

Gravesham Borough Council

Policy Comments on Medway Local Plan 2012-2035 Development Options Consultation Document

Introduction

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- 02 The document which was published on 16 January for public consultation purposes excluded details of those capacities but retained a diagrammatic representation of each scenario. Given that the original Cabinet report was a public document and it was formally approved for publication, Gravesham Council is regarding it as a significant background document which helps in understanding the proposals. Consequently, the following comments are based on the consultation document but also include information on the capacities within the Cabinet document as they have aided the Council's consideration of the likely quantitative implications of the growth options being consulted upon.

Plan Period and Growth Requirements

- 03 Both Medway Council and Gravesham Borough Council commissioned a Strategic Housing and Economic Needs Assessment (SHENA), which forms the basis of the growth requirements set out in the consultation document. We agree with the conclusions reached in the study (see Medway IGNA Technical Paper) that Medway should plan for at least some 29,500 dwellings covering the plan period 2012-2035. However, given the environmental and planning constraints within the housing market area i.e. Medway, Gravesham and Dartford, we believe that any excess capacity identified should be utilised towards meeting the need of the wider housing area.
- 04 With regard to employment, the Council also agrees with the conclusions reached by GVA that a diverse range of employment sites are needed to meet employment floorspace requirements and the excessive supply available at Grain and Kingsnorth is not suitable to meet this need. In terms of retail, we also agree that development should be directed towards Chatham Town Centre. Any retail floorspace directed towards other centres should be commensurate with their role; otherwise the relevant retail tests will need to be applied as appropriate.

Housing

- 05 During the Medway Local Plan Issues and Options Consultation, in February, 2016, Gravesham Council submitted a representation which requested that the document

should state that Medway is embarking on the plan preparation process with the intention, together with Gravesham, of meeting the objectively assessed need identified for their housing market area. This, it stated, would accord with Duty to Co-operate requirements.

- 06 Subsequent duty to co-operate discussions between, Gravesham and Medway have explored this matter in further detail. It has been agreed by both authorities that all LPAs within the housing market area should seek to meet their own objectively assessed need (OAN) requirements. In the event of a land supply shortfall being identified, the relevant local authority will clearly need to demonstrate that all sustainable options have been explored before any of the OAN can be exported to another authority within the housing market area or elsewhere. For clarity, Gravesham BC has also been involved in similar discussions with Dartford Borough Council given that Gravesham's housing market area includes both Dartford and Medway. Work is currently on-going to fully explore the residential land supply available in Gravesham and options will be published for consultation later in the year.
- 07 The Cabinet consultation document clearly shows that, as things stand, Medway could potentially contribute towards meeting the wider housing market area's needs. Paragraph 3.18, draws attention to the sites shown on the map in Appendix 1A, which have been identified as having potential for development. It states that complete delivery the delivery of entirety of these sites as shown, would represent substantial over development when compared to Medway's OAN. That appears to indicate that there could be some spare capacity in overall terms.
- 08 Furthermore, after taking into account Medway's housing requirement of circa 30,000 dwellings, its pipeline supply of 18,200 dwellings and its residual requirement of 11,800 dwellings, all the scenarios produce a surplus. This ranges from 600 to 3,800 dwellings without Lodge Hill and 3,600 to 6,800 dwellings with Lodge Hill. For clarity, it is assumed that Lodge Hill has been included in the 7,000 estimate for suburban and rural growth in scenario 1 and, if not, the top of the range would be higher.
- 09 The document also reveals that additional scenarios could be developed, if required, by mixing elements from different scenarios. For example, scenario 1 identifies 7,000 dwellings for suburban and rural growth, whereas scenario 2 identifies 13,600 dwellings for suburban development around Rainham, Capstone and Strood, the expansion of Hoo St Werburgh and smaller scale growth of the villages. Consequently, it appears that an additional 6,600 dwellings could be added to scenario 1. This serves to illustrate that even if the application of constraints to the existing scenarios was to reduce some capacities, those reductions may be capable of being made good by creating alternative scenarios from the components of the other existing ones.
- 10 Gravesham Council considers that Medway Council should include sufficient flexibility within its Local Plan to meet the wider housing market area's need should excess residential land be identified during the plan making process. Consequently, the Council considers that the amendment previously proposed in response to the 2016 Issues and Options Document, still remains valid.

Employment

- 11 The consultation document outlines employment land requirements in Medway for the plan period. However, there appears to be some confusion between floorspace and land requirements. In paragraph 3.1, reference is made to office space (presumably floorspace) and then to industrial and warehousing land in the same table. However, all measurements are in square metres. Land areas are normally given in hectares rather than square metres. Under the heading “Employment Land Needs” in the fifth chapter, reference is made to 90 hectares of floorspace. This should presumably be 90 hectares of land. The table then refers to employment land requirements which are set out in square metres. This should presumably refer to floorspace rather than land requirements. Some clarification is required.

Minerals

- 12 In its Policy Approach to Minerals, the document states that the Council will seek to safeguard all existing mineral wharves from development which may prejudice their continued use. It also seeks to allocate sites for the processing, sorting and distribution of secondary aggregates displaced through planned redevelopment schemes. Whilst Gravesham Council welcomes this policy approach, it is concerned that mineral wharves appear to have been overlooked in relation to scenario 1.
- 13 In scenario 1, provision is made for the relocation of firms displaced from the Medway City Estate to a modern business park to the north of Kingsnorth. Given that this location is landlocked and cannot be served directly from the River Medway, it is difficult to see how this can be regarded as a suitable relocation site for the existing mineral wharves.
- 14 Gravesham Council needs to ensure that the use of mineral wharves is not intensified in Gravesham due to losses of capacity in Medway. The Gravesham Local Plan Core Strategy has a number of riverside regeneration sites where development has been proposed. Consequently, Gravesham Council seeks clarification that a suitable location or locations are identified within Medway to meet the area’s mineral handling capacity, including that displaced from the Medway City Estate and any other riverside site which might be affected by other growth options.
- 15 The Policy Approach to Transport and the River Medway appears to be less rigorous than that for Minerals as it only states that the Council will determine the need to safeguard wharves. The Minerals policy approach provides a strong commitment to relocation i.e. safeguard all wharves from development and allocate land for relocation if facilities for handling minerals are displaced. In other words, the need for safeguarding is a given from the outset. The Transport and River Medway policy is conditional on the need for safeguarding to be proven. Consequently, Gravesham Council would support the deletion of the words “determine the need to”, from the second paragraph of the policy approach to Transport and the River Medway.

Infrastructure

- 16 All the options include, to varying degrees, development proposals in the western part of the Borough, at Cliffe and Cliffe Woods, Hoo St. Werburgh, Lodge Hill and in the Green Belt to the west of Strood. Development of any or all of these options will have implications for areas of nature conservation which straddle the boundary, as well as the wider countryside, transport, educational and other infrastructure, including health, in Gravesham.
- 17 Gravesham Council consequently welcomes the regard given under paragraph 3.31, to the need for continued discussions with Gravesham Council on these matters. The Council seeks assurances that the impact of the development of any of the scenarios on Gravesham's environment and infrastructure will be fully taken into account and appropriately mitigated.
- 18 Given that waste water from Shorne and Higham areas is treated in Medway, Gravesham Council would also advise that further discussions cover the capacity of Whitewall Water Treatment Works in order to ensure that it has sufficient capacity to accommodate growth in Medway as well as any growth in Shorne and Higham.

Green Belt

- 19 Gravesham Council welcomes the commitment to review the Green Belt in paragraph 7.17 and considers that meeting objectively assessed needs for housing and/or employment is an exceptional circumstance which justifies a review of Green Belt boundaries. A key component of progressing work on Gravesham's Site Allocations and Development Management Policies document, involves giving further consideration to the Green Belt within the Borough. Consequently, Gravesham Council would welcome continued discussions, through the duty to cooperate, regarding any Green Belt review and implications for both authorities including opportunities for joint working, especially as developers have promoted sites in the Green Belt to the west of Strood, including Chapter Farm, which straddles the local authorities' boundaries.
- 20 Scenario 2, Suburban Expansion, considers potential development in the Green Belt to the west of Strood. One of the reasons for its inclusion is to determine if special circumstances exist that would require the Green Belt boundary to be reviewed. Scenario 4 brings together components of the urban regeneration, suburban expansion and rural development scenarios but excludes the Green Belt land to the west of Strood. If special circumstances were found to be justified in relation to scenario 1, which arose as a result of Gravesham's need to meet its development needs, Gravesham Council would wish to see those special circumstances applied to scenario 4 as well as scenario 2 and it therefore requests that land to the west of Strood be included as part of the suburban component of Scenario 4.

Other Strategic Policy Issues

- 21 Gravesham Council welcomes the references to SAMMS, the Project Board and the intention to include a policy in paragraphs 7.7 – 7.9 and in the Policy Approach to SAMMS. The Council would welcome being kept up-to-date with discussions being

held with Natural England regarding the suitability of the identified scenarios in terms of their impacts on areas of nature conservation (Thames Estuary and Marshes SPA/Ramsar).

10 April 2017

Appendix 1 Residential Capacity of Growth Scenarios

Scenario 1	A Medway City Estate and Chatham Docks	5,000
	B Central and Waterfront Sites in Chatham and Strood – higher density and land assembly; Mill Hill, Estate Renewal	5,500
	C Suburban and Rural Growth	7,000
	Total	17,500
Scenario 2	A Suburban Development around Rainham, Capstone and Strood	10,700
	B Lodge Hill	3,000
	Hoo St Werburgh	2,000
	Smaller Scale Growth of Villages	900
	Total	16,600
Scenario 3	A Rural Town at Hoo St Werburgh	6,500
	B Lodge Hill	3,000
	Expanded Villages: Cliffe, Cliffe Woods, High Halstow, Lower Stoke, Allhallows, Grain	2,600
	C Suburban and wider rural development: Rainham and Capstone Valley	2,280
	Mill Hill	850
	Medway Valley	180
	Total	15,410
Scenario 4	A Chatham Docks, Medway City Estate, Chatham and Strood Waterfront and Central Areas, Mill Hill, Estate Renewal at Twydall	6,500
	B Rural Town including Lodge Hill	3,000
	Hoo St Werburgh	6,500
	Incremental Growth in Villages	650
	C Smaller Scale Suburban Growth: Rainham and Capstone	2,000
	Total	18,650

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