

By Email: futuremedway@medway.gov.uk

NHS Property Services Ltd
85 Gresham Street
London
EC2V 7NQ

Date: 28th February 2017

www.property.nhs.uk

Dear Sir/Madam

NHS Property Services – Development Options Regulation 18 Consultation Report

Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).

Foreword

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

Section 9 – Policy Approach: Health (p.78)

When planning for new settlements, the Council should continue to work with NHS commissioners and providers to ensure that adequate healthcare infrastructure is provided to support new residential development.

Healthcare facilities are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The Council should therefore work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new settlements are sustainable.

Where extended or relocated health facilities are required to mitigate the impact of new development, health commissioners would require Section 106 / CIL funding towards the capital cost of delivering this infrastructure. An assessment of the appropriate mechanisms for delivering the required funding will need to be undertaken at an early stage in collaboration with the Council.

Section 10: Policy Approach: Community Facilities (p.84)

Faced with financial pressures, the NHS requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved services and facilities.

Restrictive policies that prevent the loss or change of use of ‘community facilities’ and include healthcare facilities within this definition can prevent or delay required investment in alternative facilities and work against the Council’s aim of providing essential services for the community. It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal.

An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing).

Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses), and should not be subject to restrictive policies or periods of marketing.

Yours sincerely



Mark Adams
Senior Town Planner (MRTPI) – NHS Property Services Ltd

From: Wouldham Parish Council <clerk@wouldhampc.co.uk>
Sent: 13 April 2017 10:27
To: futuremedway
Subject: Fwd: Medway Local Plan

Follow Up Flag: Follow up
Flag Status: Completed

RESPONSE TO THE MEDWAY LOCAL PLAN FROM WOULDHAM PARISH COUNCIL.

The population of Medway is set to increase from about 270000 to 330000 within the time frame of this plan (2035).

Wouldham's main concerns are **traffic** and **recreational use of the countryside** within our Parish, along with fly tipping etc.

We would like to encourage **liaison** between Medway and KCC regarding **limiting traffic** in our Parish.

We would like to comment that we would like **better signage** within Medway to ensure **HGV's** are directed along the primary routes wherever possible eg to the A228 or A229 to head south out of Medway...**not through Borstal.**

We would also like to see more mention of **cycling routes**, specifically development of a riverside Rochester to Maidstone route which could be used by commuters as well as for recreation, it has been included in previous Medway and TMBC plans. Many cyclists use the lower road and it is becoming increasingly dangerous.

--
Nicky Grimes
Clerk. **Wouldham Parish Council**

[REDACTED]

From: Wouldham Parish Council <clerk@wouldhampc.co.uk>
Sent: 18 April 2017 09:59
To: futuremedway
Subject: Response to Local Plan

FROM WOULDHAM PARISH COUNCIL

In addition to the comments I have already made, we would like to see HGV's actually banned from Priestfields and The Espanade/Shorts Way to stop them using Wouldham Rd on their way to Peters Bridge.

Regards

--
Nicky Grimes
Clerk. **Wouldham Parish Council**

[REDACTED]

From: Nicolette Davies [REDACTED]
Sent: 25 January 2017 20:57
To: policy, planning
Subject: Cliffe Woods

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam,

I am writing in response to the Medway Local Plan consultation document.

I am very concerned that the fields at the the end of our road, Ladyclose Avenue, Cliffe Woods, are being considered for a housing development. Obviously I am aware that those fields are the property of a farmer, who has every right to sell them if he so wishes. However, I have discovered that they are some of the last remaining Green Belt between Cliffe Woods and Higham marshes. In the Medway Local Planning document, Appendix 1. 7.17 the Green Belt, is given appropriate and valuable consideration. It would be so sad to build more houses in this area, as the views and open spaces would be lost for ever. Local people would lose the lovely landscape and the peace and quiet of this small village would disappear.

I am also very worried about the B2000 that carries traffic to a number of small villages in the vicinity, as it is already very busy and dangerous. If more people live here, then it will have even more traffic on it. When I try to cross it if walking to the shops or to the Doctors, or to drive out of Ladyclose Avenue, it is extremely difficult due to the amount of lorries and cars going along it at speed.

I wonder if the developers Gladman, have any knowledge or understanding about the impact on the infrastructure of hundreds of new houses. It is already difficult to get an appointment at the doctors and I understand that the local primary school is generally full. The resulting increase in the population would be sure to create a multitude of problems.

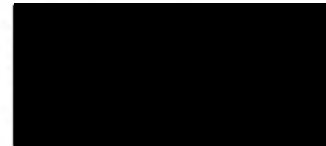
Obviously I do realise that this country needs more houses built for our ever increasing population and Medway Council must play their part for the sake of our country. I do seriously and sincerely hope, that you all make the right decision when it comes to Cliffe Woods. We all love it as it is and ask that you respect our peaceful environment. Please try to use up all the 'brown' sites in Medway, before resorting to building on 'green' sites.

Yours Faithfully,
Nicolette A. Davies.

Sent from my iPad

Planning Policy, Regeneration etc
Medway Council
Gun Wharf
Chatham ME4 4TR

24 FEB 2017



16 Feb 2017

MEDWAY COUNCIL LOCAL PLAN 2012 - 2035

Much of the content of the Local Plan summary fills us with dismay. The Hoo Peninsula cannot take the proposed number of dwellings in any of the Scenarios shown.

Firstly, the road to and from the Peninsula, the A228, struggles whenever there is a traffic incident or snow and ice.

What would happen in the case of emergency evacuation from the Isle of Grain?

At peak times like the school run, residents hesitate to drive out of the villages, Bells Lane for example, is like a race track with too many vehicles and not enough space. Residents in the new developments east of Bells Lane do not have sufficient parking places on their estates so they are forced to park in Bells Lane causing problems for everyone else. Drivers race to get through the traffic calming chicane, there are frequent near misses.

Secondly, our amenities are stretched already. The Surgery in Bells Lane has closed the list to new patients, it is not easy to get an appointment these days. The schools are oversubscribed, parking in the village is often difficult and at times impossible. This is especially true at school coming out time. We cannot cope with more cars in the village. Many of these points also apply to other villages on the Peninsula

Hoo Saint Werburgh is an old village. We retired here to enjoy our last years in a village setting, buying a Victorian cottage, a former farm labourers house. We love the open spaces, the fields that we can walk around, the paths to the river bank, the views across the estuary. When we first came here we enjoyed bird watching in our garden which backed onto orchards. Life was idyllic.

The long screen of poplar trees that bordered the orchard were cut down despite the developers promising to allow them to remain. The trees planted around the estate in mitigation are pitiful scraps that are vandalised. We no longer see a variety of birds. Our outlook now is mainly bricks and rooftops not fruit trees and wide skies. We dread losing the open aspect of the village and the surrounding countryside completely. We would hope that our grandchildren could enjoy the countryside as we have done.

If we wanted to live in a town we would not have moved here over 25 years ago

The green fields, the lungs of the Peninsula, are easy and cheap targets for the builders. Leave them alone, let the wild life thrive, build on brown field sites wherever possible.

*Don't allow greed to destroy our environment and our quality of life.
Don't Rape our village !*

We have looked at the Scenarios in the brochure and think the Fourth one is the least damaging to the area around our village.



Noreen and John Chambers

Motorcycle Action Group (MAG) . North Kent Branch.
C/o Steve Mallett, [REDACTED]

Submission for the Medway Local Plan.

MAG is a national riders rights and road safety organisation and we have an active branch in North Kent based in Rochester.

We have developed close ties with several local politicians including Vince Maple and Teresa Murray.

We see motorcycles and scooters (PTW's ,Powered two wheelers) as a solution to and not a cause of, local traffic problems.

We have a small congestion and pollution footprint and take approximately one third of the space a car needs to park.

Low powered PTW's provide an economical means for young persons to get to jobs that might otherwise be inaccessible to them .

We feel that the use of PTW's should be encouraged and one way of doing that would be to improve and expand parking facilities for PTW's so that riders could safely leave their machines while in town.

PTW parking needs to be :-

In clear view, not in a dark and badly lit corner where bike thieves ply their trade.

Well signposted.

Strong ground anchors or bars provided so that the machine can be secured by lock and chain.

Free at point of use. Please note, there is nowhere you can attach a 'parking paid' ticket to a PTW without some one taking it.

In the adjoining area of Gravesham there is a very good scheme for PTW's.

Any designated car parking space is free to a PTW. Bikers respect this privilege and you often see 2 or 3 PTW's occupying one car space.

S J Mallett, 23/5/17

Parham (Medway) Ltd

173 Pier Road, Gillingham, Kent. ME7 1UB

tel.: 01634 280088 fax.:01634 280164 email: office@parham.org.uk

Your Ref.

Our Ref.

LFP/PSH/14

6th February 2017

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

RE: Medway Local Plan: Development Options Consultation Document –
Land at Rede Court, Strood, owned by Parham (Medway) Ltd

Dear Sirs,

This is a response to your current consultation, promoting the above land for inclusion in the Local plan as a contribution to meet the shortfall in its housing land requirements.

We note the current situation, that research for the Plan shows that some 29,500 new homes will be needed over the Plan period to meet the population growth expected, and that a key purpose of the Consultation is to establish the 'most sustainable' choices from the options available to accommodate this scale of growth, including ability to deliver on the ground.

The Document states that considerable additional land to that already identified will need to be specified, and that 'greenfield' sites in suburban and rural areas will need to be considered. We submit that our land would make a valuable contribution to the current shortfall, if the land was removed from the Green Belt. Details about the land were given in our response to the 'Call for Sites' in spring 2014.

In substantiating our case, we focus on Section 3 of your Consultation Document. Paragraph 3.11 refers to the Green Belt. Part of the easternmost extent of what is the London Green Belt is that covering the area to the west of the present urban extent of Strood, the clear purpose of which is to prevent the coalescence of the urban areas of Strood and Gravesend. Our submission is that our land is not needed for this purpose to be maintained. We return to this below.

The Document states that given the scale of development needed, the Council has to look widely at the broad range of locations (paragraph 3.18) and set out a range of scenarios. These are presented for consultation and assessment as to which approach could deliver the most sustainable development pattern. Information is

requested on the contribution additional sites could make. We do this, focusing in Scenario 2, Suburban Expansion.

We note your initial focus is scenario 1; maximizing the potential for urban regeneration, i.e. land at and around town centres and waterfront areas - 'brownfield land'. However, as paragraph 3.25 states, there will still be a need to consider suburban areas as potential locations for development, and (3.26) there is a risk that some previously-developed land could not be redeveloped within the Plan period.

So Scenario 2 sets out the potential of suburban areas to meet the shortfall. Consideration will therefore be given to the inclusion of 'sustainable urban extensions' around Rainham, Capstone and Strood (paragraphs 3.29). The map at Appendix 1C includes our Rede Court land for consideration in this regard.

Scenario 2 considers, at paragraph 3.30, the potential of Green Belt sites to the west of Strood, to determine if such a policy change is required, and if exceptional circumstances exist that would require the Green Belt boundary to be reviewed. This consideration would assess the function of the Green Belt designation in this area.

We welcome this acknowledgement that the land at Rede Court is a candidate for inclusion in the Plan. The 'exceptional circumstances' which arise are twofold.

1. The critical issue is whether this site is necessary for the function or purposes of the Green Belt as set out in paragraph 80 of the Government's National Planning Policy Framework. We interpret this here as maintaining the expanse of open country between the build-up areas of Strood and Gravesend and more locally with the village of Higham. We submit that our land is not needed for this purpose. The particular topography of the site, and the existence of a partial tree belt at its outer boundary which can be added to as a condition of its release, supports the case. Moreover, the circumstances of the land's location are such that removing it from the Green Belt need not form a precedent for other releases in this area.
2. The land has the advantages of having physical drainage and other services available to it, as its development would be an extension to the existing housing area it adjoins, including road access points. This means it would contribute to the need for the Local Plan to demonstrate a five-year supply of readily available development land. The land is about 15.8 hectares in extent, with capacity for some 400 dwellings and ancillary facilities.

This advantage appears important in relation to your Scenario 3, developments on the Hoo Peninsula, where the Consultation Document states that significant new services and infrastructure would need to be provided, such that development on any scale would be for the longer term. Specifically regarding the controversial

Lodge Hill scheme, paragraph 3.38 states that (if it is to go ahead following the Public Inquiry) it would be a 'post 2025' development. So in a situation where Scenario 3 is essentially for the longer term, the case for the Rede Court Land is significantly enhanced. In this context its immediate deliverability, we therefore submit, is a clear exceptional circumstance.

In the light of the above, Parham (Medway) Ltd ask that its land be released from the Green Belt and included in the housing land allocations for the Medway Local plan, as a necessary contribution to the shortfall as set out in this Consultation.



Director
Parham (Medway) Ltd

In order to facilitate the incremental expansion of the settlement, suitable housing sites will need to be identified and bought forward for development. One such site is land adjoining No. 35 Cooling Road High Halstow. This is considered suitable for residential use, comprising approximately five to eight dwellings, with associated vehicular access, parking and landscaping. The site is in single ownership and readily available for development. Details of the site are set out below.

The site, adjoins the High Halstow settlement boundary, as defined by the Medway Local Plan Proposals Map, 2003 and is considered suitable for residential development, and inclusion within the amended settlement boundary.

Site Description

The site is located at the western end of the settlement and adjoins existing built development on two sides. The site currently comprises paddock land and is used for equestrian purposes, planning permission having been granted for change of use from agricultural land in around 2003. A single storey building with pitched roof is located at the south west corner of the site.

The site is of an irregular shape and extends to an area of approximately 0.40 hectares. It rises gently from west to east. The northern boundary of the site fronting Cooling Road comprises hedgerow, whilst the east and west boundaries adjoin existing two storey residential development. The rear (south) boundary is fenced and adjoins agricultural land. The existing vehicular access is from Cooling Road. The site is shown outlined red on the attached plan

Planning Considerations

The site adjoins existing development on two sides and provides for a suitable extension of the existing settlement boundary, through the infilling of a small gap between existing dwellings, whilst retaining the rear boundary line between the two groups of adjoining properties.

The site has an existing vehicular access to Cooling Road associated with its equestrian use. It is considered that the site has sufficient road frontage to allow for an enhanced access suitable for the proposed residential development.

Cooling Road is one of the principal routes through the settlement and it is considered that the local highway network is suitable to accommodate the level of traffic generated by the proposed development.

Since the site is actively used for equestrian purposes, it is considered unlikely to be of any ecological interest. An ecological study is proposed and it is anticipated that any issues that are identified, would be capable of appropriate mitigation. Similarly, whilst it is noted that the site is located within the zone of influence of designated habits, it is considered that given the scale of development proposed, any such impacts that may be identified are capable of appropriate mitigation.

It is noted that following submissions made in respect of the 2014 'Call for Sites' the Council have sought to classify the site as comprising the 'best and most versatile' agricultural land (Grades 1 and 2). It should be noted, however, that the proposal site has a heavy clay soil type, which would downgrade its designation from 'best and most versatile'. Within the High Halstow area, soil types vary from Thanet Sand and Silica Sand through to Blue Clay, often over a very short distance. This is illustrated by the Agricultural Classifications Map included within the Development Options Consultation Report, which shows the site on the border between Grade 1 and 3 farmland.

In addition, the current authorised use of the land is for equestrian purposes, planning permission having been granted for change of use from agricultural in around 2003. The site is not registered as agricultural land with DEFRA and does not attract an annual area subsidy payment. These factors combined with the relatively small size and shape of the site, make it extremely unlikely that it would be used or viable for agricultural production.

The site adjoins existing built development on two sides. In views from the west, the proposed housing would be seen in the context of the existing development that extends along Cooling Road on rising ground towards the central area of the village. Similarly, in views from the east, it would be seen in the context of the existing development fronting Wybournes Lane. In longer distance views from the south east (Dux Court Road), the proposed housing development would be seen as a continuation of the existing development fronting Cooling Road and Wybournes Lane, with associated boundary planting adjoining the farmland to the south. In summary, it is submitted that the

development of the site for residential purposes is unlikely to have an adverse impact on its landscape setting.

Whilst the site adjoins existing residential development on two sides, given the juxtaposition of the existing properties and the length of their rear gardens, it is considered that the development of the site will not have an adverse impact on the amenity of adjoining properties. In addition, the existence of adjoining dwellings is unlikely to restrict the potential capacity of the site any more than would normally be expected of such an infill site.

The proposed use of the site for residential purposes is not considered to have an adverse impact on any designated or non-designated heritage assets and is at low risk from flooding.

The site adjoins the west edge of the settlement boundary and is within easy walking and cycling distance of the village centre and its associated facilities. These include as follows:

Local Facilities

High Halstow primary school approx. 578 m

Hoo school 2.5 kms

Hoo Academy 2.5 km

Cliffe Woods School 3.7 km

Church approx. 329 m

Doctors Surgery

Dr Mara HK & Partners

The Recreation Hall

High Halstow approx. 578 m

Village Shop

Recently refurbished village stores supplies all daily requirements, together with a Post Office in Christmas Lane, approx. 741 m

Pubs

The Red Dog (The Street, High Halstow, approximately 390m) and The Horseshoe and Castle (Cooling 20min walk)

Clubs available within the village

Bell ringers

Badminton

Stichers

KLUX Martial Arts

Gardening Club

Whist Club

Community Choir

Dramarama

WI

Regular quiz nights

Youth Club

Hikers

Get fit classes

Cricket Club

Football team

Other facilities

A café is available weekly in the village hall

Public Transport

The Village is well served by regular bus services No: 191 and 796 to the Medway Towns. There are at least seven bus stops within the village, principally in Christmas Lane and 'The Street'. The nearest bus stop to the proposed site is in Christmas Lane, approximately 485m. In addition, several coach companies run commuter coaches to London (Monday to Friday).

It is submitted that the site occupies a sustainable location and is within walking distance of a good range of facilities and public transport links (max distance approximately 0.75

km) which is well within the generally accepted benchmark of 2 km originally identified in PGG13 - Transport.

Conclusion

It is considered that the site is well located in relation to the existing settlement and there are no overriding objections to its development for residential use. The site is in single ownership and readily available for development. The site is therefore considered to provide an opportunity to create a sustainable residential development in accordance with the provisions of the National Planning Policy Framework.

Penshurst Planning Ltd
April 2017



bull, andrew

From: [REDACTED]
Sent: 11 April 2017 10:34
To: futuremedway
Subject: Development of Cliffe and Cliffe woods

Follow Up Flag: Follow up
Flag Status: Completed

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

Penny Pellatt 11/04/2017

Ron Pellatt

Race Mechanic





From: [REDACTED]
Sent: 03 March 2017 10:53
To: futuremedway

Follow Up Flag: Follow up
Flag Status: Completed

Future development

Sent from [Mail](#) for Windows 10

Dear Sir/Madam,

I would like to respond to your published plans for the future of the Medway Town and in particular Hoo St Werburgh. I have known Hoo St Werburgh for 30 years and lived there for 16 years. I moved there because the delights of living in a village appealed to me.

Over the years, on my journey from Strood to Hoo, I have witnessed you allowing house building on more and more green fields. In Hoo itself you have allowed development of "single building" sites, into "multiple buildings" sites. This has meant the number of people living or using Hoo has increased dramatically.

All this without any increase in the facilities of the village.

I note your latest published plans give us Hobsons Choice! All 4 plans include continued development of Hoo St Werburgh.

I wish to voice particular opposition to Plan 3. Plan 3 is to remove the word "village" from Hoo altogether and make it a town!

Hoo, along with lots of other villages in Kent, is based around a crossroad. A crossroad made up of 4 very small roads. 4 small roads hampered by traffic islands, speed humps and a zebra crossing that you have put in. All 4 roads are used by double decker buses and large LGV vehicles on a regular basis. Off road parking to use the shops and services in the centre of Hoo is already at a premium to the increase in local development. The roads around the centre of the village are covered by double yellow lines that you fail to police, apart from once a year, so they are completely ignored making it a trial just trying to move through the village.

Short of demolishing the shops and houses around the village centre, a bit self-defeating, there is no way to improve the traffic flow. The roads are too narrow!

I urge you in the strongest terms possible to ditch plan 3. There is little point in opposing the other 3 because you will impose one of them any way!

Yours Sincerely,

Peter Collard

bull, andrew

From: [REDACTED]
Sent: 29 May 2017 18:02
To: futuremedway
Cc: peter collins
Subject: Medway Local Plan 2017 - Housing

Follow Up Flag: Follow up
Flag Status: Completed

Dear Medway Council,

Regarding the 25th May's piece in the Medway Messenger "We must prevent Medway turning grey", I write to express my concern over the intention of destruction of green spaces to build the 49,000 + houses (of various sorts) to accommodate the growing population in years to come. I have lived in Chatham for nearly 30 years and recognise the Medway conurbation as densely packed with houses and so on already and that to build such numbers of new houses on currently un-built on land is an extreme measure. We need our remaining green open spaces for the health of us all. Building such numbers of new dwellings – with the associated roads required – is going to put a tremendous strain on the Towns' current infrastructure. There will be more traffic, a need for more parking spaces, more schools, more GP practices, more employment and so on, and the Towns will be increasingly over-burdened by such new developments. I urge the Council to retain our remaining green spaces and devise different ways of tackling the current and future housing problem.

Yours faithfully,

Dr. Peter Collins,

[REDACTED]



Cleaveland, Chart Road, Chart Sutton, Kent ME17 3RB

Tel: 01622 844330

info@petercourtassociates.co.uk

www.petercourtassociates.co.uk

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

23rd February 2017.

My reference: PCA/2011/2.

Dear Sir,

Representations on Regulation 18 Development Options consultation

These representations are submitted on behalf of my clients, Messrs David and Neil Taylor, who own and operate Port Medway Marina at Cuxton. I submitted a response to your Issues and Options Consultation Document in February 2016, in which I explained the nature and location of my clients' business and provided replies to many of the questions posed in that document. I am pleased to see that you have now produced a more focussed document in which you set out various development scenarios along with what are effectively draft policies. I have discussed the implications of these with my clients who have instructed me to submit the following representations.

Before making any general or detailed comments, it is appropriate to explain the nature of my clients business and their intentions, since this provides the context of the representations.

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

A plan of the site is attached.

The owners of Port Medway Marina have worked with the Council over a considerable period of time and look forward to continuing to do that in the future. They appreciate that development proposals need to be made within the context of policies as set out in the local plan and, in these



supply of land for housing. Its approach of focussing on brownfield land is acknowledged and welcomed by my clients, given the fact that their landholding comprises previously developed land.

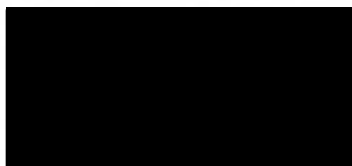
The Council has identified four strategies in this respect and provided plans in the Appendix to illustrate the locations as to where this will take place. Indeed, there is a degree of overlap on those plans, which is not surprising given that the strategies are not mutually exclusive. These four strategies have been considered by my clients, who welcome the fact that their site is shown to not be subject to any policy constraint or comprise green infrastructure. Furthermore, Cuxton itself is identified for incremental expansion in three of the four strategies, while in the fourth ("Rural Focus", Appendix 1D) it is identified as an expanded village.

These strategies are welcome, given the fact that Port Medway Marina is not just part of Cuxton but is both adjacent to the railway station and can provide links to Medway park to the north. At this stage, my clients do not endorse any particular strategy, given that they all acknowledge further development at Cuxton. Moreover, it is likely that the Council may decide to adopt elements of one or more of the strategies, rather than specifically exclude any of them.

In these circumstances, the Council needs to acknowledge the importance of existing marinas, together with their potential to deliver additional benefits in terms of economic and residential development to the Authority.

If the Council requires any further detail in respect of the points made above, then my clients will be pleased to provide such further information as necessary.

Yours faithfully,



Peter Court
Director

enc

cc. Messrs D avid and Neil Taylor, Port Medway Marina
cc. Mr. T. La Dell, La Dell Wood consultants

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

2nd March, 2017

My reference: PCA/2017-04

Dear Sir,

Representations on Regulation 18 Development Options Consultation

These representations are submitted on behalf of my clients, Wealden Homes Ltd, who control land at Bridge Lodge, Four Ems Hill, Chatham. Representations regarding this site have previously been submitted in the context of your Strategic Housing Land Availability Assessment in 2015, when they were given the reference 0718. Although at that time you did not endorse the proposal for residential development there, the fact of the matter is that time has moved on. You have continued the research into your requirements and opportunities and now identified various scenarios for achieving that. In particular, you have set out your housing requirement for the plan period, and acknowledged the fact that a substantial amount of land is needed. Furthermore, it is clear that this cannot be achieved from brownfield land alone. Moreover, it is also obvious that you do not have a five year supply of land for housing. In these circumstances, I have discussed the implications of this with my clients, who have instructed me to submit the following representations.

The land in question comprises undeveloped land on the northern side of Four Ems Hill, adjacent to the interchange. It is a sloping field that has an area of approximately 2.5 ha. A plan of the site is attached.

The site is being promoted for self-build residential plots, as promoted by national planning policy in the NPPF. The yield from this site is approximately 20-25 dwellings. In these circumstances it is requested that provision for affordable housing is inappropriate. Furthermore, it should be noted that a World War II pill box on the site would become part of the development and made available for public viewing as a local heritage asset.

It is, moreover, contended that the site lies in a most sustainable location. Setting aside the fact that it is adjacent to the proposed major development at Lodge Hill, Chattenden itself has two shops, a primary school, community centre, church, and a petrol station. Moreover, it is on a bus route. In these circumstances, it is a most appropriate location for further development.

Your draft local plan sets out the distinctly precise requirement of 29,463 homes to be provided over the plan period 2012-2035. That figure was identified from the work carried out for the North Kent Strategic Housing and Economic Needs assessment in 2015. The Council may therefore wish to consider whether any increase is needed, especially in light of the provisions being promoted by adjoining local authorities and the forecast outflow of migration from London.

In looking to meet this requirement, the Council has calculated that it can provide a total of 18,206 dwellings from completions, extant permissions, allocations, SHLAA pipeline sites and from an element of windfall.

This itself is probably an over-estimate, since it appears to be based on the assumption that all sites with planning permission, along with the outstanding allocations, will be developed. Other local authorities and, indeed, Planning Inspectors, generally make allowances for non-implementation. The Council should therefore adopt a similar approach and discount these sources by between 5% and 10%.

Notwithstanding this, the Council has acknowledged that it is unlikely that the full range of development needs could be met solely from brownfield land in its regeneration areas and that greenfield sites in suburban and rural areas may have to form part of its development strategy.

Such an acknowledgement is welcome, particularly in light of the Council's stances in previous draft core strategies and local plans.

In order to address this shortfall, the Council has identified four scenarios that could be adopted. These scenarios are not mutually exclusive, particularly as no assessment of their capacities has been provided. However, in identifying them, the Council has acknowledged that it has sought to avoid the considerable amount of land that is covered by important environmental and strategic designations such as RAMSAR, SPAs, SSSIs, the AONB, good quality agricultural land (Grade III) and the Green Belt.

It must be said that my clients fully endorse the Council's strategy of seeking to avoid allocating land within such designations. Their landholding at Four Elms is not subject to these constraints and therefore this is a most important consideration.

The Council's four scenarios, namely (i) maximising the potential of urban regeneration; (ii) suburban expansion; (iii) Hoo Peninsula focus and (iv) urban regeneration and a rural town are described in Section 3 of the consultation document and helpfully illustrated as Appendices 1B to 1E.

It can clearly be seen that there are substantial degrees of overlap between each of those. In particular, every scenario includes a substantial element of development at Lodge Hill along with a variable amount of development at Hoo. This shows that, whatever strategy is going to be adopted, then development will take place in this area.

Such a situation is fully supported by my clients, since their site is on the southern periphery of Lodge Hill, between the former barracks and the A228 dual carriageway. The site can easily be developed independently, since it is self-contained and does not rely on any of the land at Lodge Hill first coming forward. Indeed, it could act as a modest example of the sort of development that could take place on a much larger scale a short distance to the north and north east.

It is acknowledged that the Council assessed this site as part of its SHLAA process in 2015. However, that was at a time before it had identified its housing requirements and strategies for addressing those needs. Now that it has published the Regulation 18 consultation document, especially with its focus very much on Lodge Hill and the A228, it is appropriate to re-consider the Council's previous assessment.

As is becoming increasingly common the Council used the traffic light approach of red (the worst), amber and green when considering a variety of impacts. Although this is somewhat subjective, it does provide a simple and easy to comprehend assessment, from which anyone can quickly see what the Council thinks of any particular site.

The assessment considered impacts under five separate headings, namely (i) Suitability-General; Suitability - Housing; (ii) Suitability - Economic Development; (iv) Suitability - Mixed Use and (v) Availability. In respect of my client's site (no. 0718, Bridge Lodge, Four Elms Hill) the results were as follows.

In the 13 elements of Suitability -General, 10 were either amber or green. The only "red" elements were (i) facilities and services accessibility, (ii) public transport accessibility and landscape.

For the category Suitability - Housing, all four elements were green or amber - and yet the overall conclusion showed that the site had been classified as red. Not only was this in itself surprising, but the reason given was that "the site is not considered suitable for residential development unless the identified constraints can be addressed"

Apart from the inconsistency of this conclusion, the reason given could be applied to every other site. The fact of the matter is that no site is constraint-free and therefore the Council would expect any impact to be minimised as best as reasonably possible. Therefore, for the Council to give this site a "red" grading is simply unrealistic.

In respect of the Suitability-Economic Development category, this too had an overall grading of red, despite the fact that the site was not being promoted for economic development and only one of the three individual elements was graded red.

The fourth category, namely Suitability -Mixed Use was also categorised as red, for the sole reason that, due to its location, it was not suitable for mixed use development. Again, this stance of the Council is meaningless as the site was not being promoted for mixed use.

Finally, the Availability of the site was graded green, as the landowner was actively promoting its development.

This final category is most important, especially given the fact that the Council does not have a five year supply of housing land.

It is therefore clear from the above that the Council graded the site as red on the grounds that it was unsuitable for economic or mixed use development. My clients are not concerned about this, since the site is not being promoted for those uses. Furthermore, the point has also been made that the Council's grading of the site as red for housing is completely inconsistent with their assessment of it. Indeed, such a grading would fall away if the developers were to address the constraints -which they most certainly would do. Otherwise, as shown by the assessment of all of the other elements, the site can reasonably be developed with little impact.

In these circumstances, it is requested that the Council gives serious re-consideration to the impact of just residential development here. Indeed, it would be wrong to simply rely on an unrealistic assessment made back in 2015.

The fact of the matter is that the Council needs to allocate land for and /or permit residential development proposals as a matter of urgency. It is clear from the information provided in its latest Annual Monitoring Report that it does not have a five year supply of housing land and is therefore open to planning by appeal. It should therefore consider allocating this site as a matter of priority. It is one that can be delivered quickly and will act as a showpiece for the subsequent developments at Lodge Hill and Hoo. Its development would accord with the

strategies as set out in all scenarios and, in particular, that in Scenario 3: the Hoo Peninsula focus. Indeed, the Council acknowledges in paragraph 3.33 of its draft document that that would involve development in neighbourhoods around the wider area, including Chatterden, Deangate and Lodge Hill.

It is therefore submitted that my clients site at Four Elms Hill be allocated for immediate development.

If any further information is required, then please do not hesitate to contact me.

Yours faithfully,



Peter Court.
Director

enc

cc. Mr. Graham Norton, Wealden Homes Ltd.



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Representations to Medway Local Plan Development Options Consultation (Regulation 18)

Client: Begur Ltd

Date: April 2017

1. Introduction

These representations to the Regulation 18 stage Local Plan consultation have been prepared on behalf of Begur Ltd. The company has interests in land to the north of Rainham/south of Lower Rainham Road, within the area of land shown indicatively as a potential growth location in Appendix 1C to the Consultation document. These representations respond to key topics raised within the Consultation document. Appendix 1 contains a summary of the proposals being promoted by Begur Ltd for a sustainable urban extension to the north of Lower Rainham Road.

2. Housing Need and Supply

Section 3 of the Consultation document begins by setting out the quantum of growth envisaged within the Plan period, which is stated to be informed by the background evidence base, in particular the North Kent Strategic Housing and Economic Needs Assessment (NKHENA).

The discussion of the relevant Housing Market Area (HMA) within the NKHENA emphasises the relationship that Medway has with London, noting that 33% of migration in to Medway comes from London Boroughs such as Bexley, Lewisham, Greenwich and Bromley. Whilst individually each London Borough contributes less in terms of inward migration than adjoining districts such as Maidstone, Swale and Gravesham, the NKHENA emphasises London's influence on the Borough, and the likely correlation between lower house prices in Medway to the capital.

The impact of migration is relevant to the consideration of the objectively assessed housing need (OAN). The new White Paper makes clear that Local Planning Authorities are expected to work together to demonstrate how unmet housing need in one area is to be addressed in neighbouring areas. A key issue for all south-east authorities is the acknowledged inability of London to meet its own OAN within its own area, and therefore its reliance on neighbouring areas to meet that need. Medway is clearly a location with a strong draw for the London housing market (described in the NKHENA as the "one way nature of London's influence" as out-migration to London from Medway is much weaker). However, notwithstanding this acknowledged relationship, it is not evident that the NKHENA has made an allowance for unmet need from London when considering the OAN for Medway.

We are not suggesting that London should form part of the same HMA, but its influence on the local housing market, and the strategic implications of the need to meet unmet housing need from within

London, have not been properly factored in to the consideration of the most appropriate OAN for Medway.

We also note that the analysis in the NKHENA includes a consideration of the OAN for the wider HMA, but it is not clear that under the Duty to Co-operate, full consideration has been given to the potential for all component authorities to meet their own OAN, or whether Medway has a role to play in meeting locally generated OAN for the wider HMA.

The NKHENA ultimately recommends a figure of 1,281 dwellings per annum, taking in to account employment trends. This would indicate a total requirement figure of 32,025 homes over the 25 year period 2012-2037, or the 29,463 units referred to in the draft Local Plan over the shorter 23 year period to 2035.

However, the NKHENA also identifies that the number of affordable homes required over the same period is 744 dwellings per annum. If the Local Plan is to meet the NPPF objective of meeting all housing needs of the community, affordable housing would need to be delivered at a rate of 58%, which is plainly undeliverable in viability terms. Given that the Local Plan is only proposing to seek 25% affordable housing on sites of 15 units or more, for reasons of viability, the Plan is going to be delivering significantly lower than 50% of affordable housing requirements. In this context, the figure of 29,463 is not meeting the full OAN, because it is only addressing part of the locally arising housing need. The obvious solutions are firstly to increase the housing requirement figure in order to enable more of the affordable housing needs to be met, and to seek through the Local Plan to test the potential for higher rates of affordable housing delivery on larger sites where affordable housing provision may be more viable.

At the moment, the draft Local Plan is not demonstrating what it is doing to maximise affordable housing delivery, and it is likely, given the significant size of the shortfall, that a Local Plan Inspector will wish to see evidence as to why options for increased affordable housing delivery have not been explored.

In terms of the supply side, the table that follows paragraph 3.7 provides a summary of existing expected sources of supply, but it would be helpful to make clear that the 8,813 units identified as SLAA pipeline sites includes 5,000 units at the currently stalled Lodge Hill/Chattenden site. It should also be made clear that the 18,206 figure quoted as the residual after existing identified sources of supply are taken in to account is a guide only, since the Local Plan will still need to assess and allocate SLAA sites according to their suitability and likelihood of delivery in the Plan period, in addition to the need to test other sources of supply (including existing allocations, permissions and windfalls) for genuine deliverability.

3. Paragraphs 3.9 to 3.20 (the prelude to the strategic development scenarios)

Paragraph 3.9 commences by noting that the Council considers it “unlikely that the full range of development needs could be met solely in the identified regeneration areas on brownfield land”. Given the quantum of both homes and jobs to be provided, this is something of an understatement. However, nowhere in either the preface to the different scenarios or in the text relating to the scenarios themselves is any indication given as to the scale of growth that the Council considers can be met through regeneration of brownfield land, and the scale of growth that will need to be accommodated outside the existing urban areas.

This criticism is true for all of the different components of housing delivery across the four different options. In each case, the distribution of development between regeneration, suburban extension, rural expansion and other sources of supply are not provided. It is difficult therefore to compare on a meaningful basis the four different scenarios, because there is no information given alongside each

scenario as to what assumptions are being made about the number of homes being delivered, and the sources of supply.

Is it in fact the case that all four options are allowing for the same total number of homes and jobs?

Although the graphics set out in the Appendices are helpful to an extent (subject to the specific concerns we raise elsewhere in these representations), the use of generic symbols to represent scales of growth in different locations does not necessarily give a true representation of the impact of development in each location, and the mixing of generic symbols in some cases and the identification of site specific areas in others adds to the lack of clarity as to the implications of the different options. The combination of a lack of clarity/consistency in the graphic representations of the options with a lack of data in the written descriptions means that the implications of the different options cannot readily be assessed.

The second part of paragraph 3.9 states that the Council's approach is to utilise land that is free of environmental constraints, or lesser landscape value, and of lesser agricultural value. With regard to the first of these, the Consultation document helpfully includes at Appendix 1A a plan showing the relevant Environmental Designations. Paragraph 3.11 refers to these designations, and states that these are locations where development "should be restricted". However, Lodge Hill is a Site of Special Scientific Interest, and yet is included in every scenario as a potential development site. Obviously we recognise that this site has been the subject of a long and protracted process to assess the extent to which development may be compatible with the ecological interests, but the implication from the text is that the environmental designations shown at Appendix 1A are such as to preclude development, but the continued promotion of Lodge Hill does not sit squarely with that implication.

In respect of landscape value, the Consultation document itself contains no information other than the identification of AONBs on the Environmental Designations plan. If this is indeed the extent of the consideration of landscape issues at this stage, then that should be made clear. The adopted Local Plan identified areas of Local Landscape Importance, but these pre-date the NPPF and the 2011 Landscape Character Assessment work, and of course were adopted at a time when the scale of development to be accommodated in the Borough was significantly less. It does not appear as if these previous landscape designations have been relied upon, and we agree with that approach, but it is unclear as to what assessment process in the alternative has been relied upon under the methodology suggested by the wording in paragraph 3.9 regarding "lesser value" landscape areas.

In respect of the reference to areas of lesser agricultural value, it is again unclear what methodology has been assumed, since no information on agricultural land quality is given in the Consultation document. However, the Magic website indicates that much of the undeveloped parts of the district are of relatively high agricultural value, and this is supported by the text at paragraph 3.12. As paragraph 3.13 also notes, the only significant areas of lower quality agricultural land tend to coincide with areas of land of higher landscape and ecological value. The reality is therefore that agricultural land quality is unlikely to be a significant factor in the assessment of development site suitability, and the assessment process should make this clear.

In respect of flood risk (para 3.14), it would again be helpful if the information supplied could illustrate which areas have been excluded on grounds of flood risk.

With regard to paragraph 3.19, we note that it is stated that the regeneration of Medway's waterfront and town centre regeneration is central to all scenarios, but the graphics for the different scenarios in the Appendices do not show a consistent approach to these matters.

Also with regard to paragraph 3.19, we note the reference to making best use of previously developed land, and would not disagree with this, but there is a question as to whether this means making best use of that land for housing or other essential uses. It is typically the case that development costs for previously developed land are higher than for greenfield sites, and given the significant shortfall in affordable housing provision and the need for the Plan to deliver employment growth as well, there is equally an argument for safeguarding those previously developed sites that are likely to have lowest ability to deliver affordable housing for employment related purposes, and considering residential sites with particular reference to relative viability, to maximise affordable housing delivery as well as making best use of previously developed land for other beneficial land uses.

4. Comments on Scenario 1

Paragraphs 3.21 and 3.22 suggest that the key element of the “maximising” urban regeneration option is delivering higher development densities to the town centres and urban waterfront sites, but the Consultation document does not give any indication of what “higher densities” means in terms of capacity, or any indication of what existing/proposed densities are.

In addition, and perhaps more importantly, the text does not state how higher densities are to be achieved e.g. is this through permitting taller buildings, or reducing car parking or amenity standards, or some other form of change to existing policies that would encourage higher densities?

Whilst the principle of higher densities in sustainable urban location may be acceptable, the Consultation document does not therefore provide any information that allows a reader to assess what achieving higher densities actually entails, or whether the forms of development involved are viable.

Paragraph 3.25 suggests that achieving higher densities would in effect mean flatted development. There is no indication from the Strategic Housing Market Assessment that large numbers of 1 and 2 bedroom apartments are needed in the area (quite the opposite), whilst the lack of demand and previous over-supply of such units generally in the South-East and Kent Thameside has left no market appetite for high density flatted developments. We do not therefore consider that a strategy predicated on high density apartment provision is deliverable in practice, irrespective of the lack of synergy with the SHMA.

With regard to the proposals for encouraging mixed-use regeneration of the Medway City Estate, this does not appear to be a realistic proposition without either or both compulsory purchase of existing business land, and public sector financing. The site does not appear to have been previously promoted for development through ‘call for sites’ exercises and is shown in the 2017 SLAA report as being excluded due to lack of availability. Large parts of the site fall within Flood Zones 2 and 3, which do not accord with the stated objective of locating development in areas of lower flood risk at paragraph 3.14. In the absence of publically owned land to which existing businesses could be relocated, it is difficult to see how the redevelopment could occur without significant adverse impacts on existing local employment, which would run counter to the Plan’s objectives for employment generation. Medway is not a prime location for high density employment uses such as offices, and therefore a strategy based on substantially reducing employment floorspace in the hope of attracting higher density/high value alternatives is unlikely to be achievable. For all these reasons, we do not see that wholesale redevelopment of the Medway City Estate is a deliverable proposition.

We note that this option also refers to relocation of Gillingham Football Club to a new stadium. This is a site specific proposal that could occur under any scenario, and is not linked to this particular scenario only. In reality, whether or not this proposal goes ahead will depend on the economics and practicalities of securing an alternative stadium site.

Paragraph 3.26 of the Consultation document succinctly summarises all of the reasons why scenario 1 is both inappropriate and unlikely to be achievable, and for the reasons set out above, and set out in Paragraph 3.26, as an overarching strategy, we **disagree with scenario 1**, which should be discounted.

5. Comments on Scenario 2

Firstly, we agree with the comment at Paragraph 3.27, i.e. that the ‘suburban expansion’ scenario still includes for urban regeneration as part of a balanced approach. It is not a question of ‘either/or’, but taking a realistic approach to what can be delivered through urban regeneration and higher densities, and coupling that with a portfolio of suburban development opportunities to deliver the quantum and mix of housing (including affordable housing) that the district requires.

We also agree with the statement at Paragraph 3.28, to the effect that new suburbs of a sufficient scale can help to deliver the social and physical infrastructure necessary to support the additional populations proposed, through mixed-use development that delivers the requisite on-site and off-site infrastructure. We would particularly commend the promotion of ‘garden’ suburbs, where the integration of existing and new greenspace forms an integral part of the design.

With regard to paragraph 3.29, we note that reference is made to initial highway testing, and possible constraints to highway capacity. The Evidence base does not appear to include any recent highways testing, and if there is therefore existing highway modelling that the Council is using to test development options, it is important that it is made available, so that site promoters are able to respond to any issues raised.

We note that this option includes at paragraph 3.30 the suggestion that it would include consideration of development in the Green Belt west of Strood. The Council will be aware that Green Belt policy sets out a specific test of “exceptional circumstances” before any alteration to Green Belt boundaries should be made. The high court case of *Calverton Parish Council vs Nottingham City Council and others* (2015 EWHC 1078) provides a helpful guide to the steps to be taken during Local Plan preparation and the application of the “exceptional circumstances” test. Given the existence of suitable development options outside the Green Belt in Medway, it seems extremely unlikely that “exceptional circumstances” could be shown to exist in the context of this Local Plan and relevant case law. This element of scenario 2 should be removed.

With regard to Paragraph 3.31, whilst we do not disagree that some development on the Hoo peninsular may well be complementary as part of the ‘suburban expansion’ option, it is unclear (as per our previous comments) how “important landscape features” are impacting on the Council’s assessment process at the current time. Furthermore (and again as previously indicated), the lack of data on the number of new homes that each scenario is assumed to provide means that the significance of the concern raised at Paragraph 3.31, regarding the extent to which suburban growth could meet the overall housing requirement without the need to rely on delivery at Hoo, cannot be assessed.

It is notable however that, apart from the unsubstantiated concern raised regarding landscape impact, and the need for proper consideration to be given to any highway network improvements, the discussion under scenario 2 in the Consultation document raises no significant issues of deliverability or suitability of this option.

In further support of the ‘suburban expansion’ option, we would add:

- Large-scale greenfield ‘garden’ suburbs represent one of the most viable and deliverable options for large scale residential development, because where capacity exists, existing urban infrastructure helps to reduce the upfront costs of development and reduce lead-in times. This means that this form of development normally has a relatively higher capability to deliver much needed affordable housing and invest in infrastructure improvements;
- Suburban extensions to existing large urban areas provide one of the most effective ways of integrating new development with existing communities, since relatively speaking the scale of the extension is small compared with the size of the existing urban area (as opposed, for example, to large-scale village expansion at Hoo);
- As shown in the diagram at Appendix 1C, there are a number of suitable locations where strategic suburban extensions could occur around Medway’s existing urban areas, thereby improving the prospects for successful delivery by avoiding over-reliance on a single location;
- Large scale ‘garden’ suburbs offer the opportunities for both mixed uses (including appropriately scaled community uses), and for a mix of residential types. In particular, the large scale of suburban extensions offer opportunities for the inclusion of sites suitable for housing for the elderly, and for a mix of unit sizes to meet all areas of housing need, thereby best meeting the requirement under the NPPF for local plans to meet the full market and affordable needs of the local area, responding to the needs of different sectors of the community.

For the reasons set out above, we **support scenario 2** (subject to exclusion of Green Belt options).

On a specific matter relating to Appendix 1C, we note that for the most part, the potential suburban extension locations are drawn by reference to sites identified in the SLAA. The expansion of Hoo village is shown diagrammatically, which is perhaps understandable, as there are at least two different directions that expansion of Hoo St Werburgh could conceivably take. However, we do not understand why the potential suburban extension north of Rainham has been shown in a diagrammatic form, rather than using the same approach used for the other suburban locations. In addition, the diagram does not reflect the actual extent of SLAA sites in this location shown at Appendix 1A, and gives the impression of a form of development extending north of Lower Rainham Road, which has not been proposed. It would be helpful if in future consultations, a consistent approach were used to the graphics between the different suburban locations.

6. Comments on Scenario 3

Paragraphs 3.32 to 3.34 explain that under this scenario, the intention is to turn the village of Hoo into a sizeable town, but the absence of any figures to explain the scale of development again makes assessment difficult.

Leaving aside the impacts on the existing village, and the extent to which it would be possible to successfully integrate new and existing communities, there are key practical issues of delivery with this option. The Consultation draft rightly draws attention to infrastructure delivery, but if the new town of Hoo is to function as a higher order sustainable development, the scale of growth would need to be large enough to both support and deliver significant new infrastructure. So for example, sustaining a secondary school is typically considered to require in the order of 6,000+ homes, and the cost of provision of a new stand-alone facility is much higher than expanding existing capacity.



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In order therefore for development at Hoo to be capable of funding the necessary new social and physical infrastructure, it would need to be planned at a large scale. However, against this, the Hoo peninsular comprises a more limited housing market compared to the Gillingham-Chatham-Rochester conurbation, and there is a much lower demand for new housing on the peninsular. This brings in to question whether or not there is a sufficient housing market to deliver the scale of development that would be required within the Plan period, given the much longer lead-in time and delivery rates that would be involved. In particular, we would query whether there is sufficient demand in the market to sustain both Lodge Hill and the strategic expansion of Hoo.

In addition to the above, there is a limit to the extent to which Hoo would be able to operate as a sustainable new town. We have already commented on the relationship that the MKHENA has identified between Medway and London, but for travel to work purposes there are also strong inter-relationships between Medway and neighbouring Gravesham, Swale, Maidstone and Tonbridge and Malling. These inter-relationships depend upon access to the rail network and the strategic road network. Hoo is more peripheral to the strategic communications links, and therefore irrespective of the deliverability of a new town in the Plan period, any significant development will inevitably lead to pressures for travel southwards back to the main strategic east-west and north-south lines of communication.

For all of the above reasons, we **disagree with scenario 3**.

Paragraph 3.38 refers to the possibility of self-build and custom housebuilding, but this form of housing is not particular to Hoo, and could be delivered through any of the scenarios. It should not be a factor weighing in favour of scenario 3.

7. Comments on Scenario 4

Scenario 4 is described as being a combination of the urban intensification option, and the growth of a new town at Hoo. In that sense, it combines the least deliverable and viable elements of both scenarios 1 and 3, and for these reasons, we **disagree with scenario 4**.

8. Summary comments on Scenarios 1-4.

Ultimately, we agree with the sentiment expressed throughout the discussion of the options, which is that the final preferred strategy is likely to comprise a mixture of components from all four scenarios. Ultimately, however, it is essential that above all else the strategy is deliverable, because however well-planned a strategy is, the test is whether or not it can deliver the right type of development on the ground.

For the reasons discussed above, and for the reasons identified by the Council itself, an over-reliance on higher urban densities and a scale of development on the peninsular (i.e. scenarios 1, 3 and 4) will not be deliverable. It is essential therefore that, whilst elements of scenarios 1, 3 and 4 may well feature, sustainable suburban extensions as suggested by scenario 2 will need to form the principal element of the development strategy if the scale of development set out in the Plan is to be delivered.

9. Specific Comments on land north of Rainham/south Lower Rainham Road

We have previously made representations in support of the provision of a new 'garden suburb' to the north of Rainham, south of Lower Rainham Road. Appendix 1 to these submissions contains a summary of the benefits of this location.



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10. Specific Comments on the SLAA sites at Appendix 1A

We would like to take this opportunity to update the Council on one matter concerning the availability of SLAA sites shown on the Plan at Appendix 1A. We act for clients that have a long-term agricultural tenancy (to beyond 2030) on land previously identified as SLAA site 1063 (Miers Court Farm), to the east of Rainham.

Towards the end of 2016, we approached the relevant landowners' representative, who has confirmed in writing that the landowner has no intention of making this land available during the lifetime of the existing tenancy, which to all intents and purposes means that this site cannot be considered as being available during the Plan period.

We attach at Appendix 2 to these representations relevant correspondence confirming this position.



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Appendix 1 – Begur Ltd Summary Proposals

Introduction

Begur Ltd have an interest in SLAA site 1061, which lies to the south of Lower Rainham Road, adjoining the existing built up area of Rainham to the south.

SLAA site 1061 forms one of a number of SLAA sites being promoted by adjoining landowners in this location, which could be combined to create a comprehensive urban extension in this location, as shown approximately on the plan below. Begur Ltd are happy to work with adjoining landowners, as appropriate.

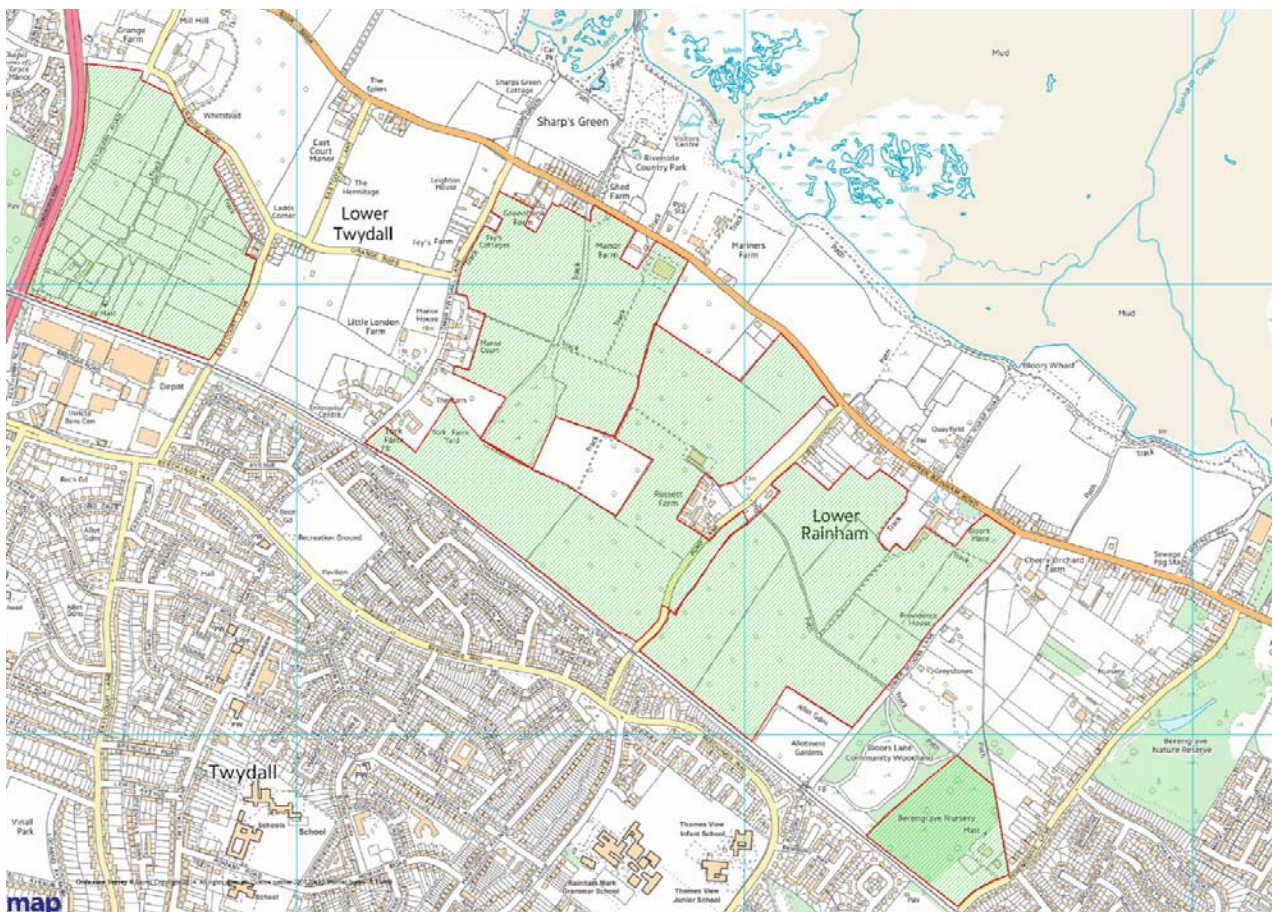


Figure 1: Approximate extent of principal SLAA sites promoted through Medway Local Plan.

Development Principles

Whether in isolation or as part of a wider strategic development, likely development principles for development in this location would include:

- Estuarine Landscape Buffer – development set back from Lower Rainham Road to maintain a landscape buffer between the new development and the estuarine landscape north of Lower Rainham Road (also helps to maintain the setting of the Riverside Country Park);
- Buffers to nearby Conservation Areas – The Lower Rainham and Lower Twydall Conservation Areas lie to the north-east and west of the area respectively. The proposals would potentially

include for the retention of existing agricultural activity in the vicinity of these settlements, to preserve the setting of these heritage assets.

- Improved Pedestrian/Cycle Access – The proposals would include measures to secure pedestrian and cycle access between the development and the existing adjoining urban area. There are existing connections both under and over the railway, but scope exists to enhance these linkages (e.g. for example through the use of priority working at existing vehicular crossings to provide additional road space for cyclists and pedestrians);
- Mixed-use – provision of supporting open space, community and social uses to provide local ‘neighbourhood’ facilities for day to day use by new and existing residents;
- Protection of rural lanes – internal spine roads to act as ‘by-passes’ to existing rural lanes such as Pump Lane, allowing reduced vehicular usage of such routes compared to existing, and potential downgrading of such links for vehicular use.

SLAA response

At the current time, the SLAA identifies site 1061 and others in this location as ‘unsuitable’, but the SLAA assessment has not to date taken in to account Begur’s proposals for the site, or been informed by the technical work that Begur has commissioned.

In brief, the matters raised in the SLAA, and a summary of Begur’s response, is set out in the table below.

Topic	Response
Facilities and Services Accessibility	The SLAA recognises that a strategic development in this location has the potential to deliver on-site facilities to address access to local services, and Begur Ltd’s proposals include for appropriate local facilities. In addition, the proposals include for improved accessibility to existing facilities.
Public Transport Accessibility	The SLAA concludes the site has good access to public transport, therefore not an issue of concern.
Highway Network Capacity	We understand that Medway have commissioned strategic highway modelling, but this has not been published. Further evidence on wider transportation impacts can be provided once the Council’s modelling has been made available.
Site Access	The SLAA concludes the site can be satisfactorily serviced, therefore not an issue of concern.
Ecological Potential	The SLAA notes the site has not been investigated – no significant site specific constraints have been identified (see Technical Evidence base below).
Designated Habitats	The site has been subject to assessment by Begur’s consultants, and suitable mitigation has been identified (see Technical Evidence base below).
Landscape	The SLAA identifies a constraint of damage to a locally valued landscape. The site has been the subject of assessment by Begur’s consultants, and this conclusion is disputed. The site is identified as having a ‘moderate’ capacity for change, and with a suitable set back from the estuarine environment and with appropriate landscape



Phase 2

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	mitigation, the site is appropriate for development without significant harm (see Technical Evidence base below).
Heritage	Begur's proposals take in to account existing Conservation Areas and are designed to ensure appropriate separation to respect the setting to exiting heritage assets.
Air Quality	The SLAA offers no evidence in respect of this matter, but the site is not subject to existing air quality issues.
Contamination	The site has been subject to assessment by Begur's consultants and no material issues of contamination arise (see Technical Evidence base below).
Site developability	The SLAA acknowledges no material issues arise in respect of this issue.
Agricultural land	The site does comprise high quality agricultural land, but all options for suburban development will impact on high quality agricultural land, so this cannot be a determining factor.
Open Space	The site does not comprise existing public open space, so this issue does not arise.
Flood Risk	The site does not fall within a flood risk area.
Noise	The site is capable of mitigation from external noise sources (see Technical Evidence base below).
Amenity/Overlooking	This is a site specific design matter, not a strategic consideration – ample opportunity exists to design the site in a manner that does not cause unacceptable overlooking or loss of amenity.
Employment land	The site is not designated employment land, so this issue does not arise.
Overall	The site is recorded in the SLAA as being unsuitable unless existing identified constraints can be addressed. However, on the basis of the above and the matters considered below under the heading Technical Evidence base, the only identified constraint that has yet to be resolved is the matter of the extent of mitigation required to address off-site highway impacts, and that work is awaiting the publication of the highway modelling work that Medway has commissioned.

Technical Evidence Base

A range of technical studies have been prepared to support the deliverability of development in this location, in the light of the SLAA. A summary of the technical evidence is set out below, and details can be provided to the Council separately.

Contamination and Ground Conditions

A Phase 1 Ground Conditions Assessment has been prepared for SLAA site 1061 by Peter Brett Associates (PBA).

In respect of ground conditions, groundwater is anticipated to be at a depth of 18m to 20m below ground level, and groundwater monitoring has shown that the site poses a low risk of contamination.

As noted in the SLAA, the site is close to the Lower Twydall Chalk Pit landfill site. The site is in closure and environmental monitoring shows ground gases concentrations on the perimeter of that site are

relatively low. Consequently, the existence of this site does not pose a constraint to the proposed development.

For residential use, the preliminary Ge-environmental risk assessment for constraints and hazards posed by the existing site conditions is low.

In summary, subject to appropriate foundation design (if needed), the site has been assessed and found suitable for the proposed uses.

Drainage and Flood Risk

A preliminary surface water and foul drainage assessment has been undertaken for the SLAA site 1061 by PBA. The site falls within Flood Zone 1, and there are no watercourses within the site.

The presence of the Seaford Chalk Formation at relatively shallow depths, and the absence of any Groundwater Source Protection Zones within the 500m of the site, strongly suggests favourable conditions for infiltration. A preliminary assessment of on-site attenuation has been undertaken, and there are ample opportunities within the extensive site area to manage surface water through on-site SuDs features.

Foul drainage would be likely to be via the existing combined sewer in Pump Lane that drains to the pumping station at Lower Rainham Road.

Ecology

Preliminary investigations have not revealed any significant on-site ecological constraints.

The site is within close proximity to the estuarine internationally protected habitats. Ecological Planning and Research Ltd have been commissioned to provide advice on any appropriate mitigation measures arising from the location of the site and the need to manage any recreational impacts on the Estuary. It is assumed at this stage that development would contribute to the Swale Estuaries Access Management and Monitoring Strategy (SAMMS), though it is also possible that on-site mitigation in the form of informal recreational areas may also be relevant.

Heritage

The potential impact of development on the setting of nearby Conservation Areas has been considered, and can be appropriately mitigated by the provision of 'stand-off' areas to neighbouring rural settlements to protect their setting.

Landscape

The area has been subject to an initial Landscape and Visual Impact Assessment by David Jarvis Associates Ltd. The site lies within Medway Council Landscape Character Area 21 (Lower Rainham Farmland), whilst land to the north of the site lies in Character Area 5 (Riverside Marshes). The condition and sensitivity of the landscape to change is described as moderate.

The Landscape Assessment notes that development in this location has historically followed the pattern of roads and lanes, and there is scope to accommodate a development that reflects that pattern. Setting

the development back from Lower Rainham Road helps to retain the character of the landscape setting, and the setting of nearby Conservation Areas.

In terms of mitigation, shelter belts are typical of the local landscape and reflect the fruit growing heritage of the area. New shelter belts and open space can provide visual mitigation to the proposed development within the wider landscape.

Noise

There are approximately 200 passenger trains per day and 10 freight trains. It is likely that land immediately adjacent to the railway would exceed the external criteria for garden amenity space, and night time noise may also mean that any properties directly facing the railway line could need an enhanced glazing specification. However, with an appropriate separation from the railway, and with mitigation such as building orientation to provide shielding and appropriate glazing, the railway line does not present a significant constraint to development of the kind proposed.

Transportation

An initial transportation and site access appraisal has been undertaken by PBA. This demonstrates that suitable means of vehicular access to the site can be provided. The results of the Council's strategic highway modelling exercise are awaited in order to assist in the assessment of the wider transport implications of the area and appropriate mitigation measures.

There are currently good public transport services in the vicinity of the site, with the No.131 service using Lower Rainham Road and providing links to Medway Maritime Hospital and Twydall, and to the south, there are existing bus stops on Truro Way and Beechings Way serving the 101, 182, 116, 130 and 131 services to Gillingham, Maidstone, Chatham and Hempstead Valley, amongst others.

National Cycle Route 1 passes alongside the river front to the north, providing strategic cycle access to the Medway Towns. There are a number of local routes identified by Medway Council in the vicinity of the site as suitable or dedicated to cycling.

Utilities

A Utilities Assessment has been undertaken by PBA.

In respect of power, electricity and gas infrastructure exists in Pump Lane and Lower Rainham Road, and enquiries to providers indicate no capacity restrictions or insurmountable reinforcement costs.

Water supply is available within the local area, but Southern Water indicate that off-site reinforcement works would be required to ensure capacity and maintain pressure, which the development is capable of delivering.

Conclusion

The land to the north of Rainham, and lying south of Lower Rainham Road, offers the opportunity to create a highly sustainable urban extension, in the form of a new 'garden suburb'. This area is recognised as a potential opportunity area for such a form of development in the current Local Plan Options Consultation.



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The technical work undertaken on behalf of Begur Ltd seeks to address matters previously raised in the SLAA in respect of this area. In particular, the preliminary landscape and visual impact assessment work demonstrates that the estuarine landscape can be maintained, and development suitably accommodated, to overcome concerns relating to landscape impact.

The range of other technical studies discussed have not identified any significant environmental, technical or infrastructure restrictions to delivery in this area. Begur Ltd would be happy to discuss its technical findings with the Council in more detail in due course.

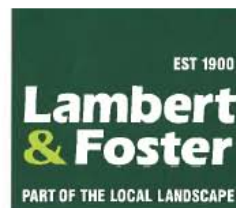


Phase 2

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LIMITED

Appendix 2 – Correspondence relating to SLAA site 1063

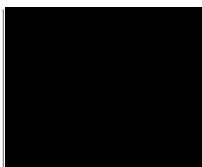
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CHARTERED SURVEYORS | ESTATE AGENTS | PLANNING CONSULTANTS | AUCTIONEERS & VALUERS
77 Commercial Road, Paddock Wood, Kent TN12 6DS T 01892 832 325 www.lambertandfoster.co.uk

9th November 2016

ARM/EB



Dear Kevin

MIERS COURT FARM, RAINHAM

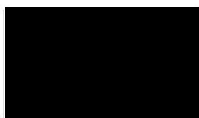
I act for Jack Clark (Rainham) Ltd who are the freehold owners of the land you have identified as Parcel 1063 on the plan that accompanied your letter. My firm arranged a letting to A C Goatham & Son who have approximately 15 years remaining on a 20 year Farm Business Tenancy of this land.

The land was promoted through the Local Authority on a recent Call for Sites which is a matter of public record. My client is regularly approached by land promoters and developers who have interest in entering into Promotional Agreements or Options on the land but my client has made it clear that they are not interested in pursuing any Option Agreements at the present time and are happy with the Agricultural Tenancy arrangement that is in place.

I hope this helps.

With kind regards

Yours sincerely



A R MUMMERY MRICS
On behalf of Lambert & Foster LLP


bloomfields
CHARTERED TOWN PLANNERS



HANDLEYS

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

26th May 2017

To whom this letter may concern

Re: PHESE response to Medway Local plan development options consultation

Thank you for the invitation to Public Health England South East (PHESE) to provide comment on the development options stage of the new Local Plan for Medway. Our comments build upon those offered by PHESE for the first stage consultation in 2016.

Having considered the purpose of this stage of the consultation it is our view that it is not PHESE's role to state a preference for the range of options and scenarios presented as these are a matter for local determination.

Therefore our comments offer high level observations and encouragement to local planners and decision-makers regarding maximising the opportunities to improve and protect the health and wellbeing of the Medway population and reduce health inequalities in the context of the development options for the new Local Plan.

The vision for the new Local Plan is laudable and we would encourage planners and decision-makers to consider how balance is achieved between the component parts which optimise opportunities to promote and improve health and wellbeing and reduce health harms.

Regarding the Local Plan's strategic objectives we would encourage planners and decision-makers to assess the impact of development option proposals from health, environmental, economic and social perspectives through integrated or specific assessments, applying a consistent and transparent approach across all options. We would encourage that the

impacts and mitigations are assessed through consultation with all local stakeholders including the communities affected.

The housing option is informed by a clear-sighted strategic housing market assessment which addresses the range, type and mix of housing need and reflects local demography. Our encouragement is that the housing options explicitly support sustainable communities: ensuring community connectedness and actively plans to avoid community severance.

There is no mention of 'health' in the employment section. However, this may be implicit as meaningful employment is strongly associated with better health and wellbeing outcomes and is crucial to reducing inequalities in health. Our encouragement is that further consideration is given to the skills mix necessary to fill the future Medway health and social care system needs and that this is reflected in local further education plans.

The local town centres development option emphasises how centres play an important role in meeting aspirations for a high quality built environment and strong, vibrant and healthy communities. Our encouragement is for planners and decision-makers to consider the how the mix and density of retail options may have an impact on the health of the population of Medway, particularly regarding obesity, alcohol harm and gambling.

Regarding the natural environment development option, there are clear links between the health of the environment and human health.

Regarding the built environment, the Council's vision is for Medway to be a location of quality development with high quality environments and that this will promote happier, healthier residents. Our encouragement to planners and decision-makers to consider how the aspiration for higher density housing development around transport hubs may impact on the health of the adjacent residents: e.g. noise and pollution. This should be particularly considered in the context of a requirement for Local Authorities to produce Air Quality Plans.

Linked to the natural environment development option our encouragement is for planners and decision-makers to consider opportunities to create or extend connected corridors along the riverside which enhance opportunities for walking, running, cycling and leisure.

For the infrastructure development option our encouragement to planners and decision-makers is to consider opportunities for co-locating amenities and services. This may enable access for local people to wrap-around support and stronger social cohesion e.g.: co-location of libraries, leisure services, General Practices, welfare advice. This is relevant in both urban and rural areas.

The health and communities development option clearly addresses important opportunities to improve and protect the health of the Medway population.

The connections between sustainable transport and public health outcomes are well articulated in the development option. However, whilst connectivity and accessibility is stressed at a local level (including transport hubs) there may be scope to expand this to more explicitly emphasise the health benefits of active commuting and strengthen the relationship between sustainable transport and healthy employment.

The minerals, waste and energy development option clearly addresses current and future use, and PHE would be willing to respond to specific new or amended environmental permit application consultations for relevant processes.

Yours sincerely



Terry Blair-Stevens
Consultant in Public Health – Health and Wellbeing



LOCAL PLAN REPRESENTATIONS

Medway Council Local Plan 2012-2035

1. This Statement contains the representations of London & Quadrant in response to the Draft Medway Council Local Plan 2012-2035 which was published for consultation by Medway Council on the 16 January 2017. Comments were initially invited to be submitted by the 6 March, but this period was subsequently extended until the 18 April 2017.
2. Comments were invited online through the completion of a survey or by commenting on the proposals by emailing: futuremedway@medway.gov.uk or submitted in writing. This Statement containing comments has been submitted by e-mail, although in so doing the online questionnaire has been adopted to provide a structure to the comments. Not all questions have been responded to – only those where comments are considered necessary.

NO	QUESTION	COMMENT
1	Do you agree or disagree with the draft vision for Medway in 2035? please see below	Yes - general support for the growth strategy proposed in the Draft Plan.
2	Do you agree or disagree with the strategic objectives in Section 2 of the draft Local Plan	Yes – although there should be greater emphasis on improving and widening the housing opportunities within Medway.
3	Please rank the options in your order of preference Option 1 - Maximising the potential of urban regeneration Option 2 - Suburban expansion Option 3 - A rural focus Option 4 - Urban regeneration and rural town	Option 1 is ranked the highest preference, followed by Option 4, Option 2 and then Option 3. This is on the basis that the urban areas offer the greatest potential for sustainable development and allow advantage to be taken of established services and facilities.
4	Option 1 please explain what aspects of this potential development are supported	This option is a more sustainable option allowing opportunities for development

	<p>Option 1 please explain what aspects of this potential development are not supported</p>	<p>within established centres and urban areas to occur.</p> <p>Not all opportunities for development within the urban area in support of this option have been optimised. L&Q are site owners of Site 0693 'Land at Medway Road, West of 32 Laurel Road'. This was a site allocated for residential development in the SLAA Main Report, November 2015. This allocation was carried over from the Medway Local Plan.</p> <p>This housing allocation does not feature in the SLAA Main Report, January 2017 and on page 46 of the SLAA is specifically listed as a site 'removed with environmental designations and reserved for specific uses'. However, there are no environmental designations affecting this site and it is not reserved for a specific use. This site should therefore be reinstated as a housing allocation to assist in the achievement of the housing target for Medway and in the realisation of Option 1.</p> <p>A pre-application consultation undertaken in August 2016 (PRE/16/1108) confirmed the development potential of this site.</p>
5	<p>Do you agree or disagree with the policy approach for housing delivery</p>	<p>No for the reasons outlined above (Q.4).</p>
6	<p>Is there anything else Medway Council should consider about the development options or the policy approaches in addition to what you have already commented on above</p>	<p>For the reasons outlined above, it is considered that not all development opportunities have been justified. The omission of Site 0693 for no apparent reason and contrary to recent and clear pre-application advice is an example.</p> <p>The publication of an updated SLAA in February 2017 without consultation or justification for site exclusions renders the approach an unsound basis for demonstrating how the housing targets in the Local Plan can be delivered.</p>

3. Rights are reserved to add, amend or amplify these comments as any additional information is provided by the Council as part of the ongoing formulation of the Local Plan.

Alan Gunne-Jones MRTPI

Managing Director

03 April 2017

0340 | AG-J

13 April 2017

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

FAO: Catherine Smith



By Email

Our reference: I-hjd-uokrep-050417

Dear Madam

MEDWAY LOCAL PLAN DEVELOPMENT OPTIONS CONSULTATION JANUARY 2017 REPRESENTATION BY THE UNIVERSITY OF KENT

We are instructed by the University of Kent (UOK) to submit representations to both the draft Medway Local Plan Development Options Consultation (DOC) document and the Medway Infrastructure Position Statement (IPS). UOK submitted representations to the Medway Local Plan Issues & Options Consultation (IOC) document by our letter dated 29 February 2016. This letter of representation should be read in conjunction with our earlier representations.

We attended with UOK the Council's Education Workshop held on 14 February 2017. The representations set out below repeat some of the comments made at the workshop. UOK would be pleased to have the opportunity to expand on the points raised at the workshop in a follow-on meeting with the Council, as discussed at the time. UOK's 'University Plan 2015-2020' (the University Plan) states it intends to increase the student population at the Medway Campus by a further 1,000 FTE students during the immediate short term.

Representations

1. Medway Local Plan Development Options Consultation Document

Delivering Sustainable Development - Options

UOK supports the sustainable development proposed by Scenarios 1 and 4. These scenarios place greater emphasis on the continued regeneration of the waterfront area, through higher density of development and land consolidation. These scenarios also promote the development existing retail and employment areas to being more mixed use in character, which would assist in the delivering regeneration in this area.

Policy Approach: Economic Development

UOK supports "Policy Approach: Economic Development" (section 5, page 47) and welcomes the support expressed by Medway Council towards further development of the University and other higher education institutions in Medway. We also welcomes the recognition of a link between the University and growth in the wider economy.

Policy Approach: Tourism

UOK supports "Policy Approach: Tourism" (section 5, page 52) and, in particular, the support expressed for development proposals that support the regeneration of Medway and extend its existing cultural offer. The

supporting text refers to the need to improve the evening economy in Chatham, but tends to focus on food establishments, bars and clubs. We consider that the policy should specifically seek to reinforce the importance of a wider social and cultural offering, for both the daytime and evening economy. This is likely to be achieved through the promotion of an appropriate mix of uses in the policy, appropriate infrastructure provision and development opportunities.

We consider that these comments are consistent with the Medway Cultural Strategy 2014-2019, which seeks to “*harness and foster the creative talent within Medway and maximise the opportunities the universities and further education, tourism, creative sector and cultural offer create for Medway’s economy*”. Ultimately, a strong social and cultural element will aid the regeneration of the area, not least due the ability of the University to increase the retention of graduates and support the Council’s objectives of establishing and fostering creative and hi-technology industries. We believe that the policies to be developed around tourism should refer to the Medway Cultural Strategy and not just the evening economy.

We therefore request that the policy approach to Tourism is amended to place a greater importance on the social and cultural elements to the daytime and evening economy, as follows:

“...Proposals for tourism facilities will be assessed against the principles below:

- *Identified need for the creation, expansion or improvement of tourism facilities, including social and cultural uses which comprise the daytime and evening economy*
- *The proposal is appropriate in scale and nature for its location, sensitively designed, respects the local amenity, the characteristics of the built, historic, and natural environment*
- *Maximises opportunities for sustainable travel.”*

Policy Approach: Student Accommodation

UOK supports “*Policy Approach: Student Accommodation*” (section 4, page 35) and welcomes the approach to seeking to locate student housing near higher and further education establishments, with good transport links and access to town centre, leisure and community uses.

Policy Approach: Transport

UOK supports “*Policy Approach: Transport*” (section 11, page 94), including plans to improve public transport provision, the walking and cycling network, strategic roads and rail.

UOK’s Site at Medway Road

UOK’s site at Medway Road was included in the Medway Strategic Land Availability Assessment under reference 0810 and identified as being suitable for employment development. At this time, there are no particular development plans for the site, but UOK consider the site could be developed in the future for a range of academic, residential or mixed-use activities that could support UOK’s University Plan.

Whilst we appreciate there are no site allocations in the DOC, we request that this site is allocated in the next version of the Local Plan as an ‘opportunity site’.

2. Medway Infrastructure Position Statement

UOK would like to see greater recognition of the need for Medway to increase spending on public realm and transport improvements in the local area to the Medway Campus.

We consider that specific public safety, public transport, cycle and public realm enhancements should be identified by Medway Council in consultation with UOK so that they can be included in the Council’s Infrastructure Delivery Plan. This approach would enable the identified to be funded through S106 financial contributions, community infrastructure levy payments or funds received from the South East Local Enterprise Partnership in order to facilitate public realm and transport improvements around the Medway Campus.

Some initial projects identified in our previous representation and discussed at the workshop include:

- Creation of a cycleway across Medway from Strood to Chatham Maritime

- Direct bus links between UOKs Campus and nearby train stations, Chatham Waterfront and to Strood
- Expansion of the late night bus services

An outcome from the workshop was to arrange a meeting between the Council, UOK and the other Universities to identify specific projects so these can be encapsulated in the Council's evidence base. We would be grateful if the Council could contact us to arrange a meeting date.

Conclusion

We welcome the recognition that is given in the DOC to UOK and the "learning quarter" in general. However, UOK considers further recognition should be given to the social and cultural aspects of the economy in Medway, with relevant public realm and transport projects being supported. We have also submitted representations to the IPS, which seek to identify particular infrastructure improvements consistent with the representations made.

We reserve the right to amend or supplement this letter of representation at a later date, if necessary.

We would be grateful if you would acknowledge receipt of this representation. Please contact Emma Andrews on the above details should you have any queries.

Yours faithfully



Emma Andrews
Partner

For and on behalf of Porta Planning LLP

From: [REDACTED]
Sent: 18 April 2017 15:51
To: futuremedway
Cc: Emma Andrews
Subject: Consultation Response : Medway Local Plan and Infrastructure Position Statement

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sirs

I write on behalf of our client, the University for the Creative Arts (UCA), to submit representations to the Medway Local Plan and the Infrastructure Position Statement. I have already submitted these representations online, however in the absence of a confirmation email I also submit them to you again by email. UCA respond as follows:

Medway Local Plan

1. Policy Approach: Student Accommodation (section 4, page 35)

Support, on the basis that this would be consistent with representations UCA has made to previous Local Plan Issues and Options consultation (in February 2016). UCA supports this Policy Approach. In addition, it is considered that there may be opportunities for Medway Council to look at joint private student housing estates, similar to those created in Canterbury, with Universities at Medway students. Given that UCA and the Universities at Medway Campus are located in different parts of the District any proposals or sites will need to be correctly identified so that they are in close proximity to both Campus and are served by reliable and frequent public transport. UCA would welcome the opportunity to meet and discuss this opportunity further with the Council.

2. Supporting text to section on Housing - Paragraph 4.34 (section 4, page 34):

Correction required to change *“the University of Creative Arts”* to *‘University for the Creative Arts’*.

3. Supporting text to section on Employment Land Needs - Paragraph 5.15 (section 5, page 44)

Support, on the basis that University for the Creative Arts (UCA) is a specialist creative arts institution with a wide range of existing relationships with the creative industries and cultural sectors. The University is highly attractive to industrial partners because the students are sources of inspiration and innovation, whether by means of placements, live projects or creative residencies. Companies UCA’s courses are associated with, and who give their time to engagement, include: Apple, BBC, British Film Institute, CNN, EA Games, Kodak, Sky Television, Sony, and Vodafone. UCA supports the reference to the University and in particular, the Council’s recognition of the need to retain graduates and that there is a requirement for studio style premises in urban areas.

4. Policy Approach: Economic Development (section 5, page 47)

Support, on the basis that the University has long-established relationships with business, cultural and creative industries and a wealth of experience working in collaboration and partnership across the regions, the UK and Europe as well as internationally. UCA supports that the Council recognise the links between education providers and growth in the wider economy.

Medway Infrastructure Position Statement

5. UCA would like to see greater recognition of the need for Medway Council to increase spending on public realm and transport improvements planned at Rochester. Given that UCA’s Rochester Campus is located within close proximity (under 1km) to the Rochester Riverside regeneration area, UCA would like to see these arrangements extended to the Campus, providing better links to the University, which would in turn be beneficial to the economic growth and to the high value creative and digital sector of Rochester. In particular, UCA would like to see the repair of Fort Pitt Hill included in the Infrastructure Delivery Plan, as the repair and maintenance of this road is important to UCA and the wider Fort Pitt area.

Please would you acknowledge receipt.

Kind regards
Rik

Henrik Dorbeck
Senior Planner

Porta Planning LLP

67-69 George Street
London
W1U 8LT



www.portaplanning.com

For further information on our team and projects please visit our new website at www.portaplanning.com

Quentin Mann

Mr David Harris
Head of Planning
Medway Council
Gun Wharf
Dock Road
Chatham
ME4 4TR

Reference the proposed New Development of Houses on the Old Rochester Sports complex by Bellway Homes Ltd.

Dear Sir,

I attended a meeting at the bowling club Bells Lane last week on the invitation of Bellway Homes Ltd. to view the proposed building plan for new homes on the above mentioned site.

Whilst I don't have any objections to new homes being built, in fact I live on a new development myself, however I have watched Bellway Homes Ltd build 3 separate estates off Bells Lane already and whilst individually I believe they do not have a requirement to provide infrastructure, collectively I believe they do, along with the developments so far and the attraction of more families with more vehicles who will all need to have enough schools, doctors, hospital services, and shopping areas etc. which are sadly lacking at this time even before this takes place. Roads will be congested even more on the one main artery out of the peninsula.

What are the plans to provide support services if this latest development is given the green light and unlike our development will there be a requirement by the council to provide enough proper vehicle parking spaces for residents and visitors which has been admitted by Bellway homes Ltd there isn't on The Old Stables development.



Quentin M.W Mann (pts)





Rehman Chishti MP

Member of Parliament for Gillingham and Rainham

Medway Council
Gun Wharf
Dock Road
Chatham
ME4 4TR

31 March 2017

Dear Sirs,

Re: Comments on Medway Council's Draft Local Plan

I would like to make the following comments on the Medway Council Draft Local Plan in my capacity as the Member of Parliament for Gillingham and Rainham.

Housing:

I fully understand the need to build more houses due to an ever increasing local population, however what I would say, is that the Gillingham and Rainham Constituency already represents the most densely populated of the 5 principal towns which make up the Medway Unitary Authority. Accordingly, where possible, development should be on brownfield sites. In addition, all development should be conditional on appropriate supporting infrastructure, (specific consideration needs to be given to the over capacity of A2 Rainham taking into account existing and further developments proposed), whether that be transport, schools, health provision or other local amenities. I would urge the local authority to fully take into account the wishes of the local residents when developing this plan.

Medway Maritime Hospital and other health facilities:

On this matter, I urge the local authority, to fully take into account the wishes of the residents of Gillingham and Rainham, and develop this policy in partnership with all other stakeholders to ensure that the Hospital, acute services, along with primary care and community care, is appropriate for the various needs of all local residents taking into account an ever increasing population. I pay tribute to the excellent work of the staff and leadership at the hospital, as well as all other health providers in the area in the work that they do to help local residents. The capacity for accident and emergency services at the Hospital has benefited considerably from the extra 18 million pounds invested in it. The Hospital has also benefited from partnership working with Guy's and St Thomas' Hospital as brokered by Government. Going forwards we need to ensure that the Hospital is always provided with the needed resources to address capacity, as well as transport links in and out of the hospital.

Faith provision:

I urge Medway Council to take into account the views and representations of all faith groups who responded to the consultation across Gillingham and Rainham, to ensure that all residents have adequate provision for a place of worship including vital supporting infrastructure such as parking and an appropriate level of burial space. This will ensure that our faith communities at the heart of our local community life, are able to go from strength to strength.



Education:

In considering the education provision for Gillingham & Rainham, at nursery, primary and secondary level, I urge Medway Council to take into account the representations of residents who responded to the consultation, as well as the representations submitted by schools and other educational stakeholders. This will ensure that additional school provision matches local demand and ensures that the additional provision serves local communities. Taking into account an increased population in years to come, by doing what some local schools have agreed to do, and set an admissions criteria which gives preference to local residents, such as Rainham Mark Grammar School.

I also urge the Local Authority to work with our excellent local Further Education Mid Kent College, Universities, and University Technical College, to ensure that they have the appropriate support that they need to provide the excellent education in their sector to local residents.

Transport infrastructure:

In light of the ever-increasing population of the area, I would strongly urge Medway Council to fully take into account the views and wishes of the local residents, in setting the transport strategy for the future, taking into account key issues such as: road connectivity, the need for a new Lower Thames Crossing, cycle lanes, parking facilities in the local area and an increased capacity on our trains and buses. Due to the over capacity of A2 through Rainham consideration needs to be given to the extra pressure which will follow as a result of existing and further developments proposed.

High Streets/Shopping centres:

I urge Medway Council to fully take into account the views of the local residents and shops in Gillingham and Rainham, in the regeneration strategy of our local High Streets and shopping centres. As someone who has grown up and lived nearly all their life in Gillingham and Rainham, having used the local High Streets as a customer, and hosted countless MP street surgeries on them, the regeneration of the High Streets and Shopping centres is often raised. Further to my previous representations on this matter to Medway Council Executive, it is crucial that we do all that can to regenerate our local shopping centres across Gillingham and Rainham. (Gillingham, Rainham High Streets, Parkwood Shopping Centre, Twydall shopping centre, Watling shopping centre, and Hempstead Valley shopping centre).

Green Spaces:

Out of the 5 principal towns of the Medway Unitary Authority, Gillingham and Rainham has very little green space available, due to the dense population of the towns. I would therefore urge the Local Authority to fully take into account the wishes of local residents in protecting our local green spaces across the constituency.



Sports and Leisure:

The Local Plan should take into account representations from residents, sports clubs and other stakeholders to ensure that the area continues to have excellent support provision, in the local area across all sporting strands.

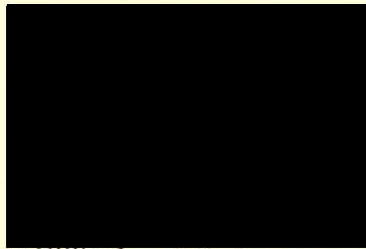
With regards to Gillingham Football Club, I understand that the Mill Hill Site has been identified for the club to undertake significant dynamic development, which would include a new Football Stadium with increased capacity as well as both residential and commercial development to support it.

Like any MP for Gillingham, I would like to see Gillingham FC stay in Gillingham. As a site has been identified, I would like the authorities to carefully consider this, taking into account the views of the local residents, and other stakeholders.

Yours faithfully,

Rehman Chishti MP

Member of Parliament for Gillingham and Rainham



Declaration of interest re Gillingham FC: I am a proud fan and supporter of my Local Football Team, Gillingham FC, and have attended events and matches in my capacity as the MP for Gillingham and Rainham as declared in the register of interests in accordance to parliamentary rules.

BY HAND



Planning Policyand Transformation
Medway Council, Gun Wharf
Dock Road, Chatham ME4 4TR

4 March 2017

Submission: Local Plan 2035

"I was to learn later in life that we tend to meet any new situation by reorganising – and a wonderful method it can be for creating the illusion of progress while producing confusion, inefficiency and demoralisation".

Caius Petronius 65 A.D.

Dear Sir

Following your exhibition at Cuxton Social Club on 20th February and invitation to submit comments, I write to address two of the issues highlighted in your *Executive Summary*, January 2017, namely Housing and Sustainable Transport:

Housing

Medway, jointly with Gravesham BC have identified provision for 29,463 homes in this planning period – and describe a variety of accommodation types (*see your "Approach to Policy Development" options list – last page*) but exclude (or at least do not mention) Retirement Villages.

Mindful of your prediction that there will be *"an increasing number of people over 65 years"* I invite Council Officers to consider whether the foreseen housing requirement could be somewhat reduced by offering residents an alternative to occupying large family homes by means of downsizing.

This does not mean small-scale apartment blocks with community kitchen provision and the occasional visiting warden presence, such as the formula adopted by McCarthy and Stone and other similar builders – but significantly larger-scale villages, offering 24 hour Reception, restaurant, gym, swimming pool, social "pub" atmosphere areas, a doctor's surgery/dispensary and wide access lifts, corridors, buggy-parks – and associated blocks of low and high, secure, accommodation alongside – to cope with most stages of later life.

Developments, such as described, are feasible – offer mixed-occupation from owner-occupied to fully-subsidised – and are offered, in Northamptonshire, Birmingham and elsewhere by the ExtraCare Charitable Trust and other suppliers.

2/...

Retirement Villages, such as described, might be an attractive option to the elderly Medway population – and might bring to the market upwards of 300 otherwise “blocked” family homes, reduce the need for home-support teams and bring other benefits.

Sustainable Transport

The recently-published statistic that an **additional** half a million new vehicles are coming onto our small island **per annum** must be a planning nightmare to local government across the length and breadth of the land.

The A228 increases in use year-on-year, as reflected in your periodic road usage surveys. Congestion, it can be reasonably predicted, will greatly increase with the selection of Option “C” for the Lower Thames Crossing, anticipated later this year.

With the Crossing development joining the beginning of the M2 at junction one, at Shorne, the A228 becomes the obvious route for vehicles heading west. This has major implications for Cuxton village (and the Medway region) unless an alternative route, avoiding an impractical and unappealing de-tour, is to be avoided.

I invite Officers to consider the possibility of continuing the new Crossing junction west, through, admittedly, highly-sensitive green, but primarily-public owned, land to the north of Cuxton – avoiding Cobham – and emerging onto the A228 at the round-about close to Holborough/Snodland and at the junction to the newly-opened Medway crossing to the Peter’s Pit (village) development.

Admittedly this is “blue-sky” thinking – there would be a major environmental outcry and the project would be hugely expensive. But might be more attractive than the air-polluting, noisy and traffic-delay costs of a “do-nothing” policy which would be the inevitable consequence.

You also invite comments on *“the availability of alternatives to car-based travel for rural residents”* and raise the possibility, elsewhere in your document, of *“a riverside path being a draw for residents and visitors alike”* I am aware that a scheme to extend the riverside footpath through Cuxton, to join Strood and utilise the new Medway bridge, Peters Village crossing near Snodland to form a circular walk/cycle path was, I believe, abandoned on the basis of land-ownership and cost.

Perhaps this is an opportunity to reconsider this proposal – thus providing a safe, reasonably flat, route into Strood from Cuxton village which, at present, is poorly-served by an increasingly heavily-trafficked, narrow in places, and intermittently pavement-less road.

Thank you for your consideration of these comments and suggestions.

Yours faithfully


Rob Palmer

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Kay Hutchfield
Chair: Cuxton Parish.