

Date as email

**BY EMAIL ONLY**

FAO Catherine Smith

Dear Catherine

**Medway Local Plan Issues and Options Consultation January 2016**

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

**Vision (incl. Duty to Co-operate)**

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

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

**Economy**

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

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

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

**Housing**



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## **The 2015 SHMA**

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

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

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

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

## **Options for growth**

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

## **Environment**

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



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

## Infrastructure



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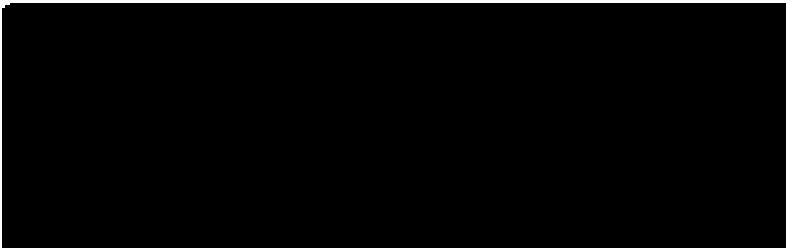


Clearly both Councils will want to reflect on the current consultation on the Lower Thames Crossing and its implications for Medway's development strategy.

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

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

Yours Sincerely



Alan Best

Principal Planner

Swale BC



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