Medway Council Local Plan

Issues and Options

2012 - 2035



Issues and Options Consultation Document

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Executive Summary

Medway Council is preparing a new Local Plan to set out a strategy for Medway's development up to 2035. This document represents the first formal stage of this process, as a consultation on Issues and Options to be considered in the preparation of the plan. Consultation will take place between 4 January and 29 February 2016.

The document does not set out detailed policies or identify specific sites for development. Rather, it presents key contextual matters that will be the drivers for the new Local Plan. Central to this is the anticipated increase in Medway's population. Latest data released by government indicates that Medway will see a 21.8% increase in its population by 2037, rising to 322,700 people by 2035. Aligned to this population growth is a need for housing, jobs, shops, facilities and infrastructure.

The Issues and Options document sets out the scale of growth anticipated in Medway up to 2035:

Forecasts of Development Needs in Medway			
Housing (number of dwellings) 2012-2035	Objectively Assessed Need	29,463	
Employment	Office	49,943	
(sqm land requirement)	Industrial	155,748	
2012-2035	Warehousing	164,263	
Retail (sqm floorspace requirement)	Convenience	10,500	
2015-2031	Comparison	34,900	

The document raises questions on the most appropriate approaches and locations for supporting sustainable growth in Medway, given the need to protect historic and natural environments and deliver supporting infrastructure. It is structured around the key themes of Housing, Economy, Environment, Natural Resources, Infrastructure and Delivery.

The Issues and Options consultation also invites stakeholders to consider potential approaches that could be taken to a development strategy for the new Local Plan. These include:

- high density town centre and riverside development,
- incremental suburban development,
- planned growth of existing settlements,
- freestanding settlements,
- urban extensions'
- role of custom and self build housing, and
- approaches to the town centres.

Introduction

Medway Council is preparing a new Local Plan to set out a strategy for Medway's development up to 2035.

The Local Plan considers the development needed in the area, and sets out a framework for directing sustainable development. The plan will make allocations for land for development, and include policies to manage development. It must reach a balance between meeting needs for housing and jobs, infrastructure and services, and protecting and enhancing the natural and historic environment. The plan's objectives are to deliver net gains for the area's economy, society and environment.

Once adopted the plan will replace the 'saved' policies in the 2003 Medway Local Plan, the Kent Waste and Minerals Local Plans. It will be used as the basis for making decisions on planning applications.

This Issues and Options consultation document represents the first formal stage in preparing a new Local Plan for Medway. There have been significant changes in Medway since the production of the existing Medway Local Plan and the new plan has to address this change and anticipated needs over the next twenty years. The scale of change and projected growth mean that the new Local Plan must look at new approaches and locations for delivering the housing, jobs and services that the area needs.

This is an early stage in the preparation of the new plan. The council wishes to consult widely to gather further information to help it define the best options for new development locations; the role of our towns, neighbourhoods and villages; looking after the environment and historic features; and securing the infrastructure needed to support growth; and effective policies to deliver quality development in a timely manner.

This document sets out the challenges and issues that the new Local Plan needs to address. Central to this, is the projected increase in population of nearly 50,000 people in Medway by 2035. This growth brings with it a need for nearly 30,000 homes, and supporting infrastructure, services and jobs.

The Local Plan offers an opportunity to shape Medway's growth, directing development to the most sustainable locations, delivering investment to areas that could realise regeneration ambitions, continuing to build Medway's profile as a vibrant and successful place, attractive for its heritage, natural environment and culture.

This document is not a detailed plan, but rather seeks to engage local people, developers, community and interest groups, businesses and statutory organisations, in assessing what are the best choices for a development strategy for Medway over the next 20 years.

It is organised around a series of key themes, setting out key context information and questions that form the basis of this consultation. It also

considers the components to be considered in developing a vision for the new Local Plan, and the approaches that could be taken to allocating development, so that growth provides the best outcomes for Medway.

In the National Planning Policy Framework, 2012, the Government stated its preference for local planning authorities to produce a single Local Plan document, bringing together strategic policies, with land allocations and detailed design and development management policies. As a unitary authority, Medway Council also has responsibility for minerals and waste planning, and these areas will be included in the scope of the new Local Plan.

This is the initial stage of the formal plan preparation process. Following the analysis of the responses received to this Issues and Options consultation, the council will prepare a draft plan setting out preferred options for development, and supporting policies and carry out a next round of consultation. After determining the most sustainable option for a development strategy, the council will publish a draft plan for consultation, and amend the document as needed following the responses to the consultation to produce a final draft of the Local Plan to be submitted to the Planning Inspectorate for independent examination.

How to respond to the consultation

This consultation is the first formal stage in the preparation of a new Local Plan for Medway. The council is keen to hear from residents, businesses, organisations, community and interest groups to help inform the plan.

The consultation period runs from Monday 4 January 2016 to Monday 29 February 2016. During this time, the council will be holding events and exhibitions to discuss the Local Plan. You can find out more about these events on the council's website at: www.medway.gov.uk/planningpolicy

Comments must be received by 5pm on Monday 29 February 2016.

You can submit comments in the following ways:

By post:

Planning Policy Regeneration, Community & Culture Medway Council, Gun Wharf Dock Road, Chatham, Kent ME4 4TR

By email:

Planning.policy@medway.gov.uk

Copies of this consultation document are available to view at public libraries across Medway, at the reception desk at the council offices at Gun Wharf, during opening hours, and online at: www.medway.gov.uk/planningpolicy.

You can find details of the opening hours of the council offices and libraries at: www.medway.gov.uk or by telephoning 01634 333333.

This information can be made available in other formats from 01634 333333 If you have any questions about this leaflet and you want to speak to someone in your own language please ring 01634 335577

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ગુજરાતી	331782	Polski	332373	اردو	331785	Lietuviškai	332372

Following the end of the consultation, the council will collate and consider all responses received. The findings of the consultation will be published, together with the council's response. The information gathered through the consultation process will be used in developing a draft version of the new Local Plan.

Context

Medway is made up of a large urban area built up between the river and the downs in north Kent, and an extensive rural area to the north on the Hoo Peninsula. It is distinctive for its five historic towns, its waterfront regeneration, and its dramatic landscapes, with juxtapositions of the natural environment with modern infrastructure and commercial life.

Medway is a dynamic place, seeing 3.4% growth in its population in the last 3 years. Over this time, there has been rapid expansion of the Universities at Medway, new communities and developments rising up on the waterfront, the introduction of HS1 rail services through the urban area, and successful business growth and development of creative industries. This growth has been taking place within the context of a rich cultural and natural heritage.

The new Local Plan needs to respond to the changes seen in Medway over recent years, and to anticipate new opportunities and growth, so that development is best placed to capitalise on benefits to the area, and those aspects of Medway that are most valued are safeguarded into the future.

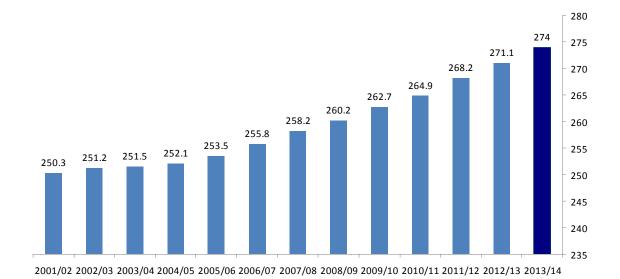
Medway sits within the Thames Gateway, which continues to be seen as a focus for regeneration and economic growth. Proposals for further strategic infrastructure and development, such as a new Lower Thames Crossing, the Ebbsfleet Garden City, and the proposed London Paramount resort all have a potential bearing on Medway.

Despite the investment seen in Medway over the last decade, significant areas of disadvantage and inequalities remain across Medway. Much of the deprivation is concentrated in central urban areas around Chatham and Gillingham. Data collated in the 2015 Index of Multiple Deprivation (IMD) indicate a relative worsening of conditions in some areas compared to neighbourhoods¹ nationally, and around particular themes. Some deprivation themes are of specific concern, such as the relatively high crime levels, child poverty, low educational and skills achievement rates and income levels.

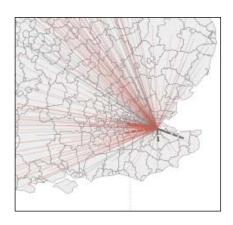
Medway's population was 274,015 in the 2014 Mid Year Estimate² and it has been growing at a significant rate with relatively large annual increases in the last three years. Growth levels have been above those seen nationally.

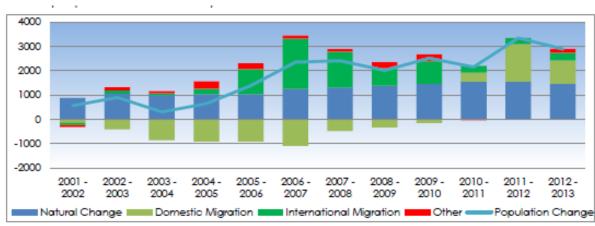
¹ The IMD is reported by Lower Super Output Area. This is a statistical area with a population between 1,000 and 3,000 people and between 400 and 1,200 households, and so is taken here to be equivalent to a neighbourhood.

² Available at: http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-368259

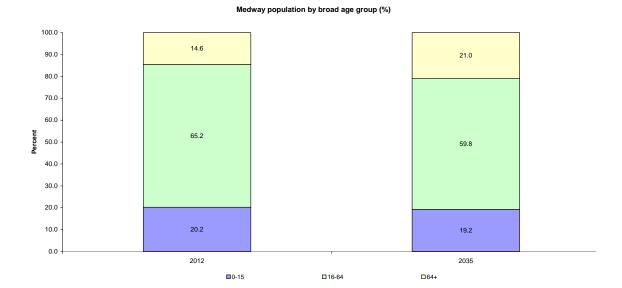


Medway's growth is primarily down to natural growth – births exceeding deaths, but inward migration, particularly from neighbouring areas and South East London has also been increasing recently.





Medway's population is predicted to grow by just over one fifth over the next twenty years. This is above the national level of growth, but in line with trends seen across Kent. The largest growth will be in the over 65's – with growth in this age group accounting for more than half of the overall population growth in Medway.



Medway is also becoming a more diverse place, with an increase in its black and ethnic minorities population from 5.4% in 2001 to 10.4% in 2011.

Developing a vision for Medway in 2035

The Local Plan needs to clearly set out a vision for the type of place Medway should be in 2035. The decisions on the use of land in Medway, and the policies in the plan must seek to achieve the aspirations of this vision.

In developing the Local Plan, the council wishes to engage the wider community in establishing this vision, so that the planning strategy encompasses shared ambitions for Medway.

The vision must respond to the key issues and opportunities that Medway faces over the next twenty years. These include:

- Accommodating the projected growth of an 20% increase in Medway's population, and its changing demographics
- Realising opportunities to drive economic success and addressing inequalities across Medway
- Developing a modern Medway, delivering quality through regeneration and investment, whilst protecting the best of its past and its natural environment

The purpose of the Local Plan is to guide the future development of Medway, for it to be an economically successful, attractive and vibrant place where people want to be.

QUESTION

1) What do you think should be the key components of and ambitions for the Local Plan's vision for Medway in 2035?

Strategic Issues

Medway cannot prepare its Local Plan in isolation, but must consider the wider context, to ensure that its policies align with strategic plans and are coordinated with those of neighbouring areas. Medway's location in the Thames Gateway growth area presents a number of strategic development issues. Ambitions are promoted through the South East Local Enterprise Partnership (LEP) for the area's regeneration to deliver new homes and jobs in a high quality environment supported by excellent infrastructure. Medway is engaged in this strategic development work through the LEP, and the Thames Gateway Kent Partnership at a north Kent level. In addition to existing investments and regeneration plans, such as HS1 and Ebbsfleet Garden City, the area continues to be the focus of additional strategic developments, such as capacity for a Lower Thames Crossing and London Paramount resort. Radical proposals to develop a new international London airport in the Thames Estuary have not been supported by the Airports Commission.

The proximity to London is a key consideration for Medway, with commuting and access to markets being of particular importance to the area's economy, and a trend for people to move to the area from the southeastern London boroughs. The projected growth of London may have implications for Medway, in common with other parts of the South East, for example, housing demand, business opportunities, and waste management.

Although Medway has a large employment base, there are significant movements of workers into and out of the borough for work. There is net outcommuting to areas such as Maidstone, Tonbridge and Malling, and London.

Work carried out to define Medway's housing market area has shown a complex set of relationships with surrounding boroughs. Two-thirds of house moves in Medway are from existing residents. Apart from the influence of the London housing market, people moving into the area generally come from places close by, such as parts of Gravesham, Swale and Maidstone. Similarly people moving out of Medway tend to look to neighbouring areas, such as Swale, Maidstone and Tonbridge and Malling.

Bluewater has a sub-regional shopping role, and has a major impact on retail patterns across the area, drawing 26% of all comparison spend from Medway. Further expansion of the leisure offer at Bluewater could have further implications for Medway's town centres.

As a major urban area, Medway delivers a range of services which may cater for a wider population; e.g., Medway Maritime Hospital provides services for people living in Swale.

The Thames Estuary is a major landscape feature. The council recognises the importance of working at a landscape scale when planning for the natural environment. It works with the Kent and Thames Gateway Nature Partnerships. This collaborative working established a Nature Improvement Area that included investments in habitats on the Hoo Peninsula, and seeks to

deliver the targets of the Kent Biodiversity Strategy through cross boundary biodiversity opportunity areas in the marshes and downs. The North Kent Environmental Planning Group has developed a strategic access mitigation and management strategy to address the potential of recreational disturbance to the special features of the Thames, Medway and Swale Special Protection Areas and Ramsar sites. The Thames Estuary 2100 Plan provides a framework for tidal flood risk management in Medway, and the proposals will be built into the Local Plan to ensure safeguarding of land and policy development. The council also works for the conservation and enhancement of the Kent Downs Area of Outstanding Natural Beauty through its management plan and role in the Joint Advisory Board.

Minerals and waste issues often affect a wider area, and the council participates in regional working groups to share information and coordinate planning.

The council is engaged in ongoing work with neighbouring planning authorities and statutory organisations on cross boundary matters. The Duty to Cooperate has been built into the process of preparing a new Local Plan for Medway, sharing information, and holding early discussions on emerging issues.

The council will seek broad and meaningful input to the consultation process on the Issues and Options report to ensure that strategic issues are effectively addressed in the preparation of the new Local Plan.

QUESTIONS

- 2) What do you think are the strategic issues that the Local Plan needs to address?
- 3) How should the council respond to these issues?

Housing

The delivery of land for housing is central to the purpose of the new Local Plan. Medway's growing population needs housing. There are already pressures on the housing market, with rising costs creating difficulties for many households finding somewhere to live.

Medway's housing market has also seen significant changes in recent years. In response to this, Medway Council's housing strategy for 2015-18 sets out four strategic priorities:

- Increase the supply of suitable and affordable homes
- Improve the quality of homes, environment and people's lives
- Promote sustainability by supporting people within their community
- Improve the flexibility of accommodation

There have been significant changes in recent years to the legislative context affecting housing, and further changes are anticipated through the Housing and Planning Bill. Social housing and welfare reforms have had impacts on the housing sector, and there are continuing issues of affordability.

Government proposes to introduce permission in principle for housing development on brownfield sites, boost the supply of starter homes, and promote custom and self build as housing options. Further reforms to social housing will also have implications for Medway. At this stage the specifics of many of these initiatives are not yet fully understood. As legislation emerges and developers respond to new opportunities, more updated information will be fed into the preparation of the new Local Plan.

One of the most noticeable changes in Medway's housing market has been a significant increase in the size of the private rented sector, rising from 9,350 households in 2001 to 18,150 in 2011, a near doubling of the proportion of households in this tenure. This rise in private rented accommodation has been matched by a decrease in households who own their home with a mortgage. Part of this change is related to the growth of the Universities at Medway, with an increased student population seeking rented housing. However, of more significance is the wider national trend for increased use of the private rented sector, aligned to the affordability of home ownership. There is a lower supply of social housing in Medway than found in most comparator authorities.

The 2011 Census identified 106,209 households and 110,107 household spaces in Medway, an increase of 6% in households and 7% in household spaces. House prices have been rising, but they remain under the average when compared with neighbouring boroughs.

Determining housing need

In looking forward over the plan period, the council needs to ensure sufficient land is available to provide for housing the area's communities. The plan

needs to consider not just the amount of housing needed, but also the size and mix of housing types to meet the needs of different sized households, and those with particular needs, such as older people, people with disabilities, and students.

The Government requires Local Planning Authorities to determine the objectively assessed needs (OAN) for housing in their strategic housing market areas. Work carried out for the North Kent Strategic Housing and Economic Needs Assessment (SHENA) in 2015 has analysed demographic, economic and market signal information to assess the quantity and types of housing that will be needed to meet the projected growth in households over the plan period. A extract of the SHENA providing the OAN analysis is set out in Appendix i. This concludes that the OAN for housing in Medway is between 1213 and 1281 dwellings per annum over the plan period. This means that the Local Plan needs to make provision for up to 29,463 new homes by 2035.

In line with Government requirements, the SHENA has considered the definition of Medway's housing market. Initial work indicates that around two thirds of house moves are from people moving within Medway, and that the local property market has characteristics that distinguish it from surrounding areas. However it has also shown that Medway has complex relationships with a number of neighbouring boroughs, and these could be seen as the basis for a housing market area extending outside of the Medway area.

In preparing the new Local Plan, the council is committed to planning positively to meet the development needs of its area, subject to ensuring that in doing so, development would not conflict with the principles of sustainable development set out in the NPPF. Therefore the council is embarking on the plan preparation process with the intention of meeting the objectively assessed needs identified for Medway's administrative area.

It is recognised that the cost of housing is unaffordable for many people. The council needs to consider the need for 'affordable housing', and make appropriate provision in its housing policies. Medway represents a relatively affordable property market compared to many surrounding areas which can make it attractive to people living in other areas. However with lower earnings in Medway, a considerable proportion of Medway residents struggle to meet the cost of housing. For many, particularly young people, owning a property is well beyond their financial means.

The Strategic Housing Market Assessment (SHMA) carried out in 2015 for Medway identified a high level of demand for affordable housing, at 17,112 over the plan period. The Local Plan needs to be deliverable, and must demonstrate that the policies are viable. Initial analysis indicates that a percentage of 25% affordable housing would be deliverable on developments of over 15 units, taking into account land values and development costs. Further work is being undertaken to assess whether smaller developments would also be able to support delivery of affordable housing.

Housing needs of specific groups

The SHMA has considered the needs of different sections of the community for housing. A summary of key findings for the following groups are set out in Appendix ii:

- Older person households
- Groups with specific support needs
- Younger person households
- BME (non-white) groups
- Rural households

Some of these specific needs are considered further below.

Medway's population is ageing. Between 2001 and 2011, there was a 17% increase in the number of people aged 65+. Population projections indicate that this proportion will continue to grow, with forecasts of a 55% rise from 40,500 in 2013 to 67,800 in 2035. With an ageing population comes a greater propensity to health impairments. Incidences of mobility impairments, dementia and other limiting health conditions increase significantly:

Projected population aged 65+ with health issues ³					
Health condition type	2015	2020	2025	2030	% change 2015-2030
A 11 141 1	0 =00	44.000	40.004	11001	
A limiting long term	9,793	11.069	12,924	14,894	+52.1
illness – day to day					
activities limited a lot					
Dementia	2,692	3,130	3,759	4,501	+67.2
Learning disability	887	995	1,114	1,275	+43.7
Admitted to hospital as	832	964	1158	1312	+57.7
result of a fall					

Alongside this, there may be family members who take on the role of full time carers, often with implications for their own health and lifestyles. A proportion of people will need more targeted care, through residential or nursing homes.

People with learning and physical disabilities may also have specific requirements for housing, which may need to be delivered through adaptable or purpose built stock.

Medway's black and minority ethnic communities make up 10% of its population. BME households can often be larger in size, contain more children, and have a greater tendency towards accommodating multiple generations than the Medway average.

Starter Homes

In order to help address the difficulties in accessing the housing market, the Government intends that Local Planning Authorities should promote the

³ Source: POPPI. Crown copyright 2014. Figures may not sum due to rounding

supply of starter homes, provided at a 20% discount from market prices. Details of the scheme are not yet confirmed, but it is anticipated there will be a need to look widely at opportunities to deliver starter homes in the local area. To achieve the discount on market prices, the Government intends to relax the infrastructure requirements asked of developers. This may bring forward much needed housing, but there is a risk of sites being developed without the range of services and infrastructure that residents expect. Greater pressures may therefore be placed on existing services.

The Government is seeking to make the best use of brownfield land for development of housing. Medway has a well-established regeneration agenda, bringing forward brownfield sites to provide land for new homes and jobs. Many of these sites are already identified in the Strategic Land Availability Assessment (SLAA) as potentially suitable for development, and some, such as Rochester Riverside and Strood Riverside benefit from existing masterplans, development briefs and in some cases planning permission. The Council may need to consider further sites to meet the Government's expectations for housing development on brownfield sites.

Self Build and Custom Build Homes

The Government is keen to offer greater housing choice, and particularly to support those looking to build their own home. There is an existing pattern of small builders developing single or small housing schemes in Medway, but little information about the scale or nature of this demand. The Council will be required to maintain a register of people interested in finding land for self build housing, and make provision for this specific housing need in the Local Plan. As with starter homes, the Government intends that self and custom build homes will be exempted from many infrastructure requirements.

As this is a recent initiative, further work will be needed over the plan preparation period to assess and respond to the need for this type of housing.

Student housing

Medway's student population has grown with the development of the higher and further education offer, notably at Chatham Maritime. The expansion of the Universities at Medway saw increased demand for private rented sector housing, particularly in Gillingham. More recently, purpose built student accommodation has been provided. Work is being carried out to provide more detail of the extent of student households across Medway, the level of demand for accommodation, and the impact on the private rented sector.

The Local Plan will consider the need for student accommodation, and also the opportunities that new developments could offer.

Gypsy and Traveller accommodation

Medway has a Council-run traveller site at Cuxton, accommodating 11 households and a travelling showpeople's site in Strood. The remainder of the

provision is made up of small, privately owned sites, generally in rural and rural fringe locations on the Hoo Peninsula and south of Rainham.

An assessment of gypsy and traveller accommodation needs in Medway was carried out in 2013, and identified a need for 22 extra pitches by 2028. However updated Government policy issued in 2015 changed the definition of gypsies and travellers, with more specific requirements on demonstrating the nomadic aspect of their lifestyles. The full implications of this change in Government policy have yet to be assessed. The level and type of need identified in the 2013 assessment may need to be reviewed.

QUESTIONS

- 4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?
- 5) What do you consider to be the appropriate housing market area for Medway?
- 6) Do you agree that 25% is an appropriate level for the requirement of affordable housing, and what threshold should be set for the scale of development that needs to provide affordable housing?
- 7) What form of housing best meets the needs of Medway's growing population of older people?
- 8) What housing is needed for other specific groups in Medway?
- 9) How can development make a positive contribution to the health and wellbeing of Medway's communities?
- 10) Do you have suggestions for potential sites for starter home developments?
- 11) How do you consider the infrastructure needs of starter home and self and custom build developments should be addressed?
- 12) How should the council provide for the demand for land for self and custom build housing? For example, integrated with larger developments, on standalone sites, or linked to placemaking ambitions to deliver highly sustainable and innovative design quality.
- 13) What is the demand for student housing and where would this be best located? For example, would dedicated student housing be appropriate in Medway's town centres?
- 14) What is the level and type of need for gypsy, traveller and travelling showpeople's accommodation in Medway, and what criteria should be used to identify appropriate sites?

Economy

Medway is a major economic hub within the South East region and has seen significant shifts in its economic base in recent years. Some traditional manufacturing and port activities have been lost, but a number of advanced manufacturing activities have remained and expanded. The area has also attracted a range of 'new' sectors, from financial and business services to software and gaming development. The innovation seen in responding to economic restructuring is a key component of business in Medway.

There has been a major expansion of higher and further education in Medway. A 'learning quarter' has been established in Chatham Maritime, with the Universities at Medway, Mid Kent College and the University Technical College all located here. This unique offer presents great opportunities to raise skills levels and enable further economic development based on a knowledge economy, providing for higher value employment that could drive the success of the area.

Medway's location within the Thames Gateway offers excellent opportunities to capitalise on regeneration and other investment, and to stimulate business growth, benefitting from connectivity through the motorway and rail networks to the wider economy. It is well placed to accommodate businesses seeking to relocate from London. The area's strengths include its established distribution routes; defined logistics and manufacturing locations; and proximity to the large markets in London and the South East.

However there remain challenges in the local economy, with productivity below the average for Kent and the South East, and skills levels also lagging behind competing areas nearby. The local economy has a focus on lower value activities, which is a weak foundation for economic growth. Although improvements have been achieved in recent years, the unemployment rate remains above the sub-regional average. There are a relatively low number of the largest employers, and historically low rates of business start up and survival rates. The area has experienced a decline in commercial property supply as a result of landowner aspirations for residential development.

As typical of many areas within proximity to London, there is an outward flow of workers to the capital, but also to local employment centres in Kent.

Medway's economic profile

In 2011, Medway had a working population of 126,689, and 82,800 jobs in the local economy. The area's employment profile shares characteristics of neighbouring areas, but the economy has some specialisms in manufacturing and advanced engineering. Finance and IT businesses are underrepresented, compared to regional levels. Ports, wharves and energy infrastructure have been built up around the river and estuary. Some of these installations and industries are of strategic importance.

Medway's economy runs at just over two thirds of the national level in terms of output. It is among the lowest performing local authorities in the South East, lagging behind Kent and England averages for Gross Valued Added output (GVA), and with a much slower rate of growth than seen in neighbouring authorities and wider context areas. Medway saw a steep decline in 2008, and has been slow to recover post recession, with GVA output not yet back to pre-recessionary levels. Between 2001 and 2014, overall GVA growth in Medway was 5%, compared to 14% across Kent.

GVA per head (2013)				
Medway	Kent	England		
£15,414	£19,835	£24,091		

A number of factors contribute to this relatively poor economic performance, including significant out-commuting, an economy characterised by lower value activities with an absence of some higher value sectors, and a lower skilled local workforce.

Medway has tended to have a lower employment rate than nationally. There are also fewer jobs per resident worker, a sign of a weaker economy and a shortage in local labour demand. This results in a strong out-commuting flow. More recently, the employment rate has increased significantly, with the gap between Medway and the national rate narrowing. However, among the economically inactive the number of people who are classified as long-term sick remains high.

70% of people who work in Medway live within Medway. However, only 51% of Medway's economically active residents work in the area, reflecting the high levels of out-commuting. Data from the 2011 census shows that 50,749 people left Medway for work, while 22,700 workers travelled into Medway. The strongest commuting links are with Maidstone, Swale, and Tonbridge and Malling.

The skills profile of the area is critical in attracting and supporting economic growth, with businesses seeking locations with an available pool of suitably skilled labour. Medway compares poorly with neighbouring areas in the skills levels of its workforce. 19% have achieved the highest level of qualifications, compared to a Kent average of 25%, 26% in Maidstone, and 27% in Tonbridge and Malling. Just under a quarter of adults have no qualifications. This proportion rises significantly in some of Medway's neighbourhoods.

Employment land

The council has commissioned research through the North Kent SHENA to assess how existing employment sites meet business needs, and the quantity and attributes of land and buildings needed to meet emerging employment needs over the plan period.

This shows that Medway has a wide ranging employment land portfolio, with sites in various locations from historic town centres, riverside locations with

wharfs, out-of-town purpose-built Business Parks, and freestanding semi-rural sites, which tend to be a focus for heavy industries. This diverse portfolio of land can host a range of business operations and presents a significant opportunity. Vacant and available floorspace has fallen in recent years, and occupancy rates have risen. Two thirds of the existing floorspace is concentrated in Medway City Estate, Gillingham Business Park, and Strood. The existing employment land portfolio is summarised below:

- Chatham town centre and Maritime provide a range of employment space, with traditional dockyards, old and new office stock (the latter mainly concentrated at Chatham Maritime), and light industrial and warehousing activity. This portfolio provides a base for a wide range of business activities including financial services, ICT, manufacturing and engineering. Employment uses at the Historic Dockyard are integrated into a high quality environment which also includes tourism, residential and leisure uses.
- Medway City Estate is a strong cluster for industrial and light industrial
 use, and also provides some good quality office stock. However it has
 poor quality public realm in parts, resulting from its fragmented land
 ownership, which appears to have a negative impact on the value of
 stock and nature of businesses locating here.
- Gillingham Business Park offers a higher quality environment for businesses with a good quality office and light-industrial stock, catering for both for SME and large operators. It is in single ownership and has a consistent, good quality and well-maintained public realm. This has positive impacts on the value of the stock and nature of businesses.
- Medway Innovation Centre and the Compass Centre (within the
 Universities at Medway campus) provide a specialist offer for micro and
 SME businesses, a critical component of Medway's economy. The
 Innovation Centre is in a prime location at Rochester Airport and has
 been particularly successful in attracting high value activities. These
 locations have seen increasing occupancy levels and interest from
 businesses and both could provide a source of growing businesses to
 support ongoing economic growth throughout the plan period.
- Strood has a collection of industrial estates, including around the
 Temple Waterfront area, which have grown organically over a period
 of time. Similar sites exist in parts of the other towns, though not in
 such concentration. They comprise a mix of small estates alongside
 larger occupiers, and are important generators of local employment.
- **Kingsnorth and Isle of Grain**, on the Hoo Peninsula, offer significant space for heavy industries, large-scale distribution and businesses reliant on wharfage. Both have significant potential for intensification and expansion in addition to their existing supply, with capacity to accommodate land-intensive and heavy industry uses that are less likely to be based in urban or urban fringe locations.

Of these areas, the key office locations are at Chatham Maritime, Gillingham Business Park and Medway City Estate. The office market in Medway is relatively weak, and a shortage of good quality stock has ben identified as a major barrier to growth and investment.

Medway also has a number of opportunity sites that can host a variety of employment types. There are regeneration and masterplanning initiatives focussed around Chatham and Rochester Airfield, both with capacity to create attractive offers for high quality office, light industrial and advanced manufacturing uses.

Supply Summary

Medway's total employment land supply is summarised in the table below.

Summary of employment land supply in Medway⁴				
	Area (ha)	Total No of Sites		
Existing Sites	923	40		
Existing Sites - Vacant Land	31 to 32	7		
Proposed Sites- Vacant Land	450	6		
All Sites 1,370 ha				

Whilst the portfolio is generally good, the legacy of historic 'heavy industry' lingers in many locations, with the quality of the environment affecting the ability of some sites to attract new occupiers. Despite significant investment in place-making and promotion, external perception of Medway's employment offer has been slow to change, although a range of higher profile knowledge based activities are beginning to shift this.

Issues

A key issue for the Local Plan will be to secure a successful economic base in Medway, providing a range of jobs for residents and securing sustainable growth without exacerbating the need to travel to access high quality job opportunities. This means providing attractive, available employment land in the right locations and of appropriate formats, offering flexibility to enable buildings and sites to deliver a mix of office, industrial and storage space to meet changing occupier needs. Other policies may also be required to support the conditions to boost productivity and drive up economic value.

To forecast the scale and nature of economic growth anticipated in Medway over the plan period, calculations have been carried out based on an assessment of the population growth projections, the strengths of the local economy, knowledge of growth sectors, and impacts of major strategic developments such as London Paramount. The research has forecast a growth of around 17,200 new jobs in Medway up to 2037. Over half of these jobs are expected in non-B class activities, such as retail and healthcare.

Although there is a considerable supply of vacant land identified for future employment use, the majority of this is in a small number of locations with a

⁴ North Kent SHENA

very similar scale and character. As such, it is questionable whether the nature of this supply will be able to cater for all future requirements. The SHENA research has identified a need for the following quantities of B class employment land over the plan period:

Medway Employment Land Requirements 2012-2035 (sqm)			
Office	49,943		
Industrial	155,748		
Warehousing	164,263		

There is a particular misalignment between office stock and demand. Most of the good quality stock is contained within large floorplate buildings, while the make-up of the local economy and shifts in occupier demand in recent years suggests there is likely to be limited future demand from large office occupiers locating in Medway. However, these larger floorplates are often difficult or expensive to convert into smaller units. This can limit landowner willingness to adapt buildings to meet SME needs, in turn limiting the capacity of the area to accommodate future demand in a sector of high growth potential.

Attractiveness to SMEs may also be limited by the availability of high bandwidth internet connectivity within many business locations, and the inflexibility of lease arrangements on some properties.

The large sites on the Hoo Peninsula are well positioned to compete within the regional market for large scale industrial and distribution activity, but are unlikely to be appropriate locations for office based or SME activity. There is a growing trend for creative and office based businesses to locate closer to town centres and the range of amenities they provide. Therefore, there is likely to be a qualitative need to provide new capacity for these activities as part of mixed-use proposals around the main urban centres. There is already a cluster of creative activity growing around Chatham and Rochester High Streets; provision of new space linked to this could provide an opportunity to lead regeneration in some secondary locations and add to the vibrancy and success of the town centre.

Another key consideration will be the ability to deliver space and communications infrastructure to reflect the needs of the new 'tech' and 'creative' activities coming forward. Often, these businesses do not require space that neatly falls into individual use classes, instead requiring hybrid spaces providing a mix of office, workshop and some storage/distribution space, across a range of scales.

Rochester Airport is identified as a key location to expand high value businesses in Medway. There are also opportunities to establish new offers, for example, through the strategic development the subject of the current planning application at Lodge Hill.

A further issue that will need to be taken into account when determining where and how to plan for economic growth relates to potential competition

for available land from other uses, particularly residential which tends to generate higher land values. It is noted in this respect that in order to boost the supply of housing, the Government is relaxing the planning controls safeguarding employment land, making it easier to convert commercial premises to residential uses and encouraging consideration of derelict or unused employment sites for housing development and considered a "permission in principle" for housing development on some brownfield land. This may have the potential risk of losing employment land and reducing the ability of businesses to locate or expand in Medway.

QUESTIONS

- 15) Where should such sites be located, considering opportunities in existing employment areas, and potential new sites such as Lodge Hill or other developments?
- 16) What are the opportunities for further business growth in and close to town centres in Medway?
- 17) Do you agree with scale of jobs and employment land needs identified for Medway over the plan period?
- 18) How can Medway realise opportunities to capitalise on growth in the wider area, including London?
- 19) How should the plan respond to opportunities arising from the expansion of higher and further education in Medway?
- 20) Is it feasible to reduce the amount of out-commuting from Medway, and what would be required to achieve this?
- 21) How should the plan address the specific locational requirements of some businesses, for example access to wharves?

Tourism

Tourism plays an important role in Medway's economy and culture. Much of the activity is focused on the area's rich heritage, notably Rochester and the Historic Dockyard at Chatham, and an extensive offer of festivals, events and concerts. Medway is particularly known for its military heritage, visible in the castles at Rochester and Upnor, forts and defences, the Chatham Historic Dockyard, Royal Engineers museum and Naval memorial. There are also cultural connections with Charles Dickens, extending from historic Rochester to the atmospheric marshes of the Hoo Peninsula.

However, Medway is a growing modern city, with a large student population and close connections to London, and its offer to visitors is broadening, as demonstrated in the development of new art galleries, venues and cafes. The Historic Dockyard is increasingly known as the backdrop for many films and primetime TV dramas.

The rural areas of Medway offer great opportunities for walking, cycling, bird watching, fishing and watersports. The RSPB has major reserves on the Hoo Peninsula at Cliffe and High Halstow, offering views of birdlife over the marshes.

Research in support of the preparation of a Destination Management Plan for Medway has indicated that tourism generated nearly £300m of value to Medway in 2012, from over 4 million trips, providing over 4000 FTE jobs and making up 7% of the area's employment. Day trips form the majority of visits, estimated at 3,640,000 in 2012, compared to 537,000 staying visitor trips.

The development of new hotels at Chatham Maritime, Victory Pier and Medway Valley Park has boosted the supply of accommodation in recent years. Further provision is planned in Rochester. Allhallows on the Hoo Peninsula has a large holiday caravan park, attracting people from both the UK and overseas, and the operator is keen to expand and improve the facilities. River based tourism also sees visitors using Medway's marinas for overnight stays.

Issues

Medway is often seen as a daytrip destination, centred on the well-known heritage attractions of Rochester and the Historic Dockyard. Increasing the length of visits to the area would provide the basis for securing additional spend in the local economy, in accommodation, food and drink and shopping, and allow visitors to explore beyond the main attractions. Opportunities have been identified to extend the visitor accommodation offer, such as through a 'boutique' hotel in Rochester and rural B&Bs, self catering and camping in Medway's countryside.

The proposal for a major entertainment resort on the Swanscombe Peninsula (London Paramount) could offer new opportunities for tourism in Medway. Construction activity could create an increased demand for bedspace for site workers, and in the longer term it is anticipated that although the scheme

includes its own hotel developments, some visitors would choose to stay outside the resort. Medway would be well placed to offer accommodation to both workers and visitors. Capturing some of the visitors' time and spend in Medway could provide a significant boost to the local area.

Knowledge of Medway's countryside is often limited and potentially overlooked in favour of other parts of Kent. As a result of this, there has been little investment in visitor facilities and services.

The River Medway is a key defining characteristic of the area, but is often underplayed in the visitor experience. Given that much of the ongoing regeneration focus is on waterfront sites, there is an opportunity to plan connectivity to the river and its estuary from and between existing tourist assets.

QUESTIONS

- 22) What scale and form of additional visitor accommodation is needed to support and develop a successful tourism sector in Medway?
- 23) What are the opportunities for extending tourism in Medway beyond day trips to the main attractions and events?
- 24) What role does the river and Medway's countryside have to play in developing tourism locally?

Retail, commercial leisure & town centres

National trends

Following the economic crisis and recession, the market is now improving, with increases in consumer spending. Expansion is likely to be at a slower pace than previously, and there are still some drags on growth, but retail centres can expect to benefit from the upturn in the wider market economy.

National retailers no longer require stores in every town to achieve coverage, due to the growth of internet shopping. This is part of a trend towards "polarisation" of retailing, with flagship stores in dominant centres and satellite stores in other locations. Value-oriented retailers such as Primark, Wilko and Poundland tend to be reluctant to pay the high rentals associated with flagship retail locations and become concentrated in lower order, small and medium-sized centres, often in prime retail pitch. In the face of this polarisation (and competition from online retail), centres with a unique or specialist retail offer tend to be stronger performers.

Online shopping is an important part of modern retail business, but can be an opportunity as well as a threat to town centres. Many retailers need a local presence to enable click-and-collect operations. This is one of the most significant drivers of growth in online and multi-channel shopping, as retailers continue to experiment with new forms, such as partnerships where online-only retailers offer click-and-collect in local stores. In some circumstances, click-and-collect can drive footfall to town centres in its own right.

Diversification of town centres into locations for more than just retail is an emerging trend, which is expected to be important for their continued success. This would include provision of community facilities, leisure and food and drink uses. Heritage assets and tourism can also be an important draw.

In terms of convenience retail (groceries etc.), the big four supermarkets have significantly reduced expansion and have been closing under-performing stores. Investment in new stores is likely to be less frequent, with operators being more selective about which sites to bring forward. This may result in a programme of improvements and upgrades to existing stores, but it is too early to be certain about what this may involve. Discount supermarkets are continuing to expand, with larger footprints and improving market share.

Out-of-town retailing is the only sector where store numbers have been consistently increasing over the last 15 years. Retailers traditionally found in High Streets have been moving into out-of-town retail parks. Key draws are likely to be the availability of larger, modern floorspace and free parking. There is also a trend for diversification of retail parks to include supporting uses such as food and drink and leisure, to increase dwell time. This could increase the competition between such locations and town centres.

The leisure sector has generally performed well despite the downturn, albeit with individual casualties amongst both independent and multiple brands.

Restaurants, coffee shops and health and fitness uses have all seen expansion. For health and fitness in particular this has been focussed on the more value-oriented end of the market. Pubs are an exception to the generally good health of the leisure sector, with high numbers of closures. Empty units are often converted to other uses such as small-format convenience stores.

Current position of Medway centres

Chatham is Medway's highest-order centre, but is under-performing against what could be expected for a centre of this size and type. It draws a relatively low proportion of the available spending power from its local catchment, losing out to centres such as Bluewater, Maidstone and Hempstead Valley. It has particularly low provision of leisure uses including food and drink outlets. This represents a missed opportunity to improve vitality and viability by increasing dwell time and footfall. Chatham also currently lacks a street market.

Chatham's vacancy rate is the highest in Medway, and worryingly seems to be rising, against the national trend. This includes a few large & prominent sites such as the former Tesco store on the Brook, and a significant number of units within the Pentagon shopping centre, particularly on the first floor. Since the closure of Tesco, Chatham's convenience offer is limited; a number of independent retailers towards the eastern end of the High Street are performing well, but the remaining supermarkets (Iceland and a small Sainsburys in the Pentagon) do not support much more than top-up shopping. There are indications that the type of units available do not meet the needs of many modern retailers, for example being too small and inflexible.

Recent improvements such as the new bus station and public realm works are a step in the right direction, but significant investment and improvement is necessary if Chatham is to consolidate or improve its market position.

The other centres in Medway are broadly performing as could be expected, serving more local markets. With the exception of Rochester, the leisure offer of the town centres (including food and drink uses) is fairly poor. They would also benefit from investment, particularly in environmental improvements:

- **Gillingham** does not have good provision for convenience retail (groceries etc.) as the only town-centre supermarkets are the Co-Op, which is under-trading by some margin, probably due to its poor relationship to the High Street, and an Iceland store.
- Rochester has a specialist tourist role in addition to acting as a district centre for the local population. It has a much higher proportion of food and drink uses than the other centres, both multiple chains and independent retailers, and an attractive, historic environment.
 Convenience retail provision is limited, with no supermarket provision in or on the edge of the centre.
- **Strood** Retail Park is performing significantly better than the main town centre, but poor linkages limit the extent to which the town centre benefits from these high levels of trade. Strood is particularly strong in terms of convenience retail, with 74% of visitors citing it as the main

- reason for their visit. However, the new ASDA store in the town centre is under-trading, suggesting saturation point may have been reached. Strood also suffers from a poor environment, exacerbated by levels of through traffic.
- Rainham is the smallest of Medway's town centres, performing a very local role. The environment of the pedestrianised shopping centre is rather tired, and the small Tesco store is significantly overtrading, but there is limited if any physical capacity for increased convenience retail provision. There are parts of the centre where an over-concentration of hot food takeaway uses is undermining its vitality and viability.
- Hempstead Valley, although classified as a district centre, does not
 perform the same role as the town centres. Its offer is mainly limited to
 retail, with recently improved food and drink provision but few servicetype uses (hairdressers, banks etc.). A number of multiple retailers
 (including Marks and Spencer) have their only full-line store in Medway
 at Hempstead Valley, suggesting that the success of this centre may
 have come at the expense of the traditional centres, to some degree.

Retail capacity

As part of the SHENA, an assessment has been carried out of capacity for future retail growth across Medway. It takes into account assumptions about population growth, future spending levels and retailer efficiencies, and makes allowances for online shopping and existing committed floorspace (i.e. sites with existing permissions). This results in the following capacity for new retail floorspace:

Projected retail floorspace capacity						
2020 2025 2031						
Comparison goods floorspace	-900m²	13,100m²	34,900m ²			
Convenience goods floorspace	6,000m²	7,900m²	10,500m ²			

Leisure capacity is harder to assess, because the floorspace required can vary significantly. This has therefore been calculated based on the increase in available leisure spend:

Projected capacity in leisure spend				
	2020	2025	2031	
Cultural services	£19.1M	£39.9M	£66.5M	
Recreation & sporting services	£7.7M	£16.1M	£26.9M	
Restaurants & cafes	£61.5M	£128M	£213.4M	
Total increase in commercial leisure spend	£88.4M	£184.1M	£306.8M	

All the above figures are rounded, and cumulative. The calculations assume that the Medway centres maintain their current market share. However, the

SHENA also notes that it may be possible to increase market share through development of an appropriate scale and mix.

Issues

Competition from Bluewater will remain a major factor in future plans for Medway's centres. Currently, Bluewater draws 26% of available comparison spending from the main catchment of Medway's centres (more than double the spend in Chatham), and a significant proportion of commercial leisure spending. Given national trends, it is unlikely this position will change significantly. Medway's town centres therefore need to develop a different offer, rather than trying to compete directly.

The markets in Gillingham and Strood have, in the past, made a significant contribution to the character and vitality of these centres, but are reported to be struggling recently. Rochester also holds a monthly farmers' market and there have long been ambitions through various masterplans to relocate this in order to better relate to the main centre. Consideration could also be given to whether providing a new or improved market offer in the other town centres could help to support the vitality and viability of the centres as a whole.

Increase in the residential population of town centres can help to maintain vitality and viability by increasing the local catchment, increasing activity levels to improve perceptions of safety, and helping to support the centres' role as transport hubs. Town centres may also have an important role to play in meeting employment need (see Economy chapter), addressing the imbalance between supply and demand, particularly for office-based and creative uses. All Medway's town centres are well connected to London through HS1 rail links; this is a significant asset in terms of both employment and residential marketability.

Chatham and Strood have a number of large, vacant or underused sites within and on the edge of the town centres which could have potential to accommodate residential development, whether standalone or as part of a mixed used scheme (on upper floors above retail, leisure or employment uses, for example). Opportunities in other centres are smaller-scale, although there is potential for smaller allocations and windfalls may come forward.

Care will have to be taken that any investment in retail and leisure provision meets the needs of the market; larger, modern floorspace is often in high demand. Given the difficulty in predicting longer-term trends in this sector, resilience of town centres is likely to be enhanced by ensuring that flexibility is built into any new development. This could take the form of regular footprints enabling amalgamation and subdivision to suit emerging space requirements, and high quality communications infrastructure to support ongoing technological advances in the sector.

QUESTIONS

- 25) Should we focus investment & retail capacity on Chatham to consolidate its position as Medway's highest order centre?
- 26) Should we seek to facilitate development in Chatham of sufficient critical mass to improve market share, or plan for investment to meet currently identified capacity only?
- 27) What should the mix be in Medway's town centres between retail and other supporting uses, including food and drink, commercial leisure, employment and residential?
- 28) Should we consider making provision for a new or replacement supermarket in Gillingham town centre? If so, where should this go?
- 29) What should our approach be to proposals for new or enhanced out of town retail?

Environment

Medway's urban areas sit within a striking landscape of the wooded slopes of the Kent Downs to the south and the expansive estuaries and marshes of the Medway and Thames to the north. The river Medway runs through the urban area, linking the towns and providing an economic, cultural and landscape focus. Medway's countryside is much more than a backdrop to its towns, but is also of international importance for its wildlife and landscape quality, and provides productive agricultural land and a resource for people to explore and engage with nature.

The position of Medway on the North Kent Coast and the natural and farmed landscapes on the Hoo Peninsula mean that it has a wide variety of habitats and a rich diversity of species. Many of these have been recognised nationally and internationally. Around 28% of the area, largely the mudflats, saltmarsh, and freshwater and grazing marshes bordering the Medway and Thames estuaries are Special Protection Areas (SPAs) and Ramsar sites due to their international importance for wintering birds. The estuaries have also been included in the first round of designations of Marine Conservation Zones. Sites of Special Scientific Interest make up nearly 30% of Medway's area, with some parts of the Hoo Peninsula being covered by multiple designations, and there are eight nature reserves (national and local).

The Kent Downs to the south of Medway are part of an Area of Outstanding Natural Beauty (AONB) that runs across the county from Dover to Downe, and include a Special Area of Conservation in the woodlands near Halling. The AONB is an exceptional landscape, and there are well established policy requirements to conserve and enhance its natural beauty.

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. There is a wide range of different landscape types: coastal marshes; chalk downland; orchards and shelterbelts; large scale arable farmland; and extensive tracks of woodland. Many local areas are highly valued by residents for their character and accessibility, providing settings for towns and villages, and for important heritage and environmental assets.

The Medway Landscape Character Assessment (2011) document⁵ has analysed the distinct landscape areas across the borough and provides planning guidance for the countryside and urban fringe. The assessment of the condition and sensitivity of the landscape provides evidence to support planning decisions on where and what forms of development are appropriate to protect, enhance and strengthen the key features of the area.

The Metropolitan Green Belt has part of its eastern boundary in Medway, to the west of Strood and around the villages of Halling and Cuxton. In addition to its function in preventing the outward sprawl of London, it provides

⁵ http://www.medway.gov.uk/PDF/Medway%20LCA%20Mar11 Main%20report.pdf

openness in the narrow area between Medway and Gravesend, managing against the coalescence of the north Kent towns and larger villages.

Medway's network of public rights of way extends to nearly 313km (190 miles), offering opportunities to explore coast and countryside, and connecting routes through the towns and suburbs, and including the Saxon Shore Way and North Downs Way long distance paths. The rollout of the English coastal path around the Medway and Thames estuaries in coming years will further promote opportunities to explore this area.

Planning for the protection and enhancement of the natural environment requires an understanding of the importance of securing connectivity through a wider green infrastructure network. A landscape scale approach helps to build resilience in wildlife responding to climate change, development and other potential pressures. Considering ecosystem services provides greater understanding of the existing and potential multi-functional benefits of landscapes. These can include:

- habitats for wildlife;
- food production;
- water storage and filtration;
- woodland for timber, fuel and as a carbon sink;
- access to open space to relax, exercise and learn;
- defining a local sense of place; and
- a focus for community activities.

Work on the Hoo Peninsula through the GIFT-T project⁶ analysed the features of its environment. This analysis was used to work with local people and businesses to develop plans to strengthen the Peninsula's green infrastructure. On a wider scale, the council has commissioned a Green Infrastructure Planning Project to analyse the principle components of Medway's environmental networks. This will help inform the planning process in determining the most sustainable locations for future growth, and securing multi-functional and high quality green infrastructure in new development.

Issues

There are some 'gaps' in the public rights of way network. In particular, greater access to the river would not only take advantage of Medway's central feature, but could encourage more journeys to be made on foot or bicycle, and promote tourism and community uses around the river. Opportunities exist to join up the river walk through urban Medway, linking its historic towns and waterfront regeneration areas with the wider countryside. Outside of the urban areas, the river and estuary offer potential for improved access, such as a riverside cycle route between Medway and Maidstone. However care is needed to ensure that the special and distinct qualities of the riverside and coastal landscapes are not lost.

⁶ GIFT-T Project website http://www.msep.org.uk/gift-t/

There can be tensions between opening up access to the countryside and the needs of wildlife. Research⁷ has shown that the internationally important birdlife of the SPAs can be damaged by the impact of people visiting the estuary. Dogs exercising off the lead, cycling and watersports are among the activities shown to cause disturbance to birds. These impacts could be a contributing factor to the decline of birdlife in the estuary. Action is therefore needed to address this potential damage, through avoiding inappropriate development, and land management, wardening and education interventions.

A key challenge for Medway is to accommodate the needs of the area's growing population alongside safeguarding its valued environment. Planning policy and legislation provide strong protection against inappropriate development of the most important designated sites. However non-designated sites can also provide valuable functions for biodiversity, landscape, and access, as the ecosystems services approach demonstrates. Such sites are often closer to where people live, and therefore much valued locally. Securing an effective green infrastructure network through new development will be critical to planning a sustainable future for Medway.

QUESTIONS

- 30) What are the most effective means to secure and strengthen Medway's environment, in the context of the area's development needs?
- 31) What opportunities should be pursued in the Local Plan to extend connectivity for wildlife and people throughout urban and rural parts of Medway?
- 32) What approach should be taken to determining the role of landscape in producing a spatial strategy for the new Local Plan, and development management policies?

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⁷ Liley, D. & Underhill-Day, J. (2013). Thames, Medway and Swale Estuaries – Strategic Access Management and Monitoring Strategy. Unpublished report by Footprint Ecology. Link: http://greaterthamesmarshes.com/wp-content/uploads/2012/11/NKEPG-140722-Strategic-Access-Management-and-Monitoring-Strategy-FINAL.pdf

Built Environment

Heritage

The Government states within the NPPF that "heritage assets are an irreplaceable resource and should be conserved in manner appropriate to their significance."

Medway has a number of the region's most significant historic environment assets including the historic City of Rochester and the military heritage of Chatham Historic Dockyard and its defences. It also has historic street patterns and forms of development, for example the long and winding Rochester and Chatham High Streets, and the historic bypass of New Road. Many of Medway's villages have medieval cores.

In addition, Medway's unique river and hillside topography is of historic significance in itself. Escarpments and the tops of hills were left undeveloped for military purposes with development confined to lower ground. Medway's landmark buildings are often of national importance, such as Rochester and Upnor castles, Fort Amherst, the Dockyard and the Cathedral. Together this gives a legacy of unique views and townscapes.

Many of Medway's heritage assets are protected by statute. There are over 900 listed buildings and 24 conservation areas in Medway. However, the historic environment is inevitably subject to pressures for change to meet new economic or practical demands.

Design

While Medway has a unique architectural and historic character in an outstanding estuarine landscape, there is also a legacy of former industrial brownfield sites, many in stunning settings, and some run down areas and centres in need of rejuvenation. Low-density suburbs spread out towards the countryside, and surround the older cores of many villages in the area.

It is anticipated that the scale of forecast population growth will require substantial expansion of the built area of Medway and the establishment of new neighbourhoods. This growth offers the opportunity to enhance those parts of the built environment that are rightly valued, and rejuvenate those areas that are not. Within this context, good design will be important in making the most of Medway's character and landscape, and in making Medway a good place to live and work.

Issues

Understanding of context and local distinctiveness is key to good design. It is therefore important to know which areas, from individual buildings to streets and whole neighbourhoods, and styles of development are distinctive parts of Medway's built environment. Conversely, it is equally important to be able to identify those areas that have a weaker character so that opportunities can be taken to improve and introduce distinctiveness.

Some of Medway's historic areas could be impacted by significant new significant new development, either within the areas themselves (for example, the Star Hill to Sun Pier Conservation Area), or close by, such as the waterfront regeneration sites next Rochester High Street and the Historic Dockyard. New development has the potential to bring economic life back to these areas, but it also has the potential to radically alter existing character. Development of the regeneration areas may well be large scale, including taller buildings, and therefore has the potential to impinge upon, or enhance, the setting of historic areas and landmarks. Medway Council has a View Management Policy⁸ with regard to tall buildings (over six storeys high) but this could be extended to other development.

The Local Plan also presents an opportunity to set out requirements and key design principles for the type of development we wish to see delivered in Medway. By seeking to deliver quality we can ensure that new development in Medway delivers successful places, that look, feel and function well, where people want to live. Delivering quality new development requires partnership working between landowners, developers, communities and the Council. Setting out key design principles in the Local Plan can help to facilitate these working relationships by ensuring that landowners and developers can be clear up front about the standards that will be expected and build them into schemes from the earliest stages.

QUESTIONS

- 33) What approach should we take to managing Medway's heritage assets, particularly in the context of bringing forward regeneration?
- 34) What characteristics do you think makes a good place to live?
- 35) What areas or characteristics of Medway are most distinctive? How should these be protected, enhanced or reflected in new development?
- 36) What areas of Medway have weaker character and what are the opportunities for improvements?
- 37) What requirements should be sought of new developments in Medway to give them a distinct character and ensure they function well, in both central areas (including brownfield sites) and suburban areas?

⁸ Medway Council Strategic Views and Landmarks: A Building Height Policy for Medway, Part 2 (2006) http://www.medway.gov.uk/PDF/Building%20height%20policy%20appendix.pdf

Rural Issues

The rural area makes up the majority of Medway's land area, but accommodates only around 12% of the population, primarily in the villages and hamlets of the Hoo Peninsula and the Medway Valley. The rural community has a notably different profile from the Medway average, with 75% of people being aged 16-64 years, compared with 66% across the whole borough, and a corresponding drop in the proportion of people under 16 (14% compared with 20%).

Medway's rural area is physically very diverse. It encompasses high grade agricultural land, strategic infrastructure and industrial installations, small and large villages, and protected habitats and landscapes. Agriculture is an important land use, including arable and horticultural crops. However, in the context of the larger urban economy, traditional rural business sectors such as agriculture, forestry and fishing only account for 1% of total business numbers in Medway. This compares to 3.3% in the southeast and 6.4% nationally. Like other sectors of the economy, agricultural business needs evolve over time, and the new Local Plan must address potential changes.

Although all villages lie within 12 miles of the urban areas of Medway, they have a strikingly different character and many have a sense of remoteness. Hoo St Werburgh is the largest village and acts as a service centre for the wider Hoo Peninsula. Many of the smaller villages have a limited range of services, and facilities are often in need of investment. In the summer of 2015 the Council undertook a Village Infrastructure Audit in conjunction with Parish Councils. This identified a number of shortfalls in the range, condition and capacity of local services and facilities.

In terms of housing stock, the rural areas have a greater proportion of large properties and relatively few of the smaller homes that may be affordable for first time buyers and young families, when compared to the main urban area.

Public transport in the rural areas can be limited and expensive, particularly in off-peak times. This is perceived as a greater problem on the Hoo Peninsula than in the Medway Valley, where the villages of Halling and Cuxton have railway stations with links to Strood, Maidstone and beyond, in addition to bus services. Around 6% of rural households do not have access to a car or van and are therefore reliant on public transport. This may become an increasing trend, given the aging population in Medway generally and the rural areas more particularly. A key challenge in maintaining the sustainability of Medway's rural communities is therefore securing access to services, jobs and extended choice of homes to support a good quality of community life.

High quality broadband services enable people to access other forms of service delivery, and are essential for many SME businesses including those who work from home. Rural Medway, in common with many rural areas around the country, experiences a poorer quality of broadband and mobile

services. The Broadband Development UK programme⁹ is investing in the upgrading of infrastructure to allow rural residents to benefit from improved high speed broadband.

All of Medway's villages (except those around Lower Rainham) have Parish Councils, which provide many of the services and facilities for their areas, such as play areas, allotments, burial grounds, village halls, and also stage community events. In addition to this, Cliffe and Cliffe Woods Parish Council are supporting their community with the preparation of a Neighbourhood Plan, to identify priorities and actions to address local needs. Work on this started in 2015.

- 37) How should the role of Hoo St Werburgh as a service centre be developed?
- 38) What provision needs to be made for employment in rural Medway?
- 39) How should the Local Plan address the need to maintain and improve access to services in rural areas?
- 40) What consideration should be given to strategic infrastructure and development in rural Medway?
- 41) How can the Local Plan ensure that strategic and local needs are satisfactorily addressed in areas working towards production of a Neighbourhood Plan?

⁹ https://www.gov.uk/guidance/broadband-delivery-uk

Infrastructure and Services

Health

Medway's population faces some health challenges. Average male expectancy is below the national average, and there are pockets of marked health issues in some neighbourhoods, with reduced life expectancy and health impairments. Lifestyle issues including smoking, obesity and alcohol are key contributors to high mortality rates of the major killers in Medway, particularly circulatory disease, cancer and respiratory disease.

A key objective of the Local Plan will be to promote a healthier Medway, seeking opportunities to support healthier lifestyle choices, making it easier for people to:

- access more nutritious food;
- walk, cycle and exercise locally
- engage in community life to boost mental wellbeing.

Safe and convenient access to a range of services, open space and the ability to participate in community life are intrinsic to supporting an individual's health and wellbeing.

Healthcare services in Medway are delivered through 55 GP practices, community health centres and the Medway Maritime Hospital. 150 GP practitioners serve a registered patient population of 295,223; this level of patients per GP is one of the highest in Kent¹⁰. The high number of single practice GPs in converted residential properties is a particular issue, particularly as many approach retirement.

The Medway Maritime Hospital is the largest and busiest hospital in Kent, serving a population of approximately 400,000 across the areas of Medway and Swale. It is on a constrained site in a tightly knit part of Gillingham, which places pressures on buildings and infrastructure, and can experience difficulties of access. There are increasing trends for healthcare to be delivered in community or home settings, which may help reduce the pressure on the hospital.

The Local Plan process presents an opportunity to assess the land needed to accommodate such changes, and any other spatial implications of this approach, for example demand for reliable high-speed communications infrastructure to enable delivery of "telecare" services. This may include consideration of relocation of some, or all, of the services delivered at the hospital site to more accessible locations in Medway.

¹⁰ Kent Growth and Infrastructure Framework 2015 – 2031. Available at: http://www.kent.gov.uk/__data/assets/pdf_file/0012/50124/Growth-and-Infrastructure-Framework-GIF.pdf

- 42) What changes to the built environment could facilitate healthier communities?
- 43) How can the Local Plan encourage access to healthy food options and growing opportunities?
- 44) How can the Local Plan most effectively promote greater physical activity in Medway?
- 45) What changes to the current siting of healthcare facilities should be considered in the Local Plan? Are there opportunities to provide new sites, and/or to integrate health services in local communities?

Social & Community Infrastructure

To ensure both existing and new residents benefit from the growth that will be delivered in Medway over the next twenty years it is important that social and community infrastructure, such as schools, GP surgeries, community centres and leisure facilities, are delivered in support of new developments in an timely fashion and in appropriate locations. There is also a challenge to deliver adaptations and improvements to existing facilities.

Education

Forecasting of future demand for school places shows that schools in Medway are generally at or close to capacity. The pressures are particularly acute for coming years in secondary schools. All new development coming forward over the plan period will need to contribute towards providing increased capacity in schools to meet the needs arising from their developments.

While some of this investment can be used to expand capacity at existing schools, the scale of growth forecast for Medway over the plan period will also require new provision. This will be a key consideration for areas that are the focus of substantial new development, and schools sites and buildings will need to be incorporated into the plans for major growth locations.

Community Facilities

There are a number of community facilities across Medway. Relatively few are in purpose-built community centres, with others in church or village halls. They play an extremely important role in accommodating community events and activities. They are, or can be, spaces for promoting social cohesion. Management of the facilities is also varied, with some run by the Council and others by independent organisations, individual churches, parish councils, charities or private businesses. Often, the financial viability of these facilities can be an issue as the relatively low income generating potential does not always meet maintenance costs, or allow for investment to improve capacity, standards and therefore marketability.

As Medway's communities change, facilities need to be responsive to these demographic shifts. For example, an increase in the black and ethnic minorities communities in Medway could bring new needs for places of worship. An ageing population may be more dependent on facilities that are easily accessible within walking distance.

To be successful in promoting integration, any new facilities delivered as part of large-scale strategic developments, need to be planned with reference to the needs of both existing and new communities. There may be opportunities to invest in improvements to existing facilities to expand their use and functions.

- 46) How best can the Local Plan secure the provision of new and expanded schools to meet the needs of Medway's communities and ensure that such infrastructure is delivered in a timely manner and located appropriately as a key element of sustainable development?
- 47) What community facilities are needed by Medway's population over the plan period, and how should they be delivered and managed?

Open Space

Open space offers multiple benefits for health, tourism, wildlife and place making. The open space network also brings a range of environmental, social and economic services such as:

- Capturing carbon
- Storing rain runoff
- Cooling urban streets and homes
- Providing a home for wildlife
- Preserving historically and culturally rich urban landscapes
- Creating local identity and sense of place.

Medway Council's open space portfolio totals 1900 hectares, and includes:

- 48 country sites;
- 3 country parks;
- 33 allotments:
- 125 play areas;
- 52 outdoor sports sites; and
- 25 formal parks & gardens.

A local standard of 3.25ha per 1000 population is currently used as a basis for assessing the level of provision, including that which should be made in new developments. This compares to standards of 6.14ha per 1,000 people in Tonbridge and Malling, 10.1ha in Gravesham and 7.39ha in Swale.

Medway has existing shortfalls in levels of provision for allotments (-40%), outdoor sport (-25 junior pitches) and play (-38ha). Some types of open space also have quality issues. There is significant spatial variation across Medway, with shortfalls more pronounced in some areas than others.

The Medway Wildlife Countryside and Open Space Strategy (2008 – 16), sets a vision of celebrated open spaces and countryside. Significant progress has been made towards this vision, with investment of £5.1M in playgrounds, allotments, parks and outdoor sports provision, but there is still work to do to fully realise it. Successes include the creation of seven Green Flag sites, and the establishment of 18 "Friends of..." Groups, taking local responsibility for raising the quality of their open spaces.

Issues

In a climate of pressured resources, there is an increasing challenge to secure a positive and sustainable future for Medway's open spaces and the communities that depend on them. New approaches to provision and management must be considered, to enable the council to better respond to current and future challenges around health, climate change, demographics and housing numbers. Continuing the existing approach will not be sustainable.

This may include rationalising the open space estate, allowing some sites to be declared surplus to requirements and put to other uses. The Council's ambition is to preserve the integrity of the open space estate, and given existing shortfalls in some types of provision, it would be a difficult decision. However, given the financial pressures, it cannot be simply ruled out. A less radical alternative might be to reallocate open space between the various types to better match need and supply, instead of seeking to meet shortfall through the provision of new land, with its attendant financial implications. A multi-functional model of open space provision could also reduce shortfalls.

In addition to existing shortfalls, anticipated levels of population and housing growth will put pressure on the open space network, with an anticipated demand of 230ha of new open space based on current standards. Given the importance of open space as a community resource and the benefits it can deliver, this demand will need to be addressed alongside housing growth. A further question is whether this demand should be met in its entirety within development sites. Alternatively, investment could be directed to multifunctional hub sites. Large new developments might accommodate a hub, while others could be in existing urban areas. In reality, a balance would likely be required between the two approaches.

In terms of management, open space delivered through new developments already tends to be managed privately rather than adopted by the Council. However, the approach to management of existing open spaces will also have to be kept under review if the Council's ambition of preserving the estate is to be met. This may mean difficult decisions about which open space types and sites are prioritised for available funding, and which partnerships continue to be delivered. There are other management models that could be considered, for example, increased community participation, which can also help reflect users' changing needs and profiles.

- 48) Is it an appropriate ambition to preserve the integrity of the open space estate, or should we be seeking to rationalise the estate?
- 49) Should we continue to set a local space standard and seek to address shortfalls by new provision, and if so is the current level of 3.25ha per 1,000 population appropriate?
- 50) Should we move to a multi-functional hub model of provision, and what might this look like in practice?
- 51) Should new development provide on-site open space, investment into the existing estate, or a balance of the two approaches?
- 52) What management models and priorities should we consider? Should we seek to increase community involvement in open space provision and how might this be accomplished?

Sports Facilities

Sport has a key role to play in promoting health and community life. It is an important part of Medway's cultural offer, and an area where investments have been made to improve the quality of facilities and encourage increased participation rates. Medway has wide-ranging sporting engagement and seeks to promote active lifestyles.

Quantity standards for outdoor sports pitches are encompassed in the open space standard discussed above. For various types of indoor sport, including swimming pools, Sport England sets recommended standards for the level of provision per population. Medway anticipates shortfalls in a number of these types of provision, given the level of population growth expected. It may be possible to meet some of this shortfall through community use of school sports facilities, rather than standalone new facilities, if agreements can be reached with the responsible bodies.

In 2012 Medway Council commissioned a 'Playing Pitch and Outdoor Sports Facility Study. This indicated that many facilities in Medway needed improvement. Over a third of football pitches, tennis courts and golf courses were rated as below average, and 60% of bowling greens fell short of expected standards.

In Medway participation in sport is generally lower than the South East and England averages and dropped between 2005/06 and 2014/15:

Participation levels in sport 2014/2015			
Medway	South East	England	
32.2%	36.9%	35.25%	

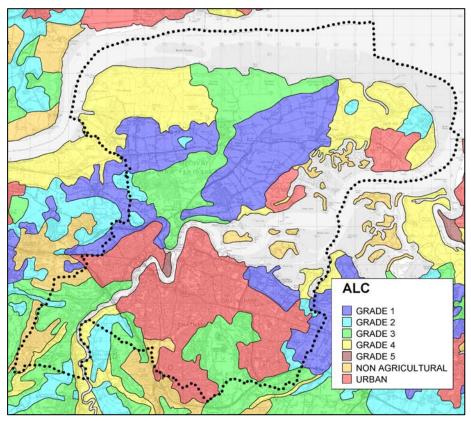
Gillingham Football Club has a strong association with Medway. Priestfield Stadium in Gillingham has a capacity of 11,582. The stadium is within half a mile of Gillingham Railway Station but is located in a predominantly residential area formed of high-density terraced housing. The club has aspirations to upgrade its stadium and has actively been seeking to move to a new location in Medway, releasing the Priestfield site for redevelopment.

- 53) What provision should be made for sport in the Local Plan, including in relation to population growth and new developments?
- 54) How should the Local Plan address the aspirations for a new stadium for Gillingham FC?

Natural Resources

Agricultural Land

Medway has a rich history of farming and it contains some of the best and most versatile agricultural land, as shown on the map below. Traditionally, much of this would have fallen within the North Kent Fruit Belt, and there are remaining orchards in some areas, particularly around Meresborough and in parts of the Hoo Peninsula.



Agricultural Land Classifications

Much of this land falls close to existing settlements, and is of interest for potential development. In some areas, the high quality land is not being used productively for agriculture, and the landscape has become degraded, with equine and urban fringe uses predominating.

QUESTION

55) What weight should be given to the protection of the best and most versatile agricultural land, in the context of considering sustainable locations to accommodate growth in Medway?

Air Quality

In 2015 the Council consulted on an Air Quality Action Plan for Medway. There are currently 3 Air Quality Management Areas (AQMAs) within Medway (Central Medway, Pier Road – Gillingham, and High Street – Rainham), all designated in August 2010. These were designated as these areas contained a level of nitrogen dioxide that annually on average exceeds 40ug/m3. The reasons for these high levels of nitrogen dioxide are due to transport types and traffic levels (mainly heavy goods vehicles and buses, plus congestion).

NO2 has been identified as having various adverse health effects, particularly on the respiratory system. Short-term exposure to this pollutant can increase the likelihood of reaction to allergens such as pollen and has been known to increase asthma in some people, especially children. It is estimated in that in the UK, air pollution reduces life expectancy of every person by an average of 7-8months, with equivalent health costs of up to £20 billion each year; an added burden on the NHS.

In Medway, 919 residential properties are within 10m of the roads in the Central AQMA, in Pier Road, there are 22 residential properties and in Rainham, there are 66 residential properties. In Central Medway in particular, there are also a large number of potential development sites within the AQMA, which could result in a large increase in population affected by the pollutant levels.

QUESTION

56) How should the Local Plan address the AQMAs and the potential development sites that could be affected by pollutants in these areas?

Minerals

The council must consider its contribution to the sustainable supply of minerals and this is recognised as a cross border issue due to the strategic nature of the resource.

Medway's geology provides deposits of sand and gravel, largely concentrated on the Hoo Peninsula. Their characteristics make them generally attractive for high specification value added concrete production. Total proven aggregate mineral resources in the Medway area are calculated to be 1,640,000 tonnes. The total potential (proven and unproven) river terrace sand and gravel reserves in the unconstrained areas of the Hoo Peninsula may range from 3,345,326 tonnes to 4,547,940 tonnes.

Currently there are no active quarrying operations in Medway, although there is extant planning permission for sand and gravel extraction at Kingsnorth Quarry and reserves at Perry's Farm, Grain.

Medway's wharves at Cliffe, Eurowharf and Isle of Grain make an important contribution to the importation of aggregates, particularly crushed rock and marine dredged aggregates into the south east region. Kent and Medway are together responsible for the importation of 90% of these materials into the region. The use of secondary and recycled aggregates is increasing as a supply source. Monitoring work through the authority's Local Aggregate Assessment in 2014 concluded that Medway was making an appropriate contribution to the needs of the region through its supply of this resource.

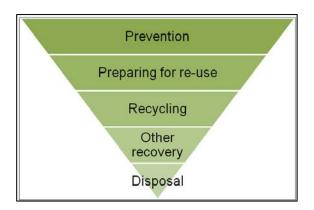
- 57) What approach should be taken to planning for land won minerals in Medway?
- 58) What are the requirements for wharves and their supporting land-side infrastructure in Medway over the plan period?

Waste

The Waste Management Plan for England (2013) and the National Planning Policy for Waste (2014) set the planning policy context for waste management. Whilst the NPPF does not contain policies specific to waste, its principles remain relevant.

Waste policy follows the principles established in the Waste Framework Directive ¹¹

- The European Waste Hierarchy (see below), which provides a framework of how waste management can be made more sustainable. Preventing waste from the outset is considered the best environmental option for waste management, with disposal being the least favourable option.
- The principle of self-sufficiency, which states that most waste should be treated or disposed of within the region from which it is produced.
- The proximity principle, which states that waste should generally be managed as close as possible to where it is produced, therefore limiting the environmental impact of transporting waste and creating a more responsible approach to waste generation.



Waste in Medway

In 2014 Medway produced approximately 120,400 tonnes of household waste (of which approximately 67,300 tonnes was residual waste and the remainder was sent for recycling or composting), and 38,900 tonnes of hazardous waste. Other streams of waste arising in Medway include commercial and industrial waste, and construction, however these are much more difficult to quantify. There are currently 3 Household Waste Recycling Centres open to Medway residents.

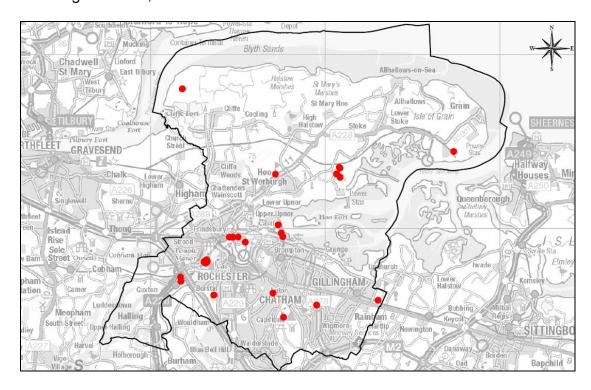
The Medway Council Municipal Waste Management Strategy 2005-2020 (2006)¹² aims to drive up rates of household recycling. A recycling rate of 42% was achieved in 2013/14. Much of Medway's household waste is treated outside of the area.

¹¹ https://www.gov.uk/guidance/waste-legislation-and-regulations#eu-waste-framework-directive

¹² http://www.medway.gov.uk/pdf/medway-waste-management.pdf

Extensive movements of waste occur between Waste Planning Authorities due to commercial contracts and the location of specialist recovery, recycling or treatment facilities. Evidence is currently being gathered to assess the level of waste that is expected to be generated within Medway across the plan period, taking into account existing contracts for disposal, and cross border waste movements. Medway's participation in the South East Waste Planning Advisory Group (SEWPAG) assists in the coordination of work between Waste Planning Authorities in the area, and participation in this group forms part of the Council's approach to Duty to Cooperate. Consideration will be given to implications of changes in waste management provision in other areas that may result in increased flows of waste into Medway.

Medway has a wide range of waste transfer and processing facilities that handle waste from both within Medway and from neighbouring authorities. In 2013, there were 29 waste transfer and processing facilities in Medway, handling over 650,000 tonnes of waste.



Issues

The existing Household Waste and Recycling Centres will come under increased pressure with the increasing population over the plan period. This need could be met by upgrades to the existing facilities, but consideration should be given to other options such as merging then into a central purposebuilt facility in a more accessible and appropriate location.

The current waste disposal contract is due to expire in 2035. If future disposal options for Medway's waste are to include a waste disposal facility within in Medway (such as waste to energy), planning for this would need to be considered at least 10-15 years prior to it being required.

A number of Medway's existing Waste Transfer Stations are located at Temple Waterfront, where an extensive regeneration programme is planned. To avoid a loss of waste processing capacity in Medway and the wider region, options will need to be explored for the relocation of these existing businesses.

QUESTION

59) What provision should the Local Plan make for waste management and disposal in Medway, for both household and commercial streams?

Sustainability and Climate Change

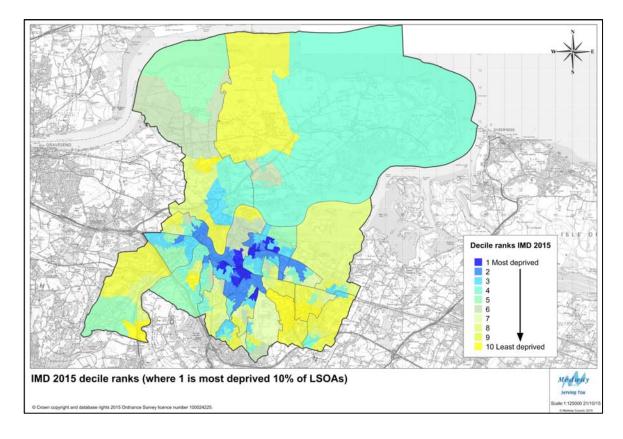
Sustainable development

According to national policy set out in the NPPF, "The purpose of the planning system is to contribute to the achievement of sustainable development." This "should be seen as a golden thread running through both plan-making and decision taking."

Sustainable development is a difficult term to define. It will be very different in each individual circumstance. In broad terms, it ensures development fulfils economic, social and environmental roles. It is possible for benefits under one strand to outweigh harm under another (and vice versa), but by keeping in mind the principles of sustainability, this can be considered holistically and solutions can be sought to ensure the three roles are appropriately balanced.

Social sustainability

Social sustainability is often referred to as "equity" or fairness. This is a significant issue for Medway, as the 2015 IMD, discussed in the strategic issues chapter, show that there is considerable variation between the prospects of people living in certain parts of Medway, often within very close proximity to each other. These differences include crime levels, employment levels and health issues, and contribute to a difference of over 5 years in life expectancy (between Cuxton and Halling, at 82.6 years, and Chatham Central, at 77.5 years).



Another aspect of social sustainability is access to services; for example, rural communities across the Peninsula often cite accessibility to Medway Hospital as a key concern while in some urban areas of Medway, safe and convenient access to green spaces is limited. This is also an issue for urban communities, and local neighbourhood centres can have a key role for many people who are dependent on services and facilities, and community networks within short distances from their homes. As online services become part of the mainstream delivery options, access to high quality and reliable broadband is intrinsic to community and economic life and opportunities. There is substantial scope to upgrade the quality of broadband infrastructure across Medway to support the needs of residents and businesses.

Housing is discussed in more detail in a separate chapter, but meeting housing need, including affordable housing, and ensuring this is in locations that enable or improve access to services, is one way that development can contribute to the social role of sustainability.

Economic sustainability

Medway's particularly poor relative performance in relation to employment and income in the 2015 IMD are clearly linked. Medway's position in both of these indicators has worsened since the previous IMD in 2010. Education, skills and training has not seen such a dramatic relative decline, but still shows a significant issue for Medway as a whole, with 43 neighbourhoods in the most deprived 20% and 16 in the most deprived 10%.

There is significant overlap between neighbourhoods ranked poorly on income and employment indicators and those which are most deprived overall and have other issues such as lower life expectancy.

Environmental sustainability

According the NPPF, the environmental role of sustainable development means "contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy." The majority of these issues are considered elsewhere in this report, however climate change is discussed in more detail below.

Climate change

The Government acknowledges that "climate change is one of the most serious threats facing the world today. It is not just a threat to the environment, but also to our national and global security, to poverty eradication and economic prosperity." All sectors of Government and

¹³ Ministerial foreword to "Climate Change: A Risk Assessment" http://www.csap.cam.ac.uk/projects/climate-change-risk-assessment/

business will have a role to play in limiting and addressing its impacts. Planning can play a key role in helping local communities, businesses and the natural environment meet this challenge. The NPPF acknowledges that addressing climate change is "central to the economic, social and environmental dimensions of sustainable development".

Mitigation

The key means of mitigating against the most severe climate change is by reducing emissions of greenhouse gases. A 2º rise in global average temperature is generally considered to be the limit above which the impacts will become much more significant and difficult for societies to cope with. In order to fulfil its part in enabling this target to be met, the UK Government has established a legally binding target to reduce emissions by 80% by 2050 (compared to 1990 levels), including a "carbon budget" to 2020 requiring 34% reduction levels.

Ways that planning can help to mitigate climate change by reducing greenhouse gas emissions include:

- Increased renewable and low-carbon energy generation
- Reduced energy demand & improved energy efficiency, both in new buildings and retro-fitting to existing buildings
- Distributing new development in a pattern that reduces the need for travel and maximises the potential of more sustainable methods of travel, to reduce emissions from private transport use
- Where new technologies can reduce the emissions from a business or home, supporting planning applications to enable this

The Government has set national standards for energy efficiency in new dwellings, enforced through the Building Regulations, and Local Authorities are discouraged from setting higher local targets.

Adaptation

Some degree of climate change is inevitable, given emissions that have already and are still occurring. The UK will experience rising temperatures, rising sea levels, more frequent extreme weather events and their consequent impacts. Studies of climate change impact nationally and internationally often have to make best estimates of what these might be, and how they might be addressed, because there is not always sufficient evidence to be certain. This complicates our ability to plan for climate change adaptation in order to reduce the future costs of these impacts, but the potential scale of risk is significant and doing nothing is not an option.

Adaptation measures can be taken for both individual buildings and development sites, such as incorporating green space and trees to reduce the urban heat island effect (large urban areas retaining heat, potentially increasing health risks during hot summer months). Consideration will also need to be given to how existing development can adapt to the impacts of climate change, particularly where space for these kinds of measures is

limited. Impacts of climate change in other countries may also have knock-on effects for the UK, so, for example, including space for food in new and existing development could help to increase food security.

Issues

Improvements to Medway's economy (see the Economy Chapter for more details) could be expected to contribute to the social role of sustainability as well. However, without improvements in education, skills and training, it may be difficult for existing communities to access the opportunities that arise through Medway's growth.

A particular issue for the South East of England is water supply. With hotter, dryer summers likely to become a feature of the UK climate, this could have significant implications for an area which is already seriously water stressed, according to the Environment Agency's 2013 classification. The significant levels of growth expected for Medway will further increase demand on water resources. The Government has set out optional Building Regulations for improved water efficiency in new dwellings, which can be imposed where local evidence justifies this.

Because of the relative uncertainty about potential impacts and solutions, it may be appropriate to focus on measures which are easy and lower-cost to implement, or which bring additional benefits. For example:

- space for food growing can have positive health benefits to local communities;
- urban trees can increase biodiversity and living in "greener" areas has been shown to improve mental wellbeing
- orienting buildings to take advantage of natural cooling as an adaptation for anticipated hotter summers reduces energy demand and therefore greenhouse gas emissions, acting as a mitigation measure as well as adaptation

- 60) What should sustainable development look like for Medway? What plans and policies should we put into place to achieve this?
- 61) How can Medway ensure that all communities share in the benefits of growth, in order to reduce the significant inequalities across the area?
- 62) What measures should new development take to mitigate and adapt to the risks posed by climate change?
- 63) How can existing development and communities mitigate and adapt to the risks posed by climate change?
- 64) Should Medway adopt the optional national standards for water efficiency? What local evidence would we need to underpin this?

Flood Risk

Flood risk is a combination of the probability and potential consequences of flooding from all sources including from rivers and the sea, rainfall, rising groundwater, and artificial sources such as overwhelmed drainage systems. The NPPF recommends a sequential, risk based approach to the location of development to ensure development can be safely and sustainably delivered.

Climate change, resulting in rising sea levels and increased frequency of extreme weather events, also needs to be taken into account. For new developments, this means ensuring adequate flood defences for sites within tidal flood areas (including the majority of Medway's waterfront regeneration sites), and ensuring that development does not increase the risk of flooding either within the site or elsewhere.

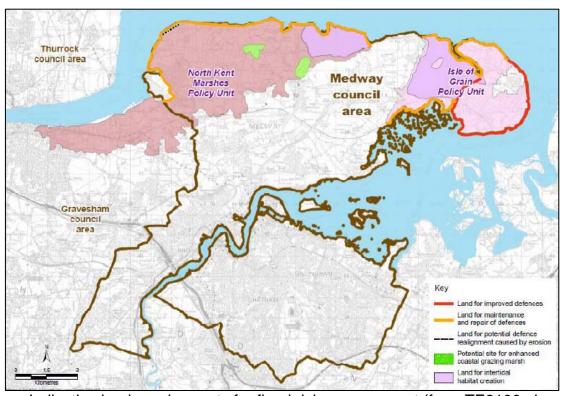
The NPPF states that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of Sustainable urban Drainage systems (SuDs), and that SuDs should be provided in all major development unless the particular circumstances of a site make this inappropriate. There are opportunities for multiple benefits to arise from this as, with good design, SuDs can also provide accessible open space, biodiversity enhancements (including as wildlife corridors), improved water quality and attractive landscape features.

Another consequence of rising sea levels is "coastal squeeze". Low lying habitats close to water, such as grazing marsh and intertidal habitats, are squeezed between the rising water levels and inland flood defences. In the Medway context, almost all areas of grazing marsh and intertidal habitats are designated as areas of national or international importance for wildlife, and coastal squeeze therefore presents a significant threat to Medway's natural environment.

The South East Coastal Group, made up of the Environment Agency and local and County Councils have published two Shoreline Management Plans relevant to the Medway Council administrative area. These plans set out policies to manage the impact of coastal flooding and erosion, including coastal squeeze. The plans indicate that in some areas of Medway, flood defences will not be increased to account for climate change, mainly around the North Kent Marshes, Allhallows Marshes and Grain Marshes. A process of managed realignment in these areas will allow for replacement habitat creation. However, the existing built up area at Grain (together with the important transport links leading there) will require continued protection. Some of the existing defences may therefore require improvement in the longer term, to meet increased risks. The majority of these requirements are expected to arise after the end of the current plan period (2040 onwards), but there may be a need to safeguard the land required, and for development

coming forward in these areas during the plan period to ensure that any flood defence works required address future risks.

The Medway Council area also contains areas located within two of the Environment Agency's Thames Estuary 2100 policy units which aim to incorporate improvements to existing defences as well as managed realignment.



Indicative land requirements for flood risk management (from TE2100 plan)

- 65) How should flood risk and SuDs be taken into account in planning for growth in Medway?
- 66) What safeguards should be put in place to ensure future requirements for improved flood defences are not compromised?

Energy

Existing energy provision in Medway

Medway makes a significant contribution to energy supply and security, with three existing operational power stations on the Hoo Peninsula. This includes the very recent replacement of Grain Power Station with an efficient Combined Cycle Gas Turbine station, including a Combined Heat and Power (CHP) circuit that takes waste heat for use in the neighbouring Liquefied Natural Gas (LNG) terminal. Plans for replacement of Kingsnorth Power Station, which ceased operation in 2012/13, are currently in abeyance. Damhead Creek power station, also located at Kingsnorth, has permission for a significant expansion in generating capacity.

In addition to these large-scale power generation facilities, the LNG importation terminal at Grain is the largest such facility in Europe and has the capacity to supply around 20% of the UK's forecast gas demand. A number of pipelines and cables forming part of the national energy supply network also cross Medway's area.

Renewable & low carbon energy

Government planning policy, both in the NPPF and in the National Policy Statements (NPS), which apply particularly to large-scale energy generation, is very supportive of renewable energy generation. The NPPF states that there is a "responsibility on all communities to contribute to energy generation from renewable or low carbon sources" and that policies in Local Plans should be designed to "maximise renewable and low-carbon energy development while ensuring that adverse impacts are addressed satisfactorily."

The position is different for onshore wind energy, where a recent Ministerial statement and consequent changes to the PPG set out that proposals for wind energy development can only be granted planning permission if it is in an allocated site or zone (not an area of search) and the proposal has the backing of the local community.

Although not low carbon in itself, use of waste heat from fossil fuel power stations can significantly enhance their efficiency, and reduce greenhouse gas emissions by reducing the need for additional heat generation for the end users. The permission for replacement of Kingsnorth power station included a requirement that the possibility of waste heat connections be available. At the time of the Lodge Hill planning application, connecting this development to the waste heat from Kingsnorth was found not to be viable.

Fossil fuel power generation can also reduce its climate change impact by use of carbon capture and storage. This technology is not yet in commercial use in the UK, although a number of research projects and pilot studies have been

undertaken or are ongoing, with Government support¹⁴. The replacement Kingsnorth power station has been designed to be carbon capture ready. The NPS for energy require any new coal-fired power stations to include carbon capture technology, and other fossil fuel powered plants to be "carbon capture ready" i.e. capable of retro-fitting the technology.

Issues

Energy is a complicated area, with different consent regimes depending on the location and generating capacity, as summarised below:

Energy consenting regimes			
Onshore		Offshore	
Up to 50MW generating capacity	Between 50MW & 100MW generating capacity	Between 1MW and 100MW	
Determined by the Local Planning Authority under the terms of the Town and Country Planning Act 1990 (as amended)	Submitted to the Planning Inspectorate as a "Nationally Significant Infrastructure Project" (NSIP). NSIP proposals are examined by a Panel of Inspectors and recommend to the relevant Secretary of State whether "development consent" should be granted.	The Marine Management Organisation is responsible for determining these proposals. However, planning permission (or development consent) may still be required for connecting infrastructure such as cabling where this comes ashore.	

NOTE: Prior to the Planning Act 2008, large-scale energy generation was considered under the Electricity Act instead of as NSIPs. Some proposals submitted under this regime are still going through the process of getting all necessary approvals, including Kingsnorth Power Station.

It therefore must be borne in mind that whatever policies the Local Plan includes for energy generation, any proposals above 50MW generating capacity will be determined in accordance with the NPS for energy, and local policies given limited consideration.

The Medway Renewable Energy Capacity Study was carried out in 2010. It identified potential for wind energy on the Hoo Peninsula (large scale over a restricted area, small scale over most of the Peninsula) and for solar thermal, photovoltaic, heat pumps and biomass to be incorporated into existing and new development. While the wind, solar and biomass resources will not have significantly changed since the time of this study, technology continues to advance in the renewable energy sector. New technologies emerge over time and existing ones can become more efficient in previously marginal situations.

¹⁴ https://www.gov.uk/guidance/uk-carbon-capture-and-storage-Government-funding-and-support

It is therefore likely that renewable energy capacity will have increased in Medway since the study was carried out.

Likewise, as heat costs rise and technology matures, the viability of using waste heat from Kingsnorth in large-scale new developments may change. Any large development sites near to the power station should explore this.

Solar farms were not a prominent technology when the Renewable Energy Capacity Study was carried out, but have become more frequent in recent years. Interest on the Peninsula, including previous planning applications, suggest it is considered a viable technology in this area. However, the Government has recently announced it will be ending subsidies for solar farm developments early, and it is not yet known what difference (if any) this will make to potential schemes. The main potential impact from solar farms is landscape harm, and concerns are also often raised about loss of productive agricultural land.

Renewable energy is a fast-moving sector and technologies are continually emerging or developing. Policies which are overly prescriptive risk becoming obsolete well before the end date of the Local Plan. Criteria based policies which are applicable to any renewable technology may be more resilient.

- 67) Should we allocate sites or zones for wind energy development?
- 68) What policies should we set for other forms of energy development?
- 69) How should we take advantage of opportunities for use of waste heat from the large-scale energy generation on the Peninsula?

Transport

An effective and efficient transport system is essential to ensure Medway is an environmentally sustainable, economically prosperous and socially inclusive place.

Whilst Medway has enviable strategic transport links to Kent, London and Europe, there are some issues in how the transport system currently operates. A key challenge for the Local Plan will be putting a robust strategy in place to address the deficiencies in the transport network to ensure that it better serves existing residents and provides the necessary increased capacity to accommodate growth anticipated over the plan period.

Transport in Medway

Medway is strategically linked by the A2 connecting the five towns. There are river crossings through the Medway Tunnel and across Rochester Bridge, as well as on the M2. Medway is served by rail links, within the area and to/from London and north Kent. There are 5 train stations in Medway, one in each major urban area (Strood, Rochester, Chatham, Rainham and Gillingham), plus two smaller stations on the Medway Valley line between Medway and Maidstone. The introduction of the HS1 rail line has strengthened strategic links with London and the rest of Europe. All the stations and services are operated by Southeastern. As part of Network Rail's route utilisation strategy, substantial investment is being delivered in a new station for Rochester and platform improvements at Strood.

The bus network extends through the urban and rural areas, with a modern interchange at Chatham Waterfront. Arriva operates approximately 95% of the local network. A bus quality partnership is in place between the Council and Arriva to improve bus journey times and promote patronage increase. The network also extends to the neighbouring towns of Gravesend, Sittingbourne, Maidstone, and to Bluewater. The River Medway acts as a physical barrier, restricting bus routes to some parts of Medway. Although the bus network extends across the rural area, there are some concerns about the frequency, timing and cost of services.

The extensive network of footpaths, cycle-routes, and bridleways across Medway offers routes for functional travel as well as its leisure and tourism role. There are opportunities to enhance the network to encourage people away from using their cars, increasing accessibility across Medway.

Rochester Airport dates back to the 1930s, and is used by light aircraft for leisure, business, training, heritage and emergency services. In 2014, the council approved a masterplan to modernise the airport facilities alongside employment provision. There is also a leisure airfield at Stoke, catering primarily to microlight aircraft.

Medway's waterfront location supports both commercial and leisure marine activities. The ports and wharves offer access close to London, and although

developments such as London Gateway may draw trade from local ports, there is ongoing activity. Aligned to the wharves, there is a need to ensure adequate landside capacity for onward movement of freight from deepwater ports and local berths. The marine leisure industry contributes to Medway's culture and economy, with a number of marinas, yachting and motorboat activities. There is a reported demand for additional berths and access points to the river, and opportunities for new business and community activities, where these are sensitive to the natural and historic environments.

Issues

Although there are good links to the strategic road network, there are some congestion issues on the motorways, and problems on the M2 and M20 often create knock on effects for the local road network. Medway has a number of heavily trafficked roads and some general concern about congestion on the road network, which also results in air quality issues. Some sections of the A2 are operating well beyond their notional capacity, resulting in recurrent congestion especially during peak times. There is also growing overcrowding on peak train services. Further evidence of how growth patterns will influence traffic movements will be required to determine how Medway's transport network will need to adapt over the plan period. The Council is in the process of commissioning this evidence.

The Council can influence the condition of the transport network by making sure that the effect of future planned development on existing infrastructure is minimised, whilst positively planning for new infrastructure where this will be required. Further investments are planned to upgrade links between the Four Elms Roundabout and the Medway Tunnel.

Rates of cycling to work in Medway (0.7%) are well below the national (2%) and regional (1.9%) averages. This may reflect high levels of commuting out of Medway, but may also relate to infrastructure provided for cyclists.

In planning for growth in Medway and responding to Government policy to increase sustainable modes of travel, consideration needs to be given to:

- The capacity of the existing network to accommodate additional growth, and where investments may be needed in new infrastructure;
- An effective, accessible and affordable public transport system;
- Provision for walking and cycling to support options for non vehicular journeys, and make it easier for people to reach local services and facilities and move around Medway;
- Sustainable travel being central to the design of new developments, both in terms of larger-scale strategic sites and those sites which will be integrated into the existing urban fabric;
- Parking provision in town centres, residential and commercial developments.

- 70) What infrastructure is required to support Medway's growth over the plan period?
- 71) What measures should be considered to increase public transport usage and rates of walking and cycling in Medway?
- 72) What provision should be made for car parking?
- 73) What are the requirements for waterside infrastructure, such as docks, wharves, marinas, piers and berths, and their supporting landside facilities, to support commercial and leisure activities?
- 74) How should the aviation facilities at Rochester Airport and Stoke be considered in the Local Plan?

Deliverability

When developing the new Local Plan, it will be important to demonstrate that the policies and land allocations within it, are deliverable. There is also a particular emphasis on deliverability of housing land, with various Government initiatives looking at how this can be improved and, crucially, made quicker.

Viability

Some initial assessment of viability has been carried out as part of the SHENA. There will be a need for further evidence to support this for later stages of the plan preparation.

Initial work suggests that while Medway's land values are often significantly lower than in nearby areas, there is sufficient viability to support affordable housing delivery and some contribution towards infrastructure without blocking development. There is some variation in land values, and it is possible that higher value areas (mainly rural Medway, some parts of Chatham Maritime, and central Rochester) may be able to support higher levels of contribution.

Infrastructure

The infrastructure requirements identified in earlier chapters need to be delivered at the appropriate time and locations to meet the needs arising from the significant levels of new development anticipated across the plan period. Subject to viability, the funding for this can often be provided by the developers of the site. For larger schemes, provision within the development site is possible for a range of infrastructure and services, while for smaller schemes and types of infrastructure that serve a larger catchment (such as secondary schools) financial contributions towards the provision or improvement of off-site facilities is more common.

This has previously been through a system of legal agreements known as Section 106 (s.106) agreements, which are individually negotiated for each planning application.

Moving forward, the ability to fund significant levels of infrastructure from s.106 agreements will be reduced. Restrictions on pooling mean that, legally, no more than five individual s.106 agreements are permitted to contribute to a single project or type of infrastructure. Instead, Councils are encouraged to move towards adoption of a Community Infrastructure Levy (CIL). This will set a charge based on floorspace which will be paid by all new development, subject to exemptions set out in the legislation, for example for affordable housing and starter homes.

Unlike s.106 agreements, CIL does not have to be negotiated separately for each application and therefore provides a high level of certainty for developers and landowners. It also does not have to be spent on

infrastructure needs specifically relating to the individual development, instead being put towards a general funding stream for infrastructure in the local area. While this does has some advantages in terms of prioritising the areas of projects of greatest need, it does present potential issues in terms of ensuring that infrastructure needed to support residents of a new development (or to mitigate its impact) is delivered in a timely manner. This problem may be reduced for large-scale sites as developers can choose to make payments in kind to meet their CIL liability, by providing infrastructure themselves to an equivalent value.

The Council is considering whether to produce a CIL charging schedule alongside the new Local Plan. There will still be a residual role for s.106, for example for delivering affordable housing, the mitigation strategy for impacts on the SPAs (see Environment Chapter) and site-specific requirements such as highway improvement works.

New methods of delivery

In seeking to improve both speed and deliverability, particularly of housing development, the Government has considered and implemented a number of initiatives to remove perceived delays from the planning process. These include:

- Extending permitted development rights to change to residential for a range of other uses. Although initially introduced on a temporary basis, many of these permitted changes of use have since been made permanent. Generally, they are implemented by a prior approval procedure which allows the Council to consider specific impacts, but not the principle of the conversion.
- Encouragement for use of Local Development Orders (LDOs). LDOs have been in existence for some time, but have not had a high level of take up. They effectively act as a local permitted development scheme, where the Council sets out types of development which will not need a separate planning permission within certain parameters. The Government has set a requirement for 90% of suitable brownfield land (excluding that already identified for housing use) to be covered by LDOs by 2020. LDOs may also have potential for other sites and uses, for example to encourage economic development in suitable locations.
- Enterprise Zones are one of the few initiatives not directed specifically at housing developments. Instead it relates to business development. The Council, in conjunction with the South East LEP, is seeking Enterprise Zone status for Rochester Airport Technology Park.
- Permission in principle. This is a new Government policy, and limited information is currently available on how it will operate. It may cover brownfield sites in a similar fashion to LDOs, or it may extend to allocated housing sites, meaning that planning permission would only then be required for the details of the development.

Issues

While there is evidence of reasonable levels of viability in much of Medway, this is very variable. A high reliance on brownfield and urban development land could leave the Council in a vulnerable position in relation to deliverability, as these sites are often subject to higher and unforeseen costs, such as de-contamination and site clearance. They are also often in areas of lower value. In terms of the waterfront regeneration sites, the cost of flood defences can be a significant issue for viability, and the Council has been exploring alternative funding options for some of these works, for example at Strood Riverside, to unlock development potential.

Other policies in the Local Plan will also have an impact on viability. For example if the Council were to impose specific requirements regarding design, on-site open space provision, or local water efficiency standards, these could potentially increase development costs. The Council will need to carefully consider these impacts throughout the Local Plan process to ensure that the Plan and its policies remain deliverable.

The Council is not the only body responsible for infrastructure provision, and even in areas where it has an overseeing role, it may have limited control over actual provision. For example, while the Council may identify a need for a new school, the Government expect new provision to be primarily in the form of Academies or Free Schools, over which the Council has limited control. There are also a number of sectors, such as health and social care, where the models of delivery are undergoing significant change, making it increasingly difficult to plan for future requirements.

Some housing types are exempt from CIL (see also Strategic Issues), which causes issues in terms of ensuring infrastructure demands arising from these developments are met. In addition to specific types of development, existing floorspace on a site can also be discounted from CIL liability. This has potential to significantly reduce the potential income from CIL in an area like Medway where a high proportion of development is expected to come forward on brownfield land, both allocated and windfall sites.

Large-scale sites, including some of the waterfront regeneration sites, often come with high infrastructure requirements. While CIL will make a contribution to these, it is unlikely to generate sufficient funding in itself. The Council will have to consider what additional funding may be able to support infrastructure delivery in order to secure the benefits of growth. Given general restrictions on public funding at present, there is no guarantee about what level of funding this might involve. There may therefore be difficult decisions about which infrastructure projects or types are prioritised for the available funding.

- 75) How can the Council ensure that the Local Plan and its policies remain deliverable while seeking to ensure that development in the area is high quality and sustainable?
- 76) Should we consider setting different rates of affordable housing and CIL contributions to take account of differing viability between areas of Medway?
- 77) How can we ensure timely and appropriate delivery of infrastructure to meet the needs of new and existing communities? What infrastructure types or projects should be prioritised where funding is limited?
- 78) What use should be made of new methods of delivery to help speed up the planning process, and how can we ensure that quality is not compromised in favour of speed?

Development Strategy

Background & Context

Medway is expected to see a significant level of growth over the plan period to 2035. While the area has had significant expansion in the past, it is likely that the rate of growth will be amongst the highest seen, and will have a significant impact on what Medway will be like as a place.

This offers both threats and opportunities. There is a genuine chance for economic, physical and social regeneration to establish the built up area of Medway as an exciting, modern waterfront city fit for the 21st Century. Ensuring that development meets the needs of all the citizens of Medway in providing high quality homes, jobs, leisure, and educational opportunities, and that it enables healthy and sustainable lifestyles, will be a key part of this renaissance.

There is a need however to protect what makes Medway special; its built and natural heritage. There is also a need to ensure that new development is accompanied by adequate transport and social infrastructure (schools, community facilities, hospitals).

Getting the balance right between protecting what is special and realising the opportunities that growth can bring will not be easy.

Lodge Hill

In previous iterations of planning policy for Medway, the provision of a new settlement at Lodge Hill was central to the area's development strategy. The current status of this proposal is subject to a great deal of uncertainty. In September 2014, the council's Planning Committee resolved to approve the outline planning application for Lodge Hill. This included development of up to 5000 homes, 43,000m² of employment land, and various supporting services and infrastructure. It also included a mitigation and compensation package to address the impact of development on the designated habitats at Lodge Hill, in particular the nightingale population. Following a referral to the Secretary of State, the application was called in. A Public Inquiry is scheduled for 2016.

If it goes forward, the scheme has the potential to make a major contribution to meeting Medway's development needs, providing homes, jobs and services, in a sustainable and planned way through a new settlement. It would provide wider services for communities on the Hoo Peninsula.

However, given the uncertainty on the site, in advance of the outcome of the Public Inquiry, the new local plan must consider options for development, should Lodge Hill not form part of Medway's growth strategy. This involves not only identifying sufficient alternative land for the homes and employment proposed at Lodge Hill, but also a fundamental review of the development strategy being promoted for Medway. In particular, in the absence of development at Lodge Hill, consideration needs to be given to the Hoo

Peninsula in the local plan. To secure the sustainability of the rural settlements on the peninsula, meeting local needs for services is important. The options for further development across the wider Peninsula must be assessed as part of the local plan process.

Development Principles

It is important that new development provides for high quality of life. In addition, the government requires development to be as sustainable as possible. In recent years the following principles have come to be recognised as helping to meet these two objectives:

- Rich Mix of Uses The accommodation of different uses in proximity to each other encourages people to walk and cycle to school, work, and the shops.
- Permeability This refers to the ease with which people, not cars, can move through an urban area by a choice of routes. This means all parts of the neighbourhood are accessible, with an emphasis on nodes of activity like shopping centres, adding to its pedestrian-friendliness and urban character.
- **Urban Blocks** A strong framework of streets is not just about movement. It is also about giving structure and form to an area.
- Public Transport Bus/tram stops should be planned so that they are safe and accessible to the maximum amount of people giving a real public transport alternative to (but not replacement for) the car.
- Density –The key to increasing the amount of walking, cycling and public transport use is compactness: if housing is built near to facilities then travel time is reduced, and sustainable methods of transport are encouraged. Increasing compactness also increases vitality and vibrancy of commercial and community services and facilities, by ensuring that there is sufficient footfall and demand to support them. Higher density development also minimises the amount of land that is required for housing and therefore helps to minimise the impact on existing suburban neighbourhoods and the countryside.

Patterns of residential development

The pattern of growth, whether it is high density confined to previously developed sites, or suburban expansion in the countryside (to take but two options) will have a substantial effect on realising the opportunities that come with growth whilst mitigating the threats.

Alternative patterns of growth, along with their attendant advantages and disadvantages are outlined below:

High-density town centre and riverside development.

The last few years has seen the growth of new riverside communities in highdensity developments of apartments. This has been successful in meeting new lifestyle trends and enabling a high quality, urban style of living. This trend will continue. Chatham Docks has planning permission for high-density residential development, and it is also encouraged by the masterplans for central Chatham and parts of Strood.

By bringing residents back into urban areas, high-density development can help sustain shops, offices, leisure and other facilities within centres for the benefit of all. It can also enable more sustainable lifestyles that are less dependant on car travel.

However, apartment living is not suitable for everyone. In particular, it is unlikely to provide the space that many families desire and need. In addition, the land that is currently available for high-density living will only be sufficient for a fraction of Medway's housing needs.

Currently, high-density development in Medway does not generally approach the densities seen in London or even in other major urban areas. Increasing densities further could help to reduce land take elsewhere and provide increased critical mass to support facilities, but would have implications in terms of building height and form, and would only be able to provide limited car parking, instead relying on public transport. As such, this type of development would have to be located close to existing or new public transport hubs and preferably close to a good range of facilities.

A further option to maximise the contribution of high density residential development to meeting Medway's growth needs would be to expand it into areas not traditionally proposed for this type of development. This might include existing large-scale development sites at Rochester Riverside and Strood, taking advantage of opportunities to comprehensively plan these areas as new and enhanced neighbourhoods. A strategic approach to renewal in areas of ageing housing stock may also be an option for investing in raising quality standards.

Consideration could also be given to redevelopment of existing employment areas such as Medway City Estate. This would be a difficult and radical strategy, not least because large-scale land assembly would be required and existing businesses would have to be supported through relocation. However, work carried out by Sir Terry Farrell as part of a Thames Gateway regeneration strategy in 2009 showed how redevelopment of Medway City Estate could provide a new urban heart for Medway, incorporating mixed used development and parklands. Clearly this would require careful consideration, as any benefits accruing from such a redevelopment would have to be balanced against the loss of an established and successful employment area, albeit with some identified problems such as poor access and public realm.

Incremental suburban development

Previous growth of Medway has been at the periphery of existing built up areas. This is logical and by ensuring that development is near to existing sewerage, water and other utilities, is often easy to achieve. Because of this it is the default option of most developers, who often have landholdings or

options in these areas, therefore ensuring that land can be made available for development in a timely manner. However, the scale of growth is such that Medway would see very substantial new housing estates added to all or most of its current edges. This could include Rainham, Capstone, and subject to green belt changes, Strood and Wainscott. It would also see substantial new housing estates around many villages on the Peninsula.

Because the growth is incremental, it can be more difficult to plan for improvements to roads and community facilities. It also has an impact on the countryside areas closest to built-up area of Medway and may therefore be viewed as detrimental by many people.

On the other hand, well planned low-density estates could enable the most sensitive countryside features such as hedgerows, field patterns and important trees to be preserved, and could even enhance access to these areas. Such estates can be attractive in themselves, with good design, and could provide the larger family houses that Medway needs.

It should be noted that because this is often the easiest and quickest form of development, at least some incremental development will be necessary in meeting Medway's housing needs in the short term (i.e. over the next five years). If this option is chosen as the optimum means of providing for the growth of Medway over the whole of the plan period then it may be necessary to review green belt boundaries in order to provide for a sufficient quantum of development.

Significant planned growth of existing settlements

By planning for the substantial growth of an existing settlement, it is possible to require substantial improvements to the centre itself to provide better shops, schools and community facilities, improved streets and open spaces, such that the place functions better and the quality of life is improved for all.

The scale of development required by this approach is such that it would radically change the nature of the settlement (for good or bad). It could however, reduce the need for development elsewhere.

This approach is most applicable to Hoo, where growth could enable the provision of facilities that are of benefit to the whole of the Isle of Grain. To sustainably accommodate this level of future growth it might be necessary to reconsider Hoo's character and role, making it into more of a "market town" for the Peninsula, rather than the village simply becoming ever larger as under the incremental growth scenario. With this approach, a larger scale of planned growth would come with improvements to existing facilities and provision of new. At a smaller scale, development round some of the villages, would provide an increase in population to help support the continuing viability of village shops, pubs and schools.

However, this approach can take longer to deliver, and there is a risk that improvements to infrastructure and facilities may suffer a time-lag from

housing delivery, undermining the sustainability of the enlarged settlement and causing problems (albeit temporarily) for existing and new residents.

Freestanding settlements

Freestanding new settlements in the countryside could minimise the impact on peripheral areas of Medway and existing neighbourhoods. At sufficient scale, this could to reduce the need to build in all areas of Medway.

Because they are planned from new, such settlements offer opportunities to provide a range of shops, schools and other community facilities, parks, and employment in medium density centres and with lower density suburbs within walking distance. Freestanding settlements could also provide an outstanding green infrastructure with country parks, footpaths and bridleways offering increased access to the countryside and open space for the benefit of existing as well as new residents.

The 5000 home settlement proposed for the former military site at Lodge Hill on the Hoo Peninsula is an example of the scale required to make such settlements work. Whether or not Lodge Hill goes forward (see discussion above), there may be scope for further freestanding settlements on the Hoo Peninsula.

There is also scope for smaller freestanding settlements, around 1km in area, planned as 'garden villages' to accommodate up to 2000 houses each along with local shops, parks and primary schools. If placed in reasonably close proximity to larger freestanding settlements, or existing but improved centres such as Hoo, they could help support a greater range of facilities in the larger centres.

New settlements take a long time to plan and deliver. They are therefore unlikely to meet Medway's housing needs in the immediate future although they could help to do so in the medium term. There is also a risk that provision of high quality, modern facilities in a new settlement could "out-compete" existing settlements leading to their decline.

Urban Extensions

Urban extensions are large-scale planned extensions to an existing built up area. As with large freestanding settlements, each extension would be of sufficient scale to allow for the provision of good community facilities. An added advantage is that urban extensions would be in relatively close proximity to existing transport connections and within easy reach of existing communities such that these areas could also benefit from improved facilities forming part of the development.

There is scope for such an extension between Rainham and Lower Rainham Road and perhaps between Frindsbury and Chattenden. It would also be possible to plan extensions along the Capstone and Horsted valleys. However, the topography and the surrounding road systems of the valleys are

such that development in these areas would be in the form of relatively selfcontained enclaves. The benefits that could accrue to surrounding areas would therefore be limited.

Development in any of these locations would erode or largely remove strategic green buffers and could cause coalescence of existing settlements and communities.

Custom and self build

Custom and self build houses are, as the name suggests, houses that are built by individuals or by small communities of would-be residents. Such developments would be distinctive and offer real opportunities for community development and pride.

They are not likely to be built in sufficient numbers to meet anything other than a small proportion of Medway's housing needs. However, they offer an interesting alternative to the standard housebuilders' product and could be a worthwhile part of major housing developments under any of the above scenarios, or as smaller stand-alone schemes.

Chatham town centre

The smaller town centres are relatively well defined in terms of their local roles, and while they may need some improvement, protection or investment (as set out in the chapter on Retail, Leisure and Town Centres) this does not go to the heart of Medway's development strategy.

However, questions remain about how Chatham town centre should respond to issues, threats and opportunities over the plan period. As the highest order centre of Medway, the role that Chatham plays in future growth will have a significant impact on the kind of place that Medway as a whole will be. A particular issue is the significant scale of potential development sites in Chatham centre and Waterfront, and how these should best respond to Medway's development needs.

Options for enhancing Chatham town centre include:

Retail and civic heart

Additional residential development and retail floorspace to help strengthen the town centre's historic function as the retail and civic heart of Medway has been the Council's strategy to date.

Whilst it has been difficult to attract and retain retail in recent years, this could become more achievable if the concentration of residential in the town centre increases, although it may still be challenging given ongoing retail trends. The success of this strategy is therefore likely to require the delivery of high-density development in the town centre. It may also require redevelopment of

existing surface car parks, so will have implications for the parking strategy and public transport strategy.

Under this scenario the Chatham Waterfront sites might accommodate blocks of residential development with high quality retail space on the ground floor.

A thriving mixed-use centre

Additional employment floorspace and additional residential development, supporting existing retail floorspace.

Alongside additional residential development (as in the retail heart option), this option would seek to accommodate employment uses suited for town centre locations (see Economy chapter). New (or replacement) office and hybrid/workshop space would be required to be delivered as part of the identified regeneration sites or on existing vacant retail sites. Increasing the amount of employment activity in the town centre would increase footfall thereby making the existing level of floorspace provision more viable and enhancing the vibrancy of the retail offer.

Given the additional employment floorspace in the town centre it is not expected that there would be space for significant additional retail floorspace. However, this may be a more deliverable strategy given the changing patterns in retail behaviour discussed above, and there may still be scope for improvements to some of the existing retail provision, such as the Pentagon centre (subject to funding).

Hybrid and workshop type space meet a different sort of need to office accommodation, and as identified in the Economy chapter there is likely to be growing demand for this. However, access and amenity issues can be more problematic than for standard offices, and would need to be carefully considered.

Under this scenario, the waterfront sites might accommodate a mixture of residential and employment floorspace.

A vibrant urban neighbourhood and large district centre

Maximising additional residential development and allowing for a controlled reduction in retail floorspace.

Although reducing the scale of the retail offer would reduce choice it may increase the viability and vitality of the area retained by focusing activity. In doing this it would seek to ensure that the town centre accommodated sufficient retail floorspace to meet demand for convenience goods (i.e. food and drink) but allow for a managed reduction in comparison goods floorspace, assuming that these needs would be meet though online shopping or at the established regional and sub-regional shopping hubs.

However, it is likely this would change the character of Chatham from a town centre to a large district centre. Whilst there are good examples of large, vibrant district centres, this would be a significant departure from the historic role of Chatham.

Under this scenario the Chatham Waterfront sites would be almost entirely residential. In addition the High Street could be reduced in length and sites redeveloped for residential development. A more radical version might protect the High Street but seek the long-term redevelopment of the Pentagon Centre to accommodate residential with a reduced scale of retail provision.

Issues

It is unlikely that a single pattern of development will be able to provide for all of Medway's development needs. There are advantages and disadvantages of each. Good planning will require a more detailed place-by-place analysis with an emphasis of finding the best mix of patterns such that growth needs can be met, and the majority of people can benefit from the opportunities offered by growth.

QUESTIONS

- 79) Are the development principles right? Should other guiding principles be introduced?
- 80) Do you agree with the assessment of advantages and disadvantages of the various development type options set out above? Are there other advantages and disadvantages that should be considered?
- 81) Which development type (or combination of types) do you think best meets the identified growth requirements for Medway?
- 82) Should we consider more radical approaches to meeting development needs, such as significant increases in density, or large-scale redevelopment of existing employment areas for residential or mixed use?
- 83) Should the green belt boundary be reviewed?
- 84) What provision should be made for mixed use in residential developments, both high density and lower density?
- 85) What approach should be taken to future development opportunities and mix of uses in Chatham town centre and Waterfront?
- 86) Do you agree that the other town centres require improvement in their existing roles, or should we consider holistic review of any of them in conjunction with nearby waterfront regeneration sites?

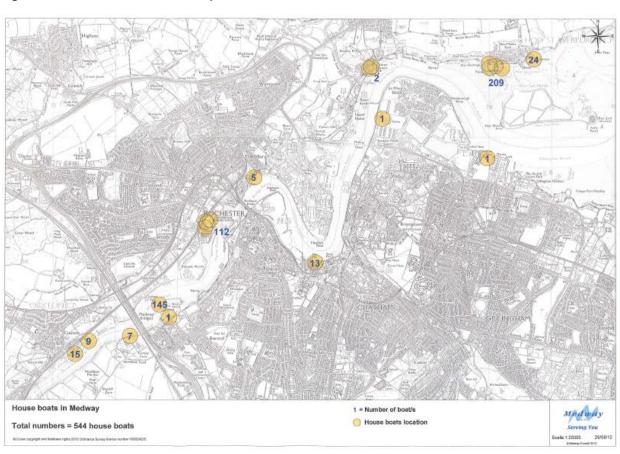
Housing Requirements for Specific Groups Extract – Draft SHMA September 2015

1. Housing Requirements for Specific Groups

- 1.1 This section considers the housing requirements of specific groups whose housing needs might differ from the majority of the population in Medway. The following specific groups pertinent to Medway, are considered in greater detail within this section:
 - Older Persons The national trend of an ageing population means this group is important to consider. Older person households exhibit particular requirements and needs that require consideration, such as adaptations and support in the home to remain living independently.
 - Groups with Specific Support Needs Analysis is undertaken of the longer-term projections from the Projecting Adult Needs and Service Information System (PANSI) for a range of mental and physical disabilities, and the propensity for such conditions in Medway;
 - Younger Person Households The number of households in the 15 24 and 25
 34 age groups are anticipated to increase by 5% and 13% respectively, 2013
 2033. The younger age group also formed a significant proportion of in-ward and out-ward migration into Medway in 2013.
 - Black and Minority Ethnic (BME) Groups Ethnic diversity in Medway has increased between the 2001 and 2011 Censuses, supported by the influence of international migration to population growth. 2011 Census data shows that minority (non-white) ethnic groups made up approximately 10% of the Medway population, which is higher than the average for Kent and the majority of neighbouring HMA local authorities (with the exception of Gravesham and Dartford). Increasing diversity could have housing implications, particularly affecting size requirements considering the propensity for multi-generational households within certain ethnic minority groups.
 - Rural Households Qualitative analysis of housing trends in the rural wards in Medway is undertaken using the results of the HNS. This helps to understand variations in rural housing needs compared to urban areas.
- 1.2 The specific needs of each of these groups, together with their potential implications for housing requirements, is based on the analysis of available secondary data, and supported further by the relevant primary qualitative data from the HNS. Full analysis of the HNS results is set out in Appendix 2 of this report.

- 1.3 Due to a lack of robust available data there are certain specific groups that have not been reviewed in this assessment, but are important to identify as they may require consideration in relation to future specific housing requirements. These groups include gypsies and travellers and self-build groups.
- 1.4 The needs of Gypsies and Travellers is considered in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2013) produced by the Salford Housing & Urban Studies Unit.
- 1.5 Self-build groups are difficult to quantify. Medway Council does not currently have a register of possible self-builders and/or sites reserved for self-build but it does intend to address this issue in its forthcoming local plan.
- 1.6 It is also acknowledged that Medway has c.550 Houseboats, the locations of which are shown in Figure 1 below. These households may have specific requirements which differ from other household types within the Authority area, for example relating to access to local facilities and services and the suitability of current locations.





1.7 The current location of canal boat communities may be impacted by any long term plans the Council has for strategic riverside development and redevelopment. This could result in the relocation of canal boat settlements. However, it could also consolidate particular canal boat clusters by improving the range of facilities and services that they have access to, and improving the quality of the local environment for these houseboat residents.

Older Person Households

- 1.8 Ageing population is a national characteristic, and will also be a specific characteristic of population growth over the projection period in Medway, as shown in previous sections of this Report.
- 1.9 Using the demographic baseline scenario (derived from the 2012 SNPP and 2011 HHP detailed), Table 1 shows the age specific change in households over the period from 2012 to 2037. This shows a total growth of 28,699 households over the 25 year period. Whilst there is a projected growth across all age bands, the most significant growth is anticipated in the 65+ age demographic. Growth is particularly marked in the 85+ household age band, which is projected to increase by 7,410 households (154%) over the 25 years from 2012 to 2037, albeit involving fewer households than most other categories in absolute terms. The 75-84 household age band has the second highest predicted growth level at 74%.

Table 1 - Age Distribution of Projected Household Growth (2012 - 2037)

Household Age Band	Demographic Baseline Scenario						
Bunu	Number of households 2012	Number of households 2037	Difference 2012 – 2037	% Change			
0-14	0	0	0	0%			
15-24	4,166	4,387	221	5%			
25-34	16,292	18,343	2,051	13%			
35-44	20,767	23,752	2,985	14%			
45-54	22,333	24,285	1,951	9%			
55-59	9051	10,897	1,846	20%			
60-64	8,815	9,806	991	11%			
65-74	14,438	22,004	7,566	52%			

	107,768	136,466	28,699	27%
85+	2,324	7,410	4,400	15576
	2,924	7,410	4,486	153%
75-84				
	8,980	15,583	6,602	74%

Source: GVA/ ONS SNPP

- 1.10 Ideally, a further table would also be presented here providing a breakdown of the projected households where the head of households is 65+. This would facilitate further in depth understanding of the potential make-up and nature of the ageing population. This data would be set out using the detailed assumptions from the Stage 2 release of the households projections, however to date, only the Stage 1 release is available for the latest household projections which are used in this SHMA (release in 27th February). There is currently no indication of when the Stage 2 release data will be available and therefore cannot be incorporated into this analysis.
- 1.11 The ageing population structure should also be taken into account when considering the form of future housing requirements.
- 35.4% of respondents in the HNS indicated their household includes someone aged 60+ (178 respondents). Of these households, 11.6% live in homes that have been adapted for an elderly member (21) and 0.3% live in homes that have been purpose-built for an elderly member (1). This shows that the majority of households including a 60+ member have not had any special adaptations to accommodate the potential needs of this age group. This could constitute a potential unmet housing need, the possible details of which are considered in further detail below.
- 1.13 The majority of people are likely to continue to live in their family home as they get older. However as revealed from the HNS, the majority of these homes are unlikely to have been built to consider the changing needs of people as they get older. This being said, in many instances simple alterations such as widening doors and providing sloped access will be sufficient to meet a person's needs.
- 1.14 This is supported by findings from the HNS, which identified that of the small proportion of homes containing a 60+ member which have been adapted or purpose-built (11.9% = 22 households), the most common adaptation was to handrails/grab rails (70% = 15 households), followed by bathroom adaptations (43.6% = 9 residents). The least common adaptation was wheelchair adaptations.
- 1.15 Relevant literature discusses the specific design of homes in order to make them adaptable to changing needs. The Lifetime Homes Standard promoted by the

Joseph Rowntree Foundation is an example by which the new developments can be judged adaptable¹.

- 1.16 With the increasing need to house ageing residents living as couples there will be a greater need for 2+bed adapted / custom built accommodation. This is distinct from the traditional forms of retirement accommodation. As a result this should see a move away from bedsit and small 1 bed units to two, or even three bedroom units. This size of accommodation is increasingly viewed as the optimum accommodation size for senior residents which provide flexibility of space to allow for visitors/carers. However, in the social sector it should be acknowledged that under current allocations policy such elderly couples would only be entitled to 1 bedroom.
- 1.17 This should be tempered with policies which encourage the down-sizing of properties in the elderly population. This will release capital for the owners as well as much needed larger properties for other residents, to facilitate flexibility and churn in Medway's housing market. Such a policy will only work if preference is given to housing in areas where people would be willing to live. Practically, as well as financially, this is often in the areas where services are closer and land less expensive.
- 1.18 The report 'Last Time Buyers' by Legal & General, in conjunction with the Centre for Economics and Business Research (CEBR), provides an important insight into the problems being faced by older person households seeking to downsize in the UK housing market, epitomised by the statistic that "almost a third of older homeowners considered downsizing in the last five years; only 7% actually did". The report highlights that "there are 3.3 million homeowners who are aged over 55 and looking to downsize in future". These homeowners termed as 'last time buyers' are calculated to be "sitting on £820 billion of property wealth and 7.7 million spare bedrooms". There a number of reasons why this downsizing is not happening, including "a lack of suitable alternatives, high asking prices and the potential tax burden when they do try to downsize" in combination with personal reasons such as deciding to wait and not wanting to leave their long term home. The lack of suitable alternative housing is considered one of the key factors preventing downsizing from happening, with a requirement for suitable 2/3 bedroom properties near facilities to

6

¹ Lifetime homes incorporate 16 design criteria which can be universally applied to new homes. This lifetime homes standard promotes flexibility and adaptability in living environments for all situations. More information is available at: http://www.lifetimehomes.org.uk/pages/lifetime-homes.html

help alleviate this issue, amongst other tax regime, stamp duty and equity release approaches.²

- 1.19 In terms of the age trends in downsizing, the Legal & General report highlights that whilst it has been shown that a large number of over 55s consider downsizing over 50% seem to decide to wait until they are 70+ to downsize, with 25% deciding to wait until they are 80+.3
- 1.20 Research undertaken by Shelter, detailed in the factsheet 'Older people and housing', indicates that the housing needs of older people can change regardless of specific age trends due to issues including decreasing mobility, illness, and the illness / death of a partner. Such circumstances and changing needs result in either moves to smaller or specialist accommodation, or staying in the same home but with the need for home adaptations, and/or care and support in order to do so.⁴
- 1.21 Respondents in the HNS were asked which older persons' housing options they would consider, if relevant now or in the next 5 years the choices were sheltered accommodation, extra care housing, residential care homes, continue to live in current home with support when needed, buying a property in the open market, renting a property from a private landlord and renting from a Housing Association. Excluding those who would not consider any of these housing options now or in the next 5 years, 'continuing to live in current home with support when needed' was the most popular option considered by 30.8%% of all residents (155 residents). This suggests that elderly residents in Medway may prefer to remain in their home with adaptations and/or support, than move into a form of sheltered accommodation or care home.
- 1.22 As well as adaptations of existing homes and the design of new homes, the ageing population will require coordinated support services. The Projecting Older People Population Information (POPPI) service⁵ provides further information on older persons housing needs at a local authority level. This data has now been updated and is

https://england.shelter.org.uk/ data/assets/pdf file/0013/41440/factsheet older people and housing may 2007.pdf

² Legal & General - Last Time Buyers: http://www.legalandgeneralgroup.com/ pdfs/press-release/LTB Front-cover-Report-Final.pdf

³ Legal & General - Last Time Buyers: http://www.legalandgeneralgroup.com/ pdfs/press-release/LTB Front Cover Report Final.pdf

⁴ Shelter, 2007 - Older people and housing:

⁵ This service is part of the Institute of Public Care and is managed by Oxford Brookes University and supported by Extra Care Charitable Trust. More information is available at: http://www.poppi.org.uk/

- based on updated population projections released by the ONS on 29 May 2014, based on 2012 based population projections. The projections extend to 2030.
- 1.23 The POPPI data identifies that the demographic shift towards an ageing population is likely to lead to an increase in demand for both housing and schemes that offer an element of care.
- 1.24 Table 2 shows Medway's projected needs for social care for older people (65+). This shows that in 2014, 13,277 people aged 65 and over were unable to manage at least one self-care activity on their own. This is projected to grow to 20,686 by 2030 (55.8%). In 2014 16,150 people aged 65 and over were unable to manage at least one domestic task6 on their own. This is projected to grow to 25,256 by 2030 (56.4%). However, growth in both of these social care categories can be accommodated in a person's present environment.

Table 2 - Projected Needs of Older People (65+): Social Care for Medway (2014 – 2030)

Social Care	2014	2015	2020	2025	2030	Change 2014 - 2030
Living in a Care Home (with or without nursing)	994	1,023	1,184	1,458	1,736	742 (74.6%)
Unable to manage at least one domestic task on their own	16,150	16,554	18,869	21,960	25,256	9,106 (56.4%)
Unable to manage at least one self-care activity on their own	13,277	13,607	15,445	17,951	20,686	7,409 (55.8%)

Source: POPPI 2015

1.25 In the HNS, when respondents with a 60+ member were asked about the level of care those older members currently required, the majority indicated no care is required (85% = 152 respondents), 6.2% indicated a requirement for a low level of care (11 respondents), 5.4% indicated a requirement for a medium level of care (10 respondents) and 1.2% indicated a requirement for a high level of care (2 respondents). This does not reflect the requirements identified in the POPPI data due to the small sample size of respondents with a 60+ member living in the household. However, it does suggest there is a greater need for low and medium level care, which could be more easily accommodated within the existing home, than a high

⁶ Tasks include: household shopping, washing and drying dishes, cleaning windows inside, jobs involving climbing, using a vacuum cleaner, washing clothing by hand, opening screw tops, dealing with personal affairs and doing practical activities.

level of care, which may be more difficult to accommodate within the existing home and require alternative forms of housing stock.

1.26 As identified by Shelter, sheltered or retirement housing and retirement villages both offer alternative accommodation options for older people who require more care than they can receive staying in their home, but which do not require moving to a traditional care home, which is a more costly option providing a very high level of care and support and a loss of independence. Generally, sheltered or retirement housing helps residents to retain independence and privacy in their own unit, but with the comfort of an alarm system and communal social areas, as well as meal provision and personal care support in extra care sheltered housing options. Retirement Villages are very similar to sheltered and retirement housing, often in a typical 100 unit community, with purpose built units that often have owner-occupation or part ownership tenure options. In contrast, care homes provide communal accommodation, with a high level of personal and medical care for residents. This type of accommodation is either run by non-profit / charity organisations, or profit driven organisations, with some residents' costs sometimes required to be paid fully or in part by social services and the NHS.⁷

Groups with Specific Support Needs

- 1.27 Whilst there is no single data source which enables a thorough assessment to be made of households with specific needs, this analysis draws on longer-term projections of need from the Projecting Adult Needs and Service Information System (PANSI). This dataset has now been updated using population projection data released by the ONS on 29 May 2014 based on 2012 based population projections. The projections extend to 2030. This analysis is also supplemented by relevant qualitative Housing Needs Survey (HNS) analysis.
- 1.28 The Projecting Adult Needs and Service Information system developed by the Institute of Public Care (IPC) for the Care Services Efficiency Delivery Programme (CSED) provides projections of future numbers of households with physical and learning disabilities. These households, alongside others, are likely to require some form of support within their properties. This therefore provides a useful indication of the levels of demand on existing stock and future requirements to deliver new suitable properties and/or adaptations.

⁷ Shelter, 2007 - Older people and housing: https://england.shelter.org.uk/ data/assets/pdf file/0013/41440/factsheet older people and housing may 2007.pdf

1.29 As shown in Table 3, the POPPI dataset suggests that between 2014 and 2030 the number of individuals aged 65+ in Medway predicted to have learning difficulties is anticipated to rise by 47.1%.

Table 3 - People Forecast to have Learning Disabilities Aged 65+ in Medway (2014 - 2030)

	2014	2015	2020	2025	2030	Change 2014 - 2030
Learning Disability	867	887	995	1,114	1,275	408 (47.1%)

Source: POPPI, 2015

1.30 The PANSI system suggests that the total number of individuals aged 18-64 with a learning disability will marginally reduce in Medway by 7.6% overall, as shown below in Table 4.

Table 4 - Forecast Total Population aged 18 – 64 with Learning Disabilities in Medway (2014 - 2030)

	2014	2015	2020	2025	2030	Change 2014 - 2030
Learning Disability	4,126	4,161	4,276	4,357	4,439	313 (7.6%)
Moderate or Severe Learning Disability	940	948	974	996	1,020	80 (8.5%)
Moderate or Severe Learning Disability & Living with Parent	361	363	367	373	386	25 (6.9%)
Severe Learning Disability	251	253	259	265	273	22 (8.8%)

Source: PANSI, 2015

1.31 PANSI also provides projections on the change in population with both moderate and serious physical disabilities, as shown in Table 5. The PANSI data suggests that the total number of individuals aged 18-64 with a moderate physical disability or a serious physical disability will increase in Medway by 9.2% and 11.6% overall respectively.

Table 5 - Forecast Total Population aged 18-64 with Physical Disabilities in Medway (2014 - 2030)

	2014	2015	2020	2025	2030	Change 2014 - 2030
Moderate Physical Disability	12,883	13,024	13,613	13,988	14,063	1180 (9.2%)
Serious Physical Disability	3,747	3,793	4,009	4,168	4,180	433 (11.6%)

Source: PANSI, 2015

- 1.32 Adults with physical disabilities require different levels of care depending on the severity of their disability. Individuals with a moderate personal care disability can perform tasks such as getting in and out of bed, dressing, washing and feeding with some difficulty. A severe personal care disability can mean that the task requires someone to help.
- 1.33 As shown in Table 6, the number of individuals with moderate or serious personal care disabilities is predicted to increase by 2030 for the 18-64 age range, by 10.6%.

Table 6 - Forecast Total Population aged 18 – 64 with Moderate or Serious Personal Care Disability in Medway (2014 – 2030)

	2014	2015	2020	2025	2030	Change 2014 - 2030
Moderate or Serious Personal Care Disability	7,641	7,733	8,162	8,439	8,448	807 (10.6%)

Source: PANSI, 2015

- 1.34 On this basis it is likely that the overall capacity of suitable stock will need to continue to grow in Medway in order to meet needs, with careful consideration of housing requirements at a strategic level.
- 1.35 The above analysis indicates particular increase in the level of the 65+ population with learning disabilities (projected increase of 47.1% from 2014 2030). This is likely to translate into a requirement for increased in-home care support, as well as increased care home provision where the combination of learning disability and age mean it is no longer feasible for the appropriate care to be provided at home.
- 1.36 Increases are also evident in the level of the 18-64 population with moderate physical disability (9.2% increase), serious physical disability (11.6% increase) and moderate or serious personal care disability (10.6% increase). In housing terms some 18 64 adults

with learning or personal care disabilities may live with older parents, who will absorb their specific housing requirements in the form of an additional required room and potential in home adaptation. However, as many of these adults get older, it is likely that parents / carers may no longer be able to cope with their needs, and that the level of care / support they require may increase, resulting in the requirement for increased care home provision.

- 1.37 In the HNS 20.5% of respondents (103 respondents) indicated that someone in their household has a long term illness, health problem or disability that limits their daily activity or work. Of these respondents, the most common disability amongst adults is 'physical disability' (59% = 88 residents), with 11% being wheelchair users (17) and 48% non-wheelchair users (71). The most common disability amongst children is 'mental health problem' (35% = 3 residents), which has less obvious adaptation implications, followed by 'physical disability: not in a wheelchair' (28% = 2 residents).
- 1.38 This suggests implications for the housing needs of these households in terms of access and/or adaptations, particularly considering the adult disability levels. Only 6.3% of the households with a disabled member have had some form of home adaptation to accommodate their needs, and only 0.3% have had their home purpose-built. This indicates that the majority of disabled people in Medway are not living in a home which has been adapted or designed to suit their needs. This emphasises the potential need for adaptations/purpose-built homes in Medway going forward, particularly considering the forecast increase in physical disabilities from the PANSI data analysed above. However, it should be noted that when all respondents (504) were asked if they require any form of home adaptations in the next 5 years, the majority indicated they did not.
- 1.39 In terms of care, 4.2% of respondents (21 respondents) in the HNS indicated having members of their household who require care or support to enable them to stay in their home. Of these respondents, 47% said they lacked sufficient space to accommodate an overnight carer if needed. This suggests potential implications for the size of home appropriate for Medway residents who require in home care, however not as pronounced as the potential adaptation requirements identified for residents with physical disabilities.

Younger Person Households

- 1.40 Nationally the private rented sector has undergone a period of significant expansion over recent years and now plays an important role in the operation of the housing market offering an alternative to owner-occupation and the social rented sector.
- 1.41 One of the key drivers traditionally for this tenure has been younger households (i.e. households making their first moves to form new households, either post further education or once they have a sufficiently rewarding form of employment). Whilst the private rented sector has expanded beyond this group in recent years to house families and older persons who are being priced out or who are ineligible for other tenures, understanding this particular young demographic is important.
- 1.42 Table 7 shows the age distribution of projected household growth, 2012 2033. The 15-24 age group and the 25-34 age group are anticipated to increase by 5% and 13% respectively.

Table 7 - Age Distribution of Projected Household Growth (2012 - 2037)

Household Age Band	Demographic Baseline Scenario					
	Number of households 2012	Number of households 2037	Difference 2013 – 2033	% Change		
0-14	0	0	0	0%		
15-24	4,166	4,387	221	5%		
25-34	16,292	18,343	2,051	13%		
35-44	20,767	23,752	2,985	14%		
45-54	22,333	24,285	1,951	9%		
55-59	9051	10,897	1,846	20%		
60-64	8,815	9,806	991	11%		
65-74	14,438	22,004	7,566	52%		
75-84	8,980	15,583	6,602	74%		
85+	2,924	7,410	4,486	153%		
Total	107,768	136,466	28,699	27%		

Source: GVA/ ONS SNPP

1.43 As with analysis of Older Person Households, ideally, a further table would be presented here providing a breakdown of the projected households aged 15 - 34. This would facilitate further in depth understanding of the potential make-up and

nature of the younger population. This data would be set out using the detailed assumptions from the Stage 2 release of the 2012 Household projections, however to date, only the Stage 1 release is available for the latest household projections which are used in this SHMA (release in 27th February). There is currently no indication of when the Stage 2 release data will be available, and therefore the analysis cannot be included within this SHMA.

1.44 The age specific in and out migration trends for Medway (as detailed in Section 2) are detailed again in Table 8 below. The highest proportion of in-migration and out-migration occurred in the 16 – 29 age group (both 40%), followed by the 30-44 age group (23% and 22% respectively). This suggests a labour migration driver for these moves in the working age population.

Table 8 - 2013 Age-specific in and out migration into Medway

	In - mi	gration	Out - migration		
Age band	Number of People	% of New Residents	Number of People	% of New Residents	
0-15	1,960	17%	1,760	16%	
16-29	4,710	40%	4,270	40%	
30-44	2,730	23%	2,360	22%	
45-59	1,380	12%	1,340	13%	
60+	870	7%	950	9%	
Total	11,650	100%	10,680	100%	

Source: ONS, 2014

- 1.45 In the HNS respondents were asked whether any members of their household are likely to set up their own home in the next 5 years. 25% of respondents (112) indicated they expected some members to form a new household (16.9% to form 1 household, 7.6% to form 2 households, and 0.6% to form 3 households). Of newly forming households identified by these respondents, 92.7% (140 new households) are expected to be formed by 16+ children living at home with their parents. 46.9% of the identified newly forming households are within the 16-24 age group and 50.3% are within the 25-44 age group.
- 1.46 This suggests a significant proportion of potential newly forming younger person households in the next 5 years in Medway. However, the survey does not identify the certainty in which these new households expect to form, so it cannot provide any

indication of perceived barriers or challenges to achieving this new household formation i.e. affordability, or any specific future housing solutions to address this.

Black and Minority Ethnic Groups

- 1.47 Considering 2011 Census data, minority (non-white) ethnic groups made up approximately 10% of the Medway population. The Asian / Asian British population is the most significant of these groups making up 5% of the population, followed by the Black/African/Caribbean/ Black British group making up 3% of the population.
- 1.48 The proportion of minority groups in Medway's 2011 Census population, benchmarked against the proportions for the HMA, the South East and England & Wales is shown in Figure 2 and Table 9. This shows that the presence of minority ethnic groups in Medway is less pronounced than at a national level, but largely in line with the regional South East Level. It also shows that the proportion of ethnic minorities in Medway is higher than Kent, and the majority of neighbouring HMA local authorities (with the exception of Gravesham and Dartford).

England South East Kent Gravesham Medway Dartford Swale Maidstone Tonbridge & Malling 0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100% ■ Mixed/Multiple Ethnic Groups ■ White Asian/Asian British ■ Black/African/Caribbean/Black British ■ Other Ethnic Group

Figure 2 - Population and Ethnicity for Minority (non-white) ethnic groups (2011)

Source: Census, 2011

Table 9 – Ethnic Composition of population (2011)

	White	Mixed/Multipl e Ethnic Groups	Asia n/Asi an Britis h	Black/Africa n/Caribbean / Black British	Other Ethni c Grou p	Total
England	85%	2%	8%	3%	1%	100%
South East	91%	2%	5%	2%	1%	100%
Kent	94%	2%	3%	1%	0%	100%
Medway	90%	2%	5%	3%	1%	100%
Gravesha m	83%	2%	10%	3%	2%	100%
Dartford	87%	2%	6%	4%	1%	100%
Swale	97%	1%	1%	1%	0%	100%
Maidstone	94%	2%	3%	1%	0%	100%
Tonbridge & Malling	96%	1%	2%	0%	0%	100%

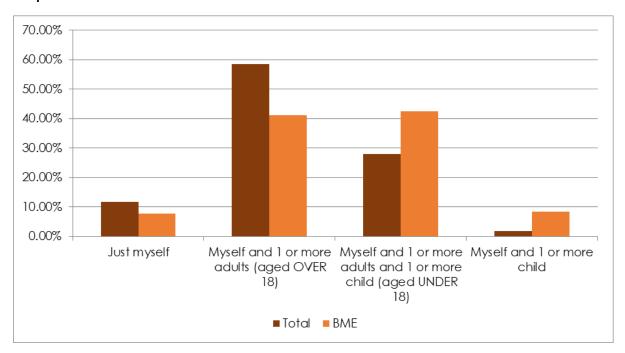
Source: Census 2011

- 1.49 Ethnicity focussed analysis of the HNS results has been undertaken by separating those respondents classified as BME households, and comparing the analysis of these specific households to overall trends. 12.2% of respondents (61 respondents) are identified as being BME households.
- 1.50 The analysis and stock profiles identified in this sub-section reflect the distribution and trends from the 61 BME respondents (12.2%) included in the survey, so will not necessarily apply across the whole authority area. However, it provides a useful indication of the trend that may be observed across the authority.
- 1.51 No definitive recommendations are drawn from this analysis, due to the relatively small sample size reducing its reliability. Any potential future issues or actions identified must be caveated with the reliability of the survey sample size, and should be considered more broadly with the secondary data based conclusions and recommendations.

BME Household Composition

- 1.52 Single person households constitute 7.9% of BME respondents. Households with 1 adult and 1 or more children constitute 8.4% of BME respondents. Households with 2 or more adults (all aged over 18) constitute 41.3% of BME respondents. Households with 2 or more adults and 1 or more children (aged under 18) constitute 42.4% of BME respondents.
- 1.53 Figure 3 below shows this BME distribution compared with all survey respondents. There is variation evident in each household category of the distribution. BME respondents constitute a smaller proportion of single person and 2 or more adult households, and a larger proportion of 2 or more adult and 1 or more children, and 1 adult and 1 or more children households. This suggests that when compared with all Medway households, generally BME households are larger in size, tend to contain more children, and are also likely to have a greater tendency towards accommodating multiple generations.

Figure 3 - Medway Household Composition for BME Respondents and All Survey Respondents

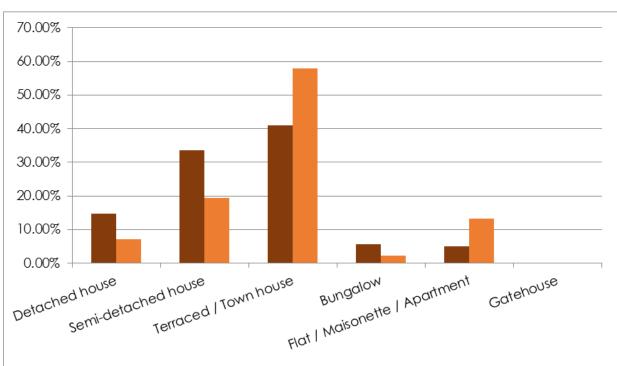


1.54 Of those respondents with 2 or more adults in the household (51 respondents), 50% have 3 or more adults, and 18.1% live with a son, daughter, brother or sister. This provides potential evidence of multi-generation households. This could potentially be caused by affordability issues preventing households from accessing properties that meet their size requirements, and/or the formation of new households. However,

certain ethnic groups often have a greater tendency to form multi-generational households, so affordability may have no influence here. This is explored further below.

Stock Type

- 1.55 As shown below in Figure 4, a higher proportion of BME respondents occupy terraced stock (56%) compared to the proportion occupied by all respondents (41%). A higher proportion of BME respondents also occupy flatted stock (13.2%) compared to the proportion occupied by all respondents (5%). A lower proportion of BME respondents occupy detached stock (7.1%), semi-detached stock (19.4%) and bungalow stock (2.3%) compared to the proportions occupied by all respondents (14.8%, 33.6% and 5.6% respectively).
- 1.56 The comparison of stock type distribution between BME respondents and all respondents highlights the propensity for BME residents to occupy terraced and flatted stock, which tends to be smaller in floorspace terms. When considering this in combination with the analysis of BME household composition, it suggests that these BME respondents may be living in overcrowded households. This is explored further below, when analysing the adequacy of current homes.



■Total ■BME

Figure 4 - Medway Property Type for BME Respondents and All Survey Respondents

Stock Tenure

- 1.1 Figure 5 shows significant distinction in property tenure proportions when comparing BME respondents with all respondents. Only 46.1% of BME respondents own their home (13.2% outright and 32.9% with a mortgage), compared to 80.8% of all respondents who own their home (40.4% outright and 40.4% with a mortgage). The distinction in outright ownership (13.2% of BME respondents compared to 40.4% of all respondents) is particularly significant.
- 1.2 As would be expected considering the differences in home ownership proportions, the proportion of BME respondents renting a home is substantially above that for all respondents. 15.2% of BME respondents are renting from the Council, compared to 5.4% of all respondents, and 33.7% of BME respondents are renting privately, compared to 10.3% of all respondents.
- 1.3 This could reflect affordability issues being faced by the BME respondents, which could tie in with the potential multi-generational households/inability to form new households/ overcrowding identified above.

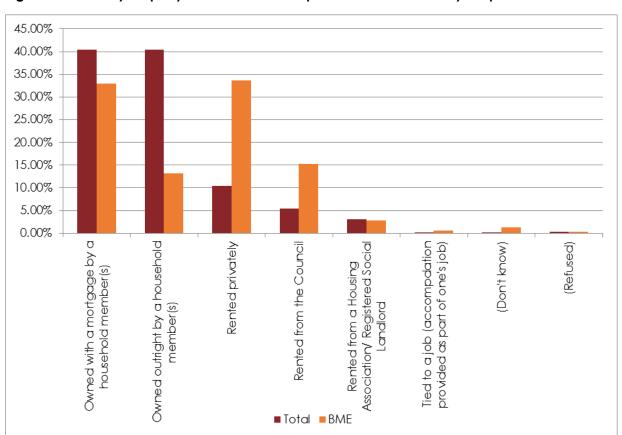


Figure 5 - Medway Property Tenure for BME Respondents and All Survey Respondents

Stock Size

1.4 Figure 6 below shows a very similar distribution of the stock size occupied by BME respondents and all respondents. The only significant difference is in the proportion of 3 bedroom units which are occupied by 47.5% of BME respondents compared to 55.3% of all respondents.

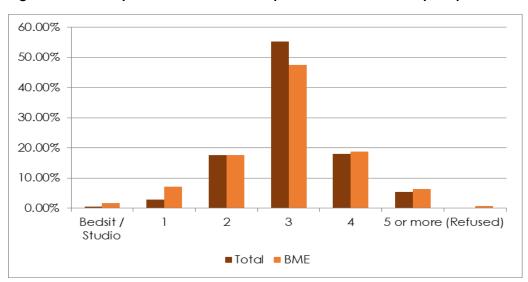


Figure 6 - Medway Stock Size for BME Respondents and All Survey Respondents

Stock Adequacy and Affordability

- 1.5 When BME respondents were asked whether their current home is adequate for their needs, 11.8% indicated their home is not adequate, compared to 7.8% of all respondents.
- 1.6 For the proportion of respondents who indicated their home is not adequate, there is significant variation evident in the reasons stated by the BME respondents compared to all respondents. The most striking distinction, and most relevant considering the other elements of this BME analysis, is that 59.1% of BME respondents find their home inadequate due to an 'insufficient number of bedrooms', compared to only 13.7% for all respondents.
- 1.7 This provides further potential evidence of the overcrowded nature of these BME respondent's households, which emphasises potential affordability pressures acting on BME residents in Medway, and their potential need for larger homes with more bedrooms. However, this must again be caveated by the fact that certain ethnic groups may make a lifestyle choice to live in households containing multiple generations.

- 1.8 Considering affordability more specifically, 64% of BME respondents indicated they receive no help with their housing costs, compared to 54.7% for all respondents. This contradicts the view that BME households are facing greater affordability pressure than other Medway residents. However, 19.9% of BME respondents indicated they meet their rent fully or partly with Housing Benefit, compared to only 8.1% of all respondents. This does suggest potential affordability pressures for Medway's BME residents.
- 1.9 When respondents were asked about their concern with meeting their housing costs, 36% of BME respondents indicated they are 'very concerned' or 'fairly concerned', compared to 18.2% for all respondents. 30.6% of BME respondents indicated they are 'not concerned at all', substantially below this indication from 51.8% of all respondents.
- 1.10 Traditionally BME households face constrained housing choices, which can be due to factors such as comparatively poor labour market position and ties to specific neighbourhoods dominated by certain types of housing. This analysis suggests that affordability may be a more acute issue for BME households than for the White ethnic groups living in Medway, which is potentially contributing to overcrowding. As already discussed, this overcrowding may also be caused by the propensity for certain ethnic groups to have multiple generations living in the same household. Regardless of motivations for this however, there are obvious implications for stock size and type requirements, and overcrowding levels. Therefore, Medway Council should consider potential approaches to increasing BME group access to affordable homes, which are larger in relation to bedroom number.

Rural Households

- 1.11 The HNS was undertaken across all Medway wards, using a weighted sampling approach to replicate the demographic profile of the authority area. Comparative analysis between rural and urban areas has been undertaken by assigning each ward with rural or urban status. The main rural wards in Medway have been identified as Cuxton and Halling, Peninsula and Strood Rural. All other wards are defined as being urban in the context of this analysis. Respondents from the identified rural wards constitute 11.5% of the total survey sample, and urban respondents constitute 88.5% of the total survey sample.]
- 1.12 The analysis and stock profiles identified in this sub-section reflect the distribution and trends from the 504 respondents sampled in the survey, so will not necessarily apply

across the whole authority area. However, it provides a useful indication of the trend that may be observed across the authority.

1.13 No definitive recommendations are drawn from this analysis, due to the relatively small sample size reducing its reliability. Any potential future issues or actions identified must be caveated with the reliability of the survey sample size, and should be considered more broadly with the secondary data based conclusions and recommendations.

Stock Type

- 1.14 As shown below in Figure 7, there is a higher proportion of semi-detached and bungalow stock occupation by rural respondents (47.1% and 8.8%) compared to urban respondents (31.8% and 5.5%). There is a lower proportion of detached, terraced and flatted stock occupation by rural residents (9.9%, 33.1% and 1.2%) compared to urban residents (42%, 15.4% and 5.5%).
- 1.15 The different stock type occupation profiles in the rural and urban areas suggest that certain types of stock may need to be prioritised in these areas in the future, in order to provide residents with equal opportunity and access to the full range of stock options, across the range of price points. For example; it may be beneficial to deliver more terraced and flatted stock in the rural area, which tends to offer more affordable housing options.

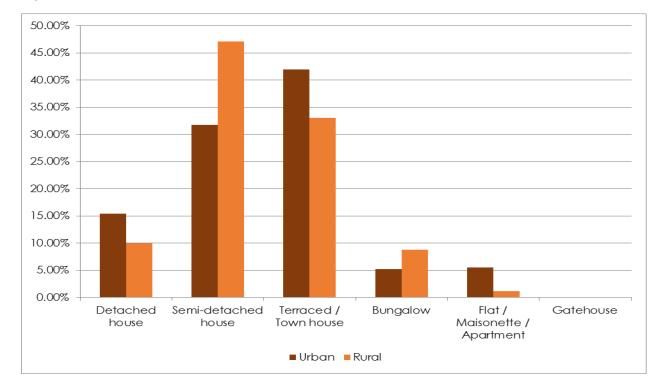


Figure 7 - Medway Property Type by Rural and Urban Location

Stock Tenure

- 1.16 Figure 8 shows very similar trends in home ownership overall; 82.4% in rural areas and 80.6% in urban areas. However, within this, there is a slightly higher proportion of home ownership with a mortgage in rural areas (44.5% compared to 40% in urban areas), and a slightly lower proportion of home ownership without a mortgage in rural areas (37.9% compared to 40.7% in urban areas).
- 1.17 There are lower proportions of private renting and Council renting in rural areas (8.1% and 3.3% respectively) compared to urban areas (10.6% and 5.6% respectively), but a slightly higher proportion of Housing Association renting in rural areas (4.2%) than urban areas (2.9%).
- 1.18 Despite some variation, the tenure profiles for rural and urban areas show a level of comparability, which does not suggest a need to promote any radical tenure variations in the rural or urban parts of Medway going forward.

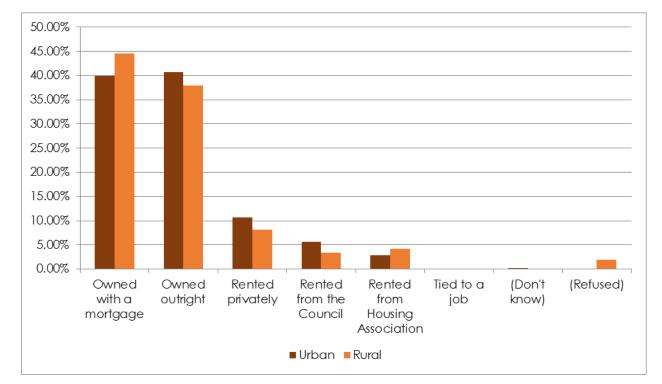


Figure 8 - Medway Property Tenures by Rural and Urban Location

Stock Size

- 1.19 Figure 9 below shows that rural areas have a significantly higher proportion of 4 bedroom stock (31.6%) compared to urban areas (16.4%). Urban areas have a higher proportion of stock by all other bedroom numbers, particularly for 3 bedroom stock which constitutes 47.2% of the rural stock profile compared to 56.3% of the urban stock profile.
- 1.20 There is some variation evident in the stock size profile identified by rural and urban respondents. The most significant finding from these distributions is the significantly higher proportion of 4 bedroom units in rural compared to urban areas. This suggests a potential requirement to increase the delivery of this stock size in urban areas, and control future delivery of this stock size in rural areas. This would increase the similarity in stock size distribution, and therefore the accessibility to the full range of stock sizes, between rural and urban areas in Medway.

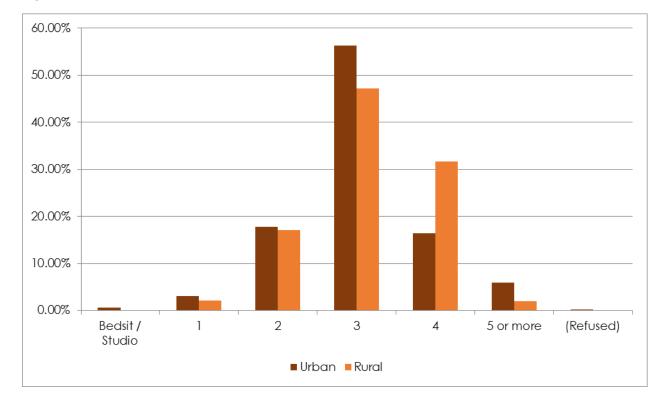


Figure 9 - Stock Size by Rural and Urban Location

Adequacy and Affordability

- 1.21 When respondents were asked whether their current home is adequate for their needs, a much lower proportion of rural respondents indicated their home is inadequate (1.9%), compared to respondents in urban areas (8.5%). However, this is based on a very small sample size, where the 1.9% equates to only 1 rural respondent. This means that it is not possible to compare the reasons for inadequacy between rural and urban respondents.
- 1.22 Despite the small sample size, the significance of the difference in proportion between rural and urban residents suggests that households in the rural parts of Medway may have lesser housing needs than those living in the authority's urban areas.
- 1.23 In terms of affordability, 71.9% of rural respondents indicated they receive no help with their housing costs (rent/mortgage), compared to 52.4% or urban respondents. A lesser proportion of rural respondents indicated they meet their rent in full with Housing Benefit (1%) compared to urban respondents (2.8%), and a lesser proportion of rural respondents meet their rent in part with Housing Benefit (1.2%) compared to urban respondents (6.1%).

- 1.24 When respondents were asked about their concern with meeting their housing costs, a higher proportion of rural respondents indicated they are 'not concerned at all' (35.9%) compared to urban respondents (30.2%). 10.4% of rural respondents indicated they are 'very concerned' or 'fairly concerned' about meeting their housing costs, compared to 10.9% of urban respondents.
- 1.25 This analysis suggests that affordability may be a less acute issue for rural Medway households, than for urban households. The most notable potential housing implications for rural areas in Medway may relate to improving the range of stock type and size distribution to ensure rural residents have the opportunity to access all housing types and tenures.

Key Findings

- 1.26 The purpose of this section has been to consider the housing requirements of specific groups whose housing needs might differ from the majority of the population. The key findings are as follows:
 - Older person households (65+) are projected to grow at a significant level over the projection period; from 27,261 in 2013 to 42,247 in 2033. This is a total growth of 14,986 (55%).

The majority of older person households will continue to live in their family home, possibly with adaptations. The provision of new homes specifically designed to be adaptable will help improve choice and flexibility. This should be complemented with further policy which encourages the downsizing of properties in older age groups

The HNS analysis identifies that the majority of households with someone aged 60+ have not had any special adaptations to accommodate the potential needs of this age group. However, of those that have been adapted for an elderly member (11.6%), the most common adaptations are fairly small/minor, and therefore can be fairly easily accommodated and implemented in the home.

The HNS analysis suggested that elderly residents in Medway may prefer to remain in their home with adaptations and/or support, rather than moving into sheltered accommodation/a care home. This supports the focus on supporting choice and flexibility by facilitating the adaptability of homes where possible.

For Groups with Specific Support Needs, projected increases from 2014 to 2030 in the number of people with learning and physical disabilities and personal care disabilities suggest the likelihood that the overall capacity of suitable stock will need to continue to grow in Medway in order to meet needs. There is projected to be a 47.1% increase in those aged 65+ with learning disabilities, a 9.2% increase in those aged 18-64 with a moderate physical disability, a 11.6% increase in those aged 18-64 with a serious physical disability and a 10.6% increase in those aged 18-64 with a moderate or serious personal care disability. This will require careful consideration at a strategic level.

The HNS analysis suggests potential future requirements for more adaptable and purpose-built stock to accommodate households containing someone with a physical disability. It suggests there is not currently a very high proportion of these households with home adaptations or living in purpose built homes, however this does not establish whether those without adaptations have expressed a desire for them.

• Younger person households (15 – 34) are projected to see a positive growth in the total number of households; 5% in the 15-24 age group and 13% in the 25-34 age group (5%).

Data shows a high proportion of inward and outward migration is amongst younger households. This suggests a labour migration driver for these moves in the working age population.

- It is identified from the HNS that of the households likely to form over the next 5 years, the vast majority (92.7%) are expected to be formed by 16+children living at home with their parents. 46.9% are within the 16-24 age group and 50.3% are within the 25-44 age group. This suggests a significant proportion of potential newly forming younger person households in the next 5 years in Medway. However, the survey does not identify the certainty with which these new households are likely to form, so it cannot provide any indication of perceived barriers or challenges to achieving this new household formation i.e. affordability or appropriate stock availability
- In 2011 **BME (non-white) groups** made up 10% of the population in Medway, of which 5% are Asian / Asian British and 3% are Black/African/Caribbean/ Black British. This proportion is largely in line with the regional South East Level and is higher than Kent as a whole and the majority of neighbouring HMA local authorities (with the exception of Gravesham and Dartford).

HNS analysis suggests that compared to all Medway households, BME households may often be larger in size, contain more children, have a greater tendency towards accommodating multiple generations and may also be overcrowded (in relation to required bedroom numbers). Affordability issues could be preventing households from accessing properties that meet their size requirements, and/or the formation of households, however this can also reflect the propensity of certain ethnic groups for large, multi-generational households. In light of this analysis, potential approaches to increasing BME group access to affordable and more appropriately sized homes should be considered, and explored in further detail.

Rural Households are considered through the primary HNS data. They are
defined as being rural when located within the main rural wards of Cuxton
and Halling, Peninsula and Strood Rural, constituting 11.5% of the total HNS
sample.

Compared to urban respondents, there is a higher proportion of semi-detached and bungalow stock occupied by rural survey respondents, lower proportions of private and Council renting, and a higher proportion of 4 bedroom stock. Rural respondents seemed happier with the adequacy of their current home than urban respondents. Whilst the reliability of this analysis must be caveated by the relatively small sample size on which it is based, it suggests potential rural specific considerations for the Council, such as delivering more terraced and flatted stock to offer more stock variation and affordable choice, and focussing more on delivering smaller stock (1-3 bedrooms)/controlling the delivery of 4 bedroom units to balance the size distribution.

Significantly more rural respondents indicted receiving no help with their housing costs (rent/mortgage), and a higher proportion of rural respondents indicated they have no concern about meeting their housing costs than urban respondents. This suggests that affordability may be a less acute issue for rural Medway households, than for urban households.

1.27 It is evident that the specific housing requirements for older person households, younger person households, specific support needs groups, BME households and rural households, as well as more difficult to quantify groups such as self-build groups, gypsies and travellers and the houseboat community, should be considered in Medway's future housing strategy.



APPENDIX 2

North Kent SHENA

Medway Integrated Growth Needs Assessment - Technical Note

Purpose of the Document

This Integrated Growth Needs Assessment (IGNA) has been prepared as the final stage of the North Kent Strategic Housing and Economic Needs Assessment (SHENA). It draws on the detailed baseline report and the technical information prepared within each evidence base document to confirm the future growth requirements identified for North Kent.

The SHENA's technical workstreams and evidence base reports deal with the future requirements for housing, employment floorspace and retail capacity for both Gravesham and Medway. They provide detailed analysis of key trends and drivers of future growth and use these to provide long term projections of need. Each sets out in detail the method and approach to forecasting and key assumptions made.

In drawing together the technical workstreams the IGNA considers the inter-play between these future needs and the implications these have (in combination) on the scale, nature and location of future growth.

The IGNA also highlights strategic issues and dependencies for realising the scale and nature of growth required within North Kent. It confirms what elements of the identified growth needs are likely to be contingent on other interventions and where they may require active intervention by Gravesham and Medway Councils and their partners

Importantly the IGNA is not intended as a defacto spatial strategy, nor does it model in detail infrastructure requirements or identify alternate sites to meet growth needs. However, it does provide strategic guidance on whether the currently identified portfolio provides the appropriate capacity and appropriate conditions for accommodating growth.

The intention is therefore to identify and coordinate place-specific requirements, highlighting where activities identified within the technical workstreams can be complementary and also considering where they may place competing pressures on land resources.

In coordinating place specific requirements it also provides high level guidance on the shared dependencies and hence potential requirements for intervention, including the approach to future policy development, key infrastructure needs and the approach to development delivery.

Strategic Findings, Key Influences and Drivers

The technical work has highlighted the strategic needs for both local authority areas to grow, driven by a range of internal and external factors. Given the relative scales of both Medway and Gravesham both demonstrate significant growth potential.

What has become clear is that the key driver of future growth will be the significant shift in population and demographic profiles of both Gravesham and Medway. In both areas the population change is driven by a mix of international migration, domestic migration and

(increasingly prominently) natural change - i.e. births outnumbering deaths within the existing population.

At the simplest level this forecast increase in population will drive a need for additional housing provision. This quantitative need will also be accompanied with qualitative needs to meet requirements of a diversifying population base, including specific provision to meet the needs of key sections of the population such as first time buyers, older persons and BME communities. As part of this overall housing need will be a considerable requirement for the provision of affordable housing, again there will be a general need but also specific requirements and products to meet specific needs groups.

Population growth is not solely influencing the need for housing, but is also forecast to have a positive impact on the economic prospects of the North Kent area. The delivery of new residential development through currently planned schemes will link strongly to the existing town centres, enhancing the scale of catchment and potential spend within each centre. Moreover, the diversification of the housing offer and delivery of new, high quality development is attracting a broader mix of residents, particularly linked to enhance commuting options. This not only enhances the spending power of the catchment but also diversifies the range of retail and leisure demand within the centres, creating new trading opportunities.

There are also opportunities for the population growth to drive further economic activity across a range of sectors, both directly through people seeking to locate their business close to where they live and indirectly through increased demand for a range of services. An increase in residents with high skills or active in higher level occupations could also, over time, increase business start-up rates as workers seek to align lifestyle and economic roles. With good connections to a range of markets the town centres in both Medway and Gravesham are likely to offer attractive locations for small businesses.

Population growth isn't likely to be the only driver of economic and employment growth, both areas have a range of existing drivers and potential interventions that are also likely to generate demand in the future.

The existing economic assets of Medway in particular are likely to drive future economic opportunity. The clusters of creative, digital and advanced manufacturing businesses in particular will be key components of the future economy as these sectors are driven by wider economic trends and increasing agglomeration opportunities. The growth in these high added value sectors will also link to key physical assets and opportunities including the Universities at Medway Engineering School and the growth plans for Rochester Airfield.

Economic growth could also be driven by new opportunities created by major investment in new infrastructure. The delivery of a new Thames Crossing alongside existing strategic road connections and accessibility to key markets in London and the South East could enable Medway to play a much enhanced role in the strategic distribution market which has, traditionally, been focussed in other parts of North Kent. A range of sectors could also be boosted by the delivery of London Paramount, largely through increased demand from supply chain activities.

Relationship with 'Neighbouring' Areas

Medway is a dynamic area, its proximity and connections to London mean there are a range of strategic linkages that intrinsically link its success to that of the capital but also mean it shares strategic relationships with neighbouring authorities. These relationships are not linear or consistent between areas or between markets and activities. The inter-actions in the housing

market are not mirrored within economic trends, whilst retail dynamics are particularly influenced by wider regional provision.

Influence of London

As within much of the South East and East of England London has a significant influence on Medway, particularly in terms of population migration and housing demand.

Migration data shows a clear trend for people moving out of London into Medway, indeed four of the top ten total migration 'contributors' to Medway's population are London Boroughs.

However, the inward moves are not reciprocated with similar moves from Medway into London, with only Greenwich appearing in the top 10 out-migration destinations for Medway residents. Indeed when net moves are considered, all but 2 of the net 'contributors' are London boroughs whilst none of the net losses are to London.

Allied to house pricing and market trends these migration patterns provide a clear demonstration of the impact of London's housing pressure, with a west to east migration along the Thames corridor. These factors distort local housing market trends, with a significant decoupling of the usual relationship between place of work and choice of place to live. Price pressures in London, improved rail connections and new housing stock have all contributed to a significant proportion of the population opting to live in North Kent and commute to London.

Housing Market

Leaving aside the influence of London and focusing on more local dynamics the housing market relationships are equally complex.

The definition of a housing market is based on understanding the relationship between local authority areas based on a range of indicators including migration, self-containment, travel to work and commuting patterns and housing market trends. Importantly for Medway there is not a definitive or constant relationship with any single or group of authorities across these indicators, reinforcing the complex relationships that exist. As such it is vital that the definition of the Housing Market Area is based on preponderance of evidence and the most consistent set relationships.

In terms of in-migration at the borough level Medway has the strongest relationships with Maidstone, Swale, Gravesham (all contributing 7% of total growth) and Tonbridge and Malling (contributing 5% of total growth), between them accounting for over a quarter of all who moved into Medway.

For out-migration the strongest relationships again with these four authorities, with 30% of moves out of Medway finishing in either Swale (10%), Maidstone (9%), Tonbridge and Malling (6%) or Gravesham (5%).

Unsurprisingly, based on these trends, the Aggregate Migration Flows (i.e. moves in + moves out - showing the total strength of relationship) again show the strength of the relationship between Medway and its four adjoining authority areas.

The strength of the relationship between these authorities and Medway (from the Medway perspective) is weaker when self-containment is considered, i.e. where the moves between Medway and these boroughs is considered as a proportion of all moves involving these boroughs to locations within the South East, East of England and London.

Overall self-containment in this sense is relatively consistent at c.70%, although the inclusion of Maidstone does weaken the relationship, decreasing the self-containment rate to 68%. Self-containment is highest when all 5 local authorities are considered together, reaching 71%. The inclusion of T&M has a disproportionate effect on the self-containment for the Medway HMA. This is a result of significantly higher levels of internal moves within T&M, which result in a high level of Borough level self-containment.

Given this the strongest self-containment relationship for Medway would appear to be with Gravesham and Swale, with marginally weaker linkages to Maidstone and Tonbridge and Malling.

Travel to work and commuting patterns also reinforce the strength of the relationship between Medway and the adjoining authority areas. The ONS produced Travel to Work Area (TTWA) maps highlight the influence of London, with its TTWA extending out across Kent as far as Medway. However, outside of Gravesham none of Medway's neighbours fall within this area.

The Travel to Work relationship identified by the ONS highlights a number of 'splits' across local authority areas. The Medway TTWA extends south into Maidstone and Tonbridge and Malling, however it doesn't capture the whole of both areas. Much of Maidstone is encapsulated in this TTWA (including the town of Maidstone itself) however only the north of Tonbridge and Malling is included, with the south and west of the borough forming part of the Tunbridge Wells TTWA.

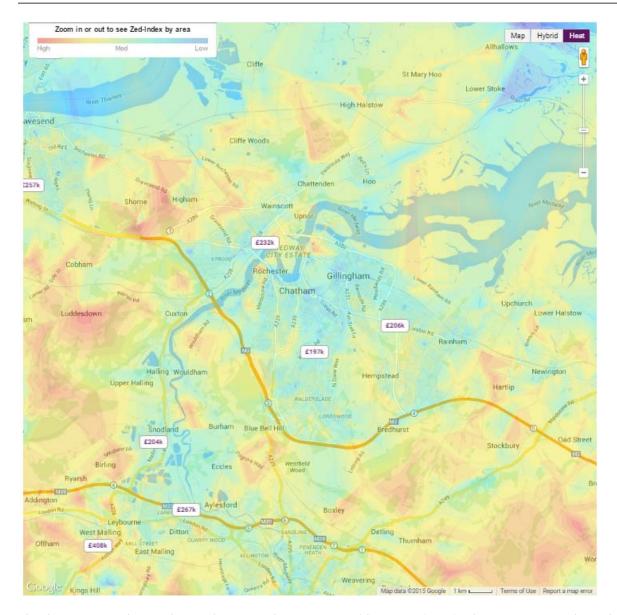
Similarly, whilst the west of Swale (including Sheppey) is within the Medway TTWA the east of the borough towards and beyond Faversham falls within the Canterbury TTWA.

This analysis helps to refine borough level commuting pattern data which highlights Maidstone, Tonbridge & Malling and Swale as the key destinations for Medway residents for work (excluding London) whilst Swale, Maidstone, Tonbridge and Malling and Gravesham are key contributors to the Medway workforce.

Taking all travel to work data together suggests that the strongest relationships are between those parts of neighbouring authorities that are closest to Medway, i.e. the north of Tonbridge and Malling, the north of Maidstone and the west of Swale.

These broad relationships are relatively consistent with prevailing market signals and trends. Whilst there are understandable differences in the detailed levels of demand and values there are relatively clear commonalities in terms of the scale of value change between Medway, Swale, Gravesham and (to a lesser extent) Maidstone over the period 1996-2013. However, Tonbridge and Malling, Canterbury, Dartford and Sevenoaks demonstrated much strong value change over the same period suggesting there are different influences on the market in these areas.

Whilst these trends suggest relationships at the local authority level heat mapping current values helps to understand the current relationships at a sub-authority geography.



The heat map above shows the complex pattern of house prices in the area around Medway. Areas of high value tend to be clusters in two locations. Firstly in rural areas where properties tend to be larger and set within protected environments such as the AONB values are significantly higher than most urban areas. Secondly values are also higher in urban areas where there are clusters of new development (such as Chatham Maritime) or are close to stations on the North Kent Line.

Taking into account these fluctuations values are relatively closely related, or lying within similar value bands, for much of the area north of the M20 and even as far as the London-Maidstone rail line that runs through West Malling. South of this values become consistently higher and therefore have little or no relationship to predominant value bands in Medway.

Given all of these migration, travel to work and market indicators there is clearly a consistently strong relationship between Medway, Gravesham, Swale, Maidstone and Tonbridge and Malling which suggests these should form the Housing Market Area.

However, it needs to be recognised that whilst there are strong relationships these are not consistent across full local authority areas. Indeed, where data is available at a sub-authority

level a clear pattern emerges that indicates the core relationships area with only parts of Swale, Maidstone and Tonbridge and Malling.

For Swale the relationship is strongest in the west, not extending much beyond Sittingbourne which itself (as suggested in the Swale SHMA) has its own identity but still has key links to Medway. For Tonbridge and Malling the relationship is likely to be only with those areas to the north of West Malling and East Malling, albeit there are functional economic relationships with Kings Hill. For Maidstone again the strongest relationship is with the north of the borough, however again there are functional relationships between Medway and Maidstone town centre.

Overall, given the limitations of some data we would define the HMA as the five local authorities of:

- Medway;
- Gravesham;
- Swale;
- Maidstone; and
- Tonbridge and Malling.

However, we would consider the core relationships to cover a more focussed area, albeit this cannot be identified consistently across all datasets.

Retail

The other key regional linkages are within the retail sector where the Kent-wide hierarchy of centres is having a significant influence on the comparison goods offer within Chatham in particular.

Estimates within the retail study suggest that 60% of comparison goods expenditure by Medway and Gravesham residents is lost to centres outside of Medway, with Bluewater drawing the single largest amount, with almost 25% of all expenditure in Medway and Gravesham going to Bluewater, more than Gravesend and Chatham town centres combined.

However, expenditure is not solely lost to Bluewater, with significant shares lost to Maidstone, in particular to the town centre and some of the out of town retail parks in the north of the borough including Aylesford and more recently, Eclipse.

Spending in the leisure sector is also significantly influenced by the offer in other local authority areas and London. A significant share of spending on arts, dining and other entertainment in particular are lost to other locations, with dining in particular lost to Maidstone and Bluewater, suggesting some opportunities for the future for growth within Medway.

The Long Term North Kent Growth Requirements

The technical workstreams identified positive opportunities for growth across all sectors, with a need for new housing, employment land and retail floorspace being clearly identified. Full methodological explanations, data sources and key assumptions are set out in each report.

At the headline level this indicates the following requirements over the projection period (2012 2037):

Table 1 - Identified Growth Requirements

		Medway
Housing (number of dwellings)	OAN	32,025
2012 to 2037	Affordable	17,389
Employment (sqm land	Office	50,152 - 51,967
requirement)	Industrial	163,198 - 163,914
2012-2037	Warehousing	174,235 - 175,907
Retail (sqm floorspace	Convenience	10,500
requirement)	Comparison	34,900
2015-2031		

N.B. Retail figures extend to 2031 due to modelling limitations beyond this period

This level of future requirement places clear pressure on land resources, requiring significant capacity to be provided to accommodate growth both in terms of its scale but also the nature and range of opportunities presented. A diverse portfolio of sites will be critical in order to provide a mix of housing types, accommodate the full range of employment opportunities and deliver additional retail space in locations where it will be successful.

Medway 'Plan Period' Growth Requirements

The figures presented above provide a long term view of growth requirements based on the full available projection period for each use. However, currently the preparation of the new Local Plan period for Medway is focussed on understanding and appropriately planning for growth over a shorter period to 2035.

To enable a clearer understanding of need over this period, and to provide a consistent and comparable set of requirements to support the preparation of the Local Plan, the table below sets out the housing and employment land requirements for the Plan Period from 2012 to 2035.

Given the nature of retail need forecasting and its reliance on a number of inter-linked variables it is not possible to forecast needs over the longer term with any degree of certainty, as such the projections presented run to 2031.

Table 2 - Identified Growth Requirements

		Medway
Housing (number of dwellings) 2012-2035	OAN	29,463
	Affordable	17,112
Employment (sqm land	Office	49,943
requirement)	Industrial	155,748
2012-2035	Warehousing	164,263
Retail (sqm floorspace	Convenience	10,500
requirement) 2015-2031	Comparison	34,900

The Existing Capacity

Both Gravesham and Medway have a number of sites identified for growth and development. A significant proportion of these are brownfield opportunities, principally within the existing urban areas and are a legacy of the retrenchment of major industrial and military activity within the area. However, there are also opportunities for development outside of these, with a small number of 'greenfield' sites identified.

Medway are currently undertaking a Strategic Land Availability Assessment (SLAA) that will identify the key future sites capable of meeting the identified demand. There is also significant capacity identified within sites that benefit from existing planning permission, either as an outline or detailed consent. This permitted pipeline is shown below.

Table 3 - Development Pipeline with Planning Permission

	Housing Capacity (Units)	Employment Capacity (sqm)	Retail Capacity (sqm)
Medway	6,012	732,257	41,580
Lodge Hill	5,000	44,100	5,315

Source: Medway Council Monitoring Data, 2015

Medway's supply position in that there is a significant land supply already identified and permitted that offers significant capacity to accommodate development. Comparing projected demand and current supply suggests that:

- There is currently permitted (undeveloped) capacity to meet c.20% of the objectively assessed housing need. This rises to 37% if Lodge Hill is included;
- There is potentially an over-supply of B class employment floorspace;
- There is a small oversupply of retail floorspace.

However, these sites were identified under significantly different demand conditions and therefore alongside the potential quantitative need for housing there may be an ongoing qualitative need for other land capacity.

This is particularly true for B class employment where much of the land capacity (over 50%) lies within large industrial and distribution sites within the Hoo Peninsula, this provides limited capacity and choice for occupiers seeking other forms of space or to locate within the core urban area.

Similarly there are likely to be qualitative requirements for retail space, both to diversify the nature of units provided within the town centre but also to provide a convenience role and leisure offer within major new development sites.

Emerging Specific Growth Needs

Building on these quantitative and qualitative requirements set out above the technical work has identified the following specific qualitative needs.

Specific market and affordable housing to meet the needs of key groups in and of themselves and to create greater movement within the market:

- Older Persons particularly good quality smaller units to encourage downsizing. The
 housing needs survey suggests few residents are in need of supported or extra care
 housing, although this may be a more hidden need.
- Young first time buyers again focused on good quality smaller units, with the potential
 to locate within key urban areas. This may also require some level of purpose built
 student houses.
- BME groups with a need for larger properties to accommodate multi-generational homes.

In employment terms, the current portfolio is unlikely to meet all qualitative requirements with a need to diversify the offer to help better align demand and supply and continue the economic evolution under way in the borough. To secure greater knowledge economy activity a focus will need to be placed on delivering well serviced, flexible office spaces close to town centres with good quality ICT connections. There will also be a need to ensure high quality 'hybrid' industrial space can come forward to support advanced manufacturing activity, this may need to extend beyond the space provided at Rochester Airfield.

Key steps also need to be taken to address the current under-trading of Chatham town centre. The nature of the stock offer is a key challenge with other centres (such as Hempstead Valley) showing that if good quality modern format stores can be provided there is demand from retailers. Enhancing the wider offer of the town centres will also help their vitality, particularly if greater leisure uses can be introduced.

Conclusions

In drawing together the findings of each technical workstream there are some key inter-linked themes that are beginning to shape the understanding of the qualitative requirements and potential geographic focus or priorities for growth in Medway.

In planning new capacity and making site allocation decisions the following factors should be considered:

Their ability to assist in the reinvigoration of the Town Centres

This should include the capacity to update and expand the retail offer through new, modern floorspace capable of accommodating new store formats. This should also seek to deliver more dining and leisure space.

The delivery of new town centre living options and new forms of workspace within Chatham in particular will help to diversify the town's offer and also attract a wider customer base for retailers. Schemes will need to be of good quality to attract residents and employees with higher disposable incomes that can be captured in the town centre and support a broader retail offer.

Moving forward major brownfield sites

Medway has a strong track record in delivering the regeneration of major brownfield sites, with major new development along the riverside at Chatham and Gillingham in particular helping to shift perceptions of both areas.

Looking forward meeting future housing delivery will require this momentum to be maintained and indeed increased to create new high quality residential developments to accommodate a

growing population. Where possible these should be well connected and integrated with the existing town centres, however they should in and of themselves provide a mix of uses and activities that complement the residential offer. This should include small convenience retail and potentially new workspace.

The provision of a diverse portfolio of sites

Whilst the major brownfield sites are a major part of the future supply they are complicated and expensive to develop and in many parts of the area this challenges development viability. Therefore it will be risky for the majority of supply to lie within large, complex sites and a mixed portfolio will be needed to support delivery in the short, medium, and long term. This identification of a portfolio of sites will be helped by the identification of some early win sites to demonstrate the market in some areas.

Whilst there needs to be a key focus on the reinvigoration of the town centres and delivery of sustainable development locations that maximise existing infrastructure the Housing Needs Survey demonstrated the ongoing desire for people to also to be able to access housing in rural areas. Given existing provision the delivery of a range of properties types, including some smaller units will help address these needs and also allow the growth and diversification of rural communities, helping to underpin their wider offer.

In employment terms there will be a need to secure a range of sites that provide capacity where the market is attracted. This will be different for different sectors and therefore require a mix of town centre sites, locations with good access to the strategic road network and large capacity industrial sites. Whilst the quantitative need may be able to be met it is equally important to ensure qualitative needs and choice are also provided for.

APPENDIX 3

Objectively Assessed Housing Need Extract – Draft SHMA September 2015

1

1. Objectively Assessed Housing Need

- 1.1 This section of the report examines population and household projections with a view to considering what constitutes objectively assessed housing needs for Medway.
- 1.2 The NPPF and PPG sets out a detailed methodology for undertaking an assessment of housing need in an area. GVA has summarised some of the key requirements and statements from the PPG which provide some context as to the required approach.

National Planning Policy

- 1.3 As described in the introduction to this report, the NPPF describes the policy principles for OAN at paragraph 47 when it states local planning authorities should "use their evidence to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" (GVA emphasis).
- 1.4 The NPPF mandates the integration of different strategies and land uses including requiring planning authorities to "ensure that their assessments of and strategies for housing, employment and other uses are integrated and that they take full account of relevant market and economic signals" (GVA emphasis).¹
- 1.5 "Local planning authorities should [...] assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.

 The [...] Assessment should identify the scale ... of housing ... that the local population is likely to need over the plan period which:
 - meets household and population projections, taking account of migration and demographic change;
 - addresses the need for all types of housing, including affordable housing ...; and
 - caters for housing demand and the scale of housing supply necessary to meet this demand." (GVA emphasis)²
- 1.6 Local Planning Authorities are required to have a clear understanding of housing needs in their area which they should ascertain through the preparation of a Strategic Housing Market Assessment.
- 1.7 More widely, the NPPF states that Local Plans and authorities should make every effort "to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth" (GVA emphasis).³

¹ NPPF, paragraph 158

² NPPF. paragraph 159

1.8 It is clear from the extracts above that full objectively assessed need refers to both the need for market and affordable housing and requires a positive approach which responds to both demographic needs and to opportunities for economic growth.

National Planning Guidance

Further to the NPPF's more general prescriptions, the PPG sets out a detailed methodology for undertaking an assessment of housing need in an area. This assessment has summarised some of the key requirements and statements from the PPG which provide some context as to the required process and aid in the later assessment of the Council's approach to identifying housing needs.

What is housing need?

1.9 The primary objective of an assessment of housing needs is to identify the future quantity of housing needed.⁴

"Need for housing in the context of the guidance refers to the scale and mix of housing ... that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand" (GVA emphasis).⁵

"The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure, or environmental constraints" (GVA emphasis).⁶

What area should be considered?

The spatial geography of the assessment should be led by functioning housing market areas. The PPG states that:

"A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work [...] The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority

³ NPPF, paragraph 17

⁴ PPG Ref. ID 2a-002-20140306

⁵ PPG Ref. ID 2a-003-20140306

⁶ PPG Ref. ID 2a-004-20140306

administrative boundaries. Local planning authorities should work with all the other constituent authorities under the duty to cooperate".⁷

What should the assessment include?

- 1.10 The PPG states that the starting point for an assessment of housing need should be the government published household projections.⁸ Adjustments should then be made to understand and address:
 - the impact of past demographic and migration trends on those projections.9
 - future labour requirements of the area and whether there is likely to be a shortfall of working persons.¹⁰
 - affordability and housing market demand.¹¹
- 1.11 An assessment should also consider the full need for affordable housing.¹²
- 1.12 Household projections are published biennially and are based on historic data from the labour force survey, Census and mid-year population estimates ("MYE"). With regard to population they project population growth from the last 6 years. They are only as useful as the trends on which they are based are indicative of future trends. It is therefore important to assess whether other demographic issues have affected the projections. It is also useful to look at longer term trends to understand how demographic change has shifted over time.

With regard to future labour force needs, the PPG states that "Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area. Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems." (GVA emphasis).¹⁴

1.13 As set out above, indicators or signals of how the housing market is performing should also be assessed. The PPG states that "Appropriate comparisons of indicators [of

⁷ PPG Ref. ID 2a-010-20140306

⁸ PPG Ref. ID 2a-015-20140306

⁹ PPG Ref. ID 2a-017-20140306

¹⁰ PPG Ref. ID 2a-018-20140306

¹¹ PPG Ref. ID 2a-019-20140306

¹² PPG Ref. ID 2a-022-20140306 to PPG Ref. ID 2a-029-20140306

¹³ PPG Ref. ID 2a-017-20140306

¹⁴ PPG Ref ID: 2a-018-20140306

demand] should be made. This includes comparison with longer term trends in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections."..."The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be" (GVA emphasis).¹⁵

How should 'back-log' be dealt with?

1.14 The PPG cautions that past trends – including past supply, economic conditions and worsening affordability - may have artificially suppressed factors such as migration and household formation and therefore could affect future projections. The guidance states:

"The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply." (PPG Ref. ID 2a-015-20140306).

Affordable housing and wider needs

- 1.15 The PPG states¹⁶ that affordable housing needs should be considered in the context of the overall mix of market and affordable housing likely to be delivered in the area. Specifically "an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes".
- 1.16 It should be highlighted that this stipulation does hint at affordable housing adjustments being a 'policy-on' consideration as it describes likely 'delivery' considerations. However, the Planning Advisory Service's Technical Advice Note 'Objectively Assessed Needs and Targets' states that affordable housing needs should be a consideration when defining OAN and if the total OAN cannot deliver sufficient affordable housing to

¹⁵ PPG Ref ID: 2a-020-20140306

¹⁶ PPG Ref ID: 2a-029-20140603

¹⁷ PPG Ref ID 2a-029-20140306

¹⁸ Figure 3.1 and Chapter 7 of this Guidance

meet needs, consideration should be given to increasing it.¹⁹ Specific reference is made to accommodating the needs of concealed and homeless households.

Summary

- 1.17 In summary, an assessment of housing needs must be objective and must identify demand and therefore housing need in full. It should not seek to include metrics or measures which apply restraint in any way. It should be a positive exercise which responds to future economic change, affordability and affordable housing needs. Four broad stages to this work have been identified as required in assessing OAN;
 - Identifying the basic geographic unit through which housing needs are understood (typically the HMA or local planning authority area) (see Section 2);
 - 2. Assessing household projections (the starting point) against other consistent demographic evidence to understand the extent to which they are up to date and appropriate indicators of future housing needs;
 - 3. Understanding whether adjustments need to be made to take account of labour force requirements and affordability (market signals); and
 - 4. Understanding affordable housing needs in full.

Latest Projections

- 1.18 The latest set population projections available from the Office of National Statistics (ONS) are the 2012-based Sub-national Population Projections (SNPP). The 2012 SNPP projects forward assumptions on fertility, mortality and migration rates based on trends from the previous five / six years starting from the base year of 2012.
- 1.19 The SNPPs are not forecasts and take no account of future government policies, changing economic circumstances or the capacity of an area to accommodate the change in population. They provide an indication of the future size and structure of the population if recent demographic trends continue. Projections become increasingly uncertain the further they are carried forward, and particularly so for smaller geographic areas such as districts.
- 1.20 Population projections provide a basis through which to understand future population change. Household projections provide a basis through which to understand how that population change affects household formation. This is because as a population changes (both in terms of size and structure) the number of dwellings needed to house that population also changes. For example, a population with a high proportion of

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¹⁹ Planning Advisory Service Technical Guidance on OAN http://www.pas.gov.uk/documents/332612/6363137/Objectively+Assessed+Need+and+Housing+Targets/

people in their late teens is likely to need less housing than a population with a high proportion of 60 year olds. This is because the former demographic often lives with parents or in shared houses whereas the latter is more likely to live in couples or alone. These characteristics shift over time as a result of cultural changes in the population. For example, divorce amongst 30 and 40 year olds has been increasing over time which has increased the need for housing in this demographic as when a family or couple splits up you have two households to accommodate rather than one. The probability of a person being the head of a household is called the Household Representative Rate (HRR). The greater the HRR for a given population, the more houses that will be needed to accommodate it.

- 1.21 The household projections contain assumptions by age and sex about how HRRs will change over time. These assumptions are built up through analysis of the Census and Labour Force Survey. The latest household projections are the 2012 Household Projections (HP).
- 1.22 Table 1 provides an introduction to the different projections and the assumptions they use to projection population and household change.

Table 1 - National population and household projections

Projection	Features	
2012-based SNPP	 Uses demographic trends from 2007 to 2012 Long-term projection from 2012 to 2037 Average annual population growth between 2012 and 2037 for Medway= 2,344 people 	
2012-based household projections	 Uses the 2012-based population projections as a base Household formation rates trended from 1971, 1981, 1991, 2001 and 2011 Censuses and Labour Force Survey data. Long-term projection from 2012 to 2037 Average annual household growth between 2012 and 2037 for Medway = 1,270 households 	

Source: ONS SNPP and HP

Population Projections

- 1.23 The latest official projections come from the ONS 2012-based SNPP. 2012-based SNPP anticipates the population of Medway will increase by 21.8% (58,600 people) to an overall population of 326,800 people in 2037. In 2012, Medway accounts for 18.1% of the total Kent county population; by 2037 this is projected to increase to 18.3%.
- 1.24 Figure 1 provides a comparison between the latest 2012-based SNPP and previous 2011-interim, 2008-based and 2006-based SNPP for Medway.

1.25 It is clear that recent projections (2012 and 2011-Interim) are projecting higher growth overall. Furthermore, the starting point shows that historic projections underestimated the level of population that would be in the authority area in 2011 (this has been subsequently revised following the 2011 Census). The 2012 SNPP anticipate the population of Medway to grow at a much faster rate than previously assumed under the 2006 and 2008 projections (but in broad alignment with the 2011 projection); equating to an average annual population growth of 2,344 people over the period 2012-2037.

340
320
(\$\sqrt{9}\) 300

280

240

220

\$\tilde{1}\tilde

Figure 1 - Comparison of recent and historic population projections for Medway

Source: ONS SNPP Series

Households

- 1.26 Household projections (HP) provide quantitative and qualitative assumptions about how the population of a given area will form households over the future period. Household projections are an amalgam of three sets of statistics; population projections (SNPP), HRR projections and projections of the level of communal establishment population (i.e. students in halls, prisoners, army barracks).
- 1.27 In Medway, the 2012 HP anticipate a 29% increase to a total of 139,900 households, or an annual average of 1,270 households.
- 1.28 Figure 2 provides a comparison between the previous 2006, 2008, 2011-interim and 2012 HP for Medway between 2012 and 2037 (with variation in the dates covered). The 2008 and 2006 based projections follow a depressed trajectory compared to the 2011 and 2012 projections, with almost 10,000 households' difference by 2035. This indicates

that over time population growth has increased and the projections have been revised to show higher levels of growth.

Figure 2 - Household projections series over time



The OAN "Starting Point"

- 1.29 The starting point for an assessment of housing need is the 2012 Household Projections. Table 2 sets out the 2012 HP for Medway and compares them to past household growth. It is clear that future household growth is projected to be significantly higher than has been observed historically.
- 1.30 Between 1992 and 2002 household growth was 599 per annum (pa) in Medway. Over the period 2002 to 2012, this had increased by 36%. Projected household growth (2012 to 2037) is anticipated to be 56% higher than household growth in the preceding decade (2002 to 2012).

Table 2 - Household growth estimates and projections

Area	Household Growth Per Annum			
	1992 to 2002 2002 to 2012 2012 to 2037			
Medway	599	816	1,270	

Source: DCLG 2012-based Household Projections

1.31 There are a number of reasons for increasing annual household growth over time. Firstly, annual population growth, as a result of higher levels of migration, has increased over time resulting in greater projected household and population growth in the future (see Figure 3).

- 1.32 Notably, Medway observed low population growth over the early part of the 2000s and high growth in the latter part of the 2000s. With the latest household projections projecting forward the 6 years of population data between 2007 and 2012 (which saw significant growth through in-migration, Figure 3), it is understandable why they would be projecting such significant levels of population and household growth going forward.
- 1.33 The second reason for higher levels of projected household growth is the ageing population. As a population ages, the average household size becomes smaller because statistically older people live in smaller households. This means that for the same level of population growth, an older population requires more housing than a younger population. Between the 2001 and 2011 Census, the over 65 population grew by 23% in Medway compared to 6% total population growth. This shows that there has been a disproportionate level of growth in older persons which, as discussed above, will have an effect on household formation.
- 1.34 Thirdly, it follows that as an area becomes more populated, the level (not proportion) of population and household growth grows with it, albeit there is not an exact proportional relationship.

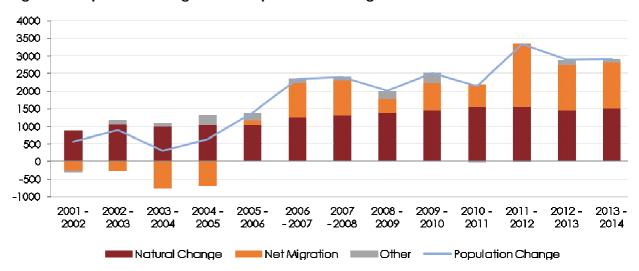


Figure 3 - Population change and components of change between 2001 and 2002

Source: Mid-Year Population Estimates

Since the 2012 SNPP was published, ONS has 'estimated' the 2013 and 2014 population using a range of administrative data to understand migration and natural change. This information is not contained within the latest population and household projections. GVA, using Popgroup software has been able to include this updated information within the demographic projection. When the updated projection is compared to the 2012-based HP for 2012-37 (Table 2). It shows the impact of this new base population information; a slight decrease in annual growth – see Table 3.

Table 3 - Annual Household Growth 2012-37 updated to reflect 2013 and 2014 mid-year estimate

Area	Household Growth Per Annum (2012 – 2037)	
Medway	1,235	

Source: Mid-Year Population Estimates, Popgroup, GVA

- 1.36 As demonstrated by Table 2 and Figure 3, annual population and household growth has increased over time. Indeed, Figure 3 provides more year on year detail showing that this trend continued throughout the 2000s with the highest levels of growth observed in the latter part of that decade and the next decade (2011 to 2014). As discussed above, the 2012 HP include trends principally from this period of high growth. It is therefore appropriate to consider longer term trends to ensure ephemeral phenomena and other short term anomalies are accounted for.
- 1.37 GVA has therefore utilised data from the 2004 to 2014 mid-year population estimates (MYE) which provide detailed migration data by sex and single year of age over these ten years. Table 4 shows the level of household growth forecast if long term migration trends continue from this period. Longer term trends indicate a fall in household growth of 7% in Medway compared to the shorter term trends espoused by the 2012 HP.

Table 4 - Annual Household Growth 2012-37 updated to reflect long term migration rates

Area	Household Growth Per Annum (2012 – 2037)	
Medway	1,148	

Source: Mid-Year Population Estimates, Popgroup, GVA

- 1.38 GVA has also looked at the effect that un-attributable population change ('UPC') has had on past migration. UPC is the difference in 2011 between the population estimates built up from the 2001 Census (using birth, death and migration data) and that recorded by the 2011 Census. It is likely that at least part of UPC is attributable to migration being over or under-recorded. The effect of adjusting past migration to take account of UPC is twofold. Firstly, in Medway, the Census showed that migration was likely underestimated to some degree²⁰. However this was not uniform across all age groups with UPC showing a particular under-recording of children. This is important when thinking about housing needs because younger people live in larger households (either as a family or with friends).
- 1.39 Table 5 shows the age differentiation of UPC from 2001 to 2011.

 $^{^{20}}$ It is not possible to say by exactly how much as there is insufficient information to attribute UPC to migration, natural change or errors with the Census.

Table 5 - The effect of UPC between 2001 and 2011

Ages	Number of people UPC		
0-15	1016		
16-24	-9		
25-44	-321		
45-64	2		
65+	96		
Total	784		

Source: Mid-Year Population Estimates, Popgroup, GVA

NB Positive number means the MYE were less than Census, a negative number means the converse

1.40 When past migration is adjusted to take account of 100% of UPC it has the effect of reducing household growth further to 1,124 dwellings per annum in Medway as despite the UPC increasing net migration overall, it actually leads to a younger migration flow which reduces household formation. This is set out in Table 6.

Table 6 - Annual Household Growth 2012-37 updated to reflect long term migration rates and UPC

Area	Household Growth Per Annum (2012 – 2037)	
Medway	1,124	

Source: Mid-Year Population Estimates, Popgroup, GVA

Summary

1.41 Overall therefore the latest demographic data projects household growth of between 1,124 and 1,270 in Medway. Longer term trends would seem appropriate given the significant increases in growth which have been observed in the short term which appear to break from longer term trends. If longer term trends are used, i.e. from the 1990s, this reduces household growth further (Table 2), however, there is insufficient quality of data to model the detailed implications of this for household growth. It would also seem appropriate to consider the effect of UPC in the trends, which, as set out above, reduces annual household formation to the lower end of the range; although there is insufficient information to assess the full impact of UPC on migration.

Converting Household growth to dwelling growth

1.42 To convert household growth to dwelling growth an allowance for vacant properties and second homes is required. To do this GVA has looked at the DCLG Live tables and 2001 and 2011 Censuses. A long term vacancy average (12 years) was taken, which equates to 3.6% in Medway. This results in the following dwelling growth, per annum, between 2012 to 2037:

Medway

- 2012 Household Projections; 1,317 dwellings per annum
- 2012 Household Projections (updated to reflect 2014 MYE): 1,281 dwellings per annum
- Long Term Migration: 1,191 dwellings per annum
- Long Term Migration UPC: 1,167 dwellings per annum

Demographic needs from wider area

- 1.43 To understand the demographic needs of the Medway Housing Market Area, GVA has modelled the future dwelling requirements of Gravesham, Maidstone, Swale and Tonbridge and Malling on the same basis as Medway. This will provide the Council with an understanding of wider housing needs for the purposes of duty to cooperate discussions across the sub-region. Using the same process as that explored above, the following results are produced see Table 7.
- 1.44 Overall, the latest demographic data projects dwelling growth of 3,885 to 4,066 dwellings per annum across the HMA. Longer term trends and some account of UPC would again seem appropriate. This would point to a figure towards the bottom of the range.

Table 7 - Household Projections range across the wider HMA

Area		Growth Per Annum (2012 – 2037)	
		Households	Dwellings
HMA (including Medway)	2012 Household Projections (updated)	3,921	4,066
	Long term migration	3,833	3,975
	Long term migration (UPC)	3,745	3,885

Economic projections

1.45 The PPG requires an OAN to include an assessment of future employment growth. GVA has utilised employment growth estimates and forecasts from Experian Local Market Forecasts (Q1 2015). These forecasts provide an indication of the level of job growth

likely to take place in the district. This is then translated into household growth estimates by reviewing the current and projected relationship between employment and local labour force.

- 1.46 Figure 4 sets out past and future employment growth in Medway based on the standard Experian forecasting model.
- 1.47 This model combines a range of data to inform the employment growth projection including current employment shares by sector, national growth prospects of sectors and historic performance of sectors. It therefore gives an indication of which sectors are likely to grow and by how much. The forecasts represent an estimate of 'business as usual' growth out with any major regeneration, economic development infrastructure or other intervention that may impact business growth. The dotted line delineates the employment estimate from the employment forecast.
- 1.48 Employment growth in Medway has been tumultuous, with a period of strong growth over the late 1990s and early 2000s, a period of slower employment growth in the 2000s and a period of recession in the late 2000s. Between 1997 and 2014, annual employment growth in Medway was 0.48%.

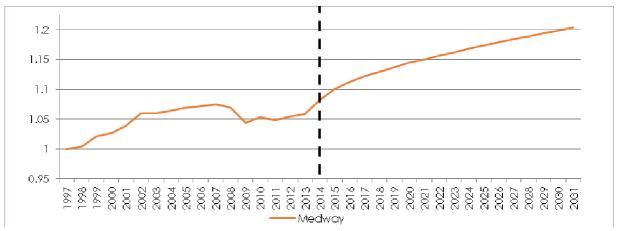


Figure 4 - Employment growth (workforce jobs) indexed to 1997

Source: Experian

- 1.49 GVA has undertaken a number of economic forecasts, looking at a range of options for future employment growth in Medway. The Medway Employment Land Needs Assessments sets out detail of the economic scenarios, however to summarise they are:
 - Sector Growth Scenario this assesses the economic potential of Medway based on sector growth set out by Experian. It assumes that London Paramount is not delivered.
 - Sectors & London Paramount Indirect Scenario this uses the sector growth forecast from Experian and then includes in the indirect (supply chain) jobs that are forecast

to arise from London Paramount. Importantly these are jobs that will be within each local authority area.

- Sectors & London Paramount Total Scenario this scenario includes the job growth
 forecast above but also examines the share of London Paramount direct
 employment that will be taken up by people living in each LA area. This includes
 construction jobs, Resort jobs and hotel jobs that are generated out with the
 authority area but will likely require 'out-commuters' from Medway.
- 1.50 In line with the PPG, GVA will understand the level of household growth needed to support employment growth. To do this, GVA has employed the following assumptions which are used to understand the relationship between jobs, residents and dwellings.

Economic Assumptions

1.51 The relationship between job growth and population growth is contingent on a number of factors, for example, the level of unemployment and economic activity in the local population, and the extent to which the working population is employed locally (commuting patterns). Once job growth has been translated into population growth, through the use of household formation rates and vacancy rates it is possible to translate this population growth into dwelling growth.

Unemployment

- 1.52 The level of unemployment over time is important for understanding the link between population growth and job growth. For example, if a number of jobs were created in an area, and unemployment rates were historically high, it is likely that a significant proportion of those jobs would be taken by unemployed residents who are seeking employment. If on the other hand unemployment were at a historic low, more of the jobs would need to be filled by new economically active people moving / commuting into the area to work. If people move to an area for work, this creates a need for more housing.
- 1.53 GVA has utilised the Census (2001 and 2011) and Annual Population Survey (APS) (2001 to 2014) to understand how unemployment has changed over time and how it is likely to change in future.
- 1.54 Sensitivity tests on the economic model will need to address the impacts of London Paramount (for example) on local employment rates and, in turn, the need for changes to commuting or in migration.
- 1.55 Figure 5 sets out the APS unemployment rates and how the model projects unemployment will return to long term averages.

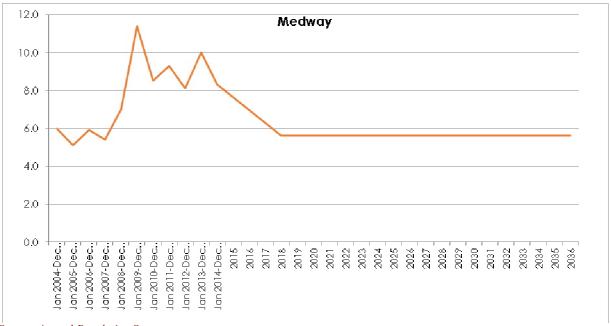


Figure 5 - Unemployment (% of those economically active) from the APS

Source: Annual Population Survey

Economic Activity

- 1.56 The same principle applies to economically active population (which is the total number of people in work or looking for work) as unemployment. As the economically active population increases (due to a rising number of older persons supplementing their pension for example or an increasing number of women working instead of raising families full time) the pool of local labour increases, reducing the need for in-migration to support increases in the number of jobs in a local area. Reduced in-migration means less migrants to house.
- 1.57 Economic activity by age and sex is taken from the 2011 Census. This is projected forward using the trends with the Kent County Council (KCC) 'Technical Paper Activity Rate Projections to 2036' October 2011²¹. These assume that economic activity rises in line with the 2006 Labour Force Survey up to 2020, with further increases in older cohorts from 2020 to 2030. This projection is termed 'Sensitivity 1'.

²¹https://shareweb.kent.gov.uk/Documents/facts-and-figures/Economy/technical-paper-activity-rate-projections-to-2036.pdf

1.58 An alternative scenario has looked at a trend based economic activity projection incorporating assumptions from Experian's Report 'Employment Activity and the Ageing Population'. This has the effect of increasing economic activity for women, in line with past trends from 1981 – and recognising that the trend has slowed somewhat, and increasing economic activity in older persons (males and females) significantly. Figure 6 sets out the adjustments made in this scenario. This projection is termed 'Sensitivity 2'. Both sensitivities will be looked at through this study.

100.00% 90.00% 80.00% 70.00% 60.00% 50.00% 40.00% 30.00% 20.00% 10.00% 0.00% 15-19 20-24 25-29 30-34 35-39 40-44 45-49 50-54 55-59 60-64 65-69 70-74 -2012 **-**2037 100.00% 90.00% 80.00% 70.00% 60.00% 50.00% 40.00% 30.00% 20.00% 10.00% 0.00% 15-19 20-24 25-29 30-34 35-39 40-44 45-49 50-54 55-59 60-64 65-69 70-74 -2012 2037

Figure 6 - Sensitivity to look at increased economic activity in females and older persons

Source: ONS / Experian (Males top chart, females bottom chart)

Commuting

1.59 A commuting rate is the ratio of employed persons to employment in a given area. If an area has a high commuting rate (i.e. a ratio of more than 1 employed person for every job) this means that the area is accommodating (housing) workers from the surrounding area. The converse if true is the ratio is less than 1. If an area has a high and stable commuting rate (because it lies adjacent to a large employment centre for example) then as the economy grows the area will have to accommodate not only

indigenous job growth but also the growing number of commuters from the adjacent centre. This increases the level of housing growth needed to accommodate a given level of indigenous job growth.

1.60 In 2011 the ratio of employed persons to employment in Medway was 1.28. This means that for every 100 people working in the authority there are around 128 employed persons living in the authority – i.e. a large out-commute. Given the proximity of the authority to London this is to be expected. There is no evidence to suggest that this commuting ratio will change going forward and it is therefore kept static for the purposes of this study.

Double Jobbing

1.61 This analysis will assume that a certain number of the jobs created over the period to 2037 will be taken up by someone who already has a job ('i.e. someone who is double jobbing). We have assumed that the percentage of the population who does this is 3.69% which is in line with latest national labour force survey.

Results of Economic Scenarios

- 1.62 Table 8 sets out the number of houses that would be required to support the growth forecasted by the employment scenarios above.
- 1.63 Table 8 indicates that the demographic scenarios set out above, which, on the basis of longer terms trends project growth of around 1,136²³ household per annum in Medway, would be, on the basis of Sensitivity 1, insufficient to achieve forecasted job growth in any of the assessed employment scenarios.
- In Medway the effect of the economic scenarios is modest; with baseline employment growth requiring dwelling growth of 1,154 households per annum (1.5% increase on baseline demographic needs (1,045 households per annum)). Notwithstanding, the London Paramount Indirect Scenario generates an uplift of 2.9% from baseline demographic needs (taken as around 1,036 households per annum). As per paragraph 1.42, we have converted household growth to dwellings growth by introducing a vacancy and second home rate.

Table 8 - Annual Dwelling Growth 2012-37 Economic Scenarios and increase from demographic needs (Sensitivity 1)

Area	Growth Per Annum (2012 – 2037)	Increase from baseline demographic needs (%)
------	--------------------------------	---

²³ The average of the UPC adjusted and unadjusted long term scenarios

		Households	Dwellings	(1,136 hpa / 1,179 dpa)
Medway	Sector Growth	1,154	1,197	1.5%
Medway	LP Indirect	1,169	1,213	2.9%

Source: Experian, Popgroup, GVA

- 1.65 The LP Indirect employment scenario would generate an additional 3,080 economically active people who would have to commute out of the authority area for work on the basis of the existing commuting rates in the authority. The third economic scenario which measures the employment draw of London Paramount on the economically active population of Medway concludes that 1,579 jobs would likely be filled by Medway residents. Over the period 2012 to 2037, there is therefore more than enough out-commuting to meet this economic scenario.
- 1.66 If economic activity rate Sensitivity 2 is inputted into the model it increases the level of economic activity in the general population and reduces the level of population and therefore household growth required to achieve the economic scenarios. The results of this scenario are set out in Table 9. Although the overall level of population and household growth is lower for Sensitivity 2, economically active rates are higher and therefore the LP Indirect scenario generates an additional 3,150 economically active persons. As per Sensitivity 2, there is more than enough out-commuting generated by this scenario to meet the increased labour force needs of the London Paramount resort.

Table 9 - Annual Dwelling Growth 2012-37 Economic Scenarios and increase from demographic needs (Sensitivity 2)

Area		Growth Per Annum (2012 – 2037)		Increase from baseline demographic needs (%)	
		Households	Dwellings	(1,136 hpa / 1,179 dpa)	
Medway	Sector Growth	983	1,020	-13.5%	
	LP Indirect	998	1,036	-12.1%	

Summary

1.67 The demographic scenarios project **dwelling** growth of between 1,167 dpa to 1,317 dpa in Medway. Given the fluctuations in population growth and levels of migration, it is considered that a longer terms perspective is justified. The extent to which UPC is accounted for is a matter of judgement. To account for it fully will reduce the annual dwelling need to the lower end of the range. For comparison purposes we have taken

the mid-point figure for a long term migration scenario adjusted and unadjusted for UPC. This equates to 1,179 dpa in Medway. If we consider the 2012 HP, which projects dwelling growth of 1,317 dpa in Medway (1,270 households per annum) it is clear that longer term trends show much lower growth than short term trends (used by the latest household projections).

- 1.68 If the wider North Kent area is assessed, including Gravesham, Medway, Swale, Maidstone and Tonbridge and Malling, annual dwellings needs range from 3,885 to 4,066 dpa.
- 1.69 GVA has reviewed forecast employment growth. It is concludes that baseline employment growth (i.e. without the effects of London Paramount) would require an increase in housing delivery of around 1.5% on the basis of current levels of out commuting and modest increases in economic activity. If London Paramount is delivered, the Sensitivity 1 concludes that housing delivery would need to increase by 2.9% above demographic needs. However, if economic activity is increased further (Sensitivity 2), the demographic range is sufficient to meet all projected employment needs.
- 1.70 Both sensitivities produce sufficient labour force to deliver the level of employment growth likely generated from London Paramount directly i.e. they meet the Sectors & London Paramount Total Scenario.

Table 10 - Summary of scenarios for Medway

Scenario		Annual Growth (2012 to 2037)			
		Households per annum	Dwellings per annum		
Household projection (HP)		1,270	1,317		
HP including 2013 and 2014 MYE		1,235	1,281		
Long term migration		1,148	1,191		
Long term migration UPC		1,124	1,167		
Sector growth	Sensitivity 1	1,154	1,197		
	Sensitivity 2	983	1,020		
LP Indirect	Sensitivity 1	1,169	1,213		
	Sensitivity 2	998	1,036		

Source: GVA / Popgroup

Market Signals

Policy Context

1.71 As set out above in this report, the PPG provides direction in respect of many aspects of the planning process, including plan preparation. In particular, it provides a methodology for undertaking an assessment of full, objectively assessed housing needs as required by the NPPF; paragraph 47. The PPG informs that Household Projections should provide the "starting point" for an estimate of housing need (ID ref: 2a-015-20140306), but sets out that there are several other issues that should be taken into account, including market signals. In particular it states that:

"The housing need number suggested by the household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the local average may well indicate particular market under supply relative to demand." (ID ref: 2a-019-20140306; emphasis added)

A review of appropriate market signals is therefore required to establish the relative housing demand in particular areas. The PPG goes on to state that where relative demand is high, Local Planning Authorities (LPAs) should apply:

"...an upward adjustment to planning housing numbers compared to ones based solely on household projections." (ID ref: 2a-020-20140306; emphasis added)

Scope of Assessment

- 1.72 To establish the relative demand within Medway it is necessary to compare the market signals for this area to trends:
 - Within other LPAs with which the Medway has a functional relationship, including
 Gravesham, Dartford, Maidstone, Swale, Tonbridge and Malling, Canterbury and
 Sevenoaks, referred to hereafter as the 'sub-region'. It is acknowledged that this
 sub-region extends beyond the HMA however, this was considered necessary to
 pick up wider influences;
 - Across the South East region; and
 - Across England.

Market Signals and Data Sources

1.73 The PPG suggests a range of potential market signals for assessment, the table below identifies the market signals which have been considered by this assessment and the key data sources used.

Table 11 - Data collected for the market signals analysis

Market Signal	Data Source		
House Prices	Median annual house prices based on Land Registry data (CLG Statistics, Table 586) Land Registry Price Paid Index		
Rents	Private rental market statistics (Valuation Office Agency)		
Affordability	Ratio of prices to earnings: median and lower quartiles (CLG statistics, Table 576)		
Housing Market Activity	Annual property sales based on Land registry data (CLG statistics, table 588) as a percentage of dwelling stock (Census 2011)		
Vacancy Rate	Vacant Dwellings data (CLG Statistics, table 615)		
Overcrowding	Occupancy rating data (Census 2001 and 2011) Shelter Data Bank		
Rate of Housing Delivery	Dwelling Stock Data (Census 2001 and 2011) LPA Annual Monitoring Reports		

1.74 The PPG also advocates land prices as an appropriate market signal for consideration. However, there is no appropriate up to date source which provides comparable data for specific LPAs regarding residential land valuation. It is therefore not included in this assessment.

Market Signals Data

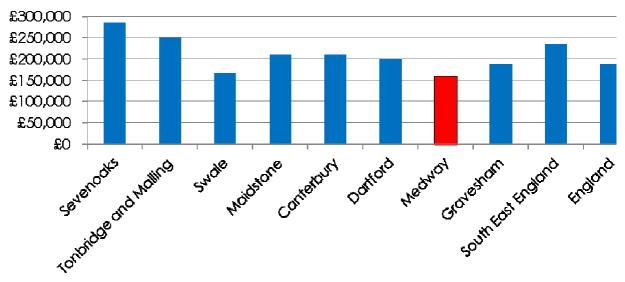
1.75 The remainder of this section discusses this data insofar as it is relevant to the conclusion regarding the scale of demand relative to supply in Medway.

House Prices

- 1.76 House prices and long-term trends in house prices can indicate an imbalance between the demand for and the supply of housing. Figure 7 details the most recent median price paid data available.
- 1.77 In 2013 the median house price across the sub-region was £220,325, with prices across the individual comparator authorities ranging from £160,000 in Medway to £285,000 in Sevenoaks. This indicates that there is considerable disparity in the scale of demand across the sub-region.

1.78 In 2013 the median house price in Medway was £160,000, the lowest of all comparator areas and 31% lower than the regional median of £231,750. This indicates that demand in Medway is relatively low when compared to neighbouring authorities and the South East region as a whole.

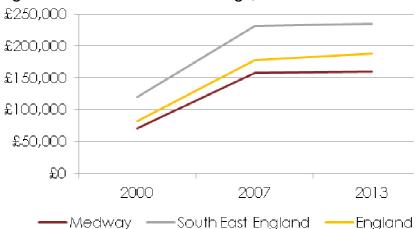
Figure 7 - Median House Prices, 2013



Source: CLG, median house prices based on Land Registry data, by district

1.79 Figure 8 profiles median house prices for Medway, the South East region and England from 2000 to 2013 (i.e. covering pre and post-recession periods).

Figure 8 - Median House Price Change, 2000 to 2013



Source: CLG, Median house prices based on Land Registry data, by district

1.80 House prices in Medway have increased significantly between 2000 and 2013 and broadly mirrored the national trend of significant price rises in the early 2000s, price falls/stagnation in the mid-2000s and moderate increases from 2010 onwards; with median house prices recovering to pre-recession levels.

- 1.81 Values in Medway between 2000 and 2013 have increased by 128.5%; the second fastest rate observed in the sub-region exceeding inflation in the region (96%) and sub-region average (125%) although in broad alignment with national rate (128.6%).
- 1.82 Overall, house price evidence indicates that whilst absolute median house prices in Medway are the lowest of the comparator areas prices have experienced significant inflation when compared to those of neighbouring authorities (sub-region) and the South East region as a whole.

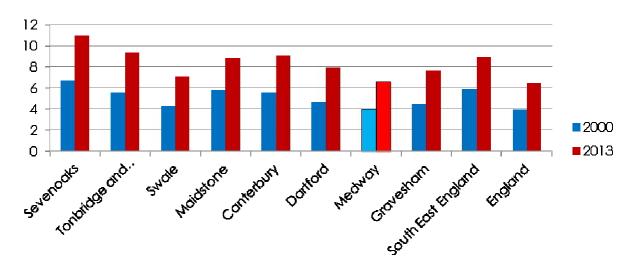
Rents

- 1.83 The cost of renting is also an indicator of demand for housing in an area. Medway saw median rents increase by 8.3% between 2010 and 2014, which whilst being the fourth fastest rate observed was a lower increase than the sub-region average. In absolute terms rents in Medway remain the lowest at £650pcm; £106 per month less than the sub-regional average.
- 1.84 Lower quartile rental prices provide an indication of affordability and demand at the lower end of the market. Between 2010 and 2014, lower quartile rents in Medway increased by 10% which is the second highest increase amongst the sub-region authorities; exceeding sub-region (7.3%), region (4.3%) and England (3.3%). Although in absolute terms at £550pcm lower quartile rents in Medway are the lowest of the sub-region, equating to £66 per month less than the sub-region average.
- 1.85 The average rental data does not provide a strong indication of demand when compared to neighbouring authorities; whilst rents have risen they have generally done so at a lower rate to that experienced across the sub-region and in absolute terms rents (median and lower quartile) are considerably lower than surrounding areas. However, notwithstanding the above it would appear that lower quartile rents are experiencing high demand.

Affordability

- 1.86 Affordability ratios provide an indication of the relative financial accessibility of an area's housing market to local workers. The affordability ratio for each comparator area is illustrated in Figure 9 which compares lower quartile house prices to lower quartile earnings and Figure 10 compares median earnings to median house prices between 2000 and 2013.
- 1.87 Over the 13 year period the affordability of housing across all comparison areas significantly worsened. In 2000 the lower quartile affordability ratio of Medway was 3.9; by 2013 this had increased by 65% to 6.5. This is a faster rate of change than experienced at sub-region (64%), region (51%) and nationally (64.9%).

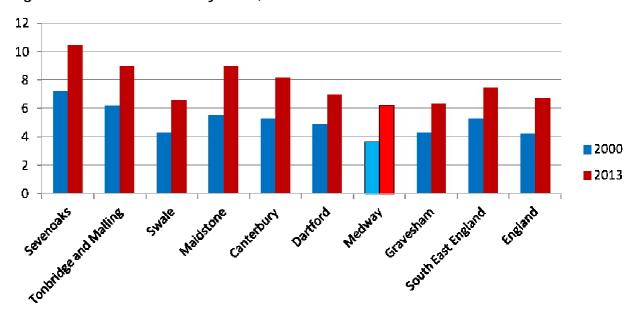
Figure 9 - Lower Quartile Affordability Ratios, 2000 and 2013



Source: CLG

1.88 Across this period the affordability ratios for median earnings to median house prices also significantly worsened, although to a slightly less severe degree. From 2000 to 2013, Medway experienced the greatest rate of increase of the sub-region (70%) to an affordability ratio of 6.22. However, notwithstanding this Medway remains the most financially accessible with affordability ratios well below the sub-region (7.82), region (7.45) and England (6.72).

Figure 10 - Median Affordability Ratios, 2000 and 2013



Source: CLG

Source: CLG

Vacancy Rate

- 1.89 Vacancy rates of an area can be perceived as an indicator of demand because they can identify a surplus or shortage of available stock to meet needs. A certain level of vacancy (typically 3%) is required to ensure adequate 'churn' of housing.
- 1.90 Figure 11 shows the percentage change in the number of vacant properties between 2004 and 2013. It shows that there has been some variation across the sub-region with some LPAs experiencing increasing vacancy rates (by up to 31% in Maidstone), whilst the majority have experienced a decrease.
- 1.91 Across the sub-region as a whole the vacancy rate changed from 3.33% in 2004 to 2.60% in 2013, equating to a decrease of 22%. Across the same period, vacancy rates in Medway also decreased, by 4% to 3.03%; the highest vacancy rate of all comparator areas, although not that dissimilar to the national average (2.73%).

8.00
7.00
6.00
5.00
4.00
3.00
2.00
1.00
0.00

**Tortridge and ** Syndle Maidstone Conferbunk Odniford Redwork Crawestration England England

**South East England England

**South East England

**South England

*

Figure 11 - Vacancy Rates, 2004 and 2013

Source: CLG

Concealed Households

- 1.92 Concealed households are generally those that would otherwise form a separate household but are prevented from doing so due to the unaffordability of a local market and/or the lack of available appropriate housing.
- 1.93 Indicators including overcrowding, sharing households, homelessness and households in temporary accommodation demonstrate unmet need in an area. The PPG suggests that long term increases in such households can signal the requirement for increased planned housing numbers in an area.

- 1.94 However, a degree of caution should be exercised when analysing such data as some people may choose to live in more overcrowded accommodation due to cultural practices (i.e. living in extended families) or accepting of such conditions due to location or other factors.
- 1.95 Table 12 sets out concealed households for Medway and the sub-region and how numbers have changed over time. It is clear that concealed households have increased significantly between 2001 and 2011. In Medway the total change was 68%, with 13% of families under 25 year old²⁴ concealed. When compared with the sub-region (77%) and regionally / nationally (71%) concealment is not deemed to be significant, albeit with the percentage of under 25 year old families concealed at 13%, higher than the sub-region, this shows that there may be some issues around affordability and availability of housing in Medway.

Table 12 - Concealed Families in 2001 and 2011 and by age

	Concealed FRP All (2001)	Concealed FRP All (2011)	Increase %	Concealed FRP Under 25	Concealed FRP 25 to 34
	7111 (2001)			(2011)	(2011)
Canterbury	351	583	66.10%	12.17%	3.51%
Dartford	211	503	138.39%	12.45%	3.27%
Gravesham	426	767	80.05%	14.63%	6.23%
Maidstone	347	666	91.93%	11.07%	3.43%
Medway	782	1,312	67.77%	13.03%	3.48%
Sevenoaks	270	420	55.56%	14.10%	3.41%
Swale	342	652	90.64%	12.88%	3.69%
Tonbridge and Malling	279	430	54.12%	13.39%	2.89%
Sub-region	3,008	5,333	77.29%	12.84%	3.68%
South East	23,063	39,465	71.11%	13.96%	3.75%
England	161,254	275,954	71.12%	12.76%	4.01%

1.96 Overall, the market signals information in respect of concealed households does not provide strong evidence of supply led pressures in Medway.

²⁴ Measured by the 'head' of the family, which is usually the oldest male in the family.

Overcrowding

- 1.97 Overcrowding levels can be examined using Census data concerning the number of households with an occupancy rating of -1 or -2, i.e. households living in accommodation with one or two+ fewer bedrooms than required.
- 1.98 Current overcrowding levels in the sub-region vary significantly across the LPAs in the sub-region, ranging from 4.59% in Sevenoaks to 9.14% in Dartford. Between 2001 and 2011 all LPAs experienced an increase in the percentage of households living in overcrowded conditions although the rate of change was slight, ranging from 1.04% to 3.56% increase. The level of overcrowding in Medway rose at a slower rate (1.55%) than that experienced at the sub-region (1.97%), region (1.99%) and nationally (1.61%).

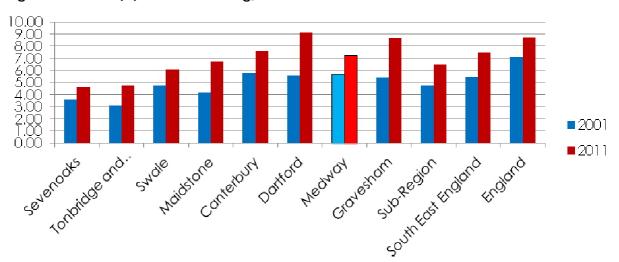


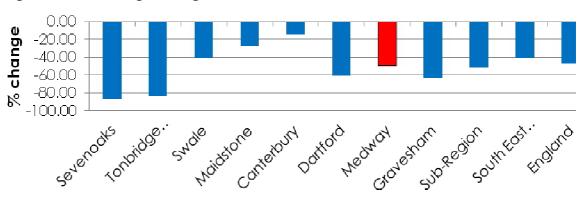
Figure 12 - Rates (%) of Overcrowding, 2001 and 2011

Source: Shelter/CLG

Homeless Households

- 1.99 Figure 13 illustrates the percentage change in the number of homeless households between 2005 and 2013.
- 1.100 Across all spatial levels there has been a decline in the number of homeless households. Across this period, in Medway homeless households declined by 49%, a faster rate of decline than for the region and for England, although marginally slower than the sub-region average.

Figure 13 - Percentage Change in Homeless Households, 2001 to 2011

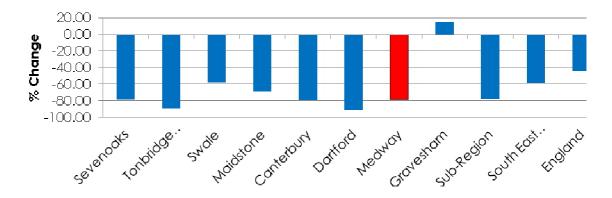


Source: Shelter/CLG

Temporary Accommodation

1.101 Figure 14 illustrates the percentage change in the number of households housed in temporary accommodation over the period 2005 to 2013.

Figure 14 - Percentage Change in Temporary Households, 2005 to 2013



Source: CLG

1.102 Medway saw numbers of households sheltered in temporary accommodation fall by 79%. This is a faster rate of decrease than the sub-region average (-78%), South East region (-41%) and England (-44%).

Shared Dwellings

1.103 All LPAs have a very small proportion of dwellings which are shared, ranging from 0.014% (7 shared dwellings) in Sevenoaks to 0.092% (59 dwellings) in Canterbury. The sub-regional average proportion of shared dwellings is 0.046% of total housing stock, which is smaller than the regional average (0.072%) and considerably smaller than the national average (0.09%). The low proportions demonstrated across the sub-region

indicate that shared households are not a strong indicator of demand levels in this location.

1.104 Medway has a higher proportion of shared dwellings although this is still only representative of 0.056% of housing stock (62 dwellings). This is the highest number of shared dwellings in the sub-region.

Housing Market Activity

- 1.105 The sub-region, South East and England have all experienced a decline in the number of transactions as a proportion of total dwelling stock between 2001 and 2012. This is likely due to the effects of the economic downturn and in particular the effect of mortgage availability in the latter years of that period.
- 1.106 Between 2001 and 2012, Medway experienced the greatest reduction in housing market activity (-55.80%) of all comparator areas.
- 1.107 The current (2012) rate of housing market activity in Medway is 2.99%. This is the third lowest transaction rate of comparator areas and is considerably lower than sub-region (3.15%) and South East region (3.30%) transaction rates, although higher than the national rate (2.75%).

8.00% 6.00% 4.00% 2.00% 0.00%

2001

2012

Figure 15 - Housing Market Activity Rate, 2001 and 2012

Source: CLG

1.108 Transaction rates can in some circumstances be considered a good indicator of housing market activity and thus demand levels. However, the transaction rate can be artificially suppressed by other influencing factors, such as the scale of new development and a lack of mortgage availability. As a result, data on transaction rates must be used with an element of caution, recognising that it may not be a wholly accurate reflection of absolute housing demand when used in isolation.

Rate of Development

1.109 The rate of development is a market signal related to the quantity of past housing under-supply. Figure 16 shows the percentage growth in total dwelling stock between 2001 and 2011.

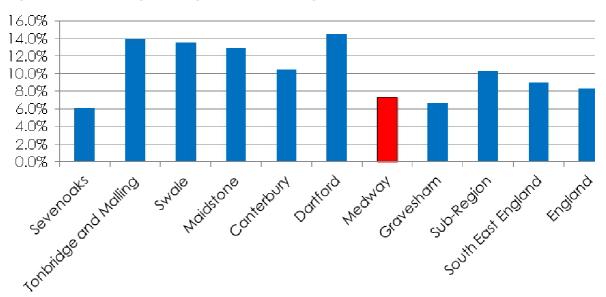


Figure 16 - Percentage Change in Total Dwelling Stock, 2001 to 2011

Source: Census 2001 and 2011

- 1.110 Between 2001 and 2011 all LPAs experienced growth in total housing stock, with an average sub-regional growth of 10.3%. The rate of growth in Medway was considerably lower at 7.3%; lower also than regional and national dwelling stock rates (8.9% and 8.3% respectively). This may indicate that there has been limited demand for the supply of new homes in Medway across the 10 year period.
- 1.111 Figure 17 illustrates the number of housing completions (net) in Medway against the plan target in force at the time, taken from the Council's Annual Monitoring Reports.

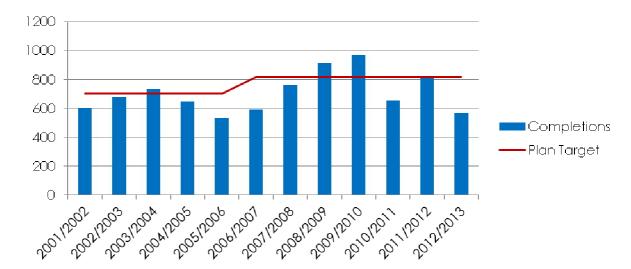


Figure 17 - Completion rates for Medway, 2001 to 2013

Source: Medway Council Annual Monitoring Reports

- 1.112 Over the period 2001 to 2013, a total of 8,459 dwellings were constructed in Medway. This equates to an average of 705 dwellings per annum and results in an overall shortfall of 745 homes against Local Plan targets. Figure 5.12 also shows year on year fluctuation with a peak of 972 dwellings built in 2009/2010 and a low of 530 dwellings completed in 2005/2006. Interestingly, completion rates have increased post-2007 with an annual average of 779 dwellings per annum built between 2007 and 2013 compared with 630 dwellings 2001-2006. Across the 12 year period, the number of completions has exceeded housing requirements only three times.
- 1.113 High rates of development can be a sign of demand in an unconstrained housing market; however, developments are also closely linked to the planning system and, in particular, planning policy and decisions. The housing completions data should therefore be used with an element of caution rather than a clear indicator or demand, or in the case of Medway potential lack thereof. Housing completions have repeatedly failed to meet the required rates of delivery, which may in turn have exacerbated the amount of demand of new homes.

Summary

- 1.114 Analysis of market signals data for Medway suggest a market that is not typical of the wider area or South East region. However, there are several indicators of market imbalance that may justify a limited uplift to planned housing targets above demographic indicators:
 - Whilst median house prices remain the lowest in the sub-region they experienced significant levels of inflation, considerably above sub-region and regional levels;

- Whilst rents (median and lower quartile) are the lowest in the sub-region they have increased at a faster pace than experienced regionally and nationally;
- Whilst Medway remains relatively more financially accessible when compared to neighbouring authorities, affordability has significantly worsened and at a faster rate than observed for the South East and England;

OAN Conclusions

- 1.115 This section of the report has explored the process laid out by the PPG with regard to OAN in Medway. It has:
 - Assessed household projections, the "starting point", and looked at locally specific issues such as long term migration trends and UPC.
 - It has reviewed future employment growth and assessed the extent to which demographic trends can meet anticipated job growth.
 - And finally it has reviewed housing market signals to understand if market pressures indicate that delivery should be increased to meet demand.
- 1.116 Overall, demographic needs point to around 1,179 dwellings per annum and economic driven needs point to a range of between 1,020 and 1,213 dwelling per annum. (13.5% fall or 2.9% increase). Given the market signals evidence there is no clear need for a significant increase in housing supply above the demographic projection, although increases in house prices and rents shows that affordability is worsening in the authority area relative to the surrounding area.
- 1.117 The PPG sets out no mechanism for adjusting OAN for market signals, but it does say that the increase should be appropriate for the scale of demand and the local context. The upper economic scenario provides a modest increase above the demographic-led scenario of 2.9% however, when compared to historic completions which averaged 705 between 2001 and 2013, this is a significant increase of 72%.
- 1.118 It is acknowledged that the upper economic scenario derives an annual need which is below that identified by the 2012 HP (1,317 dpa). The evidence presented here would seem to indicate that this level of growth is not necessarily appropriate given the level of employment that it is likely to be generated in the authority area. It is also acknowledged that an increase in economic activity above sensitivity 1 is likely however given this economic scenario reduces housing needs to below the demographic projection is it not considered an appropriate scenario given the evidence in round.
- 1.119 An OAN of 1,213 dwellings per annum meets the requirements of the PPG in respect of demographic trends and economic growth. It would however require an increase of

less than 3% above demographic trends which, given the market signals data, would seem modest. Notwithstanding, if household growth above that which can be sustained through increases in employment is planned for, it could risk further increases in out-commuting or increases in unemployment, neither of which are desirable outcomes. However, more recent demographic trends – which project short-term growth – do identify a need for around 1,280 dwellings per annum (2012 Household Projection scenario updated to reflect 2014 MYE). This scenario would lead to an increase of 8.6% above the base demographic figure of 1,179 dwellings per annum) which would provide a more significant uplift.

1.120 An OAN range between 1,213 and 1,281 dwellings per annum would therefore seem an appropriate balance given the evidence.

Medway Strategic Land Availability Assessment Main Report

November 2015

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Appendix ii – Identified Sites

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Appendix vii – Suitable Sites (Suitability Assessment Stage 2)

Appendix viii – Available Sites Appendix ix – Suitable and Available Sites

1 Executive Summary

Context

- 1.1 The National Planning Policy Framework (NPPF) requires Local Planning Authorities to prepare Strategic Land Availability Assessments (SLAA) to demonstrate the availability of potential development sites within their administrative boundary.
- 1.2 In assessing the supply of potential development sites the SLAA must considered if land is 'suitable' for development, 'available' and 'deliverable'. Land is considered suitable for development if it is free from development constraints; land is considered available if it is being actively promoted; land is considered deliverable if it is financially viable to develop.
- 1.3 The SLAA is required for two reasons. Firstly, it is a key piece of evidence that will inform the preparation of the new Local Plan. Secondly, it provides data to inform the calculation of the Council's Five-Year Housing Land Supply position, which is set out annually in the Authority Monitoring Report.
- 1.4 Whilst the SLAA indicates the Council's initial assessment as to whether a site is free of constraints likely to come forward for development, it does not allocate development sites or grant planning permission. As such the SLAA does not predetermine the Council's future assessment of sites through the local plan and development management processes.

Medway SLAA

- 1.5 Given that Medway is at a relatively early stage in the Plan making process the preparation of the SLAA is an important part of the evidence base of the emerging Plan.
- 1.6 As such, the Council has sought to undertake a robust and comprehensive assessment the suitability, availability and deliverability of potential development sites in Medway. The assessment process has comprised the following stages:
 - Identification of potential development sites in Medway through a desktop review and a 'Call for Sites';
 - An estimation of how much housing potential development sites might accommodate if developed;
 - An assessment of whether sites are subject to development constraints that might make them unsuitable for development;
 - An assessment of whether sites are available for development Full details of the methodology that has been employed at each of these assessment stages is set out in this report.
- 1.7 The assessment that has been undertaken has identified a total of 425 potential development sites in Medway. Of these 336 sites have been assessed as being unsuitable for development. A total of 89 sites have been identified as

being suitable for accommodating housing development, with an approximate capacity of 12,708 units, of which 11,381 do not currently benefit from an extant permission (although 5000 of these units are accommodated on the Lodge Hill site). These findings will be fed into the calculation of housing land supply in Medway for 2015/16.

Five-Year Land Supply

- 1.8 National policy requires that the Council identify 5 years supply of housing land at all times. Until such time as the Council has identified enough suitable land to meet its housing requirements, the guidance requires that the Council continue to review land within its boundary to identify sufficient supply of suitable housing land.
- 1.9 Whilst the Council has still to confirm the housing land supply calculation for 2014/15, to be published as part of the Authority Monitoring Report in December 2015, it is acknowledged that further suitable land will need to be identified to meet the Council housing requirements.
- 1.10 As such, in accordance with the SLAA guidance, it is anticipated that an update to the SLAA will be undertaken identify further suitable land for housing. The SLAA methodology has been designed to allow for this review to be undertaken quickly, objectively and robustly, informed by the public engagement that will be undertaken as part of the Issues and Options consultation that is being undertaken in January and February 2016.
- 1.11 It is anticipated that the robust process will focus upon reviewing how constraints identified through the suitability assessment can be overcome and resolved. Further detail for the programme for this review will be published in due course following further liaison with Members.
- 1.12 The Council welcomes any further input from landowners or developers to assist in the updating of the SLAA, particularly where detail can be provided about the deliverability of sites and the resolution of identified constraints.
- 1.13 It is anticipated that the updated SLAA will feed into the 2015/16 AMR calculation of housing land supply.

2 Introduction

Background

- 2.1 Every Local Planning Authority must produce a Strategic Land Availability Assessment (SLAA) to demonstrate the availability of potential development sites within their administrative boundary.
- 2.2 The need to undertake a SLAA is set out in the National Planning Framework (NPPF) para 159. This is supported by guidance called Planning Practice Guidance (PPG). The key requirements of the SLAA are to:
 - Identify sites and broad locations with potential for development;
 - Assess their development potential; and
 - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 2.3 There are some key points that should be acknowledged with reference to this document:
 - The SLAA does not allocate land for development. It simply identifies sites with development potential. It lists and maps land which is considered to be available and may be suitable (i.e. that is not constrained by specific factors);
 - The decision regarding where development should be located in the future will be made through Local Plans (including Sustainability Appraisal), and through the development management process when determining planning applications;
 - Inclusion of a site in the SLAA does not indicate that the development of the land is necessarily supported by the council or that it would be granted planning permission, or taken forward in policies;
 - The SLAA is based on the information available (supplied and researched) at the time. It is, in effect, a 'snapshot' of the capacity at that point (31st March 2015). Therefore the assessment and conclusions about sites may be subject to change over time, for example site boundaries, constraints may be overcome/mitigated or additional constraints identified, likely development timescales may change, and site capacity or densities may change.
 - The SLAA provides background evidence on the potential availability of land in Medway for development and the choices available for delivering development.

Methodology

- 2.4 The most up to date guidance for the preparation of SLAA is provided in the PPG ("the Guidance"), which was published in final form in March 2014. The Guidance largely follows the earlier Strategic Housing Land Availability Assessment: Practice Guidance (CLG, 2007) but provides further clarity on the use of windfalls and the approach to meeting any 'backlog' in housing delivery within the first five years.
- 2.5 The Guidance sets out a proposed methodology, breaking the process down into five stages with detail about what is expected in each stage, as set out Appendix 1. The specifics of the methodology are discussed in detail under Section 2.
- 2.6 This version of the SLAA deals only with Stage 1, Site Identification, and Stage 2, Site Assessment, of the PPG methodology. Stage 3 to 5, which deal with the calculation of five year housing land supply, will be addressed through the 2014/15 Authority Monitoring Report (AMR) which is published in December 2015.

Five Year Land Supply

2.7 This version of the SLAA does not set out the Council position in respect of Five-Year Land Supply. As noted above the Five Year Land Supply calculation will be published as part of the 2014/15 AMR in December 2015.

Local Plan Process

2.8 The SLAA will form part of the evidence base for Local Plan. Through the Local Plan process consideration will need to be given to whether available sites that are currently identified as unsuitable, can overcome identified constraints to be made suitable, having regard to a new spatial strategy for Medway.

Duty to Cooperate

- 2.9 The Guidance requires that Local Planning Authorities should work with neighbouring authorities within their housing market area in preparing and reviewing the SLAA. To this end the Council has liaised with its neighbouring authorities, outlining the methodology that has been employed and considering specific cross boundary issues such as:
 - The availability of services and facilities in their areas;
 - Environmental constraints in their areas (for example the Newington Air Quality Management Area in Swale Borough).

2.10	No methodological objections have been raised at this stage. The Council intends to continue to liaise with neighbouring authorities as further reviews of the SLAA are undertaken.

3 Site Identification

Scope of the Assessment

3.1 In defining the purpose of the SLAA, the Guidance states:

"An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period." (Reference ID: 3-001-20140306)

3.2 The SLAA must therefore assess all 'available land' for its suitability for both housing <u>and</u> economic development uses.

Assessment Area

3.3 The assessment area is the Medway Council administrative boundary.

Site Size

3.4 The guidance defined the site size for which SLAA assessments were to be undertaken:

'Plan makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate.

The assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m2 of floor space) and above. Where appropriate, plan makers may wish to consider alternative site size thresholds.'

3.5 As a result the 'Call for Sites' undertaken in Spring 2014 requested sites to be either 0.15ha and larger or have the potential to deliver 5 or more dwellings. This was to capture a full range of sites across Medway and to best reflect the urban nature of the district with smaller Brownfield regeneration sites.

Desktop Review

- 3.6 In order to identify as wide a range of sites as possible, a comprehensive desktop review of information sources was undertaken:
 - The extant Local Plan and Development Briefs were reviewed to identify sites or allocations without Planning Permission;
 - The Planning Department records were reviewed to identify Planning Applications that have been refused, withdrawn or lapsed;

• Liaison with other Council services was undertaken to identify vacant or under utilised land in Local Authority ownership (for example school sites, highways land or open space);

Call for Sites

- 3.7 In addition to the Desktop review the Council undertook a 'Call for Sites', this ran between Friday 14th March and Friday 9th May 2014. This was publicised through the following methods:
 - Public Notice in the Medway Messenger
 - Public Notice in Libraries
 - Council Website
 - Formal invitations to participate (Post and email)
 - Internal liaison with other Council Services
- 3.8 The distribution list for the mail shot included:
 - Statutory Consultees
 - Other Local Authorities
 - Parish Councils
 - Gypsy and Travelers Organisations
 - Stakeholder/Community Organisations
 - Local Agents/Landowners/Developers (Planning Department Contacts Database)
 - Interested residents (Planning Policy Consultation Database)
- 3.9 In responding to the Call for Sites promoters were required to complete a submission template which sought key details in respect of their sites including:
 - Site Location
 - Site Size
 - Ownership Details
 - Planning History
 - Development Status
 - Current Use & Proposed Use
 - Physical and Environmental Constraints
 - Utilities Constraints
 - Estimated Development Potential and Phasing

Village and Urban Boundary Review

3.10 Officers are undertaking a review of Village and Urban Boundaries in support of the Local Plan process. It is anticipated that this will identify further sites that will be assessed during the next iteration of the SLAA.

Planning Status

- 3.11 As one might expect the sites identified were at different stages of the planning process. To ensure a consistent approach to the SLAA assessment process, and consistency with the Authority Monitoring Report procedures, regard was had to the status of sites as at 31st March 2015.
- 3.12 Sites which were under construction at 31st March 2015 were excluded from the SLAA assessment process altogether. Sites that had an extant planning permission at 31st March 2015 were included in the SLAA. For these sites the assessment was undertaken on the basis of the approved applications i.e. regard was had to the approved scale of development; regard was also had to any judgements that the Council had made in granting permission.

Summary

3.13 In total 425 sites were identified through the Desktop Review and the Call for sites. These are listed at Appendix 2.

4 Site Assessment

4.1 The identified development sites where then subject to an assessment of their development potential, suitability, availability and achievability. The following outlines the parameters of each stage of assessment.

Submission Review

4.2 The first stage of the assessment process comprised a review of the completed templates that had been submitted by promoters of sites in response of the 2014 Call for Sites. Officers undertook an initial verification of the information, mapping sites and recording data on the Council database.

Site Surveys

4.3 The second stage of the sites assessment process comprised site surveys. The purpose of the survey was to gain further information on the sites, particularly with regard to the sites physical characteristics and how it related to the surrounding area. The surveys were undertaken jointly by Policy and Development Management officers. An example of the site survey form is attached at Appendix 3.

Development Potential

- 4.4 The Guidance (Reference ID: 3-017-20140306) advises that an estimation of the development potential of each identified site should be undertaken and guided by the existing or emerging plan policy including locally determined policies on density.
- 4.5 Where the plan policy is out of date or does not provide a sufficient basis to make a judgement the PPG advises that relevant existing development schemes can be used as the basis for assessment, adjusted for any individual site characteristics and physical constraints.
- 4.6 Medway Council does not currently possess a policy on density. Therefore it was necessary to estimate development potential. A two-stage methodology was used to estimate development potential, this is set out below.
- 4.7 The calculation of identified sites development potential has comprised a twostage process, first applying a typical site density, and then considering any supplementary site-specific information.

Stage 1 – Typical Densities

4.8 This has been informed by reviewing recent local planning permissions, to reach a realistic understanding of densities that are being achieved in Medway and Kent. The analysis assessed gross site size and the number of units permitted to calculate a gross density. Only permissions granted after 1st April

2012 have been considered on the basis that these will be broadly NPPF compliant. Details of the planning permissions reviewed are set out at Appendix 4.

4.9 However recognising that development densities are determined by the particular characteristics of a site, our analysis has been refined further by considering:

• Site location (urban or suburban/rural)

Recognising that the density achieved on a site will be dependent upon the character and appearance of the surrounding area, our analysis sought to identify typical densities for urban and suburban/rural areas.

Urban and suburban/rural areas have been defined with regard to proximity to public transport opportunities. Those areas within 400m of high frequency bus stop have been defined as urban, all other areas have been defined as suburban/rural.

Defining the ubran area with regard to access to high frequency bus stops, is effectively a simple 'Public Transport Accessibility Level' (PTAL) rating system. PTAL rating are used throughout the UK, notably in London, for planning purposes and as such this approach was considered applicable in this instance.

Site size (small, medium or large)

Alongside site location, site size also tends to have implications for the densities achievable. This is because larger sites tend to deliver infrastructure and/or open space which reduce gross densities. Having regard to a range of sites that had been identified, sites were categorised as follows:

- o Small > 1 ha
- o Medium < 1ha >5ha
- o Large <5ha

Having undertaken this analysis the typical densities that have been identified are summarised in the table below.

	Small	Medium	Large
Urban	42 dph	54 dph	24 dph
Suburban/Rural	11 dph	29 dph	

Stage 2 – Site Specific Information

4.10 The typical densities were then applied to the identified sites, having regard to the site's location and size. The typical densities calculation was then reviewed

against any supplementary information that might be available for the development potential of individual sites. This information included:

- Figures from extant and lapsed planning permissions;
- Land owner/agent development potential estimates (provided on the site forms);
- Established estimates from previous versions of the SLAA; and
- Estimates from Development Briefs.
- 4.11 Where typical density calculations and site-specific information conflicted, officer judgement was used to estimate an appropriate site development potential, having regard to their knowledge and understanding of the site in question.
- 4.12 It is anticipated that as the Local Plan progresses the Council will be able to identify preferred density standards, reflective of the Council's preferred spatial strategy for the area. The SLAA review will have regard to these preferred density standards and development potential figures will be reviewed as necessary.

<u>Development Potential – Economic Development</u>

- 4.13 The development potential of sites for economic development uses (i.e. employment uses) has been calculated by applying a simple 'plot ratio' to the gross site area.
- 4.14 Drawing upon their knowledge of the Medway employment land market, consultants GVA Bilfinger, who have been commissioned to prepare the Strategic Housing and Economic Needs Assessment (SHENA), advised that the following plot ratios (Site Area:Floorspace) are appropriate assumptions for the purposes of the SLAA:

Office: 1:1Industrial and Warehouse: 1:0.4

Suitability

- 4.15 Suitability can be best understood as whether a site is free from identified development constraints. Suitability does not mean that development will be acceptable on a site, or that a site is supported by the Council.
- 4.16 Having regard to this guidance, the SLAA undertook a two stage assessment suitability, comprising:
 - Stage 1 Screening
 - Stage 2 Detailed Assessment

Details of the methodology for these assessment stages are set out below.

Stage 1 – Screening

- 4.17 The first comprised a high level screening to identify the sites that are unsuitable as a consequence of 'restrictive' designations, as identified at paragraph 14 of the National Planning Policy Framework (NPPF) which sets out the 'Presumption in Favour of Sustainable Development'
- 4.18 Paragraph 14 notes that the Presumption should apply unless "specific policies in this Framework indicate development should be restricted". Footnote 9 explains that these restrictive policies include:
 - "...sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion."
- 4.19 Sites were excluded from further assessment if they were constrained by one or more of the following restrictive designations that are present in Medway:
 - North Downs Woodlands SAC
 - South Thames Estuary and Marshes SPA, Ramsar & SSSI
 - Medway Estuary and Marshes SPA, Ramsar & SSSI
 - Cobham Woods SSSI
 - Northward Hill SSSI
 - Dalham Farm SSSI
 - Chattenden Woods and Lodge Hill SSSI
 - Tower Hill to Cockham Wood SSSI
 - Halling to Trottiscliffe Escarpment SSSI
 - North Kent Downs AONB
 - Flood Zone 3b Undeveloped Land
- 4.20 Whilst noted in Footnote 9, for the reasons set out below, it was concluded that the following designations should not apply at stage 1:
 - Flood Risk (previously developed land)
 Whilst undeveloped land sitting within Flood Zone 3b was excluded at this stage, recent experience in Medway demonstrates that this level of flood risk can be mitigated on previously developed land. For example the Rochester Riverside site and St Mary's Island have both benefited from strategic flood risk defences making them suitable for residential development. As such it was considered appropriate that previously developed land within Flood Zone 3b should be taken forward to the detailed assessment stage, to allow proper consideration to be given to opportunities for flood risk mitigation.
 - Designated Heritage Assets

Sites that included designated heritage assets (such as Scheduled Ancient Monuments, Listed Buildings and Conservation Areas) were also taken forward to the detailed assessment stage to allow proper consideration of their impacts to be considered.

Green Belt

Given the scale of development needs that Council must accommodate over the Plan Period, it was considered appropriate and robust that Green Belt land should be subject to detailed assessment at stage 2. However, whilst Green Belt land has been assessed at stage 2, this does not comprise a Green Belt Review. The Council intends to undertake a Green Belt review separately as part of the Local Plan evidence base; this will specifically consider whether land performs Green Belt functions and meets Green Belt purposes, rather than simply whether a site is suitable for development.

Local Green Space

Local Green Space is a specific designation which is defined at paragraph 77 of the NPPF as a "green area [that] is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife". There are currently no Local Green Spaces designated within in Medway. Work on the new Medway Local Plan will assess the need for local green space and consider designations.

- 4.21 The stage 1 assessments were undertaken through a desktop GIS review. Where only parts of a site was subject to an intrinsic designation or land use, a view was taken as to whether the site could be divided so as not impact upon the designation, or whether the site should be excluded altogether.
- 4.22 It should be noted that whilst sites may have been excluded at Stage 1, that does not prevent land owners or developers seeking to progress the site through the planning application process.
- 4.23 The results of the Stage 1 Screening Assessment are presented at the table Appendix 5.
- 4.24 Sites that successfully passed through the screening stage were then subject to a detailed assessment stage to establish if they were suitable.

Stage 2 – Detailed Assessment

- 1.1 The Guidance identifies a number of factors that should be considered as part of an assessment of suitability:
 - "Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;

- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas."
- 4.25 Given that the Council is at an early stage in the Local Plan process it was decided that the detailed assessment stage should not seek to make any spatial strategy decision, as these would be more appropriately addressed through the Local Plan process.
- 4.26 Instead it was decided that, to best inform the preparation of the Local Plan the SLAA should comprise a high level, objective assessment of the physical and environmental characteristics of sites. Judgements in respect of the physical and environmental characteristics would be made in accordance with the NPPF.
- 4.27 To this end the Council designed a clearly defined and justified criteria based assessment. A simple traffic light (Red Amber Green Rating) methodology was designed to assess the following factors:
 - Facilities & Services Accessibility
 - Public Transport Accessibility
 - Strategic Highway Network Accessibility
 - Site Access
 - Ecological Potential
 - Designated Habitats
 - Landscape
 - Heritage
 - Flood Risk
 - Air Quality
 - Noise
 - Contamination
 - Site Developability
 - Amenity/Overlooking
 - Agricultural Land
 - Open Space
 - Employment Land
- 4.28 For each of these criteria the traffic light judgements have been made on the following broad basis:
 - Green = unconstrained
 - Yellow = anticipated that constraints can be resolved
 - Red = unresolvable constraints

- 4.29 As noted in the introduction it is envisaged that the criteria assessment will be reviewed and updated as the Local Plan progresses. As further information becomes available, and decisions are made in respect of the new spatial strategy, the judgements that have been made in respect of the various criteria will be updated.
- 4.30 The remainder of this section sets out why the criteria have been selected and how they have been assessed through the SLAA process.

<u>Facilities and Services Accessibility</u>

- 4.31 The NPPF requires facilities to be accessible to new developments, especially larger residential developments. Paragraph 38 of the NPPF thereby states: "Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties."
- 4.32 In light of this requirement it was considered appropriate that a simple, high level assessment of accessibility to services and facilities was undertaken as part of the detailed assessment stage.
- 4.33 We first identified a list of typical services that might be used be residents. We then categorised these within three distance categories:

400m (5 minutes walk):

- Food Shop
- Bus Stops
- Small Park (0-2ha)

800m (10 minutes walk):

- Children's nursery or crèche
- Primary School
- Bar, pub or nightclub
- Post Office
- Shopping hub (5+)
- Leisure facilities
- Community centre, village hall, or other community buildings
- Place of worship
- Pharmacy
- Local park (2-8ha)

2000m (cycling distance):

- Train station
- GP Surgery

- Dentist
- Secondary school
- College/higher education
- Library
- District park
- District Centre (Strood, Rochester, Chatham, Gillingham and Rainham as defined in the 2003 Local Plan central area insets maps)
- Supermarket
- District Sports facility
- Established employment area (as defined in the 2003 Local Plan)
- Bank or ATM
- 4.34 To calculate an accessibility rating for each site, sites were assessed for the absence or presence of the facilities within the specified distance thresholds. The assessment recognised the best-served sites, where facilities were located within a lower distance threshold (i.e. where a facility was more accessible).
- 4.35 The assessment was undertaken using GIS mapping with regard had to physical barriers that might prevent access to facilities. The selection of services and facilities against which to rate levels of accessibility was informed by review of best practice and research on what represents sustainable development. The list is not definitive but the range of services reflects hierarchies of centres with a typical offer to meet community needs. An accessibility ranking was calculated for each site.
- 4.36 The methodology recognised that large-scale developments generally incorporate the delivery of new services to meet the needs of residents moving to the area. The assessment of large sites (over 500 dwellings) included an allowance for mixed-use development, providing new services.

RAG Rating	Assessment	Detail
Red	Poor Access	0-24 points
Amber	Adequate Access	25 – 33 points
Green	Good Access	34 – 43 points

4.37 Whilst there is a degree of subjectivity about how the accessibility methodology has been designed, given that the scoring system has been consistently applied to all sites, the assessment has been made as objective as possible. In further updates to the SLAA, the council will consider any additional information that may be provided on mixed use developments to determine sustainability criteria.

Public Transport Accessibility

4.38 The NPPF explicitly seeks to promote the use of sustainable transport, stating at paragraph 29: "The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel." Paragraph 34 goes on to state: "Plans and decisions should ensure

developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised."

- 4.39 In light of this requirement it was considered appropriate that a simple, high level assessment of accessibility to public transport opportunities was undertaken as part of the detailed assessment stage.
- 4.40 To this end all the bus stops and train stations within Medway were mapped and then categorised them according to their frequency of services (considering average hourly service provision between 8am and 6pm):
 - High frequency stop = Five of more services an hour
 - Moderate frequency stop = three or four services an hour
 - Low frequency stop = Less than three services an hour
- 4.41 Using GIS a 400m catchment was drawn around the bus stops and an 800m catchment around the train stations. Sites were then assessed to establish if the fell within a high, moderate or low service frequency catchment.

RAG Rating	Assessment	Detail
Red	Low Frequency Catchment	Access to less than 3 services an hour
Amber	Moderate Frequency Catchment	Access to 3 or 4 services an hour
Green	High Frequency Catchment	Access to five or more services an hour

Highway Network Capacity

4.42 Paragraph 32 of the NPPF requires that Transport Assessments be prepared in support of developments that generate significant amounts of movement with a view to understanding the impacts of developments on the transport network. Paragraph 32 goes on to state that Plans and decisions should have regard to:

"improvements can be undertaken within the transport network that effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."

- 4.43 Given these requirements, and given the existing constraints on the highway network in Medway it is appropriate that the SLAA assessment process considers the potential impacts of development upon the capacity and operation of the highway network.
- 4.44 However in the absence of a Transport Assessment for each site, such an assessment can only be undertaken at a high level. This means seeking to broadly understand the locations and scales of development that are

- constrained by the highway network, and whether these constraints are potentially resolvable.
- 4.45 To this end a review of the 2010 strategic transport model assessment was undertaken, supplemented with technical input from Integrated Transport colleagues about current conditions on the network. Assessment of sites was thereby made on the following basis:

RAG Rating	Assessment	Details
Red	Traffic generated by development of the site is likely to cause severe unresolvable impacts.	
Amber	Traffic generated by development of the site is likely to cause severe impacts, but that this is likely to be resolvable.	Given that almost all of the main distributor routes through Medway are subject to congestion and capacity issues, severe impacts were anticipated for all sites over 50 units. Details of the potentially congestions issues affecting a site are noted on the site proforma. An assumption was made that impacts could be technically resolved one way or another. However this assumption requires further more detailed investigation to verify if it is sound.
Green	Traffic generated by development of the site is unlikely to cause severe impacts.	All sites with development potential of less than 50 units were considered to fall within this category.

4.46 It must be emphasised that this assessment has been undertaken at a high level without the benefit of any site specific assessments or information. The comments are made to inform the SLAA process only and do not represent the Council's position regarding the capacity of the highway network and will not inform the development management or Local Plan process. It is anticipated that the new strategic transport model will be prepared in support of the Local Plan process. It is anticipated the SLAA will be updated accordingly upon completion of this new modelling work.

Site Access

4.47 Distinct from the capacity of the highway network, a key consideration in respect of the suitability of the site is whether a site has, or could have, an appropriate vehicular access. Clearly without a suitable vehicular access the site is unlikely to be able to accommodate development.

RAG Rating	Assessment	
Red	The site does not have an existing designated vehicular access. It is considered unlikely that a suitable access could be created.	
Amber	It is likely a suitable vehicular access could be created.	
Green	Site has an existing suitable vehicular access.	

- 4.48 The assessment of sites vehicular access arrangements was undertaken, informed by the site survey and a review of the site plan and online mapping tools.
- 4.49 It should be noted that whilst an initial site assessment of vehicular access arrangements have been undertaken as part of this process, the suitability of any access arrangements would need to be further investigated through the Development Management Process in liaison with Integrated Transport.

Ecology

4.50 The NPPF requires net gains in biodiversity and seeks to halt the overall decline in biodiversity. The NPPF states that:

"the planning system should contribute to and enhance the natural and local environment by...minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures." (paragraph 109, NPPF)

- 4.51 Given these requirements it is appropriate that the SLAA assessment process considers the potential impacts of development upon sites ecology. However in the absence of a phase 1 habitat survey only a very high level, cursory assessment can be undertaken.
- 4.52 The high level assessment of ecological potential was informed by the site survey, review of online mapping and a review of the local wildlife designations. Based on knowledge built up through detailed ecological assessments supporting planning applications, the council is aware that many urban and rural based sites in Medway have significant biodiversity interest. Therefore a cautious approach has been taken to assessing the ecological potential of sites, and noting the need for specific surveys to determine suitability and achievability of development. In considering the site at Lodge Hill, the council recognised the developers proposed a compensation and mitigation package to address impact on the features of the SSSI. However, as

this is a key matter to be considered through a Public Inquiry in 2016, an Amber rating was viewed appropriate.

RAG Rating	Assessment	Detail
Red	The site is known to	Site is within, or
	accommodate	partially within, a
	protected species	locally designated
	and/or habitats.	wildlife site.
Amber	The presence or	
	absence of protected	
	species and/or habitats	
	cannot be established	
	at this stage.	
Green	The site is known not to	Demonstrated by an up
	accommodate any	to date phase 1 habitat
	protected species	survey.
	and/or habitats.	

Designated Habitats – National & International

- 4.53 Paragraph 113 of the NPPF states: "Distinction should be made between the hierarchy of international, national and locally designated sites, so that protection commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks".
- 4.54 As explained in paragraph 4.19, sites that fall directly within an internationally or nationally designated habitat have been screened out at stage 1 of the suitability assessment process.
- 4.55 However it is recognised that even if a site does not fall directly within an internationally or nationally designated habitat, development nevertheless has the potential to have adverse impacts upon these areas. Furthermore consideration also needs to be given to the impact of development upon ancient woodland and also Marine Conservation Zones.
- 4.56 As such an assessment of the potential impacts of a site upon nationally or internationally designated habitats has been undertaken. Again in the absence of an ecological survey, only a cursory high level assessment has been possible.
- 4.57 To undertake this high level assessment use has been made of GIS to identify sites that are located in close proximity to a designated site or within a theoretical Impact Risk Zones (IRZ).
- 4.58 The Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make an initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI according to the

- particular sensitivities of the features for which it is notified and specify the types of development that have the potential to have adverse impacts.
- 4.59 Whilst the IRZ do not relate to the SPA or Ramsar designations, the SPA and Ramsar designations within Medway correspond with SSSI boundaries and in some instances share related features of interest. It is thereby considered sufficient, at this level of assessment, to use the IRZ as a proxy for indicating potential impacts upon the SPA and Ramsar.
- 4.60 With regard to the mitigation of potential impacts upon the designated habitats, it should be noted that a 'Strategic Access Management and Monitoring Strategy' has put in place by Medway Council. The Strategy sets out strategic measures to mitigate the likely significant effects of the development, individually or in combination with other developments, upon the SPA.

RAG Rating	Assessment	Detail
Red	Development of the site is likely	Site has direct
	to have a detrimental impact	relationship with the
	upon internationally/nationally-	designated site and its
	designated habitats which is not	sensitive features.
	considered resolvable.	
Amber	Development of the site is likely	Site falls within an IRZ.
	to impact upon	
	internationally/nationally-	
	designated habitats, but this	
	impact is likely to be resolvable	
	through strategic mitigation.	
Green	Development of the site is not	Site fall outside of the
	likely to impact upon	IRZs.
	internationally/nationally-	
	designated habitats.	

Designated Habitats – Ancient Woodland

- 4.61 The NPPF also states at paragraph 118: "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland".
- 4.62 Given this requirement consideration has also been given to the impact of the development of a site upon Ancient Woodlands, as part of the designated habitats assessment criteria.

RAG Rating	Assessment	Detail
Red	Development of the site is likely	The majority of the site
	to have a detrimental impact	include Ancient
	upon an Ancient Woodland.	Woodland
Amber	Development of the site may	Part of the site includes

	have a detrimental impact upon	Ancient Woodland
	an Ancient Woodland.	
Green	Development of the site is not	No part of the site
	likely to impact upon an Ancient	includes Ancient
	Woodland.	Woodland

4.63 The assessment was undertaken using GIS mapping. The assessment forms part of the Designated habitats score, see proforma for details.

Landscape

- 4.64 The NPPF states at paragraph 109 that "The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes".
- 4.65 In light of this requirement an assessment of the landscape value of a potential development site has been undertaken. In the absence of comprehensive site specific Landscape and Visual Impact Assessment, a high level assessment has been undertaken on the following basis:

RAG Rating	Assessment	Detail
Red	Development is likely to have a detrimental impact upon locally valued landscapes.	The site is situated outside of the built up area, within an area of locally valued landscape, which is considered
Amber	Development is likely to have an impact upon the landscape, but this may be resolvable through appropriate landscaping.	The site is situated outside of the built up area, but the landscape is considered less sensitive and to have some potential to accommodate change with appropriate landscaping and mitigation.
Green	Development is unlikely to have a detrimental impact upon locally valued landscapes.	Site is situated within built up area.

4.66 The assessment was informed by site visits, the Medway Landscape Character Assessment, technical input from the Landscape Officer, and secondary reviews of appropriate mapping.

Heritage

4.67 Paragraph 132 of the NPPF states: "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight

should be given to the asset's conservation... Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification."

4.68 In light of this requirement an assessment has been made of whether the development of a site is likely to have detrimental impact upon designated heritage assets i.e. Scheduled Ancient Monuments, Listed Buildings and Conservation Areas. In the absence of site specific heritage assessments that assess the impact of development proposals upon the significance of designated heritage assets, a high level assessment has been undertaken on the following basis:

RAG Rating	Assessment	Detail
Red	Development is likely to have a	Development would be
	significant impact upon	likely to result in
	designated heritage assets.	complete or partial loss
		of a heritage asset.
Amber	Development may impact upon	Site is within or is in close
	these designated heritage assets,	proximity to designated
	but this may be resolvable	heritage assets.
	through appropriate design,	
Green	Development is unlikely to have	There are no designated
	an impact upon any designated	heritage assets within
	heritage assets.	proximity of the site.

4.69 The assessment has undertaken using GIS mapping which identifies designated heritage assets, supplemented by information obtained through the site surveys and technical advice from the Authority Conservation Officer.

Flooding

- 4.70 Paragraph 100 of the NPPF states: "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere."
- 4.71 The NPPF thereby requires sequential approach to be taken. The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. Strategic Flood Risk Assessments provide the basis for applying this test. If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate.

- 4.72 Under the Sequential Test dwellings are classed as a 'more vulnerable use' and are allowed in Flood Zones 1 and 2. Dwellings are only allowed in Flood Zone 3a if an Exceptions Test is passed. Dwellings are not permitted in Flood Zone 3b. Employment, retail, leisure and commercial development is considered a 'less vulnerable use' and is allowed in Flood Zones 1, 2 and 3a. Less vulnerable uses are not permitted in Flood Zone 3b.
- 4.73 As explained in paragraph 4.20 sites on undeveloped land that fall within in Flood Zone 3b have been excluded from the detailed assessment stage. However brownfield sites that are within Flood Zone 3b have been included within the detailed assessment on the basis that experience in Medway demonstrates that strategic technical flood risk mitigation is deliverable on regeneration sites.
- 4.74 In accordance with the Sequential Test an assessment has been made of which category of flood zone, a site, or the majority of a site, falls within. This has been undertaken using GIS, having regard to the Council's Strategic Flood Risk Assessment, which includes mapping on surface water flood risk zones.
- 4.75 For sites that are at a higher risk of flooding (3a and 3b), a high level assessment has been undertaken of whether appropriate mitigation might be technically feasible. Regard has been had to relevant information, such as proposals for flood defences.
- 4.76 In summary the assessment has thereby been made on the following basis:

RAG Rating	Assessment	Detail
Red	Level of flood risk is	Site is in Flood Zone 3a or 3b or is in a
	unacceptable	area of high surface water flooding
		risk. It is not anticipated that the level
		of risk can be mitigated.
Amber	Level of flood risk is	Site is in Flood Zone 3a or 3b but or is
	acceptable	in area of high surface water flooding
		risk but it is anticipated that the level
		of risk can be mitigated.
Green	Site is at low risk of	Site is in Flood Zone 1 or 2 and
	flooding.	is not an area of high surface water
		flooding risk.

4.77 It has been necessary to consider economic development and residential uses separately, given that acceptable levels of flood risk are different for these different uses.

Air Quality

4.78 Paragraph 124 of the NPPF states: "Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for

pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan." Within the context of this requirement it should be noted that there are three declared AQMAs with Medway: Central Medway, Pier Road and High Street, and Rainham town centre. In addition the Newington AQMA in Swale Borough also has a relationship with traffic generated within Medway.

4.79 Given these requirements the SLAA sites were assessed to establish if development would: be subject to unacceptable levels of air pollution; or would contribute to exacerbating existing air quality problems within AQMA (i.e. by generating traffic which would route through an AQMA). The assessment was made on the following basis:

RAG Rating	Assessment	Detail
Red	Site is likely to be constrained by air pollution.	 Site is within an AQMA; and All traffic generated by development is expected to route directly through an AQMA and mitigation is not considered to be deliverable.
Amber	Site may be constrained by air pollution but mitigation likely to be deliverable.	 Site is not within an AQMA; and Whilst some traffic generated by development is anticipated to route through an AQMA, it is also anticipated that air quality impacts can be mitigated.
Green	Site is unlikely to be constrained by air pollution.	 Site is not within an AQMA; and Traffic generated by the development is not expected to route through AQMA (or potential AQMA)

- 4.80 The assessment was informed by the following:
 - Review of the GIS mapping to determine proximity to AQMA;
 - Review of GIS mapping to determine potential traffic routing. In the
 absence of a strategic transport model this could only be a high level
 judgement of likely traffic routing. It should be noted that given the
 central location of the three AQMA on the network it was considered
 likely that most development sites would generate at least some traffic
 that would pass through them.

 Technical advice from Environmental Health colleagues regarding the likelihood of appropriate air quality mitigation being deliverable. As part of these discussions it was noted that the Council is seeking to put in place an Air Quality Management Plan which will strategically manage air quality mitigation across Medway, and on that basis it was considered that mitigation was likely to deliverable for most sites.

Noise

- 4.81 Paragraph 109 of the NPPF states: "The planning system should contribute to and enhance the natural and local environment by...preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of...noise".
- 4.82 The Guidance adds to this stating: "Noise needs to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment."
- 4.83 Given these requirements the SLAA sites were assessed to see if they would be subject to unacceptable noise levels from existing noise sources. However in the absence of site specific noise assessments only a high level appraisal could be undertaken, having regard to potential sources of noise pollution that may be a constraint upon development.
- 4.84 The assessment was thereby informed by the site surveys and a review of online mapping to identify sources of noise pollution, as well as technical advice from Environmental Health colleagues. Potential sources of noise pollution included the: M2 Motorway, industrial units that involved processing or manufacturing capability and railway lines. The assessment was made on the following basis:

RAG Rating	Assessment	Detail
Red	The site is subject to	Site is close proximity to
	unacceptable levels of noise	a major source of noise
	pollution which cannot	pollution.
	reasonably be mitigated	
Amber	The site is subject to	Site is in close proximity
	unacceptable levels of noise	to a source of noise
	pollution that could be	pollution but site has
	reasonably mitigated	sufficient capacity to
		accommodate mitigation.
Green	The site is subject to acceptable	There are no sources of
	levels of noise pollution	noise pollution proximate
		to the site.

4.85 It has been necessary to consider economic development and residential uses separately, given that acceptable levels of noise pollution are typically different for these different uses.

Contamination

- 4.86 Paragraph 109 of the NPPF states that "The planning system should contribute to and enhance the natural and local environment by...remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."
- 4.87 Whilst contamination issues are generally technically resolvable, and generally achieve an environmental enhancement, remediation can have implications for development costs and thereby viability. Contamination can thereby be a constraint upon suitability for development. Given Medway's legacy of former industrial sites, contamination is an important issue to have specific regard to in the SLAA assessment.
- 4.88 In the absence of full desktop contamination assessments for all sites (or indeed site specific testing) it is only possible to undertake a high level assessment of a sites risk of contamination. This high level assessment has been informed by technical advice from the Council Environmental Health Team, having regard to features and past uses that indicate contamination is a risk. The assessment has been undertaken on the following basis:

RAG Rating	Assessment	
Red	Contamination is known or suspected on the site but	
	remediation is expected to be undeliverable.	
Amber	Contamination is known or suspected on site but	
	remediation is considered to be deliverable.	
Green	Contamination is not suspected on the site.	

Site Developability

4.89 A key consideration in respect of the suitability of the site is whether a site is physically developable. This relates to issues such as gradient, which is a particular constraint in parts of Medway, or other development abnormals such as complex site clearance. As such a high level assessment of site developability was undertaken on the following basis.

RAG Rating	Assessment
Red	The site is subject to development abnormals that would
	make the site difficult to develop.
Amber	Whilst the site is subject to some development abnormals,
	these are considered resolvable.
Green	The site is free from known development 'abnormals'.

4.90 The assessment of site developability was informed by the site survey and a review of the site plan and online mapping tools.

<u>Amenity/Overlooking</u>

4.91 A key consideration in respect of the suitability of the site is whether the development of a site would be likely to have impacts upon the amenity of neighbouring or nearby properties. This principally relates to issues such as overlooking. As such a high level assessment of amenity and overlooking was undertaken on the following basis.

RAG	Assessment
Rating	
Red	It is anticipated that development of the site would impact upon
	amenity of nearby residential properties.
Amber	The site has the potential to impact upon amenity of nearby
	residential properties.
Green	It is anticipated that development of the site would not impact
	upon amenity of nearby residential properties.

- 4.92 The assessment of amenity/overlooking was informed by the site survey and a review of the site plan and online mapping tools. This is an initial assessment only and does not predetermine any future assessment that would be undertaken by the Council through the development management process.
- 4.93 It has been necessary to consider economic development and residential uses separately, given that acceptable levels of amenity are typically different for these different uses.

<u>Agricultural Land</u>

- 4.94 Paragraph 112 of the NPPF states: "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality."
- 4.95 In light of these requirements the SLAA sites have been assessed to establish if they comprise the best and most valuable agricultural land. The assessment has been made of the following basis:

RAG Rating	Assessment	Detail
Red	Development would result in the loss of the best and most	Grade 1 or 2 agricultural
	versatile agricultural land.	land*
Amber		on agricultural land, it is
	versatile agricultural land.	understood to be Grade 3 or less.

Green	, -	The site is within built up area or the site is on the edge of the built up area and is not in active
		agricultural use.

^{*}Whilst the best and most versatile agricultural land includes Grade 3a the available mapping did not make this distinction and so 3a is not assessed as part of this exercise

- 4.96 Given the absence of detailed site specific assessment of agricultural land quality it has been necessary to rely upon the 'Provisional Agricultural Land Classification Mapping' published by Natural England. Natural England have confirmed that the Provisional Maps are not sufficiently accurate for use in assessment of individual fields or development sites, and should not be used other than as general guidance.
- 4.97 To this end the SLAA assessment that has been undertaken in respect of agricultural land is for general guidance only. This assessment does not prejudice the any future assessment that the Council may undertake as part of the development management or Local Plan process; the Council would generally expect detailed agricultural land quality assessments to be provided in support of proposals relating to development on agricultural land.

Open Space

- 4.98 As noted at paragraph 3.6, in seeking to comprehensively identify sites for assessment, land in Local Authority ownership has been considered, including areas of open space.
- 4.99 Paragraph 74 of the NPPF states that "existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements".
- 4.100 In light of this requirement, to establish if an open space site is suitable for development, it is thereby necessary to consider if it is surplus to requirements. This assessment has been undertaken through:
 - A review of the 2012 PPG17 Open Space Study
 - Technical advice from Greenspaces
 - A review of site surveys

- 4.101 The 2012 PPG17 Open Space Study assesses the quantity, quality and accessibility of local open spaces available for public use, and recommends standards of provision going forward (having regard to expected population growth). The assessment highlights that, whilst there are quantitative deficiencies in the majority of types of open space in Medway in the majority of areas, there are some areas that have quantitative surpluses including:
 - Chatham Sub Area Natural and Semi-Natural Green Space
 - Strood Sub Area Natural and Semi-Natural Green Space
 - Strood Sub Area Amenity Green Space
- 4.102 However having discussed these quantitative surpluses with colleagues in Greenspaces we have been advised that, for accessibility and qualitative reasons, the Council does not consider any area of designated public open space as surplus to requirements at this time.
- 4.103 Whilst all areas of 'designated' *public* open space were assessed as part of the PPG17 Study, some areas of 'undesignated' open space were not included¹. These are mainly amenity green space such as verges. Whilst this land has not been assessed as part of the PPG17 study it does nevertheless have an amenity or recreational function. In undertaking the SLAA assessment it was necessary to have regard to whether this land thereby performs a recreational or amenity function, or whether it can be considered surplus open space.
- 4.104 In summary the assessment has been undertaken on the following basis:

RAG Rating	Assessment
Red	Site is designated Open Space or site is undesignated Open
	Space which performs a recreational/amenity function.
Amber	Site is undesignated Open Space although which does not
	performs a recreational/amenity function.
Green	Site is not designated or undesignated Open Space.

Employment Land

4.105 The NPPF states at paragraph 22 that "Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."

¹ The 2012 PPG17 does not assess all the areas of open space that are identified in the 2003 Local Plan. Only sites identified in the PPG17 Study have been considered 'designated' for the purposes of the SLAA. Land that is identified in the Local Plan, but not in the PPG17 Study, is considered 'undesignated' for the purposes of the SLAA assessment.

- 4.106 In light of this requirement the SLAA has considered whether sites are allocated for employment or currently accommodate employment uses. The assessment has been informed by the site surveys and a review of the extant local plan.
- 4.107 Regard has also been had to the emerging Strategic Housing and Economic Needs Assessment (SHENA), which was emerging at the later stages of the SLAA process. This indicated likely future demand for employment land, on a quantitative, qualitative and spatial basis. However it is anticipated that following the publication of the SHENA a more comprehensive review of allocated but unoccupied employment land will be undertaken and this will be fed into a update of the SLAA.

RAG Rating	Assessment	
Red	Site is in active employment and is designated employment	
	land.	
Amber	Site is employment land, but may have potential for	
	redevelopment for other uses.	
Green	Site is not in active employment use and is not designated	
	employment land.	

4.108 It is not necessary to consider this criteria in respect of economic development uses.

Overall Suitability

- 4.109 Having completed the RAG assessment for each of the criteria, it was then necessary to draw this information together to form an overall conclusion on the suitability of a site for development.
- 4.110 A site was considered suitable for development on the basis that no unresolvable constraints had been identified in respect of any of the individual criteria i.e. a site had received no Red RAG Ratings. One or more Red RAG Ratings means the site is considered unsuitable for the purposes of this assessment.
- 4.111 As noted at paragraph 3.2 the SLAA has to consider suitability for both housing and economic development uses. However as has been noted through this report some criteria are either not applicable to both uses, or are applied slightly differently. For the purposes of completeness the criteria that have been considered for the different uses are set out in the table below.

General Criteria

- Facilities & Services Accessibility
- Public Transport Accessibility
- Strategic Highway Network Accessibility
- Site Access
- Ecological Potential

- Designated Habitats
- Landscape
- Heritage
- Air Quality
- Contamination
- Site Developability
- Agricultural Land
- Open Space

Housing Criteria	Economic Development Criteria
Flood Risk	Flood Risk
Noise	 Noise
Amenity/Overlooking	 Amenity/Overlooking
Employment Land	

- 4.112 In summary suitability assessment has identified:
 - 336 unsuitable sites (Appendix 6)
 - 89 Suitable housing sites accommodating approximately 12,708 units, of which 11,381 do not have an extant permission, although 5000 of these are on the Lodge Hill site (Appendix 7)
- 4.113 Whilst initial conclusions have been drawn regarding the suitability of sites for economic development uses, these cannot be finalised until the SHENA exercise has been completed. It is expected that the SHENA will be published in January 2016 and the conclusions will thereby be feed into the review of the SLAA.

Availability

- 4.114 The Guidance considers a site to be 'available' for development when, on the best information available, there is confidence that there are no legal ownership problems, such as multiple ownerships, ransom strips, tenancies, or operational requirements of landowners. Generally this means that the landowner has expressed an intention to develop, or that it is in the control of a developer who has expressed an intention to develop.
- 4.115 The conclusions about site availability were informed by officer understanding of the site, for example through planning applications or pre-application discussions, the call for sites and through the developer interview process.

4.116 The developer interviews took place in December 2014. All those who had responded to the call for sites were invited to meet with Officers to discuss their sites, with a particular focus on understanding availability. Officers sought to understand any barriers to deliverability and how these could be overcome and if solutions had implications for viability.

Achievability

- 4.117 The PPG says that an achievable site is one where "there is a reasonable prospect that the particular type of development will be developed on that site at a particular point in time" and is essentially a judgement about the economic viability of a site and whether it will be completed in the time period.
- 4.118 The Council has commissioned consultants to prepare a Medway wide viability assessment. This is being undertaken as part of the Strategic Housing and Economic Needs assessment and is expected to be published early in the new year. The findings of the study will be feed into the review of the SLAA in due course.

Proforma

4.119 The completed assessment proforma, comprising all of the assessment stages, are available in the supporting document 'SLAA 2015 - Site Assessment Proforma.'

5 Summary and Conclusion

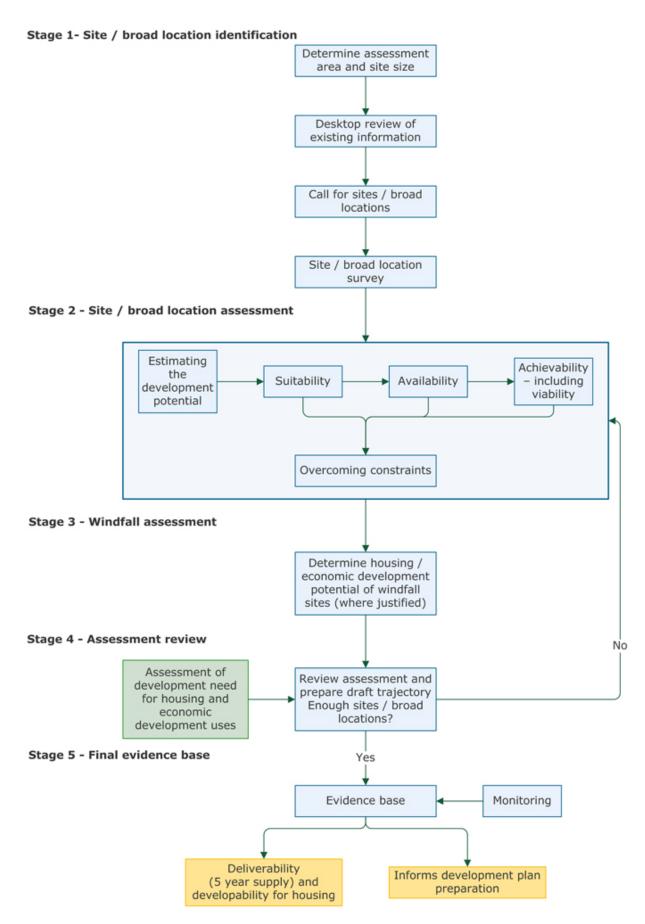
- 5.1 The purpose of the Strategic Land Availability Assessment (SLAA) is to identify the supply of development land in Medway that is 'suitable', 'available' and 'deliverable'. Land is considered suitable for development if it is free from development constraints; land is considered available if it is being actively promoted; land is considered deliverable if it is financially viable to develop.
- 5.2 The SLAA is thereby required for two reasons. Firstly, it is a key piece of evidence that will inform the preparation of the new Medway Local Plan. Secondly, it provides data to inform the calculation of the Council's Five-Year Housing Land Supply position, which is set out annually in the Authority Monitoring Report.
- 5.3 However the SLAA does not allocate development sites or grant planning permission. As such the SLAA does not predetermine the Council's future assessment of sites through the local plan and development management process. Rather it only indicates the Council's initial assessment as to whether a site is free of constraints and whether they are likely to come forward for development.
- 5.4 Given the importance of the SLAA this report has sought to clearly and robustly explain how the assessment process has been undertaken. This report has set out the methodology that has been used for the each parts of the assessment, explaining how development potential has been calculated, suitability assessed and availability determined.
- 5.5 This report has thereby identified a supply of 11,381 additional housing units in addition to those sites that already benefit from planning permission, although 5000 of these are on the Lodge Hill site.

Next Steps

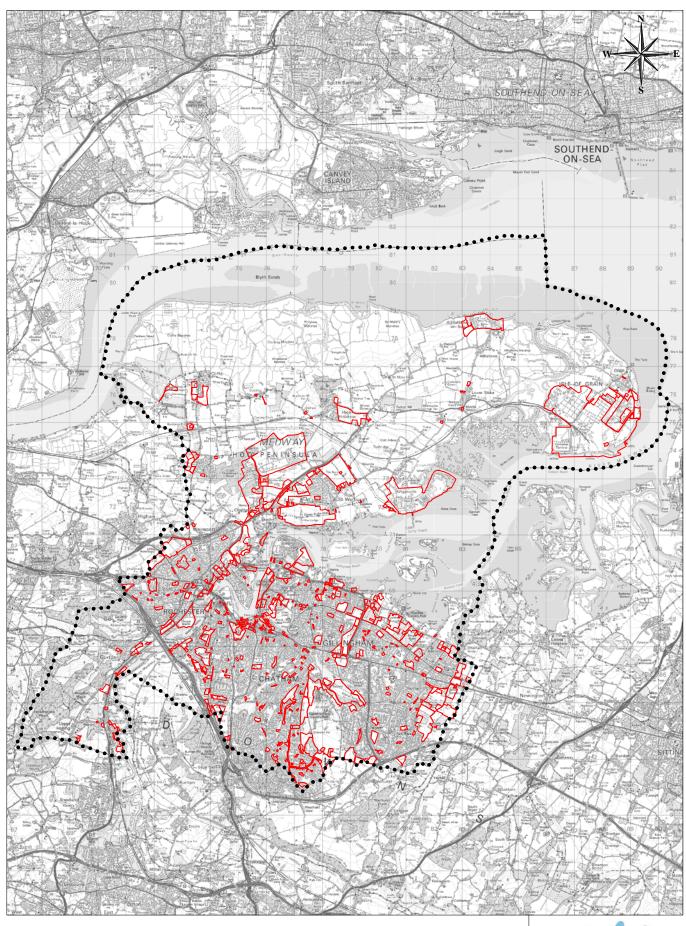
- 5.6 Stage 4 of the SLAA guidance specifically requires that the SLAA should be reviewed until sufficient suitable land is identified to meet the housing requirements for the housing market area.
- 5.7 Thereby until such time as the Council has identified enough suitable land to meet its housing requirements, both for the next five-year and the remainder of the plan period (i.e. to 2035), the latter stages of the SLAA process cannot be completed.
- 5.8 As noted above the Council is currently in the process of calculating its housing land supply for 2014/15. It is anticipated that this information will be published in December 2015 AMR.

- 5.9 Whilst this publication is still being finalised, the Council acknowledges that further suitable land will need to be identified to meet the Council housing requirements, particularly in regard to the Plan period. As such, in accordance with the SLAA guidance, a review will be undertaken identify further suitable land for housing.
- 5.10 The SLAA methodology has been designed to allow for this review to be undertaken quickly, objectively and robustly, informed by the public engagement that will be undertaken as part of the Issues and Options consultation that is being undertaken in January and February 2016.
- 5.11 It is anticipated that the robust process will focus upon reviewing how constraints identified through the 'Stage 2 Detailed Suitability Assessment' can be overcome and resolved. Further detail for the programme for this review will be published in due course following further liaison with Members.
- 5.12 The Council welcomes any further input from landowners or developers to assist in the updating of the SLAA, particularly where detail can be provided about the deliverability of sites and the resolution of identified constraints.
- 5.13 It is anticipated that the updated SLAA will feed into the 2015/16 AMR calculation of housing land supply.

Appendix i – SLAA Methodology Flow Chart



Appendix ii – Identified Sites



All SLAA sites assessed

Medway
Serving You

Scale:1:135000 06/11/15

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Appendix ii – Identified Sites

SiteName	SiteRef
Recreation Ground, Pottery Road	1
89 Ingram Road, Gillingham	3
Tangmere Close, Gillingham	8
Gillingham Cemetary Extension	9
Hillyfields	10
Layfield Road	11
Hillyfields Gillingham	12
Playground, Parr Avenue, Gillingham	14
St Mary Magdalene Church Grange Road	16
Rear of Dial Road, Gillingham	20
Forge Lane Gillingham	23
Davenport Avenue Gillingham	24
Cleveland Road Gillingham	25
Milner Road Gillingham	26
The Strand Gilingham	30
Castlemaine Avenue Gillingham	31
Strand Leisure Park	32
RSME Kitchener Barracks, Brompton	33
Retailing In Gillingham, High, Skinner, Jeffrey Strts	39
Recreation Ground, Vidgeon Avenue	45
Lodge Hill (Chattenden) Ministry of Defence Estate	50
Allotments, Cromer Road, Strood	52
Allotments, Clarendon Drive, Strood	68
Broom Hill, Strood	69
Recreation ground, Miller Way	73
Milfordhope Road, Strood	76
Albert Place, Strood	81
Carnation Road, Strood	82
Gravesend Road, Strood	88
Strood Riverside, Canal Road	90
Gun Wharf, Chatham	92
320 - 344 High Street inc. 42 New Road, Rochester	100
1-35 High Street, Chatham (Grays Garage)	102
Chatham Historic Dockyard	104
Inner Lines, Brompton	106
Playground, Brompton Hill	108
Watermill Gardens, Canal Road, Strood	109
Esplanade	110
Darnley Road, Strood	111

Carnation Road	112
Darnley Road, Strood	113
Adj to M2, Strood	114
Fulmar Road	115
Darnley Road, Strood	118
Carnation Road	119
Darnley Road, Strood	120
Bligh Way Strood	121
Thurston Drive, Strood	123
Strood Sports Centre	124
Knights Place Sports Ground	126
Recreation Ground, Darnley Road	129
Recreation Ground, Northcote Road	130
Cuxton Road	131
Recreation Ground Winston Road	132
Esplanade	133
Church Green recreation ground	134
Civic Centre and Janes Creek	137
St Bartholomews Hospital, New Road, Rochester	144
Singapore Drive Brompton	145
The Vines Rochester	146
Garrison Sports Stadium	149
Recreation Ground, Beechings Way	151
Sports Ground, Featherby Road	158
Playground Romany Road	159
Rookery Fields	162
East of Gillingham Golf Course	164
Allotments, rear of Allington Road Twydall	165
Allotments Eastcourt Green	166
Eastcourt Green North	167
Berengrove Park	169
Cozenton Park	170
Recreation ground, Wakeley Road	171
Adjacent to 7 Vancouver Drive	174
56A Pump Lane, Rainham	177
Dorset Square	179
274-276 Station Road Rainham	182
Petham Green Twydall	193
Beechings Green	194
Hawthorn Avenue	195
Orchard Precinct Retailing, Rainham	196
Eastcourt Green South	199
Vinall Park Gillingham	205

Beechings Way	208
352-356 Luton Road, Luton	213
Golf Course, Woodlands Road, Gillingham	214
Playground, Chalk Pit Hill, Chatham	216
Sports Ground, Watling Street	217
Borough Road, Gillingham	219
Sports Ground Watling Street	221
Rowland Avenue	224
Gillingham Park	228
Church Terrace Luton	232
Settington Avenue	233
Brambledown	234
Beacon Hill	236
Community Centre Stonecross Lea	237
Carlton Crescent Luton	238
Chatham-Comparison Retailing	243
Playground, Chalk Pit Hill, Chatham	245
Mount Road, Chatham	246
Dormers, 3 Upper Luton Road, Chatham	248
Sorting Office, The Paddock, Chatham	249
Allotments, Magpie Hall Road	251
Sports Ground, Bourneville Avenue	252
Jackson Recreation Ground, Rochester	255
Playing Field, Rosebery Road	258
Clarence Gardens, Borstal Road, Rochester	263
Sports Ground, Bush Road, Cuxton	264
Watts Meadow, Rochester	265
Manor Lane, Borstal	266
Friston Way, Rochester	267
Allotments, Fleet Road, Rochester	268
Fleet Road, Rochester	270
Allotments, Anchor Road, Rochester	271
Allotments, City Way, Rochester	274
Adj to 84 Priestfields, Rochester	276
Golding Close, Rochester	279
Sir Evelyn Road, Rochester	282
Sports Ground, Sir Cloudesley Close, Rochester	283
Sir Evelyn Road, Rochester	286
Sir Evelyn Road, Rochester	287
Maidstone Road, Rochester	288
Reservoir, Maidstone Road, Rochester	292
Disused Pit, rear of Mansel Drive, Borstal	293
Fort Borstal	295

Hill Road, Borstal	296
Priestfields Recreation Ground, Rochester	298
Adj 89 Kenilworth Drive	300
The Platters, Rainham	303
Chesham Drive	308
Silverspot Wood	309
Callums Scrubs	310
Rainham Park, Parkwood	318
Ryetop Playing Field Rainham	320
The Mailyns Rainham	321
Moor Park Close Rainham	322
Craigie Walk	323
Mierscourt Road	325
Adj 52 Mierscourt Road	327
Gatekeeper Chase	328
Peverel Green	330
Whitegate Wood, Hempstead	336
Playing Field, Harrow Road, Hempstead	337
Wigmore Park	339
Playing Field, Wigmore Road, Wigmore	345
Wigmore Reservoir & Pumping Station, Wigmore	346
Rear of Wigmore Reservoir, Wigmore Road, Wigmore	351
North Field, Halling	352
Walderslade Village	353
Weybridge Close, Lordswood	356
Rudge Close	361
Albermarle Road	362
Halling	363
Maidstone Road, Rochester	365
Tobruk Way, Chatham	368
Hook Meadow, Walderslade Road, Chatham	369
East Cookham Wood, Maidstone Road, Rochester	375
Adj to Fort Horsted, Chatham	376
Rochester Airfield	378
Albermarle Road	382
Heron Way, Princes Park	383
Princes Avenue, Princes Park	384
North Dane Wood	387
Princes Avenue, Princes Park	390
Adjacent to Lordswood Shopping Centre	392
Albermarle Road	393
Lordswood Lane	394
Albermarle Road	395

Mead Green	397
Lords Wood Lane	398
Lords Wood Lane	399
Albermarle Road	400
Opal Green	401
Somerset Close, Princes Park	403
Heron Way, Princes Park	404
Duchess of Kent Drive, Lordswood	405
McKenzie Road, Lordswood	406
Vixen Close, Lordswood	410
Ballens Rough	411
Dargets Wood	412
Dargets Wood	414
Land at 44-46 McKenzie Road, Lordswood	415
Lords Wood Lane	416
Lords Wood Lane	417
Sundridge Drive, Walderslade	418
Kingston Crescent	419
Walderslade Road, Chatham	420
Burma Way, Chatham	422
Recreation Ground, Princes Avenue, Walderslade	423
Walderslade Road, Chatham	425
Walderslade Road, Chatham	428
Roosevelt Avenue, Chatham	429
Sports Field, Warren Wood Road, Rochester	433
Allotments, Formby Road, Halling	434
South of Vicarage Road, Halling	435
Capstone Valley	438
Lower Upnor, RSME land	443
Garages off Tobruk Way/Burma Way, Chatham	448
124 Pier Road Gillingham	471
Car Park The Terrace Rochester	484
Safety Bay House Warwick Crescent Rochester	486
Southern Water Site Capstone Road Chatham	524
195 Princes Avenue Walderslade	559
47-48 Second Avenue Industrial Estate	571
A1-A5 and F1-F3, Elm Court Estate, Capstone Road	576
R/O 329 - 377 (Featherstones) High St ROCHESTER	598
Strood Service Station, 3 London Road, Strood	603
Walnut Tree Farm, 155 Lower Rainham Road, Rainham	604
Colonial House Quayside	632
Land adjacent to 45 Laker Road, Rochester	638
Grain Power Station, Grain Road	646

Kingsnorth Power Station	647
Land between Vanguard Way and Anthonys Way	648
Wilds Yard, Clipper Close, Frindsbury	652
Land adjoining Southern House, Anthonys Way	654
Watermill Wharf, Canal Road, Strood	657
82 Jeffery Street, Gillingham	663
39-41 Mills Terrace, Chatham	669
Cuxton Station, Station Road, Cuxton	676
Temple Waterfront, Roman Way, Strood	685
Diggerland, Roman Way, Strood	686
National Grid Property, Pier Road, Gillingham	687
Land at Medway Road, West of 32 Laurel Road	693
Adj 12 Street End Road, Chatham	697
National Grid Property Holdings, Grain Road	699
Ex Service Stn, adj 86 Corporation Street, Roch	700
31-39 Duncan Road, Gillingham	703
Pit 2, Roman Way, Strood	705
LIFT site, 551-555 Canterbury Street, Gillingham	707
Land rear of former St Matthews School, Borstal	708
Allhallows Holiday Park, Avery Way	709
North side of Commissioners Road	711
HMP Rochester, Sir Evelyn Road	712
Land to East of Chattenden Lane	713
Land to east of Chattenden Lane	714
Land to West of Church Farm, Church Lane, Hoo	715
Land to the East of Toad Hall, Main Road, Hoo	716
West of Tower Hill House, Castle Street Upnor	717
Bridge Lodge, Four Elms Hill	718
90-94 Bush Road, Cuxton	722
BAE Systems, Rochester	724
1-21 St Clements House, Corporation Street	726
10-40 Corporation Street, Rochester	728
North of Brompton Farm Road	729
46-86 Corporation Street, Rochester	731
Land at Listmas Road, Chatham	732
Amenity Land at 45-75 Chatham Grove, Chatham	733
Upnor Wharf	735
Former Upnor Quarry	737
Hoo Common, Chattenden	738
Communal areas, John Street, Rochester	740
Pattens Place, Rochester	741
Fenced area Lordswood Lane	743
Former Earl Community Centre, Albatross Avenue	746

Barn Meadow, Upper Halling	747
Wooleys Orchard, land south of Lower Rainham Road	749
Land Between Pump Lane & Bloors Lane, Rainham	750
BAE Sports & Social Club, Bells Lane, Hoo	751
North side of Commissioners Road, Strood	752
Land west of Hoo	753
Land at Burneys Farm, Lower Stoke	754
Former Police Station, Chatham	755
Pentagon, Chatham	756
Between Cross Street & The Brook, Chatham	757
Sir John Hawkins Car Park, Chatham	758
Whiffens Avenue Car Park, Chatham	759
Tesco, The Brook, Chatham	760
Parcel 4, Cliffe Wharf, Salt Lane, Cliffe	762
Parcel 8, Cliffe Wharf, Salt Lane, Cliffe	763
Land at Holy Trinity Church, Twydall Land, Twydall	764
St Lukes Church, Sidney Road, Gillingham	765
Land at Green Lane, Grain	768
Bridgewood, Rochester	773
Mill Hill, Grange Road, Gillingham	774
Bakers Field, Station Road, Rainham	775
Land at West Motney Way, Rainham	776
Trechmanns Wharf, Rochester Road, North Halling	777
Manor Farm, Lower Rainham Road, Rainham	778
Adj. To Farm Cottages, Lodge Hill Lane, Chattenden	780
218 Main Road, Hoo	781
Cuxton Gate, Station Road, Cuxton	782
Land at Capstone Valley, Darland Farm	783
Site A, west of Chapel Lane, Hempstead	784
Site B, east of Chapel Lane, Hempstead	785
Site C, land off Hoath Way, Hempstead	786
Adj Port Victoria Road, Grain	787
Land at Church Hill, Rochester Road, Cuxton	788
East of the Old Orchard, Merry Boys Road	789
Old Chalk Pit, Lower Rochester Road, Frindsbury	790
Former Equestrian Centre, Walnut Tree Farm Rainham	791
Port Medway Marina, Station Road, Cuxton	792
Middle Street Farm, Grain Road, Middle Stoke	794
Street Farmyard, Stoke Road, Hoo St Werbergh	795
Rede Court Gravesend Road	796
Holy Name Church, Lower Rainham Road	797
Land off Bush Road, Cuxton	799
Land west of Lower Station Road, Rainham	800

Land at Chapel Lane, Upper Halling	801
Chattenden Farm, Lodge Hill Lane	802
Former Officers Mess, Maidstone Road, Chatham	804
Beech Lodge, Chapel Road, Grain	807
Junction of Pier Road and Medway Road, Gillingham	810
Westmoor Farm, Moor Street, Rainham	814
East side of Vicarage Lane, Hoo	815
Meeting Hall, Queens Road, Gillingham	816
Berengrave Nusery, Rainham	817
J7, Chatham Maritime	818
Pump House 7, Leviathan Way, Chatham Maritime	819
Interface Land, Chatham Maritime	820
Machine Shop 8 Chatham Maritime	821
Land at Robins and Day	822
Chatham Docks, Chatham	824
Land east of Otterham Quay Lane, Rainham	825
Stonehouse Farm, Dillywood Lane, Frindsbury	827
Former Conoco Site/Thameside Terminal, Salt Lane	828
Medway Bridge Marina, Manor Lane, Rochester	829
Land at Grange Road, Gillingham	830
Land to the West of North Dane Wood, Lordswood	832
Medtha Bungalow, Port Victoria Road, Grain	833
1 Batchelor Street, off the Brook, Chatham	834
Walnut Tree Farm, r/o Longfield Ave, High Halstow	835
Land to the East of Church Street	836
Land to the West of Church Street	837
Former Alloy Wheels Priory Road	839
Land west of Maidstone & Rochester Roads, Rochester	840
Tesco Store, Rainham Shopping Centre	841
Tesco, Strood	843
Woolmans Wood Caravan Site	845
Garage Court at Sundridge Drive, Chatham	846
Siloam Farm, Rainham	847
Land south of View Road, Cliffe Woods	848
Bennetts Orchard, Lower Rainham	849
Luton LIFT site Alexandra Road	851
111 Rainham Road (Jezreels), Gillingham	853
The Brook (r/o High St and Batchelor St) Chatham	857
Land at High St, Union St and New Road, Chatham	860
141-151 New Road and land at Union Street, Chatham	861
296-310 High Street, Chatham	862
King Street, Chatham	864
2-8 King Street and 1-11 Queen Street, Chatham	865

55-105a The Brook & 1, 5, 11 & 13 King St, Chatham	866
2-14 Railway Street & 142-146 High Street, Chatham	867
19 New Road Avenue and 3 New Cut, Chatham	868
Wickes, New Cut, Chatham	869
Chatham Railway Station	871
West of Maidstone Road, adj Chatham Rail Station	872
Rear of 47 High Street/Britton Street, Gillingham	873
Land at junc. of Marlborough Rd/Brompton Rd, Gill	874
Retail Core(High St,Jeffrey St,King St) Gillingham	875
BT Switch Centre, Green Street, Gillingham	876
R/O 73,75-77 High Street, Rochester	880
15,17,19 New Road, Chatham	896
Former School Playing Field Halling	910
Bridgeside Warwick Crescent Rochester	914
Lock Up Garage Site Rear of Charles Street Chatham	959
Petrol Filling Station Railway Street GILLINGHAM	976
Adjacent to Staples Medway Street Chatham	983
Adjacent to Bus Station Medway Street Chatham	984
Bridgewood Manor Hotel, Walderslade Woods, Chatham	993
'Ropers Lane, Hoo St Werburgh	1009
Mount Pleasant, Cooling	1010
Daland Farm, High Halstow	1011
Off Power Station Road, Grain	1012
Sharnal Street, High Halstow	1013
Whetstead, Off Grange Road, Lower Twydall	1014
Off Sundridge Hill, Cuxton	1015
26-36 Napier Road Gillingham	1018
Moor Street House	1027
Mackays Lordswood Industrial Estate	1033
National Tyre Station Road Strood	1039
178 Brompton Farm Road, Strood	1042
R/O Whitehouse Farm, Stoke Road, Hoo	1043
East of Whitehouse Farm, Hoo	1044
Land at Tamarisk, Chattenden	1045
Former Reservoir, Browndens Lane, Upper Halling	1046
Land east of Seymour Road, Rainham	1047
Land at 54 Beacon Road, Chatham	1048
116-118 Twydall Lane, Twydall	1050
101 Beacon Road, Chatham	1052
Westmoor Farm (North) Moor Street, Rainham	1053
South section, Maidstone Road, Rochester	1055
6-11 New Road Avenue, Chatham	1056
North side, Priory Road	1057

R/O Oastview, east of Mierscourt Road, Rainham	1058
Meresborough Lane & South Bush Lane, Rainham	1059
Dudley Farm, Matts Hill Farm Road, Hartlip	1060
South of Lower Rainham Road, west of Pump Lane	1061
Shamley Road	1062
Mierscourt Farm, Rainham	1063
South of Lower Rainham Road, Mill Hill, Twydall	1064
South of Main Road, Hoo	1065
South Ratcliffe Highway, west Vidgeon Avenue, Hoo	1066
Gibraltar Farm, Ham Lane, Hempstead	1067
South of Sundridge Hill, Cuxton	1068
North Mortimers Avenue, west Town Road	1069
West of Town Road Cliffe Woods	1070
South Ladyclose Avenue, West of Town Road	1071
R/O 250 Main Road, Hoo	1072
Land at Mill Hill, Grange Road, Gillingham	1073
North Watling Street and Rede Court	1074
Land at Rectory Road, Cliffe	1075
West of Allhallows Road, Lower Stoke	1078
Land off Church Terrace, Stoke	1079
Delivery Office Rochester High Street	1080
Former Gym, Site C4, North Road, Chatham Maritime	1081
Land to the west of Cliffe Woods	1082
Wayside, Meresborough Lane, Gillingham	1083
Land west of Ropers Lane, Hoo	1084
Land east of Eastcourt Lane, Gillingham	1085
Westmoor Farm, Moor Street, Rainham	1086
Land to the East of Berwick Way, Wainscott	1087
Manor Farm, Parsonage Lane	1088
Land at Priestfield, Gillingham	1089
Abbots Court, Stoke Road, Hoo	1090
1 Port Victoria Road, Isle of Grain	1091
3 Broad Street Cottages, Main Road, Hoo	1092
Between 102-112 Lower Rainham Road	1093
Sports Field No 3, Brompton Road, Gillingham	1094
Collingwood Triangle, Brompton Barracks	1095
Sports Field No 1, Inner Lines, Brompton Barracks	1096
Greatfield Lodge, Darnley Road, Strood	1100
Cooling Road, High Halstow	1103
North of St James Church Cooling	1104
Manor Farm, Marsh Road, Halling	1105
Miles Place, Delce Road, Rochester	1106
131 City Way, Rochester	1107

Land at Lower Bloors Lane Rainham	1108
Steelfields, Danes Hill, Gillingham	1109
Land at the Alps	1110
North of Airport	1111
Land North of Christmas Lane, High Halstow	1112
Land to east of High Halstow	1113
Chatham Driving Range	1114

Appendix iii – Example Site Survey Form

SLAA SITE SURVEY FORM

Site Reference Site					
Character and Use of	Site				
Type of Location	Town centre Village	Edge of Cer Edge of Villa		Urban ☐ Rural ☐	Edge of Urban 🗌
Current use of Site	Residential Agriculture	Employment B	1 B2 B8 Other (please		Retail/Commercial
	Greenfield		PDL 🗌		Mixed 🗌
	Vacant Buildings Vacant Site?	s?		Yes No	
Current use of surrounding area	Residential Agriculture	Employment B	1 B2 B8 Other (please		Retail/Commercial
Brief site description Please also record cl	(site features, to naracter of surro	oography, buildings ounding area here	warranting rete (ie, form/massi	ention etc) ng, height/no	of storeys etc)
You can use the back		tional notes you ma	ay wish to make	> .	
Is the site advertised sale? Yes No		, please give detail	s.		
Boundary check Please check site against site plan. Is the site plan accurate?					
Yes No If No	, please draw cor	rect boundary on s	ite plan.		
Facilities and Connectivity					
Transport Connections (please tick)		geway	☐Footpaths ☐Cycleways ☐No existing a	access	

Site Poten	tiai					
	Yes	No	Maybe	Reason	Type (ie, type of dwelling, max height of building, employment/retail use class etc)	Environmental/amenity impacts experienced by would be occupiers and neighbouring areas
	Housing	J			,	
	Employ	ment				
	Retail					
	Mixed u	se				
	Gypsy a	nd Trav	eller			
Does the site have potential for?						
	Leisure					
	Tourist/	Visitor F	acilities			
	Residen Accomo elderly		for the			
	Other (p	lease s	pecify)			

Constraints (based on observation of site)						
	Yes		Mitigation Possible?		Mitigation	If yes, by when?
	163	Reason/explanation	Yes	No	in yes, by when:	
Physical Constraints					T	
Topography/Adverse Ground/Steep slopes						
Access						
Contamination						
Impact on residential amenity						
Hazards						
Condition of buildings/ground						
Environmental Constra	ints					
Ecology						
Impact on Landscape/Townscape						
Trees						
Utilities/Infrastructure					1	
Electricity						
Sewerage/Drainage						
Water						
Infrastructure/Utility requirements						
Other						
Please state any other considerations/constraints						
Surveyor Name(s)				[Date	

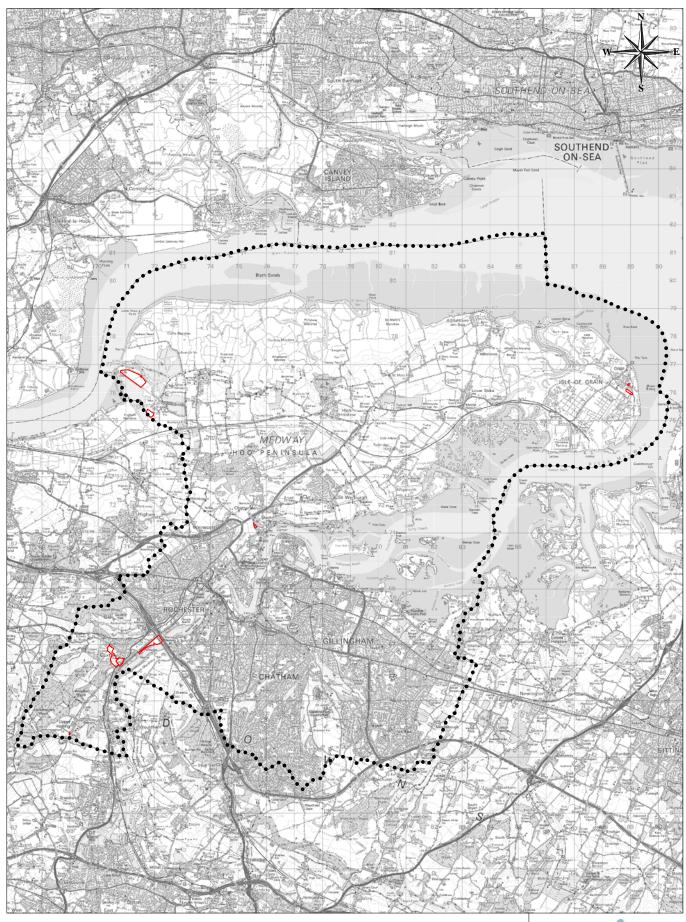
Please use this space for additional notes/drawings.				

Appendix iv – Typical Density Analysis: Planning Permissions Reviewed

Sites <1 hectare		
Medway	MC/12/1858	2-14 Davy Court & 186-196 Rochester High Street
Medway	MC/14/1140	1-41A Eldon Street, Chatham, ME4 4NB
Medway	MC/14/1640	159 Wigmore Rd, Gillingham, ME8 0TJ
Medway	MC/14/2084	124 Pier Road, Gillingham, ME7 1UD
Medway	MC/11/2848	Building E Victory Pier, ME7 1RL
Medway	MC/13/2484	142-144 Napier Rd, ME7 4HG
Medway	MC/13/0604 (full)	Courtsole Farm, Pond Hill, ME3 7QS
Medway	MC/11/2757 (outline)	Brompton Farm, Brompton Farm Rd, ME2 3QZ
Medway	MC/10/3543 (revised scheme)	Dean Farm, Bush Road, Cuxton, ME2 1HE
Medway	MC/12/2324 (full)	Coach House, Court Lodge Farm, The Street, Upper Stoke, ME3 9RT
Sites >1 hectare <5	hectares	
Medway	MC/12/0461	Tesco Store, Cuxton Road, Strood, ME2 2DE
Dartford	13/00871/FUL	East Side Of Lowfield Street
Medway	MC/12/0758	Victory Pier, Pier Road, Gillingham, ME7 1RL
Medway	MC/12/1400	Land South of Amherst Hill, Brompton, Gillingham
Maidstone	MA/12/1749	Land Off Marigold Way Maidstone Kent
TWBC	11/03812/FULMJ	Site Of 1-36 Ropers Gate And 26-60 Summervale Road Royal Tunbridge Wells Kent
TMBC	TM/13/01397	Area 57 Discovery Drive Kings Hill West Malling Kent
Medway	MC/13/0751	45 Cedar Grove, Hempstead, ME7 3QT
Maidstone	MA/13/1523	Land West Of Bicknor Farm Cottages Sutton Road Maidstone Kent
Maidstone	MA/13/1291	Land To The North Of, Howland Road, Marden, Kent

Sites >5 hectares					
Ashford	12/00400/AS	Chilmington Green			
Maidstone	13/1149	Langley Park			
Tunbridge Wells	13/02885/OUT	Land West Of Knights Way Royal Tunbridge Wells Kent			
Canterbury	CA/14/00648	Herne Bay Golf Club			
Thanet	11/0910	Land At, New Haine Road, Ramsgate			
Tonbridge and Malling	13/01535/OAEA	Kings Hill Phase 3			
Dover	DOV/10/01065	Sholden			
Dartford	DA/11/00295/OUT	Swanscombe			
Medway	MC/11/2516	Lodge Hill			

Appendix v – Screened Out Sites (Stage 1 Assessment)



Sites removed Assessment 1 stage

Medway
Serving You

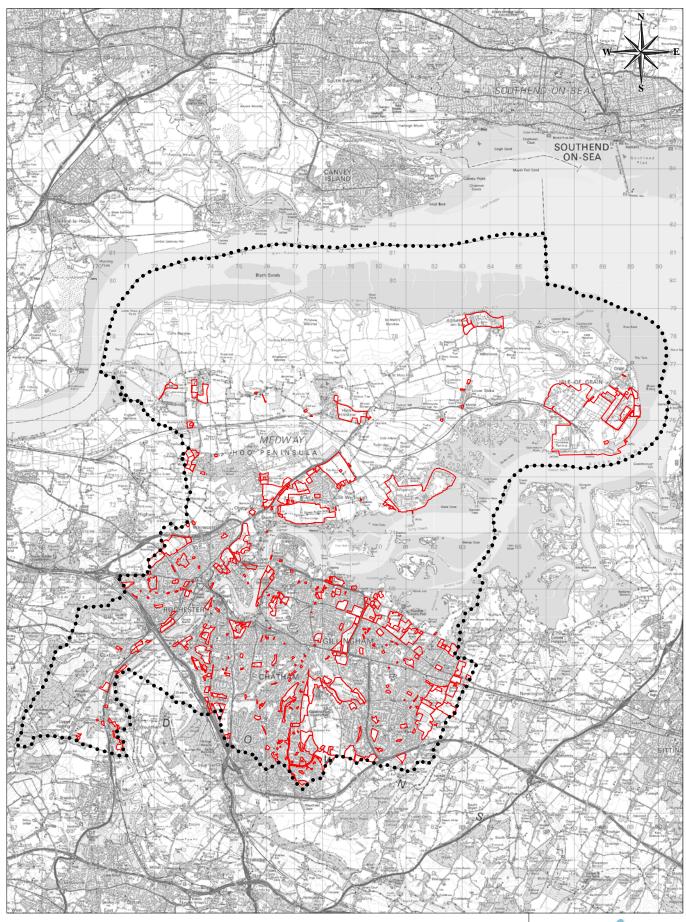
Scale:1:135000 06/11/15

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Appendix v – Screened Out Sites (Suitability Assessment Stage 1)

Site	Reference	Reason
		National & International
Former Upnor Quarry	737	Nature Designations
		National & International
Adj Port Victoria Road, Grain	787	Nature Designations
Land at Church Hill, Rochester Road, Cuxton	788	AONB
Land off Bush Road, Cuxton	799	AONB
Land at Chapel Lane, Upper Halling	801	AONB
Parcel 4, Cliffe Wharf, Salt Lane, Cliffe	762	Flood Risk
Parcel 8, Cliffe Wharf, Salt Lane, Cliffe	763	Flood Risk
Port Medway Marina, Station Road, Cuxton	792	Flood Risk
Beech Lodge, Chapel Road, Grain	807	Flood Risk

Appendix vi – Unsuitable Sites



Unsuitable SLAA sites

Medway
Serving You

Scale:1:135000 09/11/15

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Appendix vi – Unsuitable Sites

Site Name	Site Ref
Recreation Ground, Pottery Road	1
Tangmere Close, Gillingham	8
Gillingham Cemetary Extension	9
Hillyfields	10
Hillyfields Gillingham	12
Playground, Parr Avenue, Gillingham	14
St Mary Magdalene Church Grange Road	16
Rear of Dial Road, Gillingham	20
Forge Lane Gillingham	23
Davenport Avenue Gillingham	24
Cleveland Road Gillingham	25
Milner Road Gillingham	26
The Strand Gilingham	30
Castlemaine Avenue Gillingham	31
Strand Leisure Park	32
Recreation Ground, Vidgeon Avenue	45
Allotments, Cromer Road, Strood	52
Allotments, Clarendon Drive, Strood	68
Broom Hill, Strood	69
Recreation ground, Miller Way	73
Milfordhope Road, Strood	76
Carnation Road, Strood	82
Gravesend Road, Strood	88
Gun Wharf, Chatham	92
Chatham Historic Dockyard	104
Inner Lines, Brompton	106
Playground, Brompton Hill	108
Watermill Gardens, Canal Road, Strood	109
Esplanade	110
Darnley Road, Strood	111
Carnation Road	112
Darnley Road, Strood	113
Adj to M2, Strood	114
Fulmar Road	115
Darnley Road, Strood	118
Carnation Road	119
Darnley Road, Strood	120
Thurston Drive, Strood	123
Strood Sports Centre	124

Knights Place Sports Ground	126
Recreation Ground, Darnley Road	129
Recreation Ground, Northcote Road	130
Cuxton Road	131
Recreation Ground Winston Road	132
Esplanade	133
Church Green recreation ground	134
Singapore Drive Brompton	145
The Vines Rochester	146
Garrison Sports Stadium	149
Recreation Ground, Beechings Way	151
Playground Romany Road	159
Rookery Fields	162
Allotments, rear of Allington Road Twydall	165
Allotments Eastcourt Green	166
Eastcourt Green North	167
Berengrove Park	169
Cozenton Park	170
Recreation ground, Wakeley Road	171
Adjacent to 7 Vancouver Drive	174
Dorset Square	179
Petham Green Twydall	193
Beechings Green	194
Hawthorn Avenue	195
Eastcourt Green South	199
Vinall Park Gillingham	205
Beechings Way	208
Golf Course, Woodlands Road, Gillingham	214
Playground, Chalk Pit Hill, Chatham	216
Sports Ground, Watling Street	217
Sports Ground Watling Street	221
Rowland Avenue	224
Gillingham Park	228
Church Terrace Luton	232
Settington Avenue	233
Brambledown	234
Community Centre Stonecross Lea	237
Carlton Crescent Luton	238
Playground, Chalk Pit Hill, Chatham	245
Mount Road, Chatham	246
Allotments, Magpie Hall Road	251
Sports Ground, Bourneville Avenue	252
Jackson Recreation Ground, Rochester	255

Playing Field, Rosebery Road	258
Clarence Gardens, Borstal Road, Rochester	263
Sports Ground, Bush Road, Cuxton	264
Watts Meadow, Rochester	265
Manor Lane, Borstal	266
Friston Way, Rochester	267
Allotments, Fleet Road, Rochester	268
Fleet Road, Rochester	270
Allotments, Anchor Road, Rochester	271
Allotments, City Way, Rochester	274
Adj to 84 Priestfields, Rochester	276
Golding Close, Rochester	279
Sir Evelyn Road, Rochester	282
Sports Ground, Sir Cloudesley Close, Rochester	283
Sir Evelyn Road, Rochester	286
Sir Evelyn Road, Rochester	287
Maidstone Road, Rochester	288
Reservoir, Maidstone Road, Rochester	292
Disused Pit, rear of Mansel Drive, Borstal	293
Fort Borstal	295
Hill Road, Borstal	296
Priestfields Recreation Ground, Rochester	298
Adj 89 Kenilworth Drive	300
The Platters, Rainham	303
Chesham Drive	308
Silverspot Wood	309
Callums Scrubs	310
Rainham Park, Parkwood	318
Ryetop Playing Field Rainham	320
The Mailyns Rainham	321
Moor Park Close Rainham	322
Craigie Walk	323
Mierscourt Road	325
Adj 52 Mierscourt Road	327
Gatekeeper Chase	328
Peverel Green	330
Whitegate Wood, Hempstead	336
Playing Field, Harrow Road, Hempstead	337
Wigmore Park	339
Playing Field, Wigmore Road, Wigmore	345
Wigmore Reservoir & Pumping Station, Wigmore	346
Rear of Wigmore Reservoir, Wigmore Road, Wigmore	351
North Field, Halling	352

Walderslade Village	353
Weybridge Close, Lordswood	356
Rudge Close	361
Albermarle Road	362
Halling	363
Maidstone Road, Rochester	365
Tobruk Way, Chatham	368
Hook Meadow, Walderslade Road, Chatham	369
East Cookham Wood, Maidstone Road, Rochester	375
Adj to Fort Horsted, Chatham	376
Rochester Airfield	378
Albermarle Road	382
Heron Way, Princes Park	383
Princes Avenue, Princes Park	384
North Dane Wood	387
Princes Avenue, Princes Park	390
Adjacent to Lordswood Shopping Centre	392
Albermarle Road	393
Lordswood Lane	394
Albermarle Road	395
Mead Green	397
Lords Wood Lane	398
Lords Wood Lane	399
Albermarle Road	400
Opal Green	401
Somerset Close, Princes Park	403
Heron Way, Princes Park	404
Duchess of Kent Drive, Lordswood	405
McKenzie Road, Lordswood	406
Vixen Close, Lordswood	410
Ballens Rough	411
Dargets Wood	412
Dargets Wood	414
Land at 44-46 McKenzie Road, Lordswood	415
Lords Wood Lane	416
Lords Wood Lane	417
Sundridge Drive, Walderslade	418
Kingston Crescent	419
Walderslade Road, Chatham	420
Burma Way, Chatham	422
Recreation Ground, Princes Avenue, Walderslade	423
Walderslade Road, Chatham	425
Walderslade Road, Chatham	428

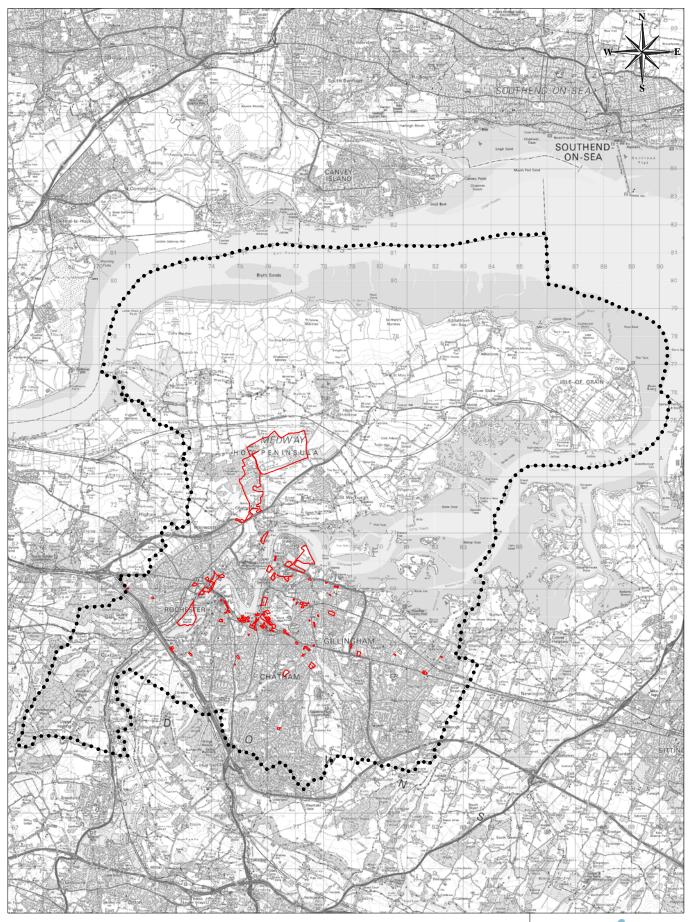
Roosevelt Avenue, Chatham	429
Sports Field, Warren Wood Road, Rochester	433
Allotments, Formby Road, Halling	434
South of Vicarage Road, Halling	435
Capstone Valley	438
Garages off Tobruk Way/Burma Way, Chatham	448
47-48 Second Avenue Industrial Estate	571
A1-A5 and F1-F3, Elm Court Estate, Capstone Road	576
Strood Service Station, 3 London Road, Strood	603
Walnut Tree Farm, 155 Lower Rainham Road, Rainham	604
Land adjacent to 45 Laker Road, Rochester	638
Grain Power Station, Grain Road	646
Kingsnorth Power Station	647
Land between Vanguard Way and Anthonys Way	648
Wilds Yard, Clipper Close, Frindsbury	652
Land adjoining Southern House, Anthonys Way	654
39-41 Mills Terrace, Chatham	669
Cuxton Station, Station Road, Cuxton	676
Diggerland, Roman Way, Strood	686
National Grid Property, Pier Road, Gillingham	687
Land at Medway Road, West of 32 Laurel Road	693
Adj 12 Street End Road, Chatham	697
National Grid Property Holdings, Grain Road	699
31-39 Duncan Road, Gillingham	703
Pit 2, Roman Way, Strood	705
LIFT site, 551-555 Canterbury Street, Gillingham	707
Allhallows Holiday Park, Avery Way	709
North side of Commissioners Road	711
HMP Rochester, Sir Evelyn Road	712
Land to East of Chattenden Lane	713
Land to east of Chattenden Lane	714
Land to West of Church Farm, Church Lane, Hoo	715
Land to the East of Toad Hall, Main Road, Hoo	716
West of Tower Hill House, Castle Street Upnor	717
Bridge Lodge, Four Elms Hill	718
90-94 Bush Road, Cuxton	722
BAE Systems, Rochester	724
North of Brompton Farm Road	729
Land at Listmas Road, Chatham	732
Amenity Land at 45-75 Chatham Grove, Chatham	733
Upnor Wharf	735
Hoo Common, Chattenden	738
Fenced area Lordswood Lane	743

Barn Meadow, Upper Halling	747
Wooleys Orchard, land south of Lower Rainham Road	749
Land Between Pump Lane & Bloors Lane, Rainham	750
BAE Sports & Social Club, Bells Lane, Hoo	751
North side of Commissioners Road, Strood	752
Land west of Hoo	753
Land at Burneys Farm, Lower Stoke	754
Land at Holy Trinity Church, Twydall Land, Twydall	764
St Lukes Church, Sidney Road, Gillingham	765
Land at Green Lane, Grain	768
Bridgewood, Rochester	773
Mill Hill, Grange Road, Gillingham	774
Bakers Field, Station Road, Rainham	775
Land at West Motney Way, Rainham	776
Trechmanns Wharf, Rochester Road, North Halling	777
Manor Farm, Lower Rainham Road, Rainham	778
Adj. To Farm Cottages, Lodge Hill Lane, Chattenden	780
218 Main Road, Hoo	781
Cuxton Gate, Station Road, Cuxton	782
Land at Capstone Valley, Darland Farm	783
Site A, west of Chapel Lane, Hempstead	784
Site B, east of Chapel Lane, Hempstead	785
Site C, land off Hoath Way, Hempstead	786
East of the Old Orchard, Merry Boys Road	789
Old Chalk Pit, Lower Rochester Road, Frindsbury	790
Former Equestrian Centre, Walnut Tree Farm Rainham	791
Middle Street Farm, Grain Road, Middle Stoke	794
Street Farmyard, Stoke Road, Hoo St Werbergh	795
Rede Court Gravesend Road	796
Holy Name Church, Lower Rainham Road	797
Land west of Lower Station Road, Rainham	800
Chattenden Farm, Lodge Hill Lane	802
Former Officers Mess, Maidstone Road, Chatham	804
Westmoor Farm, Moor Street, Rainham	814
East side of Vicarage Lane, Hoo	815
Berengrave Nusery, Rainham	817
Pump House 7, Leviathan Way, Chatham Maritime	819
Machine Shop 8 Chatham Maritime	821
Land east of Otterham Quay Lane, Rainham	825
Stonehouse Farm, Dillywood Lane, Frindsbury	827
Former Conoco Site/Thameside Terminal, Salt Lane	828
Medway Bridge Marina, Manor Lane, Rochester	829
Land at Grange Road, Gillingham	830

Land to the West of North Dane Wood, Lordswood	832
Medtha Bungalow, Port Victoria Road, Grain	833
Walnut Tree Farm, r/o Longfield Ave, High Halstow	835
Land to the East of Church Street	836
Land to the West of Church Street	837
Former Alloy Wheels Priory Road	839
Land west of Maidstone & Rochester Roads, Rochester	840
Woolmans Wood Caravan Site	845
Garage Court at Sundridge Drive, Chatham	846
Siloam Farm, Rainham	847
Land south of View Road, Cliffe Woods	848
Bennetts Orchard, Lower Rainham	849
Luton LIFT site Alexandra Road	851
296-310 High Street, Chatham	862
Former School Playing Field Halling	910
Petrol Filling Station Railway Street GILLINGHAM	976
Bridgewood Manor Hotel, Walderslade Woods, Chatham	993
Ropers Lane, Hoo St Werburgh	1009
Mount Pleasant, Cooling	1010
Daland Farm, High Halstow	1011
Off Power Station Road, Grain	1012
Sharnal Street, High Halstow	1013
Whetstead, Off Grange Road, Lower Twydall	1014
Off Sundridge Hill, Cuxton	1015
Moor Street House	1027
Mackays Lordswood Industrial Estate	1033
178 Brompton Farm Road, Strood	1042
R/O Whitehouse Farm, Stoke Road, Hoo	1043
East of Whitehouse Farm, Hoo	1044
Land at Tamarisk, Chattenden	1045
Former Reservoir, Browndens Lane, Upper Halling	1046
Land east of Seymour Road, Rainham	1047
116-118 Twydall Lane, Twydall	1050
Westmoor Farm (North) Moor Street, Rainham	1053
South section, Maidstone Road, Rochester	1055
North side, Priory Road	1057
R/O Oastview, east of Mierscourt Road, Rainham	1058
Meresborough Lane & South Bush Lane, Rainham	1059
Dudley Farm, Matts Hill Farm Road, Hartlip	1060
South of Lower Rainham Road, west of Pump Lane	1061
Shamley Road	1062
Mierscourt Farm, Rainham	1063
South of Lower Rainham Road, Mill Hill, Twydall	1064

South of Main Road, Hoo	1065
South Ratcliffe Highway, west Vidgeon Avenue, Hoo	1066
Gibraltar Farm, Ham Lane, Hempstead	1067
South of Sundridge Hill, Cuxton	1068
North Mortimers Avenue, west Town Road	1069
West of Town Road Cliffe Woods	1070
South Ladyclose Avenue, West of Town Road	1071
R/O 250 Main Road, Hoo	1072
Land at Mill Hill, Grange Road, Gillingham	1073
North Watling Street and Rede Court	1074
Land at Rectory Road, Cliffe	1075
West of Allhallows Road, Lower Stoke	1078
Land off Church Terrace, Stoke	1079
Former Gym, Site C4, North Road, Chatham Maritime	1081
Land to the west of Cliffe Woods	1082
Wayside, Meresborough Lane, Gillingham	1083
Land west of Ropers Lane, Hoo	1084
Land east of Eastcourt Lane, Gillingham	1085
Westmoor Farm, Moor Street, Rainham	1086
Land to the East of Berwick Way, Wainscott	1087
Manor Farm, Parsonage Lane	1088
Abbots Court, Stoke Road, Hoo	1090
1 Port Victoria Road, Isle of Grain	1091
3 Broad Street Cottages, Main Road, Hoo	1092
Between 102-112 Lower Rainham Road	1093
Sports Field No 3, Brompton Road, Gillingham	1094
Sports Field No 1, Inner Lines, Brompton Barracks	1096
Cooling Road, High Halstow	1103
North of St James Church Cooling	1104
Manor Farm, Marsh Road, Halling	1105
Miles Place, Delce Road, Rochester	1106
Land at Lower Bloors Lane Rainham	1108
Steelfields, Danes Hill, Gillingham	1109
Land at the Alps	1110
North of Airport	1111
Land to east of High Halstow	1113
Interface Land, Chatham Maritime (northern site)	820a

Appendix vii – Suitable Sites (Stage 2 Assessment)



Suitable SLAA sites



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Appendix vii – Suitable Housing Sites

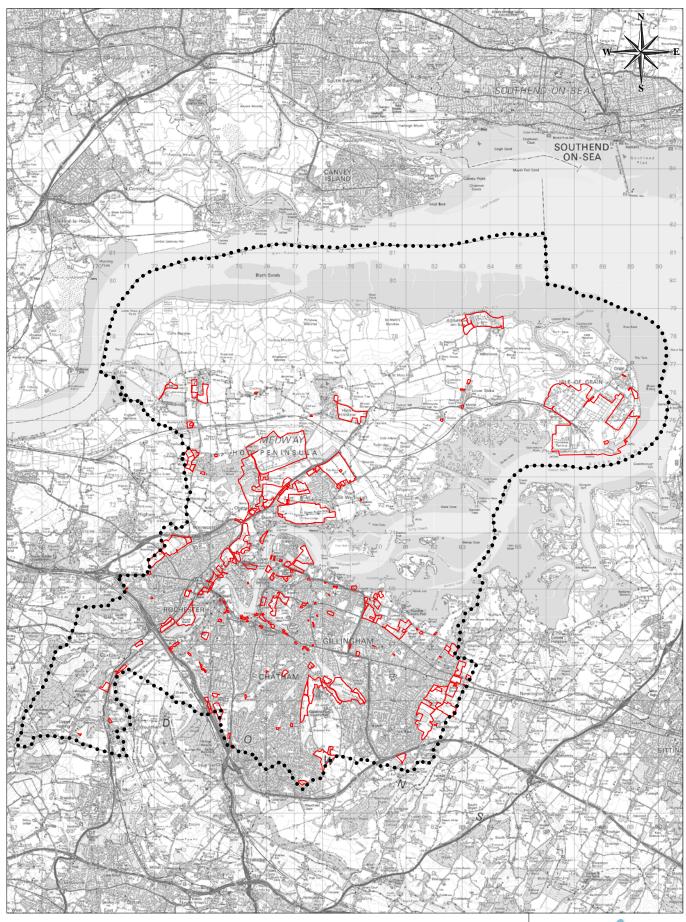
Sites with Extant Planning Permission		
Name	Reference	Units
Borough Road, Gillingham	219	9
Dormers, 3 Upper Luton Road, Chatham	248	21
Lower Upnor, RSME land	443	20
124 Pier Road Gillingham	471	8
Car Park The Terrace Rochester	484	14
Southern Water Site Capstone Road Chatham	524	69
195 Princes Avenue Walderslade	559	15
Colonial House Quayside	632	253
Temple Waterfront, Roman Way, Strood	685	620
Former Earl Community Centre, Albatross Avenue	746	18
Between Cross Street & The Brook, Chatham	757	118
Tesco, Strood	843	12
Bridgeside Warwick Crescent Rochester	914	12
Adjacent to Staples Medway Street Chatham	983	80
Adjacent to Bus Station Medway Street Chatham	984	31
26-36 Napier Road Gillingham	1018	6
Greatfield Lodge, Darnley Road, Strood	1100	21
Total		1327

Suitable SLAA Sites		
Name	Reference	Units
89 Ingram Road, Gillingham	3	5
Layfield Road	11	6
RSME Kitchener Barracks, Brompton	33	267
Retailing In Gillingham, High, Skinner, Jeffrey Strts	39	21
Lodge Hill (Chattenden) Ministry of Defence Estate	50	5000
Albert Place, Strood	81	37
Strood Riverside, Canal Road	90	394
320 - 344 High Street inc. 42 New Road, Rochester	100	51
1-35 High Street, Chatham (Grays Garage)	102	54
Civic Centre and Janes Creek	137	398
St Bartholomews Hospital, New Road, Rochester	144	108
Sports Ground, Featherby Road	158	91
East of Gillingham Golf Course	164	8
56A Pump Lane, Rainham	177	7
274-276 Station Road Rainham	182	6
Orchard Precinct Retailing, Rainham	196	40
352-356 Luton Road, Luton	213	13
Beacon Hill	236	37

Chatham-Comparison Retailing	2/12	77
	243	73
Sorting Office, The Paddock, Chatham	249	25
Safety Bay House Warwick Crescent Rochester	486	9
R/O 329 - 377 (Featherstones) High St ROCHESTER	598	120
82 Jeffery Street, Gillingham	663	6
Ex Service Stn, adj 86 Corporation Street, Roch	700	29
Land rear of former St Matthews School, Borstal	708	12
1-21 St Clements House, Corporation Street	726	0
10-40 Corporation Street, Rochester	728	26
46-86 Corporation Street, Rochester	731	27
Communal areas, John Street, Rochester	740	5
Pattens Place, Rochester	741	6
Former Police Station, Chatham	755	40
Pentagon, Chatham	756	29
Sir John Hawkins Car Park, Chatham	758	120
Whiffens Avenue Car Park, Chatham	759	70
Tesco, The Brook, Chatham	760	60
Junction of Pier Road and Medway Road, Gillingham	810	25
Meeting Hall, Queens Road, Gillingham	816	5
J7, Chatham Maritime	818	75
Interface Land, Chatham Maritime (both sites combined)	820	525
Land at Robins and Day	822	84
Chatham Docks, Chatham	824	2000
1 Batchelor Street, off the Brook, Chatham	834	50
Tesco Store, Rainham Shopping Centre	841	7
111 Rainham Road (Jezreels), Gillingham	853	9
The Brook (r/o High St and Batchelor St) Chatham	857	35
Land at High St, Union St and New Road, Chatham	860	14
141-151 New Road and land at Union Street, Chatham	861	18
King Street, Chatham	864	0
2-8 King Street and 1-11 Queen Street, Chatham	865	108
55-105a The Brook & 1, 5, 11 & 13 King St, Chatham	866	50
2-14 Railway Street & 142-146 High Street, Chatham	867	51
19 New Road Avenue and 3 New Cut, Chatham	868	42
Wickes, New Cut, Chatham	869	126
Chatham Railway Station	871	279
West of Maidstone Road, adj Chatham Rail Station	872	173
Rear of 47 High Street/Britton Street, Gillingham	873	0
Land at junc. of Marlborough Rd/Brompton Rd, Gill	874	9
Retail Core(High St,Jeffrey St,King St) Gillingham	875	91
BT Switch Centre, Green Street, Gillingham	876	17
R/O 73,75-77 High Street, Rochester	880	9
15,17,19 New Road, Chatham	896	8

Lock Up Garage Site Rear of Charles Street Chatham	959	5
National Tyre Station Road Strood	1039	20
Land at 54 Beacon Road, Chatham	1048	10
101 Beacon Road, Chatham	1052	17
6-11 New Road Avenue, Chatham	1056	15
Delivery Office Rochester High Street	1080	7
Land at Priestfield, Gillingham	1089	150
Collingwood Triangle, Brompton Barracks	1095	50
131 City Way, Rochester	1107	6
Samuels Towers, Longhill Avenue, Chatham	1112	12
Chatham Driving Range	1114	79
Total		11,381

Appendix viii – Available Sites



Available SLAA sites

Medway
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Appendix viii – Availability

Sites Name	Reference
RSME Kitchener Barracks, Brompton	33
Borough Road, Gillingham	219
Dormers, 3 Upper Luton Road, Chatham	248
Lower Upnor, RSME land	443
124 Pier Road Gillingham	471
Car Park The Terrace Rochester	484
Safety Bay House Warwick Crescent Rochester	486
Southern Water Site Capstone Road Chatham	524
195 Princes Avenue Walderslade	559
Colonial House Quayside	632
Temple Waterfront, Roman Way, Strood	685
Former Earl Community Centre, Albatross Avenue	746
Between Cross Street & The Brook, Chatham	757
Retail Core(High St,Jeffrey St,King St) Gillingham	875
R/O 73,75-77 High Street, Rochester	880
Bridgeside Warwick Crescent Rochester	914
Adjacent to Staples Medway Street Chatham	983
Adjacent to Bus Station Medway Street Chatham	984
26-36 Napier Road Gillingham	1018
National Tyre Station Road Strood	1039
Greatfield Lodge, Darnley Road, Strood	1100
89 Ingram Road, Gillingham	3
Layfield Road	11
Lodge Hill (Chattenden) Ministry of Defence Estate	50
Strood Riverside, Canal Road	90
1-35 High Street, Chatham (Grays Garage)	102
Civic Centre and Janes Creek	137
Sports Ground, Featherby Road	158
East of Gillingham Golf Course	164
56A Pump Lane, Rainham	177
274-276 Station Road Rainham	182
Beacon Hill	236
Sorting Office, The Paddock, Chatham	249
Former Cement Works, Formby Road, Halling	352
R/O 329 - 377 (Featherstones) High St ROCHESTER	598
Watermill Wharf, Canal Road, Strood	657
82 Jeffery Street, Gillingham	663
Ex Service Stn, adj 86 Corporation Street, Roch	700
Land rear of former St Matthews School, Borstal	708

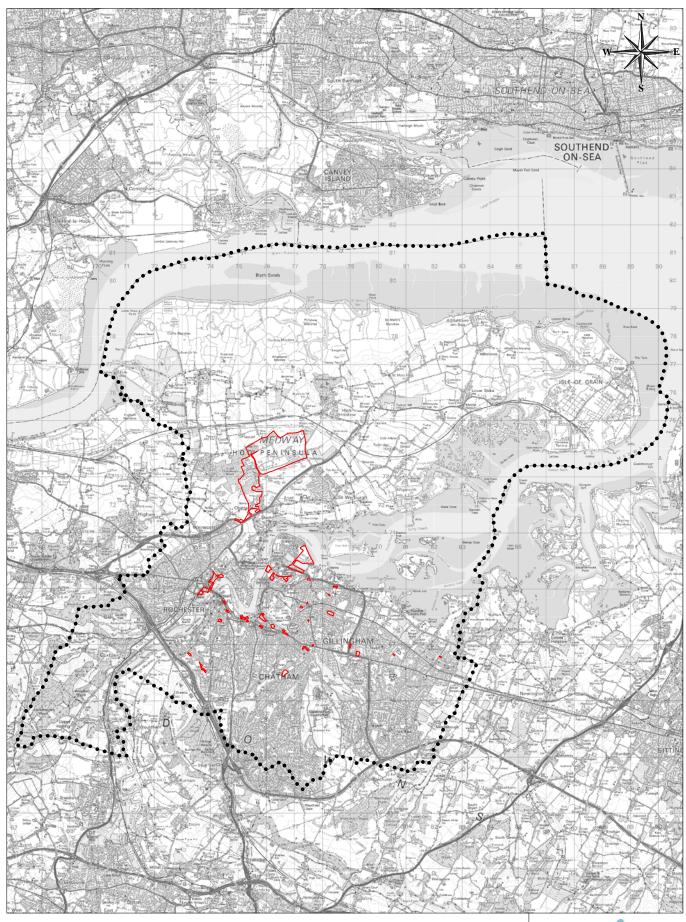
46-86 Corporation Street, Rochester	731
Communal areas, John Street, Rochester	740
Former Police Station, Chatham	755
Pentagon, Chatham	756
Tesco, The Brook, Chatham	760
Junction of Pier Road and Medway Road, Gillingham	810
Meeting Hall, Queens Road, Gillingham	816
Interface Land, Chatham Maritime (both sites combined)	820
Land at Robins and Day	822
Chatham Docks, Chatham	824
111 Rainham Road (Jezreels), Gillingham	853
BT Switch Centre, Green Street, Gillingham	876
15,17,19 New Road, Chatham	896
Land at 54 Beacon Road, Chatham	1048
101 Beacon Road, Chatham	1052
6-11 New Road Avenue, Chatham	1056
Delivery Office Rochester High Street	1080
Land at Priestfield, Gillingham	1089
Collingwood Triangle, Brompton Barracks	1095
Samuels Towers, Longhill Avenue, Chatham	1112
Chatham Driving Range	1114
Interface Land, Chatham Maritime (southern site)	820b
Sir Evelyn Road, Rochester	282
10-40 Corporation Street, Rochester	728
J7, Chatham Maritime	818
Land between Vanguard Way and Anthonys Way	648
Adj to Fort Horsted, Chatham	376
Rochester Airfield	378
A1-A5 and F1-F3, Elm Court Estate, Capstone Road	576
Walnut Tree Farm, 155 Lower Rainham Road, Rainham	604
Wilds Yard, Clipper Close, Frindsbury	652
Diggerland, Roman Way, Strood	686
National Grid Property Holdings, Grain Road	699
Pit 2, Roman Way, Strood	705
Allhallows Holiday Park, Avery Way	709
North side of Commissioners Road	711
HMP Rochester, Sir Evelyn Road	712
Land to East of Chattenden Lane	713
Land to east of Chattenden Lane	714
West of Tower Hill House, Castle Street Upnor	717
Bridge Lodge, Four Elms Hill	718
North of Brompton Farm Road	729
Amenity Land at 45-75 Chatham Grove, Chatham	733

Upnor Wharf	735
Wooleys Orchard, land south of Lower Rainham Road	749
BAE Sports & Social Club, Bells Lane, Hoo	751
Land west of Hoo	753
Land at Burneys Farm, Lower Stoke	754
Land at Green Lane, Grain	768
Bridgewood, Rochester	773
Mill Hill, Grange Road, Gillingham	774
Bakers Field, Station Road, Rainham	775
Land at West Motney Way, Rainham	776
Trechmanns Wharf, Rochester Road, North Halling	777
Land at Capstone Valley, Darland Farm	783
East of the Old Orchard, Merry Boys Road	789
Former Equestrian Centre, Walnut Tree Farm Rainham	791
Middle Street Farm, Grain Road, Middle Stoke	794
Street Farmyard, Stoke Road, Hoo St Werbergh	795
Rede Court Gravesend Road	796
Holy Name Church, Lower Rainham Road	797
Chattenden Farm, Lodge Hill Lane	802
Former Officers Mess, Maidstone Road, Chatham	804
Westmoor Farm, Moor Street, Rainham	814
Pump House 7, Leviathan Way, Chatham Maritime	819
Machine Shop 8 Chatham Maritime	821
Land east of Otterham Quay Lane, Rainham	825
Former Conoco Site/Thameside Terminal, Salt Lane	828
Medway Bridge Marina, Manor Lane, Rochester	829
Land to the West of North Dane Wood, Lordswood	832
Medtha Bungalow, Port Victoria Road, Grain	833
Walnut Tree Farm, r/o Longfield Ave, High Halstow	835
Land to the East of Church Street	836
Land to the West of Church Street	837
Former Alloy Wheels Priory Road	839
Land west of Maidstone & Rochester Roads, Rochester	840
Siloam Farm, Rainham	847
Land south of View Road, Cliffe Woods	848
Petrol Filling Station Railway Street GILLINGHAM	976
Bridgewood Manor Hotel, Walderslade Woods, Chatham	993
Moor Street House	1027
Mackays Lordswood Industrial Estate	1033
178 Brompton Farm Road, Strood	1042
R/O Whitehouse Farm, Stoke Road, Hoo	1043
East of Whitehouse Farm, Hoo	1044
Land at Tamarisk, Chattenden	1045

Former Reservoir, Browndens Lane, Upper Halling	1046
Land east of Seymour Road, Rainham	1047
116-118 Twydall Lane, Twydall	1050
Westmoor Farm (North) Moor Street, Rainham	1053
South section, Maidstone Road, Rochester	1055
North side, Priory Road	1057
R/O Oastview, east of Mierscourt Road, Rainham	1058
Meresborough Lane & South Bush Lane, Rainham	1059
Dudley Farm, Matts Hill Farm Road, Hartlip	1060
South of Lower Rainham Road, west of Pump Lane	1061
Mierscourt Farm, Rainham	1063
South of Lower Rainham Road, Mill Hill, Twydall	1064
South of Main Road, Hoo	1065
South Ratcliffe Highway, west Vidgeon Avenue, Hoo	1066
Gibraltar Farm, Ham Lane, Hempstead	1067
South of Sundridge Hill, Cuxton	1068
North Mortimers Avenue, west Town Road	1069
West of Town Road Cliffe Woods	1070
South Ladyclose Avenue, West of Town Road	1071
R/O 250 Main Road, Hoo	1072
Land at Mill Hill, Grange Road, Gillingham	1073
North Watling Street and Rede Court	1074
Land at Rectory Road, Cliffe	1075
West of Allhallows Road, Lower Stoke	1078
Land off Church Terrace, Stoke	1079
Former Gym, Site C4, North Road, Chatham Maritime	1081
Land to the west of Cliffe Woods	1082
Wayside, Meresborough Lane, Gillingham	1083
Land west of Ropers Lane, Hoo	1084
Land east of Eastcourt Lane, Gillingham	1085
Westmoor Farm, Moor Street, Rainham	1086
Land to the East of Berwick Way, Wainscott	1087
Manor Farm, Parsonage Lane	1088
Abbots Court, Stoke Road, Hoo	1090
1 Port Victoria Road, Isle of Grain	1091
3 Broad Street Cottages, Main Road, Hoo	1092
Between 102-112 Lower Rainham Road	1093
Sports Field No 3, Brompton Road, Gillingham	1094
Sports Field No 1, Inner Lines, Brompton Barracks	1096
Cooling Road, High Halstow	1103
North of St James Church Cooling	1104
Manor Farm, Marsh Road, Halling	1105
Land at Lower Bloors Lane Rainham	1108

Steelfields, Danes Hill, Gillingham	1109
Land at the Alps	1110
North of Airport	1111
Land to east of High Halstow	1113
Interface Land, Chatham Maritime (northern site)	820a
Tesco, Strood	843

Appendix ix – Suitable and Available Sites



Suitable and Available SLAA sites

Medway
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Appendix ix - Suitable and Available Sites

Site Name	Reference	
		(Units)
Sites with Extant Residential Planning Permission		
RSME Kitchener Barracks, Brompton	33	267
Borough Road, Gillingham	219	9
Dormers, 3 Upper Luton Road, Chatham	248	21
Lower Upnor, RSME land	443	20
124 Pier Road Gillingham	471	8
Car Park The Terrace Rochester	484	14
Safety Bay House Warwick Crescent Rochester	486	9
Southern Water Site Capstone Road Chatham	524	69
195 Princes Avenue Walderslade	559	15
Colonial House Quayside	632	253
Temple Waterfront, Roman Way, Strood	685	620
Former Earl Community Centre, Albatross Avenue	746	18
Between Cross Street & The Brook, Chatham	757	118
Tesco, Strood	843	12
Retail Core(High St, Jeffrey St, King St) Gillingham	875	91
R/O 73,75-77 High Street, Rochester	880	9
Bridgeside Warwick Crescent Rochester	914	12
Adjacent to Staples Medway Street Chatham	983	80
Adjacent to Bus Station Medway Street Chatham	984	31
26-36 Napier Road Gillingham	1018	6
National Tyre Station Road Strood	1039	20
Greatfield Lodge, Darnley Road, Strood	1100	21
Total		1723
Sites without Planning Permission		
89 Ingram Road, Gillingham	3	5
Layfield Road	11	6
Lodge Hill (Chattenden) Ministry of Defence Estate	50	5000
Strood Riverside, Canal Road	90	394
1-35 High Street, Chatham (Grays Garage)	102	54
Civic Centre and Janes Creek	137	398
Sports Ground, Featherby Road	158	91
East of Gillingham Golf Course	164	8
56A Pump Lane, Rainham	177	7
274-276 Station Road Rainham	182	6
Beacon Hill	236	37

Sorting Office, The Paddock, Chatham	249	25							
R/O 329 - 377 (Featherstones) High St ROCHESTER	598	120							
Watermill Wharf, Canal Road, Strood	657	19							
82 Jeffery Street, Gillingham	663	6							
Ex Service Stn, adj 86 Corporation Street, Roch 700									
Land rear of former St Matthews School, Borstal 708									
46-86 Corporation Street, Rochester	731	27							
Communal areas, John Street, Rochester	740	5							
Former Police Station, Chatham	755	40							
Pentagon, Chatham	756	29							
Tesco, The Brook, Chatham	760	60							
Junction of Pier Road and Medway Road, Gillingham	810	25							
Meeting Hall, Queens Road, Gillingham	816	5							
Interface Land, Chatham Maritime (both sites combined)	820	525							
Land at Robins and Day	822	84							
Chatham Docks, Chatham	824	2000							
111 Rainham Road (Jezreels), Gillingham	853	9							
BT Switch Centre, Green Street, Gillingham	876	17							
15,17,19 New Road, Chatham	896	8							
Land at 54 Beacon Road, Chatham	1048	10							
101 Beacon Road, Chatham	1052	17							
6-11 New Road Avenue, Chatham	1056	15							
Delivery Office Rochester High Street	1080	7							
Land at Priestfield, Gillingham	1089	150							
Collingwood Triangle, Brompton Barracks	1095	50							
Samuels Towers, Longhill Avenue, Chatham	1112	12							
Chatham Driving Range	1114	79							
Total		9391							

Medway Local Development Scheme 2015 - 2018

November 2015



Medway Local Development Scheme 2015 - 2018

November 2015

Contents

- 1. Introduction
- 2. Update to Local Development Scheme
- 3. Resources and project management
- 4. Contact information

Appendix i: Timetable of key stages

1. Introduction

- 1.1 This Local Development Scheme provides an updated programme for the production of a new local plan that will provide the basis for development policy in Medway. The scheme covers the period from 2015 to 2018, and updates the Medway Local Development Scheme published in June 2014.
- 1.2 The Planning and Compulsory Purchase Act 2004, as amended, requires local planning authorities to prepare, maintain and publish a Local Development Scheme (LDS). The first Medway Local Development Scheme was published in April 2005, and subsequently updated in 2007, 2008, 2009, 2011 and 2014. The LDS provides public information on the process and timetable for the preparation and review of local development documents, and is used by the council to help plan resources and workstreams. It allows the community and stakeholders to find out about the council's intentions for the planning of Medway, and when they can participate in the plan making process.
- 1.3 The National Planning Policy Framework, 2012, stated that each local planning authority should produce a Local Plan for its area. The government has restated its commitment to a 'plan led' development process, and is increasing its expectations that all local planning authorities have an up-to-date plan in place. The Productivity Plan released on 10 July 2015 stated government's intention to set a deadline by which all councils must put local plans in place. A written statement from the Housing and Planning Minister on 21 July confirmed this deadline to be early 2017.

2. Update to Local Development Scheme

- 2.1 The Council has commenced work on a new Local Plan, which is the focus of this Local Development Scheme. This has involved preparation of an evidence base on development needs and land availability. The new Local Plan will be a comprehensive planning document, including strategic level and development management policies, land allocations, minerals and waste, and a policies map. The Local Plan will cover the whole of Medway, and will be prepared in conformity with national planning legislation, specifically the National Planning Policy Framework. On adoption it will replace the saved policies from the Medway Local Plan 2003. The Local Plan is a Development Plan Document (DPD).
- 2.2 A timetable for the preparation of the replacement Local Plan is set out at Appendix 1. This has introduced a Preferred Options consultation stage in early 2017. This step has been taken to allow due consideration of the outcome of the Public Inquiry into the planning application for a strategic mixed use development at Lodge Hill. The Public Inquiry is due to be held in 2016, and the outcome is critical to the council's assessment of the development strategy options to

underpin the new local plan. Consultation on the initial Issues and Options stage will take place in January and February 2016, avoiding the Christmas period and thereby facilitating more effective public engagement in the process.

- 2.3 In preparation for the new Local Plan, the Council has reviewed its Statement of Community Involvement and adopted an updated version in September 2014. This provides the basis for effective and meaningful engagement in the preparation of the new Local Plan.
- 2.4 The Council is preparing its Community Infrastructure Levy (CIL) charging schedule to align to the work on the Local Plan.
- 2.5 The Council will meet the requirements of sustainability appraisal throughout the plan preparation process, carrying out iterative appraisals of the sustainability of the options, proposals and draft policies in the emerging Local Plan and prepare reports setting out the findings. This will be carried out at the key stages of plan preparation. The Council will consult on the Sustainability Appraisals in line with its Statement of Community Involvement. The recommendations from the Sustainability Appraisals will be addressed in the emerging Local Plan.
- 2.6 Neighbourhood Plans were introduced in the Localism Act in 2011. They are not compulsory, but when duly prepared they are a statutory document that forms part of the development plan. Neighbourhood plans must be in general conformity with the strategic policies of the adopted local plan, and have regard to any emerging local plans or relevant development plan documents. In June 2015, the first Neighbourhood Area in Medway was designated for the purpose of preparing a Neighbourhood Plan in Cliffe and Cliffe Woods. The timetable for the preparation of the Neighbourhood Plan is set by the parish council and its project steering group. Medway Council is liaising with the Neighbourhood Planning group to share appropriate information and aid coordination of work.

3. Resources and project management

- 3.1 Medway Council has strong corporate commitment to the adoption of a replacement Local Plan, and the importance of this work is recognised and supported across the authority. The Medway Local Plan will be produced by the Council's Planning Service, with the work being led by the Planning Policy team.
- 3.2 The Council will seek to use its processes of community involvement and engagement and its Duty to Cooperate activities and organisations to help inform and develop the plan, making effective use of intelligence and resources.
- 3.3 The Council has established management and reporting structures to support the delivery of the local plan, including the use of briefings and

reporting to senior managers and members throughout the plan preparation process. There is a dedicated cross party member advisory group supporting the production of the local plan.

Reporting progress

- 3.4 The Council will publish this updated Local Development Scheme on its website and make it available for inspection at the Council's offices at Gun Wharf.
- 3.5 Progress on the Local Plan and supporting activities, such as demonstrating that the Duty to Cooperate is being met in the preparation of the plan, will be reported annually in the Authority's Monitoring Report that is published each December on the Council's website:

(http://www.medway.gov.uk/planningandbuilding/planningpolicy/authoritymonitoringreport.aspx)

3.6 The report will show the progress being made on the Local Plan, and the degree of compliance with the LDS.

4. Contact information

Further information about Medway's planning policy work is available on the Council's website at: www.medway.gov.uk/planningpolicy or by contacting the Planning Policy team at:

Address:

Planning Policy team
Housing & Regeneration
Regeneration, Community & Culture
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR

Email: planning.policy@medway.gov.uk

Telephone: 01634 331629

APPENDIX i

Timetable for Medway Local Plan – key milestones

	20	15	5 2016				2017								2018																							
	Ν	D	J	F	М	Α	М	J	J	Α	S	0	Ν	D	J	F	М	Α	М	J	J	Α	S	О	Ζ	П	J	F	М	Α	М	J	ے	Α	S	0	Ν	D
LDS update																																						
Issues & Options																																						
Preferred Options																																						
Publication																																						
Submission																																						
Adoption																																						

Strategic Access Management and Mitigation Medway Council Interim Policy Statement

November 2015

1. Purpose

1.1 This policy statement sets out the council's position on a strategic approach to managing and mitigating the potential impact to the protected habitats of the Thames, Medway and Swale Estuary and Marshes Special Protection Areas and Ramsar sites. In advance of adopting an appropriate policy in an updated Medway Local Plan, the council is establishing its commitment to a strategic mitigation and management approach, to satisfy the requirements of the Conservation and Habitats and Species Regulations, 2010.

2. Context

- 2.1 Much of the estuary and marshes along the north Kent coast on the Thames, Medway and Swale are designated Special Protection Areas, or Ramsar sites in recognition of their international importance for wildlife, in particular wintering birds. These designations establish legal requirements for the protection of these special environments, and specific duties on local authorities, particularly with regards to planning.
- The Conservation of Habitats and Species Regulations 2010 (known as the 'Habitats Regulations') set out how Local Planning Authorities must deal with planning applications that have the potential to impact on Special Protection Areas and other European protected sites. As a matter of national policy, the Habitats Regulations also apply to Ramsar Sites. The legislation states that local planning authorities must not grant permission for a development that would, either alone or in-combination with other developments, have a likely significant effect on a European protected site. Only if any likely significant effects can be mitigated can permission be granted.
- 2.3 Over 1,000 new homes are planned to be built each year in North Kent cumulatively these could have a considerable impact on the three Special Protection Areas and Ramsar sites, with each new home potentially contributing to that cumulative impact. Research ¹ carried out in north Kent has found that there have been marked declines in the numbers of birds using the SPAs, and these have occurred at the locations with the highest levels of access. It identified that disturbance caused by the presence of people was a potential cause of the decline. A range of activities were found to create

¹ Bird Disturbance Study, North Kent 2010/11. Footprint Ecology, 2011. Available at: http://www.medway.gov.uk/pdf/Final%20North%20Kent%20Bird%20Report.pdf

disturbance. Walking dogs off the lead had a noted impact, but also running and cycling.

- 2.4 It identified that 75% of visits to the coast originated from within 6km. Beyond the 6km threshold there is a measurable decline in visitors coming to the coast. It was estimated that there would be 15% additional coastal recreation resulting from new housing planned in the surrounding area.
- 2.5 The research concluded that a likely significant effect cannot be ruled out from residential developments within six kilometres of the coastal designated sites and from larger residential developments further away. This is therefore a consideration when determining planning applications.

3. Addressing the Issue

- 3.1 Further work² was undertaken to develop a response to this issue. This identified that a strategic approach to management and mitigation was the most appropriate measure. The research identified a suite of strategic access, management and monitoring projects, which combine to deliver complementary measures capable of addressing a 15% increase in visitor numbers. These include wardening, development of a code of conduct, targeted activities with dog owners, management of access and site works, and ongoing monitoring.
- 3.2 The strategic package of mitigation and management measures was costed, and from this a tariff was calculated. It was recommended that the tariff should be applied to new development within 6km of the SPAs and Ramsar sites, addressing the impact from projected increases in the population of north Kent. This was established at £223.58 per new dwelling within the 6km buffer, based on an assumed increase of 35,000 dwellings in the area.
- 3.3 Natural England has worked with the North Kent local planning authorities on the measures that are necessary to mitigate the effects of recreational disturbance on the protected sites and has issued advice³ in August 2015 It advises the council that the likely significant effect of recreational impact on the over wintering bird interest from new residential development can be screened out if an appropriate contribution is made to the provision of strategic access management measures across the north Kent marshes. This relates to development within 6km of the SPA/ Ramsar sites.

² Thames, Medway and Swale Estuaries - Strategic Access Management and Monitoring Strategy, Footprint Ecology 2014. Available at: http://www.medway.gov.uk/pdf/Strategic-Access-and%20RecreationManagementPlan.pdf

³ Available at: http://www.medway.gov.uk/pdf/NKEPG%20Letter%20-%206%20August%202015.pdf

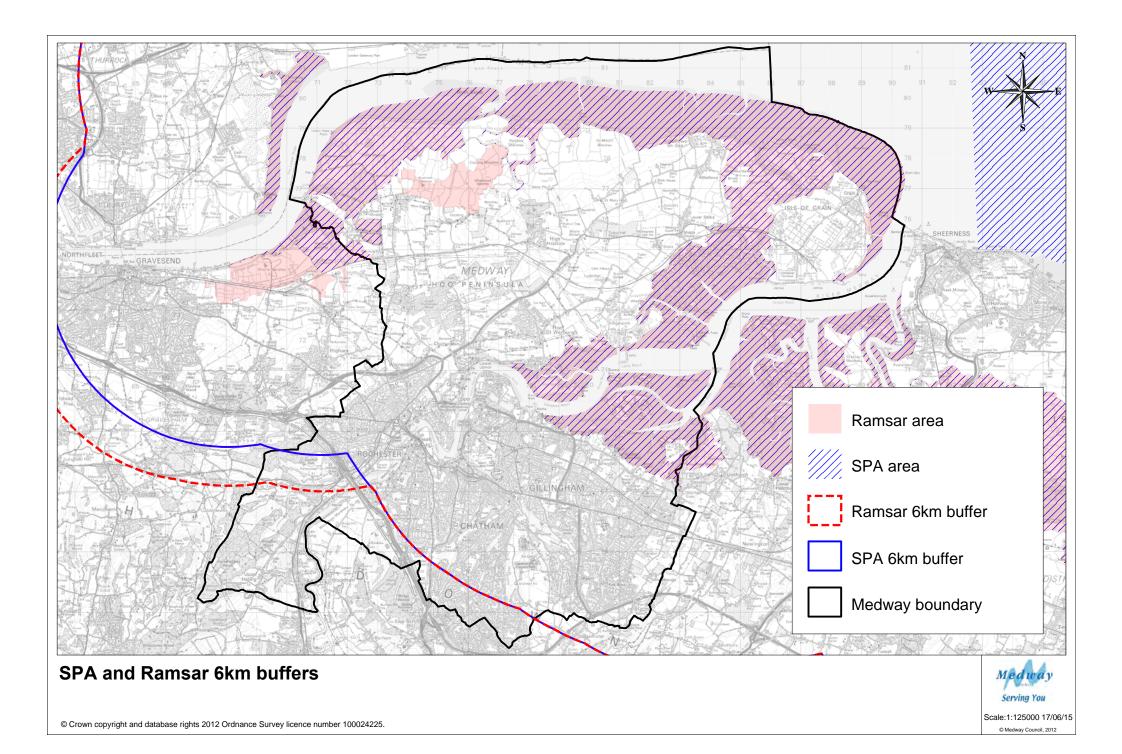
4. Implementation

- 4.1 The council will work in collaboration with local planning authorities in north Kent to contribute to the delivery of a strategic access mitigation scheme to address potential damage from population increases on the designated habitats of the Thames, Medway and Swale Estuaries and Marshes.
- 4.2 Natural England has advised that one single dwelling can cause an impact and so planning applications for development of 1 dwelling or more that fall within within 6 km of the SPAs/Ramsar sites should either contain sufficient information to enable the Local Authority to undertake an Appropriate Assessment under the Habitats Regulations; or Medway Council would expect to secure a financial contribution. Medway Council have therefore drafted a Unilateral Undertaking⁴ for the purposes of securing the contribution, which is £223.58 per dwelling. It is noted that this figure is index linked and subject to review based on monitoring the implementation of the scheme.
- 4.3 Natural England's advice sets out further details for other categories of development, and this will be followed by the council. Other uses, including hotels / guesthouses, residential care homes / institutions and camp / caravan sites will be looked at on a case-by-case basis. Furthermore Natural England advise that large developments beyond the 6km zone could also cause impacts and these will again be considered on a case-by-case basis.

5. Conclusion

- 5.1 Medway Council confirms its support for implementation of the mitigation as a partnership between the North Kent local authorities, and contribute funding collected through the tariff to a pooled budget to implement the strategic approach.
- 5.2 The council will participate in the establishment and operation of governance structures, coordination of activities, and commissioning of projects as appropriate.
- 5.3 The extent of the 6 km buffer is set out overleaf.

⁴ Available at:





Appendix 7i

TITLE Name/description of the issue being assessed	Consultation on Issues and Options stage of Medway Local Plan preparation
DATE Date the DIA is completed	5 November 2015
Name and title of person responsible for carrying out the DIA.	Catherine Smith Planning Manager - Policy

1 Summary description of the proposed change

- What is the change to policy/service/new project that is being proposed?
- How does it compare with the current situation?

The council is embarking on consultation on 'Issues and Options' to inform the preparation of a new local plan for Medway. Once adopted the plan will replace the 2003 Medway Local Plan and provide the basis for decisions on development in Medway.

This is an early stage of the plan preparation process and the document does not include specific development sites or draft policies. Rather it sets out the context of the social, environmental and economic issues in Medway that the new local plan will need to address.

As the local plan considers a broad range of needs for land, including for homes, jobs, services, infrastructure, and protecting the natural and historic environment, its impacts apply across the whole of Medway's area and its communities.

The new local plan must look at meeting development needs over the next 20 years. This will include allocating more land for housing development, employment and retail uses, infrastructure and services. It is projected that Medway's population will grow to 322,700 people by 2035, and that there will be changes in its demographic characteristics, eg, a higher proportion of older people.

2 Summary of evidence used to support this assessment

- Eg: Feedback from consultation, performance information, service user records etc.
- Eg: Comparison of service user profile with Medway Community Profile

The Issues and Options consultation document has been informed by the latest population and household projections published by government. It also includes research commissioned by the council into a range of housing needs, economic and retail issues. It uses a wide range of reference documents, plans and strategies to identify issues in Medway.



The document has been produced for the purpose of consultation at an early stage of the plan making process. The responses to the consultation will be recorded and reported by the council. The information gathered will be used to inform the local plan, and the council will report on how it has taken these responses into consideration in developing the next stage of the plan.

3 What is the likely impact of the proposed change? *Is it likely to :*

- Adversely impact on one or more of the protected characteristic groups?
- Advance equality of opportunity for one or more of the protected characteristic groups?
- Foster good relations between people who share a protected characteristic and those who don't?

(insert ✓ in one or more boxes)

	(ident : in one of more be	
Protected characteristic groups	Adverse impact	Advance equality	Foster good relations
Age		✓	
Disabilty		✓	
Gender reassignment		√	
Marriage/civil partnership		√	
Pregnancy/maternity		✓	
Race		/	
Religion/belief		✓	
Sex		✓	
Sexual orientation		√	
Other (eg low income groups)		✓	

4 Summary of the likely impacts

- Who will be affected?
- How will they be affected?

The local plan will consider the needs of Medway's population, making provision for land for homes, jobs, services, shops and infrastructure. The development of the plan seeks to promote improved opportunities for local communities.



In carrying out the consultation, the council will seek to engage a broad range of different sectors of Medway's communities. The process will include different methods of consultation to support meaningful engagement.

5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

- Are there alternative providers?
- What alternative ways can the Council provide the service?
- Can demand for services be managed differently?

The council must produce an updated Local Plan. In doing so, it will seek to understand the needs of different sectors of Medway's communities and take this into account in developing planning policies.

6 Action plan

 Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
Review outcome of consultation on Issues and Options	CS	March 2016
Undertake DIA on draft policies as Local Plan progresses	CS	November 2016

7 Recommendation

The recommendation by the lead officer should be stated below. This may be:

- to proceed with the change, implementing action plan if appropriate
- consider alternatives
- gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

To proceed with the consultation on the Issues and Options document to inform the preparation of the new Medway Local Plan.

To review the outcome of the consultation process to understand needs of different sectors of Medway's communities.

To undertake a DIA on the draft policies of the emerging Local Plan.



8 Authorisation

The authorising officer is consenting that:

- the recommendation can be implemented
- sufficient evidence has been obtained and appropriate mitigation is planned
- the Action Plan will be incorporated into service plan and monitored

Assistant Director

Date

Contact your Performance and Intelligence hub for advice on completing this assessment

RCC: phone 2443 email: annamarie.lawrence@medway.gov.uk

C&A: (Children's Social Care) contact your normal P&I contact

Send completed assessment to the Corporate Performance & Intelligence Hub (CPI) for web publication

(corppi@medway.gov.uk)



Appendix 7ii

TITLE

Name/description of the issue being assessed Strategic Access Management and Mitigation scheme to address potential damage arising from recreational disturbance to the protected habitats of the Special Protection Areas and Ramsar sites

DATE

Date the DIA is completed

5 November 2015

LEAD OFFICER

Name and title of person responsible for carrying out the DIA.

Catherine Smith Planning Manager - Policy

1 Summary description of the proposed change

- What is the change to policy/service/new project that is being proposed?
- How does it compare with the current situation?

This seeks to establish a policy to implement a Strategic Access Management and Mitigation scheme to address potential damage arising from recreational disturbance to the protected habitats of the Special Protection Areas and Ramsar sites.

Research has found that the people visiting the estuaries and marshes around the north Kent coast can damage the birdlife of these protected areas. The council is seeking to collaborate with neighbouring authorities in implementing a strategic approach to mitigate against potential damage arising from additional visitors to the coast resulting from new developments in north Kent.

The scheme will involve the collection of a tariff from developers for planning consents on new dwellings within a 6km buffer of the designated areas. The tariff will be used to fund a package of measures to mitigate the potential of recreational disturbance on the protected habitats. This in response to advice issued by the government's environmental adviser, Natural England (NE).

2 Summary of evidence used to support this assessment

- Eg: Feedback from consultation, performance information, service user records etc.
- Eg: Comparison of service user profile with Medway Community Profile

The approach has been developed in response to research findings that identified disturbance to the birdlife of the internationally important estuaries and marshes of north Kent, and is based on further studies and existing tested schemes in other parts of the country. NE has advised that it considers this approach appropriate to satisfying the requirements that the Conservation of Habitats and Species Regulations, 2010 places on the council.



3 What is the likely impact of the proposed change?

Is it likely to:

- Adversely impact on one or more of the protected characteristic groups?
- Advance equality of opportunity for one or more of the protected characteristic groups?
- Foster good relations between people who share a protected characteristic and those who don't?

(insert ✓ in one or more boxes)

Protected characteristic groups	Adverse impact	Advance equality	Foster good relations
Age		-	
Disabilty		-	
Gender reassignment		-	
Marriage/civil partnership		-	
Pregnancy/maternity		-	
Race		-	
Religion/belief		-	
Sex		-	
Sexual orientation		-	
Other (eg low income groups)		-	

4 Summary of the likely impacts

- Who will be affected?
- How will they be affected?

It is considered that the policy has a neutral impact on the different sectors of Medway's communities, and would not have a detrimental impact on any protected characteristics groups.

5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

- Are there alternative providers?
- What alternative ways can the Council provide the service?
- Can demand for services be managed differently?



N/A

6 Action plan

 Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
Review monitoring information on visitor behaviour gathered through operation of scheme to identify any if any issues have arisen that may impact on equality of opportunity.	TBC	March 2018

7 Recommendation

The recommendation by the lead officer should be stated below. This may be:

- to proceed with the change, implementing action plan if appropriate
- consider alternatives
- gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

Request that the project manager for the new scheme review monitoring information on visitor behaviour gathered through operation of scheme to identify any if any issues have arisen that may impact on equality of opportunity.

Information to be reported to partnership board to determine if any action required.

8 Authorisation

The authorising officer is consenting that:

- the recommendation can be implemented
- sufficient evidence has been obtained and appropriate mitigation is planned
- the Action Plan will be incorporated into service plan and monitored

Assistant Director

Date

Contact your Performance and Intelligence hub for advice on completing this assessment

RCC: phone 2443 email: annamarie.lawrence@medway.gov.uk

C&A: (Children's Social Care) contact your normal P&I contact

C&A (all other areas): phone 1481 email: paddy.cahill@medway.gov.uk
BSD: phone 2472/1490 email: corppi@medway.gov.uk
PH: phone 2636 email: david.whiting@medway.gov.uk

Send completed assessment to the Corporate Performance & Intelligence Hub (CPI) for web publication (corppi@medway.gov.uk)