

LOWER RAINHAM REF: MC/19/1566

Response to consultation comments

10/10/2019

This planning note is provided in response to the consultation comments received in regards to the planning application at Pump Farm Lower Rainham (Planning Ref: MC/19/1566). This note specifically responds to the comments dated 15/07/2019 issued by the Planning Policy officer.

PRINCIPLE AND POLICY APPROACH

Firstly, we note that the Authority acknowledge that due to the lack of five year housing land supply the fact that the site is designated countryside is not a reason to refuse planning permission. In fact, the applicable planning policy test is that of sustainability as defined within the NPPF. Therefore, the officer has sought to address these three strands within their response. This is discussed in more detail below however, as agreed above the authority do not have a five year housing land supply and the emerging plan has previously suggested significant development on the Hoo peninsula. On this basis, it has been acknowledged at the Local Plan viability assessment workshop that they will not, at present, be modelling for strategic development in this location because, without the HIF it has been accepted that development may not be viable. Considering this uncertainty in the proposed allocations, there is currently a need for strategic sites to be promoted to start delivering housing within first five years of the local plan. As such, the planning application at pump farm would assist the local authority in meeting its five year housing land supply target.

Notwithstanding the above, and turning to the contents of the planning officer's response, I have taken these in order and respond below.

ECONOMIC

We note that the officer agreed that there will be substantial short-term economic benefits with regards to construction phases. However, the officer outlines, that people will need to travel long distances to employment sites located within the district and therefore, the proposals are unsustainable. While some employment sites are located some distance from the application site at pump farm, this is no different to the other housing allocations located at the Hoo Peninsula, where all would have to travel for work.

In any event, as illustrated within the submitted Transport Assessment, the proposals will provide facilities within the scheme to limit the need for people to travel long distances. Likewise, the proposals are located within close proximity to the Rainham Station which provides sustainable travel to wider economic sites within Chatham, Gillingham and London.

As such, it is considered that the proposals at pump farm will provide much needed housing in an area which is well located, compared with proposed allocations, to existing facilities and sustainable modes of travel.

ENVIRONMENTAL

The officer has noted that policy recommends resisting further built development and introducing more positive landscape management at pump farm. While this is noted, strategic development is required to meet the councils five year housing land supply and when considering the areas previously allocated for development, Hoo peninsular, the proposals at pump farm will have less impact on the landscape. Built development to this scale is evidently going to impact on the landscape however, in this location, the

proposed development would not fundamentally alter the character of the wider landscape outside the boundaries of the site.

The proposed development as illustrated by the masterplan delivers a scheme that is in scale and character with the local landscape and is well related to the nearby settlement. A robust and extensive landscape strategy for the site has been submitted which includes the provision of new Green Infrastructure including woodland buffer planting and new community orchards to provide a land use reference to the site's former use. Therefore, it is considered that the development, considering its strategic nature, respects the surrounding landscape character. Further to this, please see submitted accompanying Heritage Report produced by KM Heritage and email from Julian Boyer regarding Historic Landscape.

In regards to agricultural land, the officer accepts that the current quality of agricultural land has declined and therefore, is not sufficient for existing activities. However, the officer notes that another landowner or producer may be able to make the site economically viable due to different farming methods. This assertion is not backed up by any technical evidence whereas, the submitted documentation considers alternative uses and concludes that the site to have minimal agricultural value and therefore, would not be appropriate for alternative producers.

SOCIAL

It is noted that there is a lack of comment in regards to social sustainability and therefore, and considering the benefits in regards to additional services and housing growth, of which some will be affordable, it understood that this is supported by the planning officer.

SELF BUILD

In regards to self build plots, if there is a demand for more to be included within the scheme the applicant is content to have these included.

CONCLUSION

In summary, the above illustrates that the proposals represent sustainable development and therefore, in accordance with the NPPF, should be approved without delay. No significant adverse impacts would arise from the development which would conclude that planning permission should be refused. Rather, the development would provide for many and various important benefits that separately and together should attract very significant weight.