

**TOWN AND COUNTRY PLANNING ACT 1990**  
**APPEAL REFERENCE: APP/A2280/W/20/3259868**

**Medway Council**  
**Addendum note on Building Heights Parameters Plan**

**Land off Pump Lane  
Rainham  
Kent  
ME8 7TJ**

**MARCH 2021**

## **Introduction**

1. The Council made written comments in response to the Appellant's document entitled "INQUIRY DOCUMENT: Parameter plans – Building Heights (26/02/2021)" together with its attachment, on 3<sup>rd</sup> March 2021.
2. After the Council's comments were sent to the Inspector, the Appellant then submitted a revised version of their document, now entitled "Pump Parameter note 03.03.2021." Appended to this note was a further revision to the Building Heights Parameter Plan:
  - Previously submitted on 26<sup>th</sup> February: dwg. no. PL-011-A
  - Submitted on 3<sup>rd</sup> March: dwg. no. PL-011-B.
3. This matter was discussed during inquiry time on Friday 5<sup>th</sup> March, and as a result this addendum is to the Council's note of 3<sup>rd</sup> March and responds to the submission of the latest revised Building Heights Parameter Plan.

## **The Council's Position**

4. The Council's position has not changed from that expressed in its 3<sup>rd</sup> March note, in response to the further submission of dwg. no. PL-011-B. As such, the Council does not, in principle, object to the proposed amendments to the Building Heights Parameters Plan. Now, as then, this position is subject to the Council being permitted to submit short addendum notes from Mr Jon Etchells (Landscape witness) and Ms Kit Wedd (Heritage witness) to address the extent to which, if at all, the proposed amendment affects the assessments they have reached in their evidence.
5. Mr Etchells and Ms Wedd have both produced short addendum notes updating their evidence – and their notes appended to the Council's note of 3<sup>rd</sup> March – specifically (and only) to take account of the proposed revised Building Heights Parameter Plan (PL 011 Rev B).
6. The two addendum notes are attached at Appendix A and Appendix B to this note. It will be seen that in both cases the witnesses confirm that the proposed revised amendment would not materially affect the conclusions that they had reached in their evidence and give reasons for this being the case.

**8th March 2021**

Appendix A - Building Heights Parameter Plan addendum response from Jon Etchells

## LAND AT PUMP LANE, RAINHAM

### ADDENDUM TO PREVIOUS NOTE ON PROPOSED SUBSTITUTION OF BUILDING HEIGHTS PARAMETER PLAN

1. I produced a note dated 2 March 2021 on the Appellant's proposal to substitute a new Building Heights Parameter Plan for that which formed part of the Supplementary Environmental Statement submitted with the Appeal (drawing PL 004 B). That note was based on the Appellant's drawing PL 011 A, and I commented in my previous note on the differences between that and the original Building Heights Parameter Plan - my view in summary was that the substitution of the drawing would not make a material difference to my assessment, for the reasons set out in my note.
2. Since then, I understand that the Appellant has submitted (on 3 March) a further revision to the Building Heights Parameter Plan (drawing PL 011 B), and intends to rely on that drawing. The difference between the PL 011 A and PL 011 B drawings is that Revision B shows the 10m height limit (coloured in blue on the drawing) for the area of the care home just to the north east of Pump Farm, whereas Revision A showed that area with a 12m height limit (coloured orange).
3. This Addendum to my previous note therefore considers whether this further change would make a material difference to my assessment, and my view is that it does not, for the following reasons:
  - a) The care home area makes up a relatively small part of the overall proposals, so a height difference of 2m within this area would not be a significant change in overall terms.
  - b) A maximum height of 12m would still be possible in the areas adjoining the care home zone to the north, west and south west.
  - c) As set out in my previous note, three storey buildings can appear quite different to two storey buildings, as they tend to have a more urban appearance, but the actual difference in maximum height is only 2m, and buildings of either 10 or 12m in height would be significantly taller than the hedges alongside Pump Lane (noting that some of those hedges would be removed to facilitate the new junction on Pump Lane close to the care home zone).
  - d) Also as set out in my previous note, the categories of effect in the assessments (both mine and that of Tyler Grange/ Mr Hughes) are quite broad, so the very minor reduction in effects which a reduced number of slightly taller buildings in the area of the care home

might produce would not be enough to lead to a change in category of overall effect, e.g. a reduction from moderate to high adverse effects down to moderate adverse - the main change would be in the development of the site, not in the slight reduction in height of some of the proposed buildings.

Jon Etchells Consulting, 5 March 2021



Appendix B – Building Heights Parameter Plan addendum response from Kitt Wedd

## Pump Lane Appeal Revised Heights Parameter Plan PL-011-B

### Addendum to previous note (dated 3 March 2021) on revised Heights Parameter Plan PL-011-A

1. I produced a note (dated 3 March 2021) on whether the Appellant's proposed substitution of a new Building Heights Parameter Plan (dwg. no. PL-011-A) in place of the plans previously submitted (dwgs. nos. PL-004-A and PL-004-B) would cause me to revise my assessment of the impact of the proposed development on the significance of the heritage assets that would be affected by change to their setting.
2. In that note I concluded that the proposed reduction in the maximum height of the housing in the southern part of the site, from 12m to 10m, would not cause me to revise my assessment that the proposed development would cause less than substantial harm (in the low to middle part of that range), to the significance of the heritage assets affected by change to their setting.
3. The Appellant has subsequently submitted a further revision to the Building Heights Parameter Plan (dwg. no. PL-011-B). This shows the area where the maximum building height of 10m would apply further extended to include the proposed care home north-east of Pump Farm. The layout of buildings and roads in the proposed development is unchanged.
4. In this addendum to my previous note I consider whether this further change would cause me to change my assessment of the impact on heritage significance of the proposed development. I have concluded that it would not, for the following reasons:

a) The reduced maximum height applies to only part of the Site; no change is proposed in the vicinity of the following designated assets:

- Bloors Place (listed Grade II\*)
- The outbuildings and garden wall at Bloors Place (Grade II)
- Pump Farmhouse (Grade II)
- Bloors Oasts (non-designated heritage asset)

Therefore, my assessment of harm to these assets, considered individually, is unchanged.

b) No further change is proposed in the vicinity of York Farmhouse (listed Grade II) or the Lower Twydall Conservation Area. Therefore my assessment of harm to these assets, considered individually, is unchanged.

c) The further reduction in maximum height might make the built form less evident in some views of Chapel House (Grade II) and the western part of the Lower Rainham Conservation Area but it would not overcome the objection to the loss of the undeveloped open farmland setting of the designated heritage assets. The loss of the ability to appreciate the historic association with and dependence on the surrounding land for both the listed building and the conservation area would still occur, whether or not the area of 10m maximum height were to be further extended.

d) The impact of the proposed development on the historic landscape of the Site as the shared setting of a constellation of heritage assets would not change as a result of the further extension of the 10m maximum height area. The development would still result in building across large swathes of land which form the agricultural and rural setting to both the conservation areas and the listed buildings within them. The following changes would still occur:

- Loss of the historic character of the landscape as undeveloped open farmland
- Loss of the north-south sequence of historic landscape types
- Coalescence between the conservation areas, listed buildings and Bloors Oasts, and consequent loss of the historic pattern of sparse and scattered development, and ability to understand the historic relationships between places
- Loss of views of the historic landscape and heritage assets from Lower Rainham Road, Pump Lane and the Bridleway
- Provision of new roads and associated infrastructure, with consequent impact on the character of Pump Lane as a rural lane, the Bridleway and part of the Lower Rainham Road within the setting of Chapel House
- Introduction of lighting, noise and urban activity; loss of diurnal and seasonal cycles of agricultural activity, natural light and tranquillity.

The proposed extension of the area of 10m maximum height would not change the harmful impact of these changes.

Kit Wedd

7 March 2021