



## Cliffe and Cliffe Woods Residents Development Group

Dear Mr John Legg,

**REF: APP/A2280/W/22/3313673**

**MC/22/0254 - 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.**

The Cliffe and Cliffe Woods Residents Development Group (C&CWRDG) is an unincorporated residents' association who successfully applied for registration of the APCM site, Cliffe, including the Bowls Club to be added to the Medway Council Assets of Community Value (ACV) Register. This site was registered on 24 May 2022 and listed as it was recognised by officers of Medway Council that the site meets all the requirements for such status as required by the Localism Act. The APCM site (ACV) forms part of the proposed development. Whilst an alternative offering is proposed, the community have fiercely objected to the new location on a number of grounds.

The Cliffe and Cliffe Woods Residents Development Group formed initially as a Facebook Group in 2020. It now has 705 members. The Group officially formed as an Unincorporated Community Association in April 2022. Attendance at meetings averages 100 members of the Cliffe community.

The APCM is the key that unlocks this 250-home development. For the development to go ahead, one of the most vital community facilities in the small village of Cliffe must be relocated. The APCM facilities were assigned Asset of Community Value due to their cherished location and clear sightlines, which allows users of all ages to feel safe at all times of day. The proposed new site will be a significant downgrade in terms of safety, as there will be no lines of vision. The existing playing fields, that will be adjoining the replacement facilities, are already the site of Anti-Social Behaviour. In a village with few community facilities, ripping the heart out of the village by relocating this valued asset will have a significant impact on those that rely on this space for health and well-being. The C&CWRDG provided extensive evidence as part of our Objection relating to this concern – including photographs, press reports, crime figures and public statements.

**The Cliffe and Cliffe Woods Residents Development Group members are writing to you to request respectfully that they are granted Rule 6 Status in the above referenced appeal.**

The focus of our community driven group, in line with our constitution, is the *health, well-being, social values and the environmental impact* of developments and change of use of facilities and land types within ours and the neighbouring village.

The Cliffe and Cliffe Woods Residents Development Group have identified a number of key concerns relating to appeal APP/A2280/W/22/3313673 that would have a detrimental impact on the health, wellbeing, social values and environment of our community.

Aligned to the four reasons for refusal of this application by Medway Council, our key areas of challenge are tabled below.



## Cliffe and Cliffe Woods Residents Development Group

Application Refusal Grounds				Cliffe and Cliffe Woods Residents Development Group, Grounds for Objection and concern
1	2	3	4	
X	X	X	X	<u>Environmental Impact</u> <ul style="list-style-type: none"> <li>On 22<sup>nd</sup> June, the appellant submitted their Environmental Statement.</li> <li>Since this date at least 10 other documents, all which would be viewed to have an Environmental Impact have been submitted by the appellant, yet the Environmental statement has not been updated to factor this key information and reporting.</li> <li>For this reason the C&amp;CWRD have constantly challenged the validity of the reporting by the appellant used to produce the EIA and Environmental statement.</li> <li>Change of use of current arable land to accommodate relocated APCM facilities has a significant impact on the environmental, ecological and social aspects laid out in the scope of EIA.</li> </ul>
X	X	X	X	<u>Scale of Development</u> <ul style="list-style-type: none"> <li>Cliffe is a small and relatively remote village that currently holds approximately 1100 residential properties that exist with minimal infrastructure and facilities.</li> <li>This development of 250 homes is the equivalent of 23% of the existing residential footprint. This is a huge level of overdevelopment and will have a significant impact on the village, the surrounding villages and its residents.</li> </ul>
X	X	X	X	<u>Community Consultation and Engagement</u> <ul style="list-style-type: none"> <li>Medway Planning Officers recommended that the Appellant commission an independent facilitator - Design South East - to carry out some engagement workshops with the local community <i>to understand their hopes and fears for the development at Cliffe.</i></li> <li>Design South East claim that they put forward a proposal for a series of workshops to hear from local people and offer an opportunity for local residents and businesses to input into proposals for development.</li> <li>Members of the Cliffe and Cliffe Woods Residents Development Group have extensively challenged the invitation approach of these sessions and the lack of action taken by the facilitators to ensure that representatives from the community were in attendance.</li> <li>Less than two weeks' notice was given to attendees during a pandemic. This was not acceptable and was arranged with a high risk of failure to attend.</li> <li>Over two thirds of those on the contact list were NOT sent any form of invitation.</li> <li>We found that a very high number of invitees were contacted via a 'group approach' such as a website – or that no contact details were listed at all and in reality, no invitation was issued.</li> <li>This means that there was no real hope for success in terms of community attendance numbers – as such nobody beyond the PC attended.</li> <li>From September 2021 – October 2022, our Community Group and other residents challenged the approach and clearly demonstrated a desire to be consulted.</li> <li>The Appellant took no action to mitigate these concerns and falsely claimed that they has engaged with the community. This is essentially an application with very little input from the community and no genuine desire from the appellant to provide dwellings and facilities in keeping with the community's needs.</li> <li>Lack of consultation on essential services and residents needs, has led to a heavily car dependant application as there is no viable alternative modes of transport to meet residents needs.</li> </ul>
X	X		X	<u>Access to Health and Care</u> <ul style="list-style-type: none"> <li>The Health Impact Assessment provided by the appellant is factually inaccurate and does not consider the impact of increasing our village by 23%.</li> </ul>



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				<ul style="list-style-type: none"> <li>The Cliffe practice has 13 GPs – There are 15,623 patients registered at the practice – 1,201 patients per GP. This does not include additional patients linked to approved or in construction planning applications, circa 300+ new dwellings.</li> <li>The HIA does not consider that ALL of these GPs are part time. This potentially means that the Practice only has the equivalent of 6.5 FULL TIME GPs – therefore this means that each full-time equivalent GP has 2,400 patients – UK average is 2,098 patients per GP.</li> <li>The HIA fails to consider that Cliffe Surgery <b>CLOSED</b> for face-to-face patient appointments in March 2020 and remains a pharmacy, nurse and administrative base only.</li> <li>The closest surgery to the village for face-to-face appointments is Cliffe Woods. THERE IS NO SAFE PEDESTRIAN ROUTE from Cliffe to Cliffe Woods.</li> <li>Acute – the closest hospital is Medway Maritime Hospital which is located 5.3 miles from the village. The only way to get to this site is via ambulance, car or, during operational hours, a bus that runs once an hour.</li> <li>Dentists – the closest Dentist is over 3 miles away. As above, a vehicle is required.</li> </ul>
X		X	X	<p><u>APCM – Asset of Community Value</u></p> <ul style="list-style-type: none"> <li><b>The APCM relocation is the key that unlocks this application.</b> For the development to go ahead, one of the most vital community facilities in the small village of Cliffe would need to be relocated. This site is heavily used by residents for their health and wellbeing.</li> <li>The Application proposal and associated documents do not contain any design that would enable a planning officer or Sports England to conclude that the facilities would be improved, nor are there any associated costs committed to by the appellant at this stage. Without a budget or design, and with no consultation with the community or the holders of the ACV with regards to the 'Newly proposed APCM', it is impossible to gauge the full impact of this proposal on the community.</li> <li>At the time of the Planning Committee application refusal, Sports England had not provided a final statutory response. The only response from Sports England on the planning portal, uploaded 13<sup>th</sup> September 2022, states that they will respond within 14 days.</li> <li>The proposed site of the new APCM is hidden by housing. It goes against all of the reasons why the Application for Asset of Community Value was made and will create a space with no lines of vision for the wider community, a closed off environment unlikely to feel safe for lone walkers, runners etc. and a space 'hidden' that is likely to facilitate Anti-Social Behaviour.</li> <li>The proposed location is directly beneath 33,000V overhead cables, which would be a major hazard for many sports and recreational activities, such a kite flying etc. To relocate these overhead cables would have a prolonged and extensive impact on the residents of the village.</li> <li>The lack of engagement with the community has meant that there is no genuine desire from the appellant to provide equivalent or improved facilities as they have not determined what the community wants and needs.</li> </ul>
X	X		X	<p><u>Community Amenities</u></p> <ul style="list-style-type: none"> <li>The appellants report a number of existing amenities that are available to the community. The level of accuracy has astonished residents. Listed as current amenities are the Black Bull Pub (closed for 20 years) and the Evening Star Pub (closed for 7 years).</li> <li>The village currently have one small corner shop, one small lean-to newsagent (open for limited hours each morning), one primary school &amp; one GP surgery that is closed apart from for nurse appointments and dispensing prescriptions.</li> <li>Even with the proposed new community hub, all residents and those who move into the proposed 250 homes, will be reliant on cars or the limited bus services to meet their basic needs.</li> </ul>
X	X		X	<p><u>B2000 – safe routes of passage</u></p> <ul style="list-style-type: none"> <li>The B2000 currently has no provision for pedestrians and cyclist with regards to access to Cliffe Woods and beyond.</li> <li>The proposed road modifications by the appellant do not improve this access beyond the village either.</li> </ul>



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				<ul style="list-style-type: none"> <li>Many are unable due to mobility to walk across the fields to Cliffe Woods for the GP and shops. Large numbers of new residents would be reliant on travelling by vehicle on the B2000.</li> </ul>
X		X	X	<p><u>Junctions and Crossing Points – Danger to life</u></p> <ul style="list-style-type: none"> <li>The proposed layout of junctions, crossing and parking on Church Street are dangerous. The proposed access to both the Eastern and Western parcels of the development are accessed from Church Street, where current traffic calming measures are to be removed.</li> <li>In their place we will have two junctions, a pedestrian crossing, parked cars as well as the existing bowls club access junction and mini-roundabout at Millcroft Road. All of these elements are within approximately 150m of each other resulting in a cacophony of driving and pedestrian hazards.</li> <li>The visibility splays between pedestrians and drivers are also below the minimum required. It should also be noted that the added on-street parking will obscure drivers from being able to see pedestrians waiting to use the zebra crossing. This adds further to the concentration of hazards.</li> <li>This is a heavily used stretch of road that runs through the centre of the village. Many children walk this route to school and villagers to access the shop and bus stop adjacent to the church.</li> <li>Relocating the APCM to the rear of the village, will mean that accessibility from a large number of locations in the village will be hindered as parts of the route have no footpath or safe right of passage.</li> </ul>
X		X		<p><u>Loss of arable land – Grade 1</u></p> <ul style="list-style-type: none"> <li>The housing sites and relocated sports facilities will result in the loss of high grade arable land. MagicMaps and Medway councils own Strategic Land Availability Assessment shows the development sites as being Grade 1 or Grade 2 arable land. The Appellants' Land classification assessment for the proposed sites show an overall classification of 2-3a (Still best and most versatile land (BMV), which should be protected).</li> <li>We find that these reports do not follow the government guidance on land classifications, with irrigation measures not considered. There is clear evidence that irrigation is used frequently and widely on land assessed in the appellant's report. The inclusion of irrigation in the land assessment results in an up-grading of classification, i.e. to grades 1-2 (as per MagicMaps &amp; SLAA)</li> <li>All sites have been used to produce high quality crop yields each and every year and so this development would result in the permanent loss of BMV land. Given the current tumultuous climate we feel that loss of worked grade 1-2 arable land is not sustainable.</li> </ul>
X	X	X	X	<p><u>Ecology Impact</u></p> <ul style="list-style-type: none"> <li>The Ecology Report produced by BioScan Ltd on behalf of the appellant is factually inaccurate and we question the independence of the report.</li> <li>One example of factual inaccuracies within the BioScan report are house martins. BioScans' report finds that during their 17/05/19 survey, there were at most 6 house martins sighted across the village, but residents continually report sightings of a much higher numbers from March to October as they come back each year to nest and breed. The objection submitted by C&amp;CW RDG on 29<sup>th</sup> August contains multiple sources of photographic evidence of nesting and breeding house martins as well as a survey to show how many residents observe high numbers of these birds annually. Our evidence strongly indicates that there are far more than the sighted 6 house martins during the survey period, when, at certain times of day, there are so many of this breed flying above us that it would be impossible to count.</li> <li>Use of current green spaces for car parking and road widening, as well as an increase in traffic noise and pollution will have a negative impact on local ecology.</li> <li>C&amp;CW RDG are extremely concerned that the quality of the reporting, relating to the ecology of the village is inaccurate and that <u>an independent survey is required to fully assess the impact of this development on the ecology of our village.</u></li> </ul>



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We understand that the timetabled deadline for submission to grant Rule 6 status is Tuesday 14<sup>th</sup> February 2023.

We understand that Inquiries Procedure Rule 6(6) allows for 4 weeks from confirmation of Rule 6 status for a party to submit their Statement of Case. Our group have worked tirelessly as a community to evidence and challenge the information provided by the appellant. We feel that we are in a very strong position to challenge this appeal and can confirm that we will comply with the timelines if the Rule 6 status is granted.

The Cliffe and Cliffe Woods Residents Development Group would wish to make representations at the Appeal Hearing. Accordingly, we would be grateful if you could advise us of the confirmed date for the CMC in due course. If you require any further information in relation to this request for Rule 6 status, please do not hesitate to contact us.

Yours faithfully

Tim Smith  
Chairperson

For and on behalf of Cliffe and Cliffe Woods Residents Development Group