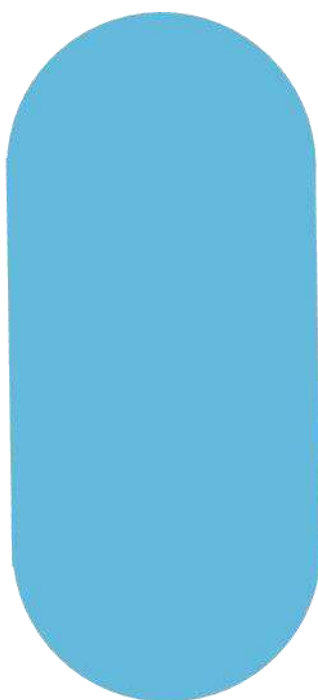




# **MEDWAY LOCAL PLAN REGULATION 19 REPRESENTATION**

**PREPARED ON BEHALF OF  
REDROW HOMES LIMITED**

**August 2025**





---

## CONTENTS

	Page No
1. INTRODUCTION	3
2. COMMENTS ON DRAFT LOCAL PLAN	5
3. CONCLUSION AND NEXT STEPS	14

## 1. INTRODUCTION

1.1 These Representations are made on behalf of Redrow Homes Limited ('the applicant') in response to the "*Medway Local Plan 2041 Proposed Submission Draft, Regulation 19*" (Reg 19 Local Plan) which was published in June 2025.

1.2 In summary, we support the preparation of the new Local Plan for Medway.

### **Land East of High Halstow**

1.3 Redrow have submitted a planning application for 760 dwellings on Land East of High Halstow ('the Site') which is identified for development under Policy SA9 in the Reg 19 Local Plan. Our response supports the preparation of the new Local Plan for Medway and provides recommendations to help the Council prepare a "*sound*" Local Plan to be submitted to the Secretary of State for examination in due course.

1.4 The applicant has previously made representations to the Reg 18 Local Plan in 2024 - and previous Local Plan consultations - and it is positive to see the Local Plan progressing.

### **Summary of our response to Reg 19 Local Plan**

1.5 Our response to the Reg 19 Local Plan in this Representations Statement first focuses on policies directly relating to the Site before responding to other relevant key policies.

1.6 These Representations should be read in conjunction with the Representations submitted by the Hoo Consortium - which Redrow is part of - which have been prepared by Stantec and cover the other relevant key policies in more detail.

1.7 In relation to High Halstow specific policies we support the allocation of the site and draft Policy SA9. Our main recommendations include the following:

- Council to review wording of draft Policy SA9 especially in respect of High Halstow Neighbourhood Plan (which is now withdrawn) and specific policy criteria to ensure that the policy more accurately reflects the approach to bring forward the Site to make it effective and consistent with national policy.
- Council to update the SHLAA to set out up to date and accurate information about the Site.

1.8 Our main recommendations on other relevant key policies include:

- Updating Duty-to-Cooperate material for Local Plan submission to document relevant discussions;



- 
- Provide further information on delivery and funding mechanism for key projects / infrastructure in the Infrastructure Delivery Plan and Viability Appraisal, as well as the Strategic Environmental Programme, and provide more accurate costs for key projects / infrastructure to set out more accurate S106 assumptions;
  - Add new Policy to set out housing target (and explain how it will be delivered over the plan period);
  - Include a housing trajectory summary in policy and IDP to support delivery of key projects / infrastructure;
  - Review draft Policy T9 to provide a more flexible approach to self build and custom housing;
  - Provide more information on potential for heat networks; and
  - Publish updated Local Plan evidence material and consult with key interested parties e.g. developers as appropriate.



## 2. OUR RESPONSE TO REG 19 LOCAL PLAN

2.1 This section provides our comments and recommendations on the draft Local Plan with specific reference to the following:

- Site Allocations, Draft Policy SA9: High Halstow and Policies Map;
- Evidence base including Strategy Housing Land Availability Assessment and Infrastructure Delivery Plan; and
- Other relevant key draft policies relating to vision and strategic objectives, spatial development strategy, natural environment, housing, retail, transport, communities and infrastructure, energy and duty-to-cooperate.

2.2 Our responses aim to help the Council prepare and submit a “sound” Local Plan in accordance with paragraph 36 of the NPPF whereby plans must be:

- *“Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant”.*

2.3 Our recommendations are explained in relation to the following tests of soundness:

### High Halstow

2.4 We support the identification of the Site at Land East of High Halstow in the Reg 19 Local Plan for residential-led development.

#### **Planning Application for the Site**

2.5 For context, Redrow submitted a planning application in March 2023 (ref: MC/23/0855) at the Site for:

*Outline permission with some matters reserved (appearance, landscaping, scale and layout) for the construction of 490 residential units (including affordable housing) and a primary school (Class F1 (a)) with new vehicular access points, car and cycle facilities and provision of public open space, sustainable drainage and landscape works.*

*Full permission for Phase 1 for the construction of 270 residential units (including affordable housing) and the local centre (up to 1,000sqm Use Classes E and F) with open space, associated vehicle, cycle and pedestrian access off Christmas Lane, upgrade of existing public right of way, associated services and infrastructure, public realm, landscaping and SUDs (together with off-site highway works).*

- 2.6 The planning application is based on the direction of travel of the new Local Plan, whereby the Site is currently (and has been previously) allocated for residential development for 760 dwellings. It is made in regard to paragraph 11 of the NPPF which promotes a presumption in favour of sustainable development, whilst it also engages the tilted balance as a result of the Council's housing position. The application delivers a wide range of benefits to the Council and local community and achieves sustainable development. The full suite of information submitted is accessible on the Council's planning portal.
- 2.7 Significantly, the proposed development achieves all the requirements of draft Policy SA9, and supports the implementation of the Council's vision, strategic objectives and growth strategy for Medway.

#### **Reg 19 Local Plan Site Allocations (Chapter 14)**

- 2.8 We support the identification of High Halstow as a location for a strategic site allocation. The delivery of these site allocations in the Reg 19 Local Plan will enable the Council's vision and strategic objectives for Medway to be achieved.

#### **Draft Policy SA9: High Halstow**

- 2.9 We support the preparation of the site allocation policy for High Halstow however we have some concerns around the specific wording of the draft policy, as for example some of the draft policy considerations stated do not form part of the development plan and are not in the public domain (at the time of writing) and some of the draft policy criteria do not accurately reflect the way in which the Site is expected to come forward. These elements of the draft policy are not effective and not consistent with national policy and therefore we recommend that the Council reviews some of the detail of draft Policy SA9.
- 2.10 Our comments and recommendations on draft Policy SA9 are summarised below.

Local Plan reference	Comment, recommendation & justification
Paragraph 14.13.2 – reference to “ <i>Work on the Neighbourhood Plan has included a Local Housing Needs survey and wider community consultation.</i> ”	We recommend that this text is re-worded to reflect actual position because the Neighbourhood Plan was withdrawn in 2022 and Local Housing Needs survey has not been published. At the time of writing, no Neighbourhood Plan documents have been published since it was withdrawn.
Paragraph 14.13.2 – reference to “ <i>two sites</i> ”.	We support this reference and confirm that Site 1 is for 760 homes (Redrow) and Site 2 is for 60 homes (Dean Lewis Estates).
Draft Policy SA9 Objective (point 1) – reference to “ <i>providing up to 820 new homes, a new primary school, attractive multi-functional green infrastructure and an additional centre providing commercial and community services.</i> ”	We recommend wording is updated to reflect the proposed development for the Site.  Suggested wording: providing <u>approximately</u> 820 new homes, <u>land for</u> a new primary school, attractive multi-functional green infrastructure and an additional <u>local</u> centre providing commercial and community services.”
Draft Policy SA9 Criteria (point 2) and “ <i>Subsequent design principles</i> ” (following Criteria 12) – reference to “ <i>masterplan</i> ”.	We recommend that the Council reviews “ <i>masterplan</i> ” references as Point 2 could be combined with “ <i>Subsequent design principles</i> ” (in policy criteria).  This policy criteria should recognise that development (at both sites under SA9) will come forward in a comprehensive manner. This approach would make the policy wording clearer especially because no masterplan is included in the Reg 19 Local Plan.  The masterplan submitted as part of the Hoo Consortium representations demonstrates how the Site is proposed to come forward,

	and this mirror the planning application for the Site.
Draft Policy SA9 Criteria (point 4) – reference to “ <i>avoid coalescence with nearby settlements, through planning for landscape buffers.</i> ”	Given the site allocation (defined on the Proposals Map) future development would not lead to coalescence with any settlements. There is a large gap (including physical features e.g. Peninsula Way, railway line) between the Site / High Halstow and any other settlements or allocations. Any proposals on Site would respect landscape character and include significant landscaping (on Site). As a result we recommend the Council reviews wording at point 4.
Draft Policy SA9 Criteria (point 6) – reference to “ <i>Housing shall meet local needs, with reference to the Medway Local Housing Needs Assessment, 2025, and other local evidence, such as in the preparation of the Neighbourhood Plan, or subsequent updates.</i> ”	Comment that Neighbourhood Plan was withdrawn in 2022 and Local Housing Needs survey has not been published.
Draft Policy SA9 Criteria (point 12) – reference to “ <i>The primary vehicular access will be from the roundabout by Christmas Lane. In addition to site specific transport requirements, developers will contribute to the delivery of highways mitigations to provide capacity to accommodate growth at</i> ” ... list of four schemes.	<p>We recommend wording is updated to reflect way in which developer contributions will be made.</p> <p>Suggested wording: The primary vehicular access will be from the roundabout by Christmas Lane. In addition to site specific transport requirements, developers will contribute <u>proportionately</u> to the delivery of highways mitigations to provide capacity to accommodate growth at...</p>
Draft Policy SA9 Site Specific Information – reference to HHH26 and HHH29.	We support the Council’s view on land uses and delivery over the plan period. We suggest that number of new homes are

	referenced as “ <i>approximate</i> ” figures, not up to figures.
--	--

- 2.11 Our recommendations to the Council on draft Policy SA9 are reflected in the Hoo Consortium representations.
- 2.12 It is also important to note that the planning application for the Site satisfies all of the criteria set out under draft Policy SA9, including draft Policy DM21: New Open Space, Outdoor Sports and Play Spaces (which is cross referenced in draft Policy SA9). The planning application for the Site is compliant with draft Policy SA9.
- 2.13 Other policies relevant to Site relate to housing and retail. These are discussed below in more detail under our response to other relevant key policies in the Reg 19 Local Plan.

### **Policies Map**

- 2.14 We support the Reg 19 Local Plan Policies Map as the Site (draft Policy SA9 site allocation) is shown in full on the “*North West*” map.

### **Evidence Base**

- 2.15 Our responses on key evidence base documents, including the Strategic Housing Land Availability Assessment (‘SHLAA’) and Infrastructure Delivery Plan (‘IDP’), which relate to proposals at the Site are summarised below.

#### Strategic Housing Land Availability Assessment

- 2.16 The Site is identified as “*HHH26*” in the Strategic Housing Land Availability Assessment (‘SHLAA’) on pg. 435-441.
- 2.17 We recommend that the site information is updated to accurately present the planning status of the Site. For example, the hybrid planning application was submitted at the end of March 2023. The description of development has also changed over the determination period.

#### Infrastructure Delivery Plan

- 2.18 The Infrastructure Delivery Plan (‘IDP’) states that “*the proposed developments around Chattenden and High Halstow will require the relocation and expansion by 1FE of both Chattenden and High Halstow Primary Schools by September 2028 and 2029*”.



- 2.19 The project schedule (pg. 102) states that at High Halstow the primary school will be expanded by 1FE and relocated and prioritised this provision as “critical”.
- 2.20 It is important for the Council to recognise that the planning application at the Site will enable the delivery of the primary school (as the applicant will provide the land for the new primary school).
- 2.21 There are no other references to infrastructure provision at High Halstow in the IDP. Further comments on the IDP are set out below in relation to housing (trajectory and S106 assumptions).

### Our Response to Other Policies

- 2.22 This section of our Representations provides our response to other relevant key policies in the Reg 19 Local Plan.
- 2.23 As previously mentioned, our response should be read in conjunction with Representations submitted by the Hoo Consortium. Each key section of the Reg 19 Local Plan is discussed below.

#### Duty to Co-operate (1.4)

- 2.24 It is positive that the Council has prepared a Duty to Cooperate Statement (June 2025) however, it needs to be advanced for Local Plan submission. We recommend relevant discussions (with neighbouring LPAs and other relevant parties) are fully documented and evidenced for Local Plan submission. The Inspector will review this matter in detail in Stage 1 of the examination as in accordance with the Localism Act 2021 LPAs have a legal duty to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters.

#### Vision and Strategic Objectives (2.1 and 2.2)

- 2.25 We support the vision and strategic objectives set out in the Reg 19 Local Plan, especially in relation to growth at the Hoo Peninsula and that the Council aims to meet its housing and economic needs in full. We support the ambition of the Council, and notable the planning application at the Site supports the Council's targets.
- 2.26 The challenge for the Council relates to deliverability and therefore we recommend that the full evidence base is updated and finalised for Local Plan submission (and we acknowledge these are “live” documents). In particular, further information on the delivery strategy and funding mechanisms for projects set out in the IDP and Viability Appraisal is essential. We welcome the opportunity to further engage with the Council where helpful in respect of finalising

evidence base material and see this as important to ensuring that development and infrastructure is able to come forward in a viable manner.

- 2.27 It is important to note that the planning application for the Site supports the Strategic Objectives, in particular providing new homes to meet local needs, directing development to the most suitable locations, supporting sustainable travel, delivering appropriate infrastructure, respecting local distinctiveness and promoting climate change resilience. Delivery of the Site supports the transformational change set out in the ambition of the Council's vision.

### **Spatial Development Strategy (Chapter 3)**

- 2.28 We support the identification of the Hoo Peninsula, specifically the settlements of Hoo St Werburgh, Chattenden and High Halstow, as a location to deliver around 30% of housing needs during the Plan period. This will contribute to the aspirations of the Local Plan to meet its development needs in full.
- 2.29 To support delivery, the spatial development strategy and to make the Local Plan effective and consistent with national policy, we recommend that a new policy is added to the Local Plan which sets out the Council's housing target and explains how it will be delivered over the Plan period. As part of this, we recommend a housing trajectory is clearly set out in the Local Plan. Currently, the SHLAA contains a site-specific trajectory however this should be simplified for the Local Plan and this trajectory would also assist the final production of evidence base material, such as the IDP.

### **Natural Environment (Chapter 4)**

- 2.30 We support draft Policy S1: Planning for Climate Change and draft Policy S2: Conservation and Enhancement of the Natural Environment.
- 2.31 In response to draft Policy S2, further information on the Strategic Environmental Programme ('SEP') is required for the submission Local Plan. Currently there is missing information on the funding mechanism and scale / apportionment of contributions and the cost does not appear to have been considered in the Viability Appraisal.
- 2.32 We also support the biodiversity net gain target of 10% which is in accordance with the statutory requirement.
- 2.33 We support Draft Policy DM3: Air Quality and the planning application at the Site promotes sustainable travel, including walking and cycling to reduce reliance on the private car. The proposals for the Site help create a sustainable 15 minute neighbourhood.

### **Built Environment (Chapter 5)**

- 2.34 We support draft policies on the built environment.

### **Housing (Chapter 6)**

- 2.35 In response to draft Policy T3: Affordable Housing, we are committed to the delivery of mixed and balanced communities including the provision of home to meet identified needs (as demonstrated by the application for the Site). It is important for the Council to recognise that a key consideration for development of the strategic sites (on the Hoo Peninsula) will be balancing infrastructure delivery and contributions to support sustainable growth against development viability. As a result, we recommend the S106 assumptions (per plot on Hoo Peninsula strategic sites) from the Viability Appraisal are refined because they are based on cost estimates (presented as a range) in the IDP. In practice this means the Council must critically and accurately assess the cost estimates in the IDP so that the S106 assumptions are based on a sound and robust approach.
- 2.36 In response to draft Policy T9: Self Build and Custom Housing, again, we are committed to providing a range of housing choices however we recommend that the policy requirement is made more flexible. This is to help ensure demand is met, and that there is no risk of over provision of self-build and custom housing. We recommend flexibility is required in relation to the level of provision, servicing of the plots and relationship to affordable housing provision.

### **Economic Development (Chapter 7)**

- 2.37 We support draft policies on economic development.

### **Retail and Town Centres (Chapter 8)**

- 2.38 High Halstow is referenced in retail policies: draft Policy S16: Hierarchy of Centres, draft Policy DM12: Local and Rural Centres and draft Policy T18: Shopping Parades and Neighbourhood centres. We support these policies and the planning application for the Site will help achieve the policy objectives. As a point of clarification, it would be helpful for the Local Plan to confirm the status of the new centre at High Halstow.

### **Transport (Chapter 9)**

- 2.39 We support the general approach to transport in the Reg 19 Local Plan. We recommend that the Council review and accurately costs highways improvements to ensure that the Local Plan is deliverable and sound. Further comments on this matter are set out in the Hoo Consortium representations.

### **Health, Communities and Infrastructure (Chapter 10)**





- 2.40 We support the infrastructure delivery alongside the development of new homes, and this is the approach that we have adopted in the planning application for the Site.
- 2.41 In response to draft Policy T29: Community and Cultural Facilities, we recommend that the Council reviews the policy to ensure that there is no double counting in relation to provision of facilities and contributions.
- 2.42 In response to draft Policy S24: Infrastructure Delivery, as previously mentioned, we recommend that the costs set out in the IDP are reviewed and refined to help provide more certainty to developers and enable a more accurate understanding of future S106 contributions. We recommend that the Council appoints its own cost consultant to review the IDP to ensure that the figures are accurate and the Local Plan is deliverable, and provide greater developer confidence and certainty. Further detail is set out in the Hoo Consortium representations.

#### **Minerals Supply (Chapter 11)**

- 2.43 We support draft policies on minerals supply.

#### **Waste Management (Chapter 12)**

- 2.44 We support draft policies on waste management.

#### **Energy (Chapter 13)**

- 2.45 We are committed to delivering sustainable and energy efficient development. Our main recommendation in relation to draft Policy T41: Heat Networks relates to the need for the Council to provide more information on the potential for heat networks. At this stage it is challenging to understand whether this policy is relevant to future development at High Halstow.



---

### 3. CONCLUSION AND NEXT STEPS

- 3.1 In conclusion, these Representations support the preparation of the new Local Plan for Medway.
- 3.2 We support the general approach set out in the Reg 19 Local Plan and support the identification of strategic sites especially at High Halstow.
- 3.3 Our recommendations aim to help the Council prepare and submit a sound Local Plan for examination and we would welcome the opportunity to further discuss any of our comments with the Council if helpful and review further revisions of Local Plan evidence base to help ensure that a sound plan is submitted for examination.
- 3.4 Finally, we confirm that we would like to participate in the Local Plan Examination. We consider this necessary because Redrow is bringing forward one of the key strategy sites allocated for development in the Local Plan.

## Model Representation Form for Local Plans

	<b>Local Plan</b> Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
---	---	---

**Name of the Local Plan to which this representation relates:**

**Medway Local Plan (Reg 19)**

**Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025**

Email: [planning.policy@medway.gov.uk](mailto: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	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Roland"/>
Last Name	<input type="text"/>	<input type="text" value="Brass"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Planning Director"/>
Organisation (where relevant)	<input type="text" value="Redrow Homes"/>	<input type="text" value="Marrons"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value=""/>

---

## 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 **See attached** Policy **See attached** Policies Map **See attached**

4. Do you consider the Local Plan is :

4.(1) Legally compliant

☒ Yes

~~No~~

4.(2) Sound

☒ Yes

☒ No

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

☒ Yes

~~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.

**See separate representations document**

(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.

**See separate representations document**

(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:

**To assist the Inspector in understanding the specific considerations for the strategic site at High Halstow and other key issues in the Local Plan relating to soundness, and our suggested modifications.**

**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>



Hillhurst Farm, Stone Street, Westenhanger, Hythe CT21 4HU  
Tel: 01303 814444 [www.bloomfieldsltd.co.uk](http://www.bloomfieldsltd.co.uk)

## **Future Medway Local Plan 2040**

## **Response to the Regulation 19 Consultation Medway Local Plan 2041 July 2025**

### **Sites known as:**

- 1) Land to the North of the A228, Grain Road, Lower Stoke, Rochester (AS14)**
- 2) Land at Middle Stoke, Grain Road, Rochester, ME3 9RS (AS15)**
- 3) Land to the East of the A228, Grain Road, Lower Stoke, Rochester (AS17)**

**On behalf of Mr Richard Castle**

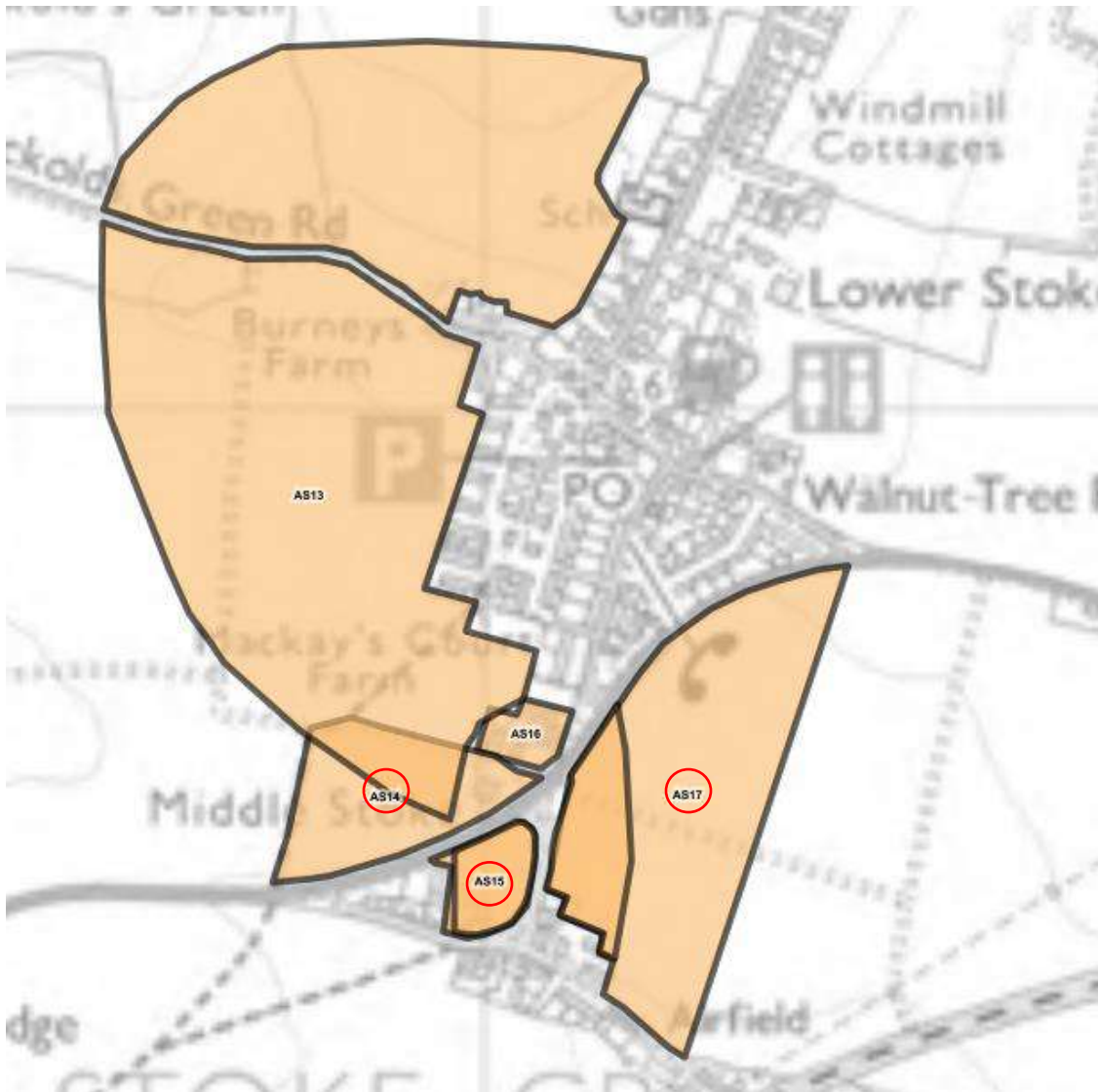
**Date:** 11 August 2025

**Job Ref:** 03.014.3201

# 1. Introduction

- 1.1. We are writing on behalf of our client, Mr Richard Castle and family, in respect of the Medway Council's Local Plan – Regulation 19 Consultation.
- 1.2. This representation supports the inclusion of allocation of three sites at Grain Road, Middle and Lower Stoke, for residential development, and which are not allocated as part of the current Regulation 19 draft Local Plan document. **This submission is supported by the inclusion of two *Design Development Statements* including site masterplans (Appendices 1 & 2)** that show how the sites have the obvious potential to accommodate development whilst having been designed having regard to specific site factors including heritage, utilities, flood risk, landscape etc. These should be read in conjunction with this representation and **Development Plan 3483.080.A also provided.**
- 1.3. The extent of the three sites, which were promoted through the call for sites process, considered in the Council's 2023 Land Availability Assessment (LAA) and promoted through the Regulation 18 2024 consultation and which are shown in **Figure 1** overleaf have been given the reference numbers as follows in the Council's LAA:
  - **AS14** – Land to the North of the A228, Grain Road, Rochester – 2.71 hectares
  - **AS15** - Land at Middle Stoke, Grain Road, Rochester – 0.86 hectares
  - **AS17** – Land to the East of the A228, Grain Road, Rochester – 7.82 hectares
- 1.4. Site AS15, already benefits from outline planning permission for 7 dwellings houses under reference MC/23/0106, with the possibility for further units on site. On this basis a masterplan has not been provided to promote this site at this stage, but given the existing permission, it is considered an allocation would facilitate the potential for further units.
- 1.5. Sites AS14 and AS17 are **capable of creating in the order of 90 and 180 units respectively, whilst having the opportunity to incorporate local retail facilities** (e.g in the form of a 'mini mart' / 'express supermarket') to serve the immediate locality, and the adjacent villages. There are **opportunities to provide BNG and landscape gains** on immediately adjoining land.
- 1.6. It is anticipated that the three sites could be **delivered, individually or collectively in the first 5 years of the Local Plan** period.

## 2. The sites and context



**Figure 1** - Extract from Medway LAA showing AS14, AS15 and AS17 (circled in red).

- 2.1. The sites would be very attractive to SME developers, a position that is supported nationally and locally. This should be seen as a positive way of delivering the NPPF intentions of paragraph 73, which identifies that *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly”*.



2.2. Historically, the Council selected the three sites for advancement in Local Plan (see **Figure 2** extract below), but have since removed them from the current proposal to focus on a more ‘urban led’ approach to housing delivery. Respectfully, it is considered that the Council should include the sites for allocation, on the basis that they offer local benefits, positively contribute to the Council’s need for housing, are cable of being accommodated in sustainably located positions (with the potential for additional local amenities), can be designed in ways that complement the sites themselves and their surrounding areas as demonstrated in the masterplan extracts at **Figure 3** (Site AS14) and **Figure 4** (site AS17); and the accompanying Design Development Statements (provided at **Appendix 2** and **Appendix 1** respectively). It is considered that this would also see the production of a more balanced, ‘dispersed’ Local Plan without compromising the local landscapes and creating multiple isolated sites that are unsustainable in nature or disproportionate to their surrounding environment.

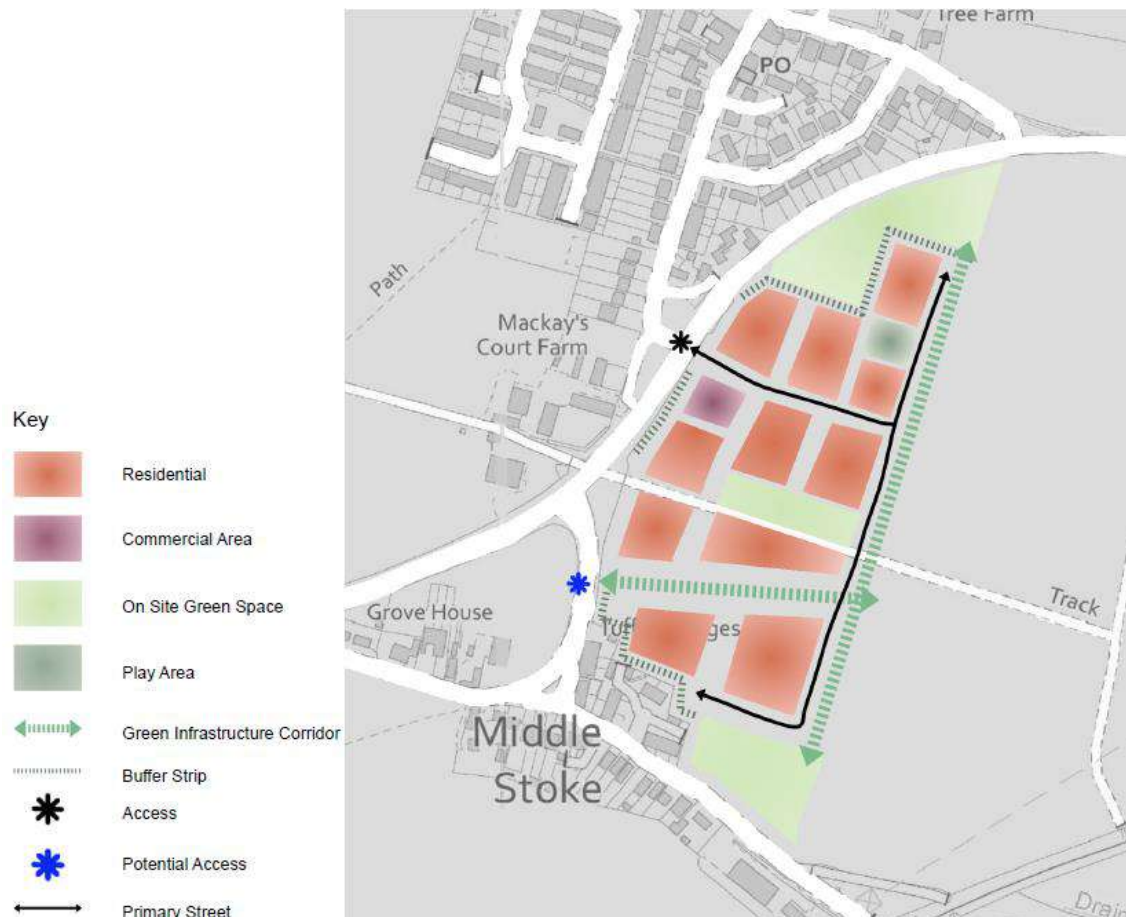
**Table 8.15:** Outline reasons for selection / rejection of reasonable alternative non-strategic sites for the MLP

Site ref	Site use	Selected / rejected	Outline reason for selection / rejection provided by Medway Council
AS1	Residential led	Rejected	Loss of BMV agricultural land. The development could lead to coalescence between settlements. Beyond reasonable walking distance to current public transport services.
AS10	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Principle of development established through planning consent. Opportunity for sustainable development, supporting improved services.
AS11	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
AS14	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
AS15	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
AS16	Residential led (Mixed-use)	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
AS17	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.
AS18	Residential led	Selected	The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services.

**Figure 2 – Table 8.1 of historic Medway proposals showing sites as selected for residential led schemes.**

- 2.3. This representation builds on previous submissions by Mr Richard Castle and family, who continue to promote the three sites, part of ownership of which is shared with the Church Commissioner (part of AS17), at Middle and Lower Stoke for residential led development.
- 2.4. Previous representations confirm that the location of the sites on the edge of an existing settlement are considered to be sustainable and suitable for a mixture of small-scale residential development for high-quality, low density residential development that incorporates economic development.

### 3. Indicative Masterplan for site AS17



**Figure 3** – Extract from Design Development Statement (see **Appendix 1** for full design analysis) showing an indicative masterplan for site AS17.

- 3.1. Using the constraints and opportunities of the site, a clear and logical development can be considered. Taking access from the A228 allows the development to be well connected and gives the opportunity to potentially create a new roundabout junction to improve the vehicle movements along the main road and into the existing residential developments. There is also potential for a second access further to the south to improve the traffic flow of the A228.
- 3.2. Adjacent to the main access to the site, a commercial area will be considered. This is a much needed space for the surrounding development, which currently lacks in local shopping and commercial amenity.

- 3.3. Green Infrastructure Corridors are created following the constrained areas of the site creating permeability and retaining the current setting of the area. Landscaping areas are created to the north and south, with the southernmost providing the possibility for sustainable drainage and attenuation processes.
- 3.1. Overall the design of the development would provide a well considered and logical solution to enhance the development of the area. This will in turn improve the surrounding existing residential development and provide well located, necessary homes.

#### 4. Indicative Masterplan for site AS14



**Figure 4** – Extract from Design Development Statement (see **Appendix 2** for full design analysis) showing an indicative masterplan for site AS14.

- 4.1. Using the constraints and opportunities of the site, a clear and logical development can be considered. Using the existing access allows the development to integrate well into the current built environment. This access then creates a natural buffer to the north between the development and agricultural yard, improving the quality of the residential units on site.
- 4.2. A Green Infrastructure Corridor Can be created to link up with neighbouring sites. This will both increase site permeability, improving views through the area, and create a further buffer from the road to the south. Landscaping areas will be created to the west, forming usable areas for residents and users of the public right of way These will also form a natural integration into the surrounding landscape.
- 4.3. Overall the design of the development would provide a considered and logical solution to enhance the development of the area improving the surrounding existing residential development and providing well located homes.

## **5. Strategic objectives**

- 5.1. These representations advocate that the Council looks for a larger number of sites to ensure that there are enough sites to meet the housing requirement, including the buffer. The use of smaller sites to meet this demand should be a desired approach, with the promoted site being able to assist with the delivery of this.
- 5.2. Whilst it is considered that the inclusion of all three sites in the Local Plan would be suitable, for the avoidance of doubt, this is not an 'all or nothing promotion' of the promoters, and this should not therefore preclude individual allocation if the Council consider this more appropriate.
- 5.3. In accordance with previous summaries drawn by the Council, large scale development around Hoo St Werburgh and neighbouring villages could provide for planned growth, where new housing is supported by new and improved services and infrastructure. Such development could also help to meet the Council's ambitions for greener growth, with higher environmental standards in construction, better connected communities within easy reach of local services.

- 5.4. Below is an illustrative plan that shows how sites AS17 and AS14, work as an overall plan when having regard to Middle Stoke and when taken together. A more detailed, scaled version of this plan is provided as part of this submission titled, **Development Layout, with DGW Ref 3483.080.A**.



**Figure 5 - Development Layout, with DGW Ref 3483.080.A showing how sites AS14 and AS17 work.**

## 6. Conclusion

- 6.1. These representation continue to promote the three sites referenced at Middle & Lower Stoke for potential site allocation in the Future Medway Local Plan 2041.
- 6.2. It is considered that the provision of housing development being delivered through rural development is supported. The sites provide an opportunity to deliver much needed housing development, whilst incorporating some economic development, without any identified constraints.

- 6.3. The accompanying masterplans demonstrate just how the sites (individually or as a whole) could be developed having regard to local and site specific 'constraints' that result in clearly considered schemes that are capable of delivering many local and Council wide opportunities.

## **Appendix 1 – Design Development Statement and Masterplan for site AS17**

## **Appendix 2 – Design Development Statement and Masterplan for site AS14**



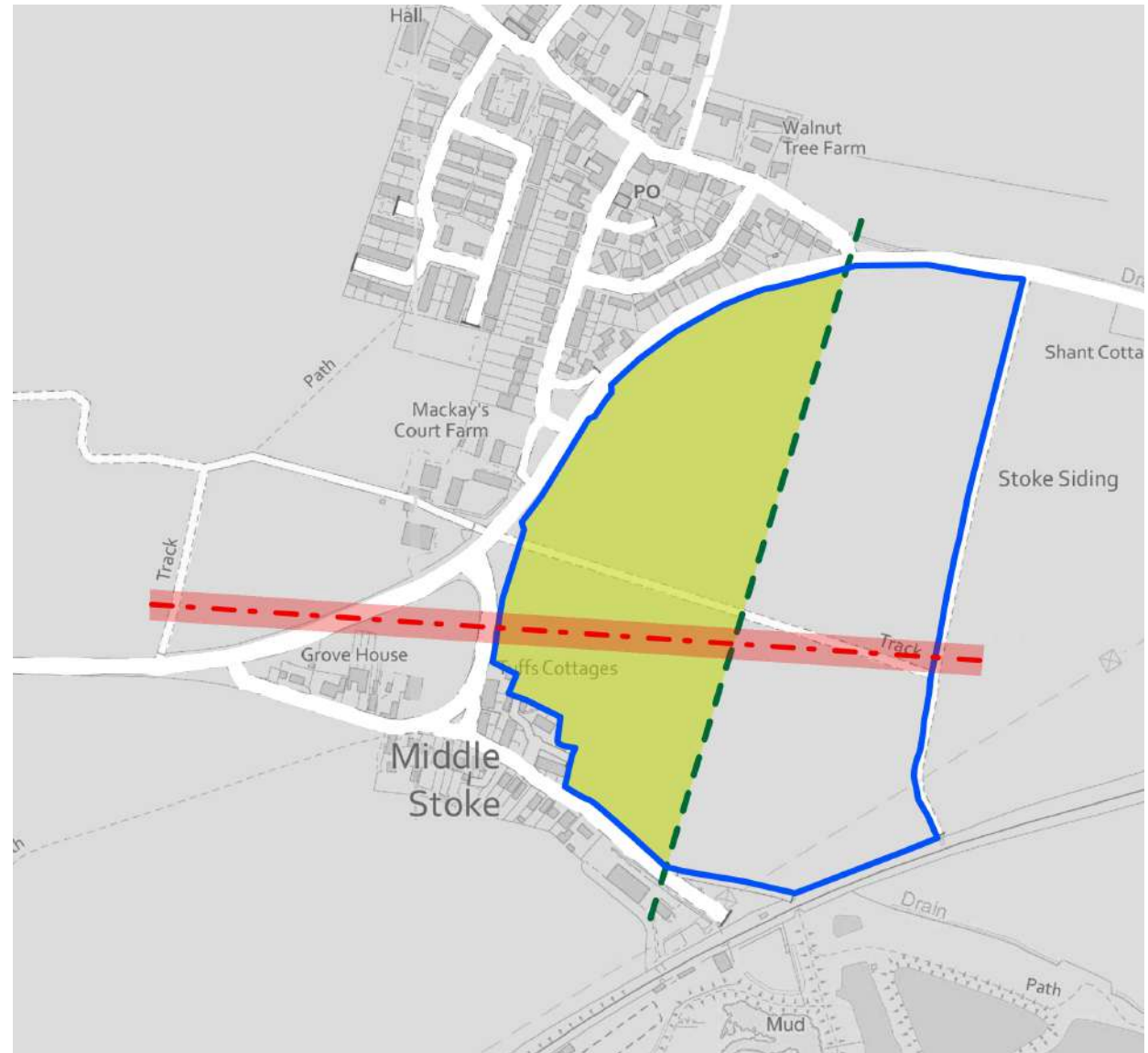
**Land East of the A228  
Grain Road  
Rochester**

Design Development Statement



The proposed development site benefits from being bordered by existing residential development to both the north and south. By following the existing urban grain line the site can be naturally divided to create a sensible and logical infill between the two developments. This line will natural form the boundary for the build development.

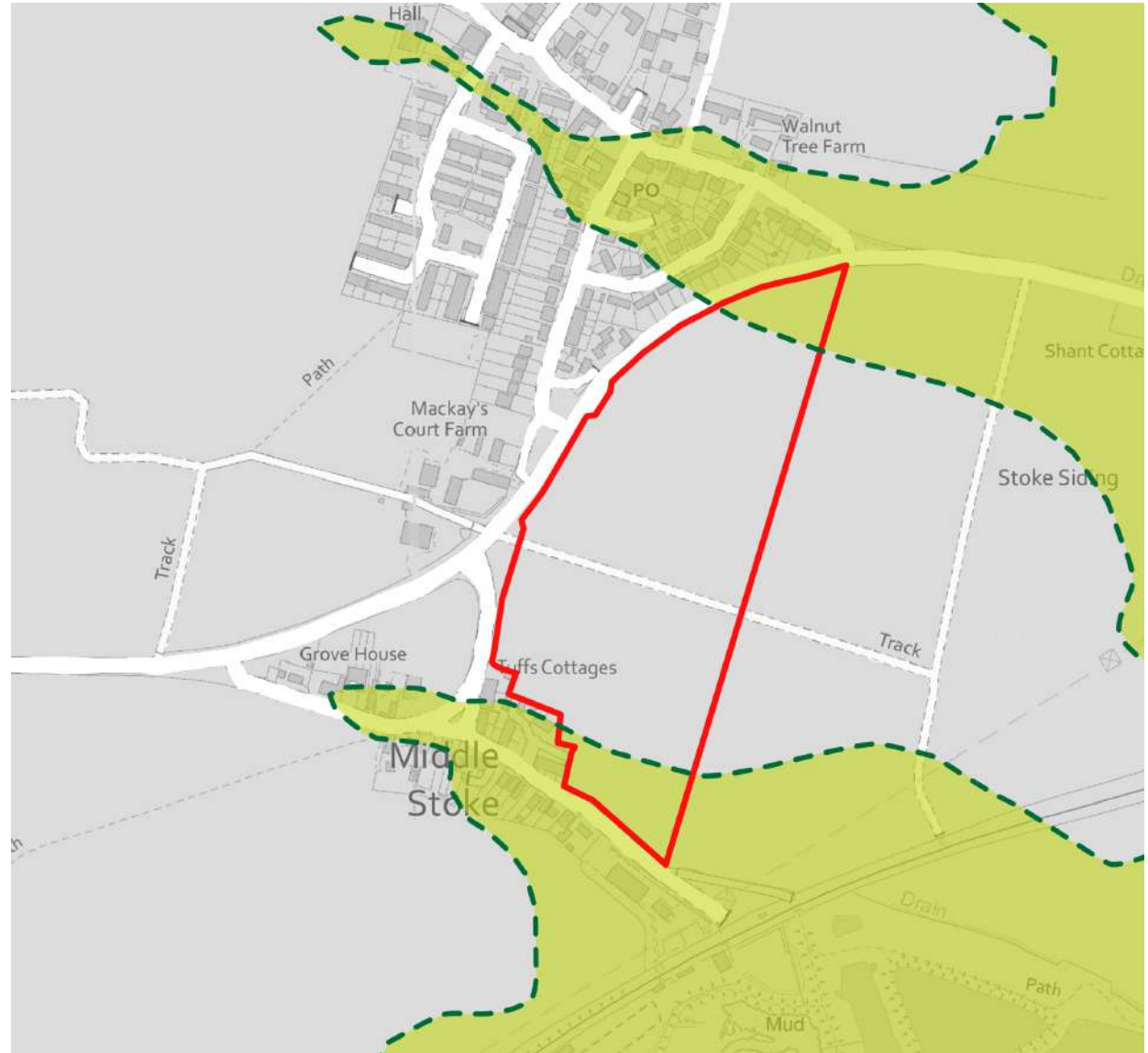
There is an existing High Pressure Gas Main running through the centre of the site. This forms a clear constraint on the site as shown on the diagram. The approximate location has been highlighted with a 10m easement on each side of the Gas Main.





The location of the site results in both the northernmost and southernmost areas being within both flood zones 2 and 3. This provides a natural constraint to the site and giving a clear boundary to the development boundary for any build form.

However, these two areas provide a natural buffer between the existing and proposed housing developments. It would be encouraged that these spaces be used as usable landscaping areas to encourage social cohesion among the development, providing well needed landscaped areas for walking and increased biodiversity of the area.



To the West of the site sits Mackay's Court, a Grade II Listed Farmhouse. The building is well screened from the road and therefore the proposed development site by vegetation (See Fig. 1). The external features of the property, including its Sash windows and brick facade, would likely create opportunities within the design of the proposed development to enhance this setting and provide a betterment to the historic importance of such dwellings in the area.



(Fig. 1 - Image taken from Google Street View)

Additionally, the site of an Ancient Burial Ground encroaches onto the north of the development area. Again this area provides an opportunity to enhance this historic setting and create a usable and needed space for the existing local community, whilst naturally buffering and improving new development in the area.



Using the constraints and opportunities of the site, a clear and logical development can be considered. Taking access from the A228 allows the development to be well connected and gives the opportunity to potentially create a new roundabout junction to improve the vehicle movements along the main road and into the existing residential developments.

There is also potential for a second access further to the south to improve the traffic flow of the A228.

Adjacent to the main access to the site, a commercial area will be considered. This is a much needed space for the surrounding development, which currently lacks in local shopping and commercial amenity. Provision of this would not only enable the expansion of the surrounding settlement, but also improve on the existing quality of this residential area.

Green Infrastructure Corridors are created following the constrained areas of the site creating permeability and retaining the current setting of the area. Landscaping areas are created to the north and south, with the southernmost providing the possibility for sustainable drainage and attenuation processes.

Overall the design of the development would provide a well considered and logical solution to enhance the development of the area. This will in turn improve the surrounding existing residential development and provide well located, necessary homes.

## Key

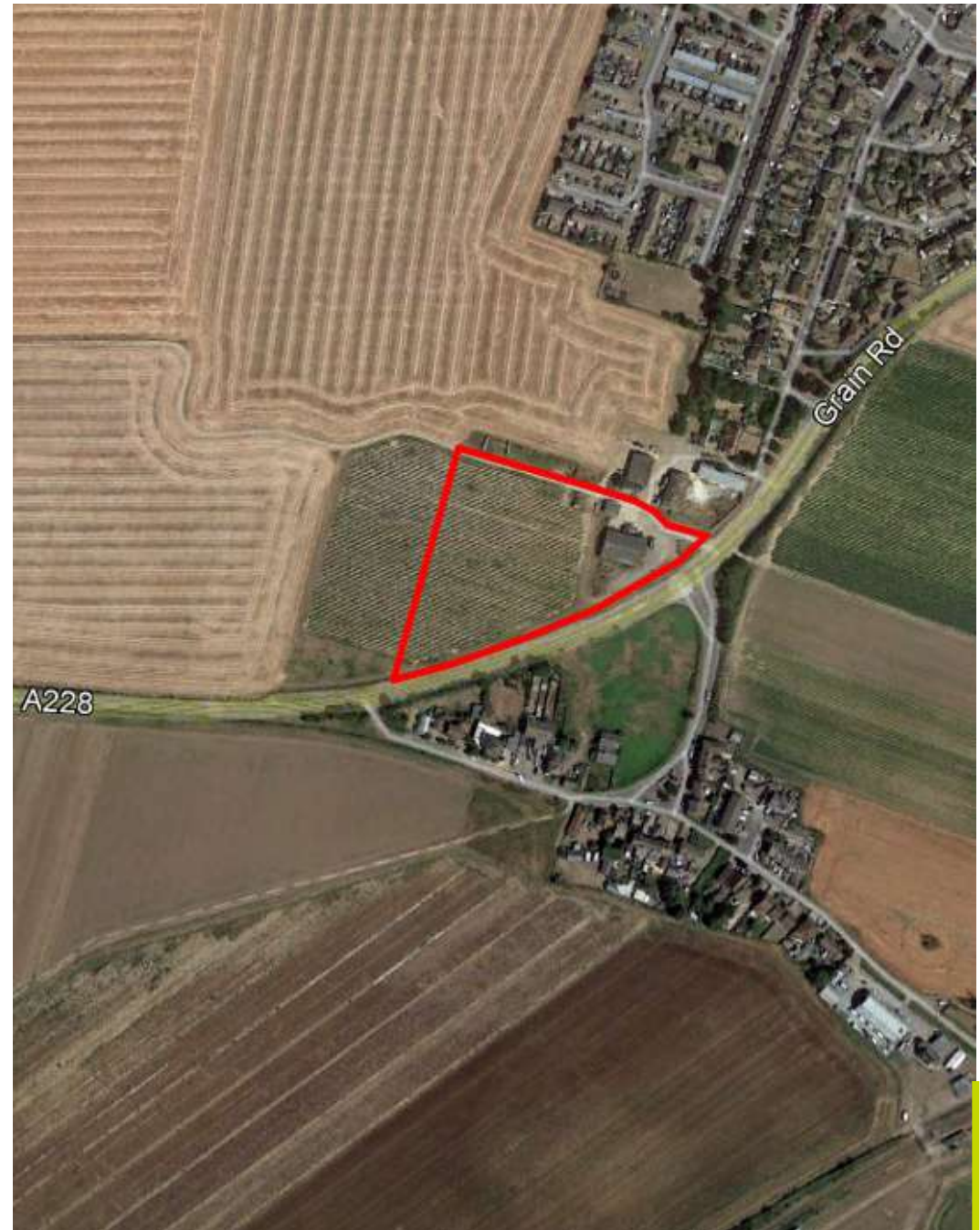
	Residential
	Commercial Area
	On Site Green Space
	Play Area
	Green Infrastructure Corridor
	Buffer Strip
	Access
	Potential Access
	Primary Street





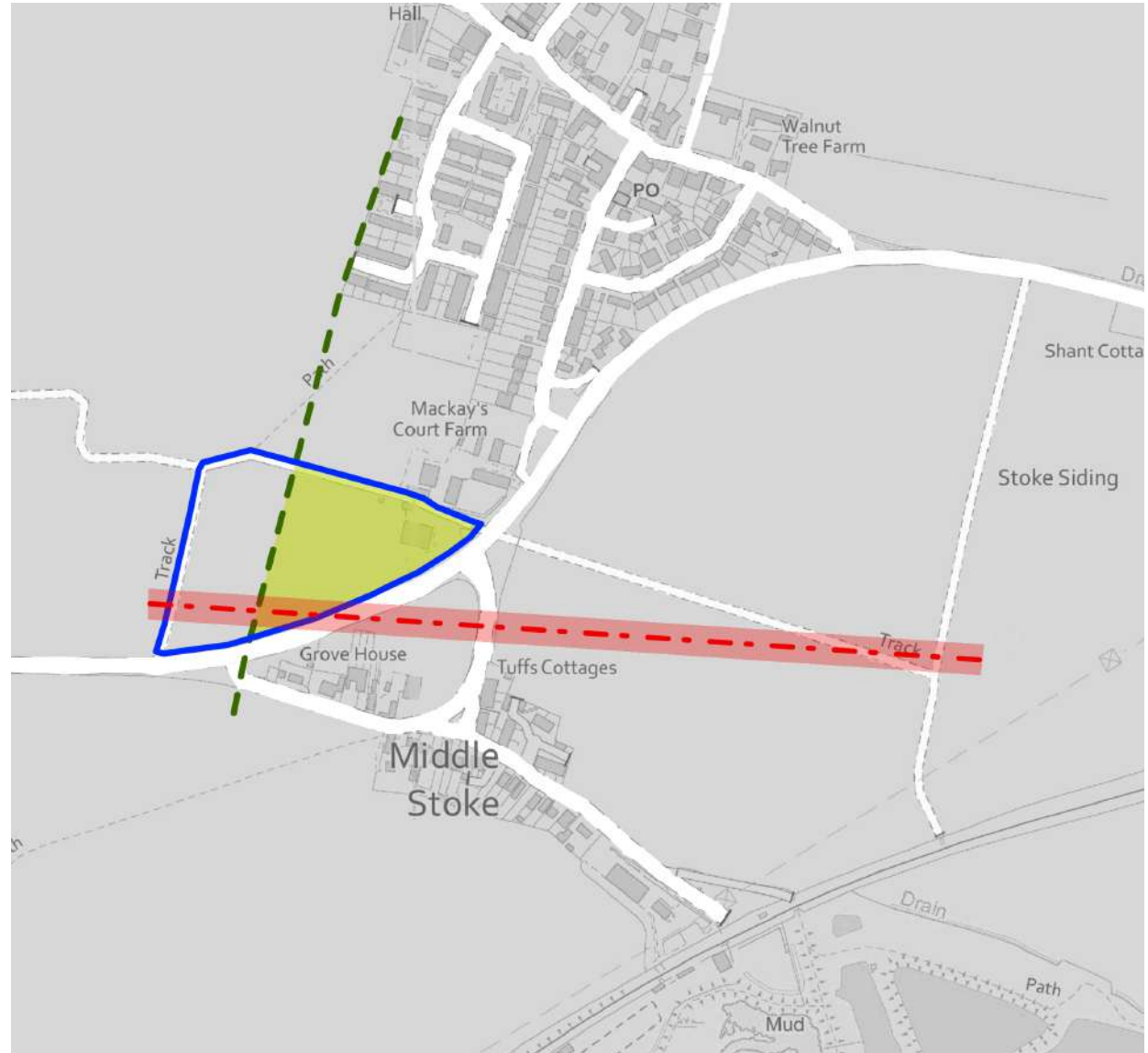
**Land North of the A228  
Grain Road  
Rochester**

Design Development Statement



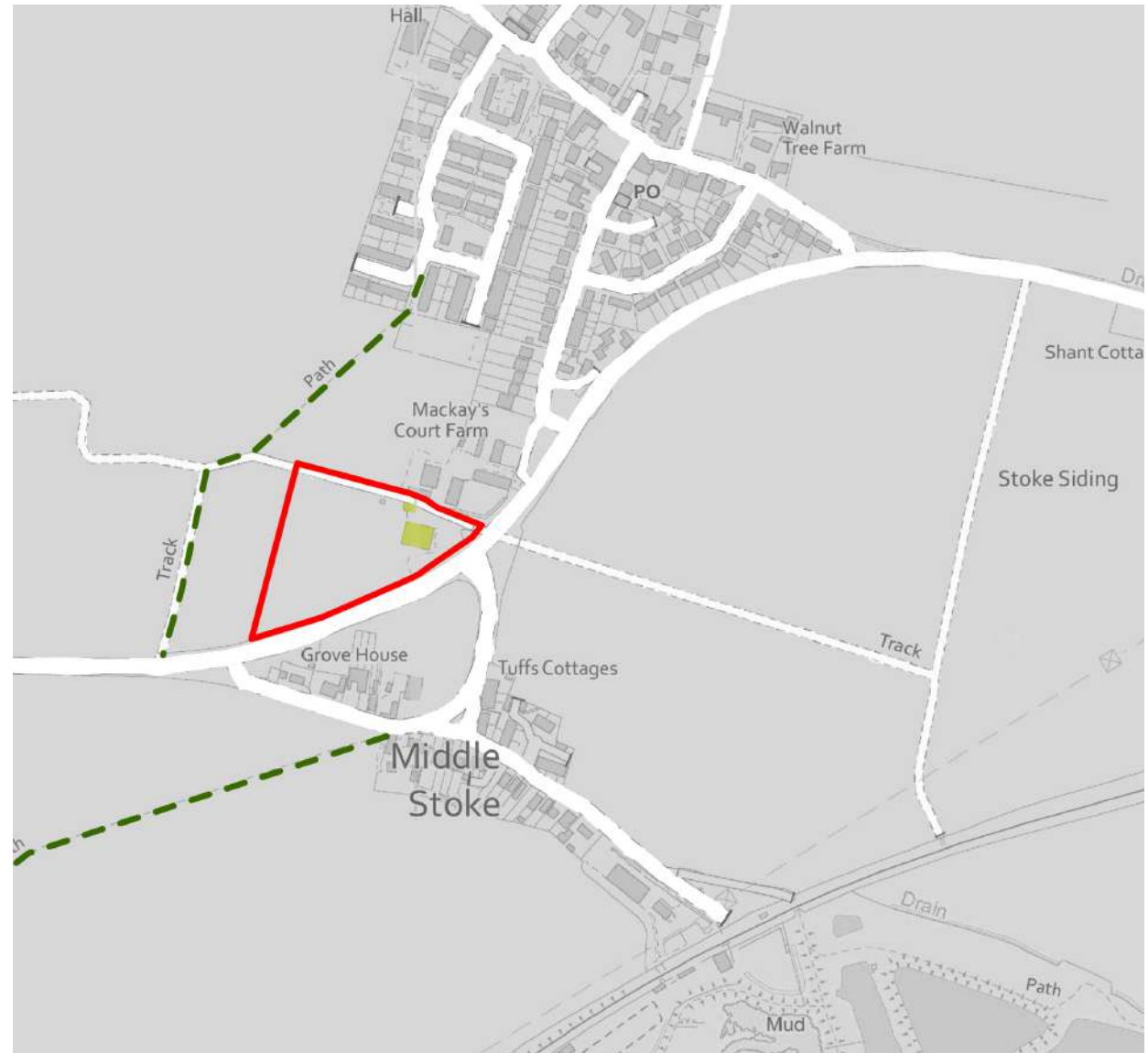
The proposed development site is situated adjacent to existing agricultural buildings. Sited north of Grain Road (A228) between the bypass and the existing residential development to the north, the natural urban grain line creates a logical infill site for an expansion of residential development. Following this line will keep all development within the residential confines and enable a landscaping buffer to be created to the west to seamlessly integrate the scheme into the surrounding countryside.

The existing High Pressure Gas Main running through the south of the site. This forms a clear constraint on the site as shown on the diagram. The approximate location has been highlighted with a 10m easement on each side of the Gas Main. This location provides the opportunity to buffer the proposed development to the south, creating a separation from Grain road for the improved design quality of the residential units.



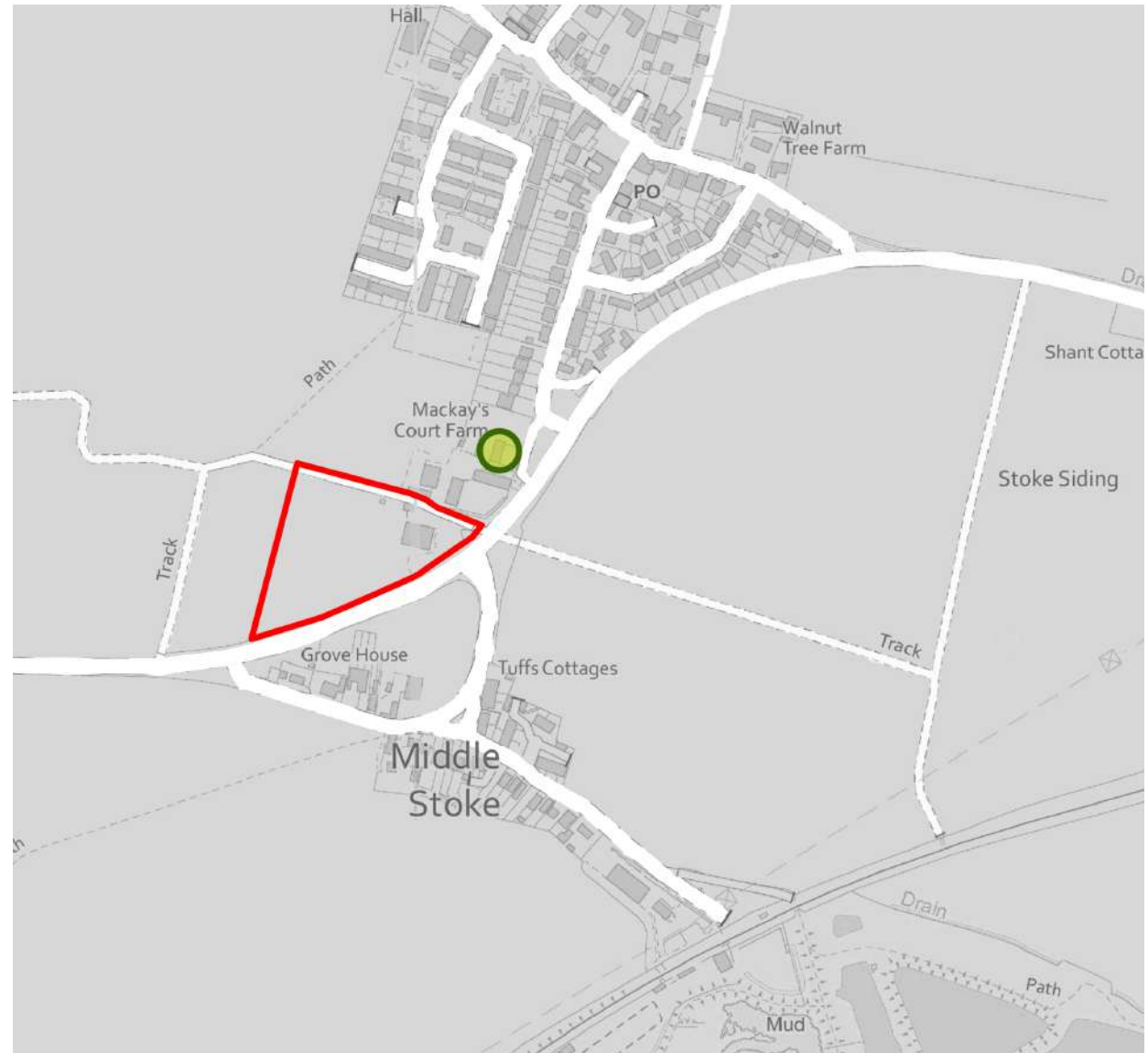
Located on the site are agricultural buildings capable of conversion under Class Q. However, the existing built form here would be replaced to ensure best use of the site and improve the view out to the countryside beyond. Making a better use of this area would benefit the local community, providing further housing and an overall betterment in the quality of design for the area.

Further to this, existing public right of way's run adjacent to the site. These routes further define the boundaries of the proposal, allowing the design to be led by visual impact. Clear and logical design moves can be taken to improve these connections, whilst creating buffer zones for the enjoyment of both the residents and pedestrians.



To the North of the site sits Mackay's Court, a Grade II Listed Farmhouse. The building is well screened from the site to the south by the existing farm yard. The external features of the property, including its Sash windows and brick facade, would likely create opportunities within the design of the proposed development to enhance this setting and provide a betterment to the historic importance of such dwellings in the area.

Further design consideration can be given to the proposed units by using the formal agricultural yard area to inform the layout and external detailing. This will in turn enhance the setting of the listed building by creating an improved yard-like development around the listed farmhouse.











Using the constraints and opportunities of the site, a clear and logical development can be considered. Using the existing access allows the development to integrate well into the current built environment. This access then creates a natural buffer to the north between the development and agricultural yard, improving the quality of the residential units on site.

A Green Infrastructure Corridor Can be created to link up with neighbouring sites. This will both increase site permeability, improving views through the area, and create a further buffer from the road to the south. Landscaping areas will be created to the west, forming usable areas for residents and users of the public right of way. These will also form a natural integration into the surrounding landscape.

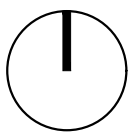
Overall the design of the development would provide a considered and logical solution to enhance the development of the area improving the surrounding existing residential development and providing well located homes.

#### Key

	Residential
	On Site Green Space
	Green Infrastructure Corridor
	Buffer Strip
	Access
	Primary Street







3483.dwg  
OS LICENCE NO: 100102432  
Contractor must verify all dimensions on site prior to commencement of works. DO NOT scale from this drawing. FOR PLANNING PURPOSES ONLY. Drawing to be read in accordance with other relevant documentation. It is the responsibility of the client/developer to ensure a suitably qualified specialist to confirm with the requirements of the current CDM 2015 Regulations. Client/developer to appoint a principal designer/contractor as required under the HSE legal requirements. Refer to www.hse.gov.uk for further guidance. © Drawings and designs are copyright of Bloomfields and must not be copied without prior consent.

Notes:

Key:

- Residential Area
- Commercial Area
- On Site Green Space
- Play Area
- Green Infrastructure Corridor
- Buffer Strip
- Access
- Potential Access
- Primary Street

Issued for Review and Comment

Revision:	Rev By:	Checked By:
A. 11.08.2025	RB	TWO



Client:  
Mr R Castle

Project:  
Site Development

Site Address:  
Land at Middle Stoke  
Grain Road  
Rochester

Scale:  
1:1250@ A1

Drawn By:  
RB

Date:  
11.08.2025

Checked By:  
TWO

Drawing Title:  
Development Layout

St: | Job No: | Drawing No: | Rev:

/ .3483.080.A





Homes England Local Plan Representation

---

## **CHATTENDEN BARRACKS – HHH3**

Medway Council Local Plan Regulation 19  
Consultation



## Homes England Local Plan Representation

---

### **CHATTENDEN BARRACKS - HHH3**

Medway Council Local Plan Regulation 19 Consultation

#### **LOCAL PLAN REPRESENTATIONS - PUBLIC**

**DATE: AUGUST 2025**

WSP

WSP House  
70 Chancery Lane  
London  
WC2A 1AF

Phone: [REDACTED]

WSP.com

---

# CONTENTS

---

<b>1</b>	<b>PREFACE</b>	<b>3</b>
<b>2</b>	<b>INTRODUCTION</b>	<b>4</b>
2.2	PLAN SOUNDNESS	4
2.3	STRATEGIC OPPORTUNITY	4
2.4	HOMES ENGLAND'S COMMITMENT	5
2.5	PREVIOUS INCLUSION	5
2.6	REPRESENTATION STRUCTURE	6
<b>3</b>	<b>SITE CONTEXT AND CHANGES SINCE REGULATION 18B</b>	<b>7</b>
3.1	SITE CONTEXT	7
3.2	BROWNFIELD STATUS	7
3.3	STRATEGIC LOCATION	8
3.4	SCHEME PROGRESSION	8
<b>4</b>	<b>EVIDENCE BASE REVIEW</b>	<b>11</b>
4.2	MEDWAY LOCAL PLAN SUSTAINABILITY APPRAISAL	11
4.3	STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT	12
4.4	LOCAL PLAN VIABILITY ASSESSMENT	12
4.5	INFRASTRUCTURE DELIVERY PLAN	13
4.6	INTERIM HABITATS REGULATIONS ASSESSMENT	13
4.7	STRATEGIC TRANSPORT ASSESSMENT	14
4.8	LOCAL HOUSING NEEDS ASSESSMENT	14
4.9	VILLAGE INFRASTRUCTURE AUDIT	15
4.10	CONCLUSION	15
<b>5</b>	<b>REVIEW OF REGULATION 19 HOUSING NUMBERS</b>	<b>16</b>

---

5.2	BUFFER AMOUNT	16
5.3	DELIVERY RISKS	16
5.4	INCLUSION OF CHATTENDEN BARRACKS	17
<b>6</b>	<b>HOMES ENGLAND'S ECOLOGICAL STRATEGY</b>	<b>19</b>
6.2	CHATTENDEN BARRACKS ECOLOGY BASELINE	19
6.3	HOMES ENGLAND'S EXISTING ECOLOGICAL WORK	20
6.4	ECOLOGICAL ENGAGEMENT SUMMARY	20
6.5	MITIGATION AND COMPENSATION STRATEGY	21
6.6	WIDER STRATEGIC OPPORTUNITIES	23
6.7	SUMMARY OF COMPARATIVE ASSESSMENT	24
<b>7</b>	<b>SOUNDNESS TEST AND RECOMMENDATION</b>	<b>25</b>
<b>8</b>	<b>APPENDIX</b>	<b>27</b>
8.1	APPENDIX 8.1 – SITE LOCATION PLAN	27
8.2	APPENDIX 8.2 – PDL STATUS OF CHATTENDEN BARRACKS	28
8.3	APPENDIX 8.3 – DRAFT FRAMEWORK MASTERPLAN	42
8.4	APPENDIX 8.4 - EVIDENCE BASE REVIEW	43
8.5	APPENDIX 8.5 - HOMES ENGLANDS EXISTING ECOLOGICAL DATA	56
8.6	APPENDIX 8.6 – ECOLOGICAL ENGAGEMENT	59
8.7	APPENDIX 8.7 – COMPARATIVE SITE ANALYSIS	62

# 1 PREFACE

---

- 1.1.1. WSP UK Ltd (WSP) has been instructed by Homes England to submit Representations to the Regulation 19 Medway Local Plan and appendices in relation to its land at Chattenden Barracks and Lodge Hill Camp, Lodge Hill. Separate representations are made in relation to each of these two sites. This document relates to Chattenden Barracks, the recreation ground and land at Lodge Hill (north of the ex-military training area) all within Homes England's ownership and associated with the delivery of new homes.
- 1.1.2. Homes England is the Government's housing and regeneration agency. Its mission is to drive regeneration and housing delivery to create high-quality homes and thriving places. These objectives support greater social justice; the levelling up of communities across England and the creation of places people are proud to call their home. Homes England's mission is underpinned by a number of strategic objectives that are outlined in its Strategic Plan (2023 – 2028) (link: <https://www.gov.uk/government/publications/homes-england-strategic-plan-2023-to-2028>).
- 1.1.3. Homes England is the freehold owner of approximately 325 hectares of the Lodge Hill estate. The Plan attached in Appendix 8.1 illustrates the extent of their land holding as per the blue line, with the previously developed Chattenden Barracks site delineated by the red line. These representations seek to ensure that Homes England's land contributes positively to meeting Medway's development needs and to the vibrancy and success of the wider area. In line with Paragraph 124 of the NPPF (Chapter 11), the brownfield, previously developed nature of the site significantly enhances its suitability for redevelopment and supports the efficient use of land.
- 1.1.4. Chattenden Barracks being promoted by Homes England for a residential-led scheme. It was previously submitted to Medway Council's Call for Sites in February 2023 and included in the Land Availability Assessment in October 2023 (Ref: Chattenden Barracks – HHH3). Homes England has also engaged throughout the Local Plan preparation process, including at the Regulation 18b consultation stage in September 2024. Within previous Local Plan consultations, the site has been acknowledged as brownfield and has been recognised for its strategic development potential.

## 2 INTRODUCTION

---

- 2.1.1. Homes England remains supportive of Medway Council's ongoing progress with the Regulation 19 Local Plan and acknowledges its ambition to deliver over 24,000 new homes within the 15-year plan period to 2041. However, this representation will set out that the omission of Chattenden Barracks (Site Ref: HHH3) currently makes the Plan unsound. This representation will demonstrate how the inclusion of Chattenden Barracks as an allocated site would significantly enhance the Plan's robustness and make the Plan sound, particularly in meeting objectively assessed housing needs and delivering a plan-led approach to growth.
- 2.1.2. Homes England notes and supports the Council's stated commitment to a 'brownfield first' strategy, which prioritises the efficient reuse of previously developed land – consistent with Paragraph 124 of the NPPF. Within this context, Chattenden Barracks - a substantial and strategically located brownfield site - presents a clear opportunity to reinforce the Plan's core principles. Its inclusion would ensure the Plan's alignment with the NPPF, making it sound, effective, and justified.

## 2.2 PLAN SOUNDNESS

- 2.2.1. Homes England has reviewed the Regulation 19 Draft Local Plan and considers that the Plan, in its current form, is unsound. It fails to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), particularly in relation to being positively prepared, justified, and effective. The Plan seeks to deliver 24,540 homes over the plan period through a blended growth strategy that prioritises brownfield land. However, it proposes a housing buffer of just 203 dwellings - less than 1%, which is extraordinarily tight and provides no meaningful contingency for under-delivery. The Plan is also heavily reliant on the delivery of complex and back-loaded strategic sites.
- 2.2.2. Despite this, the Plan omits Chattenden Barracks, a large, previously developed site in public ownership with a clear delivery trajectory. This omission undermines the robustness of the housing strategy and the credibility of the Plan's spatial approach. By allocating Chattenden Barracks, the Council would significantly improve the Plan's security in delivering its objectively assessed housing need. Homes England therefore strongly recommends that Chattenden Barracks be allocated within the Local Plan to make it sound and ensure that housing needs are met in full. As it stands, Homes England does not consider the Local Plan to be 'Sound'.

## 2.3 STRATEGIC OPPORTUNITY

- 2.3.1. Chattenden Barracks extends to approximately 25 hectares and represents a significant brownfield opportunity within the Hoo Peninsula. Located at the heart of Chattenden, its redevelopment offers the potential to deliver a high-quality, sustainable, and well-connected new community. Beyond housing delivery, the site offers tangible benefits to the existing community, including improved connectivity, infrastructure and services which will revitalise a site which was formerly at the heart of the Chattenden community.
- 2.3.2. A strategic allocation at Chattenden Barracks would accord with the Strategic Objectives of the Regulation 19 Local Plan (Section 2.2), which seek to:
- Secure the high-quality natural environment for future generations.
  - Provide homes of varying types and tenures to meet demand in Medway in a sustainable manner.
  - Reduce inequalities in health and provide better outcomes for residents.
  - Strengthen the role of village centres through the provision of retail.

- Ensure housing and economic needs are met in full, supported by appropriate green and blue infrastructure.
- Secure the benefits of Medway's regeneration, making best use of brownfield land.

2.3.3. The site is Previously Developed Land (PDL), located within the Hoo Peninsula growth area, and has been subject to extensive technical work and engagement. In the interests of good and proper planning, the site should be allocated as it can deliver sustainable outcomes that align with the Strategic Objectives of the Local Plan. Leaving the site unallocated risks perpetuating uncertainty and represents a missed opportunity.

2.3.4. Parts of Homes England's broader landholding at Lodge Hill presents a unique opportunity to deliver ecological compensation for the Chattenden Barracks development in addition to on-site imbedded mitigation. In addition, this land may have the potential to support wider ecological objectives within Medway.

## **2.4 HOMES ENGLAND'S COMMITMENT**

2.4.1. As the primary landowner of Chattenden Barracks and the wider Lodge Hill estate, Homes England is well positioned to enable the delivery of this site early in the plan period. This direct control provides confidence in the site's deliverability, an essential test of soundness under the NPPF. In addition, Homes England's active commitment is underscored by a focus on securing exemplary design principles, high-quality placemaking, and robust environmental stewardship throughout the development process.

2.4.2. As communicated to Medway Council since Homes England's representations on the Regulation 18b Draft Plan, significant progress has been made towards achieving the delivery of new homes on this site. Extensive engagement with a variety of key stakeholders, including statutory bodies and the local community (as evidenced by recent public engagement events held in February and July 2025, the submission of an EIA Scoping Report, and a Planning Performance Agreement with Medway Council setting out key submission and determination timescales over the coming months), shows increasing support for the development and a willingness to resolve key issues previously identified. This proactive work, coupled with Homes England's strategic role as the government's housing and regeneration agency, demonstrates a clear, viable, and robust delivery programme for Chattenden Barracks, further solidifying the case for its inclusion as an allocation within the Local Plan.

## **2.5 PREVIOUS INCLUSION**

2.5.1. It is noted that Chattenden Barracks (identified as Site HHH3 in previous iterations of the draft Local Plan) was initially included in two of the preferred growth options for the Regulation 18b spatial strategy. Its subsequent omission from the current Regulation 19 Draft Plan, attributed to "uncertainty surrounding the potential ecological impact," (as stated in the 2025 Local Plan Sustainability Appraisal Volume 3, Appendix J.1, p. 550) is therefore considered to render the Plan unsound.

2.5.2. This representation sets out how those ecological concerns have been robustly addressed through the development of a Masterplan for the site, supporting detailed technical work, stakeholder engagement, and an appropriate and comprehensive mitigation and compensation strategy.

2.5.3. Our representations will also highlight the inconsistencies in approach in how Chattenden Barracks has been considered in the Draft Plan compared to the allocation of other residential led sites in the vicinity.



## 2.6 REPRESENTATION STRUCTURE

2.6.1. This Representation is structured as follows to robustly demonstrate the soundness of allocating Chattenden Barracks:

- **3.0 Site Context and Updates:** Detailed overview of the site, its brownfield credentials, and significant progress made since the Regulation 18b Consultation.
- **4.0 Evidence Base Review:** Review and analysis of key Evidence Base Documents to inform the subsequent sections.
- **5.0 Contribution to Overall Housing Numbers and Plan Soundness:** Analysis of how Chattenden Barracks contributes to Medway's housing needs and addresses the soundness tests.
- **6.0 Ecological Progress and Mitigation / Compensation Strategy:** Comprehensive outline of technical studies, stakeholder engagement, and the robust mitigation and compensation framework developed to address environmental concerns.
- **7.0 Summary of Findings and Soundness Test Conclusion:** A concluding argument reiterating why the Local Plan would be unsound without the allocation of Chattenden Barracks and how its inclusion enhances the Plan's overall conformity with national policy.
- **8.0 Appendix:** Additional supporting information, technical reports, and correspondence with key stakeholders.

## **3 SITE CONTEXT AND CHANGES SINCE REGULATION 18B**

---

### **3.1 SITE CONTEXT**

- 3.1.1. Homes England, as the government's housing and regeneration agency and the primary landowner, recognises Chattenden Barracks as a significant opportunity in Medway to deliver much-needed new homes on a brownfield site within the Hoo Peninsula. Their proactive involvement since taking ownership of the site in 2018 is driven by a commitment to contribute significantly to Medway's housing provision whilst simultaneously facilitating exemplary design, enhancing local amenities, and to ensure the long-term resilience of the notified features of the Chattenden Woods and Lodge Hill Site of Special Scientific Interest (CWLH SSSI).
- 3.1.2. The Chattenden Barracks site is strategically located between Lochat Road to the south and west, Kitchener Road to the south, and Chattenden Lane to the east. The identified site area encompasses approximately 25.34 hectares (including a small, linked area of hardstanding southwest of Lochat Road and the former Recreation Ground north of Chattenden Estate). This land constitutes the former Chattenden Barracks, a military installation occupied from the 1870s until the 1990s, following which most buildings (with the exception of two of small existing structures) were systematically removed. Appendix 8.1 provides a plan showing a red line around the Chattenden Barracks site and a blue line around Homes England wider ownership and control.
- 3.1.3. The proposed scheme, which Homes England is actively progressing, is for a high-quality, residential-led development of up to 450 dwellings with a convenience retail unit to serve the wider locality. This development will integrate sensitively into Chattenden Village, creating new pedestrian and cycle connections, providing / enhancing vital new public open spaces, provision to revitalise the northern Chattenden Recreation Ground and achieving biodiversity net gain (BNG).

### **3.2 BROWNFIELD STATUS**

- 3.2.1. Homes England's strong support for the allocation of Chattenden Barracks is on the basis of its status as a substantial area of Previously Developed Land (PDL), consistent with the definition set out in Annex 2 of the National Planning Policy Framework (NPPF). Paragraph 125 of the NPPF gives substantial weight to the utilisation of brownfield land for settlements for homes, while Paragraph 147 encourages local planning authorities to prioritise brownfield land for development, particularly where it is well-located and can make efficient use of existing infrastructure.
- 3.2.2. Chattenden Barracks is a legacy military site with a long history of lawful development and occupation. While some areas within the wider curtilage, such as Rams Bottom Wood and the Chattenden Sports Field, are not PDL, Homes England's proposals adopt a landscape-led approach that focuses development on areas of PDL.
- 3.2.3. The allocation of Chattenden Barracks as a PDL site offers significant strategic benefits for Medway Council to align with their Brownfield-first approach set out the Spatial Objectives. The NPPF urges LPAs to make efficient use of land by prioritising development of brownfield sites. Therefore, an allocation would directly align with national planning objectives and the principles of sustainable development. This approach minimises the need to release greenfield sites, thereby conserving valuable open spaces and agricultural land. Furthermore, leveraging a site with a history of development allows for the optimisation of existing infrastructure, potentially reducing the overall burden on public funds by integrating new development with established networks. This site also

presents a unique opportunity to transform a site with a legacy of former military use into a vibrant, well-planned new community, fostering positive social value and economic outcomes.

- 3.2.4. Homes England considers that the continued vacancy of this strategically located brownfield site represents a missed opportunity and undermines the efficient use of land. A more detailed assessment of the site's PDL credentials, including historical mapping, infrastructure descriptions, and up-to-date site photos, is provided in Appendix 8.2.

### **3.3 STRATEGIC LOCATION**

- 3.3.1. In addition to its brownfield credentials, Chattenden Barracks occupies a strategically important location within the Hoo Peninsula growth area. Centrally positioned within the settlement of Chattenden, the site is well-placed to support the delivery of sustainable development and to act as a catalyst for wider regeneration across the Peninsula.
- 3.3.2. The site's location offers a unique opportunity to reinforce the spatial strategy of the Local Plan by delivering new homes in a location that is already served by infrastructure, is adjacent to existing residential areas, and is capable of supporting enhanced connectivity. Its redevelopment would help consolidate the village of Chattenden, transforming a long-vacant and underutilised site into a vibrant, integrated part of the community.
- 3.3.3. Importantly, the site's proximity to other strategic allocations, including HHH6 (Land at Chattenden East), creates opportunities for coordinated infrastructure delivery, including active travel links, green infrastructure and retail provision. Chattenden Barracks will support the delivery of the wider growth vision for the Peninsula, including early contributions towards the Infrastructure Delivery Plan (IDP).
- 3.3.4. Allocating Chattenden Barracks would not only contribute to meeting Medway's housing needs but would also strengthen the spatial coherence of the Local Plan by focusing growth in a location that aligns with the Council's 'brownfield first' strategy, provides a landscape-led development and supports the delivery of a more connected and cohesive settlement pattern in Chattenden. This ensures that the Council is meeting the legal requirements of Section 39(2) of the Planning and Compulsory Purchase Act 2004 to exercise its plan making function with the objective of contributing to the achievement of sustainable development. It also directly supports the principles of Paragraph 15 of the NPPF which requires plan-makers to positively plan for the future of the area. This is further emphasised by Paragraphs 125c and 147a which both prioritise the release of brownfield sites.
- 3.3.5. Leaving the site unallocated risks perpetuating uncertainty and underutilisation, along with limiting the ability to provide a coordinated approach to the wider Lodge Hill site as part of environmental improvements across the Hoo Peninsula. In the interests of good and proper planning, the Council should take the opportunity to allocate the site and provide a clear, plan-led framework for its redevelopment. This would ensure that the site's potential is realised in a coordinated and sustainable manner, and that its contribution to housing, infrastructure, and environmental objectives is fully captured. Failure to allocate the site leaves a policy gap and misses the opportunity to promote a legacy brownfield site through the plan-making process.

### **3.4 SCHEME PROGRESSION**

- 3.4.1. Since the submission of the Regulation 18b Representations, Homes England has undertaken substantial and proactive work to advance the proposals for the Chattenden Barracks Site, demonstrating a clear commitment to its delivery as a well-designed, viable and deliverable development that contributes to the wider Hoo Peninsula objectives.

## EMERGING MASTERPLAN

- 3.4.2. An iterative and detailed Masterplan for Chattenden Barracks has been developed, shaped by continuous engagement with various stakeholders and adapting to key considerations (Appendix 8.3). This current draft Masterplan, along with the detailed design strategies that inform it, will serve as the basis for an Outline Planning Application (OPA) that Homes England is seeking to submit in Q3 2025. This significant progress underscores Homes England's commitment to delivering a high-quality scheme. In addition to the Masterplan, Homes England has also been preparing a targeted mitigation and compensation strategy incorporating other land within their ownership at Lodge Hill. This is specifically intended to offset indirect and direct ecological impacts associated with the proposed development at Chattenden Barracks.

## ENGAGEMENT

- 3.4.3. In support of the emerging Masterplan, Homes England has undertaken extensive and proactive engagement with a wide range of key stakeholders to advance the proposals for Chattenden Barracks and address previously identified constraints. This engagement includes:
- **Natural England:** Homes England has entered into a formal Discretionary Advice Service (DAS) agreement with Natural England to collaboratively review and agree upon the basis for Homes England's ecological assessments and to discuss the strategic approach to the mitigation and compensation necessary for the Chattenden Woods and Lodge Hill SSSI. Both parties have signed a Joint Statement of Cooperation setting out an agreed approach, steps of engagement and responses to inform the development of the OPA and associated compensation measures. This demonstrates a proactive and responsible approach to tackling the environmental challenges noted by the Council and their advisors in the Sustainability Appraisal (SA) and helps to justify the inclusion of Chattenden Barracks as an allocation within the Local Plan.
  - **Public Engagement Events (& online engagement):** Four public engagement events held to gather community feedback and present emerging Masterplan proposals (as referenced in the Introduction), in February and July 2025. Feedback was gathered in-person and through a digital engagement platform and is being used to inform the preparation of the OPA.
  - **Pre-application Engagement with Medway Council:** Significant engagement has been undertaken with Medway Council through a Planning Performance Agreement (PPA). This has involved meetings with officers as well as technical consultees on key issues (including Open Spaces, Arboriculture, Public Rights of Way and Transport). In addition, there have been two design-specific workshops with the Council to discuss the Design Code and Homes England's approach to securing high-quality placemaking.
  - **Design Review Panel (DRP) with Design South East (June 2025):** Constructive engagement with independent design experts to ensure high-quality design principles are embedded from the outset. The scheme was well-received, and the design team has taken on several of the communicated recommendations. In addition, a baseline Building for Healthy Life (BHL) assessment was undertaken to aid Homes England's pre-disposal process.
  - **Meetings with Key Stakeholders:** Regular and productive meetings with statutory bodies and local interest groups, including the RSPB, and the Highways Authority, to address specific concerns and ensure a holistic approach to development that addresses key issues.
- 3.4.4. This extensive and ongoing engagement has been instrumental in informing and refining the proposals, leading to the progression of a detailed Masterplan for the site that integrates stakeholder feedback.

## **DELIVERY PROGRAMME**

- 3.4.5. Homes England is committed to submitting an Outline Planning Application in Q3 2025, which will enable delivery of the site within the first five years of the plan. This programme, underpinned by Homes England's direct ownership, strategic resources, and proven delivery track record, confirms the deliverability of Chattenden Barracks as a significant housing site. It will make an early and sustained contribution to Medway's housing supply, providing certainty and resilience to the Local Plan's housing trajectory.

## 4 EVIDENCE BASE REVIEW

---

- 4.1.1. This section provides a focused review of the Regulation 19 Local Plan's supporting evidence base, with specific reference to how each document relates to Chattenden Barracks and the wider Lodge Hill estate. The purpose is to identify areas where the evidence base lacks consistency, fails to reflect updated technical work, or does not adequately support the Plan's soundness.
- 4.1.2. Homes England has undertaken a comprehensive review of the evidence base and engaged extensively with Medway Council throughout the plan-making process. While the documents collectively aim to support the spatial strategy and site allocations, there are notable gaps and inconsistencies in how Chattenden Barracks has been assessed. These issues are particularly concerning given the site's strategic potential, public ownership, and alignment with the Council's stated brownfield-first approach.
- 4.1.3. To ensure clarity, this section provides a summary of Homes England's key comments on each relevant evidence base document. These summaries focus on the implications for soundness and highlight where inconsistencies or omissions have materially affected the treatment of Chattenden Barracks. A full technical review, including detailed commentary, comparative analysis, and supporting correspondence, is provided in Appendix 8.4.
- 4.1.4. Homes England is highly cognisant and aware of the Duty to Cooperate (DtC) and in the circumstances of the Medway Local Plan, it does not wish to comment or provide any preclusion on this at this stage.

### 4.2 MEDWAY LOCAL PLAN SUSTAINABILITY APPRAISAL

- 4.2.1. The Sustainability Appraisal (SA) is a statutory requirement that assesses the environmental, social, and economic impacts of the Local Plan and its reasonable alternatives. Chattenden Barracks (HHH3) was identified as a reasonable alternative at Regulation 18b and scored consistently across all 12 Plan Objectives in both Regulation 18b and 19 post-mitigation scenarios. Despite this, the site was omitted from the Regulation 19 allocations due to "uncertainty regarding ecological impact."
- 4.2.2. Homes England contends that this rationale is now outdated and has provided additional ecological evidence in Section 6 of this representation. This work has led to the formulation of a robust ecological mitigation and compensation strategy which deals with the impacts arising from developing Chattenden Barracks.
- 4.2.3. The SA also applies inconsistent scoring when compared to nearby allocated sites such as HHH6 (Land East of Chattenden), which is within 400m of the SSSI but assessed as having only minor ecological impacts. Chattenden Barracks, a brownfield site with stronger performance in landscape, flooding, and pollution categories, was assessed more negatively despite its alignment with the Council's brownfield-first strategy.
- 4.2.4. The Sustainability Appraisal does not provide a robust or up-to-date justification for the exclusion of Chattenden Barracks as an allocated site within the Local Plan. The site was previously identified as a reasonable alternative and scored consistently across both Regulation 18b and 19 assessments. The cited ecological concerns have since been addressed through detailed technical work and formal engagement with Natural England (as discussed in detail below). The SA's capacity figure is also inconsistent with the site's scale and delivery potential.

- 4.2.5. Homes England considers that the SA should be updated to reflect the current evidence base and evidence made available to the Council at both Regulation 18 stage and subsequent engagement and pre-application engagement – and that Chattenden Barracks should be reinstated as a strategic allocation. This would ensure consistency, transparency, and alignment with the relevant NPPF tests.

### **4.3 STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT**

- 4.3.1. The SHLAA (June 2025) identifies Chattenden Barracks as a large, previously developed site and confirms it is available for development. It was included as a preferred site at Regulation 18b with a desktop yield of 447 dwellings. However, in the Regulation 19 Draft Plan, the site is deemed “not suitable” and “not achievable,” with no new evidence provided to justify this reversal.
- 4.3.2. This assessment contradicts the site’s known characteristics, including its brownfield status, public ownership, and the significant technical and engagement work undertaken by Homes England. It also conflicts with the Sustainability Appraisal, which assigns a different capacity figure (400 dwellings) without explanation, highlighting inconsistencies across the evidence base.
- 4.3.3. Homes England has made demonstrable progress toward delivery, including a Masterplan, ecological strategy, and planning engagement. The SHLAA fails to reflect this, and its conclusions appear to be based on outdated or incomplete information.
- 4.3.4. Homes England therefore considers that the SHLAA should be updated to reflect the site’s deliverability and strategic value, and that Chattenden Barracks should be allocated within the Local Plan to support its soundness

### **4.4 LOCAL PLAN VIABILITY ASSESSMENT**

- 4.4.1. The LPVA assesses the financial deliverability of the Local Plan, including the cumulative impact of policy requirements such as affordable housing and infrastructure contributions. While Chattenden Barracks is acknowledged as a brownfield site, it was excluded from the viability modelling due to its omission from the proposed allocations.
- 4.4.2. For the Chattenden & Hoo St Werburgh Area, identified primarily for residential development, the Viability Assessment notes that there is a significant amount of infrastructure required (further detail available in the IDP). This is expected to be primarily paid for through Section 106 contributions, which total £35,238 per unit. This exceeds the next nearest totals for other Strategic Sites in the Draft Plan by over £9,000 (i.e. Rainham being £25,718 per unit) and compared to the Early Viability Assessment, this change results in a significant increase adding to the pressure of affordable housing delivery. The LPVA also notes that brownfield sites are expected to deliver lower levels of affordable housing due to remediation costs.
- 4.4.3. Homes England contends that the omission of Chattenden Barracks from the allocated sites undermines the Plan’s overall viability and its strategy for securing essential infrastructure, including both transport upgrades and environmental enhancements. Chattenden Barracks represents a unique opportunity as a large, deliverable brownfield site that is poised for early delivery within the plan period. The allocation of Chattenden Barracks also adds to the allocated housing supply, making a meaningful contribution to reducing the exceptionally high Section 106 burden placed on developments within the Chattenden and Hoo St Werburgh Strategic Sites.



- 4.4.4. The LPVA confirms that strategic sites were modelled individually where the delivery of the Plan relies on them. Given the scale, location, and public ownership of Chattenden Barracks, Homes England maintains that the site meets this threshold and should have been tested accordingly.

## **4.5 INFRASTRUCTURE DELIVERY PLAN**

- 4.5.1. The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements needed to support the growth proposed in the Local Plan. This includes identifying key projects, their estimated costs, funding sources, and delivery bodies. The IDP aims to demonstrate that the infrastructure required to make the Local Plan's growth deliverable is achievable, ensuring the overall soundness of the Plan.
- 4.5.2. The omission of Chattenden Barracks as an allocated site from the Local Plan presents a missed opportunity to account for early developer contributions (seen as a key contributor to the delivery of infrastructure) from a large, deliverable brownfield site. Incorporating Chattenden Barracks into the Local Plan would not require greater costs to infrastructure required to support it, would more accurately reflect the true scale of growth in Chattenden and ensure that infrastructure planning is aligned with the spatial strategy.
- 4.5.3. On transport, Chattenden Barracks offers an opportunity to contribute early to transport mitigation, including strategic junction upgrades. Its allocation would allow the site to be factored into the wider viability modelling and infrastructure cost assumptions, improving the overall viability of the area and helping to moderate Section 106 expectations across other sites. These contributions are vital to the timely inflow into Medway's pooled infrastructure fund and the delivery of critical infrastructure.
- 4.5.4. Homes England therefore recommends that Chattenden Barracks be allocated within the Local Plan to strengthen the IDP's infrastructure delivery strategy, ensure timely and coordinated investment, and support the soundness of the Plan.

## **4.6 INTERIM HABITATS REGULATIONS ASSESSMENT**

- 4.6.1. The Interim HRA assesses the potential impacts of the Local Plan on internationally and nationally designated ecological sites. The Hoo Peninsula is identified as an area of significant ecological sensitivity, supporting extensive protected habitats and rare species, including those for which the SPAs are designated. The Interim HRA identifies potential impact pathways from planned development and outlines the need for mitigation measures to avoid adverse effects. It also underpins the requirement for a Strategic Environmental Management Scheme (SEMS) to manage and offset these impacts.
- 4.6.2. Homes England is undertaking exploratory work relating to the future of land to the north of the Lodge Hill asset to ascertain what wider environmental benefit could be generated (beyond its statutory management obligations). Given the interim nature of the HRA and uncertainty in approach within the Plan, Homes England is not committing any land to SEMS at this stage. Further clarity is needed on what SEMS is seeking to achieve in the context of wider development on the Hoo Peninsula and how SEMS is being incorporated within a longer term (implementable) Hoo Peninsula Environmental Framework.
- 4.6.3. Homes England also questions why Lodge Hill is currently shown as an area of 'Proposed Open Space' on the Hoo St Werburgh Concept Plan (Regulation 19 Local Plan – Figure 14) without any explanation and/or policy justification for this. Homes England intends to comment further once the HRA is updated and discussions with Medway Council and Natural England progress.



## **4.7 STRATEGIC TRANSPORT ASSESSMENT**

- 4.7.1. The STA evaluates the impact of proposed growth on Medway's transport network and identifies mitigation measures to support sustainable movement. Chattenden Barracks was included in earlier modelling at Regulation 18 but was excluded from the Regulation 19 Forecasting Report and Proportionality Assessment. This omission is important as it demonstrates that within the previous iteration of the Plan development could come forward at Chattenden Barracks alongside others in the Hoo Peninsula. This confirms that the additional infrastructure requirements arising from Chattenden Barracks is negligible and that the allocation of the site will support this delivery.
- 4.7.2. This omission means that the site's potential trip generation, mitigation needs, and contribution to strategic transport infrastructure have not been assessed. Given the site's scale and strategic location, this creates a gap in the evidence base and particularly risks underestimating funding opportunities associated with the site.
- 4.7.3. The site aligns with the preferred "vision-led" mitigation strategy for the Hoo Peninsula, which includes Bus Rapid Transit (BRT), Local Cycling and Walking Infrastructure Plans (LCWIP), and internalisation strategies. Homes England's Masterplan supports these objectives and includes design features to reduce car dependency and encourage active travel.
- 4.7.4. Homes England recommends that Chattenden Barracks be reintroduced into the transport modelling and proportionality assessments to ensure that its potential contributions to strategic infrastructure are fully captured. This would improve the robustness of the transport evidence base and support the soundness of the Local Plan under the NPPF tests of being justified, effective, and positively prepared.

## **4.8 LOCAL HOUSING NEEDS ASSESSMENT**

- 4.8.1. The Local Housing Needs Assessment (LHNA) 2025 provides a detailed analysis of demographic trends, household projections, and housing market dynamics to determine the scale and type of housing needed across the council area. The LHNA (Ref: Section 8 – Conclusions and Summary) identifies a number of critical housing needs across Medway, including:
- A significant shortfall in affordable housing, with a need for approximately 400 affordable homes per year;
  - A requirement for a diverse housing mix, including family-sized homes, smaller units for downsizers, and accessible homes for older people and those with disabilities;
  - A growing need for specialist housing, including supported accommodation and housing for older persons; and
  - A need to support self-build and custom-build housing, in line with national policy.
- 4.8.2. Chattenden Barracks is well-positioned to help meet these needs. Chattenden Barracks is capable of delivering up to 450 new homes with the appropriate amount of affordable housing and mix of units. As a Homes England-led scheme, the site also offers the potential for a variety of delivery models.
- 4.8.3. The omission of Chattenden Barracks from the Local Plan therefore represents a missed opportunity to deliver a significant quantum of housing that directly aligns with the identified needs in the LHNA. Its inclusion as an allocated site would strengthen the Local Plan's ability to meet the NPPF tests of being positively prepared and effective, particularly in relation to affordable housing delivery and housing mix.

## **4.9 VILLAGE INFRASTRUCTURE AUDIT**

- 4.9.1. The Village Infrastructure Audit (VIA) assesses the availability and condition of infrastructure across Medway's rural settlements. It identifies clear deficits in Chattenden, including limited access to healthcare, public transport, and local retail. These gaps are particularly significant given the scale of planned growth across the Hoo Peninsula.
- 4.9.2. Homes England welcomes the Local Plan's recognition of these challenges and recognises that the proposed allocation of HHH6 (Land at Chattenden East) includes provision for a new retail hub. While HHH3 (Chattenden Barracks) is not the designated location for the retail hub, Homes England's proposals are to include a small convenience retail unit. This is intended to complement the wider retail strategy and provide early access to local services for new and existing residents. The delivery of this unit aligns with the Local Plan's spatial strategy and supports the principle of walkable, mixed-use neighbourhoods.
- 4.9.3. More broadly, the VIA reinforces the case for allocating Chattenden Barracks as a strategic site. The site is well-positioned to contribute to the delivery of infrastructure identified in the audit. It would also help to address long-standing infrastructure deficits in Chattenden, support the delivery and future vitality of the proposed retail hub at HHH6, and contribute to a more balanced and sustainable settlement pattern across the peninsula.

## **4.10 CONCLUSION**

- 4.10.1. The detailed review of Medway Council's evidence base documents (Appendix 8.4) reflects a consistent omission of Chattenden Barracks from key assessments, despite its suitability, availability, and strategic site potential. Across the documents, the site is either excluded from modelling or underrepresented in terms of its contribution to housing delivery, infrastructure funding, and environmental mitigation.
- 4.10.2. This disconnect between the evidence base and the spatial strategy undermines the robustness of the Local Plan. Homes England considers that the allocation of Chattenden Barracks would resolve these inconsistencies, strengthen the evidence base, and support the delivery of a more resilient and sustainable growth strategy for the Hoo Peninsula.
- 4.10.3. Furthermore, there are clear inconsistencies across the evidence base regarding the capacity of Chattenden Barracks. The Sustainability Appraisal (SA) assigns an indicative capacity of 400 dwellings, without providing a clear evidential basis. The SHLAA presents a desktop yield of 447 dwellings, while the Regulation 18b consultation aligned with Homes England's promoted capacity of up to 500 dwellings. Homes England is now promoting a refined Masterplan for up to 450 dwellings, supported by detailed technical work. This variation in figures across key documents suggests a lack of coordination and rigour in the evidence base and evaluation. It also raises concerns about the transparency and robustness of the Plan's site selection methodology. A more thorough and consistent examination of the evidence is required to ensure that the Plan is sound, justified, and based on proportionate evidence.

## 5 REVIEW OF REGULATION 19 HOUSING NUMBERS

---

- 5.1.1. This section builds upon the preceding evidence base review by analysing the Local Plan's housing supply strategy. Drawing on the Land Availability Assessment (LAA), Local Housing Needs Assessment (LHNA), Infrastructure Delivery Plan (IDP), and the Sustainability Appraisal (SA), it demonstrates that the exclusion of Chattenden Barracks as an allocation introduces significant delivery risks and results in an insufficient housing buffer. This undermines the Plan's ability to meet the tests of soundness set out in paragraph 36 of the NPPF - particularly in terms of being "justified," "effective," and "positively prepared."
- 5.1.2. Homes England has a strategic role in supporting the Government with meeting its wider target of building new, affordable homes. On this basis, Homes England supports Medway Council's ambition to meet its full housing need and deliver sustainable growth. However, Homes England consider that the current housing supply strategy is overly reliant on a small number of complex or uncertain sites, and lacks the flexibility and resilience required to respond to delivery risks over the plan period. Homes England wish to support this process by advocating for the allocation of Chattenden Barracks within the Plan. The inclusion would significantly strengthen the Plan's housing trajectory, improve its robustness, and help ensure that housing needs are met in full.

### 5.2 BUFFER AMOUNT

- 5.2.1. The Regulation 19 Draft Local Plan sets a housing requirement of 24,540 dwellings over the 15-year plan period (2026–2041), based on the LNHA. Homes England supports the Council's ambition to meet this need in full. However, a detailed review of the housing supply components, as set out in the Land Availability Assessment (June 2025), reveals a critically low buffer.
- 5.2.2. When reviewing the full complement of housing supply (1,524 from large sites under construction, 128 homes from large permitted unallocated sites, 110 homes from small permitted sites, and a windfall allowance of 1,584 homes), the Plan delivers a surplus of just 203 dwellings above the minimum requirement. This equates to a buffer of less than 1%, which is significantly below the level typically expected to ensure flexibility and resilience in a Local Plan.
- 5.2.3. Homes England considers this minimal buffer to be fundamentally insufficient, rendering the Medway Local Plan unsound under the NPPF's tests of being "effective" and "justified". A sound and robust Local Plan, crucial for a plan-led system, should demonstrate a resilient and deliverable housing supply that provides adequate flexibility to account for the inevitable unforeseen delays, viability challenges, market fluctuations, or under-delivery from other allocations. A buffer of less than 1% provides no meaningful resilience against common planning and delivery risks, putting Medway's ability to meet its housing needs over the entire plan period at severe risk of failure.
- 5.2.4. In this context, the exclusion of a large, deliverable site such as Chattenden Barracks, which could contribute up to 450 homes, represents a missed opportunity to strengthen the Plan's resilience. Its inclusion would increase the buffer by nearly 2%, providing a more robust safeguard against delivery risk and helping to ensure that housing needs are met in full across the plan period.

### 5.3 DELIVERY RISKS

- 5.3.1. In addition to the insufficient buffer, the Regulation 19 Draft Local Plan relies on a significant proportion (87%) of its new housing being delivered through allocated sites. This number is high for an area like Medway which has struggled with delivery of housing in the past. In addition, several of these

allocations present elevated delivery risks. Homes England considers that these risks further undermine the robustness of the housing trajectory and reinforce the need for additional certainty through the inclusion of strategic, deliverable sites such as Chattenden Barracks.

- 5.3.2. Firstly, the Plan includes a windfall allowance of 1,584 homes over the plan period. While windfall development is a legitimate source of supply, the simultaneous allocation of numerous small sites - many of which would typically be considered windfall - raises concerns about potential double-counting. This could lead to an overestimation of deliverable supply and further erode the already minimal buffer. In addition, the windfall amount has been calculated based on previous delivery across Medway, which has been low for several years. If Chattenden Barracks is considered windfall, then it would take up a significant proportion of this allowance. Homes England deems this should be reserved for smaller sites, with a site the size of Chattenden Barracks requiring careful thought and planning through the Local Plan process.
- 5.3.3. Secondly, Policy SA12 groups together 23 small and dispersed sites, collectively targeting up to 881 dwellings. Many of these sites have low individual capacities, with several expected to deliver fewer than 10 homes. As highlighted in the LP Viability Assessment, smaller sites are often less viable, more prone to delivery delays, and more sensitive to market fluctuations. Their inclusion introduces considerable uncertainty into the housing trajectory, particularly in the early years of the plan.
- 5.3.4. Thirdly, Policy SA6 (Land West of Strood) represents a complex cross-boundary allocation involving Gravesham Borough Council. The site is expected to deliver up to 4,000 homes across both authorities with 1,280 homes in Medway during the plan period. However, the site includes Green Belt land, requires a landscape-led Masterplan, and depends on joint working between two authorities. A significant portion of the housing is back-loaded, with delivery expected toward the end of the plan period. Any delays in this site coming forward would have a disproportionate impact on Medway's housing supply. This further highlights the necessity to provide more allocations at the front end of the Plan period which Chattenden Barracks is able to deliver as illustrated throughout these representations.
- 5.3.5. These risks highlight the fragility of the current housing strategy. The omission of Chattenden Barracks removes a key opportunity to strengthen the trajectory and mitigate against under-delivery elsewhere. Its inclusion would provide early supply, reduce reliance on uncertain sites, and improve the overall resilience of the Plan.

## **5.4 INCLUSION OF CHATTENDEN BARRACKS**

- 5.4.1. The strategic allocation of Chattenden Barracks (Site HHH3), with a demonstrated capacity of up to 450 dwellings, would significantly strengthen the Local Plan's housing trajectory and improve its resilience. The site is PDL, in public ownership, and a case has been put forward as to why the site should be assessed as suitable, available and deliverable.
- 5.4.2. Homes England is uniquely positioned to unlock the site's potential. As the landowner, it is actively addressing key technical constraints, including land remediation and ecological sensitivities. A robust ecological strategy is being developed in consultation with Natural England and remediation plans are being reviewed to address historic contamination typical of former MoD land. These actions demonstrate a proactive and solution-focused approach to delivery.
- 5.4.3. The site's inclusion would directly support Medway Council's stated brownfield-first strategy, which aims to deliver 40% of new homes on previously developed land (Ref: Regulation 19 Local Plan, para

3.1.3). It also aligns with the principles of sustainable development set out in the NPPF, including efficient land use (paragraph 125c) and the prioritisation of sites with fewer constraints and greater certainty of delivery.

- 5.4.4. Therefore, Chattenden Barracks offers a number of strategic advantages over other allocations:
- It is capable of delivering early supply within the early portion of the plan period.
  - It can contribute to affordable housing delivery, supporting the LHNA's target of 400 affordable homes per year.
  - It supports a diverse housing mix, including family homes, accessible units, and self-build plots.
  - It is near to existing infrastructure, reducing the need for extensive upfront investment.
- 5.4.5. In contrast to other sites with greater complexity or uncertainty, Chattenden Barracks provides a high degree of delivery confidence. Its inclusion would help address the Plan's insufficient buffer, mitigate delivery risks, and ensure that housing needs are met in full. Homes England therefore recommends that the site be allocated within the Local Plan to support its soundness and effectiveness.

## 6 HOMES ENGLAND'S ECOLOGICAL STRATEGY

---

- 6.1.1. This section sets out Homes England's comprehensive ecological strategy for Chattenden Barracks, demonstrating how the site's development can deliver net environmental benefits and directly address the "uncertainty regarding ecological impacts" cited as the reason for its omission from the Regulation 19 Draft Local Plan.
- 6.1.2. A key consideration in Homes England's position is the reference to a 400-metre buffer around Sites of Special Scientific Interest (SSSIs) as a constraint to development at Chattenden Barracks. This distance-based approach is derived from guidance relating to European sites and is not a formal policy requirement for SSSIs under national planning policy. Homes England does not accept the application of an arbitrary 400m exclusion zone and instead advocates for a site-specific, evidence-led approach. The emerging ecological strategy, supported by detailed survey work, a formal DAS agreement with Natural England, and constructive engagement with stakeholders, demonstrates that potential impacts can be robustly mitigated. This pragmatic and proportionate approach provides a credible basis for the allocation and supports the soundness of the Plan.
- 6.1.3. This approach aligns with the ecological impact hierarchy set out in Paragraph 193 of the National Planning Policy Framework (NPPF), stating:

*When determining planning applications, local planning authorities should apply the following principles:*

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*

- 6.1.4. Homes England can demonstrate that through its approach to maintaining the favourable conservation status of the Chattenden Woods & Lodge Hill SSSI, extensive ecological survey work (and commitment to future surveys), targeted (evidence-led) approach to on-site embedded mitigation and compensation, it is demonstrated that Homes England have a robust approach to addressing acknowledged direct and indirect impacts to justify a site allocation for Chattenden Barracks. Additionally, the delivery of new homes at Chattenden Barracks can also act as a conduit to the continued consideration of Homes England's wider landholding in contributing to the Kent and Medway LNRS and the emerging (although not yet clear) SEMS strategy that the Plan seeks to develop in the Hoo Peninsula.

## 6.2 CHATTENDEN BARRACKS ECOLOGY BASELINE

- 6.2.1. Homes England has undertaken several surveys in order to understand the ecological status of Chattenden Barracks. These surveys have helped to form a baseline summary of the site and inform the approach to mitigation and compensation.



- 6.2.2. A UK Habitat Classification (UKHab) survey of Chattenden Barracks identified coverage of primarily sealed surface (hardstanding) and artificial unvegetated (unsealed surface) throughout the site of generally negligible value to wildlife. Some smaller areas have clear similarities a priority 'open mosaic' habitat, but the extent is too small to qualify as a priority habitat. Neutral Grassland and Broadleaved Woodland are also present within the Site.
- 6.2.3. Bat surveys undertaken on site in 2024 identified three species (common pipistrelle, soprano pipistrelle and noctule) during manual transect surveys with a further two bats belonging to a species groups (Pipistrellus and Myotis species). High quality foraging and commuting habitat for bats is present across the site, within areas of woodland, scrub and grassland. Earlier bat surveys undertaken in 2016, 2017 and 2021 report that Upchat Road bridge is likely to provide a link on a landscape level between habitats north of site to Four Elms Hill dual.
- 6.2.4. The following reptile species were recorded within the Site: slow worm, viviparous lizard and grass snake. These species primarily utilise the grassland habitats within the north of site.
- 6.2.5. Breeding bird surveys found that Chattenden Barracks supports several Birds of Conservation Concern (BoCC) Red-listed species, including nightingale, dunnoek, linnet, house sparrow, starling, song thrush.
- 6.2.6. Of those species identified within the site, the presence of Nightingales requires most attention due to the need for additional off-site compensation associated with their loss.

## 6.3 HOMES ENGLAND'S EXISTING ECOLOGICAL WORK

- 6.3.1. Homes England has undertaken a sustained programme of ecological management and monitoring across the Lodge Hill estate since 2018, underpinned by statutory obligations and a commitment to long-term stewardship. This includes:
  - Active SSSI management across key woodland and grassland compartments, using rotational cutting, scrub control, and restructuring of secondary plantation woodland to maintain favourable conditions for Nightingales and other notified features.
  - Extensive Nightingale territory mapping, with annual surveys conducted by the British Trust for Ornithology (BTO) since 2012. These surveys show a stable and increasing population, with a clear shift in territory distribution toward high-quality habitat areas in the northern part of the SSSI.
  - Habitat enhancement techniques, including mulching, brash pile creation, and targeted interventions to support successional scrub and open mosaic habitats.
  - Spatial analysis of Nightingale hotspots, demonstrating that the most densely populated areas are over 1km from Chattenden Barracks, with fewer than 10 territories recorded on or adjacent to the site.
- 6.3.2. This evidence base has directly informed the mitigation and compensation strategy for Chattenden Barracks and supports the conclusion that ecological impacts can be effectively managed. A full technical summary, including survey data and habitat management details is provided in Appendix 8.5.

## 6.4 ECOLOGICAL ENGAGEMENT SUMMARY

- 6.4.1. Homes England has undertaken structured and proactive engagement with key stakeholders to inform the ecological strategy for Chattenden Barracks. This includes formal collaboration with

Natural England under a Discretionary Advice Service (DAS), consultation with Kent County Council and Medway Council, and dialogue with the RSPB. These discussions have helped shape a shared (factual) understanding of the site's ecological sensitivities and the opportunities for delivering meaningful environmental benefits. The collaborative nature of this engagement provides a strong foundation for the development of a robust and policy-compliant compensation and mitigation strategy. The following section outlines how this strategy has been developed to ensure that the proposed development at Chattenden Barracks can proceed in a way that supports both housing delivery and long-term ecological resilience.

- 6.4.2. A detailed summary of the engagement and advice received to-date is provided in Appendix 8.6.

## 6.5 MITIGATION AND COMPENSATION STRATEGY

- 6.5.1. The proposed Masterplan at Chattenden Barracks has been carefully designed to respond to the site's ecological sensitivities, particularly its proximity to the Chattenden Woods and Lodge Hill SSSI and, more specifically in relation to the known locations of Nightingale territories. While the site itself is largely PDL, Homes England recognises that any development in this location must be underpinned by a robust and policy-compliant ecological strategy.
- 6.5.2. In accordance with Paragraph 193 the NPPF and relevant guidance, Homes England has adopted the mitigation hierarchy as the foundation of its approach. This hierarchy requires that impacts on biodiversity and designated sites are addressed in the following order:
1. **Avoidance** – preventing harm through careful site selection, layout, and design;
  2. **Mitigation** – reducing or minimising impacts through on-site measures;
  3. **Compensation** – offsetting any residual impacts through off-site habitat creation or enhancement.
- 6.5.3. Homes England has applied this hierarchy rigorously in the development of its strategy. From an avoidance perspective, the whole Lodge Hill site was initially proposed for up to 5000 homes (as part of a significant mixed-use development), however over the years Homes England has refined the proposals to avoid the core Nightingale territories located within the Chattenden Woods and Lodge Hill SSSI and has now restricted residential development to Chattenden Barracks. This progression of the scheme demonstrates alignment with the avoidance principles by moving proposed development away from key Nightingale territory hotspots and restricting development to a considerably smaller (less impactful) portion of land.
- 6.5.4. However, in light of the site's proximity to the SSSI and the known presence of a limited number of Nightingale territories within the site, it is acknowledged that both direct and indirect impacts on Nightingales cannot be fully avoided or fully mitigated on-site. As such, it is acknowledged that compensatory measures will be required that clearly outweigh the impacts on Nightingale and broader impacts to Nightingale within the wider national network of sites.

### ON-SITE MITIGATION

- 6.5.5. The proposed development has been designed to incorporate a range of on-site (embedded) mitigation measures that seek to minimise potential impacts on the SSSI and its applicable notified features - the Nightingale population and adjacent Ancient Woodland (principally to the northern boundary).
- 6.5.6. A key component of the mitigation strategy is the retention of the existing SSSI fenceline, which provides a physical barrier between the development and the SSSI. This boundary will be reinforced

through a layered approach to mitigation, comprising of a 30m buffer zone designed to deter domestic cat predation and reduce edge effects. The buffer will include dense scrub planting, natural screening, and transitional habitat zones to discourage access into the SSSI by both people and pets, while also enhancing ecological connectivity. The buffer is also on an existing steep upward incline which further acts as a deterrent to people (recreational pressure) and (to a degree) domestic animals and provides opportunities for natural surveillance onto the space.

- 6.5.7. To further reduce the risk of disturbance and recreation pressure, the development has been designed to internalise recreational activity. A network of green corridors and circular walking routes will be provided within the Chattenden Barracks site offering attractive alternatives to people movement towards the SSSI for everyday recreation. These routes will be integrated with areas of new open space and informal play, helping to draw activity away from sensitive habitats. In addition, making the Chattenden Recreation Ground a more formalised space will help with this. Aside from the Masterplan, there is the wider provision of non-SSSI in adjacent areas, notably (in part) the Deangate Community Parkland that's location (in close proximity to Chattenden Barracks) would facilitate the natural movement of people towards this parkland space, reducing potential impacts on the SSSI.
- 6.5.8. While these measures are expected to significantly reduce (to some degree) the potential for adverse impacts on protected species, Homes England acknowledges that residual impacts on Nightingales and the SSSI cannot be fully mitigated on-site. In accordance with the Mitigation Hierarchy set out within the NPPF, off-site compensatory measures are therefore required.

## **COMPENSATION PACKAGE**

- 6.5.9. To fulfil the development's compensation package, Homes England is proposing to bring forward a concentrated habitat creation and management strategy on land within its ownership at Lodge Hill – this land being located to the far north of the Lodge Hill landholding but sitting directly adjacent to existing parts the Chattenden Woods and Lodge Hill SSSI. This strategy builds on Homes England's long-standing role in maintaining the favourable conservation status of its owned parcels within the SSSI and is designed to replicate and extend the favourable habitat conditions found in the Ex-training area and Rough Shaw – two of the most densely populated Nightingale areas within the SSSI. This strategy is being developed through close engagement with Natural England and is aligned with the assessment criteria agreed between Homes England and Natural England, mirroring that set out in Medway Council's draft Nightingale Impact Assessment methodology (factoring in literature reviews).
- 6.5.10. The compensation strategy is underpinned by three overarching objectives:
- To deliver a proportionate net gain in Nightingale population within Homes England's landholding;
  - To ensure continuance of the long-term resilience of the Nightingale population on this SSSI;
  - To bring about opportunities for the wider SSSI network through the Local Nature Recovery Strategy (LNRS).
- 6.5.11. The approach mirrors the successful habitat management techniques already in use within the SSSI, including the use of brash piles, successional scrub development, and brownfield substrate features. The compensation land will be managed in a similar way to existing Nightingale habitats present in the CWLH SSSI, ensuring continuity in habitat structure, management intensity, and ecological function.

## **OBJECTIVES**

- 6.5.12. The strategy will focus on the following key objectives:

- **Habitat creation and enhancement:** The compensation land will be designed to provide suitable breeding habitat for Nightingales, including a mosaic of mixed-age scrub, open ground, and transitional woodland edge. This has been informed by the substantial period of Nightingale territory mapping data and habitat management experience on the site.
- **Spatial targeting:** Compensation areas will be located in parts of the Lodge Hill estate that are ecologically appropriate (in close-proximity to high densities of Nightingales) and at good distances from existing or proposed developments, ensuring that there is a provision of high quality habitat suitable to support Nightingales over the medium to long term. These areas will be selected based on their proximity to existing dense Nightingale hotspots and their potential for colonisation.
- **Long-term management and monitoring:** The compensation land will be subject to a long-term ecological management plan, secured through appropriate legal and funding mechanisms. This will include ongoing habitat maintenance, monitoring of Nightingale populations, and adaptive management to ensure the success of the compensation measures.

## IN SUMMARY

- 6.5.13. Homes England's mitigation and compensation strategy for Chattenden Barracks has been developed to directly address the ecological sensitivities of the site and its proximity to the Chattenden Woods and Lodge Hill SSSI. While avoidance and on-site embedded mitigation measures will reduce a degree of potential impacts, the delivery of a phased, evidence-led compensation land strategy aims to ensure that impacts on Nightingale Territories are appropriately addressed.
- 6.5.14. This approach has been shaped through ongoing engagement with Natural England and will be supported by long-term monitoring and adaptive management. The strategy provides a clear and deliverable pathway to securing meaningful ecological outcomes and reinforces the case for the site's allocation within a sound and environmentally responsible Local Plan.

## 6.6 WIDER STRATEGIC OPPORTUNITIES

- 6.6.1. The Regulation 19 Local Plan identifies the need for Strategic Environmental Management Scheme (SEMS) to mitigate the ecological impacts of planned growth across the Hoo Peninsula, particularly on European-designated sites and SSSIs. The Interim Habitats Regulations Assessment (HRA) acknowledges that Lodge Hill could contribute to this strategy.
- 6.6.2. Land at Lodge Hill was included by Medway Council as part of a historic SEMS component under the previous Housing Infrastructure Fund (HIF) programme (that Medway Council withdrew from). The purpose of the previous SEMS was to create a multi-functional network of green spaces to provide recreational space for local residents and reduce pressure on more sensitive existing habitats around the Hoo Peninsula.
- 6.6.3. The SEMS comprised of four sites at that stage, including Lodge Hill. The latest SEMS strategy does not formally include Lodge Hill within the SEMS, instead the area is annotated as 'Proposed Open Space'.
- 6.6.4. Given the evolving nature of the existing SEMS and ongoing discussions, Homes England is not committing Lodge Hill land to the SEMS and reserves the right to comment further as discussions progress. Specifically identified land parcels to the north of the wider asset are currently focused on providing compensatory habitat for the Chattenden Barracks development. It is also noted that the Interim Habitats Regulations Assessment (HRA) will be updated, and Homes England will review and respond to any revised proposals or evidence relating to the SEMS as part of that process.

- 6.6.5. In parallel, Homes England is also exploring off-site BNG opportunities across the wider Lodge Hill estate. These opportunities could deliver open mosaic habitats and other early successional features that are increasingly rare in the wider landscape. While a portion of available (and appropriate) BNG land will be used to offset the Chattenden Barracks development, additional capacity is being explored to fully understand any BNG surplus position and how that provision can be best utilised into the future. This approach not only maximises the ecological value of the Lodge Hill estate but also provides a practical and policy-compliant solution to the challenge of delivering BNG in constrained or sensitive locations.
- 6.6.6. The allocation of Chattenden Barracks therefore presents an opportunity to not only deliver a sound and environmentally responsible development, but also has the longer-term potential to contribute to wider strategic frameworks for ecological enhancement in the immediate vicinity to Lodge Hill and strategically across the wider Hoo Peninsula.

## 6.7 SUMMARY OF COMPARATIVE ASSESSMENT

- 6.7.1. Homes England has reviewed the treatment of ecological constraints across allocated sites in the Regulation 19 Draft Local Plan and identified inconsistencies in how these have been applied. Notably:
- **HHH6 (Land at Chattenden East)** is within 400m of the SSSI and has similar ecological sensitivities to Chattenden Barracks, yet this site was allocated as it is stated that there are only minor ecological concerns.
  - **HHH12 (Land South of Main Road, Hoo)** overlaps with Ancient Woodland and the Medway Estuary and Marshes SSSI, in addition to being in close proximity to internationally designated sites, but this site was allocated based on the potential for mitigation.
- 6.7.2. In contrast, Chattenden Barracks was excluded despite having fewer constraints, a more advanced mitigation strategy, and extensive ecological evidence underpinning this. This inconsistency undermines the robustness of the site selection process and raises concerns about the Plan's soundness.
- 6.7.3. A full comparative analysis of HHH3, HHH6, and HHH12 is provided in Appendix 8.7.

## 7 SOUNDNESS TEST AND RECOMMENDATION

---

- 7.1.1. Homes England recognises the significant progress made by Medway Council in preparing a strategy to meet the area's housing and infrastructure needs and the need for an up-to-date plan to fill an obvious local policy void. However, as currently drafted, the Local Plan remains fragile in several key areas - particularly in relation to housing delivery, ecological mitigation, and the robustness of its evidence base and therefore, we consider the Plan is 'unsound'.
- 7.1.2. The exclusion of Chattenden Barracks (HHH3) from the Plan introduces unnecessary risk to its soundness. The site is a large, previously developed landholding in public ownership, with a clear delivery trajectory and a comprehensive ecological strategy developed in close consultation with key consultees and stakeholders. Its omission, despite comparable or greater ecological sensitivities being accepted on other allocated sites (e.g. HHH6), highlights inconsistencies in the application of the Plan's assessment criteria and undermines the justification for its current spatial strategy.
- 7.1.3. The Regulation 19 Draft Local Plan also refers to the preparation of a Hoo Planning Framework to guide development across Hoo and Chattenden. However, this Framework is not published, has no defined status, and lacks a clear timetable for adoption. As Homes England is progressing an OPA for Chattenden Barracks with submission targeted for Q3 2025, the site is demonstrably capable of being delivered independently, with its own ecological mitigation and compensation strategy and infrastructure contributions. Requiring conformity with an undefined Framework would introduce unnecessary delay and uncertainty, undermining the site's early delivery potential. Homes England therefore requests that the allocation of Chattenden Barracks be treated as a standalone strategic site, not contingent on any emerging Hoo Planning / Environmental Framework, and that the Local Plan be updated to clarify the status, scope, and timing of the Framework to ensure transparency and effectiveness. Homes England is progressing an outline planning application for Chattenden Barracks on this basis.
- 7.1.4. On this basis, the inclusion of Chattenden Barracks would significantly enhance the Plan's ability to meet the tests of soundness set out in paragraph 36 of the NPPF. Specifically, it would:
- Reinforce the Plan's justification by aligning with its brownfield-first strategy and spatial vision for the Hoo Peninsula;
  - Improve the Plan's effectiveness by strengthening the housing trajectory and providing early, deliverable supply;
  - Ensure the Plan is positively prepared by supporting the delivery of strategic infrastructure, ecological mitigation, and dealing with a large, vacant site through good and proper planning;
  - Support environmental soundness through an appropriate and robust compensation strategy aligned to long-term ecological stewardship potential.
- 7.1.5. In addition, Homes England considers that the Plan would benefit from a more clearly defined narrative on the objective of SEMS along with a more informed approach to the delivery of the Strategic Environmental Management Scheme (SEMS) suite of sites across the Hoo Peninsula. The allocation of Chattenden Barracks could provide the initial conduit in assisting the formulation of a wider (implementable) vision around wider habitat creation and functional ecological network linkage. The Plan as currently drafted considers land in Homes England's ownership to the north of the Ex-Military Training Area to be Proposed Open Space. This is without any evidential justification or direct relation to policies in the Plan and this reference should be removed.



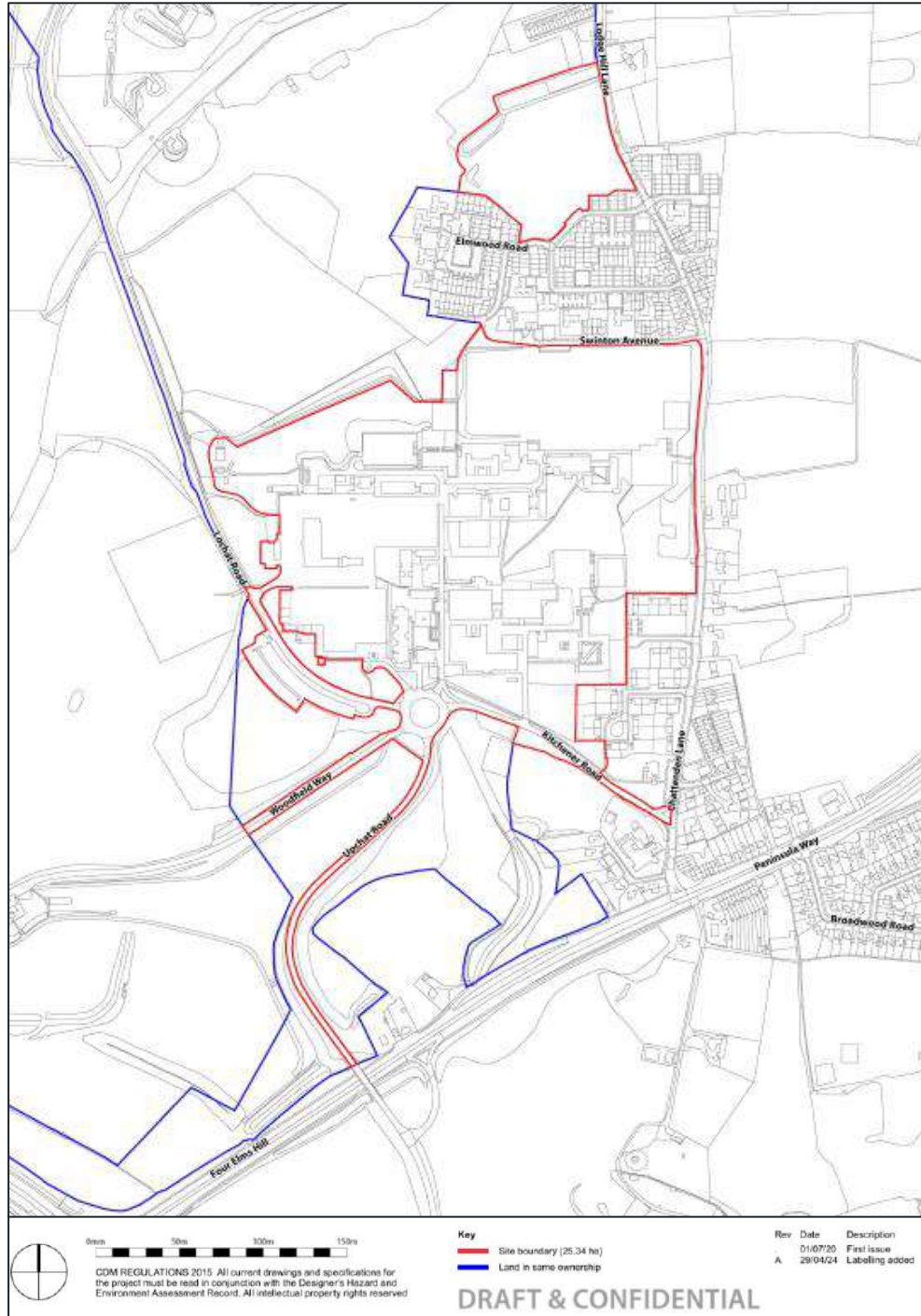
7.1.6. Homes England therefore respectfully recommends that:

- Chattenden Barracks (HHH3) is allocated within the Local Plan as a strategic site;
- The Sustainability Appraisal is reviewed to ensure consistency in the assessment of ecological impacts across comparable sites;
- The Plan includes a clear mechanism as to how a coordinated and deliverable SEMS strategy is being taken forward and how that aligns to longer term land being made 'acceptable' for development.

7.1.7. As it stands Homes England consider the Plan to be unsound and these changes would not only address current weaknesses in the Plan but would also provide a more resilient and deliverable framework for sustainable growth across Medway.

## 8 APPENDIX

### 8.1 APPENDIX 8.1 – SITE LOCATION PLAN



## 8.2 APPENDIX 8.2 – PDL STATUS OF CHATTENDEN BARRACKS

### INTRODUCTION

- 8.2.1. Homes England's strong support for the allocation of Chattenden Barracks is rooted in its status as a substantial area of Previously Developed Land (PDL). Paragraph 124 and 125(c) of the NPPF gives substantial weight to the utilisation of brownfield land for new development where substantial harm can be overcome. The Framework defines PDL (or brownfield land) (at Annex 2) as:

*"Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed."*

- 8.2.2. Annex 2 further states that PDL excludes:

- Land that is or was last occupied by agricultural or forestry buildings
- Land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures
- Land in built-up areas such as residential gardens, parks, recreation grounds and allotments
- Land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

- 8.2.3. The NPPF strongly encourages the prioritisation of brownfield land to support new development (e.g. Paragraph 147), particularly where it is well-located for access to services and facilities, minimises the need to develop greenfield sites and makes efficient use of existing infrastructure.

### APPLICATION TO CHATTENDEN BARRACKS

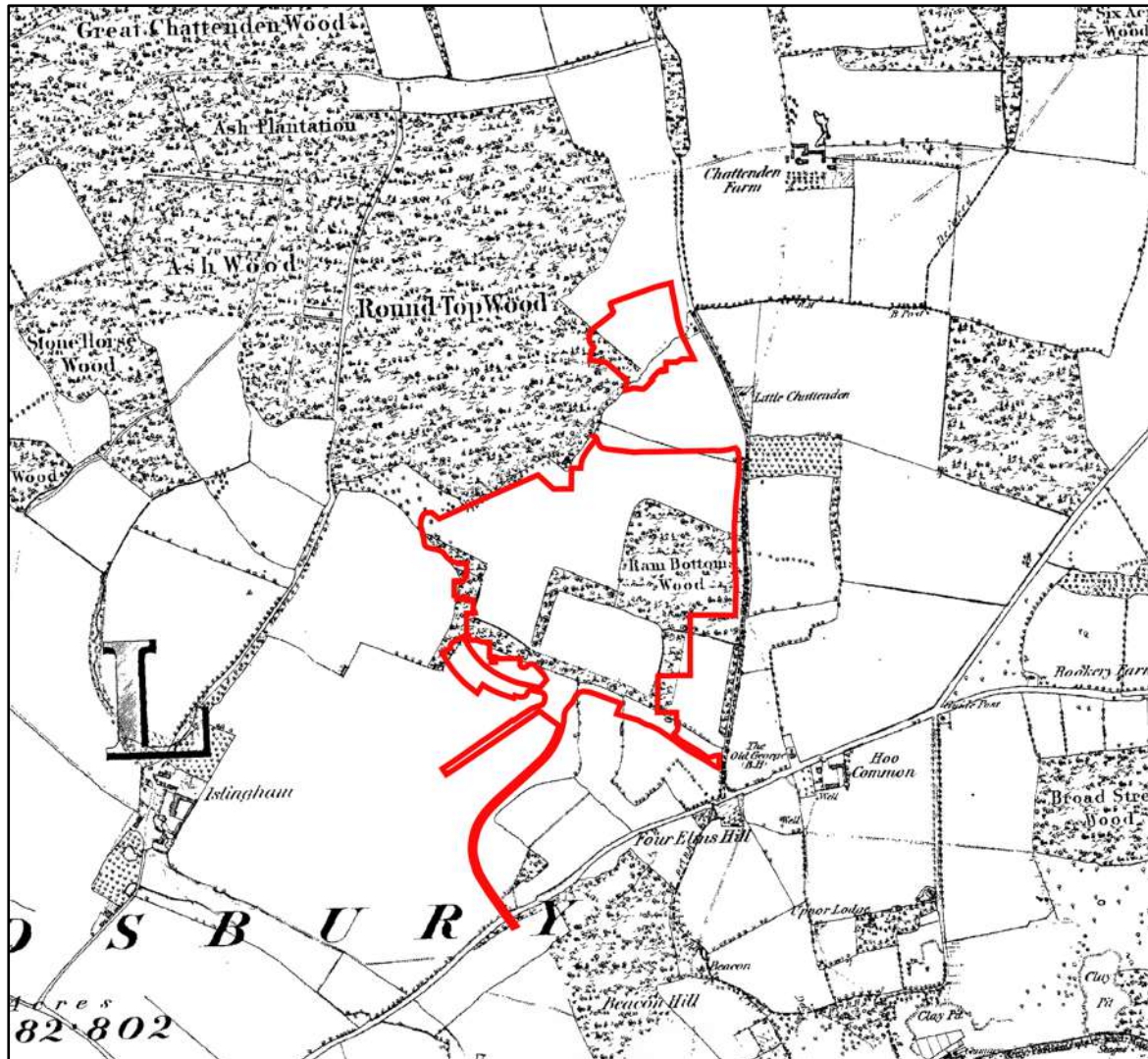
- 8.2.4. The Chattenden Barracks site has a long and demonstrable history of lawful development and occupation as a military establishment. It is characterised by:

- **Permanent Structures:** The site was extensively occupied by a multitude of permanent military buildings, including barracks, administrative offices, storage facilities, and other associated structures. There are also smaller structures remaining on-site. These fall within the NPPF's definition of "permanent structure" and date back to the mid-1900s.
- **Fixed Surface Infrastructure:** Evidence on the site includes significant areas of fixed surface infrastructure, such as an established road network, parade grounds, car parks, and utility connections (water, drainage, electricity) that supported the military operations. These are the types of "fixed surface infrastructure" and "large areas of hardstanding which have been lawfully developed" referenced in the NPPF definition. In addition, these parts of the site are still prevalent today and have not "blended into the landscape".
- **Curtilage of Developed Land:** The entire operational area of the former barracks, including the land immediately surrounding the buildings and infrastructure, constitutes the "curtilage of the developed land." While the NPPF notes that not the whole curtilage should be assumed to be developed, a significant proportion of the Chattenden Barracks site is judged to fall within this category due to its comprehensive military use. Homes England recognise that there are areas within the curtilage which are not PDL, including Rams Bottom Wood and the Former Chattenden Barracks Sports Field. In doing so, the approach taken forward for development at Chattenden Barracks is a landscape-led approach that does not seek to develop the full extent of the land.

- 8.2.5. Therefore, Chattenden Barracks represents a notable example of previously developed land, prime for redevelopment in accordance with national policy objectives.
- 8.2.6. In support of the above points, this annexed document includes a variety of maps and drawings which demonstrate use and development of the Chattenden Barracks site from the late 1800s until today. The report is intended to contribute towards an understanding of the PDL Status of the site.

## HISTORIC MAPS

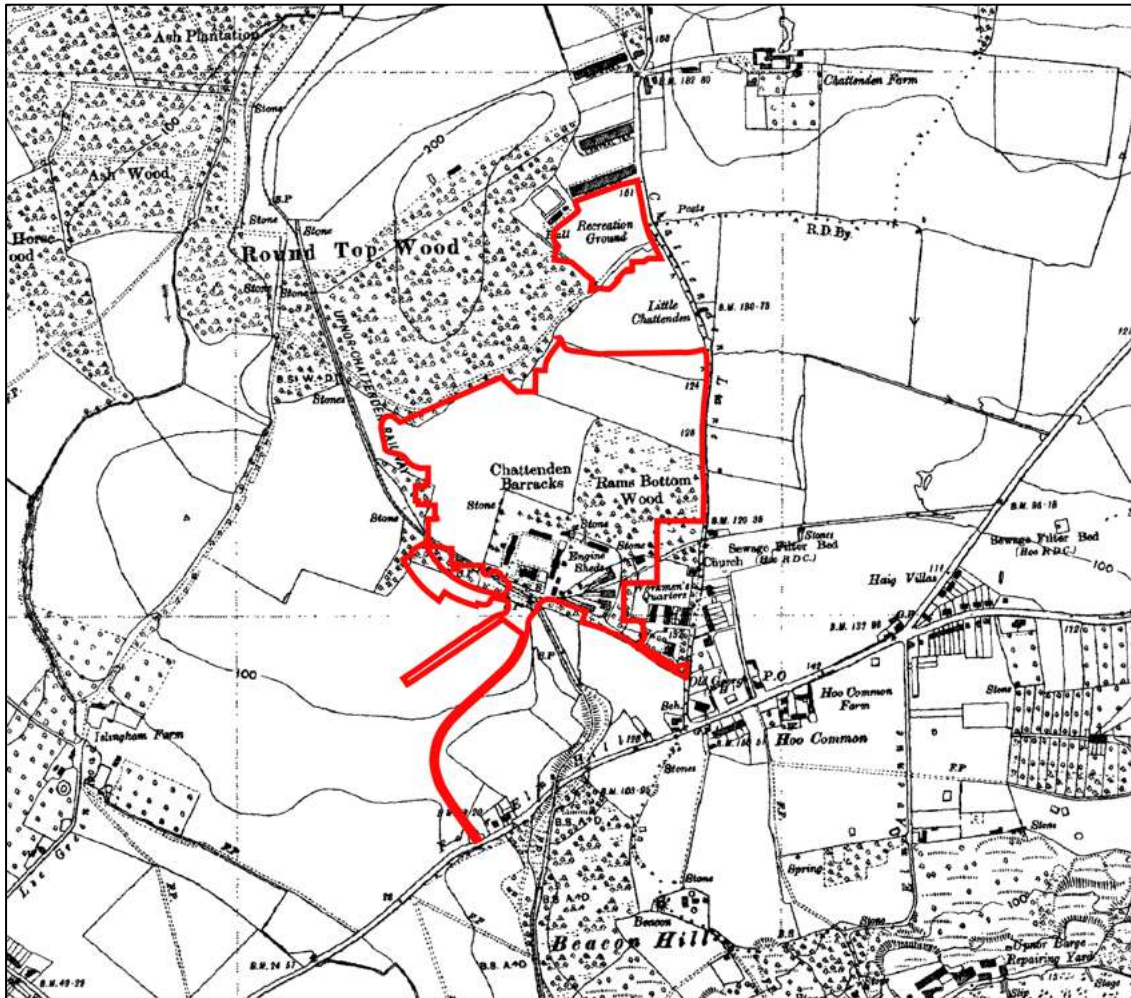
### 1870 Map



- 8.2.7. At this stage, the land was not developed, with Round Top Wood and Rams Bottom Wood both remaining as prevalent features. Chattenden Lane was already a well-established route through Chattenden, connecting the area to the north.

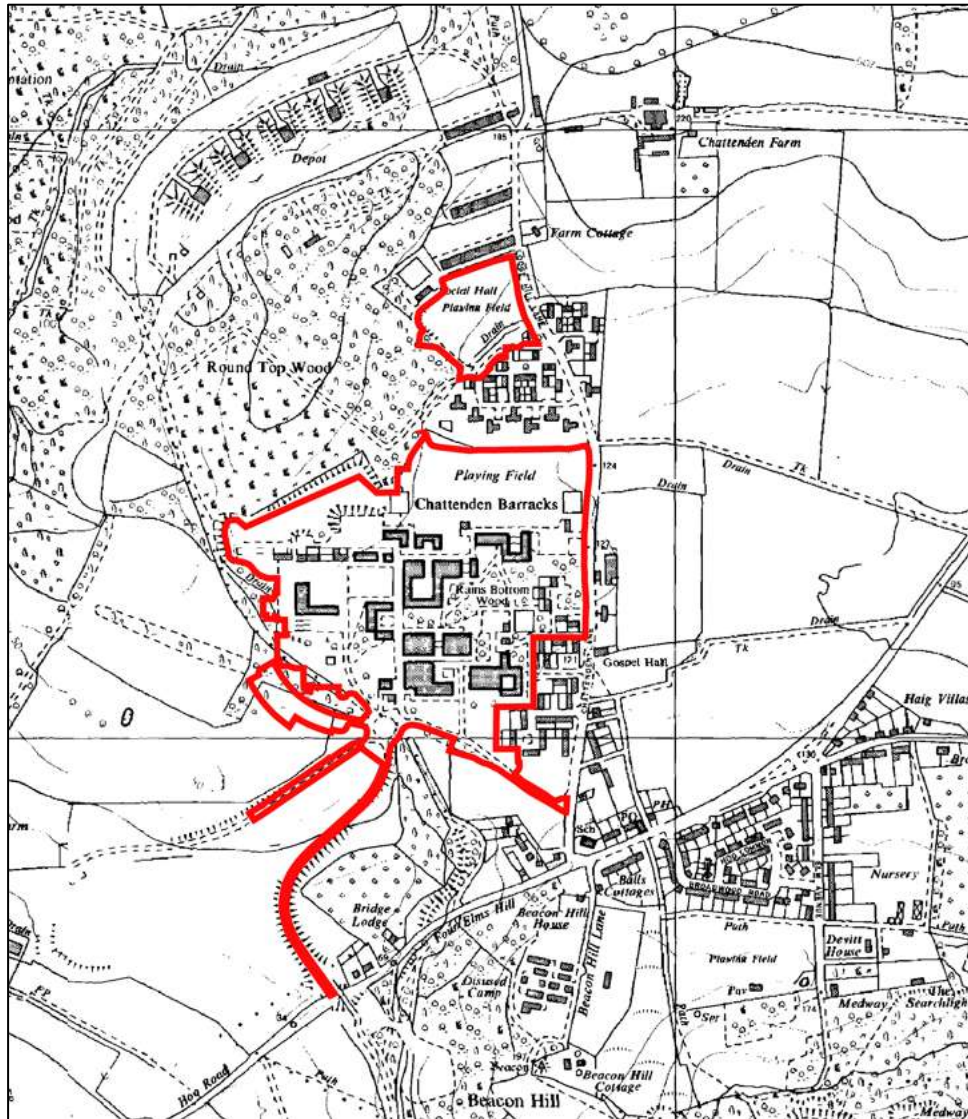


## 1938 Map



- 8.2.8. The 1938 mapping demonstrates the beginning of the established military use of the site. The area now comprises of several large Engine Sheds for trains associated with the military. In addition, some ancillary buildings are present near to the existing Kitchener Road roundabout. The site is also serviced by a railway which connects to the northern areas of Lodge Hill, linking from the River Medway. A significant area of Round Top Wood had been cleared to make way for the large munitions compound which remains present.

## 1968 Map



- 8.2.9. The 1968 mapping is the first example of Chattenden Barracks' built form being established in a similar layout to what is present on the site today (shown through the road network and slab remnants). The built form comprises several larger buildings, which include offices, accommodation and a parade ground. To the north of the site, Chattenden Barracks Playing Field is first established and is used for various sports provision associated with the Barracks. This map also begins to see progression of the wider Chattenden Area, with areas to the north and east of the site being built out for housing. These were primarily associated with Barracks, housing soldiers stationed at the site.



## 1990 Aerial Photography



- 8.2.10. The 1990 aerial photography demonstrates the intensive use of the site by the military. There are significant areas of hardstanding afforded for parking and limited tree cover across the site. Areas of Rams Bottom Wood had been removed for additional entrances to the site, a tennis court and additional parking. The area south of Lochat Road had also been formed as parking, with areas to the west showing buildings which went close to the boundary of the site.

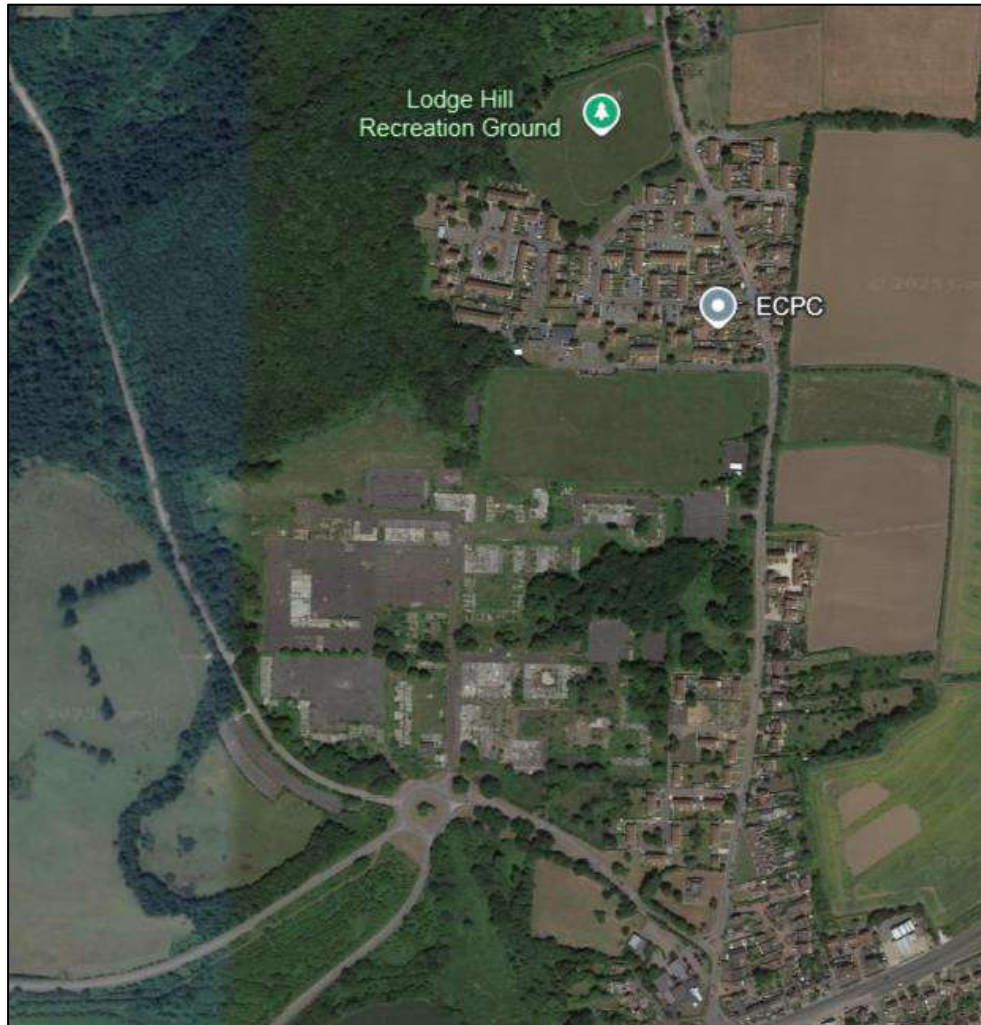
## 2006 Aerial Photography



- 8.2.11. At this stage, Chattenden Barracks was demolished, with all the main buildings removed from the site. The remaining land consists of large hardstanding, with building slabs left in position, demonstrating the previous built form. The former military playing field was left in situ, along with Rams Bottom Wood, though access was appropriately restricted to both. The established entrances and exits to the site were also left appropriately secured.



## 2014 Aerial Photography



- 8.2.12. This image demonstrates the continued PDL nature of the site in 2014 (at a time when areas of Lodge Hill were SSSI notified for the surrounding woodland). The areas of hardstanding remain prevalent within the site showing some areas of vegetation growth given the incremental decant of military operations by the MoD from parts of the asset.

## EXISTING SITE

### 2025 Aerial Image

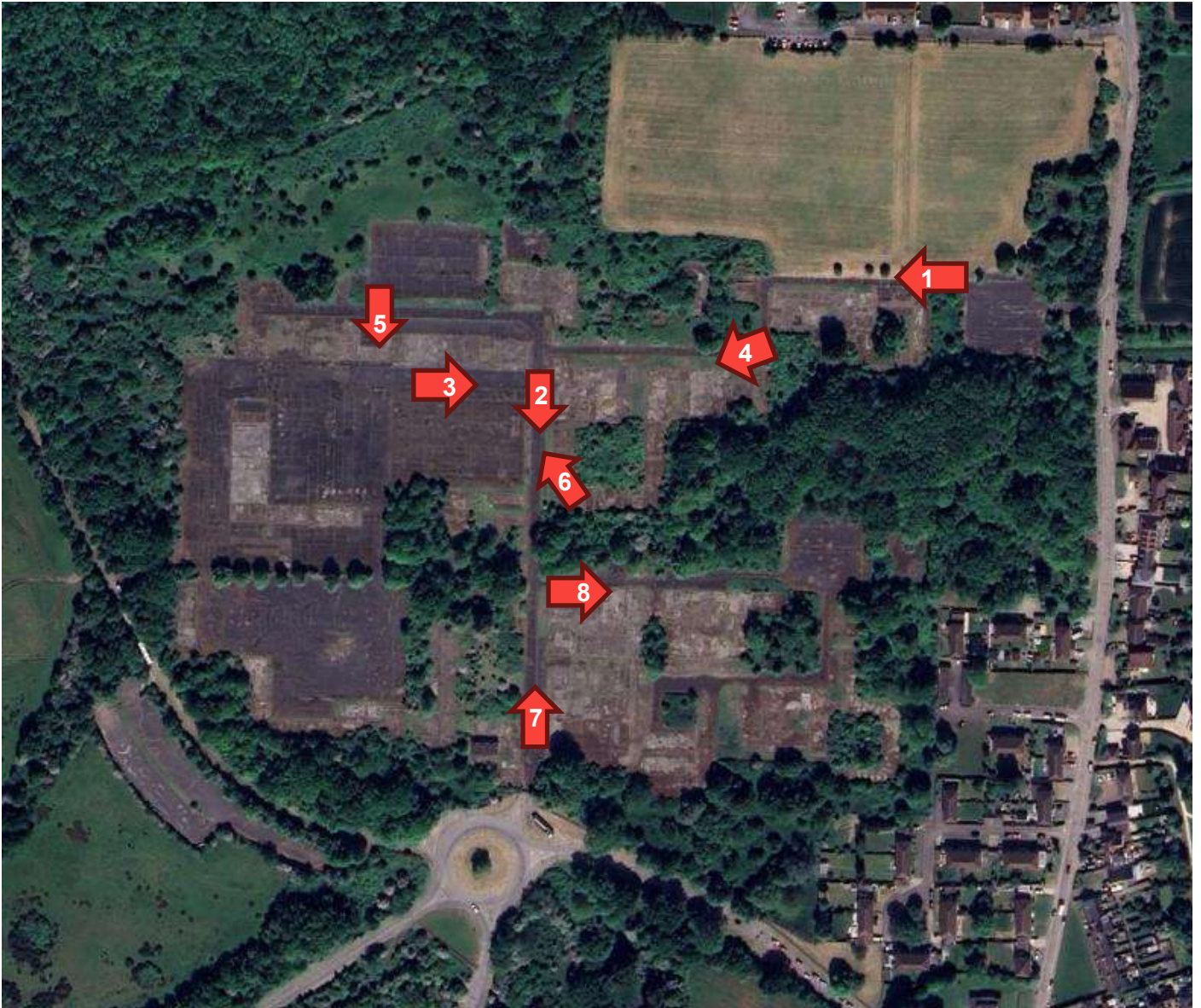


- 8.2.13. The above aerial photography demonstrates that the site has remained in a vacant status until the present day. In the following pages, various site photos have been included which show the present on-site conditions. The numbered photos show much of the previous site infrastructure and hardstanding areas, along with the location identified on the below key plan. All photos were taken between February and June 2025.



## SITE PHOTOS

- 8.2.14. The following key plan identifies nine locations of site photographs taken between February and July 2025. These photos demonstrate the current condition of the site, predominantly showing large areas of hardstanding with minimal shrub and vegetation growth on surfaces. The photos also reflect the existing Rams Bottom Wood and the surrounding area.





**Photo 1 – Looking West from Chattenden Lane Entrance**



**Photo 2 – Looking south along the primary internal road through the site towards the Kitchener Road Roundabout**





**Photo 3 – Looking east along previous road towards Rams Bottom Wood**



**Photo 4 – Looking southwest from the northeast corner of the main site**



**Photo 5 – Looking south from the northern edge of the site**



**Photo 6 – Looking northwest towards Round Top Wood**





**Photo 7 – Looking north along the primary (internal) road from the Kitchener Roundabout**



**Photo 8 – Looking east towards Rams Bottom Wood**



## CONCLUSION

- 8.2.15. In accordance with the above photographs and site information, Chattenden Barracks is considered to be predominantly Previously Developed Land in accordance with the Definition set out within the NPPF. The site has a well-documented history of lawful development, with extensive areas showing:
- Concrete slabs, building foundations and exposed floors from demolished structures.
  - Intact internal road networks, kerb lines, lamp posts and structural planting.
  - Widespread hardstanding areas and site infrastructure such as flood lighting and fencing.
  - Ruderal vegetation (brambles and buddleia) emerging from cracks in surfacing, consistent with PDL character.
- 8.2.16. While some areas have experienced natural regeneration, particularly along the edges and within mature woodland at Rams Bottom Wood, these are clearly delineated and excluded from the developable area sought as part of the emerging OPA. The playing field in the north-east corner, although classified as non-PDL under NPPF guidance, has not been publicly accessible for over 15 years. As such, under the emerging policy framework of the Regulation 19 Medway Local Plan, this area is considered developable, reflecting its long-term disuse and lack of public access.
- 8.2.17. The developable area proposed within the OPA has therefore been carefully defined to utilise the majority of the PDL, ensuring that redevelopment is focused on land where the built form and infrastructure remain discernible. This approach respects the site's environmental sensitivities, with significant tree cover and areas adjacent to the Chattenden Woods & Lodge Hill SSSI being retained and protected.



## 8.3 APPENDIX 8.3 – DRAFT FRAMEWORK MASTERPLAN

### THE DRAFT FRAMEWORK MASTERPLAN



## 8.4 APPENDIX 8.4 - EVIDENCE BASE REVIEW

8.4.1. The following Appendix sets out a review of the relevant Evidence Base Documents within the Local Plan, looking at not just how they impact Chattenden Barracks and the wider Lodge Hill site, but also general comments that have been extracted through the research. This is intended to supplement the representations made by Homes England and cover additional detail to the main document. Whilst all documents have been reviewed, the following are explored in more detail below:

- Medway Local Plan Sustainability Appraisal Parts 1-3 Sustainability Appraisal
- Strategic Housing Land Availability Assessment
- Local Plan Viability Assessment
- Infrastructure Delivery Plan
- Interim Habitats Regulations Assessment
- Strategic Transport Assessment
- Local Housing Needs Assessment
- Village Infrastructure Audit

8.4.2. Homes England is highly cognisant and aware of the Duty to Cooperate (DtC) and in the circumstances of the Medway Local Plan, it does not wish to comment or provide any preclusion on this at this stage.

### MEDWAY LOCAL PLAN SUSTAINABILITY APPRAISAL

8.4.3. The Sustainability Appraisal (SA) is a statutory requirement for Local Plans, ensuring that environmental, social, and economic considerations are integrated into the plan-making process. It assesses the likely significant effects of the Plan and its reasonable alternatives, providing a framework for identifying and mitigating negative impacts while enhancing positive ones. Medway Council's SA (2025) is therefore a central document underpinning the Plan's strategic choices and site allocations.

#### Key Findings

8.4.4. At the Regulation 18b stage, Chattenden Barracks (HHH3) was explicitly identified as a reasonable alternative site and included within two of the Strategic Development Options. The 'blended approach' now progressed in the Regulation 19 Draft Local Plan previously incorporated HHH3 as a key component of its housing strategy. However, the site has since been omitted from the proposed allocations.

8.4.5. The SA (Ref: F4.2.1) states that a small proportion of Site HHH3 coincides with the Chattenden Woods and Lodge Hill SSSI and that development could lead to habitat degradation and disturbance to ground-nesting Nightingales. It acknowledges that mitigation - such as retaining tree cover at Rams Bottom Wood and providing alternative open space - could reduce adverse effects but concludes that "site-specific assessments are likely to be needed to confirm opportunities to avoid or mitigate effects." Despite this, the SA ultimately cites "uncertainty regarding the potential ecological impact" as a reason for the site's exclusion.

8.4.6. Notably, the summary impact tables in both the Regulation 18b and Regulation 19 SAs (Table I.4.1, page 106) show that HHH3 scores identically across all 12 Plan Objectives in the post-mitigation scenario. This consistency raises questions about the rationale for the site's exclusion, particularly given that its assessed performance did not change between stages.



- 8.4.7. The SA assigns an indicative capacity of 400 dwellings to Chattenden Barracks, an unevidenced reduction from the 500 units previously promoted by Homes England. This figure is lower than the 450 units currently proposed in the emerging Masterplan, reflecting the detailed engagement and technical work that has been carried out to inform the Masterplan.
- 8.4.8. Alongside HHH3, the SA has information on all other sites that have been selected to be progressed for allocations within the Regulation 19 Local Plan. Notably, HHH6 (Land east of Chattenden) has allocated for up to 550 homes. This site is explored in further detail below.

### **Homes England Commentary**

- 8.4.9. Homes England notes the revised potential capacity for Chattenden Barracks within the 2025 Sustainability Appraisal (SA), which now indicates 400 units. This represents a reduction from the (up to) 500 dwellings that Homes England previously promoted through various engagements, including the recent EIA Scoping Request (Medway Council Ref: MC/25/0584). Further to more detailed engagement and technical analysis, Homes England is promoting a residential-led scheme of up to 450 dwellings to ensure an optimal layout respecting environmental sensitivities, and through this work they are confident in the deliverability of this number of homes. The SA informing the Regulation 19 Plan did not go into such detail and erroneously reduced the number of units it examined to a significant degree without any justification.
- 8.4.10. It is important to highlight that a capacity below 500 units would technically position Chattenden Barracks beneath the threshold for a 'Strategic Allocation' within this Draft Plan. Given the site's significant scale, brownfield status, and Medway Council's 'brownfield first' strategy, Homes England maintains that Chattenden Barracks remains a strategic opportunity regardless of its precise capacity, contributing substantially to the overarching housing requirements of the Plan. Its inclusion remains critical for a robust and sound housing delivery strategy for the Hoo Peninsula.
- 8.4.11. More critically, Homes England asserts that the SA's stated reason for the site's omission – "uncertainty regarding ecological impact" – is now outdated and demonstrably overcome. As detailed in Section 6.0 of these Representations (Wider Ecological Benefits from the Development), Homes England has undertaken extensive ecological surveys, proactive engagement with Natural England through a formal Discretionary Advice Service (DAS) arrangement, underpinned by a Statement of Cooperation, and is progressing a robust mitigation and compensation strategy. This work resolves the previously cited ecological uncertainties and demonstrates that development can proceed with a net positive ecological impact.
- 8.4.12. Furthermore, the boundary of Chattenden Barracks has been intentionally drawn to exclude the Chattenden Woods and Lodge Hill SSSI. The SA's assertion (Ref: F4.2.1) that the site "coincides" with the SSSI is factually incorrect and materially affects its conclusions. This mischaracterisation should be corrected to ensure the SA reflects the true environmental context and the mitigation and compensation measures that are within Homes England control.

### **Comparative Analysis – HHH6 (Land East of Chattenden)**

- 8.4.13. Homes England has reviewed the Sustainability Appraisal (SA) for Site HHH6 to understand the justification for its allocation over Chattenden Barracks. HHH6 is located immediately adjacent to Chattenden Barracks, on the opposite side of Chattenden Lane, and is proposed for up to 550 homes, including the relocation and expansion of Chattenden Primary School and a new Local Centre.

- 8.4.14. The SA (Ref: Table I.2.1) assessed both sites at the pre-mitigation stage and, notably, attributed stronger performance to Chattenden Barracks in several key areas, including Landscape, Flooding, and Pollution and Waste. While HHH3 scored lower for Ecology and Biodiversity, Section 6 of this representation demonstrates that this assessment is based on outdated or incomplete information, and that a robust mitigation and compensation strategy is now in place.
- 8.4.15. Both sites were ranked similarly across Natural Resources, however, Homes England contend that the utilisation of HHH6, a large greenfield site, should have scored lower. With Chattenden Barracks being a PDL site, this results in less impact on Natural Resources and aligns with the NPPFs prioritisation of PDL over greenfield. The emerging Masterplan will also achieve BNG and ensure that much of the existing tree cover on site is retained. This should be reflected in the post-mitigation scenario to better depict the development potential of the site.
- 8.4.16. While the SA presents a justification for the allocation of HHH6, it does not adequately consider the mitigation measures available at Chattenden Barracks or the site's alignment with the Plan's core Strategic Objectives. Homes England contends that a reassessment of HHH3, incorporating the updated ecological evidence and mitigation strategy, would result in a more favourable and accurate appraisal. This would support the site's allocation and contribute to the soundness of the Plan

#### **In Summary**

- 8.4.17. The Sustainability Appraisal does not provide a robust or up-to-date justification for the exclusion of Chattenden Barracks as an allocated site within the Local Plan. The site was previously identified as a reasonable alternative and scored consistently across both Regulation 18b and 19 assessments. The cited ecological concerns have since been addressed through detailed technical work and formal engagement with Natural England (as discussed in detail below). The SA's capacity figure is also inconsistent with the site's scale and delivery potential.
- 8.4.18. Homes England considers that the SA should be updated to reflect the current evidence base and evidence made available to the Council at both Regulation 18 stage and subsequent engagement and pre-application engagement – and that Chattenden Barracks should be reinstated as a strategic allocation. This would ensure consistency, transparency, and alignment with the relevant NPPF tests.

### **STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT**

- 8.4.19. The Strategic Housing Land Availability Assessment (SHLAA) is Medway's foundational evidence base document for identifying a pipeline of sites suitable, available, and achievable for housing development across the plan period. It is designed to objectively assess potential land for residential use and inform the subsequent site allocation decisions within the Local Plan.

#### **Key Findings**

- 8.4.20. Medway's SHLAA (June 2025) includes Chattenden Barracks within its comprehensive assessment of potential sites, acknowledging its significant size and brownfield nature. However, despite these inherent characteristics, the SHLAA's findings did not lead to the site's allocation within the Regulation 19 Draft Local Plan.
- 8.4.21. The SHLAA (Ref: Stage 2 Site Assessment, Site ID: HHH3, p.1663) confirms that Chattenden Barracks is:
- Available for development.
  - Previously developed land (PDL).

- A preferred site at Regulation 18b, with a proposed yield of up to 500 dwellings.
- Not selected at Regulation 19, with no residential yield assigned for the plan period, deeming the site both 'not suitable' and 'not achievable'.

8.4.22. The site was assessed on a gross area of 23.83 hectares, with a desktop-estimated yield of 447 dwellings based on a 0.625 gross-to-net ratio and 30 dwellings per hectare. The site is also identified as having contaminated land risks (78.07% of the site), which is typical of former MoD land and can be addressed through remediation. There are no identified constraints relating to access, flooding, heritage, or legal ownership.

### **Homes England Commentary**

- 8.4.23. Homes England welcomes the SHLAA's confirmation that Chattenden Barracks is available and previously developed.
- 8.4.24. However, the assessment that the site is not suitable and not achievable is inconsistent with the site's characteristics and the progress made since the Regulation 18b Local Plan. With no new evidence presented by the Regulation 19 Draft Plan and supporting documents to justify the change in assessment. The assessment in the SHLAA also indicates that the evidence base has not been consistent in its approach, the example being that the SHLAA estimate is 447 dwellings and the SA an unjustified reduction to 400 dwellings.
- 8.4.25. This is but one example of the supporting documents to the draft Local Plan showing inconsistencies in basic evidence and approach applied has not been integrated consistently across the documents. The drafting of the Plan feels rushed to get to a target date and as such it has not fully considered all the options in the detail they should have been given, and this has resulted in a flawed approach to the non-allocation of Chattenden Barracks.
- 8.4.26. Homes England is the sole landowner and has a remit to accelerate the delivery of housing and is actively progressing an Outline Planning Application supported by a comprehensive Masterplan and ecological strategy. Homes England is committed to bring this site forward within the first five years of the Plan period.
- 8.4.27. The site's exclusion from the Regulation 19 Draft Local Plan is inconsistent with its previous status as a preferred site at Regulation 18b stage, and with the SA's post-mitigation scoring (which remained exactly the same at the Regulation 19 stage), which indicates that environmental impacts can be addressed. The SHLAA's conclusion that the site is not suitable or achievable overlooks the progress made by Homes England in addressing ecological constraints, which was reported to Medway during the drafting of the Regulation 19 Plan.
- 8.4.28. Homes England therefore considers that the SHLAA should be updated to reflect the site's deliverability and strategic value, and that Chattenden Barracks should be allocated within the Local Plan to support its soundness

### **LOCAL PLAN VIABILITY ASSESSMENT**

- 8.4.29. The Local Plan Viability Assessment (LPVA) is a crucial evidence base document designed to assess the overall viability of the Local Plan, ensuring that the policies and proposed allocations are financially deliverable over the plan period. It evaluates the cumulative impact of policy requirements, including developer contributions, on the deliverability of development sites.

## Key Findings

- 8.4.30. Homes England welcomes the acknowledgement within the LPVA that technical representations were submitted in relation to Chattenden Barracks and Lodge Hill Camp during the April 2025 consultation on the early LPVA. These representations included detailed commentary on site-specific assumptions, market evidence, and the treatment of brownfield viability within the LPVA. However, the discussion within the LPVA notes that Chattenden Barracks has not been included in the overall assessment, as it is not allocated, but does contend that the site is brownfield.
- 8.4.31. For the Chattenden & Hoo St Werburgh Area, identified primarily for residential development, the Viability Assessment notes that there is a significant amount of infrastructure required (further detail available in the IDP). This is expected to be primarily paid for through Section 106 contributions, which total £35,238 per unit. This exceeds the next nearest totals for other Strategic Sites in the Draft Plan by over £9,000 (i.e. Rainham being £25,718 per unit) and compared to the Early Viability Assessment, this change results in a significant increase adding to the pressure of affordable housing delivery.
- 8.4.32. The LPVA also sets out the Affordable Housing Strategy for Medway. This notes that the majority of the large Greenfield Sites will be targeting 30% affordable housing, with lower value Greenfield Sites Targeting 25%. Previously Developed Land is expected to obtain 10%, this lower value is attributed to the anticipated remediation costs associated with PDL land. The conclusion of the LPVA states that the viability on Brownfield sites is likely to be more challenging than greenfield alternatives. This may lead to further questions over the high Section 106 requirements and may result in significant challenge to the affordable housing numbers across the district.

## HOMES ENGLAND'S COMMENTARY

- 8.4.33. Homes England notes that, despite the engagement with the Council, Chattenden Barracks was not modelled as a potential strategic site within the LPVA. Chattenden Barracks was previously identified as a reasonable alternative at Regulation 18b stage and has been actively promoted by Homes England with a clear delivery trajectory. Therefore, despite its omission, Homes England is confident in the viability of the scheme being put forward given the work undertaken to-date, ensuring delivery in line with local requirements.
- 8.4.34. Homes England contends that the omission of Chattenden Barracks from the allocated sites undermines the Plan's overall viability and its strategy for securing essential infrastructure, including both transport upgrades and environmental enhancements. Chattenden Barracks represents a unique opportunity as a large, deliverable brownfield site that is poised for early delivery within the plan period. The allocation of Chattenden Barracks also adds to the allocated housing supply, making a meaningful contribution to reducing the exceptionally high Section 106 burden placed on developments within the Chattenden and Hoo St Werburgh Strategic Sites.
- 8.4.35. The timely receipt of contributions from early delivering sites like Chattenden Barracks is key to the credibility and deliverability of necessary works. By excluding Chattenden Barracks, Medway Council risks delaying or jeopardising the funding streams necessary for critical infrastructure, thereby placing undue viability pressure on later-phase developments and potentially impacting the overall soundness of the Local Plan.
- 8.4.36. The LPVA confirms that strategic sites were modelled individually where the delivery of the Plan relies on them. Given the scale, location, and public ownership of Chattenden Barracks, Homes England maintains that the site meets this threshold and should have been tested accordingly.

## INFRASTRUCTURE DELIVERY PLAN

- 8.4.37. The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements needed to support the growth proposed in the Local Plan. It identifies existing infrastructure capacity, projected needs arising from new development, and a strategy for how and when necessary infrastructure will be delivered and funded over the plan period. This includes identifying key projects, their estimated costs, funding sources (such as developer contributions, grant funding, and public sector investment), and responsible delivery bodies. The IDP aims to demonstrate that the infrastructure required to make the Local Plan's growth deliverable is achievable, ensuring the overall soundness of the Plan.

### Key Findings

- 8.4.38. The IDP acknowledges that development on the Hoo Peninsula is significantly challenging due to the scale of growth required. It states that extensive new infrastructure, such as schools, new GP clinics, transport projects (such as improved bus services, sustainable transport links, and highways mitigations), and new community, economic, culture and leisure facilities, will be essential for the area to grow into a thriving rural town.
- 8.4.39. Specifically, regarding education infrastructure, the IDP (Ref: Section 2.6 & Section 3.3) highlights critical timings. The expansion of Hoo St Werburgh by 1 Form Entry (FE) is needed by September 2027 to meet existing demand arising from developments brought forward ahead of the Local Plan. Furthermore, the proposed developments around Chattenden and High Halstow will necessitate the relocation and expansion by 1 FE of both Chattenden and High Halstow Primary Schools by September 2028 and 2029, respectively. Additional capacity of up to 4 FE will be required on the Hoo Peninsula by September 2032.
- 8.4.40. A key strategic component of the IDP is the Hoo Peninsula Strategic Environmental Programme (Section 3.7), which includes three identified sites (Cockham, Hoo Wetlands, and Deangate) to provide public open space and potential habitat enhancements. The delivery of these sites was originally supported by Housing Infrastructure Fund (HIF) funding secured in 2019. However, the LPA's withdrawal from the HIF programme in 2023 led to these being put on hold. Notably, Medway Council, who had included land at Lodge Hill as part of an earlier Strategic Environmental Management Scheme (SEMS) concept, has now not included this land within the Draft Plan.
- 8.4.41. The total cost of the current SEMS programme is estimated at £14 million within the IDP, with only £975,000 currently secured for Deangate Community Parkland through Section 106 contributions. The justification for the valuation attributed to the SEMS strategy does not appear present through the Regulation 19 Local Plan consultation. While these are iterative documents which we understand are to be updated prior to submission, this lack of detail at this stage of the Plan does give the appearance that these strategies have not been developed sufficiently to give the confidence that soundness is being achieved.
- 8.4.42. On transport infrastructure, the IDP (Ref: Section 3.2) outlines a funding strategy based on pooled developer contributions enabled by the 2019 amendments to the Community Infrastructure Levy (CIL) Regulations. This approach replaces individual Section 106 agreements for off-site infrastructure with a centralised infrastructure fund. Trigger points for contributions (e.g. prior to commencement or completion) will be agreed through the development management process. The IDP also notes that achieving the "place-based vision for access and movement" may become more difficult once additional highway capacity is delivered and therefore encourages development proposals to demonstrate lower trip generation than the assumed vehicle trip credit. Medway Council will monitor

trip credits and manage developer contributions, with Grampian-style conditions potentially imposed to restrict occupation until mitigation is in place.

### **Homes England Commentary**

- 8.4.43. The omission of Chattenden Barracks as an allocated site from the Local Plan presents a missed opportunity to account for early developer contributions from a large, deliverable brownfield site. Incorporating Chattenden Barracks into the Local Plan would not require greater costs to infrastructure required to support it, would more accurately reflect the true scale of growth in Chattenden and ensure that infrastructure planning is aligned with the spatial strategy.
- 8.4.44. On transport, the IDP (Ref: Section 3.2) acknowledges existing issues regarding congestion and the limited capacity across the peninsula. Chattenden Barracks offers an opportunity to contribute early to transport mitigation, including strategic junction upgrades. Its allocation would allow the site to be factored into the wider viability modelling and infrastructure cost assumptions, improving the overall viability of the area and helping to moderate Section 106 expectations across other sites. As a large, deliverable brownfield site under Homes England's control, Chattenden Barracks represents a key opportunity to generate early and substantial developer contributions. These contributions are vital to the timely inflow into Medway's pooled infrastructure fund and the delivery of critical infrastructure.
- 8.4.45. Homes England therefore recommends that Chattenden Barracks be allocated within the Local Plan to strengthen the IDP's infrastructure delivery strategy, ensure timely and coordinated investment, and support the soundness of the Plan.

### **In Summary**

- The site's early delivery potential and public ownership make it a key contributor to pooled Section 106 funding. This is not accounted for within the current IDP.
- The IDP lacks contingency measures that help to ensure the timely delivery of infrastructure if proposed allocated sites do not come forward.
- Consistent with historic communications with Medway Council, Homes England does not commit its land to the SEMS at this stage and reserves the right to comment further as discussions with Medway Council and Natural England continue.

### **INTERIM HABITATS REGULATIONS ASSESSMENT**

- 8.4.46. The Interim Habitats Regulations Assessment (HRA) is a critical evidence base document that evaluates the potential impacts of the Local Plan on internationally designated nature conservation sites, including Special Protection Areas (SPAs), Special Areas of Conservation (SACs), and Ramsar sites. Its purpose is to determine whether the Plan, either alone or in combination with other plans or projects, would adversely affect the integrity of these protected sites.

### **Key Findings**

- 8.4.47. The Hoo Peninsula is an area of significant ecological sensitivity, supporting extensive protected habitats and rare species, including those for which the SPAs are designated. The Interim HRA identifies potential impact pathways from planned development - such as increased recreational pressure, air quality deterioration, and hydrological changes - and outlines the need for mitigation measures to avoid adverse effects. It also underpins the requirement for a Strategic Environmental Management Scheme (SEMS) to manage and offset these impacts.



8.4.48. The Interim HRA (Ref: Section 7.2) identifies potential risks to the integrity of designated sites, including the Chattenden Woods and Lodge Hill SSSI and the Thames Estuary and Marshes SPA. It notes that development in proximity to these areas, could result in habitat loss, disturbance to protected species (notably Nightingales), and increased recreational pressure. The HRA highlights the need for site-specific mitigation and strategic environmental management to avoid adverse effects. Four SEMS are described:

- *Cockham Community Parkland.*
- *Hoo Wetlands Reserve.*
- *Deangate Community Parkland.*
- *Green Infrastructure (GI) Improvements and projects, which could include Homes England's proposed Environmental Framework plan for Chattenden Woods and Lodge Hill.*

8.4.49. The HRA (Ref: Paragraphs 7.2.28 – 7.2.29) further states:

*The Hoo Peninsula Strategic Environmental Programme will be secured through both Policy S2 (see paragraph 7.2.18), Policy SA8 (see paragraph 7.2.19) and the Infrastructure Delivery Plan (IDP) as set out in Policy 24 (Infrastructure Delivery). The IDP sets out the required level and phasing of infrastructure to support the proposed development. The IDP is an iterative document that is to be monitored and reviewed over time to ensure the timely and effective delivery of infrastructure.*

*Whilst the final details of the Hoo Peninsula Strategic Environmental Programme are currently being worked up, it is expected that funding for long-term management of measures such as the Hoo Peninsula Strategic Environmental Programme, in perpetuity, will be secured through the IDP. The Programme will also link to other wider initiatives such as wider GI provision and greenspaces, Biodiversity Net Gain (BNG) delivery and Local Nature Recovery Networks (LNRN). Homes England is developing an environmental Framework Plan across the wider Lodge Hill site, with potential to integrate with Deangate Community Parkland as part of a strategic programme for the Hoo Peninsula. The Programme will be taken forward by a number of stakeholders including the Council, Natural England, nature conservation bodies and organisations, local community groups and developers. A delivery body, such as a third-party environmental body/charity/trust, will be set up to ensure the long-term management of the Programme in perpetuity.*

8.4.50. It is further acknowledged within the Council's Duty to Cooperate that the Interim HRA will be updated in due course, with a focus on updating the Hoo Peninsula Strategic Environmental Programme. Homes England is keen to understand these updates in more detail and be part of additional conversations on the project. On this basis, further specific comments on the SEMS strategy will be reserved for a later Representation once the full scope is understood.

### **Homes England Commentary**

8.4.51. Homes England is undertaking exploratory work relating to the future of land to the north of the Lodge Hill asset to ascertain what wider environmental benefit could be created (beyond its statutory management obligations). Homes England is not committing any land to SEMS at this stage due to the uncertainty in approach (and objectives) within the Local Plan – it is Homes England's view that further clarity is needed on what SEMS is seeking to achieve in the context of wider development on the Hoo Peninsula and how SEMS is being incorporated within a longer term (implementable) Hoo Peninsula Environmental Framework.

- 8.4.52. The interim HRA also states that a programme will be taken forward with a number of stakeholders. Homes England anticipates that it will be one of these stakeholders but is unaware of any programme being established at this point in time. As a consequence, the Plan is lacking in not yet establishing the remits or programme for SEMS and the evidence base is not yet sufficiently developed to make the Plan sound. Regarding a future delivery body being set up to ensure long term management of this programme, Homes England again recognises that any involvement must be carefully considered and should not unduly impact on their long-term aspirations and disposal of Chattenden Barracks. These matters should form part of the ongoing engagement between parties and be reflected accurately in the final version of the HRA.
- 8.4.53. While the HRA refers to three SEMS sites and a fourth category of wider GI improvements (potentially including Lodge Hill), only the three named sites have been carried forward into the Regulation 19 Plan and are referenced in Policy SA8 (not including land at Lodge Hill).
- 8.4.54. Homes England also does not consider it to be appropriate as to why the area to the north of Lodge Hill ex-military training area is currently shown as an area of 'Proposed Open Space' on the Hoo St Werburgh Concept Plan (Regulation 19 Local Plan – Figure 14) without any explanation and/or policy justification for this in Plan at this stage.
- 8.4.55. Bringing forwards Chattenden Barracks enables the provision of on-site Nightingale mitigation through buffering, creation of scrub treatment and retention of key existing fence lines, in addition to the delivery of off-site compensation land to secure additional habitats (Nightingale 'carrying capacity').

#### **In Summary**

- The Interim HRA identifies significant ecological risks on the Hoo Peninsula and highlights the need for strategic mitigation through the SEMS.
- Chattenden Barracks will offer a viable mechanism to support the necessary ecological mitigation and can be brought forward without reliance on SEMS. To be clear, the development is intending to mitigate and compensate its own impact (as explained in subsequent sections) and Homes England have the ability to do this through their land holdings.
- Homes England intends to comment further once the HRA is updated and discussions with Medway Council and Natural England progress.

#### **STRATEGIC TRANSPORT ASSESSMENT**

- 8.4.56. The Strategic Transport Assessment (STA) forms a key part of the Local Plan evidence base. It evaluates the impact of proposed growth on Medway's transport network, identifies necessary mitigation measures, and informs the infrastructure strategy set out in the IDP. The STA includes a suite of technical documents covering junction modelling, trip rate assumptions, mode share strategies, and mitigation costings.

#### **Key Findings**

- 8.4.57. The Regulation 19 Forecasting Report confirms that Chattenden Barracks is no longer included in the transport modelling, despite its previous inclusion at Regulation 18 stage. This omission is important as it demonstrates that the within the previous iteration of the Plan that development could come forward at Chattenden Barracks alongside others in the Hoo Peninsula. This confirms that the additional infrastructure requirements arising from Chattenden Barracks is negligible and that the allocation of the site will support this delivery.

- 8.4.58. The Mode Share and Trip Rate Assessment Tool sets out assumptions for car mode share across development sites. It notes that sites on the Hoo Peninsula are expected to retain a 70% car mode share, but that this could reduce to 60% with the implementation of key sustainable transport measures, including Bus Rapid Transit (BRT), Local Cycling and Walking Infrastructure Plans (LCWIP), and internalisation strategies. The document highlights the potential of BRT to shift mode share and reduce congestion, particularly around Four Elms Roundabout, one of the most congested junctions in the network.
- 8.4.59. The Mode Share Strategy (Stage 3) identifies a preferred scenario for transport mitigation, combining LCWIP by 2031, internalisation by 2031, and BRT by 2036. It emphasises the importance of “vision-led” development, particularly on the Hoo Peninsula, and recommends that Transport Assessments include a Vision Statement and Vision Monitoring Framework.
- 8.4.60. Junction modelling reports confirm that mitigation schemes at Four Elms Roundabout, Sans Pareil Roundabout, and A228/Main Road Hoo are effective in improving capacity. However, the Proportionality Assessment notes that Chattenden Barracks was not included in the final “Do Something” scenario.

### **Homes England Commentary**

- 8.4.61. Homes England notes that Chattenden Barracks has been excluded from the Regulation 19 transport modelling, despite its previous inclusion at Regulation 18 stage. This omission means that the site’s potential trip generation, mitigation needs, and contribution to strategic transport infrastructure have not been assessed. Given the site’s scale and strategic location, this creates a gap in the evidence base and particularly risks underestimating funding opportunities associated with the site. Linked to both the LPVA and IDP, this further supports the allocation of Chattenden Barracks to help unlock funding opportunities by reducing the perceived burden on other sites, whilst also contributing early in the plan period.
- 8.4.62. The Mode Share Strategy and associated technical notes emphasise the importance of “vision-led” development on the Hoo Peninsula, including early delivery of Bus Rapid Transit (BRT), Local Cycling and Walking Infrastructure Plans (LCWIP), and internalisation strategies. Homes England supports this approach and is actively considering how Chattenden Barracks can contribute to these measures. The site’s Masterplan includes opportunities to support mode shift and reduce car dependency, aligning with the preferred mitigation scenarios identified in the transport evidence base.
- 8.4.63. Homes England recommends that Chattenden Barracks be reintroduced into the transport modelling and proportionality assessments to ensure that its potential contributions to strategic infrastructure are fully captured. This would improve the robustness of the transport evidence base and support the soundness of the Local Plan under the NPPF tests of being justified, effective, and positively prepared.

### **IN SUMMARY**

- Chattenden Barracks was excluded from the Regulation 19 transport modelling, creating a gap in the evidence base and underestimating its infrastructure contributions.
- The site aligns with the preferred “vision-led” mitigation strategy for the Hoo Peninsula, including BRT, LCWIP, and internalisation.
- Its omission from the Proportionality Assessment means its role in supporting key junction upgrades has not been considered.

## LOCAL HOUSING NEEDS ASSESSMENT

- 8.4.64. The Local Housing Needs Assessment (LHNA) 2025 forms a key part of the evidence base for the Medway Local Plan. It provides a detailed analysis of demographic trends, household projections, and housing market dynamics to determine the scale and type of housing needed across Medway. The LHNA uses the Government's standard method to calculate the minimum annual housing need and supplements this with localised analysis of affordability, tenure mix, and specialist housing requirements.
- 8.4.65. As of March 2025, Medway's local housing need figure stands at 1,636 dwellings per annum, an increase from the previous year's figure of 1,594. This reflects updated demographic projections and affordability ratios. Over the 15-year plan period (2026–2041), this equates to a minimum requirement of approximately 24,540 homes, which forms the basis of the Local Plan's housing target.

### Key Findings

- 8.4.66. The LHNA identifies (Ref: Section 8. Conclusions and Summary) a number of critical housing needs across Medway, including:
- A significant shortfall in affordable housing, with a need for approximately 400 affordable homes per year;
  - A requirement for a diverse housing mix, including family-sized homes, smaller units for downsizers, and accessible homes for older people and those with disabilities;
  - A growing need for specialist housing, including supported accommodation and housing for older persons; and
  - A need to support self-build and custom-build housing, in line with national policy.
- 8.4.67. The LHNA also highlights the importance of delivering housing in sustainable locations with access to services, infrastructure, and employment opportunities. It supports a spatial strategy that balances urban regeneration with strategic growth on the Hoo Peninsula, where infrastructure investment can unlock significant housing capacity.

### Homes England Commentary

- 8.4.68. Homes England supports the findings of the LHNA and the ambition to meet Medway's full housing needs. However, the exclusion of Chattenden Barracks from the Local Plan undermines the ability to deliver the scale, mix, and type of housing identified in the LHNA.
- 8.4.69. Chattenden Barracks is capable of delivering up to 450 new homes with the appropriate amount of affordable housing and mix of units. As a Homes England-led scheme, the site also offers the potential for a variety of delivery models, including First Homes, shared ownership, and accessible housing. To help support this various delivery partners are being explored for the site, including the SME market which can help to facilitate more diverse housing types.
- 8.4.70. The site's scale and masterplan-led approach also support the delivery of a diverse housing mix, including family homes, smaller units, and self-build plots. Its location within Chattenden, adjacent to existing services and infrastructure, aligns with the LHNA's emphasis on sustainable growth and accessibility.
- 8.4.71. The omission of Chattenden Barracks from the Local Plan therefore represents a missed opportunity to deliver a significant quantum of housing that directly aligns with the identified needs in the LHNA. Its inclusion as an allocated site would strengthen the Local Plan's ability to meet the NPPF tests of



being positively prepared and effective, particularly in relation to affordable housing delivery and housing mix.

### **In Summary**

- The LHNA identifies a clear need for market and affordable housing, diverse housing types, and sustainable growth locations.
- Chattenden Barracks can deliver new homes across tenure types and supports a range of housing types in line with the requirements of the LHNA.
- The site's location and masterplan approach align with the LHNA's spatial and policy objectives.
- Its exclusion from the Local Plan weakens the strategy's ability to meet identified housing needs.

## **VILLAGE INFRASTRUCTURE AUDIT**

- 8.4.72. The Village Infrastructure Audit is an evidence base document that assesses the existing capacity and condition of local infrastructure and community facilities within the Hoo Peninsula's villages. This typically includes a review of local schools, healthcare facilities (such as GP clinics), community centres, sports facilities, local retail, and public transport links. The Audit aims to identify any existing deficiencies and assess how these facilities would be impacted by anticipated population growth from new development. It informs the Local Plan's strategy for upgrading or expanding existing infrastructure, or indeed, the need for entirely new facilities, to ensure that the quality of life and provision of essential services for both new and existing residents are maintained or improved.

### **Key Findings**

- 8.4.73. The Village Infrastructure Audit (VIA) 2025 provides a detailed and structured assessment of the availability, condition, and community aspirations for infrastructure across Medway's rural settlements. It is a key component of the Local Plan evidence base and offers valuable insight into the challenges and opportunities facing the Hoo Peninsula, including Chattenden and Hoo St Werburgh.
- 8.4.74. The audit confirms (Ref: Conclusions p.27) that while Hoo St Werburgh is relatively well-served, surrounding villages (like Chattenden) currently have a more limited range of services and facilities. This includes gaps in local scale healthcare, public transport, and local retail provision. The audit also highlights wider issues across the Peninsula, including traffic congestion (notably at the Four Elms Roundabout), limited evening and weekend bus services, and varied access to green infrastructure and employment opportunities.

### **Homes England Commentary**

- 8.4.75. Homes England welcomes the Local Plan's recognition of these challenges and recognises that the proposed allocation of HHH6 (Land at Chattenden East) includes provision for a new retail hub. This is a positive step toward addressing the current imbalance in service provision and reducing reliance on skeleton retail provision located along the Four Elms Hill (Jet Garages) and more comprehensive provision located further away in Hoo and Strood for everyday needs.
- 8.4.76. While HHH3 (Chattenden Barracks) is not the designated location for the retail hub, Homes England's proposals are to include a small convenience retail unit. This is intended to complement the wider retail strategy and provide early access to local services for new and existing residents. The delivery of this unit aligns with the Local Plan's spatial strategy and supports the principle of walkable, mixed-use neighbourhoods.

- 8.4.77. More broadly, the VIA reinforces the case for allocating Chattenden Barracks as a strategic site. The site is well-positioned to contribute to the delivery of infrastructure identified in the audit, including:
- Early S106 contributions to support infrastructure delivery;
  - On-site and off-site green infrastructure, including potential links to Deangate Community Parkland;
  - Improved access to open space through enhancements to the Chattenden Barracks Recreation Ground.
- 8.4.78. Homes England considers that the allocation of Chattenden Barracks would directly support the delivery of the IDP, the CIF, and the objectives of the VIA. It would help to address long-standing infrastructure deficits in Chattenden, support the delivery and future vitality of the proposed retail hub at HHH6, and contribute to a more balanced and sustainable settlement pattern across the peninsula.

#### **In Summary**

- The VIA identifies clear infrastructure deficits in Chattenden.
- Chattenden Barracks can help address these gaps through early delivery of housing, green infrastructure, and a convenience retail unit.

## 8.5 APPENDIX 8.5 - HOMES ENGLANDS EXISTING ECOLOGICAL DATA

### SSSI MANAGEMENT

- 8.5.1. This section details the ongoing management of the SSSI and provides an overview of the ecological data that informs the detail of the mitigation and compensation strategy that would allow for Chattenden Barracks to be brought forward for new homes.
- 8.5.2. Homes England has been actively managing the Chattenden Woods and Lodge Hill SSSI since early 2018 as part of their statutory obligation as an owner of a large extent of the Chattenden Woods & Lodge Hill SSSI. The SSSI is notified on the basis of three key features:
- Nationally important Nightingale population.
  - Neutral grassland communities (MG5 grassland).
  - Ancient woodland communities.
- 8.5.3. On this basis, SSSI management incorporates works to maintain the favourable conservation status of the site to ensure ongoing retention and long-term viability of Nightingale habitat, something which is required due to their preference for dense scrub and thicket habitat across the site, which without active management can develop into tall, leggy, unfavourable habitat, lacking suitable structure to support this species. Additionally, a balance has been struck between encouraging the development of high-quality scrub across the site whilst limiting scrub encroachment across SSSI grassland communities.
- 8.5.4. Topping works using tractor and flail mount were undertaken in 2018 and 2019 to address the vigorous development of scrub within the field interiors. Since then, mechanical grass-cutting has been undertaken in July/August on the Site within core grassland compartments.
- 8.5.5. On this basis, Homes England's SSSI statutory management to date has had the following main objectives:
- To maintain on-site habitat provision for Nightingale and building population resilience;
  - To ensure that woodland/scrub management is undertaken in a phased and rotational approach, thus providing a longer-term provision of dynamic scrub growth at different stages;
  - To carry out phased felling and restructuring of secondary plantation woodland (as a short-term priority); and
  - To maintain and improve diversity of grassland communities through active management - mechanical cutting in the short term).
- 8.5.6. The principal woodland management approach has been the felling and/or restructuring of unmanaged secondary plantation woodland (planted by the military around 25-30 years ago and considered low quality) both within ancient woodland and outside to provide extensive additional habitat niches for Nightingale, allowing colonisation of birds near identified future habitat creation areas.
- 8.5.7. Homes England has also carried out other management techniques across the SSSI, including use of remote-controlled mulchers to open up dense scrubby areas, namely to the northern areas around the Ex-Military Training Area to further optimise the condition of Nightingale habitat. As the owner of the land, Homes England will be continuing to implement a series of woodland and scrub management activities across the following locations:
- Lodge Hill Wood;

- Wybornes Wood;
- Deangate Wood; and
- Secondary Plantations within the Ex-training area.

## NIGHTINGALE DATA COLLECTION

- 8.5.8. Homes England has access to extensive levels of data for Nightingales within the SSSI dating back to 2012. Data has been collected by a single surveyor from the British Trust for Ornithology (BTO) who had been contracted by the Defence Infrastructure Organisation and Homes England since surveys began. The survey methodology, using a standardised intensive territory mapping approach, is described in the respective annual reports provided by the BTO for Homes England. The survey focuses on the number of singing male Nightingales at Chattenden Woods & Lodge Hill SSSI annually, with dataset available for the period 2012 – 2025 (except for 2014 where no data was collected). This has provided an indication of the trajectory of the population and distribution of territories since the extension of the SSSI and inclusion of breeding Nightingales as a designated feature, as well as the degree of annual variation in numbers.
- 8.5.9. The data collection over this extensive period of time is critical in enabling a robust understanding of territory mapping and distribution at the site annually, since the extension of the SSSI notification in 2012, enabling between year comparisons and helping to target areas for further management.

### Survey Results

- 8.5.10. The following section describes the year-on-year survey results from the Chattenden Woods and Lodge Hill SSSI Nightingale habitats. All surveys were undertaken by the BTO.
- 8.5.11. Between 2012 and 2018 the SSSI averaged 68 Nightingale territories per year in the Study Area. In 2022, a total of 139 Nightingale territories was recorded. This total was the highest ever recorded for the site (the lowest was 61 territories in 2015). This indicates a relatively stable population from 2013 onward (following the previous peak count in 2012); with a considerable increase from 2018 to 2024 (with recent 2025 data indicating a new high of 156 territories present). It is likely that this increase can be partially attributed to the active woodland management that Homes England had begun to implement during this period.
- 8.5.12. The territory distribution has been reviewed for both periods, 2012-2019 and 2020-2024. Within this timeframe there was a general movement northerly to three core areas, each of which have shown an increase in the density of birds, alongside an increased overall population. These trends strongly suggest a general movement in distribution of territories across the SSSI towards habitat of the highest quality for Nightingales.
- 8.5.13. The most marked concentration of Nightingale territories is now within the low-lying habitat mosaic present in the Ex-Training Area (to the very north/north-east of the Lodge Hill estate). This area provides a combination of mixed-age scrub with varied structural heterogeneity, areas of bare ground and a unique combination of wet-dry habitat interfaces, situated adjacent to more mature patches of deciduous woodland. Additionally, two other hotspot clusters are present at Rough Shaw (dense scrub on sloping ground to the north of the SSSI) and Bingham Roughs (within an area of formerly managed woodland) to the western extent of the SSSI (outside Homes England ownership). Chattenden Barracks and the immediate surroundings does hold some Nightingale territories (less than 10) as the existing conditions for habitat availability is much more limited on the previously developed site. In



addition, each of the three hotspot areas are a considerable distance (>1-1.5km) away from the Chattenden Barracks.

8.5.14. More detailed territory data will become available as part of the Chattenden Barracks OPA.

## 8.6 APPENDIX 8.6 – ECOLOGICAL ENGAGEMENT

- 8.6.1. This appended note includes further detail on the additional engagement undertaken with relevant ecological stakeholders. This engagement has been used to understand how impacts on the SSSI can be quantified and to inform how Homes England has sought to apply the mitigation hierarchy set out in Paragraph 193 of the NPPF.

### NATURAL ENGLAND

- 8.6.2. Homes England has undertaken extensive and structured engagement with Natural England to look to address potential ecological impacts associated with development at Chattenden Barracks, particularly in relation to the Chattenden Woods and Lodge Hill SSSI and its nationally significant Nightingale population. This engagement has included a series of online meetings and a detailed site walkaround – the latter enabling Natural England to directly observe the site’s context and ecological sensitivities.
- 8.6.3. This engagement has been formalised through a Discretionary Advice Service (DAS) agreement, which has enabled early and iterative input from Natural England on survey methodology, mitigation strategy, and the emerging Masterplan. As part of the DAS process, Homes England and Natural England have signed a Joint Statement of Cooperation, which sets out a shared commitment to collaborative working and confirms that both parties are actively engaged in resolving ecological matters in a transparent and evidence-led manner. This formal statement reflects the constructive and solution-focused nature of the engagement to date and provides a strong foundation for continued collaboration. The shared objectives are to:
- Ensure residential development at Chattenden Barracks responds positively to SSSI considerations and opportunities – considering the environmental impacts of the development and supporting emerging objectives of the Local Nature Recovery Strategy.
  - Provide positive opportunities to improve and contribute to the long-term resilience of the SSSI.
  - Explore long-term management and stewardship of parts of the SSSI.
  - Deliver the development opportunity on the least sensitive, brownfield land at Lodge Hill to meet local housing needs.
- 8.6.4. Building on this foundation, Homes England and Natural England are seeking to agree a set of assessment criteria for the forthcoming Outline Planning Application (OPA). These criteria are aligned with Medway Council’s draft Nightingale Impact Assessment (NIA), ensuring consistency with the Council’s ecological evidence and policy framework.
- 8.6.5. Throughout the DAS process, Homes England has maintained a transparent and collaborative dialogue with Natural England, sharing technical evidence and responding to feedback at each stage. These discussions have helped shape a shared understanding of the site’s ecological sensitivities and have informed the development of a mitigation and compensation strategy that reflects the site’s unique ecological context.
- 8.6.6. Homes England’s ecological strategy has been informed by survey data between 2012 and 2025 (excluding 2014) of Nightingale territory mapping, extensive habitat management across the SSSI, and a clear understanding of the site’s ecological sensitivities.
- 8.6.7. The latter stage of the DAS will focus on agreeing the wider compensation and mitigation strategy to accompany the OPA. Homes England intends to work closely with Natural England to ensure this

strategy is robust, policy-compliant, and capable of mitigating and compensating for the impacts associated with the proposed development.

### **KENT COUNTY COUNCIL (KCC)**

- 8.6.8. Homes England has held positive pre-application consultation meetings with Kent County Council on site at Chattenden Barracks and across the wider SSSI site. Homes England provided a summary of ecological baseline surveys undertaken on the site to date, as well as an outline of proposed mitigation, BNG, and off-site habitat creation proposals, which would support the proposed application, as well as a summary of ongoing SSSI management for broader context. The survey effort was confirmed as complete and no further survey requirements were considered likely following submission.
- 8.6.9. Proposals for the SSSI and ancient woodland buffer were supported, including creation of swales or SUDS with planting of scrub to create a soft but still effective buffer (for cats and human disturbance).
- 8.6.10. Nightingale compensation within Homes England's landholding was supported. The overall proposals to deliver improvements within the SSSI (as well as creation of brownfield BNG units for sale) was also considered positive but likely to require input from Natural England to ensure minimum statutory requirements for site management could be met and anything done as mitigation/compensation for development considered separately.

### **ROYAL SOCIETY FOR THE PROTECTION OF BIRDS (RSPB)**

- 8.6.11. In addition to engagement with Natural England, Homes England has also held positive and constructive discussions with the Royal Society for the Protection of Birds (RSPB). While the RSPB maintains a general position of caution regarding development within 400 metres of a Site of Special Scientific Interest (SSSI) - which, to reiterate that Homes England contends as an appropriate (applicable) buffer, Homes England has provided evidence to demonstrate that this distance-based approach is not a formal policy requirement for SSSIs under national guidance. The proposed development boundary has been drawn to avoid direct overlap with the SSSI, and a robust compensation strategy is being progressed to address potential impacts.
- 8.6.12. The RSPB has indicated a willingness to continue dialogue and technical input as the OPA progresses. This constructive engagement reflects the broader progress made in resolving ecological concerns and supports the case for allocating Chattenden Barracks within the Local Plan.

### **BRITISH TRUST FOR ORNITHOLOGY (BTO)**

- 8.6.13. Homes England has liaised with the British Trust for Ornithology (BTO) on a continued basis, who have been commissioned since 2012 to undertake annual Nightingale surveys using a standardised territory mapping methodology. The BTO's involvement has ensured consistency and scientific rigour in the data collection process.
- 8.6.14. Therefore, the insights provided by the BTO baseline data have been instrumental in shaping Homes England's habitat management strategy and informing discussions with Natural England and other stakeholders. Homes England intends to continue working with the BTO as the Outline Planning Application progresses, ensuring that the most up-to-date and site-specific ecological evidence underpins the proposed mitigation and compensation strategy.

## **MEDWAY COUNCIL**

- 8.6.15. Homes England has also engaged with Medway Council through a comprehensive Planning Performance Agreement (PPA) which has included a series of pre-application discussions and submission timetable for the OPA. More recently, there has been initial discussion on the emerging Strategic Environmental Management Scheme (SEMS) strategy. As noted in the main representations, the detailed pre-application meetings have covered a range of planning and design matters, notably meetings across Development Management matters, design workshops and more recently, discussions held around the preparation of a Design Code (the latter work still in progress). In addition, detailed discussions have taken place with Highways officers and the Masterplan is being informed by data in the process of being provided on the basis of a 450 dwelling capacity scheme.
- 8.6.16. As noted, within the framework of a DAS contract, meetings have taken (and continue to take) place with Natural England to discuss the scope and content of the OPA Nightingale Impact Assessment, and mitigation and compensation strategy. Medway Council has been made fully aware of the nature and content of these meetings throughout the pre-application engagement.
- 8.6.17. A small degree of dialogue has also been held with both Medway Council (and Natural England) around the options being explored relating to the wider landholding (incorporating parts of the CWLH SSSI set within HE's landholding to the north of the asset). Since the commencement of the Regulation 19 consultation, Medway Council has expressed interest in convening a joint workshop with Natural England, and other stakeholders to explore strategic environmental matters on the Hoo Peninsula. Homes England welcomes this move and is open to working with the Council in terms of potential future collaboration beyond of the outcome of the Chattenden Barracks OPA. Homes England reserves the right to comment further during the Local Plan process as the detail of this emerges.

## 8.7 APPENDIX 8.7 – COMPARATIVE SITE ANALYSIS

8.7.1. When reviewing the Regulation 19 Draft Local Plan, it is evident that several allocated sites have been brought forward despite close proximity to ecological designations or the presence of sensitive habitats. Homes England acknowledges that ecological constraints are a material consideration in site selection; however, the inclusion of these sites demonstrates that ecological sensitivity alone does not preclude allocation, provided that effective evidence-based mitigation and compensation strategies are in place.

8.7.2. In light of the additional evidence submitted as part of these Representations, Homes England believe that there is suitable evidence to support the allocation of Chattenden Barracks, overcoming previous ecological concerns. The following sections do not seek to undermine the feasibility of other allocated sites but instead seek to draw comparisons with the Chattenden Barracks site and examine the consistency of how the ecological impacts are being treated in each instance.

### HHH6 – LAND AT CHATTENDEN EAST

8.7.3. Homes England notes that Site HHH6 (Land at Chattenden East) has been allocated within the Regulation 19 Draft Local Plan for approximately 550 dwellings, despite its proximity to the Chattenden Woods and Lodge Hill SSSI. While the allocation is supported in principle, it is important to highlight that the ecological sensitivities of HHH6 are comparable to those of Chattenden Barracks (HHH3), particularly in relation to potential recreational pressure and indirect impacts on the SSSI and its Nightingale population.

8.7.4. The Local Plan Sustainability Appraisal (SA) is a key evidence base document that assesses individual sites. Homes England considers that there are inconsistencies in how the adjacent sites in Chattenden of HHH6 and HHH3 have been assessed. HHH6 was assigned a ‘minor negative’ impact on SSSI habitats, whereas HHH3 was assessed as having a ‘major negative’ impact. This appears to contradict the SA’s own criteria, as set out in Box E.4.2, which states that sites will have a likely ‘major impact’ when:

*Development coincides with, or is located adjacent to, an SSSI. Likelihood of direct impacts. Development is located within 400m of Lodge Hill SSSI.*

8.7.5. The document further states in the notes that:

*A 400m buffer has been applied around Lodge Hill SSSI, reflecting the sensitivity of the site to impacts on ground nesting birds and based on previous advice given by RSPB and Kent Wildlife Trust*

8.7.6. Noting our comments above about the proper application of the 400m buffer and it not appropriate for SSSI, there is an inconsistency in approach in the evidence base of this buffer being applied to sites and the assessment of their future development potential. The proximity of HHH6 to the SSSI (which is within 400m) is not acknowledged in the same level of detail as HHH3, particularly in Section F.4.2.1 of the SA, which focuses on HHH3’s potential impacts. Given that HHH6 is larger in scale and includes uses such as a new local centre and a two-form entry primary school, the potential for increased recreational pressure is arguably greater. Homes England contends that a consistent approach should have been applied to both sites.

8.7.7. Furthermore, the SA’s summary of HHH6 (Ref: Table J.1.1) does not reference ecological constraints in the ‘Outline reason for selection / rejection’ provided by Medway Council. Instead, the justification



focuses on the site's contribution to the Local Plan's vision and strategic objectives, stating: "The development would help to deliver the vision and the strategic objectives of the new Local Plan. Opportunity for sustainable development, supporting improved services." This suggests that the site's role in delivering housing and infrastructure has been prioritised over its ecological context, which does not accord for the reasoning given to dismiss Chattenden Barracks which sits across the road.

- 8.7.8. The inclusion of HHH6 demonstrates that the Local Plan accepts that development can proceed adjacent to the SSSI, even where detailed mitigation and design measures have not yet been fully articulated or evidenced within the supporting documents. However, unlike Chattenden Barracks, HHH6 does not benefit from the same level of ecological data or formal engagement to date with Natural England. It appears that the inclusion of HHH6 has been justified through the wider SEMs provision without the similar scrutiny of the ecological issues that caused HHH3 to be dismissed. The lack of consistency in approach calls into questions the soundness of the Plan.

### **HHH12 – LAND SOUTH OF MAIN ROAD, HOO ST WERBURGH**


- 8.7.9. HHH12 is the largest allocated site within the Hoo St Werburgh and Chattenden allocations, seeking provision for up to 1800 homes, and an additional local centre. Homes England notes that Site HHH12 has been allocated within the Regulation 19 Draft Local Plan, despite the site coinciding with the Medway Estuary and Marshes SSSI, overlapping with approximately 11.3 hectares of Ancient Woodland, and having a minor impact on priority habitats. These are significant ecological constraints, and in many respects, represent a more sensitive baseline than that of Chattenden Barracks (HHH3).
- 8.7.10. The allocation of HHH12 appears to have been made acceptable through the inclusion of Cockham Community Parkland as part of the site's mitigation strategy. This parkland, which also comprises part of the wider SEMs strategy, will likely act as a buffer between the development and the designated ecological features, reducing recreational pressure and providing habitat enhancement. This demonstrates that the Local Plan accepts that development can proceed in close proximity to nationally and internationally designated sites.
- 8.7.11. It is also notable that the SA assessed (Ref: Table F.4.1) HHH12 as having potential major negative impacts on European Sites, SSSI, and Ancient Woodland, yet these were considered capable of being mitigated. In contrast, Chattenden Barracks was assessed as having a less severe ecological impact yet was excluded from the Regulation 19 allocations. This inconsistency in the treatment of ecological constraints reinforces the case for re-evaluating HHH3 and recognising the work that has been undertaken (as set out within Section 6 of these Representations and associated Appendix) to mitigate the potential ecological impacts.



WSP House  
70 Chancery Lane  
London  
WC2A 1AF

**wsp.com**

## Model Representation Form for Local Plans

	<b>Local Plan</b> Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
---	---	---

**Name of the Local Plan to which this representation relates:**

**Medway Local Plan**

**Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025**

Email: [planning.policy@medway.gov.uk](mailto: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	<input type="text" value="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Jason"/>	<input type="text" value="Andrew"/>
Last Name	<input type="text" value="Hobbs"/>	<input type="text" value="Pepler"/>
Job Title	<input type="text" value="Senior Development Manager"/>	<input type="text" value="Director – Planning Consultancy"/>
(where relevant)		
Organisation	<input type="text" value="Homes England"/>	<input type="text" value="WSP"/>
(where relevant)		
Address Line 1	<input type="text"/>	<input type="text" value="WSP House"/>
Line 2	<input type="text"/>	<input type="text" value="70 Chancery Lane"/>
Line 3	<input type="text"/>	<input type="text" value="London"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="WC2A 1AF"/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value=""/>

(where relevant)

## Part B – Please use a separate sheet for each representation

Name or Organisation: Homes England

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"/>
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"/>	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.

Homes England has reviewed the Regulation 19 Draft Local Plan and considers that the Plan, in its current form, is unsound. It fails to meet the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF), particularly in relation to being positively prepared, justified, and effective. The Plan seeks to deliver 24,540 homes over the plan period through a blended growth strategy that prioritises brownfield land. However, it proposes a housing buffer of just 203 dwellings - less than 1%, which is extraordinarily tight and provides no meaningful contingency for under-delivery. The Plan is also heavily reliant on the delivery of complex and back-loaded strategic sites.

Despite this, the Plan omits Chattenden Barracks, a large, previously developed site in public ownership with a clear delivery trajectory. This omission undermines the robustness of the housing strategy and the credibility of the Plan's spatial approach. By allocating Chattenden Barracks, the Council would significantly improve the Plan's security in delivering its objectively assessed housing need. Homes England therefore strongly recommends that Chattenden Barracks be allocated within the Local Plan to make it sound and ensure that housing needs are met in full. As is stands, Homes England does not consider the Local Plan to be 'Sound'.

**[PLEASE SEE FULL ATTACHED REPS FOR FURTHER COMMENTARY AND DETAILS]**

(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.

Homes England is seeking to secure an allocation for Chattenden Barracks (Site: HHH3) for up to 450 homes. By allocating this site, the plan can notably increase its soundness by raising the buffer amount.

The allocation could form part of a standalone allocation, or as part of the Chattenden and Hoo St Werbergh Strategic Allocation (Policy SA8).

**[PLEASE SEE FULL ATTACHED REPS FOR FURTHER COMMENTARY AND DETAILS]**

(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:



Attendance at the hearing / inquiry for this site is important for a site of this strategic importance which has been left out of the Plan. At these sessions, a robust case can be put forward for allocating the site, along with providing additional evidence (which is being led by Medway Council relating to the wider SEMS strategy). As per the DtC this is an evolving piece of work which will be updated, and is viewed as fundamental to plan-led development across the Hoo Peninsula.

***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 2041 - Regulation 19 Consultation

---

Representations – Savills on behalf of The  
Church Commissioners for England

## Contents

<b>1. Introduction</b>	<b>1</b>
<b>2. Land East and West of Roper's Lane</b>	<b>7</b>
<b>3. Strategic Policies</b>	<b>13</b>
<b>4. Rural Settlements</b>	<b>22</b>
<b>5. Chapter Farm, Strood West</b>	<b>26</b>
<b>6. Summary &amp; Conclusions</b>	<b>30</b>
Appendix 1.0 Site Location Plan - Land West of Roper's Lane (HHH22)	31
Appendix 2.0 Site Location Plan - Land East of Roper's Lane (HHH31)	33
Appendix 3.0 Site Location Plan – Kingsnorth (HHH35)	35
Appendix 4.0 Site Location Plan – All Hallows (AS21)	37
Appendix 5.0 Site Location Plan – Lower Stoke (AS13)	39
Appendix 6.0 Site Location Plan – Mackays Court Farm (AS16)	41
Appendix 7.0 Site Location Plan – Land at The Street, Stoke (AS11)	43
Appendix 8.0 Site Location Plan – Sharnal Street, Stoke (HHH28)	45
Appendix 9.0 Site Location Plan – Burney's and Nord Court Farm	47
Appendix 10.0 Consortium Composite Masterplan – Land at Hoo and High Halstow	49
Appendix 11.0 Concept Plan – Land East and West of Roper's Lane	52
Appendix 12.0 Concept Plan – All Hallows (AS21)	54
Appendix 13.0 Transport Representations – Pell Frischmann	56

# 1. Introduction

- 1.1. These representations have been prepared by Savills on behalf of the Church Commissioners for England (the Commissioners) in response to the Regulation 19 consultation on the Medway Local Plan 2041 (MLP). The Commissioners welcome the opportunity to respond and are committed to working constructively with the Council to ensure the Plan is sound, deliverable and capable of timely implementation. In accordance with technical planning guidance, a number of the comments made by the Commissioners in these representations have been categorised as objections to the specific wording of policies to ensure that the Commissioners can be represented at the Examination in Public. However, it is important to note that the Commissioners supports the overall intention of the MLP.
- 1.2. The Commissioners is part of the Hoo Consortium and, in relation to its land at Hoo Peninsula, also rely on the representations submitted by Stantec on behalf of the Consortium. These set out the shared vision for growth at Hoo St Werburgh and the wider strategic response to the consultation.
- 1.3. In addition to the Hoo Peninsula allocations, the Commissioners' land interests extend into the Strood West area, where development proposals adjoin the administrative boundary with Gravesham Borough Council. While these representations focus on Medway's Regulation 19 Plan, they also address certain matters relevant to the cross-boundary masterplanning process for Strood West / Chapter Farm. The Commissioners reserve the right to make further, more detailed representations as part of any Gravesham-specific consultation.
- 1.4. The Commissioners strongly support the allocation of their landholdings at Land East and West of Roper's Lane (Policy SA8) and Kingsnorth (Ref. HHH35), and the allocation at The Street, Stoke (Policy SA11). Targeted modifications are proposed to ensure these policies are effective, justified and positively prepared. The Commissioners also promote additional landholdings in All Hallows (Ref. AS21), Lower Stoke (Ref. AS13), Mackays Court Farm (AS16), Sharnal Street (Ref. HHH28) and Burney's and Nord Court Farm (Ref. AS29), which could contribute further to housing supply should the Council require additional sites.
- 1.5. The locations of each of the Commissioners' landholdings are shown in Appendices 1-9.
- 1.6. The National Planning Policy Framework (NPPF) (2024) explains that the planning system should be planned. Paragraph 16 sets out the Plans should:
- a) be prepared with the objective of contributing to the achievement of sustainable development;*
  - b) be prepared positively, in a way that is aspirational but deliverable;*
  - c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
  - d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

*e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*

*f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

- 1.7. At Examination, a Plan will be found 'sound' if it is considered to be positively prepared, justified, effective and consistent with national policy, as set out within paragraph 36 of the NPPF (2024). As such, ensuring that the Local Plan meets the tests of soundness is important throughout the Local Plan process, especially at Regulation 19 stage. Throughout these representations, a number of recommendations are set out which the Commissioners consider necessary to ensure the MLP is sound. For ease of reference, these proposed amendments are summarised within blue boxes in the relevant sections, and are collated in Table 1 below.

Policy/ Document	Recommendation / Objection	Comment
SA8	Object	<p>Elements of Policy SA8 are currently not suitably justified, effective or positively prepared. The following recommendations have therefore been made to ensure the Plan is found sound:</p> <ol style="list-style-type: none"><li>1. Amend the allocation of the Land either side of Roper's Lane in Policy SA8 to 'approximately 1,880' dwellings and the plan period for delivery to '1-5, 6-10, 11-15'.</li><li>2. Clarify within Policy SA8 that a total of 1,880 homes will be delivered during this plan period on the land either side of Roper's Lane and an additional 1,320 homes will be delivered beyond 2041.</li><li>3. Amend Figure 14 of the MLP to accurately reflect the Hells Angels land in the Concept Plan.</li><li>4. Reconsider the location of the secondary school in Figure 14 of the MLP and provide further information in regard to forward funding to enable an early delivery.</li><li>5. Any safeguarded provision for a railway station should be limited to circumstances where it can be demonstrated to be justified and deliverable, consistent with the Council's evidence base. In the absence of such evidence, the allocation should focus on delivering alternative sustainable transport measures in the early phases of development.</li><li>6. Ensure that all sites benefitting from the strategic infrastructure improvements contribute to the IDP.</li><li>7. Amend Criterion 16 of Policy SA8 of the MLP to separate the different environmental considerations and provide further clarity for decision makers on how they should consider applications in regard to a Strategic Environmental Framework.</li></ol>



## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

		<p>8. In Policy SA8, provide further clarity in regard to the Green Infrastructure Strategy, in relation to: timeframes; contents, status and compatibility with other supplementary planning documents.</p> <p>9. Development should be guided by the Concept Plan in Policy SA8 instead of incorporating additional complication through the introduction of a Hoo Planning Framework and Strategic Masterplan Development Framework. Should this Framework be progressed, further clarity is required in regard to the Hoo Planning Framework and Strategic Masterplan Development Framework, in relation to: timeframes; contents and status.</p>
Vision and Strategic Objectives	Support	The Commissioners supports the provision of varying types of homes to meet the demand in Medway and to strengthen Medway's regional economic role.
Spatial Development Strategy	Object	<p>In order for the Spatial Development Strategy to be found justified and consistent with national policy, the following recommendations have been made:</p> <ol style="list-style-type: none"> <li>1. Amend the Spatial Development Strategy of the MLP to remove reference to any land being safeguarded for a potential railway station in the Hoo Peninsula due to an insufficient evidence base.</li> <li>2. Include the housing requirement for Medway Council and the proposed trajectory for meeting it in the strategic housing policy of the MLP.</li> </ol>
North West Policies Map	Object	In order for the Policies Map to be found justified and effective, it is recommended that Medway Council removes the safeguarded transport land in site allocations HHH22 and HHH31 on the North West Policies Map. The land is already indicatively shown in Figure 14 of the MLP and does not require duplication in policy.
S2	Object	<p>The following recommendations have been made for Policy S2:</p> <ol style="list-style-type: none"> <li>1. Provide further clarity in regard to the Hoo Peninsula Strategic Environmental Programme, in relation to: timeframes; contents and interaction with live planning applications.</li> <li>2. Amend Policy S2 to ensure consistency between the Hoo Peninsula Strategic Environmental Programme and the emerging Kent and Medway Local Nature Recovery Strategy.</li> </ol>
S10	Support	The Commissioners supports the allocation of site HHH35 for employment use.
T3	Object	To ensure Policy T3 is positively prepared, the following recommendations have been made:

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

		<ol style="list-style-type: none"> <li>1. Policy T3 requires amendment to clarify that a lower level of affordable housing would be acceptable should the viability assessment demonstrate the policy level provision is not achievable.</li> <li>2. Clarification is required in Policy T3 as to whether all PDL sites require 10% affordable housing provision or just PDL sites in lower value areas.</li> <li>3. Medway Council should allocate more greenfield sites in order to prevent a shortfall of affordable housing provision should this be a concern for the Council.</li> <li>4. The different value areas referred to in Policy T3 should be clearly defined and mapped in the MLP to avoid any ambiguity.</li> </ol>
T9	Object	It is recommended that Policy T9 is amended to remove the requirement to offer unsold custom and self-build plots to the local authority for affordable housing and instead allow the unsold plots to be returned to the developer as market housing.
S22	Object	Policy S22 requires amendments to provide further clarity relating to: the location of the centres; the proposed phasing of the centres; the funding plan; the evidence base to inform the specific service needs; and consistency with Figure 14 of the MLP.
DM17	Object	<p>To ensure Policy DM17 is justified, the following recommendations have been made:</p> <ol style="list-style-type: none"> <li>1. Medway Council should reconsider the need for land to be safeguarded for a potential railway station on the Land East of Roper's Lane.</li> <li>2. Should there prove to be a demonstrable need and suitable mechanism for the delivery of a railway station on the Land East of Roper's Lane, then a fall back position should be introduced in Policy DM17 to allow alternative land uses should the railways station not be delivered within a reasonable timeframe.</li> </ol>
SA11	Support	<p>The Commissioners supports the allocation of the Land at The Street, Stoke for up to 10 homes.</p> <p>Should Medway Council require any additional residential sites to meet its housing needs or support further development on small sites, sites AS13, AS16, AS21, AS29 and HHH28 are all available, suitable and achievable for residential development.</p>
SA6	Object	<p>To ensure that Policy SA6 is justified, the following recommendations have been made:</p> <ol style="list-style-type: none"> <li>1. Amend Figure 12 of the MLP to remove the heritage buffer proposed in the Land West of Strood Concept Plan.</li> </ol>

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

		<ol style="list-style-type: none"><li>2. Amend the key to Figure 12 to clarify that the breaks in built form will comprise green space and planting.</li><li>3. Provide evidence to justify the need for an 8-FE secondary school to be delivered on the Land West of Strood.</li></ol>
SA14	Object	To ensure that the MLP is positively prepared, it is recommended that Policy SA14 is amended so that site HHH35 can be delivered earlier in the plan period and is not reliant on the delivery or occupation of any previously developed land.

*Table 1 – Summary of the Commissioners' representations*

#### The Church Commissioners for England

- 1.8. The Commissioners has been supporting the work of the Church of England since 1948 when it was founded following the merging of Queen Anne's Bounty (supporting poorer clergy) and the Ecclesiastical Commissioners (administers to several functions of the church). As a registered charity (charity number 1140097), the Commissioners support the work and mission of the Church of England by facilitating growth and mission work through its sustainable approach to ethical and responsible investments.
- 1.9. The Strategic Land team at the Commissioners bring forward land for new, high-quality developments across the country. The Commissioners' aim is to deliver new homes and employment opportunities which support and enhance their local surroundings. This is achieved by seeking to build new, and strengthen existing, communities, helping to create and sustain vibrant and vital places. The Commissioners has key strategic objectives which seek to:
- Deliver, across England, high-quality, safe and stable new homes and communities, focused on those areas with identified housing and employment need, or with specified growth aspirations.
  - Provide high quality placemaking and thorough engagement with local churches and dioceses, local authorities and existing communities.
  - Seek to embed environmental, social and governance (ESG) matters into their work.
  - Curate sustainable new developments that seek to support, enhance, integrate with and celebrate their surrounding communities and landscapes, over the long term.
  - Support strong links to vital community services and facilities, recreation areas, walking and cycling links and public transport.
- 1.10. The Commissioners is committed to remaining at the forefront of responsible investment and is frequently recognised as a global leader in the field. In 2020, the Commissioners was included in the UN-supported Principles for responsible investment's 'Leaders Group' for the second year running, one of just 16 asset owners globally to be recognised for their leadership in responsible investment.

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

- 1.11. The integration of material Environmental, Social and Governance (ESG) factors into the Commissioners' decision making has long been the cornerstone of its investment approach. Whilst an emphasis on sustainability has always been embedded within the Commissioners' work, the Commissioners has recognised the need to formalise its approach to be in a position to measure the portfolio's performance. The Commissioners has therefore committed to developing an ESG Framework for the Strategic Land portfolio.

#### Structure of Representation

- 1.12. The structure of these representations is as follows:
- **Section 2** will review and comment on the Land East and West of Roper's Lane and provide recommendations on Policy SA8;
  - **Section 3** will review and comment on the strategic policies of the MLP;
  - **Section 4** will review and comment on the Land at The Street, Stoke and Policy SA11 of the MLP;
  - **Section 5** will review and comment on the Land at Chapter Farm and provide recommendations on Policy SA6;
  - **Section 6** will summarise and conclude these representations.

#### Additional Documents

- 1.13. A number of documents have been submitted in conjunction with these representations. These are listed below:
- *Hoo Consortium Composite Masterplan for Land at Hoo and High Halstow (Appendix 10)*
  - *Indicative Concept Plan for Land East and West of Roper's Lane and Kingsnorth, C&W (Appendix 11)*
  - *All Hallows Indicative Concept Plan (Appendix 12)*
  - *Pell Frischmann Transport Representations (Appendix 13)*

## 2. Land East and West of Roper's Lane

### Site Background

- 2.1. The Commissioners own around 230ha of land to the east and west of Ropers Lane on the east of Hoo St Werburgh. As evidenced through the Hoo Consortium Masterplan and representations to the Regulation 18A and 18B Medway Local Plan consultations, the site is able to sustainably deliver up to 3,200 homes, in conjunction with employment, education and retail use. The site would form a logical extension to existing the existing town of Hoo and deliver important new community infrastructure, in addition to residential dwellings.
- 2.2. Significant technical work has been undertaken during the course of the site's promotion. This technical work has informed the masterplanning process for the site and underpins the concept masterplan submitted by the Hoo Consortium and shown in Appendix 10. Therefore, the Commissioners' proposals are justified by a substantial evidence base. This technical work includes:
- Landscape and Visual Appraisal (May 2014)
  - Landscape and Visual Impact Assessment (January 2023)
  - Initial Observations – Feasibility – Transport, Utilities, Drainage, Flood Risk (June 2020)
  - Utilities Consultation (September 2020)
  - Heritage Review of Hoo Stop Line (March 2022)
  - Heritage DBA (January 2023)
  - Agricultural Land Classification Report (February 2015, January 2023)
  - Medway Council Political Audit (May 2014)
  - Ecological Constraints Report (Ecological walkover) (May 2024)
  - Designated Sites Impact Assessment (October 2016)
  - Great Crested Newt Survey Report (July 2018)
  - Bat Roost Survey Report (November 2018)
  - Reptile Survey Report (November 2018)
  - Breeding Bird Survey Report (December 2018)
  - Wintering Bird Survey (September 2019, March 2024)
  - Ecological Assessment (August 2020, October 2021, January 2023)
- 2.3. The evidence base confirms that the site is capable of sustainably accommodating up to 3,200 homes alongside employment and education uses. Further technical work, undertaken in collaboration with the Hoo Consortium (of which the Commissioners is a major stakeholder), supports this conclusion. As set out in the Consortium's representations, delivering 3,200 homes is both sustainable and essential to securing the funding necessary for the significant infrastructure required across the Hoo Peninsula. Based on this combined technical work, it is considered that 1,880 homes can be delivered during this plan period, with the remaining homes delivered beyond 2041.



## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

#### **Policy SA8: Hoo St Werburgh and Chattenden - Object (Not justified nor effective)**

- 2.4. The Commissioners strongly supports the allocation of Land East and West of Roper's Lane (Policy SA8) and Kingsnorth (Ref. HHH35). The sites are available, suitable and deliverable, and will make a significant contribution to Medway's housing and employment needs. A small number of targeted modifications are recommended to ensure the policies are clear, deliverable and aligned with national policy, including clarifying the quantum of development proposed in the plan period and beyond; refining the Concept Plan and Policies Map to reflect site constraints; and reviewing the approach to key infrastructure delivery.

#### ***Quantum of Development***

- 2.5. Policy SA8 allocates the land either side of Roper's Lane for "up to 1,700" homes within the plan period. As set out earlier in these representations, the Commissioners' evidence demonstrates that the site can sustainably deliver approximately 1,880 homes across the plan period, a figure previously shared with Medway Council through the Hoo Consortium Housing Trajectory.

- 2.6. It is not expected that all 3,200 homes will be delivered within this plan period. However, the current wording of Policy SA8 — "1,700 dwellings over 1–15+ years" — could be read as capping total capacity on both sites at 1,700 dwellings, including beyond the plan period. To ensure the policy is effective and avoids misinterpretation, the quantum of development for this plan period should be amended to 1,880 homes, and the delivery rate expressed clearly within the plan period.

- 2.7. Paragraph 16(d) of the NPPF (2024) states that Plan should:

*"contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals".*

- 2.8. Policy SA8 therefore requires rewording to ensure that the policy is clear and unambiguous in accordance with paragraph 16(d) of the NPPF.

- 2.9. Paragraph 22 of the NPPF (2024) states that:

*"Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery."*

- 2.10. The critical mass of housing required to support Medway Council's proposed infrastructure across the Hoo Peninsula is 3,200 homes on the Commissioners' land either side of Roper's Lane and this will require a phased delivery beyond this plan period. It is therefore recommended that in accordance with paragraph 22 of the NPPF (2024), the MLP clearly states Medway Council's plan for 1,880 homes to be delivered in this plan period and an additional 1,320 homes to come forward beyond this plan period.

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

**Proposed Amendment 1 – Amend the allocation of the Land either side of Roper’s Lane in Policy SA8 to ‘approximately 1,880 dwellings’ and the plan period for delivery to ‘1-5, 6-10, 11-15’.**

**Proposed Amendment 2 – Amend Policy SA8 to clarify that the Land either side of Roper’s Lane is planned for 3,200 homes and that this will be delivered in a phased approach of 1,880 homes in this plan period and a further 1,320 homes beyond 2041.**

#### ***Hells Angels Kent***

- 2.11. Figure 14 of the MLP comprises a Concept Plan for the Hoo St Werburgh and Chattenden area. This Concept Plan appears to assume the relocation of the Hells Angels Clubhouse, which is located in the central area of the land west of Roper’s Lane, and allocates the site as proposed open space.
- 2.12. Hells Angels Kent are the freehold owners of land at Angel Farm within the allocation boundary and there is no agreement in place for their relocation. This matter cannot currently be facilitated by the Commissioners. Unless the Council intends to secure an alternative arrangement directly with Hells Angels Kent, the allocation and Concept Plan should acknowledge the presence of their land and ensure that any design response incorporates an appropriate buffer.
- 2.13. Paragraph 16(c) of the NPPF (2024) states that Local Plans should:
- “be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees,”*
- 2.14. Despite early engagement with the Commissioners, Medway Council has not implemented appropriate consideration of existing local organisations into the proposed Concept Plan in accordance with paragraph 16(c) of the NPPF (2024). Therefore, Figure 14 requires amendment to remove the Hells Angels land ownership from the allocation and incorporate a suitable development buffer. The correct red line is shown in the site location plan, included at Appendix 1.

**Proposed Amendment 3 – Amend Figure 14 of the MLP to remove the Hells Angels ownership from the proposed development in the Concept Plan, in accordance with the red line shown at Appendix 1.**

#### ***Secondary School***

- 2.15. A new six-form entry secondary school is proposed on the Land West of Roper’s Lane. The Commissioners will make the land available and would welcome further discussions with the Council on the most appropriate mechanism for securing its delivery..

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

- 2.16. The Commissioners notes the Council's intention for the early delivery of the secondary school and recommends reviewing the proposed location to ensure it can be brought forward in line with demand and infrastructure provision. The Commissioners would be pleased to work with the Council to explore delivery options, including forward funding arrangements, to ensure the school is deliverable within the intended timescales.

**Proposed Amendment 4 – Reconsider the location of the secondary school in Figure 14 of the MLP and provide further information in regard to forward funding to enable an early delivery.**

#### *Railway Station*

- 2.17. The Concept Plan in Figure 14 identifies an indicative area of the site as "safeguarding of land for potential railway station". The Commissioners considers that, if retained, any such provision should be limited by a clear time period for delivery, after which the land would revert to other uses.
- 2.18. Given there is currently no certainty over demand, funding or deliverability of a station in this location within the plan period, the policy should not safeguard the land indefinitely. Reasonable alternatives, such as a strategic bus network, have been identified by Pell Frischmann and should be considered as more deliverable options.

**Proposed Amendment 5 – The Commissioners considers that any safeguarded provision for a railway station should be limited to circumstances where it can be demonstrated to be justified and deliverable, consistent with the Council's evidence base. In the absence of such evidence, the allocation should focus on delivering alternative sustainable transport measures in the early phases of development.**

#### *Infrastructure Delivery Plan (IDP)*

- 2.19. The Commissioners supports the MLP's focus on delivering the infrastructure necessary to support growth. To ensure deliverability, it will be important that all beneficiaries of strategic infrastructure contribute proportionately, that cost assumptions are robust and up-to-date, and that clear timeframes are provided for key items such as the Hoo Peninsula Strategic Environmental Programme.

**Proposed Amendment 6 – Ensure that all sites benefitting from the strategic infrastructure improvements contribute to the IDP.**

#### *Strategic Environmental Framework*

- 2.20. The Commissioners support the focus on landscape-led development and the protection of sensitive habitats in Policy SA8. For clarity and ease of application, Criterion 16 would benefit from separating out

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

the different environmental considerations it covers — such as landscape, drainage, environmental mitigation and biodiversity net gain — rather than merging them into a single, wide-ranging requirement.

- 2.21. Clear guidance should also be provided on how any Strategic Environmental Framework will apply to schemes with extant or submitted planning applications, to ensure consistency with national policy and avoid uncertainty for decision-makers.
- 2.22. It is also noted that there is a minor formatting error in the second sentence of Criterion 19 of Policy SA8 which should be corrected.

**Proposed Amendment 7 – Amend Criterion 16 of Policy SA8 of the MLP to separate the different environmental considerations and provide further clarity for decision makers on how they should consider applications in regard to a Strategic Environmental Framework.**

#### ***Green Infrastructure Strategy***

- 2.23. Criterion 17 of Policy SA8 states that:
- “A green infrastructure strategy will inform the design of development, reflecting the neighbourhood approach, and providing connections to surrounding rural area. This will draw on the area’s heritage, providing a long-term management plan for historic assets.”*
- 2.24. As with the proposed Strategic Environmental Framework, it is unclear how a Green Infrastructure Strategy would apply to sites with planning consent or live applications. No publication or adoption timetable is provided, creating a risk of delay to delivery of the allocations in Policy SA8.
- 2.25. There is also no clarity on how a Green Infrastructure Strategy would interact with the Strategic Environmental Framework or the Strategic Masterplan Development Framework. These documents appear to address similar themes, and the introduction of additional approval stages could create unnecessary layers of process that delay development.

**Proposed Amendment 8 – In Policy SA8, provide further clarity in regard to the Green Infrastructure Strategy, in relation to: timeframes; contents, status and compatibility with other supplementary planning documents.**

#### ***Hoo Planning Framework and Strategic Masterplan Development Framework***

- 2.26. Policy SA8 makes several references to a Strategic Masterplan Development Framework, but provides no detail on production or publication timeframes. Without this clarity, there is a risk of delay to the delivery of allocated sites and associated strategic infrastructure.
- 2.27. Criterion 5 of Policy SA8 states that the masterplan will provide:

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

*“a framework for design, landscape and green infrastructure, heritage, services, employment, transport, infrastructure, defining distinctive neighbourhoods and centres.”*

- 2.28. It is unclear what status such a document would hold, whether it would be supported by written text or evidence, or how it would interact with determined or live planning applications. This uncertainty should be addressed to ensure the policy is effective.
- 2.29. Given the advanced progress of approved and live planning applications across the Hoo Peninsula, the Commissioners questions the added value of a Strategic Masterplan Development Framework. Figure 14, once updated to reflect these representations and the Consortium masterplan, should be sufficient to guide development, with detailed design matters addressed through the planning application process.
- 2.30. Criterion 20, relating to the delivery of a district heating network, duplicates matters already addressed in Policy T41. As such, it should be deleted from Policy SA8 to avoid unnecessary repetition and additional procedural requirements.
- 2.31. There is a minor formatting error in Policy SA8 where the “Subsequent Design Principles” is numbered as section 3, despite following section 21. This should be corrected to avoid misinterpretation, in accordance with paragraph 16(d) of the NPPF (2024).

**Proposed Amendment 9 – Development should be guided by the Concept Plan in Policy SA8 instead of incorporating additional complication through the introduction of a Hoo Planning Framework and Strategic Masterplan Development Framework. Should this Framework be progressed, further clarity is required in regard to the Hoo Planning Framework and Strategic Masterplan Development Framework, in relation to: timeframes; contents and status.**

#### Suitability of the Site

- 2.32. The Commissioners considers the land east and west of Roper's Lane to be suitable for large-scale strategic development. Technical work undertaken across the site demonstrates that it can sustainably deliver up to 3,200 homes, together with a secondary school, community centre, employment space and retail provision.
- 2.33. The site is integral to the delivery of the Medway Local Plan, providing substantial community and education facilities alongside significant financial contributions through the Infrastructure Delivery Plan. It will make a major contribution to meeting housing needs in Medway and neighbouring authorities. To ensure viability and the timely delivery of strategic infrastructure, the site should be allocated for approximately 1,880 homes within this plan period, with the balance of up to 3,200 homes delivered beyond the plan period.



## 3. Strategic Policies

- 3.1. Comments have been made on behalf of the Commissioners on a number of themes and policies in the MLP. These comments are outlined below, with the component representation outlined as a 'Recommendation'.

### **Vision and Strategic Objectives - Support**

- 3.2. The Commissioners broadly supports the vision and strategic objectives outlined in the MLP. In particular, the Commissioners supports the objectives to:

*“Provide for homes of varying types to meet demand in Medway and ensure a cohesive sustainable approach. To deliver high quality energy efficient homes that meet the housing needs of Medway’s communities, reflecting the requirement for affordable housing and the range of sizes and types the area needs...”*

And

*“To strengthen Medway’s regional economic role through boosting the performance of the local economy by supporting local businesses to grow and innovate; and attracting inward investment and re-locations, through the provision of a portfolio of good quality employment land that meets the needs of businesses; and to secure and extend higher value employment opportunities; and reduce out-commuting.”*

- 3.3. The allocation of the Commissioners’ landholdings across Medway will support the MLP strategic objectives by providing suitable, available and achievable sites to meet the housing and employment needs of the authority. In particular, the co-location of residential and employment use on the Land East of Roper’s Lane encourages sustainable travel and reduces commuting distances.
- 3.4. The Commissioners also support Medway Council’s objective to provide appropriately phased infrastructure to support the needs of the proposed housing and economic development. This is entirely achievable, but does rely on establishing a critical mass of housing and employment development to ensure appropriate viability. The proposed phasing and funding of the strategic infrastructure will need to be set out in an IDP and be supported by an appropriate evidence base. The Commissioners understands the Council is advised to explore alternative upfront sources of funding to facilitate the early delivery of infrastructure, with the cost recouped by subsequent S106 payments. This is a proposal that the Commissioners support.

### **Spatial Development Strategy – Object (Not justified)**

#### ***Hoo Peninsula***

- 3.5. The Commissioners supports the Council’s proposed large-scale expansion of key suburban neighbourhoods and villages such as Hoo St Werburgh and land west of Strood. It is also recognised that strategic masterplans will be required to ensure the delivery of cohesive and sustainable development.

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

However, as mentioned previously, further information is required in relation to the content, timeframes and status of such documents.

- 3.6. The Commissioners also supports the allocation of Hoo St Werburgh as the principle settlement on the Hoo Peninsula and the vision for a thriving community, supported by a good range of services, including retail, schools, health, sports and community facilities. The Commissioners agrees that due the large scale of the proposed development and infrastructure, the planned growth of Hoo will extend beyond this plan period. However, as discussed previously, further clarity is required in relation to the scale of development that the Council expects to come forward during this plan period. This clarification needs to be embedded in Policy SA8 of the MLP.
- 3.7. The MLP's Spatial Development Strategy discusses the safeguarding of land for the delivery of a passenger rail service connecting the Hoo Peninsula to the North Kent services. The Commissioners objects to this proposal of safeguarding land on its site East of Roper's Lane. There is insufficient evidence to demonstrate the need or feasibility of such a rail service and its proposal conflicts with the substantial technical work undertaken by Pell Frischmann (see **Appendix 14**).

**Proposed Amendment 10 – Amend the Spatial Development Strategy of the MLP to remove reference to land being safeguarded for a potential railway station in the Hoo Peninsula due to an insufficient evidence base.**

#### ***Housing Requirement***

- 3.8. The MLP states that the proposed spatial strategy will fully meet the objectively assessed housing needs of the local authority. The Commissioners supports this commitment to housing delivery. However, it is recommended that Medway Council's housing commitment should be clearly articulated within a strategic policy, accompanied by a housing strategy showing the expected annual housing delivery across the plan period.
- 3.9. Paragraph 78 of the NPPF (2024) states that:
- “Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites...”*
- 3.10. Although paragraph 6.1.2 of the MLP sets out the Council's housing requirement of 1,636 dwellings per annum (24,540 over the plan period), this commitment is not presented as a strategic policy. To comply with paragraph 78 of the NPPF and to provide clearer guidance for decision-makers, it is recommended that both the housing requirement and proposed housing trajectory are set out within a strategic policy of the MLP. This evidence is certainly needed ahead of the forthcoming MLP Examination.

**Proposed Amendment 11 – Include Medway Council's housing requirement and proposed housing trajectory within a strategic policy of the MLP.**

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

#### **Policies Map – Object (Not justified or effective)**

##### ***North West Policies Map***

- 3.11. The Commissioners strongly supports the residential-led allocation of sites of HHH22, HHH31 and AS11, in addition to the employment-led allocation of site HHH35.
- 3.12. However, the Commissioners objects to area of 'safeguarded land for transport scheme' which covers a substantial part of the Land East of Roper's Lane. No evidence is provided for the location or positioning of this safeguarded land and there remains a lack of justifiable need. The proposed safeguarding in the North West Policies Map also conflicts with the Concept Plan shown in Figure 14 of the MLP. This creates confusion for the decision maker as to the weighting of conflicting policies within the MLP and contradicts paragraph 16(d) of the NPPF (2024) which requires plans to be clear and unambiguous.
- 3.13. The safeguarded land shown in the North West Policies Map would impede a significant proportion of the Land East of Roper's Lane for residential development. By reducing the quantum of residential development deliverable on the Commissioners' land, this is likely to have adverse viability consequences in relation to the delivery of strategic infrastructure across the Hoo Peninsula.
- 3.14. Since the safeguarded land is already shown indicatively in Figure 14 of the MLP, the land should be removed from the policies map to avoid conflict and duplication of policy. Development will be guided by the Concept Plan shown in Figure 14 and design detail progressed through the planning application process.

**Proposed Amendment 12 – Remove the safeguarded transport land in site allocations HHH22 and HHH31 on the North West Policies Map. The land is already indicatively shown in Figure 14 of the MLP and does not require duplication in policy.**

#### **Policy S2: Conservation and Enhancement of the Natural Environment – Object (Not justified or effective)**

##### ***Hoo Peninsula Strategic Environmental Programme***

- 3.15. The Commissioners supports Medway Council's strong commitment to improving the environment and creating strategic objectives. However, the Commissioners wish to raise a few comments.
- 3.16. Policy S2 states:

*"A coordinated programme of evidence-based measures will include land management and habitat restoration and creation, buffers to sensitive sites, securing the landscape, a nature-based approach to flood and water management, education and wardening, and provision of recreational resources away from sensitive locations. Developers of sites on the Hoo Peninsula will be required to contribute to the implementation of the strategic environmental programme, proportionate to the scale and nature of the development, and its proximity to sensitive sites."*

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

- 3.17. Further information is required in relation to the timescales expected for the preparation and publication of a Strategic Environmental Programme and how it will interact with live and determined planning applications. This is particularly pertinent due to the number of live planning applications which have already been submitted across the Hoo Peninsula. Further clarity is also sought into the consultation process for a Strategic Environmental Programme and the level of engagement that developers and landowners can have in its production.
- 3.18. The Commissioners note that there is no reference to Local Nature Recovery Strategies (LNRS) in relation to the Hoo Peninsula Strategic Environmental Programme. It is recommended that the Strategic Environmental Programme is prepared in collaboration with the Kent and Medway LNRS to ensure *consistency with national policy* and to avoid any conflicting policies on a local or strategic level.

**Proposed Amendment 13 – In Policy S2, provide further clarity in regard to the Hoo Peninsula Strategic Environmental Programme, in relation to: timeframes; contents and interaction with live planning applications.**

**Proposed Amendment 14 – Amend Policy S2 to ensure consistency between the Hoo Peninsula Strategic Environmental Programme and the emerging Kent and Medway Local Nature Recovery Strategy.**

#### **Policy T3: Affordable Housing – Object (Not positively prepared)**

- 3.19. Policy T3 requires:
- *“In high value areas, including the Hoo Peninsula strategic sites and suburban greenfield sites, 30% of all residential units proposed.*
  - *In lower value areas, 25% of all dwellings proposed in greenfield areas, and 10% of all residential units proposed on previously developed land.*
  - *In line with the Planning Practice Guidance, it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.”*
- 3.20. The Commissioners is aware of the need for affordable homes across the authority and its land will comprise a significant proportion of the affordable housing delivered on the Hoo Peninsula.
- 3.21. Policy T3 also states that:
- “A viability assessment in line with national policy and guidance should be submitted to the Council to be independently verified if the affordable housing proposed does not meet that which is required.”*
- 3.22. The Commissioners supports the element of flexibility incorporated into Policy T3 in relation to the provision of affordable housing in line with national policy and local circumstances. This flexibility is essential considering the significant viability challenges faced by some sites, particularly those in lower-value areas on previously developed land. Medway Council’s Viability Assessment indicates that in some locations, development is not viable even without the provision of affordable housing. The allocation of brownfield

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

sites with affordable housing exceptions, highlights the need for additional site allocations to compensate for the limited affordable housing that is likely to be delivered across the District.

- 3.23. Medway Council's Viability Assessment indicates that many of the sites allocated in the Local Plan will struggle to deliver affordable housing, primarily due to the high infrastructure contributions required by the Council. Medway Council's existing Local Plan was adopted in 2003. Therefore, the MLP is attempting to address a 22-year shortfall in planned strategic infrastructure, resulting in the substantial infrastructure contributions for developers. As a result of these high infrastructure contributions and reliance on brownfield sites, the MLP is likely to under-deliver on the required number of affordable homes needed to meet the Council's assessed needs.
- 3.24. The Commissioners acknowledges the importance of allocating a range of brownfield sites but recommends that the Council should also consider allocating more greenfield sites. This is required to ensure the required strategic infrastructure and affordable housing is successfully delivered during the proposed plan period.
- 3.25. The Commissioners owns a range of greenfield sites (All Hallows (Ref. AS21), Lower Stoke (Ref. AS13), Sharnal Street (Ref. HHH28) and Burney's and Nord Court Farm (Ref. AS29)) across the Hoo Peninsula, all of which are suitable, available and achievable for residential development. The allocation of these greenfield sites could contribute to the Council's overall housing need, provide a buffer for housing supply, support the delivery of infrastructure, affordable housing, and offset the limited infrastructure contributions from brownfield sites.
- 3.26. Policy T3 requires further elaboration that a lower level of affordable housing would be acceptable should a site's viability assessment demonstrate that the policy compliant affordable housing provision is not achievable.
- 3.27. The wording of Policy T3 is ambiguous and may lead to confusion for both applicants and decision-makers. Paragraph 16 of the NPPF emphasises the need for policies to be written clearly and unambiguously. However, the second bullet point of Policy T3 does not clarify whether the 10% affordable housing requirement applies universally to all residential development on previously developed land (PDL), or only to those located in lower-value areas. To address this uncertainty, the Commissioners recommends introducing a separate bullet point that explicitly outlines the affordable housing requirements for PDL sites.



## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

- 3.28. Policy T3 makes reference to different value areas across the administrative boundaries of Medway Council. However, these areas are not defined or mapped anywhere in the MLP and instead rely on the Viability Assessment which could be revised without proper scrutiny, unlike a strategic policy of the MLP. To avoid ambiguity for a decision-maker over which value area a site is located in, the Commissioners recommends that these value areas should be formally defined and included in the MLP.

**Proposed Amendment 15 – Policy T3 requires amendment to clarify that a lower level of affordable housing would be acceptable should the viability assessment demonstrate the policy level provision is not achievable.**

**Proposed Amendment 16 – Clarification is required in Policy T3 as to whether all PDL sites require 10% affordable housing provision or just PDL sites in lower value areas.**

**Proposed Amendment 17 – Medway Council should allocate more greenfield sites in order to prevent a shortfall of affordable housing provision should this be a concern for the Council.**

**Proposed Amendment 18 – The different value areas referred to in Policy T3 should be clearly defined and mapped in the MLP to avoid any ambiguity.**

#### **Policy T9: Self Build and Custom Housebuilding – Object (Not justified)**

- 3.29. The final part of Policy T9 states that:

*“If any plot(s) remain unsold after being marketed for the minimum period, they can either remain for sale as a self/custom build plot or be offered to the Local Authority to acquire for the provision of affordable housing (separate from any relevant affordable housing requirement for the Development as applicable), before reverting back to the land owner to build out on the plot or sell without restriction. To prevent the delay of housing delivery, the Local Authority will be given a time period of three months to acquire the vacant plot(s). This provision will be secured as part of the original Section 106 agreement.”*

- 3.30. No evidence or justification is provided as to why any unsold plots should be offered to the Council for affordable housing or continued to be marketed for longer than 12 months. These plots were intended and designed to be market housing and should therefore revert back to the developer after the formal marketing period ends.

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

- 3.31. The Commissioners therefore recommends that Policy T9 is amended and the final bullet point removed. Instead, Policy T9 should clearly set out that following the end of the marketing period, any unsold plots should be returned to the developer.

**Proposed Amendment 19 – Amend Policy T9 to remove the requirement to offer unsold plots to the local authority for affordable housing and instead allow the unsold plots to be returned to the developer as market housing.**

#### **Policy S10: Economic Strategy - Support**

- 3.32. Local Authorities have a duty to set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for a range of uses, including employment (NPPF, paragraph 20). Planning policies should also help to create the conditions in which businesses can invest, expand and adapt (NPPF, paragraph 85).
- 3.33. The Commissioners supports the proposed employment use on its land adjacent to the existing Kingsnorth employment area. The site comprises a sustainable location adjacent to existing employment use and will support the delivery of the proposed residential development. The site (HHH35) is suitable and available for employment use and could accommodate between 157,000sqm & 176,000sqm of floorspace, split between B2, B8 and E uses, delivered in the short term.

#### **Policy SA14: Employment Sites – Object**

- 3.34. The Commissioners supports the allocation of the Kingsnorth Expansion Area for a range of employment land uses in the MLP.
- 3.35. Criterion 4 of Policy SA14 states that:
- “Kingsnorth Expansion Area is anticipated to be developed during the latter part of the plan period, i.e. after employment sites on previously developed land have been occupied.  
c. Kingsnorth Expansion Area (HHH35) will have regard to the Frindsbury Peninsula Planning Framework concerning the managed release and relocation of existing businesses at MCE.”*
- 3.36. The allocation has been identified in the Council’s evidence base to meet a specific need for employment land on the Hoo Peninsula. Phasing its release until after the occupation of other previously developed sites is not justified and could cause unnecessarily delays or even prohibit the delivery of important employment capacity. HHH35 is deliverable in the early part of the plan period and is not dependent on the prior occupation of other employment sites.
- 3.37. To ensure the MLP is positively prepared, justified and capable of meeting identified employment needs, Policy SA14 should be amended to allow HHH35 to come forward earlier in the plan period and without dependency on other sites.

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

**Proposed Amendment 20 – Amend Policy SA14 so site HHH35 can be delivered earlier in the plan period and not be reliant on the delivery or occupation of any previously developed land.**

#### **Policy S22: Hoo Peninsula – Object (Not justified or effective)**

- 3.38. The Commissioners broadly supports the principle of Policy S22 and understands that there is a current shortfall in local services across the Hoo Peninsula. Therefore, new services will be required to support the proposed level of residential development in the area. However, further information is required in order for the MLP to be considered justified and effective.
- 3.39. Paragraph 77 of the NPPF (2024) states that the supply of a large number of new homes can often be best achieved through planning for larger scale development and that Local Authorities should ensure that their size and location will result in sufficient access to services and employment opportunities within the development itself. The land east of Hoo is therefore a logical location to deliver the main centre to provide services to both existing and future residents.
- 3.40. Policy S22 currently proposes that the preferred location for the main centre to be the east of Hoo. However, no further details on location or even which landholdings are provided. To ensure accountability, further information regarding location should be provided within the policy wording of S22 or reference be made to the Concept Plan shown in Figure 14.
- 3.41. Policy S22 states that:
- “Proposals will need to be supported by a robust justification and up to date evidence taking into account the existing provision, demographics, character and scale of the area. An impact assessment will be required where triggered.”*
- 3.42. This requirement puts the burden of undertaking technical assessments on the landowner/ developer which is not *justified* when the local centre will be meeting the needs of multiple new developments across the area, as well as meeting existing community shortfalls. Instead, the policy should be informed by technical work undertaken by Medway Council and its delivery should be funded proportionately by all developments that will subsequently benefit. In addition, the need for an impact assessment should not exceed the requirements as set out by the NPPF.
- 3.43. Figure 14 of the MLP proposes a number of services on the Commissioners’ land West of Roper’s Lane. This infrastructure includes: retail/community services; community facility; leisure centre/ sports facility; and a health facility. No reference to Figure 14 is made in Policy S22. This should be amended to ensure cohesion and consistency between Local Plan policies in accordance with paragraph 16(d) of the NPPF.
- 3.44. It is also noted that there is a spelling error in Policy S22, stating ‘talking’ instead of ‘taking’.

**Proposed Amendment 21 – Policy S22 requires amendment to ensure consistency with Figure 14 of the MLP.**

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

#### **Policy DM17: Grain Branch – Object (Not justified)**

3.45. Policy DM17 states the following:

*“The Policies Map shows safeguarded land for new rail infrastructure, including a station, route alignment and buffer stop zone. Development proposals which compromise this policy will be resisted.”*

3.46. As discussed earlier in these representations in relation to Policy SA8, the Commissioners objects to the safeguarding of a substantial part of its land East of Roper’s Lane for a potential railway station. There is insubstantial evidence to demonstrate a need or demand for a station and an inadequate funding plan for its delivery. The policy is therefore *not justified* and further evidence is required to demonstrate the deliverability of a railway station on the Land East of Roper’s Lane. Pell Frischmann provides further insight in Appendix 14 in relation to the evidence limitations.

3.47. The North West Policies Map currently conflicts with the concept plan shown in Figure 14 of the MLP. The Policies Map requires amendment in relation to the safeguarded transport land to ensure consistency with other policies in the MLP.

3.48. Greater flexibility is required on the wording of Policy DM17 in relation to a fall back position should a railway station not be delivered within an acceptable timescale on the site by the Council. Paragraph 129 of the NPPF (2024) requires planning policies and decisions to support development that makes efficient use of land. Should a railway station prove to be undeliverable, the land should therefore be allowed to be considered for alternative uses such as open space, biodiversity gain opportunities, or further development.

**Proposed Amendment 22 – Medway Council should reconsider the need for land to be safeguarded for a potential railway station on the Land East of Roper’s Lane.**

**Proposed Amendment 23 – Should there prove to be a demonstrable need and suitable mechanism for the delivery of a railway station on the Land East of Roper’s Lane, then a fall back position should be introduced in Policy DM17 to allow alternative land uses should the railways station not be delivered within a reasonable timeframe.**

**Proposed Amendment 24 – The North West Policies Map should be amended to be consistent with the Concept Plan comprising Figure 14 of the MLP. The land safeguarded for transport should be removed from the policy map and instead shown indicatively in Figure 14 of the MLP.**

## 4. Rural Settlements

- 4.1. The Commissioners owns significant landholdings around rural settlements across Medway Council's jurisdiction. As discussed previously, these sites have been promoted throughout the Council's Local Plan process and are considered to be available, suitable and achievable for residential development should Medway Council require any additional residential sites in the MLP. Each of the sites are in full ownership of the Commissioners and further detail of each site is set out below.

### **Policy SA11: Rural Settlements – Support**

- 4.2. The Commissioners supports the allocation of the Land at The Street, Stoke (AS11). The site comprises 0.15ha of agricultural land and is located within the village of Upper Stoke. The site is sustainably located with a bus stop within 40m of the site, providing access to a number of stops in Hoo St Werburgh and Allhallows, including 'The Hundred of Hoo Academy' secondary school.
- 4.3. Paragraph 135(c) of the NPPF (2024) states that planning policies should ensure that developments:
- “are sympathetic to local character and history, including the surrounding built environment and landscape setting.”*
- 4.4. The site lies adjacent to an existing row of five dwellings and provides an opportunity to continue the road frontage development in an appropriate and sustainable manner to ensure the protection and enhancement of Upper Stoke's character and setting.
- 4.5. Based on initial masterplanning work, the delivery of 10 homes on the site could be challenging. However, the current wording of 'up to 10' homes provides suitable flexibility that the exact quantum of development can be explored agreed through further design testing as part of any future planning application.
- 4.6. The site comprises a natural infill to the existing street scene on the High Street and supports Medway Council in meeting its 10% requirement for sites under 1ha. The site therefore provides a sustainable location for small-scale rural development and should maintain its allocation as the MLP progresses.

### **Allhallows (AS21)**

- 4.7. The site comprises 41.3ha and provides an opportunity for a sustainable extension to the existing settlement of Allhallows. The Commissioners is disappointed to see that the site has not been allocated in the MLP as it has the potential to deliver a phased mixed-use development, providing up to 400 houses in addition to land for tourism and leisure, open space and associated infrastructure.
- 4.8. Paragraph 88 of the NPPF (2024) states that planning policies should:
- “enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;”*



## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

- 4.9. Paragraph 88 of the NPPF (2024) also states that planning policies should enable:

*“sustainable rural tourism and leisure developments which respect the character of the countryside”*

- 4.10. It is considered that additional tourism and leisure use at this site could form an expansion to Kent Coast Holiday Park and assist in supporting the rural economy to raise skills levels and to increase local labour opportunities.
- 4.11. The site is suitable, deliverable and achievable with no overriding constraints and could come forward on a phased basis to allow the delivery of open space and leisure uses at an early stage in the plan process. Development of this site would help to deliver the Vision and Strategic objectives of the MLP.
- 4.12. A site location plan and indicative high-level concept plan have been provided at **Appendix 13**, demonstrating a potential indicative development layout.

**Proposed Amendment 25 – Allocate site AS21 for residential development as a main modification to ensure Medway Council meets its housing needs in the proposed plan period.**

#### **Mackays Court Farm (AS16)**

- 4.13. The site is brownfield land and comprises a number of modern agricultural buildings.
- 4.14. The site is sustainably located within 500m of a primary school, a GP Surgery, a church, a convenience store, a pub and a post office. The site is also located within 280m of two bus stops, providing access to further amenities in nearby Rochester.
- 4.15. Based on a density of 30 dph, it is estimated that approximately 12 dwellings could come forward on the site. The site therefore provides potential for the small-scale sustainable development of up to 12 dwellings and should be reconsidered for allocation should Medway Council need additional or alternative residential-led sites.
- 4.16. Paragraph 73 of the NPPF (2024) requires local planning authorities to accommodate at least 10% of their housing requirements on sites no larger than one hectare. Small sites can make an important contribution to meeting housing requirements and the site could be delivered in an early part of the Local Plan period. The site should therefore be allocated to support Medway Council in meeting its small site requirement and ensure the delivery of housing in the first five years of the Local Plan period.

**Proposed Amendment 26 – Allocate site AS16 for residential development as a main modification to ensure Medway Council meets its small site requirement and ensure the appropriate delivery of housing in the first five years of the plan period.**

#### **Burneys and Nord Court Farm (AS29)**

- 4.17. The site totals approximately 0.25ha and is located to the west of Stoke Road. The Commissioners previously submitted a pre-application in May 2023 (ref. PRE/23/1196). Medway Council concluded that

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

the site could be suitable for residential development given its location on the edge of the village of Lower Stoke.

- 4.18. The site is sustainably located and is well related to the village of Lower Stoke which is served by a primary school, a GP Surgery, a church, a convenience store, a pub and a post office. It is considered that the site could be capable of delivering up to six dwellings and would comprise semi-detached dwellings in keeping with the existing dwellings on Allhallows Road and Stoke Road.
- 4.19. The site would also support the Council in delivering housing on sites less than one hectare and within the first five years of the plan period. Therefore, the site should be allocated for small-scale residential development.

**Proposed Amendment 27 – Allocate site AS29 for residential development as a main modification to ensure Medway Council meets its small site requirement and ensure the appropriate delivery of housing in the first five years of the plan period.**

#### Land at Lower Stoke (AS13)

- 4.20. The site comprises 32.8ha and is located adjacent to the village of Lower Stoke. The site presents an opportunity for a sustainable residential extension comprising around 655 dwellings to the west of the existing settlement, either side of Cuckolds Green Road.
- 4.21. Depending on the scale of development proposed, social infrastructure could be provided, but this would be dependent on the wider strategy for the Hoo Peninsula. As the site is sustainable and accessible with no overriding constraints, there is scope for residential-led mixed-use development and open space. The Commissioners request that should additional or alternative residential sites be required to meet Medway Council's housing need, that the site be reconsidered for allocation.

**Proposed Amendment 28 – Allocate site AS13 for residential development as a main modification to ensure Medway Council meets its housing needs in the proposed plan period.**

#### Sharnal Street (HHH28)

- 4.22. The site comprises 1.45ha and is located to the west of Sharnal Street, near the village of High Halstow. The village contains a pre-school, a primary school, a village hall, a church, a convenience store and a pub, all of which are within 1km of the site.
- 4.23. The site is also located approximately 7km from the centre of Rochester which is serviced by a number of schools, shops, GP surgeries, restaurants and two train stations.
- 4.24. The site is located within 50m of two bus stops which provide regular services to Grain and Rochester. A public right of way already connects the site to these bus stops, thereby providing good access to a range of services in the area.

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

- 4.25. It is recommended that the site is allocated for up to 36 dwellings due to its more sustainable location and better access to services than other allocated sites in the MLP.

**Proposed Amendment 29 – Allocate site HHH28 for residential development as a main modification to ensure Medway Council meets its housing needs in the proposed plan period.**

#### Summary

- 4.26. The Commissioners owns a significant number of landholdings across Medway, offering the development potential of a range of scales, uses and locations. All of the sites listed above are suitable, available and achievable for residential development. The Commissioners kindly requests that should alternative or additional housing sites be required for allocation, that its landholdings are reconsidered for allocation. The allocation of additional greenfield sites is particularly pertinent due to the potential under-delivery of affordable housing in this plan period due to the significant infrastructure contributions and over-reliance on brownfield sites.
- 4.27. It is important to note that the MLP does not currently provide sufficient housing on small scale sites. As discussed earlier, a minimum of 10% of Medway Council's housing requirement must be delivered on sites of 1ha or less in accordance with paragraph 73 of the NPPF (2024). Medway Council's Land Availability Assessment (LAA) only identifies 1,926 homes on small sites, approximately 500 homes short of the required 10% figure. To comply with national policy, the Council must therefore allocate additional small sites and cannot solely rely on windfall development to meet this national policy requirement. Therefore, the Commissioners kindly requests that Medway Council relooks at sites AS16 and AS29 for allocation for residential development in the MLP to help meet the 10% small site requirement.

## 5. Chapter Farm, Strood West

### Background

- 5.1. The Commissioners support the allocation of Land West of Strood (Policy SA6) and the cross-boundary approach with GBC. To ensure the policy is effective and justified, a small number of refinements are suggested, including a review of the “heritage buffer” notation on Chapter Farm, clarification of the intended role of breaks in built form, and proportional evidence to support the proposed secondary school provision.
- 5.2. The site has been promoted throughout GBC’s Local Plan process and the Commissioners has undertaken engagement with GBC, Medway Council and the bordering site promoters/ landowners.
- 5.3. Due to the site’s cross boundary nature of the strategic policy and the Commissioners’ understanding that this policy will be replicated in GBC’s emerging Local Plan along with concept plan (including the Commissioners’ land), the Commissioners has provided high-level comments on Policy SA6 (Land West of Strood). The Commissioners reserves the right to make further, more detailed representations when GBC publishes its own Regulation 19 consultation, particularly since the site lies wholly within GBC’s administrative area.

### Policy SA6: Land West of Strood - Object (Not justified)

- 5.4. Paragraph 14.7.5 of the MLP states that:

*“Both authorities have commissioned a high-level masterplan to inform the framework of the policy and ensure the bespoke response is appropriately articulated. The policy below sets out the key considerations that will need to be taken into consideration, verified by discussions with statutory bodies and stakeholders and informed by evidence prepared by both authorities. It is expected however that developers will be required to undertake detailed assessments to further inform development proposals.”*

- 5.5. The Commissioners supports the cross-boundary masterplanning exercise that has taken place to ensure cohesive and sustainable delivery of development in the area. The Commissioners also supports continued engagement between the different landowners / promoters to prepare and progress the cross-boundary concept plan. However, it is important that each site remains deliverable independently to prevent housing delivery delays or viability issues.
- 5.6. Figure 12 of the MLP shows the high-level masterplan referred to in paragraph 14.7.5 which includes the Commissioners’ land at Chapter Farm. Should Medway Council and GBC continue to include a concept plan in the respective Local Plans, the Commissioners would recommend the local authorities note the following comments relating to heritage buffers; flexibility; education needs; and landscape.

### Heritage

- 5.7. The concept plan includes a significant buffer on the Commissioners’ land labelled ‘heritage’. During early engagement with Medway Council and GBC, the Commissioners explained that there are no heritage

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

constraints on the site and that the inclusion of such a significant buffer could unnecessarily constrain the development potential of the site. The Commissioners would like to reiterate to Medway Council that the existing farmstead located on the site does not comprise any designated heritage asset.

- 5.8. The Commissioners instructed a heritage appraisal of the site in May 2021, prepared by Cotswold Archaeology, to support the submission of representations to GBC. This heritage appraisal acknowledges the presence of the farmstead as per the following extract but concludes that it does not pose a constraint to development:

*“Chapter Farm (formerly Reed Court) is recorded within the HER as a historic farmstead with significant loss of historic built form. It is considered that some of the buildings within the Site may date to the late 19th century. These would not be considered heritage constraints to development”.*

- 5.9. Due to Chapter Farm’s status as a non-designated heritage asset and the conclusion by Cotswold Archaeology that the buildings provide no heritage constraints, the Commissioners caution Medway Council against introducing rigid policy requirements such as development buffers that could create unnecessary development constraints and undermine the developable area.

- 5.10. Criterion 8 of Policy SA6 states that:

*“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.”*

- 5.11. There is no evidence provided to conclude that the existing farmstead on the site is of any heritage significance. Without proportionate evidence to contradict the Commissioners’ heritage appraisal, Policy SA6 is not currently *justified* in relation to its heritage requirements.

- 5.12. Instead, the Commissioners request Figure 12 and Policy SA6 should allow flexibility in enabling Chapter Farm to be incorporated into the place-making principles of any future proposals and allow potential opportunities to enhance the current setting of the non-designated asset. A flexible approach should be adopted, enabling opportunities to sensitively integrate the asset into the development and enhance its setting as part of good placemaking. The proposed heritage buffer also conflicts with the main access route proposed in Figure 12 of the MLP and requires amendment. Due to Chapter Farm’s close proximity to the proposed main access, there is a significant opportunity to create a hub of activity, which would otherwise be lost if a development buffer is required.

#### Flexibility

- 5.13. The Commissioners supports the more flexible approach applied to the proposed locations for community infrastructure in Figure 12. For example, the concept plan highlights a ‘potential location for local centre’ or ‘potential location for school’. This enables flexibility when progressing more detailed design proposals and allows a design-led scheme to progress with minimal site constraints.



## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---

#### Secondary School

- 5.14. The Commissioners has undertaken a Community Infrastructure Audit for its site, Chapter Farm. The Assessment concluded that the delivery of 2,000 dwellings would generate a need equivalent to 2.47FE for secondary school spaces. Logically, it can therefore be extrapolated that the delivery of 4,000 dwellings would generate a secondary school need of approximately a 4-5FE school.
- 5.15. In addition, the Infrastructure Audit concluded an existing spare capacity in the local area of 197-944 secondary school spaces. However, this is largely dependent on the proposed capacity strategy for Maritime Academy.
- 5.16. The Commissioners supports in principle the inclusion of new education services across the Land West of Strood to mitigate the development. However, the requirement for an 8FE secondary school requires further evidence since the delivery of 4,000 homes does not justify an 8FE school in isolation. This is particularly pertinent in consideration of the substantial amount of existing secondary school capacity in the local area.
- 5.17. Should the provision of a secondary school be meeting a wider educational need across the borough, then the Commissioners questions whether another site in the local authority would be more suitable due to the existing capacity in the area. If proposed on the Land West of Strood, then appropriate financial contributions should be collected from the benefitting sites to support the delivery of the secondary school. Appropriate transport links should also be taken into considering should children be travelling substantial distances from other benefitting sites to the Land West of Strood.
- 5.18. Due to the very close proximity of Strood Academy, it is recommended that should a secondary school be required for the Land West of Strood, it should not be located on the Commissioners' land. Instead, the school should be located further east to provide a wider catchment area for existing and future residents in Strood.

#### Landscape

- 5.19. The Commissioners instructed The Richards Partnership to produce a Landscape and Visual Technical Note report as part of its technical evidence base for Chapter Farm. The Richards Partnership recommended a landscape strategy which introduces bands of planting along the north-west facing slopes of the site. As the trees mature, this approach will break up the introduced built form and create an informal parkland character.
- 5.20. The Richards Partnership also recommended that interconnecting links be provided between these planting bands. Combined, this planting strategy will create a treed green framework of spaces and routes throughout the site. This landscape report was submitted to Medway Council and GBC following initial engagement meetings.

## **Medway Local Plan 2041 - Regulation 19 Consultation**

### **Representations – Savills on behalf of The Church Commissioners**

---

**Proposed Amendment 30 – Amend Figure 12 of the MLP to remove the heritage buffer proposed in the Land West of Strood Concept Plan.**

**Proposed Amendment 31 – Evidence is required to justify the need for an 8-FE secondary school to be delivered on the Land West of Strood as this substantially exceeds the proposals' own demands.**

## 6. Summary & Conclusions

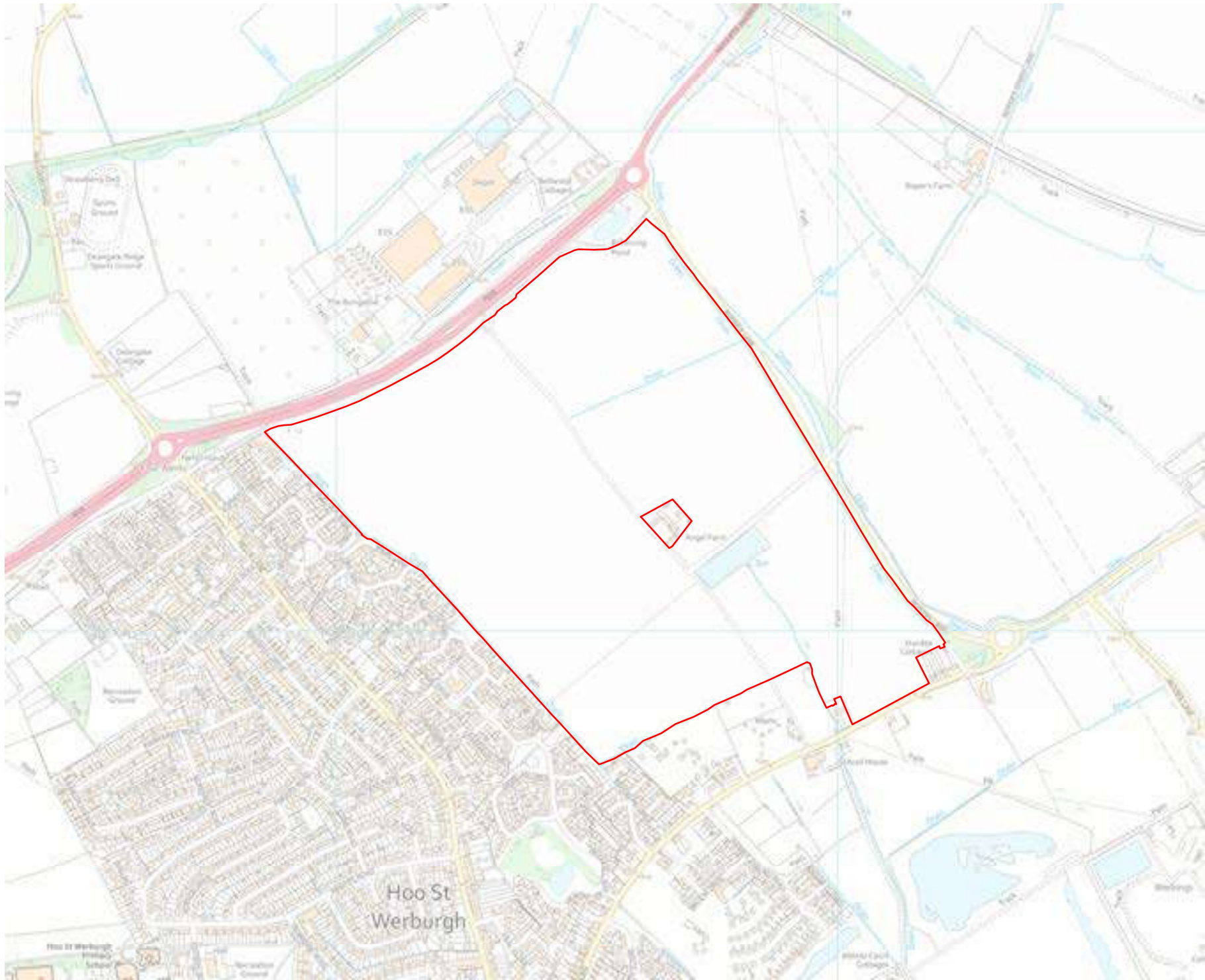
- 6.1. The Church Commissioners for England welcome the inclusion of their landholdings within the Medway Local Plan and fully support the allocation of sites at Land East and West of Roper's Lane, Kingsnorth and The Street, Stoke. These sites are capable of delivering high-quality, sustainable communities that align with the Council's growth strategy and the objectives of national policy.
- 6.2. The targeted modifications outlined in these representations and summarised earlier in Table 1 are intended to provide clarity, improve deliverability and ensure the Plan is justified, effective and positively prepared. The Commissioners remain committed to working collaboratively with Medway Council and other stakeholders to refine the policies and bring forward development at the earliest opportunity.
- 6.3. The Commissioners confirm that they wish to participate in the Examination in Public on the matters raised and request to be kept informed of all submission and examination stages.

---

## Appendix 1.0

### Site Location Plan - Land West of Roper's Lane (HHH22)

---



**Key**

Site Boundary (area: 74.0 ha)

0 100 200 m

Based upon Ordnance Survey mapping with the permission of His Majesty's Stationary Office. © Crown Copyright reserved. Licence number 100017707



Project	Medway Call for Sites 2023
Title	Site Location Plan - Hoo: West of Ropers Lane
Client	The Church Commissioners for England
Date	24.02.2023
Scale	1 : 10,000 @ A4
Drawn by	MAR
Drg. No	GIS\CL\13786\01-05
GIS Reference : S:\CL Jobs\CL13786 - Medway Call for Sites 2023\CL13786 - Medway Call for Sites 2023 - Site Location Plan - Hoo - West of Ropers Lane - 24.02.2023.mxd	



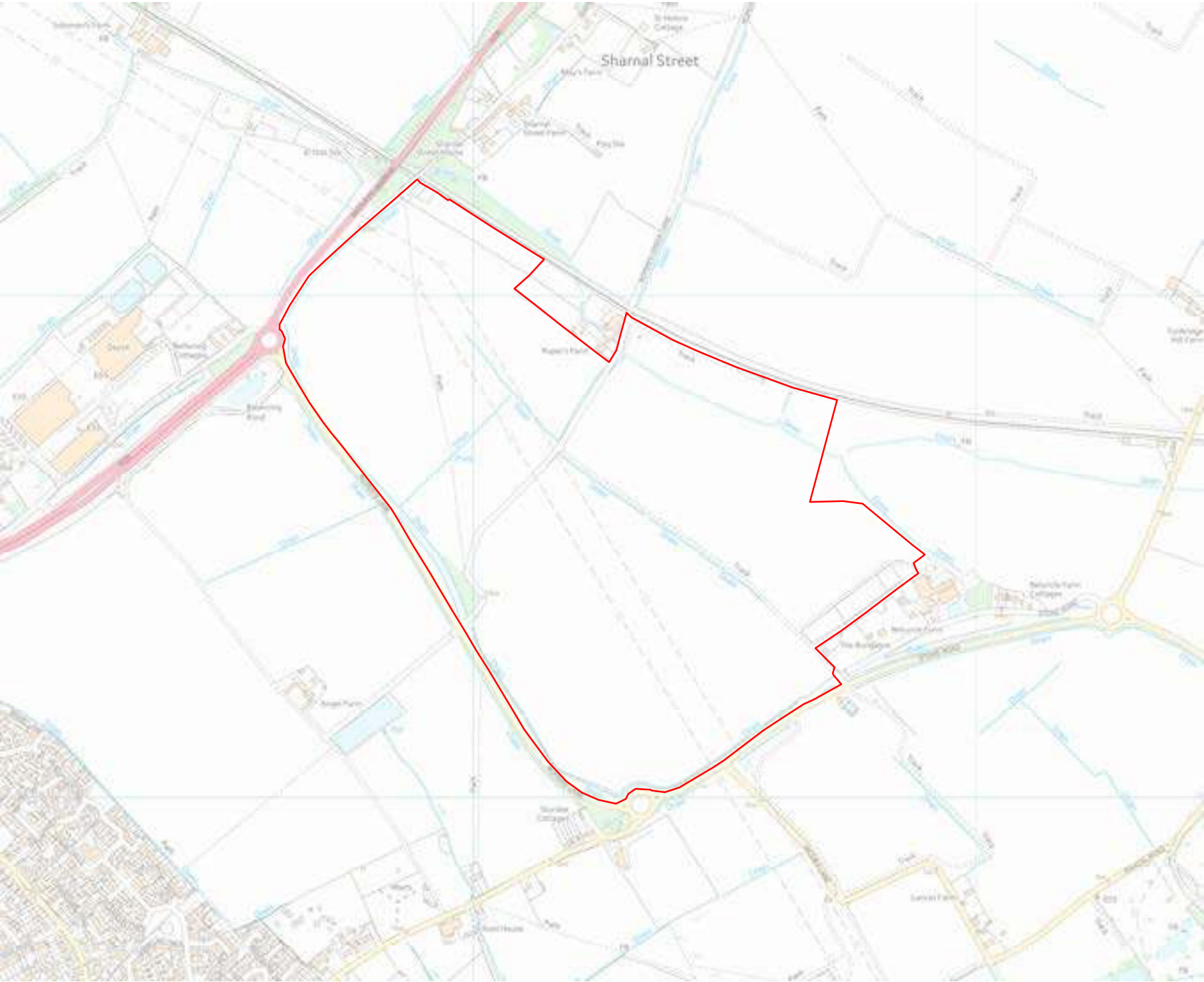


---

## Appendix 2.0

### Site Location Plan - Land East of Roper's Lane (HHH31)

---



**Key**

Site Boundary (area: 82.3 ha)

0 100 200 m

Based upon Ordnance Survey mapping with the permission of His Majesty's Stationary Office. © Crown Copyright reserved. Licence number 100017707



Project	Medway Call for Sites 2023
Title	Site Location Plan - Hoo: East of Ropers Lane
Client	The Church Commissioners for England
Date	24.02.2023
Scale	1 : 10,000 @ A4
Drawn by	MAR
Drg. No	GIS\CL\13786\01-04

GIS Reference: S:\CL\Job\CL13786 - Medway Call for Sites 2023\CL13786 - Medway Call for Sites 2023 - Site Location Plan - Hoo - East of Ropers Lane - 24.02.2023.mxd



---

## Appendix 3.0

### Site Location Plan – Kingsnorth (HHH35)

---



---

## Appendix 4.0

### Site Location Plan – All Hallows (AS21)

---





Key

Site Boundary (area: 41.3 ha)

0 100 200 m

Based upon Ordnance Survey mapping with the permission of His Majesty's Stationary Office. © Crown Copyright reserved. Licence number 100017707



Project	Medway Call for Sites 2023
Title	Site Location Plan - All Hallows
Client	The Church Commissioners for England and Bourne Leisure Limited
Date	24.02.2023
Scale	1 : 7,500 @ A4
Drawn by	MAR
Drg. No	GIS\CL\13786\01-01

GIS Reference - S:\CL Jobs\CL13786 - Medway Call for Sites 2023\CL13786 - Medway Call for Sites 2023 - Site Location Plan - All Hallows - 24.02.2023.mxd



---

## Appendix 5.0

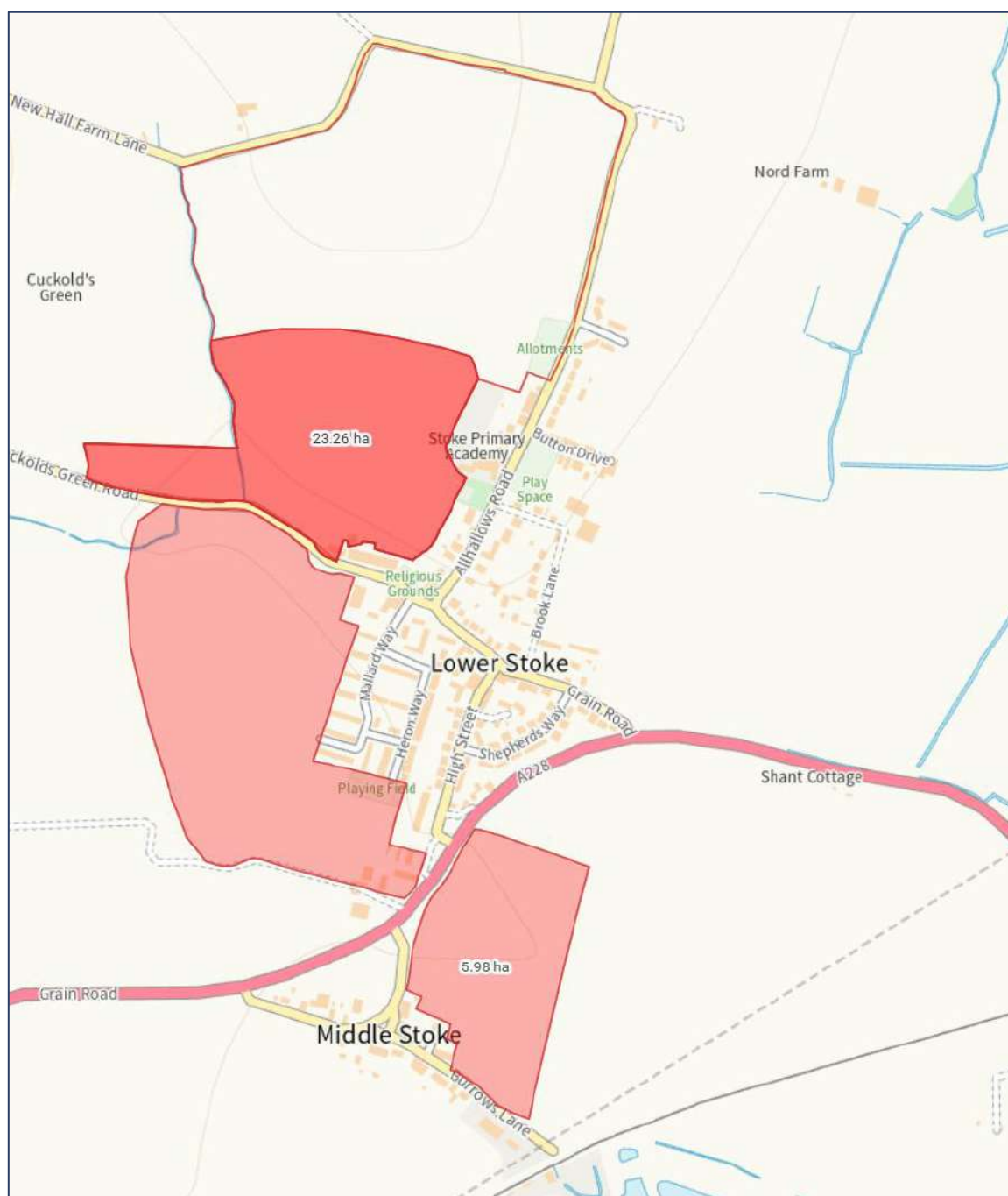
### Site Location Plan – Lower Stoke (AS13)

---

## Medway Local Plan 2041 - Regulation 19 Consultation

### Representations – Savills on behalf of The Church Commissioners

---



---

## Appendix 6.0

### Site Location Plan – Mackays Court Farm (AS16)

---

**2f - Mackays Court Farm (Middle Stoke – refs. AS14 and AS16)**





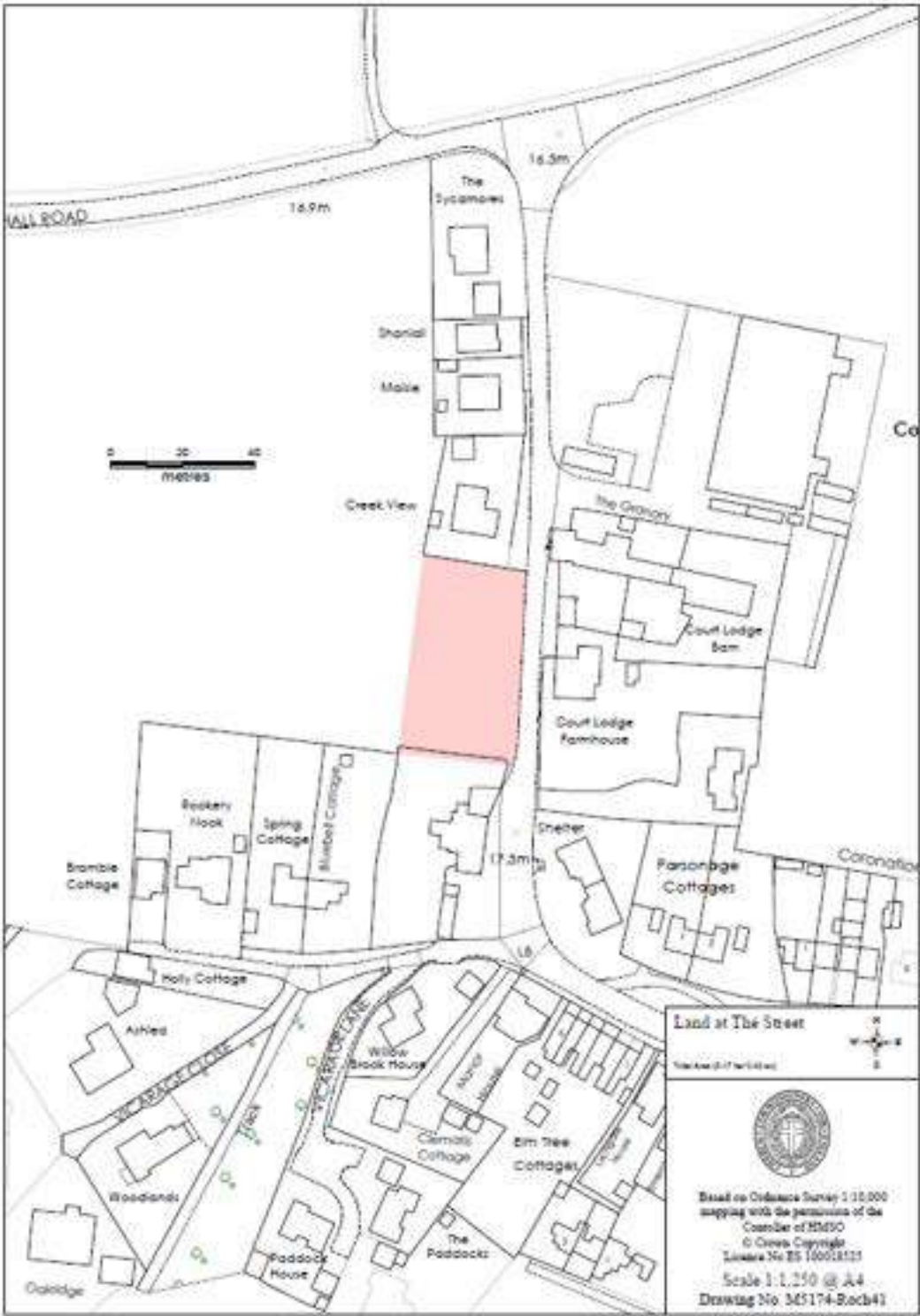
---

## Appendix 7.0

### Site Location Plan – Land at The Street, Stoke (AS11)

---

2g - Land west of the Street (Upper Stoke – ref. AS11)



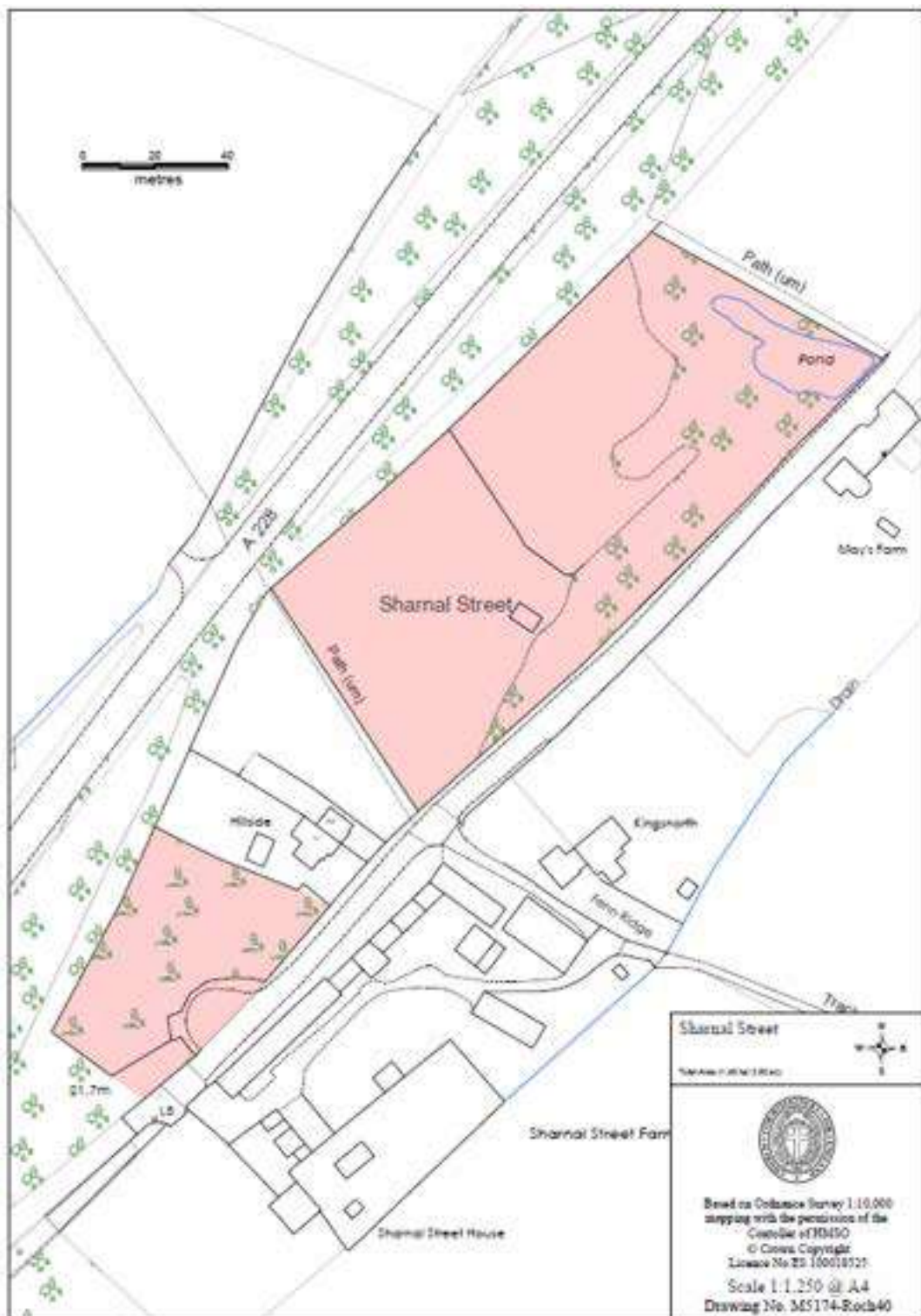
---

## Appendix 8.0

### Site Location Plan – Sharnal Street, Stoke (HHH28)

---

## 2h - Sharnal Street (ref. HHH28)



---

## Appendix 9.0

### Site Location Plan – Burney’s and Nord Court Farm

---



## 2i - Burney's and Nord Court Farm (ref. AS29)



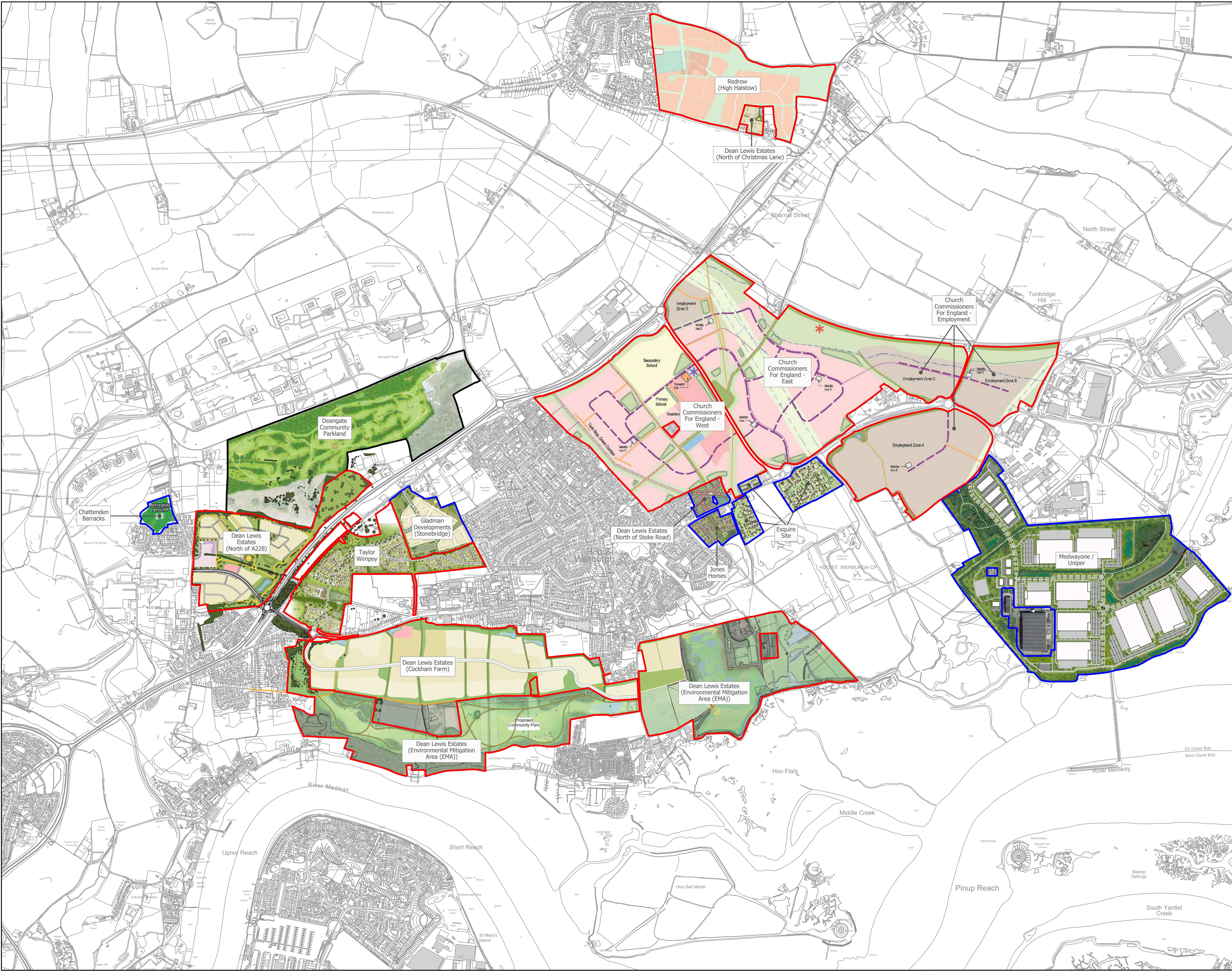
---

## Appendix 10.0

### Consortium Composite Masterplan – Land at Hoo and High Halstow

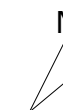
---





- Consortium Boundaries
- Other Boundaries
- Council Boundaries

**DRAFT**



Project  
**GREATER HOO CONSORTIUM 4**

Drawing Title  
**COMPOSITE MASTERPLAN**

Date 15.04.25	Scale 1:10,000 @A1 1:20,000 @A3	Drawn by J.W.	Check by N.T.
Project No 333102200	Drawing No STN-GEN-SW-DR-MP-01C	Revision	



---

## Appendix 11.0

### Concept Plan – Land East and West of Roper's Lane

---

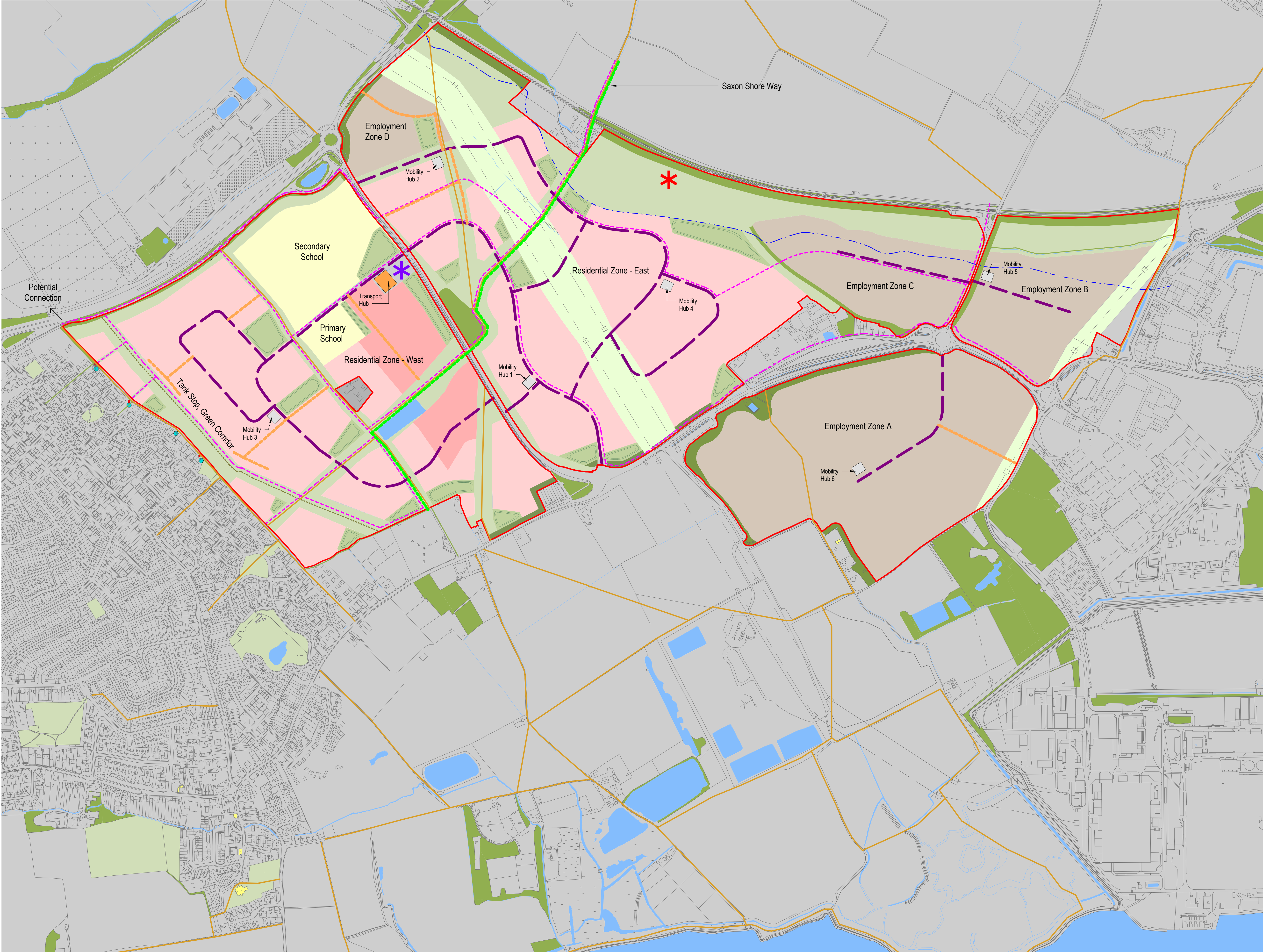


Proposals Key

- Proposed Residential Area - Medium Density / High Density
- Proposed Employment Area
- Proposed Transport Hub
- Proposed School Locations
- Proposed Landscaped Buffer
- Proposed Green Corridor/POS
- Proposed Easement Under Overhead Powerlines
- Proposed Attenuation Basin
- Ponds (Existing and Proposed)
- Primary Vehicular Route
- Secondary Vehicular Route
- PROW Route
- WW2 Tank Stop Line
- Saxon Shore Way
- Proposed Cycle Route
- Flood Risk Line
- \*

Potential Future Railway Station
- \*

Retail Unit



25m 75m 175m

The copyright of this drawing is vested with Constorphine & Wright Ltd and must not be copied or reproduced without the consent of the company.

P4	Amendments to employment zone, cycle path and green corridor	11.07.24	KW	AR
P3	Minor graphic amendments to SUDs attenuation basins	09.07.24	CB	AR
P2	Attenuation basin added	05.07.24	KW	AR
P1	Layout updated following receipt of comments, WC 10.06.24	21.06.24	TD	AR
Rev.	Description	Date	Drw.	Chk.

Client:  
Church Commissioners For England (CCfE)

Project:  
Hoo St Werburgh

Drawing Title:  
Concept Proposals (PHASE 2)

Drawing Status:  
PRELIMINARY

				Revision
Leeds Studio The Studio, Candle House, 1 Wharf Approach, Leeds, LS1 4GH 0113 213 5656 constorphine-wright.com				P4
Drawing No. 20231-HSW-CWA-ZZ-XX-DR-A-0305				
Drawn CB	Checked AR	Paper Size A1	Scale 1 : 5000	Date 06/10/24



---

## Appendix 12.0

### Concept Plan – All Hallows (AS21)

---





DRAFT

# LICHFIELDS

Project	Allhallows
Title	Site Concept Plan
Client	The Church Commissioners for England
Date	06.09.24
Scale	NTS
Drawn by	SG
Dwg. No.	IL04051-03-001 RevD
Copyright © 2008 Informa Ltd & BlueSky. Copyright © 2008 Intel. All rights reserved.	



IG/LF04051/03



---

## Appendix 13.0

### Transport Representations – Pell Frischmann

---

Project	Medway Local Plan Regulation 19
Document Title or Subject	Church Commissioners for England Transport Representations
Document Reference	105391-PEF-XX-XX-TN-TR-004007
Revision Reference	P01
Date	11 August 2025

# 1 Introduction

## 1.1 Background

- 1.1.1 Pell Frischmann (PF) has been appointed by the Church Commissioners for England (the Commissioners) to provide transport planning and highways engineering advice, and to produce these Representations summarising the Commissioners’ transport position with regard to the emerging Medway Local Plan (LP) which is currently at Regulation 19 consultation stage.
- 1.1.2 The Commissioners are responsible for substantial land holdings across the Hoo Peninsula, Kent (the Peninsula). The Peninsula forms the northern part of the Medway Council (MC) local authority area, for which MC is the Local Planning Authority and Local Highway Authority.
- 1.1.3 The Commissioners has been working alongside a wider group of developers and landowners<sup>1</sup> (termed the Hoo Consortium; ‘the Consortium’) with significant landholdings on the Peninsula and/or the capability to bring forward significant levels of development. The Commissioners has been working in collaboration with Medway Council (MC), directly and through the Consortium, for an extended period of time both to deliver development, and to provide sites in support of the Local Plan, assisting Medway in achieving its goals for sustainable growth.

## 1.2 Scope of this Technical Note

- 1.2.1 Medway Council are developing a new Local Plan to provide the framework to guide the development and use of land in Medway up until 2041 and it will replace the previous 2003 Medway LP. MC released the LP for Regulation 18 consultation in July 2024 and released the revised evidence base and LP for Regulation 19 consultation in June 2025.
- 1.2.2 This Technical Note (TN) summarises the Representations of the Commissioners with regard to the transport aspects of the emerging LP, including:
  - Matters specific to the Commissioners and the allocations in which the Commissioners’ have interest, and their associated policy aspects relating to the proposed potential BRT scheme and rail safeguarding.
  - Consideration of the LP on a wider basis resulting from review of the LP and the following key transport documents in the LP Evidence Base:
    - Local Plan (Regulation 19 version)
    - Strategic Transport Assessment (STA)
    - Infrastructure Delivery Plan (IDP)
    - Proportionality Assessment (contained within the STA pack)
    - Assessments of M2 Junction 1 (contained in multiple documents under the STA pack)

<sup>1</sup> The Consortium comprises the Commissioners, Dean Lewis Estates, Redrow and Taylor Wimpey

## 2 Regulation 19 Transport Representations

### 2.1 Ropers Lane Site Allocations

- 2.1.1 The Commissioners notes the inclusion of the combined HHH22, HHH31 & HHH35 allocation, 'Land either side of Ropers Lane', in the Regulation 19 Local Plan. The Commissioners strongly welcomes the incorporation of the land to the east of Ropers Lane (HHH31) in addition to the land to the west (HHH22, 'Land to the east of Hoo') which was already included at the Regulation 18 stage. The Commissioners believe that the inclusion of this additional land will further support the main/town centre policy aspirations for HHH22 and will help focus sustainable new development on the most accessible locations within the emerging Hoo allocations.

### 2.2 Potential BRT Scheme

- 2.2.1 The Commissioners very strongly welcomes the commitments in the LP to the provision of a bus rapid transit (BRT) provision on the Hoo Peninsula which will connect Strood to Hoo St Werburgh (e.g. policies SA5, S20, and the Medway Vision). The Commissioners believes that a high-quality, fast, frequent and reliable bus corridor to Strood is likely to be the most effective method of achieving real mode shift away from the private car for trips to and from Hoo and the wider Peninsula.
- 2.2.2 Given that the Evidence Base and Mode Share Strategy indicate that the provision of BRT is fundamental to achieving mode shift for trips on the Peninsula, it is disappointing that the detail of the BRT provision has not been further explored in the LP or associated Evidence Base. In particular:
- No indicative routing, or safeguarding thereof is indicated on the Policies Map. It would be appropriate to safeguard routes, or potential routes, at this stage to ensure that development does not risk cutting off the most viable routes.
  - Policy SA8 (Hoo St Werburgh and Chattenden) mentions safeguarding of the rail freight line (i.e. Policy DM17, see below), but does not specify safeguarding for BRT provision.
  - The new 'town centre' to be provided as part of allocation HHH22 is one of the logical destinations, alongside Kingsnorth, for the BRT and should be directly connected to the future bus network including for onward connections towards High Halstow, Grain and All Hallows
  - No indication is provided as to how the potential routeing could interact with allocations already under delivery.
  - Highway junction improvements and mitigations do not include any indication of bus priority which should be provided regardless of the BRT proposals, nor of how the BRT might connect or interact with the existing highway network at or around these locations (e.g. at Four Elms and/or Sans Pareil).
  - The Infrastructure Delivery Plan (IDP) does not directly mention the BRT noting only the "key role for bus improvements"<sup>2</sup>, and Appendix 1 (the Infrastructure Delivery Schedule) excludes it entirely, mentioning only the (unfunded) extension of operator bus services and not the infrastructure to achieve this.
  - The Proportionality Assessment considers only general highway infrastructure. BRT infrastructure should be a primary component of that assessment.
- 2.2.3 The Commissioners are strongly supportive of the BRT proposals and would welcome the opportunity to continue to engage further with MC on this matter to ensure that these are elevated to their proper status in the LP.

### 2.3 Policy DM17 'Grain Branch' Safeguarding

- 2.3.1 Policy DM17 'Grain Branch' states:

---

<sup>2</sup> Bus table under paragraph 3.2.2; IDP



*“The Policies Map shows safeguarded land for new rail infrastructure [on the Hoo Peninsula], including a station, route alignment and buffer stop zone.*

*Development proposals which compromise this policy will be resisted.”*

- 2.3.2 The Commissioners request that MC reconsider the area identified for safeguarding. In the Commissioners’ view, the land indicated is expansive and substantially greater than that which might be required to achieve the policy aims.
- 2.3.3 A large area to the south of the railway is shown which it is unlikely any station could require in this location given that large-scale parking is not likely to be appropriate and in any case could be provided in a more space-efficient multi-story format.
- 2.3.4 Additionally, a wide corridor of safeguarding is shown connecting the rail-adjacent area to the Ropers Lane x Stoke Road Roundabout. Notwithstanding a need to ensure potential infrastructure is not isolated from the highway network, the Commissioners believes that this intent could much more appropriately be achieved with a requirement to provide the connectivity as a part of the HHH31 allocation policy.
- 2.3.5 More generally however, the Commissioners questions the need to make a safeguarding provision at all at this point. There is no current justification or evidence available that a proposed station could reasonably come forward in this location. It is noted that MC had previously secured Housing Infrastructure Fund funding for bringing forward a station at this location, but was unable to do so. The Commissioners is of the view that any future funding available should instead be focussed upon substantive and deliverable improvements in bus provision, such as the proposed BRT connection to Strood.
- 2.3.6 In the event that MC is still minded to include an element of safeguarding, the Commissioners would suggest that a time limitation is added to the policy such that, if no scheme is forthcoming by a given point in the LP period, then that land can be released for other uses.

## 2.4 Local Plan (Regulation 19 Version)

### Vision for Medway

- 2.4.1 Vision for Medway in 2041 (Section 2) states:

*“[...] Medway has achieved sustainable growth, development that has responded positively to tackling climate change, providing for healthier and more sustainable choices of homes, transport and workplaces, [...]*

*Improved travel choices and infrastructure have reduced the use of the car across Medway, with people benefitting from better provision for pedestrians and cyclists, and a greater public transport offer. This has transformed how people move through the central urban areas, improved air quality and strengthened the connections with wider neighbourhoods and villages. [...]*

*Medway is a healthy place in which to live and work. People can move around more easily, with good walking and cycling links and clean air. [...]*”

- 2.4.2 The Commissioners strongly believes, and has long maintained, that a vision-led approach to development with integrated public transport, walking, wheeling and cycling is key to the delivery of sustainable development in Medway.
- 2.4.3 The Commissioners notes that a lack of access to public transport is an issue cited by a ‘vast majority’ of existing residents in the Medway villages<sup>3</sup> and believes that new and improved bus services, enabled by new development, will be key to achieving long term modal shift. This will result in users moving away from private

<sup>3</sup> Medway Village Infrastructure Audit (June 2025)

cars as the 'default' for local and strategic journeys both for new residents on the Peninsula and current residents living in the area. Active travel provides both the opportunity to reduce carbon impacts of travel whilst improving health outcomes.

- 2.4.4 The Commissioners therefore welcomes the 2041 Vision for Medway which underpins and informs the emerging Medway Local Plan.

**Policy S20: Strood District Centre**

- 2.4.5 Policy S20 includes:

*"A transport interchange (within or adjacent to the centre), providing a destination for a Bus Rapid Transit corridor connection with Hoo St Werburgh. [and]*

*Improved pedestrian access and new platforms at Strood rail station to enable access to London Victoria services."*

- 2.4.6 The Commissioners welcomes the inclusion of these items in the Strood centre policy, noting that the requirement for interchange between modes is one of the biggest barriers to modal shift. The need for any interchanges to be seamless and integrated is therefore essential.
- 2.4.7 Fast and convenient interchanges between modes (e.g. at Strood) will be a key contributor to enabling longer distance travel to switch from the car to public transport modes. Strategic mode shift is likely to be most effective at limiting issues on the strategic network, such as at M2 Junction 1, and the Commissioners would welcome plans for improvements at Strood to come forward as early as possible in the Local Plan period.
- 2.4.8 Additional to Strood itself, this policy notes that Strood can provide a destination for a new Bus Rapid Transit (BRT) corridor to Hoo St Werburgh. The Commissioners strongly welcomes the inclusion of this item in the Policy (noting this is captured in more detail in Section 9 of the Local Plan). A new BRT connection between Strood and the Peninsula provides the opportunity for a real and tangible step-change in public transport provision to the current and future developments on the Peninsula and will provide a corridor around which sustainable-transport led development can come forward. It will ensure that buses provide a competitive and practical alternative to private car trips between two major trip generation areas, whilst also being relatively rapid to deliver and enabling new/expanded services to be implemented flexibly as demand builds.
- 2.4.9 BRT would also provide convenient interchange opportunities with Strood National Rail station as well as links towards onward routing into Rochester and to the west. As with the interchange point above, the Commissioners would welcome BRT infrastructure coming forward at the earliest opportunity, noting that the infrastructure can come ahead of the future services, and that surety of routing and provision provides the certainty about which masterplans can be prepared and which new development can rely on from 'Day 1' to ensure that sustainable travel patterns are locked in from the outset of occupation.

**Policy S22: Hoo Peninsula**

- 2.4.10 The Commissioners welcomes the comprehensive set of allocations proposed under Policy S22 and looks forward to working in partnership with Medway Council and other stakeholders to bring forward successful sustainable transport-led places through the Local Plan period, should these be successfully allocated.
- "New growth for the Hoo Peninsula will require supporting infrastructure and three centres to provide for the needs of new residents."*
- 2.4.11 The Commissioners notes and agrees the challenges and responsibilities which arise to being forward the level of development proposed. Through the inclusion of new, vibrant local and 'town centre' facilities, new (and existing residents) will have the choice to be able to meet their day-to-day needs in their locality without needing to drive to facilities elsewhere in the Borough.

- 2.4.12 The Commissioners notes and supports the policy to direct one of the larger ‘centres’ to within the Land Either Side of Ropers Lane allocations (HHH22 & HHH31) and agrees that this will help ensure a vibrant, successful development, which enables the day-to-day needs of residents to be served locally, accessed by walking, wheeling and cycling.

### **Section 9: Transport: Place-based Vision**

- 2.4.13 With regard to ‘place-based vision’, Section 9 of the Local Plan (Reg 19 Version) states:

*“Crucially, new development must not reinforce historic travel patterns or car dependency; rather, it will support a place-based vision for access and movement, and a sustainable future for Medway and its communities.”*  
[Paragraph 9.1.1]

*“Development proposals will describe how they support the place-based vision for access and movement.”*  
[Paragraph 9.1.5]

*“The Hoo Peninsula has reduced car dependency and achieved a higher level of self-containment to facilitate local living in an age of increased remote working, while local employment opportunities are available at Kingsnorth and the Isle of Grain. Travel choice to/from the rural area has been improved through planning and investment in public transport, realised through the early delivery of a Bus Rapid Transit corridor, connecting Hoo St Werburgh and Strood town centre.”* [Vision for Access and Movement in Medway]

*“The place-based vision for access and movement marks a shift from the traditional ‘predict and provide’ approach to the latest best practice ‘vision and validate’ approach.”* [Paragraph 9.1.8]

- 2.4.14 As noted above, the Commissioners strongly welcomes the robust focus on place-based transport planning which is led by a vision for public transport (primarily bus-based), walking, wheeling and cycling. The aspiration for early delivery of the BRT corridor is welcomed (as discussed above).
- 2.4.15 Whilst supportive of the overarching theme and sentiment, it is suggested that the term “self-containment” could be interpreted in a negative way. An alternative terminology, such as ‘self-sufficiency’, could serve to highlight the positive attributes of localised place-making in a manner more conducive to the aims of the LP.

### **Section 9: Transport: Vehicle Trip Generation/Budget**

- 2.4.16 With regards to a vehicle trip budget:

*“9.2.3. The IDP [Infrastructure Delivery Plan] will establish a vehicle trip budget. This is aligned with a reasonable worst-case scenario. Committed developments would benefit from the first tranche of vehicle trip credits, followed by site allocations. Vehicle trip credits for unimplemented consents that subsequently expire would be recycled.”*

*9.2.4. The IDP will set out developer contributions for the package of transport mitigations across individual site allocations. This will be based on the distribution of new trips routing through junctions that would require mitigation.”*

- 2.4.17 At time of writing the IDP does not define the vehicle trip budget, referring instead to a vehicle trip credit with no further qualification. Paragraphs 9.2.13 and 9.2.14 of the Local Plan (Reg 19 Version) state that the Strategic Transport Assessment (STA) will be the source for the vehicle trip budget, however these documents do not explicitly define what the vehicle trip budget will be, though it is appreciated that the relevant data is likely captured in the comprehensive appendices to that batch of documents.
- 2.4.18 Given the magnitude of the infrastructure costs which must be apportioned and which it is anticipated will depend on the vehicle trip budget/credit, the Commissioners would welcome further discussions with Medway Council to establish in clear and definitive terms, what the relevant vehicle trip budget(s) are expected to comprise.

**Policy DM15: Monitoring and Managing Vehicle Trip Generation**

*“As a minimum, development proposals for site allocations of 50 or more homes, or 5,000 sqm floorspace, will demonstrate how vehicle trip generation would be materially lower than the vehicle trip credit set in the IDP. This target is intended to positively challenge developers to pursue a creative approach, however full policy compliance should ensure that this is achievable.*

*Developer contributions towards the package of transport mitigations will be due in line with the Infrastructure Delivery Plan (IDP) or the outcome of a Medway-wide Monitor and Manage Mitigation Strategy.*

*Development proposals in urban centres, including site allocations, are exempt due to their accessible location, providing they comply with all other transport-related policies in this Local Plan.*

*Development proposals for ‘windfall’/unforeseen sites will also be expected to make proportionate developer contributions towards the package of transport mitigations.”*

- 2.4.19 The Commissioners welcomes a policy basis for managing vehicle trip credits but would query why the minimum cutoff of 50 homes / 5,000sqm floorspace is to be applied. Though not a large proportion of overall development, small developments are also contributors to the need to improve infrastructure provision on the Peninsula and so the Commissioners would expect that they should fall under the same requirement as ‘windfall’ sites, in that they would also be expected to make proportionate contributions towards the necessary transport mitigations.
- 2.4.20 It is also considered that the monitor and managing of the trip credits should be controlled by Medway Council and that the Council should be responsible for managing any reallocation credits as required through the monitoring process.
- 2.4.21 The Commissioners also understands that different forms of development are expected to contribute towards transport mitigation commensurate with their impacts but would query why accessible locations are proposed to be exempt from any and all contributions. Accessible areas will have high levels of frequent public transport and impacts in these areas could, for example, impose new associated service running costs or additional active travel infrastructure needs. Employees, residents and other users of current accessibly-located developments will still require connectivity to less accessible areas, particularly if future commercial development is encouraged in areas that are currently less accessible, such as the Hoo Peninsula.
- 2.4.22 The LP has the greatest chance of success if all stakeholders have an involvement in the expansion of the public transport and active travel networks in Medway, regardless of their current location. Exempting more accessible sites, and those below a certain scale/threshold, from contributing towards these transport improvements will therefore have viability implications for the remaining site allocations.

**Policy DM18: Transport Assessments, Transport Statements and Travel Plans**

- 2.4.23 Policy DM18 and paragraph 9.11.8 state:

*“Development proposals on the Hoo Peninsula will adhere to an Area-wide Travel Plan. This reflects the specific circumstances of this rural area. This will identify mode share targets and specific measures aligned with the anticipated phasing of new development. The Area-wide Travel Plan will set out positive and practical measures; it will need to be flexible, but sufficiently detailed and meaningful. Having established a baseline, monitoring arrangements will assess the performance of the road network and, should targets not be met and/or the performance of the road network found to be unacceptable, set out any additional measures required.”*

- 2.4.24 The Commissioners notes and welcomes the commitment to an Area-Wide Travel Plan. Informed by the Sustainable Transport Strategy, produced through collaborative working with the wider Consortium, an Area-Wide Travel Plan has been prepared which can achieve the aspirations of the Commissioners, the wider Consortium and Medway Council, whilst ensuring that potential development can come forward as sustainably

as possible. It is expected that this should become the Area-Wide Travel Plan noted in the policy, subject to agreement with Medway Council.

- 2.4.25 The Area-Wide Travel Plan is currently in preparation through the Consortium and a draft version has been included as an appendix to the Consortium's Representations. The Commissioners would welcome further discussions with Medway Council on the Travel Plan, including how the Travel Plan can tie into the emerging proposals for BRT on the Peninsula.

**Policy SA8 Hoo St Werburgh and Chattenden; and Policy SA9: High Halstow**

- 2.4.26 Policies SA8 and SA9 both contain text with regard to potential bus services:

*"Development will support the improvement of bus services to provide effective sustainable transport links for [policy allocation], with consideration of expansion of fast-track bus services linked to the urban area."*

- 2.4.27 The Commissioners strongly welcomes the commitment to BRT services but would suggest in these policies that the wording be adjusted from "fast-track bus services" to "bus rapid-transit services (or similar)". Whilst the Kent Fastrack bus network is a strong example of BRT in the adjacent area, the new provisions could be run by any (or any combination) of operators, which may or may not include Fastrack (operated by GoAhead).
- 2.4.28 Engagement undertaken on behalf of the Commissioners through the Hoo Consortium has included engagement with the current major local bus operator (Arriva) to discuss the emerging proposals on the Peninsula. Feedback has been positive with the Operator keen to expand commercial services as demand increases. The Operator noted that there are no substantive constraints to expansion of services in frequency, capacity or coverage as demand increases.

**Policy SA11: Rural Settlements; Policy SA12: Other Sites; and Policy SA14: Employment Sites**

- 2.4.29 The Commissioners would suggest that these three policies could benefit from the inclusion of a line item, as Policies SA8 and SA9, to support improvement to BRT bus provision. Many of the sites covered by these policies will benefit from the availability of new and improved bus services, and funding of sustainable travel measures should be prioritised over general highway infrastructure. It is noted that many of these sites will be captured under the need to fund highway mitigation.

## 2.5 Strategic Transport Assessment

- 2.5.1 PF has not undertaken a detailed technical review of the STA as part of the Regulation 19 review, as the STA has been undertaken in collaboration with Medway Council and National Highways, and it is expected that it has been subject to suitable technical scrutiny.
- 2.5.2 The major conclusion of the Regulation 19 STA is that even with the inclusion of achievable mode shift targets (Stage 1 and Stage 2 mode shift<sup>4</sup>, analogous to but less ambitious than the Sustainable Transport Strategy being promoted by the Commissioners as a part of the wider Hoo Consortium) through the delivery of BRT and LCWIP infrastructure, that significant highway capacity works will be required to mitigate the growth associated with the Local Plan. The STA recognises that there are existing issues and capacity constraints on the local network, in particular at junctions such as Four Elms Roundabout and M2 Junction 1, and that these will need mitigation in any case. The inherent need for mitigation is therefore not solely due to Local Plan development.
- 2.5.3 The STA presents a series of schemes along the A229/A228 corridor. To the north of the corridor, these are generally limited to minor schemes to improve entry capacity on one or more roundabout entry arms. However

---

<sup>4</sup> Broadly, Stage 1 represents a reduction in car mode share from 72% to 70% for the Peninsula sites, and Stage 2 represents a reduction to 60% with the BRT in place.



to the south at Four Elms Roundabout, Main Road Roundabout and Sans Pareil Roundabout, a series of major schemes have been presented.

- 2.5.4 Notwithstanding the limited optioneering presented in some of the appendices to the STA, the Commissioners would expect that such significant schemes should be subject to an appropriate level of optioneering commensurate with a series of schemes that have been estimated by Medway Council to total in cost to £140 million<sup>5</sup>. It is not clear that this work has been undertaken beyond an initial modelling exercise. Whilst it is accepted that these are only concept designs, and therefore a number of the apparent design issues would likely be addressed as design emerges, the Local Plan is proposing a series of high cost schemes, and which the initial presented evidence indicates may only just achieve their aims in traffic operation terms.
- 2.5.5 In all cases, the presented schemes are not associated with any related work establishing if they are deliverable. All three may require significant levels of third-party land, earthworks and environmental works, and it is not clear this has been costed for, or is deliverable.
- 2.5.6 Given that the burden of funding a substantive proportion of these works is likely to fall to the Commissioners through their potential larger allocations (compared with other sites on the Hoo Peninsula), it is critical that this process has properly explored what is necessary and deliverable, what the options are to achieve the requirements, and whether the proposed level of mitigation is appropriate at all.
- 2.5.7 The modelling/forecast traffic basis for the proposals is based on 'unrestricted demand' after the mode share measures have been applied to trip generation in the strategic highway model. Whilst this is not a pure 'predict-and-provide' approach, it still follows many of these principles and does not consider that it may not be in the policy interest to mitigate the junctions to the level of fully satisfying forecast demand.
- 2.5.8 This is particularly relevant when it is noted that the work undertaken in the STA indicates (for example) that the M2, M2 Junction 1 and the western part of the A289 are still likely to be a constraint on the local network. As it is not currently proposed to mitigate those issues, there is a risk that the junctions in question may be over-mitigated with the proposed schemes, leading to a release of local travel demand by car, undermining the desired shift to active travel and public transport for local journeys.
- 2.5.9 Overall, whilst the Commissioners recognises the need for some level of local highway mitigation, the scale of the schemes proposed may be excessive and a more effective use of funding would be a more focussed targeting of mode shift through public transport and active travel interventions. This is likely to be more cost-effective and also more closely aligned with the Commissioners and Medway's Vision.

## 2.6 Infrastructure Delivery Plan

- 2.6.1 The Commissioners welcomes the commitment to a range of transport (and non-transport) infrastructure elements through the IDP.
- 2.6.2 The Commissioners also welcomes that the main part of the IDP states that funding for highway works is not exclusively expected to be funded through developer contributions (IDP Section 3.2). However the IDP does not appear to identify a credible source for funding for the BRT scheme to connect Strood and the Peninsula in the core document.
- 2.6.3 More generally, Appendix 1 of the IDP, despite noting many of the transport schemes as "critical" does not identify any funding for almost all the schemes required. The Appendix notes "Section 106" as the only potential funding source in almost all cases. Whilst it is accepted that there is work to do with taking schemes forward, costing and apportionment (see also STA Proportionality Assessment below), given the scale of the costs involved, it is exceptionally unlikely that the burden for these could fall solely to developers.

---

<sup>5</sup> Mid-point estimate (IDP Table 14-1)

- 2.6.4 Table 14-1 of the Medway Junction Modelling and Mitigation component of the STA (June 2025 r1.0) summarises the cost of the proposed highways mitigations as replicated at **Table 2.1**:

**Table 2.1: Extract Table 14-1 from STA Modelling and Mitigation Technical Report**

Junction	Low Cost Estimate		High Cost Estimate	
A228 Peninsula Way/Main Road Hoo	£	11,000,000.00	£	18,000,000.00
A228 Peninsula Way/Dux Court Road/Bells Ln	£	1,000,000.00	£	2,000,000.00
A228 Peninsula Way/Roper's Ln/Ratcliff Highway	£	1,000,000.00	£	2,000,000.00
Sans Pareil Roundabout	£	23,000,000.00	£	38,000,000.00
A2 High Street/Station Road and A2 High Street/Canal Road	£	1,000,000.00	£	1,000,000.00
Pier Road/Gillingham Gate/Dynamo Way Gyratory	£	18,000,000.00	£	30,000,000.00
Dock Road/Middle Street/Wood Street	£	1,000,000.00	£	2,000,000.00
Four Elms Roundabout	£	51,000,000.00	£	84,000,000.00

- 2.6.5 Medway Council's estimates provide a total range for these strategic mitigations of between £107m and £177m. Third-party land costs, statutory undertaker/utility work and earthworks may also add significantly to these figures.
- 2.6.6 The Consortium has undertaken its own cost analysis, which indicates that significantly less funding is required to deliver the highway mitigation schemes proposed by Medway Council. If the cost assumptions were adjusted in line with the Consortium's findings, it would reduce the financial burden on the LP's viability and enhance confidence in the deliverability of the schemes.
- 2.6.7 The reduced cost estimates could also enable earlier implementation of the schemes within the Local Plan timeframe, requiring a lower build-out rate to support their delivery.
- 2.6.8 It is also noted that Medway Council has sought forward funding from the government to facilitate early delivery of the schemes, with a potential clawback mechanism through S106 contributions linked to new housing development to retrospectively cover the costs.
- 2.6.9 More generally, the above costs also exclude BRT infrastructure, which is likely to have a substantive cost and much of which is likely to fall to developers, and also excludes any other local junction mitigations as might be required on a site-by-site basis. It is also worth noting that developers will have many other costs including affordable housing provision, education, health etc. and this is likely to weigh significantly against the viability of new developments on the Peninsula.
- 2.6.10 The IDP states at paragraph 2.8.4:
- "Strategic Infrastructure – Infrastructure which will need to be funded by developers on a fair and equal basis which is proportionate to the development in question and **will not be subject to viability review.**"* [emphasis added]
- 2.6.11 Given this position, it is even more important that the scale of highway works is properly identified, justified and costed at this stage. This approach notwithstanding, it is unlikely that developers could (or should) bear the full cost of remediating the issues on the Medway network exclusively, particularly as some of the mitigation is

required to address pre-existing issues. Any central government funding is likely to require more comprehensive justification than that presented in the STA/IDP to date.

- 2.6.12 The STA and IDP do not include for interim schemes at these junctions and given that contributions are expected to be proportionate to vehicle trips it is not clear, for example, what happens if:
- Strategic mitigation is still required but the Commissioners (and others) have achieved significant trip rate reductions such that overall contributions do not adequately cover the proposed schemes.
  - Costs of the strategic mitigations escalate such that they are no longer fully funded, are not deliverable and block further development.
- 2.6.13 Furthermore, given that contributions would come alongside development, and that the need for the costliest mitigation is likely to be earlier in the Local Plan period, it is unclear how the schemes could come forward ahead of significant parts of their funding basis. A mechanism for forward funding of infrastructure needs to be established.
- 2.6.14 The Commissioners is committed to working closely with Medway Council and considers that there is more to do on this matter.

## 2.7 Proportionality Assessment (July 2025; r2)

- 2.7.1 The Commissioners welcomes the open process being presented by Medway as to the methodology for the apportionment of Local Plan costs. It is understood that this remains an item of active work and discussion and looks forward to engaging in more detail with Medway Council in the following months. As such, the following is at a necessarily high level.
- 2.7.2 At this time, the Proportionality Assessment presents a “Method 1” approach to proportionality which is (broadly) based on splitting costs for each junction based on each allocation’s respective contribution to traffic at the junction. This raises a number of issues:
- This method does not account for background growth on the network which is in part responsible for the need to mitigate some junctions.
  - Four Elms Roundabout (the costliest mitigation) requires mitigation to remediate pre-existing issues regardless of Local Plan development coming forward. The potential expectation that developers bear the full cost of the scheme therefore does not meet the Community Infrastructure Levy Regulations 2010 Section 122(2) planning obligation tests.
  - There is no account taken of the viability associated with the significant levels of costs this would impose on the developers.
  - It is not clear how ‘windfall’ sites would contribute against this method.
- 2.7.3 As noted above, the costs for the proposed schemes are significant and even small proportions of these costs may make sites unviable, threatening the deliverability of the Local Plan. The assessment also does not consider the cost of the BRT provision, which should be a primary focus for transport infrastructure funding.
- 2.7.4 The Proportionality Assessments notes that a potential “Method 2” shall be further developed which (among other considerations) will also consider viability. The Commissioners welcomes this commitment and looks forward to working with Medway on this item.

## 2.8 M2 Motorway

- 2.8.1 The STA includes a review of the implications of the Local Plan on the Strategic Road Network (A2/M2) through a number of reports including:
- M2 Junction Analysis Technical Note

➤ M2 and M20 Merge and Diverge Analysis

- 2.8.2 Given that the M2 is the statutory responsibility of National Highways (NH), the Commissioners would welcome confirmation of NH's current position.
- 2.8.3 It appears that further analytical work will be required. Among immediate issues the analysed future layout appears to be based on a design supporting the Uniper/MedwayOne site from some years ago, which we note, is superseded (in part) by the design of the Lower Thames Crossing (LTC) scheme in this area.
- 2.8.4 For example, the merge/diverge analysis indicates that a minor improvement to the lane gain is required heading towards the south on the M2. However, once the LTC scheme is implemented will no longer be present as there will be 4 running lanes through M2 J1. The work will therefore require updating to reflect the, now consented, LTC scheme.
- 2.8.5 As no mitigation is proposed for M2 J1, no costing has been undertaken. Given the above, works may be required and these would have costs associated. This will impact viability for the Local Plan as a whole and remains an item that the Commissioners would like to see explored further. However, it is acknowledged that this is a cross-boundary issue and that funding will be sought from a number of sources which may include central government and / or other developments within the jurisdiction of other neighbouring Local Authorities.
- 2.8.6 We understand Medway Council has commissioned further work on some of these matters and look forward to engaging on these in due course with all appropriate Stakeholders.

## 3 Conclusion

### 3.1 Background

- 3.1.1 Pell Frischmann (PF) has been appointed by the Church Commissioners for England (the Commissioners) to provide transport planning and highways engineering advice, and to produce these Representations summarising the Commissioners' transport position with regard to the emerging Medway Local Plan (LP) which is currently at Regulation 19 consultation stage.
- 3.1.2 The Commissioners is responsible for substantial land holdings across the Hoo Peninsula, Kent. The Hoo Peninsula forms the northern part of the Medway Council (MC) local authority area, for which MC is the Local Planning Authority and Local Highway Authority. The Commissioners has been working in collaboration with Medway Council (MC) for an extended period of time both to deliver development, and to provide sites in support of the Local Plan, assisting Medway in achieving its goals for sustainable growth.
- 3.1.3 Medway Council have developed a new LP to provide the framework to guide the development and use of land in Medway up until 2041 and released the revised evidence base and LP for Regulation 19 consultation in June 2025. This TN summarises the representations of the Commissioners with regard to the transport aspects of the LP.

### 3.2 Summary

- 3.2.1 The Commissioners welcomes the 2041 Vision for Medway and its focus on public transport and active travel as a basis for sustainable growth in the area. The potential BRT scheme to deliver a 'step-change' in bus provision on the Peninsula and for connectivity to Strood will be key to achieving this vision. The Commissioners looks forward to working with Medway to further develop these proposals to ensure they are both deliverable and successful.
- 3.2.2 The Commissioners considers that the new LP presents an opportunity for prioritising sustainably-planned residential-led developments with strong links to new employment centres. The Hoo Peninsula provides a number of such opportunities, such as the proposed site allocations for a potential development at Ropers Lane.

This area is closely located to planned and existing employment centres and development, such as both Hoo St Werburgh and Kingsnorth.

- 3.2.3 The Commissioners' commitment to taking a place-based vision approach to the Peninsula is aligned with Medway's LP approach and the incorporation of the proposed vehicle trip budget approach is welcomed. There is more work to do on this and the Commissioners expects to work with Medway on incorporating this into the Area-Wide Travel Plan and establishing the practical methodology of this going forward.
- 3.2.4 The Strategic Transport Assessment identifies some existing and forecast highway capacity constraints relating to the Peninsula which will need to be addressed, even in light of the vision-led approach. Medway have proposed mitigation schemes, some exceptionally large, but these are not supported by a clear optioneering process commensurate with scale.
- 3.2.5 Additionally, the deliverability of the schemes is unclear (particularly at Four Elms Roundabout) and this is a risk. Costing has been undertaken and has resulted in some very high estimates which are higher than the independent cost analysis undertaken by the Consortium. The LP, Infrastructure Delivery Plan and a Proportionality Assessment imply that there is an expectation that developers could bear the full value of the highway proposals. The Commissioners considers this is not likely to be realistically viable, and also does not account for the other key items which developers must contribute, e.g. to the proposed BRT scheme which must be a priority.
- 3.2.6 An initial methodology for cost apportionment has been proposed by Medway Council but it seems unlikely that this will achieve its aims and enable development, therefore the Commissioners looks forward to further discussion with Medway Council on the determination of a second methodology which accounts for viability.
- 3.2.7 Medway Council has undertaken some highway assessment work of the M2 and in particular M2 Junction 1 as a part of the LP Evidence Base. There remain some outstanding issues and the LP does not propose improvements to M2 J1 or apportion costs to do so. The Commissioner looks forward to further discussion with Medway Council and all relevant Stakeholders on this matter.
- 3.2.8 Overall, the Commissioners considers the emerging Medway Local Plan as an appropriate emerging basis for a cohesive vision for the Hoo Peninsula. The Commissioners welcomes the ambitious policies that clearly target sustainable development on both the Hoo Peninsula and across the wider Medway region, and which are orientated around the key transport objectives of the LP, noting (where relevant) where it is considered that some aspects of the LP can be strengthened.

This report is to be regarded as confidential to our Client and is intended for their use only and may not be assigned except in accordance with the contract. Consequently, and in accordance with current practice, any liability to any third party in respect of the whole or any part of its contents is hereby expressly excluded, except to the extent that the report has been assigned in accordance with the contract. Before the report or any part of it is reproduced or referred to in any document, circular or statement and before its contents or the contents of any part of it are disclosed orally to any third party, our written approval as to the form and context of such a publication or disclosure must be obtained.


<b>Report Ref.</b>		105391-PEF-XX-XX-TN-TR-004007				
<b>File Path</b>		P:\1053--\105391 - Kingsnorth\01 - WIP\Documents\Transport Planning\105391-PEF-XX-XX-TN-TR-004007 - Medway LP CCfE Transport Reps Reg 19.docx				
Rev	Suit	Description	Date	Originator	Checker	Approver
P01	S3	Initial Issue	7-Aug-2025	CJO	DW	PDS
P02	S3	Issue following comments	11-Aug-2025	CJO	DW	PDS
P03	S3	Final Issue	11-Aug-2025	CJO	DW	PDS
Ref. reference. Rev revision. Suit suitability.						







## Model Representation Form for Local Plans

	<b>Local Plan</b> Publication Stage Representation Form	<b>Ref:</b>  <b>(For official use only)</b>
---	---	---

**Name of the Local Plan to which this representation relates:**

**Medway Local Plan**

**Please return to Medway Council Planning Service by 11<sup>th</sup> August 2025**

Email: [planning.policy@medway.gov.uk](mailto: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	<input type="text"/>	<input type="text" value="Ms"/>
First Name	<input type="text"/>	<input type="text" value="Laura"/>
Last Name	<input type="text"/>	<input type="text" value="Eacott"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Senior Planner"/>
Organisation (where relevant)	<input type="text" value="The Church Commissioners for England"/>	<input type="text" value="Savills"/>
Address Line 1	<input type="text" value="Church House"/>	<input type="text" value="74 High Street"/>
Line 2	<input type="text" value="Great Smith Street"/>	<input type="text" value="Sevenoaks"/>
Line 3	<input type="text" value="London"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="SW1P 3AZ"/>	<input type="text" value="TN13 1JR"/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address	<input type="text"/>	<input type="text" value=""/>

(where relevant)

---

---

## Part B – Please use a separate sheet for each representation

---

---

Name or Organisation: The Church Commissioners for England

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

Please see attached representations for full details.

(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.

Please see attached representations for full details.

(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:

The Church Commissioners for England would like to participate in the hearing sessions to support the proposed allocation of their land. A number of modifications have been proposed in the attached representations and the Commissioners wish to ensure that these modifications are incorporated in the Local Plan.

**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>



11 August 2025  
L250811 ZAL - SAV Reg 19 Consultation Reps



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

Matthew Sobic

Belvedere, 12 Booth Street,  
Manchester, M2 4AW

Savills.com

**SUBMITTED VIA EMAIL:** [futuremedway@medway.gov.uk](mailto:futuremedway@medway.gov.uk)

Dear Sir or Madam

**MEDWAY LOCAL PLAN 2041: PROPOSED SUBMISSION DRAFT, REGULATION 19 – JUNE 2025  
REPRESENTATIONS SUBMITTED ON BEHALF OF ZURICH ASSURANCE LIMITED**

**Introduction**

We write on behalf of our client, Zurich Assurance Limited, to submit formal representations to the Medway Local Plan 2041: Regulation 19 – June 2025 (the '**Reg 19 Consultation**').

Zurich Assurance Limited is the owner of large areas of the land as part of the areas known as Gillingham Business and Retail Park.

This correspondence therefore provides Zurich Assurance Limited's representations to the current Reg 19 Consultation in order to assist with the production of the new Local Plan. Our client wishes to work proactively and positively with the Council and would welcome the opportunity to meet with Officers in order to discuss the enclosed comments in more detail, should that be of assistance.

Whilst our client generally supports the overall aims of the emerging Local Plan, there are a number of comments and objections to specific parts of individual policies, which are set out in this letter below. These objections can be easily remedied by amendments as detailed in this letter.

**Representations**

These representations continue support for the overall approach of the emerging Local Plan however additional responses and comments have been provided in response to the proposed site allocation and specific policies. These comments have been prepared to assist the LPA's preparation of its emerging Local Plan to ensure that it can ultimately be found 'sound'.



## Development Management Policies

### **Policy S11: Existing Employment Provision**

The Business Park element of Gillingham Business Park is designated as an Existing Employment Area in the emerging Local Plan and Policy S11 sets a series of tests where a proposal is not for uses within Class Eg, B2 and B8.

We acknowledge the initial objectives of the policy are broadly consistent with the NPPF that seeks to enhance economic growth and productivity (Paragraph 85), but consider the policy is too rigid in terms of not permitting alternative uses that may support the sustainability of a wider employment area including ancillary facilities for employees of the employment area – e.g. provision for ancillary commercial uses such as coffee shops / restaurants and health and fitness facilities that are common-place on high quality employment areas in terms of attracting occupiers and employees.

Further, the policy does not reflect the new requirements of the National Planning Policy Framework (the 'NPPF') at Paragraph 125 (c) that not only identifies the substantial value that should be attached to the re-use of brownfield land, but now confirms that where a proposal meets an identified need, it should be approved unless there is 'substantial harm' that arises from the proposal.

We therefore consider that the first part of the policy should be updated as follows (update in red):

Where planning permission is required, proposals for employment uses (Classes Eg, B2 and B8) will be supported at Existing Employment Areas identified on the Policies Map.

*Where planning permission is required, proposals for the redevelopment or change of use of employment land and buildings to non-employment uses will be supported where:*

- *The existing use is proven to be no longer appropriate or viable.*
- *There is no market interest in the site, and it has been marketed for a reasonable period (of 12 months).*
- *The proposal would provide an ancillary of complementary facility that supports the wider operation of the employment area.*
- *The proposal is on brownfield land and would meet an identified need, where the approval would not result in a substantial harm.*

The above would ensure that this aspect of the emerging Policy would be sound as it would accord with the terms of national policy. The ancillary development aspect of the Policy that we propose would also be consistent with Policy T16.

### **Policy T15: Sequential Assessment**

Our client has no concerns with the inclusion of a sequential test policy as is consistent with the NPPF, but we recommend that the Policy is reworded to simply require a sequential assessment to be undertaken in accordance with national policy and guidance, removing those elements that are duplicated in order to comply with NPPF Paragraph 16(f).

We also object to the introduction of a requirement to demonstrate trade draw of a proposal, in order to inform the sequential test. Trade draw forms part of a quantitative retail impact assessment, but the policy effectively seeks to introduce this requirement into the sequential test. Whilst larger scale proposals will be required to do so because they exceed the impact assessment thresholds, for those smaller schemes which do not require quantitative impact assessment, or for leisure uses, this is not proportionate or required by national policy. Therefore we consider that the policy should be reworded, to only refer to trade draw where a quantitative retail impact assessment is required under Policy T17.

Finally, the final paragraph refers to demonstrating sustainable travel choices under Policies DM18 and DM19. This is not relevant to a sequential assessment policy and does not appear under the requirements of the NPPF insofar as the sequential test is concerned. We therefore object as the Policy provides duplication and therefore does not accord with Paragraph 16(f) of the NPPF.

### ***Policy T17: Impact Assessment***

#### ***a) Thresholds***

We have reviewed the methodology undertaken at Paragraph 5.58 – 5.82 of the Medway Retail and Town Centres Study 2025 that sets out a suggested justification for impact thresholds.

The rationale for the approach reached in terms of the impact thresholds is not clear. It is not clear for example whether a convenience goods store of 280 sq. m or above may be one that could have an adverse impact on a town centre location that needs testing as to whether that impact is significant. The same comment also applies to comparison goods and leisure impact thresholds. The thresholds appear to be based on a profile of the average size of units within centres. However, this does not reflect whether a proposal may have an adverse impact on an existing centre that needs testing to understand whether that impact assessment could be significant. For example, we can't see the evidence where a foodstore proposal that exceeds 2,000 sq. m, is one of a level that could be giving rise to impacts of significance on existing centres. We therefore consider that a review of the evidence is required, as otherwise we consider that there is no reasoned justification to depart from the national thresholds. Simply stating that the thresholds are based on average unit sizes does not give sufficient justification for example as to why a proposal that may not be within range of the threshold is of a level that could have a significant adverse impact. For example a much larger proposal than the threshold may therefore not fulfil a commensurate role to the facilities within the centres and therefore may not provide a level of competition to those centres that needs testing. The effect of the current policy threshold is that it is not prepared positively and based on a restrictive approach that is not supported by the evidence provided in conflict with Paragraph 16(b) of the NPPF and it provides an onerous burden on applicants requiring unnecessary information. We reserve the right to provide evidence in support of alternative thresholds if an appropriate review of impact thresholds is not undertaken.

Further, it isn't clear whether for retail use, these figures are GIA, GEA or net sales area. Given the approach to adopting different thresholds for convenience and comparison goods, in our view this should relate to their net sales area. Adopting a GEA or GIA figure is rarely helpful and is not relevant to the consideration of impact as it does not reflect the area where retail goods are sold from.

#### ***b) Impact assessment criteria***

Criteria b) sets out the matters that are required to be considered under the impact assessment. Whilst the 2<sup>nd</sup> and 3<sup>rd</sup> bullet points effectively reiterate the NPPF paragraph. As such, additional requirements go beyond the NPPF and are therefore not consistent with it.

Notwithstanding this, it is unclear what is meant by the 1<sup>st</sup> bullet point in relation to impact on 'the strategy'. If this means the impact on the defined centres which are set out in Policy S16, then this is captured by the assessment under the 2<sup>nd</sup> and 3<sup>rd</sup> bullet points. Similarly, such an assessment will capture the impact on the health of centres, and their vulnerability, under the 4<sup>th</sup> and 5<sup>th</sup> bullet points and it is unclear what else these requirements are intended to capture. Finally we note that the 3<sup>rd</sup> bullet includes reference to 'investment supporting town centres'. It is unclear what is meant by this, as if investment is within a centre, then it is assessed under the existing, planned or committed criteria of this part of the policy. It is therefore ambiguous but also unnecessary.

Therefore we object to the Policy as it contains unnecessary duplication, but also ambiguity, and is therefore not consistent with NPPF paragraphs 16(d), 16(f) and 35(d).

#### ***Other Matters***

Finally, the final paragraph refers to demonstrating sustainable travel choices under Policies DM18 and DM19. This is not relevant to an impact assessment policy, avoids unnecessary duplication, and those policies will need to be complied with where relevant. Therefore, we object to the wording of the Policy on this basis.

### **Summary and Conclusion**

We trust that this correspondence will be fully considered by the Council as part the preparation of the emerging Local Plan.

As set out above, Zurich Assurance Limited wishes work positively and proactively with the LPA. We are happy to arrange a meeting to discuss the representation and evidence to best inform the Local Plan process.

We would be grateful if you can keep us updated on progress of the Local Plan review and any future stages of consultation.

In the meantime, if you have any questions please contact Matthew Sobic at these offices.

Yours faithfully



**Savills (UK) Ltd**  
Planning



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

Taylor Wimpey West London  
Strategic Land  
Form 1  
17 Bartley Wood Business Park  
Bartley Way  
Hook, Hampshire  
RG27 9XA

[www.taylorwimpey.co.uk](http://www.taylorwimpey.co.uk)

Via Email to [planning.policy@medway.gov.uk](mailto:planning.policy@medway.gov.uk)

11<sup>th</sup> August 2025

Dear Sirs,

**Medway Local Plan 2041 – Proposed Submission Draft, Regulation 19  
Representations on behalf of Taylor Wimpey**

We are writing in response to Medway Council's Regulation 19 Local Plan consultation.

Taylor Wimpey (TW) is one the UK's largest housebuilders with a clear strategy to deliver new homes and thriving communities with a focus on sustainability. TW is active across Kent and the wider South East, delivering a significant number of new homes annually across the region.

TW owns land within the District – specifically at Land West of Hoo St Werburgh, north of Main Road and south of A228 Peninsula Way. TW is also part of the wider Hoo Consortium, which has submitted joint representations in response to the current consultation.

These representations should be read alongside the Consortium representations. These specific representations do not seek to repeat what is said in the Consortium representations- they identify specific concerns that we would wish to see addressed in the next draft of the Local Plan.

**Land West of Hoo**

TW's interest in Land West of Hoo (the Site) extends from the existing western urban edge of Hoo St Werburgh, the residential properties on Aveling Close and the A228 dual carriageway (Peninsula Way) to the north-west.

The Site is 31.12ha in total and primarily greenfield, currently in agricultural use, and is divided into two main parcels of land, either side of the Ratcliffe Highway (in which TW owns the freehold of the Site)<sup>1</sup>.

Taylor Wimpey UK Limited  
Registered Number:  
1392762 England and Wales  
Registered Office:  
Gate House, Turnpike Road  
High Wycombe, Buckinghamshire  
HP12 3NR

Taylor Wimpey West London is a  
division of Taylor Wimpey UK Ltd

---

<sup>1</sup> Site Plan (redline)



The Site can be brought forward for development comprising the following<sup>2</sup>:

- 450 dwellings,
- Commercial floorspace (up to 500sqm),
- Community use building (up to 500sqm),
- Associated public open space, landscaping & outdoor sports facilities.

The Site is not subject to any restrictive covenants or other constraints which would potentially impact the deliverability of the proposed development. The Site is “suitable”, “available”, and “achievable”, and housing can be delivered on it within the next 5-years.

TW submitted an outline application to the Council in September 2024, the determination of which is on-going. The application was supported by a comprehensive Environmental Statement informed by pre-application scoping.

### **Medway Local Plan 2041 – Regulation 19 Consultation (August 25)**

Firstly, we would like to congratulate the Council for reaching this stage in its Plan-making – we support its continued efforts to adopt a new Local Plan.

We note that the Council is seeking to meet its housing requirement as per the new standard method of 1636 new homes per annum, which is also supported.

### **Vision for Medway in 2041**

We support the Vision for 2041 in which: “Housing and economic development needs have been met in full, supported by appropriately phased infrastructure.”

It is clear that the Local Plan is ‘Infrastructure-Led’ and we urge the Council to continue to develop and refine its evidence base in relation to:

1. The infrastructure required to support growth- not just for housing but employment space, retail etc.
2. The critical timing and phasing of this infrastructure.
3. The cost of the infrastructure.
4. The delivery of the infrastructure – delivery agent, land control, funding; and
5. In relation to the funding of the infrastructure, and where costs are to be met by development, the viability of the proposed costs.

The IDP, whilst accepting its “work in progress” status, requires significant development in terms of:

1. Items that are not costed.
2. Unidentified Delivery bodies.
3. Unidentified Funding sources.

This includes the “Extended bus services to Hoo Peninsula & strategic growth areas” item as well as:

1. New Hoo St Werburgh Sports Centre development.
2. Integrated Community Hub for Hoo St Werburgh.
3. Sports provision for Hoo St Werburgh.

---

<sup>2</sup> See Illustrative Layout

Where costs are provided, we would ask that these are explained and substantiated. We would recommend that costs – particularly those proposed to be attributed to S106 funding streams - are clearly justified and proportionate.

The Vision sets out a vision in which: “Improved travel choices and infrastructure have reduced the use of the car across Medway with people benefitting from better provision for pedestrians and cyclists, and a great public transport offer.”

We support this Vision and recommend that an ambitious strategy for public transport – which builds on the Mode Share Strategy - is developed with stakeholders such as the bus companies and developers, setting out clear, costed interventions for infrastructure and service delivery.

We recommend that the Local Plan is supported by a clear Sports Provision Strategy to include sports pitches, setting out what is required to support growth with clarity on when it is to be delivered, how and by whom.

We also look forward to publication of the Local Nature Recovery Strategy and its coverage in the next draft of the Local Plan.

#### Spatial Development Strategy

We support the Council’s “implementation of a spatial strategy to deliver sustainable development in Medway up to 2041 that meets full provision for Medway’s development needs.”

We support the ambition of “reducing reliance on cars” (as stated above) and the protection of sites of national and international importance for wildlife and landscape.

It is noted that the draft Habitat Regulations Assessment is in an interim form at present and we would support the Council’s completion of this crucial work prior to Plan submission in consultation with stakeholders - the statutory agencies, wildlife groups and bodies, local communities and developers.

We support strategic, sustainable development at Hoo St Werburgh.

#### Housing Delivery

Taylor Wimpey supports the aspiration for residential development on the Hoo Peninsula of at least the scale/ quantum within the emerging Local Plan. The HBF comments in respect of the Plan period, housing requirement and housing land supply are noted.

Taylor Wimpey has an extant application with Medway for 450 homes on its Land West of Hoo (LPA reference MC/24/2022). The Site-Specific Annual Housing Trajectory at Appendix G of the Land Availability Assessment (June 2025) provides for 280 homes on this site in the first five years of the Local Plan with the remaining 170 homes in Years 6-10. To ensure this site contributes to housing land supply as envisaged, Taylor Wimpey will continue to work with the Council on approval of the extant application. The earlier the approval, the more homes Taylor Wimpey will be able to deliver in the early part of the Plan period thus assisting in positively responding to the HBF comments and providing for a more robust five-year housing land supply position.

#### Infrastructure & Viability

It is essential that:

1. The evidence base is comprehensive and robust.
2. The Infrastructure and S106 (including affordable housing) requirements to be assigned to new development are relevant, proportionate, and crucially, viable.

To this end, Taylor Wimpey looks forward to working with the Council in the coming months to complete the evidence base, the IDP and the Viability Assessment.

**We wish to reserve our position with respect to the IDP and the Viability Assessment until we have sight of the updated versions.**

#### Policy S22 – Hoo Peninsula

It is noted that two new neighbourhood centres are proposed for Hoo St Werburgh. One to be located along Chattenden Lane and one to be centrally located potentially with colocation with Hoo Sports Centre.

Whilst we do not object to this broad policy, we would point out that the phasing of new neighbourhood centres is a crucial point for sustainable development, which is not considered within Policy S22. That said, supporting paragraph 8.12.4 highlights the recommendation within the Retail and Town Centre Study (2025) for the new retail centres alongside '*new convenience retail to support sustainable habits*'. This would support small-scale/ individual shops coming forward as proposed through the extant planning application for our site which is welcomed.

**We would wish to reserve our position on Policy S22 and look forward to discussing with the Council how the phasing of new neighbourhood centres can provide for sustainable development.**

#### Policy SA8 & Site HHH8

With respect to Site HHH8, whilst we support its allocation for development, **we would wish to object to Figure 14 – Hoo St Werburgh and Chattenden Concept Plan.**

Figure 14 proposes a Strategic Green Corridor through Site HHH8 which we do not consider to be properly evidenced and justified. Draft Policy SA8 and the Concept Masterplan pre-determine that this is the only/ best means of maintaining separation. This is overly prescriptive for a site allocation policy. Moreover, a Strategic Green Corridor as shown on Figure 14 is not deliverable. The A228 is an existing four-lane dual carriage way providing a strong physical barrier between Hoo St Werburgh and Chattenden that would prevent delivery of a Strategic Green Corridor in this location.

The live application for Site HHH8 demonstrates how the separation of Hoo St Werburgh and Chattenden can be achieved through deliverable means underpinned by robust technical assessment which include appropriately located green spaces/ facilities and strengthening of landscaping adjacent to the A228.

We look forward to working with the Council to refine Figure 14 prior to submission of the Local Plan.

#### Summary

In summary, Taylor Wimpey supports the Council's progress towards adoption of a Local Plan.

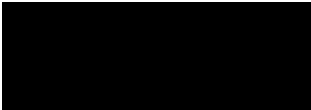
We support the Vision and Spatial Development Strategy.

We note that the evidence base, IDP and Viability Assessment are in development and we look forward to working with the Council to ensure that the foundations of the Local Plan are comprehensive, robust and sound.

We wish to object to Figure 14 – Hoo St Werburgh and Chattenden Concept Plan and refer to the Council to the submitted, live application for Site HHH8.

Should you have any questions or comments, please do not hesitate to contact me as per the details below.

Yours faithfully,



**John Kelly MRICS**  
**Strategic Project Director**  
**Taylor Wimpey UK Limited**



## Annex 1 – Site Plan





## Annex 2 – Illustrative Layout



## 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 11<sup>th</sup> August 2025

Email: [planning.policy@medway.gov.uk](mailto: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	John	
Last Name	Kelly	
Job Title (where relevant)	Strategic Project Director	
Organisation (where relevant)	Taylor Wimpey	
Address Line 1	Form 1	
Line 2	Bartley Way	
Line 3	Hook	
Line 4		
Post Code	RG27 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  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
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.

Please see attached representation letter.

(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.

Please see attached representation letter.

(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:

To explain the representations and seek the necessary modifications to the Plan.

**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>