

## **MEDWAY LOCAL PLAN REGULATION 19 FORMAL CONSULTATION RESPONSE**

### **Introduction**

These representations are made on behalf of Hallam Land in partnership with Tarmac and Holcim UK (as 'the Landowners') in response to the emerging Medway Local Plan 2041 (Regulation 19) consultation. The representations focus on:

- The Duty to Cooperate
- Vision
- Spatial Development Strategy
- Policy S1 (Planning for Climate Change)
- Policy S2 (Conservation and Enhancement of the Natural Environment)
- Policy S3 (North Kent Estuary and Marshes designated sites)
- Policy S5 (Securing Strong Green and Blue Infrastructure)
- Policy S7 (Green Belt)
- Policy S10 (Economic Strategy)
- Policy S22 (Hoo Peninsula)
- Policy DM17 (Grain Branch)
- Policy DM18 (Transport Assessments, Transport Statements and Travel Plans)
- Policy S24 (Infrastructure Delivery)
- Policy SA1 (Chatham Town Centre and Surrounds)
- Policy SA2 (Heritage-led Sites)
- Policy SA5 (Strood Town Centre and Surrounds)
- Policy SA8 (Hoo St Werburgh and Chattenden)
- Policy SA13 (Frindsbury Peninsula Opportunity Area)

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### **The Duty to Cooperate**

The National Planning Policy Framework ('the Framework', December 2024 as amended February 2025) sets out the tests of soundness for local plans and spatial development strategies. Plans are only considered 'sound' for adoption if they are positively prepared, justified, effective and consistent with national policy. Paragraph 26 of the Framework is clear that "effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.

The Council sets out at Section 1.4 of the Draft Local Plan and in the supporting Duty to Cooperate Statement ('DtCS') how it considers cross-boundary strategic matters have been progressed. We do not consider that the requirements of the Framework have been met and consider the plan unsound on grounds of not being positively prepared, not being justified, and not being effective (and, by consequence, not consistent with national policy).

The strategic cross-boundary opportunity at Holborough Quarry ('the site') which is being promoted in Medway and Tonbridge and Malling by Hallam Land on behalf of Tarmac and Holcim UK is acknowledged by the Council (for example in sections 4.1 and 4.4 of the DtCS). Both Councils have visited the site, and as is described in the submitted *Reimagining Holborough Quarry: Delivery Strategy*, both Councils have been extensively engaged by Hallam Land. The Prospectus which informed that site visit ('Reimagining Holborough Quarry', November 2024) is also submitted for completeness.

However, the site is not referenced in section 3 of the DtCS, which details Medway's engagement with neighbouring authorities in relation to strategic sites, including outcomes and expectations for ongoing cooperation. As a cross-boundary strategic site, the approach to Holborough Quarry and any relevant

engagement with Tonbridge and Malling Borough Council (TMBC) should be detailed in this section of the DtCS. Again, neither the site nor engagement with TMBC are referenced in paragraphs 1.4.1 to 1.4.4 of the Plan. Notwithstanding the Council's erroneous assessment and rejection of the site (as is demonstrated in our responses to other policies, and more specifically in our commentary on the Sustainability Assessment set out in the response to the Spatial Development Strategy), the site represents a strategic matter which should be addressed in plans (per paragraph 25 of the NPPF). It is unclear, for example, whether the site was rejected and therefore not discussed between the two Councils, or whether the site was discussed, but then rejected. Absent any explanation, it is not possible to conclude that strategic cross-boundary issues have been addressed positively.

While the DtCS remains largely vague on engagement with TMBC, it is evident that Medway Council has had extensive engagement with Gravesham Borough Council (GBC). Section 3 of the DtCS states that "numerous, regular meetings have been held between representatives of Gravesham Borough Council and Medway Council". This collaborative approach has set the basis for demonstrating exceptional circumstances for potentially releasing three Green Belt sites to the west of Strood to deliver a new cross-boundary scheme of 4,000 homes (1,280 within Medway). The DtCS is also clear on future engagement with GBC, with meetings scheduled over the summer (and beyond) to discuss unmet housing need and other cross-boundary matters.

It is disappointing that comparatively limited engagement has been undertaken with TMBC (notwithstanding the earlier stage of their emerging Local Plan). Within section 4 (Green Belt) of the DtCS, reference is made to TMBC undertaking a Green Belt review and landscape character assessment to assess the land parcels being promoted as a cross-border opportunity (i.e. Holborough Quarry). However, there is no clear detail on future or ongoing engagement with TMBC on this point or on other matters related to unmet housing need. Hallam Land is highly concerned that the constructive engagement undertaken with GBC has not been extended to TMBC and there is no evidence that this will be improved as the emerging Local Plan progresses.

Given our extensive concerns regarding the assessment and rejection of the site (our representations elsewhere set out our case), we cannot conclude that the outcomes set out in the DtCS and described in paragraphs 1.4.1 to 1.4.4 and reflected in the Plan's Spatial Strategy and policies are justified, since it cannot be demonstrated that cross-boundary working has been based on proportionate and adequate evidence.

In light of the absence of evidence to the contrary, it cannot be concluded that the Plan's approach to cross-boundary working is effective. No Statement of Common Ground has been agreed with TMBC, whilst reference on page 10 under section 2.1 of the DtCS simply references TMBC as being at an early stage of local plan-making with no further actions or ongoing cooperation identified. In section 4 of the DtCS, despite reference to the cross-boundary opportunity at Holborough Quarry being referenced, no outcomes are set out for the site or its assessment, and no further ongoing cooperation with TMBC is identified.

It does not appear that matters with TMBC have been "dealt with rather than deferred", thereby falling foul of paragraph 36(c) of the Framework. The Plan is simply silent on future engagement.

Medway's inconsistent approach to engagement with neighbouring local authorities raises significant concerns regarding the effectiveness of the emerging Local Plan. The Framework requires effective strategic planning across local planning authority boundaries as this plays a "vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience". It is imperative to maintain a consistent approach across neighbouring authorities for accommodating unmet housing need (as per Paragraph 11b of the Framework), reviewing the Green Belt, responding to economic linkages and home-to-work travel patterns and subsequently mitigating cross-boundary impacts. Failure to do so

presents the risk of promoting unsustainable patterns of growth (which is inconsistent with the Council's own vision) while being wholly inconsistent with national policy.

In the above context, it is clear that Medway's approach to cross-boundary issues – irrespective of the Council's view of the prospects for the site (which we contest) – does not meet the requirements of the Framework and therefore does not accord with national policy.

In order to meet the tests of soundness, it will be necessary for the Council to demonstrate in updated and published evidence that it has engaged Tonbridge and Malling Council positively and proactively, and that it has done so without prejudice to the Council's views (which we dispute) of the suitability of the Holborough Quarry site as a cross-boundary opportunity.

## **Vision**

Section 2 (Vision and Strategic Objectives) of the emerging Local Plan sets out the Council's vision and objectives up to 2041. The Council seeks to deliver sustainable housing and economic growth through the plan period, supported by an appropriate level of infrastructure while protecting the area's natural and historic environment.

While Hallam Land support the Council's ambitious vision for Medway, the plan period itself is not appropriately defined. Firstly, Medway's Local Development Scheme ('LDS') indicates that the Local Plan will not be adopted prior to December 2026. Therefore, the end of the Local Plan period as currently defined (2040/2041) is less than 15 years. This approach is inconsistent with Paragraph 22 of the Framework which requires strategic policies to "look ahead over a minimum 15 year period from adoption". It is therefore prudent that the plan period is extended to 2041/42 to ensure that the Local Plan looks ahead a minimum of 15 years from adoption as required by national policy. It should also be noted that while adoption is anticipated at the end of 2026, any delays to programme at submission or examination stage could feasibly push adoption into 2027, further exacerbating the Council's noncompliance with the requirements of the Framework.

Secondly, there is no clarity in the emerging Local Plan as to when the Local Plan period begins. Paragraph 1.3.5 makes reference to a 15-year plan period to 2041 (notably not 15 years from adoption as required under the Framework), suggesting that the plan period begins at 2025/26. This should be clarified, especially given the discrepancy with the Medway Local Housing Needs Assessment (LHNA) which applies 2024 as the start of the plan period. We recognise that the LHNA was published in February 2025 and relied on housing stock data published in May 2024 (which was the latest available at the time). We also note that more recent housing stock data was published in May 2025 (although there is no evidence that the LHNA has since been updated to reflect this). Therefore, the latest that the plan period can start is 2025/26 as the point at which the latest baseline data was available.

Overall, the local plan period should start at 2025/26 and look up to 2041/42 to ensure that it is consistent with national policy. Based on the Local Housing Need of 1,636 homes per annum, this equates to 26,176 homes over the plan period. The Council's Land Availability Assessment indicates that the emerging Local Plan allows for a supply of 24,743 homes (comprising 21,397 from allocated sites; 1,762 from pipeline sites; and 1,584 from windfall sites) (please note discrepancy in the Local Plan figures as detailed in the next section). This results in a deficit of 1,433 homes that remain unplanned for over the plan period. Failure to address this would render the Plan unsound by virtue of being inconsistent with national policy and not being positively prepared. It is therefore imperative that the Council seeks to allocate sustainable sites to meet this need, including through releasing suitable land from the Green Belt.

## **Spatial Development Strategy**

The Spatial Development Strategy is undermined by significant flaws which challenge its overall deliverability. Our specific concerns are that there is reliance on:

- Strategic sites where there are known deliverability challenges;

- Sites in remote locations and at lower tier settlements that can't be made sustainable;
- Strategic sites that perform badly in sustainability terms and require substantive investment to mitigate inevitable adverse impacts;
- Strategic sites which are complex to deliver due to the need to coordinate multiple interests in terms of master planning and infrastructure investment; and
- Unidentified sites.

We are further concerned that land at Holborough Quarry which is not constrained in those dimensions has not been identified as being capable of meeting the growth agenda.

Our representations below demonstrate that the spatial development strategy is neither the most sustainable nor deliverable, raising significant concerns that reliance on some of these sites will inevitably lead to a shortfall in meeting housing need if carried forward (detailed further below). Coupled with this, we consider that the local housing need for the plan period has been miscalculated, resulting in a deficit of 1,433 homes (as set out earlier in the "Vision" section). This further widens the gap between local housing need and supply. The Council's evidence base already clearly demonstrates that exceptional circumstances exist to support the release of land from the Green Belt in order to accommodate Medway's local housing needs and the unmet need of neighbouring authorities (discussed further later in this section). The Council should therefore reassess its position on Holborough Quarry, a site which has very limited contributions to the functions of the Green Belt and which benefits from the Framework's definition of Grey Belt land.

Focusing on the Council's supply, it is firstly worth highlighting the discrepancies across the Local Plan documents. Paragraph 1.3.6 of the Local Plan states that allocations will deliver 21,194 homes. The Land Availability Assessment states that the yield from allocated sites is 21,397 dwellings, while the individual strategic allocation policies in the Local Plan equate to 21,595 homes. It is important that this discrepancy is rectified to ensure that there is no over-estimation of the number of homes expected to come forward from allocated sites.

The table below sets out Medway's expectations of supply from allocated sites as detailed in the individual strategic allocation Local Plan policies. We also set out our consideration of the supply that could reasonably be expected from relevant allocated sites, as supported by our commentary below.

<b>Source</b>	<b>Medway supply</b>	<b>Hallam supply</b>
Chatham Town centre	1,350	1,350
Interface Land	150	150
Star Hill to Sunpier	474	474
Gillingham District Centre	100	100
River Waterfront	4,197	4,197
Strood Town Centre and Surrounds	1,079	1,079
Land West of Strood	1,280*	1,280
Capstone Valley	3,958	3,958
Hoo St Werburgh and Chattenden	5,300	3,855
High Halstow	820	820
Lower Rainham	750	750
7 allocations at rural settlements	566	283
23 disparate individual site allocations	881	440

Source	Medway supply	Hallam supply
Frindsbury Peninsula Opportunity Area	690	350
Pipeline	1,762	1,762
Windfall	1,584	1,584
Total	24,941	21,670
Shortfall against LHN / requirement	1,235	4,506

#### *Reliance on sites with known deliverability challenges*

Our representations to Policies SA1 (Chatham Town Centre), SA2 (Heritage-led Sites) and SA5 (Strood Town Centre) demonstrate that there is significant housing capacity which is expected to be delivered early in the Plan period from sites which were allocated in the adopted 2004 Medway Plan and have still not been delivered. They are again allocated but no certainty exists that impediments which have prevented their development over the last twenty years have been addressed, nor that there is certainty that they can, and will, be delivered. We estimate that more than 500 dwellings were identified in the 2004 Medway Local Plan and remain undelivered. Reliance on these sites is not justified in the terms of the Framework.

In addition, while the Council's brownfield-first approach is welcomed, this should be weighed against the complexities faced by these sites which make them particularly challenging to deliver within Local Plan timescales. Matters relating to remediation and contamination may result in significant delays to delivery. Viability also adds a further layer of complexity, with the Council's own viability evidence warning against reliance on brownfield sites. The Council's evidence indicates that two key brownfield sites proposed for allocation (Chatham Docks and Gillingham Waterfront) are collectively expected to deliver almost 4,000 homes. However, both sites have limited capacity in viability terms to accommodate affordable housing and expected levels of developer contributions. It is therefore likely that further viability discussions will need to take place at application stage. Based on the outcome of the viability assessment, Policy T3 (Affordable Housing) proposes a relatively low 10% affordable housing requirement for brownfield sites (this equates to a combined affordable housing provision of 400 homes at Chatham Docks and Gillingham Waterfront). This is particularly relevant in Medway, where house prices reach over 8x average earnings (ONS, 2024). It therefore remains crucial to ensure that delivery is not stalled/delayed, and that appropriate levels of affordable homes is supplied, to mitigate against worsening affordability issues.

For comparison, the Council's viability evidence indicates that greenfield sites can accommodate tested levels of developer contributions, and larger (200+ dwellings) Grey Belt sites can also accommodate the required additional 15% of affordable housing (as set out in paragraph 157 of the Framework). The affordable housing requirement for greenfield sites ranges from 25% in low value areas to 30% in high value areas. Should Holborough Quarry come forward, this site alone could deliver up to 450 affordable homes within Medway (30% policy requirement plus 15% requirement as a Grey Belt site). The Spatial Development Strategy should therefore seek to explore additional opportunities for sites that are deliverable across the Plan period and that will bring forward the levels of affordable homes needed in this area. The current reliance on older and more complex sites undermines the deliverability of the Plan and is therefore not justified or effective in the terms of the Framework.

Our representation to Policy SA13 (Frindsbury Peninsula) demonstrates that this site relies on transformational change to bring forward delivery. Existing and established businesses need to be relocated to facilitate development, with significant new investment required to address environmental conditions to address both the industrial legacy of the site and to create an environment suitable for new homes. That is achievable, as Rochester Riverside and St Mary's Island demonstrate, but that change

takes time and investment. Whilst we consider that transformation may be possible, it is not possible in the timeframes assumed by the Council. The housing trajectory assumes first delivery for this site will be in 2036/37 with 138 homes per annum being delivered from the first year. This is unrealistic for a complex brownfield site. Research undertaken by Lichfields (Start to Finish 3rd Edition, March 2024) indicates that brownfield sites are only likely to deliver between 41 to 102 dpa, with a median build-out rate of 68dpa (around 34% slower than their greenfield counterparts). This suggests that the delivery of 690 dwellings within the plan period is unrealistic. Reliance on substantial delivery on this site during the Plan period is optimistic and cannot be considered effective in the terms of the Framework.

#### *Sites in remote locations and at lower tier settlements*

The Local Plan proposes 7 allocations at rural settlements (comprising 566 homes) and an additional 23 disparate individual site allocations (comprising 881 homes). This is inconsistent with the Council's vision for delivering sustainable patterns of growth; encouraging modal shift; ensuring the people of Medway have sufficient access to necessary facilities; and achieving a significant reduction in carbon emissions. Indeed, a "Dispersed Growth" spatial growth option was considered and discounted at Regulation 18 stage of the Local Plan as it raised "issues of sustainability (including) higher reliance on car-based transport, a greater loss of good quality farmland and wider environmental impacts". It is unclear how these almost 1,500 homes can come forward sustainably without undermining the Local Plan vision and the objectives of the Framework. This approach is neither justified nor consistent with national policy and reliance on these sites should drastically be reduced.

#### *Strategic sites that perform badly in sustainability terms and require substantive investment*

Our representations to Policy SA8 (Hoo St Werburgh and Chattenden) express considerable concerns about the deliverability of sites on the Hoo Peninsula. The Sustainability Appraisal and the Council's own narrative notes that sites are subject to significant constraints if not mitigated. These include the Peninsula being an inherently unsustainable location in transport terms, sites' proximity to numerous sensitive European-designated habitats; long-term vulnerability to climate change; and, the need for early delivery of services and costly infrastructure. It is evident that the extensive infrastructure demands on sites in the Hoo Peninsula challenge the notion that the Spatial Strategy is justified, but more significantly, that it will be effective. The Land Availability Assessment estimates that some 1,400 homes will come forward from this site within the first five years of the Local Plan. This is unrealistic and should be reflected in an updated trajectory.

#### *Reliance on sites which are complicated to deliver*

Our representatives to Policy SA8 (Hoo St Werburgh and Chattenden) and SA13 (Frindsbury Peninsula) demonstrate that there is a need to coordinate multiple sites' obligations to deliver infrastructure. The Council has been working for some time to coordinate development, but it is evident that the Council's deliverability and timing expectations are optimistic given the remaining requirements set out in policy. The Strategy cannot therefore be effective.

These factors, taken individually and together, indicate that the Strategy is challenging, and that additional safeguards, including use of sites which are less constrained and more suitable, must form part of the Plan. Without such changes, the Spatial Strategy is neither justified nor is it likely to be effective. Our representations to the referenced policies set out our detailed concerns.

#### *Addressing the shortfall*

The table above demonstrates that, even with the Council's current supply assumptions, there is a deficit in meeting housing need. This shortfall is further exacerbated when more realistic assumptions regarding the deliverability of particularly challenging sites, especially within the first five years of the Local Plan, are established.

### *Holborough Quarry*

In light of the above, we strongly suggest that the Council reconsiders its assessment/rejection of Holborough Quarry – a unique cross-boundary site in a highly sustainable location for development with minimal barrier to delivery once outline consent is granted.

Firstly, the Council's evidence base clearly demonstrates that exceptional circumstances exist to support the release of land from the Green Belt in order to accommodate Medway's local housing needs and the unmet need of neighbouring authorities. Our representations further demonstrate that the plan period has not been correctly defined and therefore the local housing need set out in the Local Plan has been underrepresented by 1,433 homes. There are also inconsistencies with the supply relied upon, which further widens the gap between need and supply. The acute affordability issues in Medway demonstrates how critical it is to identify sufficient deliverable sites to secure an adequate supply stream across the plan period. The Council will therefore need to identify additional sites to ensure that local needs are met, otherwise the Local Plan falls short of being positively prepared.

Where there is demonstrable unmet need, as is the case in Medway, the Framework supports the utilisation of Grey Belt land where such land does not strongly contribute to purposes (a), (b), or (d) of the Green Belt, and where it is not affected by the provisions of Footnote 7. Our representations to Policy S7 (Green Belt) demonstrate that Holborough Quarry constitutes Grey Belt land and should be identified as such.

Through extensive engagement with GBC, the Council has identified land to the west of Strood for release from the Green Belt and allocation. Hallam has raised significant concerns over the comparatively limited levels of engagement with TMBC and lack of evidence that future engagement will be undertaken to fully consider the potential of the cross-boundary opportunity at Holborough Quarry. The site provides a sustainable Grey Belt location to deliver up to 1,000 homes towards Medway's unmet need, and not exploring this option fully renders the Council's approach unjustified and ineffective and the Local Plan inconsistent with national policy.

Secondly, the Council's Sustainability Appraisal (Table I.4.1, post-mitigation assessment of strategic sites) demonstrates that Holborough Quarry (ref: CHR4) is one of the best performing sites considered as shown on Figure 1 overleaf.

**Figure 1:** Sustainability Assessment Post-Mitigation Assessment of Strategic Sites

Site ref.	Site use	1 Climate change mitigation	2 Climate change adaptation	3 Biodiversity and geodiversity	4 Landscape and townscape	5 Pollution and waste	6 Natural resources	7 Housing	8 Health and wellbeing	9 Cultural heritage	10 Transport and accessibility	11 Education	12 Economy and employment
AS13	Residential led (Mixed-use)	+/-	-	+/-	-	--	--	++	-	0	-	0	+
AS21	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
AS22	Residential led (Mixed-use)	+/-	-	+/-	-	--	--	++	-	0	-	+	++
AS24	Non-residential	+/-	-	--	-	--	-	0	-	0	-	0	0
AS26	Non-residential	+/-	-	--	-	--	-	0	-	0	-	0	0
CHR4	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	++	++	++
HHH12	Residential led (Mixed-use)	+/-	+	--	--	--	--	++	-	0	-	+	++
HHH22	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	+	++	++
HHH22/H HH31	Residential led (Mixed-use)	+/-	-	+/-	-	--	--	++	-	0	-	++	++
HHH26	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
HHH3	Residential led	+/-	+	--	-	--	--	++	-	0	-	+	++
HHH31	Residential led (Mixed-use)	+/-	-	+/-	-	--	--	++	-	0	++	0	++
HHH35	Non-residential	+/-	-	+/-	-	--	--	0	-	0	+	0	++
HHH36	Non-residential	+/-	-	--	-	--	-	0	-	0	-	0	0
HHH6	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
HW1	Residential led	+/-	+	+/-	-	--	-	++	-	0	-	0	++
LW6	Residential led	+/-	+	+/-	-	--	--	++	-	0	-	+	+
LW8	Residential led	+/-	+	+/-	-	--	--	++	-	0	-	0	++
RN8	Residential led (Mixed-use)	+/-	+	+/-	-	--	-	++	-	0	++	0	++
RN9	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	+	0	++	++	++
RSE10	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	++	+	++
SMI5	Non-residential	+/-	-	-	-	--	+	0	+	0	++	0	0
SMI6	Residential led (Mixed-use)	+/-	-	-	-	--	+	++	+	0	++	+	+
SNF3	Residential led	+/-	+	+/-	-	--	--	++	-	0	+	0	++
SR17	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
SR9	Residential led (Mixed-use)	+/-	+	+/-	-	--	--	++	-	0	-	+	++
SR53	Residential led (Mixed-use opportunity area)	+/-	+/-	-	+/-	--	-	++	-	0	+	+	+

Source: Medway Local Plan Sustainability Appraisal - Volume 3 of 3: Appendices (Table I.4.1)



Firstly, it is one of only 7 strategic sites (out of 27) that has been assessed as providing a Major Positive (++) effect on **SA10 (Transport and Accessibility)**. Notably, only 3 of these strategic sites (sites RN8, RN9 SM16) have been selected for allocation. This approach is not consistent with the Council's vision and strategic objectives for sustainable growth and access to sustainable travel choices for people in Medway.

As recognised through the SA, Holborough Quarry is in a highly sustainable location for development in transport and accessibility terms. There are excellent links to existing rail stations and other public transport services, and opportunities to connect and enhance this existing provision will be explored through any future development to support aspirations towards modal shift and minimising reliance on vehicular movements.

Holborough Quarry also scores highly for Objectives **SA7 (Housing)**, **SA11 (Education)** and SA 12 (Economy and Employment). For SA11, Hallam Land welcomes an update to the scoring from Negligible (0) at Regulation 18 to the more accurate Major Positive (++) in the most recent Regulation 19 assessment. Again, only 2 of the selected strategic sites (sites HHH22/HHH31 and RN9) score as highly as Holborough Quarry. The site is also assessed to provide Minor Positive (+) effects for Objective **SA2 (Climate Change Adaptation)**, a better assessment than that of some sites that have been selected for allocation (including HHH22/HHH31, HHH35, HHH36, SM16 and SR53).

It is noted that the assessment of Objectives **SA1 (Climate Change Mitigation)** and **SA5 (Pollution and Waste)** are the same across all strategic sites. Given the nature of development, this approach is accepted.

The assessment also categorises all strategic sites as providing Negligible Impact (0) for Objective **SA9 (Cultural Heritage)**. However, the unique opportunity that Holborough Quarry presents to deliver new and positive cultural and industrial heritage interpretation has not been considered by the SA, and our previous comments on this have not been addressed in Table C.2.1.

Further detail on the assessment of SA9 is provided in Section F.10 and Table F.10.1 (Strategic sites impact matrix for SA 9). Table F.10.1 suggests that site CHR4 has a Minor Negative (-) impact on a Grade II Listed Building and Halling Conservation Area. However, the Grade II listed Clement's Farm House lies on the western extent of the site boundary some 20m above an existing quarry which is not proposed to accommodate built development. We do not consider there to be any basis for assuming adverse impacts on the listed building given that context. In terms of Halling Conservation Area, it is imperative to consider the wider context, including the intervening physical presence of the railway and the A228 between the site and the conservation area. Furthermore, the illustrative masterplan shows how development is set back from the A228, with extensive SuDS, demonstrating how a scheme could be delivered sensitively in this location.

In terms of perceived negative effects, it is noted that Holborough Quarry, as with most other sites, is assessed as providing Minor Negative (-) effects for Objectives **SA4 (Landscape and Townscape)** and **SA8 (Health and Wellbeing)**. It is anticipated that a development of this scale will be subject to planning policy requirements for requiring the delivery of and/or contributions to health facilities which would result in a positive effect. Similarly, the effects for SA3 (**Biodiversity and geodiversity**) are assessed as uncertain (+/-) as with most sites, although national and local policy requirements will require biodiversity enhancements. It should be noted that at least two strategic sites that have been selected for allocation (HHH12 and HHH36) are assessed as providing a Major Negative (--) effect for SA3.

Finally, it is acknowledged that majority of sites are assessed as providing a Major Negative (--) effect for Objective **SA6 (Natural Resources)**. Table F.7.1 (Strategic sites impact matrix for SA 6) indicates that this assessment stems from perceived major negative effects for the loss of Best and Most Valuable land under the Agricultural Land Classification (ALC). While Holborough Quarry incorporates BMV land,

this falls under Grades 2 and 3, rather than Grade 1 associated with other sites. Furthermore, much of the site is subject to disturbance through quarrying or implementation of the cement works permission and therefore cannot be assumed to accord with Natural England's broad-scale assessments.

**Figure 2:** Impact Matrix for Holborough Quarry against SA Sustainability Objectives (post-mitigation)

Ref	Sustainability Objectives	Medway Assessment	Hallam Assessment
1	Climate change mitigation	+/-	+/-
2	Climate change adaptation	+	+
3	Biodiversity and geodiversity	+/-	+/-
4	Landscape and townscape	-	-
5	Pollution and waste	--	--
6	Natural resources	--	-
7	Housing	++	++
8	Health and wellbeing	-	+
9	Cultural heritage	0	+
10	Transport and accessibility	++	++
11	Education	++	++
12	Economy and employment	++	++

Despite Holborough Quarry's better performance when compared to other sites, the SA (Table J.1.1, Outline reasons for selection and rejection of reasonable alternative strategic site) rejects the site on five grounds. As set out above, none of the identified reasons for rejection are justified, particularly when considered against the performance of the selected sites;

- Loss of BMV agricultural land:** on the basis of Natural England's Provisional Agricultural Land Classification (accessed via the Magic Map application), Holborough Quarry incorporates Grades 2 and 3 soils. However, much of Holborough Quarry is subject to disturbance through quarrying or implementation of the cement works permission and therefore cannot be assumed to accord with Natural England's broad-scale assessments. In any case, Holborough Quarry's classification is comparable with other parts of Medway and is of a lower grading than other areas, including Hoo Peninsula which is Grade 1 Agricultural Land. Other sites which are indicated to have a higher ALC have not been rejected on these grounds. We therefore have significant concerns with the inconsistency in the approach to the ALC and site selection process. This inconsistency is not justified in the terms of the Framework.
- Within the Green Belt:** Our representations are supported by a Medway Green Belt and Landscape Character Assessment Review (David Jarvis Associates (DJA), August 2025) which challenges the findings of the Council's in-house Green Belt Review. DJA's report demonstrates that the individual Green Belt parcels within the Holborough Quarry site make, at best, moderate to low / limited contribution to the five purposes of the Green Belt. Notwithstanding this point, the Framework supports development in the Green Belt where "the development would utilise grey belt land". The Framework then defines Grey Belt as "land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143". The submitted DJA report demonstrates that the Green Belt parcels within the Holborough Quarry site make no contribution to Purposes (a), (b) or (d). On this basis, the site is considered to be grey belt and therefore this reason for rejection is considered unsound, not justified and inconsistent with national policy.
- The development could lead to coalescence between settlements:** From a Green Belt, it is worth highlighting that Holborough Quarry lies between Strood and Snodland, both villages (not towns) and therefore not considered a determining factor under the assessment of purpose (b) of the Green Belt. This is detailed further in our representations to Policy S7 (Green Belt) and

supporting DJA Green Belt report. Notwithstanding, detailed master planning, allied to appraisal and mitigation of landscape and townscape impacts would allow potential concerns regarding coalescence to be addressed. We consider it inconsistent that Holborough Quarry is rejected on this ground, whilst others (which score equally) are not. Again, there is a clear inconsistency in how the evidence base is being used to inform the site selection process.

- **Potential adverse impact on listed building:** The Grade II listed Clement's Farm House lies on the western extent of the site boundary some 20m above an existing quarry which is not proposed to accommodate built development. An initial Desk-Based Assessment prepared by SLR did not identify Clement's Farm House for further assessment based on its location within or in proximity to, the site boundary. It was considered unlikely that this asset would be affected by the development taking into account the intervening distance between the asset and the site, the lack of any material inter-visibility, and the lack of any 'third points' from which both would be visible to a material extent within the same view-shed, negates the potential for development within the site to adversely affect the heritage significance. We therefore do not consider there to be any basis for assuming adverse impacts on the listed building given that context, and do not consider rejection on this ground to be justified. Indeed, other sites which have scored equally or more poorly have been carried forward as a draft allocation. This includes sites HHH22/HHH31 which is adjacent to 'Four pillarboxes' and Site RN9 which is adjacent to 'Pump Farmhouse'.

In terms of Halling Conservation Area, it is imperative to consider the wider context, including the intervening presence of the railway, the A228 and other built development between the site and the conservation area. Furthermore, the illustrative masterplan shows how development is set back from the A228, with extensive SuDS, demonstrating how a scheme could be delivered sensitively in this location. Therefore, site rejection on this basis is not considered justified.

- **Local impacts associated with consented Lower Thames Crossing noted in this location:** Our representations are supported by a Transport Technical Note (DHA, August 2025) which provides a review of the Council's transport policies and technical evidence base as it relates to Holborough Quarry. The Council's own evidence indicates that in all scenarios (including where the Lower Thames Crossing is modelled), the A228 Peter's Bridge Roundabout (which would provide access to the Holborough Quarry site) has sufficient capacity to accommodate flows. By contrast, other selected sites such as those around the Hoo Peninsula and to the north of Chatham and Gillingham town centres raise significant highway concerns, even in post-mitigation scenarios. This reason for refusal contradicts the Council's own evidence base and the Council's approach is therefore inconsistent and not justified.

Overall, Holborough Quarry is a unique cross-border opportunity located in a highly sustainable location for development. The site is in Flood Zone 1 and has no environmental constraints that would preclude development at the site. It also benefits from an existing highway access point, excellent strategic transport connections, and opportunities to connect to and enhance these connections to support the Council's aspirations for modal shift and minimising reliance on vehicular movements.

The site performs strongly when assessed against the Council's sustainability objectives, indeed outperforming some sites that have been selected for allocation. In addition, Hallam Land has submitted evidence to demonstrate that the site constitutes Grey Belt as defined in the Framework. Therefore, there is strong justification for removing the site from the Green Belt to help contribute up to 1,000 new homes to Medway's identified housing need. This reinforces the vision for strategic thinking and cross-boundary collaboration to deliver the sustainable growth required in the area. Our representations also demonstrate why the reasons for rejecting the site are not justified.

Holborough Quarry is available, deliverable, and achievable. It is anticipated that first completions could be delivered within five years and, as a strategic site with opportunities for simultaneous build-out phases, annual delivery rates could remain high throughout the build-out period. This aligns with the

Council's sustainability and development objectives and should be considered in the context of its strategic benefits.

### **Policy S1 (Planning for Climate Change)**

Policy S1 is intrinsically linked to the Plan's Spatial Development Strategy. The Policy requires development to address climate change through effective spatial planning, and through mitigating and adapting to climate change. In our view, the most effective way to achieve those ambitions is to plan for development which can most easily and intrinsically meet those objectives, and which is therefore less reliant on mitigation.

#### *Effective spatial planning and placemaking*

Policy S1 requires the spatial strategy to direct growth to locations that provide better access to services, or which are capable of delivering improved services, to reduce the need to travel, to design for walking and cycling and providing low carbon choices. Our representations to Policy SA8 (Hoo St Werburgh and Chattenden) demonstrate that the Hoo Peninsula does not perform well against those objectives. The requirements of Policy S24 (Infrastructure Delivery), the Infrastructure Delivery Plan and the Viability Assessment demonstrate that significant investment is required in social and transport infrastructure to mitigate adverse impacts which would otherwise arise, and that coordination of that investment is required if it is to be successful (paragraph 14.9.12 and elsewhere), but that the cost, per dwelling, of those obligations makes the Hoo Peninsula an extremely expensive location to deliver development. The planning obligations are assessed by the Plan's Viability Assessment to be almost £10,000 more expensive per dwelling than other strategic locations. Those costs exclude infrastructure which would offer better prospects of underpinning sustainable movement, such as upgrades to the Grain railway line. Without HIF funding, and without Network Rail's investment programme (see 'Proposed Infrastructure, page 11 of the Infrastructure Delivery Plan), those costs would fall to developers.

Policy S1 also requires the mitigation and adaption of climate change. Our representatives to Policy SA8 (Hoo St Werburgh and Chattenden) and Policy SA13 (Frindsbury Peninsula Opportunity Area) demonstrate that the Hoo Peninsula, the Finsbury Peninsula and the central urban parts of the Medway Towns are most vulnerable and will require the greatest mitigation. Principles of sustainable development, national planning policy and the provisions of Policy S1, directs development first to locations which are least constrained. The Spatial Development Strategy does not do that, and so the requirements of Policy S1 cannot be met. The Policy is therefore inconsistent with other parts of the plan, inconsistent with national policy, and is therefore not justified.

### **Policy S2 (Conservation and Enhancement of the Natural Environment)**

Policy S2 seeks to conserve, restore and enhance Medway's environmental assets. The Council's Interim Habitat Assessment cannot conclude whether the air quality impacts of development at the Hoo Peninsula will or will not impact upon the integrity of the North Kent Marshes European Sites (paragraphs E6 and E11 refer). The Habitat Assessments cannot either conclude, on a precautionary basis (as is enshrined in legislation) that there will be no adverse impact on the integrity of European designated sites from recreational impacts. This is reflected in the wording of Policy S2, which notes, in respect of the Hoo Peninsula Strategic Environmental Programme, that a strategic approach has not yet been developed to establish and implement a strategic programme of actions. While additional safeguards are established through Policy S3, the evidence available cannot, at present, conclude that impacts can be avoided. We further note that the Infrastructure Delivery Plan sets out a combined cost of more than £22m to mitigate environmental impacts at the Hoo Peninsula. It would be preferable, in sustainability and economic terms, to focus development on sites which do not require such extensive mitigation. Policy S2 cannot therefore be demonstrably met by the spatial strategy on the evidence available. The Policy cannot be found to be effective as the Plan, as a whole, is currently presented.

### **Policy S3 (North Kent Estuary and Marshes designated sites)**

Our concerns in relation to the consequences of the Spatial Development Strategy on the effectiveness of Policy S2 are brought to focus under Policy S3. Given the conclusion set out in the Interim Habitat Assessment that adverse air quality and recreational disturbance impacts on designated habitats cannot be ruled out, the efficacy of the measures proposed in Policy S3 can be challenged. At present, the evidence does not demonstrate that Policy S3 will be effective.

### **Policy S5 (Securing Strong Green and Blue Infrastructure)**

Policy S5, as illustrated in Figure 2 (*Green and Blue Corridors*) is not substantiated by evidence. Our Regulation 18 representations sought clarity on the derivation of the blue watermarked areas on Figure 2, which are required to be conserved and enhanced under Policy S5 (although the policy does not make any further defined reference to blue infrastructure). The extensive areas of blue, which appear in areas such as the Capstone Valley and Medway Valley extend some distance from rivers, are not explained, justified nor evidenced. The blue areas do not appear in the key for the plan. Policy S5 cannot be effective nor can it be justified if it relies on areas which are defined without explanation, purpose or where their function is not explained.

### **Policy S7 (Green Belt)**

Section 4.12 of the draft Local Plan sets out the Council's approach to the Green Belt, with paragraph 4.12.3 noting that an in-house Green Belt review (MGBR) was undertaken by the Council in 2025. Hallam Land supports the preparation of this review as an important consideration for delivering Medway's Local Housing Need. However, there are inconsistencies that deem the findings of the report erroneous, and our representations seek to challenge the approach to specific Green Belt parcels as detailed below.

Hallam Land have commissioned a review of the MGBR, the outcome of which forms part of our representations in the form of a Medway Green Belt and Landscape Character Assessment Review (David Jarvis Associates (DJA), August 2025). The MGBR splits the Holborough Quarry site into three separate Green Belt parcels (15, 16 and 20).

The DJA assessment firstly challenges the Council's approach to defining Green Belt parcels for assessment. The parcel sizes vary considerably across the assessment and there is no clear reasoning for this approach. For example, the strong boundary features (e.g. woodland blocks quarries and lakes) within the substantial Parcel 20 have not been used to establish smaller individual parcels. This is not consistent with the methodology set out in the MGBR and undermines the ability to adequately compare sites against each other.

DJA also demonstrate that parcels 15, 16 and 20 makes, at best, moderate to low / limited contribution to the five purposes of the Green Belt:

- **Purpose (a) (to check the unrestricted sprawl of large built-up areas):** The DJA assessment demonstrates that the areas of the site that fall within Parcels 15, 16 and 20 are related to the villages of Halling and Upper Halling. The MGBR does not consider Halling to be a large built-up area. The PPG also states that villages are not considered to be large built up areas. Therefore, the site makes no contribution to Purpose (a).
- **Purpose (b) (to prevent neighbouring towns merging into one another):** The DJA assessment demonstrates that the areas of the site that fall within Parcels 15, 16 and 20 are related to the villages of Halling and Upper Halling. The MGBR considers Strood and Gravesend to be classified as towns. Snodland in TMBC is also defined as a town. Parcels 15, 16 and 20 only make a very small/negligible part of the gap between Snodland and Strood and make no contribution to visual separation between the two towns. Therefore, the site makes no contribution to Purpose (b).

- **Purpose (c) (to assist in safeguarding the countryside from encroachment):** The boundaries of parcels 15, 16 and 20 are largely well defined by woodland, hedges and former quarry faces. The eastern half of parcels 15 and 16 are more influenced by the relationship with Halling, while the western part is more remote and associated with Upper Halling. The part of the site that falls within parcels 15 and 20 would result in a change to the rural character of the area but it would not be overwhelmed by urbanising influences. These parcels make moderate contributions to Purpose (c).
- **Purpose (d) (to preserve the setting and special character of historic towns):** The MGBR identifies Strood, Rochester, Chatham, Gillingham and Rainham as the only historic towns and accepts that the “historic cores of the towns of Rochester and Strood are far removed from the Green Belt boundary”. The DJA assessment demonstrates that despite the MGBR’s attempts to link the entire river valley to the setting of the historic towns of Rochester and Strood, the area of the site within parcels 15, 16 and 20 do not form part of the setting of a historic town and have no visual, physical, or experiential connection to the historic aspects of the town. Therefore, the areas of the site within those parcels make no contribution to Purpose (d).
- **Purpose (e) (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land):** The MGBR assigns a moderate contribution to all sites, effectively neutralising Purpose (e).

Notwithstanding the above assessment, the Framework supports development in the Green Belt where “the development would utilise grey belt land”. The Framework then defines Grey Belt as “land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143” or areas affected by Footnote 7.

The submitted DJA report demonstrates that the Green Belt parcels within the Holborough Quarry site make no contribution to Purposes (a), (b) or (d). In addition, no part of the site (or indeed parcels 15 and 16 in their entirety) lies within the Kent Downs National Landscape (KDNL). The setting of National Landscapes or National Parks is not part of the designation of a National Landscape nor is it mentioned in Footnote 7. Therefore, the provisions of Footnote 7 are not a determining factor. On this basis, the site is considered to be grey belt and the decision not to release it as such is unsound, not justified and inconsistent with national policy.

Furthermore, the DJA report highlights that great emphasis has been placed on the relationship between the urban area of Medway and Gravesend to the west. Despite the distance between the urban area of Medway and Snodland being very similar, this relationship is barely mentioned. Where it is addressed, it is done so incorrectly. The release of Holborough Quarry from the Green Belt needs to be considered in the context of the cross-boundary opportunity with TMBC and the Concept Masterplan.

### **Policy S10 (Economic Strategy)**

Policy S10 sets out the Council’s Economic Strategy, and although the Employment Needs Assessment has been published, Policy S10 does not set out the anticipated floorspace volumes or land hectarages required. It is not clear in Policy, whether and how the proposed loss of employment land at the Frindsbury Peninsula has been considered. The Employment Need Assessment notes at paragraph 8.4 that protection is needed “for the foreseeable future” of existing industrial stock, notably at the Medway City Estate. The Council (in paragraph 14.15.6) references the opportunity for existing uses to relocate to the Hoo Peninsula and Grain, but the Employment Needs Assessment concludes at paragraph 8.6 that there is concern at the remoteness of that location and that it is not a location where higher employment generating uses would be located. The spatial strategy therefore appears disjointed, with losses of employment land assumed to be offset by land which the Council’s own evidence considers less suitable. The Economic Strategy needs to explicitly address the relocation of existing users at the Medway City Estate if a regeneration strategy is to be justified for that location.

### **Policy S22 (Hoo Peninsula)**

Policy S22 requires the provision of new service facilities on the Hoo Peninsula to meet the needs of new development. Paragraph 8.12.1 acknowledges that existing provision for residents is sparse, and that unsustainable travel patterns arise because of that. However, Policy S22 does not set out the need for early delivery of facilities (which would address unsustainable travel patterns), nor does the Policy address the conflict between early provision – which engenders sustainable travel habits – and the commercial need for critical population mass to support delivery. Left unresolved, this tension would tend to mean a delay in the provision of new services, perpetuating existing unsustainable travel choices and thereby conflicting with the requirements of Policies S22 and SA8. In order to be effective, the Policy should set clear timing expectations for the delivery of new retail and service facilities.

Furthermore, our representations are supported by a Transport Technical Note (DHA, August 2025) which demonstrates that parts of the network around the Hoo Peninsula raises significant highways concerns, even in post-mitigation scenarios. The report highlights that the rural and semi-rural locations of some of the strategic sites around the Hoo Peninsula and their distance from larger urban centres and the rail network will make mode shift to more sustainable transport much more difficult to achieve. The delivery of a Bus Rapid Transit (BRT) scheme is mooted, but this carries significant risks related to viability, timescales for delivery and the impact of the absence of the BRT in the early years of development. It is unclear how these matters will be mitigated without undermining the sustainability and transport objectives of the Draft Local Plan. This needs to be clearly addressed to ensure deliverability, and absence of this detail makes this Policy unsound and not justified.

### **Policy DM17 (Grain Branch)**

The Grain Branch line is an essential element in creating sustainable transport patterns for development at the Hoo Peninsula. Previously awarded HIF funding now withdrawn means there is no certainty that passenger services – essential for reducing reliance on the private car – can or will be delivered. The Infrastructure Delivery Plan does not make any provision for the railway, despite the Plan recognising at paragraph 9.4.6 that existing patterns of travel are unsustainable.

The Council's HIF bid<sup>1</sup> identifies the adverse impacts of not securing funding, noting that:

*"Key infrastructure is needed to support viable housing development, access to jobs and foster demand for housing. Current plans and brownfield sites carry uncertainty and risk considering the range and scale of development need."*

*"The Council and government share an ambi[t]ion to deliver long lasting sustainable transport projects. Lesser investment would not allow the delivery of the blended model required to deliver our package of solutions."*

The bid elsewhere demonstrates the extensive work required to upgrade the rail line for passenger use, at an indicated cost of almost £64m (see document page 51).

Whilst the safeguarding of the line is important, we note that the considerable funding deficit means that there is limited prospect of any immediate upgrade, and that the prospects of establishing fully sustainable travel patterns at the Hoo Peninsula are therefore diminished.

### **Policy DM18 (Transport Assessments, Transport Statements and Travel Plans)**

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<sup>1</sup> See document page 9 of the Freedom of Information request, available at [https://assets.publishing.service.gov.uk/media/63da7c4ed3bf7f252c957f95/RFI3964\\_-\\_Medway\\_HIF.pdf](https://assets.publishing.service.gov.uk/media/63da7c4ed3bf7f252c957f95/RFI3964_-_Medway_HIF.pdf)

We note the requirements for an area-wide travel plan to be prepared, agreed and adhered to, as set out in Policy DM18. Our representations to other policies demonstrate that the coordination of development across sites which are to be delivered at different times, in different control and at different scales is necessary. No mechanism is set out for achieving agreement, nor for its implementation. Paragraph 9.11.8 of the Plan provides little further indication of how the travel plan is to be prepared. Without clarity and certainty, it cannot be concluded that Policy DM18 will be effective.

### **Policy S24 (Infrastructure Delivery)**

Policy S24 requires development to deliver or contribute to new infrastructure required to serve development. It is evident that the Hoo Peninsula will require significant new infrastructure if adverse impacts are to be avoided. This includes:

- Extensive new highways improvements (Policy SA8, bullet 15) and public transport investment and coordination (Policy DM17) which are required to avoid unsustainable travel patterns but which are estimated to cost at least £96m (Infrastructure Delivery Plan, Table 8.11).
- New community and service facilities (Policy S22) which are required to address existing deficiencies in provision (paragraph 8.12.1) but which have no coordinated strategy.
- Mitigation for anticipated impacts on sensitive European designated sites (Policy S3) which are estimated to cost in the region of £22m (Infrastructure Delivery Plan, page 104) but which do not yet have a coordinated strategy in place, and where no conclusion can yet be reached that mitigation will be effective.
- A total S106 package which has been estimated at £35,283 per dwelling, almost £10,000 per dwelling more than other assessed locations within Medway (Local Plan Viability Assessment, Table 8.11).

The Council proposes to make use of S.106 agreement (paragraph 10.5.8) in place of CIL (paragraph 10.5.9) and notes pooling is expected to provide an effective mechanism (paragraph 9.2.7). Given the extensive and varied infrastructure obligations, greater certainty is required about how complex contribution and delivery mechanisms will be coordinated, and offer greater clarity to substantiate the delivery trajectory which the Council has set out. Absent that clarity, there can be no certainty that infrastructure for the Hoo Peninsula will be delivered, that necessary mitigation will be delivered and that the Plan's Spatial Development Strategy will be achieved. The Policy is therefore not effective.

### **Policy SA1 (Chatham Town Centre and Surrounds)**

Policy SA1 allocates around 1,350 new dwellings within Chatham Town Centre and its surroundings. The Council's ambitions for Chatham are supported, and the priority afforded to the use of brownfield land meets national planning policy objectives. We are concerned, however, that some sites are likely to be challenging to deliver. Land at the Brook Street Car Park (site reference CCB31) includes land that was allocated as site ME383 in the adapted 2004 Medway Local Plan but remains undelivered. The Council considers that the site will deliver within the first five years of the Plan, but evidence does not substantiate that. Whilst planning permission was granted in February 2022, the necessary further approvals have not been secured to allow development to commence in accordance with the statutory commencement timeframes. Caution is therefore needed with respect to the prospects for this site. Given that the sites identified under Policy SA1 contribute around 40% of the planned growth in Medway during the Plan period, and that every allocated site is identified as delivering in part or in full within five years, we consider the delivery trajectory to be optimistic and not justified.

Furthermore, our representations are supported by a Transport Technical Note (DHA, August 2025) which demonstrates that parts of the network around the Hoo Peninsula raises significant highways concerns, even in post-mitigation scenarios. It remains unclear how these matters will be mitigated without undermining the sustainability and transport objectives of the Draft Local Plan. This needs to be clearly addressed to ensure deliverability, and absence of this detail makes this Policy unsound and not justified.



### **Policy SA2 (Heritage-led Sites)**

Policy SA2 allocates more than 620 dwellings to heritage-led sites. Medway has a rich architectural legacy, and considerable efforts have been made to bring forward high quality development on heritage sites. That ambition is supported.

Sites CCB25, FP1 and FP11 have a combined capacity of almost 300 dwellings and were allocated in the 2004 Medway Local Plan (site references ME113, ME386 and ME407, respectively). Sites CCB25 and FP1 are expected to deliver in years 6-10 of the Plan, suggesting that they will potentially take more than 25 years to deliver from their first allocation. The lengthy delay in their delivery indicates that complexity, commerciality and market factors can lead to significant delays in delivery. Whilst we support the identification of sites for renewal, caution is needed with respect to the delivery trajectory proposed for sites assumed to deliver in the first five years of the Plan. This will bolster Policy SA2 to ensure that it is justified and effective in terms of the Framework.

### **Policy SA5 (Strood Town Centre and Surrounds)**

Policy SA5 provides for the delivery of more than 1,000 homes in and around Strood Town Centre. We support the objectives and ambition for renewal at Strood, but are concerned that sites SNF8 and SNF41 (which have a combined capacity of 236 dwellings) are anticipated to deliver in the first part of the Plan period, despite having been allocated in the 2004 Medway Local Plan and appear to have no current formal planning application activity. Whilst we support the delivery of renewal sites, reliance on early delivery is not credible and caution is required if the Plan's overall housing trajectory relies on these sites. Given the uncertainty over deliverability of the sites, this Policy is not considered justified or effective.

### **Policy SA8 (Hoo St Werburgh and Chattenden)**

Policy SA8 allocates around 4,700 new homes and supporting facilities at the Hoo Peninsula. Our representations demonstrate that reliance on the early delivery of new homes is not credible.

The Hoo Peninsula is an intrinsically unsustainable location. The Council's submission for HIF support acknowledges that significant investment in infrastructure is required<sup>2</sup>.

*"Key infrastructure is needed to support viable housing development, access to jobs and foster demand for housing. Current plans and brownfield sites carry uncertainty and risk considering the range and scale of development need."*

*"The Council and government share an ambi[t]ion to deliver long lasting sustainable transport projects. Lesser investment would not allow the delivery of the blended model required to deliver our package of solutions."*

*"An 'invest once and invest well' model delivering strategically informed infrastructure, gives communities and developers confidence and clarity with a [t]imely coordinated delivery. Piecemeal s106 contributions cannot achieve this and would critically impact on viability and timing."*

*"Without funding, smaller, less viable sites across Medway, including marginal land will be considered. These areas will either need significant infrastructure investment [t]hemselves, which may not be viable or achieve planning permission within desired timescales"*

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<sup>2</sup> See document page 9 of the Freedom of Information request, available at [https://assets.publishing.service.gov.uk/media/63da7c4ed3bf7f252c957f95/RFI3964\\_-\\_Medway\\_HIF.pdf](https://assets.publishing.service.gov.uk/media/63da7c4ed3bf7f252c957f95/RFI3964_-_Medway_HIF.pdf)

The infrastructure requirements are extensive, with quoted costs set out in the Infrastructure Delivery Plan published alongside the Plan – the Council’s evidence confirms that “[d]evelopment on Hoo is significantly challenging” (Infrastructure Delivery Plan, paragraph 2.6.1).

Local services are deficient for the existing population (as referenced at paragraph 14.9.2 and 8.12.1) and will require early provision if sustainable travel choices are to be instilled. Policy S22 provides no clear basis for the timing of new services, and Policy SA8 simply identifies development floorspace without establishing phasing.

Public transport services are inadequate to serve existing communities and require substantial investment to deliver that. However, no certainty pertains to the upgrade of the Grain railway line, despite that being essential to establish sustainable travel patterns. Policy DM17 safeguards land but offers no greater certainty. Without rail improvements, reliance is placed on bus services although it is unclear whether that comprises conventional bus services (Infrastructure Delivery Plan, page 101) or Bus Rapid Transit (referenced in Policy S20, the Vision for Access and Movement in Medway). There are significant differences between the two, but no cost is included within the Infrastructure Delivery Plan for either.

The existing highway network is inadequate to serve development, with the wider network exhibiting significant congestion (paragraph 9.4.6). More than £13m of improvements are required to serve the Hoo Peninsula, with a further (at least) £50m required to improve the Four Elms Roundabout – which is the only main highway junction serving the Peninsula. However, coordination appears to be deferred (paragraph 9.2.11 refers).

The potential adverse impacts of development on designated European sites means that environmental mitigation of more than £22m is required.

It is not clear, however, how that infrastructure is to be coordinated. Policy S24 does not set out a coordination mechanism, with reliance seemingly placed on pooled s.106 contributions (paragraph 9.2.7). It is also not clear how the development as a whole is to be coordinated. Policy SA8 indicates that a Planning Framework will be prepared to inform planning applications, but no clarity is provided with respect to the preparation, approval or status of that document. It is therefore not clear how applications will, in fact, be guided by the Council.

Despite the uncertainty regarding the coordination and delivery of development, new dwellings are expected to be delivered within the first five years of the Plan period. We do not consider that to be justified by the evidence which demonstrates there to be considerable further work required to coordinate and deliver development. This Policy is therefore not justified or efficient in terms of the Framework.

### **Policy SA13 (Frindsbury Peninsula Opportunity Area)**

Policy SA13 provides for regeneration at the Frindsbury Peninsula, but recognises that as an opportunity which is challenging to achieve. Whilst 690 homes are identified as deliverable within the Plan period, it is not clear what the overall capacity of the area is. It is also unclear how and where existing employment will be relocated. Whilst the Council identifies the potential for Kingsnorth to be a relocation area (paragraph 14.14.5), the Employment Land Needs Assessment indicates at paragraph 8.6 that the remote location offers challenges to employment creation. The complex landownership offers further challenges to the renewal of the area.

The Frindsbury Peninsula suffers from highway network congestion (14.14.2) – a common network which serves the Hoo Peninsula via Four Elms roundabout. The Infrastructure Delivery Plan does not identify specific highway improvements needed to serve the Frindsbury Peninsula, and so no certainty can be given that sufficient capacity exists to serve development. Other infrastructure, such as education, local

services and health are also not identified in the Infrastructure Delivery Plan. It is therefore unclear whether and how such provision will be made.

In that context, we do not consider the Policy to be effective, since it remains unclear whether development can and will be served by adequate infrastructure, or indeed that existing employment uses will cease.

AO/RU/HLM088

AUGUST 2025

# REIMAGINING HOLBOROUGH QUARRY

## Delivery Statement



PART OF HENRY BOOT





# 1. Purpose

In November 2024 we issued an updated Prospectus to Medway Council and to Tonbridge and Malling Council setting out our vision for Holborough Quarry. This Delivery Statement provides an update on our ongoing technical studies and demonstrates how the Site could be delivered. There are no barriers to development, and Hallam Land and the landowners are committed to realising this sustainable and exciting opportunity in the short-term. Holborough Quarry is available, suitable, and achievable.

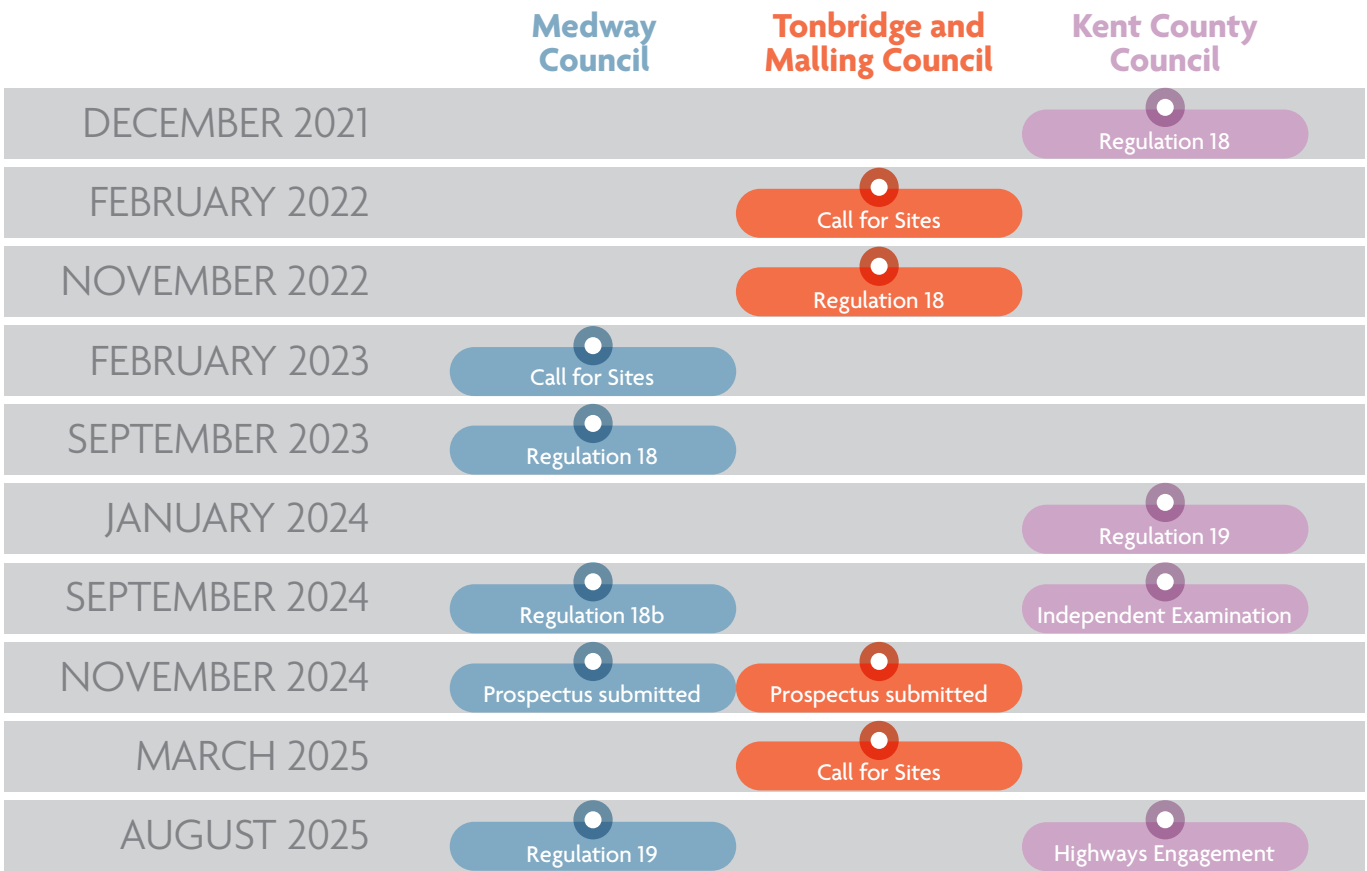
The Delivery Statement also contains a refreshed and updated Concept Master Plan informed by updated technical information. Our vision for the site expressed in the master plan will continue to evolve through the site promotion and planning process, and through further engagement with both Councils.



# 2. Context

The site remains under simple land control. Tarmac and Holcim UK control all land being promoted and operate under a collaboration agreement. A long term promotion agreement has been entered into with Hallam Land allowing developer market understanding and delivery expertise to be applied to the promotion. The site is available for development under the terms of paragraph 019 of Planning Policy Guidance.

This Delivery Strategy supports representations made against the Medway Local Plan Regulation 19 consultation. As with all materials prepared to date, it will be made available to both planning authorities, ensuring full and equal knowledge is available to inform both plan making processes, and to ensure that the authorities can engage with each other on a fully informed basis. We have continued to engage Kent County Council as minerals and highways authorities, updating them at key promotion stages.




Holborough Quarry has been promoted to both local plan authorities during their plan-making processes. Kent County Council’s Minerals and Waste Local Plan has been engaged, resulting in the deletion of the site’s safeguarding policy from the Adopted Kent Minerals and Waste Local Plan 2024-2039.

Hallam Land will continue to work collaboratively and positively on a cross-boundary basis, engaging both plan-making authorities and the minerals authority, and will be engaging with a range of stakeholders, including the local community, as the opportunity progresses.


# 3. Technical delivery updates

Ongoing technical and design reviews and discussions with the Councils have informed a refresh of the concept master plan. Key updates are presented using the themes set out in the November 2024 Prospectus.


LANDSCAPE



**ECOLOGY**  
Ecology does not constrain development. Walkovers in spring 2025 update the ecological baseline, confirming variable habitat quality including extensive areas of moderate to poor condition habitats. Existing site conditions provide an opportunity for enhancement, retaining higher quality habitats, and delivering in excess of 10% biodiversity net gain within the site boundary. Priority habits at the site are limited to a few locations with open mosaic restricted to worked parts of the site at Holborough Quarry and near Peter's Bridge roundabout. The landscape-led concept master plan retains the best quality habitats whilst providing for habitat enhancement through holistic Green Infrastructure.




**DRAINAGE**  
The site's hydrology is understood and does not impede development. Review of the site's hydrology indicates potential for surface water drainage via infiltration to the underlying chalk geology. Existing watercourses drain to water bodies within the site, and to the Medway river. The existing ditch across the north and middle of the site. At clay areas to the south there are opportunities for surface water to discharge into the existing network of lakes.



**SUDS**  
The site can be served by a sustainable drainage system offering hydrological and ecological benefits. Updated drainage capacity assessments have allowed SuDS to be revised for the concept master plan, with amendments to storage capacity and locations informed by the latest national SuDS guidance. An integrated network of multi-functional drainage features, incorporating permeable paving around homes, rain gardens, swales and wet/dry basins, enhancing ecology whilst providing amenity value.


MOVEMENT




Active travel connections will support ambitious modal shift targets. The Peter's Bridge roundabout, which was constructed as part of the extant cement works, provides access to the site. Highways modelling has shown that with upgrades on land either within the landowners control or adopted highway the junction will have capacity to accommodate trips from the development. Modelling is now underway to look at the wider network. Pedestrians and cyclists can make use of dedicated active travel routes along the old rail chord that passes underneath the Peters Bridge roundabout. Active travel crossings for pedestrians and cyclists can be achieved at-grade without overbridges, ensuring convenient and direct active travel routes to Halling, and Snodland, and to proposed LCWIP improvements in Tonbridge and Malling. We will engage with bus service operators to understand how extended or new services can service the site, connecting to Snodland, its HS1 station and other destinations.



EDUCATION




**PRIMARY SCHOOLS**  
Primary schooling can be delivered on site, supplementing capacity at the nearest existing primary school. Surplus capacity at Halling can serve initial phases of development in Medway, accessed by safe at-grade crossings from the site. Subsequent delivery of the site's northern primary school is capable of meeting additional needs arising from the development. The location of the primary school at the south of the site has moved slightly in response to updated easements information associated with existing utilities in this location but still delivers a graduated edge from the new community to the countryside.



**SECONDARY SCHOOL STRATEGY**  
The site will deliver capacity improvements to support the existing Holmesdale secondary school. Following discussions with the councils it is no longer proposed to provide a new secondary school but rather deliver additional capacity and wider improvements to support the existing Holmesdale secondary school, benefitting new and existing residents. The scheme will provide active travel connections into Snodland.

BUILT FORM




**NEW SUPERMARKET**  
Stakeholders have expressed support for the early delivery of employment uses at the site's Peter's Bridge gateway. With existing demand and excellent site frontage, there is the opportunity for these facilities, including a potential supermarket, to be delivered earlier than if solely serving the development alone.



**UTILITIES**  
A clearer understanding of constraints and opportunities has been informed by direct engagement with statutory and other utility providers. Up-to-date guidance on easements demonstrates that the site can be delivered without adverse impacts on the existing network, with preliminary capacity assessment advising that capacity enhancement are capable of meeting new demand. The Concept Master Plan update reflects the latest understanding of utility easements.

SUSTAINABILITY AND ENERGY

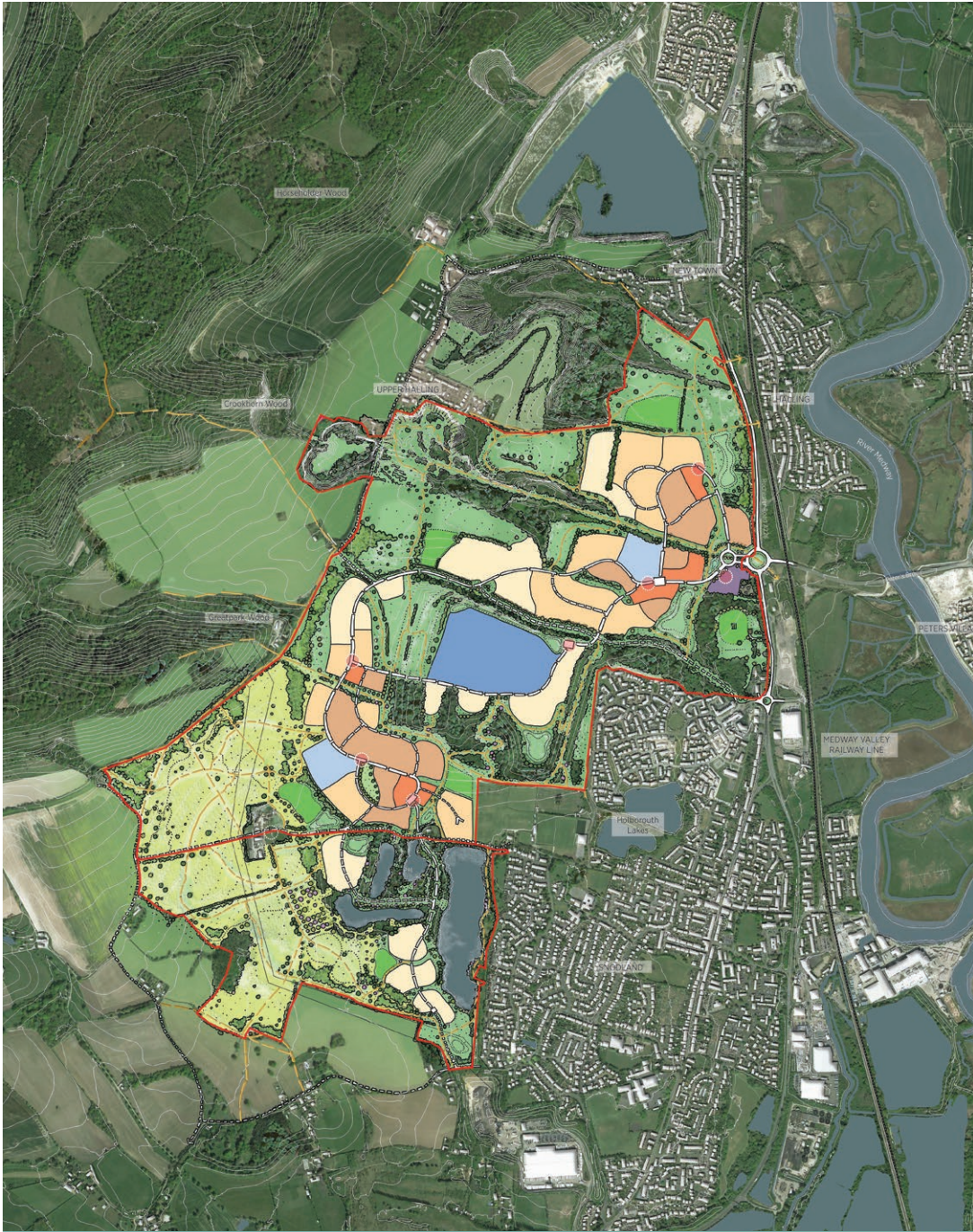


The site can meet emerging local and national sustainability standards due to it's scale and location. The proximity to existing services, including public transport, as well as the ability to deliver new services meeting day-to-day needs ensures that travel can be achieved sustainably. Retention of existing landscape elements, the protection of valued habitats and enhancements of others, as well as the provision of SuDS and new open spaces ensures that environmental sustainability can be achieved.

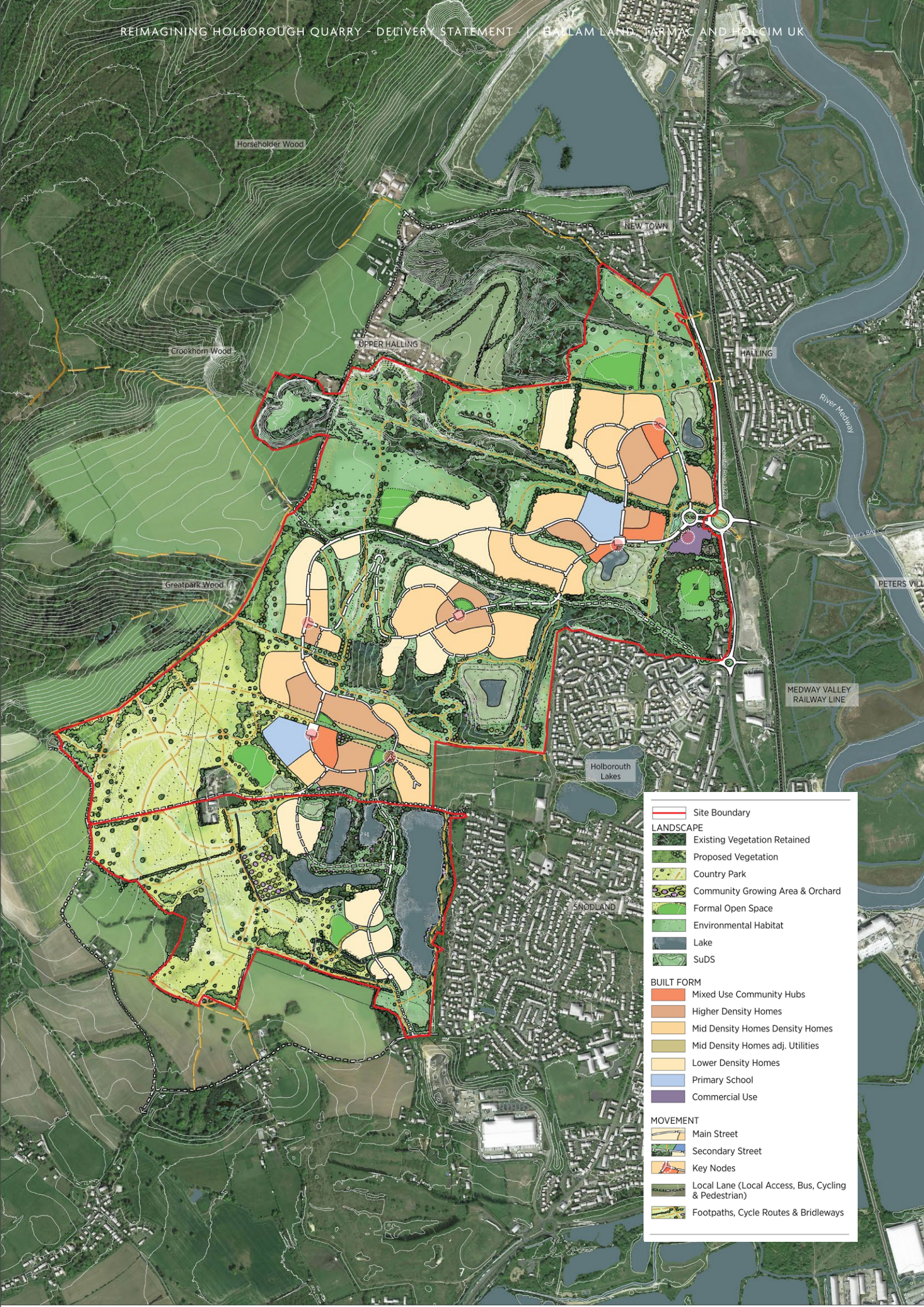


# 4. Introducing the Revised Concept Master Plan

In responding to the updated technical information described in Section 3 (above) the refreshed Concept Plan now provides around 3,800 homes that will help to meet the growth needs of both Tonbridge and Malling and Medway in a highly sustainable and accessible location.



Previous Concept Master Plan (November 2024)



- Site Boundary
- LANDSCAPE
  - Existing Vegetation Retained
  - Proposed Vegetation
  - Country Park
  - Community Growing Area & Orchard
  - Formal Open Space
  - Environmental Habitat
  - Lake
  - SuDS
- BUILT FORM
  - Mixed Use Community Hubs
  - Higher Density Homes
  - Mid Density Homes Density Homes
  - Mid Density Homes adj. Utilities
  - Lower Density Homes
  - Primary School
  - Commercial Use
- MOVEMENT
  - Main Street
  - Secondary Street
  - Key Nodes
  - Local Lane (Local Access, Bus, Cycling & Pedestrian)
  - Footpaths, Cycle Routes & Bridleways



# 5. Concept Master Plan updates

1

Sustainable Drainage System (SuDS) basin retaining existing sections of hedgerow and associated mature trees alongside establishment of new parkland space integrating with Public Rights of Way connections which link the site to Halling and Upper Halling.

2

Update to incorporate an attractive green space, with integrated attenuation areas, at the mixed-use community hub near the sites main entrance.

3

Reconfigured movement corridors accessing the former quarry area to deliver gradients of no greater than 1 in 20 for ease of access.

4

Design approach review following removal of Secondary School to bring forwards a new community uniquely set within the diverse environment of the former quarry incorporating the dramatic backdrop of the northern edge, south facing, quarry cliffs and the gentler slopes to the south providing walking and cycling routes connecting to Whitedyke Road byway. A new SuDS basin provides opportunity for creating a sheltered diverse wetland habitat.

5

The refreshed Concept Master Plan responds to new information received from direct engagement with statutory and other utility providers. Specifically the spatial proposals now integrate the easement of an existing High Pressure Gas Main to create an east-west linear park linking habitats across the proposals whilst fronted by a range of built and unbuilt land uses. An edge of mid density housing of up to 40 dwellings per hectare (where associated with utilities easements) blends with adjoining mid density homes of up to 45dph. This review also includes the slight relocation of the southern primary school but retaining its important role in delivering a graduated edge from the new communities to the countryside, and also the reconfiguration of the proposed mixed use community hub to provide a focus associated with the school and linear park.

6

The existing ditch networks are now more clearly retained and enhanced by the refreshed concept master plan. These features lie within the proposed Country Park and link through the low density areas of new homes in green corridors connecting with the existing complex of Paddlesworth Lakes which have the potential for recreational use.

