land use along the western side of the River Medway within the vicinity of the Site and Halling is mixed, and includes industrial buildings, marinas, and residential development. The A228 and Pilgrims Road / Way (west of the Site) provide connectivity to the residential settlements and various land uses along the valley. Beyond this to the west, land rises more steeply, forming a backdrop that is primarily wooded with exposed chalk scarps.
- 2.3 Land use on the eastern side of the River Medway is less urbanised, and comprises primarily agricultural fields and scattered farmsteads. This land is within the Kent Downs AONB.
- 2.4 The Site is adjoined by residential properties on three sides; namely to the north, west and south, accessed from either the A228 or Pilgrims Way / Road.
- 2.5 The Site is approximately 6.8 hectares in area. The Site is an unmanaged, sloping field which falls from 35m AOD in the south-west to 5m AOD in the south-east. It comprises a block of woodland in the southern corner adjoining the A228 and an area of scrub / woodland the south-westernmost corner adjoining Pilgrims Road. Pylons extend along the southern boundary of the Site, beyond which is the recently constructed residential development to the south of the Site ("St Andrews Park").
- 2.6 With regards to relevant landscape and planning policy designations, the Site and / or the surroundings are subject to the following:
 - The Site is within the Green Belt;
 - The Kent Downs Area of Outstanding Natural Beauty extends east-west across Kent, however, the River Medway and the urbanised land to the west of the River Medway (which includes Halling and the Site) are excluded from the Kent Downs AONB;
 - The River Medway and the land east of the A228, east of the Site are designated Strategic Gap. The Site is not included within this designation;
 - Much of the woodland which forms the steep wooded slopes to the west of the Site and Halling is designated as ancient woodland. There are no areas of ancient woodland within the Site;
 - The Site is not within or adjoined by a Special Landscape Area / Area of Local Landscape Importance as identified within the Medway Local Plan 2003;
 - There are no listed buildings within the Site or adjoining the Site; and
 - There are no Scheduled Ancient Monuments within the Site or adjoining the Site.

- 2.7 With regards to Public Rights of Way (PRoW), PRoW RS220 extends along the northern boundary of the Site, between the Site and residential properties to the north. Other PRoWs within the vicinity of the Site include PRoW RS201 which extends westwards from Pilgrims Way up the wooded scarp to the south-west of the Site from where elevated views across the River Medway can be obtained, and MR 1 along the eastern bank of the River Medway.
- 2.8 As demonstrated by the above, the Site is located within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is within the Green Belt, however, is surrounded by residential properties on 3 sides (including recent residential development to the south of the Site). With the exception of its Green Belt designation, the Site is not subject to any other landscape-related or planning policy designations.

3.0 RELEVANT PLANNING POLICY

3.1 The Site is within the Green Belt, as identified within the Medway Local Plan 2003 (saved Policy BNE 30). The preamble to saved Policy BNE 30 states that:

"In Kent, the Metropolitan Green Belt has helped to preserve the open countryside between the edge of Greater London and the urban areas of Medway, Maidstone, Tunbridge Wells, Sevenoaks and Tonbridge. At a more local level, it has helped maintain the open area between Medway and Gravesend."

- 3.2 Under National Planning Policy Framework (2012), Green Belt is a functional designation, its purpose being to prevent urban sprawl by keeping land permanently open and as such the essential characteristics of Green Belts are their openness and permanence. Refer to Section 7 'Green Belt Review' for further details.
- 3.3 To the east of the Site (east of the A228) is land designated as Strategic Gap (saved Policy BNE 31). The aim of this policy is, amongst other things, to prevent development that would result in the degradation of the open character or separating function of the land specifically included within the Strategic Gap. Due to the fact that the Site is not within the Strategic Gap to fulfil its function.

4.0 LANDSCAPE CHARACTER

National Landscape Character

Natural England's National Character Area Profile 119: North Downs

- 4.1 The Site lies within the North Downs Landscape Character Area (LCA), which extends from Guildford to Dover. Key characteristics identified on page 8 include:
 - "... A distinctive chalk downland ridge...
 - ... Chalk soils are predominant across the NCA...
 - The area is cut by the deep valleys of the Stour, Medway, Darent, Wey and Mole...which contrast with the steep scarp slope...
 - Woodland is found primarily on the steeper slopes... Well wooded hedgerows and shaws are an important component of the field boundaries, contributing strongly to a wooded character...
 - Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern..."
- 4.2 Key Landscape opportunities within NCA Profile 119 identified on page 54 include:
 - *"Protect, conserve, an appropriately manage the highly distinctive chalk cliff coastline...*
 - Protect, conserve and enhance the character of much of the downland landscape devoid of development and urban intrusions....
 - ... restoring, significantly expanding and relinking the wetland habitats of the Medway Gap...
 - Manage, conserve, enhance and restore the characteristic pattern of thick well-treed hedgerows and shaws, forming a predominantly irregular field pattern."

County Landscape Character

Kent County Council's Landscape Assessment of Kent 2004: Kent Downs – Medway, Western and Eastern Scarp.

- 4.3 The Site lies within the Kent Downs Medway, Western and Eastern Scarp LCA, and is characterised by:
 - Gently undulating arable farmland;
 - Quarries;
 - Open and wild character on eastern slopes with wide views; and
 - Sparse remnant hedges leading up to wooded ridges with wide views from open and wild eastern slopes.

- 4.4 The LCA is described as a generally incoherent landscape of poor condition in which features do not reflect or enhance the landform, and that there are many visual detractors. The Medway Valley is described as having a significant landform, however, the lower slopes are described as unremarkable when considered in isolation. The LCA describes the landscape as open with moderate visibility, and states that hedged field boundaries and woodland are limited. With regard to the sensitivity of the landscape, the LCA describes this as low.
- 4.5 The Landscape Actions described within the LCA include the creation of a landscape framework to provide an urban edge arable fields and other farmland and the creation of shaws or wide hedgerows as enclosure and to provide a network of semi-natural habitats.

Borough Landscape Character

Medway Borough Council's Landscape Character Assessment March 2011: Character Area 39: Halling Quarries

- 4.6 The Site is located within Character Area 39: Halling Quarries. The Landscape Type is Rural Fringe, sub-type Rural fringe with urban/industrial influences. Characteristics are as follows:
 - "Scarp floor with rolling arable fields, interspersed with small settlements, disused quarries, industrial heritage and Peter's Pit development infrastructure works
 - Heavily wooded disused pits fragment character but screen visual interruption
 - Blue Lake to south west of Halling Cement Works forms distinctive landscape feature; overhead pylons and cement works are detracting features
 - Southern part of character area extends into Tonbridge and Malling"
- 4.7 The LCA is described as being of moderate condition, with some detracting features and moderate sensitivity. 'Issues' identified on page 105 include the new development proposals for Halling Cemex (south of the Site), and loss of rural character from new developments. 'Guidance' includes ensuring the use of appropriate native planting to screen new development from footpaths, roads, existing settlements and rural areas.
- 4.8 The substantial housing development that has been constructed within LCA 39 represents a substantial change to the character area. This residential development is not reflected within LCA 39, which was produced prior to the construction of the development.

Localised Appraisal of the Site and its context

4.9 The published landscape character assessments describe a predominantly chalk landscape, cut by deep valleys including the Medway Valley, where the upper slopes are typically well wooded. More locally, the Medway Valley is described as an incoherent landscape with wide, open views, and of poor condition. Guidelines include the creation of a strong landscape framework incorporating wide hedgerows and shaws to provide a network of semi-natural habitats, and screening development with appropriate native planting from footpaths, roads, existing settlements and rural areas.

4.10 The published assessments broadly reflect the local landscape character of the western edge of the River Medway, which is incoherent and of low sensitivity. At a site specific level, the Site is unmanaged and overgrown, however, does comprise two woodland blocks which should be retained and enhanced as part of any proposed development in accordance with the published guidelines. The guidelines were written prior to the construction of the recent residential development to the south of the Site, which replaced former employment uses.

5.0 VISUAL APPRAISAL

- 5.1 A visual appraisal to ascertain the visibility of the Site in the wider landscape was undertaken in November 2015.
- 5.2 Figure 1: Site Context Plan sets out the viewpoint locations and the extent of visibility of the Site, to be read in conjunction with Site Context Photographs 1 10.
- 5.3 Site Context Photograph 1 is taken from the A228 (Formby Road / Rochester Road) looking west towards the north-eastern corner of the Site. The dense boundary vegetation along the A228 largely screens views from this fast moving, heavily trafficked road.
- 5.4 Site Context Photograph 2 is taken from PRoW RS220 which adjoins the northern boundary of the Site. PRoW RS220 is a narrow path, enclosed to the north by close boarded fencing of the adjoining residential properties and to the south by the scrub and trees which form the northern boundary of the Site. The Site and the recent residential development beyond this are visible, partially screened by the boundary vegetation.
- 5.5 Site Context Photograph 3 is taken from Pilgrims Road, west of the Site at the junction with PRoW RS220. The Site is not visible from this location, screened by a block of intervening woodland, the eastern edge of which forms part of the boundary to the Site.
- 5.6 Site Context Photograph 4 is taken from the westernmost edge of the Site, where part of the Site (that comprises a block of woodland) adjoins Pilgrims Road. Due to the dense woodland structure, only a limited part of the rest of the Site is visible from this location.
- 5.7 Site Context Photograph 5 is taken from PRoW RS201, south-west of the Site, on elevated land overlooking the Medway Valley. The recently constructed residential development to the south of the Site is visible, beyond which is the River Medway and associated industrial land uses. The woodland blocks within the Site are partially visible from this location.
- 5.8 Site Context Photograph 6 is taken from the A228 south of the Site, within proximity of the recently constructed residential development. The woodland blocks and boundary vegetation along the southern and eastern edges of the Site are visible, screening views into the Site.
- 5.9 Site Context Photographs 7 to 10 are taken from footpaths and roads to the east of the River Medway, looking across the River Medway. Existing development is prominent along the lower slopes of the Medway Valley, beyond which, land rises substantially, forming a backdrop to the view comprising woodland, scattered fields and chalk scarp. The Site is visible from these locations, seen in the context of residential properties to the west (visible above the Site), north and recently constructed properties to the south.

Summary:

5.10 The photographs demonstrate that the Site is partially visible from its immediate surroundings, however, views are typically filtered by intervening vegetation. More open views into the Site are obtained from land to the east of the River Medway, however, where these views are obtained, the Site is seen in an urbanised context of the lower slopes of the Medway Valley, beyond which land rises to form a predominantly wooded backdrop to the views.

6.0 OPPORTUNITIES AND CONSTRAINTS

- 6.1 The following landscape opportunities and constraints should be considered when developing a masterplan for residential development on the Site:
 - Existing vegetation structure should be retained, reinforced and enhanced. Implement effective landscape management to ensure thinning, selective felling and replanting to achieve a varied age structure comprising locally indigenous species;
 - Development should incorporate tree planting along the contours throughout the scheme, including along roads and within public open spaces within the Site to mitigate views from across the River Medway, in order to reduce the perception of the built form within the Site;
 - Built form should follow the contours of the Site to reduce the cut and fill requirements;
 - The amenity value of PRoW RS220 along the northern edge of the Site should be enhanced, as currently it is a narrow corridor route, separated from the Site by scrub and scattered trees. Pockets of open space and more open views into the Site and the River Medway to the east should be introduced, with the potential for play areas incorporated within a parkland setting along this route; and
 - The wider pedestrian connectivity locally should be enhanced, by introducing pedestrian connections between Pilgrims Way to the west of the Site and PRoW RS220 to the north of the Site, through the Site.

7.0 GREEN BELT REVIEW

- 7.1 As illustrated on Figure 1: Site Context Plan much of the undeveloped land to the west of the River Medway, including the Site, is designated as Green Belt land. The Green Belt designation excludes land to the north and south of the Site (which comprises residential development), however, indiscriminately washes over residential properties adjoining the western edge of the Site, and other properties along Pilgrims Way.
- 7.2 Under National Planning Policy Framework (2012), Green Belt is a functional designation, its purpose being to prevent urban sprawl by keeping land permanently open and as such the essential characteristics of Green Belts are their openness and permanence. More specifically Green Belt serves the following five purposes:
 - *"to check the unrestricted sprawl of large built-up areas;*
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."
- 7.3 The NPPF states that the key characteristics of the Green Belt are 'their openness and their permanence,' (paragraph 79).
- 7.4 The Site has been assessed in terms of the five purposes set out within the NPPF. In evaluating the contribution of the land to the Green Belt, the Green Belt function of the Site has been ranked within a series of levels or categories, indicating a gradation from none to significant. These thresholds are set out in Table 1 below, while Table 2 sets out an assessment of the Green Belt function of the Site.

Table Heading	Assessment	
Significant	Significant landscape and visual contribution towards purpose of Green Belt	
Some	Some landscape and visual contribution towards purpose of Green Belt	
Limited	Limited landscape and visual contribution towards purpose of Green Belt	
Small	Small Small landscape and visual contribution towards purpose of Green Belt	
None	No landscape and visual contribution towards purpose of Green Belt	

Table 1: Contribution of Green Belt function categories

7.5 An assessment has been made of the openness of the Green Belt in this particular location and to what extent the removal of the Site would have on the perception of openness in the remaining designated area.

Definitions

7.6 When considering the ability of the Site to meet each of the purposes of the Green Belt, the following definitions should be considered.

Sprawl

7.7 Disorganised and unattractive extension to developed area (perhaps lacking defensible boundary), spread out over a large area in an untidy or irregular way. This takes into account the local settlement pattern.

Encroachment

7.8 The gradual advancement of development beyond an acceptable or established limit. This takes into account the condition of the land within the Site and the value it contributes to Green Belt (countryside).

Defensible boundaries

7.9 The NPPF states that, when choosing boundaries, 'local authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent,' (paragraph 85).

Green Belt Function	Assessment	Green Belt Contribution (None /Very Small / Limited / Some / Significant
To check the unrestricted sprawl of large built-up areas	The Site is enclosed and adjoined by residential development to the north, west and south and the A228 to the east, and therefore development on the Site would not result in sprawl, as is contained by development that surrounds it.	None
	There is an opportunity to reinforce the existing landscape structure through the enhancement of the landscape buffers around the Site, comprising native species hedgerows and trees, which would provide a defined edge to the development, whilst also contributing positively to local landscape character.	
	Therefore, it is considered that the Site has the ability to absorb development without contributing to an increase in the extent of unrestricted sprawl of the	

Table 2: The Site's Contribution to the Purposes of the Green Belt

Green Belt Function	Assessment	Green Belt Contribution (None /Very Small / Limited / Some / Significant
	existing settlement pattern.	
To prevent neighbouring towns merging into one another	Due to the urbanised nature of the lower valley slopes on the western side of the River Medway, there is no clear distinction between settlements locally. Policy BNE 30 of the Medway Local Plan states that the Metropolitan Green Belt has helped to maintain the open area between Medway and Gravesend, and the open area between London and other urban areas of Medway, Maidstone, Tunbridge Wells, Sevenoaks and Tonbridge. The geographic location of the Site is not applicable to these functions and cannot be described as 'open countryside'.	None
To assist in safeguarding the countryside from encroachment	The variety of land uses lead to an incoherent character locally with strong urban fringe characteristics, and as demonstrated in the visual appraisal section, visibility into the Site is limited and filtered due to intervening vegetation and built form, with the exception of the longer views from the east of the River Medway, from which the strong urban fringe character of this location is evident. As a result the contribution the Site makes to the 'openness' of Green Belt is limited. Furthermore, the perception of 'countryside' is further reduced by the presence of the fast-moving A228 road adjoining the eastern edge of the Site which is audibly intrusive. The introduction of development would result in the replacement of a field with built form, however, the	Limited
To preserve the setting and	effect would be perceived within a limited visual envelope, constrained by local topography, intervening vegetation and built form, and seen in the context of the Site's urbanised surroundings. The Site is not within, or visible from any historic towns, and is not within or visible from any	None
special character of historic towns	Conservation Area. Therefore, the development of the Site would have no effect on the setting or character of any historic towns.	

- 7.10 The fifth NPPF Green Belt function to assist in urban regeneration is not a landscape and visual consideration. Should the Site be brought forward for redevelopment, this would not prejudice derelict land coming forward in the future.
- 7.11 The above demonstrates that due to the urbanised context of the Site's surroundings, the Site makes little to no contribution to the purposes of Green Belt, and therefore that the Site could be released from the Green Belt, and residential development accommodated within the Site.

8.0 SUMMARY AND CONCLUSION

The Site and Context

- 8.1 The Site is located within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is within the Green Belt, however, is surrounded by residential properties on 3 sides including recent residential development to the south of the Site. The A228 and Pilgrims Road / Way provide connectivity to the residential settlements and various land uses along the valley. Beyond this to the west, land rises more steeply, forming a backdrop that is primarily wooded with exposed chalk scarps.
- 8.2 With the exception of being within the Green Belt, the Site is not subject to landscaperelated or planning policy designations.
- 8.3 The Site is approximately 6.8 hectares in area. The Site is an unmanaged, sloping field which falls from 35m AOD in the south-west to 5m AOD in the south-east. It comprises a block of woodland in the south-eastern corner adjoining the A228 and an area of scrub / woodland the south-westernmost corner adjoining Pilgrims Road / Way. Pylons extend along the southern boundary of the Site, beyond which is the recently constructed residential development to the south of the Site ("St Andrews").

Landscape Character

- 8.4 The published landscape character assessments describe a predominantly chalk landscape, cut by deep valleys including the Medway Valley, where the upper slopes are typically well wooded. More locally, the Medway Valley is described as an incoherent landscape with wide, open views, and of poor condition. Guidelines include the creation of a strong landscape framework incorporating wide hedgerows and shaws to provide a network of semi-natural habitats, and screening development with appropriate native planting from footpaths, roads, existing settlements and rural areas.
- 8.5 The published assessments broadly reflect the local landscape character of the western edge of the River Medway, which is incoherent and of low sensitivity. At a site specific level, the Site is unmanaged and overgrown, however, does comprise two woodland blocks which should be retained and enhanced as part of any proposed development in accordance with the published guidelines. The guidelines were written prior to the construction of the recent residential development to the south of the Site, which replaced former employment uses.

Visual Appraisal

8.6 The Site Context Photographs which accompany this Appraisal demonstrate that the Site is partially visible from its immediate surroundings, however, views are typically filtered by intervening vegetation. More open views into the Site are obtained from land to the east of the River Medway, however, where these views are obtained, the Site is seen in an urbanised context of the lower slopes of the Medway Valley, beyond which land rises to form a predominantly wooded backdrop to the views.

Opportunities and Constraints

- 8.7 The following landscape opportunities and constraints should be taken into consideration when developing a masterplan for development on the Site, to help assimilate the development into the Site and its context:
 - Retain and enhance existing vegetation including the woodland blocks within the Site to enhance visual amenity and biodiversity;
 - Incorporate tree planting throughout the scheme to reduce the perception of built form within the Site, particularly from the eastern side of the River Medway and ensure that development follows the contours of the Site;
 - Enhance the amenity value of the footpath (PRoW RS220) which adjoins the northern edge of the Site by introducing new pockets of open space and along the route and managing the vegetation to allow more open views towards the River Medway; and
 - Enhance local pedestrian connectivity, by incorporating new pedestrian routes through the Site from Pilgrims Road / Way in the south-west to PRoW RS220 in the north.

Green Belt Review

- 8.8 The Site has been assessed in terms of the five purposes set out within the NPPF. As demonstrated within the table in Section 7 of this Appraisal, the Site makes **no contribution** to checking the unrestricted sprawl of large built-up areas, preventing neighbouring towns merging into one another, and preserving the setting and special character of historic towns); makes a **limited contribution** to assisting in safeguarding the countryside from encroachment; and **would not prejudice** derelict land coming forward in future for development.
- 8.9 The above demonstrates that the Site could be released from the Green Belt, and residential development accommodated within the Site.

Conclusion

8.10 As a result of the above considerations it is concluded that sympathetic development within the Site would be acceptable in landscape and visual terms and would result in limited to no effect on the function of the Green Belt. The Site could successfully accommodate residential development, assimilated into the existing development pattern of its urbanised surroundings, which includes residential development on 3 sides of the Site.



Date Drn Ckd



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K:\23000-23999\23400-23499\23486 - North Field, Halling\A4 - Dwgs & Registers\Landscape\23486 L2 Aerial Plan Of Site.dwg - A3

The scaling of this drawing cannot be assured Revision Date Drn Ckd LEGEND Site Boundary Existing Water Courses and Features ^ Contours/Spot Heights (Metres AOD) ^ Public Rights of Way *



Location of Photographic Viewpoints (Site Appraisal Photographs: A-C)

Sources

OS Mapping Meadway Definitive Map

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

Figure 2

Project North Field, Halling, Kent Drawing Title Aerial Plan of Site



Offices at Reading London Bristol Cambridge Cardiff Ebbsfleet Edinburgh Leeds Manchester Solihull



SITE APPRAISAL PHOTOGRAPH A : VIEW FROM SOUTH-WESTERN PART OF SITE, LOOKING SOUTH-EAST Date Taken: November 2015



SITE APPRAISAL PHOTOGRAPH B : VIEW SOUTH FROM SITE TOWARDS FORMER CEMENT WORKS AND ADJOINING RESIDENTIAL DEVELOPMENT (DURING CONSTRUCTION)
Date Taken: March 2014



SITE APPRAISAL PHOTOGRAPH C : VIEW FROM THE NORTHERN BOUNDARY OF THE SITE, LOOKING SOUTH-EAST Date Taken: March 2015



PROJECT NUMBER: 23486

SITE APPRAISAL PHOTOGRAPHS: A - C RECOMMENDED VIEWING DISTANCE: 20CM @A1



SITE CONTEXT PHOTOGRAPH 1: VIEW FROM ROCHESTER ROAD/ FORMBY ROAD (A228), LOOKING WEST Distance: 19m



SITE CONTEXT PHOTOGRAPH 2: VIEW FROM PROW RS220 Distance: 2m



SITE CONTEXT PHOTOGRAPH 3: VIEW FROM PILGRIMS ROAD / WAY, LOOKING SOUTH-EAST Distance: 71m



SITE CONTEXT PHOTOGRAPHS: 1 - 3 RECOMMENDED VIEWING DISTANCE: 20CM @A1 DATE TAKEN: NOV 2015 PROJECT NUMBER: 23486

NORTH FIELD, HALLING, KENT

Residential properties on Formby Road / Rochester Road (A228)



SITE CONTEXT PHOTOGRAPH 4: VIEW FROM PILGRIMS ROAD / WAY, LOOKING EAST Distance: 5m



SITE CONTEXT PHOTOGRAPH 5: VIEW FROM PROW RS201, LOOKING EAST Distance: 310m



SITE CONTEXT PHOTOGRAPH 6: VIEW FROM FORMBY ROAD / ROCHESTER ROAD (A228), LOOKING NORTH Distance: 240m





SITE CONTEXT PHOTOGRAPHS: 4 - 6 RECOMMENDED VIEWING DISTANCE: 20CM @A1 DATE TAKEN: NOV 2015 PROJECT NUMBER: 23486



SITE CONTEXT PHOTOGRAPH 7: VIEW FROM AONB (KENTS DOWNS), LOOKING WEST Distance: 327m



SITE CONTEXT PHOTOGRAPH 8: VIEW FROM WOULDHAM ROAD, LOOKING NORTH-WEST Distance: 1.03km



SITE CONTEXT PHOTOGRAPH 9: VIEW FROM PROW/MR2, LOOKING WEST Distance: 1.95km

Residential properties west of Site along Pilgrims Road / Way



SITE CONTEXT PHOTOGRAPHS: 7 - 9 RECOMMENDED VIEWING DISTANCE: 20CM @A1 DATE TAKEN: NOV 2015 PROJECT NUMBER: 23486



SITE CONTEXT PHOTOGRAPH 10: VIEW FROM PILGRIMS WAY, LOOKING NORTH-WEST Distance: 2.1m



SITE CONTEXT PHOTOGRAPHS: 10 RECOMMENDED VIEWING DISTANCE: 20CM @A1 DATE TAKEN: NOV 2015 PROJECT NUMBER: 23486

Name: Richard Hatter

Reference 172

Organisation Thurock Council

On Behalf Of

Type of Consultee

Government/Public Body

Civic Offices, New Road, Grays Essex RM17 6SL

Strategic Planning Policy

Date: 26th February 2016

Planning Policy Regeneration Community & Culture Medway Council Gun Wharf Dock Road Chatham, Kent ME4 4TR

<u>RE: MEDWAY COUNCIL LOCAL PLAN – ISSUES AND OPTIONS</u> <u>CONSULTATION JANUARY TO FEBRAURY 2016</u>

Thurrock Borough Council has considered the consultation on the Medway Local Plan Issues and Options Report and sets out its formal comments at this stage.

Thurrock Council welcomes the opportunity to discuss the comments submitted and requests to be consulted and engaged at further stages of the Medway Local Plan under Duty to Co-operate arrangements.

Question 2 – What do you think are the strategic issues that the Local Plan needs to address?

Question 3 – How should the council respond to these issues?

Thurrock Council supports the overall approach being taken to the Medway Local Plan and notes that the current Issues and Options document represents a direction of travel document rather than a draft local plan. It is also understood that in the preparation of the local plan that Medway Council will be adding to and updating the evidence base. At the Duty to Cooperate meeting on the 11th Feb 2016 at the Medway Innovation Centre representatives of adjoining LAs were told that there would be a second and much more detailed Issues and Options consultation stage. Thurrock would encourage Medway to follow this approach.

In response to the consultation Thurrock Council has at this stage identified a number of issues which are considered to be strategic matters with cross boundary implications that should be considered under the Duty to Cooperate.

Full Review of the London Plan

In recognition of the timescale for the preparation of the Local Plan it will be for Medway Council to have regard to the timetable for the Full Review of the London Plan and any strategic matters and issues that should be taken into consideration. Following the Summit with the GLA in December 2015 the Wider South East authorities have agreed to work in collaboration with the Mayor for London and GLA on strategic matters including the Full Review of the London Plan. The South East



authorities should have regard in plan preparation to any cross boundary matters with London and to any collaboration on spatial strategy and new up to date evidence. In particular, the Wider South East authorities may collaborate with the Mayor and GLA on certain technical evidence regarding matters such as population and housing, employment, transport infrastructure and minerals and waste.

Lower Thames Crossing

The Government is currently consulting on a further Lower Thames Crossing. The southern path for the route of Option C would extend south of the river with junctions with the A2 with one option immediately west of the Medway Borough boundary.

A Lower Thames Crossing will clearly have a range of economic implications for the new Medway Local Plan and direct environmental and traffic implications if an Option C route is announced with a new junction on the A2 adjoining Medway.

Thurrock Council formally objects to any proposals for a Lower Thames Crossing in Thurrock Borough. In addition, the Council does not consider that sufficient evidence has been provided in terms of the business case, transport modelling or the environmental impact of any of the options currently out for consultation.

Thurrock Council is prepared to liaise with other Councils either side of the river to further assess the evidence in response to the current consultation and in any future consideration of a Lower Thames Crossing.

London Paramount Development

The London Paramount development proposed on the Swanscombe Peninsula would have a significant impact on employment and business activity in the subregion as well as significant impacts on the local and regional highway network. If the London Paramount scheme is progressed then Medway Council will need to consider the implications for its local plan in terms of business and jobs, leisure and visitors and the transport network.

Housing and Employment

It is acknowledged that Gravesham and Medway Council have undertaken a Strategic Housing and Economic Needs Assessment (SHENA) and that Medway Council intends to accommodate its own objectively assessed need within the borough. Thurrock Council as an adjoining local authority north of the river Thames is <u>not</u> within the same Housing Market Areas as defined by Gravesham and Medway SHENA. Thurrock Council together with other South Essex authorities have undertaken a SHMA to inform their local plans and this is due for publication in spring 2016. Although in separate housing market areas it will be helpful in going forward to continue to understand the key issues and challenges that impact on both housing market areas and for the local authorities to exchange any relevant information and data to support the duty to cooperate on strategic planning matters.

It is considered that in progressing the local plan and supporting evidence base that Medway Council should review and update the SHMA assessment if necessary to take account of any future implications of the Full Review of the London Plan, the London Paramount development and the Lower Thames Crossing.

Flood Issues

Flood defence and flood risk mitigation are significant issues for the authorities in the Thames estuary and the local authorities should have regard to the key policies and actions in the TE2100 Plan together with other plans such as the Strategic Flood Risk Catchment Plan, River Basin Management Plans and Marine Plans. Whilst Thurrock Council is within adjoining administrative regions and policy zones for a number of these plans the Council will continue to support a strategic approach to flood defence and flood risk and work with other authorities and partners where there are matters that impact estuary wide or specifically relating to authorities in this section of the Thames estuary.

Minerals and Waste

Medway Council has stated that it will prepare mineral and waste policies as part of the new local plan. Medway Council should have regard to cross boundary matters relating to minerals and waste. The Council should ensure it has up to date and robust evidence and has taken into account the plans and proposals of adjoining mineral and waste planning authorities. Thurrock Council welcomes the opportunity to engage with Medway Council to consider the evidence base and any cross boundary issues that may be relevant to both Councils.

Duty to Cooperate

As part of the response to the current consultation Medway Council might consider producing a list of strategic cross boundary matters. It may be beneficial to identify relevant issues and examine how important they are for Medway. This may perhaps include what outcomes the Council is seeking to achieve through the Duty to Cooperate.

Question 16 – What are the opportunities for further business growth in and close to the town centres in Medway?

Question 17 – Do you agree with the scale of jobs and employment land needs identified for Medway over the plan period?

Question 18 – How can Medway realise opportunities to capitalise on growth in the wider area, including London.

Medway Council should consider further the implications of the proposed London Paramount development at Swanscome Peninsula and the future Lower Thames Crossing for employment and jobs in the preparation of Local plan and supporting evidence base. The development of both projects could have significant impact on the scale and locational requirements of various business sectors and jobs in relation to Medway.

Thurrock Council together with the other South Essex local authorities are commissioning a Strategic Economic Development Needs Assessment (EDNA). The South Essex EDNA study will include assessment of strategic developments and the potential implications of the Lower Thames Crossing. Thurrock Council will be happy to engage with Medway and other authorities during the preparation of the study and consider its outputs as part of Duty to Cooperate.

Question 59 – What are the requirements for Wharves and their supporting land-side infrastructure in Medway over the plan period?

It is acknowledged that current planning polices and strategies of authorities in the Thames estuary seek to protect marine wharves and jetties for the importation and transhipment of marine won sand and other aggregates. Thurrock Council has no specific comment about any wharf or jetty site in Medway but supports the principle of safeguarding wharfs for aggregates unless there is an overriding reasons that the site is no longer suitable for such a purpose.

It is understood that an assessment has been undertaken of wharves and jetties in the South East region. However Thurrock Council would be willing to participate in any future approach that sought to undertake a strategic review of such facilities in the Thames estuary.

Question 60 - What provision should the Local Plan make for waste management and disposal in Medway, for both household and commercial streams?

As a Waste Planning authority it is considered the Medway should make provision in the new local plan for waste management facilities with capacity equivalent to its own waste arisings for household (LACW) and Commercial and Industrial (C&I) waste.

Medway Council should also have regard to and make provision for any waste importation from London as identified in the existing adopted London Plan with Further Alterations (FALP). The adopted FALP (2015) includes waste export to landfill of household and commercial waste continuing to the wider South East until 2026.

It is also noted that a number of emerging waste local plans of London boroughs indicate the continued export of waste and in particular over the longer term the continuing exports of construction, demolition and excavation wastes (C,D&E waste). The current London Plan did not address the export of such waste. The Medway Local Plan and supporting evidence should address C,D&E wastes and any implications of the export of such wastes from London.

Thurrock Council has begun the preparation of its own consolidated Local Plan that will eventually superceded the adopted Core Strategy that includes the existing waste planning policies for Thurrock. Thurrock Council welcomes the opportunity to further discuss any cross boundary waste matters and confirm with Medway Council any waste export or import flows between the two authorities.

Question 71 – What infrastructure is required to support Medway's growth over the plan period?

It is understood that Medway Council are to undertake a strategic transport assessment to support the strategy for the borough and the evidence base for the local plan. Thurrock Council supports such an approach. In progressing such a strategy and associated evidence Medway Council will need to consider the implications on the transport network of any announcement by the Government on a preferred option for the Lower Thames Crossing and in particular if there is an Option C or similar route. It is acknowledged that the current options in the Highways England consultation propose an option and route south of the river with a junction with the A2 immediately west of the Medway Borough boundary.

Yours sincerely



Richard Hatter Team Manager Strategic Planning Policy Thurrock Council

Name: Alan O Watkins

Reference 173

Organisation

On Behalf Of

Type of Consultee Member of the public

A RESIDENT'S VIEW OF THE DRAFT MEDWAY COUNCIL LOCAL PLAN DRAFT 2012 - 2035

The growth of population forecast in the draft Local Plan consultation paper indicates that pressure will grow on potential development areas, including sites sensitive to the local communities. The threat to the long-held plan to develop Lodge Hill increases the pressure. (Q.15)

In order to meet the needs forecast in the draft document, four areas need to be considered:

- The Hoo peninsula
- Chatham centre
- Capstone Valley
- Expanding the size of the borough

HOO PENINSULA

The loss of Lodge Hill would raise the need to increase the residential provision on the peninsula because of its accessibility to major roads, heavy employment opportunities and potential availability of land, especially between Hoo St Werburgh and the A228. The expansion of the village would need to be matched by greater investment in infrastructure including roads, public transport, cycle ways and footpaths. High Halstow should be similarly considered in the area either side of Britannia Road as far east as Walnut Tree Farm, Clinch Lane and as far south as Christmas Lane by 2035. However Hoo St Werburgh and High Halstow are unlikely to provide sufficient housing to replace the loss of Lodge Hill, or meet the growth in population being forecast.

Neighbouring villages (Allhallows, Grain, Stoke, Cooling and St Mary Hoo) need to be considered in the equation. They should be considered as satellites with limited new building to meet the needs of young people already living in the villages, and elderly residents wishing to downsize, requiring sheltered residences or bungalow living.

The land north of the A228 between Cooling and Allhallows should be maintained as agricultural, nature conservation and flood relief. (Q.15, 38, 39, 62, 63

CHATHAM CENTRE

A detailed review of the planning needs of Chatham Centre has long been due. Redevelopment has looked at the outskirts of the central area, but the built areas centred on the High Street remain without any pre-planning for the future. There is now an urgent need to consider what should happen with the retail offer in the High Street as companies continue to withdraw in the face of new shopping areas (Bluewater, Hempstead Valley, Chatham Maritime), online purchasing and lost custom.

Chatham Centre should be considered as a potential retail and commercial business area, with residential housing, leisure provision and transport provision. For example, many Chatham residents now shop in the newer retail outlets, causing financial stress on the remaining town centre outlets. (Para 27.36)

The draft paper makes it clear converting office blocks is costly and not successful. So what happens to Mountbatten House? (Para 8.21) A Town Centre Plan should be drawn up that, if the owners

decide to demolish the building in the future, a lower and less intrusive building should be permitted more in keeping with the waterfront, the bus station and the views from the Great Lines.

A further consideration should include hotel(s) development in the town centre. This should initially build on the development of the Universities and commercial businesses, rather than tourism. However, the council and major tourist attractions need to take a higher profile at events like the World Travel Market to raise awareness of the attractions in Medway as well as developing new tourist opportunities. (Q.22, 23, 25, 26

CAPSTONE VALLEY

There have been aspirations for years to develop the farm land between the M2 and the Darland Banks. Serious consideration needs to be given to the potential for some of the land to be developed either for commercial purposes or as a new hospital site to replace Medway Maritime Hospital. The site at its north east end is close to junction 4 of the M2 motorway and would permit a much faster, and troublefree access to a hospital which would be able to offer modern A&E facilities, including (potentially) to a much wider area than at present.

The draft paper describes the present Edwardian hospital as being "on a constrained site in a tightly knit part of Gillingham, which places pressures on buildings and infrastructure, and can experience difficulties of access." (Para 14.5)

Anyone living in Medway knows the difficulties caused by the present-day location of the hospital. It is the cause of major traffic congestion at the main entrance as cars queue for limited parking spaces. Bus services are disrupted in and out of the hospital, causing further problems across the Medway Towns as the services – which serve places as far afield as Lordswood, Walderslade, Hazlemere Drive (Gillingham), Rainham and Sittingbourne are regularly delayed for upto 45 minutes. (Q. 56, para 25.1,

EXPANDING THE BOROUGH

Politically the most contentious proposal would be what some would call a land grab, but as the population grows to a third of a million residents it may be necessary to obtain more land for the main part of the conurbation. This could be either by recovering Higham, or by expanding towards Newington. Neither idea would be popular but would enable the extended towns to expand naturally. The idea of recovering Higham – once part of Strood – would have advantages for tourism thanks to its links with Dickens, Shakespeare and the Roman invasion of 43AD. However, the proposal to develop a western access point to the Lower Thames Crossing into Essex to relieve the M25 takes up much of the possible development land. (Q.16

The area to the east of Rainham, however already has housing and commercial developments just beyond the Medway boundary that would sit more appropriately as part of the unitary authority than the rural concept of Swale borough. (Q.5, 15, 16, 39, 56

TRANSPORT

The stations of Medway have either been rebuilt and improved (North Kent Line), or provided with additional train services (Medway Valley Line). Bus services are increasingly under threat, however.

The council needs to provide attractive opportunities for buses so that they can be expanded in new developments or existing areas. The more people that can be encouraged to use fast, inexpensive and attractive bus services the more that will be attracted away from cars. With an aging population the provision of regular bus services to main centres needs to increase.

The cost of travelling on Arriva buses is among the most expensive anywhere in Britain. How this attracts passengers is difficult to understand. (Q. 71, 72, para 13.5). Those with a sense of flippancy could suggest it might increase rates of walking and cycling, however (Q. 72)

There have been improvements. Hempstead has recently seen its bus services expanded. However, it has been at the expense of services through Parkwood and Rainham because of the numerous diversions that have been introduced (service 116). It is now quicker to catch a train from Rainham to London Victoria than it is to catch the 116 bus from Rainham to Chatham. That is not going to be attractive to passengers.

Improvements should include bus priorities at traffic lights. They should immediately respond to the approach of a bus, coach or taxi. There is no value in providing bus lanes at traffic lights if the bus is then stopped to allow the cars through (Tesco roundabout, A2). (Q. 71)

Closer planning should take place with the bus operators (notably Arriva as the main current provider but not overlooking other opportunities provide by smaller operators or major providers which currently do not operate in Medway). There is a bus quality partnership in place, but it only involves one operator (Arriva). It is intended to improve journey times and promote increased patronage. (Para 25.4)

One of the first examples appears to have been the introduction of "the Loop" bus service. It was subject to so many delays (hospital, roadworks, route diversions) it became the source of industrial action by the drivers. The Loop has now been replaced by a variation of its former parts, services 113 and 116. However, while Hempstead has benefited the passengers have been put off using it because it is so much slower than the route that existed until July 2015. (Q.72)

Alan O. Watkins

9 Feb 2016

Name: Cllr Rupert Turpin

Reference 174

Organisation

On Behalf Of

Type of Consultee Councillor/MP/Parish Council
maryott, kyle

From:	Councillor
Sent:	01 March 2016 16:38
To:	policy, planning
Subject:	local plan
Follow Up Flag:	Follow up
Flag Status:	Flagged
Categories:	Blue Category

Question 1:

Vision: Medway should develop as the four towns with distinct roles and identities: Rochester- heritage/tourist. Chatham naval town and shopping centre and dockyards, Gillingham business parks and students, Rainham High quality of life family town. The distinctiveness of the towns are complementary and strengthen eachother to make Medway as a whole stronger, but the distinctiveness of the constituent towns should not be obscured by the identity of Medway as a whole.

Medway's green spaces and lungs are vitally important and should not be lost in searching for new housing sites. They contribute to a sense of well being and a healthy lifestyle. Cycle routes should encourage a healthy lifestyle and countryside corridors will help wildlife to thrive. A green space which can be properly designed and looked after for the benefit of all should perhaps replace the large gardens which our Victorian ancestors regarded so highly. They will also raise the value of the housing all around and avoid Medway becoming a concrete jungle. Some assessment of how far houses are from a green space for public use should be included as information on large or medium planning applications. Additionally brownfield sites should not automatically be assumed to go for housing if parking in the area is already very tight. Parking can be profitable in and of itself rather than housebuilding and consideration should be made to turn brownfield sites into either green spaces or parking spaces depending on the needs of the area.

As a whole, Medway should concentrate on family accommodation. Flats and student flats are suitable in certain areas such as riversides where high quality and value can be maintained and there are views. Near Chatham Town Centre there are areas of poor quality housing which could be cleared and built up to higher levels, ie 4 or 5 storey accommodation to give more of a sense of a city centre rather than a town centre, but these should be high quality and not degenerate into high rise flats of poor quality. Remember that the 25% rule for social housing can rise much higher if the quality is poor such that they are not valued by the private sector.

It is very important that the roads are kept flowing by good traffic design, especially for air quality. A decision needs to be made on intense developments whether they are designed for cars or not. A half way house with inadequate parking will be frustrating for all involved. See The Fort in Rochester for adequate parking and other new developments where parking is inadequate. IN the long term, where parking is good , the value of the properties will hold higher and the quality of life will be better.

Waste management needs a better solution, perhaps one or two super recycling sites which are much bigger and therefore more efficient. There needs to be a proper solution for industrial and commercial waste, especially for the small businessman and the landlords, as around 35% of homes are rented and presently there is no provision for landlords to recycle waste except at prohibitive cost and great distance (Sittingbourne) At present the lack of provision is off putting to the small businessman.

Culturally, Medway will need to retain at least one high quality Theatre or public performance space. Anything else would be a travesty to the cultural life of the towns. A secondary option-would be a world class art gallery similar to Margate's which would concentrate on naval art and complement the Historic DOCKYARDS.

Careful provision will need to be made for the elderly and disabled people. Purpose built accommodation with high tech assistance will enable older people to be independent for far longer. The provision in many places is now looking a bit out of date especially in the area of technology.

Broadband provision needs to be improved- restrictions placed by the council on council or school owned properties needs to be lifted so that improved broadband can be put in place.

Housing standards should avoid small houses which will be cramped and inadequate for their inhabitants. Developers will often build strictly to the lowest specification to make more money so these standards need to be generous.

Medway should have a mixed economy of all types of business locating in Medway for convenience to markets, good travel connections, good broadband, good business rates and a ready supply of labour.

Medway should be a mecca in the Kent region for the arts, especially as we have an arts college UCA. All forms of art from performance art and painting and sculpture and photography should be encouraged.

Medway will, sooner or later, require a new hospital and a location should be earmarked for this and plans made.

High quality self builds should be encouraged, provided the roads infrastructure is built in to ensure that the roads are good and maintained.

The marshes and the downs are important natural areas and heed should be paid to respecting their importance for biodiversity. It would be vital to designate areas which cannot be developed on to protect these features.

I think the assessed housing need of 29,000 is way too high and also undeliverable.

A financial assessment for the deliverability of slum clearance should be made for slum areas close to Chatham or Gillingham town centres, the increased population would help revitalise the town centres. Thought should be given to designating appropriate areas and delivering this once the financial assessment for viability has been made. Of course this goes on in London and it is only a matter of time before the sums add up in Medway too.

Medway, and especially Chatham and Rochester ,should continue with a good and improving tourism offer as they have an incredible amount of history. Not all of this should centre on the person of Charles Dickens, great though he was.

CLLR Rupert Turpin Sent from my iPad

Name: Julie Wantling

Reference 175

Organisation

On Behalf Of

Type of Consultee Member of the public

maryott, kyle

From: Sent: To: Subject:

29 February 2016 17:23 policy, planning Issues and Options - feedback

Follow Up Flag: Flag Status:

Follow up Flagged

Sirs,

I have rather quickly fashioned a short response to the above consultation document.

In my haste there were many sections I didnt have time to respond to, but one important section was question 38. Would you add this to my earlier response please?

38) Sudden increase in housing has put the village services under strain. Medical appointments are difficult to get and the village shops and car parks are very busy. The consultation says that village centres can be improved with development, but we have not experienced this and of course there is an assumption that the centre has physical room for development.

If Hoo is to be a 'service centre' then investment in the facilities is needed alongside more frequent bus service (eg Grain bus).

Development could include a community centre (or adaption of the village hall) with community services such as age concern groups or drop in services. Or a 'healthy living centre' where people can get emergency appointments for dentistry, consultant appointments, diabetes checks or simple procedures such as having stitches removed (currently have to travel to Rochester)

Thank you, J Wantling

Name: Judith Masey

Reference 176

Organisation

On Behalf Of

Type of Consultee Member of the public

maryott, kyle

From: Sent: To: Subject:

26 February 2016 14:38 policy, planning Issues & Options consultation Doc.

Follow Up Flag: Flag Status:

Follow up Flagged

To Catherine Smith Planning Manager – Policy.

HOUSING

North Kent SHENA Appendix 2 Influence of London.

At last it has been recognised through Migration data, that a lot of the new housing in Medway has been taken by people moving from London. (This in part because developers advertise in London.) A recent Mayor of London said they have sufficient land in London for their needs. When will homes be built locally for indigenous people first. Unless this happens local housing needs will never be met. Nor will localism be meaningful.

7.12 AFFORDABLE HOUSING .

I understand a profit is made after the 3rd home is built. So smaller developments could include some affordable homes.

SHMA has identified a high level of demand for affordable housing . Why cannot homes be built with less utilities included, as many were in the past, thereby making the homes more affordable to buy or rent. Occupants could then purchase contents as and when they could afford them, which would be more rewarding.

The overall housing figures are far too high for the area. We in Chartwell Close and Chatsworth Drive take our lives in our hands every time we exit onto the heavily trafficked Cooling Road Frindsbury, with impaired vision by vehicles parked both sides of the road, and it will get worse when the Temple Rise development is completed. I don't think BNE2 Amenity Protection is observed enough in planning.

ECONOMY

Employment Land.

8.13 It states Medway City Estate has poor quality public realm in parts. A pity Wardens lake was lost, as it was an asset to the estate and should have been saved, if policies had been observed; especially as the land does not appear to be used for what was applied for.

In the Development Strategy at 27.16 it states consideration could be given to redevelopment of the Estate.

8.22 Where would SME businesses relocate, as it states the Hoo Peninsula would be unlikely to be appropriate for office based or SME activity. If SME locate to Town Centre's (10.17 Retail) would retail business be jeopardized ?

The North side of Canal Road I feel is more suited for employment than housing. And Canal Road used one way only for vehicles leaving the Medway City Estate to help relieve the congestion at tunnel end of the estate. Buses to still be allowed two ways.

ENVIRONMENT

11.6 The eastern boundary of the Metropolitan Green Belt comes to the west of Stonehorse Lane which is north east of Strood not west as stated .

Question 31 In answer, build a pedestrian bridge (long promised) to connect Stonehorse Lane. GLC were requesting proposals for the spend of several millions for capital schemes in 2007/8 why was the bridge not proposed?

11.10 This would help fill some `gaps ' in the Public Rights of Way and help with the health of the community.

11.11 Action is needed to address INAPPROPRIATE DEVELOPMENT, reference disturbance and decline of Birds in the estuary. The same ACTION should be considered at Lodge Hill Chattenden.

BUILT ENVIRONMENT

12.7 Issues. SLAA Ref. 144

Strongly object to St Bartholomew's Hospital being listed as a suitable housing site. At the consultation in 1998/9 for redevelopment of the Hospital for community care, 99% of the people who responded supported the plans. Are the elderly not being considered? Surely it must help any bed blocking at the Maritime Hospital. It is also part of our built Heritage, something to point out to tourists during the open bus tours in the Summer.

RURAL ISSUES

13.2 All farmland should be protected. Diversify at times maybe, as long as it can revert back when needed.

Question 42. In answer, would appreciate Frindsbury extra Parish Council preparing a Neighbourhood Plan, as Cliffe & Cliffe Woods are doing, as this is how the Government wish Localism to work.

HEALTH

14.2 Please connect Stonehorse Lane as it leads into footpath 134 and onto 137. It would be nice to have a round walk in Frindsbury as in other areas. It is most unpleasant walking along the B 2000 beside a heavily trafficked road.

14.5 Save St Bartholomew's Hospital.

SOCIAL & COMMUNITY INFRASTRUCTURE.

15.2 Education.

Question 47. In answer, it was short sighted to allow housing development on Temple School grounds, when grounds should have been retained for future school use. I trust the playing field will be protected as stated at 7.5.12 of the 2003 local plan. Sad that so many of the trees will be lost due to the development.

OPEN SPACE

Issues.

16.7/.8 Surely open space sites cannot be declared surplus to requirement when there is an overall shortage. But if some sites are under used, possibly they could be used for other purpose as long as the site is revertible if needed, due to future levels of population growth and need for open space; especially as the standard of 3.25 ha per 1000 population is way below other districts. Developers and planners should observe 7.5.14 of Open Space Policy.

In a Community Strategy for Kent's natural environment, under Medway it states:- Continue to promote the development of a major regional park which benefits wildlife, people, and the local ECONOMY. Lodge Hill should be part of this. With Ebbsfleet being developed, green space will be important for that development and Medway's area of the Thames Gateway.

AGRICULTURAL LAND

Question 56. In answer, I am disturbed to read at 4.94 that NPPF is relaxing rules on agricultural land. ALL agricultural land should be protected. There is a substantial loss already to solar farms.

AIR QUALITY

19.3 The A228 should be noted , as some properties are only one metre from the road. Should restrict further development that would use the A228, especially through Frindsbury Road and Hill. The B2000 is also very unpleasant to walk along side due to traffic fumes and noise.

TRANSPORT

25.5 In the opportunities to enhance the network, please remember Stonehorse Lane.

25.6 The river should be used more ie. for conveyance of local goods.

25.9 Cycle lanes coming to an abrupt end is a problem.

25.10 Many would like to see parking paid on exit. Not to have to continually clock watch when shopping etc.

On street parking is a real problem, and will only get worse with car parks and garages being lost to development.

Some roads are no go areas, especially in the evenings.

An observation! Apparently the INSTITUTE of ECONOMIC AFFAIRS (IEA) say some traffic lights should be scrapped, as too many result in damage to the economy and environment. They also state just 2 minutes delay to every car journey cost the equivalent to 1% of UK GDP.

Afraid more issues than options! Judith Masey

FWCA mem . sec. & MCF member.

maryott, kyle

From:	George Jude Masey
Sent:	26 February 2016 15:59
To:	policy, planning
Subject:	Addendum to Issues & Options Doc.
Follow Up Flag:	Follow up
Flag Status:	Flagged
Categories:	Blue Category
To Catherine Smith Planning Manager –Policy.	

Missed off paragraph Sorry.

ECONOMY Employment Land. Medway City Estate.

8.25 With the future Government ruling that local council funding will come from business rates, Medway Council should resist the Government relaxing planning control enabling Employment land to be used for housing. Too much employment land has been used for housing in the past. Uncertainty could deter future business to the estate. Would just be a waste of finance.

Judith Masey

Name: Diana Baker

Reference 177

Organisation

On Behalf Of

Type of Consultee Member of the public

Have Your Say

Your Contact Details	
Name: MRS DI	ANA BARKUR
Email:	E S E E OF
Address:	
Would you like to be added to	our Local Plan contact database, so that we can let you know of
	ou informed of progress about the Local Plan?
Yes 🔲	No 🗖
Your views	
	y issues facing Medway over the next 20 years?
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THE HISY	ORIC BUILDING AT THE
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Contact Us

For more details about the Local Plan, please see: www.medway.gov.uk/planning.policy@medway.gov.uk Email: planning.policy@medway.gov.uk Telephone: 01634 331629 By post: Planning Service, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

Name: S.Hufton

Reference 178

Organisation

On Behalf Of

Type of Consultee Member of the public

Have Your Say

Your Contact Details	
Name: MR.S.HVFTO	>M
Email:	
Address:	
Would you like to be added to our I	Local Plan contact database, so that we can let you know of
	nformed of progress about the Local Plan?
Yes	No 🔲
Your views	
	ues facing Medway over the next 20 years?
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OVER POPULATED) AREA.
How should the local plan address	s these issues?
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Contact Us

For more details about the Local Plan, please see: www.medway.gov.uk/planningpolicy Email: planning.policy@medway.gov.uk Telephone: 01634 331629 By post: Planning Service, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

Name: John Myatt

Reference 179

Organisation

On Behalf Of

Type of Consultee Member of the public

Have Your Say

Your Contact Details		
Name: 50(40)	MUGATT.	
Email:		
Addre		
	IF LOCAL Plan contact database, so that we can let you know of	
consultation events and keep yo	informed of progress about the Local Plan?	
	No 🔲	

Your views
What do you think are the key issues facing Medway over the next 20 years?
HOUSING V JOBS IN AREA.
IF HOUSING FOR JOBS EZSWHERE
THEN TRANSPORT LINKS
ENVIRONTENTALITICT ON GREEN
AREAS RANGIN TREDUCAT.
How should the local plan address these issues?
Contact Us

 For more details about the Local Plan, please see: www.medway.gov.uk/planningpolicy

 Email: planning.policy@medway.gov.uk

 Telephone: 01634 331629

 By post: Planning Service, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

Name: AndrewWatson

Reference 180

Organisation Savills

On Behalf Of

Type of Consultee

Developer/Consultant



1" March 2016



Planning Policy Regeneration, Community & Culture Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR



Exchange House Petworth GU28 0BF

www.savills.com

Dear Sirs

Re: Medway Local Plan Consultation

Introduction

The Rochester Bridge Trust (hereafter referred to as the "Trust") would like to thank Medway Council for the opportunity to comment on the Issues and Options Local Plan (hereafter referred to as the "Plan"). As the strategic planning document that will shape the future of the area, it is an important document and one that needs to create the right balance of social, economic and environmental objectives.

The role it will play in future planning decisions will be critical, and it is important that the Plan successfully achieves this balance through its policies. It is also important the policies are flexible enough to allow landowners to respond to changing economic circumstances; and are proportionate to the amount and type of development proposed so that they do not create an unnecessary burden on new development. This will be key to achieving a successful and sustainable place.

Background the Rochester Bridge Trust

In 1381, a flood swept away Rochester's Roman bridge which had crossed the Medway for the previous 13

centuries. By 1391, sir John de Cobham and sir Robert Knolles had built a new stone bridge. They persuaded other benefactors to give land and property for the perpetual maintenance of the crossing and were, in effect, the founders of the Rochester Bridge Trust. Formally established by Richard II in 1399, the Trust continues to provide its bridges at Rochester at no cost to the public. All its income is derived from the original endowments.

Today, the Trust is a modern charity registered with the charity commission. It has a board of 12 unpaid trustees, informally known as the Bridge Wardens. Six of the trustees are nominated by Medway, Maidstone Borough and Kent county councils. The other six are appointed by the Trust for their skills and experience. They are supported by a small team of salaried part-time staff.

The Trust is a unique survivor of the medieval system of providing bridges. It is the only major independent bridge trust still serving its original purpose – to provide river crossings free of charge to the public. This purpose is supported by a long-term plan to maintain the bridges with careful planning and management. In addition to this, a series of educational initiatives are offered with the aim to inspire young people to gain the knowledge required to become the civil engineers – in particular bridge engineers – of the future. The Trust also makes grants for a range of charitable projects.

The Trust is also a landowner with a land portfolio that extends around Kent, including land in the Village of Cooling. The opportunities provided by the Trust's land are directly linked to the charitable purposes that the Trust performs.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Consultations on Local Plan

This section outlines the Trust's response to the Issues and Options Local Plan consultation.

Strategic Issues

Pages 16 -25 (strategic issues; and housing) recognise the need to provide new housing to meet the Objectively Assessed Need of 29,463 new homes. However, there is no mention of the important role that rural housing plays in supporting the vitality and viability of the Medway area. The recently published Rural Productivity Plan¹ (August 2015) sets out at Section 8 that:

"The government will increase the availability of housing in rural areas, allowing our rural towns and villages to thrive, whilst protecting the Green Belt and countryside" (page 19)

On 21st September 2015, the Government signalled its intention to build one million new homes by 2020. The housing minister, Brandon Lewis, projected a target of one million new homes in the next five years. He told the BBC's Inside Out programme: "By the end of this parliament, success would mean that we have seen a build in total of something like a million homes²". Much of the demand for the new houses will inevitably be in the south-east.

In light of Government's position, the Plan should recognise the important contribution that increasing the supply of rural housing can make to the rural economy and benefit of local communities to support thriving places. Increasing the overall supply of housing will also help to ensure that, the already overheated south-east housing market, can be tempered.

National Government's stance on housing policy also includes new initiatives such as the relaxation of permitted development rights under Class Q. This is likely to be supplemented through the recently announced Rural Planning Review³ (February 2016) which seeks to identify practical measures to reduce the planning burdens on providing rural housing.

Rural Housing

Pages 54 – 55 (Rural Issues) of the Plan do not make any provision for new housing as is set out in paragraph 55 of the NPPF. Paragraph 55 makes provision for new housing where it is not isolated and...

"...where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby."

It also permits isolated housing in situations where:

- the essential need for a rural worker to live permanently at or near their place of work in the countryside; or
- where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or
- where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or
- the exceptional quality or innovative nature of the design of the dwelling.

The intention of paragraph 55 is to promote sustainable housing development in rural areas, and should be read in the context of paragraph 47 of the NPPF, which sets out a clear need '*To boost significantly the supply of housing*...'.

2 http://www.theguardian.com/society/2015/sep/21/1m-more-homes-in-england-by-2020-government

¹ <u>https://www.gov.uk/government/publications/towards-a-one-nation-economy-a-10-point-plan-for-boosting-rural-productivity</u>

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/499246/Rural_panning_review_Call_for_Evidence.pdf



Given the housing need in the south-east, rural housing can make a valuable contribution to this overall need. Opportunities to provide rural housing are compliant with paragraph 55 of the NPPF and should be recognised within the relevant policies. This includes the contribution housing can make towards social and economic infrastructure within villages.

Site in Cooling

The site owns land in the Village of Cooling, which they are promoting through the Local Plan process. The Trust is currently undertaking a number of technical assessments to demonstrate the site's suitability. It has been agreed with officers that these will be submitted at the end of March.

Conclusion

The Trust would also like to thank Medway Council for the opportunity to comment on and influence this important emerging planning policy. Finally, should officers want to meet with the Trust and its representatives to discuss this letter, we would be more than happy to do so.

Yours Sincerely

Andrew Watson • MRTPI Associate Planner e

CC - Tim Cathcart, Savills

Name: Phil Taylor

Reference 181

Organisation Arcelormitttal Kent wire

On Behalf Of

Type of Consultee

Business

From: Phil Taylor Sent: 24 February 2016 16:24 To: harris, dave Subject: Medway Council Local Plan Issues and Options Consultation

Dave

It was good to see you and your team yesterday and I was grateful for the opportunity to be involved with discussions regarding the work you are doing in connection with the Local Plan for Medway.

I took away from the meeting the importance of a robust and sustainable infrastructure to support development plans and the importance of keeping employment land.

I am passionate about protecting what remains of Chatham Docks, and strongly urge you to protect Chatham Docks and the other remaining working wharves along the river and hope this is something that can be achieved by you and your team.

I trust my input has been useful and I remain at your disposal should you need my help,

Please let me know if my comments here are sufficient or whether they should be uploaded to anther site in the Planning Policy Portal

Kind regards

Phil Taylor | CEO ArcelorMittal Kent Wire

Chatham Docks, Chatham, Kent ME4 4SR, United Kingdom arcelormittalkentwire.co.uk

Name: Barbara Cummins

Reference 182

Organisation

On Behalf Of

Type of Consultee Member of the public



Catherine Smith Planning Project Manager Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

MEDWAY COUNCIL FILE REF 1 5 MAR 2016 TO: ACTION:

10th March 2016

Dear Ms Smith

Medway Local Plan 2012-2035 – Land identified Rectory Road Cliffe ME3 7RP

Following a meeting with a representative from each house in Rectory Road last week, I am writing on their behalf to express their strong views to any proposed development that will change our hamlet.

I have been in contact with English Heritage who have forwarded our concerns to Historic England. I was also advised to contact Medway Conservation Officer, hence my contact with Mr Mckay, Conservation Officer at Medway Council. Following a conversation with him this week, he advised that I bring to your attention the following issues regarding the land identified at Rectory Road for housing.

I refer to the assessment document 1075 Rectory Road made on the land which appears to have been graded without consideration to the listed buildings sited on and near the piece of land. In the middle of the identified land, a listed Rectory House Grade II star, and facing the proposed land a Grade II listed barn, Buckland Farm, Buckland Road. The heritage section on the assessment has been graded as green but due to these two listed buildings and their surroundings we believe the grade should have been red.

The particular issues raised refers to The Rectory House an important part of Cliffe's history. Situated between Cliffe and Cliffe Woods, a hamlet with 5 dwellings all linked to the listed Rectory. The Coach House and Rectory Cottages, 3 houses, in the mid/late 1800's these housed domestics and a laundry to the Rectory, also in the gardens of the Rectory and Coach House are some important trees, a housing development would affect the character of the buildings appearance and surroundings.

At the present time the land is outside the village envelope so has been to some extent protected from certain planning/building. However future developments could extend the village boundaries which will change the little protection this status gives.

Page 2

It is therefore important that we look to the future to protect this unique area. I did discuss conservation as a way forward with Mr McKay, if this could protect the area it would be an option for the residents to consider.

The residents understand that the present overall red status in the assessment classes the land as unsuitable for development; however it is felt with the points raised the re-assessment of grades would reflect the heritage and as a result would strengthen the case of unsuitable.

I am also attaching a copy of the letter which is to be signed by the residents of Rectory Road, Buckland Road and Station Road, Cliffe, to have they say about the proposals for Cliffe and Cliffe Woods and in particular Rectory Road.

I would be grateful for your comments and advice regarding the points I have raised. Please do not hesitate to contact me if you require any further details. Thank you for your assistance in this matter.

Yours sincerely

Barbara Cummins (Mrs)

On behalf of the residents of Rectory Road Cliffe

CC to Mr Martin McKay Conservation Officer Medway Council

CC to Cliffe & Cliffe Woods Parish Council

Medway Council Local Plan 2012 -2035

Cliffe and Cliffe Woods

We the undersigned residents of Rectory Road ;Buckland Road; Station Road Cliffe would like to express the following regarding land identified in Cliffe and Cliffe Woods for future housing development:

- Poor notifications of the meetings held in Cliffe and Cliffe Woods
- "Have your say" fliers posted to each household not clear the impact of 29000 new homes would have on homeowners
- Listed Buildings
- Detrimental to impact on landscape
- The land identified will change the environment of our semi rural villages
- Our Houses blighted
- Village boundaries will change
- Flood gates will open for other land owners to develop other plots of land
- Change our countryside environment
- B2000 is a country road already not fit for purpose
- B2000 safety issues in parts not wide enough for 2 vehicles to pass
- Noise pollution with increased traffic
- Pollution with increased traffic
- Damage to houses from traffic vibrations
- Doctors surgery already struggling to deliver services to patients- with waits up to 3 weeks for appointments
- Schools would not be able to accommodate the proposed influx of residents
- Protect our countryside
- Wildlife
- No main drains
- Overhead Electricity power cables
- Overhead telephone cables
- Access roads unsuitable
- Rectory Road (formerly Old Rectory Road) privately owned with public use

LAND IDENTIFIED - RECTORY ROAD CLIFFE

We refer to the assessment on this lands suitability for development; it would appear that some sections have been coded without sufficient information to conclude a relevant code. A review of these sections should change the grading and as a consequence strengthen the overall red grading .. <u>unsuitable for development</u>.

Suitability – General coded amber – please review

*B2000 – is a country Road unsuitable for increased traffic

Site Access- coded amber – please review

*Not suitable - a privately owned road with public access

Ecological Potential/Designated Habitats -

*Further investigation needed

Landscape – coded green – please review

*The site is not located in a built up area : 5 dwellings in total The Rectory Grade II * listed The Coach House Rectory Cottages Any housing development would have a detrimental impact on the landscape

<u>Heritage coded – green – please review</u>

The land that has been identified wraps around The Rectory a Grade II* listed building, in a hamlet where the dwellings are related. The land also backs onto Buckland Road in front of a Grade II listed Barn at Buckland Farm; any development would affect the setting of the listed buildings surrounding area and change the character and appearance of the area Historic England have been approached for their support regarding the proposal

Further issues regarding the area to be taken into account:

CCccOverhead electricity power and telephone cables, no main drain sewage would deem the land unsuitable for any further development.

The Hoo peninsula has just come through a phase of blighted homes due to Cliffe Airport, we now will face the same scenario until the council can provide a list of land selected for development and removing areas that will not be developed.

Wildlife - The surrounding fields are a habitat to many rare species, slow worms, lizards, stag beetles and snakes. Lots of butterflies and moths, also cuckoo's nest every spring and at least three types of woodpeckers, little owls and many songbirds nest in the hedges.

To be signed by the residents of Rectory Road, Station Road and Buckland Road Cc Catherine Smith Planning Project Manager Medway Council Cc Mr Martin McKay Conservation Officer Cc Cliffe & Cliffe Woods Parish Council

Name: Nigel DeWit

Reference

183

Organisation

Tonbridge and Malling Borough Council

On Behalf Of

Type of Consultee

Government/Public Body

From: Nigel DeWit Sent: 21 March 2016 14:11 To: smith, catherine Cc: Subject: Medway Local Plan: Issues and Options Consultation

Good afternoon Catherine,

Further to my e-mail of 29 February 2016, please find below officer-level comments on the Medway Local Plan: Issues and Options Consultation. These comments are responses to consultation questions 4 and 5. I would be grateful if you could acknowledge receipt of these comments. Thank you.

4. Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

TMBC Officer-level response: The conclusion on the appropriate Housing Market Area (HMA) for Medway is questioned in light of the evidence presented and taking into account recent Strategic Housing Market Assessments prepared by neighbouring authorities including Tonbridge & Malling Borough Council (TMBC).

In light of the evidence on property values including median house prices (see Table 15 and paras.2.87 and 2.101 in the Strategic Housing Market Assessment (SHMA)) and detailed analysis of travel to work patterns and commuting (see para.2.98 in the SHMA), it is considered that including the whole of Tonbridge & Malling Borough in the Medway HMA is an over-simplification that does not accurately reflect the strengths of relationships between Medway and the surrounding areas.

The SHMA on more than one occasion identifies that the strong links with Tonbridge & Malling occur only within the northern parts of that Borough. This is summed up in para. 2.104 of the SHMA. If the evidence points to clear splits across neighbouring authority areas then this should be reflected in the final conclusion on the HMA. Unless the SHMA points to the rest of TMBC sharing similar characteristics in terms of market values and travel to work patterns and commuting then the middle and southern parts of TMBC should not be covered by the Medway HMA.

This more refined analysis would also be more consistent with the conclusion on HMAs exerting an influence over Tonbridge & Malling Borough in the TMBC SHMA.

5. What do you consider to be the appropriate housing market area for Medway?

TMBC Officer-level response - A more appropriate HMA for Medway would exclude the majority of Tonbridge & Malling Borough with the exception of the northern reaches. Para. 2.101 in the SHMA identifies these northern reaches as being those areas north of the London-Maidstone rail line. This is borne out by the evidence on property values (including medium house prices) and detailed analysis of travel to work patterns and commuting which identifies that the strong links with TMBC do not extend below the northern part of that borough closest to Medway. This would be more consistent with the conclusion on the HMAs exerting an influence over Tonbridge & Malling Borough in the TMBC SHMA. Please see response to question 4 (above).

Kind regards,

Nigel De Wit Senior Planning Officer (Policy)



Name: Martin Page

Reference 184

Organisation dha Planning

ulla Flailling

On Behalf Of The John Hinge Will Trustees

Type of Consultee

Developer/Consultant



Planning Policy Section Medway Council Gun Wharf Dock Road Chatham Kent, ME4 4TR 2 4 MAR 2016

23rd March 2016

Our Ref: MFP/GH/10058

Dear Policy Team

RE: MEDWAY LOCAL PLAN- EXTENDED CONSULTATION ON HOUSING AND OTHER EVIDENCE CLOSING (24.03.16) REPRESENTATIONS ON BEHALF OF THE JOHN HINGE WILL TRUSTEES AND OTHERS

Please find attached out comments on the Strategic Housing Market Assessment published in support of the issues and options consultation document. I understand these comments will be recorded and taken into account as part of the information gathered through the Local Plan issues and options consultation and thank you in advance for your consideration.

Yours sincerely

Martin Page

Enc. Representations Document

dha planning Eclipse House, Eclipse Park, Sittingbourne Road Maidstone, Kent ME14 3EN

t: 01622 776226 f: 01622 776227







MEDWAY LOCAL PLAN – EXTENDED CONSULATION ON HOUSING EVIDENCE (CLOSING 24.03.16)

REPRESENTATIONS ON BEHALF OF THE JOHN HINGE WILL TRUSTEES AND OTHERS

1.1 Introduction

- 1.1.1 The Trustees made representations in February 2016 in response to the Local Plan Issues and Options Consultation. Their interest is in bringing forward the land at Brompton Farm (SLAA Site 0729) for housing development.
- 1.1.2 These comments are made in response to the invitation to comment on the housing evidence published just after the above consultation, with a deadline of 24th March 2016. We trust these are self-explanatory and look forward to the Council's next steps in preparation of the Local Plan.

1.2 Access to Housing – Delivery Constraints

- 1.2.1 The SHMA Final Report Nov 2015 states on pages 118/119 that there has been persistent underperformance in housing completions relative to the former (S.E. Plan-based) housing targets. This accords with our assessment that Medway Council presently need an enhanced buffer level when considering how best to deliver higher annual completions.
- 1.2.2 In accordance with general NPPF requirements and the tests of soundness to be applied to the Local Plan, the critical issue of housing delivery must be dealt with in the Draft Local Plan, when published.
- 1.2.3 The under-delivery of housing has in our view not only affected price (scarcity of supply being referred to in para 5.119 of the SHMAA report) but also the suppression of migration and related trends which are now relied upon in the SHMAA demographic calculations. There is a danger that the historic under-delivery of housing in Medway may have a self-fulfilling effect on the components of the OAN.

1.3 AMR 2014

1.3.1 The table provided in the Annual Monitoring Report 2014 demonstrated that between 1991 and 2014, the Council had met their annual housing target a total of just 3 times out of a possible 23 occasions. Altogether, the Council has accepted that it has underdelivered by a total of 4,286 dwellings against a requirement of 20,125 (23.3% underdelivery). This does not however reflect the increased housing needs figures as set out below.

Year	Target	Delivery	Difference	% Difference
2013/14	1,277	579	-698	55%
2012/13	1,277	566	-711	56%
2011/12	1,000	809	-191	19%
2010/11	815	657	-158	19%
2009//10	815	957	157	+19%
2008/09	815	914	99	12%
2007/08	815	761	-54	7%
2006/07	815	591	-224	27%



Total	20,125	15,842	-4,287	21.3%
1991/92	900	825	-75	8%
1992/93	900	769	-131	15%
1993/94	900	669	-231	26%
1994/95	900	546	-354	39%
1995/96	900	644	-256	28%
1996/97	900	598	-302	34%
1997/98	900	702	-198	22%
1998/99	900	698	-202	22%
1999/00	900	719	-181	20%
2000/01	900	603	-297	33%
2001/02	700	603	-97	14%
2002/03	700	676	-24	3%
2003/04	700	733	33	+5%
2004/05	700	646	-54	8%
2005/06	700	562	-138	20%

Housing delivery since 1991 (Source: Medway Council AMRs)

- 1.3.2 In respect of the Council's failure to meet the housing requirements in ten out of thirteen of the most recent years, this is a persistent failure in deliver.
- 1.3.3 It is particularly important to note that delivery rates over the last two years have been considerably lower, demonstrating an under delivery of approximately 55% and a total of 1,409 dwellings over the two years. This is a particular concern as the economy has been buoyant during this period. This confirms that there is a significant shortfall in housing delivery and a need to deliver new housing throughout the Council area.

1.4 Approach to the shortfall

1.4.1 If adopting the 2012-household projections as the method for delivery for the period 2012 to 2014, the shortfall increases to 1,600 dwellings over the same period. The tables below set out the relative shortfalls depending on the annual target specified:

Year	Target	Delivery	Difference
2013/14	1,000	579	-421
2012/13	1,000	566	-431
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Total	3,000	1,954	1,046

Housing shortfall based on the interim housing target (June 2014)

Year	Target	Delivery	Difference
2013/14	1,277	579	-698
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2011/12	1,000	809	-191
Total	3,554	1,954	1,600

Housing shortfall based on 2012 household projections

1.4.2 The Council have stated that for the period of 2012 to 2014, the annual requirement should be based on 1,277 per annum. On this basis, the shortfall by 31st March would be 1,600.



1.5 AMR 2015 – Continued Underperformance

- 1.5.1 We intend to update the figures on housing delivery at the time we respond to the Draft Local Plan but the most recent (2015) AMR shows that 483 completions out of the target 1000 were completed.
- 1.5.2 The prospects for an increase in the annual completion rate are doubtless affected by a range of factors but housing allocation and delivery has to be central to the Local Plan if it is to be seen as positively prepared.

1.6 The Council's Supply Assumptions

- 1.6.1 The Council's 2013/14 Annual Monitoring report published in December 2014 set out the five year housing land supply position and a housing land trajectory setting out the Council's version of the expected delivery rates of identified housing development sites in Medway. In the 2014/15 AMR reviewing development activity in Medway from April 2014 to March 2015, the published SLAA of January 2014 has still been used as the reference point, presumably for reasons of information availability given the date of the 2015 call for sites.
- 1.6.2 We do not accept the conclusions of that document and consider the 2015 SLAA call for sites information needs to be used. In particular it needs to be addressed positively to provide for enhanced availability including a wide variety of sites and an emphasis on delivery.

1.7 Our approach to the five year housing supply

- 1.7.1 Our main reason for rejecting the housing trajectory shown in the AMR is that the Council has assumed that all identified sites will be delivered within the plan period.
- 1.7.2 This annual requirement to meet the OAN is very high, especially when considered against the Council's supply in 2012/2013, in 2013/2014 and 2014/15 of just 566, 579 and 483 units. According to the AMR 2014, in order for a site to be considered as part of the identified five year housing supply, it must meet the following criteria:
 - Have the benefit of planning consent or allocation in a development plan and are considered to be capable of delivering at least some of the housing in the five year period; or
 - Sites without a planning consent or allocation must have a robust, up-to-date evidence base to support their delivery
- 1.7.3 In order to highlight the scale of Medway's housing supply problem, we draw reference to an example, upon which the Council relies for even short term delivery. This is not to say that we do not support delivery on some such a sites, just that we do not accept the rate and timing of delivery.

Example- The Delivery of Lodge Hill

1.7.4 Since the publication of the AMR 2014, the Secretary of State has called in the application due to the sensitive location of the site, being designated as a Site of Special Scientific Interest (SSSI). The grant of planning permission on such a site is likely to be highly



controversial and likely to be challenged by way of a judicial review, further delaying potential delivery of the site. The development also requires the delivery of the necessary infrastructure and likely build out rates are in our view, significantly below 300 dwellings per annum.

- 1.7.5 It is unlikely that a decision will be granted before Autumn 2017 and any delivery is of course dependent on whether the development is granted. The AMR 2014 identifies the site as being able to provide 5,000 dwellings, 1,000 of which are expected to be delivered within the first five years. The delivery rate was provided by the developers (Land Securities) who have since withdrawn from the project due to uncertainties and no further assessment has been undertaken by the Council. It is therefore submitted that without robust evidence, it is unlikely that the site could deliver any dwellings within three years and indeed, may not deliver any units for 5-10 years.
- 1.7.6 We are therefore of the opinion that the 1,000 dwelling allocation should be removed from the five year supply calculations, further undermining the Council's five year housing supply. The effect on the housing trajectory set out in the 2015 AMR shows that there is little hope that the trajectory will be met in the short term. Further, the lack of solid longer term sources of supply represents a large hole that the Plan must fill though a generous range of sizes and types of deliverable sites. Such new development needs to demonstrate that it is sustainable both in terms of location, transport and construction, etc. and also that it would not cause significant visual harm (all other material considerations also apply).
- 1.7.7 The Council should explain whether it intends to apply a 5% or 20% buffer to the five year land supply calculation and whether it considers the Liverpool or Sedgefield approach to be more appropriate for addressing any under-supply accumulated. In our view a 20% buffer is required.

1.8 Duty to Cooperate – Housing

- 1.8.1 The SHMAA explains the rationale for identification of the HMA boundary. It also assesses the locations of in and out migration. For the Plan to be sound it must be shown that the duty to cooperate has been effectively utilised to address any identified but unmet development needs. This extends to areas that, whilst not in the top few principal locations for in-migration, are nevertheless sources of population growth. This means a number of London Boroughs in particular.
- 1.8.2 The recommended increase in supply to account for migration from London across the HMA must also be considered adequate by the Mayor of London and the London boroughs. Medway is required to engage with the Mayor of London as per the NPPG at para 007.
- 1.8.3 In summary the Council should thus show that cooperation has taken place throughout the preparation of the local plan, i.e. before the local plan's submission. The Council is required to show how consideration of cross boundary issues has informed the development of the plan. This includes working with authorities in the HMA and also with the London boroughs. The question is also whether they are able to meet their own OANs in full. If they cannot, then the duty to cooperate will not have been effective. Our concern is that the notion in the SHMAA that Medway is


relatively self-contained as a HMA in our view builds in the suppressive effects of chronic under-supply that have been identified.

- 1.8.4 We also have noted that in respect of the Maidstone Local Plan the HBF considers that an adjustment to compensate for the Mayor of London's migration assumptions is essential in all the authorities of the wider south east (the former South East and East of England regions) but especially those districts with strong housing market and commuting links with London. The HBF are of the view that the relevant HMA there falls into this category and it states that Maidstone must make provision for the Mayor's migration assumptions because of the size of the difference between the Mayor's own baseline demographic starting point which is 39,500 households per year for London as a whole and the DCLG's 2011-interim Household Projections that indicated that 52,000 households would form each year.
- 1.8.5 This means that the Mayor is assuming that some 12,500 households a year will not have to be accommodated in London as more will move out and fewer will come. This is explained in the GLA's 2013 SHMA that was produced to support the new London Plan (see paragraph 3.69 and figure 29 of the GLA SHMA 2013). The unmet London housing need is a further driver of need that is rising.

1.9 Conclusions

- 1.9.1 There is an accepted critical under delivery of housing in Medway that continues.
- 1.9.2 The suppressive effects of under delivery upon housing and population indicates a danger that the OAN is building-in a legacy of underperformance and the SHMAA an exaggerated level of self-containment in the HMA. This raises a need for wide cooperation particularly with London.
- 1.9.3 The Local Plan must show a wide variety of deliverable and sustainable sites in order to turn these trends round. A 20% buffer in the first 5 years is appropriate and the assumption that all sites are deliverable (including Lodge Hill) shows a lack of a realistic and positive response to the critical issue at stake. In order to provide a sound plan the range of housing sites needs to be widened and geared to delivery.

Name: Bill Temple-Pediani

Reference 185

Organisation KTI Energy Limited

On Behalf Of

Type of Consultee Business

maryott, kyle

From: Sent: To: Subject:

18 March 2016 14:50 policy, planning Representation to Medway Local Plan

Follow Up Flag: Flag Status: Follow up Flagged

Dear Sir/Madam,

Forgive this late representation because I was in hospital throughout February 2016.

In answer to Question 60 on waste, my company suggests you liaise with Kent County Council on its Kent Minerals & Waste Local Plan. The proposal put in 2015 to the County Council at the EiP is that its household and non-household waste is converted to waste derived fuel for delivery to EbbCHP, a generator intending to supply low carbon electricity and heat to Ebbsfleet Garden City.

The proposal put to Medway Council is that it considers employing Veolia to develop a waste processing plant capable of converting its 120,000 t/a household waste to fuel, if not also converting at least an equal tonnage of non-household waste to fuel, also for delivery to EbbCHP.

We have in the past suggested Kingsnorth might be an appropriate location at which to base such processing plant. However, the policy of my company as expert power project developer is not to interfere with an ongoing waste disposal contractual relationship as Medway Council has with Veolia.

Sincerely

Dr Bill Temple-Pediani Managing Director



Name: Geoff Tipping

Reference 186

Organisation

On Behalf Of

Type of Consultee Member of the public

maryott, kyle

From: Sent: To: Subject:

23 March 2016 13:44 policy, planning Development of Farm Land in Cliffe Woods

Follow Up Flag: Flag Status:

Follow up Flagged

Good afternoon

It has been brought to my attention by a neighbour that there are plans to build some 500 new dwellings on farm land adjacent to the B2000 and backing onto Ladyclose and Mortimers Avenue. Whilst it is important that new housing is built to accommodate a growing population I do have some concerns relation to such a large development of farm land in this location which would in effect double the size of Cliffe Woods.

I am a resident of Mortimers Avenue and moved there 3 years ago because of its location and the very quiet and friendly nature of the village, it would be a shame for the whole feel of the village to be lost.

My concerns/questions are as follows:

1) living in a road adjacent to the land proposed for development I was surprised to hear that meetings had been held to discuss such plans but had not been directly notified to the small number 50 or so houses in the two roads which would be affected most. Why was this ?

2) I believe that there is some proposal for access via Ladyclose and Mortimers Avenue, these are private and very narrow streets - would some compulsory purchase have to be enacted for this to happen ?3) If 500 dwellings were to be permitted what safeguards would there be to protect existing property from the inevitable increase of vandalism and crime commonly experienced when social housing is introduced to an area. I believe that all new developments have to have an element of social housing ?

4)What if any green space would be planned between the two existing roads and the new development ?

The 4 items above are more about the impact this development may have on me personally however of greater concern is the loss, and it would be a permanent loss, of even more farm land in this area and the impact that would have for our environment as a whole.

I am sure that you are well aware of the need for green space for the quality of air and other environmental aspects as this is mentioned in the development plan document. There would be an impact on the wildlife in the area which again could mean the permanent loss of certain wildlife to the area.

If the Lower Thames crossing also goes ahead then the amount of extra pollutants in the air would require more green space to maintain air quality not less.

I am sure there is much more that I should be writing to explain my concerns but have come to the party rather late and understand that the closing date for representations is tomorrow and dont want to miss the deadline.

Kind Regards Geoff Tipping

Name: Mark Jackson

Reference 187

Organisation Cushman & Wakefield

On Behalf Of Uniper UK Limited

Type of Consultee

Developer/Consultant



1 Colmore Square Birmingham B4 6AJ

cushmanwakefield.co.uk

23rd March 2016

Medway Council Gun Wharf Dock Road Chatham Kent ME4 4TR

Dear Sir/Madam,

MEDWAY LOCAL PLAN ISSUES AND OPTIONS CONSULTATION JANUARY - MARCH 2016

Cushman and Wakefield is instructed by Uniper UK Limited to respond to the Medway Local Plan Issues and Options consultation document. The comments relate specifically to the two Power Stations Uniper own located the Hoo Peninsula – Grain Power Station and Kingsnorth Power Station.

Grain and Kingsnorth Power Station Sites

The Grain Power Station site extends to approximately 100 hectares and comprises an operation gas fired power station (known as Grain B) and a substantial amount of electricity transmission and associated site infrastructure. The original power station (known as Grain A) is under demolition and at present there is a substantial amount of vacant land within the power station site.

The Kingsnorth Power Station site extends to approximately 190 hectares and comprises a substantial amount of electricity transmission and associated site infrastructure. The power station facilities on site and are under demolition and there is a substantial amount of vacant land within the power station site. The site also benefits from access to the river Thames.

The existing site infrastructure means that both sites are capable of accommodating new energy generation facilities from large scale to micro generation. Uniper continually review power development options and it is likely that new proposals will be put forward at the sites during the plan period.

It is possible that future energy generation facilities will require less land than the previous generation facilities, as is typical of modern energy generation proposals. This creates the potential for surplus land to become available within the sites over the plan period. If surplus land is identified it could make a significant contribution to the provision of employment land in Medway. Such land would benefit from existing site infrastructure with access to road and water (in the case of Kingsnorth) and potential to benefit from energy generated on site. The sites are largely remote from sensitive uses and as such are capable of accommodating industrial uses that would typically not be supported in urban areas.

Economic Land Needs Assessment (December 2015)

The Economic Land Needs Assessment (ELNA) evaluates the two power station sites as part of a comprehensive assessment of all employment sites in Medway. Both sites have been allocated as general employment sites within each of the recent Medway Local Plans whereby light industrial uses - Class B1(c),

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DTZ Debenham Tie Leung Limited Registered in England No 2757768.



general industrial uses – Class B2 and storage and distribution uses – Class B8, are supported in principle subject to matters of detail.

The ELNA considers both sites and concludes that:

- The level of flood risk is considered acceptable for commercial uses
- There are some potential development constraints which could be resolved (such as noise pollution) subject to further assessment.
- In terms of amenity the sites are established employment areas.
- Overall the suitability of both sites for employment uses is considered to be good.

The ELNA highlights the key risk to both sites is availability and states that "the landowner is not promoted the site for redevelopment and seeking energy development only".

Whilst it is the case that Uniper, an energy company, is not promoting either site for redevelopment to alternative employment uses at present, we consider the sound planning approach in relation to the sites is to retain in principle policy support for general employment development on both sites. The independent assessment of the sites suitability for employment use confirm the sites offer significant potential as both energy generation sites and general employment sites.

We respectfully request that the emerging Medway Local Plan retains a flexible employment policy on the site, which positively plans for any potential change over the plan period.

We include below a response to specific questions included within the Issues and Options consultation, which relate to the comments above.

Medway Local Plan Issues and Options Questions

Question 15 - Where should such [employment] sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?

The National Planning Policy Framework (NPPF) requires plans amongst other things to:

- Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.
- Encourage the redevelopment of previously developed land

Uniper considers that the Medway Local Plan should consider the opportunities for delivering employment land within existing employment areas and be flexible to changing circumstances recognizing the length of the plan and some of the existing infrastructure assets available within existing sites.

18) How can Medway realise opportunities to capitalise on growth in the wider area, including London?

The ELNA identifies opportunities for growth in the region as resulting from a projected increase in jobs; the district's strategic location; regional logistics growth; price pressures in London leading to increased demand for office space; growing London commuter population; growing student population; securing activity from sectors growing across the wider South East; regeneration sites; and an additional Thames Crossing.



Uniper considers that the Medway Local Plan should allow flexibility for existing employment sites to be redeveloped if they become available later in the Plan period, to ensure a good supply of larger and well-connected sites are available to accommodate growth predicted in Medway.

21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

Uniper considers that the Medway Local Plan should recognise the potential of sites with existing specialist infrastructure and plan positively to maximise the opportunity of such infrastructure should it become available during the plan period.

I trust the information provided within this response is helpful and I welcome the opportunity to meet with your authority to discuss the two power station sites in more detail.

Please do not hesitate to contact me if you have any questions. I look forward to hearing from you.

Yours faithfully,

Mark Jackson MRTPI Director

Name: Danielle Ingleston

Reference 188

Organisation dha Planning

On Behalf Of Heritage Design

Type of Consultee

Developer/Consultant



MEDWAY LOCAL PLAN – EXTENDED CONSULATION ON HOUSING EVIDENCE (CLOSING 24.03.16)

REPRESENTATIONS ON BEHALF OF HERITAGE DESIGN AND DEVELOPMENT TEAM LTD

1.1 Introduction

- 1.1.1 We made representations previously in respect of the Council's "Call for Sites" in respect of the land at Manor Farm, Frindsbury.
- 1.1.2 These comments are made in response to the invitation to comment on the housing evidence published just after the above consultation, with a deadline of 24th March 2016. We trust these are self-explanatory and look forward to the Council's next steps in preparation of the Local Plan.

1.2 Access to Housing – Delivery Constraints

- 1.2.1 The SHMA Final Report Nov 2015 states on pages 118/119 that there has been persistent underperformance in housing completions relative to the former (S.E. Plan-based) housing targets. This accords with our assessment that Medway Council presently need an enhanced buffer level when considering how best to deliver higher annual completions.
- 1.2.2 In accordance with general NPPF requirements and the tests of soundness to be applied to the Local Plan, the critical issue of housing delivery must be dealt with in the Draft Local Plan, when published.
- 1.2.3 The under-delivery of housing has in our view not only affected price (scarcity of supply being referred to in para 5.119 of the SHMAA report) but also the suppression of migration and related trends which are now relied upon in the SHMAA demographic calculations. There is a danger that the historic under-delivery of housing in Medway may have a self-fulfilling effect on the components of the OAN.

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Housing delivery since 1991 (Source: Medway Council AMRs)

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Housing shortfall based on 2012 household projections

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- 1.7.1 Our main reason for rejecting the housing trajectory shown in the AMR is that the Council has assumed that all identified sites will be delivered within the plan period.
- 1.7.2 This annual requirement to meet the OAN is very high, especially when considered against the Council's supply in 2012/2013, in 2013/2014 and 2014/15 of just 566, 579 and 483 units. According to the AMR 2014, in order for a site to be considered as part of the identified five year housing supply, it must meet the following criteria:
 - Have the benefit of planning consent or allocation in a development plan and are considered to be capable of delivering at least some of the housing in the five year period; or
 - Sites without a planning consent or allocation must have a robust, up-to-date evidence base to support their delivery
- 1.7.3 In order to highlight the scale of Medway's housing supply problem, we draw reference to an example, upon which the Council relies for even short term delivery. This is not to say that we do not support delivery on some such a sites, just that we do not accept the rate and timing of delivery.

Example- The Delivery of Lodge Hill

1.7.4 Since the publication of the AMR 2014, the Secretary of State has called in the application due to the sensitive location of the site, being designated as a Site of Special Scientific



Interest (SSSI). The grant of planning permission on such a site is likely to be highly controversial and likely to be challenged by way of a judicial review, further delaying potential delivery of the site. The development also requires the delivery of the necessary infrastructure and likely build out rates are in our view, significantly below 300 dwellings per annum.

- 1.7.5 It is unlikely that a decision will be granted before Autumn 2017 and any delivery is of course dependent on whether the development is granted. The AMR 2014 identifies the site as being able to provide 5,000 dwellings, 1,000 of which are expected to be delivered within the first five years. The delivery rate was provided by the developers (Land Securities) who have since withdrawn from the project due to uncertainties and no further assessment has been undertaken by the Council. It is therefore submitted that without robust evidence, it is unlikely that the site could deliver any dwellings within three years and indeed, may not deliver any units for 5-10 years.
- 1.7.6 We are therefore of the opinion that the 1,000 dwelling allocation should be removed from the five year supply calculations, further undermining the Council's five year housing supply. The effect on the housing trajectory set out in the 2015 AMR shows that there is little hope that the trajectory will be met in the short term. Further, the lack of solid longer term sources of supply represents a large hole that the Plan must fill though a generous range of sizes and types of deliverable sites. Such new development needs to demonstrate that it is sustainable both in terms of location, transport and construction, etc. and also that it would not cause significant visual harm (all other material considerations also apply).
- 1.7.7 The Council should explain whether it intends to apply a 5% or 20% buffer to the five year land supply calculation and whether it considers the Liverpool or Sedgefield approach to be more appropriate for addressing any under-supply accumulated. In our view a 20% buffer is required.

1.8 Duty to Cooperate – Housing

- 1.8.1 The SHMAA explains the rationale for identification of the HMA boundary. It also assesses the locations of in and out migration. For the Plan to be sound it must be shown that the duty to cooperate has been effectively utilised to address any identified but unmet development needs. This extends to areas that, whilst not in the top few principal locations for in-migration, are nevertheless sources of population growth. This means a number of London Boroughs in particular.
- 1.8.2 The recommended increase in supply to account for migration from London across the HMA must also be considered adequate by the Mayor of London and the London boroughs. Medway is required to engage with the Mayor of London as per the NPPG at para 007.
- 1.8.3 In summary the Council should thus show that cooperation has taken place throughout the preparation of the local plan, i.e. before the local plan's submission. The Council is required to show how consideration of cross boundary issues has informed the development of the plan. This includes working with authorities in the HMA and also with the London Boroughs. The question is also whether they are able to meet their own OANs in full. If they cannot, then the duty to cooperate will not have



been effective. Our concern is that the notion in the SHMAA that Medway is relatively self-contained as a HMA in our view builds in the suppressive effects of chronic undersupply that have been identified.

- 1.8.4 We also have noted that in respect of the Maidstone Local Plan the HBF considers that an adjustment to compensate for the Mayor of London's migration assumptions is essential in all the authorities of the wider south east (the former South East and East of England regions) but especially those districts with strong housing market and commuting links with London. The HBF are of the view that the relevant HMA there falls into this category and it states that Maidstone must make provision for the Mayor's migration assumptions because of the size of the difference between the Mayor's own baseline demographic starting point - which is 39,500 households per year for London as a whole - and the DCLG's 2011-interim Household Projections that indicated that 52,000 households would form each year.
- 1.8.5 This means that the Mayor is assuming that some 12,500 households a year will not have to be accommodated in London as more will move out and fewer will come. This is explained in the GLA's 2013 SHMA that was produced to support the new London Plan (see paragraph 3.69 and figure 29 of the GLA SHMA 2013). The unmet London housing need is a further driver of need that is rising.

1.9 Conclusions

- 1.9.1 There is an accepted critical under delivery of housing in Medway that continues.
- 1.9.2 The suppressive effects of under delivery upon housing and population indicates a danger that the OAN is building-in a legacy of underperformance and the SHMAA an exaggerated level of self-containment in the HMA. This raises a need for wide cooperation particularly with London.
- 1.9.3 The Local Plan must show a wide variety of deliverable and sustainable sites in order to turn these trends round. A 20% buffer in the first 5 years is appropriate and the assumption that all sites are deliverable (including Lodge Hill) shows a lack of a realistic and positive response to the critical issue at stake. In order to provide a sound plan the range of housing sites needs to be widened and geared to delivery.

Name: Martin Simpson

Reference 189

Organisation

Boxley Developments Limited

On Behalf Of

Type of Consultee

Business

Developing a Vision for Medway

Question 1

I would like to see Medway's character return and to surround the river again. The river around Chatham and Rochester has been stripped of all character now and has no interest, just large space of water. It will be made worse when concrete developments arrive to the waters edge. My vision is to see the community on the water in every way, in a controlled way, including housing, trading and general living. This may appear quirky or abstract, but all local sailors and passion for the sea, this is what makes us different.

Developing a Vision for Medway Comments

Strategic Issues Question 2

(Did not answer)

Question 3 (Did not answer)

Strategic Issues Comments (Did not answer)

Housing

Question 4

No I do not agree as a minority section of the housing group 'Bargees' did not even get a mention, even though you have 1000 bargees on the river (houseboats). You need to include these and foresee that no new moorings have become available over the past

Question 5

Extra 50 - 100 residential moorings per year up to 2035 V88=In Medway areas this should be raised to 40 - 50% short term to 2035 as catch up, and then reduce / review in 2035.

Question 6 (Did not answer)

Question 7

Co-housing is a new concept, and could be satellite to a larger link of mentoring the young people in some cases.

Question 8

a minority section of the housing group 'Bargees' did not even get a mention, even though you have 1000 bargees on the river (houseboats). You need to include these and foresee that no new moorings have become available over the past 20 years really, and the demand is huge. There needs to be 50 residential moorings made immediately and 50 per year up to 2035. Grant Snapps has recently urged you to grant planning permission for residential moorings and offered incentive schemes.

Question 9

Bringing the above development down to the water, also brings feelings of well being and should be the center of the community V4=My suggestions above subject to environmental impacts would serve well to the river reaches of Chatham, Rochester central. A small area would be Brambletree Wharf and moorings opposite Port Medway.

Question 10

(Did not answer)

Question 11

The demand is huge and one I have monitored for 16 years now. Marinas used to have waiting lists. After a few years they decided to abandon them as no boats were moving. Its gridlock, which is resulting in people coming back home to the area to find they have to abandon their boats.

Question 12

If the council showed support to developing the waterways, it would be a good start.

Question 13

Yes there is a small demand even out of areas. Not all students like Campus V17=Bargees are classified as Gypsy travellers, and the need is huge and despite. This needs urgent attention. They need river moorings, and high on the mud is better for residential and lower on the mud at low water is better for leisure. Surveys show mixed residential and leisure users work well and make the environment safer.

Question 14 (Did not answer)

Housing Comments (Did not answer)

Economy

Question 15 (Did not answer)

Question 16 (Did not answer)

Question 17 (Did not answer)

Question 18 (Did not answer)

Question 19 (Did not answer)

Question 20 (Did not answer)

Question 21 (Did not answer)

Economy Comments (Did not answer)

Tourism

Question 22 (Did not answer)

Question 23 (Did not answer)

Question 24 (Did not answer)

Tourism Comments (Did not answer)

Retail, Commercial, Leisure, Town Centre

Question 25 (Did not answer)

Question 26 (Did not answer)

Question 27 (Did not answer)

Question 28 (Did not answer)

Question 29 (Did not answer) Retail, Commercial, Leisure, Town Centre Comments (Did not answer)

Environment Question 30 (Did not answer)

Question 31 (Did not answer)

Question 32 (Did not answer)

Environment Comments (Did not answer)

Built Environment

Question 33 (Did not answer)

Question 34 (Did not answer)

Question 35 (Did not answer)

Question 36 (Did not answer)

Question 37 (Did not answer)

Built Environment Comments (Did not answer)

Rural Issues Question 38 (Did not answer)

Question 39 (Did not answer)

Question 40

(Did not answer)

Question 41 (Did not answer)

Question 42 (Did not answer)

Rural Issues Comments (Did not answer)

Infrastructure and Service Question 43 (Did not answer)

Question 44 (Did not answer)

Question 45 (Did not answer)

Question 46 (Did not answer)

Infrastructure Service Comments (Did not answer)

Social and Community Infrastructure

Question 47 (Did not answer)

Question 48 (Did not answer)

Social Community Infrastructure Comments (Did not answer)

Open Space Question 49 (Did not answer)

Question 50 (Did not answer) Question 51 (Did not answer)

Question 52 (Did not answer)

Question 53 (Did not answer)

Open Space Comments (Did not answer)

Sports Facilities Question 54 (Did not answer)

Question 55 (Did not answer)

Sports Facilities Comments (Did not answer)

Natural Resource Question 56 (Did not answer)

Natural Resource Comments (Did not answer)

Air Quality Question 57 (Did not answer)

Air Quality Comments (Did not answer)

Minerals Question 58 (Did not answer)

Question 59 (Did not answer)

Minerals Comments

(Did not answer)

Waste Question 60 (Did not answer)

Waste Comments (Did not answer)

Sustainability and Climate Change

Question 61 (Did not answer)

Question 62 (Did not answer)

Question 63 (Did not answer)

Question 64 (Did not answer)

Question 65 (Did not answer)

Sustainability and Climate Change Comments (Did not answer)

Flood Risk

Question 66 (Did not answer)

Question 67 (Did not answer)

Flood Risk Comments (Did not answer)

Energy Question 68 (Did not answer)

Question 69 (Did not answer)

Question 70 (Did not answer)

Energy Comments (Did not answer)

Transport

Question 71 (Did not answer)

Question 72 (Did not answer)

Question 73 (Did not answer)

Question 74 (Did not answer)

Question 75 (Did not answer)

Transport Comments (Did not answer)

Deliverability

Question 76 (Did not answer)

Question 77 (Did not answer)

Question 78 (Did not answer)

Question 79 (Did not answer)

Deliverability Comments (Did not answer)

Developments Strategy Question 80

(Did not answer)

Question 81 (Did not answer)

Question 82 (Did not answer)

Question 83 (Did not answer)

Question 84 (Did not answer)

Question 85 (Did not answer)

Question 86 (Did not answer)

Question 87 (Did not answer)

Development Strategy Comments (Did not answer)

Other Comments

(Did not answer)

Name: Martin Page

Reference 190

Organisation dha Planning

On Behalf Of

Type of Consultee

Developer/Consultant

Developing a Vision for Medway Question 1

(Did not answer)

Developing a Vision for Medway Comments

Strategic Issues Question 2

(Did not answer)

Question 3 (Did not answer)

Strategic Issues Comments (Did not answer)

Housing

Question 4

No - please see separate statement via post made on behalf of The John Hinge Will Trustees and Others (agent DHA Planning) Reference 184 As stated in SHMAA but influences outside need more recognition V88=Yes at 10No. threshold V89=All forms V63=No comme

Question 5 (Did not answer)

Question 6 (Did not answer)

Question 7 (Did not answer)

Question 8 (Did not answer)

Question 9 (Did not answer)

Question 10 (Did not answer)

Question 11

(Did not answer)

Question 12 (Did not answer)

Question 13 (Did not answer)

Question 14 (Did not answer)

Housing Comments (Did not answer)

Economy

Question 15 (Did not answer)

Question 16 (Did not answer)

Question 17 (Did not answer)

Question 18 (Did not answer)

Question 19 (Did not answer)

Question 20 (Did not answer)

Question 21 (Did not answer)

Economy Comments (Did not answer)

Tourism

Question 22 (Did not answer)

Question 23

(Did not answer)

Question 24 (Did not answer)

Tourism Comments (Did not answer)

Retail, Commercial, Leisure, Town Centre

Question 25 (Did not answer)

Question 26 (Did not answer)

Question 27 (Did not answer)

Question 28 (Did not answer)

Question 29 (Did not answer)

Retail, Commercial, Leisure, Town Centre Comments (Did not answer)

Environment

Question 30 (Did not answer)

Question 31 (Did not answer)

Question 32 (Did not answer)

Environment Comments (Did not answer)

Built Environment Question 33

(Did not answer)

Question 34 (Did not answer)

Question 35 (Did not answer)

Question 36 (Did not answer)

Question 37 (Did not answer)

Built Environment Comments (Did not answer)

Rural Issues Question 38 (Did not answer)

Question 39 (Did not answer)

Question 40 (Did not answer)

Question 41 (Did not answer)

Question 42 (Did not answer)

Rural Issues Comments (Did not answer)

Infrastructure and Service

Question 43 (Did not answer)

Question 44 (Did not answer)

Question 45 (Did not answer) Question 46 (Did not answer)

Infrastructure Service Comments (Did not answer)

Social and Community Infrastructure

Question 47 (Did not answer)

Question 48 (Did not answer)

Social Community Infrastructure Comments (Did not answer)

Open Space Question 49 (Did not answer)

Question 50 (Did not answer)

Question 51 (Did not answer)

Question 52 (Did not answer)

Question 53 (Did not answer)

Open Space Comments (Did not answer)

Sports Facilities Question 54 (Did not answer)

Question 55 (Did not answer)

Sports Facilities Comments (Did not answer)

Natural Resource

Question 56 (Did not answer)

Natural Resource Comments (Did not answer)

Air Quality

Question 57 (Did not answer)

Air Quality Comments (Did not answer)

Minerals

Question 58 (Did not answer)

Question 59 (Did not answer)

Minerals Comments (Did not answer)

Waste Question 60 (Did not answer)

Waste Comments (Did not answer)

Sustainability and Climate Change

Question 61 (Did not answer)

Question 62 (Did not answer)

Question 63 (Did not answer)

Question 64

(Did not answer)

Question 65 (Did not answer)

Sustainability and Climate Change Comments (Did not answer)

Flood Risk

Question 66 (Did not answer)

Question 67 (Did not answer)

Flood Risk Comments (Did not answer)

Energy

Question 68 (Did not answer)

Question 69 (Did not answer)

Question 70 (Did not answer)

Energy Comments (Did not answer)

Transport Question 71 (Did not answer)

Question 72 (Did not answer)

Question 73 (Did not answer)

Question 74 (Did not answer) Question 75 (Did not answer)

Transport Comments (Did not answer)

Deliverability

Question 76 (Did not answer)

Question 77 (Did not answer)

Question 78 (Did not answer)

Question 79 (Did not answer)

Deliverability Comments (Did not answer)

Developments Strategy Question 80

(Did not answer)

Question 81 (Did not answer)

Question 82 (Did not answer)

Question 83 (Did not answer)

Question 84 (Did not answer)

Question 85 (Did not answer)

Question 86 (Did not answer)

Question 87 (Did not answer)

Development Strategy Comments (Did not answer)

Other Comments

(Did not answer)

Name: Martin Taylor

Reference 191

Organisation Bilfinger GVA

On Behalf Of

Type of Consultee

Developer/Consultant


Our Ref: 02B536836

4 March 2016

Medway Council Planning Department Gun Wharf Dock Road Chatham Kent ME4 4TR



Dear Sir/Madam,

MEDWAY LOCAL PLAN – ISSUES AND OPTIONS CONSULTATION 2016 PROVISION OF AFFORDABLE LOW COST HOMES FOR THE ELDERLEY POTENTIAL SITE ALLOCATION FOR RESIDENTIAL MOBILE HOMES AT GOLF COURSE ADJOING KINGSMEAD PARK, ALLHALLOWS, ROCHESTER, ME3 9TD

We write on behalf of our client, the Turners Park Group, who own Kingsmead Park, a mobile home site for over 55s at Allhallows, and the adjoining golf course which they consider provides an opportunity to provide a dditional park homes for the elderly in a sustainable location. We therefore make this representation in response to your consultation on the Issues and Options for consideration in the new Local Plan and Strategic Housing Market Assessment.

Issues and Options Consultation Housing Chapter 7

Chapter 7 of the Issues and Options Document considers the Housing Needs for Medway and identifies a need for 29,463 new homes by 2035 (para. 7.8). It recognises that the cost of housing is unaffordable for many people and identifies the particular difficulty faced by younger people (para. 7.11).

However, affordability is also a difficulty for older people on low pension incomes who can no longer afford t he mortgage a nd/or upkeep their family homes but who are not e ligible for social or affordable rented housing. Many of these older people seek affordable low cost accommodation in residential mobile homes and in the process free up their former homes for new young families. These caravan based homes are now more commonly referred to as 'park homes'.

Often, older people may have a limiting long term physical disability or illness or simple from a factor of age find it difficult to cope with a full flight of stairs. They therefore seek single storey accommodation; however, they may not be able to afford a bungalow. Instead they may choose park homes, which are similar to bungalows, but more affordable due to mass production caravan construction methods. Their single storey nature, combined with mutually supportive communities, allow them to remain living independently for a much longer period of time.

The new Local Plan, will therefore need to provide for the expansion of existing park home estates or the provision of new park home estates as part of an overall strategy to address the needs of different groups in the community such as, older people including those with or anticipating limited mobility in accordance with the NPPF (para 50) and the NPPG.



Strategic Housing Market Assessment 2015

In this regard, the 2015 SHMA has correctly looked at the needs of older people predicting that the population aged over 65 plus will rise by 55% from 40,500 in 2013 to 67,800 in 2035, with a 52% increase in those living with a limiting long term illness.

The Assessment, notes that due to a lack of robust available data there are certain specific groups that have not been reviewed in the assessment, but that are important to identify as they may require consideration in relation to future specific housing requirements. The report states that these groups include mobile home park residents (Paragraph 8.3).

Although there may not be a robust methodology for identifying the future need for park homes, it is certain that with an increase in the proportion of older people in Medway, then an increasing proportion of the predicted number of new homes required by 2035 should be park homes and that the council should allocate sites for such in the new Local Plan.

As the SHMA acknowledges (para 8.13), existing park home sites are largely located in rural areas outside the settlement boundary. This approach should remain as should the existing policy H12 that seeks to protect them. If park home sites are allocated within the settlement boundary without the protection of policy H12 they are likely to come under pressure from mainstream house builder for redevelopment.

The SHMA acknowledges the three main home parks in cluding our client's park at Allhallows (8.12), and states that they provide a specific group of housing stock which can help to meet the need for lower cost housing (8.13). This is caveated by the fact that their rural location often means that they do not benefit from wider service provision; however, this is not the case with Kingsmead Park which lies a djacent to the village of Allhallows which is well s erved by two local s hops, a pub, doctor's surgery, community hall and recreational open space.

With regard to the housing needs of older people generally, paragraph 8.24 of the SHMA indicates how down-sizing from larger family homes should be encouraged as it can help older people to release capital (to enhance their pensions) as well as releasing much needed larger properties for other residents, and facilitating flexibility and churn in Medway's housing market. Park homes address this need.

Issues and Options Questions 7 and 13

Therefore, in answer to question 7 of the Issues and options we are of eth firm view that park homes should be included within the mix of h omes that b est me et the needs of Medway's g rowing population of older people.

As a form of 'custom built housing' we would answer question 13 that specific sites outside settlement boundaries but near to or at the edge of sustainable settlements should be allocated for park homes. They will not get built as part of mixed schemes within settlement boundaries. They will be 'lost' to mainstream housing if allocated outside settlement boundaries. They are unlikely to be permitted on sites outside settlement boundaries unless as part of a site specific allocation for park homes.

Potential Site Allocation for Park Homes

To address the need for park homes, we would like to put forward our client's site for consideration as a Site Allocation for the Local Plan.

As well as the Kingsmead Park itself, our client owns the Allhallows Golf Club on land to the west. Allhallows golf course is a small 27 par 9 hole golf course set in approximately 15 acres that is open for everyone to play. The course is operated by a tenant on behalf of Turners Parks Group, but struggles in providing neither a short pitch & putt facility for tourists nor a challenging enough course for regular golfers. This makes it difficult for the course to compete for custom with the nearby 18-hole course at Allhallows Leisure Park. As a result, the social side of the club seems to take precedence with the clubhouse being used by members as an alternative to the publeading to late evening noise and disruption to residents in the area.

Proposed Allocation



Figure 1: Site Ownership and Context of proposal area

Our client proposes to extend the park onto a part of the adjoining golf course as indicted in red in figure 1 above which should provide an opportunity to site between 60 and 70 park home caravans depending on layout and landscaping. The extension would be limited to the northern area of the golf course.

The external appearance and layout of the new park homes would be in keeping with the low impact of the existing single-storey park homes on site. Although the golf course is located outside the settlement boundary this would not be a proposal for built dwelling houses, but rather a proposal to site single storey residential mobile homes conforming to the definition of caravan with a minimal visual and environmental impact which this council, other councils, and various Inspectors have found to be acceptable in the countryside, where bricks and mortar dwellings may not.

The greater part of the golf course will be retained to the south with a revised shorter 9 hole pitch and putt course that will be designed to attract families and younger players.

Allhallows itself is a sustainable village community with two local shops, including a Londis near the site, the Pilot Public House, a primary school with its own playing field, a recreation ground with two further playing fields and a community hall, and a large holiday park providing a range of jobs for the local community.

In addition, the park itself is in a sustainable location with a bus stop right outside the entrance to the park making it easy for residents to get to nearby towns and villages. The train stations at S trood, Rochester and Chatham provide good transport links with London and other major UK destinations.

National Planning Policy

The N ational P lanning P olicy F ramework (NPPF) sets out the G overnment are planning policies for England and how these are expected to be applied. It states that the purpose of the planning system is to contribute to the achievement of sustainable development (Para. 6). In this regard three dimensions of s ustainable d evelopment are identified as e conomic, s ocial and e nvironmental (paragraph 7).

- Economic- the proposed use will provide an additional 60 70 park homes to the area whose spending at local shops and on local services will help boost the local economy by sustaining local jobs;
- Social the proposed use will address the need to provide low-cost affordable homes for older people looking for somewhere to retire with single floor living, low maintenance, a small garden, in a friendly mutually supportive community.
- Environment Landscaping can be provided that will enhance the screening and appearance of the site and its contribution to local wildlife will be improved. The site is located in a sustainable location close to local pubs and shops with bus services linking it to larger nearby settlements.

The proposal therefore represents sustainable development. **Paragraph 14** of the NPPF advises that 'at the heart of the National Policy Framework is a presumption in favour of sustainable development'. Therefore, there should be a presumption in favour of this proposed allocation

One of the c ore principles of sustainable d evelopment is d elivering a wide c hoice of h igh qu ality homes. To d eliver a wide c hoice of h igh qu ality homes, **paragraph 50** states that L ocal P lanning Authorities should: Plan for a m ix of housing based current and future d emographic trends, market trends and the needs of different groups in the community (such as, but not limited to families with children, older people with disabilities...).

In providing residential mobile homes (also known as park homes), the proposed park extension will provide single storey housing that is generally popular with the elderly, less able and those on low incomes. The proposal therefore directly addresses the requirement for a mix of housing to address the needs of different groups as required in paragraph 50 of the NPPF, and addresses the need to provide housing for older people such as bungalows as advised by the NPPG.

The proposal does not harm the character of the countryside as caravans are generally considered appropriate within the countryside and as the site is well screened. The proposed development will not be visible to any public views from outside of the park so it will not adversely affect residential amenity, or the character and appearance of the countryside.

Current Local Planning Policy

The current local planning policy is the Medway Local Plan 2003. The Council is starting work on the new Local Plan which will replace the 2003 Medway Local Plan. The current Proposals Map (figure 3 below) identifies the home park, as being within H12 (Mobile Home Park) and C13 (Tidal Flood Area). The area to the east is covered by Policy BNE34 (Area of Landscape Importance). The golf course itself is designated as L6 (Allocated Open Space) in addition to the BN34 designation.



Figure 3: Extract from Proposals Map

The Proposals Map also indicates that a small part of the golf course, and the whole of the residential park may be at risk of flooding, however, this line is much further advanced than the official flood risk line on the Environment Agency Flood Map which does not in clude the golf course or the existing residential park as being at risk of flooding (see figure 4 below). In any event, the area at risk of flooding is protected by effective sea defences.



Figure 3; EA Flood Risk Map

Paragraph 5.5.36 of the Local Plan states:

The Kingsmead Mobile Home Park, situated to the south of Avery Way, Allhallows, is a permanent residential mobile home park with the benefit of full planning permission. The site has low cost housing since 1961 and is quite different in character from the permanent housing in Allhallows itself.

By this paragraph, the council accept the role of the home park estate in providing low cost homes and by reference to the different character of the homes they are accepting that such homes are acceptable within a countryside setting outside the designated settlement boundary.

Policy H12 (Mobile Home Park) goes on to designate Kingsmead Park as a unique area for low cost housing outside, but adjacent to, the settlement boundary of Allhallows on Sea. The policy states:

Within H oo M arina a nd t he K ingsmead M obile H ome P ark, a s d efined on t he P roposals Map, development which would lead to the permanent loss of the mobile homes, or a reduction in the area available for their use, will not be permitted unless it is development ancillary to these parks.

This policy seeks to retain Kingsmead Park and resist any loss in the number of mobile homes.

Policy BNE25: Development in The Countryside states

Development in the countryside will only be permitted if:

- i. It maintains, and wherever possible enhances, the character, amenity and functioning of the countryside, in cluding 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 lo cation (such as agriculture, forestry, outdoor or informal recreation).

The countryside is defined as that land outside the urban and rural settlement boundaries defined on the Proposals Map.

There is a s trong case that park homes demand a countryside location. The existing home park is designated as being located outside the settlement. If it were located within the settlement boundary there is a strong likelihood that it would come under pressure to be redeveloped for mainstream bricks and mortar housing, leading to the loss of this important type of low cost housing. However, before we submit a planning application we feel that it would be beneficial and clearer if the site were allocated for park homes under the existing or successor H12 policy.

Policy BNE34: (Area of Local Landscape Importance) applies to the golf course.

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

- a) It does not materially harm the landscape character and function of the area, or
- b) The e conomic and social be nefits are so important that they outweigh the local priority to conserve the area's landscape.

Development within a n A rea o f L ocal Landscape importance s hould be s ited, d esigned a nd landscaped to minimise harm to the area's landscape character and function.

As the existing home park lies within the designated Area of Local Landscape Importance it must have been considered to be a type of low impact use that minimises harm to the areas landscape character and function. Indeed paragraph 5.5.36 (above) describes the home park as having a quite different character to that of the adjoining settlement. Therefore, the proposed extension of the park should be considered acceptable. Moreover, the area we have identified is well contained by the existing settlement of Allhallows, the existing home park, and the existing recreation ground (which is on higher ground) and therefore, its use for park homes will not materially harm the character and function of the area. Finally, its use for park homes will create more spending at local shops and pubs in the village, assisting their viability and retention. It will also provide more low-cost homes for older people. Therefore the economic and social benefits arising from the proposal would outweigh the original intent to conserve the landscape in this location if it were necessary to do so.

Policy L6 states t hat t he la nd be tween the former j unior s chool a nd K ingsmead P ark w ill be safeguarded for the provision of informal open space. This policy intention need not be breached as that m ain parcel of land be tween the former s chool a nd K ingsmead Park w ould be r etained a s informal open (and recreational) space in the form of a pitch and putt facility. Meanwhile, policy L3 allows for the loss of open space if sports and recreational facilities can be retained and enhanced through redevelopment of a small part of the site.

Although a small a rea of the g olf c ourse w ould be lost as open space, the m ajority of the a rea designated would remain is this use. At present the 9 hold golf course find it difficult to attract custom, as the 9 holes are not challenging enough for regular golfers who would prefer an 18-hole golf course including some long par 5 holes (the current course only provides a 3 and 4 par holes). On the other hand, the inclusion of par 4 holes at the current course makes it a bit too challenging for families simply seeking a bit of ' fun'. This means that the club h as h ad t os upplement its g olf in come a nd h as become as m uch a d rinking club as a g olf club and t his cau ses a nuisance for lo cal r esidents, particularly in summer. Therefore, it is proposed to shorten the course to create a proper par-3 course that will be more attractive to families and compliment rather than compete with the 18-hole course at Allhallows Leisure Park.

Conclusion

The Issues and Options Consultation identifies a need for 29,463 new homes by 2035 and recognises that the cost of housing is unaffordable to many people. This applies to older people as well as younger people, and park homes provide older people with an opportunity to down size into more affordable low cost single storey accommodation to free up capital for their pensions and in turn free up family housing for younger people.

Therefore, the new Local Plan should be seeking allocate land for park homes to address this need, and that should be in the form of site specific allocations outside settlement boundaries (to protect them from high value forms of residential development) in locations near or adjacent to sustainable settlements.

The golf course adjacent to Kingsmead Park provides such an opportunity for 60-70 park homes for the over 55s, while allowing for the existing 9 hole golf course to be shortened to provide a 9 hole pitch and putt facility that better addresses the family leisure and tourism market in this resort location.

We would therefore be grateful if you would consider this site for allocation as a (current) policy H12 (or its successor) allocation in the new Local Plan.

Please could you acknowledge this representation and please feel free to contact me to discuss the proposal in more detail.

I look forward to hearing from you.

With Kind regards,



Martin Taylor MRTPI Director For and on behalf of GVA Grimley Limited

Name: Vivien Deakin

Reference 192

Organisation

On Behalf Of

Type of Consultee Member of the public

maryott, kyle

From:	Vivien
Sent:	18 March 2016 13:34
To:	policy, planning
Subject:	Planning proposal Cliffe Woods
Follow Up Flag:	Follow up
Flag Status:	Flagged

I would like to object most strongly to the propose building of housing on farmland in Cliffe Woods. As a resident of Ladyclose Avenue the impact on our life would be immense. The peace and quiet of our home would be compromised and the view across open fields destroyed. The very things which made our choice of living here.

The impact on the surrounding area will of course prove a problem. The B2000 already under huge strain will become impossible.

Cliffe Woods is a village in semi rural setting. We do not want it destroyed.

Vivien Deakin. Larkspurs. Ladyclose Avenue. Cliffe Woods. ME3 8JL Sent from my iPad wireless

Name: Linda Christine Sweet

Reference 193

Organisation

On Behalf Of

Type of Consultee Member of the public

Developing a Vision for Medway

Question 1

To appreciate the residents of Halling village rather than for profit on every square inch of available green space To appreciate all green spaces and not to be used for profit but to allow for residents to have access to walks and peace and quiet rather that the noise of persistent traffic noise. We in Kent Road, Halling will experience more and more road noise due to the destruction of the conservation area between Kent Road and the A228 by pass. As this is due to Redrow and the St Andrews development site residents in Kent Road should be compensated with triple glazing to their homes at the total cost of Redrow Developments for their quality of life and also for the fact that because of the development works the Residents of Halling have been subject to the village being made a 'rat run' by drivers attempting to avoid the queues on the A228 when works are being undertaken. This has the effect of residents not being able to open their windows due to the fact that vehicle fumes penetrate their homes and becoming a health hazard.

Developing a Vision for Medway Comments

Strategic Issues Question 2 (Did not answer)

Question 3 (Did not answer)

Strategic Issues Comments (Did not answer)

Housing Question 4 (Did not answer)

Question 5 (Did not answer)

Question 6 (Did not answer)

Question 7 (Did not answer)

Question 8 (Did not answer) Question 9 (Did not answer)

Question 10 (Did not answer)

Question 11 (Did not answer)

Question 12 (Did not answer)

Question 13 (Did not answer)

Question 14 (Did not answer)

Housing Comments (Did not answer)

Economy

Question 15 (Did not answer)

Question 16 (Did not answer)

Question 17 (Did not answer)

Question 18 (Did not answer)

Question 19 (Did not answer)

Question 20 (Did not answer)

Question 21 (Did not answer)

Economy Comments

(Did not answer)

Tourism Question 22 (Did not answer)

Question 23 (Did not answer)

Question 24 (Did not answer)

Tourism Comments (Did not answer)

Retail, Commercial, Leisure, Town Centre

Question 25 (Did not answer)

Question 26 (Did not answer)

Question 27 (Did not answer)

Question 28 (Did not answer)

Question 29 (Did not answer)

Retail, Commercial, Leisure, Town Centre Comments (Did not answer)

Environment Question 30

(Did not answer)

Question 31

The wildlife has already been disturbed by the building of St Andrews Park and the demolishing of the conservation area separating Halling village from the A228 and this is only going to be compromised by the a new foot bridge, which is totally unnecessary, from the bottom of Kent Road over the A228 to connect to St Andrews Park V115=Keep this part of Kent person friendly instead of complete profit otherwise Kent will end up a

grey space with white lines down the middle. Think of our young people growing up in a healthy atmosphere instead of a concrete jungle!!

Question 32 (Did not answer)

Environment Comments (Did not answer)

Built Environment

Question 33

I do not believe that Medway care about any heritage assets other than sheer profit.

Question 34

Stop taking all the assets that make us a village in to something that is governed by large developers who do not give a damn about existing residents and whether the area can absorb an expansion of human habitation or traffic volumes.

Question 35

I do not think Medway give any care for residents, wild life or any well being apart from profit.

Question 36

Stop developing east Kent for profit. Leave Kent as it should be a beautiful green part of England not a concrete jungle for the use of cars and huge lorries.

Question 37

Leave everything alone as far as is possible. Although it is appreciated that development has to move forward to a degree Kent is vulnerable to large developers 'cashing in' due to where Kent is located.

Built Environment Comments

(Did not answer)

Rural Issues Question 38 (Did not answer)

Question 39 (Did not answer)

Question 40 (Did not answer)

Question 41

(Did not answer)

Question 42

Medway does not care about any 'Neighbourhood Plan' Medway does not care about the Environment only profit

Rural Issues Comments (Did not answer)

Infrastructure and Service

Question 43 (Did not answer)

Question 44 (Did not answer)

Question 45 (Did not answer)

Question 46 (Did not answer)

Infrastructure Service Comments (Did not answer)

Social and Community Infrastructure

Question 47 (Did not answer)

Question 48 (Did not answer)

Social Community Infrastructure Comments (Did not answer)

Open Space Question 49 (Did not answer)

Question 50 (Did not answer)

Question 51 (Did not answer) Question 52 (Did not answer)

Question 53 (Did not answer)

Open Space Comments (Did not answer)

Sports Facilities Question 54 (Did not answer)

Question 55 (Did not answer)

Sports Facilities Comments (Did not answer)

Natural Resource Question 56 (Did not answer)

Natural Resource Comments (Did not answer)

Air Quality Question 57 (Did not answer)

Air Quality Comments (Did not answer)

Minerals Question 58 (Did not answer)

Question 59 (Did not answer)

Minerals Comments (Did not answer) Waste Question 60 (Did not answer)

Waste Comments (Did not answer)

Sustainability and Climate Change Question 61 (Did not answer)

Question 62 (Did not answer)

Question 63 (Did not answer)

Question 64 (Did not answer)

Question 65 (Did not answer)

Sustainability and Climate Change Comments (Did not answer)

Flood Risk Question 66 (Did not answer)

Question 67 (Did not answer)

Flood Risk Comments (Did not answer)

Energy Question 68 (Did not answer)

Question 69 (Did not answer)

Question 70

(Did not answer)

Energy Comments (Did not answer)

Transport Question 71 (Did not answer)

Question 72 (Did not answer)

Question 73 (Did not answer)

Question 74 (Did not answer)

Question 75 (Did not answer)

Transport Comments (Did not answer)

Deliverability

Question 76 (Did not answer)

Question 77 (Did not answer)

Question 78 (Did not answer)

Question 79 (Did not answer)

Deliverability Comments (Did not answer)

Developments Strategy Question 80 (Did not answer)

Question 81 (Did not answer)

Question 82 (Did not answer)

Question 83 (Did not answer)

Question 84 (Did not answer)

Question 85 (Did not answer)

Question 86 (Did not answer)

Question 87 (Did not answer)

Development Strategy Comments (Did not answer)

Other Comments (Did not answer)