



# Medway Council Local Plan 2040

## Regulation 18 Consultation- Setting the Direction for Medway

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# **1 INTRODUCTION**

## **1.1 Context**

1.1.1 I am writing on behalf of Gladman Developments to provide our comments on the Medway Local Plan Regulation 18 consultation. Gladman appreciate the opportunity to comment on the most recent regulation 18 consultation and request to be kept updated as the Local Plan progresses.

1.1.2 As you are aware, Gladman are promoting three sites in Medway: Land off Dux Court Road, Hoo St. Werburgh; land off Ratcliffe Highway, Hoo St. Werburgh; and land north of Chattenden. Full site submissions are appended to this letter. Should the Council wish to discuss the sites in the context of the emerging Local Plan, we would welcome the opportunity to work collaboratively with the Council to determine how the sites could help deliver the Local Plan's aspirations.

1.1.3 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the Local Plan preparation process, having made representations on numerous planning documents throughout the UK, alongside participating in many Local Plan and Neighbourhood Plan examinations. It is based on this experience that this representation is made.

1.1.4 The following sections respond to some key issues for the Local Plan that Gladman consider should be addressed to ensure that the policies are robust, and the plan is sound.

## **2 SETTING THE DIRECTION FOR MEDWAY**

### **2.1 Plan Period**

2.1.1 Gladman note that the current LDS intends for the Local Plan to be adopted by 2025. Whilst Gladman support the optimistic timeframes, the plan period should be amended to ensure that it remains in alignment with paragraph 22 of the NPPF. To protect against any slip in the LDS, the plan period should run until 2041 or 2042 to ensure that it has 15 years from adoption on a realistic plan making timescale.

### **2.2 Housing Requirement**

2.2.1 Paragraph 5.12 determines that the housing need for Medway over the plan period 2022-2040 is for 28,339 based on the Standard Method requirement of 1,667 dwellings per annum. However, an annual requirement of 1,667 across the plan period as drafted (18 years) would equate to 30,006.

2.2.2 The document also notes that Gravesham Brough Council have requested Medway assist in the delivery of 2,000 homes and in order to safeguard the delivery of housing, Gladman suggest that a sufficient buffer be included in the housing supply. It is unclear what level of buffer the Council intend to provide, simply stating that 'providing for a buffer to allow for some sites not coming forward for development would lift the total plan period need to over 29,000 homes.' This, at best, is a buffer of 661 homes, a mere 2.3% of the 17 year housing requirement. Whilst there is no rule about what the buffer should be, Gladman in this instance consider a 5% buffer between the housing requirement and supply to safeguard the delivery of housing to be suitable.

2.2.3 Gladman also consider that the windfall buffer detailed in Figure 2 is excessive. Though windfall delivery in the authority has previously been high by virtue of appeals being won in the context of an out-of-date local plan and housing land supply issues, this will be vastly different upon adoption of the Local Plan. With an up to date plan and a sufficient housing land supply, this level of windfall delivery is unlikely to be maintained and will typically only reflect small schemes that come

forward within settlement boundaries or as amendments to currently approved schemes.

- 2.2.4 Therefore, to conclude on the housing requirement, Gladman consider that the housing requirement should be 1,667 per annum between 2020-2041/2, with a 15% buffer and an additional 2,000 homes to support housing delivery in Gravesham. Gladman also wish to seek clarification as to whether Medway Housing and Demographics Report 2021 is intended to form part of the Evidence Base. It is currently not included within it on the website; rather the document is downloaded from a more general 'Planning Policy Downloads' section.

## **2.3 The Spatial Strategy**

- 2.3.1 Gladman welcome the recognition that development in rural areas could have capacity for 14,736 homes. Much of the countryside within Medway is on the Hoo Peninsular and the Council note that the vast majority of sites that have been put forward for potential development beyond the Green Belt are in this location. In general, Gladman support the identification of the Hoo Peninsular as a key location for growth.
- 2.3.2 There is significant potential for the delivery of homes on Hoo. The draft Hoo Development Framework was published for consultation in 2022, and whilst the Housing Infrastructure Fund (HIF) is now absent, the Council must consider how development in this location can be delivered. This will require extensive collaboration and exploration with key stakeholders to ensure that a future growth strategy that directs growth to this location is robust and deliverable.
- 2.3.3 Despite the absence of HIF, there are significant levels of growth that can be delivered on Hoo, including necessary infrastructure and Gladman supports the acknowledgement of the potential for large scale growth on the Hoo peninsula in paragraph 5.40. The Hoo peninsula affords Medway the opportunity for holistic development that can offer a critical mass of development to ensure the plans laudable 'sustainable and green future objective' is achieved. Sustainable

development on the peninsular has the potential to deliver a range of social, economic, and environmental benefits.

**2.3.4** The social benefits arising from residential development are significant; high quality, eco-friendly homes to contribute to the housing needs of the authority and much needed affordable homes. It is well documented that affordable housing is more likely to be delivered on greenfield sites with fewer viability concerns than traditionally experienced on brownfield sites. The urban regeneration strategy may present a range of viability issues typically associated with the complexities of redevelopment that could reduce the level of affordable housing delivered by the schemes. Development on Hoo could ensure the delivery of affordable homes and make a substantial contribution to the affordable housing need of the authority. It is also important to recognise that residential development on Hoo will be delivered beyond the Green Belt, reducing the need to release Green Belt from other areas through the demonstration of exceptional circumstances.

**2.3.5** New housing can also deliver upgrades in terms of social infrastructure, provide a new, expansive area of community parkland, employment space, retail facilities, primary and secondary schools, and healthcare facilities. Comprehensive development can provide new and enhanced leisure and recreation facilities for existing Hoo residents can provide betterment to quality of life on Hoo. New highways infrastructure and road network improvements are a significant benefit of comprehensive development on Hoo, more detail on which is provided later in this response.

**2.3.6** Residential development will also enhance and support the local economy of Hoo by supporting the large scale employment sites at Grain and Kingsnorth. Given that these locations are providing a significant level of economic growth, it is imperative that the workforce expected to be employed at these locations have access to suitable and sustainable homes. The new and existing residents will also make significant contributions to the economy, supporting local shops and services to ensure their continued viability and vitality.

- 2.3.7 Well designed, landscape and climate conscious development will ensure that growth on Hoo can be achieved without significant harm to the environment, and numerous ecological and environmental enhancements can be achieved. New areas of open space, comprehensive landscaping plans, eco-friendly homes and bio-diversity net gain can all be readily achieved on Hoo.
- 2.3.8 Growth in this location could also increase the sustainable travel options in the area, including contributions and support for local services such as a high-quality, high-frequency bus service to support sustainable modes of travel. The delivery of upgrades to service infrastructure such as high-speed broadband and 4G will in turn support businesses and residents in facilitating home-working and reducing commuting. Combined with the delivery of a new local retail centre and improvements to local services, the reliance on the private car could be greatly reduced.
- 2.3.9 Fundamentally, the Council must recognise that the HIF was a growth accelerator that would have delivered the necessary infrastructure, but its absence does not mean that no growth can occur on Hoo. Gladman consider that there is significant levels of growth and associated infrastructure that can be brought forward despite the absence of HIF through comprehensive and well-designed development.
- 2.3.10 Gladman look forward to working collaboratively with Medway to explore the options for the funding and delivery of infrastructure that can support growth on Hoo and bring forward the significant benefits detailed above.

## **2.4 Other Strategic Matters**

- 2.4.1 Gladman consider that Council must properly assess the highways capacity of the district through modelling, modal shift and discussions with site promoters and key stakeholders to find solutions to these constraints which can be funded through Medway wide developer levies.
- 2.4.2 The document makes reference to the Lower Thames Crossing at several points, as well as the issues currently experienced at M2 Junction 1. It is understood that the

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Lower Thames Crossing, as proposed, could exacerbate the issues at J1 and pose a significant roadblock to development on the Hoo Peninsular. However, the Council should be mindful of the significant delays and upcoming review of the Lower Thames Crossing and note that it is not guaranteed to come forward.

### 3 SITE SUBMISSION PROFILES

3.1.1 Gladman are promoting three sites in Medway, all suitably and sustainably located on the Hoo Peninsular. These have previously been submitted through the Call for Sites process, and Gladman have discussed these sites directly with the Council previously, however, should you wish to discuss these sites further please do not hesitate to contact us.

#### 3.2 Land off Chattenden Lane, Chattenden

3.2.1 Land of Chattenden Lane, Chattenden is 35.16 acres and is capable of delivering up to 530 homes alongside land for a primary school, a retail unit, public house, public open space and green infrastructure and sustainable drainage systems. The site is adjacent to the existing residential development of Chattenden, to the west of Peninsular Way, south of Deansgate Ridge Golf Course and the decommissioned Chattenden Barracks. The settlement lies approximately 4km to the north of Chatham, and 3km south east of Cliffe Woods. A site location plan is shown in Figure 1 below.



Figure 1: Site Location Plan, Chattenden Road

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- 3.2.2 The site is a suitable and sustainable location for growth, adjacent to the existing urban area of Chattenden and could also deliver a number of benefits. These include but are not limited to investment in the local community, a significant boost to the supply of much needed market and affordable homes, and new social infrastructure such as land for a school and community uses.
- 3.2.3 The site itself is suitable for development, being well located to existing built form with good access to local services and facilities. The site is well contained within the landscape and other landscape features can be retained and enhanced. Development at this location will not result in an unacceptable impact on highway safety, nor have a severe impact on the operation of the highway network in terms of capacity. No significant impacts on ecological habitats will arise from the development and the site is within Flood Zone 1, at the lowest risk of flooding. There are no designated heritage assets within or immediately adjacent to the site and development at this location would not affect the setting of any locally listed buildings.

### 3.3 Land off Ratcliffe Highway, Hoo St. Werburgh

3.3.1 The site measures circa 12 hectares and is capable of delivering up to 240 homes. It is located adjacent to the existing residential development on the western edge of Hoo St. Werburgh, bound by Ratcliffe Highway to the north and is in an ideal location on the Hoo Peninsular. A site location plan is shown below in Figure 2.



Figure 2: Site Location Plan, Ratcliffe Highway

3.3.2 The site itself is a suitable and sustainable location for development. The site is not subject to any statutory national, or international designations for landscape or nature conservation. A wide range of services and facilities within close proximity to the site include, but are not limited to a primary school, secondary school, sports and leisure facilities, a library, post office, pharmacy, health centre and various eateries. The site is also served by public transport facilities, offering an alternative to the private car. A comprehensive Green Infrastructure framework, public open space and new areas for recreation and play can also be delivered by the site, alongside a sustainable drainage system to cater for the surface water drainage requirements of

the development. These areas will also support ecological enhancement and be design features that benefit biodiversity on site. An Indicative Framework Plan is displayed below.



Figure 3: Indicative Framework Plan, Ratcliffe Highways

### 3.4 Land at Dux Court Road, Hoo St. Werburgh

3.4.1 Land at Dux Court Road measures circa 23 hectares and is a suitable and sustainable location for development. A site location plan is included at Figure 3.



Figure 4: Site Location Plan, Dux Court Road

3.4.2 The site is suitably located near a range of services and facilities, including a primary school, secondary school, medical centre, pharmacy, shops and a post office. There are public transport services available within the vicinity of the site, offering a suitable alternative to the private car. The site is located within Flood Zone 1 and there are no known ecological or heritage constraints to development at this location.

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## **4 CONCLUSIONS**

### **4.1 Summary**

- 4.1.1 Gladman welcomes the opportunity to comment on the issues and options that are currently being explored by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.
- 4.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 4.1.3 We hope you have found these representations informative and useful towards the preparation of the Medway Local Plan.
- 4.1.4 Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at [policy@gladman.co.uk](mailto:policy@gladman.co.uk).

