



MEDWAY LOCAL PLAN (SETTING THE DIRECTION FOR MEDWAY 2040) REGULATION 18 CONSULTATION REPRESENTATIONS

Prepared on behalf of Uniper Ltd

October 2023

On behalf of **Uniper Ltd**

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1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Uniper Ltd in response to Medway Council's Local Plan (Setting the Direction for Medway 2040) Regulation 18 Consultation published in September 2023. Uniper is progressing the redevelopment of the former Kingsnorth Power Station site and also own the Grain Power Station and therefore have a direct interest in the Local Plan and the long-term development strategy for Medway.
- 1.2 The **former Kingsnorth Power Station** is an extant employment allocation (Policy S12: Kingsnorth) within the adopted Medway Local Plan (2003). The Plan identifies Kingsnorth as a 'Strategic Development' with the potential for Class B2 (Industrial Development) and Class B8 (Storage and Distribution) development.
- 1.3 Uniper secured Outline Planning Permission in August 2023 for redevelopment of the former Kingsnorth Power Station site (known as **MedwayOne**) for a range of employment uses (Outline Planning Permission ref. MC/21/0979). Reserved Matters Applications for the detailed design of development plots and the infrastructure estate road, associated lighting, landscape, drainage and ecological areas are now being prepared by Uniper and occupiers. A site location plan is included at **Appendix 1**.
- 1.4 The site was submitted to the Call for Sites exercise undertaken in February 2023 (Site ID: HHH36).
- 1.5 **Grain Power Station** forms part of the existing employment allocation for the Isle of Grain (Policy S13) as identified within the 2003 Medway Local Plan. The policy allows for Class B1 (Business) (now E(g)), Class B2 (General Industry) and Class B8 (Storage and Distribution) Uses.
- 1.6 The Grain Power Station site is currently in use as a Combined Cycle Gas Turbine (CCGT) and combined heat and power (CHP) plant and was acquired by Uniper in 2011. The wider site has potential for further Energy and B2/B8/E(g)(iii) Uses. The site was submitted to the Call for Sites exercise (Site ID: AS26) undertaken in February 2023. A site location plan is included at **Appendix 2**.
- 1.7 Both Sites are longstanding existing employment allocations within the extant Medway Local Plan (2003) and comprise brownfield sites. MedwayOne is due to deliver the first units in 2024/2025, subject to approval of Reserved Matters Applications. Anticipated timescales for commencement of delivery for Grain Power Station are likely to be within the early part of the new Local Plan period.

- 1.8 These representations focus on the strategic issues that are associated with the redevelopment of the Former Kingsnorth Power Station (Appendix 1) and future re-development proposals at the Grain Power Station (Appendix 2).
- 1.9 Notwithstanding our Client's specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework [NPPF] (September 2023) and National Planning Practice Guidance [NPPG] (March 2014, as amended).

i) Content of Representations

- 1.10 The consultation document and the strategy for the preparation of a new Local Plan, has been assessed on the basis of National policies as set out in Section 2.0. These representations are structured as follows:
- Section 2.0 – National Planning Policy;
 - Section 3.0 – Response to Consultation;
 - Section 4.0 – Conclusions.

2. National Planning Policy & Strategic Policy

i) National Policy & Plan Making

2.1 The NPPF (September 2023) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. (Paragraph 8)

2.2 Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- Local Plans should meet objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted. (Para 11)

- 2.3 The NPPF notes that the planning system should help create the conditions in which businesses can invest, expand and adapt. Accordingly, significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. (Para 81).
- 2.4 To meet these objectives, Para 82 directs that planning policies should:
- Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
 - Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
 - Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
 - Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.
- 2.5 Furthermore, planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. (Para 83)
- 2.6 LPAs should ‘submit a plan for examination which it considers is “sound” – namely that is:
- Positively prepared – the plan should be prepared based on a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – the plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
 - Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant. (Para 35)

2.7 The NPPF requires that Local Plans should:

- be prepared with the objective of contributing to the achievement of sustainable development;
- be prepared positively, in a way that is aspirational but deliverable;
- be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation; and
- serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). (Paragraph 16).

2.8 Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. (Para 22)

2.9 Furthermore, strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies). (Para 23)

2.10 The NPPF directs that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. (Para 31)

ii) National Planning Practice Guidance

2.11 The National Planning Practice Guidance (NPPG) builds on the principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance.

2.12 The NPPG provides guidance to support LPAs in objectively assessing and evidencing development needs including economic development. A robust evidence base will need to be

developed, in liaison with the business community, to understand their current and potential future requirements. An assessment of the appropriate functional economic market area; existing employment land stock; recent pattern of employment land supply and loss; evidence of market demand; wider market signals and evidence of market failure will need to be undertaken. [Para: 026 Ref ID: 2a-026-20190220]

- 2.13 In relation to ensuring sufficient land is allocated for logistics, the NPPG notes that an assessment of need should be informed by engagement with logistics developers and occupiers to understand the changing nature and requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies; analysis of market signals including trends in take up and the availability of logistics land and floorspace across the relevant market geographies; analysis of economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector; and engagement with Local Enterprise Partnerships and review of their plans and strategies, including economic priorities within Local Industrial Strategies. [Para: 031 Ref ID: 2a-031-20190722]
- 2.14 The NPPG confirms the relationship between the work of the South East Local Enterprise Partnership (SELEP) and LPAs within the planning process:

The commitment of local planning authorities to work collaboratively with Local Enterprise Partnerships across their area will be vital for the successful delivery of policies for strategic growth in their Local Plans. An effective policy framework for strategic planning matters, including local or aligned planning policies, will be a fundamental requirement for this” [Para ID:9-006-20160519]

iii) **Planning for Growth Written Ministerial Statement (March 2011)**

- 2.15 Ministerial Statements represent material considerations in the context of policy evaluation. The Written Ministerial Statement ‘Planning for Growth’ (March 2011) remains relevant and sets out the steps that the Government expects local planning authorities to take to ensure that the planning system does everything it can to help secure a swift return to economic growth.
- 2.16 The Written Ministerial Statement incorporates the following provisions:
- The Government’s clear expectation is that the answer to development and growth should wherever possible be ‘yes’, except where this would compromise the key sustainable development principles set out in national planning policy; and
 - When deciding to grant planning permission local planning authorities should take into account the need to maintain a flexible and responsive supply of land for key sectors,

including business; consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies and ensure they do not impose unnecessary burdens on development.

a) South East Local Enterprise Partnership

- 2.17 The South East Local Enterprise Partnership (SELEP) is the business-led public/private body established to drive economic growth across East Sussex, Essex, Kent, Medway, Southend and Thurrock. The LEP is one of 38 partnerships set up by the Government to be the key body determining strategic economic priorities while making investments and delivering activities to drive growth and create local jobs.
- 2.18 The SELEP Economic Strategy Statement (2018) notes that analysis of SELEP's industrial mix indicates that it has considerable diversity – both at the level of the LEP overall, and within its four economic areas. At the level of the LEP overall, two sectors – construction and transport and logistics – stand out as having particularly high relative concentrations of employment (reflecting the scale of the South East's growth agenda and its 'gateway location'.
- 2.19 Strategic infrastructure priorities for transport are noted including the proposed Lower Thames Crossing and it is recognised that it is important that a scheme of this size maximises the potential benefits and minimises the impacts on local business and communities. The Strategy notes that the Lower Thames Crossing will provide more than 90% additional road capacity across the Thames east of London.
- 2.20 The South East LEP was previously in the process of preparing a Local Industrial Strategy (LIS) to set out broad priorities, aligned with the National Industrial Strategy and the evidence that supports it. This work has since been incorporated into the Economic Recovery and Renewal Strategy (March 2021) which recognises the economic impact of the Covid-19 pandemic together with the UK leaving the EU and seeks to provide a plan for economic recovery and growth. The impact of these events has resulted in an estimated potential reduction of £10bn GVA for the SELEP economy within the South East of England. The South East LEP has made a number of commitments to their partners and business community to understand the impacts on the economy, to inform Government on what the South East needs, and to take clear and decisive action to support businesses to adapt and support a path to renewal. This includes through attracting and encouraging more commercial investment into the South East, as well as public funding to create jobs now and secure growth in the future.

2.21 The Economic Recovery and Renewal Strategy highlights the SELEP's commitment to 'clean growth' by rebuilding the economy through boosting local carbon industries while cutting emissions in the move to the UK's 2050 net-zero carbon target. In this regard, the SELEP is working with Coast to Capital and Enterprise M3 to create an Energy Strategy for the South East which will encourage the growth of the low carbon sector for jobs, skills and prosperity and help to deliver on the Government's Ten Point Plan for a green industrial revolution.¹

b) Thames Estuary 2050 Growth Commission

2.22 The Thames Estuary 2050 Growth Commission was set up to develop an ambitious vision and delivery plan for North Kent, South Essex and East London. The Commission defines these areas into City Ribbon, Inner Estuary, South Essex Foreshore, North Kent Foreshore and the River Thames. The vision for the Thames Estuary 2050 places a focus on developing strong and specific sectors; connecting to and enhancing natural assets and green infrastructure; and planning for long term and resilient development.

2.23 The vision aims to deliver:

- 1.3 million new jobs;
- £190 billion* additional GVA;
- At least 1 million new homes.

* Assuming an annual average growth rate of 1.25% at current GVA per job.

2.24 The Site is located within an area described in the Commission's report as 'North Kent Foreshore', which includes Medway, Swale, Canterbury and Thanet. The Hoo Peninsula is noted within the reports as one of the key priority areas for the Commission and an 'Area of Change'. The report states that there are significant opportunities for growth and development of the North Kent Foreshore.

c) Kent and Medway Growth and Infrastructure Framework (2018 update)

2.25 The Kent and Medway Growth and Infrastructure Framework (GIF) has been prepared by Kent County Council (KCC) to provide a strategic view of emerging development and infrastructure requirements to support growth across Kent and Medway. The GIF aims to provide a strategic framework across the County, for identifying and prioritising investment across a range of infrastructure, for planned growth up to 2031.

¹ The Ten Point Plan for a Green Industrial Revolution (Building back better, supporting green jobs, and accelerating our path to net zero). Published November 2020

- 2.26 The 2018 update to the Kent and Medway GIF – A 2050 Picture of Kent and Medway predicts that £16.4 billion investment in infrastructure is required to unlock the growth potential of the area. The document provides four different scenarios depending on Kent and Medway’s growth trajectory, demonstrating challenges and opportunities.

3.0 Response to Consultation

i) Vision for Medway

- 3.1 We support the economic vision for Medway, and it is encouraging to see that the strategic importance of the former Kingsnorth Power Station and Grain Power Station sites is recognised as a key part of delivering the economic growth within Medway across the Plan period. The vision for Medway places a strong emphasis on delivering growth which responds and adapts to climate change, providing for more sustainable and resilient development. It is positive that the vision recognises the challenges faced by climate change and we note that the MedwayOne development and future proposals at Grain Power Station will support the delivery of these objectives through the delivery of sustainable energy generation uses and high-quality modern employment development for industrial, manufacturing and storage and distribution uses with integrated sustainability measures and use of renewable energy.
- 3.2 The vision sees the MedwayOne and Grain Power Station sites on the Hoo Peninsula as being “transformed into thriving economic hubs” by 2040. We welcome the recognition of the strategic role that these key sites will play in delivering Medway’s economic vision on the Hoo Peninsula.
- 3.3 The MedwayOne development will provide a vital contribution towards strategic growth, generating over 2,000 jobs and delivering £48 million economic output per annum once the site is fully occupied. The energy hub will generate electricity and heat using fuel derived from waste which will be used on site and off site. The development will also provide for a network of blue and green infrastructure across the site, provision of 10% biodiversity net gain, and inclusion of renewable energy across the wider site. A package of financial contributions towards sustainable travel and highways improvements has also been secured as part of the permission to mitigate the impact of the development.
- 3.4 The redevelopment of both Sites will be closely aligned with the principles of sustainable development as set out within the NPPF and supported within the consultation document in the following ways: -

Social

- Support the delivery of sustainable communities by providing local employment opportunities alongside planned housing growth;
- Enhancing access to local employment opportunities through the provision of additional new floorspace; and
- Help residents to enjoy a better quality of life and address social inequalities through access to new additional jobs.

Environmental

- Will make the most efficient use of brownfield land, reducing the need for greenfield release;
- Will provide employment opportunities alongside planned strategic housing development on the Peninsula, reducing the need for residents to travel long distances to access employment opportunities;
- The Sites could support energy uses and in respect of Grain Power Station, the transition to a net-zero energy system through carbon capture; and
- The Sites are located in defended flood zone 3 and development will not increase the risk of flooding on or off the Site.

Economic

- Will contribute to meeting the employment needs in the District;
- Will improve the provision of jobs and business to reduce unemployment;
- Contribute to increasing the number and variety of businesses in Medway through the provision of new employment/commercial floorspace;
- Encourage inward invest through the provision of new floorspace promoting further growth;
- Provide local employment opportunities to serve the needs of the local community and planned strategic development on the Peninsula.

3.5 The consultation document recognises that there is significant potential for strategic housing growth on the Peninsula across the Plan period. Bringing forward both housing and economic development within this location would provide future residents with local employment opportunities, reducing levels of commuting out of the local area and supporting sustainable travel patterns. The redevelopment of both MedwayOne and the Grain Power Station sites would support this, contributing to the creation of sustainable development/communities. However, a vital part of unlocking this future growth will be to ensure that key infrastructure is provided to support the levels of growth envisaged. This includes major transport network improvements and investment in public transport infrastructure.

ii) Securing jobs and developing skills for a competitive economy

3.6 We support the strategic objectives set out under this heading and note that MedwayOne and Grain Power Station sites will provide for high quality employment floorspace that meets commercial requirements from occupiers.

- 3.7 We welcome the recognition that the delivery of infrastructure will be required to provide accessible employment locations to support business growth. Furthermore, key strategic transport infrastructure priorities are highlighted within the consultation document including the Lower Thames Crossing and improvements to M2 Junction 1.

iii) Development Needs

- 3.8 Para. 5.7 identifies critical transport infrastructure constraints which may hinder growth including capacity and safety concerns identified by National Highways at M2 Junction 1. The consultation document recognises that this Junction falls outside of Medway and it is encouraging to hear that Medway Council is working with neighbouring authorities and wider stakeholders to prioritise action on delivering a solution for improvement works to this junction. The NPPF (para. 24) places a duty to co-operate on such strategic transport issues which cross boundaries and therefore Medway Council should ensure that it works together with Gravesham Borough Council and National Highways to identify a junction improvement scheme to ensure that issues with junction capacity do not constrain growth.
- 3.9 Presently, the Outline Planning Permission for MedwayOne is restricted on the initial number of peak hour traffic movements that can be generated from the Site due to the potential theoretic highway impact upon Junction 1 of the M2 expressed by National Highways. The theoretical impact relates to the level of committed development which may affect capacity at this junction. The initial trip cap may be exceeded where analysis demonstrating acceptable effects at Junction 1 of the M2 is agreed with National Highways or a scheme for enhancements to Junction 1 of the M2 and a programme of delivery is agreed with National Highways. We understand that Medway Council will be preparing a Strategic Transport Model and Assessment to support the new Local Plan and part of this work will include developing an outline design for Junction 1 of the M2.
- 3.10 It is clear that a solution needs to be identified to address capacity concerns at Junction 1 of the M2 in the short-term in order to ensure that growth is not constrained both for current developments with planning permission (including MedwayOne) and future growth across the Plan period. National Highways has indicated that strategic solution is required through the Local Plan process.
- 3.11 In order to realise Medway's development growth over the Plan period, significant investment in transport infrastructure will have to be made. Furthermore, with the recent Government announcement that HIF funding will no longer contribute towards the key strategic infrastructure programmes that were planned to support growth on the Hoo Peninsula, it will be even more important that the Council ensures that a robust plan to facilitate the growth envisaged over the Local Plan period is identified.

iv) Employment Sites

- 3.12 We welcome the identification of the (2003 Local Plan) extant strategic employment sites at Grain and Kingsnorth on the Hoo Peninsula as set out within para. 5.57. The Employment Sites map 5 provides an overview of potential employment site allocations which have been identified within the Land Availability Assessment (September 2023).
- 3.13 The map shows several potential employment sites to the northwest of the MedwayOne site, located on greenfield land. The NPPF notes that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land as set out within the NPPF. Furthermore, LPAs are required to give 'substantial weight' to the value of utilising valuable brownfield land and "support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land". (Paras 119 – 120)
- 3.14 The comprehensive redevelopment of the former Kingsnorth Power Station and future proposals for Grain Power Station are prime examples of the regeneration of brownfield sites, fully aligned with the approach set out within the NPPF (para. 120(c)) to prioritise development on brownfield land. As part of the decommissioning of the former Kingsnorth Power Station, Uniper has made significant investment into remediating contaminated land to support future development.
- 3.15 Whilst we are supportive of the Council identifying sufficient sites in order to meet the District's future employment needs over the Plan period, it is important to accord with the NPPF insofar as any extant 2003 brownfield allocations are fully utilised before the release of any new greenfield allocations. It is important that future potential allocations on the Hoo Peninsula do not undermine the success of sites which already have planning permission including MedwayOne. Furthermore, the Local Plan should consider how employment land can be appropriately phased to ensure that development on brownfield land can be prioritised. This is particularly important for the following reasons:
- the greenfield land that has been identified for potential employment uses as part of the Land Availability Assessment is relatively unconstrained and requires less financial investment to develop than MedwayOne, which is remediating and regenerating contaminated brownfield land;
 - MedwayOne is located on an existing allocated employment site within the adopted Local Plan. The principle of employment development in this location is therefore already well established and the recent grant of Outline Planning Permission reaffirms this;
 - Without the phasing of future employment land on greenfield sites this would undermine the progress of development at MedwayOne because employment development of (cheaper) greenfield land over brownfield sites could be more commercially attractive for potential occupiers.

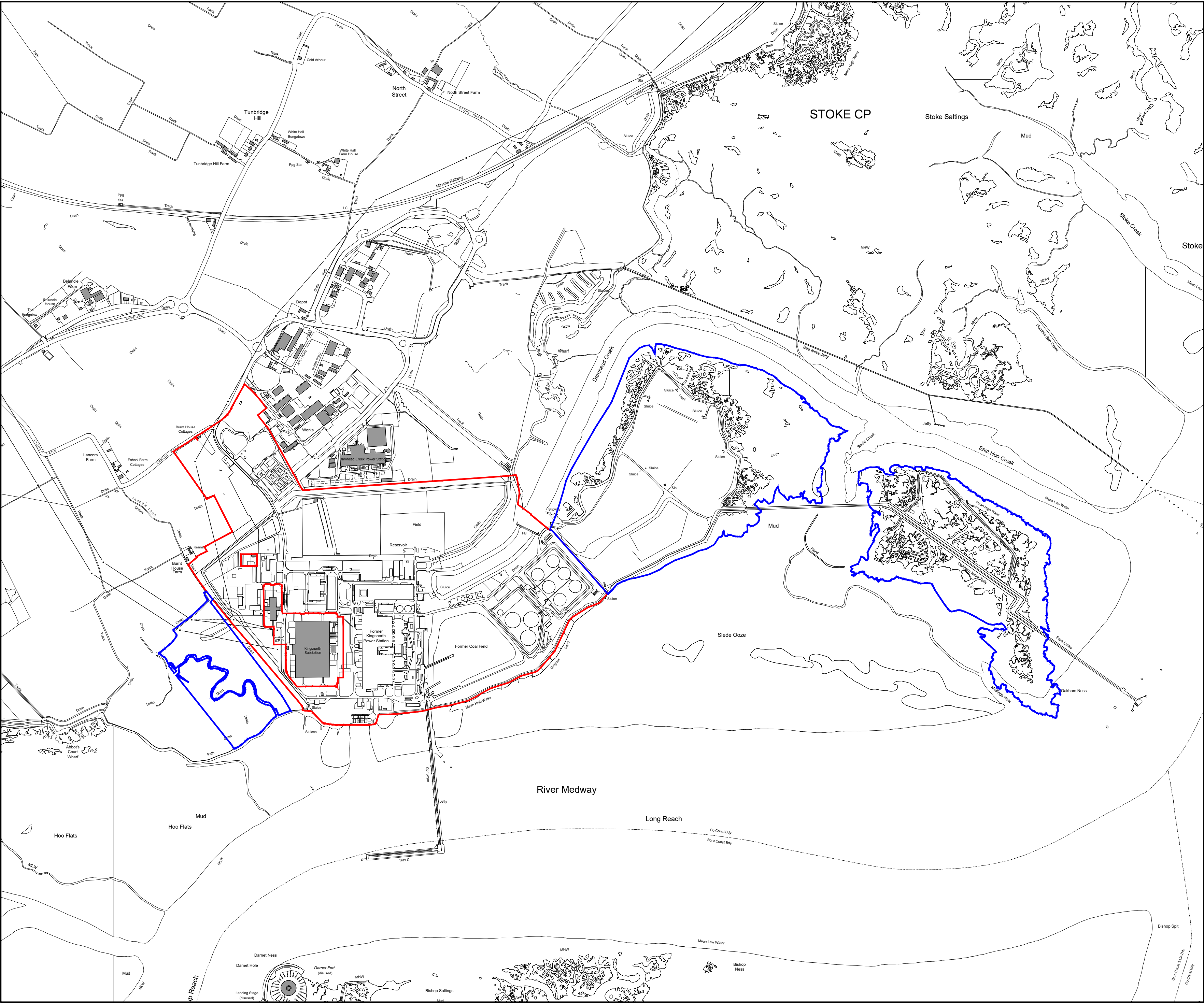
- 3.16 The same general principles relate to Grain Power Station in terms of prioritising redevelopment of a brownfield site over greenfield land.
- 3.17 The consultation document notes that “*the plan is to consider the need for more employment floorspace for businesses.*” (para.5.56) and that “*the Medway Employment Land Assessment, 2020 indicated a need for c 62.3 hectares of employment land up to 2037.*”
- 3.18 We **support** that a comprehensive review of employment land needs will be undertaken to forecast the employment land requirements over the entirety of the Plan period up to 2040. This will ensure that sufficient sites can come forward and at a sufficient rate to address objectively assessed needs over the Plan period in line with para. 23 of the NPPF.
- 3.19 The Employment Land Needs Assessment (ELNA) (October 2020) recognises that Medway lies within an area of significant interest for logistics operators. However, Medway has experienced much lower levels of growth within the distribution sector as traditionally locations within Thurrock, Dartford and Swale have attracted occupiers due to a large supply of land and port accessibility. Although the report recognises that there has been an expansion in the sector, including recent development at the London Medway Commercial Park on the Hoo Peninsula. The re-development of the former Kingsnorth Power Station site and future development proposals at Grain Power Station will make a significant contribution to meeting Medway’s employment needs over the Plan period.
- 3.20 The ELNA has assessed various different scenarios for future employment need including impact upon the supply chain from delivery of London Resort at Swanscombe Peninsula. However, since the report was produced, the planning application for London Resort has been withdrawn and there is uncertainty as to the project’s delivery, particularly within the short-term and the early part of the Plan period. It is considered that the ELNA evidence base should be refreshed to take this into account and to ensure that it is robust given that it has been 3 years since the report has been produced and the impact of the Covid-19 pandemic on employment growth is now known.

4.0 CONCLUSIONS

- 4.1 The Regulation 18 Local Plan (September 2023) has been produced by Medway Council seeking to address its growth needs until 2040.
- 4.2 We support the overall vision for sustainable economic growth to meet Medway's employment needs as set out within the consultation document but it is clear that this strategy will need to be supported by relevant updates to the previous economic evidence base and the ELNA to ensure that it accurately reflects Medway's employment land needs over the entirety of the Plan period.
- 4.3 We consider that it is important to ensure that future employment allocations are appropriately phased to ensure that there is a clear strategy that gives substantial weight to the best possible use of brownfield land and prioritises the use of brownfield over greenfield land to meet identified employment needs.
- 4.4 The key strategic infrastructure needs have been identified and Medway Council should work closely with key stakeholders including Gravesham Borough Council and National Highways to identify an appropriate improvement scheme to address capacity issues at Junction 1 of the M2 in order to ensure that future development on the Hoo Peninsula including MedwayOne and development at the Grain Power Station is not unduly constrained.
- 4.5 Both sites at the former Kingsnorth Power Station and Grain Power Station will play a key role in realising Medway's vision for economic growth, inward investment and employment generation and the policy framework for these sites within the next iteration of the emerging Local Plan should ensure that there is sufficient flexibility to support future development.

APPENDIX 1

FORMER KINGSNORTH POWER STATION SITE LOCATION PLAN



The scaling of this drawing cannot be assured

| Revision | Date | Drn | Ckd |
|-----------------------|----------|-----|-----|
| C | 15.01.21 | SM | EH |
| Site Boundary Updated | | | |

- Site Boundary
111.00Ha / 274.29Ac
- Land Under Ownership
115.89Ha / 286.37Ac

Project
MedwayOne

Drawing Title
SITE BOUNDARY PLAN

| | | | |
|------------|------------|----------|----------|
| Date | Scale | Drawn by | Check by |
| 15.07.20 | 1:10000@A2 | S.M. | E.H |
| Project No | Drawing No | Revision | |
| 29497 | RG-M-20 | C | |



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APPENDIX 2

GRAIN POWER STATION SITE LOCATION PLAN

