



Consultation response

for

Medway Local Plan 2012 – 2035 – Development Options Consultation

in connection with

Land at Grain Road (site 0794)

Middle Stoke

April 2017

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77 Commercial Road | Paddock Wood | Kent TN12 6DS

IN ASSOCIATION WITH

**Lambert
& Foster**



1. Introduction

- 1.1. We are writing on behalf of our client Mr Castle and following the representations made in respect of the Medway Strategic Land Availability Assessment 2017 (SLAA) submission under site reference 0794 and to comment upon the current Local Plan consultation.
- 1.2. This statement will provide a summary on the four Development Options currently proposed by Medway Council. Each of the four options support the growth of an area within which our clients site is located and therefore the potential for development of the site should be considered acceptable in principle.
- 1.3. Medway Council is producing a new Local Plan, to replace its current saved Policies in the 2003 Local Plan and the Kent Waste and Minerals Local Plans. The new Local Plan will have a time horizon up to 2035. The role of the Medway Local Plan is to plan positively for the development and infrastructure that the area needs, whilst protecting and enhancing the natural, built and historic environment.
- 1.4. Following the 'Issues and Options' consultation in 2016, the Planning Service has prepared a 'Development Options' document as the basis for a further stage of consultation.
- 1.5. Having reviewed the document we wish to respond to the following:-
 - Vision and Strategic Objectives
 - Delivering Sustainable Development
 - The four scenarios and options
 - Housing Policy Approaches
- 1.6. Set out below is a representation response to each in turn.

2. Development Options Consultation

- 2.1. The executive summary highlights that *'Alternative approaches could involve development on green field sites in suburban and rural areas, redevelopment of employment sites for mixed use schemes, building at higher densities.'* These approaches are discussed in more detail within the Development options consultation.
- 2.2. At Paragraph 1.14 it is confirmed that the consultation *'provides an assessment of the current context for Medway's economic, social and environmental conditions and the key issues that need to be addressed in planning positively for the areas future over the lifetime of Local Plan.'* (Our emphasis) Paragraph 1.15 goes on to consider *'The document provides a draft vision for Medway in 2035 and the strategic objectives that should underpin the approaches taken to the areas balanced growth'*

Comment – In broad terms our client supports the scope and vision for required growth and development outlined within the Local Plan consultation.

Vision and Strategic objectives

- 2.3. The consultation document sets out a draft vision for the new Local Plan: By 2035 Medway will be a leading waterfront University city of 330,000 people, noted for its revitalised urban centres, and its stunning natural and historic assets, and countryside.
- 2.4. Government policy requires Local Plans to plan positively to meet the development and infrastructure needs of the area. The Council, jointly with Gravesham Borough Council, commissioned a Strategic Housing and Economic Needs Assessment. This identified a need over the plan period for:
- 29,463 homes;
 - 49,943m² of B1 office space, 155,748m² of B2 industrial land, and 164,263m² of B8 warehousing land; and
 - 34,900m² of comparison retail space and 10,500m² of convenience (groceries etc.) retail space up to 2031.
- 2.5. The role of the Medway Local Plan is to plan positively for the development and infrastructure that the area needs, whilst protecting and enhancing the natural, built and historic environment.

2.6. The Strategic objectives for the plan are:-

2.7. A place that works well:

- To boost the performance of the local economy through supporting local businesses to grow and attracting inward investment through the provision of good quality employment land that meets the needs of businesses, and to secure and extend higher value employment opportunities;
- To significantly improve the skills of the local workforce:
- To establish Medway's recognition as a University city to realise economic and place making opportunities associated with the learning cluster of higher and further education providers in Medway;
- To deliver the infrastructure needed for business growth, to provide accessible employment locations, and excellent high speed broadband services; and
- To strengthen the transport network providing safe and effective choices for travel, including management of the highways network, enhanced public transport systems, and improved opportunities for walking and cycling.

2.8. A riverside city connected to its natural surroundings:

- To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development.
- To address the challenges of climate change, seeking opportunities to promote carbon reduction and mitigation measures, and reduce the risk of flooding; and
- To ensure the effective management of natural resources, including the sustainable supply of minerals and appropriate management of waste.

2.9. Medway recognised for its quality of life:

- To reduce inequalities in health through promoting opportunities for increasing physical activity, through walking, cycling, parks and other recreation facilities, and improving access to healthy food choices; and reduce social isolation in supporting retention and development of local services and dementia friendly environments;
- To provide for the housing needs of Medway's communities, that meets the range of mix, type and affordability the area needs; and
- To strengthen the role of Medway's town, neighbourhood and village centres, securing a range of accessible services and facilities for local communities, and opportunities for homes and jobs.

2.10. Ambitious in attracting investment and successful in place making:

- To deliver sustainable development, meeting the needs of Medway's communities, respecting the natural and historic environment, and directing growth to the most suitable locations that can enhance Medway's economic, social and environmental characteristics;
- To secure the ongoing benefits of Medway's regeneration, making the best use of brownfield land, and bringing forward the transformation of the waterfront and town centre sites for quality mixed use development, a focus for cultural activities;
- To establish quality design in all new development, respecting the character of the local environment and seeking opportunities to boost quality and improve the accessibility and design of the public realm; and
- To ensure that development is supported by the timely provision of good quality effective infrastructure, so that the needs of Medway's growing and changing communities are well served.

3. Delivering Sustainable Development

- 3.1. The consultation seeks to provide comprehensive options for how Medway could accommodate this growth within the Local Plan.

Options for Sustainable Development

- 3.2. **Comment - Sustainability is at the heart of the National Planning Policy Framework (NPPF) and all planning policy has to contribute to the achievement of sustainable development by securing economic, social and environmental benefits to Medway. Because these benefits are mutually dependant, they should not be considered in isolation.**
- 3.3. We agree with paragraph 3.9 that *'It is unlikely that the full range of development needs could be met solely in the identified regeneration areas on brownfield land'*

Comment - It is acknowledged that redevelopment of brownfield land (or previously developed land) will make a valuable contribution towards meeting Medway's development requirements and so the Council's options of allowing the redevelopment of brownfield land and sites with infrastructure on subject to certain criteria are supported. Equally, as it is recognised that the needs of Medway cannot be met through brownfield land alone development on green fields land will be necessary.

- 3.4. The council's approach seeks to *'make use of greenfield land that is free from environmental constraints, of lesser value for landscape and agricultural purposes, and well related to services and infrastructure'*.

Comment - The promotion of additional sites and growth areas throughout Medway is welcomed by our client and whilst priority remains the reuse of previously developed land, there may be overriding constraints to development or un-implementable consents, which requires new allocations to be made, some of which may be outside of existing settlement boundaries and on greenfield sites.

- 3.5. We take note of the scenarios for development options within Medway and take each option in turn.

Scenario 1 (Appendix 1B) – Maximising the Potential of Urban Regeneration

- 3.6. This approach seeks to provide significant housing and employment development near to the existing urban centres and seeks to use land more intensively, re-address densities on existing allocated sites and land and identify new ones.
- 3.7. Under paragraph 3.25 this option also considers that *‘there would still need to be consideration of suburban and rural areas as potential locations for new development, in order to meet a balanced development strategy’*.

Comment – This identification of a need for housing and other development within rural areas is supported. Restricting or constraining development has significant implications on the vitality, social and economic well-being of communities and in the current circumstances where housing numbers are required to increase annually, it is necessary for all settlements to contribute to the delivery of dwellings, offering choice and variation to the market to provide the balanced growth required within the plan.

- 3.8. This option highlights suburban and rural growth *‘including options for locations on the Hoo Peninsula would provide for the balance of development needs, up to 7000 homes, supported by transport investment, services and open spaces, employment and retail land.’*
- 3.9. **Comment – Our client supports the consideration of locations on the Hoo Peninsula for provision of balanced development needs. The identification of 7,000 additional dwellings on the Hoo Peninsula is in principle supported by our client or at least a scale of housing growth that will provide for a critical mass of development that will assist in delivering necessary infrastructure and contributing to existing villages in social and economic terms. But, consideration to exact locations will need to be finely considered going forward.**
- 3.10. The map at Appendix 1B highlights areas of incremental expansion proposed. Of particular relevance are the area identified around Middle Stoke.

Comment – Our client agrees and considers the identified areas of incremental development around Middle Stoke should be wholly supported. The sensible in-filling in villages washed over by the incremental expansion designation should be allowed and is in fact vital for small villages.

- 3.11. The map also highlights areas for improved green infrastructure schemes.

Comment - The principle for the provision of Green Infrastructure is accepted by our client as retention and enhancement of multifunctional green networks should be considered, especially where sites, such as that within our clients control can have the ability to provide this with increased levels of housing and/or employment land. The provision of such space must be considered in the overall context of the site.

Scenario 2 (Appendix 1C) – Suburban expansion

- 3.12. This scenario provides greater consideration of the potential of the suburban areas to meet the shortfall between development needs and the pipeline of sites.

Comment – Our client considers that limiting development to those villages/suburban areas that already have facilities does not aid those existing settlements which lack essential facilities. Modest development which includes the provision of key services could help rejuvenate village and rural life. Whilst increasing levels of population in villages / suburban areas can support existing services and infrastructure better.

- 3.13. *'It is recognised that the suburban areas would be placed under significant pressure to meet Medway's development needs, and some growth would also need to be considered in rural areas, particularly on the Hoo Peninsula.'*(Our emphasis)

Comment – Our client supports the consideration of locations on the Hoo Peninsula for provision of balanced development needs.

- 3.14. Development could be located in areas that are already attractive to residents, and on green field sites that may be quicker to develop than large brownfield sites.

Comment – Our client supports the inclusion of green field sites throughout Medway to assist in delivering housing / employment land where necessary mitigation to perceived harm can be successfully managed. Realistically, development to support villages will need to consider development on green field land.

- 3.15. The map at Appendix C shows that around the Middle Stoke area incremental expansion is proposed.

Comment – This is fully supported by our client who owns land within Middle Stoke; and which already has buildings on.

- 3.16. The map also highlights that areas around Middle Stoke are identified as requiring improved green infrastructure schemes.

Comment - The provision of Green Infrastructure which promotes and support improvements to the transport network that increase safety, improve air quality, encourage use of sustainable modes of transport and/or make out towns and villages more attractive is supported in principle by our client. As is the delivery of development able to incorporate this.

Scenario 3 (Appendix 1D) – Rural Focus/Hoo Peninsula focus

- 3.17. In this scenario, the regeneration of urban and waterfront sites is again promoted, but consideration is given to the potential of the rural area in contributing to the development strategy and meeting development needs. *‘In this scenario, the Hoo Peninsula is considered as a potential location for growth.’* The scenario highlights that further development on the Hoo Peninsula could deliver: 2600 homes, primary schools, parks, health and community facilities through *‘the expansion of a number of villages that are considered to have a range of services and facilities that could support an increased population.’*

Comment – Our client agrees that this approach would seek to identify sites within the Hoo Peninsula.

- 3.18. This scenario would seek to provide *‘enhanced services and infrastructure to meet the needs of a growing population’*.

Comment – Our client agrees and supports this element of the approach.

- 3.19. The map attached at Appendix 1D identifies a number of existing villages to be expanded.

Comment – The villages identified for expansion, particularly with reference to the land identified around Middle Stoke, are wholly supported by our client.

Scenario 4 (Appendix 1E) – Urban Regeneration and a Rural Town.

- 3.20. This scenario brings together elements of the previous three approaches. Of particular note is that *‘aspects of the rural focus scenario are supported, for their potential to deliver planned development that could enhance the provision of services and jobs on the Hoo Peninsula,.’*

Comment – Our client supports the consideration of locations on the Hoo Peninsula for provision of balanced development needs.

- 3.21. Paragraph 3.42 highlights that *‘The Green Belt land to the west of Strood is not released, with preference given to using land in other locations.’*

Comment – Our client supports this, with his site being one such example of land not in the Green Belt.

- 3.22. At paragraph 3.43 the report highlights that *‘there are opportunities to enhance the setting of Hoo with planned green infrastructure and increased public open space, together with improved services and a mix of high quality housing to address the growing needs of residents and improve their health and wellbeing.’*

Comment – This is a theme running through all of the attached plans within the Hoo Peninsula and as with the previous scenarios our client supports the incremental expansion of rural villages particularly Middle Stoke and its immediately surrounding area.

- 3.23. To summarise the council has identified potential options for development locations to meet the housing needs identified for Medway over the plan period. Of particular relevance to our client’s site is the area around middle Stoke which is identified as being in need of rural expansion in all 4 scenario’s.

4. Housing

4.1. Policy Approach – Housing Delivery

4.2. The Strategic Housing and Economic Needs Assessment concluded that Medway needs to provide for 29,463 new homes over the plan period.

4.3. *‘The Strategic Housing Market Assessment also considered the range, type and mix housing needed in Medway. This included the need for ‘affordable housing’, the size and mix of homes, and those with particular needs, such as older people, people with disabilities, younger person households, minority ethnic groups, and rural households.’*

4.4. The assessment also identifies a high level of demand for affordable housing at 17,112 over the plan period.

Comment - The approach taken by the Council in identifying the full objectively assessed housing need is recognised and supported by our client. This approach appears to be broadly in accordance with guidance set out within the NPPF and PPG, however it is not clear whether this report makes allowance for the unmet need from London or surrounding Councils.

4.5. Policy Approach - Housing Mix

4.6. *‘The National Planning Policy Framework requires local planning authorities to make provision for a wide choice of high quality homes in mixed, sustainable communities. A key element of this is matching supply of accommodation to need, striking the right balance for a changing population with changing needs over time. Medway’s communities require a variety of housing, including in terms of tenure, to provide appropriate housing options for different households including families with children, couples, single person households and older people.’*

4.7. *‘Findings of the Housing Need Survey under the Strategic Housing Needs Assessment 2015 revealed that:*

- *Respondents’ properties being too small was the most common reason for those describing their accommodation as not meeting their needs.*
- *Two thirds of those who wanted to move stated that a two bedroom property was their preferred choice*
- *Over half of emerging households stated that a two bed property would suit their needs.’*

- 4.8. The Council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of the wide ranging needs of a growing and changing population.

Comment - In order to deliver new housing of an appropriate tenure it is recognised that new affordable housing would need to be delivered as part of most new development as outlined in the Strategic Housing Needs Assessment 2015. Whilst this approach is admirable, affordable housing should be provided only where it is viable to do so, whilst a lack of affordable provision should not prevent development being considered acceptable where it may contribute to delivering housing / employment land. We also note that two bed properties were the preferred choice for those residents surveyed. Shrinking household sizes mean it is important we create new housing in villages to maintain populations and land in our client's ownership can help deliver this

- 4.9. Policy Approach – Affordable Housing and Starter Homes

- 4.10. As noted above, the Strategic Housing and Economic Needs Assessment identified a need for 17,112 affordable dwellings over the plan period. The Plan identifies that a percentage of 25% affordable housing could be achieved on developments over 15 units alongside Starter Homes. *‘Some areas could support a higher proportion of affordable housing. Further work is required to test the viability of the Local Plan and policies, informed by upcoming advice on Starter Homes, and an understanding of the locations, scale and mix of development that will be identified as housing allocations in the new plan.’*

Comment – Our client welcomes the Council's acknowledgement that there is a requirement for a variety of housing types which, can in certain circumstances, include affordable housing provision. As is the impending introduction of starter homes meaning that the form of affordable housing is likely to change prior to adoption of the Local Plan. At the very least this position needs to be recognised within the emerging policy and having regard to that set out above.

- 4.11. Overall our client welcomes the Council's approach towards housing provision throughout Medway, especially in rural areas.

5. Employment

5.1. The consultation confirms that a core ambition of the Local Plan is to strengthen the performance of Medway's economy, securing quality jobs in the local area, capitalising on the further and higher education offer, and realising the area's potential as the largest city in Kent, enjoying a strategic location in the Thames Gateway. The Council supports opportunities to strengthen the local economy through encouraging development of businesses in successful growth sectors, and diversifying the employment base.

5.2. Policy Approach – Economic Development

5.3. The Council seeks to boost Medway's economic performance through making provision of employment land as identified in the Employment Land Needs assessment 2015.

5.4. The Council will support actions to:

- *Consolidate economic benefits from the regeneration programme in Medway, specifically seeking to strengthen the role of the town centres in providing wider job opportunities;*
- *Raise skills levels and provide apprenticeship and local labour opportunities;*
- *Realise opportunities for raising higher value employment through supporting the development of the Universities at Medway and the wider learning quarter, and linking to growth in the wider economy;*
- *Seek to accrue benefits for Medway's economy from strategic developments of infrastructure, housing and employment sites outside of the borough;*
- *Explore the extension of the successful Medway Innovation Centre model to provide additional serviced employment space for businesses;*
- *Seek the installation and upgrade of high speed broadband services in employment sites;*
- *Promote the diversification of Medway's economic base;*
- *Secure sustainable employment uses for the strategic sites at Grain and Kingsnorth, achieving value from the specific location offer and the access to water and rail for freight movements.*

Comment – Our client agrees with the Council’s aim to boost Medway’s economic performance and support the actions to ensure adequate employment provision. However, this comes from the ability to provide a range of well-designed, quality housing to support the intended workforce provision. Within the Hoo Peninsula and more specifically around Middle Stoke it is important the level of proposed employment growth is proportional to the anticipated residential development across this area to maintain the vitality of the area. We consider the proposed expansion of Middle Stoke to be a sustainable location for employment growth. The area is a successful employment location for a range of businesses and has scope for expansion in a sustainable and sensitive manner.

5.5. Policy Approach – Rural Economy

- 5.6. The policy preamble points out that *‘Medway’s rural area offers opportunities to develop further employment based in the tourism and leisure sectors, responding to the special characteristics of the countryside. Medway’s villages provide a range of services and facilities for residents, such as shops and pubs. These small businesses are critical to the sustainability of rural community life.’*
- 5.7. The policy points out that the *‘council will support the growth of rural businesses in well-designed development in appropriate locations that respect the character of the countryside. Sustainable rural tourism and leisure activities that are in keeping with their rural setting will be supported. The council will seek the retention of key rural services and facilities to promote sustainable villages, providing for the needs of rural residents’.*

Comment – Our client agrees that there should be more emphasis on the provision of jobs in rural areas. There should be more support for small businesses and start-up businesses in order to provide more opportunities for employment in villages.

Our client’s site in Middle Stoke could also offer the provision of residential units to support economic growth or perhaps an economic use within the village. We believe these sites can be provided in a sensitive manner and will provide a considerable benefit to the sustainability of the settlement and housing supply for Medway.

6. Summary

- 6.1. It is clearly apparent from each of the four scenarios presently forming part of the consultation that they are all supportive of growth within Middle Stoke, a location in which our client's site is located. Therefore, by default we can conclude that the Council recognises growth within this area is required and allocation should therefore be made accordingly.
- 6.2. Given that our client's site (0794) is available and deliverable it is well placed for allocation.
- 6.3. The above concludes my client's submissions in respect of this stage of the Local Plan Process. I trust that the above points will be taken into consideration, and would be grateful receive acknowledgement of same.
- 6.4. We look forward to receiving further updates as the Plan progresses.

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28/02/17	TWO	XX/XX/XX	INITIALS	XX/XX/XX
24/03/17	TWO			



Consultation response

for

Medway Local Plan 2012 – 2035 – Development Options Consultation

On behalf of

AC Goatham and Son

April 2017

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77 Commercial Road | Paddock Wood | Kent TN12 6DS

IN ASSOCIATION WITH

**Lambert
& Foster**



1. Introduction

- 1.1. We are writing on behalf of our client, AC Goatham and Son of Flanders Farm, Ratcliffe Highway, Hoo St Werburgh, Kent, ME3 8QE in respect of the Medway Council's Local Plan – Development Options Regulation 18 Consultation Report.
- 1.2. Our client owns land across Medway Council and also has interests in a number of sites which they have long term leases on. Within Medway the business farms over 500 acres of land for top fruit (apples and pears). In the last 10 years the business has invested over £20 million in built infrastructure in Medway to support its farming business.
- 1.3. The role of the Medway Local Plan is to plan positively for the development and infrastructure that the area needs, whilst balancing this within the context of protecting and enhancing the natural, built and historic environment.
- 1.4. The countryside is a landscape managed by those who have farmed it for generations and make it what it is today. This must be a consideration in the forthcoming Local Plan and changes in agricultural operations, scalability and the opportunity for investment and diversification to support agriculture should therefore be supported. It is imperative that when determining suitable development, regard should be had to the wider benefits offered as a result of any proposal, even when these may not directly relate to the site in question but other wider land holdings within the area.
- 1.5. Our client recognises that larger scale development (for residential and employment purposes) should, in the main, be prioritised in areas not within the Green Belt or within Areas of Outstanding Natural Beauty, although due regard must of course be had to where this is development that supports the preservation of such a landscape through land management – again, immediately at the site or in the wider domain.

- 1.6. It would appear from the Strategic Land Availability Assessment (SLAA) 2017 document that a limited number of sites have been identified as suitable and available for development. Whilst it could be seen as commendable that the Council only sees a small number as suitable, it is considered that one needs to be realistic about the requirement to deliver a significant amount of employment land and housing over the plan period. Consideration should therefore be given to where there may be the opportunity for the Council to work with various landowners / promoters to identify suitable areas for development.
- 1.7. Our client supports the Council's consideration at the executive summary of the report that *"Alternative approaches could involve development on green field sites in suburban and rural areas, redevelopment of employment sites for mixed use schemes, and building at higher densities"*.
- 1.8. Our client supports the point at paragraph 1.3 of the Development Options Report (DOR) introduction that the planning system performs the key role of contributing to building a strong, responsive and competitive economy whilst also providing housing to meet the needs of current and future occupiers.
- 1.9. AC Goatham and Son endorses the view that LPA's *"should **positively seek opportunities** [our emphasis] to meet the development needs of their area"*.
- 1.10. At Paragraph 1.14 it is confirmed that the consultation *"provides an assessment of the current context for Medway's economic, social and environmental conditions and the key issues that need to be addressed in **planning positively** for the areas future over the lifetime of Local Plan."* (our emphasis). Paragraph 1.15 goes on to consider *"The document provides a draft vision for Medway in 2035 and the strategic objectives that should underpin the approaches taken to the areas balanced growth"*.
- 1.11. Paragraph 3.29 of the DOR acknowledges that Scenario 2 would complement the urban regeneration taking place in central Medway, provide for development areas that are already attractive to residents, and on greenfield sites that may be quicker to develop than brownfield sites. This has the ability to provide for much needed family housing.

- 1.12. It is apparent that the area in Scenario 2 has good transport links and a proximity of a range of services which can be built upon. This has the benefit of improving the area for existing and future residents.

2. Section 2 of the DOR: Vision and Strategic objectives

- 2.1. At paragraph 2.5, the DOR comments on Medway's economy lagging behind the county and national averages, with productivity running at two thirds of the national level, whilst productivity in terms of GVA is the lowest in the South-East region (despite being the largest city in Kent and one of the largest in the South East). We therefore believe it is imperative that the Council reflects, in its Local Plan, the intention to be supportive of those businesses that are able to maintain and contribute to the growth of GVA. Especially where, in the case of AC Goatham and Son and its growing partners, current annual GVA of the business is £13.75 million. Our client therefore supports the vision that the Local Plan priorities should (as set out at paragraph 2.12) *"boost economic performance through supporting local businesses and attracting inward investment"*.
- 2.2. Our client supports the Council's recognition at paragraph 2.9 that growth does not mean losing character of an area.
- 2.3. At 2.14 consideration is given to promoting healthy eating and physical exercise. Whilst it is set out that planning can help contribute to healthier food environments by managing the availability of fast food outlets, acknowledgment should be given to supporting the industries/businesses that are responsible for the delivery of healthy produce, especially, as is the case with AC Goatham and Son, where it is the growing of fruit and management of the landscape.
- 2.4. At paragraph 2.17, the Kent and Medway Growth Deal 2014 recognises that to unlock economic potential *"backing business expansion through better access to finance and support"* should occur. AC Goatham and Son supports this vision being taken forward in the Local Plan. Whilst this sentiment may be set out as part of the *'Developing a vision for 2035' ("securing and developing its diverse business base and attracting inward investment in a range of quality employment sites"* – page 15 of the DOR) it is important that this is carried forward into the Local Plan.

3. Section 3 of the DOR: Delivering Sustainable Development - Options

3.1. This section of the DOR seeks to provide comprehensive options for how Medway could accommodate growth within the Local Plan for:

- 29,463 homes;
- 49,943m² of B1 office space, 155,748m² of B2 industrial land, and 164,263m² of B8 warehousing land; and
- 34,900m² of comparison retail space and 10,500m² of convenience (groceries etc.) retail space up to 2031.

3.2. Section 3 of the DOR reports that the Kent Strategic Housing and Economic Needs Assessment forms the base of the evidence to justify the Objectively Assessed Housing Need, however, it is not evident that this report makes allowance for the unmet need from London.

3.3. Further, it is not clear whether full consideration has been given to the duty to co-operate and whether Medway is to assist in the absorption of helping to meet other housing need from other Councils.

Options for Sustainable Development

3.4. We agree with paragraph 3.9 that *'It is unlikely that the full range of development needs could be met solely in the identified regeneration areas on brownfield land'*. Whilst it is commendable that the Council is to have regard to matters of environmental constraint, lesser landscape value and land used for agricultural purposes when considering potential greenfield sites for development, consideration must equally be given to being able to deliver development that is needed and which is or can be located near or adjacent to existing services, infrastructure or other built development (or which can provide such in the absence of).

- 3.5. To appreciate the extent of development required on greenfield land the Council should indicate the full extent of land they do consider deliverable on brownfield land. This would be useful in truly understanding the extent of development that could be distributed across the four scenarios presented.
- 3.6. The plans relating to all four scenarios are vague and one cannot therefore appreciate the full extent of that presented or the wider impacts that may result.
- 3.7. Paragraph 3.12 identifies that national planning policy does not preclude development on areas of agricultural land, nor those considered to have a higher land grade and the Local Plan must not therefore limit such.
- 3.8. A large part of the land within Medway Council and which remains undeveloped is of relatively high agricultural value and therefore to deliver the development requirement in the area, less weight will obviously need to be placed upon the value of agricultural land in the context of other matters and wider benefits delivered from possible development on site. Notwithstanding this, development that seeks to promote agriculture and inward investment in this industry should be supported.
- 3.9. Regard, such as that set out above at figure 3.4 and 3.8 must be given when considering development of agricultural land as should the wider operations of those seeking development on such land. With the latter often resulting in greater inward investment resulting in increased levels of employment and increased levels of land management across a wider landscape.
- 3.10. Furthermore, development on agricultural should be considered with regard to purpose. For example, development supporting agriculture should not be confined to the least versatile land (in agricultural terms) if it is to support the needs of the business in a particular location and/or its wider farming operation.

Scenario 1 (Appendix 1B) – Maximising the Potential of Urban Regeneration

- 3.11. This approach seeks to provide significant housing and employment development near to the existing urban centres and seeks to use land more intensively, re-address densities on existing allocated sites and land, and identify new ones.

- 3.12. Under paragraph 3.25 this option also considers that *‘there would still need to be consideration of suburban and rural areas as potential locations for new development, in order to meet a balanced development strategy’*. But the full extent of this is not clear.
- 3.13. Whilst, the identification of a need for housing and other development within rural areas is supported, restricting or constraining development largely to *urban regeneration* has significant implications on the vitality, social and economic well-being of rural and suburban communities. Where housing numbers are required to increase annually, it is necessary for all settlements to contribute to the delivery of dwellings, offering choice and variation to the market to provide the balanced growth required within the plan. Indeed, the provision of residential and economic areas outside of urban area can assist in congestion disbursement and investment in rural communities.
- 3.14. At Appendix 1B, reference is made to Hoo Peninsula providing the balance (up to 7,000 homes) of development need, but there is no indication how or where this would occur. Further detail would be needed on this, before our client could provide more compressive comment on this.
- 3.15. Paragraph 3.26 identifies the “risks” associated with Scenario 1 and our client cannot therefore support this scenario.

Scenario 2 (Appendix 1C) – Suburban expansion

- 3.16. This scenario provides greater consideration of the potential of the suburban areas to meet the shortfall between development needs and the pipeline of sites. This scenario does not appear to promote “urban only” or “rural only”, but rather seek a more balanced provision of development in a range of areas. It also appears to better support the Council’s vision of adopting an “urban waterfront”.
- 3.17. Development which includes the provision of services could help rejuvenate village and rural life. Increasing levels of population in villages / suburban areas can support existing services, businesses and infrastructure better.

- 3.18. Our client supports the principle of considering some locations on the Hoo Peninsula for provision of balanced development needs and these must be considered having regard to availability and deliverability and the potential ability to provide services as part of a scheme where necessary.
- 3.19. The SLAA 2017 document considered site SO2 which is owned by our client and which would appear on the periphery of the “mixed used development” ring as identified at Hoo. Whilst our client did not actively promote this site (indeed we are unsure who first raised it for consideration as an allocated site), our client does not discourage such an allocation. The location of this site between the existing leisure complex and the retail centre / shop at Homeleigh Nursery would appear logical. The topography of the land and the existing tree line at the front of the site means that a development scheme could be well incorporated into the landscape, whilst the proximity of the main road provides for easy access to the site. This would be a good example of where a greenfield site could be developed quickly but incorporating mitigation to manage perceived harm. Indeed, there would be the opportunity to incorporate a good level of “Green Infrastructure” based on existing features in the locality. Given the extent of land available at SO2 (and to the north) and in the same ownership, there is the opportunity to provide a “***mixed use development*** [our emphasis], *with housing supported by new services, shops infrastructure and jobs, and green spaces and linkages*”, as set out at paragraph 3.28 of the DOR. There is further logic in allocating a site such as SO2 given the location of the main road being the main artery road to access the Hoo Peninsula.
- 3.20. On behalf of our client we would comment that allocation on a site within the Green Belt, as per paragraph 3.30 of the DOR should be a last resort and only considered once other sites have been considered first. This would align with the “exceptional circumstances” test set out in national policy. We would expect sites such as S02 to be allocated before Green Belt ones.

- 3.21. We would observe that there is an area of mixed use development proposed to the south east of Rainham train station. Part of this site forms part of one AC Goatham and Son's holdings, Miers Court Farm (SLAA site 1063), and which is tenanted by our client to beyond 2030. Notwithstanding matters of suitability, in terms of availability we understand that this site would not be available for allocation. This is due to the existing long term tenancy agreement that remains in place and our understanding that the landowner does not wish to develop the site, other than for agricultural purposes. It should not therefore be considered for allocation during the Plan period.
- 3.22. As per the observation for Scenario 2, the location of the possible homes (2000 in this scenario), with supporting services should be identified before full comment can be made as to exact suitability.
- 3.23. However, there is wider logic to supporting Scenario 2 (save for the Green Belt allocation) given that it appears responsive "*to the availability of land being promoted*", as per the claim at Appendix 1C. This means there is a better chance of deliverability.

Scenario 3 (Appendix 1D) – Rural Focus/Hoo Peninsula focus

- 3.24. In this scenario, consideration is given to the potential of the rural area in contributing to the development strategy and meeting development needs. *'In this scenario, the Hoo Peninsula is considered as a potential location for growth.'* The scenario highlights that further development on the Hoo Peninsula could deliver: 2600 homes, primary schools, parks, health and community facilities through *'the expansion of a number of villages that are considered to have a range of services and facilities that could support an increased population.'* This scenario could seek to provide *'enhanced services and infrastructure to meet the needs of a growing population'*.

- 3.25. Scenario 3 identifies that “*the key* [our emphasis] *component is the possible expansion of Hoo St Werburgh into a small town*”, to serve the wider Peninsula. However, it does not detail the full extent of this or the services that are needed to support such growth. Notwithstanding this point, the allocation of the applicant’s own SO3 would appear more logical for development than sites toward the south of the existing Hoo village to keep vehicle movements adjacent to the primary road network of the Ratcliffe Highway for better services to the wider Peninsula. Not only is this more suitable for larger vehicles, it reduces the amount of traffic going through the smaller road network in the village of Hoo. Further, this would better align with the Council’s own ambition for developing Lodge Hill, given the closer proximity of SO2 to Lodge Hill and its location between the existing leisure centre and retail complex at Homeleigh Nursery.
- 3.26. We observe the intended expansion to the east of Rainham Station. However, this would appear illogical as it avoids the opportunity to “infill” to the north west as per the locations set out at Scenario 2.
- 3.27. Whilst our client is not averse to a “Rural focus”, in its current form, our client cannot support Scenario 3.

Scenario 4 (Appendix 1E) – Urban Regeneration and a Rural Town.

- 3.28. This scenario brings together elements of the previous three approaches. Of particular note is that ‘*aspects of the rural focus scenario are supported, for their potential to deliver planned development that could enhance the provision of services and jobs on the Hoo Peninsula.*’. Whilst the enhancement of service and jobs on the Hoo Peninsula is supported, there are many aspects of this Scenario which are not supportable.
- 3.29. Paragraph 3.41 of the DOR identifies the “complexity” of the Medway City Estate and Chatham dock sites which in this scenario are identified as potential sites for significant residential areas. This does not provide assurance that these sites are deliverable for significant residential development - a crucial requirement in the formation of a local plan. Furthermore, it is understood that these are areas already allocated as “employment” land, and it would therefore seem logical to retain the status quo, allowing new residential (with supporting infrastructure) to be developed on Green field sites where matters such as contamination are not an issue and where housing can be provided at far greater speed to meet the needs of Medway.

- 3.30. Appendix 1E says that Scenario 4 aims to restrict urban sprawl. However, as identified at figure 3.42 of this report, the Council propose expansion east from Rainham Station. This would appear illogical when there is the opportunity to “infill” to the north west of Rainham Station as per Scenario 2.
- 3.31. Scenario 4 again identifies the allocation of Lodge Hill, and on this basis, as per paragraph 3.23 above it would appear logical, if such an allocation is being pursued to “round off” the mixed used development proposed north of the Ratcliffe Highway (including site SO2 which is sandwiched between a leisure development site and a retail complex) rather than expansion to the south of the village of Hoo, which only diverts traffic through the existing, limited road network.
- 3.32. At paragraph 3.42 of the DOR it is set out that *“The Green Belt land to the west of Strood is not released, with preference given to using land in other locations.”*. This particular point is supported.

4. Section 4 of the DOR: Housing

- 4.1. The Council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of the wide-ranging needs of a growing and changing population.
- 4.2. In order to deliver new housing of an appropriate tenure it is recognised that new affordable housing would need to be delivered as part of most new development as outlined in the Strategic Housing Needs Assessment 2015. Whilst this approach is admirable, affordable housing should be provided only where it is viable to do so, whilst a lack of affordable provision should not prevent development being considered acceptable where it may contribute to delivering housing / employment land.

5. Section 5 of the DOR: Employment

- 5.1. The consultation confirms that a core ambition of the Local Plan is to strengthen the performance of Medway's economy, securing quality jobs in the local area, capitalising on the further and higher education offer, and realising the area's potential as the largest city in Kent, enjoying a strategic location in the Thames Gateway. The Council supports opportunities to strengthen the local economy through encouraging development of businesses in successful growth sectors, and diversifying the employment base. This ambition is supported by our client.
- 5.2. Paragraph 5.3 sets out the specialism Medway has in manufacturing and advanced engineering. Due to the regional and national success of AC Goatham and Son as Medway's Business of the year 2016, Kent Chamber of Commerce Business of the year 2017 and the extent of national growing awards won and grant funding allocation made, we consider that Horticulture should equally be recognised as a specialism and significant contributor to the area. This would align with that recognised at figure 5.24 of the DOR.
- 5.3. Paragraph 5.6 recognises that just under a quarter of Medway's residents have no qualifications, whilst going on to recognise at paragraph 5.7 of the DOR that Medway has the potential to significantly boost its economic performance. Businesses such as AC Goatham and Son which contribute significantly to this (last year 80 of their staff were studying for NVQs whilst as identified above at figure 2.1 current annual GVA of AC Goatham and Son and its growing partners is £13.75 million) must be supported in their growth.
- 5.4. Paragraph 5.10 of the DOR once again highlights the strengths of the economy being manufacturing and technology industries. However, we once again consider that the horticulture industry should not be overlooked but rather should be included within this, especially given that AC Goatham and Son have been recognised as a national industry leader in the top fruit sector, investing in cutting edge storage and packing facilities and developing innovative growing techniques and fruit tree varieties.

- 5.5. The Employment Land Needs Assessment as per paragraph 5.14 of the DOR identified that existing economic assets [of which we consider AC Goatham to be one], are likely to drive future economic opportunity. Again, no recognition is given to the horticultural industry being a key component in the future industry.
- 5.6. Our client would agree with the view at 5.16 of the DOR that “*Economic growth could also be driven by new opportunities created by major investment in new infrastructure*”. Flanders Farm is one such example where the £10million investment in further cold store and packing facilities has led to the long term lease of 175 acres of land on the Hoo Peninsula and further invested already worth in the order of £2.1million (for trees and irrigation alone).
- 5.7. It would appear that a large emphasis is being placed on the intention to increase the productivity of Medway’s economy as part of the Economic Development policy approach. This is supported. We note that the policy approach is to assess “*all planning applications*” for employment uses against their GVA contributions. Whilst we would support economic development that can offer GVA contributions, we would comment that the requirement to demonstrate GVA contributions for all economic development (however small) is likely to be over burdensome and problematic.
- 5.8. We consider that it is important for the Council in their *Policy Approach* (on page 47 of the DOR) to acknowledge that they will support actions to provide infrastructure in support of rural economic development which can include, but not be limited to, storage facilities for crops, workers accommodation, facilities to get crops packed for sale, etc and this is vital in rural locations to support rural businesses, the efficiency of their operations and as a result a contribution to the economy and of course management of the wider landscape.
- 5.9. Whilst figure 5.23 seeks to identify the classification of agricultural land, the source of this data is not set out. Notwithstanding this, as per figure 3.8 and 3.10 above the potential to develop on different land grades must not be prejudiced by land grade alone, but must seek to look at the wider needs for development including land availability and deliverability. As already set out, the need for development must also be seen in the context of a specific location having regard to the purpose it serves and the benefits derived in the wider environment.

- 5.10. Our client was pleased to see that paragraph 5.24 of the DOR recognises that horticulture represents “*the most valuable agriculture sector in the region*”, whilst it potentially offers the equivalent to 11% of the national resource of top and soft fruit. In light of this, it is very important that the Local Plan reflects onward support for growth of the businesses that contribute to this.
- 5.11. Recognition of the requirement for seasonal skilled labour at 5.25 of the DOR is welcomed, as is the acknowledgment in difficulty associated with movement restrictions. However, the report does not then acknowledge the relative requirement for accommodation to overcome such matters whilst also serving the functional requirement of the land. This should be carried forward into the Local Plan.
- 5.12. Our client is supportive of the Council’s recognition at 5.26 that “*Diversification and consolidation of farming activities is an important consideration in securing the rural sector*”, especially where this can generate or release equity to support the principle activity of agriculture in a business.
- 5.13. We are pleased to see the recognition that in forestry and farming there is often a need for supporting infrastructure which includes processing and packing facilities as recognised at paragraph 5.27. Whilst it is acknowledged that consideration of the needs of rural businesses with safeguarding the character of the countryside needs to be considered, regard must also be given to the other economic and social benefits brought about as a result of a proposal as per the NPPF. The character of the countryside must not therefore be seen in isolation.
- 5.14. We are pleased to see the *Policy Approach to the Rural Economy* is to “*support the land based sector.... where the proposals can demonstrate positive benefits*”. However, it is considered important that the Policy Approach to protecting the countryside is not just seen in the context of the particular site in which development is proposed, but the wider benefits to the countryside and rural economy.
- 5.15. The *Policy Approach: Rural Economy* points out that “*The council will seek the retention of key rural services and facilities to promote sustainable villages, providing for the needs of rural residents*”. Our client considers that there should be more emphasis on the provision of jobs in rural areas.

6. Section 9 of the DOR

- 6.1. We support the Council's recognition at Section 9 of the DOR that planning should support access to healthy and affordable food, including opportunities for food growth. We therefore consider it important that the Local Plan supports businesses seeking to grow and provide healthy food options and reduce dependence on food imports.

7. Summary

- 7.1. It is considered likely that elements of all four development option scenarios will need to be considered to deliver the Local Plan. Crucially, however, emphasis must be on being able to deliver a Local Plan and on this basis Scenario 2 would appear the most suitable given that it is derived from "*the availability of land being promoted*", as per the claim at Appendix 1C.
- 7.2. Any reliance on the development of the Hoo Peninsula must be more comprehensively set out to appreciate its full extent, to understand the extent of infrastructure required to meet the existing need and any forecast need. Only then can an assessment be made on whether a focus on the Peninsula is appropriate and in what capacity.
- 7.3. In employment terms, our client supports the Council's intention at paragraph 5.10 and 5.11 to attract inward investment, support local business and improve the skill level of residents. However, the ability to deliver this must be supported in the Local Plan and crucially, reflected in subsequent decision making.
- 7.4. It is welcomed news that the Council recognises the particular importance of the horticultural sector to Medway and consequentially the importance of Medway in contributing to the top fruit sector both regionally and nationally. The importance of this must be taken forward into the Local Plan.
- 7.5. It is critical that when the Council are looking at policy that impacts on the rural economy that consideration is given not just to perceived impacts and benefits at that specific site, but on the wider area, whether it be in landscape, social or economic terms.



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Mr K Maryott
Planning Policy Team
Community & Culture Medway Council
Gun Wharf Dock Road
Chatham
Kent
ME4 4TR

Your Reference: Site 1014
Our Reference: 06.021.1649

18th April 2017

Dear Mr Maryott

Medway Strategic Land Availability Assessment – Further information and consideration of Land at Whetstead, Grange Road, Lower Twydale

We are writing on behalf of our clients Mr and Mrs Friday with regard to the potential allocation for residential development of land at Whetstead, Grange Road, Lower Twydale (known as site 1014).

The Council has published the 'Medway Strategic Land Availability Assessment' document. This document is part of the review to the Plan and discusses housing development between 2011 and 2035. We would like to take this opportunity to clarify various points raised as part of the Council's previous assessment of this site within the specified areas, as follows;

Response to Medway Strategic Land Availability Assessment 2015

Under the '**General Suitability of the site**', the Medway Strategic Land Availability Assessment comments that the site has poor access to **services and facilities**, and **public transport opportunities**.

Although, in order to assess the sustainability of settlements it is relevant to consider the facilities contained within other nearby settlements to the site of similar size and their accessibility by private or public transport to certain key facilities whether it is within the settlement itself or in a nearby settlement. In this instance the rural nature of much of Medway means that there are a number of settlements of varying sizes and function. Furthermore it is clear that the size of the settlement does not necessarily relate to the number of facilities it has or the role it undertakes. It is not unreasonable to assume that many settlements within Medway look to towns and cities within and outside of the Authority to meet certain needs. Owing to the nature of the settlements it is considered that there are very few or possibly no single rural or small settlement within Medway that can for certain meet all the needs of the residents for the purposes of shopping, health care facilities and education provision.

However, this site is not located within the rural part of Medway. This site is located very close to the built confines of Gillingham, actually only 200 metres of the A289, and within only 300 metres of the roundabout junction of the A289 with the B2004. Therefore, whilst the site is

located outside of any development boundary as identified by the historic Local Plan of 2003, it is strongly submitted that this site is in fact located such that it should now be said to have reasonable access to services and facilities, and public transport opportunities.

It is noted that the 2017 SLAA Report sought to review criteria reflecting comments received after publication of the SLAA in 2015. Transport was reviewed so that the proximity of the site to an existing transport interchange (bus stop or train station) was inputted. Also if the site had a capacity of greater than 10 units then it was seen as potentially being able to provide a contribution to improve public transport accessibility. It is considered that the proximity of this particular site to existing transport interchanges, and acknowledgement that this site could accommodate more than 10 residential units, would have the effect of enhancing the suitability of the site for development in relation to access to services and facilities, and transport opportunities.

It had already been identified that strategic infrastructure upgrades may address any congestion hotspots. It is submitted that there is sufficient capacity to ensure developer contributions would address any **Highway Network Capacity** constraints.

The Medway Strategic Land Availability Assessment considers that the site has an existing suitable vehicle **access** via Grange Road and Lower Rainham Road. This is welcomed.

It is commented in terms of the **ecological potential** and **designated habitats** at the site, that the presence or absence of protected species and/or habitats is not established at this stage of the plan-making process. However, it is acknowledged that further assessment would need to be undertaken through the Local Plan or Development Management process in order to establish the ecological potential at the site. This should not therefore be seen as a constraint to the potential allocation of this site for residential purposes.

It has been commented that the site is situated outside of the built-up area (as defined by the historic Local Plan of 2003) and within an area of locally valued **landscape** which is considered to be sensitive to change. It is commented that development at the site is therefore likely to have a detrimental landscape impact.

However, it is strongly submitted that the location of this site within a wider area which has broadly been designated as a locally valued landscape does not automatically mean that development at this individual site would have a detrimental landscape impact. Indeed, the Council's own description of the site as part of the site's assessment is that the site "*has a scrappy appearance of relatively low landscape value and quality*". This being said, it is put forward that any development at this site could actually reasonably be said to be likely to result in an enhancement to the character of the landscape in this locality.

The following comments made by the Council are welcomed and agreed;

- Development at the site is unlikely to have any impact upon designated heritage assets;
- Air pollution mitigation is likely to be deliverable;
- Contamination is likely to be capable of mitigation;
- The site is free from known development 'abnormals';
- Development would not result in the loss of any agricultural land;
- The site is not designated open space;
- The site is at low risk of flooding;
- The site is unlikely to be constrained by noise pollution;
- A site layout could be designed to prevent undue impact upon neighbouring property;
and
- The site is not designated employment land.

In light of the above it is clear that all of the issues identified with the previous Strategic Land Availability Assessment can be overcome or have been acknowledged as being acceptable. As such, it is respectfully submitted that the Council should not previously have concluded that the site was unsuitable for development unless identified constraints could be addressed.

2017 SLAA Report

As referenced above, it is noted that the 2017 SLAA Report sought to review criteria reflecting comments received after publication of the SLAA in 2015. It is noted from your email of 5th April 2017 that, following the update the site remained unsuitable on the grounds of access to centres and agricultural land value. It is also noted that there were still some concerns as to the landscape.

With regards to **access to centres**, it is noted that the site has been considered to be located such that no 'centre' is located within 800m of the site. It is noted that centres are defined as those identified in the historic 2003 Local Plan. This may or may not be an accurate reflection of the sites which would be considered to constitute a centre today. Nevertheless, it is submitted that the site is nevertheless within close proximity to the A289 and the B2004 and so should now be said to have reasonable access to services and facilities, and public transport opportunities. It is considered that the site being more than 800 metres from a defined 'centre' is not sufficient in itself to conclude that the site does not benefit from appropriate access to centres.

With regards to **agricultural land value**, the site is noted to be grade 1 or 2 agricultural land. However, this is not the case. The site is noted within previous descriptions to be in use for the storage of vehicles, and various equipment/machinery and scrap. The previous assessment of this site within the Medway Strategic Land Availability Assessment 2015 also noted that "*the site is on the edge of the built up area and development would not result in the loss of any agricultural land*". It is therefore respectfully submitted that the site should be considered acceptable for residential development on this ground.

With regards to **landscape**, it is noted that the site has been considered to fall within the 'yellow' category, which means either or both the sensitivity and condition of the landscape is moderate as per the Medway LCA 2011. Whilst the site may fall within a broader area where either or both the sensitivity and condition of the landscape is moderate, it is respectfully submitted that this specific site is of relatively low landscape value and quality, as concluded within the site's previous assessment.

Whereas, under the 2017 SLAA report, sites that are Previously Developed Land are categorised as 'green' (i.e. suitable in this respect). In this case the site is considered to constitute Previously Developed Land, given that it accommodates "*a large yard used for the storage of vehicles and various equipment/machinery and scrap*". As such, it is considered that the site should in fact have been found to be acceptable in terms of landscape impact.

Development Options

Notwithstanding the above comments in relation to the SLAA, it is noted that the SLAA is looking at the individual site suitability, rather than as part of the wider area development potential. It is recognised that the development options which have been put forward by the Council attempt to do this.

With regards to the wider area development potential, it is noted that four scenarios are presented for consultation, as well as an assessment of which approach could deliver the most sustainable development pattern for Medway, meeting the aspirations set out in the vision and

the strategic objectives in the Local Plan. It is noted that this consultation seeks additional information on the potential contributions that locations could offer for Medway's successful growth, as well as constraints and negative impacts that need consideration and may restrict development.

It is acknowledged that areas proposed for development as part of each of the development scenarios represent broad locations that are being tested and not allocations at this stage. However, it is noted that for each of the development scenarios, namely, maximising the potential of urban regeneration, suburban expansion, rural focus, and urban regeneration and rural town, site 1014 falls within a broad area which is designated for 'mixed use development'. All four development scenarios are therefore welcomed by the landowner.

It is further acknowledged that this does not mean that site 1014 may be developed no matter which development option is pursued by the Council. It is understood that, within the broad location areas the Council is yet to decide the SLAA sites that will form part of them and where the different land uses and infrastructure within them will be located. However, the inclusion of site 1014 within an area designated for mixed use development as part of the alternative development options is welcomed. For the reasons identified within this submission, it is put forward that site 1014 would be particularly appropriate for such allocation.

Permitted Development

As part of the assessment of site 1014, the description of the site includes reference to a large yard used for the storage of vehicles. Whilst perhaps not a consideration for the policy-making process, this is also considered to be a material point for decision-making purposes. Namely, the change of use of buildings (and curtilage) currently used for commercial storage purposes to residential use is now a development not requiring full planning permission. This is by virtue of Schedule 2, Part 3, Class P of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Further to this, the wider policy approach to the re-use of rural buildings has changed significantly in the last few years. The conversion of a redundant rural building where there would be an enhancement to the immediate setting can constitute sustainable development and this being the case Paragraph 28 of the National Planning Policy Framework encourages a positive approach.

Whilst the above point is relevant and should be taken into account the landowner would prefer to work with the Council in promoting this site as part of the SLAA to encourage a full comprehensive redevelopment of this site.

I thank you in advance for your consideration of matters. Please do not hesitate to contact me if you have any queries.

Yours sincerely,



Gary Mickelborough
BSc (Hons) MA MRTPI
Director



Boxley Parish Council

www.boxleyparishcouncil.org.uk

Chairman: Bob Hinder
Clerk: Pauline Bowdery
Asst Clerk: Melanie Fooks

Medway Council

15 February 2017

Medway Council Local Plan consultation

Response approved by Environment Committee 13 February 2017 Minute
2958/10

Policy Approach: Housing Delivery

The council will seek to provide a supply of land to meet the needs for market and affordable housing for 29,463 homes over the plan period, meeting the principles of sustainable development.

Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.

Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.

Boxley Parish Council considers that development in the Capstone area is unsustainable due to lack of public transport service infrastructure and the probability that local bus companies would not be willing/able to provide a comprehensive bus service. There is strong concern that increased traffic on the already inadequate highway infrastructure will result in unacceptable congestion. See response to the Sustainable Transport.

It is felt that the Capstone site should be withdrawn from the Local Plan as Medway Council must refuse any development as under the Transport Approach criteria it is **required to "refuse development where its residual cumulative impacts are severe."**

Boxley Parish Council has grave concerns about the effect of development on health centres, hospital beds and schools that all need to proportionally increase in size to meet housing developments

Employment land needs

Boxley Parish Council strongly supports the plan to attract high quality commercial engineering etc. to Rochester Airport however, without a clearly agreed programme to upgrade junction 3 of the M2 this will be unsustainable and lead to severe and unacceptable traffic congestion. In January 2017 Kent County Council confirmed what **was already locally known that** *"These junctions [A229 Blue Bell Hill and M2] have greatly exceeded their design capacity and handle volumes of traffic for which they, and the surrounding road network, were never intended. There are no suitable options for improving traffic flows through the adjustment of signal timings; physical works on the highway network are required. Mixed Used Development at Capstone will add to the*

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[REDACTED]

already severe traffic issues on rural and local roads". See response to the Sustainable Transport.

Natural environment and green belt

Boxley Parish Council welcomes Medway Council's stated response for the protection of the natural environment but feels that this statement is at odds with Medway Council's decision to allow the release of greenfield land at Capstone.

Healthcare facilities

Boxley Parish Council welcomes Medway Council's honest summary of the issues being faced by the NHS and the problems that communities face in getting medical care and attention. No development should be allowed until the healthcare providers have in place GPs to take on a new surgery or clear commitment to creating another staffed local healthcare clinic which should become operational as properties are occupied. In the Walderslade/Lords Wood area of Boxley Parish it is currently almost impossible to get a **doctor's appointment within two – three weeks.**

There is no mention on the effects of health centres, hospital beds and schools that all need to proportionally increase in size to meet housing developments.

Education

Boxley Parish Council welcomes Medway Council's approach.

Utilities

Policy Approach : Utilities

Any new development is to be supported by the requisite utilities infrastructure. Significant new development proposals shall be assessed as to the impact on the existing network (water, electricity and gas). Any developers that would create a level of pressure that could not be accommodated within the existing capacity will be expected to contribute towards new infrastructure through the developer contributions **mechanism.**

Having recognised that Medway is in an area of water stress Medway Council should strengthen this policy approach by including a requirement that all future developments should be designed to include grey water, recycling and other water saving measures. This policy makes no mention of renewable energy.

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E-mail: [REDACTED]

[REDACTED]

Sustainable Transport

Policy Approach: Transport

The council will work with the relevant authorities and transport providers to:

- **support the Medway Local Transport Plan (2011-26)** and subsequent iterations during the plan period, along with the associated three-year Implementation Plans and strategies
- **ensure development is located and designed to enable sustainable transport**
- **mitigate the impacts of new development according to Transport Assessments and Transport Statements**, or refuse development where its residual cumulative impacts are severe
- **require a Travel Plan for development which will generate significant amounts of movement**
- **plan for strategic road network and rail improvements**
- **improve public transport provision and the walking and cycling network**
- **improve 'park and ride' services**
- **engage with the relevant authorities to address the impacts of the proposed Lower Thames Crossing**
- **undertake any necessary revisions to the adopted Parking Standards**
- **improve air quality as a result of vehicular emissions**

Boxley Parish Council has grave concerns about the lack of planned work to improve the local highway infrastructure serving the suggested Capstone development and the tributary roads that lead to and from junction 3 of the M2 (Walderslade and Lordswood areas).

The Highways England Route Strategies consultation document, the Kent County Council Local Transport Plan 4: Delivering Growth without Gridlock 2016 – 2031 consultation document and the Medway Transport Priorities document fail to address the traffic issues at junction 3 of the M2 even though KCC acknowledges that ***"These junctions [A229 Blue Bell Hill and M2] have greatly exceeded their design capacity and handle volumes of traffic for which they, and the surrounding road network, were never intended. There are no suitable options for improving traffic flows through the adjustment of signal timings; physical works on the highway network are required"***. The 2016 Planning Appeal for Gibraltar Farm, Ham Lane (MC/14/0324) identified that traffic from any development at this area, which is at Capstone, would use junction 3 of the M2 rather than junction 4. The Transport Assessment Report also identified the Gleaming Wood Drive and Lordswood Lane junction had reached capacity and traffic from the Capstone area would use this road network to access the M2.

Any development at Capstone will be unsustainable as a) all vehicle movements will be via small local roads many of which have junctions that are at or already exceeding capacity, b) junction 3 of the M2 already greatly exceeds capacity and there are no plans, even if the Lower Thames Crossing does progress, for improvements and c) the smaller road networks connecting the development to A roads are unsuitable for additional traffic.

Maidstone Borough Council's **Local Plan proposes over 17,000 properties** and some of the occupiers will work in the Medway Towns and visa versa. Gleaming Wood Drive, Westfield Sole Road and Lidsing Road/Boxley Hill (an alternative M20/M2 route to the A229 and A249) are already congested and additional development in Maidstone and the Capstone area will add to the problems.

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Yours sincerely



Pauline Bowdery
Clerk to the Council

Beechen Hall, Wildfell Close, Chatham, Kent ME5 9RU

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Date: 16 March 2017
Our Ref: 16.4114/08.01

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Planning Policy Team
The Planning Service
Medway Council
Gun Wharf, Dock Road
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Dear Sir/Madam,

Development Options Local Plan – Representations by NHS Property Services Ltd

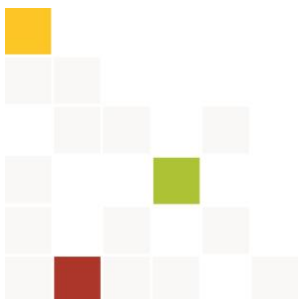
We are writing on behalf of our clients, NHS Property Services Ltd (NHSPS), in respect to the Council's Development Options version of the Local Plan which is currently out for consultation. NHSPS own, maintain and improve around 3,500 properties nationwide on behalf of the NHS, a key role being the disposal of properties which are no longer required by the NHS, maximising and securing a capital receipt which is then reinvested back into the NHS.

We are writing specifically in relation to the former St Bartholomew's Hospital site, a highly sustainable previously developed site located in close proximity to Rochester town centre and Rochester and Chatham railway stations. The former hospital site was declared surplus to requirements by Medway CCG in May 2016 and has been vacant since September 2016. Initial proposals for the residential redevelopment of the site have been prepared with a pre-application submission being made to Medway Council in December 2016 with discussions with planning officers currently ongoing.

On this basis, the fact that the site is identified as being suitable and available for a solely residential development in the first 10 years of the Plan period by the Council's latest SLAA (site ref: 144 [January 2017]) and Authority Monitoring Report (Volume 2 [December 2016]) is strongly supported. We do consider, however, that given the current stage of the emerging scheme proposals and the fact that the site is within a single ownership means that new development at the site could be delivered in the first 5 years of the Plan period.

Delivering Sustainable Development

In order to meet the Council's development needs, four development scenarios have been examined by the Council. Central to each option is that development of previously developed sites will take precedence over the release of greenfield sites (paragraphs 3.6 and 3.19). This approach is supported and is consistent with national policy.



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Housing

Policy Approach: Housing Delivery

The Council's objective of meeting its full objectively assessed housing need is supported and it is acknowledged that new development should be phased to ensure an appropriate supply over the plan period. Given the Council's stated objective of delivering new housing on previously developed sites prior to the release of greenfield sites, we would expect such sites to be phased for delivery in the early part of the plan period.

Policy Approach: Housing Mix & Affordable Housing

We would support the general approach of the policy to seek an appropriate mix of market housing to provide a range of house types and sizes to meet local need and welcome recognition that this mix must be appropriate to the size, location and characteristics of the site.

In terms of affordable housing provision, the supporting text acknowledges the need to undertake further viability testing to inform the proposed level of affordable housing that will be sought within new developments (paragraph 4.11). In the absence of this work, it is clear that the draft policy at this stage can only set out broad aspirations in terms of affordable housing delivery. Notwithstanding this, we consider that it is important that the emerging policy has proper regard to national policy, for example there should be an acceptance by policy that in applicable circumstances the Vacant Building Credit, as set out within paragraph 21 of the National Planning Practice Guidance, will apply. In addition, it should also be clear that where it can be demonstrated that there are issues surrounding scheme viability, a lower provision of affordable housing may be accepted by the Council. This is standard practice. These matters are particularly relevant for previously developed sites and so we consider it is important that the Council acknowledge this in policy as to provide clarity that the Council will be proactive in ensuring that such sites are delivered.

Whilst the Council's desire for large development schemes to make sufficient consideration to custom and self-build plots is understandable, we consider it difficult to see how this objective could be achieved given issues around deliverability. In our view it is important that the Council is explicit on what 'sufficient consideration' means and also what other sites may be suitable for self-build housing (paragraph 4.47). Accordingly we would reserve the right to comment further on this once additional detail is known.

Built Environment

Policy Approach: Housing Design

As is acknowledged within the supporting text to this proposed policy in order for the Council to require compliance with the Nationally Described Space Standards there is a need to provide evidence including viability justification (paragraph 8.6). The policy requires compliance with these standards however no evidence has been yet provided by the Council. Until such time that this evidence has been provided, compliance with these standards should not be specified. In addition, the recently published Housing White Paper states that it is the Government's intention to review these standards given the concern that a one size fits all approach may not reflect the needs and aspirations of a wider range of households (paragraph 1.55 of the Housing White Paper).

The publication of the White Paper emphasises the need for the Council to take a flexible approach to requiring compliance with space standards. In part, this could be assisted by recognising that where proposals involve the conversion of existing buildings, there will be flexibility on the application of space standards as is acknowledged within the current Medway Housing Design Standards.

Policy Approach: Density

The Council's proposed approach of seeking to achieve a density of development appropriate to the characteristics of the site, rather than a standard minimum level, is supported.

Policy Approach: Heritage

The Council's general approach to the historic environment is welcome, especially the objective of encouraging development that makes sensitive use of historic assets, particularly where they are under-used or redundant. Within the last bullet point, the Council state that the demolition of heritage assessment will need to be supported by justification that the benefits outweigh the loss of demolition. In the interests of clarity, we consider that this requirement should only apply to 'designated' heritage assets in accordance with guidance set out within paragraph 133 of the NPPF.

Sustainable Transport

Policy Approach: Vehicle Parking

The basis for the Council's car parking standards is set out within guidance published in 2004 and 2010, both of which predate the written ministerial statement of 2015. Whilst the supporting text makes some reference to a potential review of standards, there is no explicit statement that a review would be taken (paragraph 11.27). Notwithstanding this, for the purposes of flexibility we consider that the policy should include the statement that planning applications will be determined in accordance with the adopted Parking Standards (or any subsequent update).

The supporting text outlines that the Council is considering alternative approaches to car parking provision in some circumstances, such as high density development in close proximity to train stations and that car club membership is seen as a measure to significantly reduce car parking provision. Overall, the Council consider that there is no single solution to parking provision with developments likely to use a combination of measures, depending on residential density, proximity to public transport and market conditions. This flexible approach is supported.

In terms of the proposed policy, the third bullet point states that parking within the front curtilage of a property should be avoided. It is assumed that this seeks to discourage inappropriate parking in such areas however well designed schemes that include frontage parking at the outset can avoid any adverse impacts and so we consider that it is important that this policy objective does not prevent such schemes coming forward.

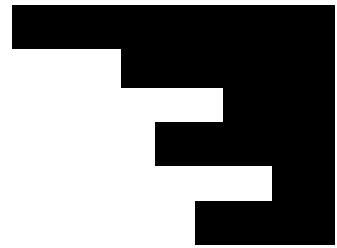
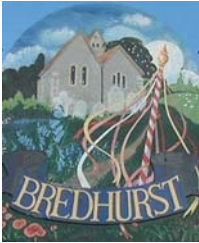
I trust that the Council will take into account our representations within the next version of the draft Local Plan.

Yours faithfully



Philip Allin
Associate Director





BY EMAIL TO - futuremedway@medway.gov.uk

Planning Policy Team
Planning Service
Medway Council
Gun Wharf
Dock Road
Chatham
Kent, ME4 4TR

13th April 2017

Dear Sir / Madam

Ref: MEDWAY COUNCIL LOCAL PLAN 2012 - 2035

Thank you for forwarding this to Bredhurst Parish Council for their views and comments.

We have examined this and we are minded of the magnitude of your task, regarding the numbers of homes and commercial aspects. However, we would like you to please take into consideration the following points.

We are a small Village, within the Borough of Maidstone, but bordering onto Medway.

Our main concerns relate to infrastructure - mainly roads, which at present are congested at peak times. We experience tailbacks from Maidstone to the top of Boxley Hill. Also traffic into Medway from this area is also very heavy.

When considering the increased housing and jobs planned in Maidstone, together with those in Medway, our vision is total gridlock, unless major infrastructure is addressed prior to the delivery of projects.

We are minded of the Planning Application for Gibraltar Farm which was granted at Appeal, and being minded of the gridlock currently occurring at the Motorway Junctions, a major transport assessment is required.

Further we have concerns regarding support services, such as Hospitals, Doctors and Schools, and urgent consideration is required now, to facilitate these, as they are all currently over stretched.

Therefore all proposed developments within urban areas need to be self-sustainable, and the landscape infrastructure and ecology environment needs to be engaged within your overall plan.

As a Parish Council, we are always willing to come and discuss our concerns with you, and to assist in the delivery of your Local Plan.

Yours sincerely,

Bex Ratchford

Parish Clerk



www.bredhurstpc.kentparishes.gov.uk

www.facebook.com/BredhurstParishCouncil

Brian Kingston,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

Medway Council Local Plan 2012-2035,

Planning Policy, Regeneration, Culture, Environment and Transformation,

Medway Council,

Gun Wharf,

Dock Road,

Chatham,

ME4 4TR

RE: MEDWAY COUNCIL LOCAL PLAN 2012-2035

To whom it may concern,

I note that all 4 proposed scenarios in the Medway Council Local Plan 2012-2035 include options for development in the Capstone/ Darland area, on what is currently designated 'Green Infrastructure'.

I am particularly concerned that any future development, in addition to the existing granted planning permission in the Darland Farm area, will result in the fragmentation of the existing

‘green infrastructure’ in the Capstone/ Darland area. Currently, Darland Banks, Luton Recreation Grounds and Capstone Farm Country Park provide a large block of almost continuous green space, stretching southwards through the Capstone Valley and connecting to the Kent Downs Area of Outstanding Natural Beauty (AONB).

Any future development will change the character of the Capstone/ Darland area from rural to suburban or even industrial in nature as the area is earmarked ‘mixed use development’ in 3 of the scenarios.

Future development will result in the destruction of the current ‘Wildlife/ Habitat Corridor’ connecting the Kent Wildlife Trust’s Darland Banks, Luton Recreation Grounds and Capstone Farm Country Park southwards through the Capstone Valley to the open countryside at the Kent Downs AONB. The currently granted planning permission at Darland Farm is already restricting this, any more development will severely impact on wildlife populations at the Kent Wildlife Trust’s Darland Banks site. Wildlife/ Habitat Corridors are necessary for colonization expansion, migration of species and non-inbreeding of species. When areas of land are broken up by human interference/ development, populations can become isolated, both genetically and geographically and may become unstable and unsustainable. I note from Kent Wildlife Trust’s webpage information on Darland Banks that it is the Trust’s most diverse reserve and contains the largest population of Man Orchids in the country. In short, the Capstone Valley/ Darland development options outlined in the various scenarios will lead to the loss of biodiversity in the area through the erosion of the existing wildlife/ habitat corridor.

I have also concerns over traffic and congestion on the local road network in the Capstone/ Darland area. The narrow and sinuous Ash Tree Lane in particular currently suffers from serious traffic build ups most days going northwards between Beacon Road and the A2. Any further development in the Capstone/ Darland area will only exasperate this.

I trust that my above concerns will be sympathetically addressed in any future plan created by the council.

Yours Sincerely,

Brian Kingston.

From: Brian williams [REDACTED]
Sent: 28 February 2017 09:35
To: futuremedway
Subject: Medways local plan.

Follow Up Flag: Follow up
Flag Status: Completed

Good Morning.

My name is Brian Williams and I live in High Halstow On the Peninsular.

My thoughts on your local plan are as follows.

Yes we need houses, yes we need every thing else that encompasses this fact.

I have nothing against more houses on the peninsular BUT to put things in prospective.

An extra 6,000 houses would give us a minimum of 9,000 extra cars, the road network is already at breaking point.

Yes I know that the intentions are to build a new slip road coming on to the peninsular, great that will help getting on,

But getting off ?

We need a second 2 lane road coming on and through to line up to the main road through to Grain,

Yes the B2000 is two lane but only through to Cliffe, then its single lane and a bottle neck,

Until the two ways on to the peninsular are joined properly the thought of more housing is completely crazy,

Secondly Medway hospital is under extreme pressure, it needs to be moved and if possible and I know its a big one to the Lodge Hill site, then turn the existing Hospital site into a new housing.

Its a very big topic and will be hard to manage,

More housing leads to more schools, doctors, shops, water supply's, drainage (Big Problem if its bricks and mortar, then there's green spaces (which will be hard to find has they will get turned to housing.)

You cant afford to lose A1 land like around High Halstow, now coming out of the EU, we need land to grow more of our own food.

Developers like fields ,, no clearing up, more profit, farmer like to sell their fields who wouldn't instant millionaire But

First Sort out the infrastructure then look at what you can put in.....

Best of luck

Brian

Medway Local Plan 2012 – 2035

Thank you for inviting comments in respect of this document.

I would take a different view to the context set in this document. I would assert that if Medway is to be a leading waterfront university city, this cannot happen unless the universities are seen to participate actively in and contribute to the development of the Medway Towns.

I agree Medway has a stunning landscape setting and it has a unique natural, historic and industrial heritage. It is disappointing that the oft repeated “hasn’t achieved its potential” with weak economy and low skills mantra prevails. However, there is one overriding factor which I believe is the most important area, which Medway Council needs to transparently address:

The impact of climate change including air quality and proactively managing it, to create a healthy environment for people and businesses

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

- Developing a new road infrastructure which reduces 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, the new Thames crossing Option C, 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
- I prefer Scenario 4 as the option for developing housing with the proviso:
 - **Lodge Hill must not be built upon** because of its scientific interest designation
 - **High rise developments close to the river should be kept below 5 storeys** so that riverside and historic views are maintained especially from ground level

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.

Housing

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.

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; there should be close rail and/or bus links. Housing should be on one level but may be accessible above ground level by more than one lift/escalator.

The issue of **student housing needs to be addressed and quantified**. It should be recognised that any 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 to students should be specifically

licensed for this rental group. Existing buildings such as Mountbatten House in Chatham and at Chatham Waterside, should be considered as potential student housing.

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 some houses and providing a more uniform housing offer which will be easier to maintain. There **should be rent controls and a rigorous licensing of landlords and inspection** of sub-standard properties.

Employment and Education

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. An incentive, 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. Universities could become the centres of culture and learning and be more accessible to all people who live here e.g. through cinemas built near universities (similar to the Curzon cinema at Goldsmiths College) and public lecture facilities (as occurs in Canterbury).

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.

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 beyond
- the importance of Medway's industrial history to include connections to the River Medway, aviation history and military history.

Sustainable transport

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 Hoo Peninsula. There should be **properly developed cycle routes running through Chatham, Gillingham and Rochester High Streets**.

There should be an insistence on **electric vehicle charging points** on all new developments and these should be clearly identified as part of an overall sustainable transport strategy.

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 and Chatham should have this facility (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. **Consideration should be given to re-instating the old Bus Station in the Pentagon.**

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.

Retail and town centres

Chatham should be purposefully 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.

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.

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.

Natural Environment

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. **Clean air zones** should be established and roadside indicator boards used to indicate pollution levels and good motoring habits. **20 mph zones** should be established throughout the Medway Towns. **A congestion charging zone** should be established for through traffic, monitored through an Automatic Number Plate Recognition system.

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.

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.

Built Environment

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**.

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.

Health and Communities

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.

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.

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

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.

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

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.

Central Government

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.

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** who represents that (as well as other) area(s). **A development manager should be appointed** to oversee Chatham's rapid improvement.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Medway Council Local Plan
Issues and Options 2012-2035

Consultation Response

On behalf of
M J Osenton
Mill farm,
Ratcliffe Highway
Hoo St. Werburgh

Produced By:

BTF Partnership

Clockhouse Barn
Challock
Ashford
Kent TN25 4BJ

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Introduction

Context

BTF Partnership is a firm of Chartered Surveyors based in South East England providing a full range of rural and commercial property services to landowners.

We are making representations on behalf of M J Osenton, owner of land at Mill Farm as identified outlined in red on the plan within Appendix 1.

This document relates to a site specific submission in respect of three parcels of land to the north of the village of Hoo. Two parcels are located to the north of the Ratcliffe highway and immediately adjoining Four Wents roundabout, whilst a further larger parcel is adjacent to the northern western confines of the village of Hoo and close to the Hundreds of Hoo Comprehensive school.

BTF Partnership considers the land at Mill farm to be suitable, achievable and deliverable within 5 years **in line with the guidance in the Framework (para. 47) and in accordance with the findings of the Council's February 2017 SLAA.**

Site Submissions

Introduction

The site is formed of three parcels of land located to the north of the village of Hoo and forming part of Mill Farm, Ratcliffe, Hoo St Werburgh. All the land is down to pasture and grazed by stock. The land is of limited productivity and its size and productivity provides little alternative use.

BTF considers that the allocation of these three parcels of land would be consistent with all the options identified in the Development Options document. However, we consider that out of the 4 key Scenarios to help accommodate the challenging housing needs of Medway, Scenarios 1 & 2 would be unlikely to accommodate all the housing needs required for the plan period. We consider that these sites are sustainable, outside of the Green Belt and can provide a site attractive to small and medium size housebuilders and which can be brought forward quickly, to help meet both the overall plan target and the 5 year land supply.

Sustainability

Sustainability is considered a golden thread running through both plan-making and decision taking. At the heart of the NPPF, is a presumption in favour of sustainable development. The NPPF identifies that there are three dimensions to sustainable development: economic, social and environmental.

The following summary details the case for the Land at Mill Farm, Hoo, being a sustainable site for housing allocation under the three pillars of the NPPF:

Social

- ✓ Deliverable Housing Site – The site will make a valuable contribution to the five-year housing land supply of Medway. The expected increase in population of the Medway Towns to 330,000 people will require significantly increased housing levels over the course of the Plan period. Importantly, different types of housing are required to meet the needs of the varying demographics of Medway District and available at this site through. Furthermore, the site at Mill farm will seek to provide a supply of land to meet the needs for market and affordable housing for 29,463 homes over the plan period:
- ✓ Affordable Housing – The site can deliver a minimum of 20% affordable housing, addressing the significant shortage of affordable housing across Medway and providing achievable homes for future generations. We support the required percentage of 25% affordable housing on residential developments of over 15 units, however we consider that this threshold should be capable of being reviewed where viability is likely to be undermined.
- ✓ Provision of Market Housing – The development of the land at Mill Farm will enable the provision of high quality planned housing providing highly desired family housing to the area.
- ✓ Support of Local Services – The site is located within close proximity to The Hundreds of Hoo Comprehensive School, the Hoo Saint Werbergh Primary School and the Rochester Sports and

Social Club, as well as numerous other services including shops and local businesses. Provision of further housing in this location will maintain and increase Hoo's provision of services.

- ✓ Transport – The site is well located in terms of access to sustainable means of transport. The village of Hoo benefits from regularly served bus routes. In addition, the site is within walking and cycling distance from a wide array of services, abundantly capable of providing the necessary amenities for day-to-day life. The station of Strood is located a short distance to the west, and the international station of Ebbsfleet is approximately 12 miles to the west, providing links to London and the continent. The accessibility of the site ensures that there is not a reliance upon private transport modes and simultaneously encouraging healthier means of travel, such as walking and cycling.
- ✓ Access – The development of the site will enhance pedestrian and cycle access into the village of Hoo and create new connecting routes from the north of the village to schools and village community assets located within the west and centre of the village. The land is serviced by good existing road infrastructure.
- ✓ Public Open Space – The development of this site will deliver formal and informal public open space areas, benefitting both the new and the existing residents whilst contributing to the health and well-being of the community and enhancing the biodiversity of the area.

Economic

- ✓ Population Growth – The development of the land at Mill Farm will provide essential housing required to sustain the projected population boom over the course of the Local Plan. The provision of further housing and residents in Hoo will reinforce the viability of the village's numerous services.
- ✓ Jobs – The construction jobs created through the provision of housing at this site will benefit the local economy in the short term, whilst the increase in family housing and affordable housing will increase the number of working age people to support Medway's economy.
- ✓ Support of Local Services – The numerous other services including shops and local businesses stand to be supported and enhanced by the future residents of this site. Provision of further housing in this location will maintain and increase Hoo's provision of services.
- ✓ New Homes Bonus and Council Tax – Medway Council will stand to receive significant funds from the necessary s106 contributions and infrastructure contributions that this site would provide. Future residents of this site would also provide a significant council tax income to the local authority.

Environmental

- ✓ Ecological benefits – The site currently provides little ecological benefits due to it being regularly grazed as both livestock and equestrian grazing. It is therefore of limited ecological value and prevents habitats being created. The proposed development will include green corridors and ecologically enhanced areas which will establish greater biodiversity at the site.

- ✓ Biodiversity – The development proposals would enhance the biodiversity of the site, improving a currently restrictive site for nature.
- ✓ Vegetation – Development of the site will result in the provision of swathes of native hedgerow and tree planting to act as screening and encourage bird habitats.

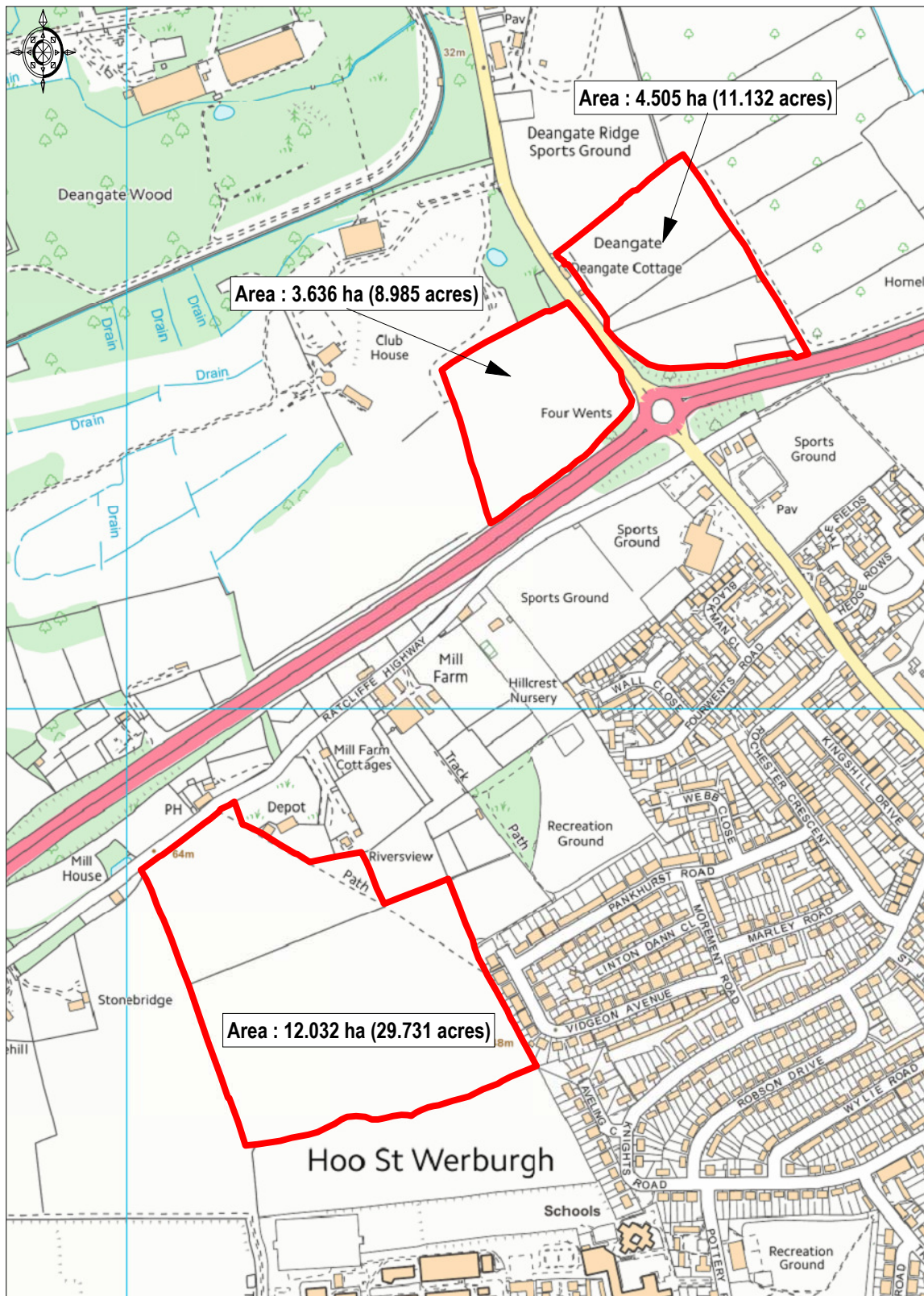
Deliverability

- The site is level, with good access to the Ratcliffe Highway and the Peninsula Way. The site is also well connected to services within the village of Hoo.
- The site is of little productive use in its current capacity and would be available for development immediately
- The site has been considered under The Medway Council Assessed SLAA Sites as part of the emerging Local Plan. The land to the south of the Ratcliffe highway has been included under the reference 1066, whilst the parcel to the north of the Ratcliffe Highway has been included under reference SO2.
- The land provides a natural infill solution, which will help ensure that Medway is able to produce a five-year housing **land supply which meets the needs of Medway's growing population over the** Local Plan period.

Conclusion

The land at Mill Farm, Hoo and as identified on the Plan within Appendix 1, presents a viable and sustainable opportunity to benefit the village of Hoo, and provide desperately needed housing for the growing population of Medway. We hope this response assists the Council and we would ask to be kept informed on progress with the Local Plan Development Options Consultation Document.

Appendix 1



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Your ref:
Our ref: 3947358v1

Planning Policy
Regeneration, Culture, Environment & Transformation
Medway Council
Gun Wharf
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Kent ME4 4TR

BY EMAIL ONLY: futuremedway@medway.gov.uk

18 April 2017

Dear Sir or Madam

MEDWAY LOCAL PLAN – DEVELOPMENT OPTIONS REGULATION 18 CONSULTATION

I am writing on behalf of our client National Grid and these representations are written in the context of their substantial landholding at the Isle of Grain. The site is owned by Thamesport Interchange Limited (TIL), which is wholly owned and managed by National Grid.

These representations follow our initial submission to the Council at the Issues and Options stage in February 2016.

The existing Medway Local Plan (2003) shows that the site is allocated for employment purposes and part of the landholding has planning permission (MC/09/1628) for:

“the development for up to 464,685 sqm of built employment space for (Use Classes B1(c), B2 and B8 – including open storage), and up to 245 sqm of floorspace for a business park management centre (Class B1(a) and retail unit(s) (Classes A1, A3 and A5), with associated infrastructure, landscaping, car parking and access.”

In addition, the first phase reserved matters for this site (MC/15/1051) was approved in July 2015.

The site was previously an old oil refinery and the rich industrial heritage has been continued with a number of nationally significant energy users on the site. Two examples include National Grid Grain LNG, which has the ability to provide up to 20% of the UK's forecast gas demand and the BritNed interconnector, which operates the electricity link between the UK and the Netherlands.

Our representations below are made with the above context in mind. I have set out representations in the same order of issues that are addressed in the Development Options document.

Paragraph 2.12

National Grid is fully supportive of the Council's aims to boost economic performance through supporting local businesses and attracting inward investment and targeting the creation of high skilled jobs.

Developing a Vision for 2035 (Page 15)

National Grid supports the Vision in providing Medway with a successfully growing economy, gaining competitiveness from its important strategic location and securing its diverse business base and attracting inward investment from a range of quality employment sites.

The entire TIL landholding is vital for Medway not just in terms of job provision but also in terms of its unique provision to support energy projects and energy providers. As a former oil refinery, the site has a rich industrial heritage and this needs to be recognised in terms of potential future employment land and nationally significant energy projects. These two major elements of employment and energy provision/generation need to work in tandem and be promoted throughout the course of the new Local Plan.

Delivering Sustainable Development – Paragraph 3.1

The plan suggests that there is a requirement for 49,943 sqm of B1 office space, 155,748 sqm of B2 industrial land and 164,263sqm of B8 warehousing land. Whilst these requirements are supported and the TIL land has the ability to help meet these targets, it should be noted that the market will ultimately decide what provision is required within the Borough. Whilst the employment designations are important, there is scope to meet energy and infrastructure needs at the Isle of Grain (which also bring new jobs) and both energy and employment should be promoted in equal measure at the TIL landholding.

Section 5 – Employment

Paragraph 5.3

It is helpful that ports, wharves and energy infrastructure are noted as having been built up around the river and estuary and that these are of strategic importance. The existing provision of energy infrastructure and potential for future needs should be carefully considered throughout the evolution of the Local Plan and it is important that this element is recognised as a vital strategic issue by Medway.

Paragraph 5.17

Paragraph 5.17 notes that there could be a surplus of employment land available in Medway due to large strategic sites on the Hoo peninsula. It is sensible to note that this supply does not necessarily align directly to business needs. There needs to be a combined approach to employment and energy uses given the unique qualities of the TIL land at the Isle of Grain. An innovative approach will ensure that this land is well used to meet employment and infrastructure needs both locally and nationally for many years to come.

Policy Approach – Economic Development (Page 47)

National Grid is supportive of Medway seeking to secure a range of jobs for its workforce. It is also noted that the Council will make provision for the scale, range, quality and locational requirements of its employment land, including the safeguarding of sites, identification of redevelopment and investment opportunities and allocations for new sites.

It is important that the TIL land at the Isle of Grain is protected and designated for future development. However, it is important that any future allocation for this site does not just focus on B2 and B8 uses. There are numerous nationally significant energy providers on the site and there is also huge potential for these types of uses to continue to be used and expanded on in this location.

The existing adopted Medway Local Plan (2003) specifically identifies the site for a wide range of uses including B1(c), B2 and B8 uses, special industrial uses and industrial uses not in a use class. We believe that this broad range of uses should be retained in the new Local Plan, to maintain flexibility on this regionally and nationally significant site.

This flexibility will ensure that the site reaches its full development potential in terms of industry, energy provision, employment space and creation of jobs in the local area.

Section 11 – Sustainable Transport

Transport and the River Medway

National Grid supports the council's acknowledgement that the River Medway has been used in the past as a key piece of infrastructure in the local area and whilst its use for manufacturing purposes has declined, Medway's waterways are still recognised as an important opportunity for commercial activities to benefit the local economy.

The acknowledgement in paragraph 11.12 that the "council will give careful consideration to the need to safeguard the capacity of port and wharves in Medway" is supported by National Grid.

Section 12 – Minerals, Waste and Energy

Paragraph 12.12

National Grid is pleased to note that Medway has recognised the areas input into power generation, electricity distribution and liquefied natural gas (LNG) storage.

Policy Approach: Energy – Page 109

National Grid strongly supports the policy approach to energy which confirms that, "proposals for additional new power generation and energy storage capacity on the Hoo Peninsula and the Isle of Grain will be supported where the following criteria is met:

- The impact on the natural environment, transport networks and local settlements being acceptable.
- Assessment of the feasibility and viability of potential re-use of waste heat.
- Specific efforts being applied to the recruitment and use of local labour, including collaboration with local universities and colleges..."

As mentioned above the TIL land at the Isle of Grain is of national significance and future opportunities for new power generation and energy storage should continue to be actively promoted in the Medway Local Plan.

Appendix 1A

This Plan does not show planning permission MC/09/1628 as referenced in the introduction to this letter. It is important to note that the principle of development has been established on the TIL land at the Isle of Grain and this should be reflected and annotated in brown (planning permission granted) on this plan.

Appendices 1B, 1C, 1D and 1E

In all of the above appendices the TIL land at the Isle of Grain is referred to as new/enhanced employment land. Whilst this is helpful and supported by National Grid (in line with the comments made in Section 12 of this document), it is vital that the existing and potential for new power generation and energy storage is also recognised on these visuals.

Conclusions

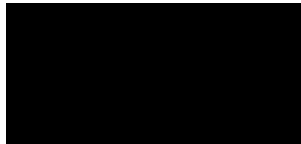
Overall, it is vital that the strategic importance of the TIL landholding at the Isle of Grain is recognised in the emerging Local Plan. The potential for employment generating, energy related uses and links to existing port related activities are extremely important to Medway from a strategic perspective and these uses need to be

protected and actively promoted in future versions of the Local plan to ensure that these opportunities are fully exploited.

I trust you find the above comments to be helpful at this stage. However, please do not hesitate to contact me should you wish to discuss further.

In the meantime, I would be grateful if you could continue to keep me informed of progress of the Local Plan.

Yours faithfully



Alister Henderson
Partner

