



National Farmers' Union
Unit 8 Ground Floor
Rotherbrook Court
Bedford Road
Petersfield
Hampshire
GU32 3QG

Telephone: [REDACTED]

Medway Council
Gun Wharf, Dock Road
Chatham, Kent
ME4 4TR

Your ref:
Our ref: TO 2018 18
Email: [REDACTED]
Direct line: [REDACTED]
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By email only: futuremedway@medway.gov.uk

Future Medway Local Plan 2012 to 2035

The National Farmers Union is an industry representative organisation that aims to safeguard the business interests of farmers and growers and promote conditions for the industry to secure a competitive foothold in the UK and international economy.

Thank you for requesting our comment in relation to this latest Medway Local Plan consultation.

Question H1: Does the proposed policy for housing delivery represent a sound approach?

We are concerned there are no policies that explicitly enable the construction of rural workers dwellings at or near their place of work in the countryside.

As you are aware the National Planning Policy Framework includes provision for rural workers dwellings through Paragraph 55. This wording is likely to be updated as a result of the recent Housing, Communities and Local Government Consultation, where the following replacement is suggested:

“Planning policies and decisions should avoid the development of isolated homes in the countryside unless... there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside”.

Without including provision to reflect the national framework, the Local Plan may be found unsound and open to challenge during the inspection. A rural workers dwelling policy must be included within the next draft of the Plan.

Question H9: Do you agree with the proposed policy for mobile home parks?

We agree that the council should set out criteria by which it will consider the development of new mobile homes or caravans outside of existing sites. These criteria must include provision to enable the construction of new mobile home parks to accommodate seasonal agricultural labour to harvest fruit and undertake other essential activities on farms.

It would not be appropriate for mobile homes on farms to be given exactly the same consideration as permanent residential dwellings because their use would only be for part of the year to accommodate seasonal farm labour. In this context it may be relevant to specifically exclude mobile homes on farms from the requirements of Policy H6, but enable their construction under Policy E2 Rural Economy.

Question E6: Do you agree with the proposed policy approach for the rural economy?

We support your general approach to Policy E2 as the scope appears to be sufficiently flexible to encompass most farming developments.

We do however query the wording that proposals must “demonstrate positive benefits” without any qualification as to what those benefits might be. We’re concerned this wording could potentially lead to a situation where public opinion drives the applicant to demonstrate positive benefits towards all manner of receptors that might not necessarily be relevant to the proposal itself. For example this wording may lead to a situation where an applicant is required to demonstrate positive benefits towards highways movements, local economic activity or any manner of other possible considerations, because the policy does not specify a relevant scope for the positive benefits referred to.

As such the notion of “positive benefit” may simply be too open ended and as an alternative it may be relevant to consider replacing this term with something that relates to “sustainable development” as defined in terms of the economic, social and environmental effects of the proposal?

In conclusion we hope that the three key areas identified above can be refined in advance of the next stage of Plan preparation and hope that our comments can be taken into consideration as you draft this. We would be very happy to meet with you to discuss how these areas of policy can be further developed.

Yours sincerely


Tom Ormesher
Environment and Land Use Adviser
National Farmers Union South East