



P L A N N I N G
CONSULTANCY

Representations to the Medway Local Plan

Regulation 19 Stage

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

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1 Introduction

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

- Extent of the landholding and the ability of the family to develop a comprehensive master planned proposal and then allow the later phased release of development areas over the lifetime of the plan period, combined with;
- The land is in single ownership and will not therefore involve complicated land assembly that can affect land use decision taking and lead to later valuation disputes that can cause delays in housing delivery. The promotion of the site direct by the landowner also allows a flexible development framework to be created via the master planning and plan promotion process. This direct relationship with the single-family landowner also increases the prospects of more land value being captured by the planning process.

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

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

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

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

2 Development Targets and Delivery

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

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

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

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

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

2001-02	603 dwellings
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2002-03	676
2003-04	735
2004-05	646
2005-06	530
2006-07	591
2007-08	761
2008-09	914
2009-10	972
2010-11	657
2011-12	809
2012-13	565
2013-14	579
2014-15	483
2015-16	550

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

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

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

2021-22 829

2022-23 775

- 2.6 These anticipated completion rates are clearly a “step change” in housing delivery and it is unrealistic that this level of development will be achieved without a plan led system in place. The Local Development Scheme (LDS) anticipates that the Submission Stage of the draft Local Plan will occur in the Spring of 2018 with adoption of the MLP in 2019. This looks optimistic given the prospects of an Interim Report and the likelihood that a decision on the Lodge Hill application will not be issued until 2019. It is contended that 2020 is likely to be a more realistic timetable for plan adoption, as a best case, if highlighted issues of the SA are addressed. This timeframe creates a planning policy vacuum over the next 3 years where speculative applications will be promoted.
- 2.7 Given the current lack of 5-year housing land supply in Medway, which has been described by recent appeal Inspector’s as “parlous” (Medway have recently suggested their own best guess would be 2.21-2.79 years’ supply), there is the potential for the emerging local plan to have to “retrofit” appeal decision results and speculative proposals that are considered in isolation i.e. outside the local plan process.
- 2.8 If Medway is to have the best chance of adopting a “sound plan” at the earliest opportunity then the building blocks of the plan (considered below) must be solid. If not the anticipated policy vacuum is likely to be extended because the plan will not be adopted and “planning by appeal” will continue to prevail and dominate spatial land use decision making this is not plan- led decision making. This is considered a critical point that is relevant to the comments on the representations on the SA and specifically the role of Lodge Hill (addressed below).
- 2.9 The concerns about the housing land supply pipeline explain the need for early delivery to be at the heart of the spatial decision making. It is important to stress this principle since the options that include major expansion of small rural villages or new settlements will require major upfront infrastructure to be provided (ahead of house sales) this increases investment risk and impinges on land values and viability. This combination of factors in practical delivery terms alone (before other spatial considerations such as transport

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

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

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

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

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

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

3 Emerging Urban Extension Proposal

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

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

Advantages of Urban Extension Options

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

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

Addressing Social Exclusion

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

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

Addressing Inequality and Deprivation

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

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

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

Health

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

Vitality and Viability of Town Centres

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

Improved Access to Employment

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

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

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

3.11 Related economic drivers of the Medway economy include;

- Tourism and agriculture
- Town centre retail

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

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

4 Comments on the Sustainability Appraisal March 2017

- 4.1 This part of the evidence base rightly functions to set the context and objectives as a baseline (Stage A) from which development and refinement of the spatial options and the assessment of their effects (Stage B) can be undertaken.
- 4.2 Notwithstanding the deliverability, viability and comprehensive masterplan land use advantages of phased provision that is unique to this strategic landholding within a land corridor that lies between the built-up areas of Hempstead and Lordswood, this landholding has other land use advantages compared with competing spatial options for growth.
- 4.3 Two land use option objectives that are focused on in the SA and derive from the NPPF are;
- “does it reduce the need to travel by car and improve accessibility to services”;
 - Will the social objective be achieved of creating a socially connected community that is strong and inclusive?
- 4.4 These objectives are purported to be a central component of the Sustainability Appraisal but this is not the case. For instance, the suburban layout Scenario 2 scores similarly to the “rural focus” option and this appears to be justified by the assertion that investment in public transport can resolve accessibility issues affecting the more isolated locations.
- 4.5 The Local Transport Plan of 2011 and the Sustainability Appraisal of 2017 acknowledge the low public transport usage by the resident population of Medway (which is less than 5% of trips) and has declined in recent years which does not reflect the regional trend. The potential for an urban extension growth corridor to increase the frequency of bus linkages and open up new routeways, will under this option, also benefit the existing catchment.

- 4.6 This benefit for the existing community was acknowledged at a recent appeal decision at Gibraltar Farm (APP Ref APP/A2280/W/16/3143600 for an area of 23.93 ha. which forms part of the corridor). The Secretary of State found that this site “was accessibly located (paragraph 22) and that this development of circa 450 dwellings would also benefit local residents in terms of play space and sustainable transport provision. These associated benefits would not occur for a more isolated growth option in the rural area.
- 4.7 One of the objectives of the Medway Local Transport Plan is a ‘Fast-track style bus link’ with park and ride and expansion of the cycle and footway links. These realistically are objectives that are best achieved by both the riverside regeneration option, which the Attwood family support (subject to certain caveats on capacity) and the suburban extension options.
- 4.8 Locating development where non-car modes of travel are not easily available is also important for affordable housing occupiers where car ownership is lower. The population of Medway is anticipated to increase from 276,000 to 330,000, a 20% increase. 50% of this increase is from persons of 65 years or older. Again, the propensity of this age bracket to use bus and non-car modes is increased, if spatially housing is located close to existing services and facilities, including medical hubs.
- 4.9 It is a national objective to manage transport modal shift toward more sustainable means of travel and improving accessibility to services and facilities for all. This does not appear to be currently reflected in the Sustainability Appraisal ranking of the options.

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

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

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

Inclusion of Lodge Hill

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

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

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

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

- 4.14 For instance Page 22 of the Sustainability Appraisal states “paragraph 4.27 supports Lodge Hill and concludes that the economic and social dimensions are positive and the environmental interests could be addressed through the mitigation and compensation strategy”. Paragraph 4.27 states the “Council support for Lodge Hill as representing sustainable development.” Whilst part of the overall quantum of housing is phased beyond the plan period with delivery anticipated by 2025, the Attwood family object to the commitment in the local plan to Lodge Hill, which should not be considered before urban extension options are fully explored. Otherwise this approach has to affect the objective judgements of the Sustainability Appraisal and cannot therefore be relied on to test options.
- 4.15 For instance, the Sustainability Appraisal at Page 19 states “Development in peripheral locations has the risk of increasing car based travel”. Because of the desire of the Local Plan to support Lodge Hill whatever the mitigation proposed, the negative weighting to this risk which the SA will weigh up is likely to be minimal and on this basis, disadvantages the urban extension options at this option stage of the assessment.
- 4.16 The Sustainability Appraisal also references various reports including Kent and Medway “Unlocking the Potential ...Going for Growth South East LEP” March 2014. This joint submission for funding by Kent and Medway references Lodge Hill as a clear commitment of the Council. This again suggest the spatial “mind-set” of the Council is not open at this point. Lodge Hill is referred to as “the largest residential development site in North Kent outside Ebbsfleet Valley and one of the “largest residential development sites in the South East LEP area and is **essential** to accommodating Medway’s future growth”.

- 4.17 Notwithstanding the Council's historic commitment to Lodge Hill, it is imperative this local plan process must consider spatial objections objectively and the true planning merits of opportunities for urban extensions weighted fairly in the consideration of options.
- 4.18 The need for housing, including affordable housing, in the district is recognised as are the benefits of providing it. The issue for the Plan is to set out policies to fully meet that need and consider whether Lodge Hill is a suitable place to provide it.
- 4.19 This issue has already been tested previously through the examination of the withdrawn core strategy. The inspector considered that the Core Strategy's proposals for Lodge Hill would have significant adverse impacts and would seriously undermine the Government's objectives set out in the Framework to halt the overall decline in biodiversity.
- 4.20 It was this conclusion of the inspector that resulted in the council eventually agreeing to withdraw the core strategy. Notwithstanding, in the light of that decision and the inspector's conclusions, the council subsequently resolved to grant planning permission for a mixed-use development at Lodge Hill including circa 5,000 dwellings.
- 4.21 Since specific policies in the Framework indicate development at Lodge Hill should be restricted (Sites of Special Scientific Interest/Birds and Habitats Directives; Framework paras 118-119) the "significantly and demonstrably" test in paragraph 14 of the Framework does not apply in any event. The core strategy examining inspector has already concluded that substantial harm to designated assets would arise from proposed development at Lodge Hill.
- 4.22 It is asserted in the draft plan, that the manner in which such harm can be mitigated is currently under investigation and will be presented to the Lodge Hill inquiry. This is not relevant because the council has not fully investigated what alternatives are available to

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

- 4.23 Initially the council resisted the withdrawal of the core strategy which led to an exchange of correspondence with the inspector. In a letter dated the 7th August 2013 the inspector, when considering the soundness of the core strategy, set out her concern with the sustainability appraisal and whether it met the requirements established in **Heard v Broadland District Council** i.e. that alternatives must be appraised as thoroughly as the preferred option. She also raised the implications of **Cogent Land LLP v Rochford District Council**, that an addendum report must be a genuine exercise rather than a mere justification for decisions that have already been taken.
- 4.24 It is quite clear that matters in respect of these issues currently remain as they were at the time the core strategy was withdrawn. It is self-evident from the SLA that many sites are available that are not subject to the constraints that pertain at Lodge Hill and it should be said, better located in relation to the urban area, so that they can be considered as planned urban extensions.
- 4.25 For the Secretary of State to make an informed decision on Lodge Hill, an objective Sustainability Appraisal will need to have been undertaken on alternatives and such evidence presented to the inquiry for examination. Such an exercise will need to objectively demonstrate that there are not enough alternative sites to Lodge Hill in Medway and that the only way to meet the overall housing requirement is to develop a site where the presumption in favour of development does not apply and where development in any event should be restricted, a conclusion already reached by an examining inspector. If and until this proves to be the case, the Plan must discount the 3,000 dwellings proposed to be included from the Lodge Hill site.
- 4.26 Attwood family note that the failure to properly assess alternatives will leave the council vulnerable to a High Court challenge to the adoption of the plan; another matter raised by the inspector in her letter of the 7th August 2013. The same will apply to any decision by

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

Green Infrastructure

- 4.27 The Sustainability Appraisal in its weighting methodology is felt to overstate the role of green infrastructure as comparable to a “magic solution” to mitigate impacts which reinforce certain assumptions about the rural options. For instance, at the Hoo Peninsula, Option 3 identifies up-to 6,500 dwellings at Hoo St.Werburgh and 2,500 additional houses at Hoo Peninsula and scores the impact comparatively neutrally as “green infrastructure could mitigate the impact”.
- 4.28 The masterplan will demonstrate how the provision of upto 4,500 dwellings in this land corridor can be achieved within a comprehensive landscaped framework. This is possible as the non developable area represents around 62% of the total landholding. This will serve to integrate the development in the landscape by;
- Linking the existing fragments of Ancient Woodland on either side of the land corridor to create a more cohesive green network;
 - Improving the existing cycleway and footpath linkages with the existing community and responding to desire lines such as existing parks and schools and the Hempstead Shopping Centre for instance.
 - To ensure the surface water drainage strategy is complimentary to the Green Infrastructure strategy for the site so that the green network is multifunctional.
 - The Capstone Country Park can also be extended by the masterplan to create a landscaped area that will form a central island which will maintain a separation corridor of greater width at this point to other designated ALLI corridors;
 - The creation of areas of open spaces and landscaped corridors as part of the Green Infrastructure network will enhance biodiversity and wildlife corridors and recreation can be better managed through the provision of trim trails etc enhancing this areas functional attractiveness and diverting recreational pressure away from the riverside SPA.
 - The green network will also serve as a buffer from the AONB with an improved screen adjacent to the motorway which provides a strong delineating boundary feature at the southern boundary of the site.

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

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

Green Belt

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

Duty to Cooperate

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

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

5 Conclusions

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

- The necessary complicated land assembly, contamination costs, flood risk and environmental designations and overall viability issues that have historically affected delivery in the absence of public funding and even with the benefit of public funding
- As a riverside location, these areas are key pathways for green infrastructure, promoting walkways, footways and enhanced boat patronage as well as leisure, recreational employment and community uses which may reduce expectations of the housing yield;
- Infrastructure like schools and health provision which are land hungry will also need to be planned for and may erode the net developable area and density expectations;
- Finally, realistically to achieve viability most of the riverside sites will require high density development which is likely to result in high proportions of apartment accommodation. Other locations will need to provide the required choice of housing needed by Medway as a whole.

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

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

- a) Protection of the rural and coastal landscape to the north of the Medway for the sake of tourism, agricultural, landscape and its environment sensitivity;
 - b) Support for the regeneration of the riverside, subject to the riverside areas being assessed also as key pieces of green infrastructure alongside the river ,where a range of open space, leisure and education/community uses must be delivered (and mindful of the potential deliverability lag highlighted earlier in this statement).
- 5.3 For these reasons, the urban extension option is favoured and achieves best the requirement of Paragraph 151 of the NPPF namely “Local Plans must be prepared with the objective of contributing to the achievement of sustainable development.”
- 5.4 The character of Medway mainly comprises an urban area and a rural area that is north of the River. The headland area contains extensive areas of estuarine landscapes which are heavily protected being designated as SPA’s and SSSI’s and SAC’s. This rural character assists with tourism and contains land of higher agricultural land quality, as identified in the supporting report prepared by BTF Lister. The headland area is more sensitive in landscape terms and isolated and not as easily accessible to the Medway town centres. Housing development of a significant scale in this location would require supporting infrastructure and facilities to promote self-containment. A new community would also be less socially assimilated with the wider community compared with an urban extension and infrastructure improvements would not impact on the existing community. Finally, development on the headland would impact on the natural and farmed landscapes of Hoo, this wider landscape setting is important to Medway’s sense of place.
- 5.5 For these reasons whilst the scale of development pressure is likely to require a range of development options, as part of the refinement and assessment of the options, it is asserted that given the fulfilment of a greater number of plan objectives, the urban extension model should be weighted in the SA ahead of the rural focus/new settlement options..... which may still be required after the urban extension site search has been exhausted.

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

- The whole of the corridor can be planned comprehensively and brought forward in a phased way over the lifetime of the plan.
- The site, being in single family ownership is free of land ownership and complicated multi owner agreements and because of its location close to existing services and infrastructure can address the chronic land supply position quicker than other alternatives.
- The site is more accessible to town centre services and facilities and public transport investment and improved connected via cycle ways and footway linkages will help to regenerate central areas and local communities (some of which are deprived such at Luton,)
- This option can create a more socially connected community.
- The creation of a truly mixed use development across the 407-hectare landholding will include business park provision close to the M2 motorway and the existing resident catchment helping to reduce out commuting and attract inward investment.
- Masterplan proposals which are being refined, will demonstrate that the existing green infrastructure can be linked to create a more coherent publically accessible recreational landscape and biodiversity resource that will maintain a separation function.
- One of the main planning objectives set out in the NPPF is to manage travel demand and the urban fringe expansion combined with the riverside regeneration achieves significant benefits compared with other options. The Strategic Transport Assessment when fed into the Sustainability Appraisal findings must recognise this current shortcoming if the options are to be fairly compared.

- There are no heritage, flood risk, agricultural land quality issues affecting the site (compared with higher grade land affecting other options) and the designated biodiversity interest is of a lower magnitude compared with the other options.
- This strategic land use option could deliver up-to 4,500 dwellings at a density of 40 dwellings per hectares.

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

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

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