

31 October 2023

Dear Sir/Madam,

Trenport Investments Limited (TIL) prepared these representations to Medway Council's ('the Council') Regulation 18 Local Plan consultation in relation to Land to the east and west of Church Street, Cliffe, Rochester ('the site'). TIL welcomes the first step by the Council in advancing a new Local Plan and for the opportunity to make comment on its contents.

TIL has supported the Council's plan-making process for over 20 years and remain of the view that a flexible, adaptable and dynamic Local Plan will assist the planning of the council in the future.

Background

TIL is a privately owned investment and development company with an active portfolio of property and development projects throughout the country. TIL own a large portfolio of land in Kent, including Medway, which includes land lying to the south, east and west of the village of Cliffe. TIL act as both a "master developer" securing planning permission, implementing all necessary strategic infrastructure and disposing of serviced land to housebuilders. TIL also has its own housebuilding subsidiary, Rosechurch Homes, such that it can directly deliver high quality new homes.

Current Development Proposals

TIL submitted an outline planning application in January 2022 (LPA Ref: MC/22/0254) at the Site for the following:

"Outline application with all matters reserved except for (access) for a residential development of up to 250 dwellings and a mixed-use community hub together with associated infrastructure including public open space and community facilities comprising a replacement sports ground and pavilion, with accesses from Church Street, Cooling Road and Buttway Lane."

We have enclosed the illustrative masterplan submitted with the application. The development proposals will deliver the following:

- Up to 250 new homes including 25% affordable housing.
- High quality design seeking to retain the existing character of the village.
- New accesses to the residential parcels.
- Highway improvements including an enhanced parking scheme along Cooling Road, Station Road and Church Street for existing residents
- Creation and enhancement of cycleway and footpath linkages throughout the development and beyond.
- Approximately 4.8ha of amenity green space and sports/recreation provision, exceeding the Council's standards.
- Creation of approximately 9.22ha of semi natural open space for recreation purposes.
- Total provision of all open space amounts to just over 14ha, which represents approximately 60% of the total site area.
- Provision of a community hub that will rejuvenate the local area.
- Replacement sports ground and pavilion as part of a package to relocate and enhance the existing sport facilities.
- Biodiversity net gain of greater than 20%.
- Improvements to local bus service.
- Provision of electrical charging points to all new properties, with some spaces available for the existing community.

- Provision of broadband access to enable easy access to local home delivery services and home working.
- Comprehensive Section 106 Agreement of financial contributions providing more than £2.5Million towards improvements to local services and facilities.

In terms of policy designations, the site is:

- Not subject to any national or local environmental designation.
- Not a designated habitat site or SSSI.
- Not Green Belt (or subject to any similar allocation).
- Not within an Area of Outstanding Natural Beauty, a “local green space” or identified as a “valued landscape”.
- Not a designated heritage assets or those of archaeological importance.
- Not in area at risk of flooding or increasing the risk of flooding elsewhere.

The Council’s planning officers recommended the application for approval, however, the council’s planning committee subsequently refused the application in October 2022 contrary to that advice and put forward four reasons for refusal.

TIL appealed the decision and Public Inquiry was held in May 2023. At the Inquiry, the Council withdrew their reasons for refusal stating in their Updated Statement of Case dated 22 May 2023 that:

“having carefully considered its position following the evidence heard in the first week of the inquiry. For the reasons which follow, the Council has decided that it is necessary to withdraw its reasons for refusal forthwith”.

The appeal is pending a decision.

Previous Representations

Representations were previously submitted on behalf of Blue Circle, as part of the preparation of the Medway Local Plan (2003) seeking the extension of the boundary of Cliffe to allow for the development of around 300 dwellings. The Local Plan Inspector did not agree at that time that the boundary should be altered but did comment that further development, as part of a planned village expansion, might help to sustain village services and could increase public transport in the longer run. The Inspector indicated that the possibility of allocating land around Cliffe could be considered in the next review of the local plan.

The adopted Local Plan identifies all the land as outside of the village boundary where Policy BNE25: Development in The Countryside seeks to limit development, excluding sites allocated for development, brownfield land and development which demands a countryside setting.

TIL have promoted the Site submitting representations to previous consultations including:

- Core Strategy and Housing and Mixed-Use Development Plan Document (2006)
- Medway Call for Sites (2008)
- Medway Call for Sites (2014)
- Regulation 18 Issues and Options Consultation (2016)
- Regulation 18 Development Options Consultation (2017)
- Regulation 18 Development Strategy Document (2018)
- Future Hoo – New Routes to Good Growth - Housing Infrastructure Fund Consultation (2021)
- Hoo Development Framework Consultation Draft (2022)

Comments on Regulation 18 Local Plan Consultation

The Regulation 18 Local Plan document sets out the framework for the area's growth up to 2040 and where and how new development can take place. Section 1.4 notes that this consultation does not detail policies or identify those sites preferred by the Council for new development and that detail will come in the next stage of work on the Local Plan. It is also notes in Section 5.1 that the Local Plan will include a Policies Map which will show land allocated for new housing development. Notwithstanding the above, Map 3 on Page 22 of the Regulation 18 Local Plan provides an overview of potential sites for rural development. The Site is not included within Map 3.

Section 5.12 sets out that the housing needs for the Council over the plan period is 28,339 and figure 2 splits the potential sources for the supply into three categories - pipeline, windfall and allocations. Section 5.13 notes that there is an existing pipeline of sites for over 7,500 homes, the Site is likely not included as a pipeline site as it does not yet have planning permission. Therefore, unless the Site has been included as a windfall, the Site should be considered as an allocation.

Section 5.14 and 5.15 notes that the Council has produced a Land Availability Assessment (LAA) to review potential sources for allocation. The LAA identifies land with potential capacity for circa 38,200 homes of which many of these sites are subject to constraints including environmental considerations. Section 5.16 goes on to note that the LAA has identified four broad categories of locations where development could take place – Urban regeneration, suburban growth, rural development, green belt loss. In this context, the Site would be considered a rural development site. However, the Site is not included in Map 3 as a potential site for rural development and is therefore likely to have been excluded from the 14,736 homes in the rural development category of the 38,200 potential housing capacity set out in Table 1. As such, it is not clear if the Site is being considered as an allocation or any other category within the Regulation 18 Local Plan.

In addition, Section 5.39 of the document notes that most of the sites currently being promoted for housing led development are large scale with the potential to provide land for hundreds of homes. On this basis, the Site should be considered as it could provide up to 250 homes along with a number of benefits outlined above and is not the subject of any environmental constraints.

TIL seeks clarity on the status of the Site within the consultation document and emerging local plan. We would strongly recommend that the Site, which has been the subject of the scrutiny of a Public Inquiry where the Council withdrew their objections, is included on Map 3 in the next version of the Local Plan and any future iteration of the policies map in the Local Plan.

Summary

We trust that the enclosed is in order but if you do have any questions, please contact me on [REDACTED]

Yours sincerely,

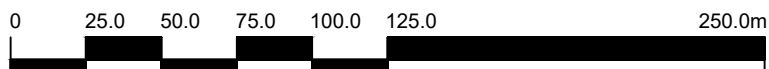
Owen Weaver
Planning Manager – Trenport Investments Limited

The copyright of this drawing is vested with Corstorphine & Wright Ltd and must not be copied or reproduced without the consent of the company.

Figured dimensions only to be taken from this drawing. DO NOT SCALE.
All contractors must visit the site and be responsible for checking all setting out dimensions and notifying the architect of any discrepancies prior to any manufacture or construction work.



NOTES:



KEY

Planning Application Boundary

Note:



Rev	Date	Drw	Chk	Notes
-----	------	-----	-----	-------

INFORMATION

Client	TRENPORT INVESTMENTS LTD
Project	LAND AT CLIFFE

Drawing Title	ILLUSTRATIVE MASTERPLAN
---------------	-------------------------

Drawn	Checked	Paper	Scale	Date
RL	JT	A1	1:2500@A1	APR 2023
Project No.	Drawing No.	Revision		
21122	0319	01		

Corstorphine & Wright

Warwick
London
Birmingham
Manchester
Leeds
Canterbury
Glasgow
Dublin

21_27 Lamb's Conduit Street, Holborn, London, WC1N 3NL
Tel: 020 7842 0820 www.corstorphine-wright.com