Gladman Development Ltd

Medway Council Local Plan

Development Options 2012-2035

May 2017

CONTENTS

EXECUTIVE SUMMARY

Context

i. Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Development's representation to the Medway Local Plan Development Options consultation.

ii. Gladman have been actively involved in the previous round of consultation into the draft Local Plan and look forward to continuing to work positively with the Council to aid the development of a sound plan.

Policy Options

iii. The representation contains our views on a wide range of issues which are discussed within the consultation document. The representation builds upon the comments we made at the Issues and Options stage of consultation, but with a focus on the various development options discussed in Section 3 of the consultation document.

iv. We also consider the proposed strategies for meeting the housing need within Medway, and some of the policy areas which are beginning to emerge. Given our interests our comments largely relate to how the plan can help Medway meets its housing needs.

1 INTRODUCTION

1.1 Context

1.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Developments' representations on the Medway Local Plan Development Options 2012-2035.

1.1.2 Through this submission Gladman will highlight a number of areas of support for the Councils proposed approach as well as highlighting some areas where further work may be required, in order to allow the Council to prepare a sound plan. Given the nature of our interest our comments relate largely to the ability of the plan to sustainably meet its full objectively assessed needs for housing (OAN) and the implications this has on the emerging policies and goals of the plan.

1.1.3 Even at this early stage of the plan making process it is imperative that the document is setting the foundations to meet the National Planning Policy Frameworks (NPPF) four tests for Local Plans to be considered sound:

- **Positively Prepared**
- **Justified**
- **Effective**
- **Consistent with National Policy**

2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework and Planning Practice Guidance

2.1.1 The National Planning Policy Framework has been with us now for over four years and the development industry has experience with its application and the fundamental changes it has brought about in relation to the way the planning system functions. The Framework sets out the Government's goal to 'significantly boost the supply of housing' and how this should be reflected through the preparation of Local Plans. In this regard it sets out specific guidance that local planning authorities must take into account when identifying and meeting their objectively assessed housing needs:

> ***"To boost significantly the supply of housing, local planning authorities should:***
>
> - ***Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area***
> - ***Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements…"***
> - ***Identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible for years 11-15"* (Paragraph 47)"**

2.1.2 The starting point of identifying objectively assessed housing needs is set out in paragraph 159 of the NPPF, which requires local planning authorities to prepare a Strategic Housing Market Assessment, working with neighbouring authorities where housing market areas cross administrative boundaries. It is clear from the Framework that the objective assessment of housing needs should take full account of up-to-date and relevant evidence about the economic and social characteristics and prospects of the area, with local planning authorities ensuring that their assessment of and strategies for housing and employment are integrated and take full account of relevant market and economic signals (paragraph 158).

2.1.3 Once a local authority has identified its objectively assessed needs for housing these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so (paragraph 14). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Adverse impacts on any of these dimensions should be avoided. Where adverse impacts are unavoidable, mitigation or compensatory measures may be appropriate (paragraph 152).

2.1.4 As the Council will be aware the Government published its final suite of Planning Practice Guidance (PPG) on the 6th March 2014, clarifying how specific elements of the Framework should be

interpreted when preparing their Local Plans. The PPG on the Housing and Economic Development Needs in particular provides a clear indication of how the Government expects the Framework to be taken into account when Councils are identifying their objectively assessed housing needs. Key points from this document include:

- Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need
- Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic underperformance, infrastructure or environmental constraints.
- Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply.
- Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience.
- Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.
- The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be.
- The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes.

2.2 Housing White Paper

2.2.1 The government published the housing white paper in February 2017, it is currently the subject of consultation until 2nd May 2017, and whilst it is clearly in draft form it represents a very clear direction of travel and clear indication of the government's intent. The Council will need to consider the emerging plan against the points raised within the plan, and monitor the progress of the White Paper. Given that the intention of the document is to have some of its changes come into force in November 2017, it is highly likely that a number of its measures will come into force prior to the adoption of the plan.

2.2.2 The title of the White Paper makes apparent that the government considers the housing market to be broken, it is also clear from the document forward by the Prime Minister that the cost of housing is a key part of why the housing market is considered broken.

> **"Today the average house costs almost eight times average earnings – an all-time record."**
>
> **"In total more than 2.2 million working households with below-average incomes spend a third or more of their disposable income on housing."**
>
> **"We need to build many more houses, of the type people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system." (Foreword from the Prime Minister)**

2.2.3 The second forward from the Secretary of State adds further to the governments thinking, particularly on the need to build new homes now, it states:-

> **"This country doesn't have enough homes. That's not a personal opinion or a political calculation. It's a simple statement of fact"**
>
> **"Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation."**
>
> **"That has to change. We need radical, lasting reform that will get more homes built right now and for many years to come."**

2.2.4 The White Paper outlines further potential reforms to the plan making process, OAN methodology, green belt consideration and housing delivery tests, amongst others. Gladman will point out key aspects from the White Paper in relevant sections of this representation.

2.2.5 Whilst the document is a White Paper the Council must give consideration to what it is saying, and how it outlines the need for reform and the need for change in the planning system. It is clear that not delivering the identified housing needs is not an option moving forward.

3 LEGAL COMPLIANCE

3.1 Duty to Cooperate

3.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

3.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration[1], as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard the Medway Local Plan must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

3.1.3 Medway sits in close proximity to a number of adjoining authorities within the south east, all of which are under significant pressure to deliver housing. Medway must ensure that ongoing and effective cooperation is undertaken with all districts. It is essential that these relationships are explored through the Duty to Cooperate and that any discussions are meaningful and lead to real outcomes in addressing the strategic issues identified.

3.1.4 One particularly important issue which Medway will need to factor into its ongoing Duty to Cooperate discussions will be consideration of the unmet housing needs of London, and as such cooperation and discussion with the Mayor of London. The Mayor is a prescribed body under the PPG[2] and as such will be an important consultee as the plan moves forward. Given that the levels of unmet need in London are currently at least 6,600 per annum[3] and could in reality be as high as 13,000 per annum, it is inevitable that some surrounding districts within the south east will be called upon to take pressure and housing growth from London. Given the strong links, identified by the Council, and the presence of key infrastructure, such as HS1, Medway could be a key location for accommodating such growth, and the plan through the Duty to Cooperate will need to explore these issues with the Mayor of London.

[1] PPG Reference ID. 9-011-2014036

[2] PPG Reference ID. 9-005-20150402

[3] Para 31 – Report on the examination in public into the further alterations to the London Plan

3.1.5 Further the PPG reflects on the public bodies which are subject to the duty to cooperate. It contains a list of the prescribed bodies. The PPG then goes on to state that:

> **"These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters."**

3.2 Sustainability Appraisal

3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.

3.2.2 An SA has been published for consideration during the period of consultation on the Development Options document. As noted above SA is an iterative process which should inform plan making and the delivery of development options. At this stage the SA published by the Council is labelled iterative and beyond testing the overall plan objective it does little to consider the relative merits of the various options proposed within the Development Options document. Gladman consider this to be an area in need of further work, a detailed SA of the various options for meeting the development needs will therefore need to be clearly undertaken at the next stage of the plan options.

4 OBJECTIVELY ASSESSED HOUSING NEED

4.1 Background

4.1.1 The process of undertaking an OAN is clearly set out in the Framework principally in §14, §47, §152 and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.

4.1.2 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying

> ***"the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:***
>
> - ***Meets household and population projections taking account of migration and demographic change;***
> - ***Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and***
> - ***Caters for housing demand and the scale of housing supply necessary to meet this demand."***

4.1.3 Key points that are worth noting from the above is that the objective assessment should identify the full need for housing **before** the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.

4.1.4 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in *Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes*

Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:

> ***"The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy's methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. […] The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, "[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies".***

4.1.5 Therefore following the exercise to identify the full, OAN for housing in an area,

> **"Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate." (NPPF §152)**

4.1.6 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.

4.1.7 The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above,

> **"Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:**
>
> - **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or**
> - **specific policies in this Framework indicate development should be restricted."**

4.1.8 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:

> **"sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion".**

4.1.9 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.

4.1.10 The National Planning Practice Guidance (NPPG) contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.

4.2 Objectively Assessed Need for Medway

4.2.1 The North Kent Strategic Housing and Economic Needs Assessment – Strategic Housing Market Assessments was published by the Council in late February 2016, and prepared by GVA in November 2015. Gladman responded to a separate consultation to the document in March 2016, in that response we set out a number of areas where the approach taken was considered to need further work.

4.2.2 On the 12th July 2016 the government published the 2014 based Household Projections for England, these projections form a key factor in the assessment of housing needs. The Council will need to clearly monitor the household projections, and any subsequent update of them as the plan develops.

5 MEDWAY DEVELOPMENT OPTIONS

5.1 Developing a vision for 2035

5.1.1 Gladman support the vision and strategic objectives outlined for Medway in the consultation document. It is clear that there is a need for substantial growth within Medway to meet needs over the period to 2035. The acknowledgement that some areas will see substantial change, and that development will be targeted to sustainable areas is supported. Given the scale of the need in Medway it is inevitable that there will need to be a substantial growth of many of the towns and settlements within the district.

5.1.2 Gladman are also supportive of the Councils acknowledgement of the impacts of London on the district, as we have referenced in the section on the Duty to Cooperate the plan will need to play close attention to the unmet housing needs of London as the plan develops, as well as giving consideration to how any travel to work patterns between Medway and London need to be accommodated.

5.1.3 The vision also clearly outlines the need for urban regeneration in many of the core towns within the Medway conurbation. The regeneration and redevelopment of brownfield sites should be an important and core part of the development strategy for Medway, however it is vital that any such development in regeneration areas is carefully considered. The Council will need to robustly evidence how much development in such areas is both viable and deliverable, it is possible that the delivery of development in some of the areas will move beyond the end of the plan period.

5.1.4 Given the context of the NPPF and the PPG, it is clear that the key aim from government is the delivery of sustainable development. This is in the context of both housing and economic development. The delivery therefore of the full OAN for Medway should be a key strategic issue for the plan to deal with. We note that the council currently states that it is the intention of the district to meet fully its OAN, Gladman support the council in its decision to proactively seek to meet its own needs.

5.2 Delivering Sustainable Development - Options

5.2.1 Gladman have reviewed in detail the various scenarios for meeting the housing needs of Medway as outlined in Section 3 of the consultation document. It is our belief that the best option for the Council in proceeding forward is Scenario 3: Hoo Peninsula focus.

5.2.2 As the Council outline in paragraph 3.3 of the consultation document the scale of growth in Medway is challenging. The current evidence the Council is using, to which Gladman consider may need revision, is that 29,463 homes are needed in the plan period. The plan confirms that much of the land in the development pipeline is part of regeneration programmes and is for the urban centres and waterfronts of Medway.

5.2.3 The plan also recognises that there is a need to identify further land in order to meet the development targets which have been arrived at. It goes further in 3.9 in stating that the full range

of development needs are unlikely to be met through regeneration areas and on brownfield land. Gladman agree with this statement, it will be important for the Council to strike a balance between including a reasonable estimation for the amount of brownfield land which can be developed and the inevitable need to release greenfield sites. Clearly development on brownfield land brings benefits, but it must be deliverable within the plan period, the Council will need to carefully consider and evidence the level of brownfield land it includes as plan supply.

5.2.4 It is also acknowledged that there are environmental designations to which regard will need to had if development is to come forward. Further designations, which may require development restraint, such as Green Belt are also present in Medway. However, Gladman are of the same view as the Council, in that these constraints do not mean that the overall development needs identified cannot be met, they will however influence policy choices in the locations for meeting those development needs.

5.2.5 The Councils first proposed development scenario is one which focuses on urban regeneration. Whilst Gladman can see why the Council would consider such an approach it is not considered that it would be a robust option moving forward as it would be fundamentally undeliverable. The option would require a considerable increase in development density, and a reliance on the delivery of flat and apartment accommodation. It would also need the Council to use considerable CPO powers to land assemble and redevelop large areas of brownfield land currently in employment use. Such an option would require considerable resource on behalf of the public sector with an uncertain market for the delivery of one type of housing in such huge quantities, in such a short period of time. Gladman acknowledge that urban regeneration will play a role in any final option for the plan to deliver its strategy, but a reliance on this level of brownfield land development is not considered realistic or deliverable.

5.2.6 Scenario 2 considers a suburban expansion based approach to meeting housing needs. This development option considers elements of Scenario 1, discussed above and elements of scenarios 3 and 4, discussed below. It involves releasing land around Strood, Rochester and Rainham to allow for expansion, it is acknowledged that there remains unknowns with regard to highway infrastructure and environmental impact, which may limit the level of residential development which can be delivered. It is also noted that this option will require substantial Green Belt release. Whilst some elements of this scenario are supported, notably a reduced reliance on regeneration sites and increased growth on the Hoo Peninsula, Gladman do not consider that the wider option has been shown to be able to deliver the required growth due to potential infrastructure constraints. As outlined in our response to Scenario 3, and in the accompanying Hoo development framework plan prepared by Barton Willmore, this is not the case with the potential to allocate significant development at Hoo. Furthermore, the development option would require the substantial release of Green Belt land, and as the Housing White Paper makes clear[4] this should in effect only be considered when all other options have been exhausted.

[4] Paragraph 1.39 – Fixing our broken housing market (DCLG)

5.2.7 Scenario 3 is the scenario which focuses development on the Hoo Peninsula. Gladman consider this to be the most realistic and deliverable of the scenarios outlined in the consultation document. It includes an element of urban regeneration, which is supported, and considered to be more realistic and deliverable in the scale outlined than some of the other options. In addition the option proposes to transform Hoo St Werburgh and Chattenden by expanding the settlements and providing a wider range of additional services. The new expanded settlement of Hoo St Werburgh would then further enhance the sustainability of the already sustainable other smaller settlements on the Hoo Peninsula such as Cliffe Woods and High Halstow which are capable of taking residential growth.

5.2.8 Whilst development of this scale will require considerations of such issues as environmental impact and infrastructure Gladman do not consider that there are any show stopping constraints, which would prevent the level of growth envisaged being delivered on the Hoo Peninsula. To consider these issues in detail Gladman, alongside a number of other land owners, have jointly commissioned Barton Willmore to look at these issues at a strategic level for the Hoo Peninsula. The detailed findings of Barton Willmore will be submitted to the Council in a separate joint response.

5.2.9 Development on the Hoo Peninsula in line with the aspirations of Scenario 3 will provide the framework for sustainable growth in a location which can ensure the delivery of the needed housing within the plan period. The option also allows for the regeneration of some core areas of the Medway conurbation, without an overreliance on the delivery of brownfield land or the loss of employment land in large quantities to provide housing. The option is therefore considered the most realistic and developable, without impinging on national designations such as Green Belt.

5.2.10 The final scenario considers a mix of urban regeneration, suburban expansion and rural town. Gladman have similar concerns with regard Scenario 4 as we do Scenarios 1 and 2. Namely the likely need for Green Belt release and the potential difficulty in delivering some of the urban regeneration sites, notably at high densities and possibly involving the relocation of employment land. The fundamental difference relates to the scale of growth apportioned to the smaller settlements on the Hoo Peninsula, Gladman contend that the scale of change in Hoo will further enhance the already sustainable locations of these settlements, and help provide a range of alternative sites in areas of strong market demand. This benefit cannot be derived with scenario 4, due to the further reliance on brownfield sites and Green Belt release.

Conclusion

5.2.11 It is therefore our conclusion that the most realistic and deliverable option will be one that includes the core principles outlined in Scenario 3. The growth of Hoo will allow for the coordinated delivery of major strategic development, which will allow for a large proportion of the needs of Medway over the plan period. The option also allows brownfield regeneration sites to contribute towards needs, without them being over relied upon, and allows for growth at smaller settlements around Medway. There is also no reason why this option could not allow for unconstrained sites, outside of the Green Belt, within the suburban expansion option to come forward as well to help meet the overall strategy needs. The variety of locations and the potential to allow a variety of site sizes, will

open up the residential market to all housebuilders, be they small, medium or large. Only through engaging all aspects of the industry with a wide range of sites will it be possible to meet Medway's needs.

5.3 Policy Approach: Housing Delivery

5.3.1 Gladman are supportive of the Councils acknowledgement of the scale of housing need in Medway, and the commitment of the Council to plan positively to deliver this housing. Gladman would however note that the Council will need to keep the figure under review particularly in light of any potential changes to the household projections which underpin the establishment of housing needs.

5.4 Policy Approach: Housing Mix, Affordable Housing and Starter Homes

5.4.1 Gladman support the Council in its proposed policy approach to take a flexible approach to housing mix on sites, which is influenced by the location of the site and its characteristics. Clearly a one size fits all approach is not appropriate for housing mix, and such an approach can have a negative impact on site delivery. Gladman would also note that in delivering a balanced housing mix there is a need for a corresponding balance of sites, in a range of locations. A development strategy which concentrates on urban regeneration could lead to a predominance of flats and apartments at the expense of other types of accommodation.

5.4.2 Gladman also support the Council in its approach to affordable housing and starter homes. It is vital that any policy is based on evidence that the required levels of affordable housing and starter homes will not negatively influence site delivery. The Council should also give consideration to the site types and locations put forward, sites in some locations may realistically be able to deliver higher levels of affordable housing. It is also possible that sites which do not need to provide major amounts of strategic infrastructure can also provide different levels of affordable housing. Given the need to provide over 17,000 affordable homes in the plan period these factors should be considered in selecting the final development options.

5.5 Policy Approach: Other Areas

5.5.1 The Development Options document touches on a wide range of other issues beyond housing, which will be important in shaping the future of Medway. At the present time Gladman consider that the approach taken by the Council with regard to landscape, heritage, design, flood risk and a number of other areas is reasonable, however it will depend on how the broad statements within the consultation document are taken forward before a proper assessment of them as 'sound' development plan policies can be taken.

5.5.2 At this stage Gladman would simply wish to point out to the Council that when using the policy approach in areas, such as those mentioned above, the Council will need to demonstrate a clear audit of how these policy approaches have potentially shaped the development options documents scenarios, in arriving at the final preferred option. Our broad assessment of these issues,

and how they shape our preferred scenario 3, are contained within the Barton Willmore submission on behalf of the consortium with interests in the Hoo Peninsula. It does not suggest that any of the issues outlined in sections 7, 8, 9 and 10 of the development options document would prevent the development as outlined in Scenario 3 from coming forward.

6 SITE SUBMISSIONS

6.1 Introduction

6.1.1 Gladman would like to promote the following sites for inclusion within the Medway Local Plan.

- Chattenden Lane, Chattenden
- Town Road, Cliffe Woods

6.1.2 We believe both of the sites are sustainable and capable of helping meet Medway's housing growth needs. Some sites have been previously submitted or considered by the Council within the SLAA, or are known to the Council through the submission of planning applications. Should the council wish any further information relating to any of the sites discussed below Gladman would be happy to discuss them in further detail.

6.2 Chattenden Lane, Chattenden

6.2.1 Gladman would like to promote land at Chattenden Lane, Chattenden for residential development. The site is considered in broader detail in the representation submitted by Barton Willmore on behalf of a consortium of developers working together to masterplan a wider vision for the Hoo Peninsula. In summary the key components of the Gladman scheme are:-

a. Circa 530 dwellings;

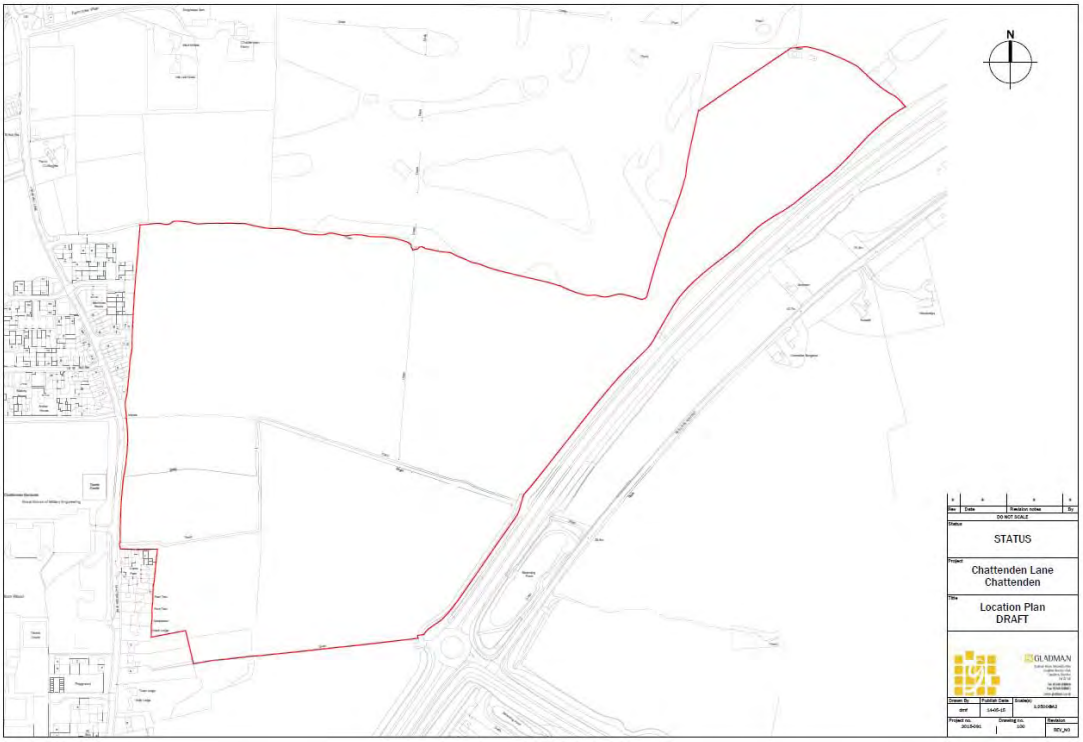
b. Land for a 2FE primary school;

c. Potential convenience store and family pub.

6.2.2 Gladman believe that the site is readily deliverable now, and could quickly come forward to help meet the known housing needs of the plan. Gladman do not consider that the development of the site is reliant upon the delivery of wider development on the Hoo Peninsula. The development would link well to the existing Chattenden built up area and the recently consented development to the south.

6.2.3 However, as previously discussed Gladman note that the site is part of a potential development to incorporate an expanded settlement on the Hoo Peninsula, and whist Gladman maintain that the development can come forward in and of its own right, we have engaged proactively with other landowners and Barton Willmore to demonstrate how the development would fit into large scale redevelopment on the Hoo Peninsula. Gladman are entirely committed to continuing to work with adjoining land owners and to engage further with the Council through the Local Plan process and any potential future planning application.

6.2.4 An indicative red edge for the land under Gladman control is shown below.


N
DO NOT SCALE
STATUS
Chattenden Lane
Chattenden
Location Plan
DRAFT
GLADMAN

6.3 Town Road, Cliffe Woods

6.3.1 Gladman would also like to promote land at Town Road, Cliffe Woods for residential development. The site is capable of delivering circa 225 dwellings (including 25% affordable housing) in a sustainable location, the site would be able to make a quick contribution to the 5 year land supply of the district.

6.3.2 The site has been the subject of a recent planning application which was refused by the Council for the following reasons:-

a. Cliffe Woods is not considered to be a sustainable location for a single use development of this scale and that there are insufficient employment facilities and services within the village or services in surrounding towns and villages accessible by sustainable transport modes.

b. The proposed development would have an adverse impact on the character and visual amenity of the area considered to be a 'valued landscape'.

6.3.3 Gladman note the Councils reasons for refusals, and believe that these issues can be overcome. There are no technical reasons for refusal. Gladman have appealed against the decision made by the Council and the Planning Inspectorate will consider the merits of the appeal in due course.

6.3.4 However, Gladman would wish to continue to work with the Council to address the reasons for refusal and to provide the Council with the appropriate further information to allow the Council to allocate the site for residential development. As we have noted in previous sections the Council, to its credit, has set out to meet the large scale need for housing to which the Local Plan must provide, as we have discussed in relation to the development scenarios outlined in the consultation document Gladman consider that there are limited options for the Council to sustainably and realistically meet their needs.

6.3.5 Whilst the large scale redevelopment of Hoo and Chattenden will be key to meeting development needs, as the plan itself recognises, sustainable settlements outside of the Green Belt, such as Cliffe Woods will need to take housing growth. This will be necessary for the plan to meet its development targets, as well as ensuring that the facilities and services within Cliffe Woods can be maintained. Importantly locations such as Cliffe Woods offer the opportunity to deliver sites which are different in market, size and scale than those in the urban area of Medway and in the proposed development location of Hoo and Chattenden. It is vital that as broad a supply and location of sites as possible is brought forward to compliment the large scale growth of Hoo in order to ensure plan targets are delivered. It is also important to note that all potential future development scenarios envisage growth at Cliffe Woods. Given the nature of the settlement there are only limited locations where such growth could be accommodated.


Cliffe Woods
GLADMAN
Town Road
Cliffe Woods
Legal
Red Line Plan
1:2500@A3
2016-019-001

7 CONCLUSIONS

7.1.1 Gladman have considered in depth the Council's Development Options document, and at this stage would support the Council in proactively seeking to delivery its OAN. The themes outlined by the Council are generally supported by Gladman particularly with relation to development Scenario 3, which we consider to be the most realistic and robust way of the Council delivering its development requirements.

7.1.2 Whilst we acknowledge that this is an early stage, given the iterative process that both plan preparation and SA should be, we would expect to see a more detailed SA document to help develop options. This may be a point the council wishes to consider before developing the plan further.

7.1.3 It is important that a balance of site types are included in the emerging plan and that the needs of rural settlements are not ignored. The housing requirement in Medway is challenging, but Gladman believe that with a development option which allows a range of sites in a range of locations to come forward the house building industry will be able to meet the challenge presented.

7.1.4 Gladman therefore believe that Medway should further develop Scenario 3 as the preferred option for Medway moving forward. This option offers the broadest range of deliverable locations for housing growth, without requiring incursion into the Green Belt. The option benefits from a range of potential development sites, with a large number of them with the backing of active house builders and or land promoters, who can successfully prepare planning applications and deliver development.

Gravesham Borough Council

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Plan Period and Growth Requirements

03 Both Medway Council and Gravesham Borough Council commissioned a Strategic Housing and Economic Needs Assessment (SHENA), which forms the basis of the growth requirements set out in the consultation document. We agree with the conclusions reached in the study (see Medway IGNA Technical Paper) that Medway should plan for at least some 29,500 dwellings covering the plan period 2012-2035. However, given the environmental and planning constraints within the housing market area i.e. Medway, Gravesham and Dartford, we believe that any excess capacity identified should be utilised towards meeting the need of the wider housing area.

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19 Gravesham Council welcomes the commitment to review the Green Belt in paragraph 7.17 and considers that meeting objectively assessed needs for housing and/or employment is an exceptional circumstance which justifies a review of Green Belt boundaries. A key component of progressing work on Gravesham's Site Allocations and Development Management Policies document, involves giving further consideration to the Green Belt within the Borough. Consequently, Gravesham Council would welcome continued discussions, through the duty to cooperate, regarding any Green Belt review and implications for both authorities including opportunities for joint working, especially as developers have promoted sites in the Green Belt to the west of Strood, including Chapter Farm, which straddles the local authorities' boundaries.

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10 April 2017

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GREATER**LONDON**AUTHORITY
Development, Enterprise and Environment

Catherine Smith
Planning Manager (Policy)
Medway Council
Gun Wharf, Dock Road
Chatham
Kent ME4 4TR

Date: 5 April 2017
Our ref: LP/JP20

Dear Ms Smith,

Development Options – Local Plan Consultation

Thank you for the opportunity to comment on your Local Plan Development Options consultation. This response builds on the response to your Issues and Options consultation submitted on 3 March 2016.

The approach to housing need set out in the Strategic Housing Market Assessment (SHMA) is welcomed, in particular the use of a long-term historic migration trend. The Council's approach to housing need set out in your Strategic Housing Market Assessment and the commitment to meet the identified need for market and affordable housing is supported. However, it would be useful to have further detail of the different Development Scenarios set out in Section 3 to understand how the number of new homes required will be achieved.

In terms of economic development perspective, it is clear that Medway benefits from established distribution routes; defined logistics and manufacturing locations; and proximity to the large markets in the Wider South East. We would like to explore with the Council further the opportunities to accommodate businesses seeking to relocate from London (paragraph 5.8 of the consultation document).

From a transport perspective the proposal to continue the engagement with the Mayor on strategic issues is appreciated. Paragraph 11.6 explicitly refers to joint infrastructure investment corridors to enable housing and other development beyond London and any potential future extensions to Crossrail 1. Stations on the North Kent and Chatham main rail lines connecting to the existing HS1 route at Ebbsfleet provide a potential focus for development. The Council may wish to consider in particular development options that maximise opportunities that arise from the capacity of the public transport network. Proposals for a Lower Thames Crossing are being developed by Highways England, which could also be strategically important for Medway and London.

The Thames Gateway Strategic Group and the Thames Gateway Commission provide opportunities to promote the benefits of development and investment across the Gateway.

If you would like to discuss the matters raised above further, please contact Jorn Peters [redacted]

[redacted]

Yours sincerely

[redacted]

John Lett
Strategic Planning Manager

cc: National Planning Casework Unit, DCLG
Lucinda Turner, TfL

GVA

An APLEONA company

Representations

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Birmingham
B1 2JB

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F: +44 (0)121 609 8314

Medway Council Local Plan 2012-2035 Development Options Consultation

Response to Questions on behalf of the Homes and Communities Agency

May 2017

Contents

Appendices

For and on behalf of GVA Grimley Limited

1. Introduction and Purpose

1.1 GVA is instructed by the Homes and Communities Agency (HCA) to formally respond to the Medway Local Plan Development Options (MLP DO) Consultation Document (January 2017) in relation to land owned by the Ministry of Defence (MoD) at Chattenden Barracks; Lodge Hill, on the Hoo Peninsula.

1.2 In November 2016 the Ministry of Defence published a document entitled "A Better Defence Estate" which identified 56 sites for disposal, including Lodge Hill. As part of its' delivery strategy, the Defence Infrastructure Organisation (DIO) has agreed in principle to transfer Lodge Hill to the HCA so that the site can be promoted for much needed new homes in line with Government policy on redeveloping surplus public land, reaffirming the declaration of redundancy first made by DIO in Spring 2008.

1.3 The HCA is an executive non-departmental public body, sponsored by the Department for Communities and Local Government (DCLG). It has also taken over responsibility from DIO for the planning promotion of the Lodge Hill site, including progressing the current call-in application through the inquiry process to determination by the Secretary of State and thereafter, disposing of the site for redevelopment.

1.4 The HCA is collaborating with the Greater Hoo Landowners Consortium ("GHLC") in relation to the promotion of the 'Greater Hoo' development option(s) through the Medway Local Plan process. The Hoo St Werburgh Development Framework Document (HDFD) representations have been submitted by GHLC and the HCA endorses these submissions. The Council will note that the HDFD has been prepared to show how the former barracks site and consortium land can be brought together in a coordinated and integrated fashion and that the consortium land and the Lodge Hill site can also be brought together independently of one another. It is considered that Development Option 4 (Urban Regeneration and a New Town) represents a balanced and sustainable approach to growth.

1.5 Section 2 of these representations describes the Lodge Hill site and locality. Section 3 provides relevant background to development of Lodge Hill and the HCA's involvement in supporting this strategically significant development. Section 4 provides the HCA's detailed responses to the Medway Local Plan Development Options (MLP DO) and provides comments on the accompanying evidence base documents, including the Sustainability Appraisal (March 2017) and Habitats Regulations Assessment (April 2017), where relevant.

1.6 The HCA are also making separate representations in support of the redevelopment of the Interface Lane and Jetty 7 sites in Medway District within the urban area of Medway. These representations are entirely separate to those contained in this submission.

[redacted]

[redacted]

[redacted]

2. The Lodge Hill Site and Environs

2.1 This section provides relevant background to development of Lodge Hill and the HCA's involvement in supporting this strategically significant development. The extent of the Lodge Hill site is delineated on the Location Plan provided at **Appendix 1.** This previously developed site comprises a gross area of approximately 329 hectares (813 acres).

Strategic Location

2.2 Lodge Hill is located in north Kent, within the Thames Gateway, on the Hoo Peninsula. It lies to the north of the urban areas of the Medway towns including (in closest proximity) Chatham and Rochester. It is broadly surrounded by the existing settlements of Hoo St Werburgh, High Halstow, Cliffe, Cliffe Woods and Wainscott, and is located off the A228 which connects the M2/A2 with the Hoo Peninsula and the Medway towns. The site falls within the administrative area of Medway Council. The nearest railway station is at Strood, approximately 3.3km (2 miles) from the site which is served by the 191 bus service. A railway line to the Isle of Grain bisects the peninsular passing near the villages of Cooling, High Halstow, Cliffe and Stoke, and is a freight-only service, as the passenger service closed in December 1961. This, at one time, served the Chattenden (Lodge Hill) defence site (see below). The nearest bus stops are situated adjacent to the site boundary on Chattenden Lane and Main Road, north east of the Four Elms roundabout.

Site Description

2.3 The site comprises four key areas. These are shown on the plan at **Appendix 2** and are as follows:

- **Lodge Hill Training Area** to the east of Lodge Hill Camp, which is accessed from the A228 via Lodge Hill Lane. It accommodates a range of predominantly external training facilities. Many of the original buildings, that were historically used for the manufacture of munitions have subsequently been demolished, leaving a hardstanding base and those that remain are generally in a relatively poor state of repair. This part of the site also included a railway training area and parts of the disused railway line are still visible. The 'naval tramway' was extended along the valley floor into the site, connecting to the mainline railway at Sharnal Street Tramway spurs providing access to brick magazines storing munitions;

- **Chattenden Barracks** lies immediately to the north of the village of Chattenden, and is accessed from the A228 via Chattenden Lane and Kitchener Road. Two parcels of land on the eastern side of the former barracks are now in residential use, the barracks complex

was largely demolished in 2005, leaving areas of hardstanding and previously developed land;

- **Chattenden Training Area** comprises a substantial tract of land located to the north of the A228, and lies to the west of Chattenden Lane, Lodge Hill Lane and to the east of Haven Street. This part of the site comprises a number of storage facilities and two redundant terraces of houses; and,

- **Lodge Hill Camp** lies some 1.5 km (0.9 miles) north of the A228 and is accessed from Lodge Hill Lane. It provided a range of facilities including a training school, an exhibition hall and a diver training facility.

3. Lodge Hill Background and Context

3.1 In this section, relevant national planning guidance is set out, in particular, guidance with a focus upon bringing forward public sector owned and/or brownfield land for housing. The role of the HCA is described, together with its planning strategy in relation to the site and the benefits arising from the development of Lodge Hill are highlighted.

National Policy Context

The Role of Public Land and Brownfield Land in Housing Delivery

3.2 Lodge Hill should be considered in light of the Housing White Paper (HWP) "Fixing our Broken Housing Market" (February 2017). This sets out how the Government intends to boost housing supply and, over the long term, create a more efficient housing market whose outcomes more closely match the needs and aspirations of all households and which supports wider economic prosperity. It is acknowledged that England needs to build between 225,000 to 275,000 or more homes per year, to keep up with population growth, and start to tackle years of under-supply. This is a significantly higher requirement than the average of 160,000 new homes being delivered each year since the 1970s in England, highlighting the importance of Medway Council planning to meet its required housing needs to 2035. In this regard, it is noted that the Council does not currently have a 5 year housing supply (it is between c.2.21 and 2.79 years[1]) and that adoption of an up to date local plan containing deliverable development options is critical, if this unsatisfactory position is to be remedied.

3.3 The HWP supports the need to redevelop brownfield land including the need to "*make as much use as possible of previously developed ('brownfield') land for homes*" (paragraph 1.24) and "*…the presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as high flood risk)*" (paragraph 1.25). In this light, optimising the development potential of Lodge Hill is strongly advocated by the HCA.

3.4 In a speech to the National House Building Council (NHBC) on 24 November 2016, the Communities and Local Government Secretary, Sajid Javid MP outlined what the government is doing to make the housing market work for everyone and acknowledged that the administration's track record was poor. "*This country has not built enough homes. We've got to be honest about it. In the last year of full records, we managed to deliver more than 170,000 additional properties across England. We need to do much better.*"

[1] Para 13 of local inquiry ref: APP/A2280/W/16/3143600, decision made on 6 March 2017.

3.5 He added: "*Everyone agrees we need to build more homes. But too many of us object to them being built next to us. We've got to change that attitude. So my message is very clear: it's time to get building*."

3.6 The political imperative attached to housing delivery could not be clearer. This is a top government priority and local planning authorities are mandated to deliver significantly more housing than has been the case. Medway Council is no exception bearing in mind it's significant housing shortage. The current NPPF (para 47) underlines this point; and potential revisions to the NPPF are likely to reinforce this requirement to speed up the scale and pace of housing delivery.

National Planning Policy Framework

3.7 National Planning Policy Framework (NPPF) paragraph 52 states that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements, as opportunities to achieve sustainable development. This is considered particularly relevant in the case of Lodge Hill and the "Greater Hoo" development scenario as described in Option 4 in the MLP DO.

3.8 A core planning principle of the NPPF is to encourage the effective land use by reusing land that has been previously developed (PDL) as defined by Annex 2 of the NPPF, provided that it is not of high environmental value (see NPPF paragraph 17). This principle is reiterated in NPPF paragraph 111. The NPPF also states that allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in the NPPF (paragraph 17), and this is further reflected in paragraph 110.

3.9 The NPPF reference to 'high environmental value' in relation to reuse of previously developed land must be read in the context of the NPPF as a whole. It is clear both from the NPPF core planning principles and paragraph 110 that this stipulation is itself caveated, subject to consistency with other policies in the NPPF. In particular it is reasonable to consider the weight to be attached to 'high environmental value' in the light of how it can be mitigated or compensated for, in line with advice in paragraph 118.

3.10 Having regard to paragraph 118 of the NPPF, the HCA's strategy is "*to avoid, mitigate and compensate*" for any adverse environmental effects that might result from the development. This is considered a critical element of the Lodge Hill proposals and is being progressed as part of a parallel workstream on the call-in application and potential fresh development proposals. In addition, Lodge Hill has been in military use for over 100 years and the site will need to be fully investigated and cleared of any contamination and remaining ordnance, in line with advice in the NPPF (paragraph 109).

3.11 Work to date has indicated that the site is seriously contaminated and contains potentially dangerous ordnance. It is plainly evident that a comprehensive programme of clearance and remediation is required to protect human health and safety, whatever the future use of the site. In the absence of development, the public sector will have to fund this work. This factor will have a bearing on the continuing environmental value of the site, given the extensive nature of the site investigations and remediation necessary. The matter of environmental value is one material consideration that will have to be evaluated alongside other important social and economic factors in determining where the planning balance lies in relation to redevelopment of the Lodge Hill site.

Role of the Homes and Communities Agency

3.12 The HWP highlights that the HCA will "*continue[s] to have a central role in delivering more homes across the country, but needs to do more to increase the scale and pace of house-building. To respond to the housing challenge, the HCA should do some things differently by* ***getting homes built directly on public sector land,*** *encouraging more competition and embracing partnerships, working innovatively with local and combined authorities, LEPs and other partners.*" (Paragraph 3.35). It is considered that the HCA has an important part to play in delivering homes on public sector land in Medway in line with this Government policy priority. In turn, the extent of, the former military land at Lodge Hill underlines the key role the site can play in delivering this step change in the pace and scale of housing growth in the district.

The HWP also notes that "*the HCA will be relaunched as Homes England with a clear, unifying purpose: 'To make a home within reach for everyone'. At the heart of this renewed purpose will be the ambition to get more homes for communities across all housing tenures, put in infrastructure to unlock housing capacity and attract small builders and new players to diversify the market on a sustainable basis*" (paragraph 3.36). The HCA has a fundamental role to play in delivering development and the required infrastructure at Lodge Hill, to support regeneration of the site consistent with government policy objectives.

The Planning History of Lodge Hill

3.13 The Lodge Hill site has a complicated planning history, including a resolution to approve by Medway Council on the (now) called in planning application in September 2014. This planning application provides for up to "*5,000 residential units, up to 36,750 sqm GEA of B1 business floorspace, up to 7,350 sqm GEA B2 business floorspace, up to 3,251 sqm GEA convenience retail floorspace A1, up to 2,070 sqm GEA comparison retail floorspace A1, A2, A3, A4, A5, secondary school, 3 primary schools, community facility, healthcare facility, assisted living facility, nursing home, garden centre, two hotels, water bodies and associated infrastructure*

works including access, roads, informal and formal open space, pedestrian, cyclist and public transport infrastructure, utilities, car and cycle parking" (Ref. MC/11/2516). Key milestones in the site's planning history are summarised in the table below.

Date	Activity
2003	The new settlement concept at Lodge Hill emerged from the Thames Gateway Growth Area designation.
Spring 2008	Defence Infrastructure Organisation (DIO) confirm Lodge Hill site surplus to requirements.
2008	Land Securities (LS) appointed as Land Sale Delivery Partner (LSDP).
2008-2011	LS draw up Lodge Hill development scheme.
September 2011	LS/CBRE submit Outline Planning Application, on behalf of DIO, to Medway Council (Ref MC/11/2516).
June 2012, January 2013 and May 2013	Examination of Medway Core Strategy (Jan 2012).
19 November 2013	Chattenden Woods SSSI enlarged to include majority of application site and notified as Chattenden Woods and Lodge Hill SSSI.
25 November 2013	Medway Core Strategy withdrawn following Inspector's report and SSSI extension.
February 2014	Updated ("Replacement") planning application submitted.
4 September 2014	Medway Special Planning Committee resolved to approve the application subject to referral to the Secretary of State as a departure.
February 2015	Secretary of State called-in the application for his own determination.
June 2015	LSDP contract expired and LS withdraw from contract as delivery partner.
July 2015	New technical team appointed.
August 2015 – May 2017	On-going technical surveys/analysis and consultation to support the called-in application and any potential fresh proposals for the site.
Expected 2017	Formal transfer of Lodge Hill site to HCA from the DIO.

Source: GVA

Call-in planning application

3.14 Medway Council resolved to grant outline planning permission for this scheme on 4 September 2014, but it was necessary to refer the application to the Secretary of State as it was not wholly in accordance with the adopted Local Plan and there were outstanding objections from Natural England and Sport England. The Secretary of State called the application in for his own determination on 13 February 2015. Attached at **Appendix 3** is the Replacement Indicative Masterplan" relating to the called-in application.

3.15 The application will be determined by the Secretary of State following a public inquiry. The programme for the Inquiry is provided at **Appendix 4**, which requires the applicant's submission of the Statement of Case on 19 December 2017, with the inquiry programmed to commence on 20 March 2018.

3.16 It was originally envisaged that the inquiry would be held in late 2016, but the programme has been delayed due to the need to undertake, and consult upon, further ecological surveys (as formally requested by the Planning Inspectorate, through Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, requiring Further Environmental Information to the submitted Environmental Statement). These surveys are progressing and the HCA's project team is evaluating the outcomes to assess how the new data may influence the called-in application and any new proposals.

3.17 In addition to progressing the material needed to inform the call-in process, the HCA is committed to securing an allocation in respect of Lodge Hill in the emerging Medway Local Plan. The third component of its strategy is to potentially submit a fresh planning application the content of which will be shaped by the recent survey work. Technical analysis of these proposals is proceeding in parallel with work to support a local plan allocation and a decision will be made on this submission later in 2017/ early 2018.

HCA Strategy and programme

3.18 The HCA's overall objective is to optimise the development potential of Lodge Hill and support the delivery of up to 3,000 dwellings with ancillary land uses and associated infrastructure in the plan period to 2035. The current timeline highlights key dates in relation to potential commencement of residential development on Lodge Hill, which suggests a development commencement date could occur before 2025, possibly as early as the monitoring year 2022-2023. This approach would be consistent with the HCA's 'accelerated delivery' programme aimed at increasing the pace and scale of housing delivery, targeted at areas such as Medway.

Benefits of the Lodge Hill Scheme

3.19 Bringing forward residential led development at Lodge Hill will result in the following significant benefits that should not be underestimated in the context of the emerging local plan including:

- Providing 3,000 houses in Medway over the plan period including 10% of Medway's overall housing need over the plan period (29,463 dwellings) and a significant amount (26%) of the remaining housing shortfall (11,257) making a substantial contribution to Medway's Housing needs, with scope for additional provision beyond the plan period;

- The affordable housing contribution will potentially contribute over 25% (circa 750 units) of this remaining requirement in the plan period to 2035, a substantial contribution towards addressing housing need;

- Significantly improving the economic wellbeing of the Hoo Peninsular, including new employment development;
- Provision of important new leisure and recreational facilities ("social infrastructure"), including access to open space previously inaccessible to the public;
- Protection, as far as practicable, of the ecological assets on the site, and where losses occur, comprehensive mitigation and compensation measures will be put forward;
- Protection and enhancement of the ancient monument and listed buildings within the site;
- Clearance, remediation and redevelopment of a previously developed, publically owned site which will provide a significant housing contribution to meet Medway's needs;
- Significant physical infrastructure improvements including enhancement of existing roads and provision of a road network throughout the site;
- Providing a solution to address any potential threats to human health and safety through site remediation and, critically, the removal of any dangerous ordnance that is present within the site; and,
- The key role of Lodge Hill in enabling the early delivery of houses and infrastructure as an integral part of the Greater Hoo Development Option no 4.

3.20 In addition, if Lodge Hill were to remain undeveloped there would be a significant downside associated with this prospect, namely:

- An outcome resulting in the need to identify an alternative development proposition to replace Lodge Hill, which would not involve previously developed and/or public sector land;
- The site would continue to provide a significant danger to human health and safety by reason of potential contamination and the presence of unexploded ordnance which would significantly constrain effective environmental management; and,
- The need to identify an alternative (and viable) use for a significant public sector asset, in the light of very costly site remediation and environmental management measures.

The Relationship between Lodge Hill and the Greater Hoo Development Option

3.21 Alongside these representations, the Greater Hoo Landowners Consortium (GHLC) has submitted overarching representations which include a framework masterplan incorporating the proposed development at Lodge Hill. The HCA has the following observations upon these submissions:-

- The HCA supports the broad principles and approach taken by the GHLC.
- The concept plan demonstrates how the Greater Hoo development option would work in a cohesive and comprehensive manner incorporating the Lodge Hill site.
- Lodge Hill and the Consortium land can be brought together in a coordinated and integrated fashion.
- Creation of a carefully considered and funded Infrastructure Delivery Plan will lie at the heart of delivery of the Greater Hoo option, if this is to assist in meeting Medway's Objectively Assessed Housing Needs.
- The HCA would encourage wider discussions with Medway Council and other stakeholders focused upon means by which the scale and pace of delivery of housing can be increased in Greater Hoo and Medway as a whole over the plan period up to 2035.

4. Responses to Consultation Questions

4.1 This section provides the HCA's responses to the questions posed in the Council's online consultation questionnaire.

Q1: Do you agree or disagree with the draft vision for Medway in 2035?

4.2 The HCA welcomes the vision as proposed but would submit the comments provided below. It is particularly welcomed that the Council acknowledges the important contribution that new development will make to realising this vision. The HCA supports the reference to planned growth in the fourth paragraph and encourages the Council to insert the following text "*Planned growth* ***that meet's objectively assessed development and infrastructure requirements in Medway, will have delivered development in which its residents have pride***" to underline that the plan has been positively prepared in relation to meeting its development needs and delivering development in the plan period as required by para 182 of the NPPF. The growth targets quantified through the Strategic Housing and Economic Needs Assessment (SHENA) study are ambitious, particularly in relation to housing need, and the Local Plan must plan to deliver to meet its own needs during the plan period given Medway's population is set to increase by 53,708 people to 330,200 by 2035. The final paragraph of the vision states that development will "*ensure that important wildlife… assets are protected and opportunities to enhance their condition and connectivity.*" The HCA considers that this should be amplified for consistency with NPPF paragraph 118 to acknowledge the potential for a development "***to provide significant benefits by way of mitigation or compensation.***"

4.3 In addition, the vision could be further enhanced by elevating the supporting text in paragraph 2.8 in relation to the benefits a development can deliver, in particular the potential to "***turn derelict and underused land [such as Lodge Hill] into attractive modern places to live… and achieve the city scale facilities that Medway warrants***." Similarly the supporting text at paragraph 2.32, where it is stated that regeneration is at the core of Medway's growth plans could be inserted in the vision to reflect the emerging development options. Given the national policy support for reusing previously developed land and seeking to maximise the contribution from brownfield and/or public surplus land, the vision could be brought more closely in alignment with national government policy. Lodge Hill would provide circa 3,000 dwellings within the plan period to 2035, which equates to approximately 10% of the proposed Objectively Assessed Housing Need for Medway of 29,463 dwellings. It is considered appropriate that the vision makes specific reference to the key role that strategic brownfield sites and public sector land (including Lodge Hill) can play in helping to deliver this vision.

4.4 It is considered appropriate to widen the reference in the third paragraph of the Vision to refer to new development in "***Medway***" as a whole, not just "***in its towns and villages***" as the

significant developments proposed in the emerging options could also include allocations adjacent to, or outside, the existing urban areas.

4.5 The second paragraph of the Vision could be more specific in outlining of what "*the river will be… the defining feature*", presumably "*of Medway"*?

4.6 Subject to the above comments, the HCA welcomes the vision and statement and supports the comment in the second paragraph, that Medway will secure "*high quality development to strengthen the areas distinctive character*" (Para 2) and that "*Medway will have… accrued benefits from wider strategic developments*" (Para 3). Lodge Hill will provide substantial benefits in line with these ambitions as highlighted in Section 3 of these representations.

Q2: Do you agree or disagree with the strategic objectives in Section 2 of the draft Local Plan?

4.7 The HCA agrees in principle with the objectives proposed subject to the following comments:

4.8 The HCA particularly supports the objective to "make the best use of brownfield land" and suggest adding "***particularly public land where derelict or underused***" to ensure consistency with national policy and the Housing White Paper.

4.9 The HCA suggests a new objective is added under the existing sub-heading "Ambitious in attracting investment and successful in place-making" namely that seeks "**To ensure Medway maintains a safe and secure environment and seeks new development that minimises risk to human well-being.**" This would tie in to the emerging design policy to "create a safe environment". This is considered important to ensure that Medway requires new developments to provide a safe environment, mindful of previously developed sites with contamination issues. The Council should use new development to positively promote public safety and ensure development, on such sites, are fully cleared of contamination and significant hazards, including ordnance, prior to public access. The NPPF also emphasises that where a site is affected by contamination, responsibility for securing a safe development rests with the developer and/or landowner (paragraph 120). It is considered appropriate that this issue is incorporated by way of a new objective in the new local plan.

4.10 The HCA welcomes the objectives "To *provide for the housing needs of Medway's communities meeting the range of size, 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.*" These are important aspects of the emerging local plan and are central to the preparation of a positively prepared plan that can accommodate the scale of housing growth necessary. They are also consistent with national policy.

Q3: The Council wants to hear your views on where this development should take place so that Medway grows sustainably. We welcome your comments on how different locations and types of development could contribute to successful growth, and where there may be potential issues to address? Please explain why you have ranked the options in this order?

4.11 The HCA **supports** Scenario 4 as providing Medway Council with a sound approach which would provide the optimum opportunity to boost the delivery of sufficient housing in Medway to address potential risks in housing delivery. Comments on the various scenarios are provided below. A general observation is that the options should be more carefully described to ensure consistency in terms of both development descriptions and related infrastructure requirements such that the Infrastructure Delivery Plan can be related more closely to the type / scale of development proposed.

4.12 As a point of clarity, the HCA notes that the scenario maps provided alongside the consultation documents contain supporting text, which provide an indication of the expected quantum of housing development in each option. Whilst this information is not provided in the "Full Development Options Consultation Document", the HCA have referred to these emerging numbers in the responses below.

Q4: Option 1 - Maximising the potential of urban regeneration

Please explain which aspects of this potential development that you support/ do not support?

4.13 Elements of this option are welcomed by the HCA (e.g. urban regeneration) but in the Agency's view there are significant risks inherent in this option.

4.14 The approach suggests that some 10,500 units could be delivered through the redevelopment of sites including Medway City Estate, Chatham Docks and waterfront sites in Chatham and Strood. It is unclear from the Development Options exactly how many of the 10,500 units proposed are realistically deliverable in the plan period and would come forward through intensification of sites that already benefit from planning permission and how many would come forward on entirely new sites, not currently being promoted for development. It is acknowledged that the urban regeneration sites often present significant challenges to develop given the nature of these sites, fragmented ownerships, technical constraints including contamination, flood risk and inadequate highways and infrastructure capacity. Character of the urban area, proposed mix of uses, building heights and impact on the historic environment are all key issues that could realistically affect the viability, deliverability, capacity and ability to deliver the scale of growth required in the plan period to 2035.

4.15 The viability of affordable housing can also be significantly compromised on challenging brownfield sites which could further undermine the ability to contribute towards affordable housing needs.

4.16 These significant risks, identified in paragraph 3.26 of the MLP DO, include the "*ability to delivery over the plan period, potential loss of overall employment land supply, viability of tall buildings and difficulties in providing the full range of houses that the market requires.*" This approach cannot be justified as the most appropriate strategy because of difficulties inherent in increasing the overall rates of housing delivery and building at higher densities than has historically been the case in Medway. These issues raise real concerns over the ability of this option to improve the pace and scale of housing delivery in Medway and the HCA consider these issues should be given appropriate weight in the Sustainability Appraisal scoring (see paragraph 4.44 below).

4.17 Another issue is the type of housing likely to come forward in this option. As admitted by the Council this would "*deliver much of the housing in apartments*" (para 3.25) given the more limited land availability; this approach may not therefore meet the full housing needs of existing and future Medway residents and result in an unbalanced provision of housing. The most common reason for accommodation not meeting respondents' needs as articulated in the District's Housing Needs Survey (2015) was that "*properties were too small*" (i.e. more family housing is needed) which is likely to be more challenging to address in a 'high density urban regeneration' strategy.

4.18 The HCA supports the general principles of urban regeneration, set out in the MLP DO, namely that "*vacant or underused brownfield sites that are suitable for sustainable development should be considered preferable to building on greenfield sites*" (para 3.19) and (there is) "*the potential to increase the rate of development in these areas*" (para 3.21). This approach is considered reasonable as part of a wider strategy, but, in itself, will not deliver the significantly increased scale or pace of housing delivery desperately needed in Medway.

4.19 In order to ensure that the plan is robust, assumptions on capacities of urban regenerations sites should be realistic. It is considered that 10,500 units on urban regeneration sites will not be deliverable in its entirety within the plan period. A more realistic approach in Appendix 1E suggests that the regeneration sites could accommodate circa 6,500 units which is considered a more realistic quantum, including Chatham Docks, Medway City Estate, Chatham and Strood Waterfront.

4.20 The HCA notes that whilst the strategic diagram 1B clearly shows Lodge Hill as a potential area for mixed use development, the policy wording alongside this plan does not reflect this position and should be amended.

Q5: Option 2 - Suburban Expansion

Please explain which aspects of this potential development that you support/ do not support?

4.21 This option is not supported by the HCA for the following reasons.

4.22 In terms of deliverability, it is possible that Option 2 will perform more effectively than Option 1. That said it is noted that Option 2 assumes development on Green Belt land which may not be necessary to the extent proposed if one of the other options is selected. This is an important test given NPPF policy on Green Belt and reaffirmation of this policy in the Housing White Paper. It will be necessary to demonstrate 'exceptional circumstances' to support Green Belt release which may be challenging to prove if alternative (non Green Belt) options exist.

4.23 The HCA notes the constraints on this option articulated by the Council which include "*limited capacity for suburban expansion*" (para 3.31) and the potential for "*requiring new transport schemes that cannot be supported on environmental or viability grounds*" (para 3.29). The effectiveness and deliverability of this scenario is therefore questioned by the HCA.

4.24 Consideration needs to be given to infrastructure planning and the constraints present within the natural environment to determine the capacity of these areas to accommodate growth. The DO highlights that highways capacity is likely to be an issues in these areas which will have significant implications for the viability and deliverability of development in these locations.

4.25 This option would deliver 3,000 homes at Lodge Hill within the plan period which the HCA considers appropriate. It is noted that this option would provide a further circa. 2,000 homes for the expansion of Hoo St Werburgh, which may not be of sufficient critical mass to ensure a 'sustainable' development and to deliver an appropriate level of infrastructure to secure a comprehensive and viable housing proposal to meet Medway's needs.

Q6: Option 3 - A rural focus

Please explain which aspects of this potential development that you support/ do not support?

4.26 In the HCA's view this option has merits, given its acknowledgement of the potential for a new settlement on the Hoo Peninsular.

4.27 However, given the scale of growth proposed on the Hoo Peninsular in this option, it is necessary to consider the geographical balance of future development in Medway. This option would deliver approximately 12,100 homes on the Hoo Peninsular. Whilst this option would secure 3,000 homes at Lodge Hill and 6,500 for the Hoo Rural Town, it would also require 2,600 homes to be accommodated through the expansion of the existing villages. Hence this option would result in a significant proportion of Medway's unmet housing needs being

delivered on the Hoo Peninsular, which appears unbalanced in relation to the wider distribution of development across the Borough and raises important questions around the sustainability of this approach. The option would, however, deliver 3,000 homes at Lodge Hill to 2035, which the HCA supports.

4.28 It is noted that, in certain circumstances, the NPPF (Para 52) supports the promotion of new settlements and this is repeated in the HWP (page 21). An option that includes the development of a "sustainable rural town" is considered an appropriate strategy for further consideration in Medway.

4.29 The expansion of Hoo St Werburgh provides an opportunity to deliver a sustainable settlement delivering a mix of uses, including retail, and employment alongside housing, and properly serviced by infrastructure. The infrastructure serving Hoo St Werburgh has the capacity to accommodate growth, or the potential for improvement. This contrasts to the suburban areas which have only limited potential for improvement.

4.30 It is essential that the IDP addresses the wider issue of infrastructure delivery, including phasing and funding, to ensure that this option (and the other three) are deliverable and would not render key development sites unviable or unable to come forward.

4.31 The approach taken to Lodge Hill in para 3.39 is commented on fully below. The proposal for Lodge Hill as part of a planned new settlement is welcomed by the HCA. The need for the site to be considered "*in context of coordination with a wider development around Hoo St Werburgh*" (para 3.39) is also supported by the HCA. In this regard, the HCA is collaborating with the Greater Hoo Landowners Consortium to provide a cohesive response to this proposal in the form of the separate representations made by GHLC (see the Hoo DFD representation) to the local plan options.

Q7: Option 4 - Urban regeneration and rural town

Please explain which aspects of this potential development that you support/ do not support?

4.32 This option would deliver the highest overall housing growth at 18,650 homes, and appears the most sustainable and balanced option. For these reasons it is **supported by the HCA** and is the Agency's preferred option.

4.33 Given the scale of unmet housing need in Medway, the HCA supports this scenario over the other three scenarios, as it is considered prudent to opt for the highest growth option that also minimises potential concerns over delivery. It is considered that Scenario 4 would give Medway Council the best opportunity to create a positively prepared plan; to meet its significant housing needs within the plan period and to provide a range of solutions to the

unmet housing need, thereby reducing delivery risks. These solutions would be based on a suitably balanced and flexible approach, including building at higher densities in urban regeneration proposals, development at Lodge Hill and a new rural town at Hoo St Werburgh. The diversity of these proposals will help ensure delivery.

4.34 The HCA notes the approach (at para 3.42) that "*the Green Belt land to the west of Strood is not released.*" This approach is considered justifiable in light of national policy as there would appear to be reasonable alternative development options that should be favoured in the local plan ahead of Green Belt land release, which should be protected if possible.

4.35 In summary, Scenario 4 brings together several important development strands found in other options; this approach will maximise delivery potential over a range of development sites which will help to facilitate the HCA's objective of increasing the pace and scale of housing delivery, including the development of Hoo St Werburgh into a small rural town as well as development at Lodge Hill and some growth at the villages. This option is the HCA's preferred scenario and, importantly, would also deliver some 3,000 homes at Lodge Hill over the plan period to 2035. It is considered a balanced and sustainable approach to growth.

Q8: Option 5 - Alternative sustainable development option

Please provide comments below?

4.36 The HCA's preferred approach is option 4 and the Agency does not wish to put forward any alternative development options.

Additional comments in relation to Lodge Hill in the context of the HCA's responses to Questions 1-8 above

4.37 The HCA welcomes the Council's support for the development of Lodge Hill at paragraph 3.39 as "*a planned new settlement, delivering a balance of homes, infrastructure, jobs, services and open spaces on a redundant military site on the Hoo Peninsula.*" The vision for Lodge Hill outlined in the called-in application echoes these principles as described in the paragraph below:

"*Lodge Hill will be a sustainable and integrated community, capitalising on its exceptional setting, complementing and supporting nearby settlements and the Hoo Peninsula as a whole. It will be a distinctive place that connects to the surrounding rich countryside, with a land use pattern that minimises the need to travel. It will be an exemplar for the Thames Gateway in the way that it minimises its impact on the environment and provides for an excellent quality of life for all its residents. It will also become an important focus for higher value economic activities, taking advantage of its location between urban Medway and the*

existing and emerging industries at Grain and Kingsnorth. It will be a resilient place that is capable of adapting to environmental, social and other changes over the long term" (para 2.31).

4.38 This vision is entirely compatible with the emerging (wider) vision set out in the submissions of the GHLC on the Greater Hoo development option. In this context, Lodge Hill would form an integral part of a comprehensive and sustainable new (and expanded) settlement, making full and effective use of surplus, brownfield, publicly owned land. Concerns in relation to environmental impacts will be addressed fully through a well considered compensation and mitigation strategy, in line with advice in the NPPF (para 176).

4.39 The Council also comments at paragraph 3.39 that "*the planning status of land at Lodge Hill is uncertain, and dependent upon the outcome of a Public Inquiry scheduled for Spring 2018. In preparing this stage of the Local Plan, the Council is considering the inclusion of Lodge Hill as an option that could contribute to the development needed over the plan period. However to address risk, development is phased in the second half of the plan period, after 2025, to allow consideration of the outcome of the Public Inquiry and to plan for alternative sources of land supply if required in the Local Plan. It is considered in context of coordination with a wider development around Hoo St Werburgh.*" The HCA acknowledges the position with respect to the Call-In Inquiry, and the need for Medway Council to address development delivery risk in the emerging Local Plan. However, given the potential priority attached to housing delivery and the scale of housing need in Medway, the HCA consider that the MLP should incorporate greater flexibility to enable Lodge Hill to come forward at an earlier stage if appropriate (subject to the outcome of the Public Inquiry and/or determination of any further planning application), as it is possible that Lodge Hill could contribute to the delivery of housing prior to 2025.

4.40 The following timeline highlights key dates in relation to potential commencement of residential development on Lodge Hill, which suggests that a start date could occur as early as the monitoring year 2022-2023 which would align with the HCA's accelerated housing delivery programme approach:

- Outline planning permission granted Q1/Q2 2019 based on a determination following a Public Inquiry or new application;
- First reserved matters approved (and discharging of any pre-commencement conditions) Q1 2020;
- Enabling works including site clearance of any unexploded ordnance and ensuring the provision of supporting infrastructure would commence immediately following grant of planning permission. A reasonable start date for commencement of development could

be as early as 2021/22 (in line with 2 years of commencement outlined in the Housing White Paper) with commencement of dwellings falling in the monitoring year 2022 – 2023, which would give circa 2 years from approval of the first reserved matters application. The HCA invites the Council to incorporate greater flexibility in the start date for development at Lodge Hill, especially as specific (less constrained) parts of the site could come forward in an earlier phase of development with HCA support, and acknowledging the approach advocated in the Housing White Paper to speed up the delivery of housing.

4.41 In summary, the HCA requests that Medway Council reflects the following comments in the emerging Local Plan:

I. The HCA requests greater flexibility in the commencement date for residential development at Lodge Hill prior to 2025 (i.e. as early as 2022/23), and requests the Council to acknowledge this point in the emerging Local Plan.

II. Lodge Hill should be included as a specific allocation in the emerging Medway Local Plan and the HCA requests the Council to reference the potential for "circa 3,000 dwellings and associated uses and infrastructure to be developed at Lodge Hill in the plan period to 2035".

III. The HCA requests that the emerging plan recognises the potential to bring forward additional homes at Lodge Hill, in the subsequent plan period post 2035.

IV. The Lodge Hill site forms an integral component of the Greater Hoo Development Option (4), and could come forward in an early phase as a discrete site without prejudicing the implementation of the wider, more comprehensive, Greater Hoo development scenario outlined in the Medway Local Plan Development Options document.

Sustainability Appraisal

4.42 A number of comments are made in this section in relation to the Sustainability Appraisal (published in March 2017) as it relates to the scenarios included within the emerging local plan. It is acknowledged that this document is yet to be fully informed by the completed evidence base and note its interim nature.

Lodge Hill

4.43 The approach towards meeting development need is set out and the considerable shortfall in identified sites to meet the scale of development needs for c.29,500 homes highlighted. It is in the context of the substantial housing need that the Council has considered inclusion of land at Lodge Hill. In addition, its inclusion reflects the extent of previously developed land on the

potential development site and the Council's view that a satisfactory compensation and development mitigation package could be implemented. The Council acknowledges that the Secretary of State may not support the development of the site due to its environmental assets and therefore there is no planning certainty for Lodge Hill at present.

4.44 The HCA supports Lodge Hill being included in all development options and has outlined the potential delivery programme (above). The HCA notes that the SA makes specific reference to the quantum of development proposed by the call-in application and the "*potential inclusion of Lodge Hill in all 4 development scenarios to contribute towards Medway's development needs over the plan period*" (para 4.27).

Consideration of alternatives to Lodge Hill

4.45 The Council provides a section on "*Consideration of alternatives to Lodge Hill… if the proposed development is not supported by the Secretary of State*" (see SA paragraph 4.29). The HCA considers that the inclusion of Lodge Hill in the emerging Local Plan should not rest entirely on the outcome of the Public Inquiry. There could for example be a fresh application made which incorporates the latest thinking on mitigation and compensation strategies to address environmental concerns.

4.46 The following three alternative options which outlined by the Council are analysed below:

a) **Increasing development allocations in Medway-** This would involve increasing allocations elsewhere in line with the option selected and thereby potentially placing inacceptable pressures on the environment and Borough's infrastructure.
b) **Reduce the development targets in the Local Plan** – the HCA does not consider this an option for Medway given the requirement to meet its Objectively Assessed Needs and the need to address past poor performance in terms of housing delivery; or,
c) **Making requests for neighbouring areas to meet unmet housing need outside the borough boundary** – Outside Medway other Local Planning Authorities (LPAs) need to deal with their own housing needs, notwithstanding the Duty to Cooperate, there are pressures in all adjoining LPA areas, so to provide housing land to replace Lodge Hill in adjoining areas is considered by the HCA as undeliverable.

Scoring of 4 development scenarios

4.47 A summary table of the scoring for each Spatial Option is provided at **Appendix 5** with the HCA providing various comments on the 11 Sustainability Appraisal (SA) objectives. The HCA broadly supports the positive sustainability scores for options 1, 3 and 4 and negative outcome for option 2. The HCA appreciates that the scenarios represent an early stage of work in assessing the most sustainable strategy for managing Medway's growth. It is understood that

the SA will also be subject to further consideration, particularly in relation to impact on the existing infrastructure and the transport network, with further assessment being undertaken by the Council in due course.

4.48 In strategic terms, the scoring differential between spatial options 1 and 4 is considered too great, as indicated by the comments in Appendix 5. A significant issue in relation to Spatial Option 1, which is not reflected in the scoring, is the matter of deliverability, and the implications for the existing infrastructure and transport network, particularly in relation to the challenges of delivering large regeneration schemes and the past and present experiences of the Council. There is a significant risk that this option will not increase the overall rates of housing delivery and building at higher densities, particularly in the plan period to 2035. This raises real concerns over the ability of this option to improve the pace and scale of housing delivery in Medway. Taking these comments on board, the differential scoring between these two options would diminish to render Spatial Option 4 a more sustainable option than that is currently indicated. We would invite Medway Council to reconsider their appraisal outputs in this regard.

Habitats Regulation Assessment

4.49 Medway Council published the Habitats Regulation Assessment Screening Report on 13 April 2017. It considers the potential for likely significant effects on the integrity of the European sites that could be affected by Medway's proposed growth as set out in the Local Plan Development Options report. The HCA supports this screening assessment in broad terms and in particular the Council's strategy for development at paragraph 3.10 which "*seeks to make the best use of previously developed land as a starting point for meeting growth needs.*" A key issue is to ensure for the plan as a whole is to seek the best use of Lodge Hill, given its previously developed nature as a former barracks site.

4.50 The HRA also states "*ecological surveys at Lodge Hill, which contains a proportion of previously developed land, have not identified the presence of any of the designated European bird species*" (Para 3.10). The HCA supports the premise that development of the site would not result in the loss of any important supporting wildlife habitats for the SPAs.

4.51 It is acknowledged that further work will be needed to assess more detailed proposals for their potential to have a likely significant effect on the integrity of the European sites, given the spatial nature of the options and that the emerging plan has not yet identified development allocations.

Local Plan approach to Policy Development

Housing Policy Approach

Q9: Do you agree or disagree with the policy approach for housing delivery?

4.52 The HCA agrees with the policy approach taken in relation to housing delivery.

4.53 The approach taken by the Council to "*identify the objectively assessed need for housing*" (para 4.3) and to "*provide for the housing needs of Medway's communities over the plan period*" (para 4.1) is consistent with national extant policy and reflects the need for a plan to be positively prepared. The Strategic Housing and Economic Needs Assessment (SHENA) has identified an objectively assessed housing need of 29,463 homes over the plan period 2012 to 2035. The HCA agrees with the findings of the SHMA, however wishes to highlight the importance of ensuring that this evidence is kept up to date and refreshed at appropriate points during the preparation of the Local Plan (The proposals to simplify the methodology for assessing housing need referenced in the HWP may also be of relevance in this context).

4.54 The objective to "*boost significantly the supply of housing*" (para 4.2) has been reflected in recent government policy and, most recently, in the Housing White Paper. The Housing White Paper (February 2017) emphasises that the HCA will continue to have a central role in delivering more homes across the country, but more needs to be done to increase the scale and pace of house building. Lodge Hill will make an important contribution to the housing target in Medway in the period to 2035. Given the identified residential pipeline of 18,206 homes (MLP, p20), a remaining 11,257 homes still needs to be allocated through the emerging MLP. Lodge Hill will potentially contribute over 25% of this remaining requirement in the plan period to 2035, a substantial contribution towards addressing housing need.

4.55 The policy approach also identifies that "*masterplans will be produced for major residential schemes*" (page 29). Separate representations have been submitted as a Development Framework Document (DFD) by the Greater Hoo Landowners Consortium "GHLC" which provides a high level conceptual masterplan for the 'Greater Hoo' area, which integrates the Lodge Hill site to facilitate a comprehensive approach to housing delivery. The HCA endorses these submissions and notes that the DFD concludes that "*Directing housing-led growth towards Hoo St Werburgh presents a unique opportunity to capitalise upon Medway's enviable sub-regional position and related economic strengths whilst also ensuring that the Borough's most environmentally sensitive areas are protected. Building upon these strategic advantages the expansion of Hoo St Werburgh presents an opportunity to realise a genuinely 'sustainable development' which delivers net economic, environmental and social gains.*" The

HCA is undertaking further technical masterplan and capacity work to evaluate the potential of Lodge Hill to deliver housing in the light of current market and site considerations.

4.56 Scenario 4 the "Urban regeneration and rural town" option is considered best placed to secure the allocations required to meet Medway's objectively assessed housing need target and to enable the development of sustainable communities in Medway. The HCA considers that this option will provide an effective policy basis to ensure the phased delivery of housing supply and associated infrastructure over the plan period.

4.57 Mindful of the priority attached by government to the redevelopment of surplus public sector land for housing purposes, the HCA would support a generic policy in the local plan which enables the disposal and redevelopment of public sector sites for residential use (including affordable housing) to help meet unmet housing need in Medway.

4.58 On a detailed issue, the HCA notes that the Residential Development Pipeline (RDP) in the consultation version of the plan indicates 8,813 homes in the SLAA pipeline sites. However this position doesn't tally with the latest SLAA (20 January 2017), which suggests that the SLAA pipeline sites amount to only 6,598 homes (comprising 6,139 2017 SLAA pipeline sites and 459 Extant SLAA sites with permission from 1/4/16 – 31/12/2016). The HCA seeks clarity as to whether the RDP should be reduced by 2,215 homes to address this discrepancy.

4.59 Para 4.4 please note typographical error – "range, type and mix **of** housing needed in Medway."

Q10: Do you agree or disagree with the policy approach for housing mix?

4.60 The HCA supports, in principle, this policy approach relating to housing mix with the following comments.

4.61 The recognition that "not all sites will be able to accommodate the "*full range of housing types needed*" including "*plots for self-build*" (para 4.8) highlights the importance of (appropriately phased) larger sites coming forward which have a greater opportunity to "*encourage a sustainable mix of market housing to address local requirements*". Given the potential development quantum at Lodge Hill and Greater Hoo this presents an opportunity to provide "*a variety of housing types and sizes… to achieve balanced and sustainable communities.*" The HCA considers that this approach is consistent with NPPF para 50 which seeks delivery of "*a wide choice of high quality homes… and create sustainable, inclusive and mixed communities.*"

4.62 Due to the large scale of development proposed at Lodge Hill, there is an opportunity to provide a wide-range of housing and mix of tenures which will meet the wider social and demographic needs of the local communities at Chattenden and Hoo.

4.63 **Q11: Do you agree or disagree with the policy approach for affordable housing and starter homes?**

4.64 The HCA supports the policy approach to affordable housing and starter homes and provides comments in the light of the Housing White Paper (HWP) published February 2017:

4.65 The HWP states that the government "*in keeping with our approach to deliver a range of affordable homes to buy, rather than a mandatory requirement for starter homes,* ***we intend to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units***. *It will be for local areas to work with developers to agree an appropriate level of delivery of starter homes, alongside other affordable home ownership and rented tenures.*"

4.66 Whilst the HCA supports the local plan emerging affordable housing target of 25% for developments over 15 units, the policy should be sufficiently flexible to accommodate the emerging national policy approach as referenced above and should take into account relevant viability guidance (NPPG Paragraph: 019 Reference ID: 10-019-20140306).

Q12: Do you agree or disagree with the policy approach for Supported Housing, Nursing Homes and Older Persons Accommodation?

4.67 Refer to the response to Q10 'housing mix' above. No further HCA comment, although it is noted that that the Lodge Hill call-in application makes provision for an assisted living facility and nursing home (120 units in total at 10,000 sq m) as part of an approach aimed at creating a new sustainable community at Lodge Hill.

Q13: Do you agree or disagree with the policy approach for student accommodation?

4.68 No HCA comment.

Q14: Do you agree or disagree with the policy approach for mobile home parks?

4.69 No HCA comment.

Q15: Do you agree or disagree with the policy approach for houseboats?

4.70 No HCA Comment.

Q16: Do you agree or disagree with the policy approach for houses of multiple occupation?

4.71 No HCA Comment.

Q17: Do you agree or disagree with the policy approach for self-build and custom house building?

4.72 The HCA supports proposals for self-build in line with the NPPF (para 71) and Housing White Paper (para 3.16) which promotes the Right to Build, so that people seeking to build their own home can easily access the local authority register in their area to identify development opportunities. It is noted that Medway Council set up its register in April 2016 and that "*the new 'Right to Build' requires local planning authorities to find land for those seeking a custom built home in their area, and they must keep a register of those wanting to build their own home*" (HWP, Para 3.15).

4.73 The HCA supports the need to ensure that a developer has given "*due consideration to allocating a portion of the site to self build/ custom build*" (page 39) but this should reflect closely identified demand as per the Council's register to ensure that the scale and pace of house building is not unduly impacted by plots being set aside for self-build which remain unused.

Q18: Do you agree or disagree with the policy approach for gypsy, traveller and travelling show people accommodation?

4.74 No HCA comments.

Q19: Are there any alternative sustainable development options for housing that have not been considered?

4.75 No HCA comments.

Employment Policy Approach

Q20: Do you agree or disagree with the policy approach for economic development?

4.76 The HCA support the approach taken to economic development.

4.77 The policy approach to "*make provision for the scale, range, quality and locational requirements of employment land identified in the Employment Land Needs Assessment*" (page 47) is supported in the context of national policy NPPF para 161 which seeks assess "*the needs for land or floorspace for economic development… including retail and leisure development.*" The Employment Land Needs Assessment as part of the SHENA, sets the

following employment requirements (sqm land requirement) for Medway for the plan period 2012-2035:

- Office 49,943 sq m
- Industrial 155,748 sq m
- Warehousing 164,263 sq m

4.78 Lodge Hill will contribute towards meeting the employment land needs targets.. It is noted that the call-in Lodge Hill planning application proposes:

- Up to 36,750 sq m of B1 floor space (gross); and,
- Up to 7,350 sq m of B2 floor space (gross).

4.79 The proposals have been formulated having regard to and detailed policy review, an assessment of the wider economic context and a robust market assessment. The vision for Lodge Hill is to deliver a genuinely mixed-use development which complements the wider Medway offer, is well-connected, reduces the need to travel for residents and has strong relationships with education facilities. The employment proposals at Lodge Hill will be reviewed to ensure that they remain market facing and deliverable.

4.80 It is acknowledged that in all four growth scenarios significant employment growth is proposed at Kingsnorth and Grain Power Stations. Whilst Lodge Hill will contribute towards employment land needs, it is also located close to these two large employment expansion areas. In this context, it is important to generate more sustainable patterns of commuting which will avoid the need to travel across the Medway. It is important that housing is located close to employment growth, as highlighted in para 55 of the NPPF.

Q21: Do you agree or disagree with the policy approach for the rural economy?

4.81 The HCA agrees with the policy approach taken.

4.82 The HCA's support for scenario 4 would be consistent with the NPPF para 28 which states that "*planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.*" The development of Lodge Hill and the Greater Hoo development will provide additional jobs which will support local housing growth and complement economic opportunities in the Medway Towns and large industrial sites, including accommodation for small and growing businesses.

Q22: Do you agree or disagree with the policy approach for tourism?

4.83 See question 23, below.

Q23: Do you agree or disagree with the policy approach for visitor accommodation?

4.84 The HCA supports this policy which supports visitor accommodation which meets the principles of sustainable development. The provision of a hotel(s) as part of the called in application will provide visitor accommodation in a building of 14,070 sq m.

Q24: Are there any alternative sustainable development options for employment that have not been considered?

4.85 No HCA Comments.

Retail and Town Centres Policy Approach

Q25: Do you agree or disagree with the policy approach for retail and town centres?

4.86 The HCA supports the policy approach taken to retail subject to the following comments:

4.87 The North Kent Retail Study in collaboration with Gravesham Council identifies the following retail needs which are supported by the HCA based on the evidence:

- A need for 46,100 sq m comparison floorspace by 2031 and 70,500 sq m by 2037; and,
- A need for 12,300 sq m of convenience retail floorspace by 2031 and 13,200 sq m by 2037.

4.88 The HCA acknowledges that the Local Plan "*will establish a retail hierarchy*" (page 59) for the preferred development scenario and this will need to be considered in light of where a new town fits into this hierarchy. In relation to a proposed new town option at Greater Hoo, a retail strategy will need to be devised to create an appropriate retail hierarchy, within this new settlement. It is envisaged that Lodge Hill will deliver a retail facility of 'district centre' scale which will complement the proposed (expanded) Hoo St Werburgh retail centre and serve the Lodge Hill development and immediate catchment area. The Retail Impact Assessment undertaken to date indicated that the new centre proposed in Lodge Hill would not impact adversely upon any other centres in the locality. This work will need to be updated however, to assess the position with respect to the Greater Hoo option, which will require significant new retail and other facilities, in addition to those at Lodge Hill.

Q26: Are there any alternative sustainable development options for retail and town centres that have not been considered?

4.89 No HCA Comments.

Natural Environment and Green Belt Policy Approach

Q27: Do you agree or disagree with the policy approach for Strategic Access Management and Monitoring?

4.90 The HCA recognises the rationale for the approach taken to 'Strategic Access Management and Monitoring' to address potential damage from population increases on the designated habitats of the Thames, Medway and Swale Estuaries and Marshes. A key issue, however, will be the level of contribution required from any tariff contribution. It will be important to ensure that potential contributions are requested in accordance with provisions in the Community Infrastructure Levy Regulations 2010 in relation to planning obligations and national guidance in the NPPG (Paragraph: 001 Reference ID: 23b-001-20161116).

Q28: Do you agree or disagree with the policy approach for securing strong Green Infrastructure?

4.91 The HCA agrees with the approach taken subject to the following comments:

4.92 The policy approach to securing strong Green Infrastructure set out in the development options notes: "*The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a Special Protection Area, Ramsar site and/or Special Area of Conservation. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland*" (page 65) (this is echoed in paragraph 7.4). In relation to the natural environment as a whole, it is recognised that large parts of Medway are constrained by environmental designations including Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI) and policies including Green Belt and Kent Downs AONB, and the presumptions will be to safeguard these designations, unless there are valid reasons to justify development.

4.93 The degree of protection afforded to these designations must be commensurate with their acknowledged importance, and a balance must be struck between the three dimensions of sustainable development namely; social, economic and environmental impacts, and the identified benefits of the development, in accordance with national policy.

4.94 It is considered inevitable, given the housing and employment growth requirements in Medway and the need for an effective, positively prepared plan, that some environmentally sensitive land will be required for development. National planning policy requires that significant harm to biodiversity should be avoided, mitigated or, as a last resort, compensated for, and that where an adverse effect on a SSSI is likely, an exception should only be made where the benefits clearly outweigh the impacts (NPPF paragraph 118). The Lodge Hill proposals will mitigate and compensate for harm to the Chattenden Woods and Lodge Hill

SSSI and, will provide significant social, economic and environmental benefits, which the HCA considers will outweigh the impacts of not developing the site, when assessed in the planning balance. As such the HCA recommends that the Council reflects in this policy the following wording: "*In appropriate circumstances, suitable mitigation and compensation will be acceptable, provided it is appropriate and the wider social and economic benefits are justified.*"

4.95 To inform the Council's approach to protecting the network of Green Infrastructure (GI) across rural and urban Medway the Council's Green Infrastructure Framework, to be produced later in 2017, will need to define the GI network. There is scope to create a substantial network of green infrastructure within the Greater Hoo Development Option (including at Lodge Hill) and this should be incorporated into the masterplanning of such options. This opportunity to create such corridors and linkages will provide ecological and environmental opportunities and enhancements for people and wildlife. The redevelopment of Lodge Hill will add value to this approach.

4.96 In addition, paragraph 75 of the NPPF states that policies should protect and enhance public rights of way and access, and states that local authorities should seek opportunities to provide better facilities for users, for example, by adding links to existing rights of way networks. This is particularly pertinent to Lodge Hill given its historic military use, which has precluded public access through and into the site.

4.97 The green infrastructure proposed at Lodge Hill is a core component of the vision for the site. Complementing this, will be a series of new pedestrian/ cycling routes aimed at stitching Lodge Hill back into the wider Hoo area improving local connectivity.

Q29: Do you agree or disagree with the policy approach for landscape?

4.98 The HCA agrees with the policy approach to landscape and is mindful of the need to demonstrate how development at Lodge Hill will be assimilated into the landscape in a sensitive manner having regard to the updated Medway Landscape Character Assessment and GI Framework which will need to define the character and qualities of the Medway Landscape. The Medway Landscape Character Assessment was produced in 2011 and it makes reference to Lodge Hill being identified for development as a new, mixed-use settlement (page 5, 10, 37, section 14).

Q30: Do you agree or disagree with the policy approach for flood risk?

4.99 Agree - The HCA supports the approach to "*manage flood risk from all sources*" (page 67) and notes the Strategic Flood Risk Assessment and Local Flood Risk Management Strategy is in process and will influence emerging policies and related mitigation strategies.

Q31: Do you agree or disagree with the policy approach for air quality?

4.100 No HCA comments.

Q32: Are there any alternative sustainable development options for the natural environment and green belt that have not been considered?

4.101 No HCA comments.

Built Environment Policy Approach

Q33: Do you agree or disagree with the policy approach for design?

4.102 The HCA supports Medway's emerging policy aspiration for "development [to] be of a high quality design that makes a contribution appropriate to the character and appearance of its surroundings." This appears to be consistent with national policy where "*Good design is a key aspect of sustainable development*" (NPPF para 56), and the need to "*plan positively for the achievement of high quality and inclusive design for all development*" NPPF para 57.

4.103 The government supports a high quality approach to design and "*expects developers to build more homes, to engage with communities and promote the benefits of development,* ***to focus on design and quality,*** *and to build homes swiftly where permission is granted*" see the Housing White Paper (page 16).

4.104 The HCA's policy approach reflects revised planning practice guidance which gives local authorities the option to set additional technical requirements exceeding those in the Building Regulations and the optional National Described Space Standards. The HCA policy position in relation to energy efficiency in buildings requires compliance with the Building Regulations.

Q34: Do you agree or disagree with the policy approach for housing design?

4.105 The HCA agrees in principle with the policy approach for housing design. The HCA's policy position is supportive of the Government's Nationally Described Space Standards which the Council propose adopting in policy. It should be noted that the Housing White Paper highlights that the Government will review these standards "*to ensure greater local housing choice, while ensuring we avoid a race to the bottom in the size of homes on offer*" (HWP para 1.55). The HCA therefore advises an approach that allows any 'updated' Government standards to be adequately reflected in future decision making.

4.106 In addition, the HCA's policy seeks to encourage the use of 'Building for Life 12' and 'Whole Life Costing' to guide the design of buildings and would encourage the Council to adopt this approach.

4.107 The emerging policy approach also seeks to ensure development proposals "*creates a safe environment*" (page 70). This is considered important to ensure new developments provide a safe environment. In the case of Lodge Hill this means that the site should be fully cleared of hazards, including any contamination or ordnance, prior to public access.

Q35: Do you agree or disagree with the policy approach for housing density?

4.108 The HCA concurs with the need to "support developments at higher densities in appropriate locations." The Housing White Paper notes that the Government proposes to amend the National Planning Policy Framework to make sure individual proposals (see, Para 1.53):

- *Make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing requirements;*
- *Address the particular scope for higher-density housing in urban locations that are well served by public transport; and,*
- *Ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area.*

4.109 The HCA attaches significant weight to the need to deliver infrastructure of appropriate capacity and at an appropriate pace to support the new development options. The proposal to provide higher density housing near to public transport nodes is supported. In addition, It is noted that the HWP seeks "*optimising the proposed density of development*" (HWP para 1.39) before any consideration of amending Green Belt boundaries. The HCA encourages this approach and suggest that for this reason Scenario Option 2 (Suburban expansion) which includes development on Green Belt land in Medway should be avoided.

4.110 It is noted that "*The council will consider varying attitudes to density on a case by case basis in developing masterplans and development briefs for regeneration sites*" (page 73). This thinking should also be applied to developing masterplans for the Greater Hoo Development Option (including Lodge Hill) where the density of development should clearly reflect the character, accessibility and infrastructure capacity of the area.

Q36: Do you agree or disagree with the policy approach for heritage?

4.111 The HCA agrees in principle with this approach. The policy approach is considered to be consistent with national policy, in particular it is noted that indent 4 of the emerging policy seeks to "*make sensitive use of historic assets, **particularly where they are under-used or redundant***". The HCA considers that this is material to the redevelopment of Lodge Hill.

4.112 A core planning principle of the NPPF is to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (NPPF paragraph 17, also reflected in paragraph 126). In developing a strategy, it states that LPAs should take account of viable uses; wider social, cultural, economic and environmental benefits; and the positive contribution of development to local character and distinctiveness (NPPF paragraph 126).

4.113 The importance of heritage and other assets at Lodge Hill is recognised fully and a significant amount of work has been carried out already in relation to the historic environment as part of the planning application. The proposals for Lodge Hill reflect NPPF advice in this regard.

4.114 Lodge Hill has a long and important military history. From the outset, this was recognised as a key component of the vision, lending the site a unique and distinct sense of place. As part of producing the site-specific information, Medway Council and English Heritage (now Historic England) were engaged from the outset to identify an appropriate response to the redevelopment of the site. All assets of heritage significance will be protected (and enhanced, where possible) in the masterplan proposals for the site in line with advice in the NPPF. Any fresh proposals will continue this approach.

Q37: Are there any alternative sustainable development options for the built environment that have not been considered?

4.115 No HCA comment.

Health and Communities Policy Approach

Q38: Do you agree or disagree with the policy approach for health?

4.116 The HCA agrees in principle with this approach. "*The need for new developments to be located within a sustainable distance of local health practices*" appears consistent with national policy contained in the NPPF. The need for "significant new developments to undertake health impact assessments" is not a requirement of the NPPF although it is acknowledged in the NPPG that "*a health impact assessment may be a useful tool to use where there are expected to be significant impacts*" (Paragraph: 004 Reference ID: 53-004-20140306). Forthcoming changes to the Environmental Impact Assessment Regulations in 2017 will also require an assessment of human health. The Greater Hoo Development Scenario will seek to incorporate suitable health infrastructure and reference to this should be made in the Infrastructure Delivery Plan.

4.117 The HCA will explore means by which the proposed development may support the overall sustainability of development on the Hoo Peninsula. The HCA highlights the contribution Lodge

Hill will make in providing for the recreational needs of the community, and potential linkages with the wider green infrastructure strategy, in order to promote healthy lifestyles.

Q39: Are there any alternative sustainable development options for health and communities that have not been considered?

4.118 No HCA comment.

Infrastructure Policy Approach

Q40: Do you agree or disagree with the policy approach for general and strategic infrastructure?

4.119 The HCA agrees in principle to this approach. The HCA notes the need for "*on and off site infrastructure… identified to meet the needs of the new development*". The Infrastructure Delivery Plan will be a key component of this approach which will be developed to support the Council's chosen option. The HCA would welcome the opportunity to discuss potential mechanisms to fund and deliver this strategic infrastructure both for Lodge Hill and the Greater Hoo scenario, with Medway Council.

4.120 Significant new infrastructure will be needed to support the HCA's preferred Scenario 4, and the phasing and timing of delivery are critical considerations alongside funding. The HCA can potentially play a key role, particularly in relation to enabling development at Lodge Hill. It will be critical to ensure that the emerging Infrastructure Delivery Plan is coordinated to ensure that it encapsulates the requirements of the overall quantum of development proposed at Lodge Hill and in the wider development at Hoo St Werburgh to ensure the necessary infrastructure is provided in a timely manner.

4.121 The Village Infrastructure Audit, Published January 2017 acknowledges that Hoo St Werburgh is the largest village in Medway. The proposed rural village and Lodge Hill developments have the potential to significantly improve the existing infrastructure provision to the benefit of the local communities.

Q41: Do you agree or disagree with the policy approach for education?

4.122 The HCA supports the approach that "*new residential development proposals of a significant scale should seek to provide educational facilities within their development where suitable.*" The development of a comprehensive and sustainable new settlement at Hoo (including Lodge Hill) offers the most viable means of delivering new social and community infrastructure to address the growth requirements in an appropriately phased manner. The proposed development at Lodge Hill will include appropriate on site school provision the quantum of education provision within the proposed development will meet the needs generated by the

development. The Infrastructure Delivery Plan will need to identify clearly the Council's expectations for education provision for the Greater Hoo Development Option 4 and Lodge Hill, in particular.

Q42: Do you agree or disagree with the policy approach for community facilities?

4.123 The HCA supports the approach that "*large scale residential developments will be required to provide community facilities to meet the needs of new residents and seek opportunities to support integration with existing communities*". This would contribute towards the plan being positively prepared in accordance with NPPF paragraph 70. The Infrastructure Delivery Plan and emerging local plan policy should indicate clearly the Councils reasonable expectations for delivery of community facilities in connection with Development Option 4.

4.124 The proposed development at Lodge Hill would include a community facility. The historic and current uses at the site have prevented public access to the majority of the site area. The new mixed-use settlement proposed for Lodge Hill will open up this area to offer employment floorspace, high quality public realm, community uses, and market and affordable housing that will combine to bring a new mixed use community to Medway District. Together with the social infrastructure created, the proposed development will provide opportunities for greater social interaction between residents, workers, visitors and the wider community.

4.125 The proposed development will provide a significant contribution towards provision of social infrastructure for Lodge Hill and for the Hoo Peninsula as a whole. This will include new schools, the extension or re-provision of the Chattenden Primary School and a health centre. There will be extensive public open space within the site.

4.126 The proposed on-site community facilities fit well with the demands arising from the proposed development and the proposals have been designed to ensure it provides maximum flexibility which can address changing demands over time. These proposals will complement those likely to emerge in the Greater Hoo Development Option (4).

Q43: Do you agree or disagree with the policy approach for communication infrastructure?

The NPPF recognises the vital role that high speed broadband technology and other communications networks play in enhancing the provision of local community facilities and services. The HCA supports this approach.

Q44: Do you agree or disagree with the policy approach for open space and sports facilities?

4.127 The HCA generally supports this approach, but in the case of Lodge Hill, would make the point that the scale of development means that the provision of open space/ recreational facilities needs to be quantified from first principles derived from an up to date evidence base and

associated conceptual plan. It is not simply the case that existing private open space, for example, should be protected, rather such amenities should be located, and of a scale, that properly meets the needs of existing and future residents in a comprehensive and planned manner.

4.128 The Lodge Hill planning application provides the opportunity to deliver a significant quantum of open space and recreational facilities as part of a sustainable new settlement. Approximately 100ha of open space (including water bodies) is proposed in the call-in application, which is almost three times the existing local authority standard (3.25ha per 1,000 population).

4.129 Standards for sports provision should be devised from detailed evidence on existing levels of provision and future needs (based upon projected levels of growth). The Greater Hoo new settlement proposal (including Lodge Hill) provides the opportunity to deliver playing fields and pitches based on local requirements as part of creating a wider sustainable community.

Q45: Do you agree or disagree with the policy approach for utilities?

4.130 Agree. The Infrastructure Delivery Plan will be a key driver in implementation of appropriate utility capacity to serve the preferred Development Option. The HCA reserves the right to comment on the Infrastructure Delivery Plan once further details are published.

4.131 The HCA is committed to developing Lodge Hill and ensuring that the growth is supported by the requisite utilities infrastructure.

Q46: Do you agree or disagree with the policy approach for implementation and delivery?

4.132 The Infrastructure Position Statement (IPS) (February 2017) provides a baseline position statement on infrastructure. The HCA believes that significant further work will be required post consultation identifying infrastructure needs for the Local Plan Development Options, particularly in relation to Lodge Hill and a potential new town at Hoo St Werburgh. The HCA and the Greater Hoo Landowners Consortium will work collaboratively with Medway Council to achieve this objective.

4.133 The HCA requests that the policy wording in relation to specific infrastructure to support the Lodge Hill development is further refined by the Council in liaison with the HCA. This position will need to be considered in relation to planned growth levels, as development, including Lodge Hill and the proposed Hoo Rural Town option, will have significant infrastructure requirements that will need to be viable and deliverable in a co-ordinated manner.

4.134 The emerging policy approach seeks, quite rightly, to ensure the viability of development. The NPPG has specific guidance on how viability should be considered for brownfield sites in the

context of plan-making, implementation and delivery. It notes that "*Local Plan policies should reflect the desirability of re-using brownfield land, and the fact that brownfield land is often more expensive to develop… Particular consideration should also be given to Local Plan policies on planning obligations, design, density and infrastructure investment, as well as in setting the Community Infrastructure Levy, to promote the viability of brownfield sites across the local area… Authorities do not have to allocate only those sites that provide the maximum return for landowners and developers.*" (NPPG Paragraph: 025 Reference ID: 10-025-20140306). Given the constraints on development of the previously developed Lodge Hill site, it will be critical to ensure that the emerging proposals are brought forward in a way that has full regard to their early implementation with the timely delivery of supporting infrastructure, a key component of this package.

4.135 The Lodge Hill proposal will deliver appropriate supporting infrastructure in a commercially viable form and within a timely manner.

4.136 The HCA will work with Medway Council and other stakeholders to ensure the successful implementation of the Lodge Hill development and the Greater Hoo Development Option in line with the Agency's corporate objectives.

Q47: Are there any alternative sustainable development options for infrastructure that have not been considered?

4.137 No HCA comment.

Section 11 Transport Policy Approach

Q48: Do you agree or disagree with the policy approach for transport?

4.138 The HCA supports in principle this policy approach, in particular the need to enable "*sustainable transport*" and the requirement for Transport Assessments and Transport Statements to mitigate the impacts of new development. This approach appears consistent with national policy.

4.139 A significant amount of work has already been carried out in relation to transport and access in relation to the Lodge Hill planning application and this is being refreshed in light of the new strategic transportation modelling commissioned by Medway Council. Given the scale of development in Scenario 4, there is scope to significantly improve the accessibility of Chattenden and Hoo St Werburgh and provide a much enhanced public transport network to this area and the wider peninsular, thus improving social and economic opportunities. The HCA will work with Medway Council in relation to the delivery of the necessary infrastructure to support the Greater Hoo development option.

Q49: Do you agree or disagree with the policy approach for transport and the River Medway?

4.140 No HCA comment.

Q50: Do you agree or disagree with the policy approach for waterfronts and river access?

4.141 No HCA comment.

Q51: Do you agree or disagree with the policy approach for marinas and moorings?

4.142 No HCA comment.

Q52: Do you agree or disagree with the policy approach for aviation?

4.143 No HCA comment.

Q53: Do you agree or disagree with the policy approach for vehicle parking?

4.144 No HCA comment.

Q54: Do you agree or disagree with the policy approach for cycle parking?

4.145 No HCA comment.

Q55: Do you agree or disagree with the policy approach for connectivity?

4.146 No HCA comment.

Q56: Are there any alternative sustainable development options for sustainable transport that have not been considered?

4.147 No HCA comment.

Section 12 Minerals, Waste and Energy

4.148 No HCA comment.

Q57: Do you agree or disagree with the policy approach for minerals planning?

4.149 No HCA comment.

Q58: Do you agree or disagree with the policy approach for waste planning?

4.150 No HCA comment.

Q59: Do you agree or disagree with the policy approach for energy?

4.151 No HCA comment.

Q60: Do you agree or disagree with the policy approach for renewable and low carbon technologies?

4.152 Lodge Hill will seek to conform to NPPF para 93 and supports the "*delivery of renewable and low carbon energy and associated infrastructure.*" There is potential to create a localised renewable grid network for part of the site subject to viability considerations.

Q61: Are there any alternative sustainable development options for Minerals, Waste and Energy that have not been considered?

4.153 No HCA comment.

General Comments

Q62: Is there anything else Medway Council should consider about the development options or the policy approaches in addition to what is commented upon above?

4.154 The HCA highlights the importance of the preferred development option being demonstrated to be deliverable in terms of infrastructure and landownership. The HCA welcomes that the Infrastructure Delivery Plan will be a key component of the local plan which will be developed alongside the Council's preferred option. The HCA considers that this must facilitate Greater Hoo Development Option 4. The HCA reserves the right to comment on the Infrastructure Delivery Plan once further details are published.

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An APLEONA company

Appendix I Replacement Site Location Plan

N

0m 50m 100m 200m

LandSecurities

Defence Infrastructure Organisation

LODGE HILL - REPLACEMENT SITE LOCATION PLAN (RED LINE)

Outline Planning Application

dwg no: CL-PR-XXX-XX-DR-MP-616-0024 REV B

scale: 1:7500@A1 date: FEB 2014

PRP

GVA

An APLEONA company

Appendix II Lodge Hill Site Areas

gva.co.uk

574000 575000 576000 577000 578000

175000 174000 173000 172000

N

Cooling Street
Cliffe Woods
Royal School of Military Engineering
Lodge Hill Training Area
Lodge Hill Camp
Deangate Ridge Golf Course
Chattenden
Hoo St Werburgh
Lower Upnor
Noke Street
Hoo Common
River Medway

Key

- Site boundary
- Lodge Hill Camp
- Lodge Hill training area
- Chattenden Barracks
- Chattenden training area

0 250 500 m

Scale at A3: 1:15,000

Lodge Hill, Chattenden

amec foster wheeler

Lodge Hill site areas

March 2017 38835-Lea03.mxd smitv

file: H:\Projects\38835 Lodge Hill - planning application and call-in\rquir\A5 Design\Drawings\GIS\38835-Lea03.mxd

GVA

An APLEONA company

Appendix III Replacement Indicative Masterplan

20M ANCIENT WOODLAND BUFFER ZONE
LODGE HILL WOOD
ANCIENT WOODLAND
WYBORNES WOOD
ANCIENT WOODLAND
200M
100M
50M
ROUGH SHAW/LODGE HILL WOOD/
GREAT CHATTENDEN WOOD SITE
SETBACK DISTANCES
COUNTRYSIDE PARK
EASTERN
SHELTERBELT
(EXISTING)
EASTGATE
SERVICES HUB
EASTGATE
PRIMARY SCHOOL
ROUGH SHAW
HERITAGE
BEACON PROJECT
COUNTRYSIDE PARK
CENTRAL
SHELTERBELT
(EXISTING)
LODGE HILL
KEY SERVICE HUB
HEALTH
CENTRE
WESTERN
SHELTERBELT
(PROPOSED)
MARKET
SQUARE
NATURE
RESERVE
SERVICES
EXCLUSION ZONE
TO GAS LINE
(6M EACH SIDE)
ASSISTED LIVING
/ NURSING HOME
CENTRAL
PARK
FOOD
STORE
LODGE HILL
SECONDARY SCHOOL
DEANGATE WOOD
ANCIENT WOODLAND
WESTGATE
SERVICE HUB
KNOWLEDGE
PARK
BOWLING CENTRE
HERITAGE
BEACON PROJECT
GOLF CLUB HOUSE
WESTGATE
PRIMARY SCHOOL
LODGE HILL
HOTEL
50M
100M
200M
ROUGH SHAW/LODGE HILL WOOD/
GREAT CHATTENDEN WOOD SITE
SETBACK DISTANCES
SERVICES
NATURE
RESERVE
THE LODGE
CHATTENDEN FARM
ROUND TOP WOOD
ANCIENT WOODLAND
RAMS BOTTOM WOOD
CHATTENDEN
SERVICE HUB
CHATTENDEN
HOTEL
KNOWLEDGE
PARK
EXISTING
CHURCH
HIGHWAY IMPROVEMENTS
(LOCHAT ROAD)
EXISTING CHATTENDEN
PRIMARY SCHOOL
SERVICES
WOODFIELD WAY
HIGHWAY IMPROVEMENTS (FOUR ELMS)

LEGEND:

- ANCIENT WOODLAND
- CATEGORY A TREES
- CATEGORY B TREES RETAINED
- EXISTING WOODLAND RETAINED
- PUBLIC OPEN SPACE
- HIGHWAY IMPROVEMENTS
- RETAIL/COMMUNITY/CIVIC/ VILLAGE OFFICE
- HEALTH CENTRE
- OFFICE(KNOWLEDGE PARK)
- HOTEL
- BUFFER ZONES - ROUGH SHAW/LODGE HILL WOOD/ GREAT CHATTENDEN WOOD (100M-200M) ANCIENT WOODLAND(20M)
- COMMUNITY AND EDUCATION
- BUILDING EXCLUSION ZONE FOR UNDERGROUND SERVICES
- SERVICES COMPOUNDS
- STRATEGIC VEHICULAR SITE ACCESS
- SECONDARY VEHICULAR ACCESS
- EXISTING MILITARY HERITAGE BOUNDARY
- RESIDENTIAL HIGH DENSITY
- RESIDENTIAL MEDIUM DENSITY (INCLUDING ELDERLY ACCOMMODATION)
- RESIDENTIAL LOW DENSITY
- ASSISTED LIVING / NURSING HOME
- EXISTING BUILDINGS

N

0m 50m 100m 200m

LandSecurities

Defence Infrastructure Organisation

LODGE HILL - REPLACEMENT INDICATIVE MASTERPLAN

Outline Planning Application

dwg no: CL-PR-XXX-XX-DR-MP-616-0020 REV H

scale: 1:5000@A1 date: FEB 2014

PRP

GVA

An APLEONA company

Appendix IV Lodge Hill Inquiry Programme

Reference: APP/A2280/V/15/3004956

TOWN AND COUNTRY PLANNING ACT 1990
APPLICATION BY Defence Infrastructure Organisation
SITE AT Lodge Hill, Chattenden, Rochester

ACTION	TIMETABLE
Call-in date	13 February 2015
Deadline for comments from interested parties	3 April 2015
Submission of statements of case	Applicant 19 December 2017 LPA & Rule 6 parties 23 January 2018
Statement of common ground	13 February 2018
Submission of proofs of evidence	20 February 2018
Witness names and anticipated duration for: • opening and closing statements • evidence in chief • cross examination of other parties' witnesses	27 February 2018
Inquiry	20 March 2018 10.00am Venue TBC
Estimated number of sitting days	28
Report submitted to Secretary of State on or before	TBA[1]
Decision issued on or before	TBA [2]

[1] The target date for submission of the report to the Secretary of State will be confirmed within 10 working days of the close of the inquiry unless there are exceptional reasons
[2] In accordance with the requirements of Schedule 2 of the Planning and Compulsory Purchase Act 2004, you will be advised within 10 working days after the close of the Inquiry of the timetable set for the Secretary of State issuing the decision

GVA

An APLEONA company

Appendix V HCA Comments on SA Spatial Options Framework

Sustainability Appraisal - Summary Table for Development Options

Option	Sustainability Appraisal Objectives											
	1 - To improve skill levels and encourage suitable employment opportunities in accessible locations	2 - To have a successful economic base able to sustain economic growth and competitiveness	3 - To protect and support the growth, vitality and viability of the Boroughs centres	4 - Conserve and enhance the existing green network	5 - To reduce our contribution to the impacts of climate change	6 - To adapt and mitigate the impacts of climate change	7 - Promoting, enhancing and respecting our historic/cultural heritage assets	8 - Making the best use of natural assets	9 - To facilitate the improved health and wellbeing of the Boroughs residents	10 - Promote strong and inclusive communities	11 - To provide sufficient and affordable housing suitable to peoples lifestyles and needs	Total
Spatial Option 1- Urban Regeneration	+4	+5	+5	+3	+2/?	+2/?	+2	+3	+2	+2	+4	+34
Spatial Option 2- Suburban Expansion	0/?	-2	-4	?/+1	-4	-1	0	-5	-2	-5	+4	-18
Spatial Option 3- A Rural Focus	+2	+2	-1	+2	-2	0	+1	-4	0	0	+4	+4
Spatial Option 4- Urban Regeneration and a Rural Town	+2	+3	+2	+3	-1	+3	+2	0	+1	+2	+4	+21

SA Objective	HCA comments on scoring
1	Whilst Spatial Option 1 has potential to benefit existing training facilities in the centres, there is doubt as to whether this option would be deliverable in the plan period and the impacts on the existing infrastructure and the transport network are likely to be significant. Option 4 would provide a more balanced solution and would reap the benefits of additional employment provision on the Hoo Peninsular as well as delivering urban regeneration sites.
2	Given the main areas of economic enhancement will be utilising and expanding the former Grain and Kingsnorth Power Station it is considered that Option 4 would have greater benefits when compared to Option 1 in terms of providing opportunities to access these employment areas. The SA comments that "*Planned expansion of Hoo and Lodge Hill would include additional employment and retail land, boosting job opportunities in these areas. More significant development on the Hoo Peninsula could strengthen the attraction of the existing large employment sites. New development could increase the attractiveness of the rural area as a location for business investment.*" The benefits of this expansion on existing large employment areas on Spatial Option 4 should not be underestimated. On this basis the scoring should be reassessed.
3	Whilst Spatial Option 1 would enhance the existing major centres there is a risk that the scale and pace of delivery housing would be hampered by infrastructure constraints and risks not being deliverable in the plan period to 2035, which should reduce the overall positive scoring for this option. Spatial Option 4 is considered more deliverable and has the potential to enhance the vitality and viability of the existing rural centre at Hoo St Werburgh whilst also achieving the benefits of enhancing the larger centres in Medway. This is reflected to some degree in the SA which states "*significant growth around Hoo St Werburgh and Lodge Hill would support an improved and strengthened centre offer. The small rural town could support the wider Peninsula. This could strengthen the vitality of Hoo St Werburgh and potentially reduce car journeys on the Peninsula.*" Again, the Council is invited to reconsider the scoring.
4	Option 4 has the potential to enhance the Green Infrastructure in both the urban and rural areas. It would be more challenging to enhance the green network in Option 1 alone. It is noted that the Council seeks to direct development "*away from areas of environmental designations (if an acceptable solution can be determined for ecological mitigation and compensation at Lodge Hill). Development at Lodge Hill, if supported by the Secretary of State, would require an effective compensation and mitigation strategy to address potential damage to the SSSI features.*" Concerns in relation to environmental impacts at Lodge Hill will be addressed fully through a well considered compensation and mitigation strategy.
5	Potential impacts on congestion and failure to deliver adequate infrastructure is an issue that should be given additional weight, particularly in Option 1 where impacts on the 3 AQMAs could be severe and need to be re-assessed as part of the further assessment being undertaken by the Council. It is considered that development around Hoo St Werburgh and Lodge Hill could have a significantly positive effect on the wider peninsular, reducing the need to travel to the enhanced and expanded employment areas at Kingsnorth and Grain and would support the retention and development of local services. The Council is invited to reassess this scoring.
6	Like objective 5, scoring for option 1 should be re-considered particularly in the light of further assessment.
7	No comments.
8	Whilst option 1 would have negligible impact on the release of greenfield sites, there are significant risks relating to whether or not this option could deliver the required level of housing in Medway over the plan period. Option 4 whilst releasing greenfield sites would allow enhancement of the existing Green Infrastructure Network providing greater public access to the natural assets. The variations in scoring between Options 1 and 4 seems too large.
9	The score for option 4 could be higher when considering the potential recreation opportunities and benefits for an enhanced rural village. It is not clear why Option 1 would improve the health of local residents. In practice, Option 1 alone could significantly increase air pollution to the detriment of the health of Medway residents.
10	The Greater Hoo concept plan (option 4) will help shape the establishment of a new and inclusive community, rather than exclusively retrofitting new development into existing urban areas as per Option 1. For this reason Option 4 could be served higher.
11	Option 4 will enable a more comprehensive response to satisfy this objective with fewer constraints.

[redacted]

From: Brian Warner [redacted]
Sent: 20 February 2017 13:04
To: futuremedway
Subject: re New Medway Local plan

Follow Up Flag: Follow up
Flag Status: Completed

This is sent of behalf of Hempstead Residents Association

Although we are in general agreement with much of the local plans there are two areas of potential development that concern us greatly:

1. Darland valley
2. Capstone Valley

These two areas provide a green lung in the Medway Towns and also ensure that Hempstead remains an area in its own right and does not become a small part of a large conurbation combining Walderslade, Lordswood, Hempstead, Luton and Gillingham.
Any development in those areas would not only eradicate an area full of trees, insects and wildlife but would also lead to an enormous increase in traffic, traffic congestion and pollution

B Warner-chairman

H&G

18th April 2017

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

By email: futuremedway@medway.gov.uk

Dear Sirs

REPRESENTATIONS TO THE FUTURE MEDWAY LOCAL PLAN 2012-2035 (JANUARY 2017)

These representations are by on behalf of Hepher Grincell, albeit they concern the interests of Gillingham Football Club. They are made in response to the 'Development Options' consultation on the Future Medway Local Plan (January 2017).

Gillingham Football Club was established in 1893 and is based at Priestfield Stadium, Gillingham, which has a capacity of approximately 11,000. The existing stadium, on Redfern Avenue, is located in a predominantly residential area and the site has reached its developable capacity and cannot cater for the future growth plans of the club. Accordingly, the Club is proposing to develop a new stadium, enabled by large scale leisure, retail and residential development. After extensive examination of other options, it has identified land at Mill Hill, Gillingham, for such development. The project will involve the redevelopment of the Priestfield stadium site predominantly with housing.

The Mill Hill site is located 1.5 miles east of Priestfield. Lying between Yokosuka Way, Eastcourt Lane and Grange Road, it is open land used for equestrian purposes. The Mill Hill site area is approximately 16.5 hectares.

Several references are made to the Mill Hill site and the need to relocate the Gillingham FC stadium in the Development Options consultation document. These representations relate primarily to Section 3 '*Delivering Sustainable Development – Options*', and respond to the scenarios presented within and illustrated in appendices 1 B-E.

We do not intend to challenge the vision and strategic options of the Local Plan. We are supportive of Medway's growth plans and encouraged that regeneration is placed at its core. In particular, we support the designation of the Mill Hill site as a 'mixed use development' area in all four of the scenarios presented in appendices 1 B-E.

The proposed relocation from Priestfield Stadium will contribute 2.5 hectares of serviced brownfield land to the Medway Brownfield Register. The Priestfield Stadium site is capable of delivering a substantial mixed-use residential scheme in an existing residential area. The Mill Hill site is located

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Planning and Development Services

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London W1G 8DZ
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on the fringe of the Gillingham urban area and has a site area of approximately 16.5 hectares. Located adjacent to Yokosuka Way, and bordered to the south by the Gillingham to Rainham trainline, the Mill Hill site is capable of delivering large-scale, residential/commercial regeneration on a site that is largely free from environmental constraints, of relatively low agricultural value, and which has good access to road, rail and other infrastructure.

In scenario 1 'Maximising the Potential of Urban Regeneration' section 3.24 states that '*the regeneration area would extend beyond Gillingham to include a modern football stadium for Gillingham Football Club at Mill Hill, supported by a mixed development of apartments, shops and wider leisure facilities. An iconic building would establish the new character of this area and mark the extent of the regeneration zone*'.

Whilst we support the proposed allocation for a new stadium and enabling development at Mill Hill, we believe the plan should go further and that there should be reference to utilising the site's full development potential. It should also identify the potential for a housing-led redevelopment of the Priestfield site.

Section 3.26 identifies a number of risks associated with scenario 1. They include the ability to deliver within the plan period, potential loss of overall employment land supply, and securing infrastructure and services to support growth at this scale. Gillingham FC is confident that it can deliver Mill Hill and Priestfield within the plan period and they are actively pursuing the matter. The proposal does not result in the loss of any employment land; rather, it will generate significant local employment both throughout construction and operation. Both sites are well served by infrastructure that can support the proposed regeneration. Hence, we consider that the risks are very low.

I would be grateful if you could confirm receipt of these representations at your earliest convenience.

Yours faithfully,

Roger Hepher
Director

[redacted]

High Halstow Parish Council

[redacted]

www.highhalstow.org.uk

MEDWAY LOCAL PLAN CONSULTATION RESPONSE

High Halstow Parish Council has considered the consultation document for the Medway Local Plan and has also consulted residents and would make the following comments.

It is recognised that there is a need for housing in the district. However it is considered that brownfield sites should be chosen over farmland/greenfield sites. Much of the farmland is Grade I agricultural land and should be maintained as such and not built on. It is queried whether alternatives have been investigated and whether all potential sites have been explored. In the urban areas higher rise developments could be built to increase the number of housing units. 5,900 houses is too many on the Hoo Peninsula. The Parish Council would want to be involved in scenarios and proposals for planning developments before the consultation stage

The main cause of concern is the pressure on the local infrastructure that this number of dwellings would make. Everyone consulted emphasised that the roads and other facilities must be built first, before people move into the housing. There is already great concern on the Peninsula that the only practical road in and out is the A228 at Four Elms Hill and Four Elms roundabout is already at capacity at peak times. Serious consideration must be given to a solution before thousands of new dwellings are built on the Peninsula. Other concerns are school places, medical facilities, sports facilities, public transport, the local economy and provision of utilities such as water.

In planning housing, there should be a mix, including bungalows. People are opposed to ribbon development and want the green spaces between villages maintained. Roads in new developments should be wide enough to allow some on street parking and more spaces should be made available for visitors, who will also include medical staff and delivery drivers.

It is considered that some brownfield sites should provide local employment. It is believed that many people are working from home and facilities such as studies and fast broadband must be available to allow them to do this. The idea of moving businesses from the Medway City Estate to Kingsnorth was not considered a good idea as it will push even more traffic onto Four Elms Hill and Four Elms roundabout.

The question of a hospital was raised by residents. A suggestion is made that a super hospital is built at Lodge Hill, with the closure of Medway Maritime. Houses could then be built on the Medway Maritime site and not at Lodge Hill. One resident has already written to the Government on this matter.

High Halstow Parish Council would like to see a collective Neighbourhood Plan for the Peninsula, where the complete area is considered as a whole and not just individual villages in isolation.

In summary, the Parish Council realises there is a need for housing and that some will be built on the Peninsula, but has concerns that are expressed above and would like to see as much of the new dwellings as possible provided in the urban areas.

Roxana Brammer
Parish Clerk

[redacted]

From: Bown, Kevin [redacted]
Sent: 06 April 2017 17:10
To: futuremedway
Cc: [redacted]

Subject: Highways England response re Development Options consultation Medway Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sirs

Thank you for consulting Highways England on the above document, seeking a response no later than 10 April 2017.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case with particular reference to A2(west) and M2.

As you will be aware, we have been working with the Council since Summer 2016, advising on the scope and production of the required transport evidence base.

We also attended the Transport Workshop on 21 February, and held a tripartite meeting with yourselves and Kent County Highways afterwards.

To-date we have been generally content with the commitment shown and the work produced. We are particularly interested in the use of the Aimsun modelling software to support the Local Plan given that to-date it has not been commonly used in the UK. However, the plan has been in its earliest stages where the level of detail is naturally insufficient to assess and mitigate the transport impacts. Consequently, we are not in a position as such to either object to or support the Local Plan at this point in time.

In contrast, the next steps which will include

- the issuing of the modelling validation report for assessment,
- production of future development distribution scenarios,
- then forecasting the transport impacts of those scenarios and
- production of necessary scenario supporting mitigation schemes that enable the strategic and local networks to continue to function safely, reliably and efficiently,

will be key to the success and soundness of the Local Plan.

Highways England stands ready to assist as we are able in the assessment of this work.

Once you have digested all the representations received, we would be happy to meet with you to discuss their implications for the work ahead.

I look forward to hearing from you.

Regards

Kevin Bown, Spatial (Town) Planning Manager BSc(Hons) MPhil CMS MRTPI

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | GU1 4LZ
Tel: +44 (0) 300 470 1046
Web: http://www.highways.gov.uk

Safe roads, reliable journeys, informed travellers
Highways England:operating, maintaining and improving the strategic road network in England.

bull, andrew

From: [redacted]
Sent: 26 May 2017 17:27
To: futuremedway; smith, catherine
Cc: Planning SE
Subject: Highways England response re Medway Local Plan - Habitat Regulations Assessment

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sirs

Thank you for consulting Highways England regarding the above document seeking a response no later than 30 May.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN).

The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case particularly the A2/M2 corridor.

Having examined the document, and considered any other material considerations, our comments are as follows:

1. It would be useful to understand the ZOI which has been used to define those plans and programmes taken into consideration within the HRA Screening
2. We note that in Section 2.10, a list of documents referred to is provided, however the Roads Investment Strategy does not form part of this. There are references to the SRN later on within the HRA Screening which is why we would expect to see something in this section.
3. There seems to be some confusion with terminology – sometimes the document is referred to as a HRA Screening and at other times an initial HRA or HRA.
4. Acknowledgement to LTC is given, although only under the Air Quality section. It is noted that “further work is required as part of the supporting evidence for the project development of the LTC to assess impacts on the designated European sites”. It is therefore not clear whether this forms an in combination effect or not? There may also be the potential for LTC to impact upon the European Sites outside of the air quality context, and the potential for this should be considered.
5. It would be helpful to clarify why specific SRN road schemes are mentioned (it seems that this is purely in from an increase in traffic perspective as opposed to physical schemes) whereas local schemes are not specifically mentioned. Is this because reference is made to these in the Local Plan and therefore will be inherent in the HRA Screening outcomes.

I hope that our comments assist.

Should you have any queries, please contact me.

Regards

Kevin Bown, Spatial (Town) Planning Manager BSc(Hons) MPhil CMS MRTPI

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | GU1 4LZ
[redacted]
Web: http://www.highways.gov.uk

Safe roads, reliable journeys, informed travellers
Highways England:operating, maintaining and improving the strategic road network in England.

From: futuremedway [mailto:futuremedway@medway.gov.uk]
Sent: 13 April 2017 16:47
Subject: Medway Local Plan - Habitat Regulations Assessment

Dear all

I would like to inform you that the Habitats Regulation Assessment screening report considering the potential for adverse impacts on the integrity of the European sites that could be affected by Medway's proposed growth as set out in the Local Plan Development Options report has now been completed. I apologise for the delay in the production of this document.

The report will be published on the council's website on Tuesday 18 April and we are inviting comments to be submitted by **5pm on 30 May 2017**. If you wish to submit your representations on the Development Options consultation report and interim Sustainability Appraisal in conjunction with your comments on the HRA, we can accept these as one response to the extended deadline for the HRA consultation on 30 May.

We are also happy to receive representations separately, or accept any updates or additions to your existing representations, should you wish to do so, in consideration of your views on the HRA report.

The council welcomes your comments and advice on the HRA assessment, that can be taken into account in subsequent iterations of the HRA as the Medway Local Plan progresses.

Please note that this is an updated email as my earlier message had the wrong attachment – apologies for any confusion that this may have caused.

Regards

Catherine

Catherine Smith
Planning Manager – Policy
Regeneration, Culture, Environment & Transformation
Medway Council
Gun Wharf, Dock Road, Chatham, Kent ME4 4TR
[redacted]

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Historic England

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

Our ref: PL00015903
Your ref:

Telephone [redacted]
Fax [redacted]
Email [redacted]
Date 7 April 2017

By email only: futuremedway@medway.gov.uk

Dear Sir / Madam

Medway Council Local Plan 2012-2035

Thank you for your email of 17 January 2017 inviting comments on the above document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process and welcomes the opportunity to comment upon this key planning document.

Historic England's comments are set out detail below.

Historic England would strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 126).

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

Yours sincerely

[redacted]

Alan Byrne
Historic Environment Planning Adviser

The following comments reflect the format and sequence of the draft Local Plan and largely follow the order set out in the document.

Section 1 Introduction – Historic England supports the purpose of the draft Medway Local Plan to achieve sustainable development (in para 1.1), not least in meeting the environmental obligation to contributing to protecting and enhancing the natural, built and historic environment (para 1.3). As noted in para 1.4 this would include avoiding or restricting development that would have a harmful impact on the, inter alia, historic environment and heritage assets; this would be in accordance with NPPF 157 bullet seven.

However, the Local Plan is expected to go further than this by providing a positive strategy for conserving and enjoying the historic environment and, in particular, to address the needs of heritage at risk (NPPF para 126). More detailed comment on this is set out below.

Para 1.8 of the draft Plan relates to evidence gathering and the provision of an evidence base. In our letter of 29 February 2016 in response to the Issues and Options Consultation document we set out in some detail guidance on preparing an evidence base for the historic environment that would support appropriate policies in the Local Plan. We are disappointed that there is, at this stage, limited indication that such an evidence base is in place or is being prepared given the lack of reference to such in the list of evidence documents in para 1.8, and on the Evidence Base page of the Medway Plan website. Providing a list of listed buildings and conservation areas and a link to a map of heritage assets is insufficient as an evidence base and does not meet the requirement of NPPF para 169 to have "up-to-date evidence about the historic environment… and use it to assess the significance of heritage assets and the contribution they make..". Without this evidence it is unlikely that the policies in the plan can be demonstrated to be robust and well-founded, and the Local Plan may be found to be unsound at Examination.

We broadly welcome the Vision for Medway set out on page 15 in Section 2: Medway 2035 - Vision and Strategic Objectives for the Local Plan, particularly the positive references to the historic environment, heritage assets, character and distinctiveness. The achievement of the Vision and the ambition that underpins it will depend on ensuring there are robust policies in place for protecting and enhancing these attributes while also providing appropriate opportunities for regeneration and growth.

In our view, para 2.35 is key in establishing the direction of travel for regeneration and growth in Medway, putting the focus clearly on directing development to sustainable locations while ensuring local character is respected. We understand, however, that achieving such a balance is not straight forward and expect to see policies in the Local Plan that will ensure that the requirement to protect *and enhance* the historic environment are not subsumed by the policies that promote growth and development.

As a point of principle Historic England would support the priority use of vacant and underused brownfield land for new development as set out in the discussion on delivering sustainable development options in Section 3 Delivering Sustainable Development – Options. This is an objective of government policy as set out in NPPF. This may not be entirely without implications for the historic environment, however, as much of this land may have historical and archaeological value, e.g. as evidence of former industrial or military uses, that may be of such significance that it would need to be safeguarded. It is important, therefore, that there is

a good understanding of the land and sites identified for development to allow for these significances to be taken into account in planning and designing future uses for them. This is where a robust historic environment evidence base will be essential to inform the choices that are made for building appropriate and sustainable forms of development.

The possible requirement to go beyond reuse of brownfield land and to develop on greenfield sites is noted (para 3.9); given the assessed need for development and the ambitious growth projection for Medway some development outside the urban cores will be very likely. Once again, the need to fully understand the implications this may have for the historic environment, such as impact on heritage assets and their settings, changes to existing character and, intrusions on views and open spaces should underpin any decisions on which sites to allocate and how they should be developed. While natural and landscape designations as possible constraints are identified (para 3.11) it is not clear that the same weight would be given to protecting historical assets, such as scheduled monument and registered parks and gardens, when suitable land is allocated for development; we think this should be made clear.

The points above are relevant to all four 'Scenarios' for strategic development set out in pages 22-27 of the draft Plan. Historic England would not, at this stage, wish to identify what it considered a preferred scenario because not all the implications for the historic environment could be fully understood. It is likely, in our view, that each one will have effects on the heritage and character of Medway and the scale and extent of these would need to be assessed prior to a preferred option being selected. We would anticipate greater potential for harmful impacts from development outside the main urban areas and on the Hoo Peninsula, which has a unique and extensive heritage of great significance (ref. *The Hoo Peninsula Landscape* report (HE, 2015) - https://content.historicengland.org.uk/images-books/publications/hoo-peninsula-landscape/hoo-peninsula-landscape.pdf/.)

In general terms, maximising urban regeneration would allow a focus on the City Industrial Estate and could be an opportunity to ameliorate the poor current state of this site and its intrusion into views of the River Medway from Rochester and, in particular, the relationship with the Historic Dockyard opposite the site in Chatham.

Several of the scenarios include expansion at Hoo St Werburgh, which although not a Conservation Area and with few listed buildings, has archaeological significance from the possibility of a Saxon nunnery in the area (ref. *Hoo Peninsula Landscape Study* for context). A detailed character assessment for Hoo St Werburgh was not undertaken as part of the Hoo Peninsula study but this should carried out as part of the evidence base for the plan if the option of significant development at this location is likely to be pursued.

A potential new settlement at Lodge Hill has been considered for some time and HE's views on it are well known to the Council. Depending on the outcome of the appeal in early 2018 then there could be more pressure on the Hoo Peninsula to take more alternative development if it cannot be accommodate in the main urban areas; if this scenario becomes a likely one we would wish to see a comprehensive assessment of the effects on the character of the Hoo villages and landscape.

The process of refining the scenarios and identifying the most appropriate sites to develop may be helped, in terms of understanding the relevance of the historic environment by

reference to *The Historic Environment and Site Allocations in Local Plans - Historic England Advice Note 3* - https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/.

This advice note sets out some guidance on the site selection process which needs to be detailed enough to:

- Support the inclusion of appropriate sites for development or regeneration (including those which could enhance the historic environment), or;
- Justify the omission of a site where there is identified harm, and;
- Set out clear criteria for sites that are acceptable in principle, within which they can be appropriately developed in terms of impact on heritage assets, for example, its size, design, or density.

It is important to understand the significances of any heritage assets that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge of impact is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area or potential World Heritage Site) may offer opportunities for enhancement or tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms.

The NPPF sets out in various different places a number of requirements for Local Plans in respect of the historic environment. The need for a robust evidence base has been mentioned above, but Local Plans also need to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 126 and 157), and contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 156).

A positive strategy in the terms of NPPF paragraphs 9 and 126 is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

This strategic approach can inform all aspects of the planning system by recognising and reinforcing the historic significance of places. As part of a sound conservation strategy, policies for local housing, retail and transport, for example, may need to be tailored to achieve the positive improvements in the historic environment that the NPPF expects (NPPF, Paragraph 8). Conservation is not a stand-alone exercise satisfied by stand-alone policies that repeat the NPPF objectives. Consequently, the Medway Local Plan might need to consider the inter-relationship of the objectives for the historic environment with its topic-based policies policy approaches.

Section 4 Housing - delivering a wide choice of high quality homes could to some extent be achieved by encouraging the adaptive reuse of historic buildings. New residential

developments may best be integrated into historic areas if there are design criteria or guidance available in local plan policies.

Section 5 Employment - building a strong, competitive economy could be supported in the draft Plan by specific policies to conserve and enhance the quality of the historic environment in order to encourage heritage-led tourism, help create successful places for businesses to locate and attract inward investment into areas such as Chatham and Rochester. The draft Plan could identify and promote further opportunities for heritage-led regeneration, such as at the Historic Dockyard. In terms of supporting a prosperous rural economy, the reuse or adaptation of traditional buildings provides opportunities for supporting the rural economy or providing homes for local people.

In Section 6 Retail and Town Centres ensuring the vitality and attractiveness of town and village centres can be supported by maintaining the character and distinctiveness of the historic environment so that it becomes a unique selling point that distinguishes a location from others. Rochester has particular qualities in this respect but other centres may equally be able to capitalise on their specific local character and distinctive features.

Conserving and enhancing the natural environment in Section 7 Natural Environment and Green Belt should include specific reference to protecting and enhancing important historic landscapes. As demonstrated by Historic England's *Hoo Peninsula Landscape Study*, the natural and historic built environment are closely bound up and this section could identify what contribution the strategy for improving the Green Infrastructure network could also make to the enhancement of the area's heritage assets.

The policies for Protecting Green Belt land should reflect one of the key purposes of the designation to protect the special character and setting of historic towns and villages and the definition of its boundaries should be tailored to help achieve this. The landscape and character of the Kent Downs AONB is of course special and unique in large part due to the historic land use and activities of the area and the legacy of these in terms of built structures and landscapes should be acknowledged in the Policy Approach to Landscape (p 66).

In this section also, meeting the challenge of flooding and coastal change may require flood prevention measures be provided which could also safeguard the heritage assets in locations such as the Chatham and Rochester riverfronts, and the Hoo Peninsula (e.g. at All Hallows).

It is appropriate to make the connection between existing character with good, new high quality design in Section 8 Built Environment by requiring the defining characteristics of each part of the plan area be reinforced in the approach to designing new development, including housing.

Historic England does, of course, endorse the inclusion of strategic policies for the conservation of the historic environment in the draft Medway Local Plan as the plan will be the starting point for decisions on planning applications, and neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan (NPPF, Paragraph 184). Consequently, sustainably managing the historic environment is best achieved by identifying clear strategic policies for heritage in order to assist those preparing neighbourhood plans, and those considering the location and form of development.

By promoting sustainable transport in Section 11 Sustainable Transport new roads and other transport infrastructure could be delivered in a manner which also conserves the historic environment of the areas that are affected by them. The introduction of sustainable transport initiatives may offer related opportunities for heritage through improving street/traffic management or public realm enhancement at the same time. Enhanced use of the River Medway offers the potential to reuse or recast historic wharves and piers for a sustainable modern use, and to support tourism development linked to waterfront and other land-based heritage sites, e.g. the Historic Dockyard at Chatham and Upnor Castle.

Section 12 Minerals, Waste and Energy – the policy approach should address how might any impacts of mineral development on an area's heritage assets, particularly archaeology, be controlled to acceptable levels, and how minerals extraction may improve archaeological knowledge through approved mineral operations. The plan could identify and safeguard potential sources of local building and roofing stone for historic building repairs and maintenance, supplies of which are increasingly difficult to acquire. Further advice on facilitating the sustainable use of minerals is available in *Mineral Extraction and Archaeology: A Practice Guide* (English Heritage on behalf of the Minerals Historic Environment Forum, 2008) - https://content.historicengland.org.uk/images-books/publications/mineral-extraction-and-archaeology/mineral-archaeology.pdf/.

It is important that the approach to energy provision, including the strategy for renewable energy developments and associated infrastructure, identifies and reduces as far as possible the potential harm to the historic environment, whether this is solar panels on individual historic properties or wind farms in the historic environment – you may find the advice on the Renewable Energy pages of the HE website of use in defining the approach to this matter: https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/.

Historic England

Planning Policy Team
Planning Service
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by email only to futuremedway@medway.gov.uk

Our ref: PL00075806
Your ref:

Telephone [redacted]
Fax [redacted]
Email [redacted]

Date 07 April 2017

Dear Sir / Madam

Medway Local Plan 2012-2035 Sustainability Appraisal Scoping Report

Thank you for your email of 17 January 2017 inviting comments on the Scoping Report for the above strategic environmental assessment.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

Historic England is a statutory consultation body in relation to the SEA Directive. However, due to high volume of consultations being received in respect of the Directive, Historic England has prepared generic guidance with regards to our involvement in the various stages of the assessment process. This is attached as an annex to this letter.

This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.

Yours sincerely

[redacted]

Alan Byrne
Historic Environment Planning Adviser

Scoping

The scoping stage is intended to set the context against which the likely effects of the plan in question can be measured. To do this, it is necessary to identify the scope and level of detail of information to be included in the final SA or SEA report. This should be proportionate to the type, purpose and level of plan under consideration.

The intention is to identify the key characteristics of the area in question, other initiatives likely to be having local impacts and to develop a mechanism to be able to forecast the likely effects of the plan, together with information relating to the current situation in order to assess this. A scoping report usually therefore :

Identifies other relevant policies, plans and programmes and sustainability objectives – this may include various pieces of legislation or international conventions depending on the location in question

- Collects baseline information to establish current situation
- Identifies sustainability issues and problems, including threats and opportunities for the historic environment
- Develops the assessment framework
- Consults the statutory consultation bodies (Environment Agency, Historic England and Natural England) on the scope of the report

These are addressed in turn below.

Review of relevant plans, programmes and policies

The review of related plans, programmes and policies will vary depending on the specific circumstances and the type of plan being assessed in order to be proportionate. Those with content or sections potentially relevant to the historic environment include:

International/European

UNESCO World Heritage Convention

European Landscape Convention

The Convention for the Protection of the Architectural Heritage of Europe

The European Convention on the Protection of Archaeological Heritage

National

Planning (Listed Buildings & Conservation Areas) Act 1990

Ancient Monuments & Archaeological Areas Act 1979

Marine and Coastal Access Act 2009

National Planning Policy Framework

National Policy Statements

Local
Local Plans

Marine Plans

National Park/AONB Management Plans

Heritage/Conservation Strategies

Other Strategies (e.g. cultural or tourism)

Conservation Area Character Appraisals and Management Plans

WHS Management Plans

Baseline information

The establishment of a robust and comprehensive baseline will assist in demonstrating a proportionate evidence base for the plan in question, as well as help to strengthen its case for soundness when subject to examination. Baseline information that describes the current and future likely condition of the historic environment in terms of its significance, sensitivity and capacity to accommodate change can also help identify areas of particular sensitivity to development, sustainability issues, predict and monitor likely effects and in identifying alternative solutions. Good Practice Advice note 1 contains advice on relevant sources of evidence.

Evidence gathering is a central part of local, marine and neighbourhood plan preparation and formulation, and assembling information on the historic environment for an SEA/SA should not normally entail additional work. Where Councils do not currently have a sound evidence base available relevant to future challenges and opportunities, they may need to consider augmenting this so that the SEA assists the smooth progress of the plan. In assessing the likely effects of the plan and analysing baseline information, there may also be a need to look at this in relation to a wider geographic area and across administrative boundaries. This may be in relation to traffic generation or setting issues, the duty to cooperate for local planning authorities or neighbouring state administrations in the case of marine plans.

Identifying sustainability issues and problems

Consideration of the current condition of heritage assets and any related observable trends can help in drawing conclusions as to the likely environmental trajectory without the plan and how this might change should it be adopted. Additionally, analysis of a range of baseline information appropriate to the type and level of plan can help identify sustainability issues relating to the historic environment. These might include:

- Heritage assets at risk from neglect, decay, or development pressures;

- Areas where there is a threat or likelihood of further significant loss or erosion of landscape/seascape/townscape character or quality, or where development has had or potentially may have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it

- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

- Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings

Conversely, there may be some opportunities for the historic environment revealed by the process, such as

- Delivering heritage-led regeneration and supporting the vitality and viability of town centres
- Developing a stronger sense of place and local distinctiveness by informing design

- Promoting the innovative reuse of the existing building stock and addressing heritage at risk

- Promoting heritage based tourism

- Achieving appropriate climate change resilience

- Improving awareness, involvement, and understanding of the historic environment

- Encouraging traditional building and craft skills development and using the historic environment as an educational resource

Developing the SA/SEA framework

The appraisal framework is the method by which the likely effects of the plan on the local area are assessed and measured. It does this through setting out the objectives of the SA/SEA assessment, together with the decision-making criteria and indicators (see paragraphs 2.12 to 2.17) to be used to assess the degree to which the plan is likely to achieve these. In developing the framework, appropriate heritage expertise is valuable in ensuring that the application of the framework to the historic environment is most effective.

The inter-relationship between the historic environment and other areas to be tested by the framework can be reflected in the objectives. Sustainable development (the over-arching principle of the NPPF and the UK MPS) requires an integrated approach and therefore where the historic environment clearly underpins the character, economy or cultural resource of a place, it may warrant inclusion in other objectives such as regeneration, tourism, access to services, quality of life, landscape and townscape. This can be particularly true where there are areas of inter-relationship, for example between the historic environment and economic development.

Additionally, a separate and specific objective relating to the historic environment may help avoid the masking of adverse impacts through blending several topics together in one objective (e.g. historic environment and landscape).

The objectives of the SA/SEA assessment are not fixed by the EU Directive, and are often derived from environmental protection objectives identified in other plans and programmes or from the review of baseline information. The responsible authority can adapt these to take account of local circumstances. Recognising that the number of objectives needs to be manageable, the list below represents a selection where consideration of the historic environment may improve the effectiveness of the framework:

Environmental Objectives

- Protect, enhance and manage the character and appearance of landscapes/seascapes/townscapes, maintaining and strengthening local distinctiveness and sense of place
- Protect, manage and improve local environmental quality
- Achieve high quality sustainable design for buildings, spaces and the public realm

Social Objectives

- Improve and broaden access to the local historic environment
- Provide better opportunities for people to understand local heritage and participate in cultural and leisure activities

Economic Objectives

- Foster heritage-led regeneration and address heritage at risk
- Optimise the use of previously developed land, buildings and existing infrastructure
- Promote heritage–led sustainable tourism
- Support the sustainable use of historic farmsteads

Decision-making criteria

The criteria for decision-making will be related to the type and level of plan or programme under consideration, as well as the characteristics and environmental sensitivity of the area in question. Tailoring each SA/SEA in this way will help ensure that key heritage issues are incorporated in the framework and that likely effects on the historic environment are properly assessed. Examples of appropriate criteria include

Environmental: will the policy or proposal

- Conserve and/or enhance heritage assets, their setting and the wider historic environment?
- Contribute to the better management of heritage assets and tackle heritage at risk?
- Improve the quality and condition of the historic environment?
- Respect, maintain and strengthen local character and distinctiveness?

- Promote high quality design?
- Integrate climate change mitigation and adaptation measures into the historic environment sensitively?
- Alter the hydrological conditions of water-dependent heritage assets, including organic remains?

Social: will the policy or proposal

- Increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment?
- Improve the satisfaction of people with their neighbourhoods as places to live?
- Engage communities in identifying culturally important features and areas?
- Provide for increased access to and enjoyment of the historic environment?
- Provide for increased understanding and interpretation of the historic environment?
- Provide new leisure, recreational, or cultural activities?
- Support and widen community uses through shared facilities?

Economic: will the policy or proposal

- Increase the economic benefit derived from the historic environment?
- Promote heritage-led regeneration?
- Lead to the repair and adaptive re-use of a heritage asset and encourage high quality design?
- Make the best use of existing buildings and physical infrastructure?
- Promote heritage based sustainable tourism?
- Ensure that repair and maintenance is sympathetic to local character?
- Help to reduce the number of vacant buildings through adaptive re-use

Indicators and monitoring

The selection of indicators for the historic environment may vary at different stages of the assessment process. State of the environment or contextual indicators are most likely to be useful in informing the baseline analysis. The datasets included in Heritage Counts may be useful in looking at the comparative range, importance and condition of heritage assets and

identifying possible objectives, trends and targets. A simple list of the number of designated heritage assets is unlikely to produce the most helpful baseline analysis.

For the later assessment or monitoring of the significant effects of a plan, indicators which will clearly demonstrate the impact(s) of the plan on the historic environment are more likely to be useful in giving an accurate picture of the potential impacts. Factors to bear in mind include ensuring

- the indicators clearly relate to the appraisal process, such as the accompanying objectives/ sub-objectives (decision-making criteria), the baseline for the historic environment, and any identified effects and proposed mitigation measures
- the indicators are appropriate and relevant to the scale of the plan under consideration
- the indicators address positive and negative effects
- consideration is given to cumulative, secondary and combined effects;
- use is made of both qualitative and quantitative data
- the indicators are kept under review as new data sets become available and or new issues are identified
- accompanying targets are included

Selecting indicators which are directly linked to SEA/SA objectives is a complex process but a robust monitoring framework for the historic environment must be included to meet the requirements of SEA/SA in terms of

- identifying any unforeseen adverse effects of implementing the plan and enabling appropriate remedial action to be taken
- testing the accuracy of predictions made in the appraisal and improving future practice;
- determining whether the plan is contributing to the achievement of the desired objectives and targets for the historic environment
- checking the delivery and performance of mitigation measures

SA/SEA is the principal tool for monitoring the effects of the plan in operation. Monitoring is intended to identify unforeseen adverse effects and enable appropriate remedial action as regards the plan's implementation. For identified significant effects on the historic environment consideration could also be given to identifying:

- the criteria or thresholds for remedial action;
- the type of remedial actions that could be taken, for example reviewing the relevant policy or implementing additional mitigation measures; and
- the responsibility for taking the action.

Responsible authorities are required to consult the statutory consultation bodies (including Historic England) on the proposed scope and level of detail of the SEA.

MEDWAY Local Plan

[redacted]

Dear Sir/Madam,
After having studied the Development Options, I wish to inform you of my opinion.

Firstly, I wish to make it known that as far as am concerned the Medway Towns is now at breaking point. We cannot cope with the current population, let alone adding to it!
The reasons are:-

1) Medway Maritime Hospital is unable to cope now as you are well aware - it is already not large enough to support the current population. Even if another hospital is built, where will all the new nurses and doctors come from?
2) It is fine to say you will provide new Doctors Surgeries, but I have no idea where these new doctors will appear from - a number of local surgeries are already struggling to cope as doctors leave, retire etc. and there aren't enough new doctors coming through to replace them. My surgery, Kings Family Practice, in Chatham has a notice saying they are struggling to replace doctors and are currently shut Thursday afternoons so to say that doctors should work longer hours is not practical or possible at all.
3) We will need new transport links which I don't believe you can actually provide - new roads that will cut a swathe through the little countryside & green belt we have left.
Also public transport isn't up to scratch; there is nothing done to encourage people to use it & consequently there aren't good enough

Services funded anyway.

4) The number of houses supposedly needed will mean, in general, twice that number of cars added to our roads - where is this traffic all to go? Where will everyone park? The roads are clogged up now with cars and people struggle to park.

5) Gas, electricity & water:-
How will you be able to sustain the extra supplies that will be needed to provide for the thousands of houses you intend to build? Over the last few years our water table has been of concern and we are already conserving water.

6) Schools:-
How can you possibly guarantee that even if you build more schools, you will be able to provide the teachers needed?

Now- Concerning your Development options:-
I do not approve of scenario 2, 3 or 4 as these all mention Lodge Hill, Chattenden, and as Lodge Hill is an SSSI - your plans defy national planning rules for protected wildlife sites as well as destroying the Nightingales last stronghold in the U.K.
The R.S.P.B, KWT, Friends of North Kent Marshes Medway Countryside forum, Butterfly Conservation & Woodlands Trust all oppose development at Lodge Hill. As our Council you should be thoroughly ashamed of the fact that you have even put this on your agenda and are trying to destroy the S.S.S.I status and have taken it to the Government - I now

have no trust in you as my local council because of this.

There are other factors in Scenario's 2, 3 & 4 that I disapprove of, namely regarding loss of Green Belt land, which we should not be able to build on.

This only leaves Scenario 1.

I have to consider that of the options you have given, this, IF I had to choose an option, would be the least destructive to firstly wildlife (ie. does not include Lodge Hill) and not so much Green Belt land would be taken and more Brownfield Sites would be used.

My big question is - if you do not get approval to build at Lodge Hill, there appear to be no options but one left anyway - do you know something that we don't?

Finally, I wish to state that I am extremely worried about the need to build all these new houses as not enough will be affordable - the percentage is too low. All that will happen is that people from outside Medway will buy them and also will probably be put up for rent. Our younger generation have been sold down the river - they cannot get on the housing ladder as houses are ridiculously extortionate to buy and they need a large deposit and wages are low but renting is so expensive that they cannot then afford to save for their own property!

I believe the Majority of the housing should be affordable and for local people only and we should also have Council Housing as we used to do until they all disappeared in the 1980's.

It seems to me that the young people of Medway will still be left in the same position, while outsiders gain all the benefits.

Yours faithfully

[redacted]

Ms. Holly Puttock

06 MAR 2017

Hoo Saint Werburgh Parish Council

(Chairman: Cllr John Tildesley)

[redacted]

Te

Planning Policy Regeneration,

Culture, Environment and Transformation

Medway Council,

Civic Headquarters,

Gun Wharf,

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Date: Feb 2017

Ref: New Local Plan Consultation Document

Hoo Parish Council.

Comments on the Medway Council

Draft Local Plan 2012-2035

Vision

The document mentions establishing a vision to drive economic success at the same time as addressing inequalities. Whilst not denying that careful planning may have to be sought to achieve that vision however accommodating sustainability of the Hoo Peninsula for example must avoid harm to its natural environment of which folk are attracted. It has to be acknowledged that protecting the best of Medway's heritage and its natural environment is of paramount importance to the people it attracts. The Peninsula is not such that major change can take place without some consequence for its historic character and the way that character benefits the folk it accommodates.

Strategic Issues

The expansion of the Medway Towns to meet the Employment and Housing targets set out in the Government Objectives cannot be reached, or not even started, no matter which of the set out four scenario's is finally adopted, unless there are major and immediate consideration, planning and implementation of improvements to the transportation links and health services across the whole area.

The roads are gridlocked, the train services are overloaded and erratic, GP's surgeries are overflowing and the major hospital in the area is struggling to meet the needs of an expanding population, which exceeds by hundreds of thousands the number it was designed for. Each improvement made is just papering over the cracks for the short term gain.

Scenario 3: A Rural Focus.

The scenario, if approved would permanently destroy an area of valuable countryside. The scenario identifies Hoo St Werburgh as a focus for growth, expanding the village into a rural town. Principle expansion would be set outside the existing village envelope of Hoo village, but is within the parish of Hoo St Werburgh, and would join together the settlements of Hoo, Chattenden, Deangate and Lodge Hill, and reducing the green belt buffer zone between the peninsula and the spiralling developments of Strood and Wainscott , damaging the character of each of these local communities and riding roughshod over the

wishes of significant numbers of taxpayers/local residents who wish to protect the countryside and the semi-rural environment.

The application, if approved, would signify a serious and continued over-development of the village of Hoo, and the wider Hoo St Werburgh Parish. Following mass over-development on land located East of Bells Lane, where no additional infrastructure was or has been provided, which has seriously impacted on the villagers as a whole, these further developments would be a development too far.

With regard to accommodating a level of future growth making Hoo into more of a 'Market Town' rather than a village may be a step too far. Again it is mentioned that a larger scale of planned growth would come with improvements to existing facilities and provision of new – that did not really happen during the old plan and our members are sceptical with the suggestion that it will happen within the new plan. There is also much concern where it is mentioned 'there is scope for freestanding settlements on the Hoo Peninsula'.

This application, if approved, would add a greater burden of road traffic on the already busy Four Elms Hill, Main Road and other approach roads. The roads in this area have long been unable to cope with traffic levels at certain times. In particular there have been numerous near misses in Main road in the vicinity of the Secondary school and this will be exacerbated by the on-going development of the new Primary School on the site, which is already needed to cope with the increased population.

If successful the application would result in thousands of additional car journeys each day, including the current and projected commercial vehicle movements from industrial areas at the Isle of Grain, Kingsnorth, and the numerous farming and storage outlets across the Hoo peninsula. Four Elms hill is the only main access route for residents in the villages of Chattenden, Hoo, High Halstow, Stoke, St Mary Hoo, Allhallows and the Isle of Grain.

The only access and egress to the Hoo Peninsula the **A228 at Four Elms Hill** which has not seen any improvement since it was duelled, even though many hundreds of dwellings have been allowed to develop over the last few years on the Peninsula and especially in Hoo. Even the 'Sharnal Street Bypass' was privately funded by business. **Four Elms Hill is the gateway to the Peninsula** and when it is closed (which is quite often) the Peninsula is closed to the outside

world. With regard to accommodating a level of future growth making Hoo into more of a 'Market Town' rather than a village may be a step too far. There is also much concern where it is mentioned 'there is scope for freestanding settlements on the Hoo Peninsula'. Further along its length, the A228 Peninsula Way reverts to a single carriageway road, which is a source of a considerable number of serious road traffic accidents, and the plans to create employment opportunities at Grain and at the Kingsnorth Power Station sites will increase the amount of road traffic, especially HGV movements on this road.

The proposed development scenario will destroy valuable agricultural land, with the uncertain future facing the proposed farming community and the country's population following the Brexit vote, and the demise of the Common Agriculture Policy, if it becomes necessary for the country to produce more food, this land becomes increasingly important, as once built upon it cannot be recovered.

Over-development of the Hoo Village in recent years has resulted in capacity problems at the local primary school, GP provision, (one of the two GP surgeries in the village has recently closed registration to new patients), dentistry services, general community facilities and local roads. The utility services are stretched to breaking point and beyond, on occasions with sewage removal being a particular problem at times, resulting in difficult problems for some residents which the Water Company have failed to solve. The existing Ancient Watercourse, (known as the Brook), which runs through the village is running at higher levels due to increasing rainwater run-off, as a result of development with inadequate drainage provision, this has resulted in occasional flooding at periods of continuous/heavy rainfall. The increased flow is resulting in serious erosion of the river banks, which the Parish Council is having to resolve with expensive repairs.

Finally, I would urge that the desire of the villagers to remain separate from the main conurbations of the Medway Towns should be respected and the creeping urbanisation halted.

Signed. 

John Tildesley.

Chair Hoo St Werburgh Parish Council

HUME

PLANNING CONSULTANCY

Representations to the Medway Local Plan

Regulation 19 Stage

Prepared on behalf of the Attwood Family by Hume Planning Consultancy Ltd.

April 2017

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Contents:

1 Introduction

1.1 These representations are submitted on behalf of the Attwood family whose landholding amounts to 407 hectares of land (part of which is already consented) that forms a corridor between the built up areas of Lordswood and Hempstead and includes the Darland Valley. The sites are identified on the attached plan and is a unique opportunity because of the;

- Extent of the landholding and the ability of the family to develop a comprehensive master planned proposal and then allow the later phased release of development areas over the lifetime of the plan period, combined with;

- The land is in single ownership and will not therefore involve complicated land assembly that can affect land use decision taking and lead to later valuation disputes that can cause delays in housing delivery. The promotion of the site direct by the landowner also allows a flexible development framework to be created via the master planning and plan promotion process. This direct relationship with the single-family landowner also increases the prospects of more land value being captured by the planning process.

1.2 These two factors create a unique spatial land use opportunity because of the land coverage of the Attwood family in this land corridor and the family's willingness to take a longer term view of the phased growth of this area in tandem with infrastructure delivery and in accordance with an agreed master planned vision framework.

1.3 This combination of factors which is unique for Medway offers certainty about a clear delivery timeframe for this phased expansion of the urban area.

1.4 The above combination of factors is unique to this opportunity and are an important context before the comparative land use merits of this growth option are examined in greater detail. The importance of these points is enhanced because of the poor track

record of delivery in Medway which must be significantly "stepped up" if the objectives of the plan are to be achieved.

2 Development Targets and Delivery

2.1 The Medway Local Plan is underpinned by the need to accommodate growth for 3 main land use components over the plan period;

1. 29,643 homes;
2. 89 ha of employment land;
3. 34,900 m sq. of retail (comparison) and 10,500 m sq. retail (convenience).

2.2 The Attwood Family firstly acknowledge that the draft Medway Local Plan has been 'positively prepared' in the sense of meeting the Objectively Assessed Need and seeking to plan for the accompanying retail and employment growth targets.

2.3 These representations, instead focus on a key 'test of soundness,' namely that the draft plan is "justified" in that it represents the most appropriate strategy when considered against "reasonable alternatives". These representations identify certain aspects of the draft Medway Local Plan and the accompanying Sustainability Appraisal work, that it is considered, will unduly influence spatial choices and should be corrected at this point to avoid later 'test of soundness' issues.

2.4 Housing delivery in Medway has been significantly short of the annualised requirement as demonstrated by the annual completion table below;

2001-02 603 dwellings

2002-03	676
2003-04	735
2004-05	646
2005-06	530
2006-07	591
2007-08	761
2008-09	914
2009-10	972
2010-11	657
2011-12	809
2012-13	565
2013-14	579
2014-15	483
2015-16	550

The average completion rate is 671 dwellings per annum over the last 15 years.

2.5 Meeting the draft plan housing requirement of 1281 dwellings per annum will therefore require a “step change” in delivery. This is emphasised by the housing trajectory set out in the Sustainability Appraisal Scoping Report which projects annual housing completions to rise to;

2018-19	1242 dwellings
2019-20	1340
2020-21	1432

2021-22	829
2022-23	775

2.6 These anticipated completion rates are clearly a “step change” in housing delivery and it is unrealistic that this level of development will be achieved without a plan led system in place. The Local Development Scheme (LDS) anticipates that the Submission Stage of the draft Local Plan will occur in the Spring of 2018 with adoption of the MLP in 2019. This looks optimistic given the prospects of an Interim Report and the likelihood that a decision on the Lodge Hill application will not be issued until 2019. It is contended that 2020 is likely to be a more realistic timetable for plan adoption, as a best case, if highlighted issues of the SA are addressed. This timeframe creates a planning policy vacuum over the next 3 years where speculative applications will be promoted.

2.7 Given the current lack of 5-year housing land supply in Medway, which has been described by recent appeal Inspector’s as “parlous” (Medway have recently suggested their own best guess would be 2.21-2.79 years’ supply), there is the potential for the emerging local plan to have to “retrofit” appeal decision results and speculative proposals that are considered in isolation i.e. outside the local plan process.

2.8 If Medway is to have the best chance of adopting a “sound plan” at the earliest opportunity then the building blocks of the plan (considered below) must be solid. If not the anticipated policy vacuum is likely to be extended because the plan will not be adopted and “planning by appeal” will continue to prevail and dominate spatial land use decision making …. this is not plan- led decision making. This is considered a critical point that is relevant to the comments on the representations on the SA and specifically the role of Lodge Hill (addressed below).

2.9 The concerns about the housing land supply pipeline explain the need for early delivery to be at the heart of the spatial decision making. It is important to stress this principle since the options that include major expansion of small rural villages or new settlements will require major upfront infrastructure to be provided (ahead of house sales) this increases investment risk and impinges on land values and viability. This combination of factors in practical delivery terms alone (before other spatial considerations such as transport

impact/environmental and social benefits are taken into account) should be elevating the 'urban extension' above other options because of the Medway context and the need to address housing delivery very rapidly. The urban extension option which can more easily upgrade existing infrastructure nearby, and specifically the Attwood family landholding because of its single-family ownership, can come forward to address this immediate housing crisis in Medway quicker than any other spatial option.

2.10 Some of the notable land use benefits of the urban extension option align very closely with key stated objectives of the draft plan including;

- Connections to existing infrastructure;
- Assimilation with the local community and promotion of social inclusiveness;
- Impacts of, for example, transport improvements can be felt over a wider area to the benefit of the existing nearby community which is not possible at more remote locations.

2.11 In addition, the urban extension spatial option, because of its geographical location relative to the surrounding urban areas and land ownership factors, is also considered best placed to ensure;

- Housing delivery
- Accessible and ability to manage travel demands
- Supports town centre vitality and viability;

This puts the urban extension spatial option ahead of competing opportunities although this is not reflected in the current weighting of the SA.

3 Emerging Urban Extension Proposal

3.1 The master planning of the total landholding of 407 ha identified within the red line boundary of the Attwood family (Drawing No 001) is currently undergoing refinement and will be the subject of further discussion with Medway officers and local consultation with the wider community. The proposal could include;

- Up-to 4500 dwellings at an average density of 40 dph including self/custom build housing;
- Up-to 20 hectares of employment land for a business park situated close to the motorway within a quality landscaped framework;
- A new secondary school on a site of not less than 9ha in area;
- 2 x 2FE primary schools each located on individual land parcels of up-to 1.75ha
- Community and other health facilities
- An extension to the existing country park and public open space/green network and creation of allotments and biodiversity improvements. The anticipated developable portion of the site equates to less than 38% of the total landholding. Such a comprehensive approach for the whole of the corridor over the lifetime of the plan provides certainty for the local community.
- Cycleway and footway links with the existing network;
- Major transport links including the extension of the North Dane Way to connect with an improved Junction 4 to the M2 motorway, close to a park and ride node which is already in operation.
- Investment in fast link bus connectivity to the central areas of the Medway towns.

Advantages of Urban Extension Options

3.2 In addition to the referenced accessibility benefits of an urban fringe location and its proximity to a large residential catchment and the existing services and infrastructure, there are other unique benefits of this development option which are not comparable with more isolated rural locations.

3.3 Firstly, whilst it is not the requirement of planning development to rectify existing shortcomings in infrastructure, the proposed master planned provision of primary and secondary school sites, transport and public open space provision will benefit not only the prospective future occupiers but the existing community. This is not the case for more isolated development. This benefit was recognised by the Secretary of State when considering the recent Gibraltar Farm appeal (paragraph 22). This point is of greater relevance given the proximity of this land corridor to some of the most deprived wards in the south east region.

`Addressing Social Exclusion

3.4 50% of the total population growth in the plan period for Medway derives from the over 65 age bracket. The draft Plan recognises that it is important that older people feel valued and supported in communities. This is reinforced at paragraph 69 of the NPPF which acknowledges; “The planning system can play an important role in facilitating social interaction and creating healthy inclusive communities.”

3.5 Creating a strong and inclusive community is dependent on a high degree of accessibility which will not occur to the same degree in the more peripheral rural options or new settlements. A “sense of place” and sense of community are more likely to be achieved from an urban location that is surrounded by an existing community, particularly if improved infrastructure and job creation is being delivered alongside the housing. This will not occur to the same extent for an isolated expansion of development where self-containment will be the principal design driver.

Addressing Inequality and Deprivation

3.6 Related to social inclusion is the level of inequality that is evident across and within wards of Medway. Medway contains 32 neighbourhoods ranked in the 20% most employment deprived areas and 9 are ranked in the 10% most deprived. The deprived ward of Luton and Wayfield adjoins the Attwood family landholding. The proposed strategic level of housing in the corridor as part of a mixed scheme including infrastructure and open space will create investment that will benefit these communities in terms of;

- Jobs during the construction stage and also within the mix of uses proposed;
- Investment in modern infrastructure, education, health that can also be of benefit to the existing community;
- Open space recreational facilities, walks, cycle ways and better connectivity with the existing community;
- There will also be investment in improved bus accessibility;
- Affordable housing provision and opportunities for the new generation of the existing population to continue to live in their local community.

These benefits need to be considered in the weighting of options for the assessment of development spatial options by the Sustainability Appraisal as referenced later in these representations.

Health

3.7 The draft Medway Local Plan promotes active travel to combat obesity (30% of the Medway population is obese compared to 24% in England); promotes health to address smoking and diet indices in Medway that are recognised by the plan as the worst in the south east. The impact of lifestyle on mental and physical welfare is also recognised in the emerging plan. The potential for services and facilities to be reached on foot including green infrastructure and provision of trim trails also advantages the urban extension model over other spatial options compared with the slower emergence of a new community existing in isolation.

Vitality and Viability of Town Centres

3.8 The regeneration of the town centres is an objective of the local plan which recognises there has been underinvestment in the central areas and the retail/service offer. A well planned urban extension that is accessible to the town centres is more likely to support the wider plan objective as new householders are linked to the centre via rapid bus links and an improved network of cycleway and footway connections. In this way, the new community will be more reliant on town centre services and facilities promoting investment and an upward spiral of multipliers as the catchment increases and wider choice of retail providers can be attracted. This will not occur to the same level from the rural focus/new settlement option whose planning land use priorities will be upon promoting self-containment to make up for sustainability shortcomings.

Improved Access to Employment

3.9 The Attwood family landholding at 407ha is extensive and land use master planning proposals within the landholding (which are currently being refined) include the provision of a high-quality office/light industrial research and development business park set within landscaped grounds. Locationally, this business park would be sited in close proximity to a motorway junction (M2 J4) benefitting from wider accessibility, but would also be close to a significant existing workforce. The Sustainability Appraisal refers to the suburban scenario unfairly, negatively stating “employment land in suburban locations may not attract market investment and there is a risk that development would be dominated by residential uses.” These general assumptions of the SA ignore;

- The inclusion of employment land within the master planned proposals for this emerging urban extension;
- The proximity of the site to a motorway junction (J4 of the M2);
- The aspiration to create a quality landscaped business park which would generate local jobs for the catchment.

3.10 The Attwood family landholding includes provision for a quality business park which will help to address the high rates of out commuting of around 42% of total residents in employment (equating to 51,000 movements compared with 23,000 persons that travel in for work). The reduction in the net outflow of workers would;

- Reduce traffic movements and environmental impacts;
- Make the Council more competitive, attracting footloose investment from other district and boroughs etc.

3.11 Related economic drivers of the Medway economy include;

- Tourism and agriculture
- Town centre retail

3.12 Tourism in Medway is mainly related to the heritage of the town centre and the undeveloped landscapes to the north of the River Medway. Paragraph H19 of the Sustainability Scoping Report states that 'Medway's distinctive sense of place is closely linked to its landscape setting and the close proximity of a major urban area to undeveloped landscapes.'

3.13 The broad function of the Sustainability Appraisal is to garde development options according to their impacts the inclusion of Lodge Hill in each development scenario is **strongly objected to** for the reasons outlined below, as its inclusion **skews** the weighting unfairly within the assessment, in favour of the rural and new settlement options.

4 Comments on the Sustainability Appraisal March 2017

4.1 This part of the evidence base rightly functions to set the context and objectives as a baseline (Stage A) from which development and refinement of the spatial options and the assessment of their effects (Stage B) can be undertaken.

4.2 Notwithstanding the deliverability, viability and comprehensive masterplan land use advantages of phased provision that is unique to this strategic landholding within a land corridor that lies between the built-up areas of Hempstead and Lordswood, this landholding has other land use advantages compared with competing spatial options for growth.

4.3 Two land use option objectives that are focused on in the SA and derive from the NPPF are;

- "does it reduce the need to travel by car and improve accessibility to services";
- Will the social objective be achieved of creating a socially connected community that is strong and inclusive?

4.4 These objectives are purported to be a central component of the Sustainability Appraisal but this is not the case. For instance, the suburban layout Scenario 2 scores similarly to the "rural focus" option and this appears to be justified by the assertion that investment in public transport can resolve accessibility issues affecting the more isolated locations.

4.5 The Local Transport Plan of 2011 and the Sustainability Appraisal of 2017 acknowledge the low public transport usage by the resident population of Medway (which is less than 5% of trips) and has declined in recent years which does not reflect the regional trend. The potential for an urban extension growth corridor to increase the frequency of bus linkages and open up new routeways, will under this option, also benefit the existing catchment.

4.6 This benefit for the existing community was acknowledged at a recent appeal decision at Gibraltar Farm (APP Ref APP/A2280/W/16/3143600 for an area of 23.93 ha. which forms part of the corridor). The Secretary of State found that this site "was accessibly located (paragraph 22) and that this development of circa 450 dwellings would also benefit local residents in terms of play space and sustainable transport provision. These associated benefits would not occur for a more isolated growth option in the rural area.

4.7 One of the objectives of the Medway Local Transport Plan is a 'Fast-track style bus link' with park and ride and expansion of the cycle and footway links. These realistically are objectives that are best achieved by both the riverside regeneration option, which the Attwood family support (subject to certain caveats on capacity) and the suburban extension options.

4.8 Locating development where non-car modes of travel are not easily available is also important for affordable housing occupiers where car ownership is lower. The population of Medway is anticipated to increase from 276,000 to 330,000, a 20% increase. 50% of this increase is from persons of 65 years or older. Again, the propensity of this age bracket to use bus and non-car modes is increased, if spatially housing is located close to existing services and facilities, including medical hubs.

4.9 It is a national objective to manage transport modal shift toward more sustainable means of travel and improving accessibility to services and facilities for all. This does not appear to be currently reflected in the Sustainability Appraisal ranking of the options.

The NPPF is clear that the planning process "will actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable." This objective is reinforced at paragraph 34 of the NPPF which states".

"Plans and decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the issue of sustainable transport modes can be maximised."

4.10 The accessibility of the growth options to services and facilities is not weighted in the Sustainability Appraisal. This maybe because the Strategic Transport Assessment has not been prepared at this point in time. However, this must be factored in to the next stage of option selection if the plan is to pass the necessary tests of soundness. As well as the accessibility advantages, social, employment and environmental benefits must also be weighed against the other spatial options. This is not apparent in the SA draft at present and should be rectified when the transport input is available.

Inclusion of Lodge Hill

4.11 Lodge Hill is included in each of the 4 growth scenarios with a potential development of 3,000 dwellings. This is supported by the Sustainability Appraisal. As a methodology, this is 'unsound.' Whatever the Council's stance on Lodge Hill site it remains a new settlement option in an isolated and rural location that is subject to an SSSI designation.

4.12 It is a basic principle of national guidance that if significant harm can be avoided by locating development on alternative sites with less harmful impacts, these opportunities should be taken. If the Lodge Hill option is to be tested, it should be included as one of the Rural Fringe options only.

4.13 By including Lodge Hill as an option in each case, Medway Council is considered to be "fettering" the objective land use assessment of all sites and the integrity of the SA findings themselves. This methodology clarifies the Councils position, that the new settlement/rural settlement expansion options and issues with infrastructure, lack of social inclusion and need for public transport to compensate for a lack of accessibility, are comparable or better than the urban extension options. This stance in support of Lodge Hill which has been taken at Stage B of the Sustainability Appraisal, regarding the testing of options, unfairly skews the findings against the genuine urban extension spatial candidates. This is flagged up at this stage as it would be disingenuous to state that all options were scrutinised

equally when there is a clear 'planning mind-set' to support Lodge Hill which the SA has been clearly weighted to reinforce.

4.14 For instance Page 22 of the Sustainability Appraisal states "paragraph 4.27 supports Lodge Hill and concludes that the economic and social dimensions are positive and the environmental interests could be addressed through the mitigation and compensation strategy". Paragraph 4.27 states the "Council support for Lodge Hill as representing sustainable development." Whilst part of the overall quantum of housing is phased beyond the plan period with delivery anticipated by 2025, the Attwood family object to the commitment in the local plan to Lodge Hill, which should not be considered before urban extension options are fully explored. Otherwise this approach has to affect the objective judgements of the Sustainability Appraisal and cannot therefore be relied on to test options.

4.15 For instance, the Sustainability Appraisal at Page 19 states "Development in peripheral locations has the risk of increasing car based travel". Because of the desire of the Local Plan to support Lodge Hill whatever the mitigation proposed, the negative weighting to this risk which the SA will weigh up is likely to be minimal and on this basis, disadvantages the urban extension options at this option stage of the assessment.

4.16 The Sustainability Appraisal also references various reports including Kent and Medway "Unlocking the Potential …Going for Growth South East LEP" March 2014. This joint submission for funding by Kent and Medway references Lodge Hill as a clear commitment of the Council. This again suggest the spatial "mind-set" of the Council is not open at this point. Lodge Hill is referred to as "the largest residential development site in North Kent outside Ebbsfleet Valley and one of the "largest residential development sites in the South East LEP area and is **essential** to accommodating Medway's future growth".

4.17 Notwithstanding the Councils historic commitment to Lodge Hill, it is imperative this local plan process must consider spatial objections objectively and the true planning merits of opportunities for urban extensions weighted fairly in the consideration of options.

4.18 The need for housing, including affordable housing, in the district is recognised as are the benefits of providing it. The issue for the Plan is to set out policies to fully meet that need and consider whether Lodge Hill is a suitable place to provide it.

4.19 This issue has already been tested previously through the examination of the withdrawn core strategy. The inspector considered that the Core Strategy's proposals for Lodge Hill would have significant adverse impacts and would seriously undermine the Government's objectives set out in the Framework to halt the overall decline in biodiversity.

4.20 It was this conclusion of the inspector that resulted in the council eventually agreeing to withdraw the core strategy. Notwithstanding, in the light of that decision and the inspector's conclusions, the council subsequently resolved to grant planning permission for a mixed-use development at Lodge Hill including circa 5,000 dwellings.

4.21 Since specific policies in the Framework indicate development at Lodge Hill should be restricted (Sites of Special Scientific Interest/Birds and Habitats Directives; Framework paras 118-119) the "significantly and demonstrably" test in paragraph 14 of the Framework does not apply in any event. The core strategy examining inspector has already concluded that substantial harm to designated assets would arise from proposed development at Lodge Hill.

4.22 It is asserted in the draft plan, that the manner in which such harm can be mitigated is currently under investigation and will be presented to the Lodge Hill inquiry. This is not relevant because the council has not fully investigated what alternatives are available to

Lodge Hill and whether those alternatives will have less impact on biodiversity than what is being proposed at Lodge Hill and whether the presumption in favour of sustainable development applies to alternative sites, which is not the case at Lodge Hill (Framework paragraph 14).

4.23 Initially the council resisted the withdrawal of the core strategy which lead to an exchange of correspondence with the inspector. In a letter dated the 7th August 2013 the inspector, when considering the soundness of the core strategy, set out her concern with the sustainability appraisal and whether it met the requirements established in **Heard v Broadland District Council** i.e. that alternatives must be appraised as thoroughly as the preferred option. She also raised the implications of **Cogent Land LLP v Rochford District Council**, that an addendum report must be a genuine exercise rather than a mere justification for decisions that have already been taken.

4.24 It is quite clear that matters in respect of these issues currently remain as they were at the time the core strategy was withdrawn. It is self-evident from the SLA that many sites are available that are not subject to the constraints that pertain at Lodge Hill and it should be said, better located in relation to the urban area, so that they can be considered as planned urban extensions.

4.25 For the Secretary of State to make an informed decision on Lodge Hill, an objective Sustainability Appraisal will need to have been undertaken on alternatives and such evidence presented to the inquiry for examination. Such an exercise will need to objectively demonstrate that there are not enough alternative sites to Lodge Hill in Medway and that the only way to meet the overall housing requirement is to develop a site where the presumption in favour of development does not apply and where development in any event should be restricted, a conclusion already reached by an examining inspector. If and until this proves to be the case, the Plan must discount the 3,000 dwellings proposed to be included from the Lodge Hill site.

4.26 Attwood family note that the failure to properly assess alternatives will leave the council vulnerable to a High Court challenge to the adoption of the plan; another matter raised by the inspector in her letter of the 7th August 2013. The same will apply to any decision by

the Secretary of State to grant planning permission in the absence of a robust assessment of alternatives.

Green Infrastructure

4.27 The Sustainability Appraisal in its weighting methodology is felt to overstate the role of green infrastructure as comparable to a “magic solution” to mitigate impacts which reinforce certain assumptions about the rural options. For instance, at the Hoo Peninsula, Option 3 identifies up-to 6,500 dwellings at Hoo St.Werburgh and 2,500 additional houses at Hoo Peninsula and scores the impact comparatively neutrally as “green infrastructure could mitigate the impact”.

4.28 The masterplan will demonstrate how the provision of upto 4,500 dwellings in this land corridor can be achieved within a comprehensive landscaped framework. This is possible as the non developable area represents around 62% of the total landholding. This will serve to integrate the development in the landscape by;

- Linking the existing fragments of Ancient Woodland on either side of the land corridor to create a more cohesive green network;
- Improving the existing cycleway and footpath linkages with the existing community and responding to desire lines such as existing parks and schools and the Hempstead Shopping Centre for instance.
- To ensure the surface water drainage strategy is complimentary to the Green Infrastructure strategy for the site so that the green network is multifunctional.
- The Capstone Country Park can also be extended by the masterplan to create a landscaped area that will form a central island which will maintain a separation corridor of greater width at this point to other designated ALLI corridors;
- The creation of areas of open spaces and landscaped corridors as part of the Green Infrastructure network will enhance biodiversity and wildlife corridors and recreation can be better managed through the provision of trim trails etc enhancing this areas functional attractiveness and diverting recreational pressure away from the riverside SPA.
- The green network will also serve as a buffer from the AONB with an improved screen adjacent to the motorway which provides a strong delineating boundary feature at the southern boundary of the site.

- This landscaped framework will achieve a quality landscape led mixed use development

4.29 The Secretary of State in the recent decision at Gibraltar Farm when approving 450 dwellings on a site projecting across a significant part of the existing corridor concluded that the appeal submission would not lead to "coalescence between Lordswood and Hempstead or critical harm to the ALLI's function part of the corridor." The Inspector was also critical of the lack of reassessment of the ALLI designation boundaries ,since its origins which are suspected to date back to 1992 (para 189). Given the housing need it is also noteworthy that the appeal Inspector at paragraph 200 stated; "ALLI land will need to be developed unless new development is to be located where it would not be accessible in terms of proximity to existing development with its associated services and facilities."

Green Belt

4.30 It is also important to note that the suburban focus includes the only Green Belt option and it is important that the reporting of responses to this option are not distorted by the Green Belt feedback.

Duty to Cooperate

4.31 The comprehensive treatment of the corridor will involve cross boundary co-operation between Maidstone and Medway as the natural boundary of the southern extent of the development area is the motorway rather than the administrative boundary above it. The duty to cooperate is realistically possible because of the recent interim findings of the Examining Inspector to the Maidstone Local Plan (MLP) who has recommended that a review of the MLP is in place by April 2021.

4.32 The Attwood family has already engaged with Maidstone and Medway Council's on this matter.

5 Conclusions

5.1 The Attwood family support scenario 1 and the regeneration of the Riverside. This objective is consistent with national guidance. The role of this spatial option as a cornerstone of the plan must be considered alongside poor past rates of delivery. The draft Medway Local Plan Scenario 1 optimistically refers to possible increases in housing density but this option must be treated with caution for the following reasons;

- The necessary complicated land assembly, contamination costs, flood risk and environmental designations and overall viability issues that have historically affected delivery in the absence of public funding and even with the benefit of public funding

- As a riverside location, these areas are key pathways for green infrastructure, promoting walkways, footways and enhanced boat patronage as well as leisure, recreational employment and community uses which may reduce expectations of the housing yield;

- Infrastructure like schools and health provision which are land hungry will also need to be planned for and may erode the net developable area and density expectations;

- Finally, realistically to achieve viability most of the riverside sites will require high density development which is likely to result in high proportions of apartment accommodation. Other locations will need to provide the required choice of housing needed by Medway as a whole.

The inclusion of other spatial options to support realistic expectations of the housing capacity of the riverside redevelopment area is supported.

5.2 These representations support the key spatial guiding factors to be addressed as the plan progresses of;

a) Protection of the rural and coastal landscape to the north of the Medway for the sake of tourism, agricultural, landscape and its environment sensitivity;

b) Support for the regeneration of the riverside, subject to the riverside areas being assessed also as key pieces of green infrastructure alongside the river ,where a range of open space, leisure and education/community uses must be delivered (and mindful of the potential deliverability lag highlighted earlier in this statement).

5.3 For these reasons, the urban extension option is favoured and achieves best the requirement of Paragraph 151 of the NPPF namely "Local Plans must be prepared with the objective of contributing to the achievement of sustainable development."

5.4 The character of Medway mainly comprises an urban area and a rural area that is north of the River. The headland area contains extensive areas of estuarine landscapes which are heavily protected being designated as SPA's and SSSI's and SAC's. This rural character assists with tourism and contains land of higher agricultural land quality, as identified in the supporting report prepared by BTF Lister. The headland area is more sensitive in landscape terms and isolated and not as easily accessible to the Medway town centres. Housing development of a significant scale in this location would require supporting infrastructure and facilities to promote self-containment. A new community would also be less socially assimilated with the wider community compared with an urban extension and infrastructure improvements would not impact on the existing community. Finally, development on the headland would impact on the natural and farmed landscapes of Hoo, this wider landscape setting is important to Medway's sense of place.

5.5 For these reasons whilst the scale of development pressure is likely to require a range of development options, as part of the refinement and assessment of the options, it is asserted that given the fulfilment of a greater number of plan objectives, the urban extension model should be weighted in the SA ahead of the rural focus/new settlement options……. which may still be required after the urban extension site search has been exhausted.

5.6 The specific advantages of the Attwood family landholding which represents one of the largest undeveloped corridors directly adjacent to the urban area include;

- The whole of the corridor can be planned comprehensively and brought forward in a phased way over the lifetime of the plan.

- The site, being in single family ownership is free of land ownership and complicated multi owner agreements and because of its location close to existing services and infrastructure can address the chronic land supply position quicker than other alternatives.

- The site is more accessible to town centre services and facilities and public transport investment and improved connected via cycle ways and footway linkages will help to regenerate central areas and local communities (some of which are deprived such at Luton,)

- This option can create a more socially connected community.

- The creation of a truly mixed use development across the 407-hectare landholding will include business park provision close to the M2 motorway and the existing resident catchment helping to reduce out commuting and attract inward investment.

- Masterplan proposals which are being refined, will demonstrate that the existing green infrastructure can be linked to create a more coherent publically accessible recreational landscape and biodiversity resource that will maintain a separation function.

- One of the main planning objectives set out in the NPPF is to manage travel demand and the urban fringe expansion combined with the riverside regeneration achieves significant benefits compared with other options. The Strategic Transport Assessment when fed into the Sustainability Appraisal findings must recognise this current shortcoming if the options are to be fairly compared.

- There are no heritage, flood risk, agricultural land quality issues affecting the site (compared with higher grade land affecting other options) and the designated biodiversity interest is of a lower magnitude compared with the other options.

- This strategic land use option could deliver up-to 4,500 dwellings at a density of 40 dwellings per hectares.

5.7 In summary, Paragraph 10 of the NPPF states that “Plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas.”

5.8 The rigour of this assessment process cannot be reasonably claimed whilst the Sustainability Appraisal assessment weighting and each development scenario is so heavily weighted toward Lodge Hill. This unfairly disadvantages the urban extension options which have been historically subject to protection because of the fear of urban sprawl.

5.9 The NPPF requires that the Local Plan has a vision for the area and enhances and improves the places in which people live their lives. The urban extension option will likely attract more objections because of its proximity to a large residential catchment which will not be the same for more remote locations. Whilst the process of local plan preparation must be inclusive, spatial decisions must not be taken on the number of objections and should be based on sound land use reasoning and in line with paragraph 151 “prepared with the objective of contributing to the achievement of sustainable development.” It is concluded that the comprehensive master planned approach to the Darland and Hempstead Valley which largely is in the control of a single-family ownership best achieves this objective for the reasons outlined above.

DEVELOPMENT AROUND THE MEDWAY TOWNS

SIGNIFICANCE OF AGRICULTURAL LAND CLASSIFICATION

APRIL 2017

Contents

Appendices

1.0	**Instructions and Executive Summary**
1.1	The BTF Partnership is instructed to consider the implications of possible new development around the Medway Towns in the context of land quality as recorded on the Ministry of Agriculture Land Classification, also having regard to guidance in the National Planning Policy Framework on the use of Best and Most Versatile Land.
1.2	**Executive Summary** **The agricultural land classification notes that more than 90% of Kent's agricultural land is in the top three grades – Grades 1, 2 & 3. Kent has a far higher proportion of Grade 1 land than any other county in the south east region, and a higher proportion of Grade 2 land. The middle Grade 3 is subdivided into two, namely Grades 3a and 3b. It is estimated that approx. 70% of the Grade 3 classification in the area bounded by Walderslade, Darland and Hempstead is Grade 3b – below average quality for the south east region as a whole and probably some of the poorest land in the Medway/North Kent area. Government Policy seeks to protect Best and Most Versatile Land for future food production and urban expansion in the Walderslade/Darland/Hempstead area will not compromise that objective.**
2.0	**Alternative Development Proposals**
2.1	Medway Council is working on a new Local Plan to identify how future growth of the area might be achieved in terms of sustainability, more homes, jobs and services whilst providing protection and enhancement for environment and heritage.
2.2	In the Executive Summary of the Consultation document on the Medway Council Local Plan 2012 – 2035 it is recognised that there are constraints on the supply of greenfield land with much of the open countryside covered by environmental designations and Metropolitan Green Belt. The undesignated land is noted to be important for agriculture. It includes exceptionally high proportions of Best and Most Versatile land (BMV) by comparison with most other areas of the county.
2.3	The development options consultation document presents four alternative scenarios which are beyond the scope of this appraisal of agricultural land quality. The scenarios are:- 1. Maximising the potential of urban generation. 2. Suburban expansion 3. A rural focus 4. Urban regeneration and a rural town.
2.4 Appx 3	Commentary on the proposals recognises that much land on the Hoo Peninsular and bordering the urban areas of Strood and Rainham is of the highest grades of BMV land. This is stated in paragraph 3.12 of the Consultation Report and points out that Government Policy is for local planning authorities to take account of the economic and other benefits of BMV land. National Planning Policy does not preclude development on such areas of farmland, but directs that local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality (NPPF para 112).
2.5 Appx 1	Broadly speaking, the Consultation documents identify five areas for possible urban expansion. (indicative plans at Appendix 1)

	1. Hoo St Werburgh and Chattenden 2. Lower Twydall and Lower Rainham 3. Land to the east of Rainham and north of A2 4. Land to east of Rainham and south of A2 5. Land between Walderslade, Darland and Hempstead	
3.0	**Agricultural Land Classification**	
3.1	**Background**	
	3.1.1	The October 1988 commentary to the Agricultural Land Classification of England and Wales includes the following:-
	3.1.1.1	<u>*Introduction*</u> *The Agricultural Land Classification provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long- term limitations on agricultural use. The limitations can operate in one or more of four principal ways: they may affect the range of crops which can be grown, the level of yield, the consistency of yield and the cost of obtaining it. The classification system gives considerable weight to flexibility of cropping, whether actual or potential, but the ability of some land to produce consistently high yields of a somewhat narrower range of crops is also taken into account.*
	3.1.1.2	*The principal physical factors influencing agricultural production are climate, site and soil. These factors together with interactions between them form the basis for classifying land into one of five grades; Grade 1 land being of excellent quality and Grade 5 land of very poor quality. Grade 3, which constitutes about half of the agricultural land in England and Wales, is now divided into two subgrades designated 3a and 3b.*
	3.1.1.3	*The main climatic factors are temperature and rainfall although account is taken of exposure, aspect and frost risk. The site factors used in the classification system are gradient, microrelief and flood risk. Soil characteristics of particular importance are texture, structure, depth and stoniness. In some situations, chemical properties can also influence the long-term potential of land and are taken into account. These climatic, site and soil factors result in varying degrees of constraint on agricultural production. They can act either separately or in combination, the most important interactive limitations being soil wetness and droughtiness.*
	3.1.1.4	*The grade or subgrade of land is determined by the most limiting factor present. When classifying land the overall climate and site limitations should be considered first as these can have an overriding influence on the grade. Land is graded and mapped without regard to present field boundaries, except where they coincide with permanent physical features.*
3.2		The Medway Towns are bounded to the south west by the M2 Motorway and Channel Tunnel Rail Link. To the south east the M2 Motorway

		continues to provide a defined urban boundary and to the north of Rochester and Gillingham is the River Medway. The M2 is effectively the boundary of the Kent Downs AONB, which is designated on the south of the Motorway, away from the Medway Towns.
3.3	Appx 2	The urban boundary to the north west adjoins agricultural land classified as Grade 1 or Grade 2 with some Grade 3 land to the east of Wainscott. There is an extensive designated Site of Special Scientific Interest around Chattenden.
3.4	Appx 2	Hoo St Werburgh is virtually surrounded by Grade 1 agricultural land although there is Grade 3 land to north and south of the A228 to the west, but not abutting the village.
3.5	Appx 2	The environs of Lower Twydall and Lower Rainham are classified entirely Grade 1.
3.6	Appx 2	The land adjacent and to the east of Rainham on the north of the A2 is entirely Grade 1 apart from a small area of Grade 2 land to the north of Rainham Station.
3.7	Appx 2	The land adjacent and to the east of Rainham on the south side of the A2 is classified Grade 1 with some Grade 2 land to the west of Meresborough.
3.8	Appx 2	There is then a significant area of less productive land effectively bounded by Walderslade to the west, Darland to the north and Hempstead to the east. This is classified Grade 3, much of which is in the Grade 3b category, and is in "broad acres" production of oilseed rape, pulses and cereals.
3.9		**Land in Grades 1, 2 and 3a/3b categories are described as follows:-**
	3.9.1	*The ALC grades and subgrades are described below in terms of the types of limitation which can occur, typical cropping range and the expected level and consistency of yield. In practice, the grades are defined by reference to physical characteristics and the grading guidance and cut-offs for limitation factors enable land to be ranked in accordance with these general descriptions. The most productive and flexible land falls into Grades 1 and 2 and Subgrade 3a and collectively comprises about one-third of the agricultural land in England and Wales. About half the land is of moderate quality in Subgrade 3b or poor quality in Grade 4. Although less significant on a national scale such land can be locally valuable to agriculture and the rural economy where poorer farmland predominates* (not the case in the Medway area). *The remainder is very poor quality land in Grade 5, which mostly occurs in the uplands.*
	3.9.2	*Descriptions are also given of other land categories which may be used on ALC maps, such as "urban" or "woodland".*

	3.9.3.1	***Grade 1 - excellent quality agricultural land*** *Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown and commonly includes top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality.*
	3.9.3.2	***Grade 2 - very good quality agricultural land*** *Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than Grade 1.*
	3.9.3.3	***Grade 3 - good to moderate quality agricultural land*** *Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in Grades 1 and 2.*
	3.9.3.4	***Subgrade 3a - good quality agricultural land*** *Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.*
	3.9.3.5	***Subgrade 3b - moderate quality agricultural land*** *Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.*
4.0	**National Planning Policy Framework**	
4.1	Appx 4	Natural England's Technical Information Note TIN049 entitled Agricultural Land Classification; protecting the Best and Most Versatile agricultural land summarises how this important natural resource should be protected from inappropriate development.
	4.1.1 Appx 3	Government Policy for England is set out in the National Planning Policy Framework (NPPF) at paragraph 112. Planning Authorities should take into account the economic and other benefits of the Best and Most Versatile agricultural land and where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality.

	4.1.2 Appx 4	The TIN explains the Agricultural Land Classification system and refers to the Town & Country Planning (Development Management Procedure) (England) Order 2010 (as amended) which refers to BMV Policy in requiring statutory consultations with Natural England. These consultations are for non-agricultural development proposals that are not consistent with an Adopted Local Plan and involve the loss of 20 hectares or more of BMV.
4.2	**The Medway Area**	
	4.2.1	I have made an approximate assessment of the percentages of land in each MAFF Land Classification Grade within the Medway District and this is shown in the table below against percentages shown in the October 1981 MAFF Land Classification notes for the different grades in England and Wales, as against Kent and East Sussex as a sub region. It will be noted that the Medway Area has significantly more Grades 1 and 2 land than the overall percentages encountered nationally or in Kent and East Sussex generally. **Agricultural Land Classification – Distribution of Grades**

Grade	England & Wales	Kent & East Sussex	Medway Area
1	2.8%	8.6%	39.0%
2	14.6%	18.5%	7.0%
3	48.9%	58.1%	24.0%
4	19.7%	14.1%	29.0%
5	14.0%	0.7%	1.0%

	4.2.2	It will be seen from the above table that 46% of agricultural land in the Medway area is in Grades 1 and 2 with 24% in Grade 3 excluding any split as between Grades 3a and 3b. That overall split cannot be ascertained without detailed survey work beyond the scope of this report, but it is reasonable to estimate that some 60% of Medway's agricultural land is BMV. It is worth noting that the 29% of land classified Grade 4 is mainly contained within the Thames & Medway Coastal Marshes which are of exceptional biodiversity importance, and unsuitable for development.
	4.2.3	The agriculture of the Medway area has always been of regional importance. Favourable soil types and proximity to London and transport communications has always supported a thriving horticultural sector with top and soft fruit, vegetables and salads grown widely throughout the district. These enterprises will generally only be found on Grade 1 and Grade 2 land, and those businesses engaged in intensive production are significant drivers in the local rural economy.
	4.2.4	The only area identified for possible urban expansion, and which would not see the loss of large tracts of BMV land is the Grade 3 area between Walderslade, Darland and Hempstead.

5.0	**Suitability of Key Locations for Agriculture**	
5.1	Hoo St Werburgh and Chattenden The majority of the open agricultural land surrounding the existing built development at Hoo St Werburgh is classified Grade 1 and has seen a wide range of intensive horticultural cropping over the years, for which it is well suited. With the free movement of fruit, vegetable and salad crops within the EU, intensive cropping has tended to become more rotational than annual, because of competition within the EU. With the advent of Brexit the UK may seek to rely more on home production which will intensify the essential importance of BMV land. The arable land to north west and south east of the A228 between Hoo St Werburgh and Chattenden is Grade 3. The land is open and relatively level in relief and whilst no detailed investigation has been carried out, it is likely to fall within the Subgrade 3a, indicating BMV characteristics.	
5.2	Lower Twydall and Lower Rainham Similar comments apply in relation to the long-term importance of BMV land. In this area, the predominant horticultural use is in top fruit production (apples and pears) for which the high quality soils between the Medway towns and Faversham are nationally renowned as the North Kent Fruit Belt. Land in this locality is entirely BMV and should be protected for agriculture.	
5.3	Land to the east of Rainham and north of A2 Comments as 5.2 above. These predominantly Grade 1 soils should not be considered for development on any scale.	
5.4	Land to east of Rainham and south of A2 Comments as 5.2 above. Mainly Grade 1 soils, typical of the North Kent Fruit Belt, and should always be available to agriculture and horticulture.	
5.5	**Land between Walderslade, Darland and Hempstead**	
	5.5.1	Soils in this locality are Grade 3 and, as already indicated, devoted to broad acres arable farming in the production of cereals, oilseed rape and pulses. As explained in Section 3.9 above, the Grade 3 classification is split between Subgrade 3a (Section 3.9.3.4) and Subgrade 3b (3.9.3.5).
	5.5.2 Appx 5	A report on soil quality was carried out by the noted soil consultant, Alan Furneaux in October 2000 (Appx 5). This was commissioned to ascertain the agricultural land classification of some 160ha/400ac north of the M2 Motorway between Walderslade and Hempstead. The soil survey noted the differentiation between Grade 3a and Grade 3b soils and the Grade 3b soils were found to cover approx. 70% of the area surveyed. These proportions are likely to be found throughout the area of Grade 3 land classification between Walderslade, Darland and Hempstead and this is clearly the only locality in the Medway area where the impact of development on BMV land can be minimised.

6.0	Conclusions
6.1	It is clear from the above that, apart from the adverse implications of development on land designated as SSSI at Chattenden, there are potentially significant losses of Grade 1 or Grade 2 land if there is significant development expansion in the vicinity of Hoo St Werburgh, Lower Twydall/Lower Rainham, and to the east of Rainham either north or south of the A2.
6.2	Natural England is consulted by planning authorities on the preparation of all development plans as part of its remit for the natural environment. For planning applications, specific consultations with Natural England are required under the Development Management Procedure Order in relation to Best and Most Versatile agricultural land wherever a loss of 20 hectares or more of BMV land is proposed.
6.3	At para 112 of the NPPF, local planning authorities are required to take into account the economic and other benefits of the Best and Most Versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Approx. 70% of the agricultural land in the Walderslade/Darland/Hempstead, to the north of the M2 Motorway area is Grade 3b, i.e. of poorer quality than the BMV guideline.
6.4	Loss of BMV land is kept to a minimum if development is planned within the area bounded by Walderslade/Darland/Hempstead.

Ref: MWSB/R0148.14
Date: 4 April 2017

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APPENDIX 1

INDICATIVE MASTERPLANS

MAKE YOUR VOICE HEARD

Medway Council Local Plan 2012-2035

Executive summary

January 2017

www.medway.gov.uk/futuremedway

Medway Council
Serving You

Introduction

Medway Council is preparing a new Local Plan to provide direction on the future growth of the area. The aim of the Local Plan is to ensure Medway grows sustainably, to provide land for the homes, jobs and services that people need, whilst protecting and enhancing the area's environment and heritage. The Local Plan covers the period up to 2035. Once adopted it will replace the 'saved' policies in the 2003 Medway Local Plan and the Kent Waste and Minerals Local Plans.

The timetable for preparing the Local Plan is set out in the Local Development Scheme 2016. The council aims to submit a draft Local Plan for independent examination in Spring 2018, for adoption (subject to the examination's outcome) in 2019.

The council consulted on 'Issues and Options' in 2016. The Development Options consultation document responds to the information gathered then, including over 200 written responses from a wide range of residents, statutory organisations, businesses, interest and community groups, landowners and developers.

The decision on which locations are most suitable for development is critical for the Local Plan. This stage of the plan making process must consider options for how development could be allocated across Medway.

You can help shape the future of Medway and be involved with the Local Plan

The council welcomes comments on the draft vision and strategic objectives, the development options and the policy approaches. These consultation responses will be taken into account in the next stages of preparation of the Local Plan 2035.

The consultation will run from **Monday, 16 January until 5pm on Monday, 6 March 2017.** All comments must be submitted by this time in order to be considered. More information about consultation events and exhibitions will be available on the Council's website at www.medway.gov.uk/futuremedway

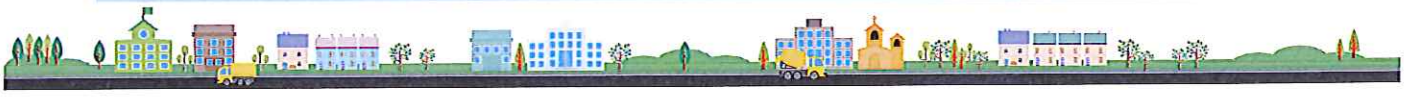
You can submit comments by email: **futuremedway@medway.gov.uk**

Alternatively you can write to us at:

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

Copies of the consultation document are available to view at public libraries across Medway, at the reception desk of the council offices at Gun Wharf, during opening hours, and online at: www.medway.gov.uk/futuremedway

This information can be made available in other formats by telephoning 01634 333 333
For this information in a different language telephone 01634 335 577



Medway Local Plan 2035 – vision and strategic objectives

Context

Medway is one of the largest urban areas in the south east, similar in size to cities like Brighton & Hove and Plymouth. The population of 276,492 (in 2015) has a slightly younger age profile than Kent and England averages, and an increasing number of people over 65 years. The population is expected to reach 330,220 in 2035. Much of this growth is from natural change i.e. births outnumbering deaths.

Medway benefits from a stunning landscape setting, including significant areas that are internationally important for wildlife. It has rich heritage, high speed train links, universities, a strategic location in the Thames Gateway and a diverse selection of services and businesses.

However, it also has a weaker economy and lower skills levels than competing areas, and marked inequalities in health. It does not enjoy the recognition, or the range of services and facilities, that might be expected for a city of this size. This is particularly apparent when considering the retail and leisure offer of Chatham town centre.

The scale of growth Medway is experiencing is challenging. The established regeneration programme has brought benefits such as the universities at Medway and infrastructure investments. However, there is concern amongst local people that further growth will result in negative impacts, such as longer waits for health services, competition for school places, loss of green spaces and increasing delays in moving around Medway.

The Local Plan seeks to manage growth to achieve a more successful, attractive Medway with healthier communities that share in the benefits of development. Growth does not mean losing the character of the area. The natural and built environment defines Medway, and will be at the core of the Local Plan. The development strategy must show how we can provide land for housing, jobs, infrastructure and services, whilst protecting important environmental and heritage assets.

Strategic Issues

A successful plan for Medway's future must include consideration of cross-boundary issues. Medway is part of the Thames Gateway regeneration programme, there are commuting links to surrounding areas, including London, and although two-thirds of house moves in Medway come from existing residents there are also moves into and out of the area. Bluewater has a major impact on retail patterns in Medway and surrounding areas, and Medway is of regional and national importance in the import of aggregates and the energy industry.

The natural environment of Medway is also linked with surrounding areas. For example, the internationally important wetlands of the north Kent coast and the Kent Downs AONB both cross borough boundaries.

The council has a duty to cooperate with other Local Planning Authorities, county councils and prescribed bodies when producing the Local Plan. Further details on the range of strategic matters that we must consider are set out in a Duty to Cooperate Scoping Report available on the council's website. The Duty will be met through a range of existing partnerships with relevant bodies as well as through events and work undertaken specifically to support the production of the Local Plan 2035.

Vision and Strategic Objectives

The Local Plan 2035 is an opportunity to establish a positive strategy to guide Medway's development over the next 18 years. The Development Options consultation document sets out a vision of how we could make the most of this opportunity. In summary:

> *By 2035 Medway will be a leading waterfront University city of 330,200 people, noted for its revitalised urban centres, its stunning natural and historic assets and countryside.*

Regeneration is at the core of the council's growth plans and the vision. Investment in high quality development along the waterfront and in town centres will bring homes, jobs, services and new links for all of Medway's communities. The regeneration of Chatham is central to the success of this approach. In line with wider retail trends, it should evolve to broaden its offer, particularly in the leisure, culture and community sectors, and become a focus for community life.

Development and growth at each of the five distinct towns and their wider neighbourhoods will respond to their specific characteristics and requirements. The Local Plan will seek to direct growth to the most sustainable locations, where there is potential to expand, to secure investment in infrastructure and services, and to respect the character of the environment. It is likely that most areas of the borough will experience some degree of change and growth. The challenge is to ensure this strengthens the area.

Development and regeneration to help establish Medway as an attractive city and counteract the unfair negative perceptions of the area can also help to boost the economy by making it more attractive to businesses.

The natural and historic environment, including the river and estuary, will continue to be central to the vision for Medway's future. The urban areas should benefit from functional and attractive links to the countryside and open spaces. A riverside path would be a draw for residents and visitors alike, linking regeneration to the wider area, providing a focus for public, community and cultural activities, and supporting healthier lifestyles.

In order to deliver the vision there are a series of strategic objectives, based around four key themes:

- A place that works well
- A riverside city connected to its natural surroundings
- Medway recognised for its quality of life
- Ambitious in attracting investment and successful in place-making

Options for delivering sustainable development

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:

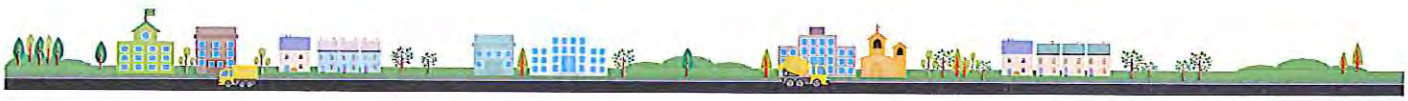
- 29,463 homes
- 49,943m² of B1 office space, 155,748m² of B2 industrial land, and 164,263m² of B8 warehousing land
- 34,900m² of comparison retail space and 10,500m² of convenience (groceries etc.) retail space up to 2031

The starting point for the development strategy in the Medway Local Plan is making the most effective use of land to deliver the strategic objectives for Medway's growth. The residential pipeline of sites and regeneration programme is a key strand of this, but there is limited capacity to realise additional development from these areas without taking a more radical approach. It is unlikely that the full range of development needs could be met solely in these areas or on brownfield land.

However, there are significant constraints on much of the potential supply of greenfield land. Developing on urban parks and open spaces would damage the quality of life in urban areas. A large proportion of the open countryside is covered by environmental designations, for ecology reasons on the Hoo Peninsula, but also including the Kent Downs Area of Outstanding Natural Beauty (AONB) and the Metropolitan Green Belt to the west of Strood and in the Medway Valley. Many areas of undesignated land are an important resource for agriculture including large areas of the highest grades of best and most versatile land.

Given the scale of growth projected, the council also has to look carefully at the form of development, and whether larger planned settlements may be a more suitable method of ensuring all the needs of Medway's present and future communities are met than a strategy of incremental growth at the edges of villages and towns.

The Development Options consultation document presents four alternative scenarios for potential development strategies. The regeneration programme remains a central plank of all four scenarios. The scenarios are summarised on the following pages.



Scenario 1: Maximising the potential of urban regeneration

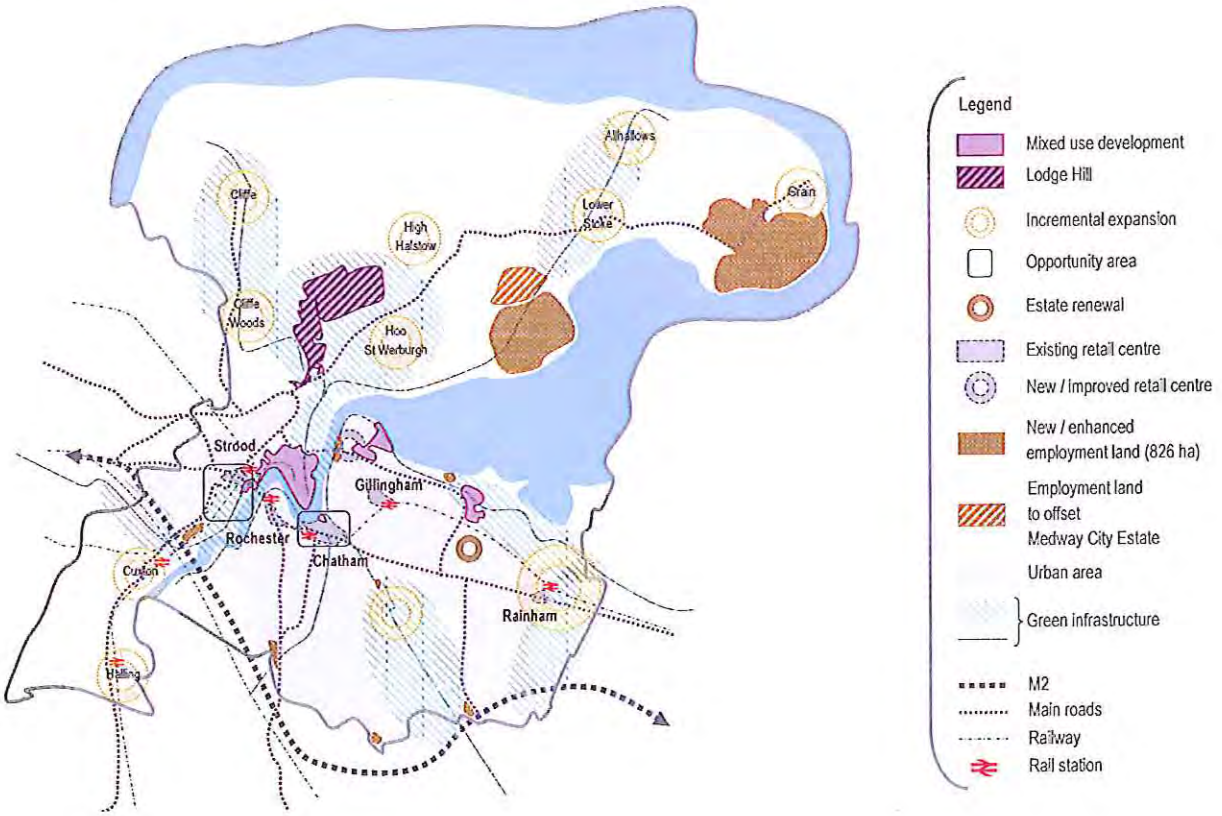
This option would continue regeneration of waterfront sites but would also bring in new areas and a major transformation in the approach to the urban centre. It includes building at higher densities, bringing mixed development into retail and employment areas and extending regeneration into more peripheral areas, especially where opportunities exist in Chatham and Strood. It would make more intensive use of land, with retail hubs concentrated in town centres surrounded by housing, mainly in the form of apartments, and a wider range of jobs.

This form of development would define a new character for the town centres and an increase in housing in these areas would boost the catchment for services and facilities to help address the challenges of competition from other areas and online shopping.

In this scenario, regeneration would extend beyond the edge of Gillingham to include a modern football stadium and mixed development at Mill Hill. Consideration is also given to redevelopment of Medway City Estate and Chatham Docks to create new urban quarters, with a modern employment park around Kingsnorth to provide land for relocated businesses.

As housing in apartments in high density areas would not meet the needs of all sectors of the population, there would still need to be consideration of suburban and rural areas for development to achieve a balanced and sustainable strategy.

Risks associated with this scenario include the ability to deliver within the plan period, potential loss of employment supply, how to secure infrastructure and growth, viability issues, impact on heritage assets around the river and town centres, and difficulties in providing the full range of housing required.

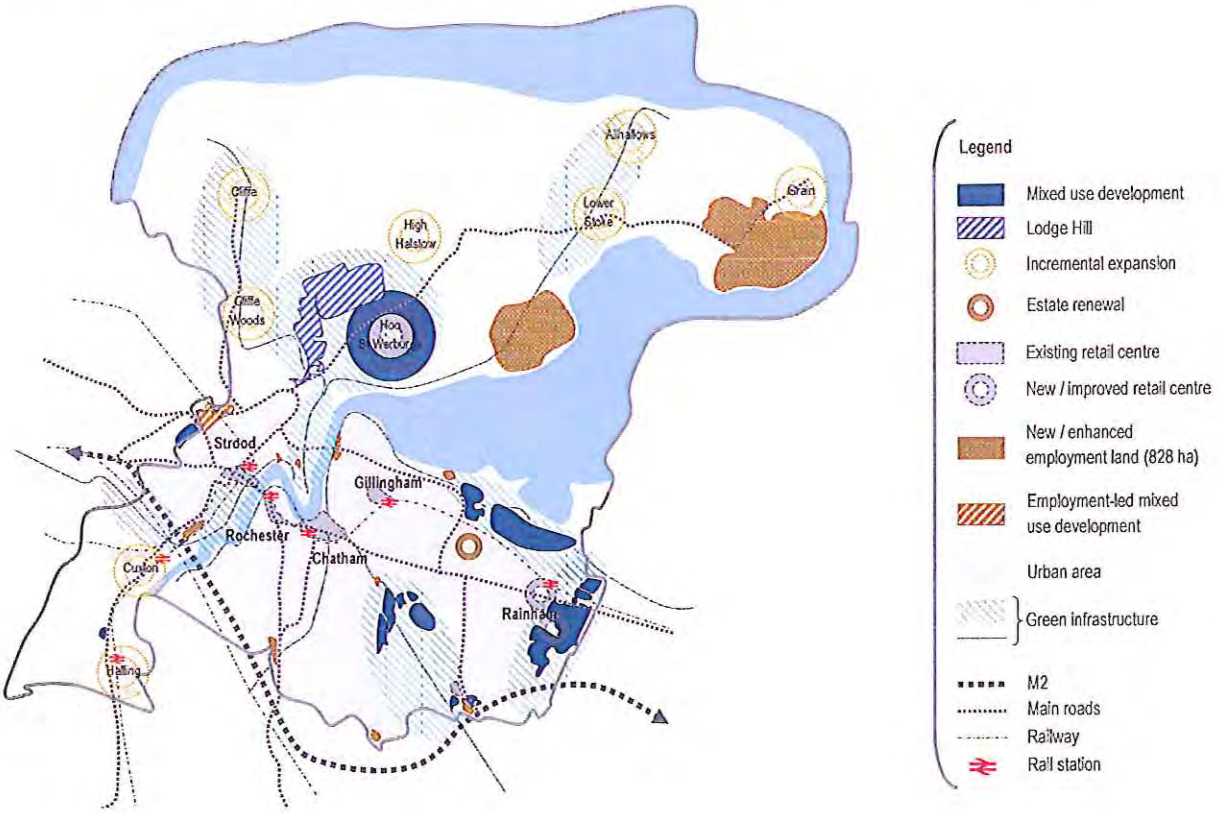


Scenario 2: Suburban expansion

Many sites bordering the urban area and villages have been identified as potentially available for development. Some are subject to environmental constraints and others lack infrastructure and access to services. However, planned growth at a suitably large scale could deliver mixed used development to support housing with new services, shops, infrastructure and jobs, and could incorporate green spaces and linkages to ensure high quality new suburban neighbourhoods that promote healthy lifestyles and offer real alternatives to car-based travel.

In this scenario, consideration would be given to the development of sustainable urban extensions around Rainham, Capstone and Strood, complementing the urban regeneration programme. These areas are already attractive to residents and being predominantly greenfield may be quicker to develop. However, capacity in these areas is limited by the borough boundaries and important landscape features, and some development around villages on the Hoo Peninsula would also be required, including incremental growth in a number of villages and significant mixed-use expansion around Hoo St Werburgh. Release of Green Belt land to the west of Strood is also included, to consider whether such a significant policy change may be necessary or justified.

Stress on the highway network at a number of key junctions and routes have been highlighted by initial assessments and would have to be addressed to accommodate growth in these areas. If resolving this requires major new transport schemes that cannot be supported on environmental or viability grounds, it would undermine the deliverability of this scenario. Potential cross-boundary effects would also need to be considered through discussions with adjacent authorities.



Scenario 3: A rural focus

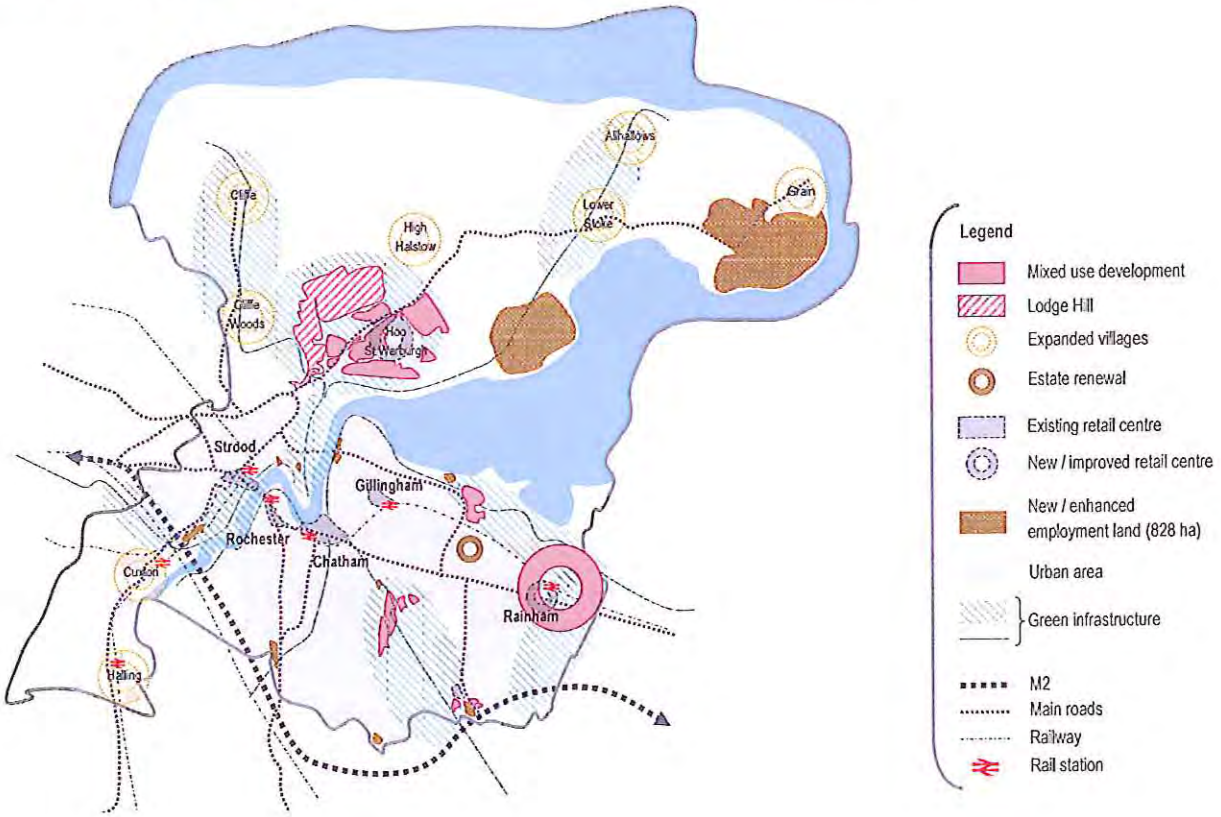
This scenario considers the potential of Hoo St Werburgh as a focus for growth, expanding the existing large village into a small rural town. This would include developments around neighbouring areas such as Chattenden, Deangate and Lodge Hill, and the provision of services and infrastructure to support the expanded town and its rural surrounds. Other villages with the facilities to support an increased population would also be expanded.

There would still need to be some development in suburban areas under this scenario, to support the delivery of a range of housing types.

Development of this scale in the rural area would inevitably change the character of Hoo and have an impact on the environment and countryside character bordering the villages. Care would be needed to ensure development is planned in a way to respect key landscape features, respect and enhance the rural setting, and retain separation between urban and rural Medway. Provision of improved green infrastructure links for people and wildlife would be critical.

The council supports the development of Lodge Hill as a planned new settlement, but the planning status of the land is uncertain, dependant on the outcome of a Public Inquiry scheduled for Spring 2018. For the purposes of preparing the new Local Plan, the council is considering Lodge Hill as an option to help meet development needs for the second half of the plan period. This scenario takes it into account in coordination with a wider development around Hoo St Werburgh.

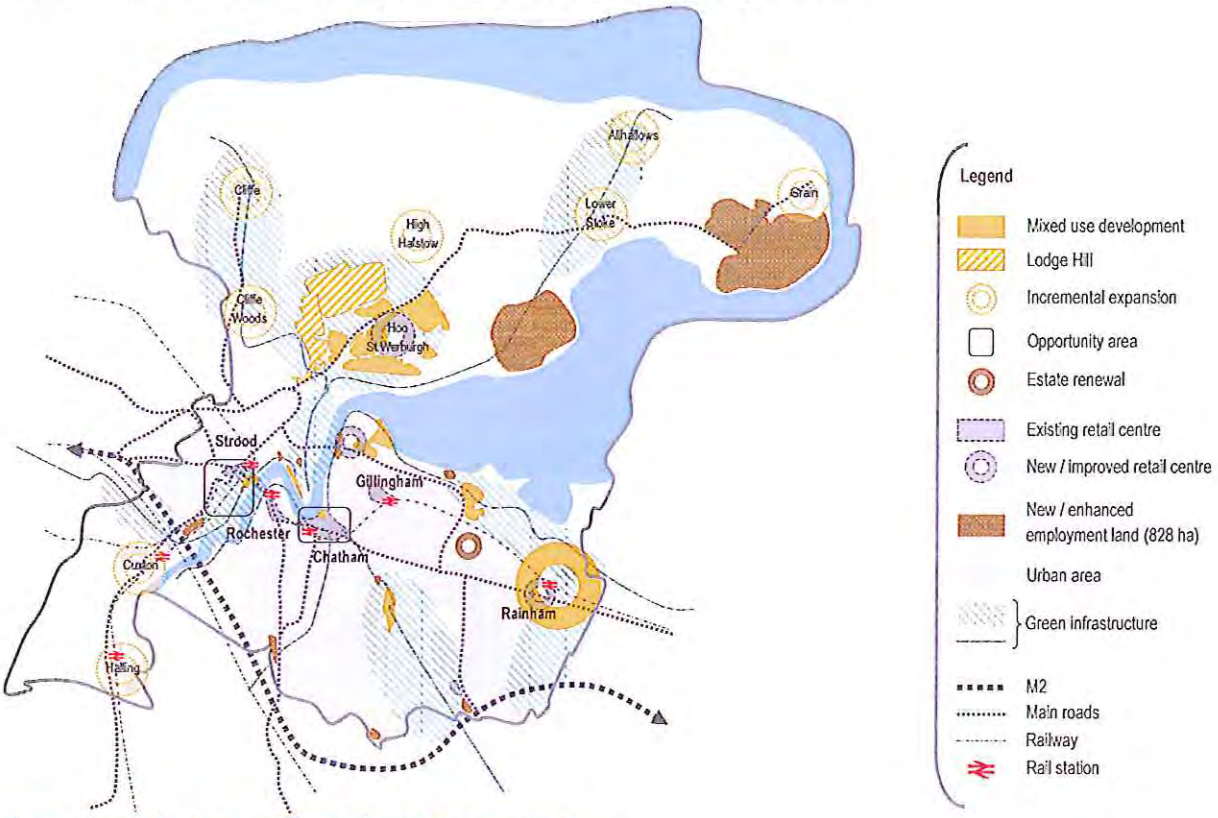
A further key challenge for development under this scenario is the capacity of the local transport network to support increased development. Four Elms Roundabout has been identified as a congestion hotspot and work is progressing to increase capacity in this area, but it is likely a significant increase in planned growth would require further investment. The availability of alternatives to car-based travel for rural residents also needs consideration.



Scenario 4: Urban regeneration and a rural town

This combines elements of the three development scenarios set out above, including some higher density development around the waterfront and town centres and seeking opportunities to consolidate development sites in the urban areas. However limited land is identified for comprehensive redevelopment at Medway City Estate and Chatham Docks, due to their complexity.

Suburban expansion would be supported to deliver sustainable and healthy urban extensions, but restricted in scale to mitigate the potential for urban sprawl and unsustainable travel patterns. Some aspects of the rural focus scenario would be supported, for their potential to enhance the provision of services and jobs on the Hoo Peninsula, and strengthen the role of Hoo St Werburgh, but not at the scale envisaged by scenario 3.



Approach to policy development

The Development Options consultation document sets out the council's proposed approach to policy development in the following areas:

- Housing (including provision for affordable housing; gypsy and traveller accommodation; and specialist accommodation such as HMOs, mobile homes and houseboats, and student accommodation)
- Employment (including employment land needs, rural economy and tourism
- Retail and town centres
- Natural environment and Green Belt (including landscape, ecology, green infrastructure, flood risk and air quality)
- Built environment
- Health and communities
- Infrastructure (including implementation and delivery)
- Sustainable transport
- Minerals, waste and energy

These approaches will be developed into policies, which will be used to assess planning applications once the new Local Plan is adopted.

The starting point is that Medway will seek to meet its identified needs for growth and development, as required by government policy. The policy approach sets out how it is envisaged this can be achieved in a sustainable way while protecting the area's communities and other important characteristics. In some cases, the evidence base to support policy production is still ongoing, and the document sets out where additional information is required to inform future policy direction.

Draft policies including detailed wording will be set out at the next stage of the plan making process, when a draft local plan is produced. The council welcomes comments on the proposed direction of the policies to inform the draft plan.

Scenario 1 Maximising the potential of urban regeneration

This approach seeks to achieve the greatest potential from brownfield sites to deliver the development needed in Medway over the plan period. As many of these sites already form the core of Medway's regeneration plans, a more radical approach would be required to deliver substantial increases in development. Consideration is therefore given to building at higher densities in sites that do not yet have approved schemes, and bringing forward new areas for development. These include the redevelopment of employment sites at Medway City Estate and Chatham Docks for mixed use schemes, opportunities for land assembly in central areas that could support new development, and renewal of residential estates to deliver modern quality housing at higher densities. The regeneration area could extend to a new site at Mill Hill for a modern stadium for Gillingham Football Club, with supporting residential, leisure and retail services. This approach would increase investment in Medway, revitalising the central area, boosting the vitality of the town centres, and providing new employment sites in both central areas, and purpose designed provision through an extension at Kingsnorth on the Hoo Peninsula.

It is recognised that there are challenges associated with the delivery of large scale regeneration schemes, including land assembly, site preparation works and costs, managing the impact on transport networks and the provision of infrastructure and services. To provide for the mix and range of development needed by Medway's communities, it is considered that a proportion of development would also be delivered in suburban and rural areas to complement the urban regeneration offer.

All development would be supported by investment in transport and new community facilities, including new/extended secondary and primary schools, health and community centres and parks.

Redevelopment of Medway City Estate and Chatham Docks could provide:

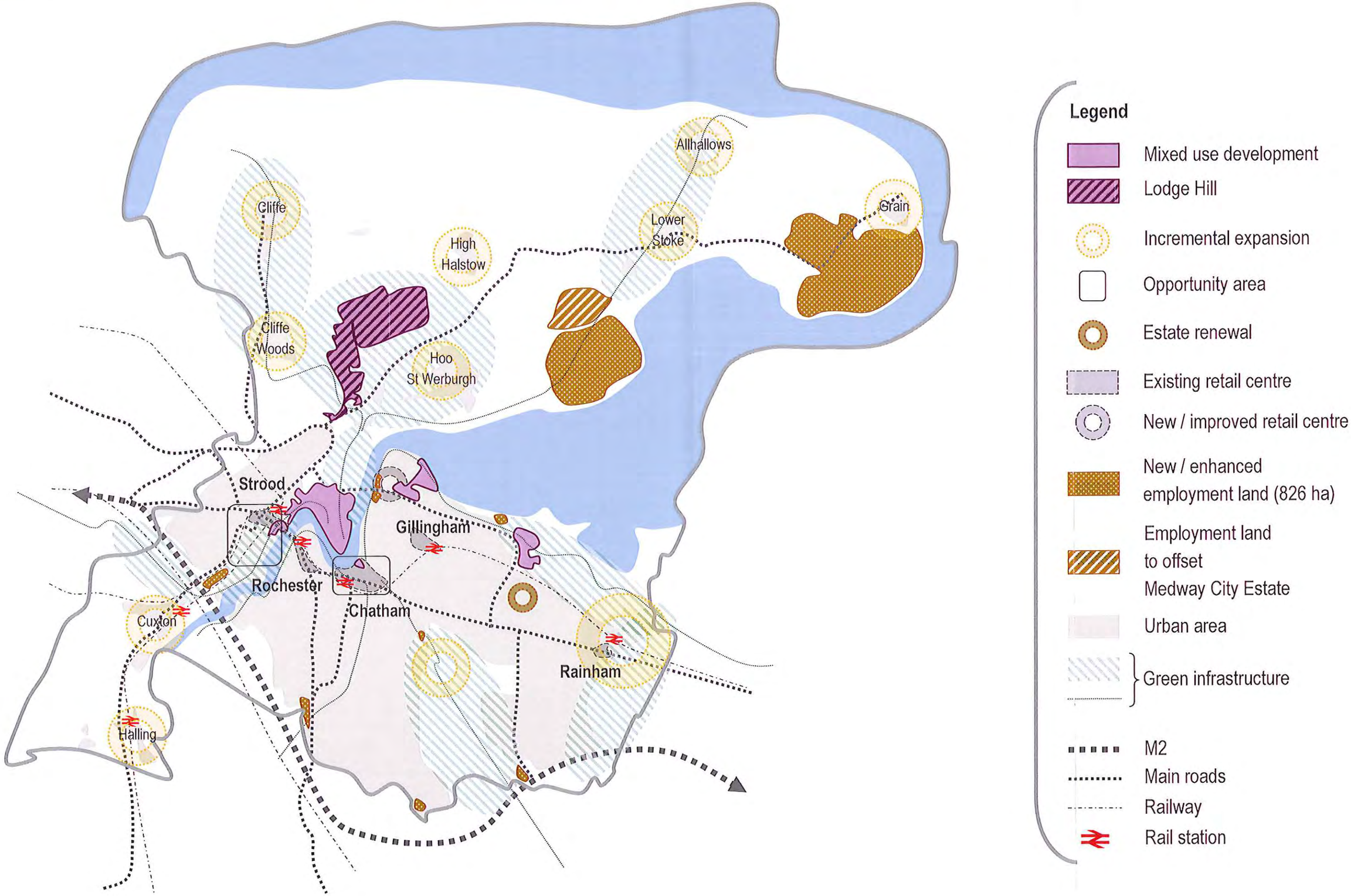
- Up to 5000 homes
- Employment land integrated into mixed use schemes, and provision of new business park at Kingsnorth to attract inward investment and make provision for relocating firms
- Transport investments, including a new link across the river to the Frindsbury peninsula
- Retail and leisure facilities
- increasing access to the waterfront

Extended regeneration in urban areas could deliver:

- Development at higher density in central and waterfront sites in Chatham and Strood, land assembly to achieve further development land in centres, mixed use scheme at Mill Hill, and estate renewal providing:
    - 5,500 homes, supported by investment in transport and community services.
    - Employment and retail land

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.

Appendix 1B – Maximising the potential of urban regeneration



Scenario 2 Suburban expansion

This scenario retains a core component of urban regeneration as part of a balanced development strategy. This approach considers the potential of the suburban areas to meet the shortfall between development needs and the identified pipeline of sites. It responds to the availability of land being promoted in these locations.

Consideration is given to the potential of sustainable urban extensions around Rainham, Capstone and Strood to complement the urban regeneration taking place in central Medway. These would be planned to coordinate the growth of housing with transport improvements, services and infrastructure, jobs and shops.

Care is required to achieve quality development at a scale that could be supported by infrastructure upgrades and the local environment, and does not create an unacceptable negative impact on existing communities, or promote unsustainable travel patterns and detract investment from regeneration areas.

A significant issue in this option is the consideration of the review of the Green Belt boundary to bring forward development land. The consultation and ongoing preparation work on the Local Plan will determine if there is a need to release land in the Green Belt, or if provision for development needs can be met in other areas.

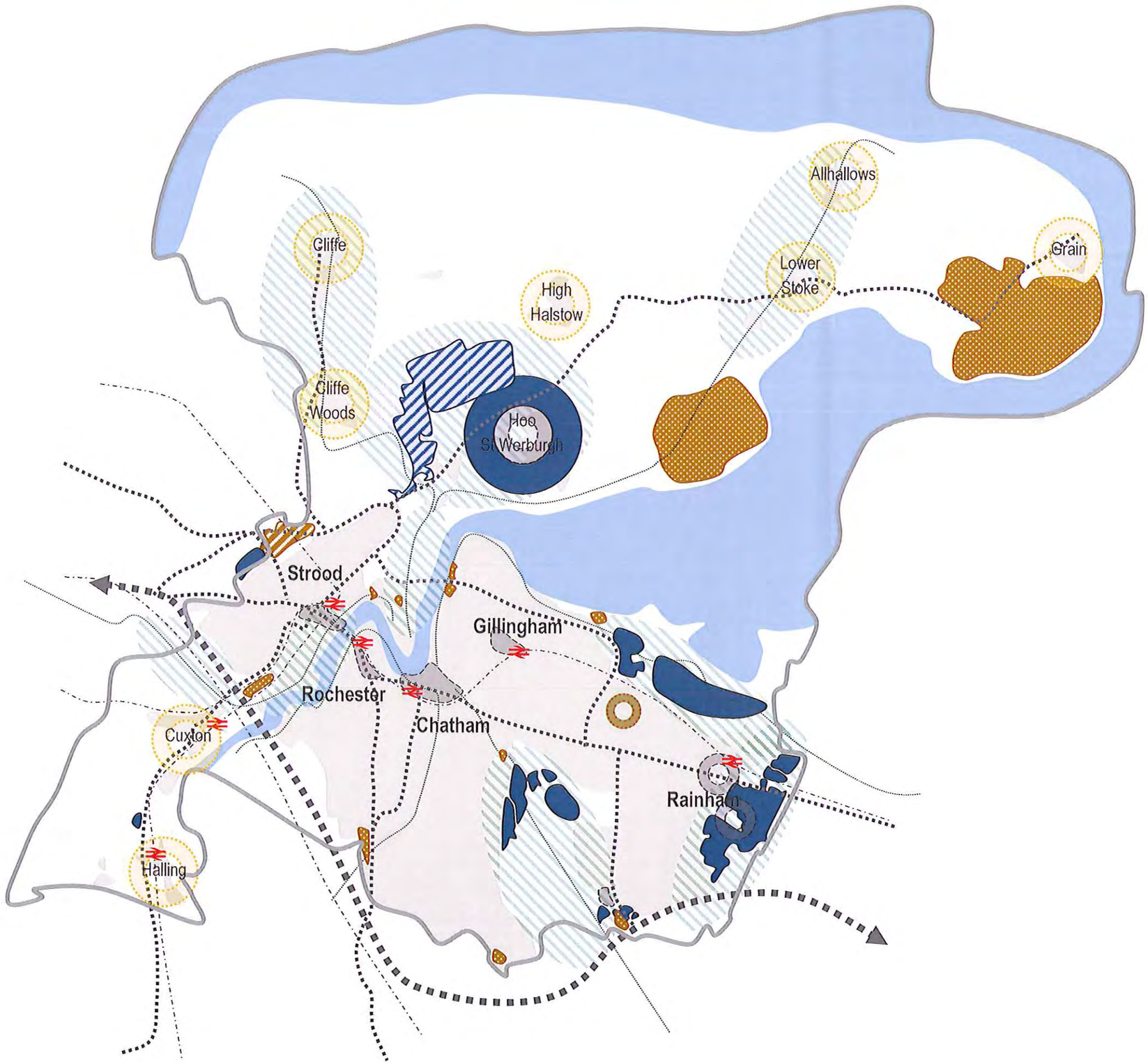
Suburban development around Rainham, Capstone and Strood could deliver:

- 10,700 homes
- Community facilities, including new/extended secondary and primary schools, health care and community centres
- Employment and retail land integrated into new developments, as well as investments in Rainham town centre and peripheral sites near Strood and Hempstead that would provide accessible employment sites.
- Enhanced green infrastructure providing quality development and links to existing neighbourhoods

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. Development in the rural areas could include:

- Development of up to 3000 homes at Lodge Hill, with supporting services, infrastructure, jobs, shops and open spaces
- Expansion of Hoo St Werburgh, to deliver 2000 homes, with supporting services, including schools, health and community centres, retail and employment land.
- Smaller scale growth of villages to deliver 900 homes, with investments in transport, services and open spaces.

Appendix 1C – Suburban expansion



Legend

- Mixed use development
- Lodge Hill
- Incremental expansion
- Estate renewal
- Existing retail centre
- New / improved retail centre
- New / enhanced employment land (828 ha)
- Employment-led mixed use development
- Urban area
- Green infrastructure
- M2
- Main roads
- Railway
- Rail station

Scenario 3 A rural focus

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.

A key component is the possible expansion of Hoo St Werburgh into a small rural town, supporting a range of enhanced services, including schools and health care, jobs and parks. This small town could serve the wider peninsula. Consideration is given to further growth of villages on the Hoo Peninsula with a range of services and facilities that could support an increased population.

It is recognised that the scale of growth considered in this scenario would require significant investment in infrastructure, critically transport, together with wider social and environmental services.

This approach could deliver a rural town based around Hoo St Werbugh, including:

- 6500 homes
- Investment in transport
- A new retail centre and employment land
- A secondary school and 5 primary schools
- Community facilities, including a Healthy Living Centre, library and community centre
- Open space including play areas and local amenity greenspaces, and two country parks around the Saxon Shore Way and Deangate

Further development on the Hoo Peninsula could deliver:

- Lodge Hill – up to 3000 homes, schools, community facilities, including health, library and community centre provision, employment space, retail centre and leisure and open space, play areas and country park.
- Expanded villages – Cliffe, Cliffe Woods, High Halstow, Lower Stoke, Allhallows, Grain – 2600 homes, primary schools, parks, health and community facilities

Suburban and wider rural development could also provide for a choice of sites, at a smaller scale than potentially considered on the Hoo Peninsula:

- Rainham and Capstone Valley – 2280 homes, new secondary school at Hempstead, and primary schools, community facilities including health services, community centre and library provision; parks and open spaces.
- Mill Hill stadium development – 850 homes, football stadium, retail and leisure facilities
- Medway Valley – 180 homes, with investment in education, health and community services, transport, and open space

Appendix 1D – Rural focus

Legend

- Mixed use development
- Lodge Hill
- Expanded villages
- Estate renewal
- Existing retail centre
- New / improved retail centre
- New / enhanced employment land (828 ha)
- Urban area
- Green infrastructure
- M2
- Main roads
- Railway
- Rail station

Scenario 4 Urban regeneration and a rural town

This approach brings together components of the urban regeneration, suburban expansion and rural development scenarios. It includes elements of building at higher densities in waterfront and urban centre sites in Chatham and Strood, and seeking opportunities to consolidate development sites in these urban areas and for estate renewal schemes. It considers that land at Medway City Estate and Chatham Docks may take time to come forward for mixed use redevelopment schemes within the plan period, given the complexity of land assembly, relocation of existing business uses, land preparation and infrastructure works.

Suburban expansion is supported to a level that could deliver sustainable and healthy urban extensions, but restricted in scale to prevent the risk of urban sprawl and unsustainable travel patterns. In this approach, sufficient land is identified in urban and greenfield sites to avoid the release of land in the Green Belt to the west of Strood.

The development of Hoo St Werburgh into a small rural town and the potential for development at Lodge Hill are supported to deliver homes, in coordination with transport upgrades, improvements in services and facilities, and the delivery of new employment and retail space. Significant green infrastructure investments through new country parks could contribute to securing the distinct character of the peninsula and enhancing public access to the countryside.

The key components could deliver:

Urban regeneration including development at Chatham Docks, Medway City Estate, Chatham and Strood waterfront and central areas, Mill Hill, and estate renewal in Tywdall, could deliver:

- 6500 homes
- New sites for employment, retail and leisure uses
- Strengthen role of town centres
- Significant investments in transport networks, and wider infrastructure, including secondary and primary schools, health and community centres, and open spaces and public realm.

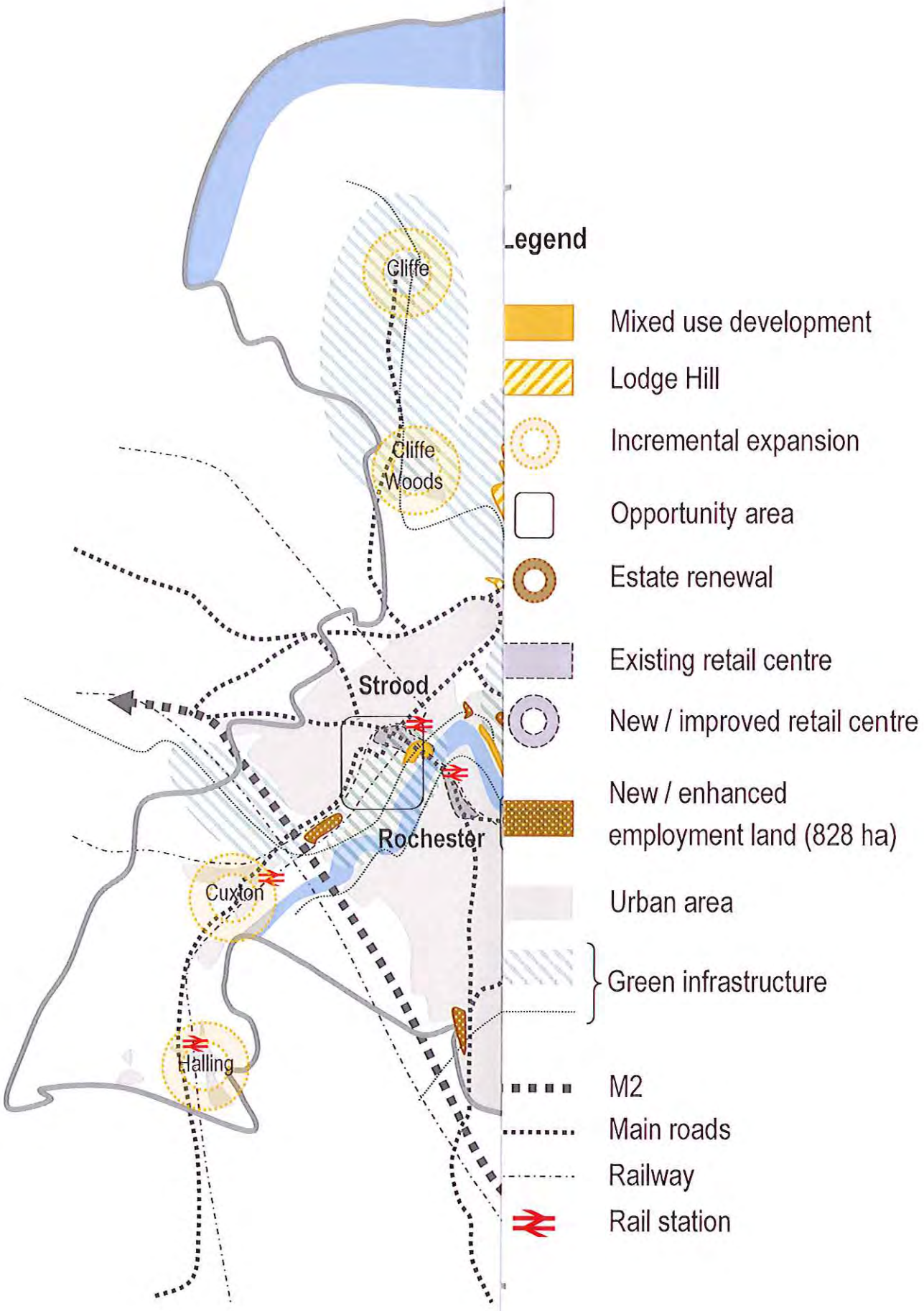
A rural town for the Hoo Peninsula could deliver:

- Lodge Hill – up to 3000 homes, schools, community facilities, including health and community centre provision, employment space, retail, leisure and open space and country park.
- Hoo St Werburgh – growth as a small rural town providing up to 6500 homes, supported by transport investment, a new retail centre and employment land, schools, community facilities, including health and community centres, and open space and country parks.
- Incremental growth in villages delivering up to 650 homes and supporting services.

Smaller scale suburban expansion could deliver:

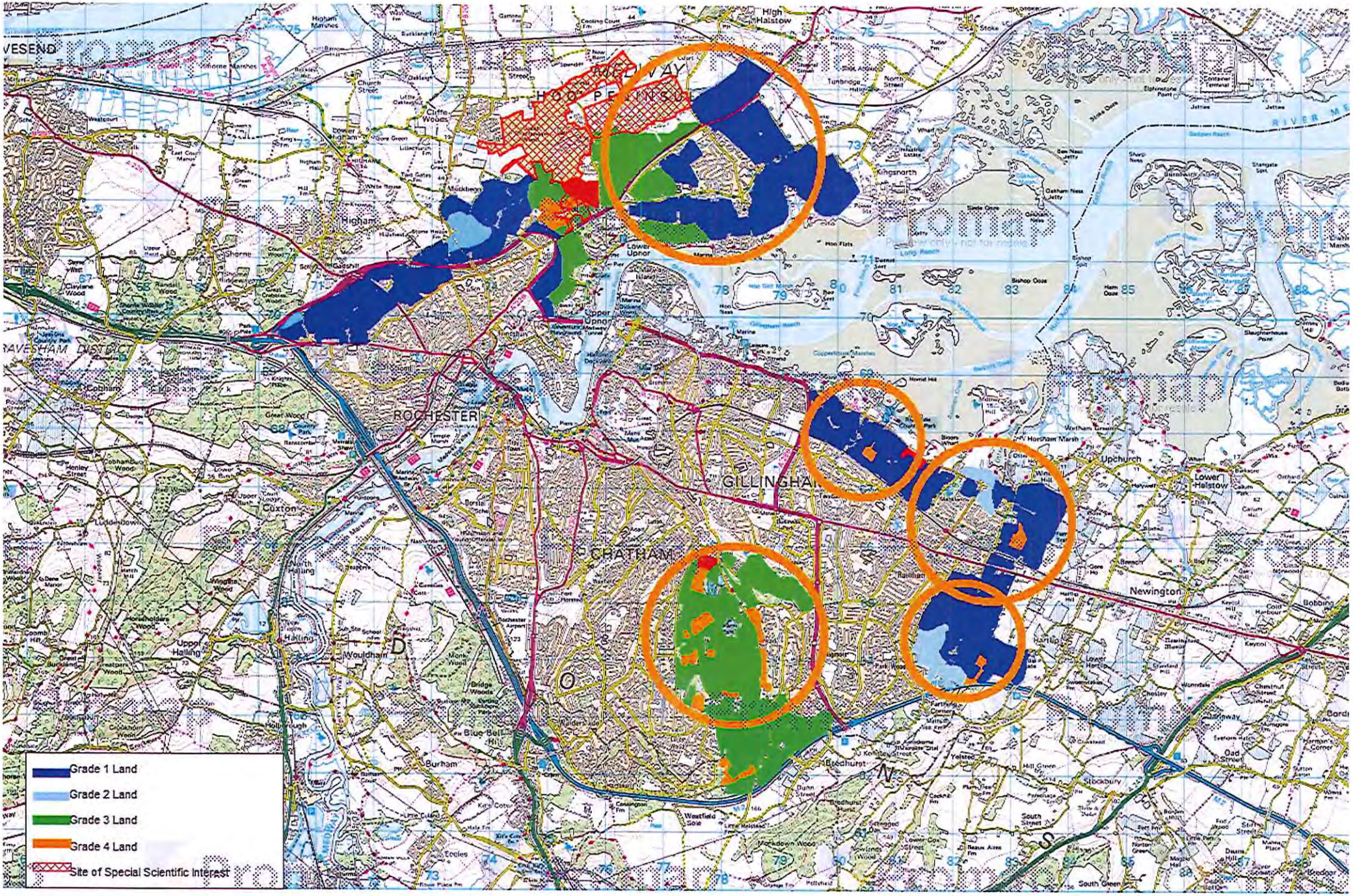
- Up to 2000 homes at locations near Rainham and Capstone, supported by investments in transport, services and green infrastructure
- Land for employment and key services, including schools and health.

Appendix 1E – Urb



APPENDIX 2

MAFF LAND CLASSIFICATION AROUND THE MEDWAY AREA


Grade 1 Land
Grade 2 Land
Grade 3 Land
Grade 4 Land
Site of Special Scientific Interest
ROCHESTER
CHATHAM
GILLINGHAM
Higham
Cobham
Cuxton
Upper Halling
Wouldham
Burham
Lower Upnor
Upper Upnor
Hoo Flats
Kingsnorth
Upchurch
Lower Halstow
Newington
Bredhurst
Stockbury
Hoo Peninsula

APPENDIX 3

NPPF – PARA 112

overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and

- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

110. In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.

111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.

112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

113. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites,[24] so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.

114. Local planning authorities should:

- set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and

- maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast.

115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important

24 Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

APPENDIX 4

NATURAL ENGLAND TECHNICAL INFORMATION NOTE TIN049

Natural England Technical Information Note TIN049

Agricultural Land Classification: protecting the best and most versatile agricultural land

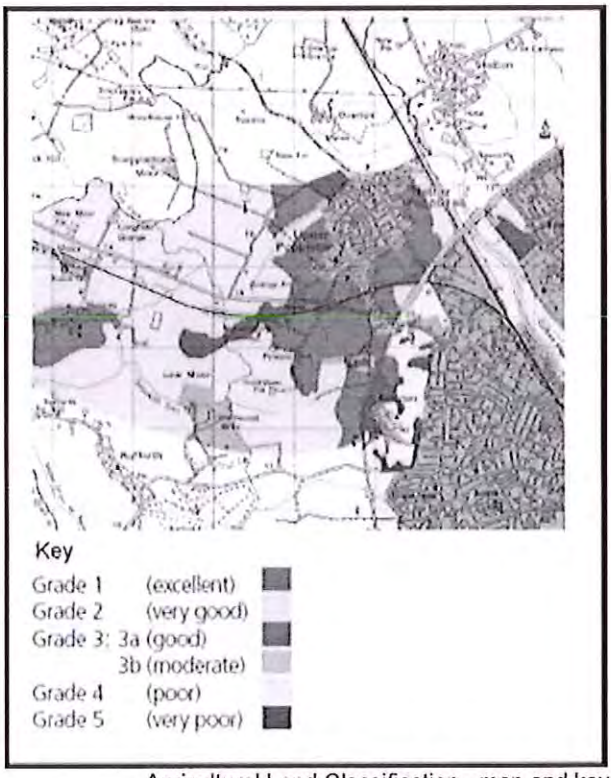
Most of our land area is in agricultural use. How this important natural resource is used is vital to sustainable development. This includes taking the right decisions about protecting it from inappropriate development.

Policy to protect agricultural land

Government policy for England is set out in the National Planning Policy Framework (NPPF) published in March 2012 (paragraph 112). Decisions rest with the relevant planning authorities who should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. The Government has also re-affirmed the importance of protecting our soils and the services they provide in the Natural Environment White Paper The Natural Choice:securing the value of nature (June 2011), including the protection of best and most versatile agricultural land (paragraph 2.35).

The ALC system: purpose & uses

Land quality varies from place to place. The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It helps underpin the principles of sustainable development.



Agricultural Land Classification - map and key

Second edition 19 December 2012
www.naturalengland.org.uk

NATURAL ENGLAND

Agricultural Land Classification: protecting the best and most versatile agricultural land

The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non food uses such as biomass, fibres and pharmaceuticals. Current estimates are that Grades 1 and 2 together form about 21% of all farmland in England; Subgrade 3a also covers about 21%.

The ALC system is used by Natural England and others to give advice to planning authorities, developers and the public if development is proposed on agricultural land or other greenfield sites that could potentially grow crops. The Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended) refers to the best and most versatile land policy in requiring statutory consultations with Natural England. Natural England is also responsible for Minerals and Waste Consultations where reclamation to agriculture is proposed under Schedule 5 of the Town and Country Planning Act 1990 (as amended). The ALC grading system is also used by commercial consultants to advise clients on land uses and planning issues.

Criteria and guidelines

The Classification is based on the long term physical limitations of land for agricultural use. Factors affecting the grade are climate, site and soil characteristics, and the important interactions between them. Detailed guidance for classifying land can be found in: *Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land* (MAFF, 1988):

- **Climate:** temperature and rainfall, aspect, exposure and frost risk.
- **Site:** gradient, micro-relief and flood risk.
- **Soil:** texture, structure, depth and stoniness, chemical properties which cannot be corrected.

The combination of climate and soil factors determines soil wetness and droughtiness. Wetness and droughtiness influence the choice of crops grown and the level and consistency of yields, as well as use of land for grazing livestock. The Classification is concerned with the inherent potential of land under a range of farming systems. The current agricultural use, or intensity of use, does not affect the ALC grade.

Versatility and yield

The physical limitations of land have four main effects on the way land is farmed. These are:

- the range of crops which can be grown;
- the level of yield;
- the consistency of yield; and
- the cost of obtaining the crop.

The ALC gives a high grading to land which allows more flexibility in the range of crops that can be grown (its 'versatility') and which requires lower inputs, but also takes into account ability to produce consistently high yields of a narrower range of crops.

Availability of ALC information

After the introduction of the ALC system in 1966 the whole of England and Wales was mapped from reconnaissance field surveys, to provide general strategic guidance on land quality for planners. This Provisional Series of maps was published on an Ordnance Survey base at a scale of One Inch to One Mile in the period 1967 to 1974. These maps are not sufficiently accurate for use in assessment of individual fields or development sites, and should not be used other than as general guidance. They show only five grades: their preparation preceded the subdivision of Grade 3 and the refinement of criteria, which occurred after 1976. They have not been updated and are out of print. A 1:250 000 scale map series based on the same information is available. These are more appropriate for the strategic use originally intended and can be downloaded from the Natural England **website**. This data is also available on 'Magic', an interactive, geographical information website **http://magic.defra.gov.uk/**.

Since 1976, selected areas have been re-surveyed in greater detail and to revised

guidelines and criteria. Information based on detailed ALC field surveys in accordance with current guidelines (MAFF, 1988) is the most definitive source. Data from the former Ministry of Agriculture, Fisheries and Food (MAFF) archive of more detailed ALC survey information (from 1988) is also available on **http://magic.defra.gov.uk/**. Revisions to the ALC guidelines and criteria have been limited and kept to the original principles, but some assessments made prior to the most recent revision in 1988 need to be checked against current criteria. More recently, strategic scale maps showing the likely occurrence of best and most versatile land have been prepared. Mapped information of all types is available from Natural England (see *Further information* below).

New field survey

Digital mapping and geographical information systems have been introduced to facilitate the provision of up-to-date information. ALC surveys are undertaken, according to the published Guidelines, by field surveyors using handheld augers to examine soils to a depth of 1.2 metres, at a frequency of one boring per hectare for a detailed assessment. This is usually supplemented by digging occasional small pits (usually by hand) to inspect the soil profile. Information obtained by these methods is combined with climatic and other data to produce an ALC map and report. ALC maps are normally produced on an Ordnance Survey base at varying scales from 1:10,000 for detailed work to 1:50 000 for reconnaissance survey

There is no comprehensive programme to survey all areas in detail. Private consultants may survey land where it is under consideration for development, especially around the edge of towns, to allow comparisons between areas and to inform environmental assessments. ALC field surveys are usually time consuming and should be initiated well in advance of planning decisions. Planning authorities should ensure that sufficient detailed site specific ALC survey data is available to inform decision making.

Consultations

Natural England is consulted by planning authorities on the preparation of all development plans as part of its remit for the natural environment. For planning applications, specific consultations with Natural England are required under the Development Management Procedure Order in relation to best and most versatile agricultural land. These are for non agricultural development proposals that are not consistent with an adopted local plan and involve the loss of twenty hectares or more of the best and most versatile land. The land protection policy is relevant to all planning applications, including those on smaller areas, but it is for the planning authority to decide how significant the agricultural land issues are, and the need for field information. The planning authority may contact Natural England if it needs technical information or advice.

Consultations with Natural England are required on all applications for mineral working or waste disposal if the proposed afteruse is for agriculture or where the loss of best and most versatile agricultural land agricultural land will be 20 ha or more. Non-agricultural afteruse, for example for nature conservation or amenity, can be acceptable even on better quality land if soil resources are conserved and the long term potential of best and most versatile land is safeguarded by careful land restoration and aftercare.

Other factors

The ALC is a basis for assessing how development proposals affect agricultural land within the planning system, but it is not the sole consideration. Planning authorities are guided by the National Planning Policy Framework to protect and enhance soils more widely. This could include, for example, conserving soil resources during mineral working or construction, not granting permission for peat extraction from new or extended mineral sites, or preventing soil from being adversely affected by pollution. For information on the application of ALC in Wales, please see below.

Further information

Details of the system of grading can be found in: *Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land* (MAFF, 1988).

Please note that planning authorities should send all planning related consultations and enquiries to Natural England by e-mail to **consultations@naturalengland.org.uk**. If it is not possible to consult us electronically then consultations should be sent to the following postal address:

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
CREWE
Cheshire
CW1 6GJ

ALC information for Wales is held by Welsh Government. Detailed information and advice is available on request from Ian Rugg (**ian.rugg@wales.gsi.gov.uk**) or David Martyn (**david.martyn@wales.gsi.gov.uk**). If it is not possible to consult us electronically then consultations should be sent to the following postal address:

Welsh Government
Rhodfa Padarn
Llanbadarn Fawr
Aberystwyth
Ceredigion
SY23 3UR

Natural England publications are available to download from the Natural England website: **www.naturalengland.org.uk**.

For further information contact the Natural England Enquiry Service on 0300 060 0863 or e-mail **enquiries@naturalengland.org.uk**.

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APPENDIX 5

FURNEAUX REPORT OF OCTOBER 2000

FURNEAUX & CO
SOIL AND LAND MANAGEMENT CONSULTANTS
ESTABLISHED 1946

MEDWAY LOCAL PLAN

Agricultural Land Classification of some 160 hectares (400 acres) north of the M2 motorway between Walderslade and Hempstead and farmed by F D Attwood & Partners

DIRECTOR ALAN FURNEAUX CDA (WRITTLE) FBIAC MIPSS
LANDENS · AVIEMORE ROAD · CROWBOROUGH · EAST SUSSEX · TN6 1QU
TELEPHONE AND FAX 01892 653905 VAT NO 210 7392 83

MEDWAY LOCAL PLAN

Agricultural Land Classification of some 160 hectares (400 acres) north of the M2 motorway between Walderslade and Hempstead and farmed by F D Attwood & Partners

by

Alan Furneaux, CDA (Writtle), FBIAC, MIPSS
Soil and Land Management Consultant

1. QUALIFICATIONS

1.1 I practise as a soil surveyor and consultant from Crowborough, East Sussex. I hold the Diploma in Agriculture of the Writtle Agricultural College, Essex. I am a Fellow of the British Institute of Agricultural Consultants and a Member of the Institute of Professional Soil Scientists. My work is concerned with the examination in the field of the problems of the utilisation and management of soils, of land draining, land reclamation, etc, and in giving advice upon them. Since 1962, I have carried out soil surveys in many parts of Britain on behalf of farmers, local authorities and public bodies.

2. SURVEY OF THE LAND

2.1 On 6 October 2000, I carried out a soil and agricultural land classification (ALC) survey of some 160 hectares (400 acres) situated north of the M2 motorway, between Walderslade and Hempstead, which is farmed by F D Attwood & Partners.

2.2 The survey entailed walking over this arable land to observe its condition while, in order to examine the physical nature of the soil, I made 55 soil auger borings, and a few shallow soil pits were dug with a spade. (The approximate locations of these soil observation points are shown upon the attached plan on Page 5).

2.3 On the inch per mile Agricultural Land Classification (ALC) Map, Sheet No 172, this area is shown to comprise entirely of Grade 3 land. However, the land survey upon which this classification is based was essentially of a reconnaissance nature and, at a scale of an inch to the mile, tends not to delineate areas of different grades extending to less than 80 hectares (200 acres). Furthermore, these ALC maps do not sub-divide the broad Grade 3 classification into its constituent sub-grades, namely 3A and 3B. For these reasons, the current more detailed ALC survey was undertaken.

3. AGRICULTURAL LAND CLASSIFICATION (ALC)

3.1 The location of the soil investigation points (namely profile pits and soil auger borings) are shown upon the attached plan on Page 5, which also illustrates the general distribution of the ALC grades. The following are the approximate percentages of the site within the various land grades:

ALC Grade 3A Approx 25 %

" " 3B " 70 %

" " 4 " 5 %

3.2 The assessment of the farming quality of the land has been based upon the criteria contained in MAFF (1988) Agricultural Land Classification of England and Wales, 'Revised guidelines and criteria for grading the quality of agricultural land', coupled with the Met Office's (1989) climatological data for agricultural land classification.

3.3 The ALC grade or sub-grade of land is determined by physical factors such as climate, site (gradient and micro-relief), soil, or inter-actions between them, namely soil wetness or droughtiness, the specific grade being determined by the most limiting factor present.

3.4 The farming quality of the land here varies mainly according to the following limitations:

(i) stone content of the topsoil

(ii) soil depth

(iii) land gradient

4. THE SIGNIFICANCE OF THE AGRICULTURAL LAND CLASSIFICATION IN ITS REGIONAL AND LOCAL CONTEXT

4.1 "More than 90% of Kent's agricultural land is in the top three grades* of the Ministry of Agriculture, Fisheries and Food (MAFF) agricultural land classification, and the country accounts for nearly 3% of agricultural land in England. Kent has a far higher proportion of Grade 1 land than any other county in the South East Region, and a higher proportion of Grade 2 land" (see para 7.62 of the Kent Structure Plan)

* Top three grades = 1, 2 & 3 (including 3A & 3B)

4.2 With agricultural land in England and Wales being divided into five grades and the middle Grade 3 sub-divided into two, there are in fact six separate land grades; the middle, or medium, quality land being 3A/3B. Nevertheless, in Lowland Britain, there is a preponderance of land within the upper grades, namely 1, 2 and 3A. The reverse is so in Upland Regions of the country, where seldom is the land quality above Grade 3B.

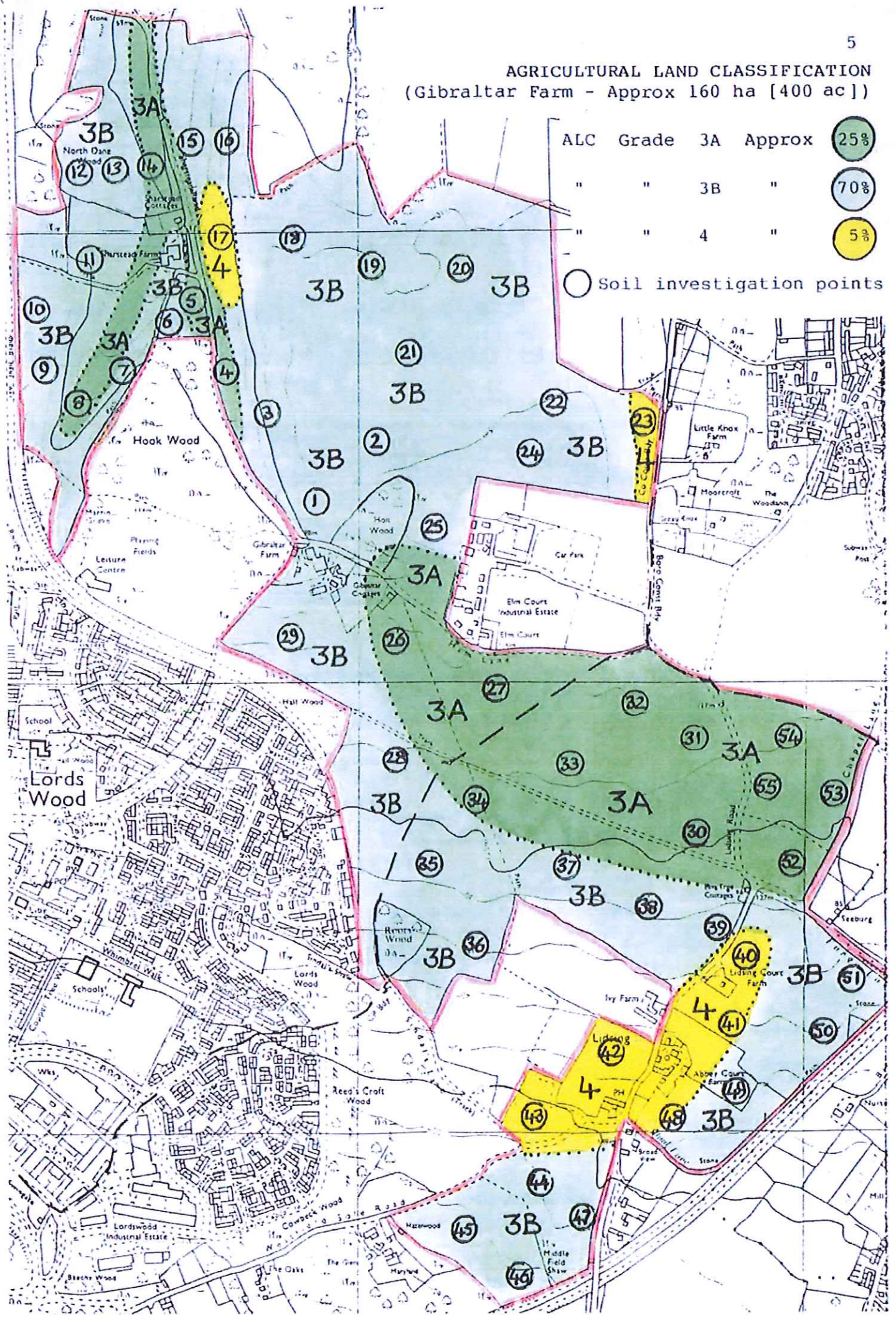
4.3 Therefore, with about 75% of the land here below Grade 3A, this is well below average quality for the South East Region as a whole, and for its size (ie 160 ha), it is probably some of the poorest land is this part of Kent, where there is a particularly high proportion of Grade 1 and 2 land, as illustrated upon the local ALC maps Nos 171 and 172. Furthermore, from my experience, most of the land shown as Grade 3 on these maps is largely of Grade 3A quality.

ALAN FURNEAUX
October 2000

AGRICULTURAL LAND CLASSIFICATION
(Gibraltar Farm - Approx 160 ha [400 ac])

ALC	Grade	3A	Approx	25%
"	"	3B	"	70%
"	"	4	"	5%

○ Soil investigation points



DESCRIPTION OF THE GRADES AND SUBGRADES

Grade 1 - excellent quality agricultural land

Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown which commonly include top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality.

Grade 2 - very good quality agricultural land

Land with minor limitations which affect crop yield cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high, but may be lower or more variable than Grade 1.

Grade 3 - good to moderate quality agricultural land

Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in Grades 1 and 2.

Subgrade 3a - good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.

Subgrade 3b - moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.

Grade 4 - poor quality land

Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (eg cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there are likely to be difficulties in utilisation. The grade also includes very droughty arable land.

Grade 5 - very poor quality agricultural land

Land with very severe limitations which restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.

[redacted]
telephone [redacted] email [redacted]

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

6 March 2017

Dear Sirs,

Medway Council Local Plan 2012-2035

1. Introduction

I found much to agree with – and equally as much to argue with – in the draft Local Plan. There is simply too much for the average resident to take in and comment on so I've restricted my remarks to a few issues which to my mind stand out. Chief of these is the topic of Sites of Special Scientific Interest, where I think the council have got things very wrong. I've used chapter, section and paragraph numberings from the document for identification of the extracts I am citing.

2. Perceived Status

2.3 Medway is similar in size to cities such as Brighton & Hove and Plymouth. However Medway does not enjoy either the recognition, or the range of services and facilities that of a city of this scale warrants.

I am confused as to whether this is a complaint or a statement of fact. Perhaps there's an element of both. Does the failure to obtain city status have any real effect on how Medway is perceived by those inside and outside it ? Medway is described as a city throughout the plan. Most would accept this as a more convenient description than 'conurbation and unitary authority', even if City with a capital C might be preferred.

Perhaps Medway hasn't received the recognition it might deserve because it hasn't yet developed the cohesion that Brighton & Hove and Plymouth enjoy. It remains in many ways a grouping of a number of entities all of which wish to retain their individuality. The name, though no doubt inevitable, isn't a winner. All other places with a river's name as a base, e.g. Exeter, Dartford, have an extension to the name of their rivers.

Medway has many features to be proud of, but certainly "makes do" in many instances. Our hundred and twelve year-old hospital has had countless modifications and extensions. There's no concert hall that attracts major orchestras. One can only look at Dartford and Canterbury to feel that we somehow come off second best. We do have a football team, but no Medway United.

3. Dockyard Closure

2.6 Medway's economy is recovering from the closure of the Dockyard in the 1980s, which dealt a severe blow to the local area.

I believe that this statement should be removed as it's no longer relevant. The Dockyard closed 33 years ago. In a shorter length of time this country managed to prosecute two world wars. In his 2014 report, Professor Richard Scase, of the University of Kent, claimed the area had benefited from the closure economically, socially and culturally, and the government had been "forced" to invest in, and to encourage regeneration. "I can't think of another community in the country where the reduction in unemployment has been so rapid over a 30-year period of time".

4. Below Average Performance

5.29 There are strong cultural associations with Charles Dickens, extending from historic Rochester to the atmospheric marshes of the Hoo Peninsula.

It's next to impossible to keep Mr Dickens out of anything to do with this area and 'atmospheric marshes' remind me of 'Great Expectations'. I'm afraid that one of our most pressing problems is the 'Low Expectations' that have led to such poor performance in many areas. This is implicitly accepted in the extract below.

"2.5 Medway's economy lags behind both the county and national averages. Productivity runs at two thirds of the national performance, and skills levels are notably lower in Medway. Medway's productivity measured by GVA (Gross Value Added) is the lowest in the South East region. Despite being the largest city in Kent and one of the largest in the South East region, Medway fails to punch at its weight."

A specific instance of poor performance was illustrated in data published last week about the drop-out rates for apprenticeships, with Medway showing up badly. I believe the local plan should give more attention to the causes of such inadequate performance and propose ways of bringing results up to at least national average level. Prospective investors or employers will not be persuaded to support Medway without evidence that action is being taken and proving successful.

2.4 "Medway benefits etc. . . There are marked inequalities in health, with life expectancy shorter for our residents. Medway is often unfairly associated with negative perceptions. The town centres are not always seen as attractive destinations and vibrant hubs for community activities."

There are certainly many spheres in which Medway earns low marks and I don't believe that the Local Plan places enough emphasis on initiatives to correct the situation.

Medway's Cultural Strategy 2014-2019 has as one of its priorities:
• "Wellbeing – increase active participation to address obesity, mental and spiritual health, promoting active minds, bodies and lifestyles and seeking to address social isolation." This policy needs beefing up.

It is <u>not</u> unfair to suggest that Medway suffers from negative perceptions. As an example, Medway regrettably appears to have one of the highest prevalence of smoking, 22.3% as opposed to a national average of 18%. Something is reportedly being done about this. Medway has an alcohol problem but there is belatedly a health improvement project in progress. Better by far to admit that there are problems that affect individual and communal well-being.

As for the perceived attractiveness of town centres, the flight of retail to out-of-town sites, Hempstead Valley and Blue Water has left town centres short of inducements to visit them. This has led to an overall drop in the quality of what's on offer during daytime. A few short walks would illustrate the problem. Several areas in Medway provide an attractive evening ambiance and the Plan mentions ambitions to build on this. The Plan should not, however, shy away from acknowledging the damage that a sub-standard night-time economy does to the evening economy that is enjoyed by residents, visitors and families.

5. Natural Environment and Green Belt

Paragraph 7.2. summarises the scope and importance of parts of the natural environment within Medway. Sites of Special Scientific Interest, however, receive only one mention in the whole of Chapter 7, which is surprising given that they cover such a large proportion of the area of land given special protection.

7.2 The area's environmental quality is recognised as being nationally and internationally important with 28% designated as a Special Protection Area and a third of the land area is designated as Sites of Special Scientific Interest. It also includes land in the Kent Downs Area of Outstanding Natural Beauty (AONB).

In other chapters the plan is almost over-supplied with protestations of Medway's commitment to protection of the natural environment. The following are representative examples.

Executive summary
By 2035, Medway will be a leading waterfront University city of 330,200 people, noted for its revitalised urban centres, and its stunning natural and historic assets, and countryside.

1.1 The aim of the Local Plan is to ensure that Medway grows sustainably, and to provide land for the homes, jobs and services that people need, whilst protecting and enhancing the qualities of the area's environment.

2.1 Much of the countryside and estuary is of international importance for its environmental qualities.

3.11 A particular characteristic of Medway is the high proportion of land covered by environmental designations where development should be restricted. This includes wide swathes of the Hoo Peninsula, covered by Ramsar, Special Protection Area and Site of Special Scientific Interest designations.

5.41 "Medway's high quality countryside is an important tourist asset, . . . However, developments need to be sensitive to the special characteristics of the countryside and Medway's rural environments, particularly the extensive areas designated of wildlife and landscape importance."

7.4 A key feature of Medway is the extent of areas that are designated of international or national importance for their biodiversity and landscape value. These indicate areas where development should be restricted in order to protect their special characteristics as outlined above.

7.15 The environment is central to the ambitions for Medway's sustainable growth. The council recognises the challenges of accommodating the needs of the area's growing population alongside safeguarding the special characteristics of the local environment. The Local Plan will set out the council's commitment to protecting biodiversity, valued landscapes and geological conservation interests.

Policy Approach: Securing strong Green Infrastructure
The council will protect the network of green infrastructure across rural and urban Medway. ***The highest protection will be given to securing the ecological and landscape interests of sites designated of international importance as a Special Protection Area, Ramsar site and/or Special Area of Conservation. A high level of protection from damaging impacts of development will be given to Sites of Special Scientific Interest and Ancient Woodland.***

There are many more instances in the plan of Medway's aim of protecting and preserving the natural environment, but more than enough have been cited to emphasise the point. Anyone reading the above – and more in the draft Plan besides – would surely be convinced that

Medway Council was passionate in its determination to see that no harm comes to some very important natural environment and threatened species.

Here's a summary of the 5 SSSIs within Medway.

Medway Estuary and Marshes

- Not much chance of development there, unless the airport nonsense starts up again. Anyway, this is also a designated SPA and a Ramsar site.

Tower Hill to Cockham Wood

- Steep ground, old quarry and shoreline, not much suited to development. Not mentioned anywhere in the draft Local Plan.

Northward Hill

- Northward Hill is also a National Nature Reserve managed by the RSPB so has a further level of protection.

Dalham Farm

- Natural England gives eleven reasons why the ground shouldn't be disturbed – quite scary. It's clear that this unstable area can never be developed.

Chattenden Woods and Lodge Hill

- This SSSI (I quote) "comprises a mosaic of habitats, including ancient and other long-established semi-natural woodland, scrub, and neutral grassland. It is a nationally important site specifically by reason of the following biological features of special interest that occur within and are supported by the wider habitat mosaic". The features of most interest include woodland, grassland, nightingales (in nationally important number),a large range of other birds and great crested newts.

It's now time to see how the claims about protecting the natural environment stand up against the demands of land development for housing and other uses. The first four SSSIs listed don't seem to be suitable for development, so emphasis inevitably falls on the fifth, Chattenden Woods and Lodge Hill.

6. Delivering Sustainable Development – Options

The Local Plan includes the following four scenarios for sustainable development.

1. *Maximising urban regeneration opportunities*
2. *Supporting suburban expansion at a significant scale*
3. *Promoting development on the Hoo Peninsula*
4. *Securing urban regeneration and a rural town*

Reading Chapter 3, Delivering Sustainable Development – Options, it became clear that Scenario 1 meant exactly what it said*, "a major transformation in the urban centre".* All the areas that might be subject to regeneration were mentioned. No areas of natural environmental importance are included.

Scenario 2, Suburban Expansion, states,
"it is likely that a proportion of development would also need to be accommodated in the rural areas of the Hoo Peninsula. This includes incremental growth in a number of villages and expansion around the large village of Hoo St Werburgh."

Scenario 3, Hoo Peninsula focus, mentions among other points:
3.33 In this scenario, the Hoo Peninsula is considered as a potential location for growth. A key strand of this scenario is the expansion of the large village of Hoo St Werburgh into a small rural town. This would involve development in neighbourhoods around the wider area, including Chattenden, Deangate and Lodge Hill. As a large village in a rural area, both Hoo St Werburgh and the wider Hoo Peninsula have limited services in comparison with the Medway towns.

Scenario 4: Urban Regeneration and a Rural Town
3.41 This brings together components of the urban regeneration, suburban expansion and rural development scenarios set out above.

When reviewing the Plan I chose to download and use the Full Development Options Consultation Document. Under each Scenario heading in Chapter 3 one is invited to see strategic diagram set out at Appendix 1B, etc. All of these Strategic Diagrams show Lodge Hill in a variety of colours, but it's not clear how these should be interpreted. Lodge Hill, after all, has only been mentioned in Scenario 3 of Chapter 3.

If I had not by chance opened other on-line documents I would never have become aware of the following data with respect to the number and location of houses in each scenario. The omission of such important information from the full document seems to me highly questionable – and I trust was not intended.

Scenario 1: Urban regeneration
Redevelopment of Medway City Estate and Chatham Docks could provide up to 5000 homes
Extended regeneration in urban areas could deliver 5500 homes
Suburban and rural growth, up to 7000 homes
Total: 17,500 homes

Scenario 2: Suburban expansion
Suburban development around Rainham, Capstone and Strood, 10,700 homes
Lodge Hill, up to 3000 homes
Expansion of Hoo St Werburgh, 2000 homes
Smaller scale growth of villages, 900 homes
Total: 16,600 homes

Scenario 3: Hoo Peninsula focus
A rural town based around Hoo St Werburgh, 6500 homes
Lodge Hill – up to 3000 homes
Expanded villages – Cliffe, Cliffe Woods, High Halstow, etc. 2600 homes
Rainham and Capstone Valley, 2280 homes
Mill Hill stadium development – 850 homes
Medway Valley – 180 homes
Total: 15,410 homes

Scenario 4: Urban Regeneration and a Rural Town
Urban regeneration could deliver: 6500 homes
Lodge Hill, up to 3000 homes
Hoo St Werburgh, up to 6500 homes
Incremental growth in villages, up to 650
Locations near Rainham and Capstone, up to 2000 homes
Total, 18,650 homes

Surely Medway Council would not have intended to conceal from the casual enquirer the fact that Lodge Hill is anticipated to provide about 10 percent of the housing in three of the four scenarios under consideration. Making it what one might describe as a "Banker".

The MoD planning application, approved by the Council in September 2014, which was 'called in' by the Secretary of State, will be examined by a planning inspector at a Public Inquiry, scheduled to be held in March 2018. I find it very hard to understand how the Council feels able to make the assumption that the inspector will find in its favour. There must be a stand-by position to cover the eventuality that planning permission will not be granted. Perhaps the Local Plan should be held in abeyance until the inspector has made a determination.

7. Conclusions

I can understand the benefits that accrue from developing a large area rather than several small ones, but I'm equally aware of the drawbacks such as extra stresses on inadequate infrastructures. I believe that the housing opportunities that Lodge Hill offers come a too high a price to allow them to be retained in the Plan. It would be to the Council's credit were it to

make good its assertions that one of its aims is (see Section 5) to protect the natural environment, especially SSSIs – especially since Chattenden Woods and Lodge Hill is the only one that is really being referred to. As instanced by earlier comments, the Council's reliance on the Lodge Hill site to provide 3,000 homes would seem to be totally inconsistent with the authority's pledge to protect sensitive and nationally important environmental assets.

This glaring contradiction surely requires the Council to amend this part of the Plan to protect and preserve the Lodge Hill historic woodland and environment reflected in its internationally protected designation. To ignore this would inevitably cast great doubt on the Council's ability to implement the core approach to the rest of its environmental policy.

I look forward to seeing new scenarios in which only very limited development to the north-west of the A228 is envisaged and protection for Chattenden Woods and Lodge Hill is maintained for the benefit of our community.

Yours faithfully,

Ian McLeod

Planning Policy Department
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

By email
futuremedway@medway.gov.uk

13 April 2017

let.003..DH.00030318

Dear Sir/Madam

DRAFT LOCAL PLAN 2012-2035 – DEVELOPMENT OPTIONS CONSULTATION

Indigo Planning act on behalf of Columbia Threadneedle Property Investment (Columbia Threadneedle), the owner of Gillingham Business Park, who are submitting representations in response to the above consultation. These representations have a particular focus on shaping the proposed economic strategy and policies.

Adopted policy ED1 restricts uses at Gillingham Business Park to B1 (business), B2 (industry) and B8 (storage/distribution) uses, and this is rigidly adhered to. Columbia Threadneedle considers that future policy relating to the business park should allow for flexibility, so that businesses that are complementary to those already in the park are able to locate there. This would increase its attractiveness and maximise the potential of the business park, whilst ensuring that its integrity as a focus for employment uses is not negatively affected.

The Development Options consultation document still deals with principle issues and does not propose any new policy wording for managing the employment sites in Medway. We therefore maintain the position set out in our previous Issues and Options representations, and reiterate that the new policies should be flexible enough to allow for a range of future uses/supporting development to complement the existing businesses. This would help to sustain the success of the Business Park over the long term. A summary of our previous points is as follows:

- There is a legitimate and welcome intention to stimulate economic growth by attracting new employment sectors and capitalising on established employment locations as a response to the decline of the industrial sector in the area;

- The new Local Plan will offer flexibility on sites to deliver a variety of employment uses in order to secure sustainable growth;

- New policies should allow for intensification and flexibility of uses at the Business Park, provided that they are complementary and do not harm its employment potential;

- Allowing flexibility and complementary uses would maximise the quality and attraction of an already successful business park; and

- Allowing flexibility at the Business Park would provide opportunities for tenants with greater value to occupy the park, which may currently be hindered by restrictive policy.

Regarding the current consultation, paragraph 5.20 of the consultation document's Employment chapter states that Gillingham Business Park could support a mix of employment formats. Columbia Threadneedle agrees with this and believe that allowing complementary uses would enhance the Business Park's employment offer and capitalise on its already successful performance. This accords with the Council's overarching aim for employment sites, and the vision of securing sustainable employment growth and economic development in Medway.

We suggest the following policy wording to reflect the points set out above:

"In the following Employment Areas:

• Chatham Maritime;
• Gillingham Business Park;
• Medway Innovation Centre and Compass Centre; and
• Rochester Airfield site

development will be permitted for a m ix of employment uses including B1a (office), B1b (Research and development/hi-tech industry) and B1c (light industry), B2 (General Industry) and B8 (storage and distribution), together with uses that would be complementary to the employment function of the Business Park. Proposals for such complementary uses should be supported by robust evidence and will be decided on a case by case basis."

We trust that these representations will be given due regard in the progression of the Local Plan, however should you have any queries please do not hesitate to contact us.

Yours faithfully

[redacted]

Aaron Peate

MEDWAY LOCAL PLAN.

[redacted]

Dear Sir/Madam,
After having studied the Development options, I wish to inform you of my opinion.

Firstly, I wish to make it known that as far as am concerned the Medway Towns is now at breaking point. We cannot cope with the current population, let alone adding to it!
The reasons are:-

#23FEB 2017

1) Medway Maritime Hospital is unable to cope now as you are well aware - it is already not large enough to support the current population. Even if another hospital is built, where will all the new nurses and doctors come from?
2) It is fine to say you will provide new Doctors Surgeries, but I have no idea where these new doctors will appear from - a number of local surgeries are already struggling to cope as doctors leave, retire etc. and there aren't enough new doctors coming through to replace them. My daughters Surgery, Kings Family Practice, in Chatham has a notice saying they are struggling to replace doctors and are currently shut Thursday afternoons so to say that doctors should work longer hours is it practical or possible at all.
3) We will need new transport links which I do believe you can actually provide - new road that will cut a swathe through the little countryside & green belt we have left.
Also public transport isn't up to scratch, there is nothing done to encourage people to use it & consequently there aren't good enough

Services stranded anyway.

4) The number of houses supposedly needed will mean, in general, twice that number of cars added to our roads – where is this traffic all to go? Where will everyone park? The roads are clogged up now with cars and people struggle to park.

5) Gas, electricity & water:-
How will you be able to sustain the extra supplies that will be needed to provide for the thousands of houses you intend to build? Over the last few years our water table has been of concern and we are already conserving water.

6) Schools:-
How can you possibly guarantee that even if you build more schools, you will be able to provide the teachers needed?

Now- Concerning your Development options:-
I do not approve of scenario 2, 3 or 4 as these all mention Lodge Hill, Chattenden, and as Lodge Hill is an SSSI - your plans defy national planning rules for protected wildlife sites as well as destroying the Nightingales last stronghold in the U.K.
The R.S.P.B, KWT, Friends of North Kent Marshes Medway Countryside forum, Butterfly Conservation & Woodlands Trust all oppose development at Lodge Hill. As our Council you should be thoroughly ashamed of the fact that you have even put this on your agenda and are trying to destroy the S.S.S.I status and have taken it to the Government – I now

have no trust in you as my local council because of this.
There are other factors in Scenario's 2, 3 & 4 that I disapprove of, namely regarding loss of Green Belt land, which we should not be able to build on.
This only leaves Scenario 1.
I have to consider that of the options you have given, this, IF I had to choose an option, would be the least destructive to firstly wildlife (ie. does not include Lodge Hill) and not so much Green Belt land would be taken and more Brownfield sites would be used.
My big question is - if you do not get approval to build at Lodge Hill, there appear to be no options but one left anyway - do you know something that we don't?
Finally, I wish to state that I am extremely worried about the need to build all these new houses as not enough will be affordable - the percentage is too low. All that will happen is that people from outside Medway will buy them and also will probably be put up for rent. Our younger generation have been sold down the river - they cannot get on the housing ladder as houses are ridiculously extortionate to buy and they need a large deposit and wages are low but renting is so expensive that they cannot then afford to save for their own property!

I believe the Majority of the housing Should be affordable and for local people only and we Should also have Council Housing as we used to do until they all disappeared in the 1980's.

It Seems to me that the young people of Medway will still be left in the Same position, while outsiders gain all the benefits.

Yours

J. Whitaker

Dear Sir / Madam,
I am writing in response to the Draft Vision and Strategic Objectives outlined in the Medway Council Local Plan 2012 – 2035 and I would like to raise the following concerns regarding the considered development at Cliffe, in particular the land between Chancery Road and Cooling Road and also the land adjacent to the Telephone Exchange and North to Buttway Lane.
Many of the concerns would also apply to Cliffe Woods as the main access to local towns from Cliffe is via Cliffe Woods and other aspects of the local infrastructure are also shared between the two villages.

Having had a look at a map of the local area, if the two main proposed sites at Cliffe were put forward for development, it would appear to me that this could potentially double the size of Cliffe which has far reaching implications for the village and any significant development would, I believe, have a negative impact on this treasured rural setting and substantially change its character.

There would be an impact on the local environment as currently the land is used for growing crops, land that is very high grade and valuable for growing food efficiently and building on land used for this purpose would also have an impact on Carbon absorption and drainage.

Cliffe has long been a farming community and the landscape and features relating to this should be respected as this is the reason many people live in the countryside for this type of scenery and rural setting. This rural setting is a direct contrast to living in towns or cities.

Regarding Agriculture in general, at a time when the Common Agricultural Policy and membership of the European Union is ,to say the least, 'under review', the majority of the UK's food is imported, there are millions of people in the UK in what could be considered Food Poverty, our import costs have the potential to rise considerably due to the exchange rate and potential import duty, the decision to destroy valuable food producing land at a time when the population is increasing significantly has serious implications as far as I am concerned.
I cannot understand why an exponentially growing population would choose to reduce its ability to grow food.

I believe there is a government directive to encourage the population to consume more fresh fruit and vegetables and to reduce Food Miles and its wider implication for the environment and so I believe Food Security is not something that should be taken lightly in an ever changing world and add to this the way the way climate appears to be changing, there must be less valuable land that could be considered for redevelopment.

Taking all of the above into consideration, valuable farming land and the skills of the farming community should not be taken for granted and the long term future way past 2035 should also be considered as once very fertile and productive soil is destroyed by development it is very difficult to regain.

Back on to a more local and personal level, if the fields between Chancery Road and Cooling Road were developed, the view from house of the countryside, farming land, the hills and woods in the distance would be completely obscured by any development in this area, a view that many others living adjacent to this land would also share. In my mind there is no better rural view than a field of ripened wheat and it is something I have looked forward to for as long as I can remember over the 45 years I have lived in the village and I greatly enjoy the fact that I can see my parents' house, my childhood home on the opposite side of the proposed development.

From a more practical point of view, the local infrastructure is already, in my opinion, at capacity.

The local school is full, the waiting time to see a GP has increased considerably recently, the single main road leading to Cliffe is narrow, the sewage system at the other side of Cliffe woods struggles to cope with the current population, the broadband and phone system in areas of Cliffe, in particular where I live, is unreliable due to out of date cable technology, mobile phone coverage is limited, there is no visual Police representation, facilities for young people are minimal to name a few examples.
The transport structure to the village is limited with an expensive taxi journey many times the only transport option, the roads or lanes are restricted, the shops are small, there are no big business' fancy coffee shops, cinemas or gyms and that is exactly how it should be.
Our local shopkeepers and landlords should all be treasured along with all the other features that make the villages what they are and which would be lost for ever if these areas were developed considerably.
All this considered, I accept that there are disadvantages to living in a relatively isolated community because the benefits of the local surroundings far outweigh factors that some people may consider to be unfavourable.

In summary, I believe, any significant development of Cliffe, Cliffe Woods and most likely the other rural villages on the peninsular would have a detrimental impact on their character, the local environment, the infrastructure, the countryside views and wildlife.
There are local implications regarding traffic generation, car parking, and general amenities with far wider implications for food security and the economy if such valuable land is destroyed to house a rapidly and uncontrollably growing population that relies on it for its own long term survival.

It is for the reasons above I would oppose any significant development at Cliffe, and Cliffe Woods for that matter as development spreads and if Cliffe woods is developed then Cliffe Will be next in line and it would only be a matter of time before all the countryside local to the two villages is consumed by development and roads.

Yours sincerely

Jason Pellatt 11/04/2017

Catherine Smith
Housing & Regeneration
Medway Council.

06 MAR 2017

[redacted]

2.3.17

Dear Ms Smith

Thank you for your letter with information concerning development plans for Medway

As you know, I have a house on about one third of an acre of land, which was originally a cherry orchard.

At various times since 2006 I have been approached by six companies interested in developing the plot. I have not responded as I was not ready to consider moving, but sometime in the next two, to three years. I shall be hoping to sell the plot with a view to 'down size'.

Medway Council contacted me some time ago, enquiring if I were interested in selling the plot here at Pump Lane & suggested that it may be large enough to accomodate seven houses.

It is a very desirable spot, a few yards from Rainham Grammar School, a gym & swimming pool close by in Bloors Lane and a short drive to the M2

I have looked at your Local Plan document and notice you will be hoping to develop the

area around Rainham.
I would be very interested to know if, in the near future it would be a building plot that you may give provisional planning permission for development.
If you would like to visit to assess the possibilities you would be very welcome.

Yours sincerely

Jennifer Smith

MEDWAY local PLAN.

01 MAR 2017

[redacted]

Dear Sir/Madam,
After having studied the Development options, I wish to inform you of my opinion.

Firstly, I wish to make it known that as far as I am concerned the Medway Towns is now at breaking point. We cannot cope with the current population, let alone adding to it!
The reasons are:-

1) Medway Maritime hospital is unable to cope now, as you are well aware - it is already not large enough to support the current population. Even if another hospital is built, where will all the new nurses and doctors come from?
2) It is fine to say you will provide new Doctors Surgeries, but I have no idea where these new doctors will appear from - a number of local surgeries are already struggling to cope as doctors leave, retire etc. and there aren't enough new doctors coming through to replace them! My surgery, Kings Family Practice, in Chatham has a notice saying they are struggling to replace doctors and are currently shut Thursday afternoons so to say that doctors should work longer hours isn't practical or possible at all.
3) We will need new transport links which I don't believe you can actually provide - new roads that will cut a swathe through the little countryside & green belt we have left.
Also public transport isn't up to scratch, there is nothing done to encourage people to use it & consequently there aren't good enough

Services stranded anyway.

4) The number of houses supposedly needed will mean, in general, twice that number of cars added to our roads - where is this traffic all to go? Where will everyone park? The roads are clogged up now with cars and people struggle to park.

5) Gas, electricity & water:-
How will you be able to sustain the extra supplies that will be needed to provide for the thousands of houses you want to build? Over the last few years our water table has been of concern and we are already conserving water.

6) Schools:-
How can you possibly guarantee that even if you build more schools, you will be able to provide the teachers needed?

Now- Concerning your Development options:-
I do not approve of scenario 2, 3 or 4 as these all mention Lodge Hill, Chattenden, and as Lodge Hill is an SSSI - your plans defy national planning rules for protected wildlife sites as well as destroying the Nightingales last stronghold in the U.K.
The R.S.P.B, KWT, Friends of North Kent Marshes, Medway Countryside forum, Butterfly Conservation & Woodlands Trust all oppose development at Lodge Hill. As our Council you should be thoroughly ashamed of the fact that you have even put this on your agenda and are trying to destroy the S.S.S.I Status and have taken it to the Government - I now

have no trust in you as my local council because of this.
There are other factors in Scenario's 2, 3 + 4 that I disapprove of, namely regarding loss of Green Belt land, which we should not be able to build on.
This only leaves Scenario 1.
I have to consider that of the options you have given, this, IF I had to choose an option, would be the least detrimental to firstly wildlife (ie. does not include Lodge Hill) and not so much Green Belt land would be taken and more Brownfield sites would be used.
My big question is - if you do not get approval to build at Lodge Hill, there appear to be no options but one left anyway - do you know something that we don't?
Finally, I wish to state that I am extremely worried about the need to build all these new houses as not enough will be affordable - the percentage is too low. All that will happen is that people from outside Medway will buy them and also will probably be put up for rent. Our younger generation have been sold down the river - they cannot get on the housing ladder as houses are ridiculously extortionate to buy and they need a large deposit and wages are low but renting is so expensive that they cannot then afford to save for their own property!

I believe the Majority of the housing Should be affordable and for local people only and we Should also have Council Housing as we used to do until they all disappeared in the 1980's.

It seems to me that the young people of Medway will still be left in the same position, while outsiders gain all the benefits.

Yours faithfully

Jim Puttock