

22 March 2017

Please ask for: Alan Best [REDACTED]  
[REDACTED]

Dear Catherine

**Response by Swale Borough Council in respect of Medway Council Local Plan 2012-2035, Development options Regulation 18 consultation report**

Thank you for giving Swale Borough Council (SBC) the opportunity to comment on the development options consultation. The Council has reviewed the documentation, including the Interim Sustainability Appraisal report.

Before considering the development options and themed issues themselves, SBC would wish to make four broad points as follows:

1. Progression of the Medway LP to this key stage is welcomed and SBC recognises the importance of securing a sound plan given the age of the current adopted Local Plan. To this end, SBC will continue to work with Medway Council (MC) in respect of strategic and cross-border issues, particularly in the areas of housing, economic transport, environmental matters and air quality.
2. SBC welcomes Medway's vision and ambitions. Given the social, economic and environmental links between the Councils, it is important to the overall outside perceptions of this part of North Kent that there is a prosperous and thriving Medway.
3. Whilst it will be for MC to finally determine whether its OAN can be met in full, SBC welcomes the starting basis for the development options consultation; namely that the options explore the ways in which the OAN can be met in full within Medway's borders. SBC notes from paragraph 4.58 of the SA that other alternatives not pursued at this stage, include the setting of a reduced development target in recognition of the range of significant constraints including environmental designations, viability, land assembly, infrastructure costs and dependencies. In the light of SBCs own experience and the evidence presented by MC for this consultation thus far, a very compelling case indeed would need to be made for Medway's OAN not to be met in full in Medway. In the event of any change to MC's position in this regard, SBC is sure that there will be early and full engagement under the Duty to Co-operate.
4. Whilst it has no specific views on Lodge Hill, SBC understands the difficult position for plan making that its on-going uncertainties present. SBC fully support the need for MC to de-risk this situation. It is noted that MC's support for the Lodge Hill proposals has resulted in their inclusion within all the development options as a 'given'. SBC questions whether a further option(s) should have been considered at this stage that presented a scenario that considered the effects of an excluded Lodge Hill. This would have enabled the potential approaches set out in paragraph 4.29 of the SA report to have been tested now.

## The Development Options

By way of a general overview, SBC comments that:

1. Whilst broadly agreeing that the four development options/scenarios presented by the consultation document are a basis upon which to assess the potential future development strategy, it notes that a future preferred option could involve a hybrid approach. As indicated above, SBC also question whether options excluding Lodge Hill should have been included at this stage.
2. Notwithstanding 1 above, SBC is satisfied that the presentation of the development options is reasonably clear. However, the options do need some careful scrutiny to determine the variables at work between them. SBC noted that information on development quanta within each option found on the Council's website<sup>1</sup>, was not included within the main consultation document pdf<sup>2</sup> or its Executive summary<sup>3</sup>.
3. Allied to 2, it was not always easy to reconcile the development 'pipeline' total indicated by the housing trajectory in the latest SLAA with the quanta referred to in the development options themselves. For example, it was not entirely clear as to the extent of development quanta from the urban areas in option 1 that are retained as core elements in other options and, likewise, whether there were contingencies which lead to provision over and above the OAN.
4. It is not immediately clear as to why a windfall allowance would only be applied to years 3-5 when an allowance applied to the rest of the plan period could have the potential to significantly reduce the amount of land needing to be allocated?

Rather than providing comments on each of the four development options, having considered the potential issues raised by each option, SBC comments are aimed at the possible scope for a future preferred option. Some supplementary commentary on individual options is included under the later themed issues.

### A priority to urban regeneration

Given the importance attached to regeneration and the national priority toward the use of previously developed land, SBC consider that the starting point for any preferred option should be the degree to which development needs can be met from urban regeneration. Therefore, it considers that the approach advocated by option 1 in respect of urban regeneration should be pursued and maximised as far as possible. SBC notes the potential advantages of the option as set out in paragraph 4.38 of the SA.

In advocating this approach, SBC recognises the potential challenges - viability, deliverability, housing mix and maintaining the quality of life within the urban area. Fundamental to delivery of option 1 will be the realism of the redevelopments of the Medway City Estate, the Chatham docks

<sup>1</sup> <http://medway.gov.uk/pdf/Appendix%201B%20urban%20map%20and%20text.pdf>

<sup>2</sup> <http://medway.gov.uk/pdf/Local%20Plan%20Development%20Options%20consultation%20document.pdf>

<sup>3</sup> <http://medway.gov.uk/pdf/Executive%20Summary.pdf>



INVESTORS  
IN PEOPLE



proposals and other estate renewal. However, it is clear from the other development options, where these urban regeneration opportunities appear to be removed or reduced, pressures increase as a result at the peripheral urban edges, particularly the Capstone Valley (landscape and AONB setting issues) and on land to the east of Rainham (transport, landscape and settlement separation issues for Hartlip and Upchurch).

Whilst SBC recognises that even under the above approach, there will almost certainly be a need for greenfield development, whether this is at City edge and/or the Hoo Peninsula, it would urge MC to make the fullest assessment of the deliverability of urban regeneration sites (and other sources such as windfalls) to justify the 'balance' of development needs that will need to come from other locations.

### Urban extensions

If the release of Greenfield sites is shown to be justified, there may be some grounds for caution in the use of urban extensions which should not always necessarily be viewed as an easy win approach. SBC has pursued such incremental growth to existing urban areas over many years and whilst this can provide for accessible sites, it presents challenges associated with integration into existing and historic transport networks and encroachments into spaces that separate urban areas with neighbouring villages where there are issues to securing successful landscape integration and/or wider green infrastructure gains. Some of these issues are reasonably acknowledged by the SA, although SBC queries the SA conclusion that there would be a positive long term effect in terms of green infrastructure issues. At this stage, SBC consider that there would be a question mark on this issue until further work is done to demonstrate a positive outcome.

For Swale, the challenges presented by urban extensions could be potentially present within those proposed within all of the options to the east of Rainham, particularly those in option 2. At the local level they include:

1. Questions of landscape and visual impact and the perceptions of continued settlement separation for communities at Upchurch and Hartlip. Here there has been much change in the landscape character as recreational and other pressures in the area have made their presence felt - not always in a positive fashion.
2. Further loading of the A2 corridor both east and west with associated implications for the AQMAs within the urban centres and Newington and for urban and village quality of life, particularly, for SBC, within the rural communities between Rainham and Key Street (A249).
3. Ensuring the continued efficient access for Swale residents (and emergency vehicles) to Medway Maritime Hospital which is currently affected by poor journey times.

### A potential preferred option

Before determining that Greenfield urban extensions are an appropriate part of the development strategy of the preferred option, MC should give consideration as to whether it's preferred option might appropriately represent a variation/hybrid of three of its development options that both maximises urban regeneration whilst providing a greater focus upon improving the relative remoteness and connectivity of rural communities on the Hoo Peninsula. In short, such an approach would pursue option 1 as far as possible, but with the addition of a combination of options 3 and 4 (or similar) to provide both a rural town and expanded villages on the Hoo Peninsula.

In putting forward this approach for consideration, given uncertainties, SBC has not attempted to reconcile development quanta and whether its approach would lead to under or over provision.

SBC recognises that there would be challenges to such an approach. In addition to potentially 3,000 dwellings at Lodge Hill, it would also require consideration to a combination of development at small rural town level at Hoo St. Werburgh and a variety of development levels at Cliffe, Cliffe Woods, High Halstow, Lower Stoke, Allhallows and Grain. Challenges would include their overall impacts on the transport network, rural communities, loss of BMV and landscape/biodiversity capacity. However, such an approach might be viewed as offering potential benefits to more isolated rural communities lacking some services whilst bringing benefits to the environment via enhancements to green infrastructure.

### Conclusions on development options

Clearly part of the reason for SBC requesting that further consideration be given to the above approach is the potential effects that arise from the consideration of urban extensions.

Should the SBC suggested approach be demonstrated as inappropriate and that urban expansion are considered to be justified as part of a preferred option, SBC will welcome early engagement with MC, via the Duty to Co-operate, to establish an integrated approach to addressing issues both sides of our administrative boundary. The scope of such discussions should include:

- a) Landscape, recreational pressures and settlement separation impacts, whilst bringing forward a green infrastructure strategy for communities; and
- b) Impacts associated with increased traffic levels in the A2 corridor. Specifically, in the case of the level of growth proposed for Rainham under option 2, the Council would wish to understand further the reference within the consultation document to the possibility of major new transport schemes. At the A249 end of the A2, discussions and evidence should also consider the relationship with improvements already required to address Swale and Maidstone growth.

## **Comments on themed issues**

### Housing provision

SBC notes that MC's technical assessment has concluded that the Local Plan needs to provide for 29,463 new homes over the plan period and that this represents an OAN of 1,281 dwellings per annum over a 23 year period.

The 2015 MC/SBC Duty to Co-operate discussions highlighted some SBC reservations over certain aspects of the joint Medway SHMA work. In respect of the wider housing market area definition, SBC was not convinced that the links between Swale and large parts of the proposed HMA were sufficient or consistent with Swale's own 2015 SHMA which indicated that Swale did not cleanly fit into any one alternative HMA. Swale's SHMA concluded there was enough evidence to show that a Swale centred HMA was a pragmatic response to less than clear cut geography. This view was accepted by the Swale Local Plan Inspector.

It is acknowledged that the Swale SHMA did indicate links in the west with Medway (Sittingbourne and the Isle of Sheppey) and although this more localised association has generally been acknowledged by the Medway SHMA work, SBC nevertheless notes with some concern that the whole of Swale remains included within the Medway SHMA HMA that also includes Gravesham, Maidstone and Tonbridge & Malling. It remains Swale's view, supported by its own 2015 SHMA, that any such links with Medway should be reflected in Duty to Co-operate discussions rather than by the inclusion of the whole of Swale within the larger Medway HMA. It should be stressed that such discussions should only relate to the western part of Swale Borough.

It should also be drawn to MC's attention that the possibilities of early Local Plan reviews as/required by the Maidstone and Swale Local Plan Inspectors could lead to development industry calls to increase housing provision in Medway due to alleged 'unmet needs'.

In respect of affordable housing needs, MC's assessment identifies a high level of demand for affordable housing at 17,112 over the plan period. SBC observes that this would account for some 60% of Medway's total OAN provision. It is routinely the case that the development industry will push for a higher OAN so that the affordable housing need can potentially be met. MC will want to put in place a robust response as to the realism and overall sustainability of any such calls from the industry.

Finally, and notwithstanding the above, the recently published Government 'White Paper' proposes a future consultation on introducing a standardised approach to assessing housing requirements. The outcome of this may result in the need for a Medway SHMA refresh in due course. Depending on its timing, sufficient flexibility may also need to be built into the housing numbers for any preferred option to address any changes that may arise.

### Employment provision

SBC support MCs intentions to address employment land issues and agrees that the City is well placed to create a strong economic hub to the benefit of the eastern part of north Kent as a whole. SBC notes that an enhanced role in the strategic distribution market is envisaged for Medway as a result of the future Thames Crossing. Whilst there is potential competition with the sector of floorspace traditionally offered by Swale, it is considered more likely to lead to separate and niche markets being delivered, with SBC potentially needing to consider further such floorspace as part of its own future local plan review.

### Retail and town centres

SBC acknowledges the retail and leisure based needs for the plan period. Whilst this may have some potential to further draw spend away from Swale centres, SBC accepts that the needs identified are necessary to ensure the proper functioning of the City and do not appear to indicate a more strategic aspiration to move the City above its position within the retail hierarchy of centres.

However, SBC note that MC do not appear to have commissioned any retail impact assessment work related to the possible draw to Medway from other centres. SBC would request that MC consider commissioning this work to support the preferred option and as such our comments should be caveated to the effect that this should be made available for scrutiny so that SBC can be satisfied that the health and vitality of Swale centres are not significantly compromised.

### Environment

SBC welcomes a future update to the 2011 Medway Landscape Character Assessment and that this appears to be scoped in such a way as to inform the use of local landscape designations and countryside gaps. This will be particularly important where options involve rural development at Hoo and/or urban extensions at Capstone and east of Rainham. In this context, MC may also wish to consider landscape capacity evidence to feed into its preferred option choice.

SBC also strongly advocates the use of both local landscape designations to replicate the 'Swale-side' North Kent Marshes Area of High Landscape Value and it's identified locally important countryside gap between Upchurch and the border with Medway Council. The latter designation may also have value on the southern side of the A2 between Rainham and the border.

In the case of options involving growth to the east of Rainham, in addition to those issues already identified, it will also be important to consider the implications of increased recreational pressures on Queendown Warren SAC where diversionary habitat and recreation provision may be appropriate.

In the case of our shared SPA designations, during the course of both the Canterbury and Swale Local Plans it was the view of some parties that a point would be reached where the SAMMs process and the evidence base behind it would need to be reviewed due to increases in housing target across north-Kent since the evidence was first prepared. It may be prudent therefore for a discussion to take place on this via NKEPG at a relatively early stage to confirm the continued robustness of our common evidence.



INVESTORS  
IN PEOPLE



## Transport

SBC welcomes the approach to transport modelling being pursued by MC. The Council is sure that in consultation with the highway authorities, the cumulative impacts of Swale and Medway growth upon J5 and A2/A249 Key Street will be considered.

On a detailed point, SBC would wish to highlight that access to and from the M2 via the Pavilion Services at Farthing Corner is used by significant numbers of local drivers. Whilst this is not a comment about the closure or otherwise of this access, it will be nevertheless important to ensure that this unofficial access to the strategic road network does not skew modelling results.

In terms of public transport, SBC requests that MC consider the relatively poor bus services between Sittingbourne and Medway through the rural areas of east Swale. In the case of rail services, SBC considers that the current parking issues for commuters at Rainham indicate that there may be capacity issues needing to be addressed.

## Air Quality

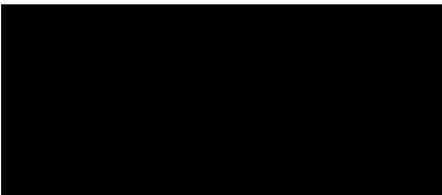
There is no specific reference to the AQMA at Newington and as such this feeds into the assessment of development options. This may be a further area to explore in joint working.

## Health

It is unclear at present whether there are any aspirations for the current Medway Maritime Hospital location, although there is a reference in the consultation material to *'the need to give further consideration to the location of the Medway Maritime Hospital'* (paragraph 9.11). If this were to emerge as a realistic possibility, this would no doubt be a matter for further discussions between our authorities, with SBC potentially supporting an initiative for a relocated hospital site provided that it improved accessibility to Swale residents and emergency services.

SBC trust that the above comments are helpful in terms of moving forward the Local Plan process in Medway and looks forward to engaging in further discussions with you in the coming months. In the meantime, if SBC can be of any further assistance, do not hesitate to contact Gill Harris, the Spatial Planning Manager for Swale.

Yours Sincerely



Gerald Lewin

Cabinet Member for Planning and Deputy Leader of Council

