

Model Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For official use
only)

Name of the Local Plan to which this
representation relates:

Medway Local Plan

Please return to Medway Council Planning Service by 11th August 2025

Email: planning.policy@medway.gov.uk or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal

Details*

** If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title		Mr
First Name		Jonathan
Last Name		Buckwell
Job Title (where relevant)		Director
Organisation (where relevant)	Option Two Development Ltd	DHA Planning
Address Line 1		Astral Towers
Line 2		Betts Way
Line 3		Crawley
Line 4		
Post Code		RH10 9XA
Telephone Number		
E-mail Address		

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

S9, DM5,
DM10,
DM6, T2

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound

Yes

No

Amendments
needed to policy
wording as set
out in cover
letter

4 (3) Complies with the
Duty to co-operate

Yes

X

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see covering letter setting out concerns with policy as worded

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

*Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Option Two Development control site FP11 and working with the Council in relation to its future development. Concerns raised with policy wording as drafted and other design policies.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For details of our data privacy policy please see:

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>



Planning Service
Medway Council
Gun Wharf
Chatham
Kent
ME4 4TR

Submitted via email to planning.policy@medway.gov.uk

Our ref: DHA/36376
11 August 2025

Dear Sir or Madam,

MEDWAY LOCAL PLAN REGULATION 19 CONSULTATION

We write on behalf of Option Two Development Limited in response to the Medway Regulation 19 Consultation. As part of this submission please find enclosed this covering letter, together with the completed Planning Inspectorate Model Representation Form.

Background

Medway Council are currently consulting on their Regulation 19 Draft Local Plan until 11th August 2025. This follows the Regulation 18 consultation which was undertaken in 2023 and 2024.

The Regulation 19 consultation now includes draft site allocations and associated policies. Following the close of the Regulation 19 public consultation period, the Draft Local Plan and representations will be submitted to the Planning Inspectorate for examination by an Inspector to be appointed by the Secretary of State. As such this is the final stage of consultation ahead of submission.

Option Two Development Limited have responded to the previous consultations and control the Former Grays of Chatham Site, which is included as an allocation under policy SA2 – site FP11 for circa 123 residential dwellings.

Site Context

The Site comprises the former Grays of Chatham car dealership at 1-33 (excluding 21) High Street, Chatham. A former used car centre which principally comprises a street-fronting office/showroom element, with warehousing to the rear, and a large area of hardstanding which continues to be used for the storage of cars. It is understood this is a sui generis use.

The Site sits between Chatham High Street to the south and the Medway River to the north. The Site is flanked to the east and west by varied built form including warehousing and commercial units. Immediately to the western boundary of the Site is the Grade II listed Hospital of Sir John Hawkins and Attached Front Railings. To the eastern boundary of the Site is the Grade II listed 35 Chatham High Street. In the centre of and surrounded by the

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Site, on the southern boundary to Chatham High Street sits a former public house, now a fast food takeaway, and a small former industrial warehouse which sits centrally within the Site, and has been extended to the east.

Planning application 21/0429 was submitted to the Council in 2022 and is currently pending. This application seeks full planning permission for the demolition of existing buildings and redevelopment of Site for a residential-led mixed-use development including residential dwellings and class E uses in buildings, together with associated accesses, car and cycle parking, bin stores, landscaping and amenity space, and a river walk.

Policy SA2 Heritage-led Sites

In terms of the Council's vision for Chatham, the Spatial Strategy states: *"Chatham is an important focus for much of the urban regeneration, with development proposed in the centre of Chatham; and on waterfront sites, and in adjacent areas to the centre, such as Chatham Intra and the station gateway. The strategy is informed by the Chatham Design Code and the Chatham Intra Heritage Action Zone (HAZ) development framework to provide for new homes, workspaces, retail, leisure and community facilities. Chatham will provide the primary centre function for Medway, benefitting from its sustainable transport links and additional investment in cultural and community infrastructure."*

Policy S9: Star Hill to Sun Pier states *"The Star Hill to Sun Pier Development Framework includes the Star Hill to Sun Pier Conservation Area and is designated as a Heritage Action Zone. The Star Hill to Sun Pier Development Framework aims at re-establishing the area as a social, cultural and dynamic destination whilst preserving and enhancing the special historic interest and character of the neighbourhood. Planning applications will be supported where compliant with the Supplementary Planning document adopted in 2024."*

Policy SA2 allocates the site for circa 123 residential dwellings and sets out the site-specific criteria for this Site. The preamble to policy SA2 Heritage-led Sites states development on the Interface Land is guided by the Chatham Interface Land Supplementary Planning Document (2018). Medway Council has more recently adopted a Star Hill to Sun Pier Development Framework (2024), which received funding for the Heritage Action Zone.

The Interface Land SPD remains relevant and provides flexibility to respond to the market. As such, the opportunity to deliver housing as part of mixed use schemes should be explored. Proposals will need to ensure that all relevant bodies are consulted to ensure appropriateness in this location.

The Star Hill to Sun Pier Development Framework provides appropriate guidance within a conservation area and is supported by Historic England. This guidance also plays a key role in linking two of Medway's historic centres, Rochester and Chatham, calling for the celebration of Medway's heritage. The southern end of this defined area together with the Chatham Design Code provides a seamless transition into Chatham, which also seeks to enhance the waterfront area, activate space and create an environment suitable to support a sustainable and desirable quality of life for future and current residents

The policy states:

Policy SA2: Heritage-led Sites Objective

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1. *Medway is rich in heritage and prides itself in protecting, celebrating and enhancing this. Two strategic heritage led site allocations will provide an opportunity to sensitively deliver on housing targets whilst respecting its heritage context, i.e. Interface land and Star Hill to Sun Pier. Development proposals will be guided by the following:*

Criteria

2. *Interface Land:*
 - a. *Combined site areas: 5.3 ha*
 - b. *Combined site capacity: Circa 150 new homes as part of a mixed use development*
 - c. *Both sites are within the setting of a number of scheduled monuments and Dockyard buildings and also contain undesignated archaeology. Mixed use schemes must respond positively to the historic and locational context and be compliant with the Interface Land Supplementary Planning document (SPD)*
 - d. *Development will need to be compliant with relevant Local Plan policies including but not limited to heritage DM10 and S8, housing mix T2, affordable housing T3, design T1, DM5, DM6 and S14*
 - e. *Development should seek to reinforce the historic character of the northern end of the Dockyard, currently the focus of timber management associated with the construction of ships.*
3. *Star Hill to Sun Pier:*
 - a) *Combined site areas: 3.68 ha*
 - b) *Combined site capacity: circa 474 new homes*
 - c) *Development will need to be compliant with the Star Hill to Sun Pier Development Framework, relevant Conservation Area Appraisal and Management plan and relevant Local Plan policies including but not limited to S9, S8, DM10.*
 - d) *The historic setting and context will be appropriately addressed:*
 - i. *Proposals on site FP1 should seek to retain and reuse existing historic buildings and where possible reinforce and reveal areas of now lost historic landscape.*
 - ii. *Development on site FP11 should reinforce and reveal the special historic character of the conservation area, avoiding taller and bulky built forms.*
4. *Proposals should, in demonstrating compliance with policy S1, explore the potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, to minimise embodied carbon emissions.*

Subsequent design principles

5. *Archaeological desk-based assessment and evaluation will be required where necessary to inform detailed proposals alongside planning applications.*
6. *Compliance with Interface Land SPD*
7. *Compliance with relevant Conservation Area Appraisals and Management Plans*
8. *Compliance with Star Hill to Sun Pier Development Framework*



Site FP11 Grays Garage High Street is identified for residential led development, circa 123 units and in the plan period years 1-5.

Whilst Option Two Development Ltd strongly support the inclusion of the Site, they have concerns with the suggested quantum of development and specific wording of the policy.

Site FP11 is allocated for circa 123 residential dwellings. The Land Availability Assessment which is submitted as part of the evidence base states for this Site, the proposed uses are a minimum of 158 residential dwellings and Class E uses.

Over time, and during the life of planning application 21/0429 – there have been a lot of discussions with the Council with regards to the quantum of development and viability. Whilst we have considered whether a small development could be viable, it is clear that a minimum of 158 dwellings is required.

Medway Council must ensure there are sufficient deliverable sites, where development potential has been optimised, to meet identified housing needs over the plan period. This will make the Plan effective in meeting its objectives and provide flexibility should other elements of the Council's housing land supply be delayed, whilst also ensuring the most effective use of land. As such, whilst the wording of the policy allows some flexibility stating 'circa' – to optimise the development potential of the site and ensure a viable scheme can be delivered, we recommend that the allocation quantum for Site FP11 be increased to circa 158 dwellings.

Criteria 3c requires development to be compliant with the Star Hill to Sun Pier Development Framework, relevant Conservation Area Appraisal and Management Plan and relevant Local Plan policies including but not limited to S9, S8 and DM10.

We have previously responded to both the Development Framework SPD and Conservation Area Appraisal. Whilst Option Two Development Ltd welcome the overall concept of the SPD, the general concern was that in places the SPD was overly prescriptive.

Criteria 3di states Development on site FP11 should reinforce and reveal the special historic character of the conservation area, avoiding taller and bulky built forms.

The wording of this is too vague and there is no definition of taller or bulky built forms. This could be read as very restrictive, which could potentially stifle creative design solutions and prevent regeneration of the Site by making development unviable. In order to achieve the development potential/allocation requirements on Site and create a strong design solution, buildings need to be taller than those surrounding the Site. Furthermore, given the other design policies in the Local Plan; policies S8, S9, DM5, DM10 and the SPD, we recommend that the reference to taller and bulky be removed from policy SA2 to avoid any confusion.

Criteria 4 states *Proposals should, in demonstrating compliance with policy S1, explore the potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, to minimise embodied carbon emissions.*

Policy S1 relates to planning for climate change. In this case, the quality of the existing buildings on the Site is relatively poor, some of which are in poor structural condition and

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the horizontal 1930s frontage to the High Street is incongruent with the traditional fine-grain, linear development. A comprehensive redevelopment on this Site is required – with new buildings which can incorporate sustainable features, rather than an adhoc redevelopment seeking to retain some buildings on Site in order to minimise carbon emissions. As such we suggest the wording be amended to add the wording in red: *Proposals should, in demonstrating compliance with policy S1, **where appropriate** explore the potential to re-use or renovate existing buildings rather than demolishing and rebuilding them, to minimise embodied carbon emissions.*

Other Policies

Policy S9 - Star Hill to Sun Pier

The policy states planning applications will be supported where compliant with the Supplementary Planning document adopted in 2024. As noted, we have previously commented on the Development Framework and wish to reiterate that the SPD is a guide to development.

Policy DM5 - Housing Design

No objection in principle, however the requirement for “dementia friendly standards” is not specific and is already included in Policy T4 in relation to specialist / supported housing rather than general housing design. Furthermore, Part M of Building Regulations covers accessibility. As such we suggest this be removed from the policy.

Policy DM10 – Conservation Areas

The policy states development within or affecting the setting of a Conservation Area will be encouraged where it contributes positively to the conservation and enhancement of the character, appearance and distinctiveness of the area. It goes on to state that any proposals for development within a Conservation Area must demonstrate that they... *‘Retain historical and architectural features of the area’* (bullet point 4).

As discussed through previous consultations and the planning application process - the majority of buildings on Site relate to the former Grays car centre, and warehousing for the storage of cars. Within the centre of the Site is a 19th/ 20th century warehouse. It is considered to be a warehouse of typical of a late 19th/early 20th century wharf-side structure, possessing no particular architectural interest. The warehouse is not listed but has some limited historical interest as a remnant of Chatham’s riverside industry. A structural survey has been carried out which found that the warehouse is in a poor structural condition, having suffered major structural downward movement, with further movement, if not collapse, inevitable in due course. Its demolition enables the comprehensive redevelopment of the Site, and the retention of the warehouse is not a viable option.

Policy DM9 (Heritage Assets) addresses the demolition or loss of heritage assets and the currently adopted planning policy for demolition in Conservation Areas – Policy BNE13 acknowledges that there are exceptions and allows for demolition. It states: *Demolition of buildings which make a positive contribution to the character or appearance of a Conservation Area is not permitted except in specific circumstances. These include where:*

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- *The building is wholly beyond repair;*
- *It is incapable of use;*
- *Its design is inappropriate; or*
- *The character and appearance of the Conservation Area would be enhanced by its removal and replacement.*

As currently worded policy DM10 is too restrictive, it requires the retention of any historical and architectural features on sites, with no exceptions listed – therefore it could potentially restrict comprehensive redesign solutions on this Site and others – and restrict development so much, that it is unviable to bring forward.

We therefore recommend that bullet 4 of policy DM10 be amended to add the following wording in red *Retain historical and architectural features of the area that make a positive contribution to the character or appearance of the Conservation Area, unless there are specific circumstances that justify removal such as that:*

- *The building/feature is beyond repair;*
- *It is incapable of use;*
- *Its design is inappropriate; or*
- *The character and appearance of the Conservation Area would be enhanced by its removal and replacement.*

Policy DM6 – Sustainable Design and Construction

No objection in principle. Bullet point 3 requires the provision of green walls/roofs – however these are not always appropriate for all forms of development. As such we suggest the wording be amended to add the wording in red, *the use of natural features such as green walls/roofs/hedges/roof top gardens etc where appropriate to enhance sustainability and Biodiversity Net Gain and contribute to the health and wellbeing of residents.*

Bullet point 6 states *details of how the proposal is seeking to address the climate emergency with an aim to achieve or aspire to net zero carbon with due regard to Medway's current Climate Action Plan and Medway Council Corporate Strategies. The whole life cycle of a building should be considered. Where possible proposals for conversion or reuse of buildings will be favoured.* This is already covered by Policy S1 and is also now superseded by Building Regulations. As such suggest this be deleted and not repeated.

Bullet points 7 and 8 state:

- *that the inclusion within any planning application, details how the proposals will address matters of sustainability through the design, construction and operation phases via design considerations and submission of a construction management plan.*



- *creation of a safe environment including but not limited to during the operational phase of the development but also ensures full remediation of brownfield sites to appropriate standards for re-use.*

The submission of a Construction Management Plan at the planning application stage is difficult as not all of this information will be known yet. Furthermore, full remediation details would follow at the condition stage, following further contamination work. As such we recommend that these bullet points be removed.

Policy T2: Housing Mix

No objection in principle, however paragraph 6 states *Development schemes must demonstrate that as part of the housing mix, sufficient consideration has been given to: older persons housing need, (particularly for downsizing); custom and self-build plots.*

Policy T9 covers self-build and custom housing and is clear that no provision will be sought on flatted developments.

To avoid confusion, suggest reference to custom and self-build plots be removed from paragraph 6 and dealt with under policy T9.

Policy S14: Supporting Medway's culture and creative industries

Policy S14 encourages new creative uses and cultural venues and/or facilities and spaces for outdoor cultural events. It states at bullet point 6 that major development proposals, subject to viability, must include public art that enhances the cultural offer and appearance of the development and its surroundings. Public art is broadly defined as artwork that is freely accessible to the public, incorporated into public spaces. The policy acknowledges that the provision of public art is subject to viability – as such we recommend that bullet point 6 be amended and add the following wording in red: *major development proposals, subject to viability, must include public art or equivalent cultural contributions towards public realm or river walks that enhances the cultural offer and appearance of the development and its surroundings.*

Summary

Option Two Development strongly supports the vision for regenerating Chatham and the inclusion of this Site at policy SA2. Option Two Development continues to work with the Council in relation to the redevelopment of this Site and reiterates the Site is a deliverable Site – available, is suitable for development and deliverable in the short term i.e. first 5 years of the new Plan Period.

I trust the above comments / suggested amendments are considered and await confirmation of receipt of our representations in due course. Please do not hesitate to contact me should you wish to discuss any matters.

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Yours faithfully,



Jonathan Buckwell
Director

Kent

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London



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Model Representation Form for Local Plans

	<p>Local Plan Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

Medway Local Plan

Please return to Medway Council Planning Service by 11th August 2025

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Miss	
First Name	Rosanna	
Last Name	Tunnadine	
Job Title (where relevant)	Policy and Public Affairs Officer	
Organisation (where relevant)	Habinteg Housing Association	
Address Line 1	132 Wakefield Road	
Line 2	Drighlington	
Line 3	West Yorkshire	
Line 4		
Post Code	BD11 1DR	
Telephone Number		

E-mail Address
(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation: Habinteg Housing Association

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="x"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

As an expert housing provider, we welcome the opportunity to comment on the development of the Medway local plan. Habinteg is a housing association that champions inclusion by providing and promoting accessible homes and neighbourhoods that welcome and include everyone. With over 50 years' experience in housing and disability, we manage over 3300 accessible properties across England. We believe that people are disabled by barriers in society and negative public attitudes, rather than by their own impairments.

Habinteg strongly recommends that the local plan includes accessibility design standards, specifically Building Regulations M4(2) and M4(3).

M4(2) is essential for delivering inclusive, future-proof homes that support ageing in place and any adaptations that may be required over the lifetime of the home. This standard meets the needs of a wide range of residents, including older people and many disabled people. Hence, we recommend that **100%/ all new homes are built to the M4(2) standard.**

M4(3) standard homes are designed with the long term needs of wheelchair users in mind. These must be prioritised on any local plan to address the critical shortage of wheelchair-accessible housing. Hence, we recommend that **10% of new homes are built to the M4(3) standard.**

As it stands, the Medway local plan does not go far enough to provide legal protections for older people and wheelchair users, falling short of the standards set by the Equality Act 2010.

Planning inspectors have an obligation to give due regard to the Public Sector Equality Duty (PSED) when exercising their functions. This encompasses a requirement to give due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010. Planning teams, as they perform a public sector role, have an obligation to give 'due regard' to the Public Sector Equality Duty (PSED) when exercising their functions. This encompasses a requirement to give due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010.

This obligation is further supported by international human rights law: the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), which the UK has ratified, reinforces in Article 28 the right of disabled people to an adequate standard of living and social protection.

By omitting a policy that sets an expectation for a proportion of new homes to be delivered to either M4(2) or M4(3) homes, we believe that disabled and older people may be left without access to suitable new-build homes in Medway, which may amount to indirect discrimination.

By taking swift action to ensure all new homes built in Medway have a Part M standard target, the council could improve health and wellbeing outcomes for its ageing population and support better community and economic participation among older and disabled people.

Such amendments to the local plan would enhance protections for older and disabled individuals, thereby reinforcing compliance with the Equality Act 2010. In doing so, it would better satisfy the legal obligation to eliminate discrimination and advance equality of opportunity under the PSED.

Habinteg recommends that all new homes meet Building Regulations M4(2) accessible and adaptable standard as a minimum - to increase the proportion of homes in Medway that are capable of meeting the changing needs of disabled and older people. This approach not only supports inclusive communities but also reduces long-term costs which may otherwise fall to the local authority, for example, stairlift installation in an M4(2) home costs significantly less (£2,500–£4,000) than in a home built before the standards came into effect (£9,000–£10,000).

Wheelchair accessible accommodation generates significant social and economic value – by reducing reliance on social care, minimising accidents in the home and maximising the potential for disabled people to be economically active and take up employment. The value of the range of benefits offered by wheelchair accessible properties was enumerated in Habinteg's 2023 report with London School of Economics: Living not Existing. The long-term economic benefits outlined in the report underline the case for adopting a specific target of at least 10% wheelchair user homes in all new developments, strengthening the soundness and sustainability of Medway's local plan.

The benefits of M4(3) homes are plentiful, and amongst them, new homes that meet category M4(3) will deliver:

- For a working age wheelchair user, the benefit of living in a wheelchair user home can be valued at around £94,000 over a 10 year period.
- For a later years wheelchair user household (aged 65 and over), the benefit could be around £100,000 over a 10 year period.
- For a household with a child who is a wheelchair user, the benefit of living in a suitable wheelchair user home could be around £67,000 over a 10 year period.

The contributing factors to these figures include that a wheelchair accessible home:

- Removes or reduces the cost of care assistance in the home
- Improves confidence, independence, and self esteem
- Enables greater social inclusion and community participation
- Reduces trips and falls in the home
- Increases economic participation – disabled people of working age who have their access needs met at home are four times more likely to be in employment.

The 2021 census showed that 19.4% of people in Medway identified as being disabled and the regulation 19 document identified a 26% growth in the over 65 population.

We believe a defined percentage of new homes (10% as a starting point) should be specified to M4(3) standards in order to meet the current and future needs of the population of wheelchair users. Moreover, mandating for 100% or all other (non-M4(3) homes to meet the M4(2) standards offers older people a better choice of accommodation to suit their changing needs helping them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.

The local plan could also help address disabled people's housing needs by requiring planning teams to track the number of homes given planning permission to one or other of the higher level accessibility standards. This will help to establish and track delivery which in turn will assist future strategic planning.

Accessibility requirements should not be limited to specialist or affordable housing.

The need for and potential to benefit from access features is not restricted to the occupants of one type of tenure. Impairments that lead to disability can emerge in any household at any time and nationally we have an ageing population which drives an increasing incidence of age-related disability. M4(2) features benefit everyone by enabling people to remain in their homes longer, supporting families to have healthy, active lives, and improving overall housing quality. M4(3) features may be equally as relevant to the private housing market as the social sector (although disabled people as a demographic group tend to be disproportionately represented within the social sector). Analysis of DFG expenditure shows that the majority of funding is spent adapting homes in the private ownership sector.

Therefore, embedding these standards across all tenures, market and affordable, and house types is vital to creating inclusive, adaptable communities that meet current and future needs.

Habinteg supports the principle that housing should enable older people to live independently for longer. As highlighted in the regulation 19 document, Medway has an older population that is projected to grow by 26.2% by 2041. To meet this demographic shift, we believe all new homes should be built to the M4(2) standard as a minimum, ensuring greater independence, choice, and long-term suitability for residents as they age.

The benefits of M4(2) homes are well understood and have been highlighted by a range of parliamentary and government commissioned inquiries, including the recent Older People's Housing Task Force and the MHCLG inquiry into Disabled people in the housing sector. Among the benefits noted are

- faster hospital discharges
- less costly and speedier adaptations when required
- reduced local government expenditure on domiciliary care packages by supporting individual independence within the home
- delayed or avoided moves to more expensive residential care settings
- providing a better environment for ongoing independence when needs change.

Dwelling mix and quality for older people

Considering the wide range of needs experienced by older people the Authority should ensure that the local plan stipulates a proportion of older persons housing, where newly developed, to be designed to fully wheelchair accessible standard.

Habinteg also recommends referring would be developers to the recently published 'Inclusive Housing Design Guide' which shows how going beyond the requirements of building regulations can produce even higher quality results that includes consideration of the needs of people with sensory or cognitive impairments and neurodiverse people.

Location and context of developments

Disabled and older people have told Habinteg about the frustrations and limitations of living in a neighbourhood that offers poor accessibility. This can reduce the benefits gained from having an accessible home. Factors such as the accessibility of transport provision (not just location), the street scape, provision of drop kerbs, pavement parking rules and the accessibility of local shops and amenities are all important to providing places that are truly liveable which enable people participate in their local community.

Consideration should therefore be given in the local plan as to how the Authority wishes to emphasise the importance of accessibility of the local neighbourhood for any new development, not just proximity.

Recommended reading:

1. [Living not Existing: the social and economic value of wheelchair accessible homes, Habinteg & LSE 2023](#)

(Continue on a separate sheet /expand box if necessary)

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Habinteg strongly recommends that the local plan includes accessibility design standards, specifically Building Regulations M4(2) and M4(3).

M4(2) is essential for delivering inclusive, future-proof homes that support ageing in place and any adaptations that may be required over the lifetime of the home. This standard meets the needs of a wide range of residents, including older people and many disabled people. Hence, we recommend that **100%/ all new homes are built to the M4(2) standard.**

M4(3) standard homes are designed with the long term needs of wheelchair users in mind. These must be prioritised on any local plan to address the critical shortage of wheelchair-accessible housing. Hence, we recommend that **10% of new homes are built to the M4(3) standard.**

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

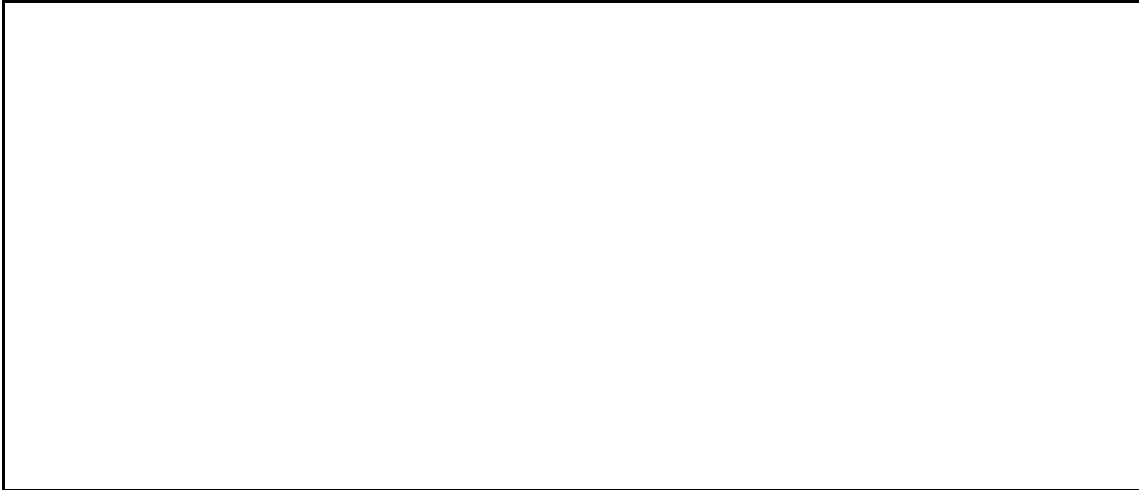
x

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:



Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For details of our data privacy policy please see:

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>



Medway Local Plan

Response to Regulation 19 Draft

On behalf of

Peel Waters

August 2025

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Appendices

Appendix 1: JMA Medway Waterfront Regeneration Document
(bound separately)

1. Overview

- 1.1. These representations are submitted on behalf of Peel Waters, which has significant brownfield land interests in Medway, comprising:
 - Chatham Waters – a mixed use development on part of the former Chatham Docks Industrial Estate to the east of Basin 3 and immediately south of the lock gates. Planning permission was granted in 2013 for a large mixed use development including flood defences and major new road junction (designed to accommodate the development and future development on the wider land holding). The approved scheme enabled critical refurbishment of the former naval lock gates, necessary to ensure the ongoing operation of the port until expiry of the existing tenant leases. It also secured permission for 950 homes. To date, over 600 homes have been completed, along with new public realm, retail, leisure and education uses. Once construction of the care home has completed in summer 2026, almost £200m will have been invested in Chatham Waters.
 - Basin3 – a 7Ha employment site immediately south of the Basin with outline permission for up to 31,000m² of employment space.
 - The balance of Chatham Docks Industrial Estate, comprising circa 23Ha of land to the north of the Basin and adjacent to the existing residential area of St Mary's Island.
 - The Chatham Line, a disused rail line linking Chatham Waters to Gillingham Town Centre.
- 1.2. These land holdings have potential for significant further regeneration and are allocated in the emerging Local Plan as site SM16, the development of which will help to transform the river frontage with a mix of uses including the potential to deliver an additional 2,200 homes and 31,000m² of employment space over the plan period and more homes (circa 800) beyond – in addition to the remaining 300 homes pursuant to the existing consent at Chatham Waters.
- 1.3. This potential has previously been set out through submissions and representations to various 'call for sites' documents and at the earlier Regulation 18 stages of the Medway Local Plan over many years.

- 1.4. As the Plan has advanced, the potential development of the site evolved, through consultation and engagement, underpinned by technical input to ensure all site constraints are clearly understood and will not present barriers to delivery.
- 1.5. These representations include an updated 'Medway Waterfront Regeneration' document (**Appendix 1** bound separately) which articulates how the overall number of homes and mix of development now proposed can readily be accommodated across the site, integrating and linking with its surrounding uses.

Support for the Medway Local Plan

- 1.6. Overall, Peel Waters supports the draft Plan, which it believes is sound, having been positively prepared, justified and will be effective.
- 1.7. Peel Waters' proposals, to continue regenerating the former industrial estate at the docks, closely aligns with the overall vision and strategic objectives and, through these submissions, looks to highlight the extent of the potential there is to deliver high quality sustainable development and place making, set around new and extensive public realm and open spaces that benefit from the riverfront and waterside location.
- 1.8. Our comments therefore primarily relate to points of detail or suggested amendments, for example, where we consider the Plan might not adequately grasp the extent of the overall riverside regeneration potential.
- 1.9. Peel Waters very much sees the potential of SM16 along with the other riverside sites as transformative. There is the opportunity to introduce a riverside walk and other links through the site, connecting established communities and providing public access for the first time in its history.
- 1.10. The maritime history will be showcased and the waterfront activated with the exciting potential to become a leisure destination for all Medway residents and visitors.
- 1.11. The proposed green link, re-purposing the former dock railway line, has the potential to benefit a much wider area, establishing a sustainable pedestrian and cycle corridor for all residents and employees along the river frontage, the adjacent universities and helping connect surrounding communities.
- 1.12. We look forward to discussing the proposals at the Examination stage of the Plan and reserve our position in terms of making any further comments on subsequent drafts and the wider evidence base in the lead up to the Examination in Public.

2. Vision and Strategic Objectives

- 2.1. The enclosed JMA Medway Waterfront Regeneration document sets out how the proposed development at site SM16 will align with and help the Council achieve its vision for Medway in 2041. It identifies the extent of the proposition which comprises significant inward investment (exceeding £1Bn) to re-purpose and regenerate such a large previously developed waterfront site. The overall site can deliver sustainable development that will:
- Introduce flood defences to mitigate climate change
 - Connect existing communities with new riverside and waterfront links and green spaces
 - Help meet overall housing needs with 500 more homes on Chatham Waters and 2,500 on Chatham Docks Industrial Estate
 - Deliver a mix of other uses to support local services including supporting retail, bars & restaurants and community uses
 - Activate the waterfront with new public realm that will showcase the historic dock
 - Deliver major new employment space to meet future requirements immediately adjacent to the Medway universities
 - Help improve accessibility through promoting a new green link to Gillingham
- 2.2. The JMA document helps to articulate the scale and nature of the proposed development that has potential to deliver new homes and employment opportunities at scale, providing a sustainable place in which to live and/or work.
- 2.3. Although illustrative, the emerging masterplan has been informed by further technical due diligence which has considered possible site constraints including relating to air quality, townscape and visual impact, flood risk, ground conditions, built heritage and archaeology (details of which can be submitted if required).
- 2.4. This work has identified no undue constraints that would inhibit the delivery of the proposed development. The townscape and visual impact assessment identifies the need for good quality, functional public realm of an appropriate

scale to mitigate the effects of high-density development, with potential for taller building heights in key locations. The heritage and archaeology work indicates that archaeological potential is generally low due to past development, although some alluvial deposits could be affected by intrusive works. The site makes only a limited contribution to the setting of nearby listed buildings, conservation areas, or scheduled monuments.

- 2.5. Activating the waterfront and replacing the former industrial uses will improve air quality and provide a valuable new leisure resource for all Medway residents and visitors, helping to support people to lead healthier lives and strengthening communities, in line with the overall Council vision and strategic objectives.
- 2.6. Overall, site SM16 provides an exciting opportunity for high quality place making that can build in resilience to climate change and deliver significant benefits for future residents and visitors, enhancing health and wellbeing.

3. Spatial Development Strategy

- 3.1. Peel Waters supports the Council's spatial development strategy, which looks to unlock the potential of previously developed land as part of the wider riverside regeneration area. Maximising the potential of these areas, which lie relatively close to existing services in the urban centres, will reduce the need for less sustainable development on greenfield land in more remote parts of the borough.
- 3.2. As set out in the attached JMA Medway Waterfront Regeneration document, the proposed development at SM16 sits at the heart of this approach, promoting sustainable growth.
- 3.3. Peel Waters will invest to re-purpose and make the best use of this previously developed land along the urban waterfront that will deliver a resilient and attractive environment in line with the Council's spatial development strategy.
- 3.4. Through providing a finer grain of development and introducing green corridors and other waterside public realm, the proposals will attract people in and through the site for the first time, linking existing communities on St Mary's Island with Chatham Waters and the riverside to the east, and with the universities to the south.
- 3.5. Peel Waters also supports the delivery of a sustainable travel link to Gillingham town centre along the former dock railway line, that has potential to significantly benefit the communities, businesses and universities along the river front and the adjacent communities immediately to the north of Gillingham town centre.
- 3.6. The proposed regeneration at site SM16 has been promoted through previous drafts and calls for sites since 2008. In 2013, permission was granted for Chatham Waters, which enabled a £7m investment in the refurbishment of the original naval lock gate caissons, to keep them operational until the existing tenant leases expire. The wider site should then become available for development once the Local Plan has been adopted, and planning permission granted.

4. Detailed Comments

- 4.1. Having briefly summarised the support Peel Waters has for the draft Plan including its overall vision, strategic objectives and spatial development strategy, the following paragraphs set out our more specific comments on relevant paragraphs and policies in the draft Plan.

Policy T2 Housing Mix

- 4.2. Peel Waters is supportive of delivering an appropriate housing mix but, on higher density urban regeneration sites, does not accept that this mix *must* include bungalows (as currently drafted) which, by their nature, have a far lower density that the riverside waterfront is seeking to deliver.
- 4.3. For the same reasons, it is unlikely that higher density sites will be suitable for custom and self-build plots.

Policy T3 Affordable Housing

- 4.4. As drafted, the policy doesn't define or identify the lower or higher value areas, where the different percentage proportion of affordable housing is to be applied, subject to viability testing. This should be clarified.

Policy T9 Self Build and Custom Housebuilding

- 4.5. Peel Waters agrees that this policy should not apply to '*predominantly flatted developments*' but suggests that this should be more clearly set out or defined in the policy wording.

Policy S14 Supporting Medway's Culture and Creative Industries

- 4.6. Peel Waters supports this policy which recognises the potential for Chatham Docks (amongst other locations) to incorporate cultural facilities, venues and event spaces to help regeneration and to activate spaces.

Policy DM 12 Local Centres

- 4.7. Peel Waters agrees with the hierarchy of centres (S16) and requests that the allocated centre LC 18 at Chatham Waters is amended to incorporate the existing and proposed commercial and retail and community spaces adjacent to the east and north sides of the Dock at Chatham Waters and within the illustrative JMA Masterplan enclosed with this representation. This could be reflected within one extended Local Centre or two separate designations, to help serve the growing residential and business communities planned.

Policy DM14 Dockside

- 4.8. The future of Basin 3 (the large eastern dock) once the commercial port is decommissioned could well support additional water-based leisure activities and so the leisure allocation on the proposal map relating to Basin 1 and 2 could reasonably be extended to encompass Basin 3 to demonstrate the Council's support for other leisure-based activity as a part of the wider development mix at SM16.

Policy DM15 Monitoring and Managing Development

- 4.9. As set out in paragraph 1.1 above, the existing Pier Road gyratory was funded by the development at Chatham Waters and was designed with capacity to accommodate the future development now proposed through allocation SM16.
- 4.10. As a result of wider cumulative impacts, the Strategic Transport Assessment has identified a need for a further upgrade towards the end of the Plan period that would introduce a major six arm gyratory at the site access point and for a significant cost.
- 4.11. Peel Waters questions the overall approach and principle of the scheme put forward and reserves its position to review and comment on the need for this further upgrade. Even if an improvement is required (which Peel Waters does not currently accept), Peel questions the design put forward, which currently appears to act as a significant barrier to pedestrian and cycle movements.
- 4.12. Having already provided a significant upgrade of this junction capable of accommodating the proposed development at SM16, Peel Waters is keen to avoid, if possible, any potentially unnecessary infrastructure that might add further financial burdens on the delivery of this challenging brownfield site.

Policy T20 Riverside Path

- 4.13. One of the key benefits of the regeneration and development at site SM16 is the ability to introduce a new riverside path, filling the gap between the existing residential uses on St Mary's Island and the Chatham Waters development caused by Chatham Docks Industrial Estate. This will be the first time in history that the public will be able to walk around the entirety of St Mary's Island.
- 4.14. It will further provide the opportunity for additional pedestrian and cycle links and for re-routing the King Charles III England Coast Path National Trail, which currently diverts around the Chatham Docks Industrial Estate along Pier Road. The JMA illustrative Masterplan attached show how this key strategic route could be diverted through the new development, providing a significantly enhanced route and major public benefit.

Policy DM16 Chatham Waters Line

- 4.15. Peel Waters supports this policy which safeguards the former dock railway corridor for a new active green route proposed to link the riverside regeneration plans and universities to Gillingham town centre.

Policy T21 Riverside Infrastructure

- 4.16. Policy T21 should clarify that this does not apply to proposed site allocations for redevelopment, which could be achieved simply through the addition of the words '*Unless allocated for alternative development*' at the start of the policy.

Policy T26 Accessibility

- 4.17. The supporting text references walking and cycling within 15-minute neighbourhoods and the policy emphasises the importance of bus accessibility. Peel Waters would support a flexible approach to the application of these standards.
- 4.18. Wakenshaw & Bunn has undertaken research (entitled '*How Far do People Walk?*') based on data from the National Travel Survey which shows that, where walking is the first leg of a trip by bus, the average walking distance is 580m and the 85th percentile is 800m (outside London), which are more manageable distances.
- 4.19. Peel Waters proposes that the paragraph preceding the bullets and the bullets themselves are amended to introduce more flexibility in line with the Wakenshaw & Bunn research as follows:

Strategic and major development proposals for new homes will also be planned to ensure good quality walking routes are available to bus stops and which promote ~~enable the maximum~~ walking distances to bus stops as part of medium to longer distance journeys which are within the following:

- Core bus corridors with ~~two or more~~ high frequency services will require a maximum walking distance of ~~500~~ 800 metres
- ~~Single high frequency routes (at least every 12 minutes) will require a maximum walking distance of 400 metres~~
- Less frequent routes will require a maximum walking distance of ~~300~~ 580 metres

- Town / City centres will require a maximum walking distance of 250 metres

Policy DM19 Vehicle Parking

4.20. Peel Waters supports a bespoke approach to parking for large scale residential development based on best practice design principles and proposes that the residential standards are not expressed as a *minimum requirement* and are considered on a site-by-site basis.

Policy DM21 New Open Space, Outdoor Sports and Play Spaces

- 4.21. The Fields in Trust open space standards are an important starting point for consideration of how any development might best deliver new and accessible spaces that are resilient to climate change, adaptable and promote active healthy lifestyles.
- 4.22. Peel Waters is confident that the regeneration of SM16 will be able to deliver excellent new spaces, although the policy should recognise that the requirement to achieve the minimum quantities set out can be challenging when planning for higher density urban development, the need for which should be informed by an analysis of the quantum and quality of existing open space available and proposed.
- 4.23. By way of illustration, the standards require a *minimum* 5.35Ha per 1,000 population. Site SM16 proposes 3,000 homes and could support a future resident population of circa 6,000, which would generate a requirement of 32.1Ha of open space (6 x 5.35). However, the entire site proposed for allocation is only circa 26Ha in size.
- 4.24. The requirements to meet the minimum space standards will therefore be difficult to achieve in full on higher density apartment-led schemes along the urban waterfront.
- 4.25. The enclosed JMA Medway Waterfront Regeneration document demonstrates how the land within site SM16 might reasonably deliver 3,000 new homes alongside extensive new public realm, primarily in the form of new waterside boulevards and linear paths and new areas of open space within the heart of the masterplan, which could also incorporate playing fields.
- 4.26. There is also potential to activate and utilise the water of the docks for recreation and additional open space and the new paths and links will provide ready access to existing open space within the wider vicinity.

4.27. Overall, we question if the standards are appropriate for high density brownfield regeneration sites and propose that a bespoke approach is taken for Chatham Docks and other strategic brownfield allocations.

Policy S24 Infrastructure Delivery

- 4.28. Peel Waters agrees that development coming forward in Medway should deliver new or improved infrastructure to mitigate the impact of development. However, as drafted the policy is broad and undefined and development will not proceed if it is unviable. Peel Waters is concerned that, as drafted, the policy will lead to all major proposals necessarily being supported by open book viability appraisals which risks adding delay to delivery.
- 4.29. Peel Waters notes that the Infrastructure Delivery Plan will be subject to iterative reviews (p10.5.6) which will be important to ensure that development can be appropriately mitigated.
- 4.30. One of the key components for SM16 is the 'Proportionality Assessment' document which states that Gillingham Gate has been identified (through modelling) as being over capacity at the end of the Plan period.
- 4.31. It is one of seven locations for which an improvement has been identified - described as '*concept designs*.' Of the seven, Gillingham Gate is the only one for which mitigation hasn't been identified as being necessary within a 10 year period and the document states that capacity is only exceeded at the end of the Plan period.
- 4.32. There is a further document entitled '*Junction Modelling and Mitigation*' which presents the proposed future roundabout improvement at Gillingham Gate. Acting for Peel Waters, highways consultancy TTHC has reviewed the LINSIG software test output provided for the existing junction layout and, even the 2041 (end of plan period) scenario results do not show a significant over capacity issue.
- 4.33. Only a couple of locations within the overall junction are at, or slightly above, capacity. Even if this level of performance was occurring today TTHC questions whether there would be justification for an improvement, let alone promoting one now based on a forecast so far into the future and against the direction of travel in respect of Policy.
- 4.34. Furthermore, there is no evidence presented of any attempt to improve the parts of the existing junction where overcapacity has been identified.

- 4.35. With regards to the tests for the proposed roundabout based on the information provided, there is an improvement in performance, but this appears to have been modelled without any controlled pedestrian and cycle crossings. This ‘*concept design*’ is not a scheme which would be taken forward and so the testing basis is flawed. In its current form it would also fail a safety audit.
- 4.36. Overall, therefore, Peel Waters does not accept that the proposed new gyratory is required at the end of the Plan period and we would welcome the opportunity to review and discuss the proposal in detail with the Council and Jacobs to establish common ground ahead of the Examination in Public of the Plan.

Policy T43 Safeguarding of Existing Waste Management Sites

- 4.37. This policy should clarify that ‘*unless allocated for development*’ existing waste management facilities should be protected. There are existing waste management sites within site SM16 that should be released to facilitate the proposed development, and the related designations should be removed from ‘South East’ Policies Map.

Policy SA4 River Waterfront

- 4.38. The proposed regeneration of SM16 will provide a new river waterfront walkway that crucially fills the existing gap resulting from the industrial estate. This development will provide significantly greater public access to the waterfront of both the river and docks and, through the proposed new greenway route, from Chatham Waters to Gillingham town centre.
- 4.39. These new and enhanced routes will greatly benefit sustainable development and accessibility to the surrounding communities, universities and future residents.
- 4.40. Peel Waters supports and is promoting these critical ‘key moves’ as set out in the attached illustrative masterplan and has been engaging with the Council and other key stake holders with land interests along the river waterfront on the emerging proposals. However, these discussions are at a relatively early stage and Peel Waters considers that the Figure 11 ‘*River Waterfront Concept Plan*’ does not realistically capture the extent of the potential and is not clear of its purpose.
- 4.41. Peel Waters suggests that this concept plan is removed as it could be misleading or it could be updated to reflect the JMA illustrative masterplan enclosed.
- 4.42. On the detailed criteria set out in the policy wording, Peel Waters questions the benefit of exploring renovation of existing buildings (3) and its compatibility with the scale of proposed new build development along the riverside waterfront.

- 4.43. The existing riverside environment within site SM16 is very industrial with no green infrastructure along the river edge (and no public access), but that hard edge provides a critical flood defence that should not be compromised. There will be plenty of opportunity for the regeneration of this land to introduce new softer landscaping and to create a welcoming and attractive riverside walk and other new green spaces.
- 4.44. In respect of the wording at 7c, Peel Waters suggests that this is amended to remove the reference to '*generous amount*' (which is unclear) and refer to Site SM16 delivering a '*network of high-quality public realm and green infrastructure.*'
- 4.45. Peel Waters notes that the wording at paragraph 8 of the policy recognises the practical inability of the waterfront sites providing for adequate space to meet all '*the requirements for open space and playing pitch provision in line with the Field in Trust Standards*' (see comments on Policy DM21 above).
- 4.46. By reducing the onsite requirement to the amenity, equipped and informal play elements of the standard, would reduce the onsite requirement to circa 1.15Ha per 1,000 population so, on the basis of a population of circa 6,000 as set out above, an onsite area of 6.9Ha would be required which is clearly more realistic and achievable. The illustrative masterplan attached incorporates circa 7.5Ha of open space and public realm areas along the waterfront on the land to the north of Basin 3.
- 4.47. Peel Waters generally supports the objectives of the policy as set out but notes that it should not be too restrictive at this early stage in the design process (for example, requesting segregated walking and cycle ways at this early point is unnecessary (13e) and would better come through the design evolution.
- 4.48. Similarly, in respect of point 14 (specific to SM16), rather than a development brief, a heritage assessment could more readily inform the emerging masterplan and future design with less likelihood for delay.
- 4.49. The 'subsequent design principles' also need further thought. Peel Waters has already been collaborating with the Council and other site promoters, but it will be important to ensure that development at SM16 can come forward irrespective of progress on other sites in the vicinity (and vice versa). Furthermore, it is not clear what is meant by '*delivery will be secured by legal agreement*' (point 20).

Policy SA14 Employment Sites

- 4.50. The mix of uses included against SM16 at the bottom of the table should be updated to include Eg(ii) and ancillary office, to accord with the outline permission.

Appendix A Local Centres

- 4.51. The LC18 plan should be amended to include the terrace of commercial / retail units facing the dock within Chatham Waters.
- 4.52. Peel Waters also supports the principle of an additional local centre on site allocation SM16 to the north of the basin, but at this stage it's too early to identify a specific location. The enclosed JMA Medway Waterfront Regeneration document identifies the potential for community and commercial buildings to support the growing population.

Appendix B Parking Standards

- 4.53. These are dated from 2001 and should be generally updated to reflect the current use class order.
- 4.54. The residential standards are dated from 2010 and expressed as a minimum standard. We suggest that a bespoke approach would be more appropriate for brownfield strategic allocations and request that the reference to *minimum* is removed.

Appendix D Safeguarded Waste Sites

- 4.55. The safeguarded site at Chatham Docks should be removed from the list as it falls within SM16 which is allocated for development.

5. Evidence Base Documents

- 5.1. We have a handful of additional comments on the evidence base documents as follows:

Land Availability Assessment

- 5.2. The proposed uses approved at Basin 3 (page 18 of the document) should be corrected to E(g) (ii) (iii); B2 and B8 and ancillary office.

Employment Land Needs Assessment

- 5.3. The quantum of floorspace approved as a part of the Basin 3 application referenced at Paragraph 4.38 should be amended to 31,000m².
- 5.4. Paragraph 4.48 refers to ArcelorMittal letting two units at Chatham Docks in January 2020. This should be removed as it is not correct.
- 5.5. Paragraph 4.87 refers to offices having approval at Basin 3. This reference should be amended to clarify that the approval is for E(g) (ii) (iii); B2 and B8 uses with *ancillary* office space.
- 5.6. Paragraph 7.6 and Table 7.3 refer to committed supply of 12,649m² of mixed B classes at Basin 3. It is not clear what this reference relates to as 31,000m² has outline permission.

Transport Assessment

- 5.7. Table 3.3 includes explicitly modelled developments which identify Chatham Docks with 321 households and 130,054m² of development. It is not clear what these figures relate to.
- 5.8. At Table 5.3 and 5.4, potential employment site details have been modelled which, for site SM16, comprise 100,000m² of employment space, which is more than three times the 31,000m² approved, along with 3,000 households. It is not clear why this larger employment figure has been used.
- 5.9. At paragraph 8.3.6, Jacobs propose a major redesign of the existing Pier Road / Gillingham Gate gyratory, which is also safeguarded on the proposals map. The existing junction was originally designed to accommodate the future traffic forecast to be generated through major residential-led regeneration of the Chatham Docks Industrial Estate now proposed. For the reasons set out above under Policy 24, Peel Waters does not accept there is any requirement for this further upgrade to a six-arm gyratory, and welcomes further engagement to

review and establish areas of common ground on the underlying rationale for the proposal (which the Infrastructure Delivery Plan estimates on page 23 would cost between £18m and £38m).

Local Plan Viability Assessment

- 5.10. Following a review of the Local Plan Viability Assessment 2025 Update, Peel Waters has various comments that have been drafted by Cushman & Wakefield (C&W), who have been advising on viability. Overall, Peel Waters welcomes the updates which demonstrate that the site is deliverable if Section 106 contributions and affordable housing requirements are set at the correct level.
- 5.11. As a large previously developed site, SM16 will require remediation, flood defences and other infrastructure which will have a significant cost, but Peel Waters is confident that the site can be delivered as there is a good understanding of the site constraints and has been delivering mixed use development at a similar scale at Chatham Waters over the last 10+ years.
- 5.12. Peel Waters' representation to the Regulation 18b Draft Plan submitted on 8 September 2024 included submissions on the draft viability appraisal (at Appendix 2) prepared by C&W. From a review of the June 2025 updated viability appraisal, it is apparent that some of our previous comments stand and would benefit from further engagement to clarify and resolve.
- 5.13. The comments below therefore relate to specific points within the assessment that Peel Waters would like to discuss in further detail, but we reserve our position to make additional comments in due course and encourage the Council to proactively engage with a view to establish common ground on the overall approach to viability and the delivery of strategic brownfield sites.
- 5.14. At paragraph 4.52 of the Local Plan Viability Assessment 2025 Update, C&W did not explicitly "confirm" the price assumptions and would like to refer the Council back to the comments submitted to the Reg 18b draft in September 2024 at page 7. In due course, once the proposed masterplan has evolved and a planning application is prepared, it will be possible to make more refined price assumptions based on the more detailed designs.
- 5.15. The references in paragraph 4.73 and 4.82 to figures put forward by C&W were based on very brief initial discussions and Peel Waters reserved its position to comment further.

- 5.16. At paragraph 4.89, C&W did not suggest 70% was appropriate and refers the Council back to the September 2024 representation and specifically the comments made at page 7.
- 5.17. Table 6.4 refers to sales of development land in 2025 and includes land at Chatham Docks Pier Road (Chatham Waters). It is unclear what this relates to as no land has been sold for 950 units in 2025. Chatham Waters is a mixed-use development in any event.
- 5.18. Paragraph 6.25 includes misinterpretation of a brief discussion and values of the order set out *might* potentially be appropriate, subject to further due diligence.
- 5.19. Peel Waters' point at paragraph 7.4 was that it will likely be necessary to revisit the viability assumptions for the site at the time of any planning application (not the delivery of the site).
- 5.20. Similarly, the point made at paragraph 7.24 was simply that further detailed site due diligence would help inform whether a 10% allowance for abnormal costs was reasonable.
- 5.21. The comments at paragraph 9.11 have also been slightly misrepresented. C&W suggested that 20% circulation space was the very bottom end of the range and that, in any event, this would need to be revisited based on the detailed designs of any scheme in the future.
- 5.22. At paragraph 11.8 the viability assessment again makes reference to employment land values which C&W set out *might* potentially be appropriate, subject to further due diligence.

Other Representations

- 5.23. Peel Waters notes that a representation was submitted to the Medway Local Plan Regulation 18 Consultation in September 2024 by Dentons on behalf of ArcelorMittal Kent Wire, which is a current tenant on the Chatham Docks Industrial Estate Site. The representation seeks to retain the land in employment and includes a masterplan vision proposing the redevelopment of the site for industrial use, centred around retaining the operational port.
- 5.24. The representation fails to acknowledge that retaining the site as an operational port is not viable as the Victorian lock gates have reached the end of their operational life and would need to be replaced at cost that would not be borne by the proposed development.

5.25. The long-term future of the site as an industrial estate between the two successful waterfront residential areas of St Mary's Island and Chatham Waters would be contrary to the key objectives of the Local Plan and would forgo the significant benefits of the proposed regeneration set out in the enclosed JMA vision document.

Appendix 1

JMA Medway Waterfront Regeneration Document

(submitted as a separate document)



Peel Waters Medway Waterfront Regeneration Vision Document

Client(s)



Project Team

Jon Matthews Architects



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The purpose of this document is to help articulate the potential benefits of regenerating proposed site allocation SM16 (Chatham Docks Industrial Estate and the remaining undeveloped land at Chatham Waters). It is based on a clear technical understanding of the site constraints, including accessibility; flood risk and ground conditions.

It sets out illustrative plans that help demonstrate how the overall site can deliver approximately 3000 new homes over the plan period and beyond, along with a mix of other uses including 31,000sqm of employment space, local centre; retail and commercial spaces all set around significant new public realm that showcases the River Medway and former naval docks, opening this land up to the public for the first time ever.

The proposed development will introduce new pedestrian and cycle links that will fully integrate the development with the surrounding uses which include the existing community on St Mary's Island, the universities, Gillingham town centre and the riverfront to the east.

Peel Waters is committed to support the long-term ambitions of Medway Council in connecting and creating high-quality mixed-use neighbourhoods and believes this remaining part of the industrial estate around Basin 3 offers a unique opportunity to deliver a new residential and employment Strategic Site which will complement the successful Chatham Waters development.

Peel Waters has commissioned Jon Matthews Architects, established master planners who were involved in the original Chatham Waters Outline Planning process, to assemble this vision document for Chatham Docks Industrial Estate masterplan which focuses on the area to the north of the basin.

The principles of this vision document highlight that the industrial estate (north of the basin) can provide a deliverable, sustainable mixed-use community providing circa 2,500 new homes with associated amenity and services required to serve this new neighbourhood. This is alongside a further 500 new homes at Chatham Waters, and is in addition to the next residential phase of 300 homes at Chatham Waters, which is pursuant to the remaining residential units permitted by the existing outline consent.

We have investigated the site and local context in order to carefully develop a proposal that connects the existing neighbourhoods of St Mary's Island and Gillingham Pier, whilst building upon the success of Chatham Waters and helps to open up the River Medway via creating new pedestrian corridors and open spaces. Our proposal has also considered the enhancement and accessibility to the site's heritage assets.

- This vision document includes the following information:
- An indication of the intended vision for the site and an explanation as to how the form of the development will achieve that vision;
 - An illustrative sketch for the whole site;
 - Quantum of development, type of uses, building height parameters;
 - An indication of the location of other proposed mixed uses to be provided, which may include employment, leisure/sport facilities, small scale ancillary retail uses, bar/restaurant uses, and community facilities;
 - An indication of the location and amount of public open space/informal recreation areas to be provided within the development;
 - An indication of how development will maximise the potential of the waterfront and provide active frontages to the Medway Estuary;
 - An indication of how the proposed development will be integrated with existing communities on St. Mary's Island, Chatham Waters, with the universities and other neighbourhoods beyond;

Peel Waters is committed to delivering “long term” place making along the River Medway waterfront in partnership with Medway Council, developers, local businesses, educational establishments and employers.





1.1 Site Context

Chatham Docks Industrial Estate was formed after the closure of the wider Chatham Dockyards in 1984, ending 400 years of the Royal Navy's presence in Chatham. Basin 1 was designated and redeveloped as a marina, and St Mary's Island has been repurposed as a new residential community over the last 30 years.

Chatham Docks Industrial Estate around Basin 3 retained its river access through the original Victorian naval lock gates, which are increasingly difficult to maintain and have reached the end of their operational life. In parallel, residential development has developed on both sides of the industrial estate, across the former naval docks, such that the heavy industry and recycling operations are now very close to residential and leisure uses which are not compatible and lead to regular resident complaints.

The river frontage to the east of the industrial estate also has an industrial and maritime past yet has seen redevelopment and regeneration over recent years and there remain significant further opportunities to deliver more. In isolation, the Chatham Docks Industrial Estate presents an exciting and major opportunity to unlock a fantastic new mixed-use development that builds on Chatham Waters and integrates with the community on St Mary's Island.

Collectively, however, the riverfront sites provide an even more compelling case for transformative change, introducing new links and a finer grain of development that will attract and encourage people to enjoy access to the river and Basin 3.

It will allow residents and employees, students and visitors, to move easily between the universities and the waterfront and between communities both east and west. With the proposed green link utilising the former dock line, there is also the fantastic potential to create a cycle and pedestrian way right to Gillingham Town Centre and train station.

Unlocking the riverside potential is necessary for the success of the Local Plan and Medway's strategy for growth. It is critical to help deliver the required new homes and employment areas and is therefore critical to make the Plan sound.

The map illustrates the regeneration opportunities along the River Waterfront area listed in the Medway Local Plan.

- 1. Regeneration of Chatham Docks Industrial Estate: 2,500 homes as part of mixed use scheme
- 2. Basin 3 Employment Campus: 31,000sqm
- 3. Chatham Waters: 500 homes
- 4. Pier Approach Road Depot: 176 homes
- 5. Gillingham Marina: up to 1,100 homes
- 6. Former Gas Works: up to 500 homes





1.



2.



3.



4.



Key Plan



5.



6.

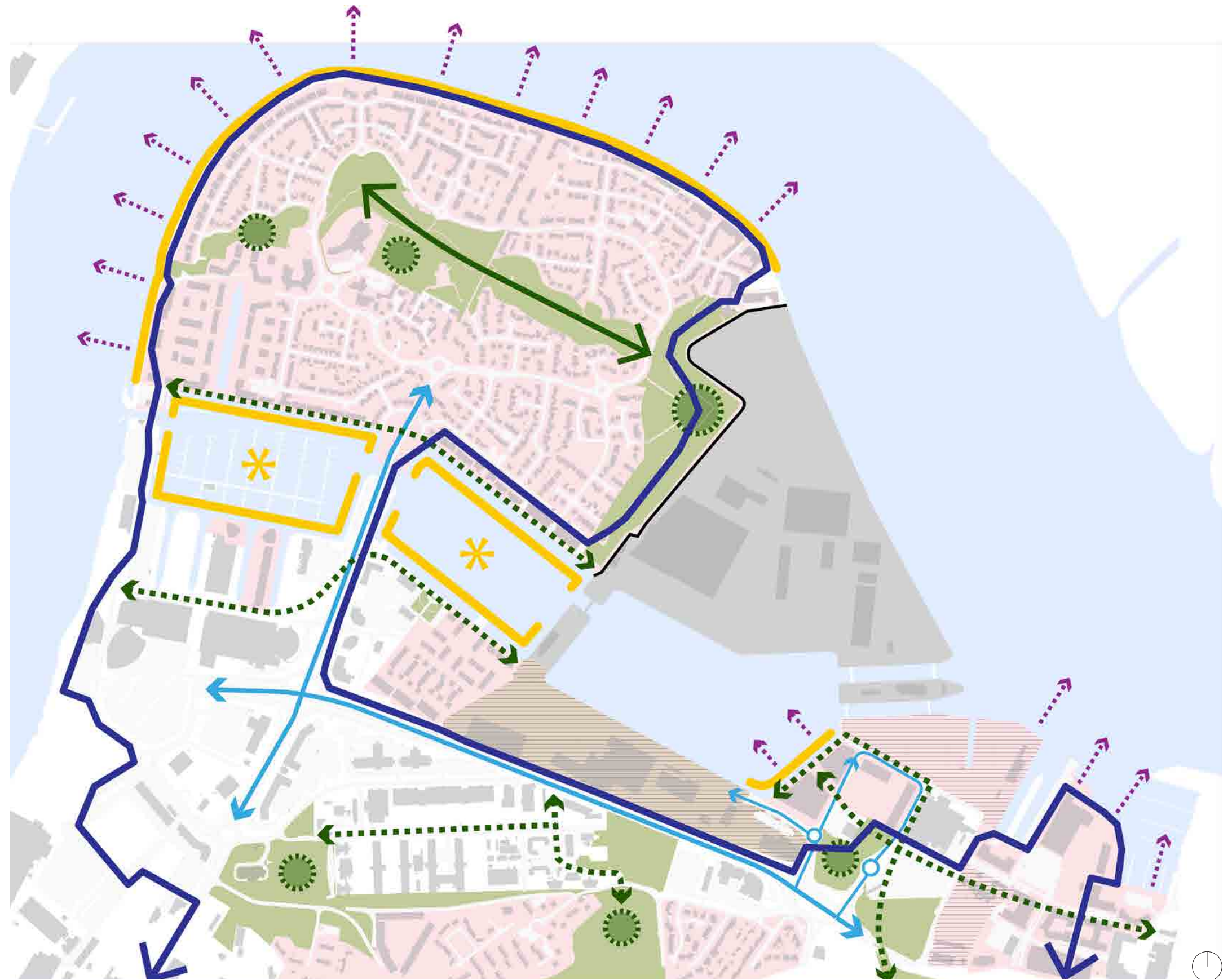
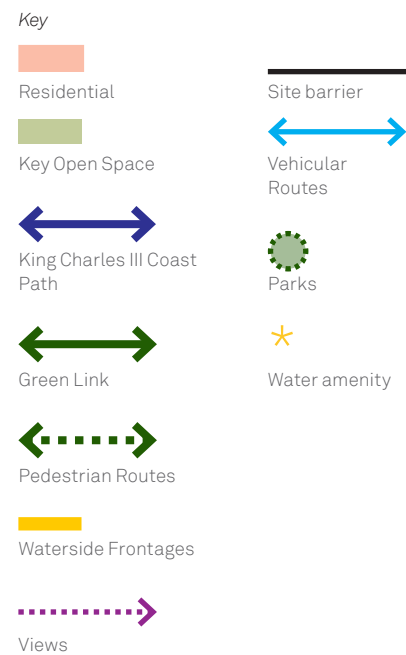


7.

The site currently lacks connection to surrounding areas and limits public access to the water. The site is a barrier to positive connectivity.

The constraints are summarised as follows:

- Residential use disconnected along the river waterfront
- Site offers zero amenity to local residents and the wider community
- No connection to the built and emerging developments around the site
- No public access along the river. King Charles II route is diverted around the site
- No frontage, views to or activation of the river
- Limited positive frontage and pedestrian access around the basin.



The key opportunity is to connect the surrounding Medway areas and communities via positive public permeability through the site and capitalise upon access to a unique and historic waterfront setting.

Through the positive regeneration of the site, the masterplan proposals will mend the grain and integrate the site with existing neighbourhoods along the waterfront.

The opportunities are summarised as follows:

- Create a vibrant new neighbourhood with connections to the St Mary's Island and the surrounding Medway areas
- Extend King Charles III Coast Path along the river waterfront
- Activate the river with positive residential and leisure frontage
- Activate the basin with opportunities for innovative amenity such as floating padel tennis, saunas, lidos and marinas
- Create an amazing sense of place with access to a vibrant mix of new public open space; parks, squares, & play spaces
- Maximise views of the river, basin and new green spaces.

Key

Residential

Key Open Space

King Charles III Coast Path

Green Link

Pedestrian Routes

Waterside Frontages

Views

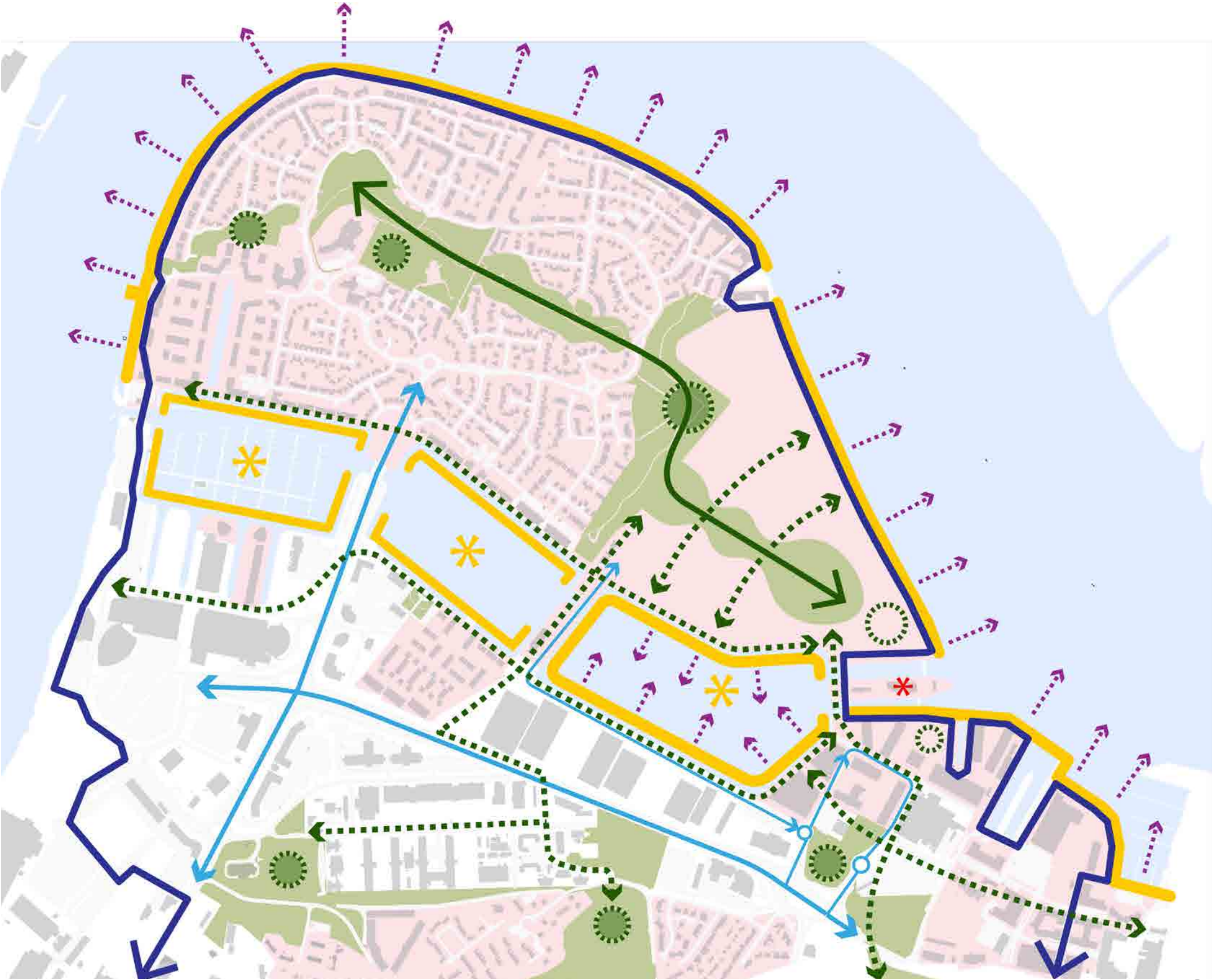
Vehicular Routes

Parks

Public Squares

Water amenity

Heritage asset re-use



1.3 The Illustrative Masterplan - Plan

10

Jon Matthews Architects

The proposed development will replace the under-utilised and heavy industrial / recycling uses on the existing industrial estate with much needed homes and a wider mix of commercial, leisure and community uses and public open space. These uses will sit more suitably alongside and fully integrate with the existing residential uses to the east and west of the site, enabling and welcoming residents and visitors to easily permeate through the site and enjoy its unique features, comprising the unique waterfront setting.

The longterm vision will activate the waterfront and Basin, which will become an accessible and valuable leisure destination for Chatham and Gillingham residents.

The plan and visual opposite is illustrative and intended to show the site's development potential.





1.4 The Masterplan Key Moves

The experience gained over the last 10+ years place making and regenerating the land to the east of Basin 3 (Chatham Waters) provides a robust template for ongoing regeneration of the wider industrial land.

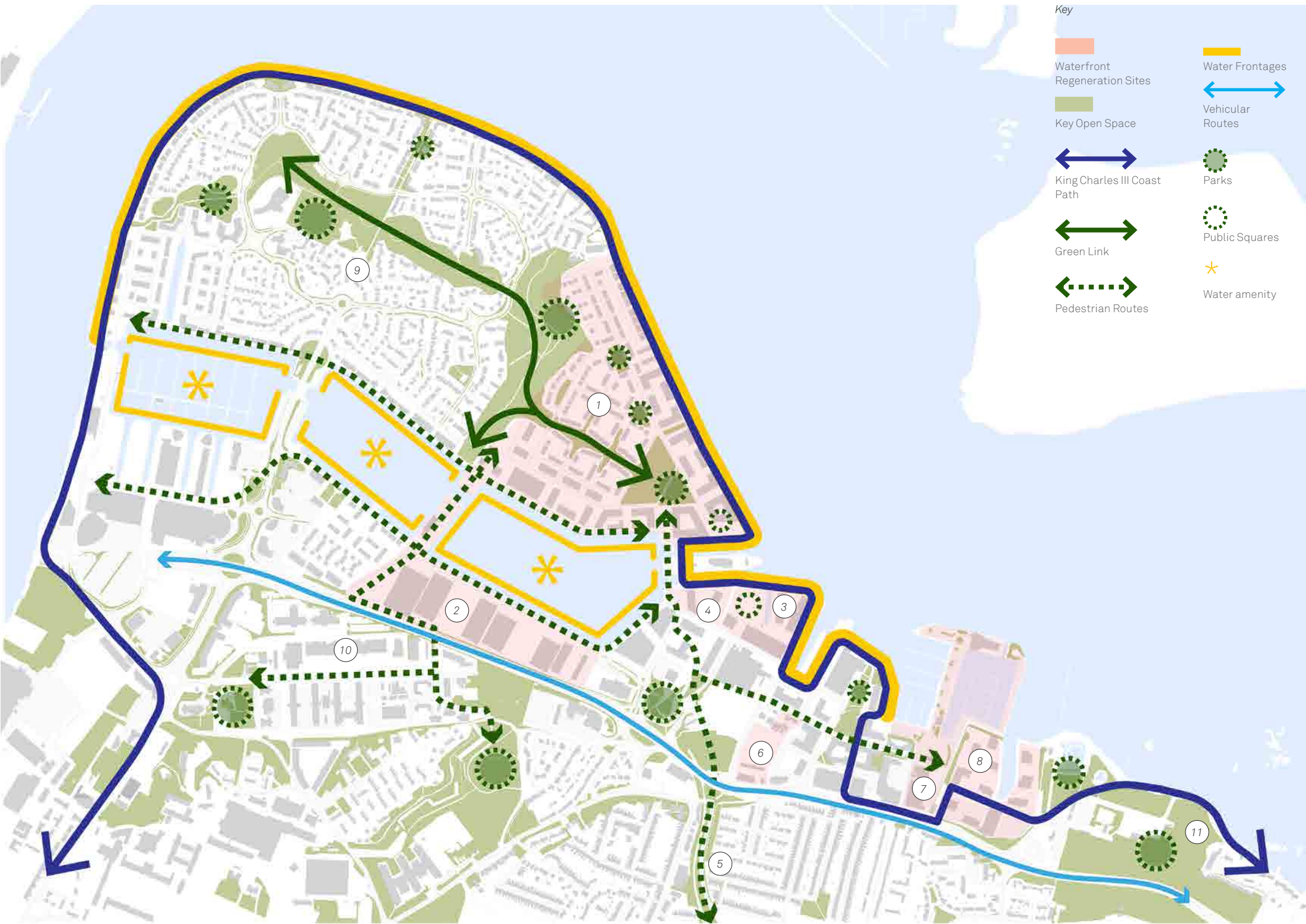
The key moves demonstrate how the scale of development proposed through the allocation can readily be accommodated on the site and the illustrative plans provide an indication of what the proposals could comprise.

1. Waterfront Regeneration & Connectivity

The proposals for the regeneration of Chatham Docks Industrial Estate form a key part of the River Waterfront Site Allocation identified by the draft Local Plan. The plan opposite shows the scale of the opportunity and identifies the key sites within the allocation. In the area around Gillingham Marina and the Former Gas Works, only existing connections and green spaces have been identified as the proposals for these sites are beyond the control of Peel Waters. However, as part of the existing working group set up by the Council, there are opportunities for further discussion and for the plan to be updated to show additional benefits that could be generated through opening up these sites.

The opportunities to be delivered by Peel Waters are set out below (Nos 1-5). Other sites within the River Waterfront Site Allocation are listed at Nos 6-8, along with the capacity for new homes identified in the Local Plan. Other key locations in the local area listed at Nos 9-11.

- 1. Regeneration of Chatham Docks Industrial Estate: 2,500 homes as part of mixed use scheme
- 2. Basin 3 Employment Campus: 31,000sq.m
- 3. Chatham Waters: 500 homes
- 4. Chatham Waters: 300 homes (pursuant to existing outline consent)
- 5. The Greenway
- 6. Pier Approach Road Depot: 176 homes
- 7. Gillingham Marina: up to 1,100 homes
- 8. Former Gas Works: up to 500 homes
- 9. St Mary Island
- 10. Universities
- 11. The Strand Leisure Park



To Gillingham Town

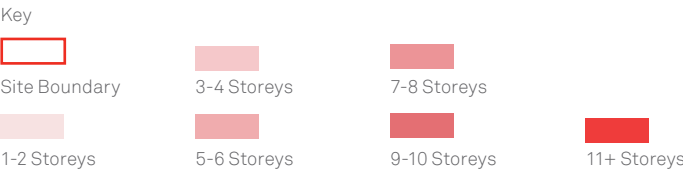


2. Appropriate scale

The proposed heights across the site are set out into zones increasing along the waters edge to a height of 23 storeys, with the potential to increase up to 40 storeys. This strategy provides an opportunity to locate a landmark building at the south east corner of the site.

The use of height along the riverside and dock edge will maximise the opportunity for waterfront living, river aspect and amenity at ground level.

Residential buildings at the core of the masterplan sit within more of a parkland setting.



3. Open Space

Areas of key open space are allocated throughout the site providing a range of high quality public amenity. This will establish an identity and help create landscape characters within the site. Key vistas will connect the parks and open spaces with new permeable links extending beyond the masterplan to the surrounding areas.



4. Activated & Accessible Waterfronts

The waterfront is brought into active use. These uses can also extend into and throughout the development. The waterfront is accessible to all linking wider reaching residential communities along river Medway.

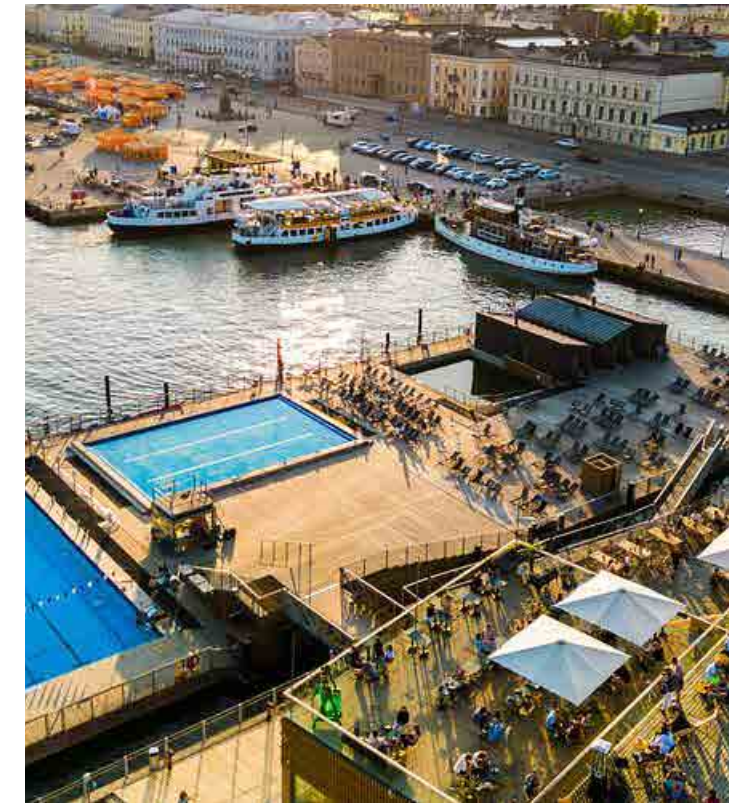
Residential mixed use developments sit along the waterfront with commercial public amenity at ground level. Public open space along the waters edge creates a strong sense of place and identity. New pedestrian and cycle routes can be extended around the perimeter of the site to connect with a much wider and far reaching existing and emerging networks, including the proposed green link to Gillingham High Street along the line of the former dock railway. The opportunity for such an extensive link to the waters edge with well connected, permeable links to a much wider community is truly unique. The proposed green link extending through the site presents a far wider opportunity for public benefit as it will help reconnect.

Active frontages along the water creates opportunity to maximise amenity and activity to the dock edge whilst linking with an established Chatham Waters marina frontage.





1. Floating Sauna



2. Floating Lido, Sauna & Marina



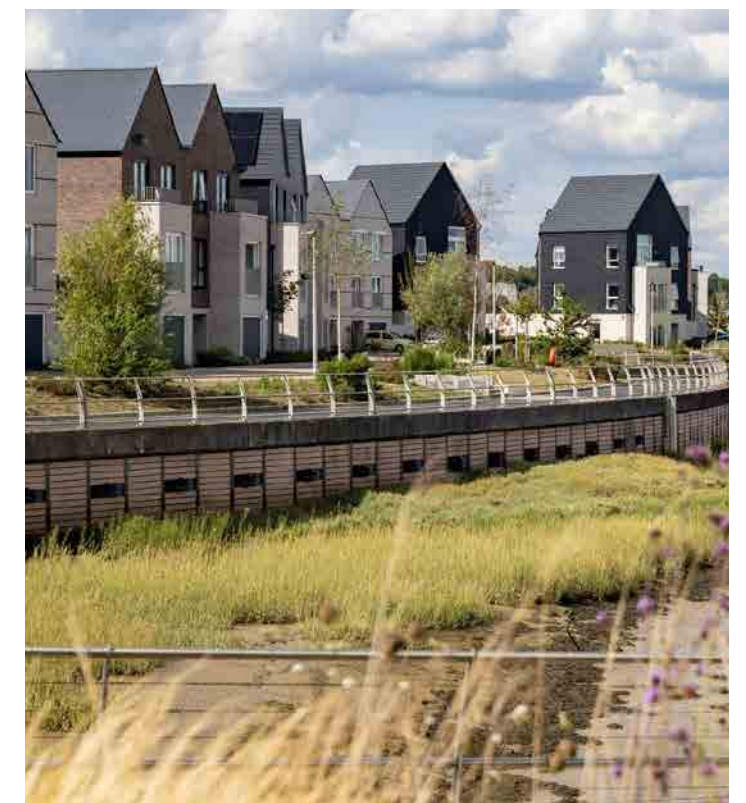
3. Multi-Use Public Squares & Spaces



4. Central Park



5. Informal Landscape Corridor



6. Family Homes

Simple, elegant design.

KITEWOOD ESTATES LTD RESPONSE TO MEDWAY LOCAL PLAN 2041 CONSULTATION [REGULATION 19] - August 2025

Kitewood Estates Limited ('Kitewood') is a privately owned development company with expertise in delivering homes and other development in London and the south east of England. We welcome the opportunity to comment on the Proposed Submission Draft Local Plan; Medway Local Plan 2041.

Kitewood falls into the SME category of developer and we welcome the Council's recognition of the contribution that SME housebuilders can make to delivery. Whilst SME housebuilders are likely to be responsible for the delivery of smaller sites, depending on the experience and expertise of the company, they are often capable of delivering larger sites. For example, Kitewood is currently building out 300 homes near Whitstable and 180 homes near Herne Bay, along with a range of smaller, medium-sized and larger sites. An up to date Local Plan and flexibility with balancing policy requirements is often what SME's require to provide a reasonable degree of certainty to bring sites forward without delay.

Kitewood in the Draft Local Plan: Site HW11

The Council will be aware that Kitewood is promoting the land at **Broomfield Farm (Site: HW11)** and a full detailed planning application (ref: Ref. **MC/24/2370**, validated on 21 Nov 2024) comprising the following development is currently being determined by the Council:

Construction of sixty dwellings with associated garages and off street parking, landscaping, access and highways, open space and foul water pumping station - demolition of all existing buildings and structures.

As shown on the Site Plan extract below, the site can comfortably accommodate at least 60 homes, open space in excess of the policy requirements, and at least 10% Biodiversity Net Gain. The site does not require any significant infrastructure to be delivered to enable the delivery of the homes, and it will therefore make an important contribution to the five year housing land supply.

The s106 agreement associated with the above application has been drafted, and it is anticipated that the Decision Notice will be issued later this year. It is therefore anticipated that the site will be delivered within the first five years of the Plan Period (i.e. years 1-5).

The Broomfield Farm site (HW11) falls under proposed **Policy SA7: Capstone Valley**. We generally support Policy SA7 however, as evidenced by the Site Plan extract below, the site can accommodate 'at least' 60 dwellings, rather than 'up to' as the emerging Policy currently suggests.

Furthermore, as evidenced by the current planning application, the site is capable of being delivered in Plan Period (years 1-5) and the reference to 'and 6-10' should be deleted.

Whilst we recognise the drafting efficiency of including multiple site allocations under a single strategic policy, we consider that separate, site specific policy allocations may be more effective. In order to deal with the site specific requirements such as, the anticipated on-site Open Space typologies, i.e. those that can be reasonably accommodated, and any off-site works or contributions that may be sought in addition to any known s106 cost estimates as set out in the Developer Contributions and Obligations SPD. This approach would help to ensure that no unexpected viability concerns arise at a later date on each site within the Capstone Valley.

Fig 1: Broomfield Farm (Site: HW11) Site Plan associated with planning application ref. MC/24/2370



Draft Local Plan Legal Compliance and Soundness

Medway Council's current Local Plan 2003 is now more than 20 years old, and this new Local Plan is therefore desperately needed to ensure that there is a continuous supply of new homes and other development across the borough.

The publication of the Draft Local Plan 2041 Regulation 19 for consultation and the Council's intention to submit the Plan for Examination is a significant milestone, and we commend the Council for their continued positive engagement through the Planning Performance Agreement process regarding *Site HW11, Broomfield Farm*.

We agree with the Council's approach that puts the supply of new housing at the centre of the plan, which accords with the governments agenda to get Britain building and boost the supply of new homes.

Delivering a range of new homes to meet the needs of different sectors, and in particular young families, downsizers and first time buyers is important to meet the need and fuel economic activity to support regeneration and improve the overall quality of life for Medway's residents.

We recognise that a significant land take is required to deliver 1,636 homes per annum, 24,540 homes over 15 years. Whilst this is undoubtedly a challenge, it also represents a massive opportunity to create betterment through improved build quality and design, access to green spaces, transport improvements and s106 contributions towards the delivery of new and improved local services and facilities.

Overall, we consider that the Council's approach to the spatial strategy is appropriate, it accords with national policy and should achieve sustainable development; brownfield first (40%); housing extensions in suburban areas (30%) and Medway's Rural Areas (30%). This balanced approach is what is needed to ensure that an appropriate mix of homes with access to open space in the locations that they are needed is considered to be justified and effective.

Whist Kitewood, support the overall aims of Policy T2: Housing Mix that seeks to deliver a suitable mix of homes and an appropriate range of house types, we don't consider that particular reference to 'bungalows' is justified, nor is the text which suggests that all developments 'must' give consideration to older people downsizing. The land take required to deliver bungalows is inefficient and would not make the best use of land, and there are other types of housing, including accessible homes, that are designed to meet the needs of a range of potential end occupiers. Furthermore, the needs of older people downsizing should be balanced with other sectors of the community; including families and first time buyers etc. This sentiment is echoed at para 6.2.3 where the housing market evidence suggests that there is a need for all types and sizes of new homes.

On the topic of Affordable Housing, if Policy T3 is appropriately evidenced by the Local Plan Viability Assessment then it should be effective. We also think that it's reasonable to

anticipate less (10%) affordable housing delivery on Previously Developed Land and this should incentivise the brownfield first approach. However, our recent experience across Kent and the wider south east has highlighted an issue relating the tenure of Affordable Homes; and to ensure Affordable Homes can be practically and viably delivered requires flexibility and an understanding of the wider market conditions. Furthermore, whilst it is admirable that the Council would seek to prioritise a location connection for the allocation of Affordable Housing, this could act a deterrent for Registered Providers and we therefore question how deliverable this will be.

At para 6.3.16 of the consultation document, the Council acknowledge that there is an issue with securing Registered providers to enable the delivery of s106 Affordable Homes, but it's important to recognise this issue is not particular to SME's - it generally relates to sites of a size that will produce less than 100 Affordable Homes amongst other funding related matters and so on. However, we welcome the acknowledgement from the Council that they will work collaboratively to address this issue. The Council could help by adopting a flexible approach to the Affordable Housing tenure split on a site-specific basis, and this could be reflected within the supporting text.

Where it is anticipated that sites will deliver on-site Open Space, Policy DM21 New Open Space, Outdoor Sport and Play Spaces set out at *part f*; the types and quantity will be discussed with the applicant at the pre-application stage. This is a perfectly reasonable stance albeit, a 'quantity standard' approach may not be so straightforward. For example, (as anticipated at *part c* of the draft policy), where a typology cannot practically be provided on a site due to site specific constraints, such as the topography, flood risk etc, but where the overall Open Space provision is appropriate for the scale of development, the Council should take a reasonable approach to ensure that no financial contributions are sought in this regard to typology deficiencies. The cost of contributions towards off-site open space typologies, that cannot physically or practically be accommodated on-site may cause viability challenges down the line. It is unreasonable to expect a development site to provide ample open space with the appropriate typologies (that may be in excess of the overall expected quantities), in addition to off-site contributions for typologies that are not suitable to be delivered on site. This point should be addressed in the supporting policy text to ensure that where a site meets the overall Open Space quantity with the appropriate typologies, the Council will not seek financial contributions unless there is a demonstratable deficit of Playing Fields or Play Areas in the vicinity of the site to justify an off-site contribution.

Conclusion

Kitewood considers that the *Draft Medway Local Plan 2041 Regulation 19 is Legally compliant*, has been *Positively prepared* and *consistent with national policy*.

However, as set out above there are areas where the text could be modified to ensure that the approach is justified and that the Plan will remain effective for the duration of the Plan period.

In relation to the Broomfield Farm site (HW11) that falls under proposed **Policy SA7: Capstone Valley**. We specially suggest that the following is changed:

KITEWOOD

- Site capacity: 'at least' 60 dwellings; and
- Plan Period: the reference to 'and 6-10' years should be deleted.

Model Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this
representation relates:

Medway Local Plan

Please return to Medway Council Planning Service by 11th August 2025

Email: planning.policy@medway.gov.uk or post to:

Planning Policy, Medway Council, Gun Wharf, Dock Road, Chatham, Kent ME4 4TR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal

Details*

** If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

Bellway Strategic Land

DHA Planning Ltd (obo) Bellway
Strategic Land

Address Line 1

Eclipse House

Line 2

Eclipse Park

Line 3

Sittingbourne Road

Line 4

Maidstone

Post Code

ME14 3EN

Telephone
Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	Duty to Cooperate Housing Supply and Delivery Paragraph 14.7.1 Viability Report	Policy	Policy SA6 Policy DM5 Policy DM6 Policy T2 Policy T3	Policies Map	North West SNF3
-----------	--	--------	--	--------------	-----------------

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The plan is not legally compliant there are issues with the Duty Cooperate, Strategic Policies and Legal Tests and Housing Delivery.

Plan Period and Housing Delivery – The Plan Period should be amended and add one additional year to allow for flexibility. Please refer to Section 2 of the accompanying Representations Document (reference: 36409/RT Dated August 2025)

Duty to Cooperate – The Duty to Cooperate is currently incomplete and leaves several matters unresolved. A SoCG with Gravesham Borough Council is required for the delivery of Site Allocation Policy SA6 given its cross-boundary strategy.

There is a lack of SoCGs with other statutory bodies and Local Authorities. The Plan has therefore not fulfilled its statutory duty under Section 33A of the **Planning and Compulsory Purchase Act, nor is it "Consistent with National Policy"** (Policy 28 of the NPPF) **and is therefore not "Positively Prepared"**. Please refer to Section 4 of the accompanying Representations Document (reference: 36409/RT Dated August 2025).

Policy SA6 - requires development to be delivered cross-boundary with Gravesham Borough Council through a masterplan agreed by both Gravesham Borough Council and Medway Council. There is no information included within the Policy that provides a mechanism for the approval of the Masterplan.

Furthermore, the Council's Site Specific Housing Trajectory outlines that 20 homes from this site will be delivered in year 3, 75 in year 4 and 75 in year 5. Whilst Bellway are committed to delivering this, the Policy should be amended to allow for early delivery of housing without the reliance on Gravesham. Please refer to Section 3 of the accompanying Representations Document (reference: 36409/RT Dated August 2025)

Furthermore, the Council have not published information within the Viability Report to evidence the calculations of the S106 developer contributions required for this development. Please refer to Section 3.4 of the accompanying Representations Document (reference: 36409/RT Dated August 2025).

Policy DM5 is supported in principle but the incorporation of "dementia friendly" standards is not specific and is therefore not "Consistent with National Policy" (paragraph 16(d) of the NPPF)

Policy DM6 bullet point 6 is already included in Policy S1 and should therefore be removed to avoid unnecessary repetition.

Policy T2 is supported in principle but is repetitive with Policy T9.

Policy T3 is not "Consistent with National Policy". Paragraph 64 of the NPPF is clear that planning policies should specify the type of affordable housing requires, including the minimum proportion of Social Rented Homes. Policy T3 fails to include the tenure split. Please refer to Section 5 of the accompanying Representations Document (reference: 36409/RT Dated August 2025).

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The submitted Representations Document (reference: 36409/RT Dated August 2025) proposes the modifications necessary to make the Plan legally compliant and sound. Suggested wording of policies can be found in Section 3 and 5 of the submitted document.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To discuss the legal compliance and soundness of the Plan with specific reference to:

- The Duty to Cooperate
- Strategic Policies and Legal Tests
- Housing Supply and Delivery
- Site Allocation SNF5 and Policy SA6 (land west of Strood)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For details of our data privacy policy please see:

<https://www.medway.gov.uk/info/200133/planning/714/planning-service-privacy-statement>

Brompton Farm, Strood

Medway Council Regulation
19 Consultation Response

36409

August 2025



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DATE	Version	Revision Notes
07.08.2025	0.1	DRAFT
11.08.2025	0.2	FINAL

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1 INTRODUCTION

1.1 PURPOSE OF THIS REPRESENTATION

- 1.1.1 These representations have been prepared on behalf of Bellway Strategic Land ('Bellway') in response to Medway Council's (MC) Local Plan 2041 Regulation 19 consultation document (July 2025).
- 1.1.2 Bellway control the 'Land at Brompton Farm, Strood' (hereafter referred to as 'the site'), which they have previously promoted at various consultation exercises run by MC, including the previous Regulation 18b consultation in September 2024.
- 1.1.3 The Regulation 19 Plan includes the land controlled by Bellway as part of a residential-led site allocation (Site SNF5, Draft Policy SA6) for up to 4,000 dwellings, delivered cross-border with Gravesham Borough Council.
- 1.1.4 Bellway strongly supports the allocation of the site within the Local Plan, as set out within these representations.
- 1.1.5 The following representations have been made, with regard to the tests of "Soundness" in accordance with the NPPF paragraph 36, and identify what changes are necessary to make the plan "Sound".

1.2 PLAN CONTEXT

- 1.2.1 This consultation is MC's Regulation 19 consultation which runs from the 30th of June to the 11th of August 2025.
- 1.2.2 The consultation follows MC's Regulation 18b consultation which was undertaken at a high level and provided the vision, strategic objectives and an overview of the Strategic Growth Options available to the Council, alongside draft planning policies and planning policy maps. The Regulation 18b included indicative site allocations at a high level. The Regulation 19 consultation now includes draft site allocations and associated policies.

1.3 STRUCTURE OF THE REPRESENTATION

- 1.3.1 The representation structure is outlined below for ease of reference:
- Section 2 (Plan Period and Housing Delivery) – Addresses the Council's Plan Period and identified housing numbers
 - Section 3 (Land West of Strood) – Re-introduces the Site and supports its allocation.
 - Section 4 (Duty to Cooperate) – Addresses the Council's Duty to Cooperate Statement
 - Section 5 (Other Policies) – Sets out if the policies identified are supported and "Sound".

- Section 6 (Conclusion) – Summarises the key points raised throughout the representation and supports the need for changes to the Regulation 19 stage for the Plan to be found “Sound”.

2 PLAN PERIOD AND HOUSING DELIVERY

- 2.1.1 The Regulation 19 sets out Medway's development needs, identifying a current housing need of 1,636 homes pa or 24,540 over the Plan Period, increasing to 25,767 whilst accounting for the required 5% buffer. This covers a period of 15 years.
- 2.1.2 Paragraph 72a and 22 of the NPPF requires authorities to cover a period of at least 15 years from the date of adoption. The Plan at this stage, appears to cover the required period, however exactly 15 years provides little flexibility should there be any delays in Plan preparation, or delays in examination, meaning it would fall short of the required 15 years. The Council's published Local Development Scheme (December 2024) doesn't anticipate adoption until December 2026, which at this point, the Plan would have only 15 years left, allowing for no slippage, which is unlikely.
- 2.1.3 For the plan to be considered "Positively Prepared" and therefore "Sound", the Plan period must be extended by at least a further year to provide flexibility and cover inevitable delays in adoption to ensure it is consistent with National Policy and therefore met the legal tests.
- 2.1.4 The Plan period should be increased to at least 16 years, with a requirement for at least 26,176 homes (27,485 including the 5% buffer).

3 BROMPTON FARM (LAND WEST OF STROOD)

- 3.1.1 The site comprises approximately 44.6ha of Greenfield land in the Green Belt between Brompton Farm Road to the south and Hasted Road (the A289) to the north and Gravesend Road to the west.



FIGURE 2.1: SITE LOCATION (GOOGLE EARTH)

- 3.1.2 The site adjoins the urban confines of Strood, where residential dwellings associated with Brompton Farm Road are located. The site adjoins the Gravesham Borough Council administrative boundary.
- 3.1.3 In September 2024, representations in response to MC's Regulation 18b Local Plan publication were submitted to promote the site for allocation. The case made for the 18b representations and comments on the Plan's vision and strategic objectives is not repeated here; however, the submission document is included at **Appendix A**.
- 3.1.4 Following the Regulation 18b, the site is allocated in the Draft Local Plan for a residential-led development of up to 800 homes under Policy SA6. Bellway strongly supports the allocation of the site within this policy.

3.2 POLICY SA6

- 3.2.1 As set out above, Bellway strongly support the allocation of the Site under Policy SA6 and supports the policy in principle, however further flexibility should be provided on the individual sites coming forward in isolation.
- 3.2.2 As drafted Policy SA6 is a "cross-border" site allocation, encompassing a large portion of land with the Borough of Gravesham. The policy states that up to 4,000

new homes will be provided, alongside two primary schools, a secondary school, 2 hectares of employment and a local centre, 2 football pitches and indoor sports provision. 1,280 of these homes will be delivered within Medway Council's jurisdiction.

3.2.3 The allocation of land within in Medway is split into three parcels:

- SNF1 – Land west of A226 Gravesend Road and north of Brompton Farm Road – up to 360 dwellings (controlled by BDW Homes)
- SNF3 – Land bounded by Dillywood Lane, A226 Gravesend Road and Brompton Farm Road – up to 800 dwellings (controlled by Bellway)
- SR5- Land west of Stonehorse Lane – up to 120 dwellings (controlled by Brookworth Homes)

3.2.4 The parcel of land within Gravesham is controlled by the Church Commissioners.

3.2.5 Part 12 of Policy SA6, appears to recognise that the different parcels can come forward as separate planning applications, however, part 13 expects this to be informed by a wider masterplan:

"a comprehensive approach to site development will be expected, informed by an approved master plan, which demonstrates how the policy and infrastructure requirements set out in the respective plans relating to the site as whole, with a phasing plan, will be achieved."

3.2.6 Part 16 states that *"any application for development on part of the site shall accord with the approved masterplan and shall not prejudice the implementation of the site as a whole."*

3.2.7 Medway should not be reliant on Gravesham's Local Plan timings, or other landowners outside of the Borough to bring the site forward. Bellway are happy to prepare a masterplan which shows how the sites can work together, however they should then be able to come forward separately. All parties have met independently of the Council's meetings and are already in discussions regarding an overall high-level masterplanning process.

3.2.8 It is therefore reiterated as per the previous Regulation 18b representations, that this site is capable of independent delivery or delivery with the other landowners within Medway's Boundary, and should not be reliant on the delivery of Gravesham's Local Plan coming forward.

3.2.9 Within the Council's Duty to Cooperate Statement (dated June 2025) in Section 3.1, it is stated that *"it is important to note that the three sites in Medway, to the west of Strood, could come forward as independent developments, regardless of Gravesham Borough Council's emerging local plan, for 1,280"*. However, Policy SA6 does not provide a clear mechanism for this to occur, given the reliance on those in control of the land within Gravesham's jurisdiction to collaborate to prepare the masterplan, ahead of Gravesham's Plan coming forward.

3.2.10 This approach is prohibitive to the delivery of housing in Medway. Paragraph 1.3.5 sets out the Council's annual need for 1,636 homes across the plan period and states that *"housing is a major issue for the plan, and the scale of defined housing*

needs requires significant land to be identified for new housing sites. This is an important driver of the spatial strategy”.

- 3.2.11 Policy SA6 identifies that this Site, alongside SR5 and SNF1 can deliver housing within between years 1-5 of the plan. This is discussed further below.

3.3 HOUSING DELIVERY

- 3.3.1 The Council’s published Housing Trajectory (Appendix G of the Land Availability Assessment) states that 20 homes will be delivered in the third year of the Plan 2028/2029, followed by 75 homes in year four and 75 in year five. Whilst an ambitious target, Bellway are committed to delivering this, however would reiterate that Gravesham’s Plan does not need to come forward to allow this delivery and could be prohibitive, if there are delays.
- 3.3.2 The policy wording therefore needs to be amended to allow for these units to come forward in the early years of the plan, and isolation. This Section details the reasons as to why this site is deliverable in its own right, to enable housing delivery.

Grey Belt

- 3.3.3 Firstly, the preamble to Policy SA6 (Paragraph 14.7.1) states:
- “Gravesham BC has confirmed its intentions to bring forward Chapter Farm as a development allocation in its Local Plan strategy. Releasing Green Belt in this location would have knock on impacts for the remaining Green Belt in Medway. The adjacent Medway Green Belt land in this location would not be performing the Green Belt function once land was developed in the Gravesham Green Belt area. Medway’s Green Belt Review confirms most parcels as grey belt and considers the sustainability of this location and better alignment with the Local Plan strategy significant enough to satisfy exceptional circumstances to release parts of this site that sits in the Green Belt”.*
- 3.3.4 Whilst it is welcomed that the site is grey belt and there are exceptional circumstances to release it from the Green Belt, the above statement is contradictory and infers that this area of the Medway Green Belt would only not perform the Green Belt function, once the land at Chapter Farm was developed.
- 3.3.5 This is contested and is not consistent with the findings of the Medway Green Belt Review which states that the site is *“moderately performing”* and *“this contribution is not considered significant and is therefore grey belt land”*.
- 3.3.6 Bellway consider that this site is deliverable, without the need for Chapter Farm to be released from the Green Belt/delivered. For completeness, the grey belt case is set out below.
- Grey Belt Policy*
- 3.3.7 The NPPF indicates that the development of homes, commercial and other development should not be regarded as inappropriate where:

- (a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- (b) There is a demonstrable unmet need for the type of development proposed;
- (c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework; and
- (d) Where applicable, the development meets the “Golden Rules” requirements set out in paragraphs 156 and 157.

3.3.8 The Glossary to the NPPF defines the grey belt as:

“Land in the Green Belt comprising previously developed land (PDL) and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in Framework paragraph 143. Grey belt excludes land where the application of policies relating to the areas or assets in Footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

3.3.9 Footnote 7 refers to NPPF policies relating to: habitat sites (and those sites listed in paragraph 194), and/or designated as Sites of Special Scientific Interest, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets and other heritage assets of archaeological interest referred to in Footnote 75; and areas at risk of flooding or coastal change.

3.3.10 Paragraph 143 sets out the five purposes of the Green Belt:

- (a) To check the unrestricted sprawl of large built-up areas;
- (b) To prevent neighbouring towns merging into one another;
- (c) To assist in safeguarding the countryside from encroachments;
- (d) To preserve the setting and the special character of historic towns; and
- (e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.3.11 Paragraph 156 states that where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made:

- (a) Affordable housing which reflects either: (i) development plan policies provided in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;
- (b) Necessary improvements to local or national infrastructure; and
- (c) The provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.

3.3.12 Paragraph 157 states that before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%.

3.3.13 Paragraph 158 states that a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.

Grey Belt Appraisal

3.3.14 Whilst a small part of the site has previously been used for parking and associated with commercial uses, the wider site would not fall under the NPPF's definition of Previously Developed Land (PDL).

3.3.15 To determine whether the site could be considered grey belt, it must pass the test of whether the land does not strongly contribute to the following Green Belt purposes:

- (a) To check the unrestricted sprawl of large built-up areas;
- (b) To prevent neighbouring towns merging into one another;
- (c) To preserve the setting and special character of historic towns.

3.3.16 Each of these is addressed in isolation below.

3.3.17 **Purpose a) Sprawl:** The NPPF does not define what might constitute sprawl, however, the Green Belt Assessment commissioned by Bellway and submitted alongside the Regulation 18b submission and appended to this representation, provides an assessment against this. The report provides an assessment of the wider Green Belt area, however, splits it into areas. This site is referred to as "Area D" within the report. Given that the site abuts the urban area and there is a new barrier of the Wainscott Bypass (since the Green Belt was designated), it could be considered that it contributes to purpose a in a minor way. The Assessment concludes that it only provides a **low** contribution to purpose a.

3.3.18 **Purpose b) Merging of Towns:** The latest published guidance from the Government is clear that this purpose relates only to towns and not villages. The nearest town from Strood is Gravesend. There is no inter-visibility between this site and Gravesend, due to the enclosure provided by intervening landforms, as detailed within the Green Belt Review report. Furthermore, although the Government guidance is clear that this purpose relates to towns and not villages, the submitted Green Belt Assessment also sets out that there is no inter-visibility, and a strong sense of separation between the site and the settlements of Higham, Shorne and Shorne Ridgeway. There are limited views to and from the site due to the sense of enclosure provided by intervening vegetation and buildings, however, where there are views, this is restricted to some glimpsed views to the rear of Dillywood Lane, due to the tree belt.

3.3.19 Based on the above, it is concluded that this site only plays a limited role in preventing the merging of towns and therefore provides a weak contribution to the separation between Gravesend and Strood. The report also concludes that the site provides a relatively weak contribution to the separation between Higham,

Shorne and Shorne Ridgeway and therefore an overall **weak** contribution to purpose b.

- 3.3.20 **Purpose d) Historic Towns:** The site does not contribute to purpose d. Medway Council's Green Belt Review (2018) assessed the wider Green Belt and discounted purpose d as there are no historic towns within the vicinity of the Green Belt. On the basis of this, the site has **no contribution** to purpose d.
- 3.3.21 On the basis of the above, it is considered that the site does not strongly contribute to the above 3 purposes of the Green Belt, which is supported by the submitted Green Belt Review.
- 3.3.22 Furthermore, it is also noted that the NPPF excludes land where the application of policies relating to areas or assets in Footnote 7 (other than Green Belt) would provide a 'strong' reason for refusal. This includes:
- Habitat sites and/or designated Sites of Special Scientific Interest;
 - Local Green Space;
 - A National Landscape;
 - A National Park (or with the Broads Authority) or defined as Heritage Coast;
 - Irreplaceable habitats;
 - Designated heritage assets (and other heritage assets of archaeological interest); and
 - Areas at risk of flooding.
- 3.3.23 The site would not impact any of the above-mentioned areas that would constitute a strong reason for refusing the development. It is therefore agreed that the site is grey belt land, and the site should therefore be assessed against Paragraph 155 of the NPPF, which states that development should not be regarded as inappropriate development in the Green Belt where:
- (a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - (b) There is a demonstrably unmet need for the type of development proposed;
 - (c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework; and
 - (d) Where applicable, the development meets the "Golden Rules" requirements set out in Framework paragraphs 156 and 157
- 3.3.24 Turning to criteria a) of Paragraph 155, it needs to be established whether the development would fundamentally undermine the purposes (when taken together) of the Green Belt. The site is bound to the north by the A289 which provides natural separation between the Medway and Gravesham settlements. As set out in the submitted Green Belt Review, the release of this area of Green Belt, would result in "moderate" harm, due to this natural separation. Furthermore, the site borders the currently defined settlement confines, development on this site would form a natural and logical extension, rather than encroachment into the countryside. The development of the site would not therefore fundamentally undermine the remaining Green Belt purposes.

- 3.3.25 In terms of criteria b, there is a clear unmet need for housing in Medway, which this site has been allocated to deliver 800 of these homes.
- 3.3.26 Criteria c relates to whether the development would be in a sustainable location with particular reference to paragraphs 110 and 115 of the Framework. The site adjoins the Strood settlement boundary and is in close proximity to Strood (1.6 miles) and Higham (2.6 miles) train stations, providing HS1 and other mainline train connections to London and the southeast. The site benefits from easy access to the strategic road network via the A2. The Social Infrastructure Audit, submitted alongside the Regulation 18b representation, demonstrates that the site is within a 5-minute walking distance of public transport (bus stops on Gravesend Road and Brompton Farm Road) that provide services into Strood District Centre. Therefore, it is considered that the site is well served by public transport and has the ability to improve bus connections to the site, given the scale of the proposed development at the site.
- 3.3.27 Criteria d requires developments to meet the 'Golden Rules' which are detailed in paragraphs 156 and 157 of the NPPF. The Golden Rules relate to contributions that should be made where development involving the provision of housing is proposed on land released from the Green Belt or on sites subject to a planning application.
- 3.3.28 Draft Policy T3 requires 30% affordable housing, therefore in accordance with the Golden Rules the proposal could deliver 45% affordable housing across the site.
- 3.3.29 Furthermore, the Golden Rules require the necessary improvements to local or national infrastructure and green spaces. This infrastructure has been reviewed as part of the evidence base and has already been determined by Medway Council.

Grey Belt Conclusion

- 3.3.30 As above, we consider the site to be grey belt, in accordance with conclusion of the Plan, however, would contest that the site is grey belt on the basis that Chapter Farm is developed. It is submitted that even if Chapter Farm were not to be developed, this site would be grey belt and could therefore come forward in isolation, without reliance of the development of land outside of Medway Council's jurisdiction.

Physical Separation

- 3.3.31 This site is physically well separated from the other sites within the allocation. Once a masterplan is prepared to show the infrastructure and sites can work cohesively, there are no physical boundaries or links to other parcels which would restrict this site coming forward as soon as possible.

Access

- 3.3.32 The draft masterplan set out within Policy SA6, proposes that the main access to the site is to be taken from Gravesend Road to the west, therefore does not rely on other land coming forward to implement this.
- 3.3.33 Therefore, there are no access reasons that would prevent the site coming forward in isolation.

Availability

- 3.3.34 Availability is essentially about confirming that it is financially viable to develop, and viability remains a central consideration throughout plan making. We can confirm that there would be no financial restrictions that would impact upon the viability of a housing led scheme or that would prohibit development coming through within the early stages of the plan period. The site is in the control of one of the biggest housebuilders in the country, Bellway, who have a proven track record of strong delivery rates within the southeast.

Suitability

- 3.3.35 For the reasons set out in this representation, this site is considered suitable for development, supported by its draft allocation. In summary, the site borders the currently defined town centre confines and would form a natural, logical and sustainable extension.

3.4 S106 DEVELOPER CONTRIBUTIONS

- 3.4.1 Criteria 18 of draft Policy SA6 refers to the necessity for Section 106 Agreements to secure the provision of financial contributions towards the provision of infrastructure, including additional primary school and secondary school places. It is also noted that given this is a grey belt site, the "Golden Rules" should be adhered to in relation to affordable housing, which equates to 45% in this instance.
- 3.4.2 Paragraph 58 of the NPPF sets out the tests in which apply when seeking planning obligations, in accordance with Regulation 122(2) of the Community Infrastructure Levy Regulations (2010):
- (a) Necessary to make the development acceptable in planning terms;
 - (b) Directly related to the development; and
 - (c) Fairly and reasonably related in scale and kind to the development.
- 3.4.3 Bellway raise concerns with the planning obligations sought. The 2021 Viability Report (dated July 2024) refers to developer's contributions of £12.7k per unit, however notes that this is not requested on all schemes. Paragraph 8.28 states that the average agreed amount on recently approved scheme is just below £10k per unit. As such, table 8.3 of the 2021 Viability Assessment assumes a figure of £5,628 per unit for Strood.
- 3.4.4 The 2025 Viability Update in Table 8.10 refers to developer's contributions of £17,789 per unit, again paragraph 8.129 acknowledges that these contributions are "not requested on all schemes – rather just where needed". Paragraph 8.130 states that in relation to strategic sites, the Council has an estimated strategic infrastructure and mitigation costs as set out in the table below. At the time of the Viability Update, MC were undertaking further transport modelling, which was completed in May 2025 and are now included in the costs. Table 8.11 within the Viability Assessment is shown below.

	UNIT:	AREA (HA):	S106 REQUIREMENT EXCLUDING HIGHWAY COSTS:	S106 REQUIREMENT FOR OFF-SITE HIGHWAY WORKS:	TOTAL S106:	£ PER UNIT:
Strood West	1,280	59.44	£27,028,480	£1,811,014	£28,829,494	£22,531

- 3.4.5 Paragraph 8.134 acknowledges the circa £5k per unit contribution in the 2021 report and states that this has been carried forward and a range of “higher costs” have also been tested. The Viability Assessment fails to specify what these higher costs include, beyond the off-site highway works. Furthermore, no evidence has been provided on the costings for off-site highway works, which is requested to be made available for examination.
- 3.4.6 With the off-site highway costs removed from the total contribution, this reduces the cost to circa £21k, however as set out above, further information is required as to what “higher costs” have been included in this.
- 3.4.7 Furthermore, Criteria 10 requires 2 primary schools and a secondary school, however the policy currently is not clear whether the expectation is to provide land for these only, or the infrastructure.
- 3.4.8 The expectation of these Section 106 contributions should be further evidenced and therefore “Justified” to make the plan “Sound”. As evidenced in the Council’s Housing Trajectory and within these representations, housing need is at its highest and the early delivery of this site is crucial to deliver housing, therefore Bellway would raise concerns with the significant contributions, with no evidenced justification.

3.5 PROPOSED POLICY CHANGES

- 3.5.1 To make the Plan “Sound” the changes identified in red below are necessary, reflective of the points discussed above.
- 3.5.2 In addition to the above, the Policy states within the “site specific information” table, that site SNF3 can deliver “up to 800 homes”, which implies a cap of 800 dwellings on the site. Paragraph 124 of the NPPF requires planning policies to promote an effect use of land in meeting the need for homes and other uses. Given the allocation is reliant on the preparation of a masterplan, the use of “up to” is restrictive and should be amended to allow for more flexibility, in response to the masterplanning process to ensure that the development capacity of the site is not restricted, and the policy is in accordance with the NPPF.
- 3.5.3 The table should therefore be amended to allow for “approximately 800 homes”.

Proposed Amended Policy SA6

- Land West of Strood together with Chapter Farm (Gravesham Borough Council), will provide a comprehensive cross border sustainable location for*

growth, with transitions between the urban edge of Strood and the Green Belt and maintains the identity of the rural settlement of Three Crutches.

2. *Medway Council will work collaboratively with Gravesham Borough Council to deliver this strategic cross border Green Belt site providing up to 4,000 new homes, two primary schools, an expansion of an existing primary school, a secondary school, 2 hectares of employment provision and a local centre, 2 football pitches and indoor sports provision*
3. *Will deliver up to 1,280 new Medway homes within the Plan Period:*
 - a. *The housing density must reflect the transition from urban to countryside ensuring densities are gradually lowered toward the countryside edges*
 - b. *The housing mix must be in compliance with The Local Housing Need Assessment and policy T2 in providing for the needs of the community*
 - c. *Affordable housing will be provided in accordance with the Golden Rules*
4. *Proposals shall demonstrate a landscape led approach, which takes account of:*
 - a. *The countryside context, key landscape characteristics, views, the significance of heritage assets and the setting of the Kent Downs National Landscaping.*
 - b. *The landscaping will be planted at an early stage of the development and provide new habitats for priority nature conservation species and be appropriate to landscape character.*
 - c. *a substantial buffer along the A289 is provided to enhance the transition into the Green Belt and provide a noise mitigation.*
5. *A Green-blue infrastructure strategy will shape placemaking by supporting the design and layout of proposals:*
 - a. *The development design will respond to its countryside setting, the landscape and topography*
 - b. *Maximise opportunities for provision of high quality and publicly accessible multi-functional green-blue infrastructure, biodiversity enhancements and SuDS*
 - c. *It will deliver on:*
 - i. *environmental gains Biodiversity Net Gain (10% minimum)*
 - ii. *and ecological enhancements in line with the Local Nature Recovery Strategy priorities.*
6. *The design and layout of streets will follow a legible hierarchy for maximum bus accessibility and pedestrian movement:*

- a. *The primary access points will be taken off Gravesend Road, the A2 (Watling Street) and Stone Horse Lane to provide the main through routes.*
 - b. *Multi-modal access will be facilitated by lower order roads*
 - c. *Old Watling Street, Crutches Lane and Strodes Close will be improved to support walking and cycling access*
7. *Proposals will encourage sustainable habits and ensure a strong sense of place by delivering a connected development informed by a strategic access strategy, which will:*
 - a. *prioritise active travel, well designed parking solutions and multimodal access into and out of the site supported by an integrated public transport and cycle/mobility hub with a reliable and frequent bus service and cycle/mobility hub*
 - b. *Opportunities to establish a reliable and frequent bus service must include the exploration of Fast Track to serve the area west of Gravesend Road.*
 - c. *Explore the opportunity to widen and segregate cycle route NC177 in the provision of a walking and cycling network*
 - d. *Provide attractive walking and cycling links between the existing Strood District Centre, the new development and the surrounding countryside including linkages with NNRs and LNRs, other destinations and points of interest.*
8. *Proposals for the area to the west of Gravesend Road shall have regard for the heritage significance of Chapter Farm and its setting. Proposals shall ensure that the historic administrative boundary is protected and enhanced.*
9. *The co-location of uses will provide an attractive location for investment and support convenience, accessibility and sustainability.*
 - a. *Provision of a local centre is preferred centrally on the western side of Gravesend Road. This centre will include convenience retail to meet the day to day needs of residents, complementary retail and community uses (use classes Eb-Ef, F2) and an active travel cycle/mobility hub.*
 - b. *2 hectares of employment provision co-located with the centre on the western side of Gravesend Road, providing flexibility to accommodate commercial uses serving the local community (use Classes Eb-Eg, F2).*
 - c. *Provision must be of appropriate scale, format and type that is sensitive to the countryside location and provides an appropriate response to the setting of the Kent Downs National Landscape*
 - d. *Development will be set within green infrastructure and appropriate connections through segregated walking and cycling routes, bus linkages.*

10. *The development will provide for new education facilities in accordance with the latest IDP:*

- a. two two-form entry primary schools*
- b. An expansion of one-form entry to Temple Hill Primary school*
- c. an eight-form entry secondary school*

Consideration will be given to efficient use of land in the delivery of an allthrough school, which would include a three-form entry primary school plus an eight-form entry secondary school.

11. *New open space and playing pitches will be provided in accordance with the Fields in Trust (FIT) standards as set out in policy DM21. Allotment provision will be required at a standard of 0.25ha/1000 people.*

- a. The development will incorporate publicly accessible, well-managed and high quality open spaces, which are linked to the open countryside and adjoining settlements.*
- b. Provision will include two football pitches (one of which must be 3G) with associated changing room facilities, which can be co-located with the education infrastructure.*
- c. Proposals will provide a replacement indoor sports facility.*
- d. There is an opportunity to co-locate or include the sports pitches and indoor sports facility within the schools. A Community Use Agreement with a new Primary or Secondary schools would help to ensure access to sports infrastructure and a more efficient use of land.*

12. *The applicants for sites SNF1, SNF3 and SR5 will collaborate to produce a landscape-led masterplan, to be approved by Medway Council and Gravesham Borough Council to guide subsequent planning applications and further approval of details.*

13. *A comprehensive approach to site development will be expected, informed by an approved master plan, which demonstrates how the policy and infrastructure requirements set out in the respective plans relating to the site as whole, with a phasing plan, will be achieved.*

14. *To ensure a continuous supply of housing throughout the Plan period, the Council will support an early phase delivery of housing, independent of the masterplan, where it does not prejudice the implementation of the site as a whole.*

15. *Preparation of an infrastructure delivery plan / phasing plan*

16. *Development shall be phased broadly instep with infrastructure delivery plan and phasing plan*

17. *Any application for development on part of the site shall accord with the approved masterplan and shall not prejudice the implementation of the site as a whole.*

- 18. Delivery will be secured through a legal agreement.*
- 19. S106 – provision of financial contributions towards the provision of infrastructure, including additional primary and secondary school places in accordance with the latest IDP.*
- 20. An access strategy must be informed by audits into Strood District Centre and other destination points like supermarkets etc..*

4 DUTY TO COOPERATE

- 4.1.1 Section 33A of the Planning & Compulsory Purchase Act requires Councils to engage constructively, actively and on an on-going basis with neighbouring authorities and certain statutory bodies regarding strategic matters during the Plan preparation.
- 4.1.2 The Council's "Duty to Cooperate Statement" dated June 2025, provides details of the activities undertaken to date with Gravesham Borough Council in respect of the Land West of Strood.
- 4.1.3 Paragraph 28 of the NPPF requires Councils to "prepare and maintain one or more statements of common ground, documenting cross boundary matters being addressed and their progress in cooperating to address these".
- 4.1.4 At this time, as set out Section 1.4 of the Duty to Cooperate Statement, the Council still anticipates to agree a final composite statement of common ground (SoCG) with strategic bodies, which includes Gravesham Borough Council, alongside three other Local Authorities and five statutory consultees. This is therefore incomplete.
- 4.1.5 A Statement of Common Ground with Gravesham Borough Council is key for this site to come forward and also key to ensuring the Local Plan is "Sound." There is currently only one SoCG with Kent County Council which relates to matters of waste and minerals, which leaves a number of matters yet to be agreed/resolved, including infrastructure. Policy SA6 requires the cross-boundary delivery of housing and a number of infrastructure requirements, including schools, employment uses, and retail uses alongside Gravesham Borough Council. With no SoCG with Gravesham Borough Council (and indeed any other Local Authority) it is currently unclear whether these matters are agreed.
- 4.1.6 The Plan has therefore not fulfilled its statutory duty under Section 33A of the Planning and Compulsory Purchase Act, nor is it "Consistent with National Policy" and therefore is not "Positively Prepared".
- 4.1.7 The missing Statement of Common Ground should be made available for consultation before proceeding to examination.

5 OTHER POLICIES

- 5.1.1 This following section considers other development control policies and identifies those which as drafted are not currently “Sound” and require amendments.

5.2 POLICY DM5: HOUSING DESIGN

- 5.2.1 No objection in principle is raised in respect of Policy DM5, however the wording of the policy should be amended. The requirement for “dementia friendly standards” is not specific and is already included in Policy T4 and Bellway would raise concerns regarding its inclusion. The requirement for M4 dwellings (Building Regulations) can be included as a standalone policy or within Policy T2 (Housing Mix), as this allows for dwellings which are adaptable to various living situations.

- 5.2.2 The Policy as drafted is therefore not “Consistent with National Policy”. Paragraph 16(d) of the NPPF requires plans to contain policies that are clearly written and unambiguous and 16(f) states that policies should serve a clear purpose, avoiding unnecessary duplication.

- 5.2.3 It is proposed that the policy is amended as follows:

New housing developments must provide good, healthy living conditions for occupants with high quality, robust, adaptable housing, inclusive and functional spaces that respond to changing resident’s needs throughout their lives and support the undertaking of necessary day to day activities.

All new accommodation must, in addition to the design and amenity policy above (T1):

- *As a minimum meet the relevant nationally described internal space standards for each individual unit.*
- *As a minimum meet the Medway Housing Design Standards for external spaces including shared outdoor amenity space, shared access and circulation, cycle storage amenity space, shared access and circulation, cycle storage, refuse and recycling, management, visual privacy and private outdoor space, environmental comfort.*
- ~~*Incorporate dementia friendly standards where appropriate.*~~
- *As a minimum requirement, the provision of sufficient natural light must be met to satisfy healthy living standards:*
 - *Single aspect facing homes shall be avoided where possible*
 - *Demonstrate use of up-to-date British Standards methodologies.*
- *Provide a convenient and efficient layout, including sufficient circulation space and avoiding awkward or impractically shaped rooms, unless there is justification for doing so on the basis of significant design quality gain.*
- *Demonstrate sufficient space for storage and clothes drying.*

- *Be informed by contextual analysis of key character traits that contribute to local distinctiveness. Demonstrate well-defined character areas which individually and collectively create a strong sense of place and as a whole presents development that is clearly differentiated from other places across Medway.*
- *Provide for recycling and refuse storage to maximise recycling but without a detrimental impact to the street scene or character of an area.*
- *Be flexible towards future adaptation in response to changing life needs.*

5.3 POLICY DM6: SUSTAINABLE DESIGN AND CONSTRUCTION

5.3.1 No objection to the principle of Policy DM6 is raised, however bullet point 6 is already covered by Policy S1 and should therefore be removed and not repeated, to be "Consistent with National Policy" (paragraph 16(f) of the NPPF). Furthermore, this is also now superseded by Building Regulations.

5.3.2 It is proposed to amend the policy as follows:

- *Where relevant, how proposals adhere to Building for a Healthy Life.*
- *Use of sustainability criteria, such as Building with Nature Standards which define "what good looks like" covering the themes of wellbeing, water and wildlife and other references.*
- *The use of natural features such as green walls/roofs/hedges/roof top gardens etc. to enhance sustainability and Biodiversity Net Gain and contribute to the health and wellbeing of residents.*
- *Design principles founded on locally sourced and/or recycled materials where possible.*
- *That new dwellings built to ensure that wholesome water consumption is not greater than 110 litres/person/day.*
- ~~*Details of how the proposal is seeking to address the climate emergency with an aim to achieve or aspire to net-zero carbon with due regard to Medway's current Climate Action Plan and Medway Council Corporate Strategies. The whole life cycle of a building should be considered. Where possible proposals for conversion or reuse of buildings will be favoured.*~~
- *That the inclusion within any planning application, details how the proposals will address matters of sustainability through the design, construction and operation phases via design considerations and submission of a construction management plan.*
- *Creation of a safe environment including but not limited to during the operational phase of the development but also ensures full remediation of brownfield sites to appropriate standards for re-use.*

Where appropriate and technically and financially viable, any submission must demonstrate how it will meet a very good BREEAM standard for water and energy for non-residential development proposals.

5.4 POLICY T2: HOUSING MIX

5.4.1 This policy is supported in principle, however reference to the need for self-build plots is dealt with as its own policy at Policy T9, therefore should be removed.

5.4.2 The policy should be re-worded as follows:

The Council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of a growing and changing population. Residential development will only be permitted if it encourages a sustainable mix of housing that includes an appropriate range of house types, including bungalows, and sizes to address local requirements, as evidenced through the Medway Local Housing Needs Assessment, or updated reports and studies.

The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.

Accommodation requirement as detailed in the latest Local Housing Need Assessment will be used to help inform which house sizes and mix should be delivered in key locations in urban and rural areas to meet the objectively assessed needs of Medway as detailed in the latest evidence.

In relation to affordable housing, the Council will require developers to provide details of how this evidence has been used to justify the proposed mix.

Where affordable housing is to be provided, developers should also take into consideration the needs of households on the Council's housing register and discuss affordable housing requirements with the Council's Housing Strategy team at the pre-application stage of the planning process.

Development schemes must demonstrate that as part of the housing mix, sufficient consideration has been given to:

older persons housing need, (particularly for downsizing);

~~*custom and self-build plots.*~~

The criteria outlined in policy T4 and T9 needs to be observed.

5.5 POLICY T3: AFFORDABLE HOUSING

5.5.1 Policy T3 currently specifies the different affordable housing thresholds depending on where the site is located. It however does not currently include the different affordable tenures required for developments. The NPPF at Paragraph 64 is clear that planning policies should specify the type of affordable housing required, including the minimum proportion of Social Rented Homes.

- 5.5.2 The Policy therefore fails to be “Consistent with National Policy” and therefore must be amended to include the tenure split.
- 5.5.3 Additionally, it is noted that the policy also required affordable housing provision to reflect the need for affordable accommodation for older persons and those with specialised needs. This may not be viable or practical for developments, depending on their size, therefore the policy should be amended to reflect this, and ensure the policy is “Effective”.

"Where practicable to do so, reflect the need for affordable accommodation for older persons and those with specialist needs, in line with the tenure and size split requirements as detailed in the latest Local Housing Need Assessment."

6 CONCLUSION

- 6.1.1 These representations have been prepared on behalf of Bellway Strategic Land in response to Medway Council's Local Plan Regulation 19.
- 6.1.2 Bellway controls the "Land at Brompton Farm", proposed allocation Policy SA3 (Site SNF3) for a residential-led development, alongside Gravesham Borough Council.
- 6.1.3 Bellway strongly supports the allocation of the Site, to release Green Belt land based on significant housing need, which forms a logical urban extension to Strood, however objects to the need to deliver this "cross-boundary" with reliance on landowners within different Borough, with different Local Plan timeframes.
- 6.1.4 These representations therefore demonstrate that this Site can come forward in isolation and is suitable, deliverable and available in its own right, or alongside BDW Homes and Brookworth Homes, who control the remaining land within MC's boundary.
- 6.1.5 The reliance on a joint masterplan with no certainty of Gravesham's Local Plan coming forward is not "Justified" and therefore amendments are made to Policy SA6 to make the policy "Sound", to allow the homes identified in the Housing Trajectory to come forward in the early years of the plan.
- 6.1.6 Notwithstanding this, Bellway remain fully committed to collaborating and having a masterplan in place on adoption of the Plan.
- 6.1.7 Minor comments and amendments have also been made in respect of policies DM5, DM6, T2 and T3, to make them "Consistent with National Policy" and thus "Sound".
- 6.1.8 It is reiterated that Bellway raise no objections to the overall spatial strategy, Green Belt release and site allocation.

APPENDIX 1

planning
transport
design
environment
infrastructure
land

Medway Council Regulation 18 Consultation Response

Brompton Farm, Strood

LAA REF: SNF3
OPUS SUBMISSION FORM REF: 292
RESPONDENT ID REF: 365
REGULATION 18a SUBMISSION ID:1690
REGULATION 18b SUBMISSION ID:2899

CLIENT: BELLWAY HOMES LTD

SEPTEMBER 2024
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1 INTRODUCTION

1.1 PURPOSE OF THE STATEMENT

Overview

- 1.1.1 These representations have been prepared on behalf of Bellway Homes in response to Medway Council's (MC) Local Plan 2041 Regulation 18 consultation document (July 2024). The consultation is a statement of MC's commitment to adopting a new Local Plan in place for the period 2026-2041 (15 yrs) and seeks to provide certainty on the direction of Medway's growth.
- 1.1.2 Land at Brompton Farm, Stood (hereafter referred to as 'the site') has previously been promoted by Bellway Homes at various consultation exercises run by MC, including the previous Regulation 18 consultation in October 2023 and Call for Sites exercises.
- 1.1.3 This submission relates on online submission **ID: 2899**.

Plan Context

- 1.1.4 This consultation is MC's second Regulation 18 consultation (known hereafter as the Regulation 18b consultation). The consultation runs from 15 July to 08 September 2024.
- 1.1.5 This consultation builds upon the previous Regulation 18 consultation, which was done at a very high level and did not include any preferred strategy for growth. It provided options for growth within the background of an identified housing requirement and a draft "Vision" and "Strategic Objectives".
- 1.1.6 The current consultation provides an updated vision, strategic objectives, and an overview of the Strategic Growth Options available to the Council (including their preferred strategic growth option), draft planning policies and policy maps (showing indicative site allocations for residential-lead development and employment-lead development).
- 1.1.7 The Local Plan consultation document provides a list of 44 questions relating to all 13 chapters of the Regulation 18b consultation.
- 1.1.8 The Council's Local Development Scheme (February 2024) anticipates the Council publishing the Regulation 19 Draft Local Plan in January 2025 for comment.

- 1.1.9 The primary intention of this representation is to address why land at Brompton Farm Strood (SNF3) should be included as a draft allocation in the Regulation 19 after the Interim Sustainability Appraisal rejected the allocation of the site as part of the earlier Regulation 18 consultation process in October 2023.
- 1.1.10 This representation submits that the site remains available, deliverable, and achievable within the forthcoming Plan period. It is submitted that the site is sustainable and logical to come forward for development and were it not in the Green Belt it is considered it would have been brought forward for development many years ago. There is no evidence-led basis upon which the site cannot be allocated as part of the forthcoming Regulation 19 Local Plan to help meet the housing needs of MC and the wider subregion.
- 1.1.11 These representations must be read alongside the completed online form.

Draft NPPF Consultation and Written Ministerial Statement

- 1.1.12 The Government's proposed reforms to the NPPF (amongst other changes to the Planning System) were unveiled on 30th July 2024 with the publishing of the draft NPPF which will be consulted upon until 24th September 2024. In light of this, given the Labour Government's manifesto and the Housing Secretary's recent Written Ministerial Statement, it seems likely that most of the proposed changes will be published in an updated version of the NPPF shortly after the closure of the consultation.
- 1.1.13 The draft NPPF was accompanied by a WMS titled 'Building the homes we need', which sets out how the Government is seeking to encourage housebuilding. The WMS sits alongside the draft NPPF and provides specific planning mechanisms to encourage housebuilding and removes exceptions to the application of the presumption, including the removal of Paragraph 226 (i.e., the 4 Year Housing Land Supply exception). Under the revised NPPF, the threshold for the application of the presumption will return to the 5 Year HLS requirement (as well as the Housing Delivery Test requirement).
- 1.1.14 Within the WMS, the Housing Secretary is clear that the 'Standard Method' currently utilised is *"insufficient to deliver on our scale of ambition"* and is *"not up to the job"*, therefore the Government have proposed a 'Revised Method' which requires Local Authorities to plan for numbers of homes that are proportionate to the size of existing housing stock. In this regard, MC under the Standard Method are required to deliver 1,658 dwellings per annum, whereas under the Revised Method, they are required to deliver 1,644 dwellings per annum. This stands as a decrease in the requirement by 14 dwellings, which is not considered to be significant reduction considering the overall total number of dwellings MC require to deliver per annum.

- 1.1.15 In regards to the Green Belt the Government are also considering making changes to allow development in the green belt to come forward to meet the housing needs if the site offers limited contribution to the Green Belt's purposes defined at para 143. This includes the introduction of Grey Belt which is defined as:

***Grey belt:** For the purposes of Plan-making and decision-making, grey belt is defined as land in the Green Belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework) but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).*

1.2 STRUCTURE OF THE REPRESENTATION

- 1.2.1 Below is an overview of the structure of the remainder of the consultation response:

- **Chapter 2** - Provides an overview of the site promoted (Green Belt release at Brompton Farm Strood) once again setting out the reasons why the site should be reconsidered for an allocation;
- **Chapter 3** - Provides a response to the draft Local Plan and the consultation questionnaire with regards to the vision and strategic options.
- **Chapter 4** - Provides a response to the Council's preferred Spatial Growth Option.
- **Chapter 5** - Sets out a response to policy around the Natural Environment.
- **Chapter 6** - Sets out a response to policy around the Built Environment.
- **Chapter 7** - Sets out a response to policy around Housing.
- **Chapter 8** - Forms the overall summary and conclusions.

- 1.3.1 Each section includes a "summary", which forms the basis of our response on the online form/platform.

2 THE SITE AND ITS CREDENTIALS

2.1 CASE FOR ALLOCATION

- 2.1.1 Bellway Homes has continued to promote site SNF3 for Green Belt release throughout MC's previous Regulation 18 consultations and Call for Site exercises to date. It is promoted to provide a sustainable, strategic urban extension of Strood comprising market and affordable housing, and infrastructure which could include public open space, playing fields, a school, and a medical/neighbourhood centre.
- 2.1.2 The site comprises 44.6ha of Greenfield land in the Green Belt between Brompton Farm Road to the south and Hasted Road (the A289) to the north and Gravesend Road to the west.
- 2.1.3 The site abuts the urban confines of Strood where residential dwellings associated with Brompton Farm Road is located.
- 2.1.4 An Illustrative Masterplan, included in the Vision document, from the site SNF3 (**Appendix 5**) supports the submission and shows how the development could come forward. This has been based on the following opportunities below (shown on Figure 5.1):
- Potential new vehicular access into the site from Gravesend Road and a secondary access from Strodes Close;
 - Retention of the existing Public Rights of Way (PROW) network across the site and the creation of further pedestrian and cycle links within the site to increase permeability and access to the countryside north of the A289;
 - The creation of a self-contained neighbourhood with its own identity and a strong sense of place;
 - The provision of a good quality public realm with extensive areas of open space including woodlands, wildflower meadows, a community orchard and green fingers;
 - The provision of a neighbourhood centre with small retail units and a medical hub to serve the new community;
 - Potential provision of a school to serve the new neighbourhood and surrounding areas;

- Ecological benefits through the provision of woodland and pond habitats and green corridors through the development; and
- Opportunities for play and exercise including areas of linked open space with a variety for play opportunities and a fitness trail with exercise stations.

Insert new masterplan image

Adjacent sites

- 2.1.5 Bellway consider that site SNF3 is deliverable in its own right as a stand alone allocation in order to help meet the housing needs required in the Local Plan and is available, sustainable and deliverable.
- 2.1.6 We are also aware and have communicated with the promoters or developers of adjacent sites. These parties are also submitting their own representations to promote their land for allocation. These sites are shown on the illustrative masterplan in **Appendix 4**. Within the Medway Council boundary this includes Brookworth Homes to the east and BDW Homes to the west.
- 2.1.7 Whilst we consider that site SNF3 is deliverable in its own right, we have worked with these two parties to demonstrate a coordinated approach can be achieved were the Council to also include these two sites. This has included a joint masterplan which has now included the wider area of BDW and Brookworth land. Were the Council to allocate all three sites in the Regulation 19 Plan we can confirm that the parties have worked together, cooperated and will be able to continue to do so in order to achieve a coordinated and masterplanned approach.
- 2.1.8 As the sites lie on the boundary of Gravesham Borough Council, we have also considered the wider area. In the last published version of the Gravesham BC draft Local Plan they have identified allocating significant residential housing growth on the boundary with Medway. This land has been promoted by The Church Commissioners (CC). Discussions have been held with Bellway/BDW and The Church Commissioners and the masterplan at **Appendix 4** reflects how the area could look if that site too were taken forward in the Gravesham Local Plan.
- 2.1.9 Bellway consider that they do not need The Church Commissioners (CC) land to be allocated by Gravesham BC in order to make their land either logical, sustainable or deliverable. However, if Gravesham BC were to move forward with their plan including this site (and it has been in the latest plan for over 4 years) it would render the Bellway/BDW/Brookworth land illogical not to also include for development.

- 2.1.10 The key factor with all of these sites coming forward for release from the Green Belt is that the Brasted Rd A289 has been developed since the Green Belt has been designated. This brings a physical barrier to the north and acts as the strong protection to prevent the settlements of Higham and Strood merging. The Bellway site on its own would have limited or no impact on settlements merging.
- 2.1.11 As has been stated above Bellway consider that site SNF3 is deliverable in its own right and does not require BDW/Brookworth or CC land to come forward to make it acceptable. However, were BDW and Brookworth also allocated by Medway we have demonstrated how this could work and the cooperation to date. Likewise, were Gravesham BC to allocate the CC land, the masterplan shows how it could work and contact has been made between the parties to deliver a coordinated approach.

Green Belt

- 2.1.12 Bellway commissioned an independent Green Belt Study (*Appendix 3*) to assess the site against the 5 Green Belt Purposes. This study has identified that this land makes a Relatively Weak contribution to Green Belt Purpose 2 in relation to the separation between Strood and the inset settlements of Higham, Shorne and Shorne Ridgeway and a Limited contribution to Purposes 1 and 3. It makes no contribution to Purposes 4 and 5.
- 2.1.13 It is considered that the Development would not result in any material harm to the Green Belt purposes of prevent neighbouring towns merging into one another (Purpose 2), preserving the setting and special character of historic towns (Purpose 4) or assisting in urban regeneration by encouraging the recycling of derelict and other urban land' (Purpose 5). Whilst the development would result in some harm to the Green Belt purposes of preventing sprawl of the built-up area and encroachment upon the countryside, this harm would be mitigated by the masterplanning proposals and associated compensatory improvements to the Green Belt.
- 2.1.14 Paragraph 150 of the NPPF requires that once Green Belts have been defined, local planning authorities "*should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity*". The Indicative Master Plan demonstrates the potential to create new, publicly-accessible open space. This would incorporate new woodland, allotments, children's play facilities and formal sports provision, all of which would be available for use by both existing and future residents. The proposed open space also provides the opportunity to deliver enhanced biodiversity, enhanced habitats and enhanced connectivity in the local landscape with new or enhanced walking and cycle routes between Brompton Farm Road and Dillywood Lane and between Gravesend Road and Dillywood Lane.

- 2.1.15 This study has concluded that the release of the site from the Green Belt would result in an overall limited level of harm to the Green Belt based on its limited contribution to Green Belt purposes and minimal effects on the adjacent Green Belt land north of Dillywood Lane and the A289. Development at Broomhill Rise would not reduce the residual adjacent Green Belt to the extent that it would no longer effectively function as Green Belt land.
- 2.1.16 The release of this Green Belt land should be considered in the context of the NPPF Consultation Draft published on 30 July 2024, which states that "Where it is necessary to release Green Belt land for development, plans should give first consideration to previously developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations." Grey belt land includes "areas of Green Belt land that make a *limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework)*".
- 2.1.17 Land at Broomhill Rise is considered to make no more than a limited contribution to the five Green Belt purposes.

Highways and Access

- 2.1.18 For more information of the Highways network, capacity and accessibility please see **Appendix 2**.
- 2.1.19 A pair of bus stops are located on Gravesend Road, approximately 130m (or a 1 to 2 minute walk) from the proposed principal vehicular access. A further pair of bus stops are present on Brompton Farm Road approximately 42m (or a 1 minute walk) from the proposed secondary access. The bus routes and frequencies are shown in Tables 1 and 2.

Service No	Route	Weekday	Saturday	Sunday
190	Gravesend – Chatham	2 – 3 per hour	2 – 3 per hour	1 per hour
668	Chalk – Grammar Schools	1.4	19	4
694	Higham – Grammar Schools	1.6	20	6

TABLE 1 : BUS SERVICES AVAILABLE ON GRAVESEND ROAD

Service No	Route	Weekday	Saturday	Sunday
172	Wainscott – Strood – Chatham	3 per day	No service	No service
633	Cliffe – Grammar Schools	School service	No Service	No service
673	Cuxton – Hoo Academy	School service	No service	No service
689	Darnley Arch – Hundred of Hoo Academy	School service	No service	No service
694	Higham – Grammar Schools	School service	No service	No service

TABLE 2: BUS SERVICES AVAILABLE FROM BROMPTON FARM ROAD

- 2.1.20 The nearest railway station to the site is Strood, which is located approximately 2.0km (representing a 26 minute walk or a 9 minute cycle) from the proposed secondary site access on Strodes Close. This station is afforded disabled parking, step-free access and cycle storage in the form of covered Sheffield stands for 40 cycles. Table 3 lists the direct train services that are available from this station along with their weekday and weekend frequencies. The station operates services to Rainham, Faversham, Luton, St Pancras International and Tonbridge amongst others.

Service	Weekday	Saturdays	Sundays
Luton via London Blackfriars	2 per hour	2 per hour	No direct service
Ramsgate	1 per hour	1 per hour	1 per hour
Rainham	4 per hour	3 per hour	3 per hour
Paddock Wood	2 per hour	2 per hour	1 per hour
London St Pancras International	4 per hour	3 per hour	3 per hour

TABLE 3: DIRECT TRAIN SERVICES FROM STROOD RAILWAY STATION

Sustainability of the location, including social Infrastructure

- 2.1.21 The site abuts the urban confines of Strood, a tier two settlement (District Centre) in the proposed settlement hierarchy (See Draft Policy S 16 of the Draft Local Plan). Strood provides essential services and community uses to support sustainable living and create efficiencies in linked trips. Given the locality of the site with its proximity to Strood, on the edge of the existing urban area, and access to the strategic road network and mainline railway stations the site, whilst being in the Green Belt, provides an attractive opportunity for the following (as identified on the illustrative masterplan of the site (*Appendix 5*):
- 2.1.22 The illustrative masterplan provides opportunities for future allocation to enhance the site's sustainable location through the delivery of residential let mixed use development of 800 homes and:
- Up to 17 hectares of accessible Open Space;
 - Extensive pedestrian and cycle routes;
 - Retention of existing Public Right of Way network;
 - High quality public realm;

- Children's play areas;
- Fitness Trail;
- Community orchards and allotments;
- Small retail units;
- A medical hub;
- A new school;
- New meadow, wooded and wet habitat areas; and
- New homes including affordable provision and self-build options.

- 2.1.23 To assist **Appendix 5**, a Social Impacts Audit (SIA) (**Appendix 1**) has been undertaken by DHA. The SIA evaluates the availability, accessibility, and quality of community facilities and services in a particular area and summarises how the proposal at site SNF 3 relates to and seeks to contribute to them. Section 4 of the SIA deals with Social Infrastructure, including demand for new schools.
- 2.1.24 The SIA concluded that due to the scale of the proposed allocation at site SNF3 (800), a school is highly likely to be required. Depending on updated housing targets set by the government as part of the NPPF consultation (July 2024), a new school may be justifiable if targets are increased, and more houses are delivered. It is considered that an allocation of 800 homes would increase the population by 200 primary school-age pupils. This triggers the threshold for the provision of a new primary school.
- 2.1.25 It is noted that the indicative masterplan identifies a location for a medical hub. The SIA confirms access to healthcare services such as GPs, pharmacies, and dental practices requires improvement in the local area. Given the above, the SIA sets out that there is scope to incorporate a GP surgery as part of the proposed development. Whilst the provision of pharmacies in Medway is overall sufficient, and there are dental practices located near the site, they could be considered as part of proposals for the site to create a "health hub". The initial masterplan shows an indicative location for a medical hub. It is considered that GP surgery, pharmacy and dental care could potentially form part of this up to serve existing and new residents in this part of Strood.
- 2.1.26 The SIA also assesses convenience and retail infrastructure in section 4.7 and concludes that a convenience store part of the proposed development would be ideally located to serve the circa 800 new homes as part of the proposed allocation of site SNF3. It also sets out that there are sufficient pubs and restaurants to meet local needs, and as such, this provision will not be required.

- 2.1.27 The indicative masterplan shows how the site can deliver a small retail offering, which could be a convenience store, to meet this identified need in the SIA.

2.2 OTHER CONSIDERATIONS

Trees

- 2.2.1 Trees and hedgerows lie within and around the edge of the submission site. None of these are subject to a Tree Preservation Order. Any future application would be accompanied by necessary Arboricultural Surveys with existing trees and hedgerows retained where possible. Therefore, this is not a development constraint.

Public Rights of Way

- 2.2.2 Two Public Rights of Way cross the site. These can be incorporated into the site without constraining development potential, as demonstrated by the accompanying illustrative masterplan.

Flood Risk

- 2.2.3 The site lies within Flood Zone 1 and is therefore not at risk of flooding.

Contamination

- 2.2.4 The site is a greenfield site and is not considered to have a likely presence for contamination and this would therefore not constrain development.

Archaeology and heritage

- 2.2.5 There are no known heritage assets within or adjacent to the application site. The site is not known to have a presence for archaeology. Mitigation measures and/or a watching brief for any potential archaeological finds can be secured by condition if the Council consider this appropriate at any future planning application stage of development.

Noise and air quality

- 2.2.6 The site is not within an Air Quality Management Area and so this is not considered to present a constraint. Any noise or air quality related constraints can be addressed through the master planning process of the development.

Agricultural land value

- 2.2.7 Medway have previously considered the site is best and most versatile agricultural land. This is disputed through the historic uses on the site. Given the need for housing in Medway and the sustainable nature of site SNF3, it is considered to outweigh any current concerns BMV land. An agricultural land classification assessment can be submitted to support the application to demonstrate the site is not BMV land as defined by Annex 2 of the NPPF.

Deliverability

- 2.2.8 For sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.

Availability

- 2.2.9 Availability is essentially about confirming that it is financially viable to develop and viability remains a central consideration throughout plan making. We can confirm that there would be no financial restrictions that would impact upon the viability of a housing led scheme or that would prohibit development coming through within the early stages of the plan period. The site is in the control of one of the biggest housebuilders in the country Bellway Homes.

Suitability

- 2.2.10 For reasons set out in this representation below, site SFN3 is considered suitable for development. In summary, the site borders the currently defined town centre confines and would form a natural, logical and sustainable extension.
- 2.2.11 Residential development on this site would make a useful contribution to the required housing supply for the plan period for Medway given that it also needs to help meet the needs of Gravesham BC.
- 2.2.12 Finally, the site is not constrained by access and infrastructure (as demonstrated in **Appendix 2** – Transport Technical Note and indicative access drawings), flood risk, pollution or contamination.

Achievability

- 2.2.13 The site is in two separate ownerships. However, the site is a predominantly green field with limited constraints other than those that cannot, or have already been, proposed to be mitigated as shown on the accompanying illustrative masterplan. The legal agreements and covenants would not prohibit the ability to bring forward the site. Therefore, the site is greenfield development in a sustainable location that can be delivered (started) within the early years (years 1-5) of the plan period.

2.3 COMMENTARY ON THE INTERIM SUSTAINABILITY APPRAISAL OF THE DRAFT LOCAL PLAN

- 2.3.1 Volume 1 of the interim sustainability appraisal at table 8.14 outlines reasons for the selection and rejection of reasonable alternative strategic sites for the Draft Local Plan. Our client's site SNF3 has been rejected as part of the reasonable alternative sites. The reasons set out by the council were due to:

- (1) The loss of BMV agricultural land.
- (2) Within the Green Belt- the development could lead to coalescence between settlements; and
- (3) Beyond reasonable walking distance to current public transport services.

Loss of BMV Land

- 2.3.2 It is noted that the Council cited the loss of BMV land as a reason why the site was rejected as part of the interim sustainability appraisal. The Natural England agricultural land classification maps for London and the southeast are high-level maps that provide an indication of where the best and most versatile land lies within the region. It is noted that the site is shown on the Natural England maps to be a location where Grade 1 land can be found. We consider that the Council is over-reliant on the Natural England maps as part of its evidence.
- 2.3.3 The findings of this are, however, questioned, particularly as part of the land has historically been used for non-agricultural uses, including car parking and other commercial purposes. In this respect, there are numerous concrete pads from former buildings on the site, and in places, rubble to a depth of several feet. This means that some of the land cannot be used for agricultural purposes as machinery cannot be deployed due to the amount of debris below. The only way the Grade of BMV land can be understood is through an Agricultural Land Classification Report, which can be submitted with any detailed planning application.

- 2.3.4 Given that MC's preferred SGO (Blended Strategy) under delivers the 28,000 homes required to meet its Local Housing Need, the release of Green Belt sites, even on BMV land, needs to be weighed in the planning balance. Therefore, at this stage of the development of the Local Plan, such sites cannot be fully ruled out as part of the interim Sustainability Appraisal.

Green Belt Coalescence

- 2.3.5 The Green Belt Study **Appendix 3** assess the site SNF3 against the five purposes of the Green Belt in paragraph 143 of the NPPF (formally paragraph 139), including part a) to check the unrestricted sprawl of large built-up areas. This is summarised in 2.1.12 – 2.1.17 above. The assessment is clear and sets out that the site is on the urban edge of Strood where the Green Belts openness is impinged on by the A289 and provides a physical barrier restricting/ limiting the growth of the urban area of Strood. Therefore, it is considered that MC have not fully considered the extent of the physical barriers to development within this part of the authority which can check the unrestricted sprawl of large built-up areas and that prevent neighbouring towns merging into one another.
- 2.3.6 The Council should re-evaluate site SNF3 against the five purposes of the Green Belt in paragraph 140 of the NPPF, reconsidering the physical infrastructure of the A289.

Beyond reasonable walking distance to current public transport services

- 2.3.7 The Council have considered that the site is beyond reasonable walking distance to 'current public transport services'. Page 10 of the SIA (**Appendix 2**) provides an isochrone map of walking distances from the site. Within a five-minute walking distance (400 m) from the site access lies a number of bus stops on Gray's Inn Road (A2). This set of stops provides services towards Strood (south) and Gravesend (north). The 190 bus services provide 2 to 3 buses per hour on Monday to Saturday and one service per hour on Sunday (see Table 1 of this statement). The route runs south on the A2 and stops off at Canal Road (stop D). From this bus stop, it is a six-minute walk to Strood train station, where there are high-speed services into London and other localised rail services providing connections across the County.
- 2.3.8 Bus route no. 172 operates on Brompton Farm Road and provides three services per day. Whilst these services are limited, this is a key route for school bus services during the week in term time, providing routes to bus services 633, 673, 689, and 694.
- 2.3.9 It is noted that the site covers a large area. However, in assessing the site, it is unclear whether or not the Council considered route no. 190 as part of the

assessment of the site in the interim Sustainability Appraisal. It is clearly evident from the submitted SIA (**Appendix 2**) that the site can provide sustainable public transport services to other strategic public transport services such as rail stations and district centre locations such as Strood.

- 2.3.10 Given the large strategic nature of the proposed allocation of site SNF3, the site has the potential to extend existing bus services to provide improved services for future and existing residents. This can be discussed with the Council and bus operators in the future development proposals at the site.
- 2.3.11 Allocating the site for 800 residential dwellings would increase the area's critical mass of the population. This could provide the necessary population, along with any other allocated sites in this part of the Medway, to encourage the bus operator to improve the frequency of service no. 172, which only operates a limited timetable along Brompton Farm Road and even enter into the site to the neighbourhood centre to pick up more passengers. Bus services only improve with additional customers and the introduction of 800 homes and infrastructure provides additional patronage allowing for increased services.
- 2.3.12 It is also emphasised that route no. 190 provides regular weekday services connecting Strood train station to the site. It has also been demonstrated that due to the critical mass of population creation because of the allocation, there are opportunities to improve services along Gravesend Road and Brompton Farm Road.
- 2.3.13 Therefore, it is considered that the Council have not clearly justified why the site is considered to be beyond reasonable walking distance of current public transport services. It is submitted that the site is within reasonable walking distance to current public transport services with the ability of the bus services to be improved and integrated into the site upon discussion with the council and bus service operators as part of the site's future development.

Other sites

- 2.3.14 The draft plan relies heavily on delivery in the Hoo area. What is not clear at this moment in time is how the removing of the HIF funding will impact the development of the Hoo and existing rural settlements on the Hoo Peninsula. Therefore, there are still some ambiguities about how many homes will have to be discounted from the rural development category of the potential Housing Supply for Medway.
- 2.3.15 In terms of sensitivity testing, Appendix B of the Interim Sustainability Appraisal includes an "Assessment of Reasonable Alternative Spatial Delivery Options". Hoo Peninsula is included as B.7 and scores poorly across the board as is shown over from page B12. The plan is looking to deliver over 10,000 units on the Hoo

Peninsula which is 40% of the total housing delivery. Such a reliance on a site where the evidence base shows it performs badly is not considered a sound approach.

- 2.3.16 Equally there are many sites which have been allocated which are in far more sensitive landscape locations than SNF3. Some of these have a much greater impact on National Landscape designations. Choosing these sites over a SNF3 is considered to be far more damaging to the Boroughs landscape than releasing Green Belt land which is not located in a sensitive landscape location and is a buffer.

B.7 Hoo Peninsula

Table B.7.1: Assessment of the Hoo Peninsula SDO against the SA Framework

SA Objective	Score	Hoo Peninsula: Description of effect
SA Objective 1 (Climate Change Mitigation)	---	The Hoo Peninsula SDO could deliver a minimum of 10,893 homes. The construction and occupation of this large-scale residential development would be likely to significantly increase GHG emissions and result in a major negative impact against SA Objective 1.
SA Objective 2 (Climate Change Adaptation)	0	A small area of Flood Zones 2 and 3 can be found within the SDO, covering less than 5%, and less than 10% of the SDO coincides with areas of low, medium, and high SWFR . A negligible impact is identified for SA Objective 2.
SA Objective 3 (Biodiversity)	---	The Hoo Peninsula SDO lies within 400m of Thames Estuary and Marshes SPA and Ramsar, Medway Estuary and Marshes SPA and Ramsar, and High Halstow National Nature Reserve (NNR) . The SDO is located adjacent to multiple SSSIs, including Medway Estuary and Marshes SSSI, Tower Hill to Cockham Wood SSSI, and Chattenden Woods and Lodge Hill SSSI which is designated to protect nightingales. Some small areas of ancient woodland can be found within the SDO. Development in these areas has potential to significantly increase direct and indirect impacts on biodiversity including through habitat loss/fragmentation, pollution, recreational impacts, and predation of nightingales from cats, therefore a major negative impact on SA Objective 3 is identified.
SA Objective 4 (Landscape)	---	Large sections of the Hoo Peninsula SDO coincides with areas of both 'high' landscape sensitivity and capacity ¹ . The proposed development within the SDO would therefore have potential to alter the rural character and contribute to urban sprawl and reduce the separation between settlements , particularly between High Halstow and Fenn Street and Chattenden and Hoo. A major negative impact is identified for SA Objective 4.
SA Objective 5 (Pollution and Waste)	---	The A228 is the main road serving the Hoo Peninsula. The proposed development within the SDO could potentially expose site end users to higher levels of transport associated air and noise pollution. The SDO is located adjacent and in close proximity to watercourses, including the River Medway, potentially resulting in impacts for water quality . Additionally, the construction and occupation of 10,893 homes has potential to significantly increase air pollution . Overall, a major negative impact is identified for SA Objective 5.
SA Objective 6 (Natural resources)	---	The SDO predominantly comprises previously undeveloped land classed as ALC Grade 1, 2 and 3. The proposed development at this location would result in a significant and irreversible loss of land with potential environmental value, including large areas of BMV agricultural land . A small proportion of the SDO also coincides with MSAs , with potential to increase the risk of sterilisation of mineral resources. A major negative impact is identified on SA Objective 6.
SA Objective 7 (Housing)	++	The SDO would provide a minimum of 10,893 homes (approximately 40% of the total housing need). A major positive impact is identified for SA Objective 7.
SA Objective 8 (Health and Wellbeing)	---	The SDO is mostly located beyond sustainable distances to the majority of healthcare services , including the Medway Maritime Hospital, GP surgeries and leisure facilities. However, the SDO would provide good access to open greenspace and the PRoW and cycle networks , facilitating active travel and encouraging healthy lifestyles. Overall, a major negative impact is identified for SA Objective 8.
SA Objective 9 (Cultural Heritage)	---	The SDO encompasses several rural settlements where a number of listed buildings, including several Grade I Listed Buildings, can be found. Some other heritage assets also lie in close proximity to the SDO, including the adjacent Cooling Castle SM which is on the Heritage at Risk register, and Upnor Conservation Area. The proposed development in the currently undeveloped areas has potential to adversely affect the significance or setting of heritage assets within the area, and alter historic character. Overall, a major negative impact is identified for SA Objective 9.

SA Objective	Score	Hoo Peninsula: Description of effect
SA Objective 10 (Transport)	-	The SDO is located beyond the sustainable target distance to railway stations and is mostly located in areas with poor access to existing local services . The SDO is partially accessible for to bus services in some areas, although is wholly located outside of the high-frequency public transport routes. The SDO is partially accessible to pedestrian and cycle network routes. Overall, a major negative impact is identified for SA Objective 10.
SA Objective 11 (Education)	-	The majority of SDO is mostly located beyond sustainable distances to primary schools, secondary schools , although a proportion of the SDO would provide sustainable access to primary schools. The SDO is likely to provide good access to further education facilities. Overall, the SDO could potentially restrict accessibility to education opportunities and a minor negative impact is identified for SA Objective 11.
SA Objective 12 (Economy)	+	The SDO is located within sustainable distances to major employment locations including Kingsnorth and the Isle of Grain/Thamesport, providing a range of employment opportunities to residents. A minor positive impact is identified for SA Objective 12.

2.4 SUMMARY

- 2.4.1 MC rejected the site in its Interim Sustainability Appraisal due to the loss of BMV land, the site's location within the Green Belt, and the site's inability to be within reasonable walking distance of public transport services.
- 2.4.2 It is considered, given the justification above, that the site is in an area that should be released from the Green Belt to provide Medway with the opportunity to meet MC's housing needs. The site is within a suitable walking distance to existing public transport services and provides connections to key transport nodes in Strood. There are also opportunities for the site's future development to improve public transport services.
- 2.4.3 It is considered that the loss of BMV land should be considered in the planning balance as part of any future planning application given the Council's preferred SGO needs to deliver on the Council's Local Housing Need. Therefore, the reasons for rejection are not considered reasonable at this stage of the Plan-making process.
- 2.4.4 In terms of evidence base when comparing the site to others which have been chosen the site performs well. The Hoo Peninsula is relied on for a vast number of homes in the plan and performs worse than Strood in the evidence base. In addition, there are sites which are located in sensitive landscape designations and positions over SNF3 which is not.

3 VISION AND STRATEGIC OBJECTIVES

3.1 COMMENTS ON THE PROPOSED VISION

- 3.1.1 The "Vision" for Medway encompasses broad policy principles for the future emerging Local Plan covering transport, employment, the environment, retail, waste and minerals.
- 3.1.2 The "Vision" seeks to provide more sustainable and resilient development and strengthen and enhance Medway's character, including supporting green infrastructure, creating a healthy place to live and work, and providing decent places to live for all sectors and ages of the community. It further highlights Medway as a leading economic player in the region, where it can support the business space and attract new investment. Alongside development, there should also be improved travel choices and infrastructure.
- 3.1.3 However, the "Vision" is silent on its intention to meet its identified housing need and on its intention to address economic/employment needs. Indeed, the overarching principles for the "Vision" fail to identify housing at all as an important component of the Plan.
- 3.1.4 Whilst the "Vision" talks in general terms about how development is to be provided, central to the "Vision" must be "how much development is provided" as a matter that is fundamental to the framework for growth and spatial strategy as a determinative matter. This is a significant failing, considering the "Context" identifies "the supply of new homes is central to the Local Plan" (para 2.7).
- 3.1.5 NPPF (para 15) states that:

*The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a **framework for addressing housing needs** and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*

- 3.1.6 In the absence of the "Vision" setting out its intention of how much development will be delivered, specifically housing development, it does not provide a positive framework for addressing housing need contrary to the NPPF (para 15). This failing is further reinforced by the "Strategic Objectives" (see Section 3 of this Statement), which also does not address the scale of housing provision that should be delivered, contrary to the NPPF (para 20). This underlines the importance of the "Vision", setting out the intentions for growth.
- 3.1.7 The "Vision" as set out in para 2.1 must be amended as follows (new text in red):

Medway has conserved and enhanced its intrinsic cultural and natural heritage and landscapes alongside high quality development to strengthen the area's distinctive character. Medway has achieved sustainable growth through the development of housing, transport, environment, retail, employment and waste and minerals sites that have responded positively to tackling climate change, providing for healthier and more sustainable choices of homes, transport and workplaces, and reducing and mitigating the risks of flooding, overheating, drought and soil erosion.

- 3.1.8 As per our client's previous representation in October 2023, a new paragraph must still be added, or existing paragraphs amended as part of the "Vision" to set out the intention of the Local Plan to meet identified housing and employment needs. The 7th paragraph (un-numbered) could be amended as follows:

The Plan will seek to deliver 27,700 new homes to ensure the needs of all sections and ages of the community can find decent places to live. The quality of new development has enhanced Medway's profile, and driven up environmental standards in construction, and older properties have been retro-fitted to improve sustainability. Custom and self-build housing has provided new living opportunities for residents. Investment in new services and infrastructure, such as transport, schools, healthcare and open spaces, has supported house building to provide a good quality of life for residents.

- 3.1.9 The proposed change aligns with the "Development Needs" (set out in the executive summary of the draft Local Plan, which sets out the approximate housing target of 28,000 homes to be delivered across the Plan Period.
- 3.1.10 The outline changes are essential to ensure the Plan is "Positively Prepared", "Consistent with National Policy", and therefore "Sound" (NPPF, para 35)

Summary

- 3.1.11 Contrary to the requirements of the NPPF (para 15), the "Vision" fails to identify the provision of housing as an important component of the Plan and does not set out how much development should be provided for. This is a central component of the plan and a determinative matter for the spatial strategy. In not expressing the amount of development that is to be delivered, the Plan also fails to be positively prepared to provide a suitable framework for addressing housing needs for the delivery of 27,700 new homes.

3.2 COMMENTS ON THE STRATEGIC OBJECTIVES

- 3.2.1 The consultation document sets out four strategic objectives to positively plan for the development and infrastructure needs of Medway whilst conserving and enhancing the natural, built and historic environment. The objectives are:
- Prepared for a sustainable and green future;
 - Supporting people to lead healthy lives and strengthen our communities;
 - Securing jobs and developing skills for competitive economy; and
 - Boost pride Medway through quality and resilient development.
- 3.2.2 The strategic objectives, including their sub-objectives, have not materially changed since the previous Regulation 18 consultation. Therefore, our client's concerns remain the same as those previously submitted and are outlined below.
- 3.2.3 Paragraph 2.2.1 sets out that these objectives "*feed into the wording of policies and how sites and different locations are assessed for potential development*". It is, therefore, notable that there is no strategic objective dealing expressly with the amount of housing that needs to be delivered.
- 3.2.4 Whilst it is acknowledged that, in general terms, the objective of "*Supporting People to Lead Healthy Lives and Strengthening Our Communities*" mentions in general terms the types of housing to be delivered, it does not set out how much. This is a determining factor in deciding what is the most appropriate spatial strategy and should inform the basis of future strategic policies, as required by the NPPF (para 20 and 23). In accordance with the NPPF (para 11), this should also reflect, as a minimum, the objectively assessed need (27,700 new homes or 1,658 homes pa)
- 3.2.5 In the absence of clearly setting out the housing requirement and whether the Plan is looking to meet its need (which it should, the process of using the stated objectives to inform the Council's assessment of different sites and locations for development cannot be considered "Positively Prepared" or "Justified," contrary to the NPPF (para 35).
- 3.2.6 The "Strategic Objectives" must, therefore, be either expanded to include the amount of housing that is to be planned for, which must reflect the objectively assessed need as a minimum (NPPF, para 11b), or a new objective added that identifies this.
- 3.2.7 The general principles are supported for the spatial objectives more generally. However, they further highlight the need for the amount of development to be planned to be expressed as an objective since many of the other objectives are

dependent on the delivery of housing, including the ambitions for improved employment floorspace and higher-value employment opportunities, which are also reliant on providing enough housing.

- 3.2.8 More generally, the objectives also only discuss development on brownfield land as part of its regeneration objectives. They do not directly address the need to release greenfield land for development. This is misleading since the release of greenfield sites is essential to meeting the objectives of the Plan and, therefore, must be referenced for clarity.
- 3.2.9 The consultation document (para 5.11) further mentions that “*the Council must consider if there is capacity to provide up to an additional 2,000 homes to help meet Gravesham’s housing needs, following a request from the neighbouring authority*”. Again, the strategic objectives are silent on this matter, and it must be clarified whether the Council intends the Plan to help address this need, as a matter which is highly formative to the distribution of growth and selection of housing sites.

Summary

- 3.2.10 The strategic objectives as currently drafted do not provide a “Sound” basis to inform the development strategy, site selection or future planning policies, where they fail to set out the amount of development that is to be planned for. This is fundamental to informing the spatial strategy and policy making, especially in respect of setting strategic policies (NPPF, para 20). The objectives must therefore either be expanded or a new objective added which sets out that the Plan seeks to deliver its full objectively assessed need as a minimum (NPPF, para 11b). Greenfield land must be released to aid the delivery of this.

4 SPATIAL GROWTH OPTIONS

4.1 HOUSING SUPPLY AND DEVELOPMENT NEEDS

- 4.1.1 The previous Regulation 18 consultation document sets out Medway's development needs, identifying a current housing need of 1,667 homes pa or circa 27,700 over the Plan period (2022-2040). The Government's Standard Method sets out a requirement of 1,658 homes pa. MC set out that this results in a housing need of 26,528 across the Plan Period increasing to 27,854 accounting for the required 5% uplift. This covers a period of just 16 years. Whilst our client supports the Council's ambition to meet its overall housing need the Council need to increase its overall supply by year to reflect the longer plan period required by National policy.
- 4.1.2 The NPPF (para 69a) requires the Plan to cover a period of at least 15yrs from the date of adoption (para 22). Whilst at face value the Plan would appear to cover the required period, covering 16yrs, this provides little flexibility should Plan preparations stall or examination be delayed, meaning it would fall short of the required 15yrs. Indeed, the Council's published Local Development Scheme (Feb 2024) does not anticipate adoption of the Local Plan until Autum 2026. At this point the Plan would only have 15yrs left, allowing for no slippage, which is highly unlikely.
- 4.1.3 For the Plan to be considered to be "Positively Prepared" and therefore "Sound", the Plan period must be extended by at least a further year to provide flexibility and to cover inevitable delays in adoption, to ensure it is "Consistent with National Policy".
- 4.1.4 The Plan period should be increased to at least 17yrs, with a requirement for at least 29,595 new homes, including the 5% buffer.
- 4.1.5 As evidenced in Table 3.1, the Council has consistently failed to deliver against its housing requirement since 1986, with it last meeting its requirement in only two years back in 2008/09 and 2009/10. This has no doubt led to the current acute shortage of housing in Medway and the current identified need. During this time, the need for affordable housing has also become even more acute, with an identified annual need for 870 affordable homes pa (Medway Local Housing Needs Assessment, October 2021, prepared by Arc4).

Summary of Historic Housing Delivery in Medway			
Year	Completions	Requirement (at that time)	Difference
1986/87	1,118	1160	-42
1987/88	821	1160	-339

1988/89	1,454	1160	294
1989/90	1,467	1160	307
1990/91	391	1160	-769
1991/92	825	900	-75
1992/93	769	900	-131
1993/94	669	900	-231
1994/95	546	900	-354
1995/96	644	900	-256
1996/97	598	900	-302
1997/98	702	900	-198
1998/99	698	900	-202
1999/20	719	900	-181
2000/01	603	700	-97
2001/02	603	700	-97
2002/03	676	700	-24
2003/04	733	700	+33
2004/05	646	700	-54
2005/06	562	700	-138
2006/07	591	815	-224
2007/08	761	815	-54
2008/09	914	815	99
2009/10	972	815	157
2010/11	657	815	-158
2011/12	809	815	-6
2012/13	556	815	-259
2013/14	579	1000	-421
2014/15	483	1,000	-517
2015/16	553	1,000	-447
2016/17	642	1,000	-358
2017/18	680	1,334	-654
2018/19	647	1,683	-1,036
2019/20	1,130	1,662	-532
2020/21	1,087	1,586	-504
2021/22	1,102	1,657	-573
2022/23	1,049	1,658	-609
1986/87- 2022/23	28,465	37,385	-8,929

TABLE 4: SUMMARY OF HISTORIC HOUSING DELIVERY IN MEDWAY

- 4.1.6 The Local Housing Needs Assessment at Table 4 identified a need for both market and affordable housing, emphasising the need for the Council to plan to meet its

full objectively assessed need (28,183 homes pa) in full , as required by the NPPF (para 11b and para 23), supporting the Government's objectives to significantly boost the supply of homes (NPPF, para 60).

4.2 MEETING NEIGHBOURING AUTHORITIES' UNMET NEED

- 4.2.1 The Council also needs to consider paragraphs 11 and 60 of the NPPF to determine whether unmet needs arise in neighbouring areas (Gravesham Borough Council and Tonbridge Malling Borough Council) and whether additional land can be identified to meet some of their housing needs.
- 4.2.2 It is noted that Gravesham Borough Council through its previous Reg18 consultation requested that Medway Council take 2,000 homes to assist it in meeting its housing need. Under the July 24 draft NPPF consultation the proposed Revised Standard Method increased Gravesham's annual housing requirement by an additional 32 homes on top of its 661 homes pa target (693).
- 4.2.3 It is currently unresolved as to whether Medway Council intended to assist Gravesham in meeting its housing requirement. Furthermore, neighbouring Tonbridge and Malling Borough Council (TMBC) is also likely to have its housing requirement increased under the Revised Standard Method by a further 237 homes pa taking its total pa requirement to 1,057 homes. Like Gravesham, TMBC is also a highly constrained Borough, with circa 70% of the Borough being Green Belt. It is therefore also highly probable that TMBC will look to Medway as well, to assist in meeting its housing requirement.
- 4.2.4 Through the evidence available, it is not apparent whether Medway intends to assist neighbouring authorities in meeting their housing requirement, which must be addressed in the context of the NPPF (para 11 and 60).
- 4.2.5 If Medway Council does not assist neighbouring authorities, then it becomes even more pressing that Medway plans to meet its housing requirement in full, otherwise it will contribute to a worsening housing supply and affordability in east Kent.
- 4.2.6 As a minimum, the objective to meet the objectively assessed need in full is supported, as required by National policy, with the Council to explore further whether it also needs to plan to meet any needs arising from Gravesham Borough Council or any other Council's (as appropriate) i.e Tonbridge & Malling, which also borders Medway.

4.3 WINDFALL SUPPLY

4.3.1 Windfall development is defined at Annex 2 of the NPPF as sites not specifically identified in the Development Plan.

4.3.2 The NPPF (para 71) sets out that:

*Where an allowance is to be made for windfall sites as part of anticipated supply, there should **be compelling evidence that they will provide a reliable source of supply**. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. (Our emphasis)*

4.3.3 The Interim Sustainability Appraisal (para 3.1.2) sets out that after accounting for windfall sites and sites that are already committed, there is a residual requirement to identify 22,491 homes. Based on a housing requirement of 27,854 homes, windfalls and existing commitments make up 5,363 homes or 19% of the overall requirement, which is very significant.

4.3.4 Neither the Plan nor the supporting technical assessments provide any breakdown of what proportion of the 5,363 homes are already committed and what proportion is windfall or indeed what committed sites are being relied upon. In the absence of this information the full 5,363 committed and windfall homes cannot be depended upon.

4.3.5 As acknowledged in the NPPF (para 71), the Council can refer to historic windfall delivery. However, this must be considered in the context that Medway Council has not had an up-to-date Local Plan for some 20yrs. The vast majority of sites that have come forward are therefore not allocated and thus contribute to windfall provision. This significantly distorts the historic windfall delivery rate, and fails to consider that moving forward a larger proportion of future windfall sites are likely to be allocated in the Local Plan, thus also raising concerns in respect of double counting.

4.3.6 Having regard to the NPPF (para 71), this consultation Plan is not supported by any compelling evidence that would justify placing such significant reliance on the windfall supply or that the number is even realistic.

4.3.7 With regards to committed developments, as with the windfall supply, there is no evidence provided which identifies the sites and permissions being relied upon. It can therefore not be determined if the permissions are still extant or if developments have already been completed. Moreover, it cannot be assumed that every consented development comes forward and for the full number of homes that have been granted permission. As such a discount must also be applied to consented development, accounting for under delivering.

- 4.3.8 Based on the lack of available evidence, it has not been demonstrated that any reliance can be placed on the delivery of committed developments and windfall sites, as part of the Council's housing land supply. This is a significant omission, especially given the level of reliance that is placed on this element of the housing land supply. It can therefore only be concluded at this stage, that the Council has a deficit of at least 5,363 homes against requirements. As such the Plan cannot be considered "Sound", unless sufficient evidence is provided to support Reg19 and/or additional sites are identified to address the deficit.

4.4 PREFERRED SPATIAL GROWTH OPTION

- 4.4.1 We note that SGO3 is a 'Blended Strategy' incorporating brownfield regeneration and greenfield sites. Given the Council's significantly higher windfall allocation combined with existing and proposed unmet need for market and affordable homes in Medway and over 2000 homes of unmet need in the neighbouring authorities of GBC and TMBC, it is considered that MC need to allocate additional sites within the administrative area to meet their local housing need and unmet need from neighbouring authorities.
- 4.4.2 Whilst SGO3 is supported, the number of homes being planned must be re-visited and in all likelihood increased, to account for increasing the Plan period to at least 2042, a review of committed and windfall housing land supply and accommodating (if possible and necessary), growth from neighbouring authorities.
- 4.4.3 As such, MC needs to consider releasing further housing sites. Given the location of the Green Belt in Medway, it is considered that these locations would be optimal locations to meet any unmet need from neighbouring authorities (GBC and TMBC), and this land should be released from the Green Belt. The below section of this representation provides a Green Belt assessment as to why Site SNF3 is appropriate for Green Belt release.

5 NATURAL ENVIRONMENT

5.1 POLICY S1: PLANNING FOR CLIMATE CHANGE

- 5.1.1 The Council's draft viability study has Policy S1 labelled as a 'Vision for Medway in 2037'. Policy S1 in the Regulation 18 B consultation document is labelled Planning for Climate Change. The current Policy S1 sets out measures to mitigate the impacts of climate change. There are clear discrepancies between the draft Viability Report and the current consultation document as it does not currently consider the implications for planning for Climate Change and the measures set out above in the consultation document under Policy S1.
- 5.1.2 Our client supports the Council in mitigating and addressing the impacts of climate change. The viability study, however, does not appear to consider the proposed climate change considerations set out in Policy S1 above, which should be re looked at.

Question 1: The Council could consider setting local standards for development that go beyond national policy/regulations in addressing climate change. What evidence would justify this approach, and what standards would be appropriate?

- 5.1.3 It is noted that the Council declare the "*climate change emergency*" in 2019 making the move to net zero carbon as a priority. The Council's preferred approach to achieve this is to market new homes achieve a 31% carbon reduction, which is equivalent to the Future Homes Standard option 2. The Council viability report at paragraph 10.47 states that this would increase built cross by 3.1%.
- 5.1.4 Our client considers that the Council should not go beyond national policy/regulations in addressing climate change. This is because national policy and regulations are continually changing adapting to new and different concerns. For example, the Future Homes Standard (FHS) is anticipated to launch in 2025. The technical consultation on the proposed specification of the FHS took place in Spring 2023; further consultation is to take place throughout 2024, followed by the adoption of the regulations in 2025. From 2025, compliance with the FHS will become mandatory and will ensure that new homes built from 2025 will produce 75-80% less carbon emissions than those constructed under current Building Regulations. The FHS seeks to decarbonise new homes by improving heating and hot water systems and reducing heat waste.
- 5.1.5 Notwithstanding the above, it is noted that the FHS has yet to be adopted. Significant concerns and risks were raised in the technical consultation relating to the impact of the increased costs of implementing the FHS on house prices and

building costs. In turn, there is a chance that the full impact of achieving net zero could filter through into the viability and subsequent delivery of new schemes. It would, therefore, be prudent for the viability assessment to be re-run, including the scenario within which the FHS is implemented and considering any government funding to ensure that new development is able to achieve net carbon zero and remain viable.

- 5.1.6 Given the reasons set out above and the example of the FHS we consider that the Council should work policy S1 in a way that is flexible and adaptable enough to meet the ever-evolving requirements of national policy when it comes to meeting the challenges of climate change. The Council do not want to be over reliant on her policy in the future that is out of date with the current national policy at any particular one time.

5.2 POLICY S2: CONSERVATION AND ENHANCEMENT OF THE NATURAL ENVIRONMENT

- 5.2.1 Policy S2 should remain as is, with proposals only having to demonstrate a 10% net gain in accordance with the Environment Act, as required by law.

Question 2: Do you consider that the Council should seek to go beyond the statutory minimum of a 10% increase in BNG? What evidence can you provide to support your view?

- 5.2.2 Our client objects to Medway Council's seeking to go beyond the statutory minimum 10% increase in BNG. Brownfield sites such as Waterside Court have higher abnormal costs, and delivering biodiversity net gain above the statutory minimum requirement would be considered to add to these additional costs, causing viability issues for brownfield sites as a whole and is above the legal requirements set out in the Environment Act which came into effect in February 2024 for major developments. If MC wish to exceed the Environment Act's requirement for 10% BNG, this would need to be tested further by the Council. Any requirement should be proportionate to the proposed scale of development to ensure that development can be viable and fundamentally delivered.

5.3 POLICY S3: NORTH KENT ESTUARY AND MARSHES DESIGNATED SITES

- 5.3.1 Policy S3 is similar to that currently implemented by the Council through developer contributions as part of any planning application within the zone of influence of the identified areas set out within the policy. Therefore, our client does not object to its premise.

Question 3: Do you agree that the tariff based strategic approach applied to development within 6 km of the designated areas, supporting the delivery of the Bird Wise SAMMS programme represents an effective means of addressing the potential impact of recreational disturbance on the designated SPA and Ramsar habitats of the Thames, Medway and Swale Estuaries and Marshes.

- 5.3.2 Our client does not object to the tariff-based approach applied to development within 6 km of designated areas. Medway Council already has SAMMS payment as part of the development contributions to a Section 106 agreement or CIL contribution. The contributions are currently clearly set out within the Developer Contributions Guide, which gets updated annually, and this policy just formalises the existing approach in the Local Plan.

5.4 POLICY S4: LANDSCAPE PROTECTION AND ENHANCEMENT

- 5.4.1 The principles of this policy are for the protection the Kent Downs National Landscape, North Kent pushing development areas of lower landscape sensitivity.
- 5.4.2 Bellway Homes would continue to encourage MC to use a filtering process to filter out sites of higher landscape value as part of reviewing and assessing potential allocations in the emerging Local Plan.
- 5.4.3 Site SNF 3 is within the southern part of the Landscape Character Area (LCA) F3 Cliffe Woods. This LCA is classified as an undulating mixed agriculture landscape featuring agricultural, arable, orchards and horticultural uses. It notes that the south-west of the site lies in the Green Belt.
- 5.4.4 The key characteristics to highlight that the landscape is rural in character and provides a buffer to Strood and Higham. The rural character of the area is undermined in places by busy transport corridors.
- 5.4.5 Therefore, whilst the site is in a wider character area and seeks to retain the existing rural character of Cliffe Woods, the client site in the south-west part of the LCA has urbanising influences, including the urban edge of Strood and the A2 89, which conflicts with the goals of the Landscape Character Assessment for this part of Medway.
- 5.4.6 The LCA F3: Cliff Woods is a large landscape character area with multiple different some character areas. It is considered that the landscape area should be split up separating the area around the northern confines of Strood with the wider character area given the urbanised influences that affect this part of the administrative area of Medway.

- 5.4.7 The illustrative masterplan (**Appendix 1**) demonstrates how any future proposal at site SNF3 it can respect to respond to the key characteristics, sensitivities and qualities of the Landscape Character Area of Cliffe Woods providing appropriate landscaped buffers, planting and considerate location of built development.

Summary

- 5.4.8 Bellway Homes would continue to encourage MC to use a filtering process to remove sites of higher landscape value when reviewing and assessing potential allocations in the emerging Local Plan.
- 5.4.9 It is considered that the site SNF3 could come forward as an allocation and comply with policy as currently drafted. If you considered that due to the location of the site between urban edge of Strood and a 29 the site has urban influences and is not wholly within a rural location.
- 5.4.10 Therefore, it is agreed with the Medway Landscape Character Assessment prepared by LUC that the south-western part of LCA F3 Cliffe Woods has urbanising influences such as the urban edge of Strood and the A228 nine the impact the rural character of this part of the LCA. It is considered that this landscape area should be subdivided splitting the area around the north of Strood off from the more northern part of the LCA is currently need.

5.5 POLICY S5: SECURING STRONG GREEN AND BLUE INFRASTRUCTURE

- 5.5.1 This policy sets out that the Council will expect developments to demonstrate that they are designed using two, and can adapt to, future impacts of climate change, instructing ecological networks. The figure below is taken from the vision document and shows the Green infrastructure network opportunities that could be provided as part of the illustrative masterplan.



FIGURE 1 GREEN CORRIDORS/ INFRASTRUCTURE THROUGH THE SITE

- 5.5.2 The illustrative masterplan has been designed to allow development overlooked green space providing natural surveillance allowing green corridors facilitating residential areas subdivided by green fingers and tree-lined streets along with areas of meadow, woodland and formal playing provision to the north of the site allow green connections and corridors throughout the site.

5.6 POLICY DM1: FLOOD AND WATER MANAGEMENT

- 5.6.1 Policy DM1, as drafted, is aligned with the NPPF. Part of the policy is subtitled "Water quality and groundwater protection," and it requires proposals to comply with the Thames River Basin District Management Plan. The protection of water quality is important. However, Medway should adopt this document as a Supplementary Planning Document as part of its evidence base to help developers and applicants understand what the requirements are. Alternatively, the policy should set out the requirements to meet the measures set out in the Thames River Basin District Management Plan.

5.7 POLICY DM2: CONTAMINATED LAND

- 5.7.1 The policy sets out high-level principles of how the Council will seek developments to deal with land contamination and potential risks to human health and the environment. At the Regulation 19 stage of the Plan, the Council should set out what supporting evidence is required to be submitted as part of any planning application submitted for major developments.

5.8 POLICY DM3: AIR QUALITY

- 5.8.1 Any future draft policy at the Regulation 19 stage of the Local Plan process needs to set out the criteria for which development is required to submit such information, i.e., any major planning applications, any applications within an Air Quality Management Area, or other criteria that the Council may consider appropriate. This will clarify what technical information is required at any future planning application stage on our client site.

5.9 POLICY S7: GREEN BELT

- 5.9.1 Bellway Homes do not object to the principles of this policy, given they reflect the current National Planning Policy.
- 5.9.2 Medway has only a small proportion of land that is considered Green Belt (4.98%). Despite the small amount of land, the Green Belt retains the strategic gap between the urban areas of Gravesend and Strood and prevents the coalescence of Strood and Higham, Snodland and Halling. However, there are parcels of land within the Green Belt that do not fulfil their role fully when assessed against the five purposes of the Green Belt. These purposes are set out at paragraph 143 of the NPPF. below is an assessment of site SNF3 against the purposes of the Green Belt.

Question 8: Do you consider that exceptional circumstances exist to justify review of the Green Belt boundary?

- 5.9.3 This question asks whether the consultees consider exceptional circumstances exist to justify review of the Green Belt. This question is asked in relation to policy S7. However, it is considered appropriate to respond to this question in relation to the wider spatial strategy, in particular, Medway's preferred SGO3 (Blended Strategy). In considering whether Green Belt release is justifiable this important and necessary to take a strategic approach take into account the existing circumstances within other Local Planning Authorities in Kent to support any boundary amendments to the Green Belt.

- 5.9.4 Paragraph 145 of the NPPF sets out the criteria for reviewing Green Belt and the need to promote sustainable patterns of development. Stating that:

Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.

- 5.9.5 As demonstrated in paragraphs 2.1.18 to 2.1.20, the site is in close proximity to Strood (1.6 miles) and Higham (2.6 miles) train stations, providing HS1 and other mainline train connections to London and the southeast. The site benefits from easy access to the strategic road network via the A2. Paragraphs 3.2.7 to 3.2.13 demonstrate that the site is within a 5 minute walking distance of public transport (bus stops on Gravesend Road and Brompton Farm Road) that provides services into Strood District Centre. Therefore, it is considered that the site is well served by public transport and has the ability to improve bus connections to the site, given the scale of the proposed development at the site.

- 5.9.6 As MC will be aware, draft NPPF was published by the Labour Government in July 2024. Under the transitional arrangements Annex 2 paragraph 226 states that:

The policies in this Framework (published on [publication date]) will apply for the purpose of preparing local plan from [publication date + one month] unless one or more of the following apply:

- (a) the emerging annual housing requirement⁸³ in a local plan that reaches or has reached Regulation 19 (pre-submission stage) on or before [publication date + one month] is no more than 200 dwellings below the published relevant Local Housing Need figure;*
- (b) the local plan is a Part 2 plan that does not introduce new strategic policies setting the housing requirement unless the relevant Local Plan Part 1 has been prepared applying the policies in this version of the Framework;*
- (c) the local plan is or has been submitted for examination under Regulation 2286 on or before [publication date + one month]*

- 5.9.7 The Council's preferred growth option (SGO 3) provides up to 23,733 dwellings plus it windfall allowance. This would be more than 200 dwellings below the housing requirement across the Plan Period. Even if the Council reaches Regulation 19 (resubmission stage), it is considered that the new NPPF one's adopted will be a material consideration in the examination of the Draft Local Plan. Therefore, MC should consider the Draft NPPF when allocating indicative

locations for residential led development at this stage of the plan-making process. Paragraph 142 of the Draft NPPF sets out that:

Once established Green Belt boundary should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of updating of plans. Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing, commercial and other development through other means. In the circumstances authorities should review Green Belt boundaries and proposed alterations to meet these needs in full, unless the review provides clear evidence that such alterations would fundamentally undermine the function of the Green Belt across the area of the plan as a whole.

- 5.9.8 Given the above, the draft wording of the NPPF explicitly states that not meeting housing needs is an exceptional circumstance for Green Belt Release. As set out in paragraph 2.24, MC preferred SGO or under delivered on the authorities' housing needs. It is submitted that the site SNF3 should be allocated in the Regulation 19 Local Plan as a Green Belt Release site capable of delivering 800 homes towards the identified housing need.

Allocation of site SNF3 to meet GBC's housing need

- 5.9.9 Paragraphs 3.5.4 to 3.5.9 deal with how Medway can help meet neighbouring authorities' (Gravesham BC and Tonbridge and Malling BC) housing needs. As set out above, Gravesham BC has identified a housing need of 2000 homes from its potential supply that Medway needs to put forward to meet this need. Meanwhile, TMBC needs an uplift of 237 homes per year on top of the existing Standard Method calculation, taking their total supply per year to 1,057 homes per year.
- 5.9.10 It is understood that GBC as part of its emerging Local Plan wishes to allocate a potential new settlement option on the boundary of Medway immediately to the north of site SNF3, which the Church Commissioners are bringing forward. This land also lies in the Green Belt. Whilst it is noted that the statement of common ground would be needed with GBC to confirm if this proposed new settlement within the Green Belt forwards at this stage the Council and our client know no different.
- 5.9.11 This representation demonstrates that site SNF3 is in a sustainable location within the proximity to transport and has the ability to be self-sufficient, providing everyday services within the proposed allocation such as school, medical, retail units, and playing pitch provision as indicated by the SIA prepared by DHA planning (**Appendix 1**) and set out in Section 2.1 and the illustrative masterplan (**Appendix 5**). If GBC were to continue to propose new settlements on the border of Medway and the GBC site, SNF3 would also be able to demonstrate that it can be brought

forward in close proximity with other strategic housing allocations outside of Medway, which could positively impact the occupants of the dwellings.

- 5.9.12 It is therefore submitted that the site is in an ideal location close to GBC and its Housing Market Areas to help contribute to a both Medway's identified and mapped housing need along with a proportion of GBC's 2,000 unmet housing need.

Allocation of Site SNF3 Along with SNF1 and SNF5

- 5.9.13 The draft NPPF at paragraph 145 is explicitly clear that Green Belt should be released if an authority cannot meet its housing need. Gravesham BC make it clear that even with Green Belt release that they will not be up to deliver the additional 2000 homes required to meet the housing needs. If MC are concerned about allocating our clients site (SNF 3) individually and how this will meet the needs of Medway, GBC and TMBC another consideration is that the neighbouring sites SNF1 and SNF5 could be brought forward along with our client site SNF3 as part of a comprehensive redevelopment of land south of the A289 to provide a comprehensive urban extension to Strood, providing over thousand homes to meet Medway's and other neighbouring authorities housing needs to comprehensively deal with the wider issue housing need in the County.
- 5.9.14 Given the unmet need across MC, GBC and TMBC, there is increasing evidence to suggest these three sites SNF1, SNF3 and SR5 should all come forward come forward as part of a wider strategic urban extension to help meet north Kent's housing need delivering much-needed market and affordable housing to cover both market areas in Gravesham and Medway. **Appendix 4** shows in masterplan prepared by OSG of how such an urban extension to the north of Strood could come forward.
- 5.9.15 Given the above, site SNF 3 is considered to be in a sustainable location and would be able to help meet Medway's housing needs either as an independent allocation or as part of a wider allocation along with sites SNF1 and SR5 to meet some of GBC as well as Medway's needs given the sites proximity to the neighbouring authority. As such, it should be allocated as a Green Belt release site in the Regulation 19 Local Plan.
- 5.9.16 It is considered appropriate to respond to this question in relation to the wider spatial strategy in particular, Medway's preferred SGO3 (Blended Strategy). In considering whether Green Belt release is justifiable this important and necessary to take a strategic approach take into account the existing circumstances within other Local Planning authorities in Kent to support any boundary amendments to the Green Belt.

- 5.9.17 The Council's preferred growth option (SGO 3) provides up to 23,733 dwellings plus its windfall allowance. This would be more than 200 dwellings below the housing requirement across the Plan Period. Even if the Council reaches Regulation 19 (submission stage), it is considered that the new NPPF once adopted will be a material consideration in the examination of the Draft Local Plan. Therefore, MC should consider the Draft NPPF when allocating indicative locations for residential development at this stage of the plan-making process. Paragraph 142 of the Draft NPPF sets out that:

"Once established Green Belt boundary should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of updating of plans. Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing, commercial and other development through other means. In the circumstances authorities should review Green Belt boundaries and proposed alterations to meet these needs in full, unless the review provides clear evidence that such alterations would fundamentally undermine the function of the Green Belt across the area of the plan as a whole."

- 5.9.18 Given the above, the draft wording of the NPPF explicitly states that not meeting housing needs is an exceptional circumstance for Green Belt Release. As set out earlier, MC's preferred SGO is under delivering on the authorities' housing needs. It is submitted that the site SNF3 should be allocated in the Regulation 19 Local Plan as a Green Belt Release site capable of delivering 800 homes towards the identified housing need.

6 BUILT ENVIRONMENT

6.1 POLICY T1: PROMOTING HIGH QUALITY DESIGN

- 6.1.1 The Policy, as currently drafted, provides a checklist for designing high-quality developments that are reflective of the requirements set out in the NPPF. However, the policy also sets out that all developments should demonstrate sustainability criteria, such as:
- (1) Meeting the BREEAM standard of 'Very Good' for both energy and water efficiency; and
 - (2) Biodiversity 2020, and Building with Nature Standards
- 6.1.2 These requirements define "what good looks like" and cover the themes of well-being, water, and wildlife, among other references.
- 6.1.3 We raise concerns about MC ensuring all developments meet the BREEAM 'Very Good' standard for energy and water efficiency as these are requirements currently set out in the Building Regulations so have to be complied with. Therefore, there is limited justification as to why they are being replicated in planning policy.

6.2 POLICY DM 5: HOUSING DESIGN

- 6.2.1 Bellway Homes is concerned by bullet point 3 of this policy. This policy requirement would be better suited to Policy T4. The requirement for M4 building standards for dwellings can be incorporated into Policy T2: Housing Mix, setting out the mix of M4 (2) and M4 (3) homes, which are all designed to adapt to various living situations.
- 6.2.2 Moreover, we raise concerns over the policy stating that no more than 5% north-facing single-aspect homes within any one development will be considered. Whilst the premise of this bullet point is in accordance with paragraph 135 (f) of the NPPF, seeking to create places that are of a high standard of amenity for existing and future users, we question how the Council has come to the conclusion that no more than 5% of north-facing single-aspect homes will be considered and enforced against. Detailed evidence should be provided by the council to support this approach in any future policy in any Regulation 19 Local Plan.
- 6.2.3 The last bullet point of the policy seeks a design for flexible living: successful places that are robust and support 'long life and loose fit' neighbourhoods that are flexible and adaptable to rapidly changing circumstances. Our client has concerns regarding the deliverability of this part of the policy. What standards does the

Council intend to apply to help determine whether something is flexible living, and what are the key design criteria for long-life and loose-fit neighbourhoods? The Council should consider the production of the Supplementary Planning Document (SPD) or details within a Design Code to clearly set out how they wish housing standards to meet such fluid design criteria to help applicants understand what is required of a planning application which may help facilitate the long life and loose fit neighbourhoods set out in the policy.

- 6.2.4 Ultimately, this policy's last part currently appears intangible. The Council needs to provide further guidance about how long-life and loose-fit neighbourhoods will manifest themselves in the Medway towns.

6.3 POLICY DM6: SUSTAINABLE DESIGN AND CONSTRUCTION

- 6.3.1 The policy states in its last bullet point that "*All residential proposals shall detail how they are seeking to facilitate working from home within the design, including access to high-speed broadband/internet.*" As part of the vision for site SNF3 Bellway Homes as set out in the vision document for the site provide healthy placemaking includes helping to alleviate traffic and avoid the stress of commuting to work and encouraging homeworking. Therefore, whilst our client supports the premise of this policy this part of the policy is broad brush. The Council needs to consider how this policy will manifest itself in practice. The applicant should provide robust evidence to demonstrate whether this is feasible.

7 HOUSING

7.1 POLICY T2: HOUSING MIX

- 7.1.1 Policy T2 is considered a strategic policy to ensure that the Council delivers a sustainable and suitable mix of housing to meet local housing needs as set out in the three Local Housing Need Assessments. The Local Housing Needs Assessment (2021), Which Is Part of the Evidence Base for the Emerging Local Plan, states that 1no. and 3no.bed dwellings are currently the lowest housing stock in the district. The assessment also states that there is an overall need for 30 to 35% of dwellings to be flats within the overall housing mix.
- 7.1.2 We would question the appropriateness of future wording of this policy applying any district-wide percentages for house types as this will likely lead to the delivery of housing types in areas where this is not a localised need. The same applies with respect to the blanket requirement for bungalows on all larger schemes.

Question 10: Do you think this policy provides effective guidance on the required housing mix in Medway?

- 7.1.3 Given the strategic nature of this policy, it is considered that the policy provides effective guidance, pointing to the latest local housing need report to understand the required site location characteristics.

7.2 POLICY T3: AFFORDABLE HOUSING

- 7.2.1 it is noted that the Council have an annual net shortfall of 870 affordable dwellings per annum and that this policy seeks to reduce this overall shortfall. Bellway Homes are satisfied with a 30% affordable homes policy on Greenfield sites

Question 11: Do you agree with having a 10% requirement for affordable housing on urban brownfield sites and 30% requirement for affordable housing on greenfield sites and higher value urban locations? What do you consider would represent an effective alternative approach? Do you agree with a varied approach for affordable housing requirements based on the different value areas across Medway?

- 7.2.2 The Council's approach taken to a varied approach of affordable housing requirement based on different value areas across Medway is considered appropriate given the level of needs in different parts of the district.

Question 12: What do you consider would represent an effective split of tenures between social/affordable rent and intermediate/low-cost home ownership housing in delivering affordable housing?

- 7.2.3 Bellway Homes does not object to the principle of having a percentage split relating to social/affordable rent and intermediate low-cost home ownership. It is considered that the policy should use percentages led by the need requirement set out in Table 7.1 of the Local Housing Needs Assessment to inform the percentages to accompany Policy T3.

Question 13: Do you have any views on the delivery of affordable housing, and the cascade principle? What evidence can you provide to support your views?

- 7.2.4 Paragraph 6.3.13 of the Local Plan consultation document sets out the cascade principle. The market is current failing to deliver Section 106 affordable housing so a cascade approach is considered appropriate to allow for other ways for affordable housing to still be delivered. The preference for on-site delivery of affordable housing, then off-site provision on an alternative site, followed by financial contribution as a last resort is supported.

POLICY T9: SELF-BUILD AND CUSTOM HOUSEBUILDING

- 7.2.5 Bellway Homes raise no concerns that the policy sets out that sites of 100+ dwellings will be expected to provide no less than 4% plots for self and custom build. The illustrative masterplan and vision document (**Appendix 5**) show that Bellway are already planning to provide self-build options on-site SNF3 as part of any scheme being brought forward.

8 CONCLUSIONS

8.1 OVERALL SUMMARY

Overall Summary

- 8.1.1 The overall Vision for Medway partly accords with Paragraph 15 of the NPPF setting out the economic, social and environmental priorities for the Local Plan to facilitate Medway becoming a leading regional city. However, the vision is silent on the requirement of Paragraph 15 to require an up-to-date plan to provide a framework for addressing housing need. Delivering homes and new neighbourhood and communities underpins economic investment, social, and environmental priorities as it is a catalyst for place-making which is at the heart of Medway's vision to become a leading regional city.
- 8.1.2 To support a vision that includes a framework to deliver housing to meet local needs, it is essential to have a strategic objective that supports the delivery of homes and the need for housing, as it is the underlying catalyst for creating the sustainable, resilient and economically driven aspirations for Medway to become a leading regional city. Therefore, a fifth objective is required within the emerging Local Plan at the Regulation 19 stage of development to address housing needs in Medway to deliver the vision of the Local Plan.
- 8.1.3 Considering the above assessment of the 447 Stage 1 LAA sites across the four residential development options that seek to deliver the 28,312 homes across the Plan period there are concerns over the deliverability of many of the sites across all the options proposed in the consultation document. The reasons are due to:
- Deliverability concerns over the loss of HIF funding and the sustainability of sites in rural development areas;
 - The development of Suburban Growth areas that are currently identified as sites of landscape sensitivity/importance;
 - Potential viability concerns over the deliverability of sites in all the options due to the cost of remediation measures, the impact of mandatory BNG (from January 2024 for major development sites); and
 - Sites deliverability being challenged due to the age/ number of lapsed consents on the site.
- 8.1.4 Given the concerns raised above and the absence of any further sustainability appraisal of the sites by the Council to date, a conservative estimate is that 10,182

homes can be removed from the potential Housing Supply for the plan period before the Council have discounted any sites at Stage 2 and 3 of the LAA through the sustainability appraisal, which would undertake a full sustainability appraisal of the sites submitted.

- 8.1.5 What is not clear at this moment in time is how the removing of the HIF funding will impact the development of the Hoo Peninsula and existing rural settlements on the Hoo Peninsula. Therefore, there are still some ambiguities about how many homes will have to be discounted from the rural development category of the potential Housing Supply for Medway. Hoo itself scored poorly in the SA assessment which forms the evidence base for its allocation.
- 8.1.6 Site SNF3 is well located on the urban edge of the Strood, with it being well served by public transport and the ability for this to be improved. It is considered that were it not for the Green Belt location the site would have come forward for development previously as all other matters make it a logical, sustainable and deliverable site to bring forward. This site is particularly needed due to the need for housing, and concerns over the viability and deliverability of rural settlement expansion on the Hoo Peninsula and the Hoo Development Framework caused by the loss of HIF funding, and the complex viability issues surrounding urban regeneration sites in and around Chatham, Strood and Rainham.
- 8.1.7 Following the assessment of the opportunity, the site is required to help meet Medway's housing need. In Section 5 the site is considered to be an appropriate site for Green Belt release in accordance with the NPPF paragraph 142. The government are also currently consulting on changes to the NPPF which strengthens the need to release Green Belt sites to achieve housing numbers which have limited contribution to the purposes of the Green Belt. This site sits firmly within this category.

Conclusion

- 8.1.8 Site SNF3 is sustainable, achievable and deliverable (started) within years 1 to 5 of the Local Plan given its greenfield nature and proximity to Strood. There are no physical or other constraints so significant to hold up delivery. The site can help meet the identified housing needs of Medway that may not be achievable otherwise given the authorities constraints and loss of HIF funding without the use of Green Belt sites.
- 8.1.9 Bellway would support a preferred development strategy that releases Green Belt land for residential development due to the speed in which greenfield sites can be released to meet the housing requirements of the Local Plan in the first 5 years of the plan period. However, Bellway acknowledges that to deliver the scale of housing required a strategic approach delivering dwellings across all the categories is required to meet Medway's housing need for the plan period.

- 8.1.10 Therefore, the site SNF3 should be allocated in a draft Regulation 19 Local Plan as a residential led site (with infrastructure) for Green Belt release.

APPENDIX

1



Broomhill Rise

Social Infrastructure Audit

Final Report

September 2024



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1.0 Introduction

1.1 Overview

- 1.1.1 Social infrastructure can be defined by the facilities, spaces, services and networks that support the quality of life and wellbeing of our communities.
- 1.1.2 DHA Social infrastructure Audits evaluate the availability, accessibility, and quality of community facilities and services in a particular area and summarises how the proposal relates to and seeks to contribute to them.
- 1.1.3 This document has been prepared on behalf of Bellway Homes LTD by DHA associated with the proposed development at land at Brompton Farm.



aprx. 800
new dwellings.



Proposed
Neighbourhood
centre



New school

1.2 Proposed Development

- 1.2.1 The current proposed development is for the development of approximately 800 dwellings, a school and a neighbourhood centre containing small retail units and a medical hub.



New open
Space

2.0 Policy Review

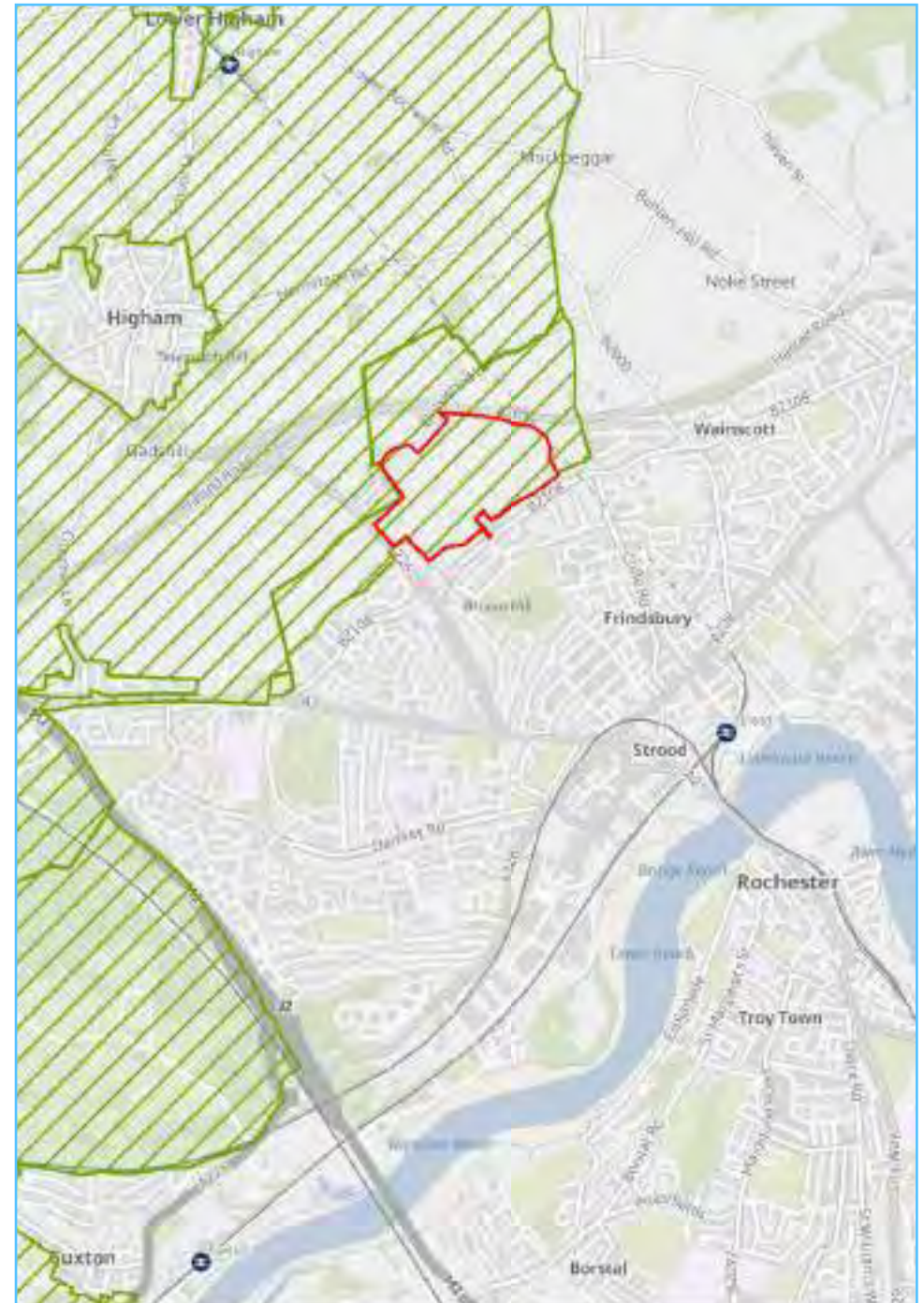
2.1 Greenbelt

2.1.1 Medway has only a small proportion of land that is considered Green Belt. Approximately only 4.98% of the Medway's land is designated as Green Belt. Despite the small amount of land, the Green Belt retains the strategic gap between the urban areas of Gravesend and Strood and prevents the coalescence of Strood and Higham, Snodland and Halling. As such, the Green Belt plays an important role in this regard.

2.2 NPPF Policy

2.2.1 The NPPF sets out that the Green Belt serves five purposes:

- (1) To check the unrestricted sprawl of large built-up areas;
- (2) To prevent neighbouring towns merging into one another;
- (3) To assist in safeguarding the countryside from encroachment;
- (4) To preserve the setting and special character of historic towns; and
- (5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.



2.2.2 Policy BNE30 states that:

Within the Metropolitan Green Belt, as defined on the proposals map, there is a general presumption against inappropriate development. Development will not be permitted unless the following objectives are fulfilled:

- (i) It is designed and sited so that the open character of the area is maintained; and
- (ii) It accords with the purposes of including land in the Green Belt
- (iii) New buildings will only be permitted for the following purposes:
 - (a) Agriculture or forestry;
 - (b) Essential small-scale facilities for outdoor sport or recreation, for cemeteries or other land uses that fulfil the above objectives; or
 - (c) A limited extension, alteration or replacement of an existing building; or
 - (d) Limited infilling within the boundary of Upper Halling
- (iv) The reuse of buildings will only be permitted if:
 - (a) The development fulfils the above objectives, taking into account any proposed extension to the buildings and any associated uses of land surrounding the buildings; and
 - (b) The buildings are of permanent and substantial construction, and are capable of conversion without major or complete

reconstruction; and

- (c) The form, mass and general design of the buildings are in keeping with their surroundings.

2.2.3 Policy S7 of the emerging Local Plan (Regulation 18) states that The Council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

2.2.4 Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.

2.2.5 The Council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.

2.3 Medway Green Belt Review (2018)

2.3.1 The Medway Green Belt Review divides the Green Belt into five different parcels. The site forms the larger northeastern area of Parcel 2. Parcel 2 is described as the following:

"The parcel is situated to the south of the A289. The southern edges of this parcel are bordered by the urban fringes of Strood which form Medway's Green Belt boundary within this area. This parcel should be viewed integrally with Parcel

1. It forms part of a larger tract of Green Belt land which extends beyond the district boundary into Gravesham (to the north and west). The Green Belt washes over the A289 and A226. Land uses consist of a mixture of arable, horticulture and orchards. The orchard and horticultural uses are focused to the north with arable farmland to the south and west. The land falls away gently to the north west. The landscape character changes according to land uses. The area of polytunnels to the south of Dillywood Lane is more enclosed; the arable farmland and orchard areas more open. The arable farmland to the south west (separated by the A226 and a steep embankment) is distinctly part of the wider green belt farmland extending towards the A289 and beyond. The southern corner of this parcel has recreational sports uses and includes the Rochester City Football Ground. Urbanising influence of A289 to north mitigated by cutting and planted edge."

2.3.2 The Council concludes that Parcel 2 provides a high contribution to the purpose and aims of the Green Belt.

2.3.3 There have also several planning applications related to the site. These applications proposed large scale residential developments of up to 135no. residential dwellings (MC/16/2917) and up to 122no. dwellings (MC/17/2956) which were subsequently both refused due to inappropriate development within the Green Belt and the loss of

high-quality agricultural land.

2.4 Green Belt Review (January 2023)

2.4.1 A Green Belt Review was undertaken by Scarp Landscape Architecture to inform the contribution and importance of Green Belt Parcel 2.

2.4.2 The Scarp Green Belt Review describes that the proposals would implement a Green Infrastructure corridor on the north-western part of the site. This corridor provides mitigation to the resulting harm of preventing urban sprawl into the countryside, by delivering enhanced biodiversity, habitat, screening of the proposed development and publicly accessible recreational open space.

2.4.3 The Scarp Green Belt Review notes that whilst the Medway Council Green Belt Review concludes that Parcel 2 provides an overall high contribution to the purpose and aims of the Green Belt, no justification was provided for this assessment.

2.4.4 The Scarp Green Belt Review concludes that, based on the five purposes of the Green Belt, the site makes only a moderate contribution to purposes 1 and 3, a weak contribution to purpose 2 and no contribution at all to purposes 4 and 5.

2.4.5 Regarding the development proposal, the proposed housing would result in the extension of built-up area but would not constitute as a sprawl in 'an untidy or irregular way'.

3.0 The Site

3.1 Study Area

3.1.1 The site straddles three parishes; Higham CP, Finsbury Extra CP and Medway.





3.1.2 The survey area extends to a 10 minute drive time from the site boundary in all directions covering a large proportion of Medway.

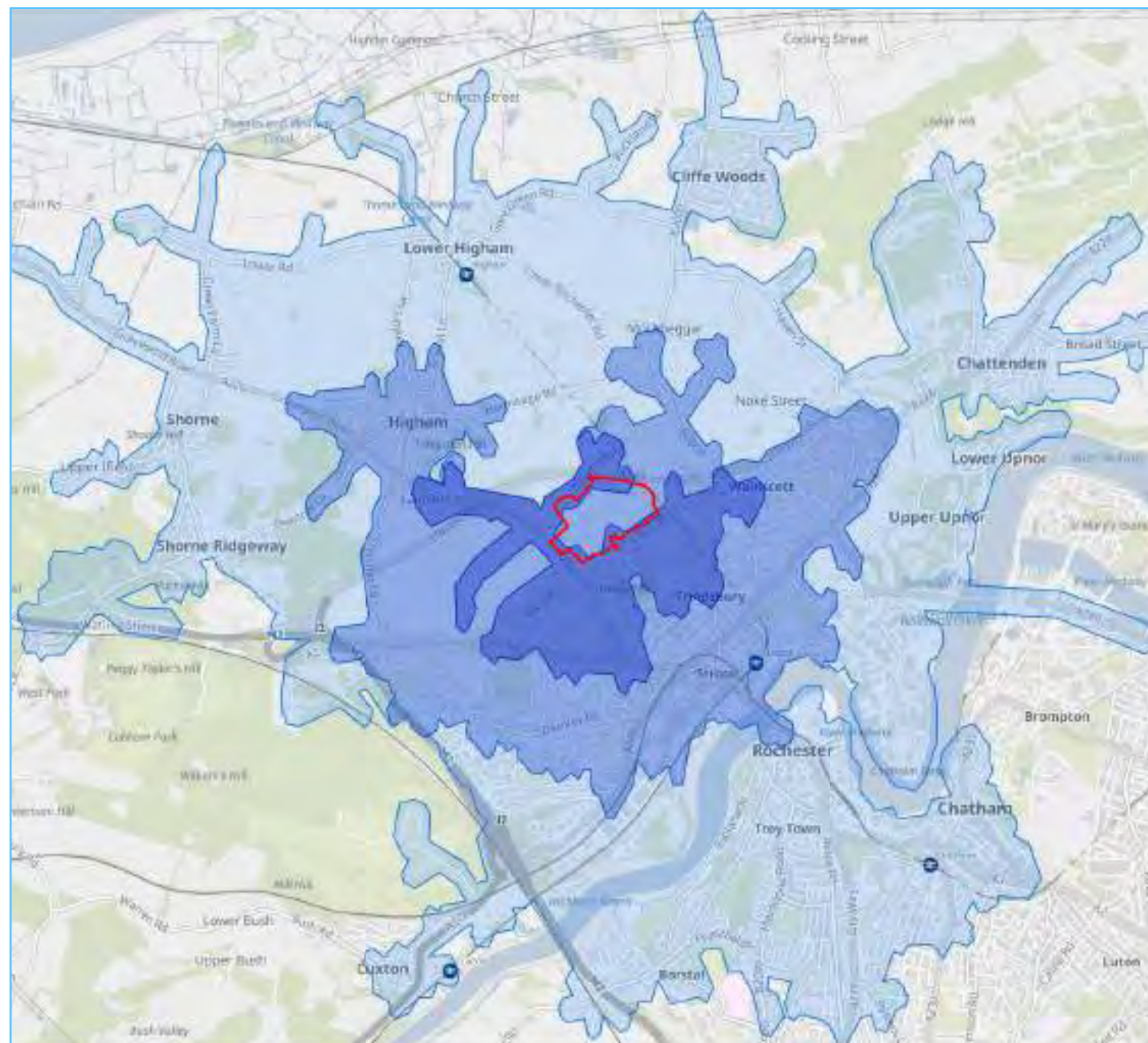


3.3 Cycling Distance

- 3.3.1 An acceptable cycling time is considered to be 20 minute cycle (approximately 5.3km cycle) to key infrastructure.
- 3.3.2 The entirety of Higham and the majority of Strood can be achieved within a 10 minute (2.7km) cycle whilst a 20 minute cycle will reach Rochester, Chatham, Chattenden, Cliff Woods and Lower Higham.

Key

-  Site Boundary
-  5 Minute Cycle Distance (1.3km) From The Site Access
-  10 Minute Cycle Distance (2.7km) From The Site Access
-  20 Minute Cycle Distance (5.3km) From The Site Access



3.4 Connectivity

3.4.1 Buses

A pair of bus stops are located on Gravesend Road, approximately 130m (or a 1 to 2 minute walk) from the proposed principal vehicular access, it is noted that this bus stop is serviced by the 190 which provided connection to Strood Town Centre and further into Chatham. A further pair of bus stops are present on Brompton Farm Road approximately 42m (or a 1 minute walk) from the proposed secondary access. The bus routes and frequencies are shown in Tables 1 and 2.

3.4.2 Train

The nearest railway station to the site is Strood, which is located approximately 2.0km (representing a 26 minute walk or a 9 minute cycle) from the proposed secondary site access on Strodes Close. This station is afforded disabled parking, step-free access and cycle storage in the form of covered Sheffield stands for 40 cycles. Table 3 lists the direct train services that are available from this station along with their weekday and weekend frequencies.

Service No	Route	Weekday	Saturday	Sunday
190	Gravesend - Chatham	2 - 3 per hour	2 - 3 per hour	1 per hour
668	Chalk - Grammar Schools	1.4	19	4
694	Higham - Grammar Schools	1.6	20	6

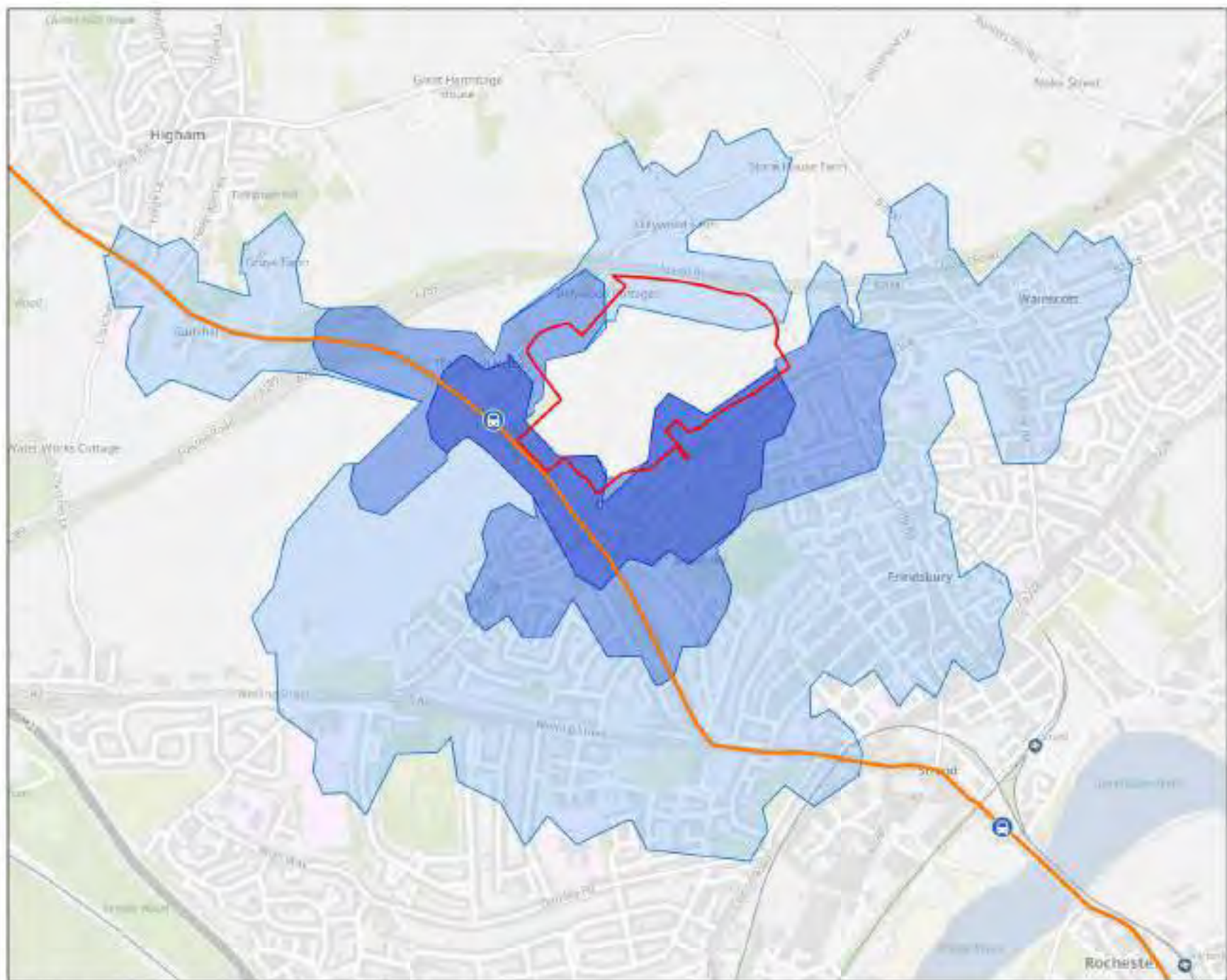
Table 1: Bus services available on Gravesend Road

Service No	Route	Weekday	Saturday	Sunday
172	Wainscott - Strood - Chatham	3 per day	No service	No service
633	Cliffe - Grammar Schools	School service	No Service	No service
673	Cuxton - Hoo Academy	School service	No service	No service
689	Darnley Arch - Hundred of Hoo Academy	School service	No service	No service
694	Higham - Grammar Schools	School service	No service	No service

Table 2: Bus services available on Brompton Farm Road

Service	Weekday	Saturdays	Sundays
Luton via London Blackfriars	2 per hour	2 per hour	No direct service
Ramsgate	1 per hour	1 per hour	1 per hour
Rainham	4 per hour	3 per hour	3 per hour
Paddock Wood	2 per hour	2 per hour	1 per hour
London St Pancras International	4 per hour	3 per hour	3 per hour

Table 3: Bus services available on Brompton Farm Road



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Bus Stop
- 180 Bus Route

4.0 Social Infrastructure

4.1 Education

Supply

4.1.1 As of 2018, Medway had 112 schools with 18 of the state funded schools being of faith. A breakdown of the varying types of schools are set out in Table 4.

Primary Schools

4.1.2 A total of 4no. primary schools are located within a 20 minute walk distance from the site access.

4.1.3 The closest primary school is Temple Mill Primary School located approximately 970m (12 minute walk) east of the site. The school has a total capacity of 210 students with a current enrolment of 242 students.

4.1.4 The second closest primary school is St Nicholas CoE Infant School which is located approximately 1.4km (19 minute walk) from the south of the site. This school has a capacity of 120 students with a current enrolment of 120 students.

4.1.5 The third closest primary school is Gordon Children's Academy

located approximately 1.6km (20 minute walk) away from the east side of the site. The school has a capacity of 400 students with an current enrolment of 320 students.

No.	Type	Number
1	Infant	15
2	Junior	11
3	Primary	52
4	All-Through	1
5	Secondary Selective	6
6	Secondary Non-Selective	10
7	University Technical College	1
8	Special Primary	1
9	Special Secondary	3
10	Special All-Through	1
11	Pupil Referral Unit	2
12	Independent	6
13	Independent Special	3
14	Total	112

Table 4: Breakdown of schools in Medway

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2023/2024
1	Temple Mill Primary School	0.97	12	4	3	242
2	St Nicholas CoE Infant School	1.4	19	4	4	120
3	Gordon Children's Academy	1.6	20	6	5	320
4	Hilltop Primary School	1.6	20	7	4	460

Table 5: Primary Schools in proximity

Post Primary Schools

4.1.6 There are 6no. secondary and higher schools located within the search area.

4.1.7 The closest school is Strood Academy which is located approximately 1.6km to the south west of the site. The school has a capacity of 1500 pupils and has a current enrolment of 1302 pupils.

4.1.8 The second closest is Rochester Independent College which is located approximately 3.5km from the south corner of the site. This school has a capacity of 209 pupils and a current enrolment of 205 pupils.

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2024/2025
1	Strood Academy	1.6	20	5	4	1302
2	Rochester Independent College	3.5	47	10	11	205
3	Fort Pitt Grammar School	4.3	61	16	13	932
4	St John Fisher Catholic Comprehensive School	4.3	61	16	13	1094
5	The Rochester Grammar School	5.1	73	21	14	1177
6	University Of Kent Rochester	7.7	105	26	12	unknown

Table 6: Post Primary Schools in proximity

SEN Schools

4.1.9 There are two of Special Educational Needs (SEN) schools.

4.1.10 The closest SEN school is Abbey Court Foundation Special Educational Needs School which is located approximately 0.5km to the south west of the site. The school has a capacity of 205 pupils and a current enrolment of 218 pupils.

4.1.11 The second closest is Abbey Court Community Special School. This SEN school is located approximately 0.8km to the south east of the site.

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2024/2025
1	Abbey Court SEN School	0.5	6	2	1	218
2	Abbey Court Community Special School	0.8	11	3	2	Unknown

Table 7: SEN Schools in proximity

Mixed Schools

4.1.12 The only mixed school is Gad’s Hill School which is located approximately 1.4km to the northwest of the site. The school has a capacity of 755 pupils and a current enrolment of 386 pupils.

School Demand

- 4.1.13 According to the School Place Planning Strategy 2018-22, the population of primary age children in Medway from 20,708 in Spring 2009 to 23,966 in Spring 2017, demonstrating considerable growth.
- 4.1.14 Additionally, the secondary age population is forecasted to increase from 18,774 in 2018 to 21,635 by Spring 2024 and there is a large increase forecasted for 2027.
- 4.1.15 According to the Department for Education (DfE) in England the average number of students per household in new homes is 0.25 primary and 0.13 secondary school places. With this in mind, a development of c.800 dwellings would expect an increase of 200 primary and 104 secondary school pupils.
- 4.1.16 Strood Academy, the secondary school located nearest to the site, has a spare capacity of 198 pupils, meaning that the anticipated 104 additional secondary pupils could be accommodated into Strood Academy, and thus, rendering provision of a new secondary school unviable.

1. Pupil Numbers www.get-information-schools.service.gov.uk/Establishments

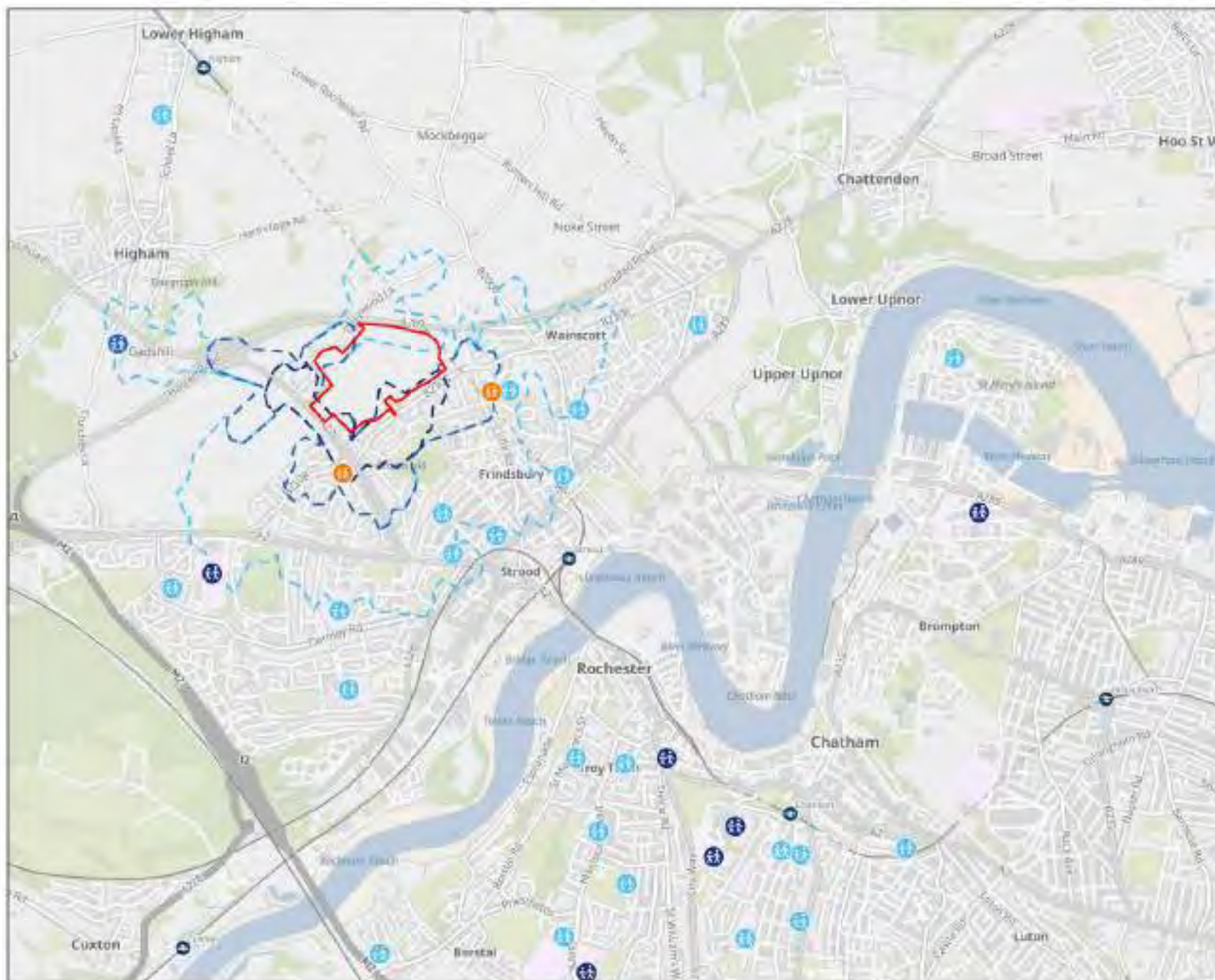
4.1.17 Simultaneously, the closest three primary schools to the site do not have the capacity to accommodate the anticipated 200 additional primary school pupils. As such, there is a need for a new primary school.

CONCLUSIONS

- 4.1.18 It is said that approximately 775no. 2-bedroom dwellings will be expected to provide a new school, rather than developer contributions.
- 4.1.19 Depending on the size of the development (thought to be c. 800 dwellings), it is highly likely that a new school will be required.
- 4.1.20 Depending on updated housing targets, a new school may also be justifiable if targets are increased, and more houses are delivered.
- 4.1.21 The site expects an increase of 200 primary school pupils meaning the provision of a new primary school is recommended.

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2024/2025
1	Gads Hill School	1.4	20	6	2	386

Table 8: Mixed Schools in proximity



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- P Post Primary
- M Mixed
- P Primary
- SEN SEN

4.0 Social Infrastructure

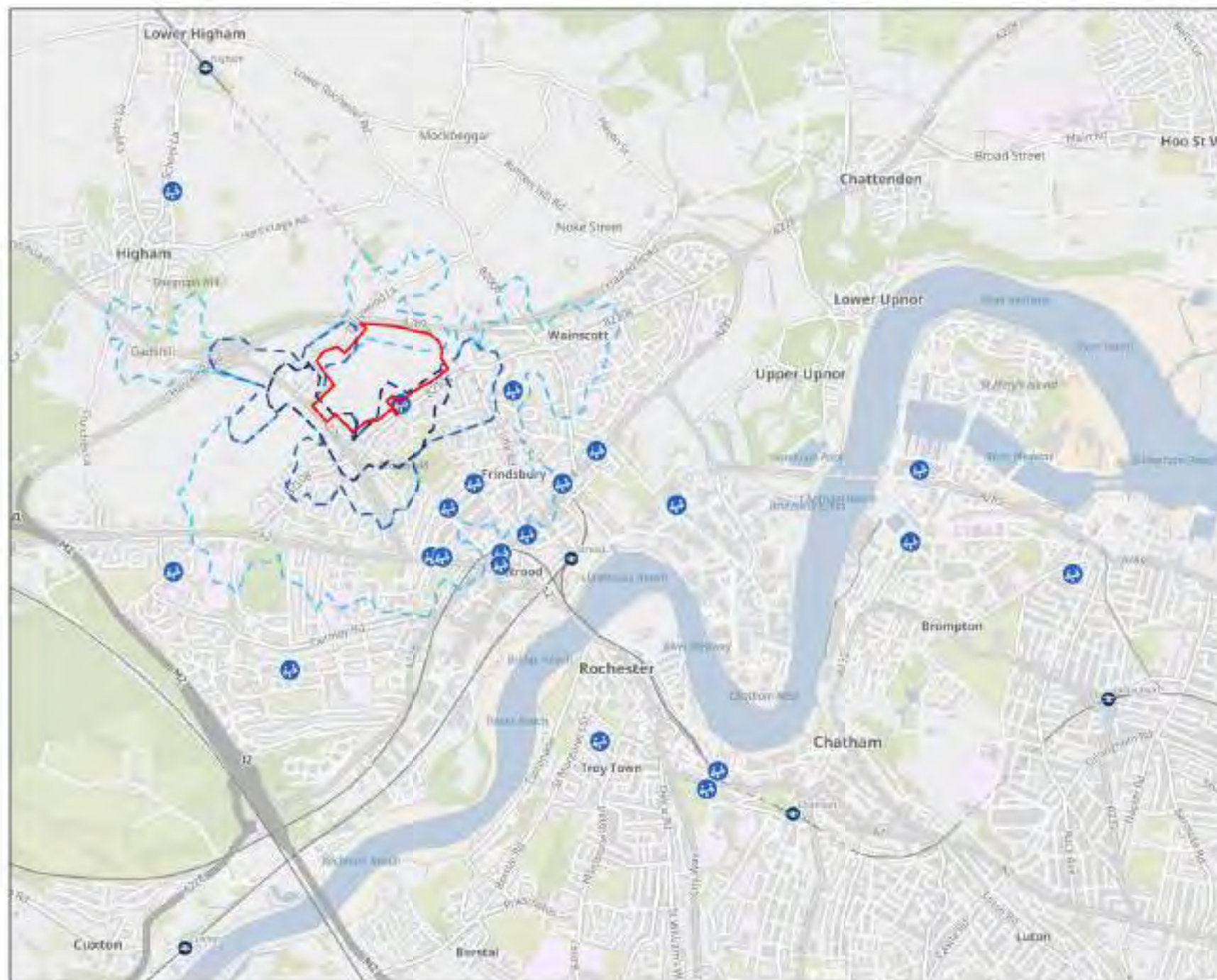
2.2 Childcare Facilities

- 2.2.1 Grace's Childcare (Childminder) is located immediately outside of the site's southern boundary.
- 2.2.2 There is pediatrician located to the east of the site (approximately 0.5km /6 min walk).
- 2.2.3 The nearest nursery to the site is Temple Mill Children's Centre, which is 1km from the site (3 minute drive/13 minute walk).
- 2.2.4 Other nearby nurseries include Witty Kiddies Strood, which is 1.18km southeast from the site (approximately 25 minute walk or 5 minute drive), and Jack & Jill Playgroup which is 1.9km southeast of the site (approximately 25 minute walk or a 6 minute drive).
- 2.2.5 There are approximately 15no. childcare facilities located within Strood.
- 2.2.6 Between the 2011 and 2021 census, the proportion of population aged 4 years and below has decreased from 6.5% to 6.2%.
- 2.2.7 However, depending on the type of dwellings (e.g. higher proportion of 3+ bedrooms), it may lead to an increase in pressure on present capacity of childcare facilities.

- 2.2.8 Knights Place Rec Play Area has been highlighted as a site that could be expanded to help address the gap in children and youth provision
- 2.2.9 None of the youth and children provision sites are of low value (i.e. below 20%)

No.	Primary School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)
1	Graces Childcare	0	1	0	0
2	Temple Mill Childrens Centre	0.8	12	4	3
3	Cherubs Montessori	1.3	16	3	3
4	Castle View Childrens Day Nursery	1.3	18	3	3
5	Witty Kiddies Strood	1.6	22	7	4
6	Gordons Childrens Academy, Infant	1.6	22	5	5

Table 9: Childcare Facilities



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- + Children's facilities

4.0 Social Infrastructure

4.3 Healthcare

Pharmacies

- 4.3.1 According to the Medway Pharmaceutical Needs Assessment (2022), there are a total of seven pharmacies in Strood, broken down into five 40-hour pharmacies (second lowest behind Medway Peninsula), one 100-hour pharmacy, and one distance selling pharmacy.
- 4.3.2 Strood has the 3rd lowest pharmacies per 100,000 population (19.5) which is higher than the Medway average (19.3) but lower than the national average (20.5).
- 4.3.3 Additionally, access to pharmacies from the site is limited, with no pharmacies located within an acceptable walking distance from the site. The pharmacy nearest to the site is the Amco Medway Pharmacy, which is an approximate 25 minute walk from the site.
- 4.3.4 The PNA recommends that a rapid review of any area where there is an application to ensure that the needs of the area have not changed in the lifetime of the PNA. This would imply that pharmacy provision is not entirely secure.
- 4.3.5 The proposed development of c.800 dwellings therefore would create significant pressure upon the existing pharmacies within

Strood and provision of a new pharmacy as part of the development should therefore be considered.

General Practice Surgeries

- 4.3.6 There are a total of 40 General Practice surgeries (GPs) in Medway.
- 4.3.7 Despite this high number, there appears to be a significant demand for more accessible GP surgeries. As part of survey to inform the Medway Joint Local Health and Wellbeing Strategy 2024-28, approximately 18% of respondents included 'better access to GP services' within their top five rankings, when asked to order what they think is the most important to improving health and wellbeing in Medway.
- 4.3.8 The perceived lack of accessible facilities is reflected within Strood. There are currently no GPs within acceptable walking distances, with the nearest GP being Court View Surgery, which is an approximate 26 minute walk south, or a 6 minute drive.
- 4.3.9 Based on the locations of other medical practices, the site would be an ideal location for a new medical practice. Additionally, the proposal for c.800 dwellings would exacerbate any local pressures on existing medical practices. However, any proposal for a GP surgery would need to be informed by a Needs Assessment.
- 4.3.10 Overall, subject to a Needs Assessment, there is potential for a new medical practice to be incorporated into the development.

The location of the would be ideal to serve the people of the proposed development and would provide a more convenient access to a medical practice to those living in the immediate vicinity of the development.

Dentistry

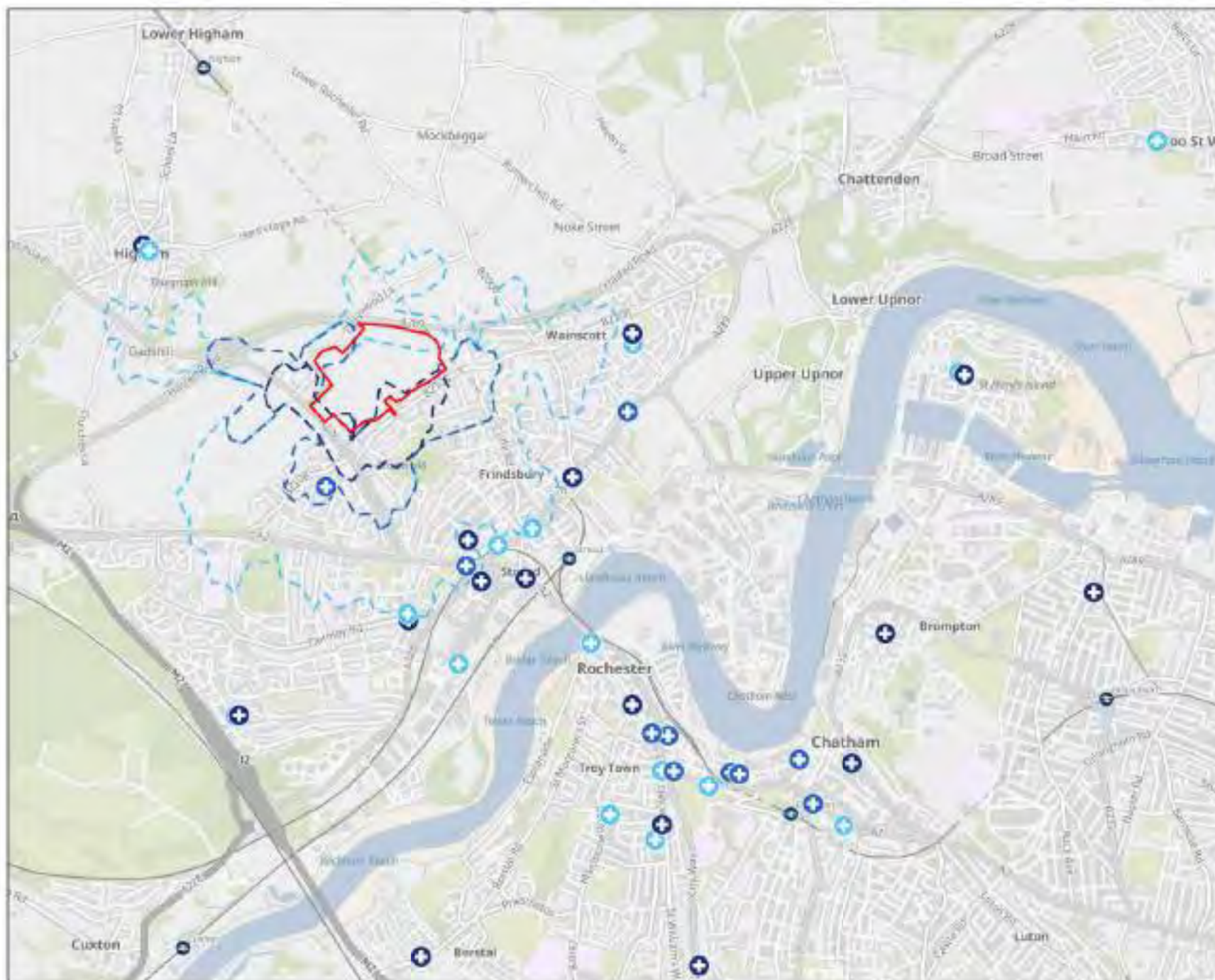
- 4.3.11 There are 5 dental clinics within Strood, with the nearest being Louise Lunness-Barnes Dental Clinic, which is an approximate 15 minute walk southwest from site. The other dental clinics are all outside of an acceptable walking distance from the site.
- 4.3.12 As part of the Medway Integrated Care Strategy, Shared Outcome 4 cites a commitment to improving access to healthcare services, including dental clinics.
- 4.3.13 The proposed c.800 dwellings would likely create additional pressure for the existing dental clinics in Strood, particularly Louise Lunness-Barnes Dental Clinic, which is located nearest to the site.
- 4.3.14 A Needs Assessment would be required to fully establish whether the proposed c.800 dwelling development would result in a need for a new dental clinic.

Summary

- 4.3.15 There are multiple accounts of evidence that access to healthcare services, such as GPs, pharmacies and dental practices, among others, requires improvement.
- 4.3.16 There is only two dentist located within an acceptable walking distance from the site, and no other healthcare facility is within an acceptable walking distance.
- 4.3.17 There is scope to incorporate a GP surgery as part of the proposed development. Whilst provision of pharmacies in Medway is overall sufficient, and a dental practice being located near the site, both of these should be considered as part of the proposed development with potential for the creation of a 'health hub'.



Louise Lunness-Barnes Dental Clinic



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- + Pharmacy
- + Dentist
- + Medical Clinic

4.0 Social Infrastructure

4.4 Sport Facilities

Grass Pitches Supply

4.4.1 Medway has a total of 165 grass pitches, with the nearest of those pitches located at Rochester United Football Club southwest of the site, which hosts U7s-U13s football teams, Medway District Youth League, and soccer schools, alongside hosting semi-professional football games of Rochester United Football Club.

4.4.2 The supply of grass pitches is shown in Table 10.

	Mini Soccer 5v5	Mini Soccer 7v7	Youth Football 9v9	Youth Football 11v11	Adult Football	Total (%) of total number of pitches)
Good	0	1	0	0	30	31 (18.8%)
Standard	15	14	13	7	60	109 (66.1%)
Poor	3	8	2	3	9	25 (15.2%)
Total (% of total number of pitches)	18 (10.9%)	23 (13.9%)	15 (9.1%)	10 (6.1%)	99 (60%)	165

Table 10: Grass Pitches. Source: 4global site assessments

Grass Pitches Demand

4.4.3 Currently, there are 388 football teams within Medway. Of these 388 teams, 51 are situated within Strood and Rural. The age categories of these teams are broken down in Table 11.

4.4.4 According to the Playing Pitch Strategy Needs Assessment, the club to team ratio in Medway (1:4.5) is higher than the national average (1:3.3) which signifies an increased demand for playing pitches in Medway compared to the national average.

Sub Area	Adult		Youth Teams				Mini Teams		Total
	Men’s	Ladies	Boys		Girls		Mini Soccer		
			11v11	9v9	11v11	9v9	7v7	5v5	
Strood and Rural	15	0	9	7	0	0	10	10	51

Table 11: Team profile for football in Strood and Rural

- 4.4.5 Forecasting predicts that there will be an additional 61 football teams by 2035, including approximately 17 additional adult men's football teams and 16 additional youth boys football teams (figures rounded up). Strood and Rural is forecasted to have the third largest increase in football teams by 14 additional teams, almost a quarter of all new football teams by 2035.
- 4.4.6 Latent demand in Strood and Rural includes generation of another 6 teams, which includes two adult teams for Medway Lions, two adult teams for Riverside and two U16s teams for Woodpeckers FC.
- 4.4.7 In addition to team generation, existing playing pitches are also experiencing overplay, measured in Match Equivalent Sessions (MES), where the recorded demand for a pitch exceeds the weekly carrying capacity of that pitch.
- 4.4.8 Strood and Rural has the second highest amount of overplay on existing pitches and the second lowest available spare capacity of 11v11 adult pitches. Strood and Rural currently has the highest deficit of overplay of 24 MES with the deficit set to increase to 28 by 2035. This suggests that there is a high demand for 11v11 adult playing pitches.
- 4.4.9 11v11 youth playing pitches are also projected to have a deficit of 4.51 MES by 2035.
- 4.4.10 Pitches for other categories of football, including 9v9 youth and mini 7v7 and 5v5 pitches within Strood and Rural, are



Rochester United FC

projected to have surplus capacity by 2035.

- 4.4.11 Overall, it is thought that the development presents an opportunity to satisfy current and future demand of 11v11 adult and youth playing pitches, and to alleviate the overplaying of existing football pitches, which should be undertaken.

Artificial Grass Pitches Supply

- 4.4.12 A total of 9 artificial grass pitches (AGP) have been identified within Medway which are split by the following:
- Two 11v11 (youth and adult) pitch;
 - One 9v9 pitch;
 - Three 7v7 pitches;
 - Three 5v5 pitches.

4.4.13 The nearest AGP to the site is at Strood Academy, which is located 1.8km southwest of the site, an approximate 26 minute walk.

Artificial Grass Pitches Demand

4.4.14 The Football Association's (FA) suggested ratio of fully sized AGPs to football teams is 1:38. Given that there are only two fully sized AGPs within Medway and a total of 338 football teams in Medway, this results in a deficit of nine fully sized AGPs.

4.4.15 Despite the deficit, there is demand for only five (rounded) full sized AGPs by 2035 has been identified. Of the five pitches, demand for a single AGP (rounded from 0.48) has been identified within Strood and Rural, which is only the fourth largest demand out of the six sub-areas.

4.4.16 In addition, Strood Academy has spare capacity of 31 MES, demonstrating significant additional capacity. Securing a community use agreement for use of this pitch would satisfy the low demand within Strood and Rural without the need to build a new AGP.

4.4.17 Given the low demand of AGPs within Strood, and the high demand of grassroots pitches within Strood, incorporation of an 11v11 grassroots pitch within the proposed development

would likely be more favourable to build than an 11v11 AGP.

Rugby Union Supply

4.4.20 There are a total of 24 sites in Medway that have rugby union pitches. Four of these sites are available for community rugby usage.

4.4.21 The nearest rugby pitch provision to the development site is Lordswood Sport and Social Club, which is one of two rugby pitches in Strood and Rural, the other being Cliffe Playing Field.

4.4.22 The overall quality of rugby pitches across Medway is healthy, with 18 out of 24 rugby pitches being rated as Standard or Higher as part of the site assessments.

4.4.23 Currently, Medway as a whole has a deficit of 9 MES for training pitches, but a surplus capacity of 11 MES for match pitches. Strood's capacity is marginal, with a deficit of 1 MES for training pitches, but a surplus of 1 MES for match pitches.

Rugby Union Demand

4.4.24 A total of five rugby clubs play in Medway, amounting to a total of 40 rugby union teams. Forecasts for additional rugby teams is small, although it is predicted by 2035 that there will

be seven additional rugby union teams by 2035. There is also latent demand of six new rugby union teams of differing age categories.

4.4.25 By 2035, Medway as a whole will experience a deficit in both training (18 MES) and match (5 MES) pitches. Strood's deficit in training pitches will decrease to 3 MES but will still have a 0.5 MES surplus of match pitches. However, there are other areas in Medway, such as Rochester and Chatham, with less capacity than Strood and Rural.

Other

4.4.26 Regarding demand for other forms of playing pitches, the following conclusions can be made:

- The whole of Medway will have a surplus of artificial and grass wickets by 2035, with Strood and Rural projecting to have the second largest surplus out of the sub-areas (behind Rainham);
- Future demand for hockey teams is relatively low, and despite hockey pitches being oversubscribed on Saturdays (3.75 MES), there is plenty of spare capacity to accommodate demand on weekdays (39 MES) and Sundays (6.5 MES) by 2033;
- Three out of four bowls clubs consulted stated that they

are steadily losing members, with the RACS Bowling Club collapsing due to a lack of members;

- Approximately 79% of public tennis court capacity is utilised in Medway, compared to the national average of 53%, although this utilisation would increase to 94% by 2035 based on population increase forecasts.

Summary

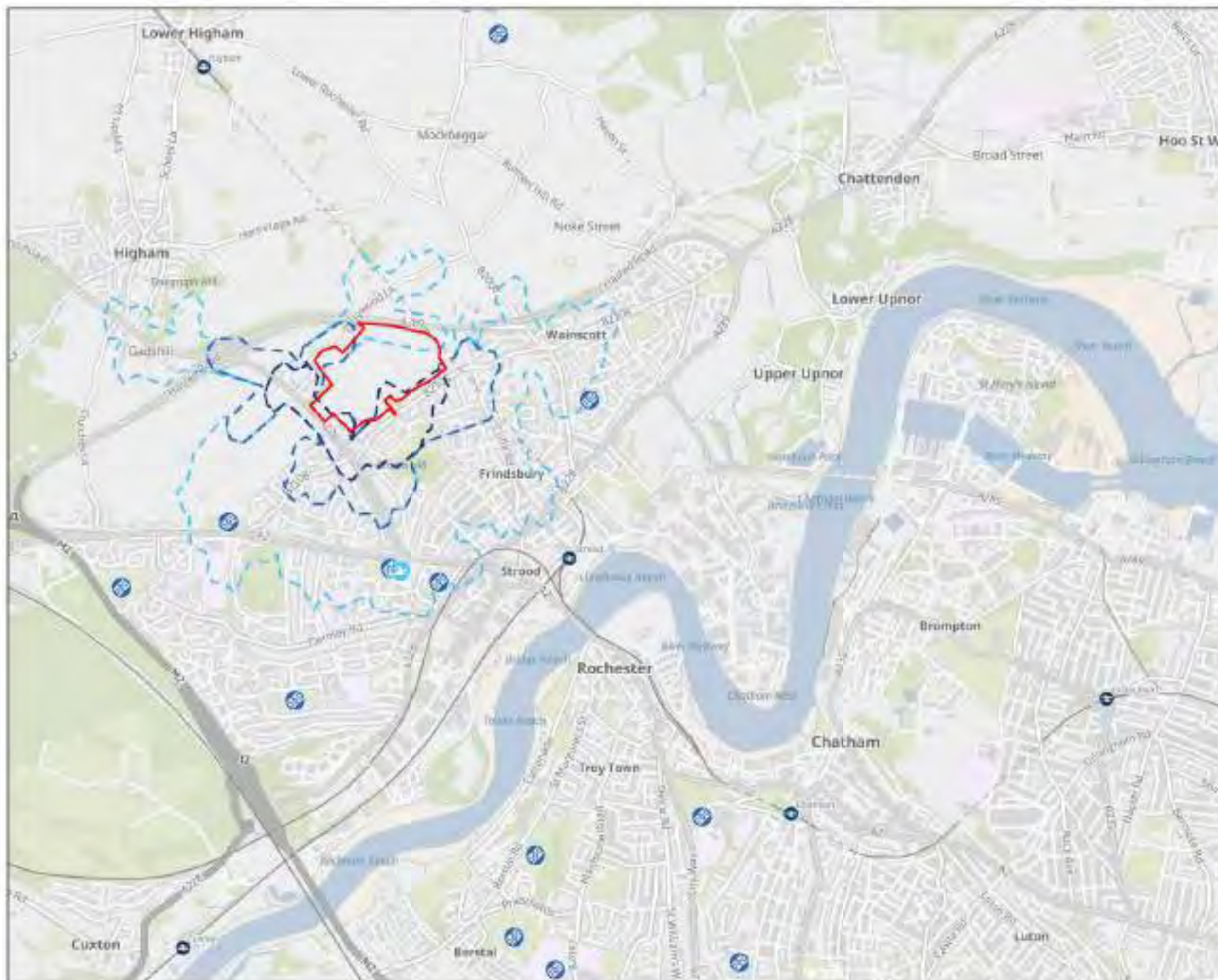
4.4.27 Overall, by far the largest demand for playing pitches comes from football clubs.

4.4.28 In particular, there is significant current demand for adult 11v11 football pitches and 11v11 youth football pitches, which is expected to increase by 2035.

4.4.29 Demand for grass pitches is higher than AGPs, although a community use agreement at Strood Academy's AGPs would provide an artificial pitch with high capacity to the community.

4.4.30 There is an overall demand for training and match rugby pitches within Medway, although this demand is lower than football pitches, and there are other sub-areas within Medway with larger demand than Strood and Rural.

4.4.31 Other sports clubs in Strood and Rural don't have a significant demand for additional capacity of playing pitches.



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Sports
- Leisure Centre

4.5 Open Space

Local Policy & Assessment

4.5.1 Policy L4 of the Medway Local Plan states that:

"Residential development likely to be occupied by 100 people or more shall include well located local open space for formal recreation on-site at a standard equivalent to 1.7 hectares per 1,000 population and open space for children's play and casual recreation on-site at a standard equivalent to 0.7 hectares per 1,000 population. Provision of some or all of the formal open space off-site or the improvement or extension of an existing off-site facility will be permitted where the council is satisfied that this would be a better alternative;"

4.5.2 Policy of the Emerging Local Plan states that residential-led developments will be required to provide new open space and playing pitches according to the following accessibility and quantity standards shown in Table 12.

4.5.3 Alongside the Local Plan Policies, the Council's Open Space Assessment (2024) has been used to inform the provision and quality of various open spaces, in which the subsequent section discusses.

Open Space Type	Catchment	Quantity per 1,000 people
Parks and Gardens	9-minute walk time (710m)	0.80 ha
Natural and Semi-Natural Green-space	9-minute walk time (720m)	3.09 ha
Amenity Greenspace	6-minute walk time (480m)	0.80 ha
Local Area of Play (LAP)	1-minute walk time (100m)	0.25 ha
Local Equipped Area for Play (LEAP)	5-minute walk time (400m)	
Neighbourhood Equipped Area of Play (NEAP)	12.5-minute walk time (1,000m)	
Other Provision	9-minute walk time (700m)	
Allotments	No Standard Set	0.25 ha

Table 12: Accessibility and quantity standards

Parks

4.5.4 Strood has the lowest provision of public parks and gardens per 1,000 population, amounting to 0.19ha per 1,000 population as a result of 1 park (Broomhill Park) totalling 4.52ha.

4.5.5 The site is located within close proximity to Broomhill Park, although is not fully contained within the 9 minute walk target.

4.5.6 Broomhill Park scores highest out of any park in Medway on quality (78.5%).

Natural and Semi-Natural Green space

- 4.5.7 Out of 60 sites in Medway, Strood has just 1 site (Rede Common) amounting to 11.03ha which is the second lowest in Medway. Additionally, the site is not located within the 9 minute walk target.
- 4.5.8 Similarly, to Broomhill Park, Rede Common scores highly in quality (72% - 6th highest out of 60 sites).

Amenity Greenspace

- 4.5.9 Out of 165 sites, Strood has 23 amenity greenspace sites, amounting to a total of 18.85ha and an overall provision of 0.78ha per 1,000, just below the Medway average.
- 4.5.10 The vast majority of Strood is covered by the 480m catchment area (6 minute walk) for amenity green spaces, with few sparse pockets where the area isn't covered by the catchment area.
- 4.5.10 However, 20 out of the 23 amenity greenspaces within Strood were categorised as 'low quality'.

Provision for Children and Young People

- 4.5.11 Out of 163 sites in Medway, Strood has 15 sites for children and young people totalling 0.96ha, or 0.04ha per 1,000 people.
- 4.5.12 Strood has 10 LEAP and 5 casual/youth sites but has no LAP or

NEAP provision.

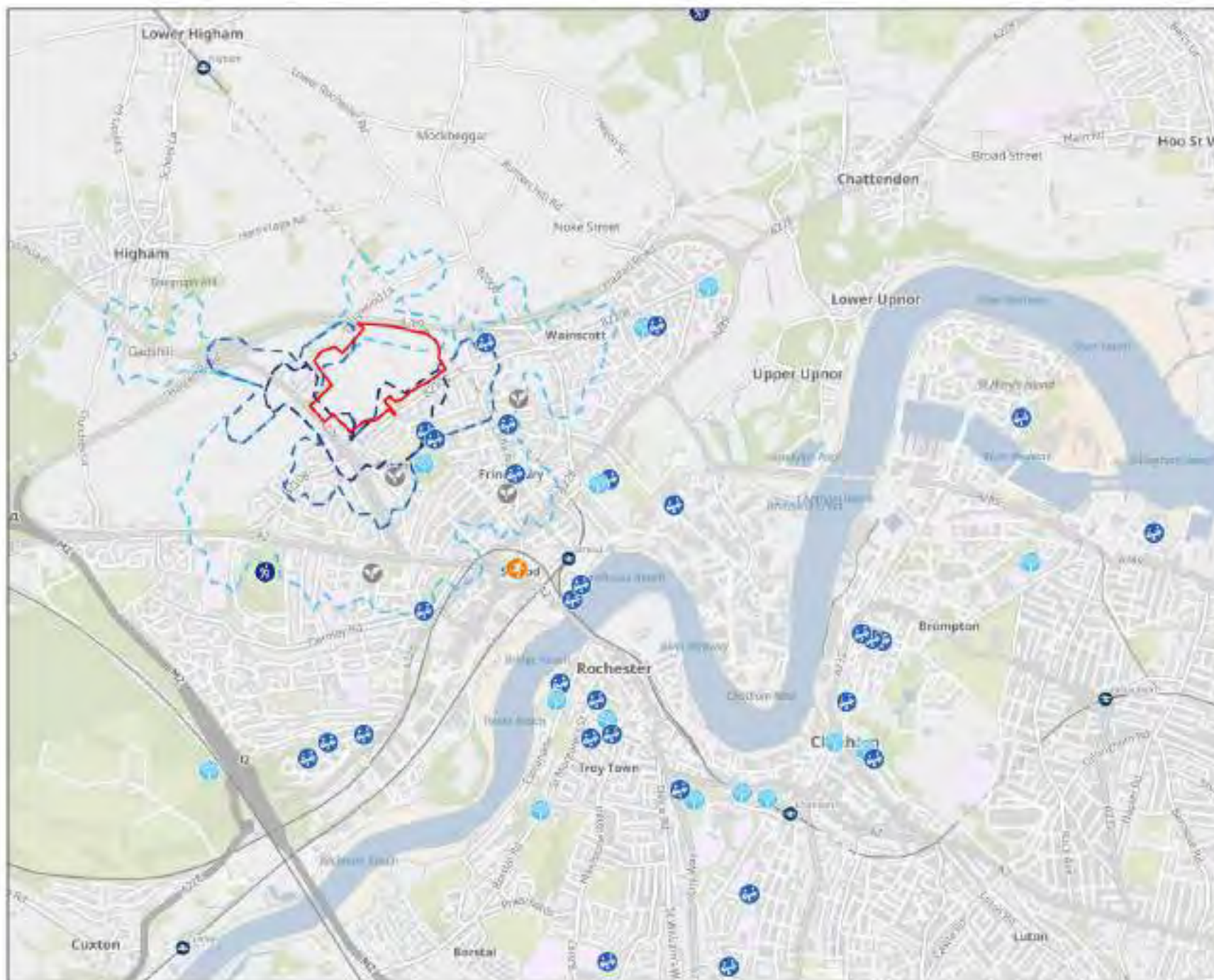
- 4.5.13 The overall quality of youth and children is mixed but generally good, with 10 sites scoring over 60% in terms of quality, and 5 sites scoring below 60%.

Allotments

- 4.5.14 Medway contains a total of 38 allotments, with Strood containing just four of these sites.
- 4.5.15 The closest allotment to the site is Broomhill Road, which is approximately 0.6km south of the site, or an approximate 4 minute walk.
- 4.5.16 Overall, there is no significant demand for allotments, but they should be highly valued within the community.

Summary

- 4.5.17 According to local policy, provision of open space is required as part of any residential development.
- 4.5.18 Strood contains no provision of Local Play Areas or Neighbourhood Equipped Areas of Play and provision of such amenities would be appropriate.
- 4.5.19 Due to the lower numbers of parks and natural/semi-natural greenspaces, provision of such amenities would be appropriate.



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- ★ Trail
- ★ Playground
- Park
- ★ Civic Space
- ★ Allotments

4.0 Social Infrastructure

4.6 Social, Community, & Faith

4.5.1 There are several different community facilities and services within proximity of the site. For places of worship there are several churches in Strood, in Rochester there's a Synagogue and a Mosque.

4.5.2 There are no libraries or community centres within walking distances however the closest library is the Medway Archives Centre located approximately 1.4km (22 minute walk) and the closest community centre is All Saints Parish Hall located approximately 1.8km (24 minute walk) from the site.

Cemetaries & Churchyards

4.5.3 Out of 79 cemeteries which provide a total of 67.87ha in Medway, 6 are located in Strood and provide 6.65ha.

4.5.4 The cemeteries include:

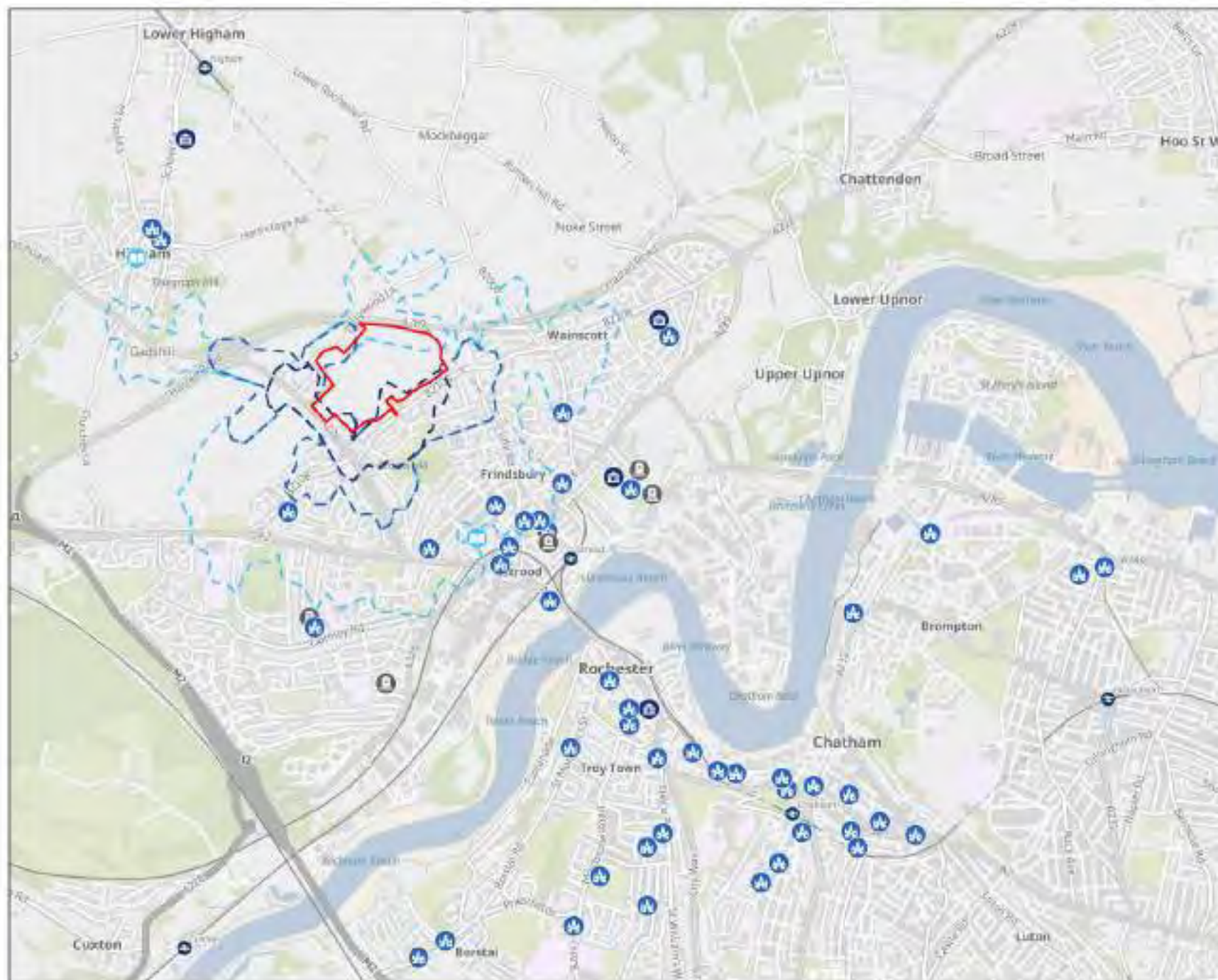
- All Saints' Church Cemetery, Frindsbury – 0.79ha;
- All Saints' Church, Frindsbury – 1.04ha;
- New Testament Church of God – 0.26ha;
- St Francis of Assisi Church – 0.31ha.



Medway Archive Centre



All Saints Parish Hall



Key

- Site Boundary
- 5 Minute Walk Distance (400m)
From The Site Access
- 10 Minute Walk Distance (800m)
From The Site Access
- 20 Minute Walk Distance (1600m)
From The Site Access
- Community Centre
- Special Workshop
- Library
- Cemeteries

4.0 Social Infrastructure

4.7 Convenience Retail

Convenience Stores

- 4.7.1 The nearest convenience store to the site is the Tesco Esso Express, located at a petrol station, offering a limited range of goods. The store is approximately 0.5km from the site, amounting to an approximate 3 minute walk. There are few other convenience stores located within appropriate walking distance of the site, of which are limited in size.
- 4.7.2 According to the SHENA Retail and Commercial Leisure Assessment, there are three larger food stores within Strood district centre, two



Tesco Superstore

of which are stronger performing, operated by Morrisons and Tesco.

- 4.7.8 The Morrisons store in particular is large and modern with a wide range of fresh food counters, whilst the Tesco store is rather dated, with a limited but reasonable product range devoted almost wholly to convenience goods.
- 4.7.9 The Retail and Commercial Assessment cites that Strood district centre is struggling for viability and vitality more than other areas in Medway. However, any proposals for a new convenience store would need to be informed by a retail impact assessment, regardless of size.



Morrisons

Pubs and Restaurants

- 4.7.10 The closest pub to the site is The Coach & Horses, which is located approximately 1.3km south of the site, amounting to an approximate 17 minute walk.
- 4.7.11 Other pubs located within an approximate 20 minute walk from the site include The Ship and the Weston Arms.
- 4.7.12 The nearest restaurant to the site, which is located 1km southwest from the site which is an approximate 15 minute walk.
- 4.7.13 Other takeaways in the surrounding area include Good Luck Chinese Takeaway, Papa John's, McDonalds, Domino's and Cobham Inn

Summary

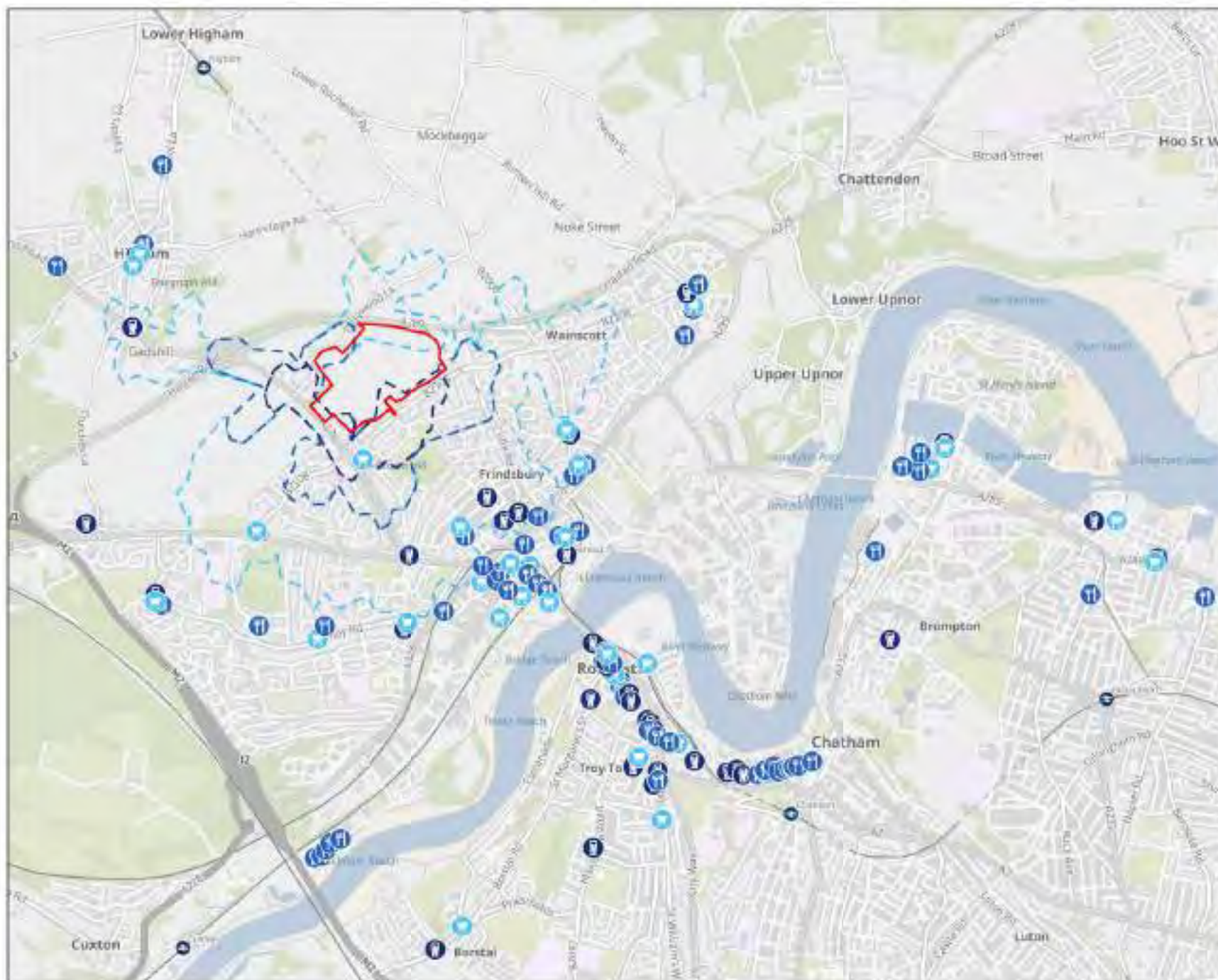
- 4.7.14 Overall, a convenience store as part of the proposed development would be ideally located to serve the c. 800 dwellings, and surrounding areas, however this would need to be informed by a retail impact assessment.
- 4.7.15 Strood appears to be plentiful in pubs and restaurants, and it is unlikely that a new pub or restaurant will be required, especially with other infrastructure being more in demand.



The Coach & Horses



Papa Johns



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- P Pub
- R Restaurant
- S Shop

4.0 Social Infrastructure

4.8 Care Homes

4.8.1 There is a national trend of population ageing. With populations of older people growing, there is an increasing need for provision of care homes.

4.8.2 There are eight elderly care homes within a 20 minute walking distance of the site and 14no. assisted living residences within Strood. The majority of which are listed as assisted living residence, whilst others are nursing home and home care service.

4.8.3 The closest of these care homes is Shaws Wood Residential Care Home which is located 1.2km from the site, which is an approximate 18-minute walk from the site. Whilst walking distance is not necessarily a major factor, it does demonstrate that the site is located in an area that is sparser of care homes, compared to other areas of Strood.

4.8.4 Despite 14 assisted living residences being located within Strood, there is a growing need for provision care homes. The data gathered by the Care Quality Commission (CQC) in 2024 shows that there are a total of 1,465 registered beds for older persons, comprising of the following:

- 670 registered residential care beds

- 795 registered nursing care beds

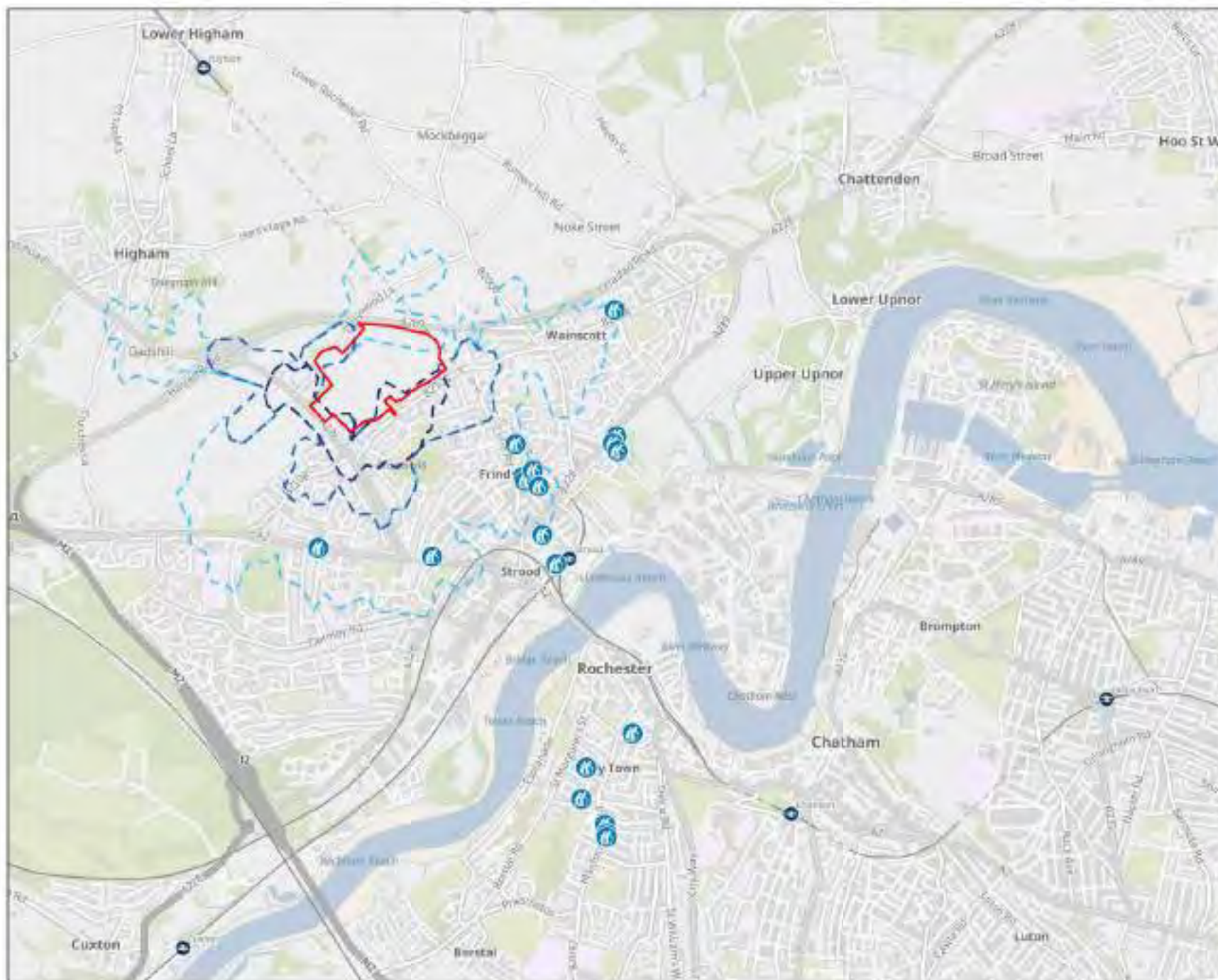
4.8.5 According to the Medway Adult Social Care Local Account 2020/21, by 2025, it is projected that the number of people in Medway aged 65 years and over will increase by 7.1% to 48,400 people, and that the number of people aged 85 years and over will increase by 11.5% to 5,800 people.

4.8.6 The Medway Extra Care Housing Needs Analysis 2011-32 concluded that 'there is clear scope to widen the range of housing and support options available to older people across tenures with the need for specialist housing services to enable the growing number of older people to live independently'.

4.8.7 Evidence to support a growing demand comes from a Needs Assessment, prepared by Carterwood in February 2023 to support a planning application for a 66no. bed care home in Halling (MC/23/0535), which stated that it is anticipated that the gross need for care home beds is expected to rise between 2023 and 2043 by c. 47%. Specialist care homes for those with dementia is also expected to rise.

4.8.8 The Needs Assessment also shows that there is a planned supply of 236 market beds and 76 specialist dementia beds by 2025, however there is no planned supply afterwards.

4.8.9 Overall, there is considerable scope to provide a new care home as part of the proposed development, given the trend of increasing numbers of people aged 65+ years and 85+ years.



Key

- Site Boundary
- 🏠 Care Homes
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access

4.0 Social Infrastructure

4.9 Other

4.7.1 Other services comprise banks, post offices, veterinary clinics and allotments. The majority of which are located south of the site towards Rochester.

4.7.2 The closest bank is Kent Reliance located approximately 1.7km (22 minute walking distance) south of the site.

4.7.4 The closest veterinary clinic is the Medway City Veterinary Centre located in the Medway City Estate approximately 3km (41 minute walk/ 8 minute drive).

Post Office

4.7.5 There is a total of 4no. post offices in Strood, with additional post offices located in Rochester and Higham.

4.7.6 The closest Post Office is The Temple Post Office which is located approximately 1.7km (22 minute walking distance) south of the site.

4.7.7 There are also a number of drop-off locations within Strood, although the closest location to the site is Frindsbury Drop & Collect Post Office, which is approximately 1.6km from the site which equates to an approximate 21 minute walk or a 5 minute drive.

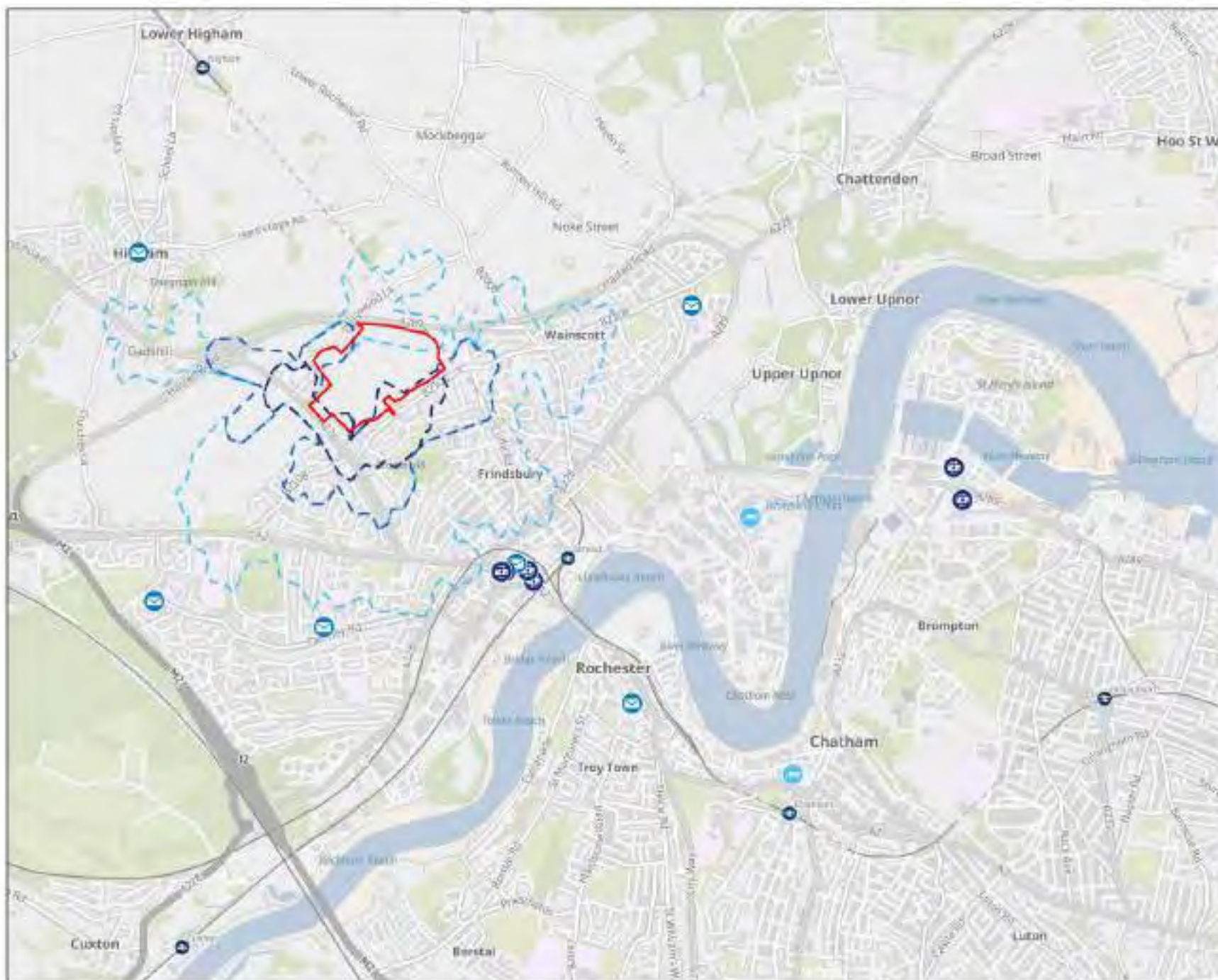
4.7.8 Geographically, the location of a post office as part of the proposed development would not be inappropriate.



Kent Reliance



The Temple Post Office



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- B Bus
- PO Post Office
- W Walk

6.0 Conclusion

6.1 Overview

6.1.1 Whilst it is difficult to demonstrate that provision of certain facilities will be appropriate as part of any development at Land north of Brompton Farm without any formal and thorough assessments, this report has studied the supply and demand of various facilities within Medway, and Strood, where the site is more specifically located within Medway.

6.1.2 The following conclusions of note can be made:

- There are conflicting reports about Green Belt Parcel 2, with Medway Council citing high contribution to the purpose of the Green Belt (without providing evidence) and Scarp Landscape suggest a much more limited contribution – an updated Green Belt Assessment is currently being prepared.
- Given the amount of proposed housing, it is likely that a new build school will be required rather than developer contributions, as set out by Medway's School Place Planning Strategy 2018-22. Due to the current capacity of nearby schools this is recommended to be a primary school.
- Despite higher no. of pharmacies per 100,000 than the national average, it is recommended that provision of pharmacies is reviewed should any significant residential developments.
- Geographically, provision of a new GP would alleviate the potential stress that a c.800 dwelling development would bring about, although this would need to be informed by a Needs Assessment and some of the challenges that GPs face in Medway include staffing and increased running costs.
- There is a very high current and future demand for 11v11 grassroots pitches, as well as moderate demand for 11v11 AGP pitches, although the AGP demand could be satisfied by a community use agreement with Strood Academy.
- With the exception of rugby union pitches, the level of demand for playing pitch provision of other sports is generally much lower.
- Regarding indoor sport provision, there is a preference to upgrade and refurbish existing facilities, rather than building new facilities.
- Given Strood's urban nature, the area is generally lagging behind other areas regarding quantity open space, however provision of green space

can be easily achieved.

- Any retail development would have to be informed by a Retail Impact Assessment, however, there does not appear to be a larger food store within close proximity to the site (closest is a Tesco Esso Store at a petrol station), especially when the primary larger food stores are located in the south of Strood.
- Based on the most recent Needs Assessment and other evidence documents, there appears to be a general demand for care home/elderly accommodation provision and incorporation of a care home/elderly accommodation element would be sensible, although a Needs Assessment would be required to be undertaken to determine the present needs.
- There appears to be good provision of childcare facilities and provision of such is likely not a high priority, although a development of c. 800 dwellings will likely increase the pressure on existing facilities.
- The location of a new post office within Brompton Farm as part of any development would not be inappropriate, although there appears to be sufficient childcare facilities (i.e. nurseries) provision within Strood to serve the site.

APPENDIX

2



TRANSPORT TECHNICAL NOTE

JOB REF.

PL/AH/32314

CLIENT

Bellway Homes (Strategic) Ltd.

SITE

Land North of Brompton Farm Road, Strood, Medway

1.1 INTRODUCTION

- 1.1.1 This Transport Technical Note (TTN) has been prepared in support of representations by Bellway Homes (Strategic) Ltd. to the Medway Local Plan 2040 Regulation 18 consultation in relation to Land North of Brompton Farm Road, in Strood, which is being promoted for residential development.
- 1.1.2 The current proposals are for the development of approximately c. 800 dwellings, a school and a neighbourhood centre containing small retail units and a medical hub. This TTN outlines the proposed multi-modal access strategy, considers the accessibility of the site, quantifies the likely vehicular trip generation of the development and identifies appropriate and proportionate mitigation measures.

1.2 PROPOSAL SITE

- 1.2.1 The site is located to the east of the A226 Gravesend Road and to the south of the A289 Hasted Road, approximately 1.9km north-east of Strood and 3.2km north-west of Rochester town centres. The location of the site within a local context is shown in Figure 1 overleaf.



FIGURE 1: SITE LOCATION WITHIN LOCAL CONTEXT (COURTESY OF GOOGLE MAPS)

- 1.2.2 The site currently comprises agricultural land, with access achieved to the north-west via Dillywood Lane and to the south-east via Strodes Close.
- 1.2.3 The site is bound to the north by Dillywood Lane and the A289, to the east by agricultural land, Stonehorse Lane and residential dwellings on the B2108 Brompton Farm Road, to the south by residential dwellings on the B2108 Brompton Farm Road, and to the west by dwellings on the A226 Gravesend Road.

1.3 DEVELOPMENT PROPOSALS

- 1.3.1 The proposals comprise the development of up to 800 residential dwellings, a school and a neighbourhood centre containing small retail units and a medical hub, together with associated access, landscaping and open space. The indicative layout plan is included at **Appendix A**. The locations of the proposed access points can be seen in Figure 2 overleaf, with vehicular access points denoted in red and pedestrian-only access points denoted in yellow. It is noted that pedestrian access will also be achievable via the vehicular access points.



FIGURE 2: PROPOSED SITE ACCESS POINTS (COURTESY OF GOOGLE MAPS)

- 1.3.2 Two vehicular access points are proposed; with the principal access from the A226 Gravesend Road and a secondary emergency, pedestrian and cycle access from Strodes Close.
- 1.3.3 An indicative design of the principal access from the A226 Gravesend Road has been prepared and is included at **Appendix B**. Due to the scale of the proposed development, it is considered that this access would need to take the form of a signalised junction. The feasibility design demonstrates how this access could also serve the land to the west of the site, which is being promoted for residential development by Barratt David Wilson (BDW).
- 1.3.4 The signalised junction would incorporate controlled pedestrian crossings, providing access to the existing bus stop on the western side of Gravesend Road, as well as the potential BDW development.
- 1.3.5 As part of the proposals, the footway on the northern side of Gravesend Road would be widened and upgraded to a shared footway / cycleway, which would extend south to the junction with the B2108 Brompton Farm Road.
- 1.3.6 Pedestrian access to the site would be achievable via a total of six access points; four of which are existing Public Rights of Way (PRoW) that would be retained and enhanced. The remaining two pedestrian accesses would be newly constructed, with one located off Dillywood Lane to the north of the site and one off Brompton Farm Road to the south.
- 1.3.7 The site access and internal layout will give consideration to Local Transport Note 1/20 and Manual for Streets guidance with respect to pedestrian and cycle infrastructure. The layout would include a shared footway/cycleway alongside the spine road.

1.4 PEDESTRIAN AND CYCLE ACCESSIBILITY

- 1.4.1 An existing footway measuring approximately 2.0m in width is provided along the eastern side of the A226 Gravesend Road, which is subject to street lighting to aid pedestrian movements during the hours of darkness. This footway routes between the Gads Hill Interchange to the north-west to the A226 Gravesend Road / A2 Watling Street junction to the south, from where onward connectivity into Strood town centre is available.
- 1.4.2 Further footways measuring approximately 2.0m in width are provided on both sides of the B2108 Brompton Farm Road. These footways are also subject to street lighting and provide connectivity towards Wainscott.
- 1.4.3 It is noted that a formal crossing point is not currently provided on the Brompton Farm Road arm of the A226 / B2108 signalised junction, which would be addressed as part of the proposed development to enhance the pedestrian route into Strood.
- 1.4.4 As has been noted, there are also a number of PRoW in the vicinity of the site; one of which crosses the site from north-west to south-east. Figure 3 below shows the PRoW network local to the site, which is highlighted in green.

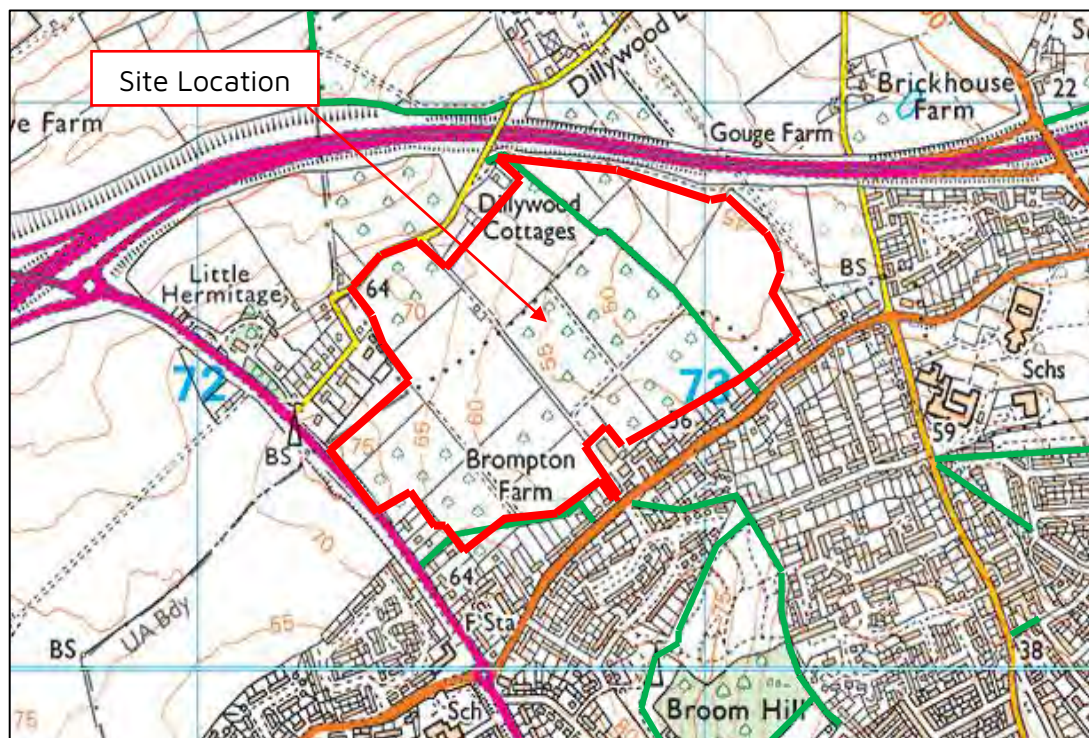


FIGURE 3: PROW NETWORK LOCAL TO THE SITE (COURTESY OF MEDWAY MAPS)

- 1.4.5 Figure 4 overleaf displays the cycle network local to the site, where local cycle routes are highlighted in blue and National Cycle Routes are highlighted in red.

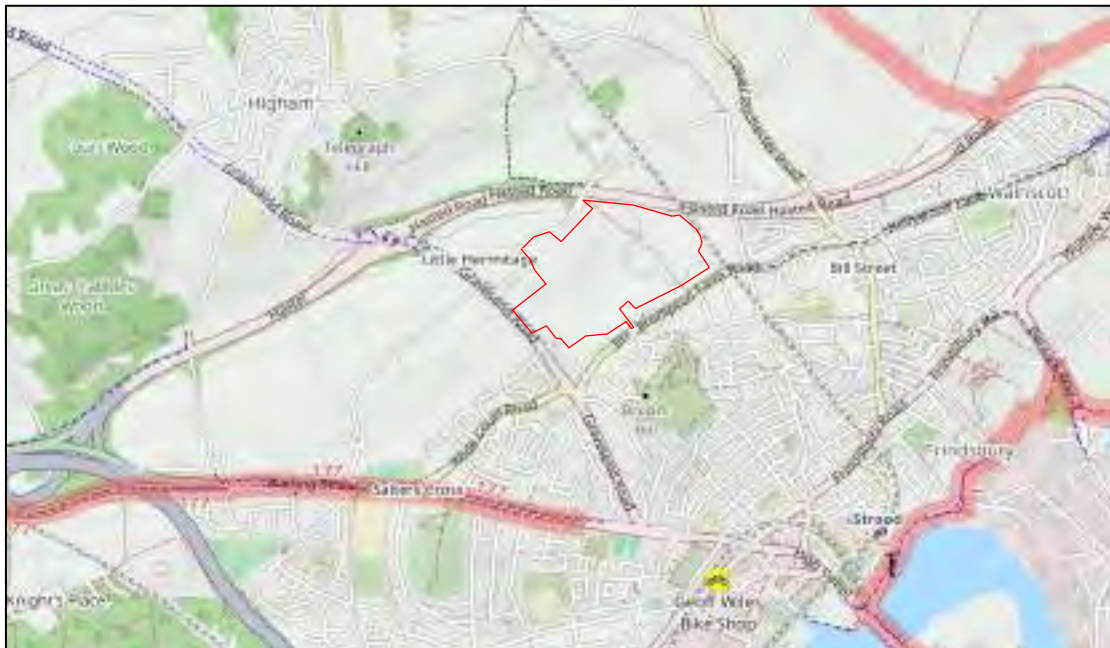


FIGURE 4: CYCLE NETWORK LOCAL TO THE SITE (COURTESY OF OPENCYCLEMAP.ORG)

- 1.4.6 It is noted that on-carriageway cycle lanes are present on the A226 Gravesend Road, routing north-westwards towards Gravesend. It is further noted that National Cycle Route 177 is accessible from the A2 Watling Street, approximately 1.1km (or a five-minute cycle time) from the proposed principal site access. National Cycle Route 177 routes north-westwards along the A2 to Gravesend and Ebbsfleet.
- 1.4.7 National Cycle Route 1 is also accessible from Strood and provides onward connectivity throughout the Medway Towns, as well as along the River Thames to Gravesend and Dartford.
- 1.4.8 As part of the proposed development, improvements would be made to local cycle infrastructure where viable, to seek to contribute to the emerging Medway Local Cycling and Walking Infrastructure Plan (LCWIP). These could include the extension of the existing cycle lanes on Gravesend Road to the junction with Red Court Road. From this junction, a shared footway / cycleway could provide a link to NCR 177 on the A2.
- 1.4.9 Isochrone maps have been prepared to show the available services and facilities that are located within a five, ten and twenty minute walking and cycling distance of the site, which are included at **Appendix C**. These demonstrate that there is the opportunity to access many everyday services and facilities from the site by active and sustainable travel modes.

1.5 PUBLIC TRANSPORT ACCESSIBILITY

- 1.5.1 A pair of bus stops are located on Gravesend Road, approximately 130m (or a one-to-two minute walk) from the proposed principal vehicular access. A further pair of bus stops are present on Brompton Farm Road approximately 42m (or a one-minute walk) from the proposed secondary access.
- 1.5.2 These stops are provided with flags and posts and are accessible via the aforementioned footway infrastructure from the proposed site accesses. Tables 1 and 2 below list the bus routes that are available from these stops, along with the service frequencies.

SERVICE NO.	ROUTE	SERVICE FREQUENCY		
		Weekday	Saturday	Sunday
190	Gravesend - Chatham	2 – 3 per hour	2 – 3 per hour	1 per hour
668	Chalk – Grammar Schools	School service	No service	No service
694	Higham – Grammar Schools	School service	No service	No service

TABLE 1: BUS SERVICES AVAILABLE ON GRAVESEND ROAD

SERVICE NO.	ROUTE	SERVICE FREQUENCY		
		Weekday	Saturday	Sunday
172	Wainscott – Strood - Chatham	3 per day	No service	No service
633	Cliffe – Grammar Schools	School service	No Service	No service
673	Cuxton – Hoo Academy	School service	No service	No service
689	Darnley Arch – Hundred of Hoo Academy	School service	No service	No service
694	Higham – Grammar Schools	School service	No service	No service

TABLE 2: BUS SERVICES AVAILABLE ON BROMPTON FARM ROAD

- 1.5.3 As part of the proposed development, these bus stops would be provided with sheltered waiting facilities and as has been noted, a controlled pedestrian crossing and footway will be provided to the stop on the western side of Gravesend Road. The potential to provide a new or enhanced bus service through the site between Gravesend Road and Brompton Farm Road would also be explored.
- 1.5.4 The nearest railway station to the site is Strood, which is located approximately 2.0km (representing a 26-minute walk or a nine-minute cycle) from the proposed secondary site access on Strodes Close. This station is afforded disabled parking, step-free access and cycle storage in the form of covered Sheffield stands for 40 cycles. Table 3 below lists the direct train services that are available from this station along with their weekday and weekend frequencies.

SERVICE	SERVICE FREQUENCY		
	Weekday	Saturdays	Sundays
Luton via London Blackfriars	2 per hour	2 per hour	No direct service
Ramsgate	1 per hour	1 per hour	1 per hour
Rainham	4 per hour	3 per hour	3 per hour
Paddock Wood	2 per hour	2 per hour	1 per hour
London St Pancras International	4 per hour	3 per hour	3 per hour

TABLE 3: TRAIN SERVICE AVAILABILITY AND FREQUENCY FROM STROOD RAILWAY STATION

1.6 SITE ACCESSIBILITY

- 1.6.1 A number of existing services and facilities are available within Strood to the south-east of the proposal site, which can be accessed via the aforementioned pedestrian and cycle routes. These facilities include a café, takeaways, convenience stores, a primary school, a GP surgery, a pharmacy and a post office. Table 4 overleaf lists a selection of these services and facilities along with their approximate distances and walking and cycling times from the proposed primary access point off the A226 Gravesend Road.

FACILITY / SERVICE	DISTANCE	TIME	
		WALKING	CYCLING
Petrol Station – Esso	450m	6 minutes	1 minute
Convenience Store – Tesco Express	450m	6 minutes	1 minute
Dentist – Louise Lunness-Barnes Dental Clinic	800m	10 minutes	3 minutes
Secondary School – Strood Academy	1,500m	19 minutes	6 minutes
Primary School – Temple Mill	1,700m	21 minutes	5 minutes
Takeaway – Mayas Pizza	1,700m	21 minutes	6 minutes
Pharmacy – Bryant Road Pharmacy	1,700m	21 minutes	5 minutes
Public House – The Stone Horse	1,700m	16 minutes	5 minutes
GP – Apex Medical Practice	1,900m	24 minutes	5 minutes
Café – Friends Cafe	1,900m	24 minutes	6 minutes
Supermarket – Aldi	2,000m	25 minutes	6 minutes
Nursery – St Marys Day Nursery	2,100m	28 minutes	7 minutes
Gym – The Gym Group	2,100m	26 minutes	7 minutes
Post Office – Lower Stoke Post Office	2,200m	28 minutes	6 minutes

TABLE 4: FACILITIES AND SERVICES LOCAL TO PROPOSAL SITE

- 1.6.2 The walk times provided above are based on a walk speed of 80m per minute, a figure which is widely used to estimate walk times and used within the London-based Public Transport Accessibility Level (PTAL) analysis. It aims to provide a typical average value that estimates it takes five minutes to walk 400m, ten minutes to walk 800m and so on.
- 1.6.3 The cycle times provided above are based on those provided by the Google Maps tool, which assumes a standard moving speed of 16km per hour for cyclists and takes into account such elements as elevation change and number of junctions crossed on a given route.

1.7 TRIP GENERATION ASSESSMENT

- 1.7.1 The vehicle trip generation of the proposed development has been forecast with reference to the national TRICS trip rate database. To ensure a robust initial assessment of the site, surveys in the category '*03 – RESIDENTIAL, A – HOUSES PRIVATELY OWNED*' have been selected. Survey sites outside of Greater London within England, Scotland and Wales have been considered in 'Suburban' and 'Edge of Town' locations and the population criteria refined to reflect the location of the proposal site. It is noted that all surveys that took place during the period of Covid-19 travel restrictions have been excluded from this activity. The resulting average TRICS trip rates are shown in Table 5 below. The full TRICS report is included at **Appendix D**.

PERIOD	ARRIVALS	DEPARTURES	TOTAL
08:00 – 09:00	0.145	0.371	0.516
17:00 – 18:00	0.341	0.166	0.507
07:00 – 19:00	2.222	2.228	4.450

TABLE 5: TRICS TRIP RATES – HOUSES PRIVATELY OWNED (TRIPS/DWELLING)

- 1.7.2 These trip rates have subsequently been factored by the c.800 dwellings proposed to provide the forecast vehicle trip generation in Table 6 below. Please note that any inaccuracies are the result of rounding in MS Excel.

PERIOD	ARRIVALS	DEPARTURES	TOTAL
08:00 – 09:00	116	297	413
17:00 – 18:00	273	133	406
07:00 – 19:00	1,778	1,782	3,560

TABLE 6: TRIP GENERATION – HOUSES PRIVATELY OWNED (800 DWELLINGS)

- 1.7.3 It is noted that the site could generate up to 413 vehicle trips during the weekday AM peak hour and 406 vehicle trips during the PM peak hour, with a total of 3,560 trips across the twelve-hour working day (07:00-19:00). This equates to 297 vehicle trips per hour on average, or approximately five per minute.
- 1.7.4 Whilst there are also non-residential uses proposed, it is anticipated that the majority of trips attracted to them would be internal to the site.
- 1.7.5 It is further noted that the above assessment can be considered robust due to the use of pre-Covid-19 pandemic trip rates, which do not account for the lower commuting rate of residents post-pandemic, and it has been assumed that 100% of the residential dwellings will be privately owned, thereby resulting in a higher trip rate.
- 1.7.6 As well as the robustness of this assessment, it is reiterated that the site would be afforded access to high quality pedestrian, cycle and public transport infrastructure both internally and connecting to off-site services and facilities, enabling residents to utilise modes of transport other than the private vehicle. The potential on-site primary school and neighbourhood centre would also facilitate the internalisation of many everyday journeys and a site-wide Travel Plan would include both 'soft' and 'hard' interventions to incentivise the use of active and sustainable travel modes.

1.8 TRIP DISTRIBUTION AND ASSIGNMENT

- 1.8.1 A vehicular trip distribution and assignment exercise has been completed using '*Location of usual residence and place of work by method of travel to work*' data from the 2011 Census for Middle-Layer Super Output Area (MSOA) 'Medway 005', in which the majority of the site is located, including the proposed principal vehicular access.
- 1.8.2 It is noted that whilst equivalent data from the 2021 Census has subsequently been released, this was obtained during the Covid-19 pandemic when travel demand was suppressed. The 2011 data has therefore been used in the interest of robustness.
- 1.8.3 On this basis, the total vehicular trip generation set out in Table 6 has been distributed and assigned to the local highway network as summarised in Table 7 overleaf.

JUNCTION	% DISTRIBUTION	AM PEAK HOUR	PM PEAK HOUR
A226 Gravesend Rd / Site Access	100%	413	406
A226 Gravesend Rd / A289 Hasted Rd / Gravesend Rd ('Gads Hill Interchange')	69%	286	281
M2 Junction 1	53%	217	213
A226 Gravesend Rd / B2108 Brompton Farm Rd / B2108	31%	127	124
A2 / A226 Gravesend Rd	15%	61	60
A2 / Station Rd	12%	51	50
A2 / B2108	5%	19	19

TABLE 7: VEHICLE TRIP DISTRIBUTION

- 1.8.4 It is noted that the maximum increase at any one junction would be at the Gads Hill Interchange to the north-west of the site, with an increase of 286 vehicle movements during the weekday AM peak hour and 281 vehicle movements during the PM peak hour. This equates to approximately four-to-five vehicle movements per minute at these times, which as noted above represents a highly robust assessment. The impact at other junctions in the study area is much reduced, as vehicles would readily dissipate across the local highway network.
- 1.8.5 As part of any forthcoming planning application, a full Transport Assessment (TA) would be prepared, informed by the Medway AIMSUN Model (MAM), which would consider the highway capacity impacts of the proposed development in combination with other local committed and allocated developments on the local and strategic highway networks. Proportionate contributions to off-site highway mitigation measures identified through the Local Plan process would be made where necessary, with an emphasis on highway safety improvements and enhancements to sustainable and active travel infrastructure, in line with the principles of Department for Transport Circular 01/2022.

1.9 TRANSPORT STRATEGY

- 1.9.1 The proposed development would be subject to a Framework Travel Plan; a draft of which would accompany a forthcoming planning application. This would give consideration to the ongoing changes in travel behaviours which were hastened by the Covid-19 pandemic, as well as potential 'soft' and 'hard' interventions to lock-in this shift away from peak period vehicle use, in accordance with the

overarching sustainability objective of the emerging Local Plan. These could include financial incentives to encourage the uptake of walking, cycling, public transport and car clubs, as well as home shopping services, and the implementation of facilities to promote home-based and flexible working patterns. As has been noted, there is also the potential to route a new or enhanced bus service through the site between Gravesend Road and Brompton Farm Road.

- 1.9.2 The implementation of cycle to work schemes by both employers and local authorities has achieved an increase in the number of people who are opting to cycle either their full commute or part of it. This will be facilitated by the provision of secure cycle storage facilities for every dwelling and enhanced cycle infrastructure both within the site and externally, in support of the emerging Medway LCWIP. The potential on-site primary school will also benefit from the implementation of 'school streets' in the vicinity, to ensure that pupils and parents have the opportunity to walk and cycle in safety on a daily basis.
- 1.9.3 The design of the internal site layout is also critical to the uptake of active and sustainable travel modes and to trip internalisation. To this end, the street network will prioritise non-car modes at every opportunity, with wide, direct, landscaped and well-surveilled walking and cycling routes provided along principal route corridors and shared surfaces and 'home zones' within lightly trafficked areas. The existing PROW that cross the site will also be maintained and enhanced to promote walking for leisure.
- 1.9.4 Where the use of a car remains necessary, the increased uptake of electric and low-emission vehicles will progressively reduce their environmental impact, and these will be promoted through the installation of 'active' charging infrastructure for every dwelling. The potential to introduce an on-site car club will also be explored to seek to reduce car ownership and parking demand.

1.10 SUMMARY AND CONCLUSION

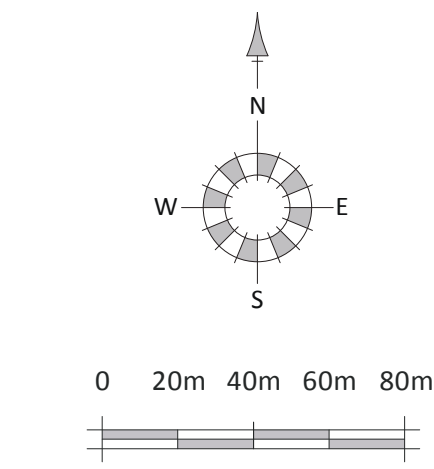
- 1.10.1 This Transport Technical Note has been prepared in support of representations by Bellway Homes (Strategic) Ltd. to the Medway Local Plan 2040 Regulation 18 consultation in relation to Land North of Brompton Farm Road, in Strood, which is being promoted for residential development.
- 1.10.2 The proposals comprise the development of c. 800 residential dwellings, a school and a neighbourhood centre consisting of small retail units and a medical hub, together with associated access, landscaping and open space.
- 1.10.3 Primary vehicular access to the site would be achieved via a signalised junction on the A226 Gravesend Road, with a secondary pedestrian, cycle, emergency and potential bus-only access proposed from Strodes Close. A total of six pedestrian accesses are proposed; four of which are associated with existing Public Rights of Way that would be retained as part of the development.
- 1.10.4 A review of the existing local pedestrian, cycle and public transport infrastructure has demonstrated that the site is afforded the opportunity for many everyday

















journeys to take place by active and sustainable travel modes, with a range of local services and facilities located within a reasonable walking and cycling distance. Enhancements to this infrastructure would be made as part of the proposed development, in support of the emerging Medway Local Cycling and Walking Infrastructure Plan, and the potential on-site primary school and neighbourhood centre would further enhance non-car accessibility.

- 1.10.5 An initial trip generation assessment has been completed for the proposals, which indicates that up to 413 vehicle movements could be generated in the weekday AM peak hour and 406 in the PM peak hour. Across the twelve-hour working day (07:00-19:00), approximately 297 vehicle movements per hour are forecast.
- 1.10.6 These vehicle trips have been distributed and assigned to the local highway network using 2011 Census data, which demonstrates that they would readily dissipate away from the site. As part of any forthcoming planning application, a full Transport Assessment would be prepared, which would consider the highway capacity impacts of the proposed development in combination with other local committed and allocated developments on the local and strategic highway networks. Proportionate contributions to off-site highway mitigation measures identified through the Local Plan process would be made where necessary, with an emphasis on highway safety improvements and enhancements to sustainable and active travel infrastructure.
- 1.10.7 In summary, it has been demonstrated that the site represents a viable and sustainable location for development in transport planning terms.

APPENDIX A





- KEY**
-  Vehicular and pedestrian access
 -  Pedestrian access only
 -  Existing Public Right of Way
 -  Trim Trail
 -  Residential development parcels
 -  Footpath/cycle links
 -  Play areas
 -  Wildflower meadows
 -  Mown paths
 -  Viewing area
 -  Community orchard
 -  Community allotments
 -  SUDS features
 -  Neighbourhood centre
 -  School site
 -  School playing fields

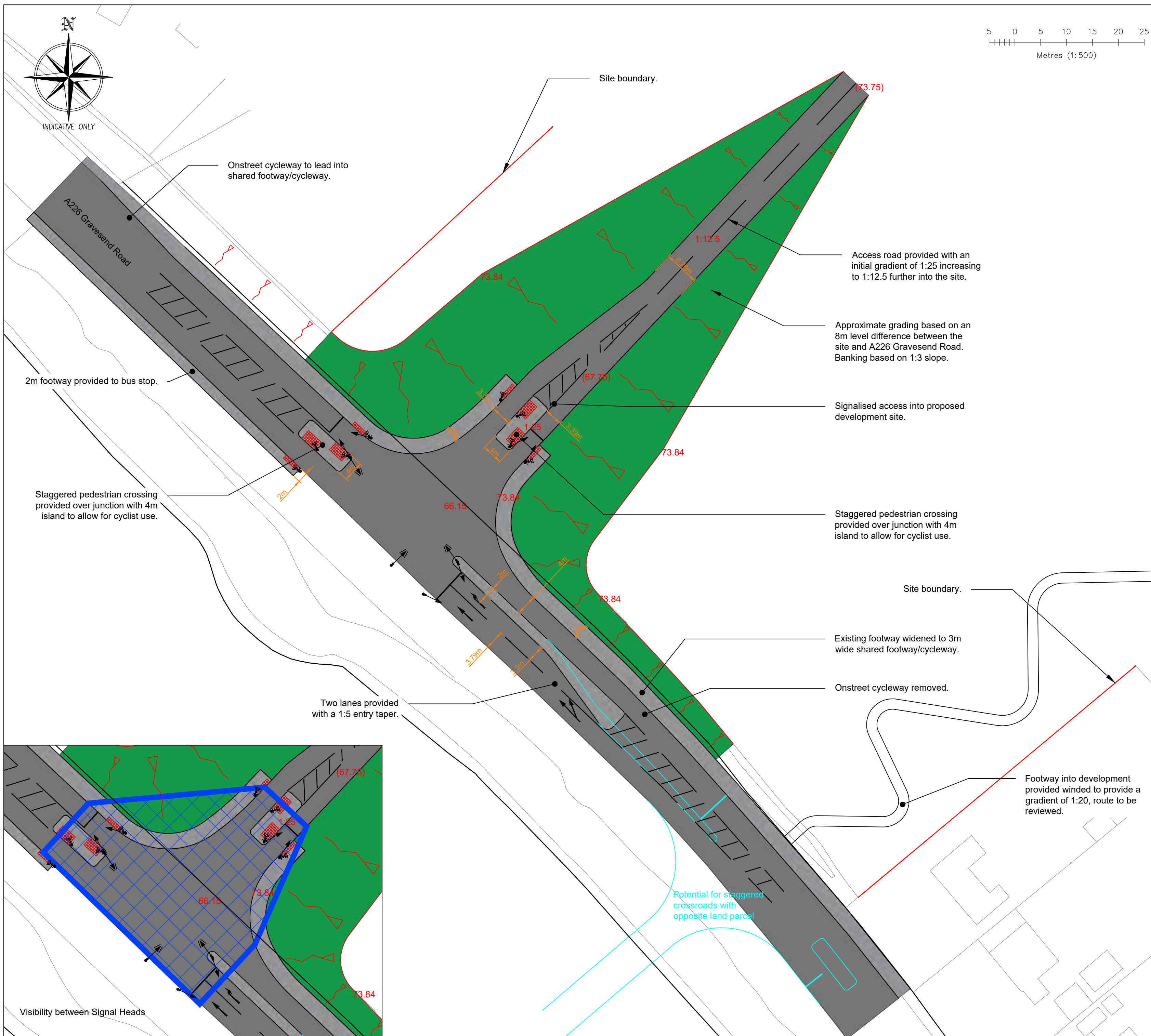


Illustrative Masterplan
Broomhill Rise, Strood
23020 / SK01C

Scale 1:2000 @ A1 October 2023

APPENDIX B





Notes:

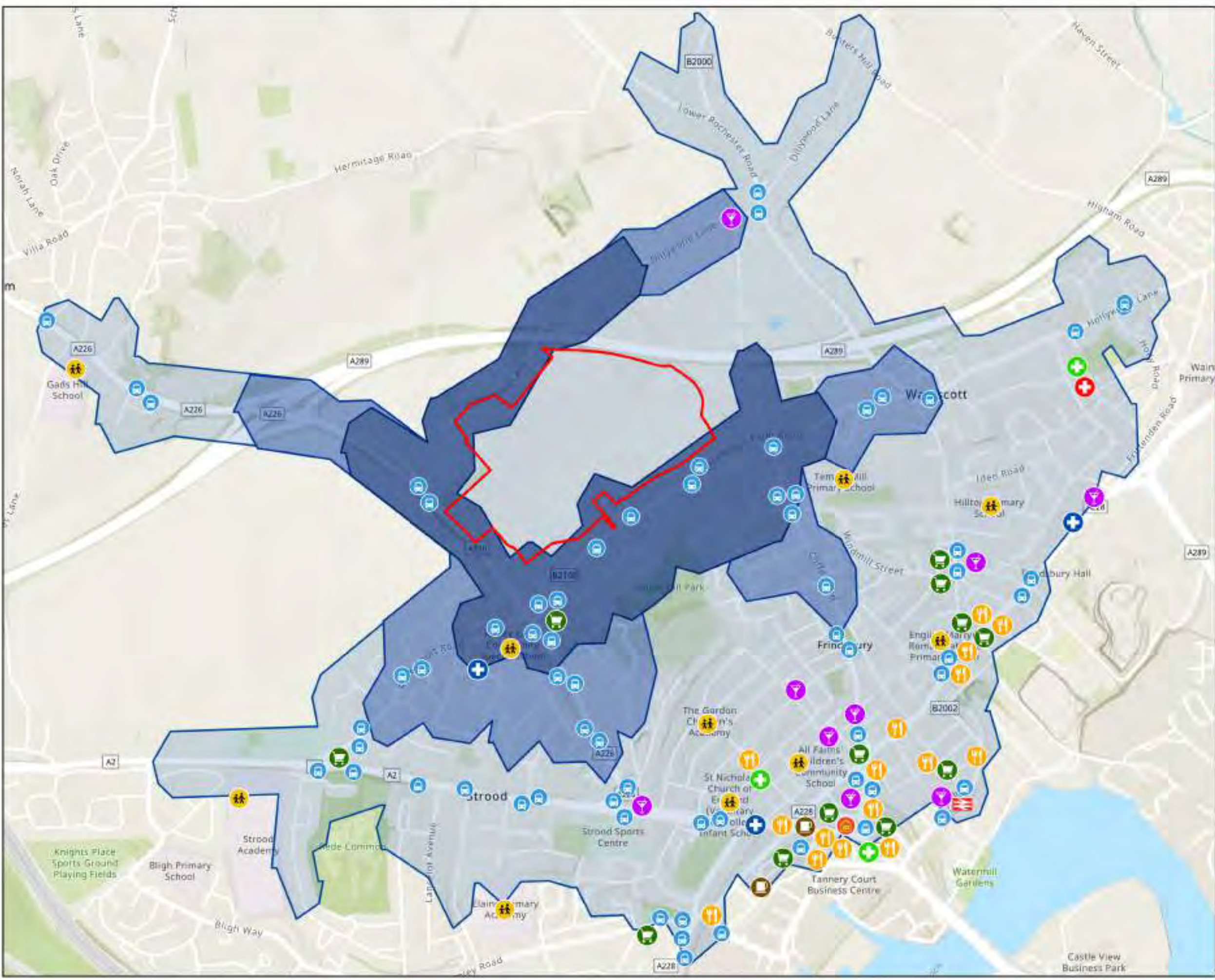
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- Drawing is based on OS data. Highway definition data provided by Medway Council.
- Drawing is subject to topographical survey and a stage 1 road safety audit.
- Levels shown are indicative based on lidar data

Extent of Highway Maintained Land

P1	First issue	24.10.23	CS
REV	AMENDMENTS	DATE	CHK
Client			
BELLWAY HOMES LTD (KENT DIVISION)			
Project			
LAND NORTH OF BROMPTON FARM ROAD, STROOD			
Title			
PROPOSED ACCESS ARRANGEMENT			
Dwg	Rev	Scale	Date
32314-H-01	P1	1:500	24.10.23
			
Eclipse House, Eclipse Park. Sittingbourne Road Maidstone, Kent. ME14 3EN			
t: 01622 776226		f: 01622 776227	
e: info@dhaplanning.co.uk		w: www.dhaplanning.co.uk	
CAD Reference:			A2

APPENDIX C





- ### Key
- Site Location
 - 5 Minute Walk From The Site Accesses
 - 10 Minute Walk From The Site Accesses
 - 20 Minute Walk From The Site Accesses
 - Schools
 - Dentist Surgeries
 - Pharmacies
 - GP Surgeries
 - Grocery Store
 - Cafe
 - Pubs
 - Resturant
 - Post Office
 - Train Station
 - Bus Stops

TITLE

Facilities within walking distance of the site

CLIENT
Bellway Homes

PROJECT
Brompton Farm Road, Strood

SCALE A4 A3	DATE	JOB NO	DRWG NO
1:12,500	Oct 2023	32314	G-01

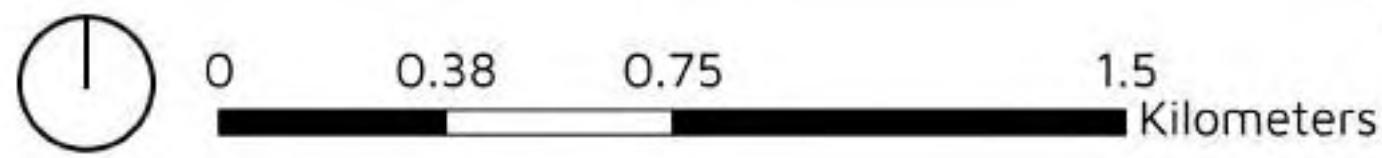


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e: info@dhaplanning.co.uk
w: www.dhaplanning.co.uk

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World Hillshade: Esri, Intermap, NASA, NGA, USGS. Contains public sector information licensed under the Open Government Licence v3.0.

APPENDIX D



Calculation Reference: AUDIT-704001-231002-1009

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED
TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	ES	EAST SUSSEX 2 days
	HC	HAMPSHIRE 2 days
	HF	HERTFORDSHIRE 1 days
	KC	KENT 3 days
	SC	SURREY 2 days
	WB	WEST BERKSHIRE 1 days
	WS	WEST SUSSEX 3 days
04	EAST ANGLIA	
	CA	CAMBRIDGESHIRE 1 days
	NF	NORFOLK 10 days
05	EAST MIDLANDS	
	DY	DERBY 1 days
06	WEST MIDLANDS	
	ST	STAFFORDSHIRE 1 days
11	SCOTLAND	
	AS	ABERDEENSHIRE 1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 105 to 537 (units:)
 Range Selected by User: 100 to 600 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/15 to 29/06/23

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	8 days
Wednesday	10 days
Thursday	5 days
Friday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	23 days
Directional ATC Count	5 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town	22
Neighbourhood Centre (PPS6 Local Centre)	6

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	22
Village	5
Out of Town	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included	10 days - Selected
Servicing vehicles Excluded	63 days - Selected

Secondary Filtering selection:

Use Class:

C3	28 days
----	---------

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS@.

Population within 500m Range:

All Surveys Included

Secondary Filtering selection (Cont.):

Population within 1 mile:

1,001 to 5,000	8 days
5,001 to 10,000	9 days
10,001 to 15,000	7 days
15,001 to 20,000	2 days
20,001 to 25,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	7 days
25,001 to 50,000	6 days
50,001 to 75,000	3 days
75,001 to 100,000	3 days
100,001 to 125,000	1 days
125,001 to 250,000	8 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	3 days
1.1 to 1.5	21 days
1.6 to 2.0	4 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	21 days
No	7 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	28 days
-----------------	---------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	AS-03-A-02 FARROCHIE ROAD STONEHAVEN	MIXED HOUSES	ABERDEENSHIRE
	Edge of Town Residential Zone Total No of Dwellings:	131	
	Survey date: WEDNESDAY	20/04/22	Survey Type: MANUAL
2	CA-03-A-06 CRAFT'S WAY NEAR CAMBRIDGE BAR HILL Neighbourhood Centre (PPS6 Local Centre) Village	MIXED HOUSES	CAMBRIDGESHIRE
	Total No of Dwellings:	207	
	Survey date: FRIDAY	22/06/18	Survey Type: MANUAL
3	DY-03-A-01 RADBOURNE LANE DERBY	MIXED HOUSES	DERBY
	Edge of Town Residential Zone Total No of Dwellings:	371	
	Survey date: TUESDAY	10/07/18	Survey Type: MANUAL
4	ES-03-A-03 SHEPHAM LANE POLEGATE	MIXED HOUSES & FLATS	EAST SUSSEX
	Edge of Town Residential Zone Total No of Dwellings:	212	
	Survey date: MONDAY	11/07/16	Survey Type: MANUAL
5	ES-03-A-08 WRESTWOOD ROAD BEXHILL	MIXED HOUSES & FLATS	EAST SUSSEX
	Edge of Town Residential Zone Total No of Dwellings:	110	
	Survey date: WEDNESDAY	12/10/22	Survey Type: MANUAL
6	HC-03-A-29 CROW LANE RINGWOOD CROW	MIXED HOUSES & FLATS	HAMPSHIRE
	Edge of Town Residential Zone Total No of Dwellings:	195	
	Survey date: THURSDAY	30/06/22	Survey Type: MANUAL
7	HC-03-A-32 GREEN LANE FARNHAM WEYBOURNE Neighbourhood Centre (PPS6 Local Centre) Residential Zone	MIXED HOUSES & FLATS	HAMPSHIRE
	Total No of Dwellings:	105	
	Survey date: THURSDAY	29/06/23	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

8	HF-03-A-03 HARE STREET ROAD BUNTINGFORD	MIXED HOUSES	HERTFORDSHIRE
	Edge of Town Residential Zone Total No of Dwellings:	160	
	Survey date: MONDAY	08/07/19	Survey Type: MANUAL
9	KC-03-A-07 RECVLVER ROAD HERNE BAY	MIXED HOUSES	KENT
	Edge of Town Residential Zone Total No of Dwellings:	288	
	Survey date: WEDNESDAY	27/09/17	Survey Type: MANUAL
10	KC-03-A-08 MAIDSTONE ROAD CHARING	MIXED HOUSES	KENT
	Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings:	159	
	Survey date: TUESDAY	22/05/18	Survey Type: MANUAL
11	KC-03-A-10 HEADCORN ROAD STAPLEHURST	MIXED HOUSES	KENT
	Edge of Town Residential Zone Total No of Dwellings:	106	
	Survey date: TUESDAY	09/05/23	Survey Type: MANUAL
12	NF-03-A-16 NORWICH COMMON WYMONDHAM	MIXED HOUSES & FLATS	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:	138	
	Survey date: TUESDAY	20/10/15	Survey Type: DIRECTIONAL ATC COUNT
13	NF-03-A-23 SILFIELD ROAD WYMONDHAM	MIXED HOUSES & FLATS	NORFOLK
	Edge of Town Out of Town Total No of Dwellings:	514	
	Survey date: WEDNESDAY	22/09/21	Survey Type: MANUAL
14	NF-03-A-31 BRANDON ROAD SWAFFHAM	MIXED HOUSES	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:	321	
	Survey date: THURSDAY	22/09/22	Survey Type: DIRECTIONAL ATC COUNT
15	NF-03-A-32 HUNSTANTON ROAD HUNSTANTON	MIXED HOUSES & FLATS	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:	164	
	Survey date: WEDNESDAY	21/09/22	Survey Type: DIRECTIONAL ATC COUNT

LIST OF SITES relevant to selection parameters (Cont.)

16	NF-03-A-33 LONDON ROAD ATTLEBOROUGH	MIXED HOUSES	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:	143	
	Survey date: THURSDAY	29/09/22	Survey Type: MANUAL
17	NF-03-A-35 REPTON AVENUE NORWICH	MIXED HOUSES & FLATS	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:	116	
	Survey date: WEDNESDAY	28/09/22	Survey Type: MANUAL
18	NF-03-A-38 BEAUFORT WAY GREAT YARMOUTH BRADWELL	MIXED HOUSES	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:	537	
	Survey date: TUESDAY	20/09/22	Survey Type: MANUAL
19	NF-03-A-39 HEATH DRIVE HOLT	MIXED HOUSES	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:	212	
	Survey date: TUESDAY	27/09/22	Survey Type: MANUAL
20	NF-03-A-44 MILL LANE NEAR NORWICH HORSFORD Neighbourhood Centre (PPS6 Local Centre) Village	MIXED HOUSES	NORFOLK
	Total No of Dwellings:	125	
	Survey date: WEDNESDAY	21/09/22	Survey Type: DIRECTIONAL ATC COUNT
21	NF-03-A-47 BURGH ROAD AYLSHAM	MIXED HOUSES & FLATS	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings:	300	
	Survey date: WEDNESDAY	21/09/22	Survey Type: DIRECTIONAL ATC COUNT
22	SC-03-A-05 REIGATE ROAD HORLEY	MIXED HOUSES	SURREY
	Edge of Town Residential Zone Total No of Dwellings:	207	
	Survey date: MONDAY	01/04/19	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

23	SC-03-A-09 AMLETS LANE CRANLEIGH	MIXED HOUSES & FLATS	SURREY
	Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 136 Survey date: <i>TUESDAY</i> 24/05/22 Survey Type: <i>MANUAL</i>		
24	ST-03-A-07 BEACONSIDE STAFFORD MARSTON GATE Edge of Town Residential Zone	DETACHED & SEMI-DETACHED	STAFFORDSHIRE
	Total No of Dwellings: 248 Survey date: <i>WEDNESDAY</i> 22/11/17 Survey Type: <i>MANUAL</i>		
25	WB-03-A-03 DORKING WAY READING CALCOT Edge of Town Residential Zone	MIXED HOUSES	WEST BERKSHIRE
	Total No of Dwellings: 108 Survey date: <i>FRIDAY</i> 09/09/22 Survey Type: <i>MANUAL</i>		
26	WS-03-A-08 ROUNDSTONE LANE ANGMERING	MIXED HOUSES	WEST SUSSEX
	Edge of Town Residential Zone Total No of Dwellings: 180 Survey date: <i>THURSDAY</i> 19/04/18 Survey Type: <i>MANUAL</i>		
27	WS-03-A-14 TODDINGTON LANE LITTLEHAMPTON WICK Edge of Town Residential Zone	MIXED HOUSES	WEST SUSSEX
	Total No of Dwellings: 117 Survey date: <i>WEDNESDAY</i> 20/10/21 Survey Type: <i>MANUAL</i>		
28	WS-03-A-15 HILLAND ROAD BILLINGSHURST	MIXED HOUSES	WEST SUSSEX
	Neighbourhood Centre (PPS6 Local Centre) Village Total No of Dwellings: 380 Survey date: <i>TUESDAY</i> 23/11/21 Survey Type: <i>MANUAL</i>		

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
HC-03-A-26	COVID
SF-03-A-10	COVID
WS-03-A-12	COVID
WS-03-A-13	COVID

MANUALLY DESELECTED SURVEYS

Site Ref	Survey Date	Reason for Deselection
DH-03-A-02	27/03/17	n/a
HC-03-A-28	08/11/21	n/a
KC-03-A-04	22/09/17	n/a
WS-03-A-18	15/05/23	n/a

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
TOTAL VEHICLES
Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	28	214	0.076	28	214	0.302	28	214	0.378
08:00 - 09:00	28	214	0.145	28	214	0.371	28	214	0.516
09:00 - 10:00	28	214	0.133	28	214	0.163	28	214	0.296
10:00 - 11:00	28	214	0.127	28	214	0.142	28	214	0.269
11:00 - 12:00	28	214	0.136	28	214	0.141	28	214	0.277
12:00 - 13:00	28	214	0.153	28	214	0.142	28	214	0.295
13:00 - 14:00	28	214	0.147	28	214	0.142	28	214	0.289
14:00 - 15:00	28	214	0.158	28	214	0.179	28	214	0.337
15:00 - 16:00	28	214	0.255	28	214	0.164	28	214	0.419
16:00 - 17:00	28	214	0.266	28	214	0.161	28	214	0.427
17:00 - 18:00	28	214	0.341	28	214	0.166	28	214	0.507
18:00 - 19:00	28	214	0.285	28	214	0.155	28	214	0.440
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.222			2.228			4.450

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected:
Survey date date range:
Number of weekdays (Monday-Friday):
Number of Saturdays:
Number of Sundays:
Surveys automatically removed from selection:
Surveys manually removed from selection:

105 - 537 (units:)
01/01/15 - 29/06/23
32
0
0
37
4

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

APPENDIX

3



Broomhill Rise

Social Infrastructure Audit

Final Report

September 2024



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1.0 Introduction

1.1 Overview

- 1.1.1 Social infrastructure can be defined by the facilities, spaces, services and networks that support the quality of life and wellbeing of our communities.
- 1.1.2 DHA Social infrastructure Audits evaluate the availability, accessibility, and quality of community facilities and services in a particular area and summarises how the proposal relates to and seeks to contribute to them.
- 1.1.3 This document has been prepared on behalf of Bellway Homes LTD by DHA associated with the proposed development at land at Brompton Farm.

1.2 Proposed Development

- 1.2.1 The current proposed development is for the development of approximately 800 dwellings, a school and a neighbourhood centre containing small retail units and a medical hub.



aprx. 800
new dwellings.



Proposed
Neighbourhood
centre



New school



New open
Space

2.0 Policy Review

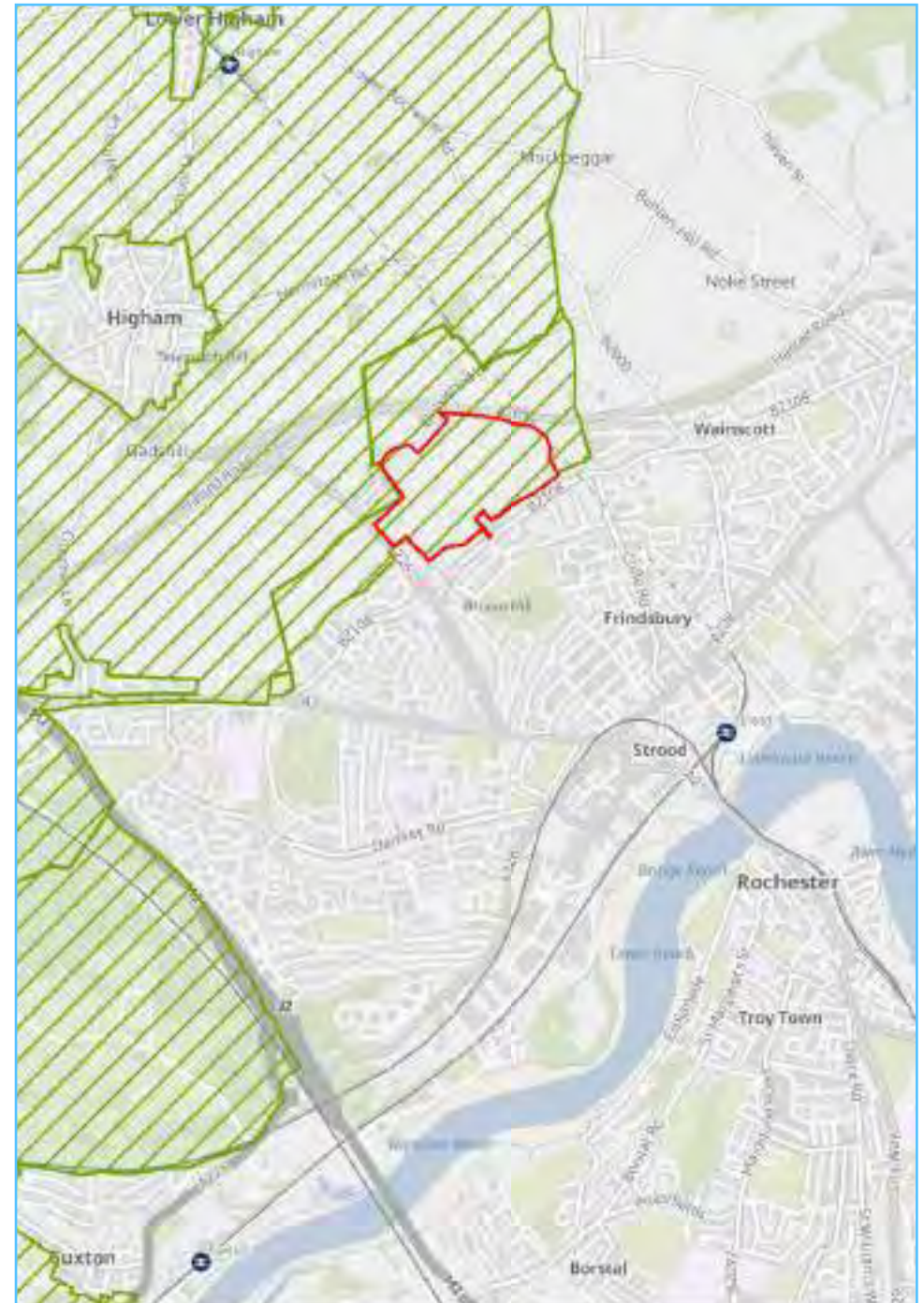
2.1 Greenbelt

2.1.1 Medway has only a small proportion of land that is considered Green Belt. Approximately only 4.98% of the Medway's land is designated as Green Belt. Despite the small amount of land, the Green Belt retains the strategic gap between the urban areas of Gravesend and Strood and prevents the coalescence of Strood and Higham, Snodland and Halling. As such, the Green Belt plays an important role in this regard.

2.2 NPPF Policy

2.2.1 The NPPF sets out that the Green Belt serves five purposes:

- (1) To check the unrestricted sprawl of large built-up areas;
- (2) To prevent neighbouring towns merging into one another;
- (3) To assist in safeguarding the countryside from encroachment;
- (4) To preserve the setting and special character of historic towns; and
- (5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.



2.2.2 Policy BNE30 states that:

Within the Metropolitan Green Belt, as defined on the proposals map, there is a general presumption against inappropriate development. Development will not be permitted unless the following objectives are fulfilled:

- (i) It is designed and sited so that the open character of the area is maintained; and
- (ii) It accords with the purposes of including land in the Green Belt
- (iii) New buildings will only be permitted for the following purposes:
 - (a) Agriculture or forestry;
 - (b) Essential small-scale facilities for outdoor sport or recreation, for cemeteries or other land uses that fulfil the above objectives; or
 - (c) A limited extension, alteration or replacement of an existing building; or
 - (d) Limited infilling within the boundary of Upper Halling
- (iv) The reuse of buildings will only be permitted if:
 - (a) The development fulfils the above objectives, taking into account any proposed extension to the buildings and any associated uses of land surrounding the buildings; and
 - (b) The buildings are of permanent and substantial construction, and are capable of conversion without major or complete

reconstruction; and

- (c) The form, mass and general design of the buildings are in keeping with their surroundings.

2.2.3 Policy S7 of the emerging Local Plan (Regulation 18) states that

The Council recognises the important function of Green Belt at a local and strategic scale, in managing the urban sprawl and coalescence of settlements and maintaining the openness and permanence of the countryside.

2.2.4 Development proposals will be permitted only where they are in accordance with national planning policy for the Green Belt and can demonstrate that it would not undermine the functioning of the Green Belt.

2.2.5 The Council will seek opportunities to enhance land for beneficial uses in the Green Belt to strengthen its function.

2.3 Medway Green Belt Review (2018)

2.3.1 The Medway Green Belt Review divides the Green Belt into five different parcels. The site forms the larger northeastern area of Parcel 2. Parcel 2 is described as the following:

"The parcel is situated to the south of the A289. The southern edges of this parcel are bordered by the urban fringes of Strood which form Medway's Green Belt boundary within this area. This parcel should be viewed integrally with Parcel 1. It forms part of a larger tract of Green Belt land which

extends beyond the district boundary into Gravesham (to the north and west). The Green Belt washes over the A289 and A226. Land uses consist of a mixture of arable, horticulture and orchards. The orchard and horticultural uses are focused to the north with arable farmland to the south and west. The land falls away gently to the north west. The landscape character changes according to land uses. The area of polytunnels to the south of Dillywood Lane is more enclosed; the arable farmland and orchard areas more open. The arable farmland to the south west (separated by the A226 and a steep embankment) is distinctly part of the wider green belt farmland extending towards the A289 and beyond. The southern corner of this parcel has recreational sports uses and includes the Rochester City Football Ground. Urbanising influence of A289 to north mitigated by cutting and planted edge.”

- 2.3.2 The Council concludes that Parcel 2 provides a high contribution to the purpose and aims of the Green Belt.
- 2.3.3 There have also several planning applications related to the site. These applications proposed large scale residential developments of up to 135no. residential dwellings (MC/16/2917) and up to 122no. dwellings (MC/17/2956) which were subsequently both refused due to inappropriate development within the Green Belt and the loss of high-quality agricultural land.

2.4 Green Belt Review (September 2024)

- 2.4.1 A Green Belt Review was undertaken by Scarp Landscape Architecture to inform the contribute and importance of Green Belt Parcel 2.
- 2.4.2 The Scarp Green Belt Review describes that the proposals would implement a Green Infrastructure corridor on the north-western part of the site. This corridor provides mitigation to the resulting harm of preventing to the resulting harm of preventing urban sprawl into the countryside, by delivering enhanced biodiversity, habitat, screening of the proposed development and publicly accessible recreational open space.
- 2.4.3 The Scarp Green Belt Review notes that whilst the Medway Council Green Belt Review concludes that Parcel 2 provides an overall high contribution to the purpose and aims of the Green Belt, no justification was provided for this assessment.
- 2.4.4 The Scarp Green Belt Review concludes that, based on the five purposes of the Green Belt, the site's release would result in only a limited level of harm based on its limited contribution to Green Belt purposes, and minimal effects on the adjacent Green Belt land north of Dillywood Lane and the A289.
- 2.4.5 Regarding the development proposal, the proposed housing would result in inly limited harm to the Green Belt and would avoid the development of Green Belt land in more sensitive areas, such as those within the nationally designated Kent Downs Area of Outstanding Natural Beauty.

3.0 The Site

3.1 Study Area

3.1.1 The site straddles three parishes; Higham CP, Finsbury Extra CP and Medway.





3.1.2 The survey area extends to a 10 minute drive time from the site boundary in all directions covering a large proportion of Medway.

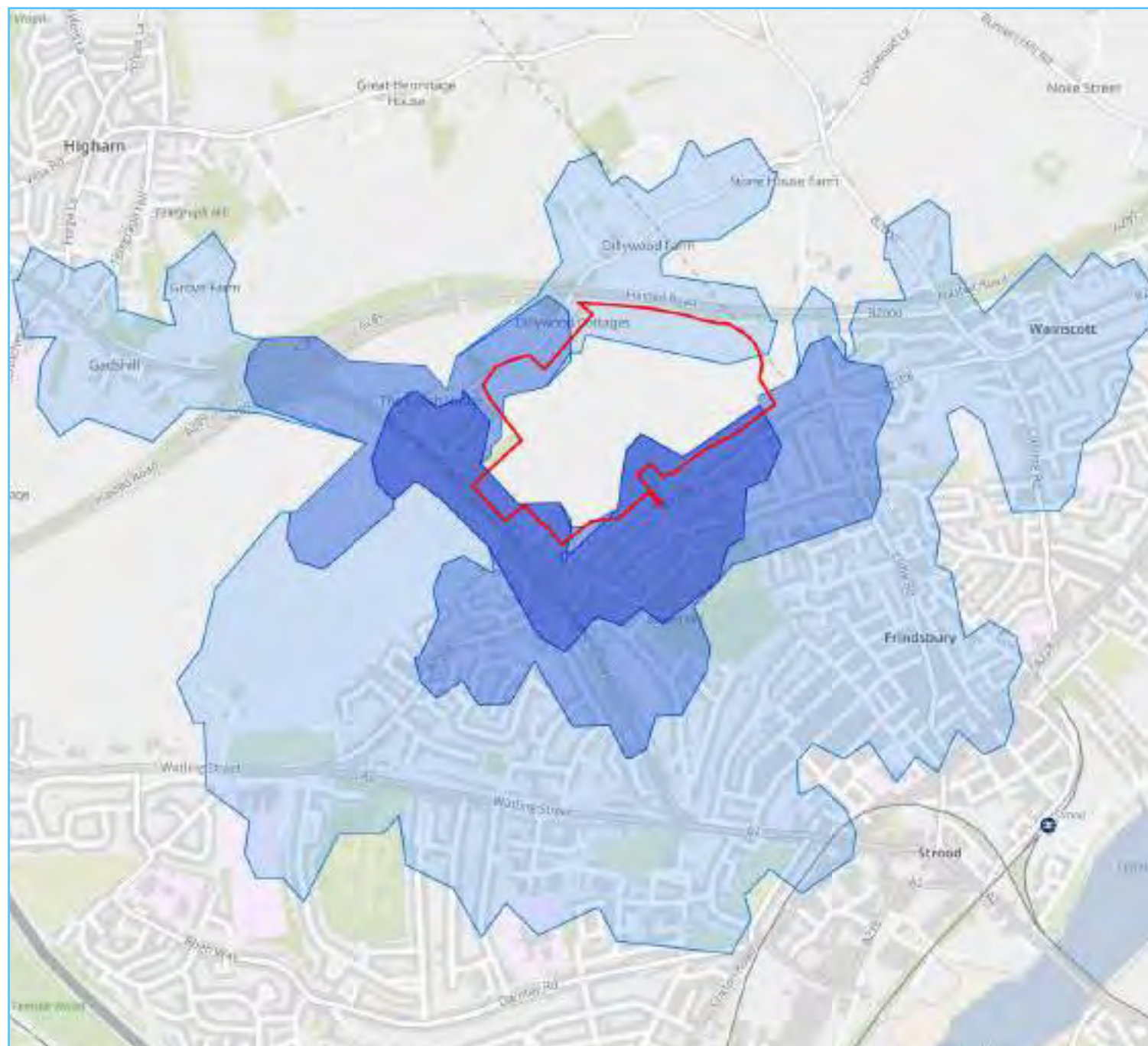


3.2 Walking Distance

- 3.2.1 An acceptable walk distance is considered to be 1.6km (approximately 20 minute walk).
- 3.2.2 For this site it is enough to cover most of Strood, half of Wainscott and south of Higham.
- 3.2.3 Key infrastructure should be accessible within a 20 minute walk distance.

Key





-  Site Boundary
-  5 Minute Walk Distance (400m) From The Site Access
-  10 Minute Walk Distance (800m) From The Site Access
-  20 Minute Walk Distance (1600m) From The Site Access

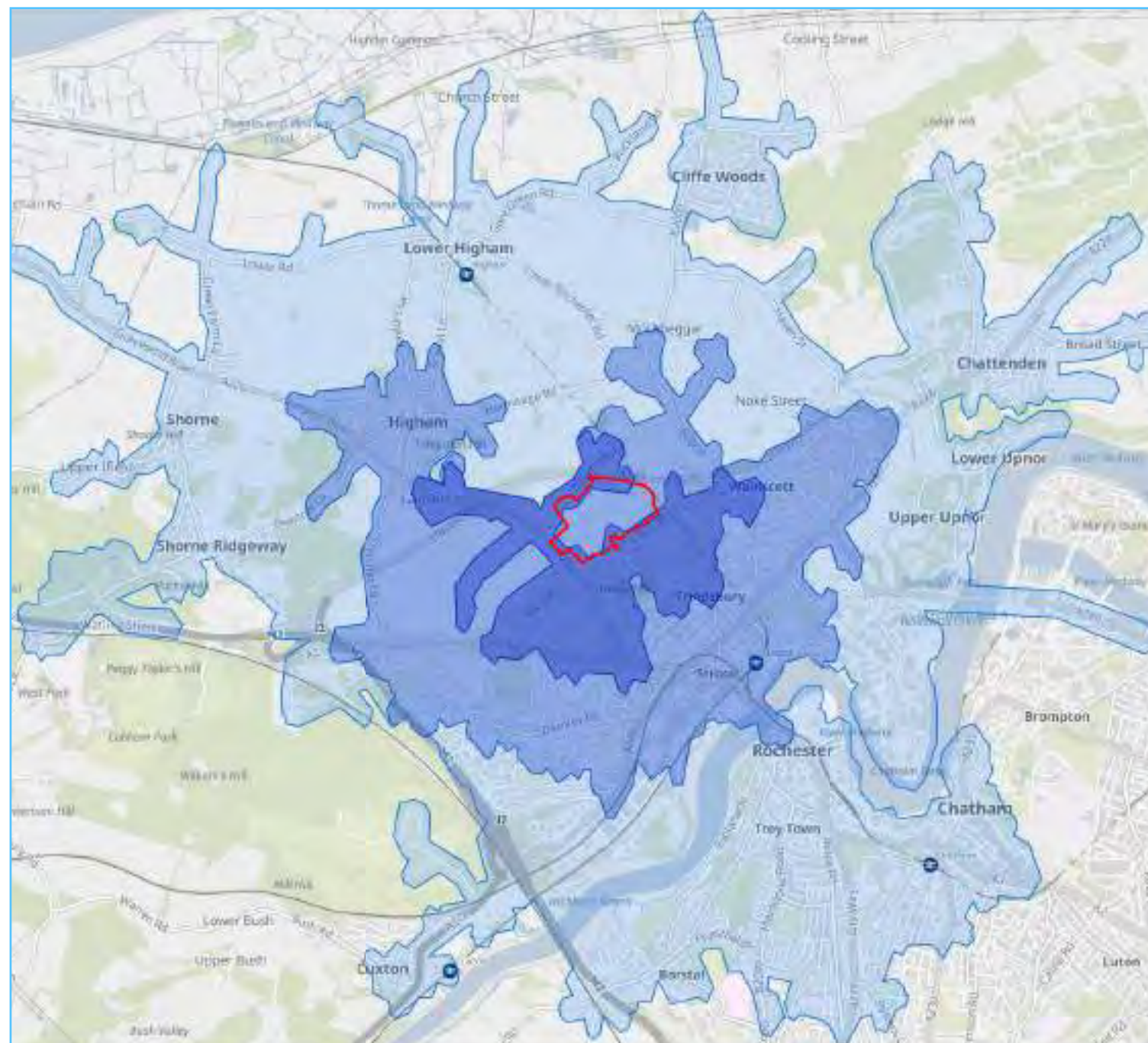


3.3 Cycling Distance

- 3.3.1 An acceptable cycling time is considered to be 20 minute cycle (approximately 5.3km cycle) to key infrastructure.
- 3.3.2 The entirety of Higham and the majority of Strood can be achieved within a 10 minute (2.7km) cycle whilst a 20 minute cycle will reach Rochester, Chatham, Chattenden, Cliff Woods and Lower Higham.

Key

-  Site Boundary
-  5 Minute Cycle Distance (1.3km) From The Site Access
-  10 Minute Cycle Distance (2.7km) From The Site Access
-  20 Minute Cycle Distance (5.3km) From The Site Access



3.4 Connectivity

3.4.1 Buses

A pair of bus stops are located on Gravesend Road, approximately 130m (or a 1 to 2 minute walk) from the proposed principal vehicular access, it is noted that this bus stop is serviced by the 190 which provided connection to Strood Town Centre and further into Chatham. A further pair of bus stops are present on Brompton Farm Road approximately 42m (or a 1 minute walk) from the proposed secondary access. The bus routes and frequencies are shown in Tables 1 and 2.

3.4.2 Train

The nearest railway station to the site is Strood, which is located approximately 2.0km (representing a 26 minute walk or a 9 minute cycle) from the proposed secondary site access on Strodes Close. This station is afforded disabled parking, step-free access and cycle storage in the form of covered Sheffield stands for 40 cycles. Table 3 lists the direct train services that are available from this station along with their weekday and weekend frequencies.

Service No	Route	Weekday	Saturday	Sunday
190	Gravesend - Chatham	2 – 3 per hour	2 – 3 per hour	1 per hour
668	Chalk – Grammar Schools	1.4	19	4
694	Higham – Grammar Schools	1.6	20	6

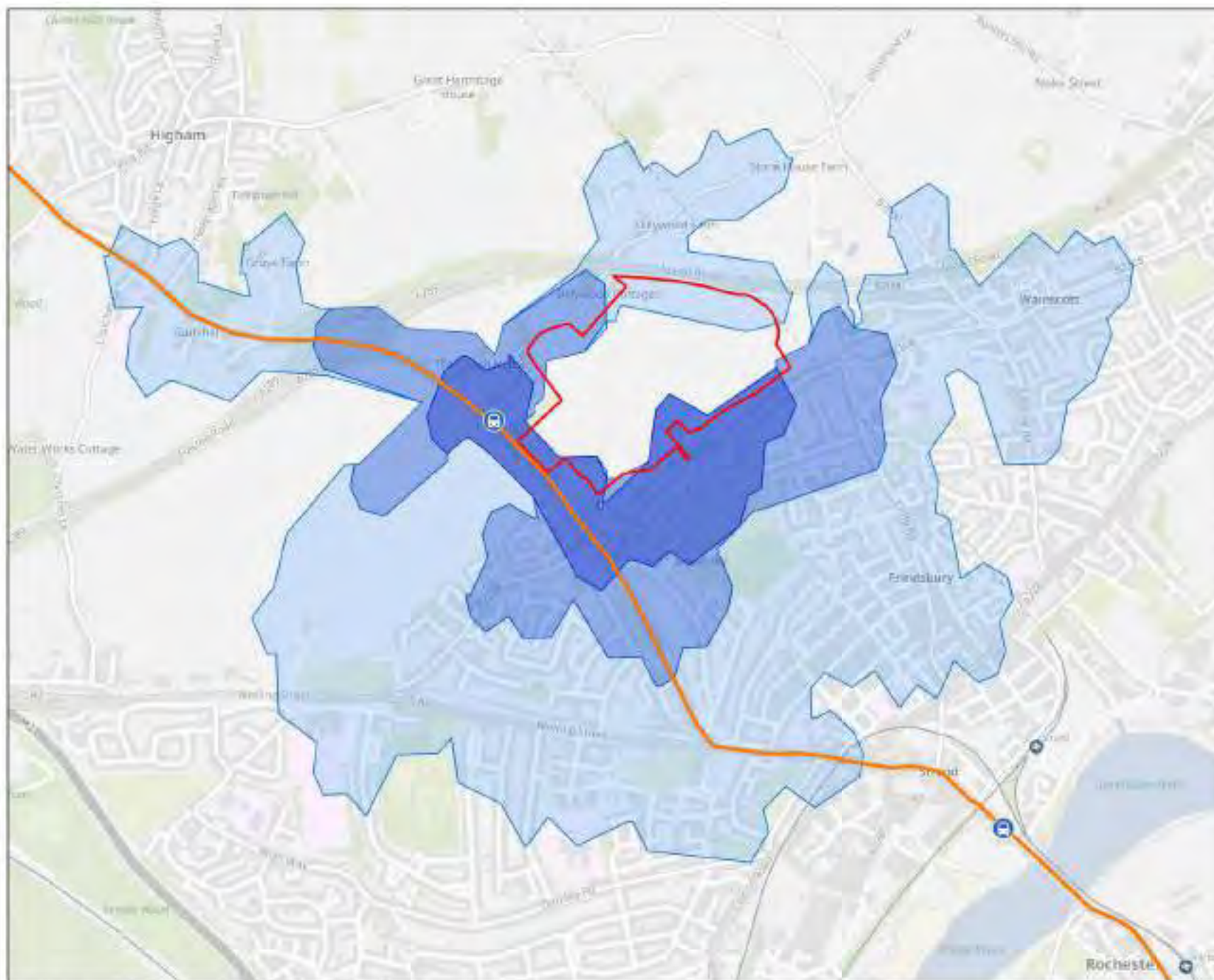
Table 1: Bus services available on Gravesend Road

Service No	Route	Weekday	Saturday	Sunday
172	Wainscott – Strood – Chatham	3 per day	No service	No service
633	Cliffe – Grammar Schools	School service	No Service	No service
673	Cuxton – Hoo Academy	School service	No service	No service
689	Darnley Arch – Hundred of Hoo Academy	School service	No service	No service
694	Higham – Grammar Schools	School service	No service	No service

Table 2: Bus services available on Brompton Farm Road

Service	Weekday	Saturdays	Sundays
Luton via London Blackfriars	2 per hour	2 per hour	No direct service
Ramsgate	1 per hour	1 per hour	1 per hour
Rainham	4 per hour	3 per hour	3 per hour
Paddock Wood	2 per hour	2 per hour	1 per hour
London St Pancras International	4 per hour	3 per hour	3 per hour

Table 3: Bus services available on Brompton Farm Road



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Bus Stop
- 180 Bus Route

4.0 Social Infrastructure

4.1 Education

Supply

4.1.1 As of 2018, Medway had 112 schools with 18 of the state funded schools being of faith. A breakdown of the varying types of schools are set out in Table 4.

Primary Schools

4.1.2 A total of 4no. primary schools are located within a 20 minute walk distance from the site access.

4.1.3 The closest primary school is Temple Mill Primary School located approximately 970m (12 minute walk) east of the site. The school has a total capacity of 210 students with a current enrolment of 242 students.

4.1.4 The second closest primary school is St Nicholas CoE Infant School which is located approximately 1.4km (19 minute walk) from the south of the site. This school has a capacity of 120 students with a current enrolment of 120 students.

4.1.5 The third closest primary school is Gordon Children's Academy

located approximately 1.6km (20 minute walk) away from the east side of the site. The school has a capacity of 400 students with an current enrolment of 320 students.

No.	Type	Number
1	Infant	15
2	Junior	11
3	Primary	52
4	All-Through	1
5	Secondary Selective	6
6	Secondary Non-Selective	10
7	University Technical College	1
8	Special Primary	1
9	Special Secondary	3
10	Special All-Through	1
11	Pupil Referral Unit	2
12	Independent	6
13	Independent Special	3
14	Total	112

Table 4: Breakdown of schools in Medway

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2023/2024
1	Temple Mill Primary School	0.97	12	4	3	242
2	St Nicholas CoE Infant School	1.4	19	4	4	120
3	Gordon Children's Academy	1.6	20	6	5	320
4	Hilltop Primary School	1.6	20	7	4	460

Table 5: Primary Schools in proximity

Post Primary Schools

4.1.6 There are 6no. secondary and higher schools located within the search area.

4.1.7 The closest school is Strood Academy which is located approximately 1.6km to the south west of the site. The school has a capacity of 1500 pupils and has a current enrolment of 1302 pupils.

4.1.8 The second closest is Rochester Independent College which is located approximately 3.5km from the south corner of the site. This school has a capacity of 209 pupils and a current enrolment of 205 pupils.

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2024/2025
1	Strood Academy	1.6	20	5	4	1302
2	Rochester Independent College	3.5	47	10	11	205
3	Fort Pitt Grammar School	4.3	61	16	13	932
4	St John Fisher Catholic Comprehensive School	4.3	61	16	13	1094
5	The Rochester Grammar School	5.1	73	21	14	1177
6	University Of Kent Rochester	7.7	105	26	12	unknown

Table 6: Post Primary Schools in proximity

SEN Schools

4.1.9 There are two of Special Educational Needs (SEN) schools.

4.1.10 The closest SEN school is Abbey Court Foundation Special Educational Needs School which is located approximately 0.5km to the south west of the site. The school has a capacity of 205 pupils and a current enrolment of 218 pupils.

4.1.11 The second closest is Abbey Court Community Special School. This SEN school is located approximately 0.8km to the south east of the site.

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2024/2025
1	Abbey Court SEN School	0.5	6	2	1	218
2	Abbey Court Community Special School	0.8	11	3	2	Unknown

Table 7: SEN Schools in proximity

Mixed Schools

4.1.12 The only mixed school is Gad’s Hill School which is located approximately 1.4km to the northwest of the site. The school has a capacity of 755 pupils and a current enrolment of 386 pupils.

School Demand

- 4.1.13 According to the School Place Planning Strategy 2018-22, the population of primary age children in Medway from 20,708 in Spring 2009 to 23,966 in Spring 2017, demonstrating considerable growth.
- 4.1.14 Additionally, the secondary age population is forecasted to increase from 18,774 in 2018 to 21,635 by Spring 2024 and there is a large increase forecasted for 2027.
- 4.1.15 According to the Department for Education (DfE) in England the average number of students per household in new homes is 0.25 primary and 0.13 secondary school places. With this in mind, a development of c.800 dwellings would expect an increase of 200 primary and 104 secondary school pupils.
- 4.1.16 Strood Academy, the secondary school located nearest to the site, has a spare capacity of 198 pupils, meaning that the anticipated 104 additional secondary pupils could be accommodated into Strood Academy, and thus, rendering provision of a new secondary school unviable.

1. Pupil Numbers www.get-information-schools.service.gov.uk/Establishments

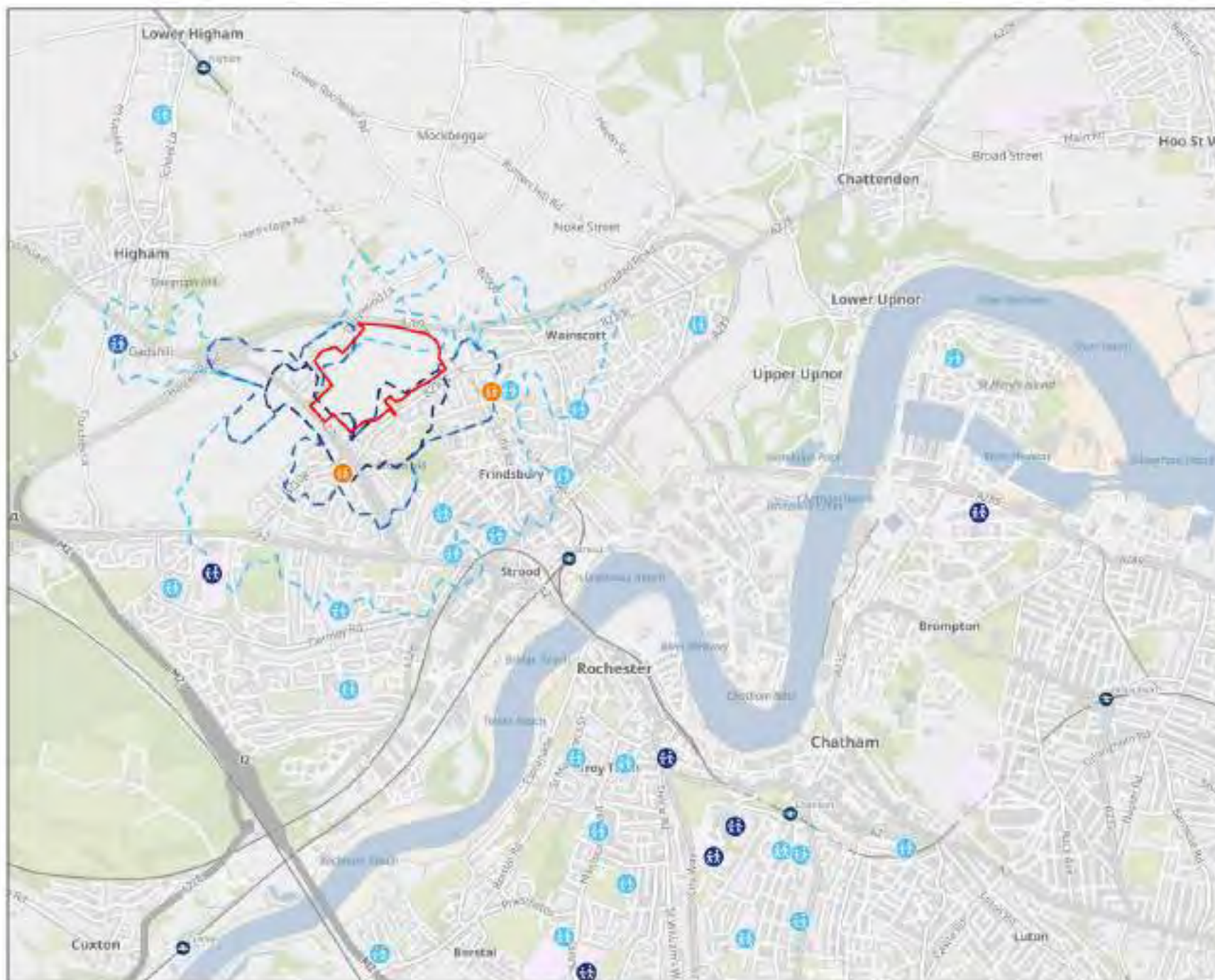
4.1.17 Simultaneously, the closest three primary schools to the site do not have the capacity to accommodate the anticipated 200 additional primary school pupils. As such, there is a need for a new primary school.

CONCLUSIONS

- 4.1.18 It is said that approximately 775no. 2-bedroom dwellings will be expected to provide a new school, rather than developer contributions.
- 4.1.19 Depending on the size of the development (thought to be c. 800 dwellings), it is highly likely that a new school will be required.
- 4.1.20 Depending on updated housing targets, a new school may also be justifiable if targets are increased, and more houses are delivered.
- 4.1.21 The site expects an increase of 200 primary school pupils meaning the provision of a new primary school is recommended.

No.	School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)	No. of Students 2024/2025
1	Gads Hill School	1.4	20	6	2	386

Table 8: Mixed Schools in proximity



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- P Post Primary
- M Mixed
- P Primary
- SEN SEN

4.0 Social Infrastructure

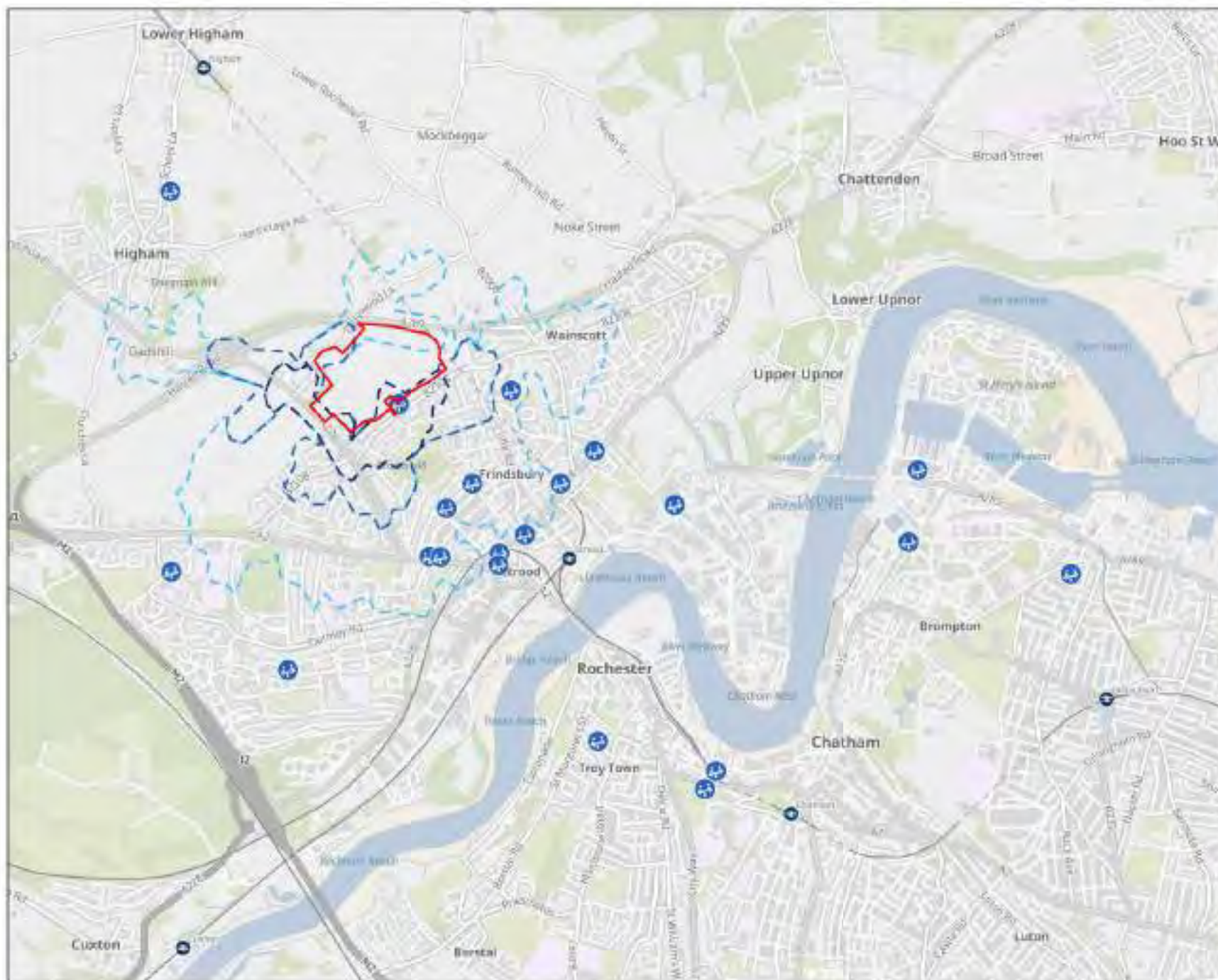
2.2 Childcare Facilities

- 2.2.1 Grace's Childcare (Childminder) is located immediately outside of the site's southern boundary.
- 2.2.2 There is pediatrician located to the east of the site (approximately 0.5km /6 min walk).
- 2.2.3 The nearest nursery to the site is Temple Mill Children's Centre, which is 1km from the site (3 minute drive/13 minute walk).
- 2.2.4 Other nearby nurseries include Witty Kiddies Strood, which is 1.18km southeast from the site (approximately 25 minute walk or 5 minute drive), and Jack & Jill Playgroup which is 1.9km southeast of the site (approximately 25 minute walk or a 6 minute drive).
- 2.2.5 There are approximately 15no. childcare facilities located within Strood.
- 2.2.6 Between the 2011 and 2021 census, the proportion of population aged 4 years and below has decreased from 6.5% to 6.2%.
- 2.2.7 However, depending on the type of dwellings (e.g. higher proportion of 3+ bedrooms), it may lead to an increase in pressure on present capacity of childcare facilities.

- 2.2.8 Knights Place Rec Play Area has been highlighted as a site that could be expanded to help address the gap in children and youth provision
- 2.2.9 None of the youth and children provision sites are of low value (i.e. below 20%)

No.	Primary School Name	Distance from site (km)	Walk Time (mins)	Cycle Time (mins)	Drive Time (mins)
1	Graces Childcare	0	1	0	0
2	Temple Mill Childrens Centre	0.8	12	4	3
3	Cherubs Montessori	1.3	16	3	3
4	Castle View Childrens Day Nursery	1.3	18	3	3
5	Witty Kiddies Strood	1.6	22	7	4
6	Gordons Childrens Academy, Infant	1.6	22	5	5

Table 9: Childcare Facilities



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- + Children's facilities

4.0 Social Infrastructure

4.3 Healthcare

Pharmacies

- 4.3.1 According to the Medway Pharmaceutical Needs Assessment (2022), there are a total of seven pharmacies in Strood, broken down into five 40-hour pharmacies (second lowest behind Medway Peninsula), one 100-hour pharmacy, and one distance selling pharmacy.
- 4.3.2 Strood has the 3rd lowest pharmacies per 100,000 population (19.5) which is higher than the Medway average (19.3) but lower than the national average (20.5).
- 4.3.3 Additionally, access to pharmacies from the site is limited, with no pharmacies located within an acceptable walking distance from the site. The pharmacy nearest to the site is the Amco Medway Pharmacy, which is an approximate 25 minute walk from the site.
- 4.3.4 The PNA recommends that a rapid review of any area where there is an application to ensure that the needs of the area have not changed in the lifetime of the PNA. This would imply that pharmacy provision is not entirely secure.
- 4.3.5 The proposed development of c.800 dwellings therefore would create significant pressure upon the existing pharmacies within

Strood and provision of a new pharmacy as part of the development should therefore be considered.

General Practice Surgeries

- 4.3.6 There are a total of 40 General Practice surgeries (GPs) in Medway.
- 4.3.7 Despite this high number, there appears to be a significant demand for more accessible GP surgeries. As part of survey to inform the Medway Joint Local Health and Wellbeing Strategy 2024-28, approximately 18% of respondents included 'better access to GP services' within their top five rankings, when asked to order what they think is the most important to improving health and wellbeing in Medway.
- 4.3.8 The perceived lack of accessible facilities is reflected within Strood. There are currently no GPs within acceptable walking distances, with the nearest GP being Court View Surgery, which is an approximate 26 minute walk south, or a 6 minute drive.
- 4.3.9 Based on the locations of other medical practices, the site would be an ideal location for a new medical practice. Additionally, the proposal for c.800 dwellings would exacerbate any local pressures on existing medical practices. However, any proposal for a GP surgery would need to be informed by a Needs Assessment.
- 4.3.10 Overall, subject to a Needs Assessment, there is potential for a new medical practice to be incorporated into the development.

The location of the would be ideal to serve the people of the proposed development and would provide a more convenient access to a medical practice to those living in the immediate vicinity of the development.

Dentistry

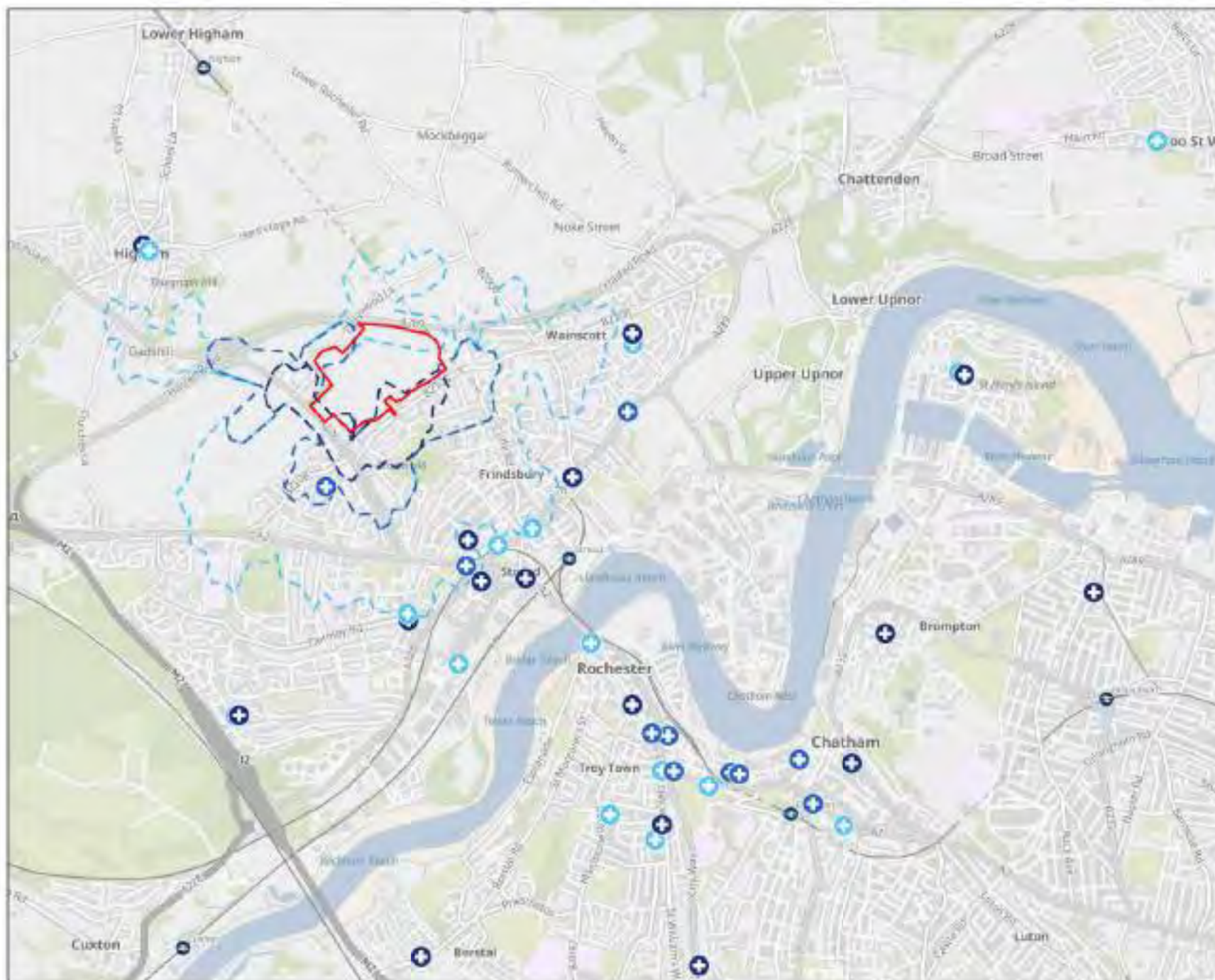
- 4.3.11 There are 5 dental clinics within Strood, with the nearest being Louise Lunness-Barnes Dental Clinic, which is an approximate 15 minute walk southwest from site. The other dental clinics are all outside of an acceptable walking distance from the site.
- 4.3.12 As part of the Medway Integrated Care Strategy, Shared Outcome 4 cites a commitment to improving access to healthcare services, including dental clinics.
- 4.3.13 The proposed c.800 dwellings would likely create additional pressure for the existing dental clinics in Strood, particularly Louise Lunness-Barnes Dental Clinic, which is located nearest to the site.
- 4.3.14 A Needs Assessment would be required to fully establish whether the proposed c.800 dwelling development would result in a need for a new dental clinic.

Summary

- 4.3.15 There are multiple accounts of evidence that access to healthcare services, such as GPs, pharmacies and dental practices, among others, requires improvement.
- 4.3.16 There is only two dentist located within an acceptable walking distance from the site, and no other healthcare facility is within an acceptable walking distance.
- 4.3.17 There is scope to incorporate a GP surgery as part of the proposed development. Whilst provision of pharmacies in Medway is overall sufficient, and a dental practice being located near the site, both of these should be considered as part of the proposed development with potential for the creation of a 'health hub'.



Louise Lunness-Barnes Dental Clinic



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- + Pharmacy
- + Dentist
- + Medical Clinic

4.0 Social Infrastructure

4.4 Sport Facilities

Grass Pitches Supply

4.4.1 Medway has a total of 165 grass pitches, with the nearest of those pitches located at Rochester United Football Club southwest of the site, which hosts U7s-U13s football teams, Medway District Youth League, and soccer schools, alongside hosting semi-professional football games of Rochester United Football Club.

4.4.2 The supply of grass pitches is shown in Table 10.

	Mini Soccer 5v5	Mini Soccer 7v7	Youth Football 9v9	Youth Football 11v11	Adult Football	Total (%) of total number of pitches)
Good	0	1	0	0	30	31 (18.8%)
Standard	15	14	13	7	60	109 (66.1%)
Poor	3	8	2	3	9	25 (15.2%)
Total (% of total number of pitches)	18 (10.9%)	23 (13.9%)	15 (9.1%)	10 (6.1%)	99 (60%)	165

Table 10: Grass Pitches. Source: 4global site assessments

Grass Pitches Demand

4.4.3 Currently, there are 388 football teams within Medway. Of these 388 teams, 51 are situated within Strood and Rural. The age categories of these teams are broken down in Table 11.

4.4.4 According to the Playing Pitch Strategy Needs Assessment, the club to team ratio in Medway (1:4.5) is higher than the national average (1:3.3) which signifies an increased demand for playing pitches in Medway compared to the national average.

Sub Area	Adult		Youth Teams				Mini Teams		Total
	Men's	Ladies	Boys		Girls		Mini Soccer		
			11v11	9v9	11v11	9v9	7v7	5v5	
Strood and Rural	15	0	9	7	0	0	10	10	51

Table 11: Team profile for football in Strood and Rural

- 4.4.5 Forecasting predicts that there will be an additional 61 football teams by 2035, including approximately 17 additional adult men's football teams and 16 additional youth boys football teams (figures rounded up). Strood and Rural is forecasted to have the third largest increase in football teams by 14 additional teams, almost a quarter of all new football teams by 2035.
- 4.4.6 Latent demand in Strood and Rural includes generation of another 6 teams, which includes two adult teams for Medway Lions, two adult teams for Riverside and two U16s teams for Woodpeckers FC.
- 4.4.7 In addition to team generation, existing playing pitches are also experiencing overplay, measured in Match Equivalent Sessions (MES), where the recorded demand for a pitch exceeds the weekly carrying capacity of that pitch.
- 4.4.8 Strood and Rural has the second highest amount of overplay on existing pitches and the second lowest available spare capacity of 11v11 adult pitches. Strood and Rural currently has the highest deficit of overplay of 24 MES with the deficit set to increase to 28 by 2035. This suggests that there is a high demand for 11v11 adult playing pitches.
- 4.4.9 11v11 youth playing pitches are also projected to have a deficit of 4.51 MES by 2035.
- 4.4.10 Pitches for other categories of football, including 9v9 youth and mini 7v7 and 5v5 pitches within Strood and Rural, are



Rochester United FC

projected to have surplus capacity by 2035.

- 4.4.11 Overall, it is thought that the development presents an opportunity to satisfy current and future demand of 11v11 adult and youth playing pitches, and to alleviate the overplaying of existing football pitches, which should be undertaken.

Artificial Grass Pitches Supply

- 4.4.12 A total of 9 artificial grass pitches (AGP) have been identified within Medway which are split by the following:
- Two 11v11 (youth and adult) pitch;
 - One 9v9 pitch;
 - Three 7v7 pitches;
 - Three 5v5 pitches.

4.4.13 The nearest AGP to the site is at Strood Academy, which is located 1.8km southwest of the site, an approximate 26 minute walk.

Artificial Grass Pitches Demand

4.4.14 The Football Association's (FA) suggested ratio of fully sized AGPs to football teams is 1:38. Given that there are only two fully sized AGPs within Medway and a total of 338 football teams in Medway, this results in a deficit of nine fully sized AGPs.

4.4.15 Despite the deficit, there is demand for only five (rounded) full sized AGPs by 2035 has been identified. Of the five pitches, demand for a single AGP (rounded from 0.48) has been identified within Strood and Rural, which is only the fourth largest demand out of the six sub-areas.

4.4.16 In addition, Strood Academy has spare capacity of 31 MES, demonstrating significant additional capacity. Securing a community use agreement for use of this pitch would satisfy the low demand within Strood and Rural without the need to build a new AGP.

4.4.17 Given the low demand of AGPs within Strood, and the high demand of grassroots pitches within Strood, incorporation of an 11v11 grassroots pitch within the proposed development

would likely be more favourable to build than an 11v11 AGP.

Rugby Union Supply

4.4.20 There are a total of 24 sites in Medway that have rugby union pitches. Four of these sites are available for community rugby usage.

4.4.21 The nearest rugby pitch provision to the development site is Lordswood Sport and Social Club, which is one of two rugby pitches in Strood and Rural, the other being Cliffe Playing Field.

4.4.22 The overall quality of rugby pitches across Medway is healthy, with 18 out of 24 rugby pitches being rated as Standard or Higher as part of the site assessments.

4.4.23 Currently, Medway as a whole has a deficit of 9 MES for training pitches, but a surplus capacity of 11 MES for match pitches. Strood's capacity is marginal, with a deficit of 1 MES for training pitches, but a surplus of 1 MES for match pitches.

Rugby Union Demand

4.4.24 A total of five rugby clubs play in Medway, amounting to a total of 40 rugby union teams. Forecasts for additional rugby teams is small, although it is predicted by 2035 that there will

be seven additional rugby union teams by 2035. There is also latent demand of six new rugby union teams of differing age categories.

4.4.25 By 2035, Medway as a whole will experience a deficit in both training (18 MES) and match (5 MES) pitches. Strood's deficit in training pitches will decrease to 3 MES but will still have a 0.5 MES surplus of match pitches. However, there are other areas in Medway, such as Rochester and Chatham, with less capacity than Strood and Rural.

Other

4.4.26 Regarding demand for other forms of playing pitches, the following conclusions can be made:

- The whole of Medway will have a surplus of artificial and grass wickets by 2035, with Strood and Rural projecting to have the second largest surplus out of the sub-areas (behind Rainham);
- Future demand for hockey teams is relatively low, and despite hockey pitches being oversubscribed on Saturdays (3.75 MES), there is plenty of spare capacity to accommodate demand on weekdays (39 MES) and Sundays (6.5 MES) by 2033;
- Three out of four bowls clubs consulted stated that they

are steadily losing members, with the RACS Bowling Club collapsing due to a lack of members;

- Approximately 79% of public tennis court capacity is utilised in Medway, compared to the national average of 53%, although this utilisation would increase to 94% by 2035 based on population increase forecasts.

Summary

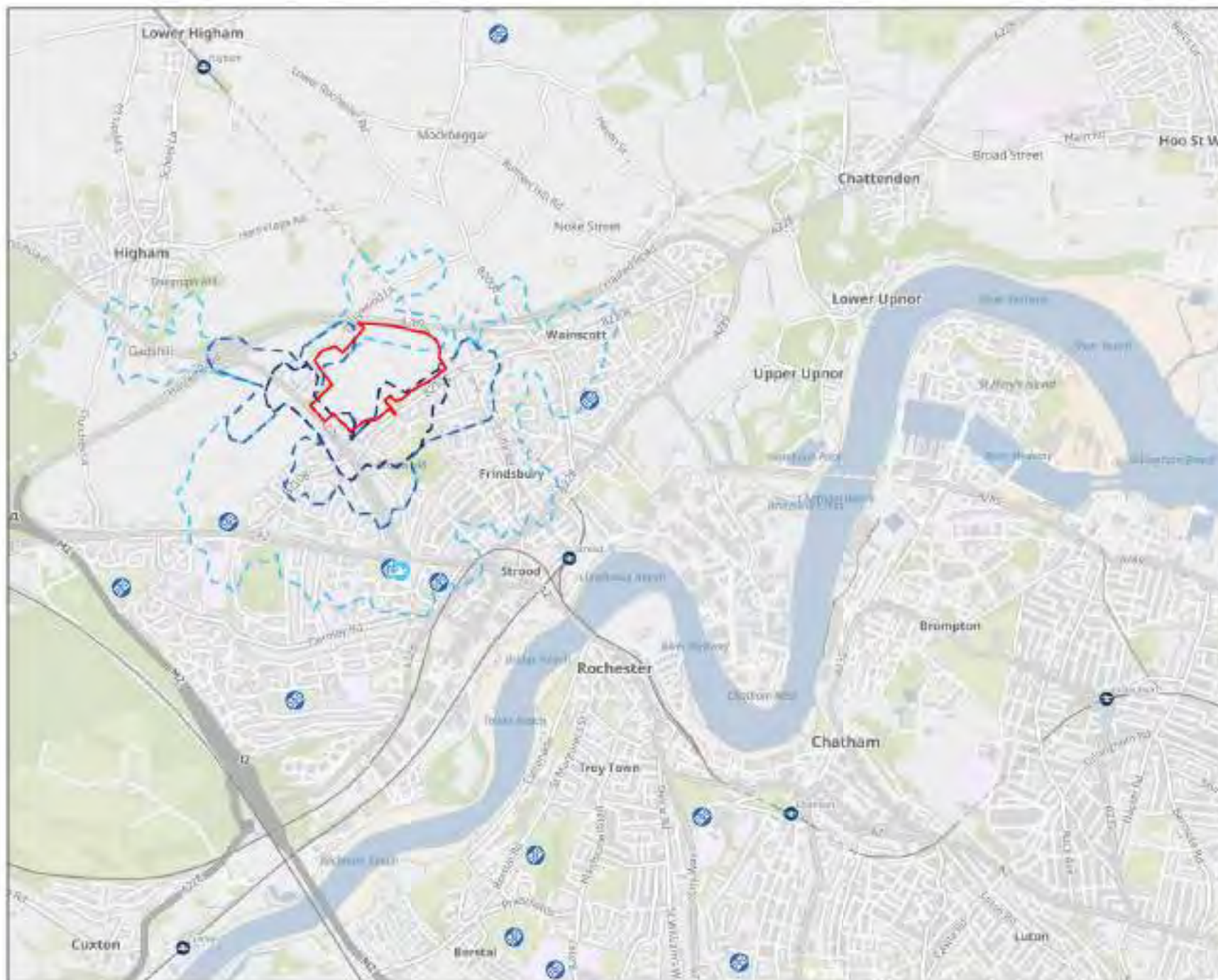
4.4.27 Overall, by far the largest demand for playing pitches comes from football clubs.

4.4.28 In particular, there is significant current demand for adult 11v11 football pitches and 11v11 youth football pitches, which is expected to increase by 2035.

4.4.29 Demand for grass pitches is higher than AGPs, although a community use agreement at Strood Academy's AGPs would provide an artificial pitch with high capacity to the community.

4.4.30 There is an overall demand for training and match rugby pitches within Medway, although this demand is lower than football pitches, and there are other sub-areas within Medway with larger demand than Strood and Rural.

4.4.31 Other sports clubs in Strood and Rural don't have a significant demand for additional capacity of playing pitches.



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- Sports
- Leisure Centre

4.5 Open Space

Local Policy & Assessment

4.5.1 Policy L4 of the Medway Local Plan states that:

"Residential development likely to be occupied by 100 people or more shall include well located local open space for formal recreation on-site at a standard equivalent to 1.7 hectares per 1,000 population and open space for children's play and casual recreation on-site at a standard equivalent to 0.7 hectares per 1,000 population. Provision of some or all of the formal open space off-site or the improvement or extension of an existing off-site facility will be permitted where the council is satisfied that this would be a better alternative;"

4.5.2 Policy of the Emerging Local Plan states that residential-led developments will be required to provide new open space and playing pitches according to the following accessibility and quantity standards shown in Table 12.

4.5.3 Alongside the Local Plan Policies, the Council's Open Space Assessment (2024) has been used to inform the provision and quality of various open spaces, in which the subsequent section discusses.

Open Space Type	Catchment	Quantity per 1,000 people
Parks and Gardens	9-minute walk time (710m)	0.80 ha
Natural and Semi-Natural Green-space	9-minute walk time (720m)	3.09 ha
Amenity Greenspace	6-minute walk time (480m)	0.80 ha
Local Area of Play (LAP)	1-minute walk time (100m)	0.25 ha
Local Equipped Area for Play (LEAP)	5-minute walk time (400m)	
Neighbourhood Equipped Area of Play (NEAP)	12.5-minute walk time (1,000m)	
Other Provision	9-minute walk time (700m)	
Allotments	No Standard Set	0.25 ha

Table 12: Accessibility and quantity standards

Parks

4.5.4 Strood has the lowest provision of public parks and gardens per 1,000 population, amounting to 0.19ha per 1,000 population as a result of 1 park (Broomhill Park) totalling 4.52ha.

4.5.5 The site is located within close proximity to Broomhill Park, although is not fully contained within the 9 minute walk target.

4.5.6 Broomhill Park scores highest out of any park in Medway on quality (78.5%).

Natural and Semi-Natural Green space

- 4.5.7 Out of 60 sites in Medway, Strood has just 1 site (Rede Common) amounting to 11.03ha which is the second lowest in Medway. Additionally, the site is not located within the 9 minute walk target.
- 4.5.8 Similarly, to Broomhill Park, Rede Common scores highly in quality (72% - 6th highest out of 60 sites).

Amenity Greenspace

- 4.5.9 Out of 165 sites, Strood has 23 amenity greenspace sites, amounting to a total of 18.85ha and an overall provision of 0.78ha per 1,000, just below the Medway average.
- 4.5.10 The vast majority of Strood is covered by the 480m catchment area (6 minute walk) for amenity green spaces, with few sparse pockets where the area isn't covered by the catchment area.
- 4.5.10 However, 20 out of the 23 amenity greenspaces within Strood were categorised as 'low quality'.

Provision for Children and Young People

- 4.5.11 Out of 163 sites in Medway, Strood has 15 sites for children and young people totalling 0.96ha, or 0.04ha per 1,000 people.
- 4.5.12 Strood has 10 LEAP and 5 casual/youth sites but has no LAP or

NEAP provision.

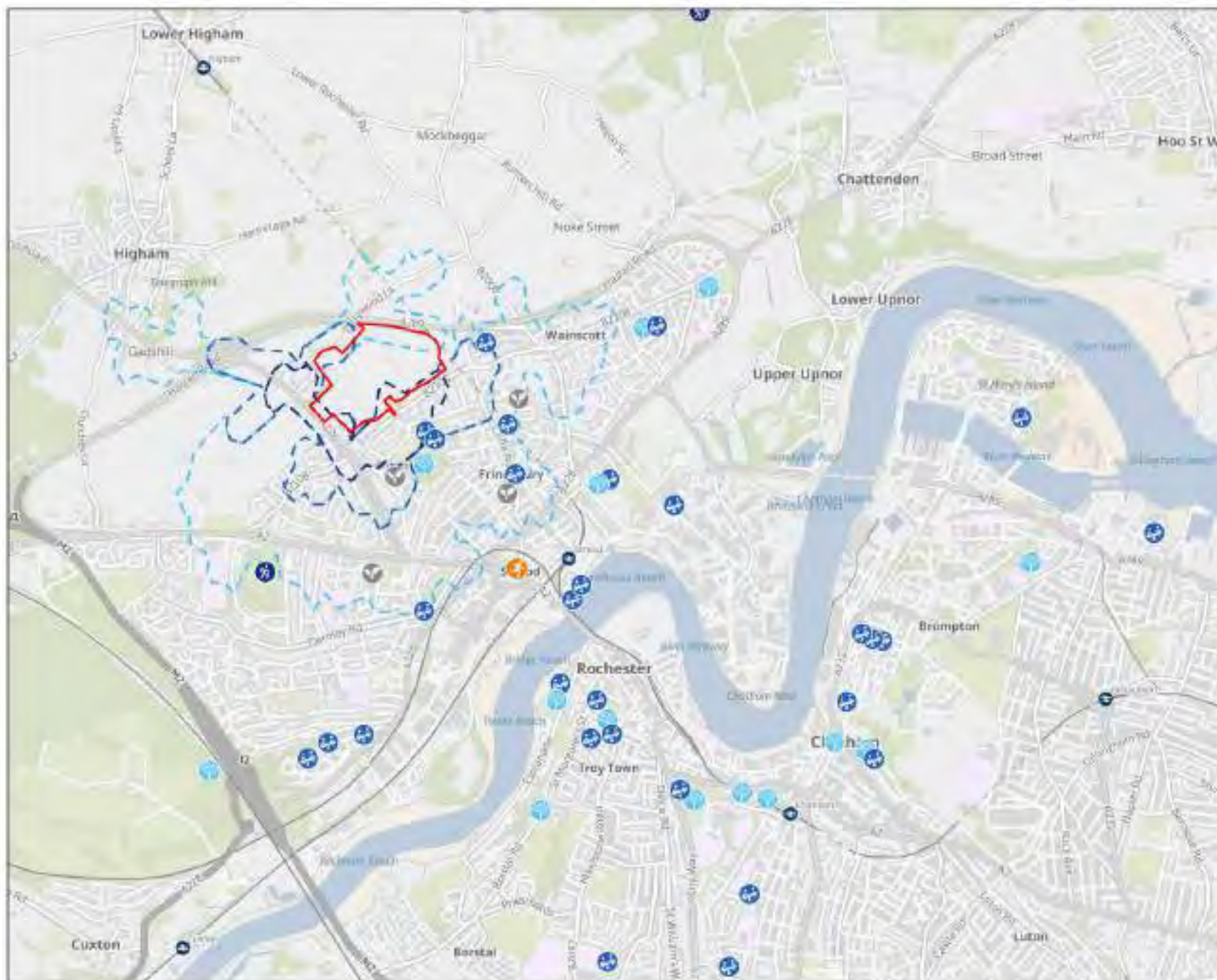
- 4.5.13 The overall quality of youth and children is mixed but generally good, with 10 sites scoring over 60% in terms of quality, and 5 sites scoring below 60%.

Allotments

- 4.5.14 Medway contains a total of 38 allotments, with Strood containing just four of these sites.
- 4.5.15 The closest allotment to the site is Broomhill Road, which is approximately 0.6km south of the site, or an approximate 4 minute walk.
- 4.5.16 Overall, there is no significant demand for allotments, but they should be highly valued within the community.

Summary

- 4.5.17 According to local policy, provision of open space is required as part of any residential development.
- 4.5.18 Strood contains no provision of Local Play Areas or Neighbourhood Equipped Areas of Play and provision of such amenities would be appropriate.
- 4.5.19 Due to the lower numbers of parks and natural/semi-natural greenspaces, provision of such amenities would be appropriate.



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- ⚡ Trail
- ⚡ Playground
- 🌳 Park
- ⚡ Civic Space
- 🌱 Allotments

4.0 Social Infrastructure

4.6 Social, Community, & Faith

4.5.1 There are several different community facilities and services within proximity of the site. For places of worship there are several churches in Strood, in Rochester there's a Synagogue and a Mosque.

4.5.2 There are no libraries or community centres within walking distances however the closest library is the Medway Archives Centre located approximately 1.4km (22 minute walk) and the closest community centre is All Saints Parish Hall located approximately 1.8km (24 minute walk) from the site.

Cemetaries & Churchyards

4.5.3 Out of 79 cemeteries which provide a total of 67.87ha in Medway, 6 are located in Strood and provide 6.65ha.

4.5.4 The cemeteries include:

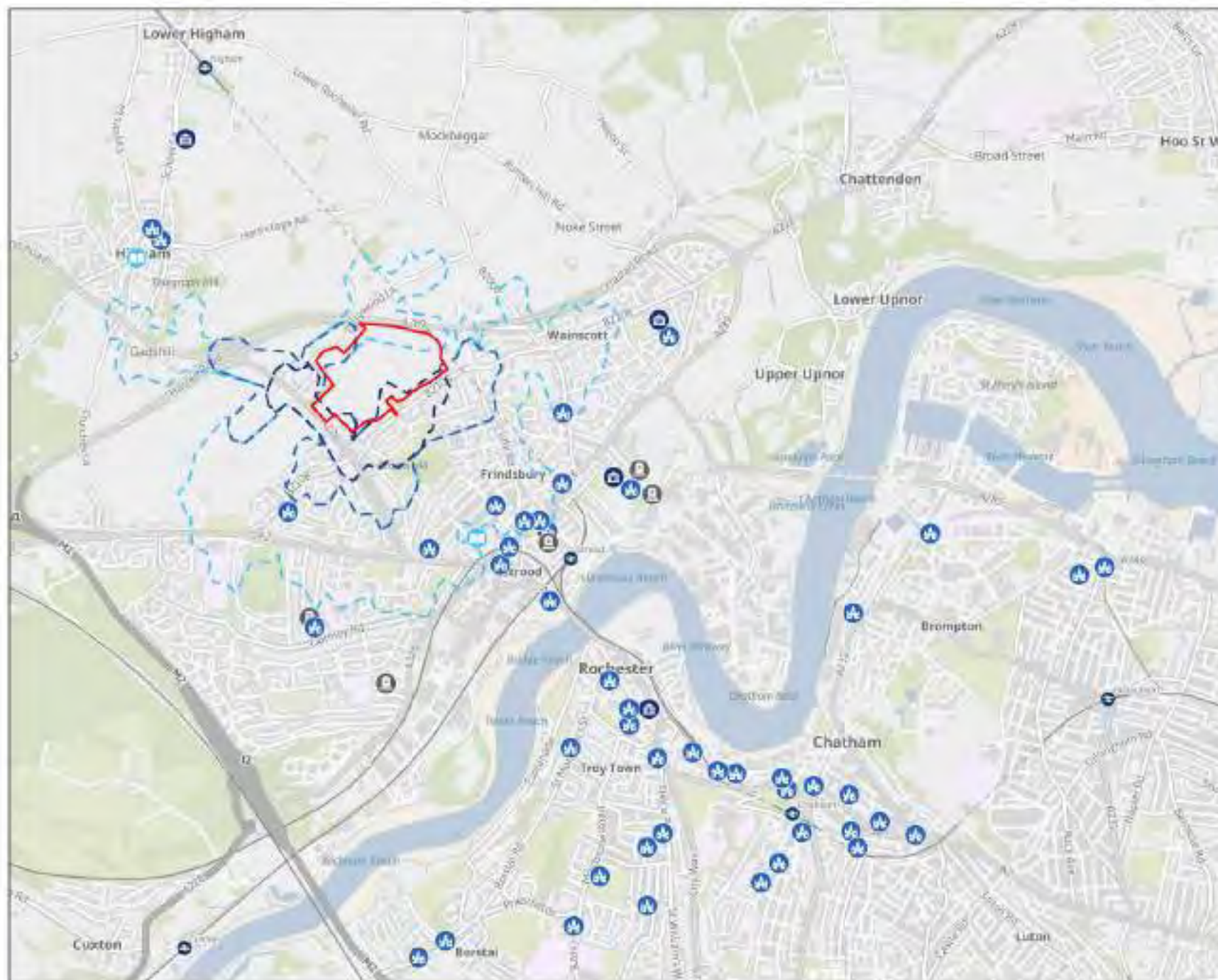
- All Saints' Church Cemetery, Frindsbury – 0.79ha;
- All Saints' Church, Frindsbury – 1.04ha;
- New Testament Church of God – 0.26ha;
- St Francis of Assisi Church – 0.31ha.



Medway Archive Centre



All Saints Parish Hall



Key

- Site Boundary
- 5 Minute Walk Distance (400m)
From The Site Access
- 10 Minute Walk Distance (800m)
From The Site Access
- 20 Minute Walk Distance (1600m)
From The Site Access
- Community Centre
- Special Workshop
- Library
- Cemeteries

4.0 Social Infrastructure

4.7 Convenience Retail

Convenience Stores

- 4.7.1 The nearest convenience store to the site is the Tesco Esso Express, located at a petrol station, offering a limited range of goods. The store is approximately 0.5km from the site, amounting to an approximate 3 minute walk. There are few other convenience stores located within appropriate walking distance of the site, of which are limited in size.
- 4.7.2 According to the SHENA Retail and Commercial Leisure Assessment, there are three larger food stores within Strood district centre, two



Tesco Superstore

of which are stronger performing, operated by Morrisons and Tesco.

- 4.7.8 The Morrisons store in particular is large and modern with a wide range of fresh food counters, whilst the Tesco store is rather dated, with a limited but reasonable product range devoted almost wholly to convenience goods.
- 4.7.9 The Retail and Commercial Assessment cites that Strood district centre is struggling for viability and vitality more than other areas in Medway. However, any proposals for a new convenience store would need to be informed by a retail impact assessment, regardless of size.



Morrisons

Pubs and Restaurants

- 4.7.10 The closest pub to the site is The Coach & Horses, which is located approximately 1.3km south of the site, amounting to an approximate 17 minute walk.
- 4.7.11 Other pubs located within an approximate 20 minute walk from the site include The Ship and the Weston Arms.
- 4.7.12 The nearest restaurant to the site, which is located 1km southwest from the site which is an approximate 15 minute walk.
- 4.7.13 Other takeaways in the surrounding area include Good Luck Chinese Takeaway, Papa John's, McDonalds, Domino's and Cobham Inn

Summary

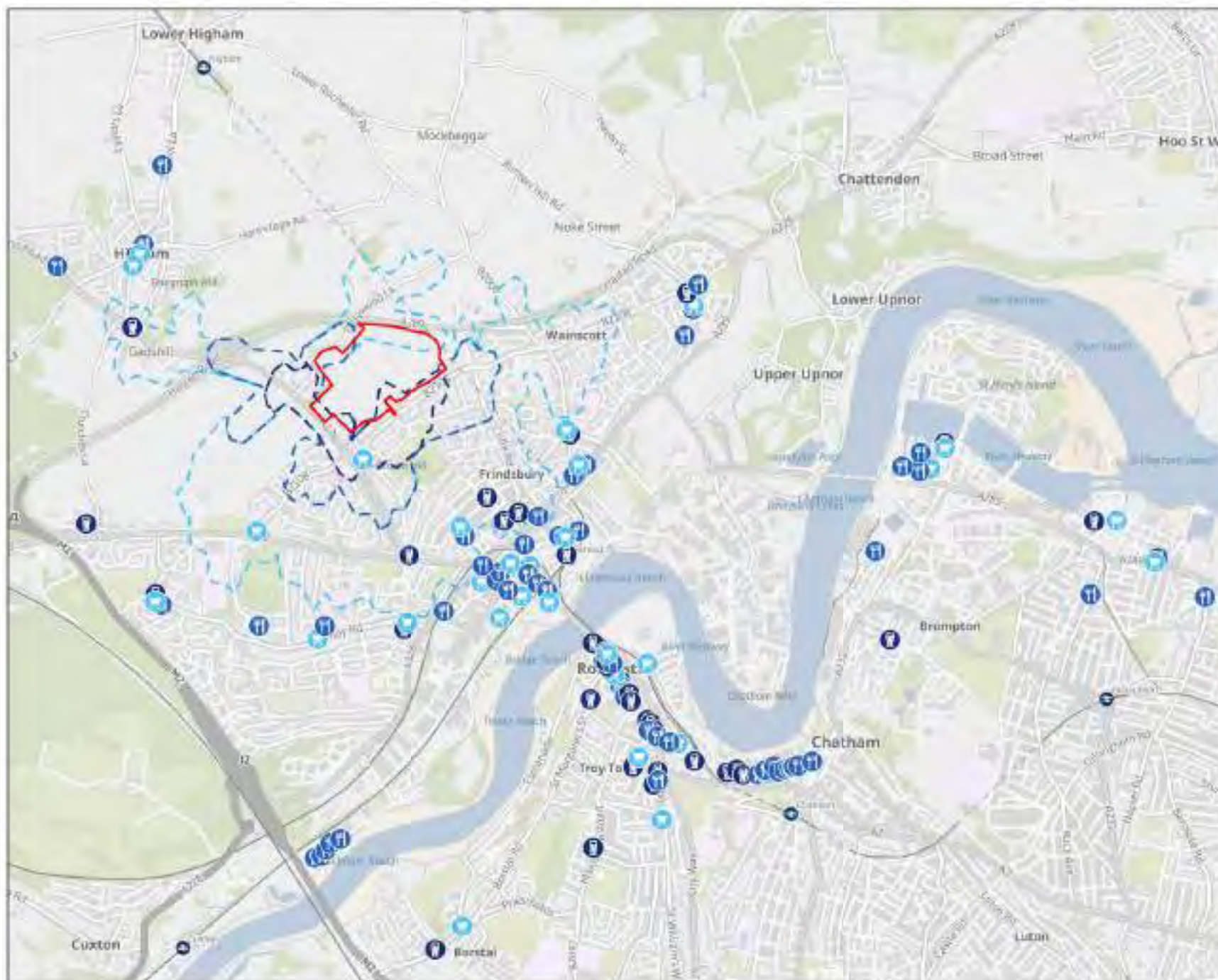
- 4.7.14 Overall, a convenience store as part of the proposed development would be ideally located to serve the c. 800 dwellings, and surrounding areas, however this would need to be informed by a retail impact assessment.
- 4.7.15 Strood appears to be plentiful in pubs and restaurants, and it is unlikely that a new pub or restaurant will be required, especially with other infrastructure being more in demand.



The Coach & Horses



Papa Johns



Key

- Site Boundary
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access
- P Pub
- R Restaurant
- S Shop

4.0 Social Infrastructure

4.8 Care Homes

4.8.1 There is a national trend of population ageing. With populations of older people growing, there is an increasing need for provision of care homes.

4.8.2 There are eight elderly care homes within a 20 minute walking distance of the site and 14no. assisted living residences within Strood. The majority of which are listed as assisted living residence, whilst others are nursing home and home care service.

4.8.3 The closest of these care homes is Shaws Wood Residential Care Home which is located 1.2km from the site, which is an approximate 18-minute walk from the site. Whilst walking distance is not necessarily a major factor, it does demonstrate that the site is located in an area that is sparser of care homes, compared to other areas of Strood.

4.8.4 Despite 14 assisted living residences being located within Strood, there is a growing need for provision care homes. The data gathered by the Care Quality Commission (CQC) in 2024 shows that there are a total of 1,465 registered beds for older persons, comprising of the following:

- 670 registered residential care beds

- 795 registered nursing care beds

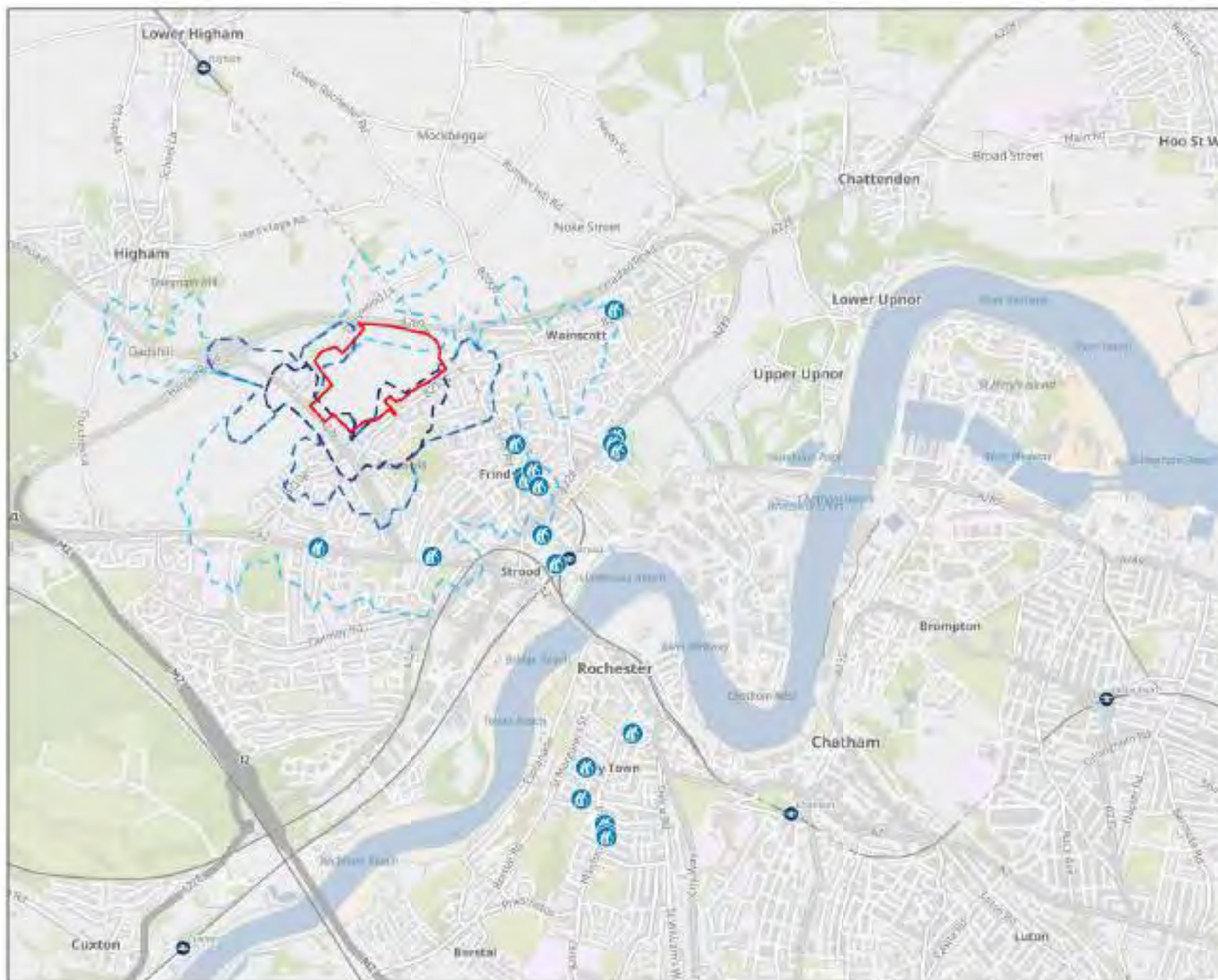
4.8.5 According to the Medway Adult Social Care Local Account 2020/21, by 2025, it is projected that the number of people in Medway aged 65 years and over will increase by 7.1% to 48,400 people, and that the number of people aged 85 years and over will increase by 11.5% to 5,800 people.

4.8.6 The Medway Extra Care Housing Needs Analysis 2011-32 concluded that 'there is clear scope to widen the range of housing and support options available to older people across tenures with the need for specialist housing services to enable the growing number of older people to live independently'.

4.8.7 Evidence to support a growing demand comes from a Needs Assessment, prepared by Carterwood in February 2023 to support a planning application for a 66no. bed care home in Halling (MC/23/0535), which stated that it is anticipated that the gross need for care home beds is expected to rise between 2023 and 2043 by c. 47%. Specialist care homes for those with dementia is also expected to rise.

4.8.8 The Needs Assessment also shows that there is a planned supply of 236 market beds and 76 specialist dementia beds by 2025, however there is no planned supply afterwards.

4.8.9 Overall, there is considerable scope to provide a new care home as part of the proposed development, given the trend of increasing numbers of people aged 65+ years and 85+ years.



Key

- Site Boundary
- 🏠 Care Homes
- 5 Minute Walk Distance (400m) From The Site Access
- 10 Minute Walk Distance (800m) From The Site Access
- 20 Minute Walk Distance (1600m) From The Site Access

4.0 Social Infrastructure

4.9 Other

4.7.1 Other services comprise banks, post offices, veterinary clinics and allotments. The majority of which are located south of the site towards Rochester.

4.7.2 The closest bank is Kent Reliance located approximately 1.7km (22 minute walking distance) south of the site.

4.7.4 The closest veterinary clinic is the Medway City Veterinary Centre located in the Medway City Estate approximately 3km (41 minute walk/ 8 minute drive).

Post Office

4.7.5 There is a total of 4no. post offices in Strood, with additional post offices located in Rochester and Higham.

4.7.6 The closest Post Office is The Temple Post Office which is located approximately 1.7km (22 minute walking distance) south of the site.

4.7.7 There are also a number of drop-off locations within Strood, although the closest location to the site is Frindsbury Drop & Collect Post Office, which is approximately 1.6km from the site which equates to an approximate 21 minute walk or a 5 minute drive.

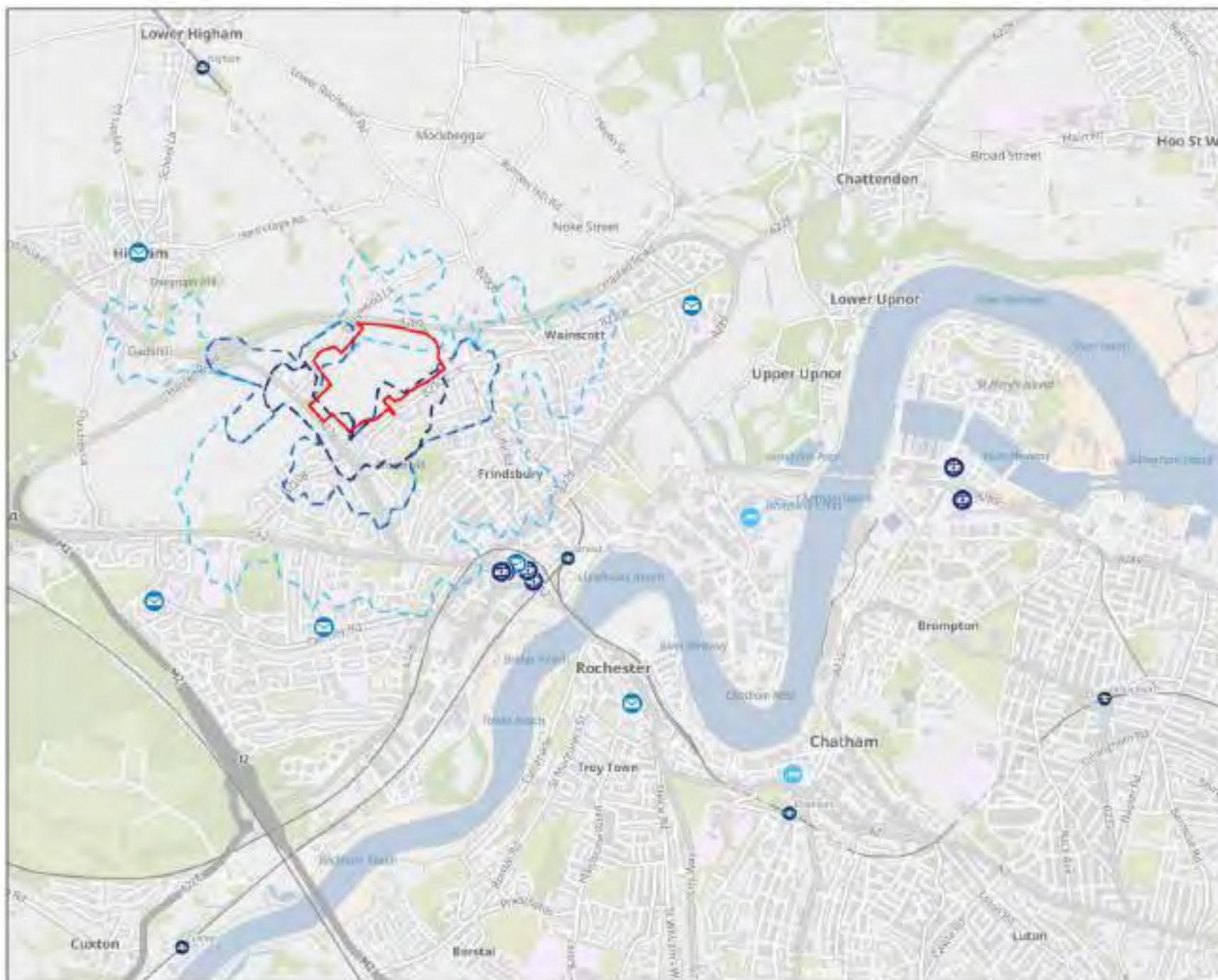
4.7.8 Geographically, the location of a post office as part of the proposed development would not be inappropriate.



Kent Reliance



The Temple Post Office



Key

- ▬ Site Boundary
- - - 5 Minute Walk Distance (400m) From The Site Access
- - - 10 Minute Walk Distance (800m) From The Site Access
- - - 20 Minute Walk Distance (1600m) From The Site Access
- Ⓢ Bank
- Ⓜ Post Office
- Ⓦ Well

5.0 Development

5.1 Development Proposal

5.1.1 The current concept masterplan is for the development of approximately 800 dwellings, a school and a neighbourhood centre containing small retail units and a medical hub.

5.1.2 The latest Illustrative Masterplan is included below:



6.0 Conclusion

6.1 Overview

6.1.1 Whilst it is difficult to demonstrate that provision of certain facilities will be appropriate as part of any development at Land north of Brompton Farm without any formal and thorough assessments, this report has studied the supply and demand of various facilities within Medway, and Strood, where the site is more specifically located within Medway.

6.1.2 The following conclusions of note can be made:

- There are conflicting reports about Green Belt Parcel 2, with Medway Council citing high contribution to the purpose of the Green Belt (without providing evidence) and Scarp Landscape suggest a much more limited contribution – an updated Green Belt Assessment is currently being prepared.
- Given the amount of proposed housing, it is likely that a new build school will be required rather than developer contributions, as set out by Medway's School Place Planning Strategy 2018-22. Due to the current capacity of nearby schools this is recommended to be a primary school.
- Despite higher no. of pharmacies per 100,000 than the national average, it is recommended that provision of pharmacies is reviewed should any significant residential developments.
- Geographically, provision of a new GP would alleviate the potential stress that a c.800 dwelling development would bring about, although this would need to be informed by a Needs Assessment and some of the challenges that GPs face in Medway include staffing and increased running costs.
- There is a very high current and future demand for 11v11 grassroots pitches, as well as moderate demand for 11v11 AGP pitches, although the AGP demand could be satisfied by a community use agreement with Strood Academy.
- With the exception of rugby union pitches, the level of demand for playing pitch provision of other sports is generally much lower.
- Regarding indoor sport provision, there is a preference to upgrade and refurbish existing facilities, rather than building new facilities.
- Given Strood's urban nature, the area is generally lagging behind other areas regarding quantity open space, however provision of green space

can be easily achieved.

- Any retail development would have to be informed by a Retail Impact Assessment, however, there does not appear to be a larger food store within close proximity to the site (closest is a Tesco Esso Store at a petrol station), especially when the primary larger food stores are located in the south of Strood.
- Based on the most recent Needs Assessment and other evidence documents, there appears to be a general demand for care home/elderly accommodation provision and incorporation of a care home/elderly accommodation element would be sensible, although a Needs Assessment would be required to be undertaken to determine the present needs.
- There appears to be good provision of childcare facilities and provision of such is likely not a high priority, although a development of c. 800 dwellings will likely increase the pressure on existing facilities.
- The location of a new post office within Brompton Farm as part of any development would not be inappropriate, although there appears to be sufficient childcare facilities (i.e. nurseries) provision within Strood to serve the site.

APPENDIX

4





Change Control.
To be able to manage and reach consensus that design work is compliant, monitor identified compliance risks and assess gaps in designers' competence, change control and record in connection with the Client, Principal Contractor and any Sub-Contractor thereafter must be ensured throughout all associated RIBA stages, including any variation to the design proposals imposed without prior knowledge of the Principal Designer otherwise the role of designer is assumed by the responsible party for the accountability and the duty of design.

- KEY
- Masterplan Boundary
 - Possible Site Entrance (Vehicular)
 - Open Space
 - Meadow
 - Play Areas
 - Green Corridors / Trim Trail
 - Suways
 - SUDS
 - Principal Access Route
 - Pedestrian Routes
 - Education
 - Sports/Playing Fields
 - Neighbourhood Centre
 - PROV
 - Promoted Walking Route
 - Existing Trees and Hedgerows
 - Woodland
 - Orchard

PO2	SUDs colour amended	ZA	29.06.24
Rev.	Description	By	Date



OSG ARCHITECTURE

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OSG Project No.
23/1442

Project Title
**Land to the North Side of
Rede Court Road,
Strood, Kent**

For **Barratt David Wilson Homes**

Drawing Description
Illustrative Masterplan

Scale @ A1:
1:5000

Date Created:
August 2024

Drawn By:
TK

Checked By:
TK

Approved By:
TK

Project No. Originator Volume LULoc Type Role Drawing No.
231442 - OSG - XX - XX - DR - A - SK001

Suitability:
S0

Revision:
P02

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APPENDIX

5



Broomhill Rise



Strood, Kent

Contents

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Effects on Green Belt purposes

Planning appraisal

Summary

Introduction

This vision document has been prepared to support the promotion of Broomhill Rise (Land to the North of Brompton Farm Road, Strood) in response to Medway Council's call for sites 2023. This document has been set out to respond to the key elements of assessment criteria and to identify the sites deliverability, viability and quality credentials.

An initial opportunities and constraints exercise has been undertaken. This has focused on a number of technical considerations, including access and landscape whilst also being mindful of the pattern of development surrounding the site and the importance of safeguarding the individuality and identity of the settlement.

This process has informed the development of an initial concept masterplan for the site and has led to the identification of a number of key layout and design opportunities. The overall proposal is provide a residential-led urban extension, whilst creating a development that maintains a natural transition between town and countryside.

The submission site lies within the Metropolitan Green Belt and within an Area of Local Landscape Importance however is otherwise free from planning constraints in all other respects. As set out within this document, it is considered that there are exceptional circumstances to allow Green Belt release, and that there is potential to develop the site in a way that will deliver a more sensitive transition between the urban edge and open countryside. These designations are therefore not considered a constraint to development.

The document concludes that the Site is located within a suitable area to allocate land for housing to help meet the growing need for homes in Medway and should be included within the emerging Local Plan.

Site SNF3 (Land at Brompton Farm) is being promoted with awareness of SNF1 coming forward through the Local Plan process. The Illustrative Masterplan can come forward whilst allowing the neighbouring site SNF 1 to also be delivered. The accompanying Transport Technical Note shows how the access and highway improvements through the preferred approach utilising a staggered signalised crossing could allow appropriate access to both sites SNF3 and SNF1.



and log pile habitats



Wild Flower Meadow

Community Allotments

School

View Point

Play

Neighbourhood Centre

Play

Play

Community Orchard

Play

Green Finger

Green Finger

Green Finger



Vision

Given the site's location within the Metropolitan Green Belt, an overriding objective would be to deliver a development that offers a better transition between the current hard urban edge and the open countryside by:

- Forming a development with a strong sense of place where people will want to live;
- Creation of a range of open spaces within the site that will provide visual amenity, ecological enhancement and community benefits in addition to creating a unique, site specific character;
- Exploring the opportunity to provide a new shop, doctors surgery and any wider social infrastructure needed to create a local neighbourhood centre;
- Proposals that deliver land for a school in an accessible location;
- Provision of key facilities that will aid a high quality of life and minimise trips made by car;
- Development located in a deliverable and sustainable location, close to existing local facilities, employment and transport links;
- The delivery of housing that is set against an identified local and national need, including affordable housing, housing for older people and self build plots;
- Further strengthening of existing foot and cycle links that further promote sustainable transport choice; and
- Consideration of flexibility within the masterplan to cater for future requirements of the community.



Healthy placemaking

As part of the vision for the proposals, the scheme will aim to create spaces to encourage a mixed community at different life stages. From a single young person looking for their first home, through to the elderly couple hoping to downsize, the proposed environment will create a series of spaces that are sustainable to accommodate future needs.

The proposed scheme would seek to deliver opportunities for people to lead healthier lives. The site is located within walking and cycling distance of a wide variety of existing facilities and amenities, and these movement methods will be encouraged over the use of the car. The proximity of green spaces and the variety of residential options will all help to drive a strategy for healthy place-making.

Key aspects of the principles for healthy place-making of the scheme include:

- Enable exercise in normal patterns of daily life;
- Provide easy access to education, accessible facilities and available green spaces;
- Limit the causes and effects of vehicle emissions;
- Provide safe, sociable and productive public environments; and
- Good urban and transport design.

Some of these principles have already been addressed by the location of the site. However, as the scheme progresses, there are further urban design decisions that can be made to help ease the challenge of health conditions caused by a modern lifestyle.

Shopping - exercise

Due to its location close to local shops and facilities in the surrounding area, the proposed site offers the opportunity to function as a “*Walkable Neighbourhood*”. Aldi and Asda supermarkets are located 1700m to the south in the centre of Strood, whilst other shops are available in the nearby on Frindsbury Road. Some of these offer a home shopping service helping to minimise shopping trips.

Education - exercise

The site is well located for nearby schools, accessed by a good network of pedestrian and cycle routes. The masterplan also includes a school site as part of the proposed scheme which will serve residents of the site and surrounding areas. Although some car drop-off and pick-up is inevitable, the good accessibility around the site by means other than the car will help limit its use. The proposals could encourage “*Safe-routes-to-school*” and “*Walking bus*” strategies.



Connecting with the landscape

A key aim of the proposals will be to enhancing people's quality of life by bringing them closer to nature through extensive new green infrastructure including woodland, trees and landscaped open spaces linked by paths and trails.

The provision of a wide variety of linked public open spaces for many different users, will encourage interaction and benefit the existing surrounding community as well as new residents.



Employment - exercise

The employment areas on the banks of the River Medway to the south east of the site are within walking and cycling distance of the site.

To help alleviate traffic and avoid the stress of commuting to work, homeworking would also be encouraged.

Leisure - exercise

The site could provide additional extensive areas of open space, providing a variety of formal and informal outdoor activities, including play areas, wildflower meadows and a community orchard. As many of the play spaces as possible will allow for disabled play. A Trim Trail could also be incorporated around the site with exercise stations spaced along its length providing opportunities for a variety of exercise options.

The site also benefits from easy and direct access to the countryside to the north via the public footpath network and Dillywood Lane.

Encouraging social interaction

The proposals for the site will provide a number of safe, sociable and productive public environments which will contribute to a lively social environment both on the site and within the wider community.

The open spaces will create places to meet allowing interaction with a wide variety of other users wishing to utilise the area for community use, events or celebrations. The open spaces will not only be used by occupants of the development but will provide a wider community focus. The connectivity plan above shows how many of the links across the site pass through the open spaces, creating many opportunities for interaction between various age groups and demographics.

The scheme should be designed to accord with the principles of 'Secured by Design' to minimise the fear of crime.

The inclusion of private rear gardens and amenity space offers the benefits of outdoor activity and the means for healthy food production.

The site

The site lies between Brompton Farm Road to the south and Hasted Road (A289) to the north and Gravesend Road to the west. It currently consists of a number of former agricultural fields with hedged field boundaries. The site area is 44.6 hectares.

In terms of vehicular access, the site benefits from different opportunities via Gravesend Road, Brompton Farm Road and Stonebridge Lane. It is situated within close proximity to Strood (1.6 miles) and Higham mainline railway station (2.6 miles) and benefits from excellent access to the strategic road network via the A2.

The town centre of Strood is an easily achievable walking distance from the site and a number of bus stops are available immediately south of the site on Brompton Farm Road with services to Strood town centre and on Gravesend Road with services to Gravesend and Chatham. Strood Academy and Bligh Primary School provide educational opportunities within 2 miles of the site.

The nearest railway station to the site is in the centre of Strood with regular services to Rainham, Faversham, Luton, St Pancras International and Tonbridge amongst others.



View from Stodes Close looking west (Google)



View from Stodes Close looking north west (Google)



View of site boundary along Gravesend Road (Google)

Aerial view of the site looking north (Google) ►



A289 - Hasted Road

Dillywood Lane

Public Footpath

Brompton Farm Road

Public Footpath

Gravesend Road

Broomhill Park

Rede Court Road

Abbey Court School

Broomhill Orchard

Considerations

An initial assessment of the site's opportunities and considerations has been undertaken, this process has helped shape the emerging masterplan to ensure the proposals respond to the site, its local context and give the development its own unique sense of place.

The physical considerations associated with the site and its context will inform and shape the development of the masterplan. Some of the key considerations include the following:

- Proximity to A289 Hasted Road to the north
- Location within Metropolitan Green Belt
- Existing trees and hedgerows
- Public rights of way across the site
- Relationship to existing properties on Brompton Farm Road and Gravesend Road
- Traffic noise from A289 Hasted Road
- Sensitivity of character along Dillywood Lane
- The topography of the site

KEY

	Site boundary
	Borough and Local Plan boundary
	Boundary of Metropolitan Green Belt Policy - BNE30
	Public Right of Way
	Existing trees and hedgerows
	Potential vehicular site access locations
	Open space providing buffer between development and Dillywood Lane
	General fall across site
	Traffic noise from A289
	Landscaped buffer zone
	Gas apparatus
	Water apparatus
	Route of Government oil pipeline
	20m buffer area
	Rail tunnel
	Pipe/line easements

Site considerations plan ►

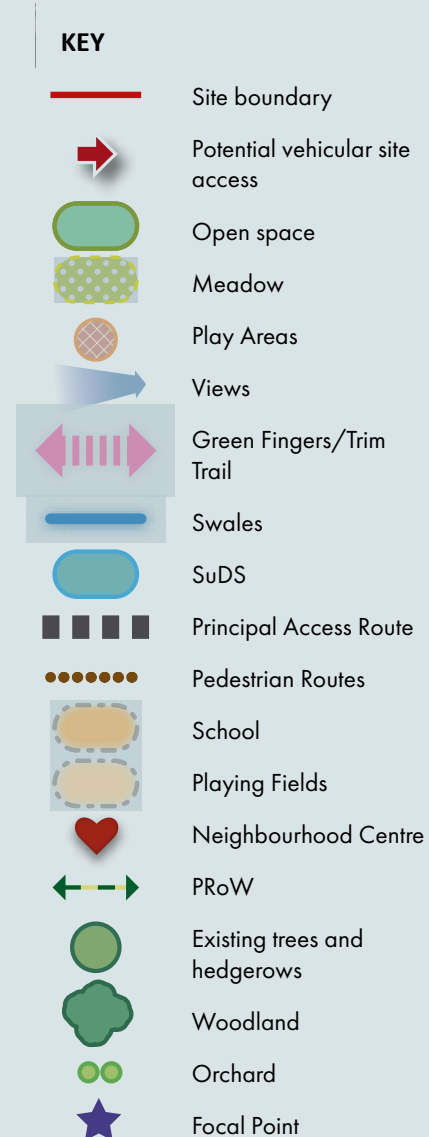




Opportunities

Having studied the site and its surroundings we have identified a number of opportunities that the site presents which make it an attractive and viable location for a new residential neighbourhood:

- Potential new vehicular access into the site from Gravesend Road and a secondary access from Strodes Close;
- Retention of the existing public rights of way network across the site and the creation of further pedestrian and cycle links within the site to increase permeability and access to the countryside north of the A289;
- The creation of a self-contained neighbourhood with its own identity and a strong sense of place;
- The provision of a good quality public realm with extensive areas of open space including woodlands, wildflower meadows, a community orchard and green fingers;
- The provision of a neighbourhood centre with small retail units and a medical hub to serve the new community;
- Potential provision of a school to serve the new neighbourhood and surrounding areas;
- Ecological benefits through the provision of woodland and pond habitats and green corridors through the development; and
- Opportunities for play and exercise including areas of linked open space with a variety for play opportunities and a fitness trail with exercise stations.



Site opportunities plan ►



Concept development

1. Green infrastructure

- New woodland and green fingers;
- Community orchard; and
- Buffer planting to A289.



2. Blue infrastructure

- Sustainable drainage features
- Swales; and
- Wildlife ponds.



3. Public Open Space

- Wildflower meadows;
- Community greens;
- Woodland walks;
- Green routes;
- Community allotments; and
- Children's play areas.





5. Movement network

- Pedestrian and cycle links along green fingers and through open spaces;
- Trim trail with exercise stations; and
- Mown paths through meadows.

4. Structural planting

- Tree planting to streets and open spaces; and
- Tree and shrub planting to development areas.



6. Development

- Development overlooking green spaces to provide natural surveillance;
- Residential areas sub-divided by green fingers and tree lined streets;
- New school site; and
- New neighbourhood centre with medical hub.





DILLWOOD LANE

Woodland Buffer

Ecological enhancements
including bird & bat boxes
and log pile habitats

View Point

Wild Flower
Meadow

Community
Allotments

School

Green Finger

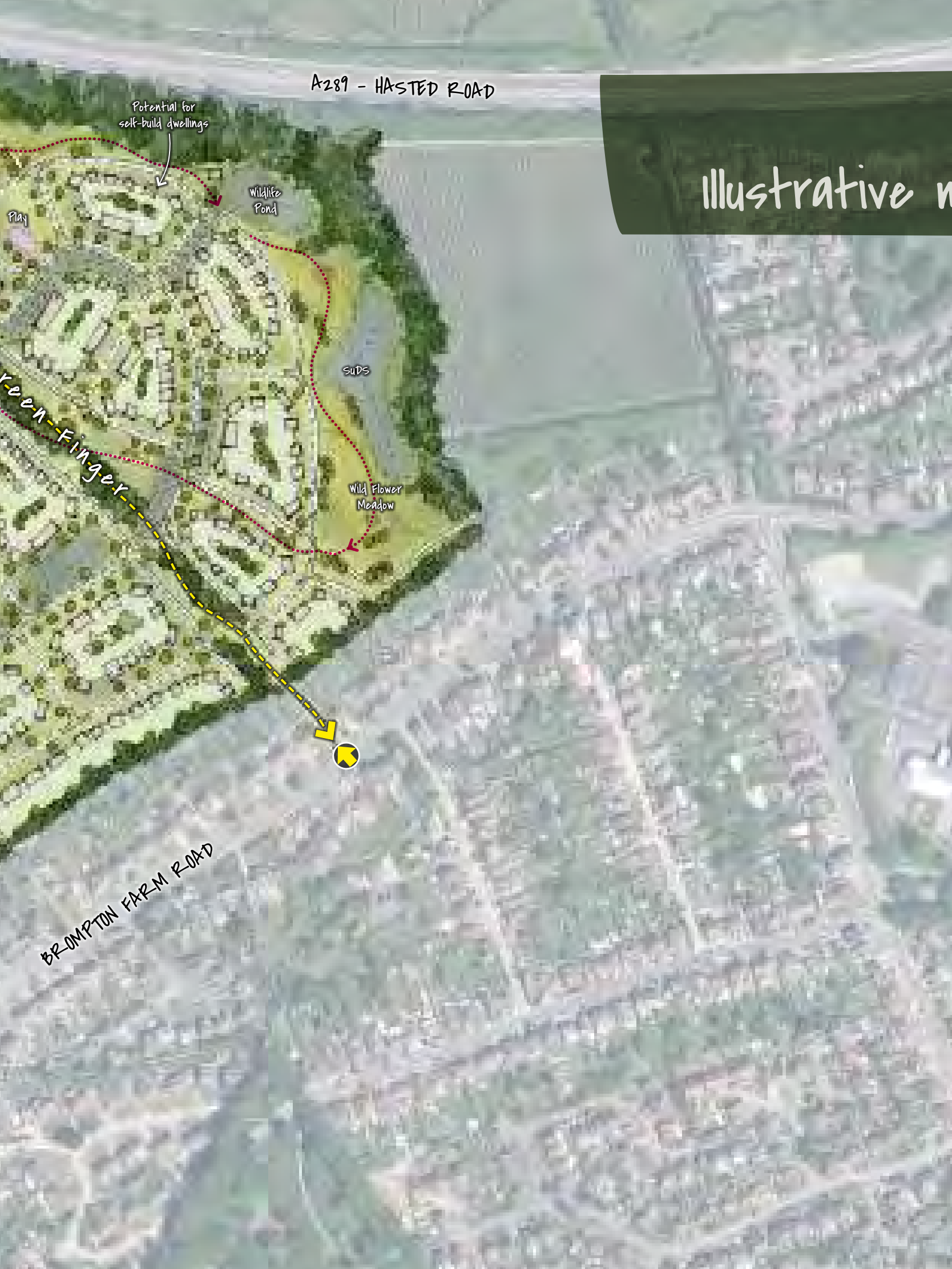
Neighbourhood
Centre

Green Finger

Community
Orchard

















0 20m 40m 60m 80m





Illustrative masterplan

KEY

-  Vehicular and pedestrian access
-  Pedestrian access only
-  Existing Public Right of Way
-  Trim Trail
-  Residential development parcels
-  Footpath/cycle links
-  Play areas
-  Wildflower meadows
-  Mown paths
-  Viewing area
-  Community orchard
-  Community allotments
-  SUDS features
-  Neighbourhood centre
-  School site
-  School playing fields

Illustrative landscape proposals

The vision is to create a new residential neighbourhood that:

- has a strong sense of place and community;
- is well integrated into the local landscape;
- embeds robust, ecologically rich, green and blue infrastructure;
- delivers exercise, recreation and food production facilities as community assets; and
- delivers resilience against climate change.

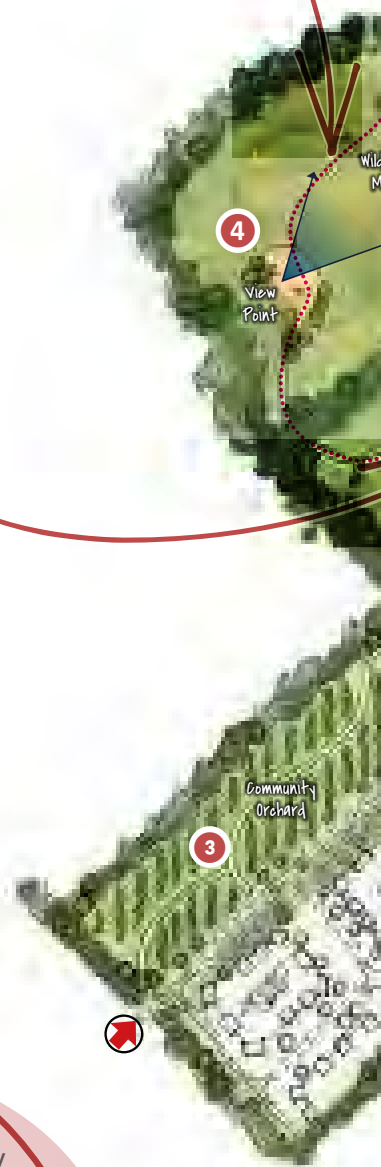
Green Infrastructure Framework (right) demonstrates how the site could deliver a strong framework of new publicly accessible green infrastructure (GI) and a wide range of community assets.

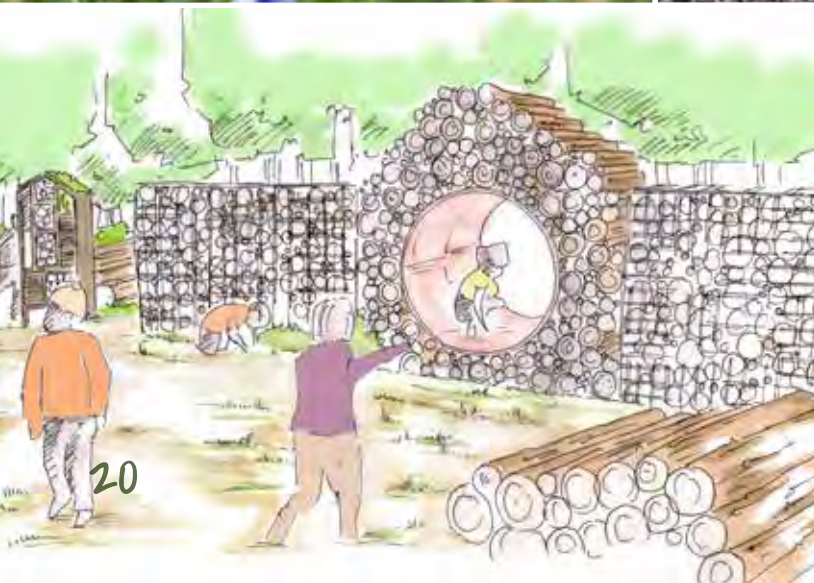
New walking and cycling routes across the site would enhance connectivity. The site would be well connected to both the existing urban area and the surrounding rural landscape via Dillywood Lane.

A wide belt of well-treed GI along northern parts of the site would conserve the rural setting of Dillywood Lane and provide a soft rural interface. It would also incorporate wildflower meadow (Ref: 1), new allotments (Ref: 2), a community orchard (Ref: 3) and a platform for viewing the rural landscape (Ref: 4). This local food production would help bring the community together, promote active lifestyles and help address food security.

Space would be provided for provision of well-treed, characterful streets.

The site would deliver in excess of 17ha of publicly accessible GI for existing and future residents, thereby addressing an existing deficiency for open space in Strood North ward and significantly exceeding Natural England's target for natural green space provision of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home.





Landscape & visual context

Landscape context

The site lies within the open countryside on the northern edge of the built up area. It forms part of the Metropolitan Green Belt (*Plate 1: Local Green Belt*) and the Dillywood Lane Area of Local Landscape Importance, which is “a gently undulating, visually diverse area of orchards and mixed farmland”. The local landscape also includes tree belts and scattered woods.

Strood extends up from the River Medway onto a broad hillspur that includes the well-treed Broom Hill (85m AOD) as a local high point. The site occupies the mid and lower north-facing slopes of Broom Hill. A secondary hillspur passes through the north-western part of the site to create a U-shaped landform that predominantly descends north-eastwards (*Plate 2: Local Landform, overleaf*). On the far side of this secondary hillspur, the land descends to form a shallow valley before climbing up again to join low hills on the edge of Higham.

The site comprises arable fields, orchards and areas of polytunnels. Two public footpaths across the site. The site

abuts existing housing to the southwest (along Brompton Farm Road), southeast (along Gravesend Road) and north-west (Dillywood Lane). It is also enclosed by Gravesend Road to the southwest, by Dillywood Lane to the north-west and by the well-treed corridor of the A289 to the north. Dillywood Lane has a rural character and provides a route to the countryside north of the A289.

Visual context

The built up edges of Strood, existing housing along Dillywood Lane and countryside to the north and west form part of the visual context for the site. The lower parts of the site, when viewed from the rural landscape north of the A289, are typically enclosed or heavily filtered by the A289 vegetation belts and by trees along Dillywood Lane. The upper parts of the site, where visible, are typically seen against a backdrop of housing at Brompton Farm Road, Strodes Close and Gravesend Road. This off-site housing lies at a higher level, is visually prominent and is visually harsh in places.

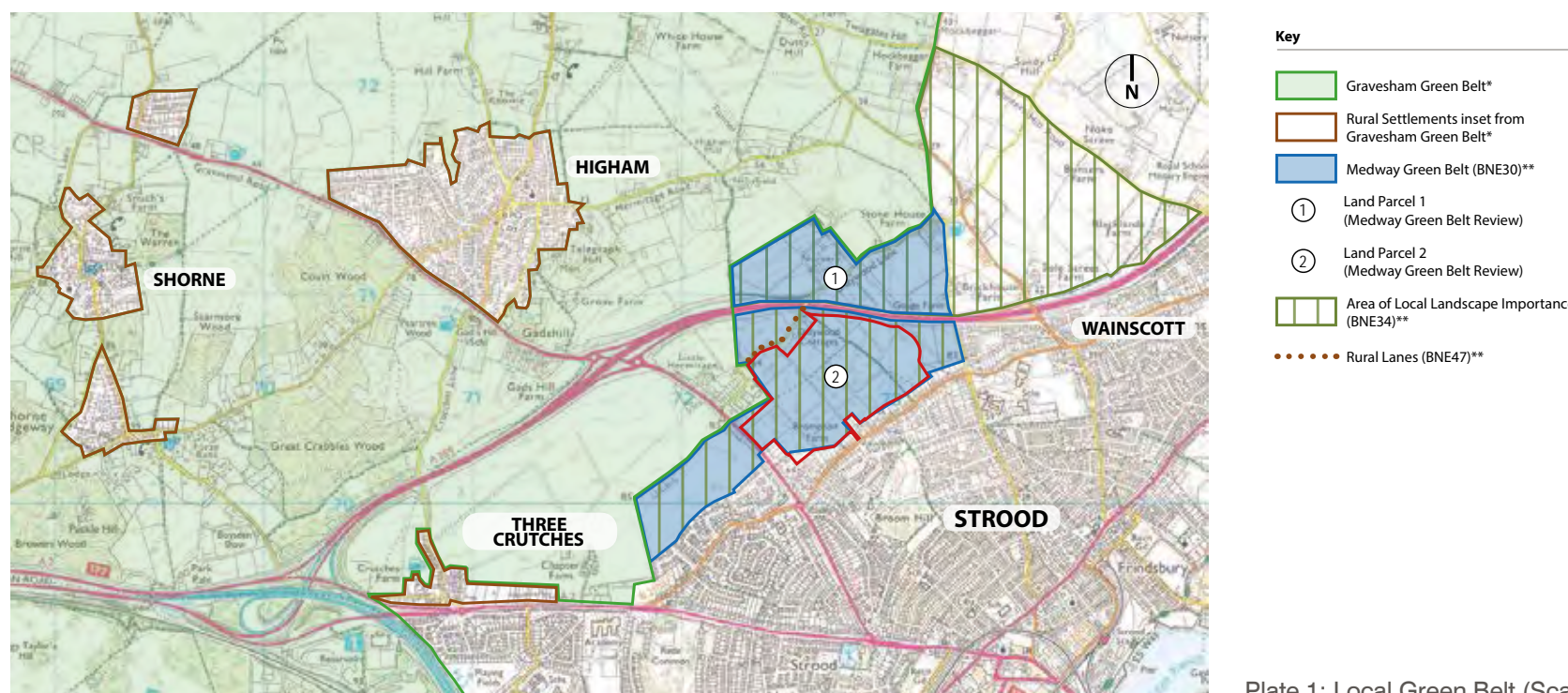


Plate 1: Local Green Belt (Scarp)

Green routes for
pedestrians and
cyclists, a fitness
trail and easy access
to existing Public
Rights of Way



Effects on Green Belt purposes

A detailed analysis has been undertaken of the effects of the development on the purposes of the Green Belt. This Green Belt Review study concluded that the Development would result in an overall moderate level of harm to the Green Belt based on its current contribution to Green Belt purposes and the minimal effects on the adjacent Green Belt land north of Dillywood Lane and the A289.

The Development would relate well, both physically and visually, to the existing built up area. The new built form would abut existing housing along its south-eastern and south-western boundaries. The Dillywood Lane housing area, the spur of elevated land on the north-western side of the site and the proposed belt of GI (with retained and proposed vegetation) would provide a strong sense of separation from the wider countryside to the north and north-west.

The Development would not result in sprawl in the sense of spreading out in 'an untidy or irregular way' due to the containment provided by the A289 to the north, by Gravesend Road and associated housing to the west and by existing housing along Dillywood Lane to the north-west. The existing inner Green Belt boundary is defined by a line of visually harsh line of housing that is unrelated to any physical landscape feature. The site would deliver a new relatively distinct and robust Green Belt boundary in the form of the well-treed A289 road corridor.

Whilst the Development would result in some harm to the Green Belt purposes of preventing sprawl of the built-up area and encroachment upon the countryside, this harm would be mitigated by this landscape-led masterplan and its associated compensatory landscape, recreational and ecological improvements to the Green Belt.

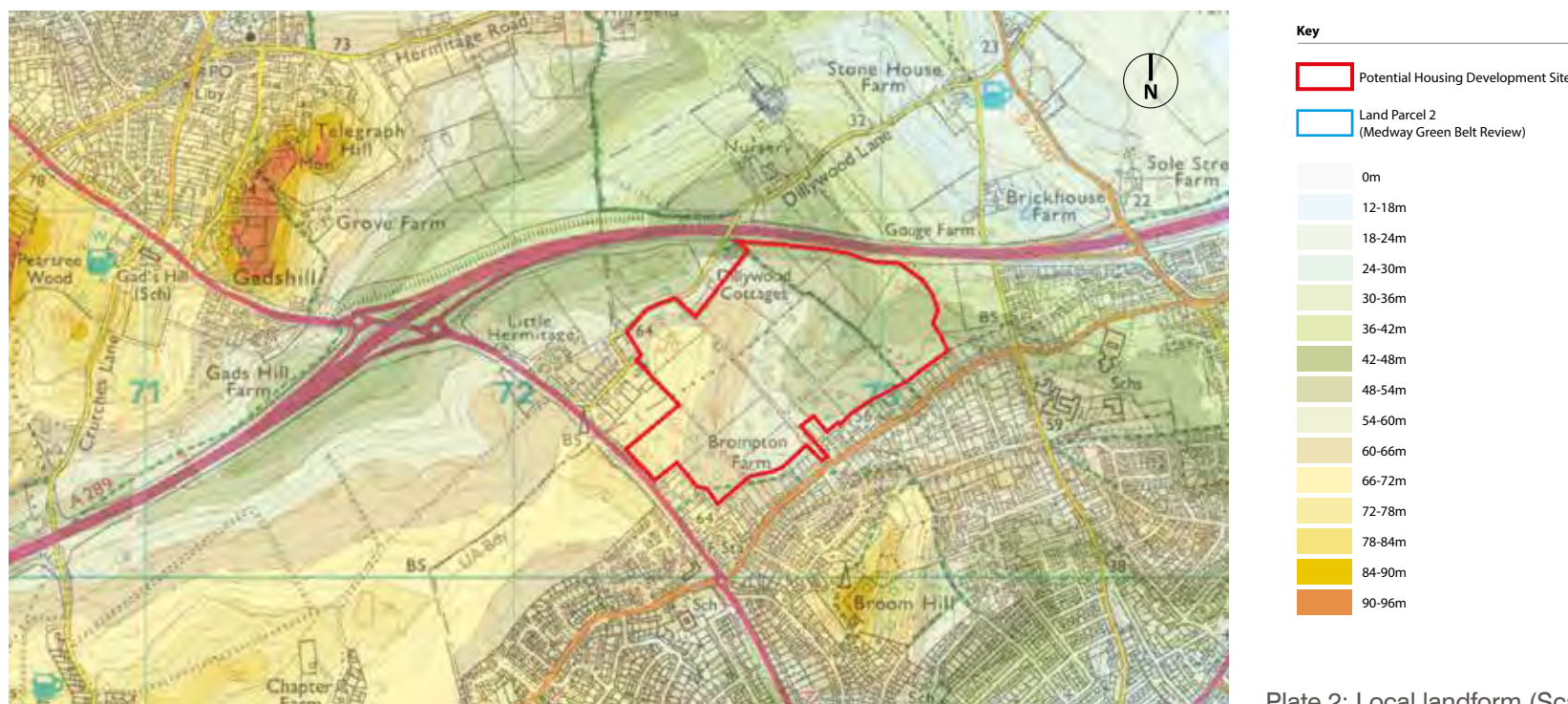


Plate 2: Local landform (Scarp)

Planning appraisal

Green Belt

As set out at paragraph 138 of the NPPF, Green Belt serves five purposes. Therefore we address the submission site in the context of each of these objectives below.

a) To check the unrestricted sprawl of large built-up areas

Urban sprawl can be defined as the advancement of sporadic and unplanned development beyond the clear physical boundary of a developed settlement.

Whilst this is a legitimate planning matter, there is no basis to assume that a well-planned strategy for Green Belt boundary review here would weaken or lead to any future risk of unplanned encroachment into the countryside. To the contrary, the submission site is located adjacent to the existing settlement boundary, so development would not result in sporadic or isolated housing. Instead, it would create a logical and well planned extension to the existing built development and would follow a similar pattern of development that has taken place elsewhere within the authority area. For example, Liberty Park to the north east.

Furthermore, this area of Strood is semi-rural in nature and does not represent a 'large built up area' that needs to be contained in the same was

as other urban and London Boroughs that are far more urban in character. Release of the site would also represent a consistent approach to that adopted for sites such as Liberty Park a short distance away. In addition, the latest version of the Gravesham emerging Local Plan has a potential for a new settlement on the boundary of the Borough immediately to the north of the site. This is also a Green Belt location and demonstrates that Gravesham also think that this is a logical and sustainable location for development.

b) To prevent neighbouring towns merging into one another

The submission site is located to the north of Strood and west of Wainscott. The closest settlement beyond this is Higham to the north west (1.6km) or Cliffe Woods to the north (2km).

If the Green Belt boundary was to be amended to allow development of the submission site there would remain at least 1.25km separation between the closest settlements. Furthermore, both are physically divided by the A289 Bypass.

For this reason, there is no basis to assume that there would be any demonstrable erosion of the space between settlements, nor would the development of the site increase the risk of any two settlements merging.

c) To assist in safeguarding the countryside from encroachment

Encroachment can be defined as the presence of development within the Green Belt not connected or adjacent to a built up area. As the site borders the currently defined settlement confines, development on this site would form a natural and logical extension rather than represent encroachment into the countryside. More importantly, it would protect genuine areas of open land from risk of development.

Therefore this purpose is not applicable to the site.

d) To preserve the setting and special character of historic towns

Medway as a whole has historically expanded in erratic patterns. However, there is no significant history or special character in respect of this particular area. Furthermore, it does not lie within a Conservation Area.

e) To assist in urban regeneration, by encouraging the recycling of derelict land and other urban land

Given the constrained nature of the Borough of Medway and lack of brownfield opportunities land further land is needed to be designated which is either greenfield or green belt. Therefore this purpose is superseded by the requirement as the brownfield opportunities and regeneration are already being maximised.

Taking all of the above into consideration, the site currently plays a limited role in fulfilling the core functions of the Green Belt.

Further to the above, we are of the view that were the site not in the green belt it would be one of the most logical, sustainable and deliverable sites available to the Council to allocate. Since the Green Belt designation the infrastructure of the bypass has been constructed to the north now giving a much more logical defensible boundary. Because Medway has only a limited amount of Green Belt as a proportion the boundaries never get reviewed and therefore sites such as this which are logical for allocation in all other senses get overlooked and sites which do not have such good sustainability credentials get allocated instead. Given the need for housing in Medway, and the benefits of the illustrative proposals, we consider there to be exceptional circumstances to allow Green Belt release.

Sustainability

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles which development of this site would contribute towards.

The provision of housing would help ensure that sufficient land of the right type is available in a sustainable location within the early phases of the emerging plan period. It would provide new homes in a location where people wish to live, namely in a semi-rural location with excellent access to both town, countryside and essential day to day services.

The delivery of housing would also provide an economic benefit during and after build out. Construction jobs

would be maintained or created, and household expenditure generated by future residents would support economic activity locally. Housing development would also enable the council and local community to benefit from revenue link to Section 106 contributions.

From a social perspective, a suitably designed mix of both open market and affordable residential units would provide housing in a sustainable location that has been in short supply in recent years and that will therefore help see the needs of present and future generations being met.

Finally, we consider that in selecting sites for development the wider environmental quality of the authority area must be taken into account. From a visual perspective the illustrative masterplan presented with this submission is clear that a residential and open space led approach is advocated in order to provide an appropriate form of development and a transition between town and countryside. Likewise, opportunity exists to build upon existing ecological potential and to enhance the habitat for protected and non-protected species alike.

Having regard to paragraph 7 of the NPPF and core sustainability objectives, we consider the site is sustainable.

Access to the site and strategic highway network

In terms of vehicular access, the illustrative masterplan indicates that the submission site benefits from different opportunities for access via both Gravesend Road and Brompton Farm Road. Sufficient land exists to ensure that a safe and efficient access meeting current highway design standards could be provided. It is situated within close proximity to Strood (1.6 miles) and Higham mainline railway station (2.6 miles) and benefits from excellent access to the strategic road network via the A2.

Within the Council's previous SLAA in 2018 the findings made little of the ability to provide a new connection to the A289 and direct links to the A2/M2 on the basis that no such upgrade is planned or funded at present. Given that the submission site is one of the few sites where such linkages are achievable, we consider that the site should score far more positively within the scope of the assessment in this regard.

Landscape impact

The site is situated outside of the built up area, within an area of local landscape importance. However there is potential for developing the site in a sensitive way that delivers a more sensitive transition between the hard, dense urban edge and the open countryside. Not only this, this transition has greater scope to be controlled by virtue of the firm boundary of the A289, which also has significant impact on the wider landscape.

The site's location in an area of local landscape importance is therefore not a constraint which would prevent development.

Trees

A number of trees and hedgerows lie within and around the edge of the submission site. None of these are subject to a Tree Preservation Order. Any future application would be accompanied by necessary Tree Surveys. Existing trees and hedgerows would be retained where possible. No trees or hedgerows are considered to present a constraint to development,

Public Rights of Way

Two Public Rights of Way cross the site. These can be incorporated into the site without constraining development potential, as demonstrated by the accompanying illustrative masterplan.

Flood risk

The site lies within Flood Zone 1 and is therefore not at risk of flooding.

Contamination

The site is not considered to have a likely presence for contamination and this would therefore not constrain development.

Archaeology and heritage

There are no heritage assets with or adjacent to the application site. The site is not known to have a presence for archaeology however mitigation for any potential archaeological finds can be secured by condition requiring a full archaeological investigation in accordance with a pre-agreed specification.

Noise and air quality

The site is not within an Air Quality Management Area and so this is not considered to present a constraint. Any noise or air quality related constraints can be addressed as part of a high quality masterplanning process and do not represent absolute constraints to development.

Agricultural land value

As part of the Council's previous assessment it was considered the site is situated on the best and most versatile agricultural land. The findings of this is however questioned, particularly as part of the land has historically been used for non-agricultural uses including car parking, and other commercial purposes. In this respect there are numerous concrete pads from former buildings on the site, and in places rubble to a depth of several feet. This means that the land cannot be used for agricultural purposes as machinery cannot be deployed due to the amount of debris below.

The agricultural land value of the site is therefore not considered a matter which would represent an absolute constraint to development.

Deliverability

In order for sites to be considered deliverable, they need to be available, suitable and achievable. These tests are reviewed below.

Availability

Availability is essentially about confirming that it is financially viable to develop and viability remains a central consideration throughout plan making. We can confirm that there would be no financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the plan period.

Suitability

For reasons set out in this statement the site is considered suitable for development. In summary, the site borders the currently defined town centre confines and would form a natural, logical and sustainable extension.

Residential development on this site would make a useful contribution to the housing land supply for both market and local needs affordable housing, which is tantamount to the exceptional circumstances needed to justify the altering of Green Belt boundaries.

Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

Achievability

The site is in two separate ownerships. However there are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

Key benefits

- A new sustainable neighbourhood
- Up to 17 hectares of accessible Open Space
- Extensive pedestrian and cycle routes
- Retention of existing Public Right of Way network
- High quality public realm
- Children's play areas
- Fitness Trail
- Community orchards and allotments
- Small retail units
- A medical hub
- A new school
- New meadow, wooded and wet habitat areas
- New homes including affordable provision and self build options



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